

Performance Review Board

Monitoring Report

Portugal - 2025



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1 OVERVIEW

1.1 Contextual information

This document is based on the version of the Annual Monitoring Report file submitted by the state on 2026-07-06 (PT12481_PT12261_PT12077_Portugal_ AMR 2025_V29_06.xlsx) and the accompanying submission of en route and terminal (if applicable) reporting tables.

National performance plan adopted following Commission Decision (EU) 2025/1059 of 19 May 2025

List of ACCs 1
Lisbon ACC

Exchange rate (1 EUR=)
2022: 1 EUR
2025: 1 EUR

Main ANSP

- NAV Portugal (Continental)

No of airports in the scope of the performance plan:

- $\geq 80^{\circ}\text{K}$ 2
- $< 80^{\circ}\text{K}$ 8

Share of Union-wide:

- **traffic (TSUs) 2025** 3.5%
- **en route costs 2025** 2.2%

Other ANSPs

- Estado Maior da Força Aérea
- Estado Maior da Armada

Share en route / terminal costs 2025 78% / 22%

MET Providers

- IPMA

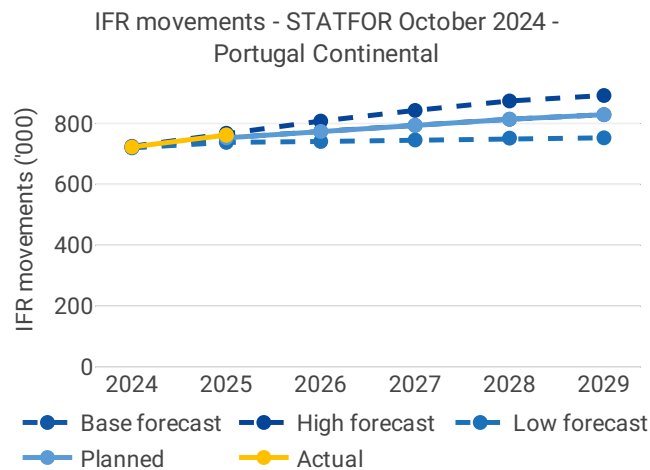
En route charging zone(s)

Portugal Continental

Terminal charging zone(s)

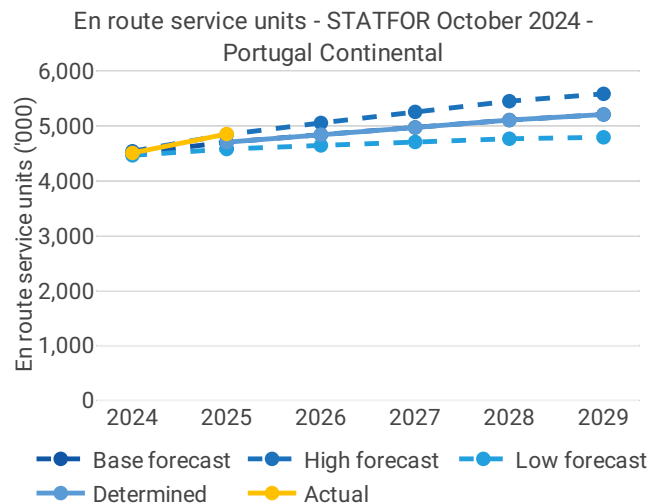
Portugal

1.2 Traffic (En route traffic zone)



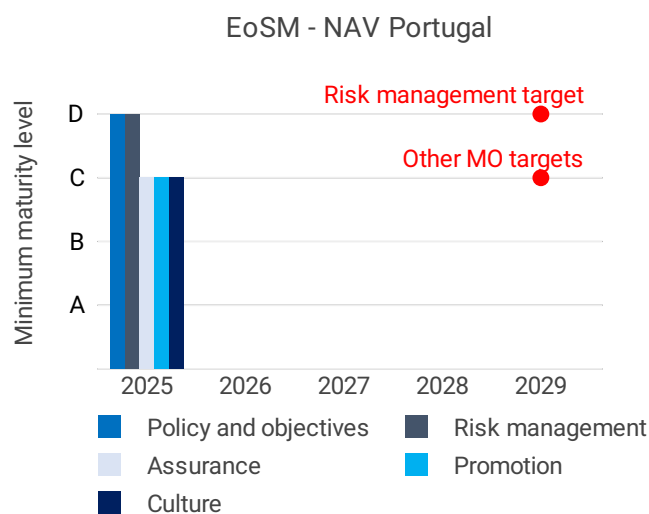
- Portugal recorded 762K actual IFR movements in 2025, +5.4% compared to 2024 (723K).
- Actual 2025 IFR movements were +1.2% above the plan (753K).
- Actual 2025 IFR movements were +17.0% above the actual 2019 level (651K).





- Portugal recorded 4,855K actual service units in 2025, +7.6% compared to 2024 (4,510K).
- Actual 2025 service units were +3.2% above the plan (4,706K).
- Actual 2025 service units are +19.6% above the actual 2019 level (4,060K).

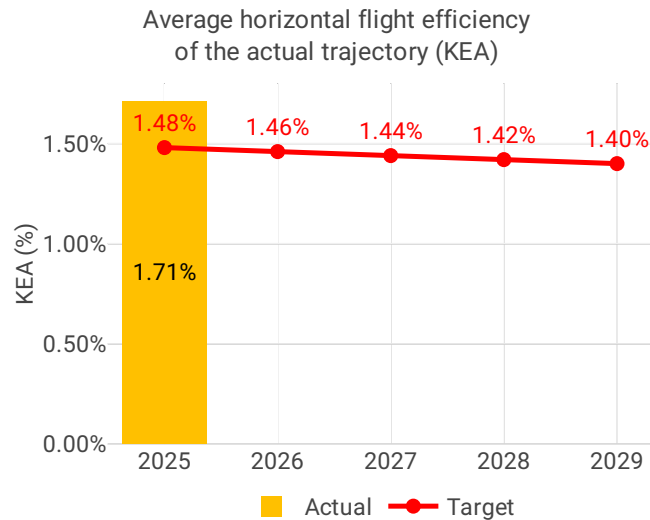
1.3 Safety (Main ANSP)



- In 2025 NAV Portugal achieved the planned maturity levels set out in its performance plan for all five components of the EoSM. In more detail, NAV Portugal exceeded the planned level in the areas of Safety Policy and Objectives and Safety Risk Management.
- The rate of runway incursions (RI) was 3.31 at airport level, higher than the Union-wide average, and higher than the rate of RIs in 2024.
- The rate of RIs with ANS contribution was 1.10, higher than the Union-wide average, and higher than the rate of RIs with ANS contribution in 2024.
- The rate of separation minima infringements (SMIs) at State level was 1.24, and at ANSP level 1.65. Both indicators were below the Union-wide average. When comparing to 2024, rate of SMIs has decreased slightly at State level and increased slightly at ANSP level.



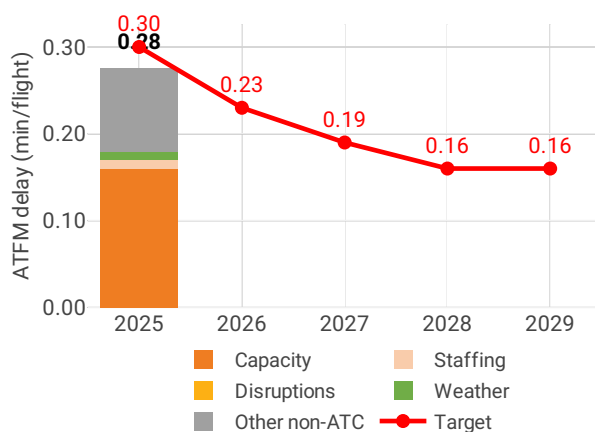
1.4 Environment (Member State)



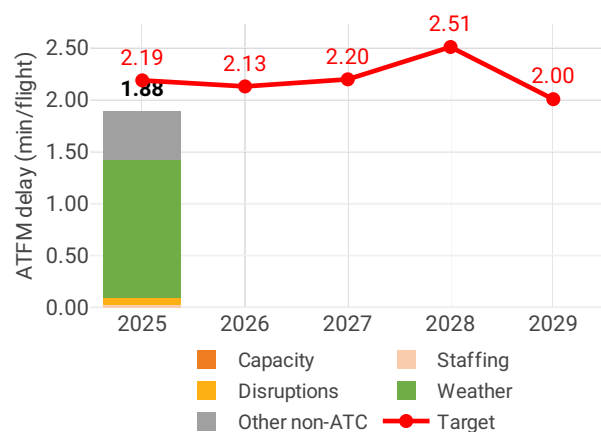
- Portugal registered a KEA performance of 1.71%. Their target of 1.48% was not achieved and Portugal did not contribute positively to Union-wide performance. The NSA states that the deviation from the target may be linked to the new Point Merge system, whose impact was not fully anticipated at the time the performance plan was established.
- Both KEP and KES deteriorated in comparison with 2024.
- VFE of the actual en route trajectory was at 76.08%, which was similar to the average Union-wide performance.
- The average time in level flight during descent deteriorated and during climb remained stable with minor deterioration compared to 2024.
- Additional taxi-out time was 4.19 min/flight which deteriorated marginally from 4.00 min/flight in 2024, and additional taxi-in time was 1.76 min/flight which deteriorated from 1.62 min/flight in 2024.
- Additional time in the arrival sequencing and metering area deteriorated to 4.70 min/flight from 4.27min/flight in 2024.

1.5 Capacity (Member State)

Average en route ATFM delay per flight by delay groups

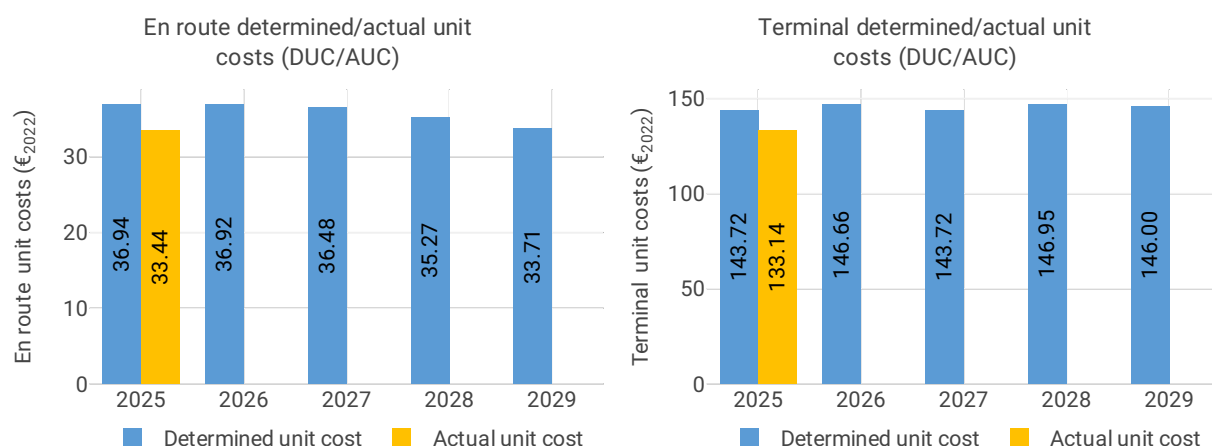


Average arrival ATFM delay per flight by delay groups



- Portugal registered 0.28 minutes of average en route ATFM delay per flight during 2025, which remained 0.28 after the post-ops adjustment process, thus achieving the local target value of 0.30. Delays in Portugal decreased by -0.11 minutes per flight year-on-year.
- Delays were highest in January to April, mostly driven by ATC capacity, and in November and December due to non-ATC causes.
- The share of delayed flights with delays longer than 15 minutes in Portugal decreased by -5 percentage points compared to 2024.
- The number of ATCOs in OPS was 174 being below the 2025 plan in Lisbon ACC by -6 FTE.
- The yearly total of sector opening hours in Lisbon ACC was 70,152, showing a 2% increase compared to 2024.
- Lisbon ACC registered 10.06 IFR movements per sector opening hour in 2025 4% above the 2024 level.
- Portugal registered an average airport arrival ATFM delay of 1.88 minutes per flight in 2025, thus achieving the local target of 2.19 minutes. Compared to 2024, average arrival ATFM delays in Portugal were -0.82 minutes per flight lower higher in 2025.
- The main drivers of delays were weather, accounting for 1.33 of the total delays, and other non-ATC causes, responsible for 0.47.

1.6 Cost-efficiency (En route/Terminal charging zone(s))



- The en route 2025 actual unit cost of Portugal was 33.44€2022, -9.5% lower than the determined unit cost (36.94€2022). The terminal 2025 actual unit cost was 133.14€2022, -7.4% lower than the determined unit cost (143.72€2022).
- The en route 2025 actual service units (4.9M) were +3.2% higher than the determined service units (4.7M).
- The en route 2025 actual total costs were -11.5M€2022 (-6.6%) lower than determined with all cost categories registering lower-than-planned costs, except depreciation. This is mainly due to lower staff costs for NAV Portugal (-10.0M€2022, or -8.9%). The NSA explained that this decrease is partly driven by favourable financial market conditions, which had a positive impact on the defined benefit pension fund.



- NAV Portugal spent 25.3M€2022 in 2025 related to costs of investments for both en route and terminal charging zones, -3.9% less than determined (26.3M€2022). According to the NSA, this reduction is due to a smaller asset base.
- The en route actual unit cost incurred by users in 2025 was 37.68€ (-5.5% below the 2025 DUC), while the terminal actual unit cost incurred by users was 151.68€ (-3.0% below the 2025 DUC). The difference between the AUCU and the DUC for the en route and terminal charging zones is mainly driven by pension costs in cost exempt from cost sharing.

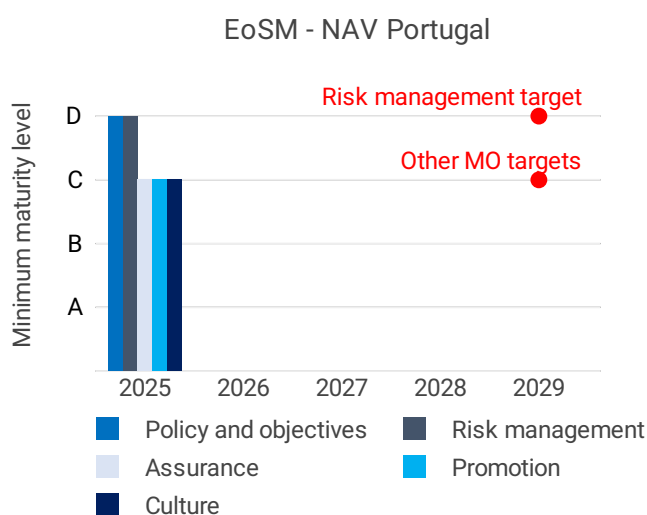


2 SAFETY - PORTUGAL

2.1 PRB monitoring

- In 2025 NAV Portugal achieved the planned maturity levels set out in its performance plan for all five components of the EoSM. In more detail, NAV Portugal exceeded the planned level in the areas of Safety Policy and Objectives and Safety Risk Management.
- The rate of runway incursions (RI) was 3.31 at airport level, higher than the Union-wide average, and higher than the rate of RIs in 2024.
- The rate of RIs with ANS contribution was 1.10, higher than the Union-wide average, and higher than the rate of RIs with ANS contribution in 2024.
- The rate of separation minima infringements (SMIs) at State level was 1.24, and at ANSP level 1.65. Both indicators were below the Union-wide average. When comparing to 2024, rate of SMIs has decreased slightly at State level and increased slightly at ANSP level.

2.2 Effectiveness of Safety Management (EoSM) (KPI#1)



Focus on EoSM

In 2025 NAV Portugal achieved the planned maturity levels set out in its performance plan for all five components of the EoSM. In more detail, NAV Portugal exceeded the planned level in the areas of Safety Policy and Objectives and Safety Risk Management.

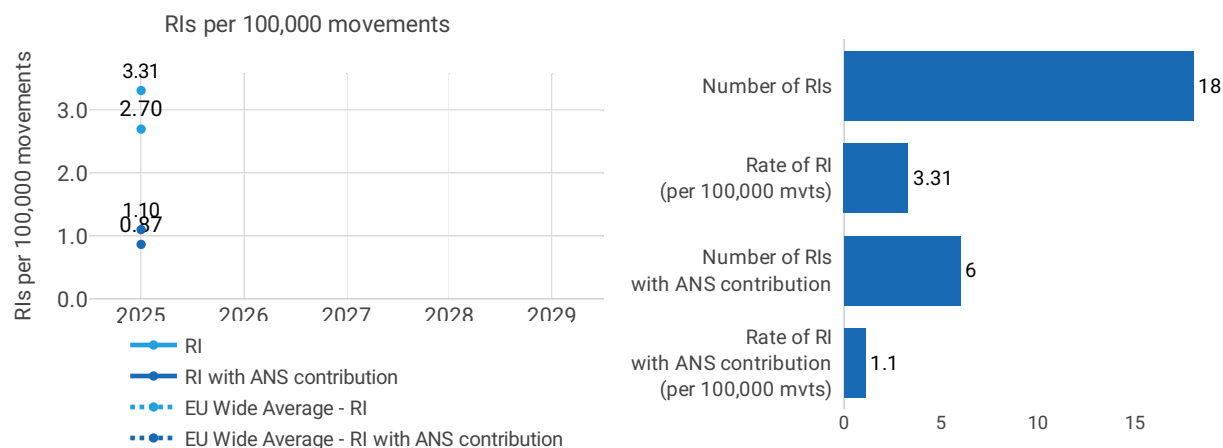
According to the monitoring report, NAV Portugal Is committed to ensure continuous improvement of its SMS. There are still areas for improvement which will require additional effort to achieve higher maturity levels, and it is NAV Portugal's compromise to continue improving in that direction.

To achieve the safety targets, main measures put in place according to the report include improving the processes of safety performance monitoring and change management and risk assessment, raising awareness of human performance principles and reinforcing the concept of safety as an integral value within the organisation safety culture.



2.3 Safety occurrences

2.3.1 Rate of runway incursions (RIs) (PI#1) and Rate of runway incursion with ANS contribution (PI#3)



Rate of RIs per 100,000 airport movements - Portugal						
#	Airport name	APT movements	Number of RI	Rate RI per 100,000	Number of RI with ANS contribution	Rate RI per 100,000 with ANS contribution
1	Lisbon	231,732	13	5.61	4	1.73
2	Porto	112,553	2	1.78	1	0.89
3	Faro	71,132	2	2.81	1	1.41
4	Cascais	47,098	0	0.00	0	0.00
5	Madeira	37,393	0	0.00	0	0.00
6	Ponta Delgada	28,092	1	3.56	0	0.00
7	Horta	5,863	0	0.00	0	0.00
8	Porto Santo	3,877	0	0.00	0	0.00
9	Santa Maria	2,997	0	0.00	0	0.00
10	Flores	2,300	0	0.00	0	0.00

Focus on runway incursions

Portugal has reported 18 runway incursions (RI) during 2025 for all airports listed in the performance plans (10). In terms of ANS contribution, Portugal reported 6 runway incursions.

When comparing the rate of RIs at airport level to Union-wide level, Portugal was higher than Union-wide average (3.31 vs 2.70). The rate has increased compared to 2024 (3.31 vs 0.38).

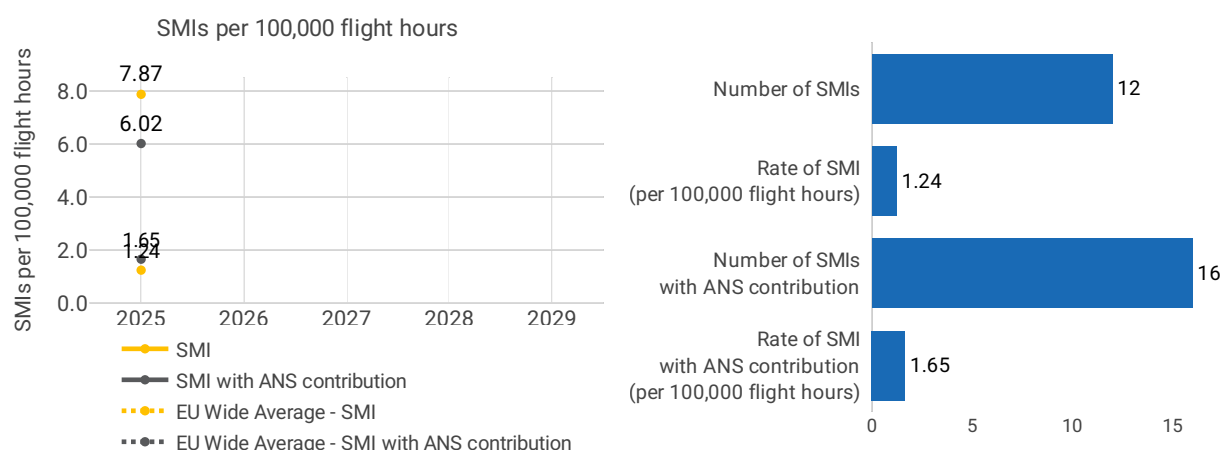
When comparing the rate of RIs at airport level with ANS contribution, Portugal was higher than Union-wide average (1.10 vs 0.87). The rate has increased compared to 2024 (1.10 vs 0.38).

In terms of the initiatives implemented or planned to improve this performance indicator, the report defines the following elements: Increased number of Observational Safety Surveys directed to the application of runway incursion preventive measures, namely the adherence to GAPPRI recommendations. Implementation of RWY Occupancy warning in the



VAISALA system. Tighter coordination with aerodrome stakeholders through Local Runway Safety Team. Improvements in ground surveillance in LPPT, LPPR and LPFR (on-going developments). RI automatic warnings in Azores aerodromes (LPPD, LPHR, LPFL, LPAZ) through SATL-TWR system (on-going developments).

2.3.2 Rate of separation minima infringements (SMIs) (PI#2) and Rate of separation minima infringements with ANS contribution (PI#4)



Rate of SMI with ANS contribution per 100,000 flight hours

#	ANSP	Flight hours					Number of SMIs with ANS contribution				
		2025	2026	2027	2028	2029	2025	2026	2027	2028	2029
1	NAV Portugal	969,074	NA	NA	NA	NA	16	NA	NA	NA	NA

#	ANSP	Rate of SMI with ANS contribution per 100,000 flight hours					% variation in rate of SMIs				
		2025	2026	2027	2028	2029	2025	2026	2027	2028	2029
1	NAV Portugal	2	NA	NA	NA	NA					

Focus on separation minima

At State level, Portugal reported 12 separation minima infringements (SMI) in their airspace during 2025. The rate of separation minima infringements was lower than the Union-wide average (1.24 vs 7.87). At ANSP level, Portugal reported 16 SMIs with ANS contribution. The rate of separation minima infringements at ANSP level was lower than the Union-wide average (1.65 vs 6.02).

When comparing to 2024, the rate of separation minima infringements has decreased at State level (1.24 vs 1.51) and increased slightly at ANSP level (1.65 vs 1.51).

In terms of improving this performance indicator, the monitoring report lists the following initiatives implemented or planned: Implementation of new features in the new Air Traffic Management System (TOPSKY) which are intended to improve safety. Continuous refreshment training (annual refreshment courses) delivered to all ATCOs. Increase of the Normal Operations Monitoring activities targeting En-route and Approach environments.



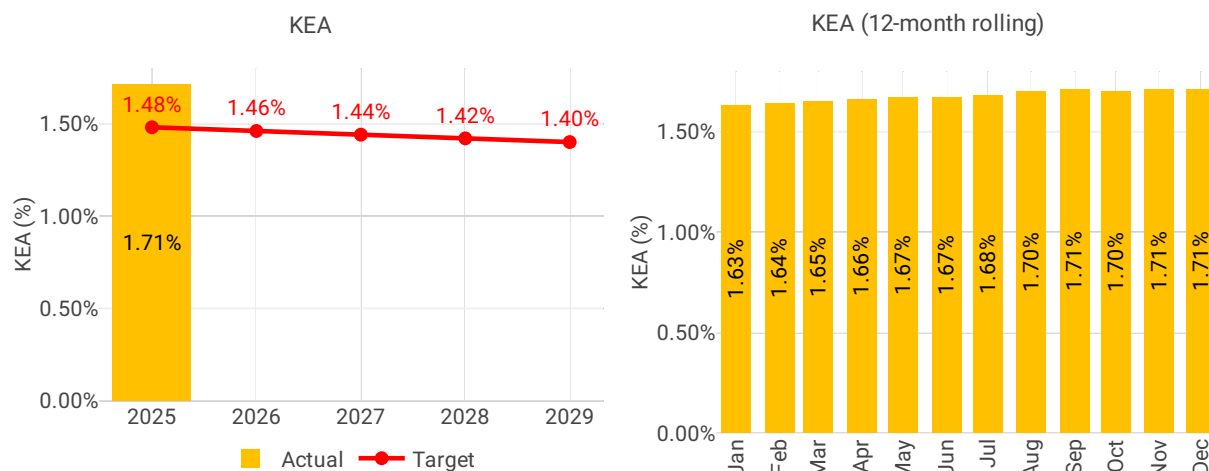
3 ENVIRONMENT - PORTUGAL

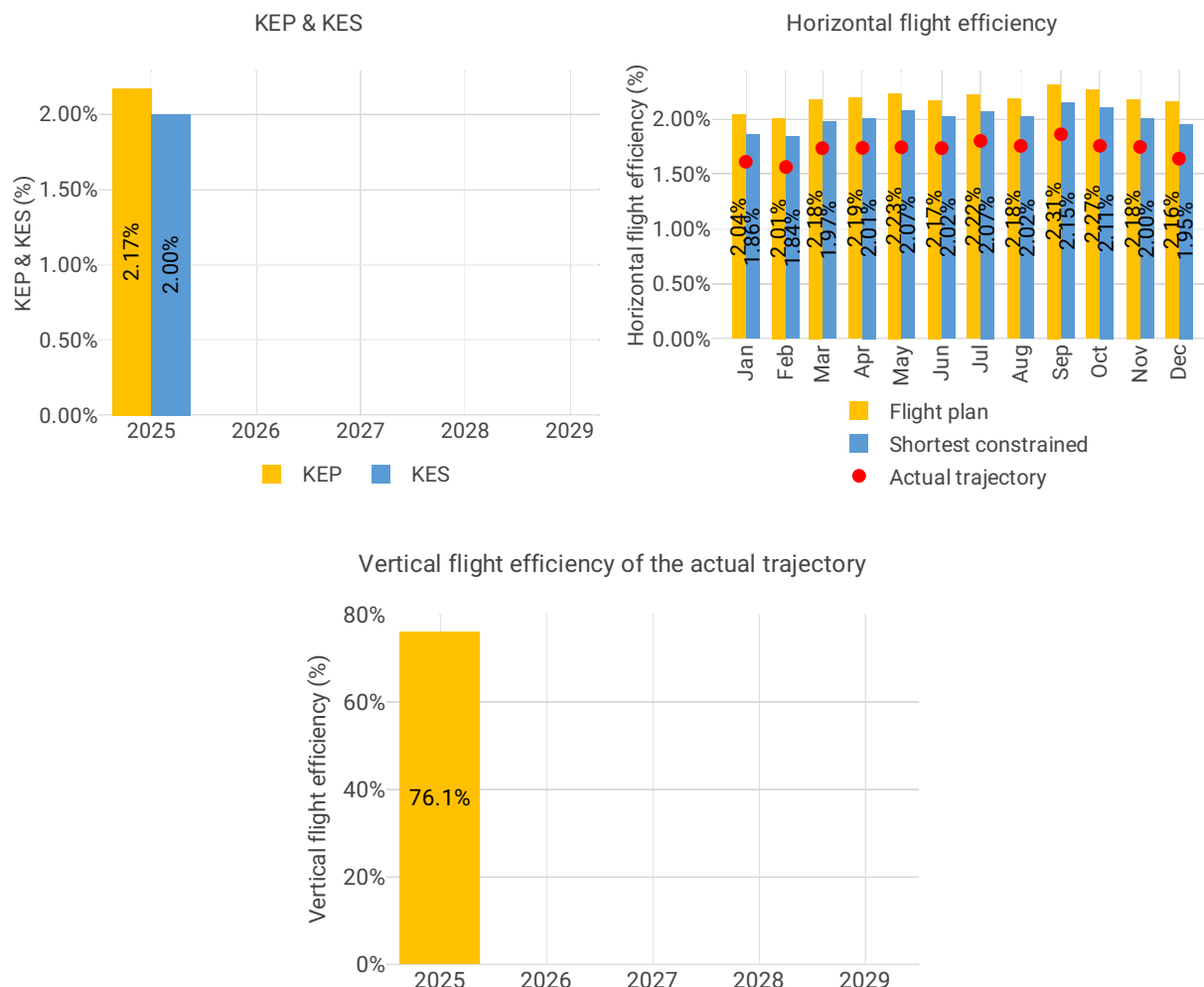
3.1 PRB monitoring

- Portugal registered a KEA performance of 1.71%. Their target of 1.48% was not achieved and Portugal did not contribute positively to Union-wide performance. The NSA states that the deviation from the target may be linked to the new Point Merge system, whose impact was not fully anticipated at the time the performance plan was established.
- Both KEP and KES deteriorated in comparison with 2024.
- VFE of the actual en route trajectory was at 76.08%, which was similar to the average Union-wide performance.
- The average time in level flight during descent deteriorated and during climb remained stable with minor deterioration compared to 2024.
- Additional taxi-out time was 4.19 min/flight which deteriorated marginally from 4.00 min/flight in 2024, and additional taxi-in time was 1.76 min/flight which deteriorated from 1.62 min/flight in 2024.
- Additional time in the arrival sequencing and metering area deteriorated to 4.70 min/flight from 4.27min/flight in 2024.

3.2 En route performance

3.2.1 Horizontal flight efficiency of the actual trajectory (KEA) (KPI#1), of the last filed flight plan (KEP) (PI#1) , shortest constrained route (KES) (PI#2) and vertical flight efficiency of the actual trajectory (VFE) (PI#3)





Focus on en route performance

KEA

Due to its geographical position, the values of KEA and the KEA corrected for the influence of the war in Ukraine are essentially the same. There has been a degradation from 2023 to 2025, with KEA moving from 1.50% in 2023 to 1.61% in 2024 to 1.71% in 2025. These values place Portugal in the top 10 performing States (in 2025, 7th for KEA and 10th for corrected KEA).

The contribution to the overall additional distance is 2.10%, making Portugal the 17th lowest.

Regarding the assessment of the achieved level of actual performance in the environment KPA, the NSA reports: *“A high-level analysis indicates that the KEA indicator has been deteriorating since May 2024, reaching its peak deviation at the end of 2025, with a difference of 0.2 percentage points compared to 2024 (1.5). However, data for 2025 already shows signs of stabilization. The ambitious RP4 targets were defined considering a new cross-border free route scenario, which has proven challenging due to limited progress in cross-border interfaces with adjacent airspaces (Madrid and Brest/Bordeaux UIRs), thereby constraining the expected trajectory improvements.*

Additionally, a contributing factor to this deviation may be linked to the implementation of the Point Merge system, whose impact was not fully anticipated at the time the Performance



Plan was established. Nevertheless, ongoing monitoring indicates that the degradation of this indicator has stabilized. Despite the gap between the 2025 target and the actual value, Lisbon FIR continues to rank among the top 10 KEA regions within the Eurocontrol area.”

Regarding the implementation of major operational or structural changes during the calendar year impacting performance in this key performance area, the NSA reports: *“Yes, a relevant operational change impacting performance in the Environment KPA was the implementation of the Point Merge system, which became operational in May 2024. This new arrival management technique aimed to improve traffic sequencing and predictability in the terminal area.*

While the system contributes to operational efficiency and capacity management, its impact on flight trajectories was not fully anticipated at the time the Performance Plan was prepared. In particular, some effects on horizontal flight efficiency (KEA indicator) have been observed, contributing to the deviation from planned targets.

Nevertheless, ongoing monitoring indicates that these impacts have stabilized over time, and the system continues to support overall operational improvements in a growing traffic environment.”

Regarding progress on the implementation of the measures committed to in the ERNIP, the NSA reports: *“Progress on the implementation of the measures committed to in the ERNIP has been limited, particularly for those initiatives expected to have a significant impact on KEA performance. This is mainly related to the development of cross-border free route interfaces with adjacent airspaces, namely Morocco (Agadir ACC), Spain (Madrid ACC and Canary Islands FIR), and France (Brest and Bordeaux FIR), where progress has been slower than anticipated.*

At the same time, internal initiatives such as improvements to the Point Merge System project are ongoing and contribute to optimizing operations.”

Regarding the identification and analysis by the NSA of the underlying reasons or circumstances having led to the performance target not being achieved, the NSA reports: *“The analysis carried out by the NSA indicates that the deviation from the performance target is mainly linked to a combination of external and operational factors. In particular, the limited progress in the implementation of cross-border Free Route Airspace interfaces with adjacent ANSPs. Additionally, certain operational changes, such as the implementation of new arrival management solution (Point Merge System), introduced effects that were not fully anticipated at the time of target setting.*

These elements, combined with a high and evolving traffic demand, have contributed to the observed gap between planned and actual performance. Nevertheless, monitoring indicates that the situation has stabilized.”

Regarding recommendations to the ANSP to rectify the situation, the NSA reports: *“The NSA recommends that the ANSP continues its efforts to monitor performance and implement appropriate operational improvements, with a focus on ensuring alignment with the established targets. Ongoing attention should be given to identifying and addressing relevant factors affecting performance, while maintaining effective coordination with stakeholders and supporting a continuous improvement approach.”*



Regarding remedial measures that have been / will be taken by the ANSP to rectify the situation, the NSA reports: *“Considering that recent monitoring indicates a stabilization in the degradation of the indicator, no specific remedial measures are foreseen at this stage. The NSA and the ANSP will continue to closely monitor performance trends to ensure that the situation remains stable and to identify any need for corrective actions, should new developments arise.”*

Regarding the follow up of the remedial measures indicated in the previous monitoring report(s), the NSA reports: *“Implementation of new Middle Traffic Volumes in critical sectors expected along 2026. Already finished, and recently validated by the NM, of a complete new full airspace restructuration to better accommodate future cross-border free-route trajectories and a better capacity management. The implementation will take place in different phases aligned with traffic increase forecast.”*

KEP

Regarding initiatives implemented or planned that will improve this PI and how does the NSA intend on monitoring their effectiveness on performance, the NSA reports: *“Since introducing Free Route Operations in Lisbon FIR (May 2009), NAV Portugal has consistently coordinated with neighboring regions and Eurocontrol to create cross-border free-route interfaces for our main traffic flows (Spain, France, and Morocco). While Lisbon FIR remains fully prepared for cross-border expansion, our neighbors are currently managing their own internal FRA deployment schedules. The varied pace of these internal initiatives naturally impacts the timeline for achieving a synchronized cross-border Free Route environment with Lisbon FIR.”*

KES

Regarding initiatives implemented or planned that will improve this PI and how does the NSA intend on monitoring their effectiveness on performance, the NSA reports: *“Since introducing Free Route Operations in Lisbon FIR (May 2009), NAV Portugal has consistently coordinated with neighboring regions and Eurocontrol to create cross-border free-route interfaces for our main traffic flows (Spain, France, and Morocco). While Lisbon FIR remains fully prepared for cross-border expansion, our neighbors are currently managing their own internal FRA deployment schedules. The varied pace of these internal initiatives naturally impacts the timeline for achieving a synchronized cross-border Free Route environment with Lisbon FIR.”*

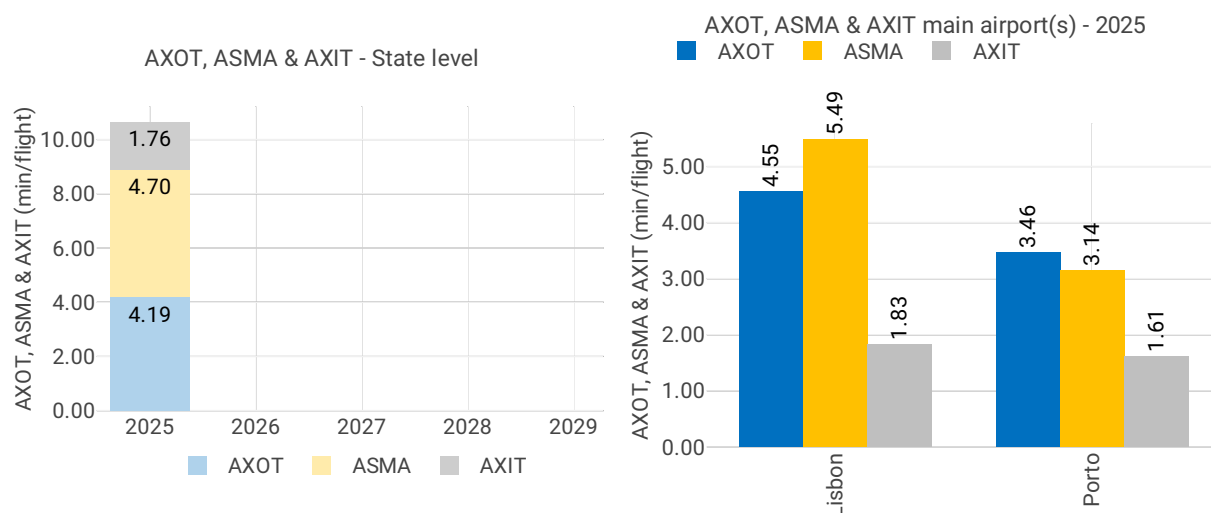
Vertical flight efficiency

No comment provided.



3.3 Terminal performance

3.3.1 Additional taxi-out time (AXOT) (PI#4), Additional taxi-in time (AXIT) (PI#5) & Arrival Sequencing and Metering Area (ASMA) time (PI#6)



Airport level															
	Additional taxi-out time (PI#4)					Additional ASMA time (PI#6)					Additional taxi-in time (PI#5)				
Airport	2025	2026	2027	2028	2029	2025	2026	2027	2028	2029	2025	2026	2027	2028	2029
Lisbon	4.55	NA	NA	NA	NA	5.49	NA	NA	NA	NA	1.83	NA	NA	NA	NA
Porto	3.46	NA	NA	NA	NA	3.14	NA	NA	NA	NA	1.61	NA	NA	NA	NA

Focus on AXOT, AXIT & ASMA

AXOT

Lisbon and Porto are the only Portuguese airports subject to the monitoring of this indicator.

The additional time in Lisbon in 2025 increased to 4.55 min/dep, 6% above the 2024 value – last year of RP3 – of 4.29 min/dep (*using the new methodology*). This is the third highest value among airports subject to RP4 monitoring.

The additional time in Porto in 2025 was equal to 3.46 min/dep, very close to 2024 value – last year of RP3 – of 3.37 min/dep (*using the new methodology*).

The average for RP4 airports subject to monitoring of this indicator across Member States in 2025 was 3.61 min/dep.

AXIT

Lisbon and Porto are the only Portuguese airports subject to the monitoring of this indicator.

The additional time in Lisbon in 2025 was equal to 1.83 min/arr, and in Porto to 1.61 min/arr.

The average for RP4 airports subject to monitoring of this indicator across Member States in 2025 was 1.71 min/arr.



ASMA

Lisbon and Porto are the only Portuguese airports subject to the monitoring of this indicator.

The additional time in Lisbon in 2025 increased to 5.49 min/arr, 13% above the 2024 value – last year of RP3 – of 4.86 min/arr (*using the new methodology*). This is the second highest value among airports subject to RP4 monitoring.

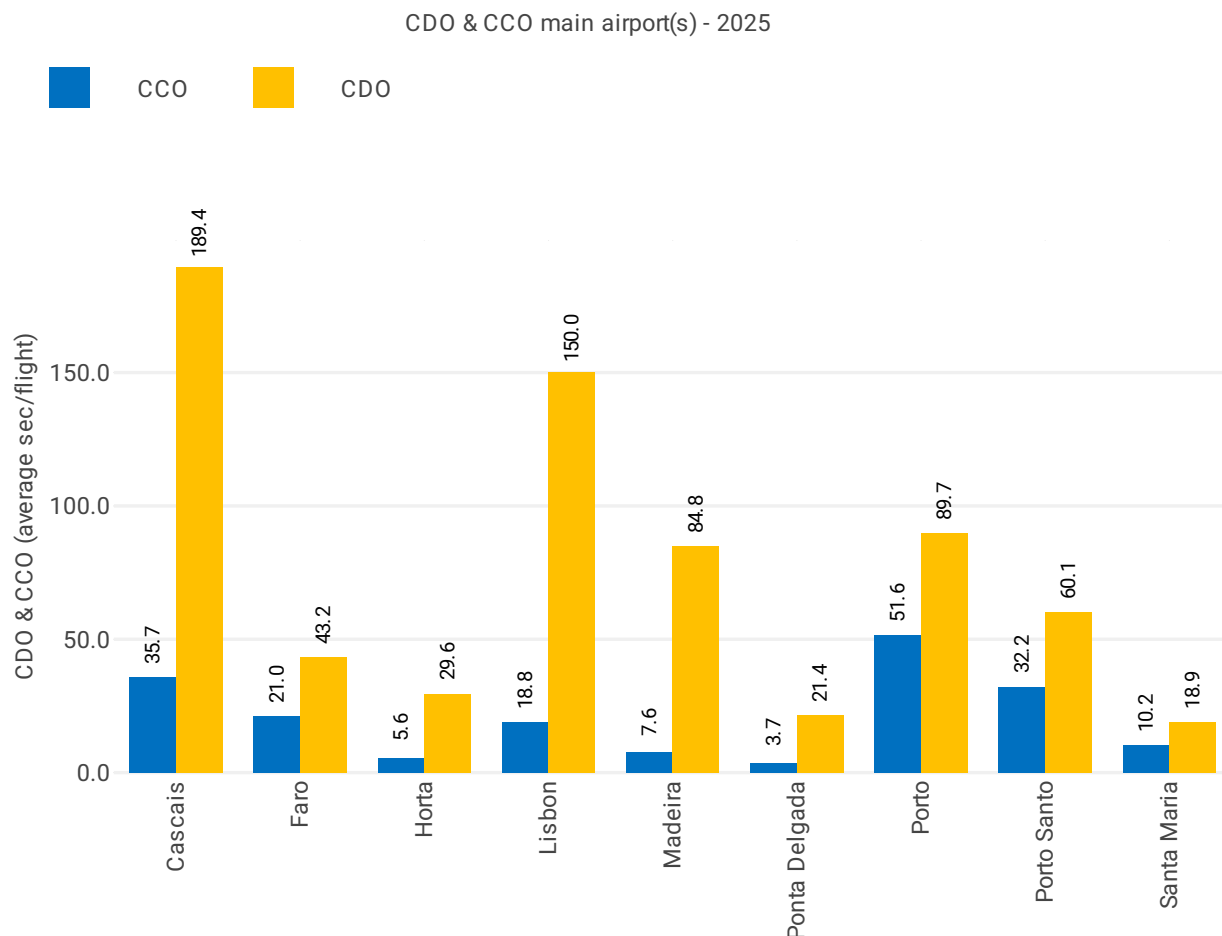
The additional time in Porto in 2025 increased to 3.14 min/arr, 4% above the 2024 value – last year of RP3 – of 3.01 min/arr (*using the new methodology*).

The average for RP4 airports subject to monitoring of this indicator across Member States in 2025 was 2.98 min/arr.

Regarding initiatives implemented or planned that will improve this PI and how does the NSA intend on monitoring their effectiveness on performance, the NSA reports: *“While the implementation of the Point Merge System (PMS) at Lisbon Airport has successfully delivered a significant increase in airspace capacity and enhanced controller workload predictability, it has inherently affected horizontal flight efficiency. This is reflected in an increase in Eurocontrol’s ASMA metric, driven by the longer trajectories required for sequencing within the Point Merge structure. To mitigate this operational trade-off, NAV Portugal is actively developing targeted airspace restructuring projects aimed at optimizing these flight profiles and improving ASMA performance.”*



3.3.2 Vertical flight efficiency of the descent (PI#7) and of the climb (PI#8)



Focus on vertical flight efficiency of the descent and of the climb

Vertical flight efficiency of the descent

Compared to the overall RP4 average value (149.2 seconds per flight), average times flown level during descent are on average 41.1 seconds per flight lower in Portugal. The highest average time flown level during descent happens at Cascais (LPCS) (189.4 seconds per flight), while the lowest happens at Santa Maria (LPAZ) (18.9 seconds per flight).

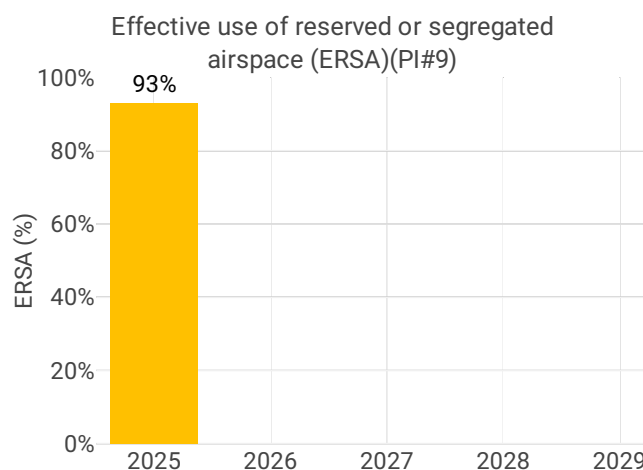
Vertical flight efficiency of the climb

Compared to the overall RP4 average value (34.8 seconds per flight), average times flown level during climb are on average 9.5 seconds per flight lower in Portugal. The highest average time flown level during climb happens at Porto (LPPR) (51.6 seconds per flight), while the lowest happens at Ponta Delgada (LPPD) (3.7 seconds per flight).

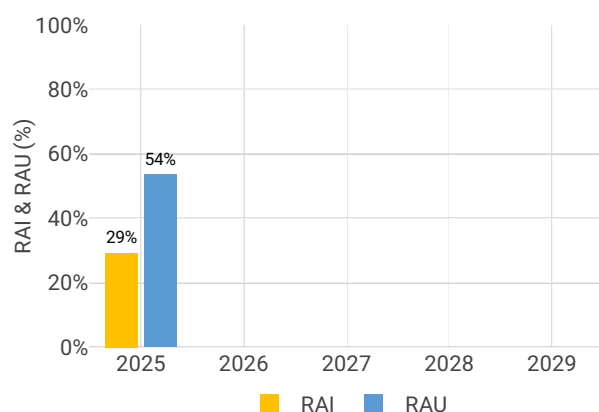


Airport level										
	Avg. duration in climb (PI#8)					Avg. duration in descent (PI#7)				
Airport	2025	2026	2027	2028	2029	2025	2026	2027	2028	2029
Santa Maria	10.2	NA	NA	NA	NA	18.9	NA	NA	NA	NA
Cascais	35.7	NA	NA	NA	NA	189.4	NA	NA	NA	NA
Faro	21.0	NA	NA	NA	NA	43.2	NA	NA	NA	NA
Horta	5.6	NA	NA	NA	NA	29.6	NA	NA	NA	NA
Madeira	7.6	NA	NA	NA	NA	84.8	NA	NA	NA	NA
Ponta Delgada	3.7	NA	NA	NA	NA	21.4	NA	NA	NA	NA
Porto	51.6	NA	NA	NA	NA	89.7	NA	NA	NA	NA
Porto Santo	32.2	NA	NA	NA	NA	60.1	NA	NA	NA	NA
Lisbon	18.8	NA	NA	NA	NA	150.0	NA	NA	NA	NA
Flores	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

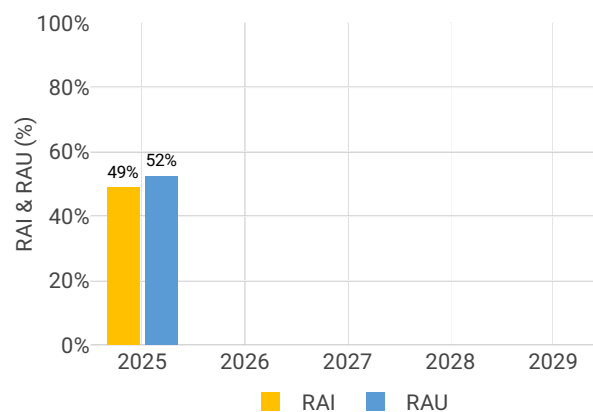
3.4 Civil-Military dimension



RAI & RAU via available conditional routes (PIs#10 & 11)



RAI & RAU via available restricted and segregated airspace (PIs#10 & 11)



Focus on Civil-Military dimension

Effective use of reserved or segregated local airspace

PORTUGAL, no data received or communicated.



Rate of planning via available airspace structures

PORTUGAL, no data received.

Rate of using available airspace structures

PORTUGAL, no data received.



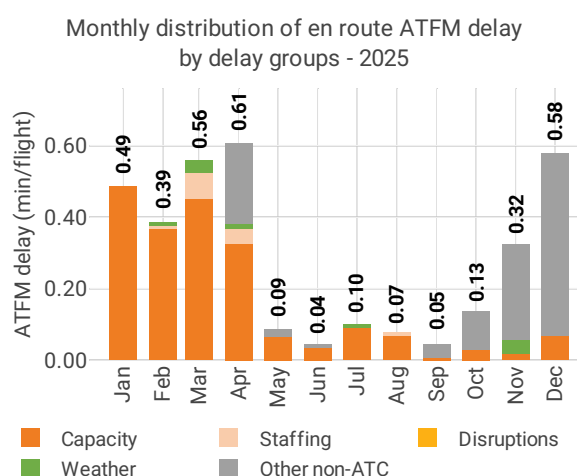
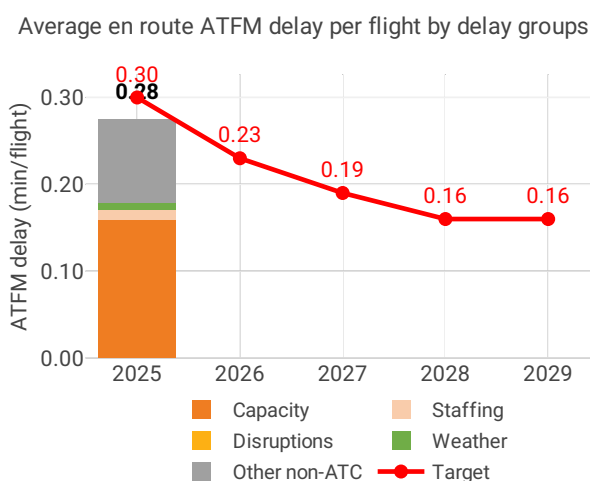
4 CAPACITY - PORTUGAL

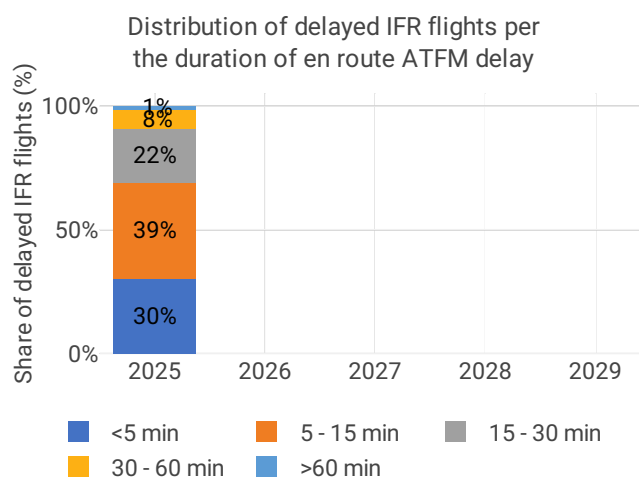
4.1 PRB monitoring

- Portugal registered 0.28 minutes of average en route ATFM delay per flight during 2025, which remained 0.28 after the post-ops adjustment process, thus achieving the local target value of 0.30. Delays in Portugal decreased by -0.11 minutes per flight year-on-year.
- Delays were highest in January to April, mostly driven by ATC capacity, and in November and December due to non-ATC causes.
- The share of delayed flights with delays longer than 15 minutes in Portugal decreased by -5 percentage points compared to 2024.
- The number of ATCOs in OPS was 174 being below the 2025 plan in Lisbon ACC by -6 FTE.
- The yearly total of sector opening hours in Lisbon ACC was 70,152, showing a 2% increase compared to 2024.
- Lisbon ACC registered 10.06 IFR movements per sector opening hour in 2025 4% above the 2024 level.
- Portugal registered an average airport arrival ATFM delay of 1.88 minutes per flight in 2025, thus achieving the local target of 2.19 minutes. Compared to 2024, average arrival ATFM delays in Portugal were -0.82 minutes per flight lower higher in 2025.
- The main drivers of delays were weather, accounting for 1.33 of the total delays, and other non-ATC causes, responsible for 0.47.

4.2 En route performance

4.2.1 En route ATFM delay (KPI#1)





Focus on en route ATFM delay

En route ATFM delay

- Portugal (Continental) had 762k flights in 2025, up from 723k flights in 2024.
- Nav Portugal applied en route ATFM regulations resulting in 209k minutes of delay, a reduction from the 283k minutes in 2024.
- As part of the strategic traffic re-orientation programme (S25/NTDM), and the use of RN scenarios during Capacity & Weather Based Operations, both operated by the Network Manager, <1k minutes of delay originating in Portugal were re-attributed to other ANSPs.
- When the above post-operations re-attribution is factored in, the total en route delay for Nav Portugal in 2025 was 209k minutes in 2025 down from 282k minutes in 2024.

Regarding the reasons and circumstances resulting in the achieved level of actual performance of the en route ATFM delay per flight KPI, the NSA reports: *“The achieved level of performance for the en-route ATFM delay per flight KPI demonstrates a sustained alignment between capacity provision and traffic demand, with the actual delay remaining below the applicable reference value. This outcome reflects the effectiveness of the capacity planning and ATFCM measures implemented, ensuring that delays were overall contained despite continued traffic growth above the STATFOR forecast.*

The main contributors to delays were structural ATC capacity constraints during peak demand periods, which represent the predominant driver of en-route ATFM delay. Additional contributions arose from special events and, to a lesser extent, staffing and weather-related factors. Furthermore, a share of the delay was attributable to exceptional external circumstances, namely a large-scale power outage affecting the Iberian Peninsula. This event had a direct impact on operational continuity and contributed to the overall delay figures. Without this extraordinary occurrence, performance would have been further improved.

Significant operational and structural improvements were implemented in Lisboa ACC to address capacity needs and mitigate delays. These included the progressive optimisation of sector configurations, enabling the availability of additional sectors and increased sector capacity, supported by continuous ATCO recruitment and flexible rostering. In parallel, airspace design enhancements—such as the evolution of the Point Merge System—and the implementation of



enhanced ATFCM measures (including STAM and participation in the Network Manager occupancy regulation trial) contributed to improving traffic flow management and overall network performance.

As a result, capacity provided during critical periods, particularly in IATA summer, was generally sufficient to meet actual traffic demand. This confirms that the combination of structural capacity measures and dynamic ATFCM measures has been effective in mitigating delay generation and supporting the achievement of the en-route delay performance target in line with PRB expectations."

Regarding the description of the adjustments to the capacity plan included in adopted performance plan, the NSA reports: *"The adjustments to the capacity plan included in the adopted performance plan were primarily driven by the need to accommodate sustained traffic growth and mitigate the risk of delay generation during peak demand periods. These adjustments focused on reinforcing the alignment between declared capacity and evolving traffic patterns, while ensuring consistency with network-level objectives and coordination with the Network Manager.*

A key element of the adjustments was the optimisation of sector configurations within Lisboa ACC, enabling the progressive opening of additional sectors and increasing the capacity of existing ones. This was supported by continued ATCO recruitment and qualification, as well as the application of flexible rostering practices to maximise the availability of operational resources during high-demand periods. These measures allowed for a more dynamic and scalable capacity provision in response to traffic variability.

In parallel, the capacity plan was strengthened through targeted airspace and operational improvements. These included enhancements to airspace design—such as the further development of the Point Merge System—and the implementation of advanced ATFCM measures aimed at improving traffic flow efficiency. In particular, participation in the Network Manager occupancy regulation trial and the systematic use of STAM measures contributed to a more balanced distribution of traffic demand and a reduction of congestion hotspots."

Regarding follow up of the remedial measures indicated in the previous monitoring report(s), the NSA reports: *"The remedial measures agreed with the ANSP in 2024 are being prepared as most of them are supposed to be implemented along RP4. Concerning ATCO recruitment NAV has maintained full training classes each year, with very good approval rates, allowing for the ATCO gap to start to narrow.*

As for the split of West and Central sectors, the implementation in Central sector is already in place, and in the West sector it is about to start, missing only radio frequency availability, which is expected in October.

Finally, the restructuring of airspace is continuing, in a joint effort of NAV and Eurocontrol."

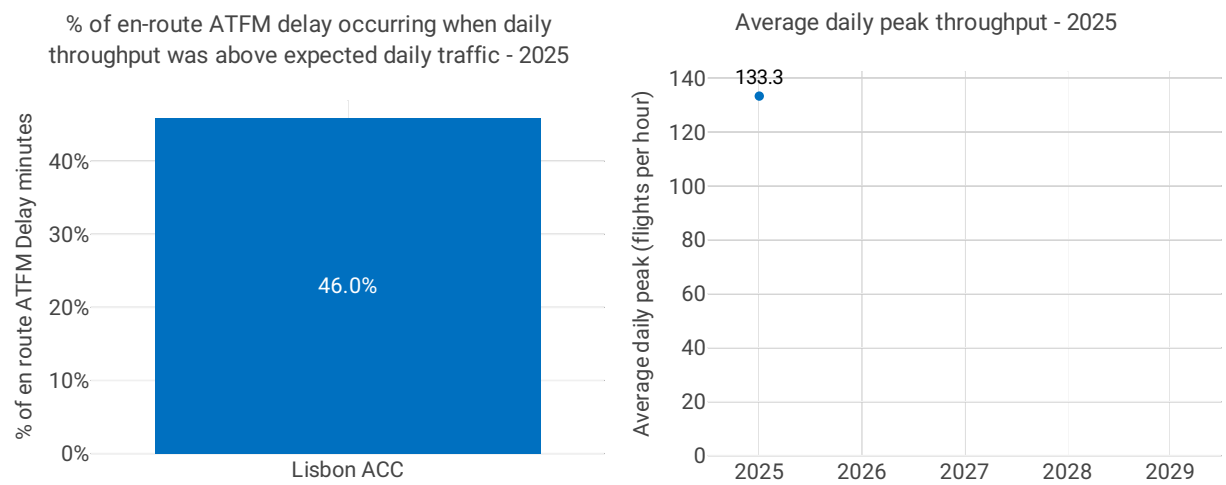
En route capacity incentive scheme

The Portuguese NSA reports neither a financial penalty, nor financial bonus, for Nav Portugal because of the 2025 performance. The local incentive target for en route ATFM delays, due to CRSTMP causes only, was set at 0.29 mins/flight, with a deadband range between 0.25 – 0.33 mins/flight.

The NSA reports an achieved CRSTMP performance of 0.26 mins/flight, within the deadband range, but does not report how the actual value was verified. [NB The attribution of original delay causes on the ansperformance.eu dashboard is unverified]



4.2.2 En route performance indicators at ACC level (PI#4-5)



Focus en route performance indicators at ACC level

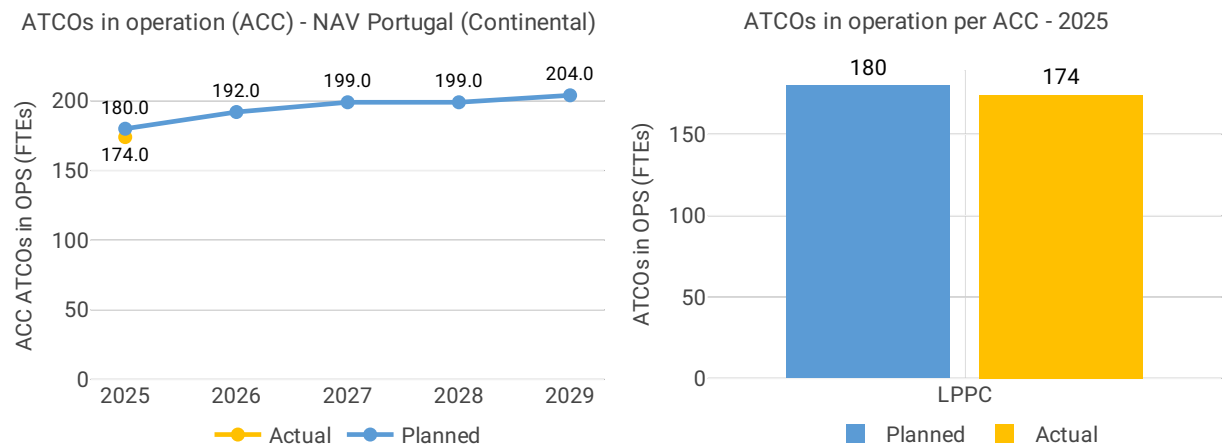
Percentage of total en route ATFM delay that occurred on days when the daily throughput was above the expected daily traffic

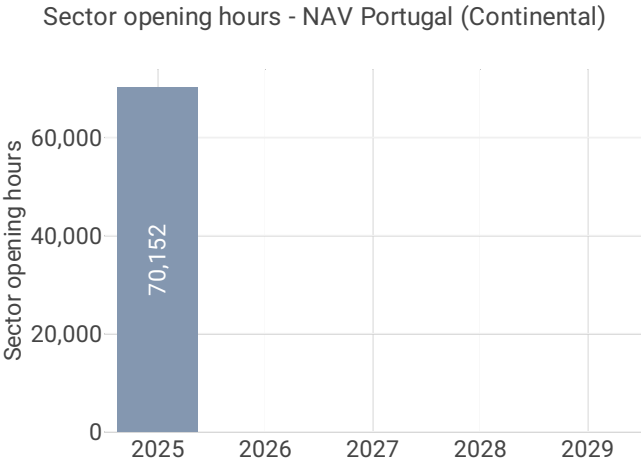
No comment provided.

Annual weighted average of the daily peak throughput

No comment provided.

4.2.3 Other en route information





Focus on other en route information

As additional comments to ATCOs in the scope of the performance scheme, the NSA reports: *“NAV Portugal's efforts in recruiting and training new air traffic controllers have yielded positive results this year, as the initial gap between the actual and planned number of FTEs has been narrowed. It should be noted that the difference in the number of ATCOs in OPS, results mainly from the performance in 2024, when NAV ended the year 5 ATCOs short of expected. In 2025, NAV was only 1 ATCO short of initial estimates.”*

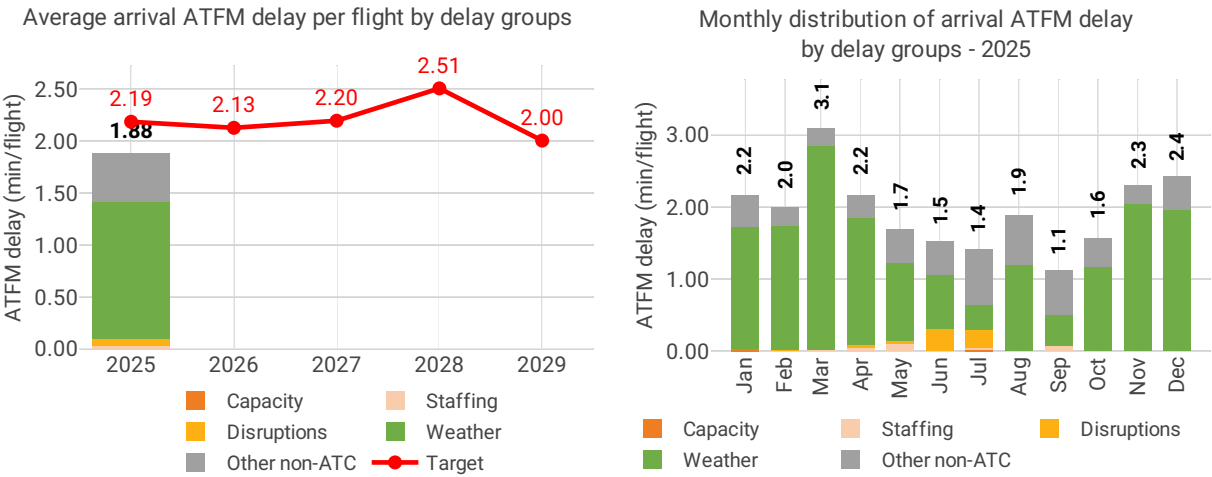
“Very similar numbers of air traffic controller movements throughout the year.”

Regarding the training process, including details on the effective failure rate and the process used to allocate newly qualified ATCOs between ACC, APP and TWR positions, the NSA reports: *“In this section, the total values for NAV Portugal were considered.*

While the first two lines refer to ab-initio training, the third line – Number of air traffic controller trainees at the end of the year – reports the on-job-trainees, of which 5 come from the ATC-FI 029 training course and 11 from the ATC-FI 030 training course.”

4.3 Terminal performance

4.3.1 Arrival ATFM delay (KPI#2)



Focus on arrival ATFM delay

Arrival ATFM delay

Average ATFM arrival delay in Portugal was 1.88 min/arr in 2025, the first year of RP4. The performance has improved compared to 2024, last year of RP3, when there were 2.70 min/arr. This represents a 30% reduction in average.

Both of the main airports in RP4 contributed to this reduction:

- Lisbon, from 4.20 min/arr to 2.83 min/arr in 2025 thanks to reductions in Aerodrome and ATC Capacity regulations, reached its target of 3.78 min/arr.
- Porto, from 3.02 min/arr to 2.45 min/arr mostly due to reductions in Weather regulations, although still not meeting its target of 1.57 min/arr.

Except Madeira (0.31 min/arr), other airports had zero or almost zero ATFM arrival delay, including Cascais which improved from 0.92 min/arr to zero.

The average for RP4 airports subject to monitoring of ATFM Arrival delay across Member States in 2025 was 0.97 min/arr.

Regarding the reasons and circumstances resulting in the achieved level of actual performance of the arrival ATFM delay per flight KPI, the NSA reports: *“The achieved level of performance for the arrival ATFM delay KPI reflects a combination of effective local and network measures, together with specific operational constraints affecting airport and airspace capacity. Overall, the actual ATFM arrival delay remained below the national reference value (-0,31min/flight) demonstrating a generally effective alignment between traffic demand and available capacity.*

The main contributors to arrival ATFM delay were predominantly linked to ATFM regulations associated with weather (W) and aerodrome capacity (G), which together account for the vast majority of delay generation in the terminal environment. The post-operations analysis clearly indicates that these two causes represent more than 93% of the total arrival ATFM delay, confirming that delay performance is primarily driven by causes outside the control of the ANSP

Weather-related factors (W) play a particularly significant role in the generation of arrival delays, especially at the main airports. The impact of adverse meteorological conditions— affecting runway configurations, arrival sequencing and spacing—has been a recurring driver of delay, with a particularly strong effect observed in Lisboa, Porto and Madeira.

In parallel, aerodrome capacity constraints (G) constitute the other dominant contributor to arrival ATFM delays. These are associated with structural airport limitations, including runway throughput, stand availability and operational constraints affecting arrival flow management. The data shows that these constraints generate a significant share of the regulated delay, particularly at high-demand airports such as Lisboa and Porto, where demand peaks frequently require the application of ATFM arrival regulations to maintain safe and orderly operations.

Notwithstanding these constraints, the performance achieved at Lisboa demonstrates a strong level of operational efficiency. Arrival delay per flight remained consistently below the applicable KPI values, reflecting the positive impact of capacity and efficiency improvements, notably



the implementation and progressive enhancement of the Point Merge System (PMS), combined with other operational measures to optimise arrival sequencing and traffic handling.”

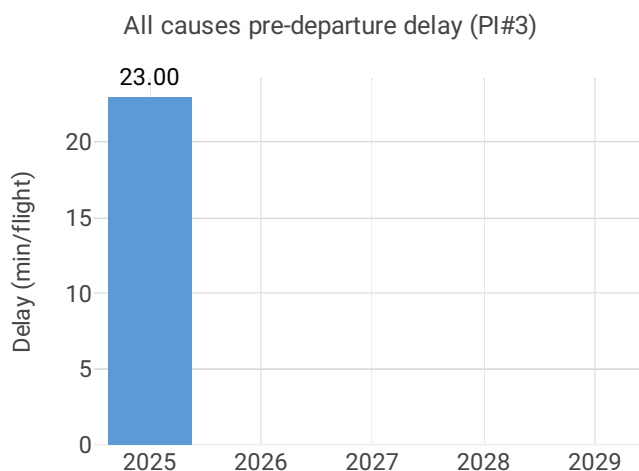
Regarding follow up of the remedial measures indicated in the previous monitoring report(s), the NSA reports: *“Building on measures from previous years, particularly the strengthened collaboration with LPPT, it was possible to identify a source of delays related to airport slot allocation. A more detailed analysis revealed specific traffic peaks, indicating that mitigation actions may include the introduction of a sub-parameter defining a maximum number of slots within a rolling hour. This potential solution is currently under evaluation. This ongoing cooperation continues to support the identification and implementation of targeted improvements in operational performance.”*

Terminal capacity incentive scheme

In the first year of RP4, with an ATFM arrival delay of 1.88 min/arr, Portugal achieved the national target of 2.19 min/arr. However, the pivot value for incentives indicated by the Member State, 0.39 min/arr*, is limited to CRSTMP delay causes. As CRSTMP delay of 0.102 min/arr falls beyond the end of the bonus sliding range for the incentive scheme, meaning that the maximum bonus of 1.0% applies. As such, the NSA computes a bonus of EUR 519.77.

*Note that the Performance Plan of the State indicates a higher pivot value of 0.55 min/arr. Nevertheless, given the performance is beyond the end of the bonus sliding range even with a pivot value of 0.39 min/arr, there is no financial impact due to this variation.

4.3.2 Other terminal performance indicators (PI#1-3)



Airport level										
	Avg arrival ATFM delay (KPI#2)					Slot adherence (PI#1)				
Airport name	2025	2026	2027	2028	2029	2025	2026	2027	2028	2029
Cascais	0.00	NA	NA	NA	NA	98.0%	NA	NA	NA	NA
Faro	0.02	NA	NA	NA	NA	97.0%	NA	NA	NA	NA
Horta	0.00	NA	NA	NA	NA	95.2%	NA	NA	NA	NA
Lisbon	2.83	NA	NA	NA	NA	97.5%	NA	NA	NA	NA
Madeira	0.31	NA	NA	NA	NA	96.9%	NA	NA	NA	NA
Ponta Delgada	0.00	NA	NA	NA	NA	90.7%	NA	NA	NA	NA
Porto	2.45	NA	NA	NA	NA	96.7%	NA	NA	NA	NA
Porto Santo	0.00	NA	NA	NA	NA	96.6%	NA	NA	NA	NA
Santa Maria	0.00	NA	NA	NA	NA	88.5%	NA	NA	NA	NA

	ATC pre departure delay (PI#2)					All causes pre departure delay (PI#3)				
Airport name	2025	2026	2027	2028	2029	2025	2026	2027	2028	2029
Lisbon	5.54	NA	NA	NA	NA	25.5	NA	NA	NA	NA
Porto	0.61	NA	NA	NA	NA	17.9	NA	NA	NA	NA

Focus on other terminal performance indicators

ATFM slot adherence

ATFM slot adherence in 2025 was equal to 97.0%, very close to 2024 value – last year of RP3 – of 97.1%. The three largest airports (Lisbon, Porto, Faro) all had adherence above 96.5%. Santa Maria was the airport with the lowest adherence, 88.5%, still well above the standard target of 80%.

With regard to the 3.0% of flights that did not adhere across the country, 2.4% were early and 0.6% were late.

The average for RP4 airports subject to monitoring of ATFM slot adherence across Member States in 2025 was 96.3%.

As background information on actual performance, the NSA reports: *“Overall there was no significant variation.”*

ATC pre-departure delay

Lisbon and Porto are the only Portuguese airports subject to the monitoring of this indicator.

In Lisbon, delay in 2025 increased to 5.54 min/dep, 21% higher than 2024 value– last year of RP3 – of 4.59 min/dep. This is the highest across all airports monitored in RP4.

In Porto, delay in 2025 decreased to 0.69 min/dep, almost equal to 2024 value– last year of RP3 – of 0.61 min/dep.

The average for RP4 airports subject to monitoring of ATC pre-departure delay across Member States and for which enough data is available in 2025 was 0.74 min/dep.



All causes pre-departure delay

Lisbon and Porto are the only Portuguese airports subject to the monitoring of this indicator.

In Lisbon, delay in 2025 increased to 25.52 min/dep, 9% higher than 2024 value– last year of RP3 – of 23.35 min/dep. This is the highest across all airports monitored in RP4.

In Porto, delay in 2025 decreased to 17.86 min/dep, 11% lower than 2024 value– last year of RP3 – of 20.13 min/dep.

The average for RP4 airports subject to monitoring of all causes pre-departure delay across Member States in 2025 was 16.47 min/dep.



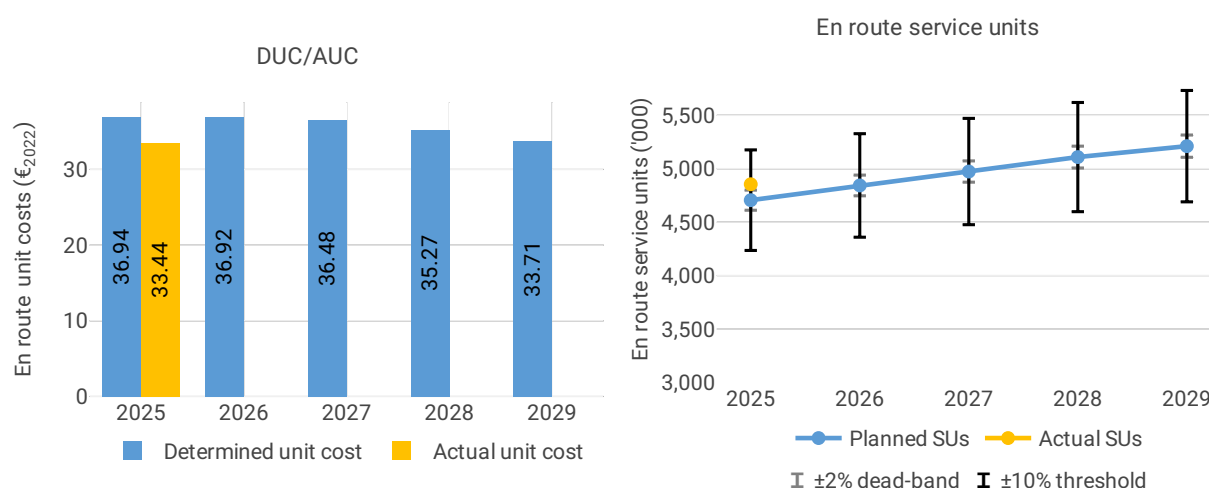
5 COST-EFFICIENCY - PORTUGAL

5.1 PRB monitoring

- The en route 2025 actual unit cost of Portugal was 33.44€2022, -9.5% lower than the determined unit cost (36.94€2022). The terminal 2025 actual unit cost was 133.14€2022, -7.4% lower than the determined unit cost (143.72€2022).
- The en route 2025 actual service units (4.9M) were +3.2% higher than the determined service units (4.7M).
- The en route 2025 actual total costs were -11.5M€2022 (-6.6%) lower than determined with all cost categories registering lower-than-planned costs, except depreciation. This is mainly due to lower staff costs for NAV Portugal (-10.0M€2022, or -8.9%). The NSA explained that this decrease is partly driven by favourable financial market conditions, which had a positive impact on the defined benefit pension fund.
- NAV Portugal spent 25.3M€2022 in 2025 related to costs of investments for both en route and terminal charging zones, -3.9% less than determined (26.3M€2022). According to the NSA, this reduction is due to a smaller asset base.
- The en route actual unit cost incurred by users in 2025 was 37.68€ (-5.5% below the 2025 DUC), while the terminal actual unit cost incurred by users was 151.68€ (-3.0% below the 2025 DUC). The difference between the AUCU and the DUC for the en route and terminal charging zones is mainly driven by pension costs in cost exempt from cost sharing.

5.2 En route charging zone

5.2.1 Unit cost (KPI#1)



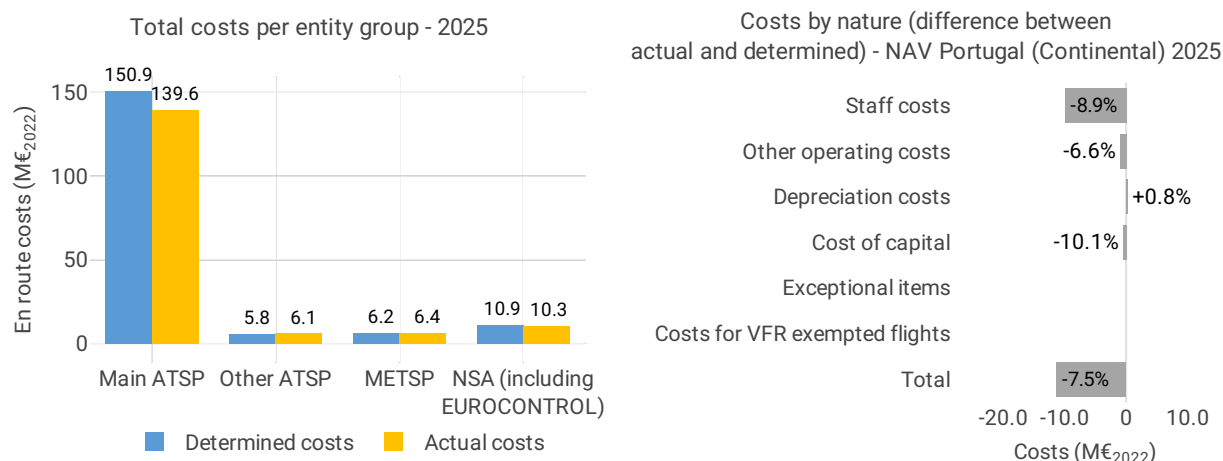
Actual and determined data

Total costs - nominal (M€)	2025	2026	2027	2028	2029
Determined costs	187.5	196.2	202.2	204.6	203.9
Actual costs	175.9	NA	NA	NA	NA
Difference costs	-11.6	NA	NA	NA	NA



Inflation assumptions	2025	2026	2027	2028	2029
Determined inflation rate	2.0%	2.0%	2.0%	2.0%	2.0%
Determined inflation index*	109.8	112.1	114.3	116.7	119.1
Actual inflation rate	2.2%	NA	NA	NA	NA
Actual inflation index*	110.5	NA	NA	NA	NA
Difference inflation index (p.p.)	+0.7	NA	NA	NA	NA

*100 = 2022



Focus on unit cost

AUC vs. DUC

In 2025, the en route AUC was -9.5% (or -3.50 €2022) lower than the planned DUC. This results from the combination of significantly lower than planned en route costs in real terms (-6.6%, or -11.5 M€2022) and higher than planned TSUs (+3.2%).

En route service units

The difference between actual and planned TSUs (+3.2%) falls outside the $\pm 2\%$ dead-band, but does not exceed the $\pm 10\%$ threshold foreseen in the traffic risk sharing mechanism. The resulting gain of additional en route revenues is therefore shared between the ANSP and the airspace users (see the main ANSP regulatory result).

En route costs by entity

Actual real en route costs are -6.6% (-11.5 M€2022) lower than planned. This is the result of lower costs for the main ANSP, NAV Portugal (-7.5%, or -11.4 M€2022) and the NSA/EUROCONTROL (-5.2%, or -0.6 M€2022), and higher costs for the MET service providers (+3.2%, or +0.2 M€2022) and the other ANSP (Portugal Continental SAR, +4.9%, or +0.3 M€2022).

En route costs for the main ANSP (NAV Portugal (Continental)) at charging zone level

Based on the additional information to the en route reporting tables, the significantly lower than planned en route costs in real terms for NAV Portugal in 2025 (-7.5%, or -11.4 M€2022) result from:

- Significantly lower than planned staff costs (-8.9%), mainly due to significantly lower-than-expected defined benefit pension costs, driven by favourable financial market conditions, while remuneration and other social charges remained in line with plan.



- Significantly lower than planned other operating costs (-6.6%), mainly due to lower electricity prices and reduced expenditure on rent and leasing, maintenance and repairs, and travel, partially offset by increased investment in IT and security.
- Slightly higher than planned depreciation (+0.8%), driven by the commissioning of investments implemented in recent years.
- Significantly lower than planned cost of capital (-10.1%), resulting from a smaller-than-expected asset base.

Assessment of the actual performance in the charging zone reported by the NSA

The NSA of Portugal provides the following overall assessment of the actual performance in 2025 at charging zone level:

“Total en route costs, in real terms, were 6.6% lower than planned, which, combined with a positive deviation of 3.2% in service units, resulted in an actual unit cost 9.5% lower than projected.

This result was achieved mainly due to NAV Portugal, whose actual costs were 7.5% lower than the estimated costs, associated to the performance of defined benefit pension funds, where savings resulting from market factors – approximately 8.5 million euros – will be returned to airspace users in the next year. With the entry into force of Decree-Law No. 75/2024, of October 22, the powers relating to meteorological services for air navigation, which include the certification and supervision of aeronautical meteorological service providers (in this case IPMA), are transferred from GAMA to ANAC.”

Explanation of the differences between actual and determined costs at charging zone level reported by the NSA

The NSA provides the following explanation for the differences between actual and determined costs in the charging zone:

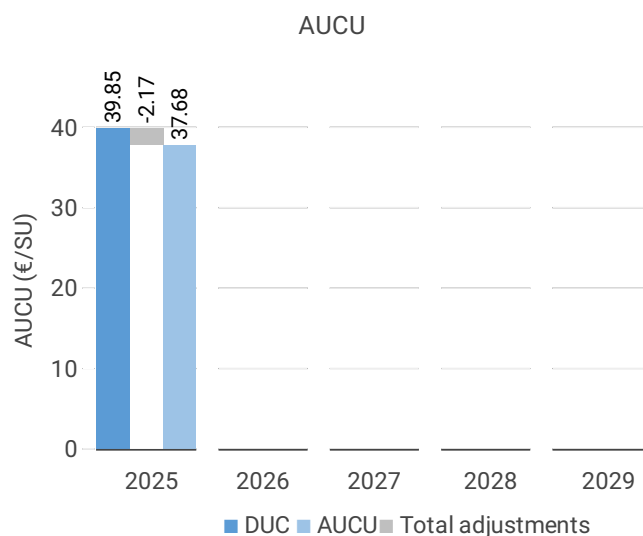
“Actual costs at charging zone level were slightly lower than the determined costs, as justified above but also due to efficiency gains achieved through organizational adjustments. In particular, following the entry into force of Decree-Law No. 75/2024 of October 22, responsibilities related to the certification and supervision of aeronautical meteorological service providers were transferred from GAMA to ANAC. This allowed the same objectives to be achieved with fewer additional resources than initially planned. The situation will continue to be monitored, as the impact of these changes may evolve over the reference period.”

Recommendations formulated by the NSA to the ANSP (NAV Portugal (Continental)) to rectify the situation and actions taken by the ANSP

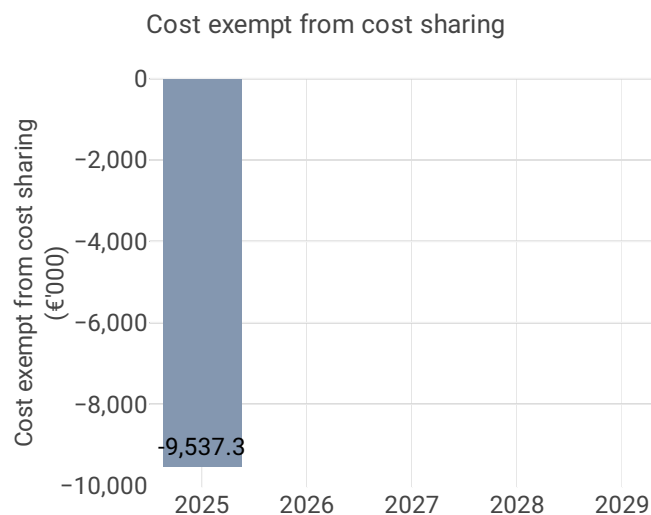
No information was provided in the NSA 2025 Monitoring Report.



5.2.2 Actual unit cost incurred by the users (AUCU) (PI#1)



AUCU components (€/SU) – 2025	
Components of the AUCU in 2025	€/SU
DUC	39.85
Inflation adjustment	0.20
Cost exempt from cost sharing	-1.96
Traffic risk sharing adjustment	-0.28
Traffic adjustment (costs not TRS)	-0.12
Financial incentives	0.00
Modulation of charges	0.00
Cross-financing	0.00
Other revenues	0.00
Application of lower unit rate	0.00
Total adjustments	-2.17
AUCU	37.68
AUCU vs. DUC	-5.5%



Cost exempt from cost sharing – 2025		
Cost exempt from cost sharing by item - 2025	€'000	€/SU
New and existing investments	-460.0	-0.09
Competent authorities and qualified entities costs	-481.1	-0.10
Eurocontrol costs	-89.9	-0.02
Pension costs	-8,506.4	-1.75
Interest on loans	0.0	0.00
Changes in law	0.0	0.00
Total cost exempt from cost risk sharing	-9,537.3	-1.96

Focus on AUCU

En route AUCU monitoring at charging zone level

The actual en route unit cost incurred by airspace users (AUCU) in respect of activities performed in 2025 (37.68 €) is -5.5% lower than the nominal DUC (39.85 €). The difference between these two figures (-2.17 €/SU) is due to:

- the positive inflation adjustment resulting from higher than planned inflation (+0.20 €/SU);
- the impact of adjustments resulting from the costs exempted from cost sharing mechanism (-1.96 €/SU);
- the deduction of the traffic risk sharing adjustments (-0.28 €/SU); and,
- the deduction of the traffic adjustment (-0.12 €/SU) for the costs not subject to traffic risk sharing.

The share of the regulatory result (see next sub-section) in the AUCU (before the deduction of other revenues) is 6.4%.

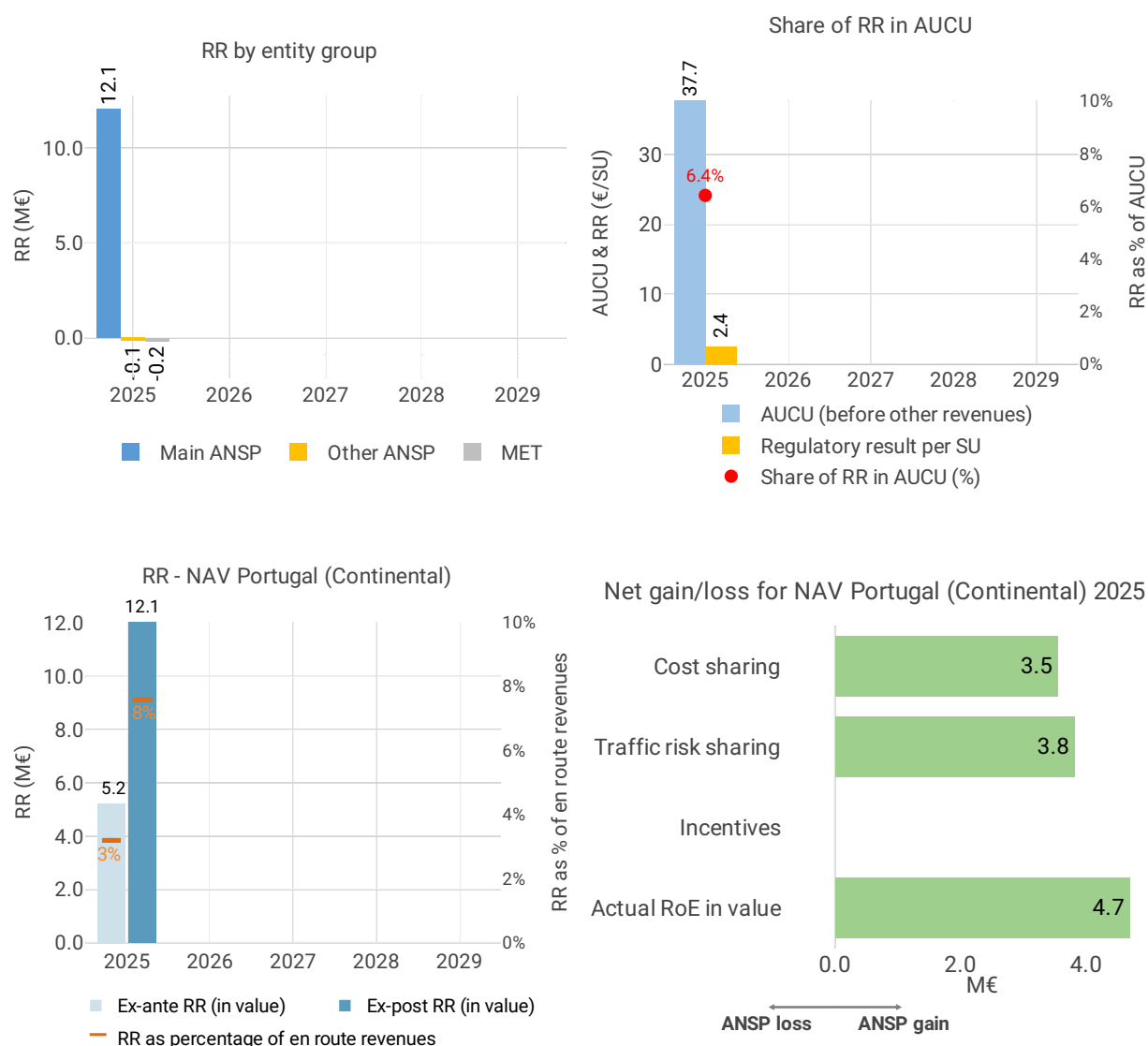
Initiatives implemented or planned that will improve this PI reported by the NSA

The NSA of Portugal provides the following information regarding the initiatives:

“The effective savings in 2025 – when comparing the actual unit cost that will be borne by airspace users with the determined unit cost – were €2.17 per service unit, an effect that will be reflected in the price to be paid in subsequent years. This results from multiple factors, mainly those related to costs exempt from cost sharing, as explained in spreadsheet 2.4.1.A.ERT.”



5.2.3 Regulatory result (RR)



Focus on regulatory result

NAV Portugal (Continental) net gain/loss on activity in the Portugal Continental en route charging zone in 2025

NAV Portugal reported a net gain of +7.4 M€, as a combination of a gain of +3.5 M€ arising from the cost sharing mechanism, with a gain of +3.8 M€ arising from the traffic risk sharing mechanism.

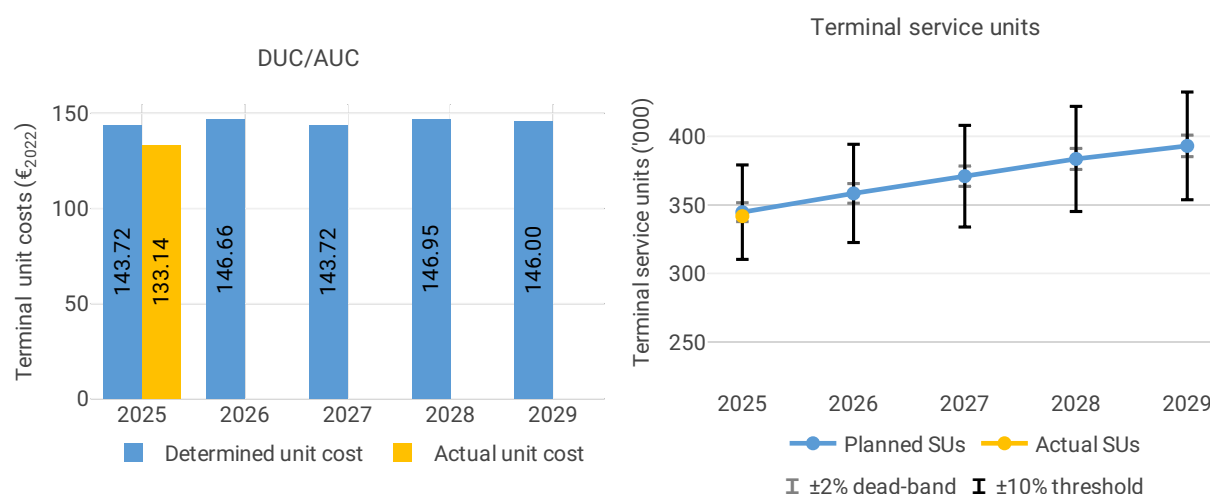
NAV Portugal (Continental) overall regulatory result (RR) for the en route activity

Ex-post, the overall RR, taking into account the net gain from the en route activity mentioned above (+7.4 M€) and the actual RoE (+4.7 M€), amounts to +12.1 M€ (7.6% of the en route revenues). The resulting ex-post rate of return on equity is 13.5%, which is higher than the 5.3% planned in the PP.



5.3 Terminal charging zone

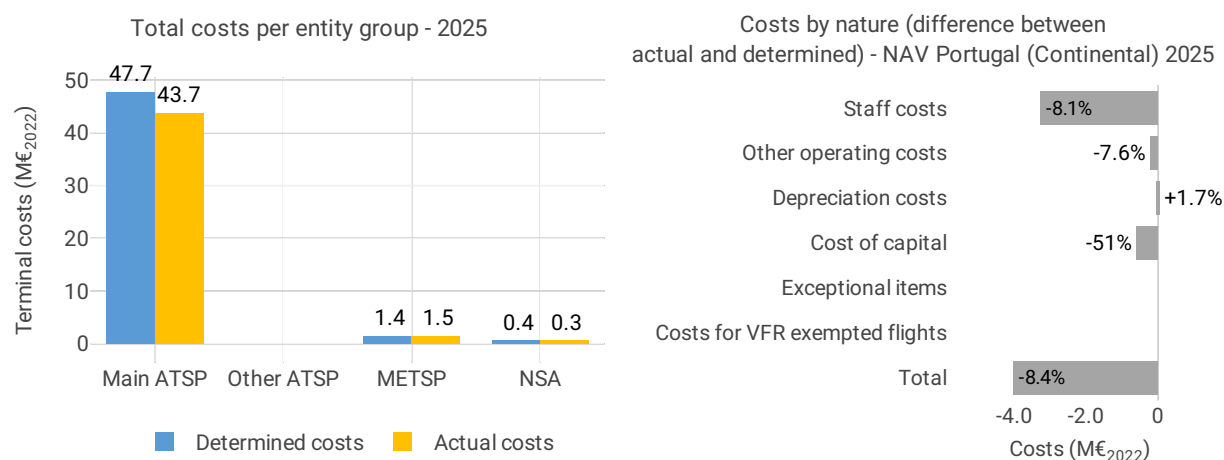
5.3.1 Unit cost (KPI#1)



Actual and determined data					
Total costs - nominal (M€)	2025	2026	2027	2028	2029
Determined costs	53.9	58.1	59.9	64.2	66.5
Actual costs	49.8	NA	NA	NA	NA
Difference costs	-4.1	NA	NA	NA	NA

Inflation assumptions	2025	2026	2027	2028	2029
Determined inflation rate	2.0%	2.0%	2.0%	2.0%	2.0%
Determined inflation index*	109.8	112.1	114.3	116.7	119.1
Actual inflation rate	2.2%	NA	NA	NA	NA
Actual inflation index*	110.5	NA	NA	NA	NA
Difference inflation index (p.p.)	+0.7	NA	NA	NA	NA

*100 = 2022



Focus on unit cost



AUC vs. DUC

In 2025, the terminal AUC was -7.4% (or -10.58 M€2022) lower than the planned DUC. This results from the combination of significantly lower than planned terminal costs in real terms (-8.1%, or -4.0 M€2022) and slightly lower than planned TNSUs (-0.8%).

Terminal service units

The difference between actual and planned TNSUs (-0.8%) falls inside the $\pm 2\%$ dead-band. Hence, the loss of terminal revenues is borne by the ANSPs.

Terminal costs by entity

Actual real terminal costs are -8.1% (-4.0 M€2022) lower than planned. This is the result of lower costs for the main ANSP, NAV Portugal (-8.4%, or -4.0 M€2022) and the NSA (-14.1%, or -0.1 M€2022) and higher costs for the MET service provider (+3.3%, or +0.1 M€2022).

Terminal costs for the main ANSP (NAV Portugal (Continental)) at charging zone level

Based on the additional information to the terminal reporting tables, the significantly lower than planned terminal costs in real terms for NAV Portugal in 2025 (-8.4%, or -4.0 M€2022) result from:

- Significantly lower than planned staff costs (-8.1%), mainly due to significantly lower-than-expected defined benefit pension costs, driven by favourable financial market conditions, while remuneration and other social charges remained in line with plan.
- Significantly lower than planned other operating costs (-7.6%), mainly due to lower electricity prices and reduced expenditure on rent and leasing, maintenance and repairs, and travel, partially offset by increased investment in IT and security.
- Slightly higher than planned depreciation (+1.7%), driven by the commissioning of investments implemented in recent years.
- Significantly lower than planned cost of capital (-51.0%) resulting from a much smaller-than expected asset base.

Assessment of the actual performance in the charging zone reported by the NSA

The NSA of Portugal provides the following overall assessment of the actual performance in 2025 at charging zone level:

“Total terminal costs, in real terms, were 8.1% lower than planned, which, combined with a negative deviation of 0.8% in service units, resulted in an actual unit cost 7.4% lower than projected.

This result was based on NAV Portugal, whose actual costs were 8.4% lower than the estimated costs, mainly due to the behavior of costs associated with defined benefit pension funds, where savings resulting from market factors – approximately 1.9 million euros – will be returned to airspace users in the next reference period.”



Explanation of the differences between actual and determined costs at charging zone level reported by the NSA

The NSA provides the following explanation for the differences between actual and determined costs in the charging zone:

"As justified above."

Recommendations formulated by the NSA to the ANSP (NAV Portugal (Continental)) to rectify the situation and actions taken by the ANSP

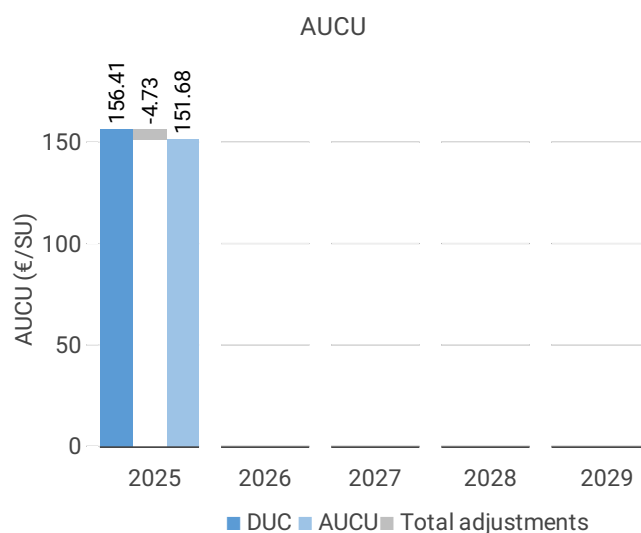
The NSA 2025 monitoring report indicates the following recommendations formulated by the NSA:

"There is no deviation to rectify."

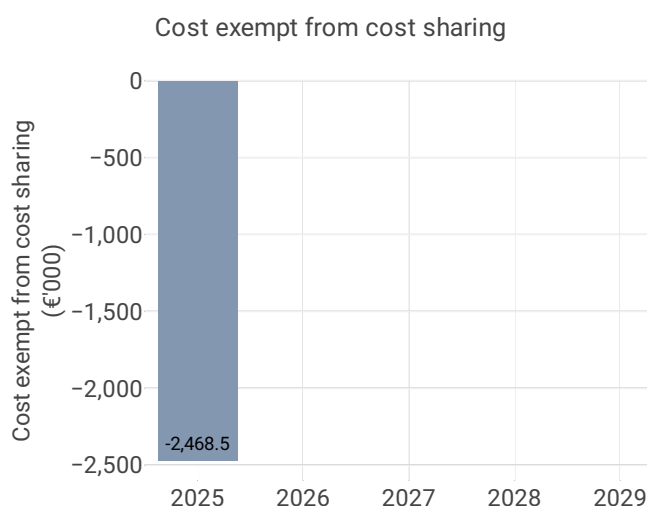
NAV Portugal reports the implementation of the following actions:

"The cost-efficiency targets for terminal have been met by the ANSP."

5.3.2 Actual unit cost incurred by the users (AUCU) (PI#1)



AUCU components (€/SU) – 2025	
Components of the AUCU in 2025	€/SU
DUC	156.41
Inflation adjustment	0.91
Cost exempt from cost sharing	-7.22
Traffic risk sharing adjustment	0.00
Traffic adjustment (costs not TRS)	0.06
Financial incentives	1.52
Modulation of charges	0.00
Cross-financing	0.00
Other revenues	0.00
Application of lower unit rate	0.00
Total adjustments	-4.73
AUCU	151.68
AUCU vs. DUC	-3.0%



Cost exempt from cost sharing – 2025		
Cost exempt from cost sharing by item - 2025	€'000	€/SU
New and existing investments	-537.9	-1.57
Competent authorities and qualified entities costs	-52.1	-0.15
Eurocontrol costs	0.0	0.00
Pension costs	-1,878.5	-5.50
Interest on loans	0.0	0.00
Changes in law	0.0	0.00
Total cost exempt from cost risk sharing	-2,468.5	-7.22

Focus on AUCU

Terminal AUCU monitoring at charging zone level

The actual terminal unit cost incurred by airspace users (AUCU) in respect of activities performed in 2025 (151.68 €) is -3.0% lower than the nominal DUC (156.41 €). The difference between these two figures (-4.73 €/SU) is due to:



- the positive inflation adjustment resulting from higher than planned inflation (+0.91 €/SU);
- the impact of adjustments resulting from the costs exempted from cost sharing mechanism (-7.22 €/SU);
- the addition of the traffic adjustment (+0.06 €/SU) for the costs not subject to traffic risk sharing; and,
- the impact of financial incentives (+1.52 €/SU).

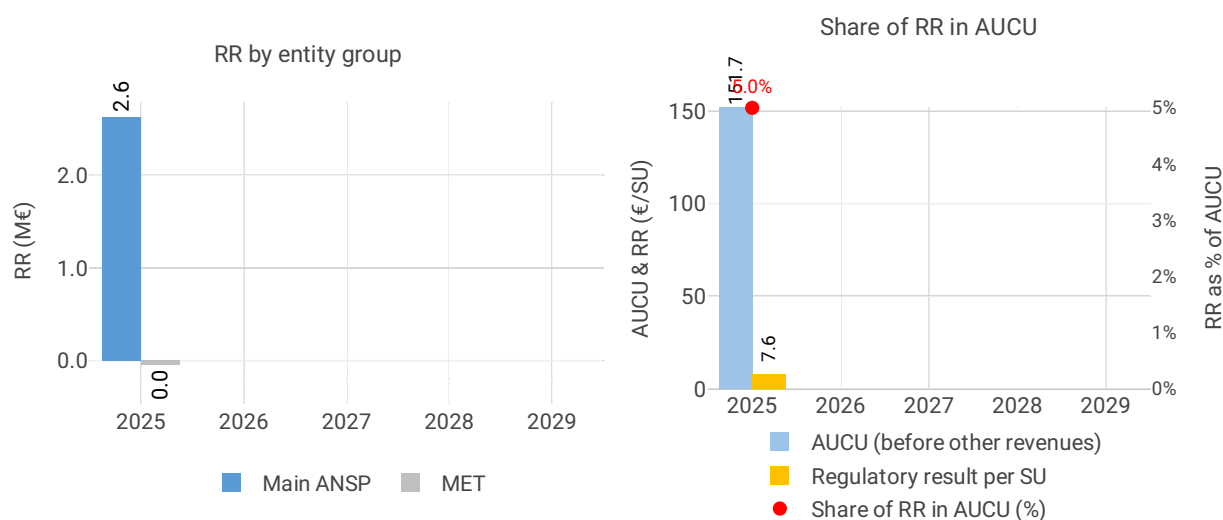
The share of the regulatory result (see next sub-section) in the AUCU (before the deduction of other revenues) is 5.0%.

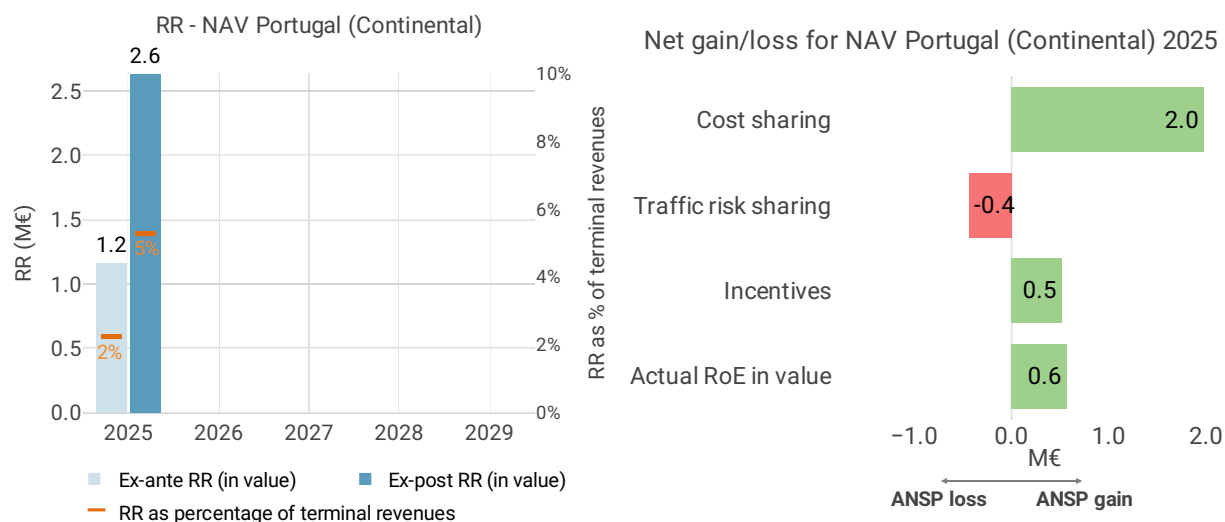
Initiatives implemented or planned that will improve this PI reported by the NSA

The NSA of Portugal provides the following information regarding the initiatives:

“The effective savings in 2025 – when comparing the actual unit cost that will be borne by airspace users with the determined unit cost – were €4.73 per service unit, an effect that will be reflected in the price to be paid in subsequent years. This results from various adjustments, some refunds and other recoveries, but the largest contribution comes from the reimbursement of costs exempt from cost sharing, as explained in spreadsheet 2.4.1.B.TERM.”

5.3.3 Regulatory result (RR)





Focus on regulatory result

NAV Portugal (Continental) net gain/loss on activity in the Portugal terminal charging zone in 2025

NAV Portugal reported a net gain of +2.1 M€, as a combination of a gain of +2.0 M€ arising from the cost sharing mechanism, with a loss of -0.4 M€ arising from the traffic risk sharing mechanism and a gain of +0.5 M€ relating to financial incentives.

NAV Portugal (Continental) overall regulatory result (RR) for the terminal activity

Ex-post, the overall RR, taking into account the net gain from the terminal activity mentioned above (+2.1 M€) and the actual RoE (+0.6 M€), amounts to +2.6 M€ (5.3% of the terminal revenues). The resulting ex-post rate of return on equity is 24.4%, which is much higher than the 5.3% planned in the PP.

