

# **Performance Review Board**

## **Monitoring Report**

### **Spain - 2025**



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## 1 OVERVIEW

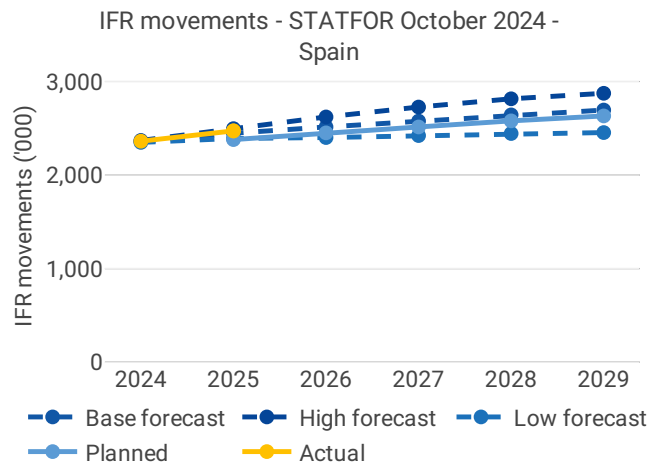
### 1.1 Contextual information

*This document is based on the version of the Annual Monitoring Report file submitted by the state on 2026-08-28 (ES12081\_Spain\_prefilled AMR 2025.v4.xlsx) and the accompanying submission of en route and terminal (if applicable) reporting tables.*

*National performance plan adopted following Commission Decision (EU) 2025/1063 of 19 May 2025*

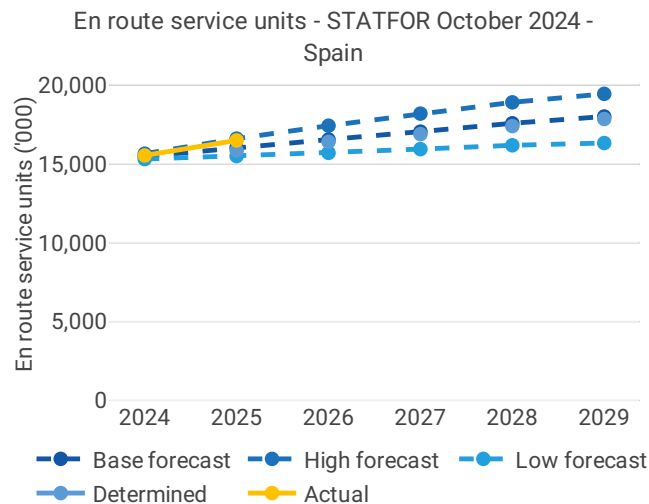
|                                                             |                                                       |                      |
|-------------------------------------------------------------|-------------------------------------------------------|----------------------|
| <b>List of ACCs</b> 5                                       | <b>Exchange rate (1 EUR=)</b>                         | <b>Main ANSP</b>     |
| Barcelona ACC                                               | 2022: 1 EUR                                           | • ENAIRE             |
| Madrid ACC                                                  | 2025: 1 EUR                                           |                      |
| Palma ACC                                                   |                                                       | <b>Other ANSPs</b>   |
| Sevilla ACC                                                 | <b>Share of Union-wide:</b>                           | • Skyway             |
| Canarias ACC                                                | • <b>traffic (TSUs) 2025</b> 11.9%                    | • ANSP EA            |
|                                                             | • <b>en route costs 2025</b> 11.5%                    |                      |
| <b>No of airports in the scope of the performance plan:</b> | <b>Share en route / terminal costs 2025</b> 89% / 11% | <b>MET Providers</b> |
| • ≥80'K 6                                                   | <b>En route charging zone(s)</b>                      | • AEMET              |
| • <80'K 1                                                   | Spain Continental                                     |                      |
|                                                             | Spain Canarias                                        |                      |
|                                                             | <b>Terminal charging zone(s)</b>                      |                      |
|                                                             | Spain                                                 |                      |

### 1.2 Traffic (En route traffic zone)



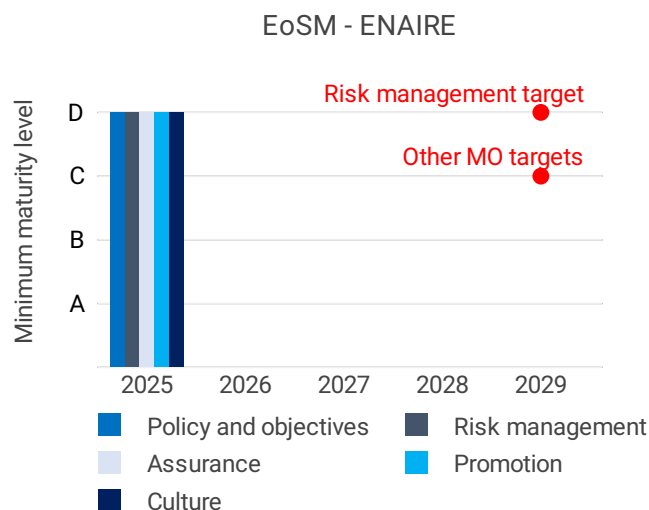
- Spain recorded 2,472K actual IFR movements in 2025, +4.7% compared to 2024 (2,362K).
- Actual 2025 IFR movements were +3.9% above the plan (2,379K).
- Actual 2025 IFR movements were +14.9% above the actual 2019 level (2,152K).





- Spain recorded 16,479K actual service units in 2025, +6.1% compared to 2024 (15,527K).
- Actual 2025 service units were +4.1% above the plan (15,835K).
- Actual 2025 service units are +22.6% above the actual 2019 level (13,439K).

### 1.3 Safety (Main ANSP)

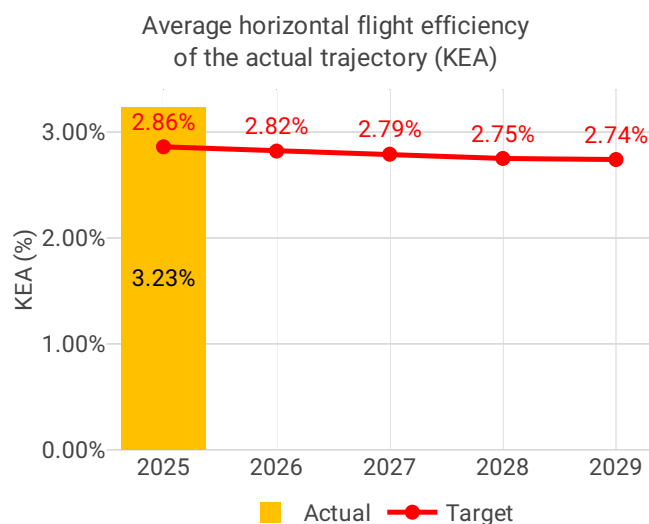


- In 2025, ENAIRE achieved the planned maturity levels set out in its performance plan for all five components of the EoS. In more detail, ENAIRE exceeded the planned levels in all areas, reaching the highest level D in all components.
- In 2025, EA met the planned maturity levels set out in its performance plan for all five components of the EoS. In more detail, EA exceeded the planned level in the area of Safety Risk Management, reaching level D together with Safety Culture component.
- In 2025, Skyway met the planned maturity levels set out in its performance plan for four out of five components of the EoS. In more detail, the area where Skyway missed the planned level was Safety Policy and Objectives.
- The rate of runway incursions (RI) was 2.14 at airport level, lower than the Union-wide average, and lower than the rate of RIs in 2024. The rate of RIs with ANS contribution was 0.50, lower than the Union-wide average, and lower than the rate of RIs with ANS contribution in 2024.



- The rate of separation minima infringements (SMIs) at State level was 4.26, and at ANSP level 6.67. Rate of SMIs at State level was below the Union-wide average, whereas at ANSP level the rate was above the Union-wide average. When comparing to 2024, rate of SMIs has decreased at both State level and at ANSP level.

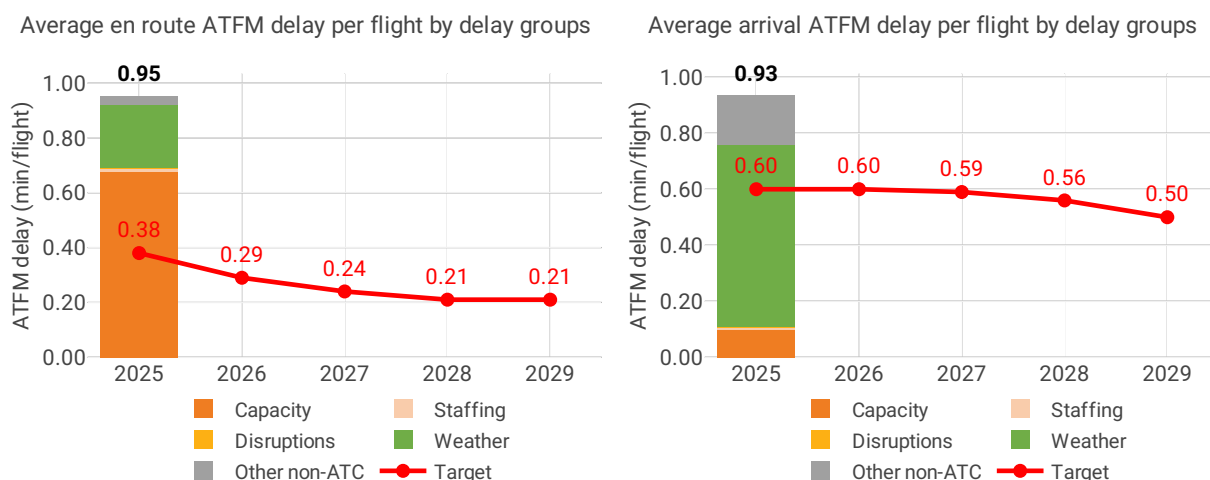
#### 1.4 Environment (Member State)



- Spain registered a KEA performance of 3.23%. Their target of 2.86% was not achieved and Spain did not contribute positively to Union-wide performance. The NSA states that KEA improved monthly in 2025 despite strong traffic growth, with growing adverse weather conditions frequently requiring deviations from the planned route. The PRB notes, however, that the actual trajectories are not longer than the planned ones.
- Both KEP and KES remained stable in comparison with 2024 with a minor improvement in both indicators.
- VFE of the actual en route trajectory was at 74.6%, which was worse than the average Union-wide performance.
- The average time in level flight during descent improved marginally and during climb deteriorated compared to 2024.
- Additional taxi-out time was 3.56 min/flight and additional taxi-in time was 1.50 min/flight which both remained stable compared to 2024.
- Additional time in the arrival sequencing and metering area remained stable at 3.06 min/flight, with a minor improvement compared to 2024.



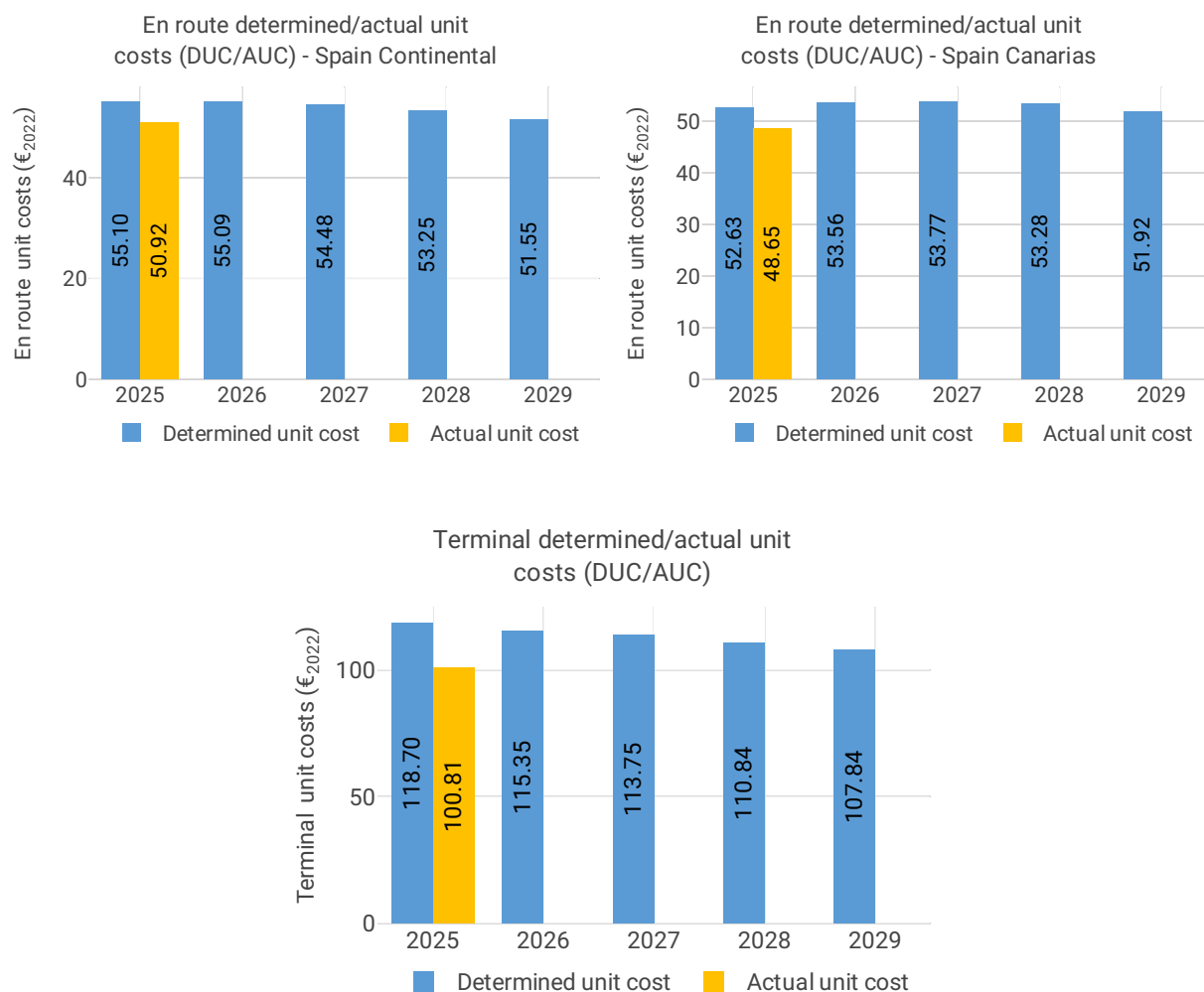
## 1.5 Capacity (Member State)



- Spain registered 0.99 minutes of average en route ATFM delay per flight during 2025, which has been adjusted to 0.95 during the post-ops adjustment process, thus not achieving the local target value of 0.38. Delays in Spain decreased by -0.05 minutes per flight year-on-year.
- Delays were highest in July and August, mostly driven by ATC capacity and weather.
- The share of delayed flights with delays longer than 15 minutes in Spain decreased by -3 percentage points compared to 2024 and was lower than 2019 values.
- The actual number of ATCOs in OPS in Spain was 1,306 FTEs, -1.7% or -23 FTEs below the planned level. The actual number of ATCOs in OPS was below the planned number for all five ACCs: 181 FTEs in Canarias ACC, -1 FTE below the plan; 373 FTEs in Barcelona ACC, -8 FTEs below the plan; 449 FTEs in Madrid ACC, -8 FTEs below the plan; 141 in Palma ACC, -2 FTEs below the plan; and 162 in Sevilla ACC, -5 FTE below the plan.
- All Spanish ACCs recorded a number of sector opening hours in 2025 above the level recorded in 2024. In Barcelona ACC sector opening hours were 113,168, showing a year-on-year increase of 5%, while in Canarias ACC the value increased by 2% to 56,485 sector hours. For Madrid (105,322), Palma (36,778) and Sevilla (47,953) ACCs the number of sector opening hours increased respectively by +9%, +3% and +10% compared to 2024.
- Barcelona ACC registered 9.87 IFR movements per sector opening hour in 2025, 1% above the 2024 level; Canarias ACC registered 7.67 IFR movements per sector opening hour, 3% above the 2024 level; Madrid ACC registered 12.63 IFR movements per sector opening hour, -4% below the 2024 level; Palma ACC registered 10.23 IFR movements per sector opening hour, -1% below 2024 levels; and Sevilla ACC registered 11.86 IFR movements per sector opening hour, -3% below the 2024.
- Spain registered an average airport arrival ATFM delay of 0.93 minutes per flight in 2025, thus not achieving the local target of 0.6 minutes. Compared to 2024, average arrival ATFM delays in Spain were -0.16 minutes per flight lower in 2025.
- The main drivers of delays were weather, accounting for 0.65 of total delays, and other non-ATC causes, responsible for 0.18.



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



- The en route 2025 actual unit cost of Spain Continental was 50.92€<sub>2022</sub>, -7.6% lower than the determined unit cost (55.10€<sub>2022</sub>). The en route 2025 actual unit cost of Spain Canarias was 48.65€<sub>2022</sub>, -7.6% lower than the determined unit cost (52.63€<sub>2022</sub>). The terminal 2025 actual unit cost of Spain was 100.81€<sub>2022</sub>, -15.1% lower than the determined unit cost (118.70€<sub>2022</sub>).
- The en route 2025 actual service units of Spain Continental (14.2M) were +3.9% higher than the determined service units (13.6M). The en route 2025 actual service units of Spain Canarias (2.3M) were +5.1% higher than the determined service units (2.2M).
- The en route 2025 actual total costs of Spain Continental were -29.8M€<sub>2022</sub> (-4.0%) lower than determined with all cost categories registering lower-than-planned costs, except cost of capital. This is mainly due to lower staff costs (-22.5M€<sub>2022</sub>, or -5.1%) and lower other operating costs (-6.2M€<sub>2022</sub>, or -10.7%) for ENAIRE. According to the NSA, the decrease in staff costs is mainly due to significantly lower-than-planned expenses in “other staff related benefits”. The decrease in other operating costs reflects a more efficient use of resources, resulting in lower spending on services, communications, insurance and energy.
- The en route 2025 actual total costs of Spain Canarias were -3.3M€<sub>2022</sub> (-2.8%) lower than determined with all cost categories registering lower-than-planned costs. This is



mainly due to lower staff costs for ENAIRE (-1.6M€2022, or -2.5%) and lower depreciation for EA (-1.1M€2022, or -41.8%). The NSA explained that the decrease in staff costs of ENAIRE is mainly due to significantly lower-than-planned expenses in “other staff related benefits”. The decrease in depreciation costs of EA is mainly due to lower investments than planned.

- ENAIRE spent 169.4M€2022 in 2025 related to costs of investments for both en route and terminal charging zones, in line with the determined (169.3M€2022).
- The en route Spain Continental actual unit cost incurred by users in 2025 was 54.76€ (-6.4% below the 2025 DUC), while the en route Spain Canarias actual unit cost incurred by users in 2025 was 45.74€ (-18.3% below the 2025 DUC). The terminal actual unit cost incurred by users in 2025 was 15.77€ (-87.7% below the 2025 DUC). The difference between the AUCU and the DUC for Spain Continental and for the terminal charging zone is mainly driven by other revenues. The difference between the AUCU and the DUC for Spain Canarias is mainly driven by cross-financing.

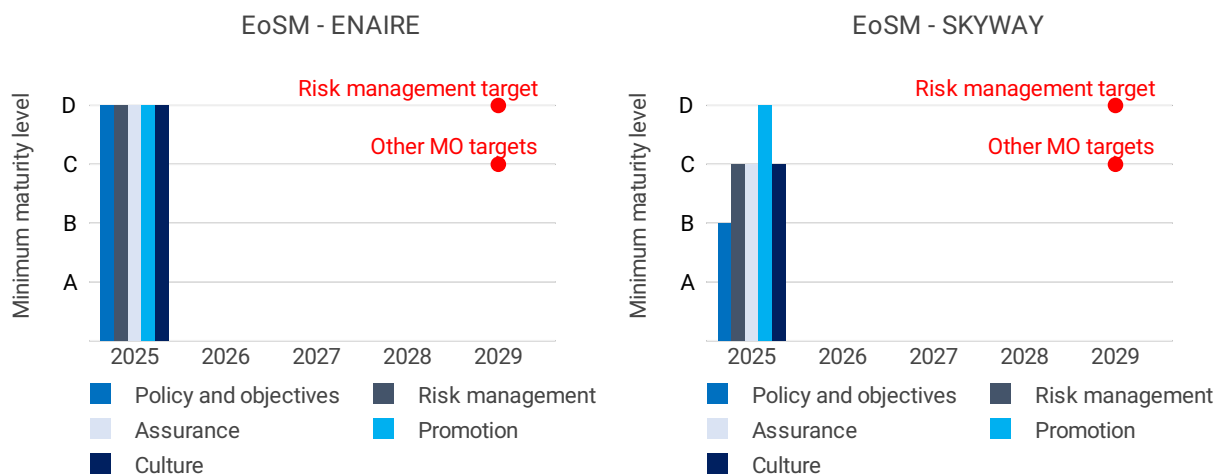


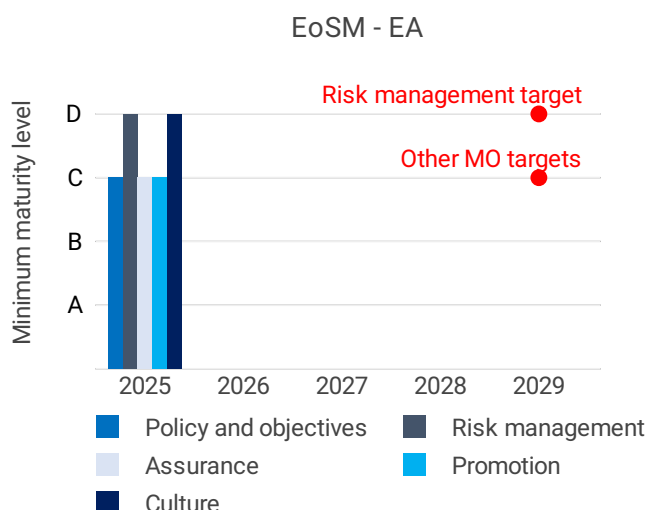
## 2 SAFETY - SPAIN

### 2.1 PRB monitoring

- In 2025, ENAIRE achieved the planned maturity levels set out in its performance plan for all five components of the EoSM. In more detail, ENAIRE exceeded the planned levels in all areas, reaching the highest level D in all components.
- In 2025, EA met the planned maturity levels set out in its performance plan for all five components of the EoSM. In more detail, EA exceeded the planned level in the area of Safety Risk Management, reaching level D together with Safety Culture component.
- In 2025, Skyway met the planned maturity levels set out in its performance plan for four out of five components of the EoSM. In more detail, the area where Skyway missed the planned level was Safety Policy and Objectives.
- The rate of runway incursions (RI) was 2.14 at airport level, lower than the Union-wide average, and lower than the rate of RIs in 2024. The rate of RIs with ANS contribution was 0.50, lower than the Union-wide average, and lower than the rate of RIs with ANS contribution in 2024.
- The rate of separation minima infringements (SMIs) at State level was 4.26, and at ANSP level 6.67. Rate of SMIs at State level was below the Union-wide average, whereas at ANSP level the rate was above the Union-wide average. When comparing to 2024, rate of SMIs has decreased at both State level and at ANSP level.

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





## Focus on EoSM

### ENAIRE

In 2025, ENAIRE achieved the planned maturity levels set out in its performance plan for all five components of the EoSM. In more detail, ENAIRE exceeded the planned levels in all areas, reaching the highest level D in all components.

In terms of main measures put in place to achieve the safety performance targets, the report defines the following elements:

- Well-established SMS processes and continuously improving since 2009.
- The systematic integration of human factors across all safety areas.
- The development of increasingly powerful and robust dashboards to support more effective safety monitoring facilitating informed decision-making.
- Consistent and proactive involvement in international working groups focused on safety improvement.
- Commitment to benchmarking and the exchange of best practices.

### EA

In 2025, EA met the planned maturity levels set out in its performance plan for all five components of the EoSM. In more detail, EA exceeded the planned level in the area of Safety Risk Management, reaching level D together alongside Safety Culture component.

According to the monitoring report, some differences should be noted in the fields (c) and (d) due to the military condition of the EA and the comprehensive approach to safety of the EA that under Flight Safety includes all the Operational Safety aspects of all the activities done by the EA, some of them not easily releasable to the public.

### Skyway

Skyway met the planned maturity levels set out in its performance plan for four out of five components of the EoSM. In more detail, the area where Skyway missed the planned level was Safety Policy and Objectives.

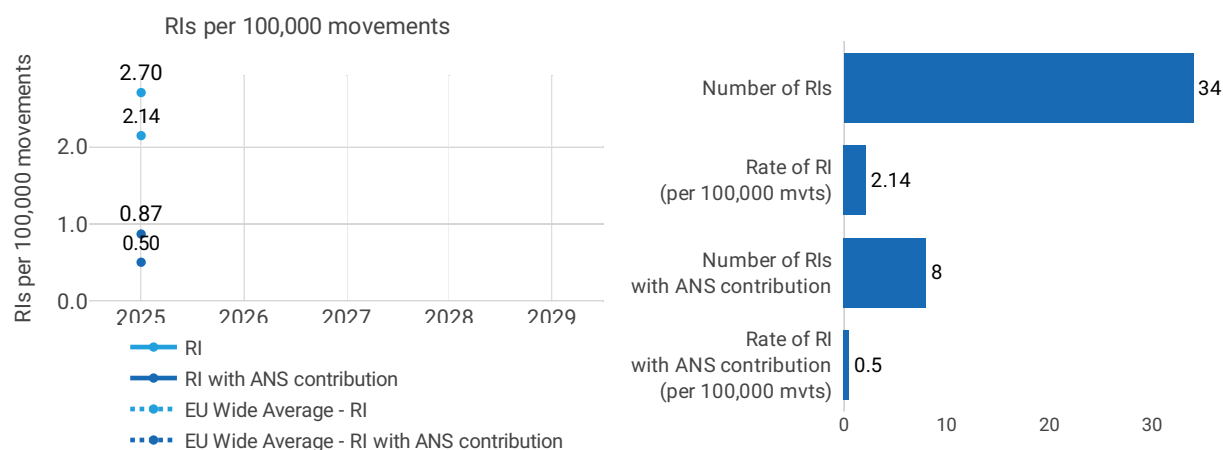


In terms of main measures put in place to achieve the planned levels, the report lists Definition of Skyway's Safety Culture. Just Culture fora for debate among employees and management. Human Factors training itinerary.

For the maturity levels where Skyway did not reach the planned level, the monitoring report lists the following circumstances that lead to this situation: Actual values for the new questions 3.1 and 5.1 are lower than expected due to the inclusion of specific Human Factors capability requirements. The coordination carried out by AESA (Civil Spanish NSA) with EASA to ensure future compliance is particularly noteworthy. The current gap is mainly related to the formal recognition of the EUROCONTROL Practitioner LZ – Human Factors Practitioner Programme [HUM-PRG-PP] qualification within the EoSM framework. Following coordination with EASA, it has been clarified that this qualification may be considered acceptable in place of the HF Specialist/Expert accreditation required under the EoSM, provided that the staff member has fully completed the programme and has officially obtained the certification, rather than being only in the process of training. Until the certification is formally achieved by the relevant personnel, the organisation cannot demonstrate Level C compliance for questions 3.1 and Level D for 5.1. Nevertheless, the transition period foreseen within RP4 and the ongoing coordination with EASA provide a clear path towards full compliance in the coming years.

## 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 - Spain |                   |               |              |                     |                                    |                                           |
|---------------------------------------------------|-------------------|---------------|--------------|---------------------|------------------------------------|-------------------------------------------|
| #                                                 | 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                                                 | Madrid Barajas    | 430,785       | 12           | 2.79                | 1                                  | 0.23                                      |
| 2                                                 | Barcelona         | 360,873       | 4            | 1.11                | 4                                  | 1.11                                      |
| 3                                                 | Palma de Mallorca | 246,755       | 5            | 2.03                | 1                                  | 0.41                                      |
| 4                                                 | Malaga            | 188,919       | 4            | 2.12                | 0                                  | 0.00                                      |
| 5                                                 | Gran Canaria      | 147,075       | 8            | 5.44                | 2                                  | 1.36                                      |
| 6                                                 | Alicante          | 126,081       | 0            | 0.00                | 0                                  | 0.00                                      |
| 7                                                 | Ibiza             | 85,086        | 1            | 1.18                | 0                                  | 0.00                                      |



## Focus on runway incursions

In 2025, Spain reported 8 runway incursions (RI) at all the airports listed in the performance plan (7). When comparing the RIs at airport level to Union-wide level, Spain was lower than Union-wide average (0.50 vs 2.70). The rate of runway incursions has decreased significantly compared to 2024 at airport level (0.50 vs 11.91).

In 2025, Spain reported 8 runway incursions with ANS contribution. When comparing the rate of RIs at airport level with ANS contribution, Spain was lower than Union-wide average (0.50 vs 0.87). The rate of RIs with ANS contribution has decreased compared to 2024 (0.50 vs 1.43).

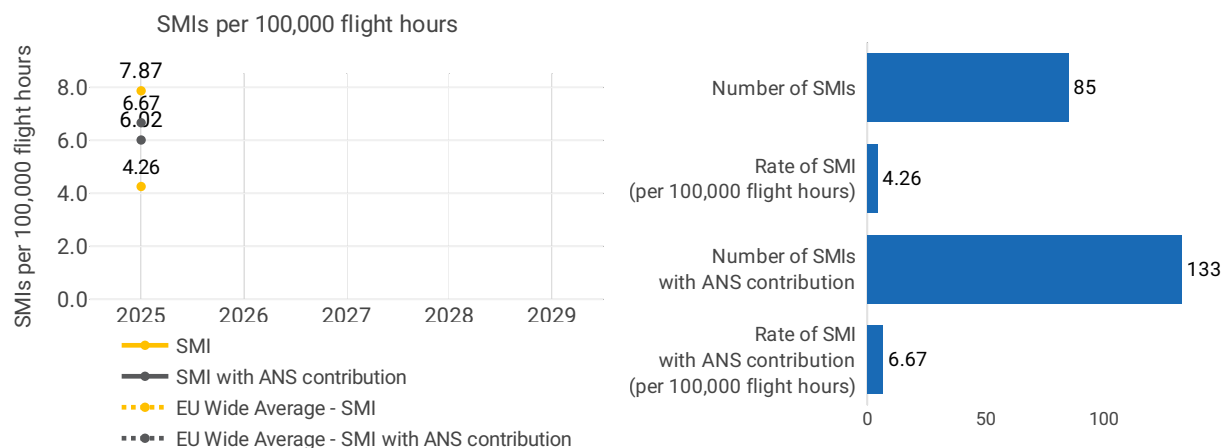
In terms of the initiatives implemented or planned to improve this performance indicator, the report defines the following elements for ENAIRE: An A-SMGCS level 2 System has been reactivated in LEPA in early 2026 (out of service due to technical issues throughout 2025). In addition, a runway incursion alerts system has also been implemented in LEMG in early 2026. The implementation of a system for Non-Conformity Alerts and Conflicting Authorisations (CMAC / CATC) is planned for 2026. On the other hand, the effectiveness of the implementation of measures in the different action plans activated in previous years is monitored, especially a specific Action Plan at the Barcelona-El Prat Tower (February 2025).

For SKYWAY, the monitoring report defines as follows: Skyway included in the 2025 Safety Plans of every unit the analysis and implementation of the new GAPPRI recommendations published in August 2024, when applicable.

In terms of monitoring the effectiveness of the initiatives, the NSA states in the monitoring report that the monitoring of the proposed measures is structured at three levels. Firstly, through the application within AESA of the Risk-Based Oversight (RBO) methodology, where the evolution of the indicators is monitored. Moreover, several key safety areas are identified at a State Level (through the State Safety Program) to categorize occurrences. These key safety areas include, for the ATM/ANS scope runway incursions. In the case of Runway Incursions, these are defined as occurrences where an aircraft, vehicle or person is improperly within the protected areas designated for landing and take-off of aircraft. Secondly, the monitoring continues through the follow-up of the effective implementation of measures via ATM/ANS audits (related functional changes, specific action plans). Finally, regular meetings are held with the ANSP Accountable Manager and the Safety Manager, during which updates are provided on the evolution of the indicators, as well as on the underlying causes and the measures implemented.



### 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                                                          | ENAIRES | 1,941,651    | NA   | NA   | NA   | NA   | 133                                  | NA   | NA   | NA   | NA   |
| 2                                                          | SKYWAY  | 52,792       | NA   | NA   | NA   | NA   | 0                                    | NA   | NA   | NA   | NA   |
| 3                                                          | EA      | NA           | NA   | NA   | NA   | NA   | NA                                   | 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 | ENAIRES | 7                                                          | NA   | NA   | NA   | NA   |                             |      |      |      |      |
| 2 | SKYWAY  | 0                                                          | NA   | NA   | NA   | NA   |                             |      |      |      |      |
| 3 | EA      | NA                                                         | NA   | NA   | NA   | NA   |                             |      |      |      |      |

#### Focus on separation minima

At State level, Spain reported 85 separation minima infringements (SMI) in their airspace during 2025. The rate of separation minima infringements was lower than Union-wide average (4.26 vs 7.87). At ANSP level, Spain reported 133 SMIs with ANS contribution. The rate of separation minima infringements at ANSP level was higher than the Union-wide average (6.67 vs 6.02).

When comparing to 2024, the rate of separation minima infringements has decreased significantly at State level (4.26 vs 29.13) and decreased at ANSP level (6.67 vs 8.57).

In terms of the initiatives implemented or planned to improve this performance indicator, at State level, Spain describes that the monitoring of the proposed measures is structured at three levels. Firstly, through the application within AESA of the Risk-Based Oversight (RBO) methodology, where the evolution of the indicators is monitored. Moreover, several key safety areas are identified at a State Level (through the State Safety Program) to categorize occurrences. These key safety areas include, for the ATM/ANS scope, loss of separation in flight. In the case of loss of separation in flight, this key safety area includes occurrences where:

- The separation minima between two aircraft are breached.



- In which two aircraft fail to maintain the separation prescribed for the current airspace and flight rules.
- And where there is an inadequate separation, meaning situations in which the separation, perceived by either the pilots or the ATS personnel, is compromised even where no minima was prescribed (for example, between aircraft in uncontrolled airspace, or between VFR and IFR aircraft in class E airspace).

Secondly, the monitoring continues through the follow-up of the effective implementation of measures via ATM/ANS audits (related functional changes, specific action plans). Finally, regular meetings are held with the ANSP Accountable Manager and the Safety Manager, during which updates are provided on the evolution of the indicators, as well as on the underlying causes and the measures implemented.

In terms of the initiatives implemented or planned to improve this performance indicator, at ANSP level, the monitoring report defines the following elements: For ENAIRE, a TTM (Tactical Trajectory Module) tool with medium-term conflict warnings and a “what-else” function, for blind spot event prevention, has been implemented in 2025, in LECM and ECB Enroute sectors, and its implementation at LECS and GCCC is planned for the near future. Also, a STCA (Short Term Conflict Alert) alert system has been implemented in 2025 at GCXO Approach. Airspace restructuring has also been carried out at LECP in 2025. Improvements in civil-military coordination in the Torrejón area (LEMD-LETO) are also planned for 2026.

On the other hand, the effectiveness of the implementation of measures in the different action plans activated in previous years is monitored, especially a specific Action Plan in LECM-Enroute (May 2024), and an Action Plan for speed adherence in the final approach to LEPA (July 2023).

The monitoring report also notes that the reported data is provided RAT ground severity associated to the SMI, as obtained by the application of the RAT methodology by the ANSP.

Furthermore, the number of SMIs reported by ENAIRE is 133, corresponding to the total number of safety incidents classified as minimum separation infringements recorded in ENAIRE'S database, which have been assigned a ground severity of A, B or C after applying the RAT, as indicated in the guidance material referenced in the PRB template itself.

For EA, the monitoring report states that this PI is new for the EA and doesn't reflect exactly the statistics EA is keeping. EA states it will need more time to accommodate their data to this new indicator.



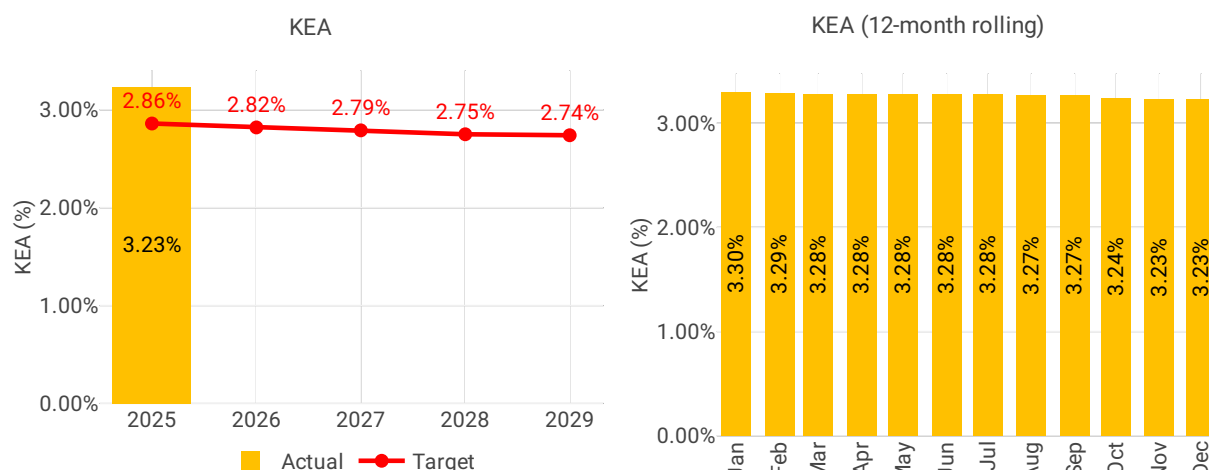
### 3 ENVIRONMENT - SPAIN

#### 3.1 PRB monitoring

- Spain registered a KEA performance of 3.23%. Their target of 2.86% was not achieved and Spain did not contribute positively to Union-wide performance. The NSA states that KEA improved monthly in 2025 despite strong traffic growth, with growing adverse weather conditions frequently requiring deviations from the planned route. The PRB notes, however, that the actual trajectories are not longer than the planned ones.
- Both KEP and KES remained stable in comparison with 2024 with a minor improvement in both indicators.
- VFE of the actual en route trajectory was at 74.6%, which was worse than the average Union-wide performance.
- The average time in level flight during descent improved marginally and during climb deteriorated compared to 2024.
- Additional taxi-out time was 3.56 min/flight and additional taxi-in time was 1.50 min/flight which both remained stable compared to 2024.
- Additional time in the arrival sequencing and metering area remained stable at 3.06 min/flight, with a minor improvement compared to 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

The values of KEA and the KEA corrected for the influence of the war in Ukraine have both improved with respect to 2024. KEA went from 3.30% to 3.23%, while the corrected KEA went from 3.28% to 3.20%.

Spain has a high value in terms of the average internal additional distance per flight (6.71 km, the second highest) and the average additional distance (15.32 km, the third highest).

As a result, Spain is the second highest in terms of contribution to the total additional distance in the SES area with 14.06%.

Regarding the assessment of the achieved level of actual performance in the environment KPA, the NSA reports: *“Throughout 2025, the KEA value showed a month-by-month improvement, from 3,30% in January to 3,23% in December, despite a 4,7% increase in traffic.*

*More than 2,47 million flights were managed in 2025, representing a 4,7% increase compared to 2024. Additionally, growing adverse weather conditions frequently require deviations from the planned route; July, August, September and October accumulate almost 65% of the delay generated by weather during 2025.”*



Regarding the implementation of major operational or structural changes during the calendar year impacting performance in this key performance area, the NSA reports: *“As a result of the monitoring tasks carried out by AESA it was informed the following to the Commission:*

*Measures such as the continuous deployment of new connectivities and direct routes. Airspace optimization through the progressive deployment of Free Route Airspace (FRA) across all FIRs will allow aircraft to fly more direct routes, as well as on gaining more airspace flexibility by implementing flexible sectors configurations with the project “Bricks”. Enhanced ATFM coordination between Network Manager (NM) and ANSPs will help mitigate congestion by improving tactical flow management and optimizing sector capacities dynamically. The reinforcement of the controller staffing levels that is being developed by ENAIRE will continue and will help address operational bottlenecks, reducing the need for ATFM measures that often penalize the route efficiency. Flexible use of airspace (FUA) will be prioritized to maximize available capacity while minimizing constraints imposed by restricted and military areas, increasing availability times for flight planning, freeing up cruising levels for overflights and modifying the geometry of some of these areas. Both ENAIRE and the Military are working in SESAR project. New DCTs have been implemented and new agreements have been reached between Enaire and the military authorities regarding certain military areas applicable during the summer of 2025. Some of these agreements have been maintained over time (including new FUA-R areas adjustments to area reservations in line with actual use, among others).*

*Implementing these measures collectively will contribute to a more efficient, resilient, and performance driven airspace network, enabling a more probable compliance with KEA targets while accommodating the very high growing traffic demand still expected for the coming years.*

*Following coordination with ENAIRE, additional information is provided below:*

- Regarding FRA-Cross border Free Route Airspace it is noted that following coordination with the SDM and ENAIRE at the meeting held on 21 October to follow up on CP1 projects, it was concluded that the project is likely to be completed in 2027. In 2025, work was carried out on the TTM implementation, and two phases were defined.*
- Additional actions developed under the FUA consideration include: ensuring availability of frequently used ad-hoc areas in CACD (to maximize route availability), elaboration of Dynamic Management Mil Areas Procedure, implementation of a new set of FUA Indicators, LARA V5 update and a global increase of the availability of Air Space structures for the CAG.*
- Throughout 2025, work has continued on the implementation of PBN procedures.”*

Regarding progress on the implementation of the measures committed to in the ERNIP, the NSA reports: *“The 2025 plans included in the ERNIP that may have an impact on KEA are specified below*

- *FUA measures – Civil Military coordination*
- *ESPORTFRA: Work is on-going during 2025 to continue improve the Free Route estructure within Spain and Portugal. Working is on-going for crossborder initiatives. ESPORTFRA Phase 1 will be published 14 May 2026.”*



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: *“Although the target was not met, the trend in the indicator is considered positive because the decline has been steady throughout the year, despite a 4.7% increase in traffic compared with 2024. The high demand has led to congestion in key airspace sectors, requiring the implementation of ATFM measures and route deviations, leading to suboptimal trajectories and operational inefficiencies which have negatively impacted en-route efficiency. The high increase of severe adverse weather conditions in Spain, especially in the Mediterranean area, such as convective phenomena, thunderstorms, turbulence, and strong winds, frequently require deviations from the planned route, leading to increased route extensions. Staffing limitations have required the implementation of ATFM measures which have also contributed to not to reach optimal operational en-route efficiency. The fact that FRA implementation is going on with some delays (from 2025 to 2027) have had the effect to eat up the beneficial effects of other measures put in place. The growing military activity due to the geopolitical situation limit the ability to optimize flight paths. Airlines' cost optimization strategies prioritize lower route charges over minimum distance, penalizing the KEA indicator.*

*The non-compliance of KEA was anticipated before the end of the year and was informed to the Commission according to Regulation (EU) 2019/317 Article 37 (1), concluding that despite the improvement in the indicator and that the projects were generally being implemented on time, the delay in the implementation of FRA and the other issues highlighted have contributed to the failure to meet the target.”*

Regarding recommendations to the ANSP to rectify the situation, the NSA reports: *“AESA, ENAIRE, Ministry of Transport and the Spanish Air Force are all working and collaborating very closely to address the structural airspace problems that contribute to the route inefficiency. The measures to be implemented to achieve the targets are those considered in ESPP4. The environmental plan within the ESPP4 has being implemented mostly as it was defined except FRA, one of the most relevant project.*

*When FRA project is fully implemented, aircrafts will be allowed to fly more direct routes, reducing unnecessary deviations. Enhanced ATFM coordination between Network Manager (NM) and ANSPs will help mitigating congestion. Sector reconfiguration and flexible use of airspace (FUA) will maximize available capacity. Reinforcing controller staffing levels and optimizing sector workload distribution will contribute improving operational bottlenecks reducing the need for excessive route extension.*

*Encourage ENAIRE to continue working on actions planned in the ESPP4 Performance Plan, particularly FRA project which has been postponed from 2025 to 2027.”*

Regarding remedial measures that have been / will be taken by the ANSP to rectify the situation, the NSA reports: *“To improve KEA performance and enhance en-route flight efficiency, a series of strategic and operational measures will be considered:*

- Firstly, in the short term, the continuous deployment of new connectivities and direct routes, reducing unnecessary deviations and non-direct routes.*

*ENAIRE also will continue working on the airspace optimization through the progressive deployment of Free Route Airspace (FRA) across all FIRs will allow aircraft to fly more direct routes, as well as on gaining more airspace flexibility by implementing flexible sectors configurations with the project “Bricks”.*



- Secondly, enhanced ATFM coordination between Network Manager (NM) and ANSPs will help mitigate congestion by improving tactical flow management and optimizing sector capacities dynamically, not only in bad weather situations but in demand – capacity imbalance situations with the application of a specific procedure in the framework of the Cross Border Weather and Capacity Procedure.

- The reinforcement of the controller staffing levels that is being developed by ENAIRE will continue in 2026 and will help address operational bottlenecks, reducing the need for ATFM measures that often penalize the route efficiency.

- Additionally, flexible use of airspace (FUA) will be prioritized to maximize available capacity while minimizing constraints imposed by restricted and military areas, increasing availability times for flight planning, freeing up cruising levels for overflights and modifying the geometry of some of these areas. Both ENAIRE and the Military are working in SESAR project regarding the development and implementation of DMA type 3 as well as in the implementation of the SESAR 115 Solution for the accommodation of RPAS in controlled airspace, and are developing a Procedure for the dynamic management of Areas.”

Regarding the follow up of the remedial measures indicated in the previous monitoring report(s), the NSA reports: “AESA continues its monitoring activities in RP4, particularly that of the KPIs associated with a target to be met, which is monitored on a monthly and annual basis. With them, it is possible to keep track of the evolution of the indicators and to maintain an adequate coordination and communication with the parties involved.

Additionally, before the end of the year and having previously made a forecast of the possible final values of the KPIs, AESA monitors the implementation status of the projects mentioned in the ESPP4 Performance Plan as well as new projects that may have been included in the NOP and ERNIP and that can have a positive effect in the environmental area, in order to know their evolution as well as the impact on the corresponding indicators.

The measures (specially FRA and FUA) are being implemented and future improvements are expected to be observed in the coming years.”

## **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: “In contrast to the KEA, the KEP indicator has remained practically at the same level as in 2024 (-1%), due to the fact that, when referring to the Flight Plan, the operational measures implemented have no influence on the indicator.

This PI is monitored by AESA. Should any significant deviations be identified, the possible causes will be analysed as part of the annual monitoring process, in collaboration with the relevant stakeholder.”

## **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: “As in the case of the KEP indicator, the KES has remained practically at the same level as in 2024 (-1%) despite the increase in traffic, due to the fact that, as it refers to the shortest plannable route, the operational measures implemented have no influence on the indicator.



*This PI is monitored by AESA. Should any significant deviations be identified, the possible causes will be analysed as part of the annual monitoring process, in collaboration with the relevant stakeholder.”*

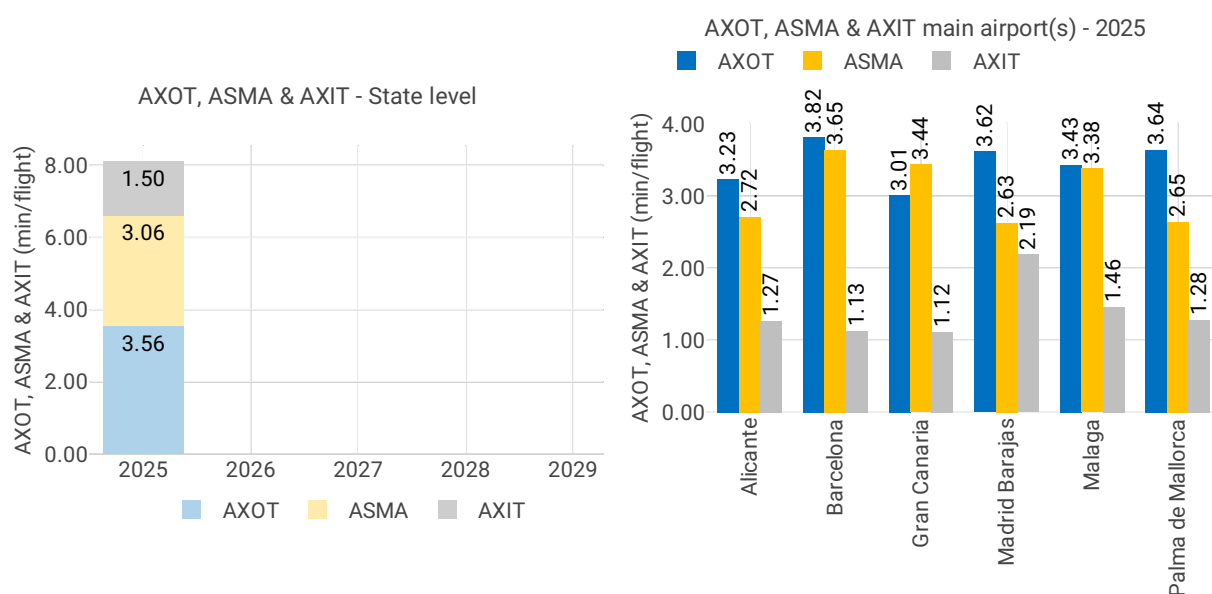
## Vertical flight efficiency

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: *“This is a recently introduced indicator, and data are currently only available for 2025. The value reached in 2025 of 75% indicates that three-quarters of the route distance is covered at optimal or near optimal levels. Its performance will be monitored throughout the reference period.*

*This PI is monitored by AESA. Should any significant deviations be identified, the possible causes will be analysed as part of the annual monitoring process, in collaboration with the relevant stakeholder.”*

## 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     |                                 |      |      |      |      |                             |      |      |      |      |                                |      |      |      |      |
|-------------------|---------------------------------|------|------|------|------|-----------------------------|------|------|------|------|--------------------------------|------|------|------|------|
| Airport           | Additional taxi-out time (PI#4) |      |      |      |      | Additional ASMA time (PI#6) |      |      |      |      | Additional taxi-in time (PI#5) |      |      |      |      |
|                   | 2025                            | 2026 | 2027 | 2028 | 2029 | 2025                        | 2026 | 2027 | 2028 | 2029 | 2025                           | 2026 | 2027 | 2028 | 2029 |
| Alicante          | 3.23                            | NA   | NA   | NA   | NA   | 2.72                        | NA   | NA   | NA   | NA   | 1.27                           | NA   | NA   | NA   | NA   |
| Barcelona         | 3.82                            | NA   | NA   | NA   | NA   | 3.65                        | NA   | NA   | NA   | NA   | 1.13                           | NA   | NA   | NA   | NA   |
| Gran Canaria      | 3.01                            | NA   | NA   | NA   | NA   | 3.44                        | NA   | NA   | NA   | NA   | 1.12                           | NA   | NA   | NA   | NA   |
| Madrid Barajas    | 3.62                            | NA   | NA   | NA   | NA   | 2.63                        | NA   | NA   | NA   | NA   | 2.19                           | NA   | NA   | NA   | NA   |
| Malaga            | 3.43                            | NA   | NA   | NA   | NA   | 3.38                        | NA   | NA   | NA   | NA   | 1.46                           | NA   | NA   | NA   | NA   |
| Palma de Mallorca | 3.64                            | NA   | NA   | NA   | NA   | 2.65                        | NA   | NA   | NA   | NA   | 1.28                           | NA   | NA   | NA   | NA   |



## Focus on AXOT, AXIT & ASMA

### AXOT

Six Spanish airports are subject to the monitoring of this indicator: Madrid – Barajas, Barcelona, Palma de Mallorca, Málaga, Gran Canaria and Alicante. All of them except Alicante maintained the indicator within 0.1 minutes of variation compared to 2024.

Additional time in Madrid – Barajas in 2025 was equal to 3.62 min/dep, very close to 2024 value – last year of RP3 – of 3.65 min/dep.

Additional time in Barcelona in 2025 was equal to 3.82 min/dep, very close to 2024 value – last year of RP3 – of 3.78 min/dep.

Additional time in Palma de Mallorca in 2025 was equal to 3.64 min/dep, very close to 2024 value – last year of RP3 – of 3.70 min/dep.

Additional time in Málaga in 2025 increased to 3.43 min/dep, 4% higher than 2024 value – last year of RP3 – of 3.31 min/dep.

Additional time in Gran Canaria in 2025 decreased to 3.01 min/dep, 4% lower than 2024 value – last year of RP3 – of 3.12 min/dep.

Additional time in Alicante in 2025 increased to 3.23 min/dep, 5% higher than 2024 value – last year of RP3 – of 3.09 min/dep.

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

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: *“The additional taxi out time (aggregated for the 6 airports monitored in RP4) has remained stable (+0,01 min/flight) compared with 2024 while traffic has increased by 3,5%.*

*In general, the highest additional taxi-out times throughout the year occur during the high season months of each airport, variations in this indicator are related to traffic especially at airports such as LEPA and LEMG.*

*In 2025 taxi times at LEMG and LEAL are higher than 2024 (+3,7% for LEMG and +4,5% for LEAL) due to traffic increase (+7% in LEMG and +16% in LEAL). Additionally, Barcelona and Palma airports experienced frequent adverse weather conditions over several months.*

*There is work in progress regarding the improvement of A-CDM in Madrid, Barcelona, Palma y Málaga:*

- *The project related to more accurate Taxi times/stand is almost finished.*
- *New TWR UPDATE A-DPI has already been implemented.*

*LEIB is monitored together with these 6 airports as it is one of the airports considered in the Spanish performance plan (ESPP4) for RP4. In 2025 it reaches a value of 2,97, lower (-5,4%) than the 2024 value (3,14). The additional taxi-out time (aggregated for the 7 airports monitored in RP4) has a value of 3,53 the same as in 2024.*

*This PI is monitored by AESA. Should any significant deviations be identified, the possible causes will be analysed as part of the annual monitoring process, in collaboration with the relevant stakeholder.”*



## AXIT

Six Spanish airports are subject to the monitoring of this indicator: Madrid – Barajas, Barcelona, Palma de Mallorca, Málaga, Gran Canaria and Alicante.

The additional time in 2025 was equal to 2.19 min/arr in Madrid, 1.13 min/arr in Barcelona, 1.28 min/arr in Palma, 1.46 min/arr in Málaga, 1.12 min/arr in Gran Canaria and 1.27 min/arr in Alicante.

The average for RP4 airports subject to monitoring of this indicator across Member States in 2025 was 1.71 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: *“The additional taxi-in time (aggregated for the 6 airports monitored in RP4) has remained stable (+0,02 min/flight) compared with 2024 while traffic has increased by 3,5%.*

*In general, the highest additional taxi-in times throughout the year occur during the high season months of each airport, variations in this indicator are related to traffic especially at airports such as LEPA and LEMG.*

*In 2025 taxi-in times at LEMD are higher than 2024. Additionally, the number of heavy aircraft operating at the airport increased (+4,5%). The observed increase in taxi-in time in LEMD is mainly due to works carried out on the taxiway system near RWY 32L, particularly on sections A and M (information in SUP 163/24).*

*LEIB is monitored together with these 6 airports as it is one of the airports considered in the Spanish performance plan (ESPP4) for RP4. In 2025 it reaches a value of 1,43, higher (5,1%) than the 2024 value (1,36). The additional taxi-in time (aggregated for the 7 airports monitored in RP4) has a value of 1,50, +1,4% higher than the previous year (1,48).*

*This PI is monitored by AESA. Should any significant deviations be identified, the possible causes will be analysed as part of the annual monitoring process, in collaboration with the relevant stakeholder.”*

## ASMA

Six Spanish airports are subject to the monitoring of this indicator: Madrid – Barajas, Barcelona, Palma de Mallorca, Málaga, Gran Canaria and Alicante.

Additional time in Madrid – Barajas in 2025 decreased to 2.63 min/arr, 6% lower than 2024 value – last year of RP3 – of 2.81 min/arr.

Additional time in Barcelona in 2025 increased to 3.65 min/arr, 6% higher than 2024 value – last year of RP3 – of 3.43 min/arr.

Additional time in Palma de Mallorca in 2025 was equal to 2.65 min/arr, very close to 2024 value – last year of RP3 – of 2.64 min/arr.

Additional time in Málaga in 2025 decreased to 3.38 min/arr, 5% lower than 2024 value – last year of RP3 – of 3.57 min/arr.

Additional time in Gran Canaria in 2025 decreased to 3.44 min/arr, 15% lower than 2024 value – last year of RP3 – of 4.04 min/ arr.

Additional time in Alicante in 2025 decreased to 2.72 min/arr, 4% lower than 2024 value – last year of RP3 – of 2.84 min/ arr.



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: *“The additional time in terminal area (aggregated for the 6 airports monitored in RP4) has decreased by 2,7% in 2025 compared to 2024, despite traffic increased (+3,5%).*

*In general, the highest additional ASMA times throughout the year occur during the high season months of each airport, variations in this indicator are related to traffic especially at airports such as LEPA and LEMG. Additionally, Barcelona and Palma airports experienced frequent adverse weather conditions over several months.*

*Some restructuring projects have been implemented in recent years:*

- Reorganization of Canarias TMA
- PBN STARs and RNP APCH in Madrid TMA

*Some restructuring projects are planned for the coming years in the main TMAs in Spain:*

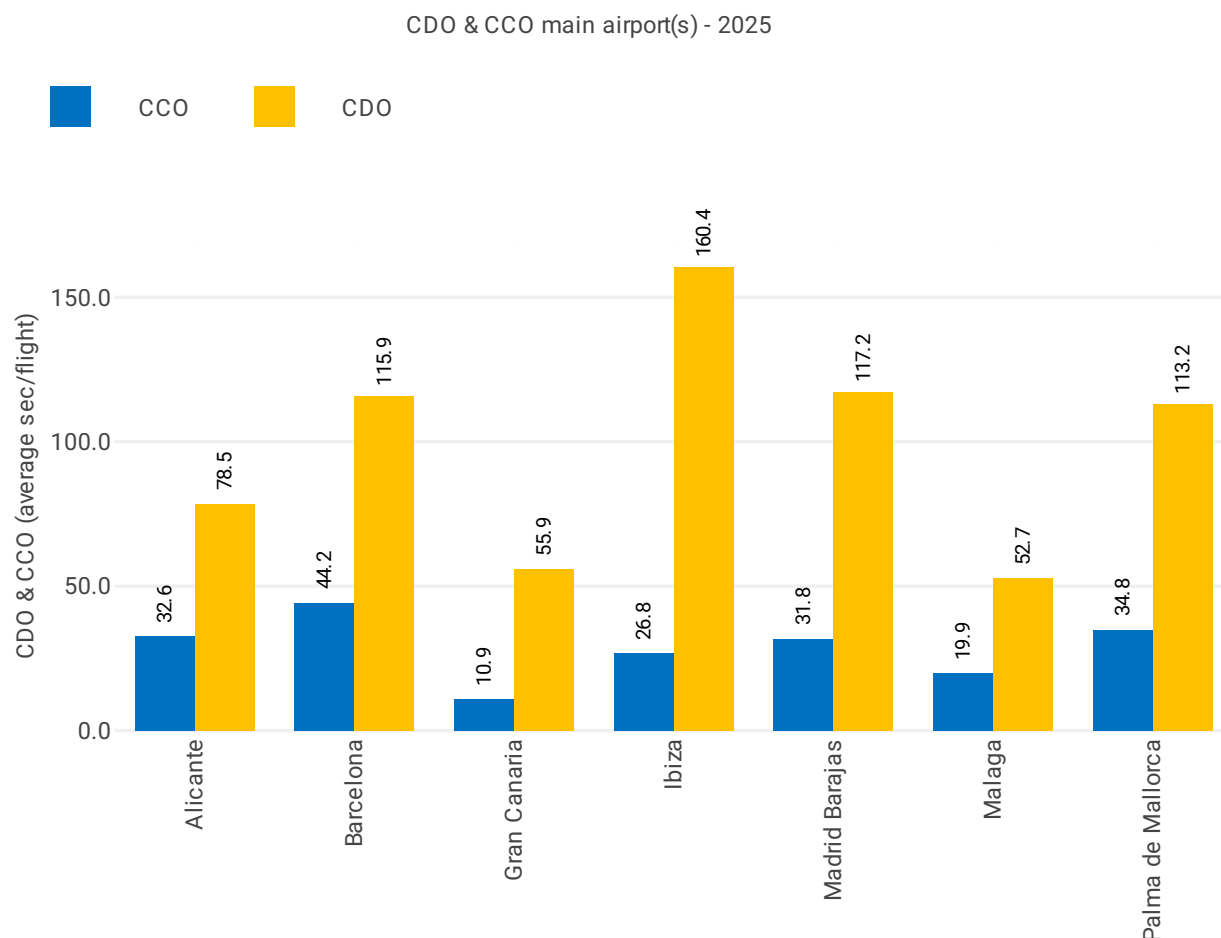
- PBN SIDs, ILS & RNP APCH in Palma TMA

*LEIB is monitored together with these 6 airports as it is one of the airports considered in the Spanish performance plan (ESPP4) for RP4. In 2025 it reaches a value of 2,42, lower (-6,9%) than the 2024 value (2,60). The additional time in terminal airspace (aggregated for the 7 airports monitored in RP4) has a value of 3,02, -2,9% lower than the previous year (3,11).*

*This PI is monitored by AESA. Should any significant deviations be identified, the possible causes will be analysed as part of the annual monitoring process, in collaboration with the relevant stakeholder.”*



### 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 46.7 seconds per flight lower in Spain. The highest average time flown level during descent happens at Ibiza (LEIB) (160.4 seconds per flight), while the lowest happens at Malaga (LEMG) (52.7 seconds per flight).

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: *"This is a recently introduced indicator. In 2025 the indicator (aggregated for the 7 airports monitored in RP4) stands at 102,5 seconds, representing a 4,1% improvement compared with 2024. Its performance will be monitored throughout the reference period."*

*This PI is monitored by AESA. Should any significant deviations be identified, the possible causes will be analysed as part of the annual monitoring process, in collaboration with the relevant stakeholder."*



## Vertical flight efficiency of the climb

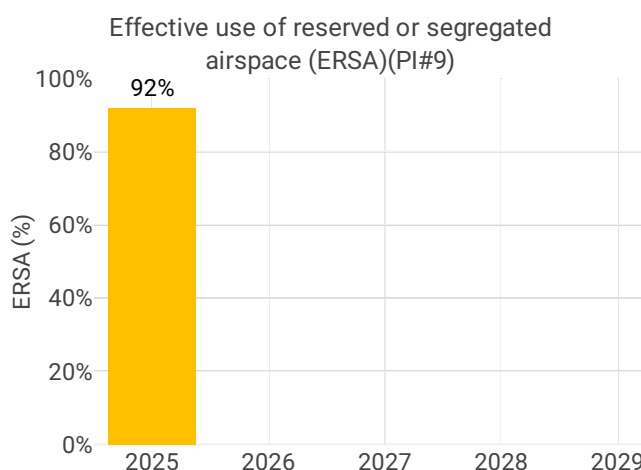
Compared to the overall RP4 average value (34.8 seconds per flight), average times flown level during climb are on average 3.1 seconds per flight lower in Spain. The highest average time flown level during climb happens at Barcelona (LEBL) (44.2 seconds per flight), while the lowest happens at Gran Canaria (GCLP) (10.9 seconds per flight).

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: *“This is a recently introduced indicator. In 2025 the indicator (aggregated for the 7 airports monitored in RP4) stands at 31,7 seconds, representing a 5,8% increase (+2 seconds of level flight time) compared with 2024. Its performance will be monitored throughout the reference period.*

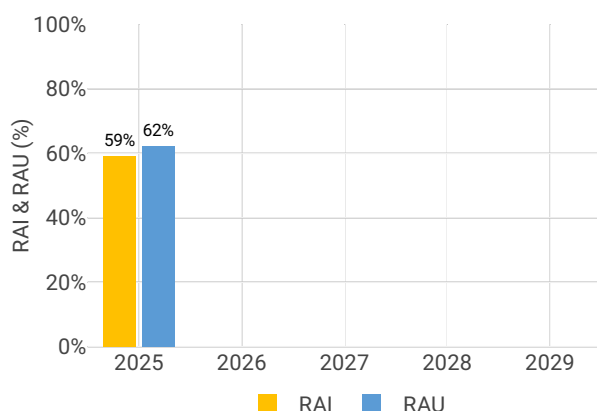
*This PI is monitored by AESA. Should any significant deviations be identified, the possible causes will be analysed as part of the annual monitoring process, in collaboration with the relevant stakeholder.”*

| 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 |
| Gran Canaria      | 10.9                          | NA   | NA   | NA   | NA   | 55.9                            | NA   | NA   | NA   | NA   |
| Alicante          | 32.6                          | NA   | NA   | NA   | NA   | 78.5                            | NA   | NA   | NA   | NA   |
| Barcelona         | 44.2                          | NA   | NA   | NA   | NA   | 115.9                           | NA   | NA   | NA   | NA   |
| Ibiza             | 26.8                          | NA   | NA   | NA   | NA   | 160.4                           | NA   | NA   | NA   | NA   |
| Madrid Barajas    | 31.8                          | NA   | NA   | NA   | NA   | 117.2                           | NA   | NA   | NA   | NA   |
| Malaga            | 19.9                          | NA   | NA   | NA   | NA   | 52.7                            | NA   | NA   | NA   | NA   |
| Palma de Mallorca | 34.8                          | NA   | NA   | NA   | NA   | 113.2                           | NA   | NA   | NA   | NA   |

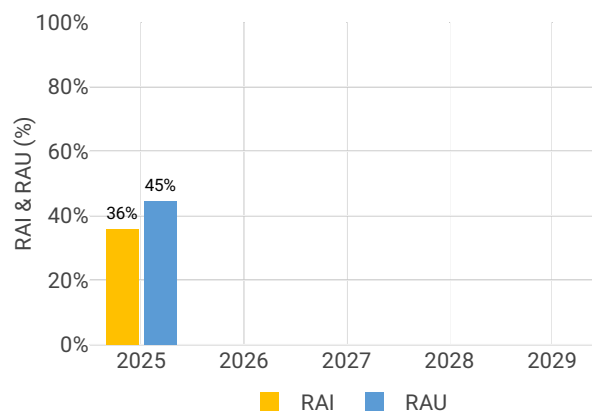
## 3.4 Civil-Military dimension



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



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



## Focus on Civil-Military dimension

### Effective use of reserved or segregated local airspace

SPAIN reports a ratio of **53%**

- Total number of hours allocated & notified to NM: **36,479**
- Total number of hours used: **19,353**

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: *“NSA MIL monitors values and promotes a better adjustments on the booked them to the needs. 2025 shows a reduction in the amount of allocated hours, showing an effort to increase the efficiency in the planning process. It is worth to highlight that Spain provides with actual use figures, instead of ERSA.*

*This indicator is provided by the Spanish Air Force NSA.”*

### Rate of planning via available airspace structures

SPAIN reports that:

- The ratio of planning via available airspace structures is **66%** (via available restricted and segregated airspaces)
- The ratio of planning via available airspace structures is **21%** (via available conditional routes – CDR)

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: *“In the coming years, we aim to improve this Performance Indicator (PI) through a number of measures, continuing with the introduction of new FUA restrictions to allow additional traffic flows through RSAs with military activity, the development of adjustable boundary procedures, the implementation of modular RSAs and improvements in the management of military RPAS activity. In addition, the implementation of FRA is expected to support more efficient flight planning through optimal routing.*

*This PI is monitored annually to evaluate the evolution of the indicators because our ANSP, ENAIRE, which provides the data to calculate the indicator, requests it from Eurocontrol.*



*Should any significant deviations be identified, the possible causes will be analysed as part of the annual monitoring process, in collaboration with the relevant stakeholder."*

### **Rate of using available airspace structures**

SPAIN reports that:

- The ratio of the use of the available airspace structures is **70%** (via available restricted and segregated airspaces)
- The ratio of the use of the available airspace structures is **56%** (via available conditional routes – CDR)

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: *"In the coming years, we aim to improve this Performance Indicator (PI) through a number of measures, continuing with the introduction of new FUA restrictions to allow additional traffic flows through RSAs with military activity, the development of adjustable boundary procedures, the implementation of modular RSAs and improvements in the management of military RPAS activity. In addition, the implementation of FRA is expected to support more efficient flight planning through optimal routing.*

*This PI is monitored annually to evaluate the evolution of the indicators because our ANSP, ENAIRE, which provides the data to calculate the indicator, requests it from Eurocontrol. Should any significant deviations be identified, the possible causes will be analysed as part of the annual monitoring process, in collaboration with the relevant stakeholder."*



## 4 CAPACITY - SPAIN

### 4.1 PRB monitoring

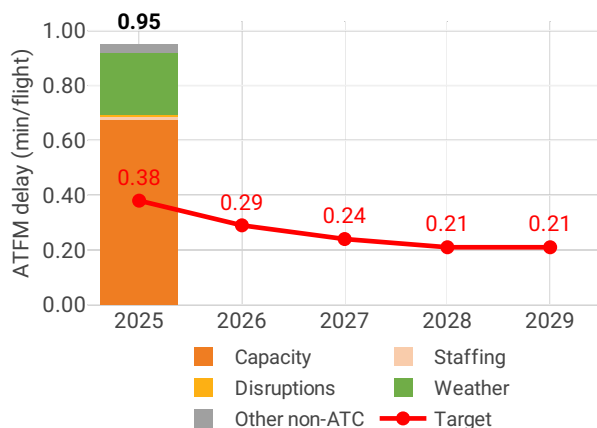
- Spain registered 0.99 minutes of average en route ATFM delay per flight during 2025, which has been adjusted to 0.95 during the post-ops adjustment process, thus not achieving the local target value of 0.38. Delays in Spain decreased by -0.05 minutes per flight year-on-year.
- Delays were highest in July and August, mostly driven by ATC capacity and weather.
- The share of delayed flights with delays longer than 15 minutes in Spain decreased by -3 percentage points compared to 2024 and was lower than 2019 values.
- The actual number of ATCOs in OPS in Spain was 1,306 FTEs, -1.7% or -23 FTEs below the planned level. The actual number of ATCOs in OPS was below the planned number for all five ACCs: 181 FTEs in Canarias ACC, -1 FTE below the plan; 373 FTEs in Barcelona ACC, -8 FTEs below the plan; 449 FTEs in Madrid ACC, -8 FTEs below the plan; 141 in Palma ACC, -2 FTEs below the plan; and 162 in Sevilla ACC, -5 FTE below the plan.
- All Spanish ACCs recorded a number of sector opening hours in 2025 above the level recorded in 2024. In Barcelona ACC sector opening hours were 113,168, showing a year-on-year increase of 5%, while in Canarias ACC the value increased by 2% to 56,485 sector hours. For Madrid (105,322), Palma (36,778) and Sevilla (47,953) ACCs the number of sector opening hours increased respectively by +9%, +3% and +10% compared to 2024.
- Barcelona ACC registered 9.87 IFR movements per sector opening hour in 2025, 1% above the 2024 level; Canarias ACC registered 7.67 IFR movements per sector opening hour, 3% above the 2024 level; Madrid ACC registered 12.63 IFR movements per sector opening hour, -4% below the 2024 level; Palma ACC registered 10.23 IFR movements per sector opening hour, -1% below 2024 levels; and Sevilla ACC registered 11.86 IFR movements per sector opening hour, -3% below the 2024.
- Spain registered an average airport arrival ATFM delay of 0.93 minutes per flight in 2025, thus not achieving the local target of 0.6 minutes. Compared to 2024, average arrival ATFM delays in Spain were -0.16 minutes per flight lower in 2025.
- The main drivers of delays were weather, accounting for 0.65 of total delays, and other non-ATC causes, responsible for 0.18.



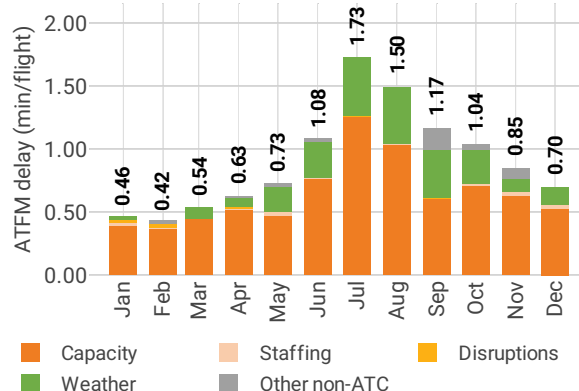
## 4.2 En route performance

### 4.2.1 En route ATFM delay (KPI#1)

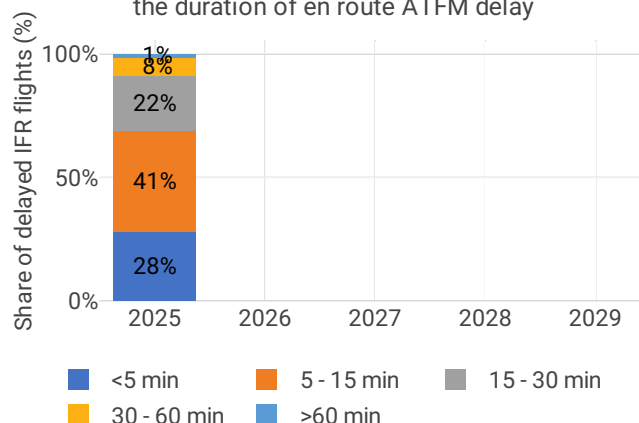
Average en route ATFM delay per flight by delay groups



Monthly distribution of en route ATFM delay by delay groups - 2025



Distribution of delayed IFR flights per the duration of en route ATFM delay



## Focus on en route ATFM delay

### En route ATFM delay

- Spain had 2,472k flights in 2025, up from 2,362k flights in 2024.
- ENAIRe applied en route ATFM regulations resulting in 2,457k minutes of delay, an increase from the 2,405k minutes in 2024.
- As part of the strategic traffic re-orientation programme (S25/NTDM) operated by the Network Manager, 43k minutes of delay originating in Spain were re-attributed to other ANSPs.
- Under the auspices of the Route Network (RN) Scenarios during Capacity & Weather Based Operations between June and September 2025, 7k minutes of en route ATFM delay were re-attributed to ENAIRe; 6k minutes of delay originating in Spain were re-attributed to other ANSPs.



- A further 42k minutes of en route ATFM delay, attributed to a national power failure, were excluded from the SES performance scheme, through agreement of ENAIRE, the Spanish NSA and the Network Manager. [The incentive scheme was not affected in this case, since the delays had already been classified as ‘Other’ and since the achieved performance by Spain was already beyond the point at which maximum penalties would be applied.]
- When the above post-operations re-attributions are factored in, the total en route delay for Spain in 2025 was 2,351k minutes in 2025, down from 2,404k 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: *“In 2025, once all the processes of the delay reattribution (post-ops, eNM25 and CWBO, including the adjustment due to power failure in Spain in April 2025, approved by NM in January 2026) have been applied the final average en-route ATFM delay per flight in Spain was 0.95 min/fl (that differs from the value included in the above table) , lower than the 2024 figure of 1.02 minutes per flight, even taking into account the significant increase in traffic in 2025, although it exceeded the performance target established in the Performance Plan.*

*The main driver of the en-route ATFM delay was ATC capacity (71%), accounting for approximately two thirds of the total delay, reflecting the strong traffic growth experienced in Spanish ACCs during 2025, especially compared to the traffic level in 2019 (+15% in ENAIRE, +19% in Barcelona ACC, +33% in Sevilla ACC). It is worth mentioning that the peak levels were heavier than in 2024, with daily figures up to +60% compared to 2019 figures for the same day in Sevilla ACC. Actual and forecasted demand is far higher than forecasted by STATFOR & in RP4. By 2025 demand already showed a deviation of around 4% compared to the forecasts in the Spanish Performance Plan, and according to the latest STATFOR forecasts (Base, March 2026), this deviation is expected to grow moderately during the RP4 period. Some staffing constraints, with last minute absences unable to be covered, have also been a relevant factor in terms of ATC Capacity & Staffing. Weather-related delays were the second most significant factor (24%), particularly during the summer period, driven by convective weather and resulting traffic re-routings; it is also important to highlight the continuous increase of the number of the convective phenomena affecting the Mediterranean area, especially Barcelona ACC.*

*Additional contributing factors included special events and disruptions, such as military exercises and temporary airspace restrictions, as well as ATC staffing limitations in specific periods.*

*Some of the Spanish ACCs (notably Barcelona, Madrid and Sevilla) experienced higher-than-average en-route ATFM delays, mainly due to traffic levels exceeding forecasts and the limited availability of sector capacity during peak periods, exceeding even elementary sectors capacity.”*

Regarding the description of the adjustments to the capacity plan included in adopted performance plan, the NSA reports: *“The adopted performance plan for 2025 reflects several adjustments, aimed at mitigating the impact of increasing traffic demand and improving en-route capacity delivery. These adjustments have required a stronger operational focus to address higher-than-forecast traffic levels and recurrent peak-period constraints, particularly in several ACCs. As a result, greater emphasis was placed on operational capacity delivery measures. These included intensified use of ATFM measures (notably STAM, occupancy- and complexity-based regulations), increased reliance on dynamic and optimised sector configurations,*



*and closer alignment of sector opening schemes with actual traffic demand, especially during the summer season.*

*In the staffing domain, although moderate ATCO increases were envisaged in the initial plan, the effectiveness of capacity delivery in 2025 relied more heavily on short-term availability measures, such as voluntary additional shifts during peak periods and optimisation of rostering and competency management processes.*

*Regarding airspace and system developments, several initiatives (such as the expansion of Free Route Airspace, advanced civil-military coordination, and the deployment of new ATM system functionalities including TTM) progressed during 2025 but with phased implementation timelines, resulting in limited immediate capacity benefits within the year. Consequently, interim operational solutions were prioritised to maintain network performance.*

*Overall, the adopted performance plan for 2025 reflects some adjustments from the initial strategic assumptions toward a more operationally driven capacity management approach, aimed at preserving performance and resilience under intensified traffic conditions, while maintaining the medium-term objectives.”*

*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: “Since January, the target set for Spain has been exceeded. Although the en-route traffic increase in Spain is very significant, 4,7% compared to 2024, the proportion of increase in ERD indicators has not been as high as in 2024, only LECB and LECM have continued to rise, whilst GCCC, LECS and LECP have seen their indicators decline compared with the previous year.*

*In all ACCs the main cause of delay is C-ATC Capacity, representing at least two-thirds of the total delay in each ACC. The ERD ATT indicator of attributable causes of delay (CRSTMP) has also not met its target at national level, as well as in LECB, LECM and LECS.*

*The W-Weather delay is not a determining factor, although it contributes to complex situations in some sectors.*

*The non-compliance of ERD was anticipated before the end of the year and was informed to the Commission according to Regulation (EU) 2019/317 Article 37 (1), concluding that the main reasons that have led to this situation are the increase in traffic over the STATFOR forecast set in 2024 and the inability to accommodate new personnel in the short term. Moroccan flows via Barcelona/Seville ACCs to avoid Algerian airspace increased saturation of LECB and LECS sectors. Demand drift during the day into the night shift has also led to delays at the end of the day. Weather/network scenarios in SE France/Pyrenees add complexity and volatility to sector loads in LECB. Higher volumes of overflights and oceanic flows created saturation in upper sectors and Santiago area in LECM.*

*As a result of the monitoring of the capacity plan and the evolution of the en-route capacity related projects, both of those initially set out in ESPP4 and the new ones considered in NOP, it was observed that about 40% of the planned projects had not been completed but there were some new projects, not initially planned, already implemented or under development. Nevertheless, progress in the implementation of projects is not as expected and the improvements in capacity obtained after the implementation of the completed projects plus the new projects have not been sufficient to meet the volume of traffic managed as well as the current characteristics of the delay in the different regions, resulting in the non-compliance with the targets.”*



Regarding recommendations to the ANSP to rectify the situation, the NSA reports: *“In the report to the Commission, some of the additional measures planned by ENAIRE were explained. The common pillars are the incorporation of new ATCOs, improvement of the coordination and operational procedures related to bad weather situations, reorganization and strengthening of Regional FMPs, airspace use & network integration (DCTs, RAD, civil-military coordination), review of OTMV in high delay sectors and tools to reduce admin load.*

*Endorse ENAIRE to continue implementing the capacity plan according to the scheduled timetable in order to achieve the objectives of delays and better air traffic management, focusing on projects that have an impact on the increase of available capacity, as well as on the implementation of projects that improve operations to manage traffic increases.”*

Regarding remedial measures that have been / will be taken by the ANSP to rectify the situation, the NSA reports: *“ENAIRE has implemented a set of remedial measures aimed at reducing en-route ATFM delays and improving overall capacity performance. These measures include a productivity incentive program for ATCO (June - September), additional ATCO recruiting program, implementation of ATFM Regulations based on Occupancy and ongoing revisions of sector capacities with regular performance monitoring.*

*Operational measures such as the deployment of new direct routings, enhanced civil-military coordination, and continuous improvement in the application of STAM and dynamic sector configurations are being pursued.*

*In parallel, ENAIRE is progressing with ATM system modernisation initiatives, including the further deployment of TTM tools, to unlock additional capacity and improve predictability in future performance years, as well as intensive use of CPDLC.”*

Regarding follow up of the remedial measures indicated in the previous monitoring report(s), the NSA reports: *“AESA continues its monitoring activities in RP4, particularly that of the KPIs associated with a target to be met, which is monitored on a monthly and annual basis. With them, it is possible to keep track of the evolution of the indicators and to maintain an adequate coordination and communication with the parties involved.*

*Additionally, before the end of the year and having previously made a forecast of the possible final values of the KPIs, AESA monitors the implementation status of the projects mentioned in the ESPP4 Performance Plan as well as new projects that may have been included in the NOP and that can have a positive effect in the capacity area, in order to know their evolution as well as the impact on the corresponding indicators.*

*The measures are being implemented and future improvements are expected to be observed in the coming years.”*

### **En route capacity incentive scheme**

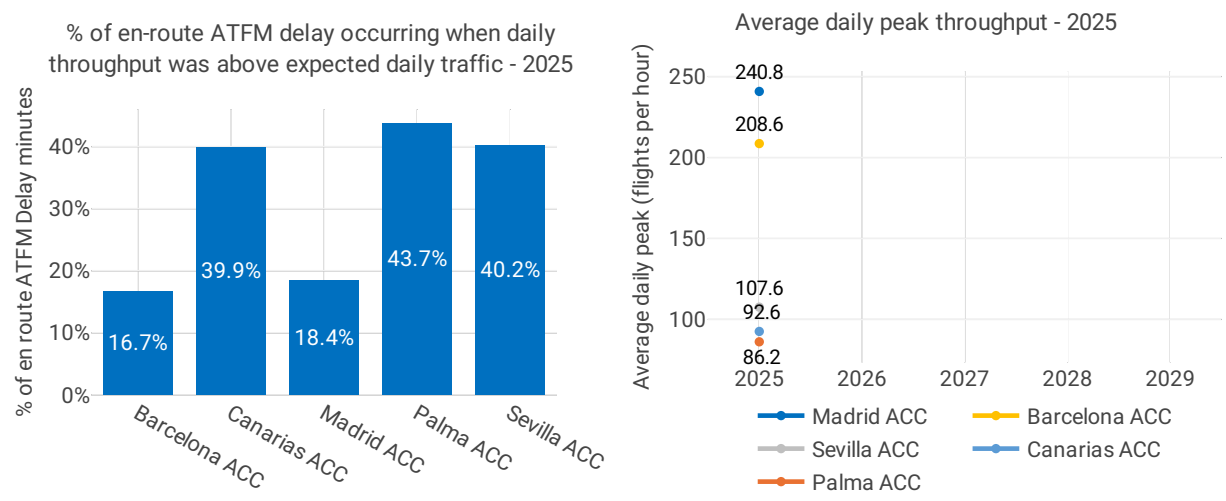
The Spanish NSA reports a financial penalty of €7,785,082 for the ANSP because of the 2025 performance. The local incentive target for en route ATFM delays, due to CRSTMP causes only, was set at 0.2890 mins/flight.

The NSA reports an achieved performance of 0.71 mins/flight, including the post ops adjustments mentioned above.

[NB The attribution of original delay causes on the [ansperformance.eu](https://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

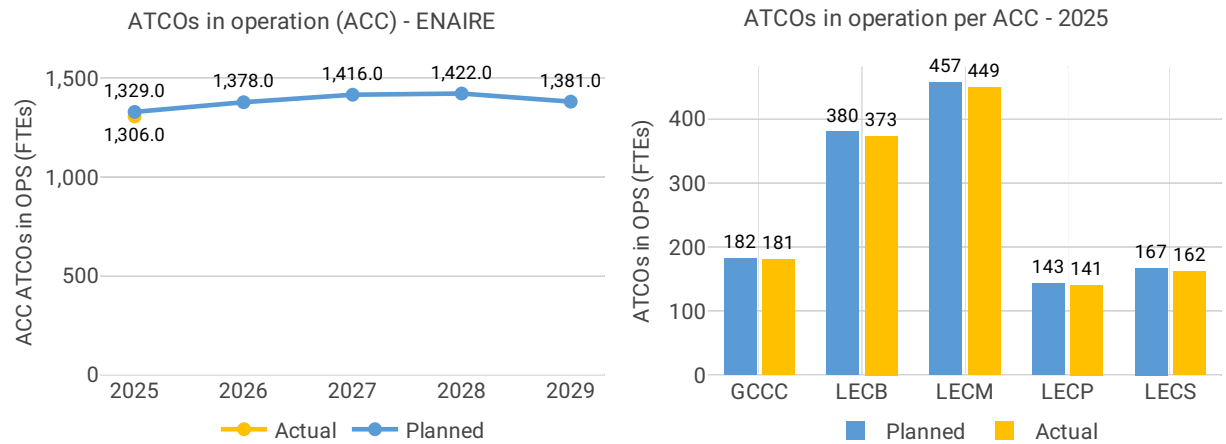
Percentage of total en route ATFM delay that occurred on days when the daily throughput was above the expected daily traffic

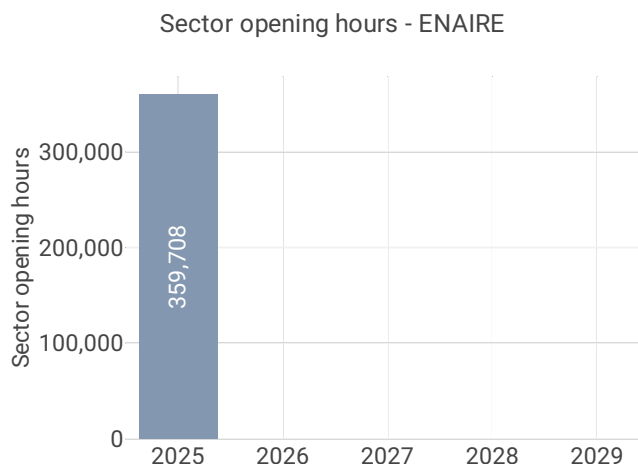
As background information on actual performance, the NSA reports: “2025 is the first year this performance indicator has been monitored, so there is no information from previous years to compare it with.”

Annual weighted average of the daily peak throughput

As background information on actual performance, the NSA reports: “2025 is the first year this performance indicator has been monitored, so there is no information from previous years to compare it with.”

4.2.3 Other en route information





### Focus on other en route information

*“Number of additional ATCOs in OPS planned to start working in the OPS room (FTEs)” it's been considered all the operative ATCOs (C4) who started working for all reasons: CMCD, transfer, secondment, article 88 (II ATCOs collective bargaining agreement), new recruitments, unpaid leave return (voluntary or without job post reservation), change of designation, etc.*

*“Number of ATCOs in OPS planned to stop working in the OPS room (FTEs)” it's been considered all the operative ATCOs (C4) who stopped working for all reasons: retirements, RAE or RA concessions, dismissals, CMCD, transfer, end of a secondment, end of article 88 application, voluntary unpaid leave, change of designation, etc.”*

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: *“The allocation of positions among the different ENAIRE units is carried out before the air traffic controller recruitment process is opened. Following the internal staff transfer process, the vacancies are offered through the competitive selection process, having been calculated on the basis of expected traffic and other operational parameters.*

*Candidates who pass the selection process are given 18 months to meet the required qualifications, including the SATCO licence with all ratings and rating endorsements, a valid Class 3 Medical Certificate (CIMA), and the required level of language proficiency.*

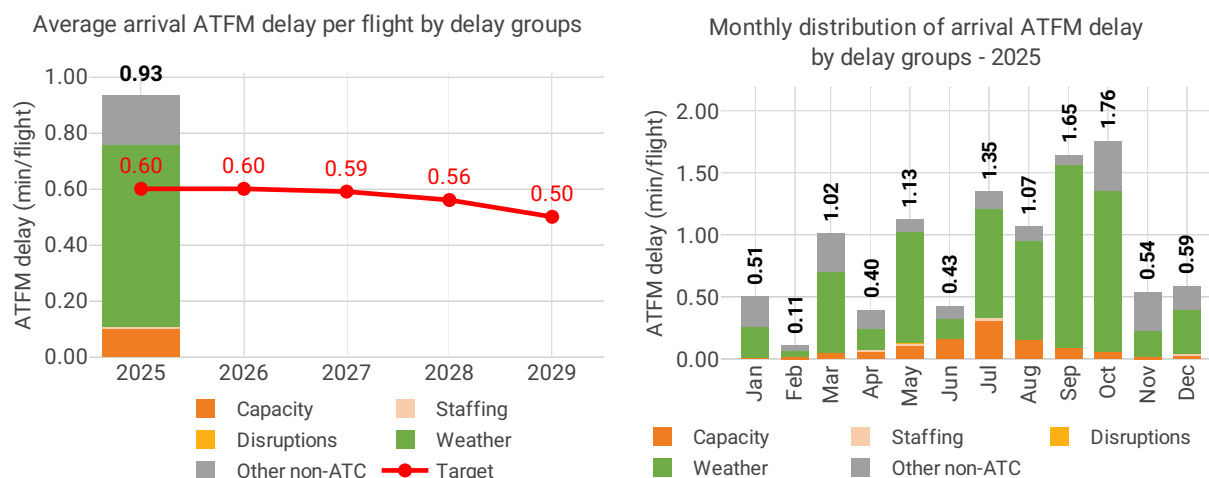
*Once candidates have signed their contract with ENAIRE, they may begin unit training at their assigned unit.*

*The failure rate is low.”*



## 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 Spain was 0.93 min/arr in 2025, the first year of RP4. The performance has improved compared to 2024, last year of RP3, when there were 1.10 min/arr.

Palma de Mallorca suffered the highest ATFM arrival delay with 1.97 min/arr, which was nevertheless a small improvement from 2.07 min/arr in 2024. The main reasons behind are weather regulations, combined with ATC Capacity shortages during high demand season (May to October).

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: *"In 2025, once all the processes of the delay reattribution (post-ops and eNM25, including the adjustment due to power failure in Spain in April 2025, approved by NM in January 2026) have been applied, the final average of the arrival ATFM delay per flight in Spain (in the 7 main airports at national level) is 0,93 min/arr, representing a clear improvement compared with 2024, when the corresponding value was 1.10 minutes per flight, despite still remaining above the target value set in the Performance Plan.*

*The 2025 arrival delay result corresponding to ENAIRE, once the distribution of delays between ENAIRE and Skyway has been carried out, is 0.91 min/arr, which represents a 15% improvement over the previous year. This improvement is also evident when analyzing arrival delays causes attributable to ENAIRE, which improved from 0.17 min/arr in 2024 to 0.14 min/arr in 2025 (a 19% of improvement).*

*By may, 4 of the 7 airports were already failing to meet their target, as well as the national target (SPA7). In general, the indicators have improved except for LEMG and LEAL. Adverse weather conditions, including convective weather and wind-related disruptions, weighted*



around 69% of the total minutes of delay (focused in LEBL and LEPA), and contributed to a great extent in the arrival ATFM delays, both directly and through knock-on effects on airport operations and arrival sequencing. The second leading cause of delay is G-Aerodrome Capacity (14% of the 2025 total), focused on GCLP. The third cause of delay is C-ATC Capacity (11% of the 2025 total, focused on LEPA and LEMD).

The achieved level of performance in 2025 was mainly influenced by capacity-related constraints at major airports during peak traffic periods, particularly in the summer season. Airports with the highest traffic figures, such as Madrid-Barajas, Barcelona, Palma de Mallorca and Gran Canaria, experienced arrival delays when demand temporarily exceeded available runway capacity, combined with limited operational flexibility during peak hours, more pronounced than in previous year and involving a direct impact on the delay figures generated. Gran Canaria stands out for G-Aerodrome capacity delays and LEPA and LEMD for C-ATC Capacity delays, although the total number of minutes is lower than in 2024. Overall, the improvement observed compared with the previous year reflects the positive impact of operational and capacity-related actions implemented since 2024; however, continued traffic growth and the concentration of demand at coordinated airports limited the extent to which further delay reductions could be achieved within the 2025 calendar year.

Regarding the particularity of the LEAL and LEIB airports, in which different ANSPs are involved, SKYWAY (Aerodrome ATC service provider) and ENAIRE (Approach ATC service provider), according to the document "Monitoring of delays in arrivals in RP3 for Alicante and Ibiza airports" prepared by AESA, the part of delay that would correspond to ENAIRE or SKYWAY (previously FerroNATS) for these two airports would be as follows:

- LEAL: ENAIRE: 0,02 min/flight. SKYWAY: 0,13 min/flight. Delay minutes due to G-Aerodrome Capacity and W-Weather mainly. Attributable delay causes (CRSTMP) is almost zero.
- LEIB: ENAIRE: 0,08 min/flight. SKYWAY: 0,19 min/flight. Delay minutes due to W-Weather and G-Aerodrome Capacity mainly. Attributable delay causes (CRSTMP) is almost zero."

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 targets have been exceeded both at the Spanish level and at 5 airports. W-Weather was the first cause of delay at national level and very significant at LEBL and LEPA, G-Aerodrome Capacity was the next cause due mainly to the minutes accumulated in GCLP and, to a lesser extent, in LEMG, LEMD and LEBL. C-ATC Capacity was the third most common cause, particularly in LEPA, LEMD and LEMG. The minutes for these main causes across all 7 airports (SPA7) were slightly lower than in 2024.

The TAD ATT indicator of attributable causes of delay (CRSTMP) has met its target at national level but has not done so at 3 airports (LEPA, LEMG and GCLP).

The non-compliance of TAD was anticipated before the end of the year and was informed to the Commission according to Regulation (EU) 2019/317 Article 37 (1), concluding that the main reasons that have led to this situation are meteorological issues especially in the warm Mediterranean Sea. Environmental concerns in LEPA that have been delaying implementation of capacity improving projects. Shifts in demand during the day that bring higher than expected traffic counts to the night shift in LEPA and LEMG. Stronger seasonality year after year and structural demand growth in LEMG. In GCLP the main factor has been Aerodrome Capacity, Runway sharing with Spanish Air Force and large-scale military exercises. As a result of the



*monitoring of the capacity plan and the evolution of the arrival capacity related projects initially set out in ESPP4, it was observed that the delay in the projects planned prior to ESPP4 (SACTA iTEC 4.1, Stripless TMA and RECAT departures) is not a determining factor because Weather delay is the most relevant factor in not achieving the targets. The improvements in capacity have not been sufficient to meet the volume of traffic managed as well as the current characteristics of the delay in the different regions, together with the occurrence of bad weather, resulting in the non-compliance with the targets.”*

*Regarding recommendations to the ANSP to rectify the situation, the NSA reports: “In the report to the Commission, some of the additional measures planned by ENAIRE were explained. On the one hand, on improving capacity and operations, such as progressive increases in capacity at LEMD, GCLP and LEIB APP, refinement of A-CDM integration, RECAT departures, Godox sector split to improve LEPA, improvements in sector structures such as NB (affecting GCLP) or Levante sectors (affecting LEAL) and, on the other hand, focus on improvements in processes related to Weather, such as improving coordination with NM in cross-border, adjustments in the Central sector affecting LEBL or the standardisation of ramp-up/down after Weather.*

*Encourage ENAIRE to continue implementing the capacity plan in order to achieve the objectives of delays and better air traffic management, focusing on projects that have an impact on the increase of available capacity, on the implementation of projects that improve operations to manage traffic increases and projects that can reduce the impact of weather.”*

*Regarding remedial measures that have been / will be taken by the ANSP to rectify the situation, the NSA reports: “ENAIRE has continued to implement a range of actions aimed at improving terminal and airport arrival performance, focusing on both operational efficiency and capacity provision. These actions include the recruiting of additional ATCO for TWR & TMA, optimisation of TMA sector configurations and enhanced application of ATFM measures at airport level, including sequencing, regulation refinement, improved use of available capacity and additional capacity according to the capacity program agreed with AENA. ENAIRE is also progressing with operational improvements, including the gradual deployment of ATM system upgrades, such as P-DPI or OSF, which are expected to support improved arrival management and capacity utilisation in the coming years.”*

*Regarding follow up of the remedial measures indicated in the previous monitoring report(s), the NSA reports: “AESA continues its monitoring activities in RP4, particularly that of the KPIs associated with a target to be met, which is monitored on a monthly and annual basis. With them, it is possible to keep track of the evolution of the indicators and to maintain an adequate coordination and communication with the parties involved.*

*Additionally, before the end of the year and having previously made a forecast of the possible final values of the KPIs, AESA monitors the implementation status of the projects mentioned in the ESPP4 Performance Plan as well as new projects that may have been included in the NOP and that can have a positive effect in the capacity area, in order to know their evolution as well as the impact on the corresponding indicators.*

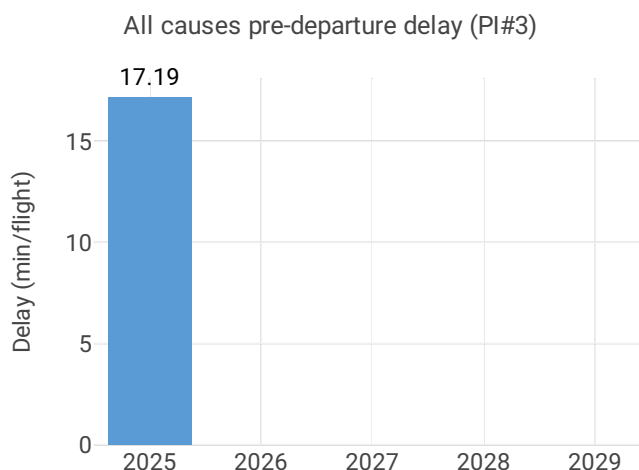
*The measures are being implemented and future improvements are expected to be observed in the coming years.”*



## Terminal capacity incentive scheme

In the first year of RP4, with an ATFM Arr delay of 0.93 min/arr, Spain did not achieve the national target of 0.60 min/arr. However, the pivot value for incentives (0.1796 min/arr) is limited to CRSTMP delay causes. According to the NSA, the CRSTMP attributable to ENAIRE is 0.14042 min/arr – Alicante and Ibiza ATC Towers are managed by Skyway and subject to market conditions. As such, the value falls within the deadband for the incentive scheme, no bonus or penalty applies.

### 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 |
| Alicante          | 0.15                           | NA   | NA   | NA   | NA   | 99.7%                 | NA   | NA   | NA   | NA   |
| Barcelona         | 1.35                           | NA   | NA   | NA   | NA   | 99.4%                 | NA   | NA   | NA   | NA   |
| Gran Canaria      | 1.28                           | NA   | NA   | NA   | NA   | 98.0%                 | NA   | NA   | NA   | NA   |
| Ibiza             | 0.28                           | NA   | NA   | NA   | NA   | 99.6%                 | NA   | NA   | NA   | NA   |
| Madrid Barajas    | 0.43                           | NA   | NA   | NA   | NA   | 97.8%                 | NA   | NA   | NA   | NA   |
| Malaga            | 0.48                           | NA   | NA   | NA   | NA   | 95.7%                 | NA   | NA   | NA   | NA   |
| Palma de Mallorca | 1.97                           | NA   | NA   | NA   | NA   | 99.1%                 | 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 |
| Alicante          | 0.60                           | NA   | NA   | NA   | NA   | 17.7                                  | NA   | NA   | NA   | NA   |
| Barcelona         | NA                             | NA   | NA   | NA   | NA   | 16.7                                  | NA   | NA   | NA   | NA   |
| Gran Canaria      | NA                             | NA   | NA   | NA   | NA   | 14.3                                  | NA   | NA   | NA   | NA   |
| Madrid Barajas    | NA                             | NA   | NA   | NA   | NA   | 16.5                                  | NA   | NA   | NA   | NA   |
| Malaga            | 0.48                           | NA   | NA   | NA   | NA   | 17.5                                  | NA   | NA   | NA   | NA   |
| Palma de Mallorca | NA                             | NA   | NA   | NA   | NA   | 20.3                                  | NA   | NA   | NA   | NA   |



## Focus on other terminal performance indicators

### ATFM slot adherence

ATFM slot adherence in 2025 was equal to 98.4%, very close to 2024 value – last year of RP3 – of 98.1%. With regard to the 1.6% of flights that did not adhere, 1.2% were early and 0.4% were late.

All individual airports monitored in RP4 achieved over 95% adherence, and many (Barcelona, Palma, Alicante, Ibiza) achieved over 99%.

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: *“The result for 2025 (aggregate of the 7 airports subject to monitoring) improves by 0,4% the result of the previous year, being all results well above the value of 80% set in Regulation (EU) No. 255/2010 of the Commission. ANSPs analyse trends which, if negative, would be corrected. Based on current figures, ANSPs does not believe it is necessary to establish specific improvement measures.*

*This PI is monitored by AESA. Should any significant deviations be identified, the possible causes will be analysed as part of the annual monitoring process, in collaboration with the relevant stakeholder.”*

### ATC pre-departure delay

The calculation of the ATC pre-departure delay is based on the data provided by the airport operators through the Airport Operator Data Flow (APDF) which is properly implemented at all 6 Spanish airports subject to monitoring of this indicator.

However, there are several quality checks before EUROCONTROL can produce the final value which is established as the average minutes of pre-departure delay (delay in the actual off block time) associated to the IATA delay code 89 (through the APDF, for each delayed flight, the reasons for that delay have to be transmitted and coded according to IATA delay codes.

However, sometimes the airport operator has no information concerning the reasons for the delay in the off block, or they cannot convert the reasons to the IATA delay codes. In those cases, the airport operator might:

- Not report any information about the reasons for the delay for that flight (unreported delay)
- Report a special code to indicate they do not have the information (code ZZZ)
- Report a special code to indicate they do not have the means to collect and/or translate the information (code 999)

To be able to calculate with a minimum of accuracy the PI for a given month, the minutes of delay that are not attributed to any IATA code reason should not exceed 40% of the total minutes of pre-departure delay observed at the airport.

Finally, to be able to produce the annual figure, at least 10 months of valid data is requested by EUROCONTROL.



The high share of unidentified delay reported by 4 out of the 6 Spanish airports under monitoring (Madrid, Barcelona, Gran Canaria and Palma de Mallorca) prevent the calculation of this indicator. Ibiza is not subject to the monitoring of this indicator.

Delay in Alicante in 2025 was equal to 0.60 min/dep, very close to 2024 value– last year of RP3 – of 0.63 min/dep.

Delay in Málaga in 2025 was equal to 0.48 min/dep, very close to 2024 value– last year of RP3 – of 0.53 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.

As background information on actual performance, the NSA reports: *“The final result of this indicator is N/A due to some of monthly data are not available.*

*There has been an improvement in the reporting of monthly data. LEIB, LEPA, LEMD and LEBL report data for less than half of the months, but with the exception of LEIB, they have improved by increasing the number of months for which data is reported. GCLP reports data for more than half of the months, and this figure has increased compared to 2024. Only LEAL and LEMG provide data every month, and a reduction in the indicator value is observed at both airports compared with 2024,*

*LEIB it is monitored together with these 6 airports since it is one of the airports considered in the Spanish performance plan (ESPP4) for RP4.*

*This PI is monitored by AESA. Should any significant deviations be identified, the possible causes will be analysed as part of the annual monitoring process, in collaboration with the relevant stakeholder.”*

Regarding the absence of data at airport level, the NSA reports: *“There has been no change compared to previous years.*

*During 2022 AESA focused on investigating the origin of the lack of data. The delay represented in this indicator is related to IATA code 89 and AESA was able to confirm that the lack of data was due to the fact that these data did not meet the minimum quality required to be considered. PRU sets a minimum threshold on the quality of its data, so if codes ZZZ and 999 exceed 40% of the delay minutes, then the indicator is not published with a numerical value, as it exceeds that minimum threshold set by PRU. Sometimes it happens that the airport operator has no information on the reasons for the delay or it cannot be associated with an IATA code. After several communications with the airport manager, AESA understood that codes ZZZ and 999 are generally assigned when no code has been given (and therefore the cause of the delay is not known) or when the actual delay does not match the declared delay. The indicator picks up the initial declared delay data but this is subject to change and so there are occasions when it does not match the actual delay. This is why there is so much indeterminacy represented by these ZZZ and 999 codes.*

*There does not seem to be a simple resolution to this situation since the data needed to publish the indicator is collected around the middle of the following month and the process of defining the codes that are more in line with reality is done through a post-operational analysis that takes considerably longer.”*



## All causes pre-departure delay

Six Spanish airports are subject to the monitoring of this indicator: Madrid – Barajas, Barcelona, Palma de Mallorca, Málaga, Gran Canaria and Alicante. All of them except Madrid decreased their average departure delay by at least one minute.

Delay in Madrid – Barajas in 2025 was equal to 16.52 min/dep, very close to 2024 value – last year of RP3 – of 16.65 min/dep.

Delay in Barcelona in 2025 decreased to 16.67 min/dep, 12% lower than 2024 value – last year of RP3 – of 18.98 min/dep.

Delay in Palma de Mallorca in 2025 decreased to 20.31 min/dep, 11% lower than 2024 value – last year of RP3 – of 22.89 min/dep. Still, Palma had the third highest delay among airports under RP4 monitoring.

Delay in Málaga in 2025 decreased to 17.48 min/dep, 18% lower than 2024 value – last year of RP3 – of 21.20 min/dep.

Delay in Gran Canaria in 2025 decreased to 14.27 min/dep, 17% lower than 2024 value – last year of RP3 – of 17.22 min/dep.

Delay in Alicante in 2025 decreased to 17.69 min/dep, 7% lower than 2024 value – last year of RP3 – of 19.02 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.

As background information on actual performance, the NSA reports: “2025 values are lower than the 2024 values, despite of the increase in traffic this year.

*However, it should be noted that all-cause departure delay is very generic and ATFM delay is only a small contributor. Departure delay can be generated by ATFM en-route delay (not only local airport, but the complete Network), but also reactionary and turnaround delay, technical issues with the aircraft, airport operations, problems with passengers and/or luggage, etc. In other words, it is not always possible to address a specific reason as this delay is quite generic. Consequently, without a clear focus of the problem to address, it is not feasible to establish measures that can significantly impact the improvement of the indicator, beyond those already mentioned in section 2.2.2.D. PI #4 of this monitoring report.*

*This PI is monitored by AESA. Should any significant deviations be identified, the possible causes will be analysed as part of the annual monitoring process, in collaboration with the relevant stakeholder.”*



## 5 COST-EFFICIENCY - SPAIN

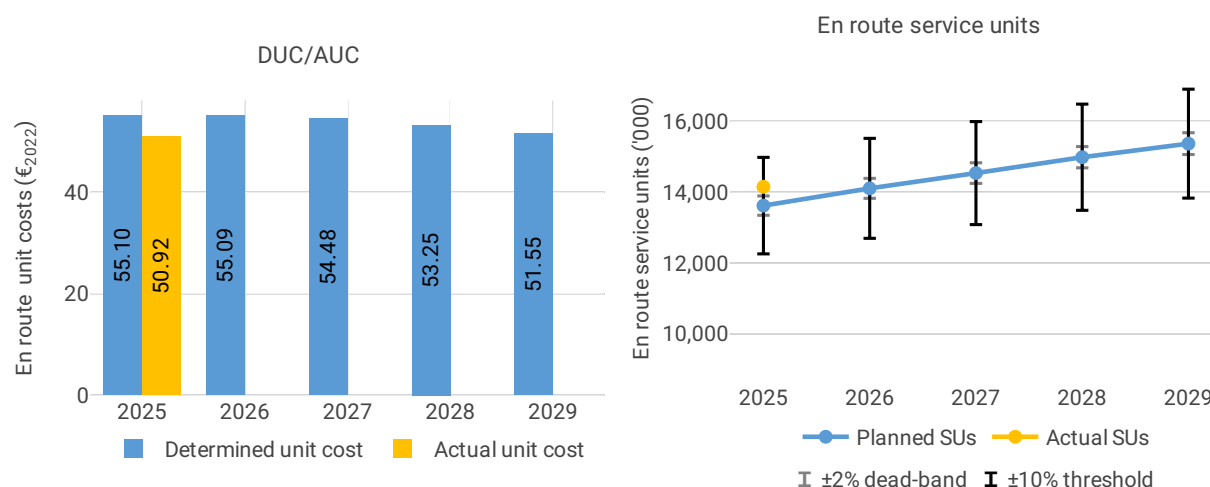
### 5.1 PRB monitoring

- The en route 2025 actual unit cost of Spain Continental was 50.92€2022, -7.6% lower than the determined unit cost (55.10€2022). The en route 2025 actual unit cost of Spain Canarias was 48.65€2022, -7.6% lower than the determined unit cost (52.63€2022). The terminal 2025 actual unit cost of Spain was 100.81€2022, -15.1% lower than the determined unit cost (118.70€2022).
- The en route 2025 actual service units of Spain Continental (14.2M) were +3.9% higher than the determined service units (13.6M). The en route 2025 actual service units of Spain Canarias (2.3M) were +5.1% higher than the determined service units (2.2M).
- The en route 2025 actual total costs of Spain Continental were -29.8M€2022 (-4.0%) lower than determined with all cost categories registering lower-than-planned costs, except cost of capital. This is mainly due to lower staff costs (-22.5M€2022, or -5.1%) and lower other operating costs (-6.2M€2022, or -10.7%) for ENAIRE. According to the NSA, the decrease in staff costs is mainly due to significantly lower-than-planned expenses in “other staff related benefits”. The decrease in other operating costs reflects a more efficient use of resources, resulting in lower spending on services, communications, insurance and energy.
- The en route 2025 actual total costs of Spain Canarias were -3.3M€2022 (-2.8%) lower than determined with all cost categories registering lower-than-planned costs. This is mainly due to lower staff costs for ENAIRE (-1.6M€2022, or -2.5%) and lower depreciation for EA (-1.1M€2022, or -41.8%). The NSA explained that the decrease in staff costs of ENAIRE is mainly due to significantly lower-than-planned expenses in “other staff related benefits”. The decrease in depreciation costs of EA is mainly due to lower investments than planned.
- ENAIRE spent 169.4M€2022 in 2025 related to costs of investments for both en route and terminal charging zones, in line with the determined (169.3M€2022).
- The en route Spain Continental actual unit cost incurred by users in 2025 was 54.76€ (-6.4% below the 2025 DUC), while the en route Spain Canarias actual unit cost incurred by users in 2025 was 45.74€ (-18.3% below the 2025 DUC). The terminal actual unit cost incurred by users in 2025 was 15.77€ (-87.7% below the 2025 DUC). The difference between the AUCU and the DUC for Spain Continental and for the terminal charging zone is mainly driven by other revenues. The difference between the AUCU and the DUC for Spain Canarias is mainly driven by cross-financing.



## 5.2 En route charging zone - Spain Continental

### 5.2.1 Unit cost (KPI#1)

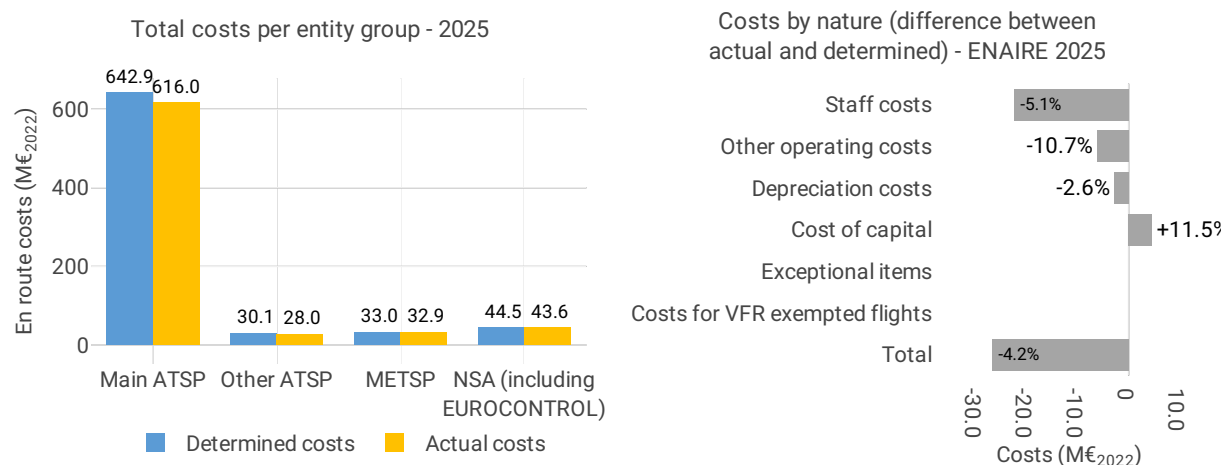


#### Actual and determined data

| Total costs - nominal (M€) | 2025  | 2026  | 2027  | 2028  | 2029  |
|----------------------------|-------|-------|-------|-------|-------|
| Determined costs           | 796.8 | 836.0 | 862.5 | 879.8 | 884.5 |
| Actual costs               | 767.7 | NA    | NA    | NA    | NA    |
| Difference costs           | -29.1 | NA    | NA    | NA    | NA    |

| Inflation assumptions             | 2025  | 2026  | 2027  | 2028  | 2029  |
|-----------------------------------|-------|-------|-------|-------|-------|
| Determined inflation rate         | 2.4%  | 1.9%  | 1.8%  | 1.8%  | 1.8%  |
| Determined inflation index*       | 108.7 | 110.7 | 112.7 | 114.7 | 116.8 |
| Actual inflation rate             | 2.7%  | NA    | NA    | NA    | NA    |
| Actual inflation index*           | 109.3 | NA    | NA    | NA    | NA    |
| Difference inflation index (p.p.) | +0.6  | NA    | NA    | NA    | NA    |

\*100 = 2022



### Focus on unit cost



## AUC vs. DUC

In 2025, the en route AUC was -7.6% (or -4.18 M€2022) lower than the planned DUC. This results from the combination of lower than planned en route costs in real terms (-4.0%, or -29.8 M€2022) and higher than planned TSUs (+3.9%).

### En route service units

The difference between actual and planned TSUs (+3.9%) 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 -4.0% (-29.8 M€2022) lower than planned. This is the result of lower costs for the main ANSP, ENAIRE (-4.2%, or -26.8 M€2022), the other ANSP (EA (Continental)), -7.1%, or -2.1 M€2022), the NSA/EUROCONTROL (-1.9%, or -0.9 M€2022) and the MET service provider (-0.2%, or -0.1 M€2022).

### En route costs for the main ANSP (ENAIRE) at charging zone level

Based on the additional information to the en route reporting tables, the lower than planned en route costs in real terms for ENAIRE in 2025 (-4.2%, or -26.8 M€2022) result from:

- Significantly lower than planned staff costs (-5.1%), mainly resulting from a *“significant decrease in “Other Staff Related Benefits”, due to lower-than-expected allocations to provisions related to the Special Active Reserve (RAE, see below for details) and, to a lesser extent, the Active Reserve (RA)”* (as of the RP4 these provisions are treated as pension costs). This variation was only partly offset by a higher than expected (+2.5%) salary increase approved by the Government, higher ATCO costs due to the implementation of a new unilateral, non consolidated incentive under the *“Summer Plan 2025”*, implemented to address higher than expected traffic levels and increased overtime requirements.
- Significantly lower than planned other operating costs (-10.7%), reflecting a more efficient resource use and lower-than-expected expenditure across several operating categories, including certain professional services, communications, insurance and energy related items.
- Lower than planned depreciation (-2.6%), driven by the later-than-expected entry into service of certain investments.
- Significantly higher than planned cost of capital (+11.5%), driven by higher total asset base and higher average interest rate on debt.

\*According to ENAIRE, the reduction in staff costs associated with the RAE should not be interpreted as an efficiency gain, a cost-saving measure, or a positive deviation from ENAIRE's 2025 planning. It results from the annual actuarial valuation of a long-term employment obligation, performed by an independent external actuarial firm, which led to a reduction in the estimated liability and, consequently, to a reversal of provisions recognised in previous years. Therefore, this decrease does not reflect any operational improvement, management decision, productivity gain, or cost-efficiency measure implemented by ENAIRE during



2025. It is a non-operational accounting adjustment arising from the reassessment of obligations generated in prior years and outside the scope of ENAIRE's annual planning and performance.

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

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

*"The reduction in costs is mainly due to widespread savings across the majority of the entities. In general, there have been decreases across all actual cost categories compared to the determined costs for the year 2025. For further details, please refer to the Additional Information file. The aforementioned savings result in a lower actual unit cost compared to the determined unit cost (DUC) for the year 2025."*

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

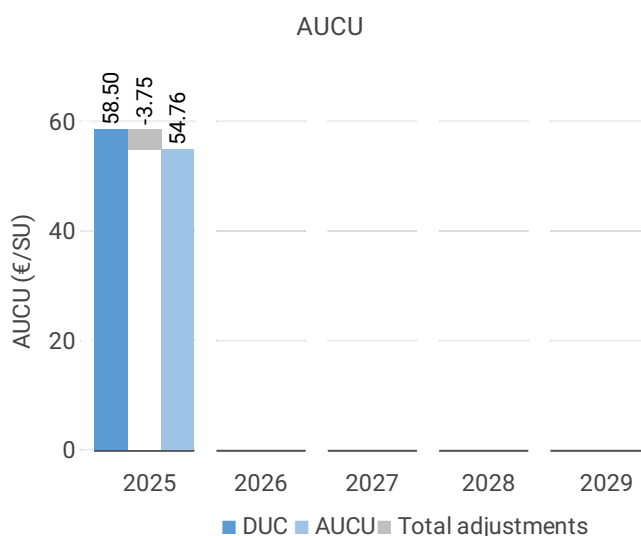
The NSA provides the following explanation for the differences between actual and determined costs in the charging zone:

*"A broad-based cost reduction is observed across all categories, including staff costs. This occurs even though the RP4 National Performance Plan assumed a 2.0% salary increase, and the most recent salary increase approved by the Government amounts to a 2.5% rise for public employees in 2025. However, the overall outcome shows a reduction driven by a significant decrease in other staff-related benefits at the ANSP ENAIRE. This is mainly due to lower-than-planned allocations to provisions related to the Special Active Reserve (RAE), introduced by National Law 26/2022 of 19 December."*

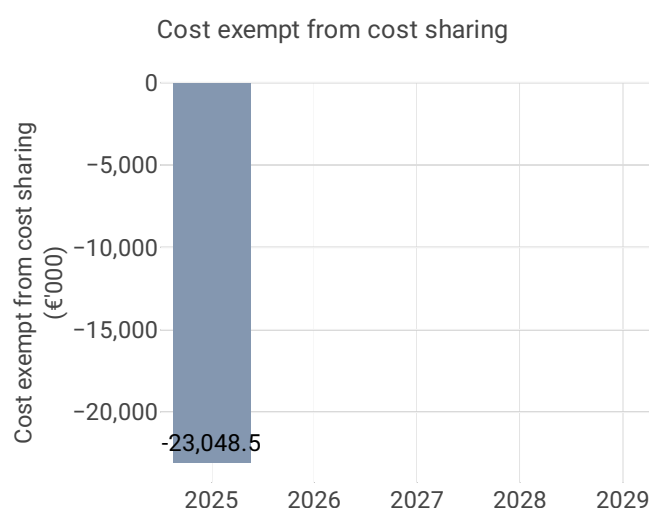
### Recommendations formulated by the NSA to the ANSP (ENAIRE) to rectify the situation and actions taken by the ANSP

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         |
| <b>DUC</b>                         | <b>58.50</b> |
| Inflation adjustment               | 0.23         |
| Cost exempt from cost sharing      | -1.63        |
| Traffic risk sharing adjustment    | -0.64        |
| Traffic adjustment (costs not TRS) | -0.31        |
| Financial incentives               | -0.48        |
| Modulation of charges              | 0.00         |
| Cross-financing                    | 1.00         |
| Other revenues                     | -1.91        |
| Application of lower unit rate     | 0.00         |
| Total adjustments                  | -3.75        |
| <b>AUCU</b>                        | <b>54.76</b> |
| <b>AUCU vs. DUC</b>                | <b>-6.4%</b> |



| Cost exempt from cost sharing – 2025               |                  |              |
|----------------------------------------------------|------------------|--------------|
| Cost exempt from cost sharing by item - 2025       | €'000            | €/SU         |
| New and existing investments                       | -4,556.1         | -0.32        |
| Competent authorities and qualified entities costs | -227.6           | -0.02        |
| Eurocontrol costs                                  | -626.5           | -0.04        |
| Pension costs                                      | -17,638.2        | -1.25        |
| Interest on loans                                  | 0.0              | 0.00         |
| Changes in law                                     | 0.0              | 0.00         |
| <b>Total cost exempt from cost risk sharing</b>    | <b>-23,048.4</b> | <b>-1.63</b> |

## 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 (54.76 €) is -6.4% lower than the nominal DUC (58.50 €). The difference between these two figures (-3.75 €/SU) is due to:



- the positive inflation adjustment resulting from higher than planned inflation (+0.23 €/SU);
- the impact of adjustments resulting from the costs exempted from cost sharing mechanism (-1.63 €/SU);
- the deduction of the traffic risk sharing adjustments (-0.64 €/SU);
- the deduction of the traffic adjustment (-0.31 €/SU) for the costs not subject to traffic risk sharing;
- the impact of financial incentives (-0.48 €/SU);
- cross-financing between Spain Canarias and Spain Continental en route charging zones (+1.00 €/SU); and,
- the deduction of other revenues (-1.91 €/SU).

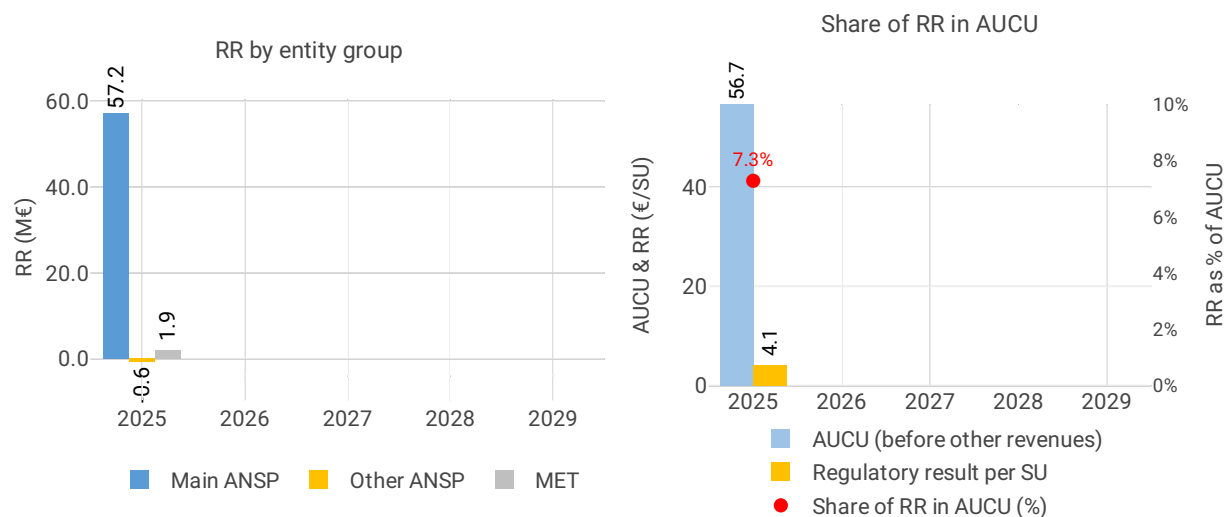
The share of the regulatory result (see next sub-section) in the AUCU (before the deduction of other revenues) is 7.3%.

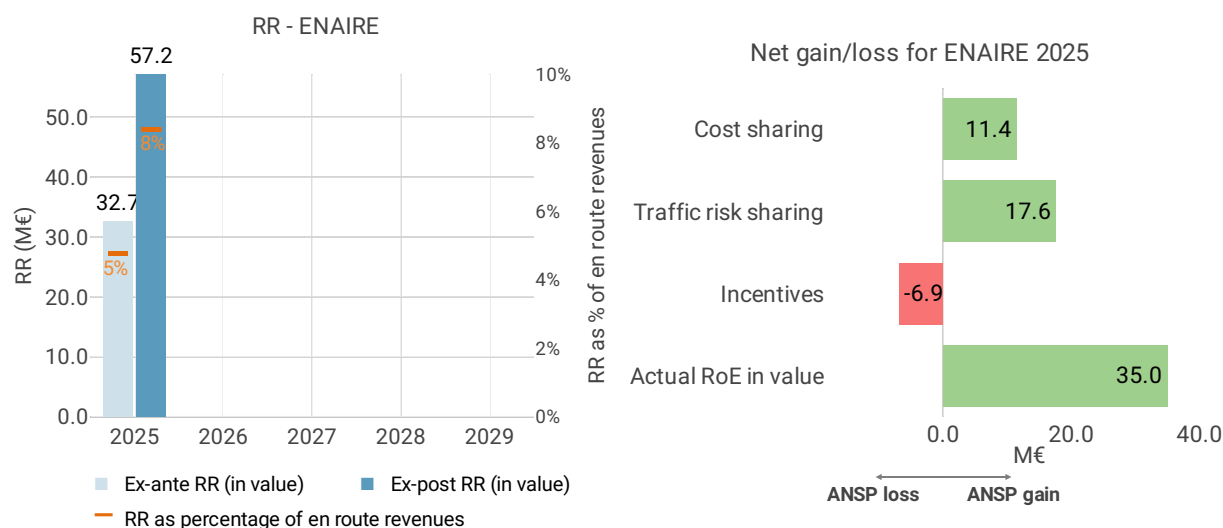
### Initiatives implemented or planned that will improve this PI reported by the NSA

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

*"An annual cost verification is carried out."*

#### 5.2.3 Regulatory result (RR)





## Focus on regulatory result

### ENAIRE net gain/loss on activity in the Spain Continental en route charging zone in 2025

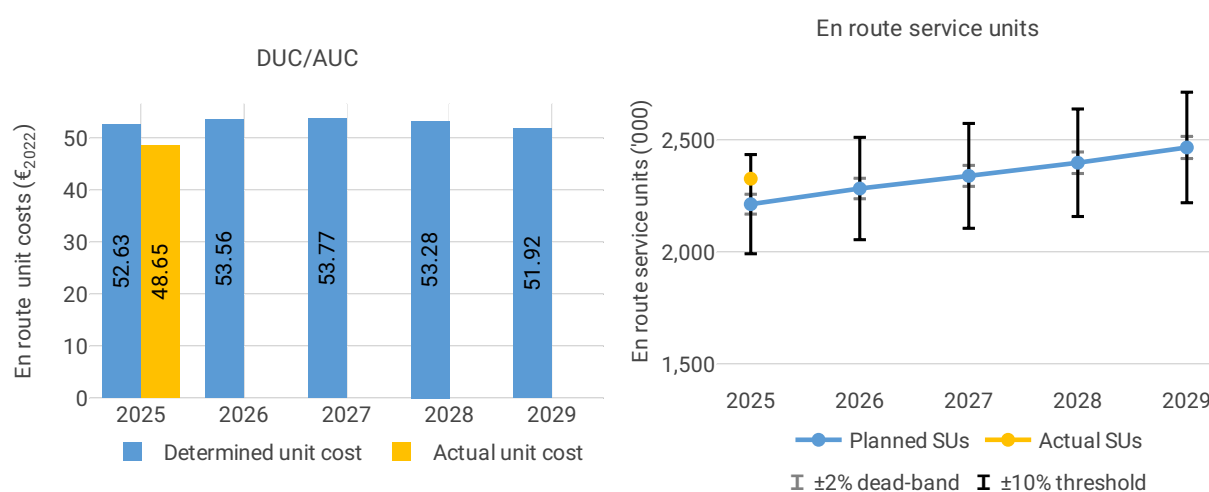
ENAIRE reported a net gain of +22.2 M€, as a combination of a gain of +11.4 M€ arising from the cost sharing mechanism, with a gain of +17.6 M€ arising from the traffic risk sharing mechanism and a loss of -6.9 M€ relating to financial incentives.

### ENAIRE 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 (+22.2 M€) and the actual RoE (+35.0 M€), amounts to +57.2 M€ (8.4% of the en route revenues). The resulting ex-post rate of return on equity is 13.4%, which is higher than the 8.2% planned in the PP.

## 5.3 En route charging zone - Spain Canarias

### 5.3.1 Unit cost (KPI#1)

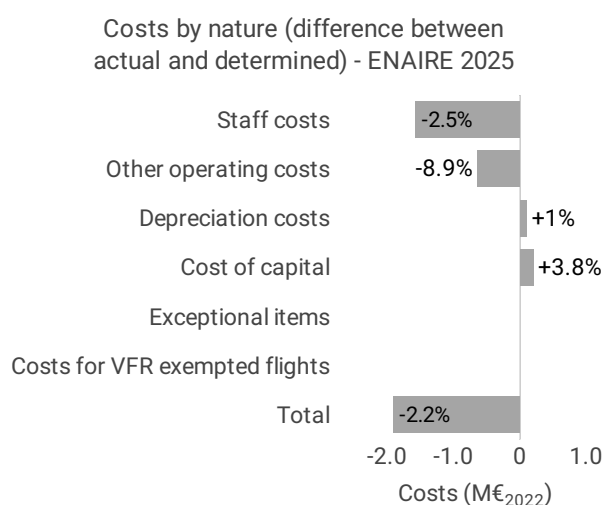
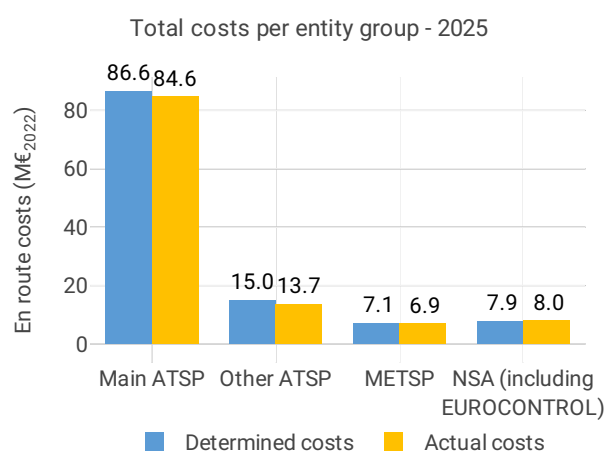


| Actual and determined data |       |       |       |       |       |
|----------------------------|-------|-------|-------|-------|-------|
| Total costs - nominal (M€) | 2025  | 2026  | 2027  | 2028  | 2029  |
| Determined costs           | 124.0 | 131.9 | 137.3 | 141.3 | 143.3 |
| Actual costs               | 121.1 | NA    | NA    | NA    | NA    |
| Difference costs           | -3.0  | NA    | NA    | NA    | NA    |

| Inflation assumptions             | 2025  | 2026  | 2027  | 2028  | 2029  |
|-----------------------------------|-------|-------|-------|-------|-------|
| Determined inflation rate         | 2.4%  | 1.9%  | 1.8%  | 1.8%  | 1.8%  |
| Determined inflation index*       | 108.7 | 110.7 | 112.7 | 114.7 | 116.8 |
| Actual inflation rate             | 2.7%  | NA    | NA    | NA    | NA    |
| Actual inflation index*           | 109.3 | NA    | NA    | NA    | NA    |
| Difference inflation index (p.p.) | +0.6  | NA    | NA    | NA    | NA    |

\*100 = 2022



## Focus on unit cost

### AUC vs. DUC

In 2025, the en route AUC was -7.6% (or -3.98 €2022) lower than the planned DUC. This results from the combination of significantly higher than planned TSUs (+5.1%) and lower than planned en route costs in real terms (-2.8%, or -3.3 M€2022).

### En route service units

The difference between actual and planned TSUs (+5.1%) 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 -2.8% (-3.3 M€2022) lower than planned. This is the result of lower costs for the main ANSP, ENAIRE (-2.2%, or -1.9 M€2022), the other ANSP (EA (Canarias), -8.8%, or -1.3 M€2022) and the MET service provider (-2.8%, or -0.2 M€2022) and higher costs for the NSA/EUROCONTROL (+1.8%, or +0.1 M€2022).



## En route costs for the main ANSP (ENAIRE) at charging zone level

Based on the additional information to the en route reporting tables, the lower than planned en route costs in real terms for ENAIRE in 2025 (-2.2%, or -1.9 M€2022) result from:

- Lower than planned staff costs (-2.5%), mainly resulting from a “*significant decrease in “Other Staff Related Benefits”, due to lower-than-expected allocations to provisions related to the Special Active Reserve (RAE, see below for details) and, to a lesser extent, the Active Reserve (RA)*” (as of the RP4 these provisions are treated as pension costs). This variation was only partly offset by a higher than expected (+2.5%) salary increase approved by the Government, higher ATCO costs due to the implementation of a new unilateral, non-consolidated incentive under the “*Summer Plan 2025*”, implemented to address higher than expected traffic levels and increased overtime requirements.
- Significantly lower than planned other operating costs (-8.9%), reflecting a more efficient resource use and lower-than-expected expenditure across several operating categories, including certain professional services, communications, insurance and energy related items.
- Higher than planned depreciation (+1.0%), explained by earlier than planned entry into service of some investments during 2025.
- Higher than planned cost of capital (+3.8%), driven by higher average interest rate on debt, while the total cost base remained slightly below the determined level.

\*According to ENAIRE, the reduction in staff costs associated with the RAE should not be interpreted as an efficiency gain, a cost-saving measure, or a positive deviation from ENAIRE’s 2025 planning. It results from the annual actuarial valuation of a long-term employment obligation, performed by an independent external actuarial firm, which led to a reduction in the estimated liability and, consequently, to a reversal of provisions recognised in previous years. Therefore, this decrease does not reflect any operational improvement, management decision, productivity gain, or cost-efficiency measure implemented by ENAIRE during 2025. It is a non-operational accounting adjustment arising from the reassessment of obligations generated in prior years and outside the scope of ENAIRE’s annual planning and performance.

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

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

*“The reduction in costs is mainly due to widespread savings across the majority of the entities. In general, there have been decreases across all actual cost categories compared to the determined costs for the year 2025. For further details, please refer to the Additional Information file. The aforementioned savings result in a lower actual unit cost compared to the determined unit cost (DUC) for the year 2025.”*

## 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:

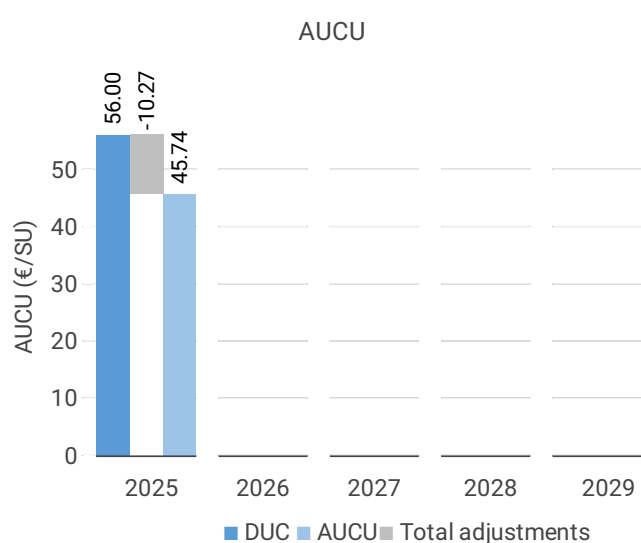


*“A broad-based cost reduction is observed across all categories, including staff costs. This occurs even though the RP4 National Performance Plan assumed a 2.0% salary increase, and the most recent salary increase approved by the Government amounts to a 2.5% rise for public employees in 2025. However, the overall outcome shows a reduction driven by a significant decrease in other staff-related benefits at the ANSP ENAIRE. This is mainly due to lower-than-planned allocations to provisions related to the Special Active Reserve (RAE), introduced by National Law 26/2022 of 19 December.”*

### **Recommendations formulated by the NSA to the ANSP (ENAIRE) to rectify the situation and actions taken by the ANSP**

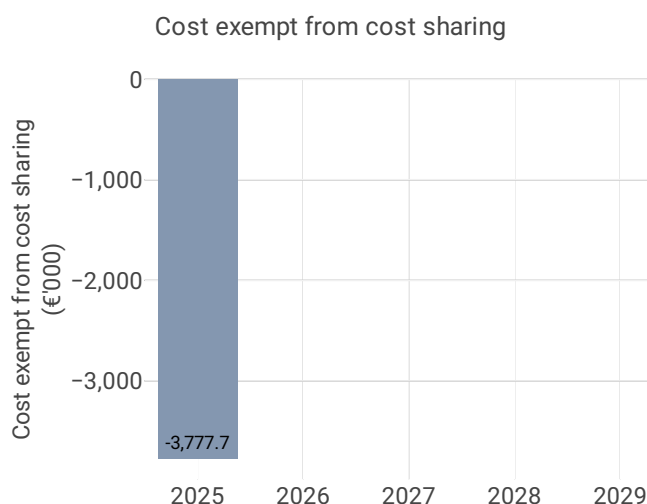
No information was provided in the NSA 2025 Monitoring Report.

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



| AUCU components (€/SU) – 2025      |               |
|------------------------------------|---------------|
| Components of the AUCU in 2025     | €/SU          |
| <b>DUC</b>                         | <b>56.00</b>  |
| Inflation adjustment               | 0.22          |
| Cost exempt from cost sharing      | -1.62         |
| Traffic risk sharing adjustment    | -0.87         |
| Traffic adjustment (costs not TRS) | -0.69         |
| Financial incentives               | -0.40         |
| Modulation of charges              | 0.00          |
| Cross-financing                    | -6.11         |
| Other revenues                     | -0.80         |
| Application of lower unit rate     | 0.00          |
| Total adjustments                  | -10.27        |
| <b>AUCU</b>                        | <b>45.74</b>  |
| <b>AUCU vs. DUC</b>                | <b>-18.3%</b> |





| Cost exempt from cost sharing – 2025               |                 |              |
|----------------------------------------------------|-----------------|--------------|
| Cost exempt from cost sharing by item - 2025       | €'000           | €/SU         |
| New and existing investments                       | -1,531.0        | -0.66        |
| Competent authorities and qualified entities costs | -19.9           | -0.01        |
| Eurocontrol costs                                  | 163.7           | 0.07         |
| Pension costs                                      | -2,390.5        | -1.03        |
| Interest on loans                                  | 0.0             | 0.00         |
| Changes in law                                     | 0.0             | 0.00         |
| <b>Total cost exempt from cost risk sharing</b>    | <b>-3,777.7</b> | <b>-1.62</b> |

## 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 (45.74 €) is -18.3% lower than the nominal DUC (56.00 €). The difference between these two figures (-10.27 €/SU) is due to:

- the positive inflation adjustment resulting from higher than planned inflation (+0.22 €/SU);
- the impact of adjustments resulting from the costs exempted from cost sharing mechanism (-1.62 €/SU);
- the deduction of the traffic risk sharing adjustments (-0.87 €/SU);
- the deduction of the traffic adjustment (-0.69 €/SU) for the costs not subject to traffic risk sharing;
- the impact of financial incentives (-0.40 €/SU);
- cross-financing between Spain Continental and Spain Canarias en route charging zones (-6.11 €/SU); and,
- the deduction of other revenues (-0.80 €/SU).

The share of the regulatory result (see next sub-section) in the AUCU (before the deduction of other revenues) is 6.2%.

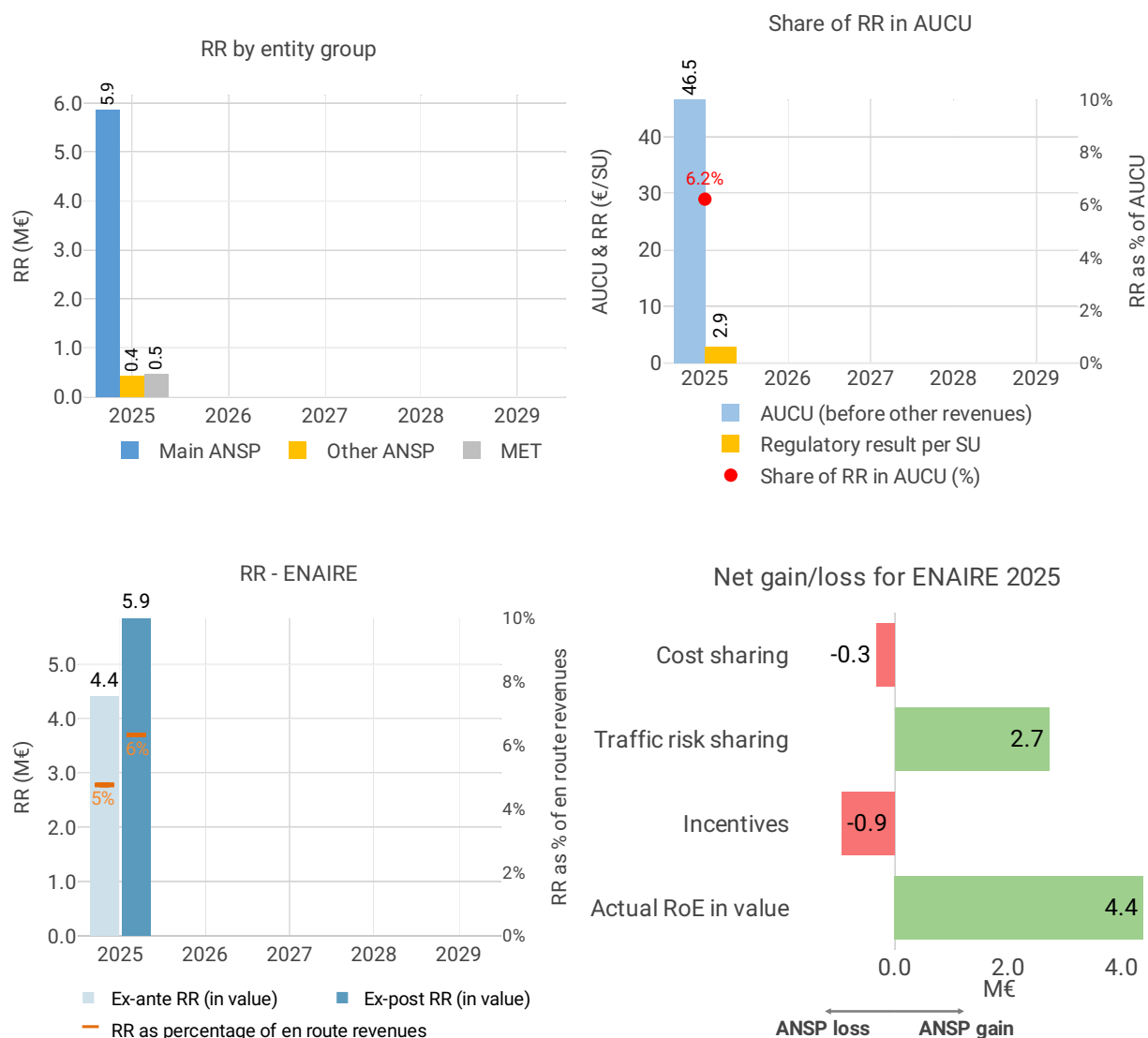


## Initiatives implemented or planned that will improve this PI reported by the NSA

The NSA provides the following information regarding the initiatives:

*“An annual cost verification is carried out.”*

### 5.3.3 Regulatory result (RR)



## Focus on regulatory result

### ENAIRE net gain/loss on activity in the Spain Canarias en route charging zone in 2025

ENAIRE reported a net gain of +1.5 M€, as a combination of a loss of -0.3 M€ arising from the cost sharing mechanism, with a gain of +2.7 M€ arising from the traffic risk sharing mechanism and a loss of -0.9 M€ relating to financial incentives.

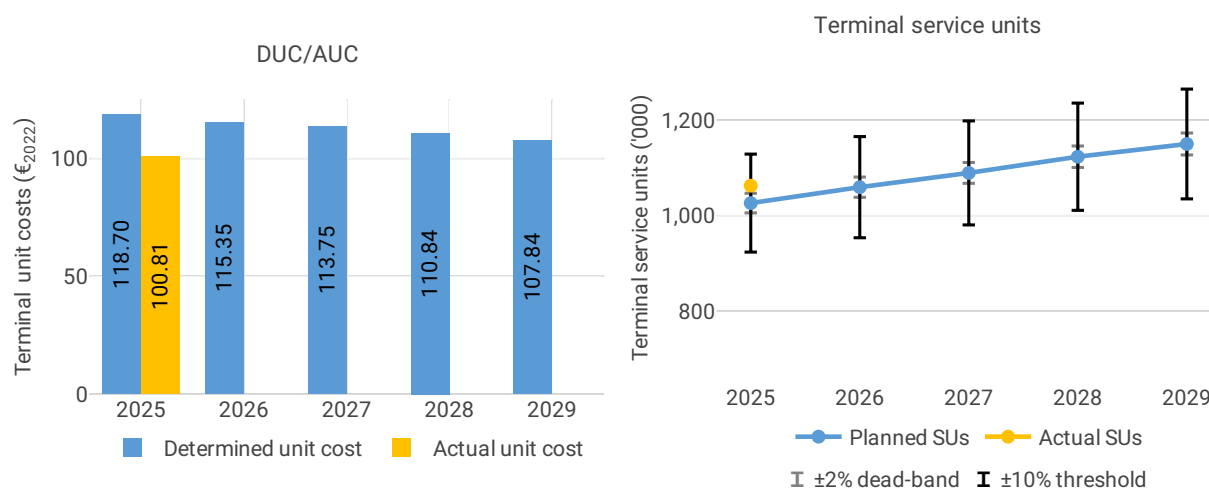


## ENAIRE overall regulatory result (RR) for the en route activity

Ex-post, the overall RR, taking into account the net gain from the en route activity mentioned above (+1.5 M€) and the actual RoE (+4.4 M€), amounts to +5.9 M€ (6.3% of the en route revenues). The resulting ex-post rate of return on equity is 10.9%, which is higher than the 8.2% planned in the PP.

### 5.4 Terminal charging zone

#### 5.4.1 Unit cost (KPI#1)



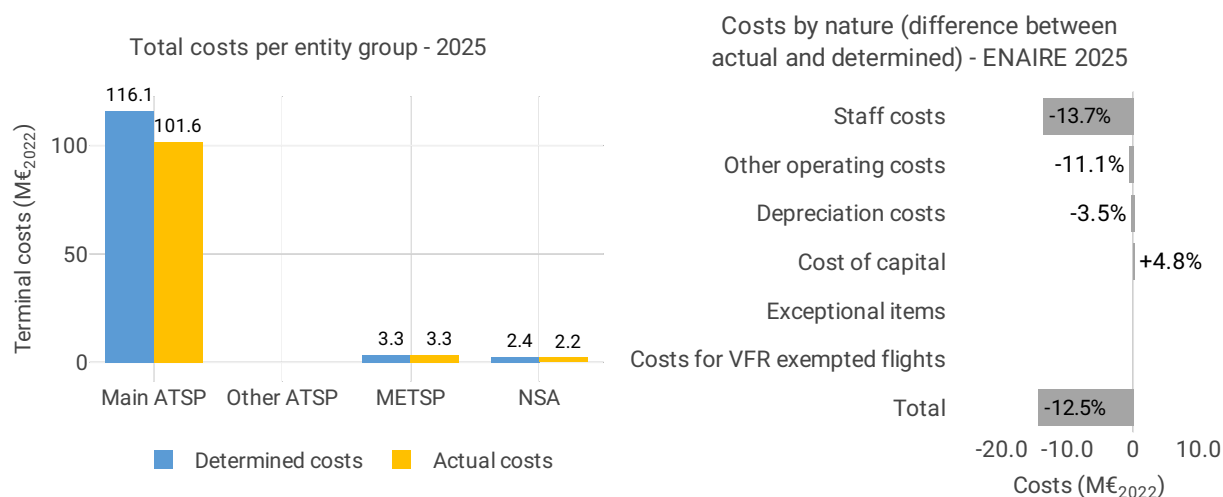
| Actual and determined data |       |       |       |       |       |
|----------------------------|-------|-------|-------|-------|-------|
| Total costs - nominal (M€) | 2025  | 2026  | 2027  | 2028  | 2029  |
| Determined costs           | 131.2 | 133.8 | 137.7 | 140.6 | 142.2 |
| Actual costs               | 115.8 | NA    | NA    | NA    | NA    |
| Difference costs           | -15.4 | NA    | NA    | NA    | NA    |

| Inflation assumptions             | 2025  | 2026  | 2027  | 2028  | 2029  |
|-----------------------------------|-------|-------|-------|-------|-------|
| Determined inflation rate         | 2.4%  | 1.9%  | 1.8%  | 1.8%  | 1.8%  |
| Determined inflation index*       | 108.7 | 110.7 | 112.7 | 114.7 | 116.8 |
| Actual inflation rate             | 2.7%  | NA    | NA    | NA    | NA    |
| Actual inflation index*           | 109.3 | NA    | NA    | NA    | NA    |
| Difference inflation index (p.p.) | +0.6  | NA    | NA    | NA    | NA    |

\*100 = 2022





## Focus on unit cost

### AUC vs. DUC

In 2025, the terminal AUC was -15.1% (or -17.89 €2022) lower than the planned DUC. This results from the combination of significantly lower than planned terminal costs in real terms (-12.1%, or -14.7 M€2022) and higher than planned TNSUs (+3.6%).

### Terminal service units

The difference between actual and planned TNSUs (+3.6%) 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 terminal revenues is therefore shared between the ANSP and the airspace users (see the main ANSP regulatory result).

### Terminal costs by entity

Actual real terminal costs are -12.1% (-14.7 M€2022) lower than planned. This is the result of lower costs for the main ANSP, ENAIRE (-12.5%, or -14.5 M€2022), the NSA (-6.3%, or -0.1 M€2022) and the MET service provider (-0.9%, or -0.03 M€2022).

### Terminal costs for the main ANSP (ENAIRE) 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 ENAIRE in 2025 (-12.5%, or -14.5 M€2022) result from:

- Significantly lower than planned staff costs (-13.7%), driven by “*significant decrease in “Other Staff Related Benefits”, due to lower-than-expected allocations to provisions related to the Special Active Reserve (RAE, see below for details) and, to a lesser extent, the Active Reserve (RA)*” (as of RP4 these provisions are treated as pension costs).
- Significantly lower than planned other operating costs (-11.1%), in particular for professional services, communications, insurance and energy-related items.
- Lower than planned depreciation (-3.5%), explained by the timing of investments entering into service and the resulting evolution of the depreciable asset base.
- Higher than planned cost of capital (+4.8%), mainly driven by higher average interest on debt while the total asset base remained slightly below the determined level.



\*According to ENAIRE, the reduction in staff costs associated with the RAE should not be interpreted as an efficiency gain, a cost-saving measure, or a positive deviation from ENAIRE's 2025 planning. It results from the annual actuarial valuation of a long-term employment obligation, performed by an independent external actuarial firm, which led to a reduction in the estimated liability and, consequently, to a reversal of provisions recognised in previous years. Therefore, this decrease does not reflect any operational improvement, management decision, productivity gain, or cost-efficiency measure implemented by ENAIRE during 2025. It is a non-operational accounting adjustment arising from the reassessment of obligations generated in prior years and outside the scope of ENAIRE's annual planning and performance.

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

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

*"The reduction in costs is mainly due to widespread savings across the majority of the entities. In general, there have been decreases across all actual cost categories compared to the determined costs for the year 2025. For further details, please refer to the Additional Information file.*

*The aforementioned savings result in a lower actual unit cost compared to the determined unit cost (DUC) for the year 2025."*

### **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:

*"A broad-based cost reduction is observed across all categories, including staff costs. This occurs even though the RP4 National Performance Plan assumed a 2.0% salary increase, and the most recent salary increase approved by the Government amounts to a 2.5% rise for public employees in 2025.*

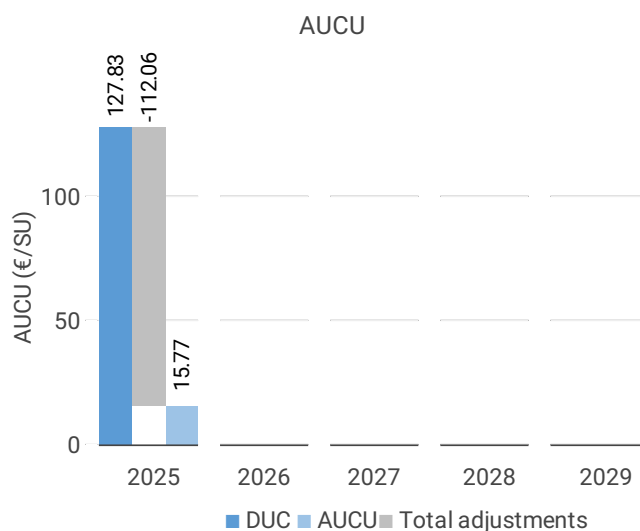
*However, the overall outcome shows a reduction driven by a significant decrease in other staff-related benefits at the ANSP ENAIRE. This is mainly due to lower-than-planned allocations to provisions related to the Special Active Reserve (RAE), introduced by National Law 26/2022 of 19 December."*

### **Recommendations formulated by the NSA to the ANSP (ENAIRE) to rectify the situation and actions taken by the ANSP**

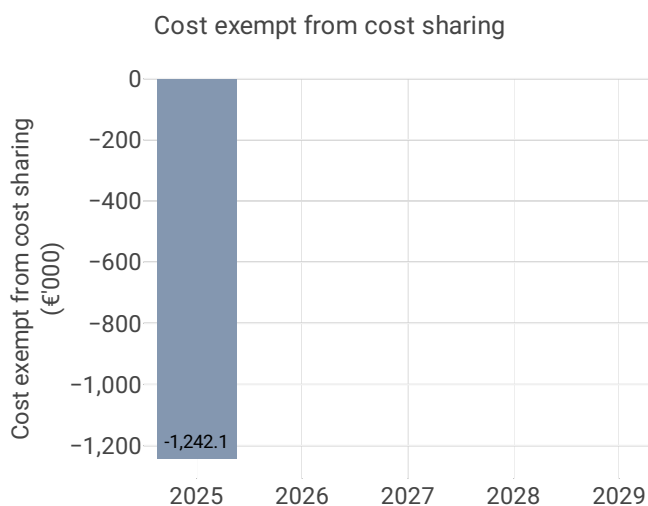
No information was provided in the NSA 2025 Monitoring Report.



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



| AUCU components (€/SU) – 2025      |               |
|------------------------------------|---------------|
| Components of the AUCU in 2025     | €/SU          |
| <b>DUC</b>                         | <b>127.83</b> |
| Inflation adjustment               | 0.61          |
| Cost exempt from cost sharing      | -1.17         |
| Traffic risk sharing adjustment    | -1.29         |
| Traffic adjustment (costs not TRS) | -0.20         |
| Financial incentives               | 0.00          |
| Modulation of charges              | 0.00          |
| Cross-financing                    | 0.00          |
| Other revenues                     | -76.68        |
| Application of lower unit rate     | -33.34        |
| Total adjustments                  | -112.06       |
| <b>AUCU</b>                        | <b>15.77</b>  |
| <b>AUCU vs. DUC</b>                | <b>-87.7%</b> |



| Cost exempt from cost sharing – 2025               |                 |              |
|----------------------------------------------------|-----------------|--------------|
| Cost exempt from cost sharing by item - 2025       | €'000           | €/SU         |
| New and existing investments                       | -302.5          | -0.28        |
| Competent authorities and qualified entities costs | -148.7          | -0.14        |
| Eurocontrol costs                                  | 0.0             | 0.00         |
| Pension costs                                      | -790.9          | -0.74        |
| Interest on loans                                  | 0.0             | 0.00         |
| Changes in law                                     | 0.0             | 0.00         |
| <b>Total cost exempt from cost risk sharing</b>    | <b>-1,242.1</b> | <b>-1.17</b> |

## 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 (15.77 €) is -87.7% lower than the nominal DUC (127.83 €) (see Note 1 below regarding the calculation of AUCU for Spain TCZ). The difference between these two figures (-112.06 €/SU) is due to:

- the deduction of other revenues (-76.68 €/SU) corresponding to the amount received by ENAIRE through the contract with the airport operator (Aena) for aerodrome services;
- the positive inflation adjustment resulting from higher than planned inflation (+0.61 €/SU);
- the impact of adjustments resulting from the costs exempted from cost sharing mechanism (-1.17 €/SU);
- the deduction of the traffic risk sharing adjustments (-1.29 €/SU);
- the deduction of the traffic adjustment (-0.20 €/SU) for the costs not subject to traffic risk sharing; and,
- the application of a lower unit rate as foreseen in Art. 29(6) in year 2025 (-33.34 €/SU).

The share of the regulatory result (see next sub-section) in the AUCU (before the deduction of other revenues) is 20.6% (see Note 2 below).

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

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

*“An annual cost verification is carried out.”*

#### Note 1

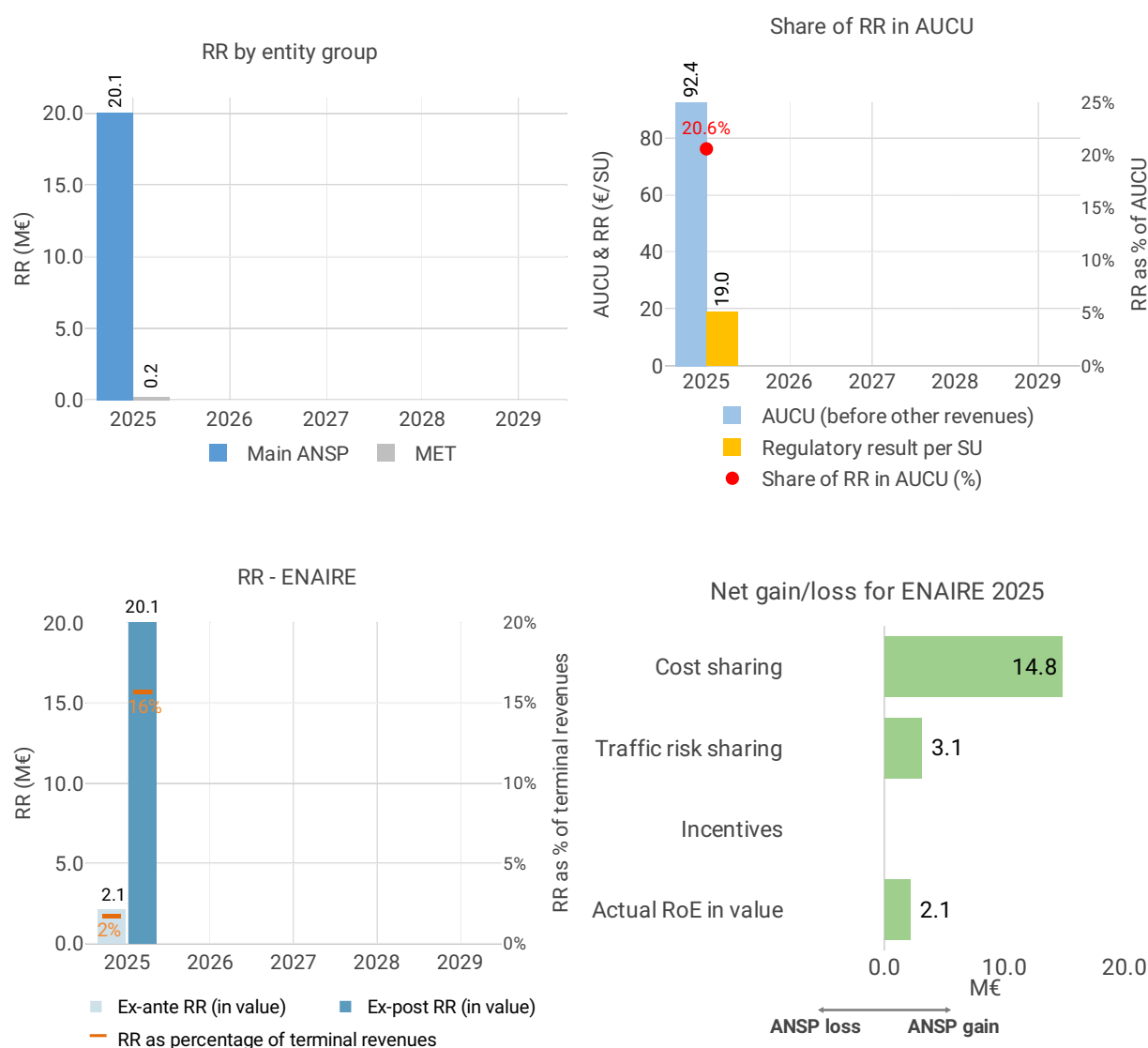
Spain (specifically ENAIRE) only charges a portion of terminal determined costs (approximately 20%) to the airspace users through terminal navigation charges, while the rest is financed through the income relating to contractual arrangement between ENAIRE and the airport operator Aena (disclosed under Other revenues). This should be considered when interpreting the analysis above.

Furthermore, as is the case for all charging zones, the AUCU and, in particular, its components (adjustments related to 2025 activity) disclosed for the Spanish terminal charging



zone here are derived using the data reported in Table T2A. However, Spain (specifically ENAIRE) only carries forward a portion of calculated adjustments into the terminal unit rate (approximately 20%, which are attributable to the "*final approach determined costs*"). Due to this specificity, the components of AUCU presented here do not represent the adjustments actually carried forward into future unit rates.

### 5.4.3 Regulatory result (RR)



## Focus on regulatory result

### ENAIRE net gain/loss on activity in the Spain terminal charging zone in 2025

ENAIRE reported a net gain of +17.9 M€, as a combination of a gain of +14.8 M€ arising from the cost sharing mechanism, with a gain of +3.1 M€ arising from the traffic risk sharing mechanism. See also Note 1 below.

### ENAIRE 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 (+17.9 M€) and the actual RoE (+2.1 M€), amounts to +20.1 M€ (15.7% of the terminal



revenues). The resulting ex-post rate of return on equity is 76.6%, which is much higher than the 8.2% planned in the PP. See also Notes 1 and 2 below.

**Note 1**

ENAIRE only charges a portion of terminal determined costs (approximately 20%) to the airspace users through terminal navigation charges, while the rest is financed through the income relating to contractual arrangement between ENAIRE and the airport operator Aena.

Furthermore, as is the case for all charging zones, the gain/loss in respect to ENAIRE activity in the Spanish terminal charging zone in 2025 is derived using the data reported in Table T2A. However, ENAIRE only retains a portion of this calculated result (approximately 20%, which is attributable to the "*final approach determined costs*").

For these reasons, the gain/loss on activity in 2025 as well as RR presented here for ENAIRE should be interpreted with caution.

**Note 2**

The ex-post RR does not take into account the application of a lower unit rate in 2025 as per Art. 29.6 (the loss in revenues corresponds to -35.4 M€ for 2025).

