



Performance Review Body Monitoring Report

Switzerland - 2021

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TABLE OF CONTENTS

1	OVERVIEW	3
1.1	Contextual information	3
1.2	Traffic (En route traffic zone)	3
1.3	Safety (Main ANSP)	4
1.4	Environment (Member State)	4
1.5	Capacity (Member State)	5
1.6	Cost-efficiency (En route/Terminal charging zone(s))	6
2	SAFETY - SWITZERLAND	6
2.1	PRB monitoring	6
2.2	Effectiveness of Safety Management (EoSM) (KPI#1)	7
2.3	Safety occurrences	7
2.4	Use of automated safety data recording system (ASDRS) (PI#3)	8
3	ENVIRONMENT - SWITZERLAND	8
3.1	PRB monitoring	8
3.2	En route performance	9
3.3	Terminal performance	10
3.4	Civil-Military dimension	11
4	CAPACITY - SWITZERLAND	12
4.1	PRB monitoring	12
4.2	En route performance	13
4.3	Terminal performance	14
5	COST-EFFICIENCY - SWITZERLAND	16
5.1	PRB monitoring	16
5.2	En route charging zone	16
5.3	Terminal charging zone	19

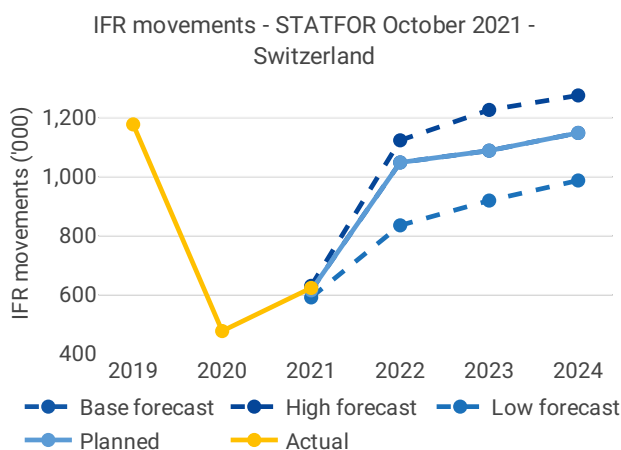
1 OVERVIEW

1.1 Contextual information

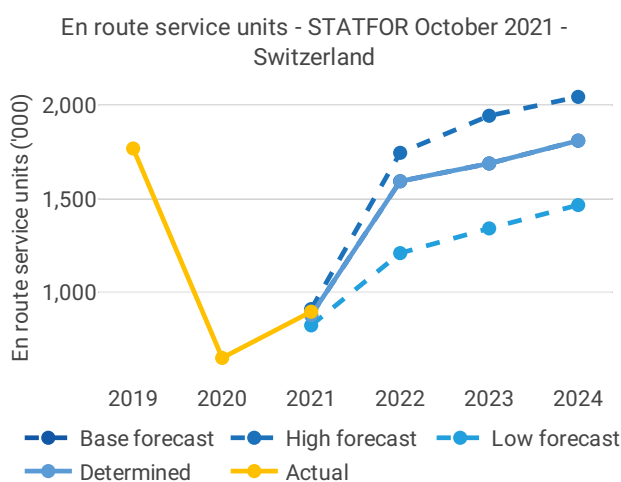
National performance plan adopted following Commission Decision (EU) 2023/178 of 14 December 2022

List of ACCs 2 Geneva ACC Zurich ACC	Exchange rate (1 EUR=) 2017: 1.11124 CHF 2021: 1.08084 CHF	Main ANSP • Skyguide
No of airports in the scope of the performance plan: • ≥80'K 2 • <80'K 0	Share of Union-wide: • traffic (TSUs) 2021 1.3% • en route costs 2021 2.7% Share en route / terminal costs 2021 63% / 37%	Other ANSPs —
	En route charging zone(s) Switzerland Terminal charging zone(s) Switzerland	MET Providers • Office Fédéral de la Météorologie et de Climatologie MétéoSuisse

1.2 Traffic (En route traffic zone)



- Switzerland recorded 623K actual IFR movements in 2021, +31% compared to 2020 (477K).
- Actual 2021 IFR movements were +1.3% above the plan (615K).
- Actual 2021 IFR movements represent 53% of the actual 2019 level (1,177K).



- Switzerland recorded 897K actual en route service units in 2021, +38% compared to 2020 (650K).
- Actual 2021 service units were +2.1% above the plan (879K).
- Actual 2021 service units represent 65% of the actual 2019 level (1,769K).

1.3 Safety (Main ANSP)

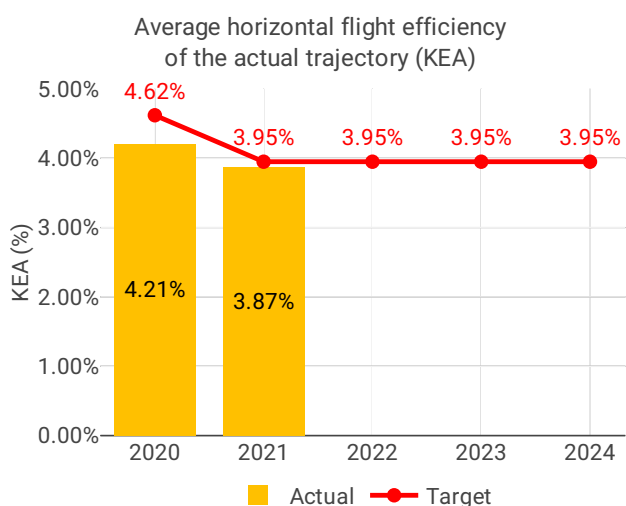


- Skyguide achieved the RP3 EoSM targets in all management objectives, except in safety risk management which is however aligned to the plan. In 2021, the NSA reviewed Skyguide safety management function and concluded that the ANSP is expected to achieve the EoSM targets toward the end of RP3. Skyguide implemented specific measures in all safety management areas to maintain safety performance.

- Switzerland recorded a lower rate of runway incursions, but a high rate of separation minima infringements in 2021 relative to 2020. Both rates are below the Union-wide average rates.

- Skyguide should improve its safety management by implementing automated safety data recording systems for runway incursions.

1.4 Environment (Member State)



- Switzerland achieved a KEA performance of 3.87% compared to its target of 3.95% and contributed positively towards achieving the Union-wide target. KEA improved by 0.34 p.p. compared to 2020.

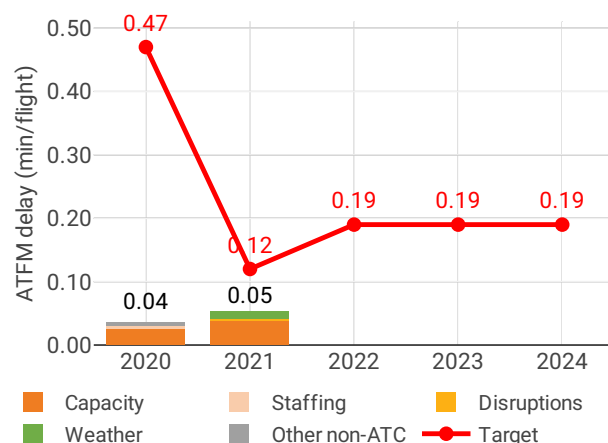
- Both SCR and KEP improved in 2021 by 5% and 6% respectively.

- The share of CDO flights remained at similar levels to 2020.

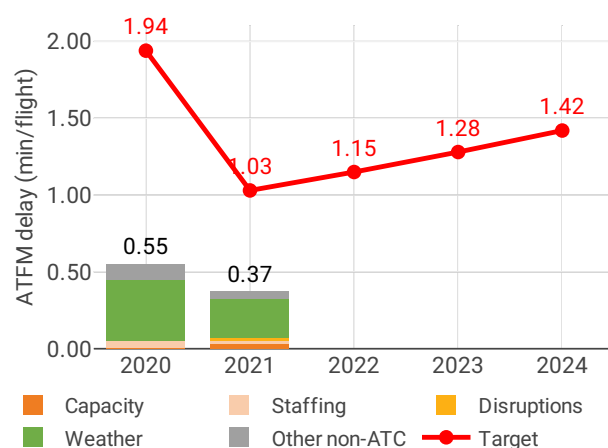
- Both additional time in terminal airspace and additional taxi out time improved in comparison to 2020 by 14% and 11% respectively.

1.5 Capacity (Member State)

Average en route ATFM delay per flight by delay groups



Average arrival ATFM delay per flight by delay groups



compared to 2020. Sector opening hours are 28.9% below 2019 levels. The yearly total of sector opening hours in Zurich ACC was 23,041, showing an 8.8% increase compared to 2020. Sector opening hours are 35.1% below 2019 levels.

- Geneva ACC registered 15.43 IFR movements per one sector opening hour in 2021, being 26.8% below 2019 levels. Zurich ACC registered 18.65 IFR movements per one sector opening hour in 2021, being 19.5% below 2019 levels.

- Switzerland registered 0.08 minutes of average en route ATFM delay per flight during 2021, thus meeting the local breakdown value of 0.12. Geneva ACC accumulated 0.03 minutes of en route delay which was below the ACC reference value of 0.10 and Zurich ACC accumulated 0.09 minutes of delay which was also below the ACC reference value of 0.10.

- Delays should be considered in the context of lower traffic: in Switzerland, IFR movements in 2021 were 47% lower than in 2019.

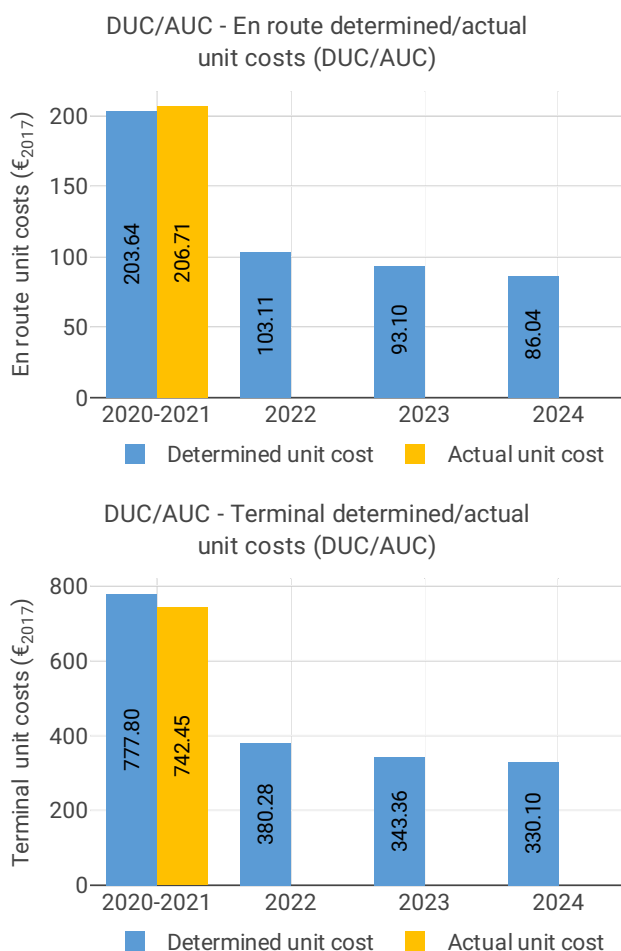
- Traffic is expected to grow, with 2019 levels likely being reached in 2023 in high growth scenario or 2024 in the base growth scenario. The number of ATCOs in OPS is planned to be reduced slightly in both ACCs during RP3.

- Delays were highest in February and March and between June and October, mostly due to ATC Capacity issues and adverse weather conditions.

- The share of delayed flights with delays longer than 15 minutes in Switzerland decreased by 2.5 p.p. compared to 2020 and was lower than 2019 values.

- The yearly total of sector opening hours in Geneva ACC was 22,971, showing an 8.9% increase

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



- The en route 2020/2021 actual unit cost of Switzerland was 206.71 €2017, +1.5% higher than the determined unit cost (203.64 €2017). The terminal 2020/2021 actual unit cost was 742.45 €2017, -4.5% lower than the determined unit cost (777.80 €2017).

- The en route 2021 actual service units (897K) were +2.1% higher than determined (879K).

- In 2021, Switzerland decreased total costs by -12 M€2017 (-7.3%) compared to determined costs. The decrease was mainly driven by a decrease in staff costs (-23 M€2017, or -18%), due to a provision on retirement age expected for 2021 but now postponed to 2022.

- However, the decrease in several cost categories is not transparent as it includes the non-invoicing of the financing of the delegated airspace, that was initially determined as negative exceptional items. In this regards, Switzerland should improve clarity in the reporting.

- Skyguide spent 43 M€2017 in 2021 related to costs of investments, in line with the determined.

- The en route actual unit cost incurred by users in 2020/2021 was 212.38€, while the terminal actual unit cost incurred by users was 814.95€.

2 SAFETY - SWITZERLAND

2.1 PRB monitoring

- Skyguide achieved the RP3 EoS targets in all management objectives, except in safety risk management which is however aligned to the plan. In 2021, the NSA reviewed Skyguide safety management function and concluded that the ANSP is expected to achieve the EoS targets toward the end of RP3. Skyguide implemented specific measures in all safety management areas to maintain safety performance.

- Switzerland recorded a lower rate of runway incursions, but a high rate of separation minima infringements in 2021 relative to 2020. Both rates are below the Union-wide average rates.

- Skyguide should improve its safety management by implementing automated safety data recording systems for runway incursions.

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



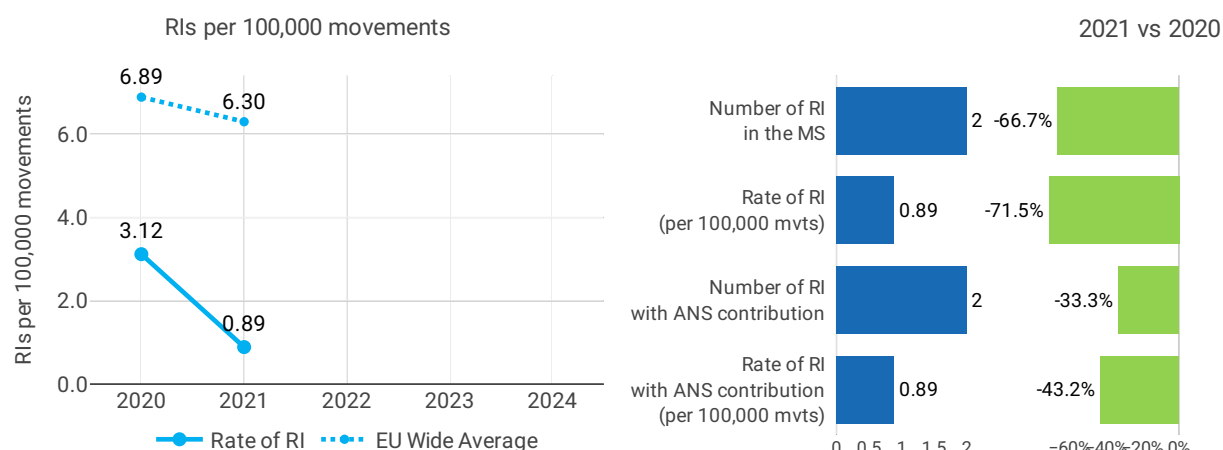
Focus on EoSM

Maturity levels have been maintained with respect to 2020. Four out of five EoSM components of the ANSP meet already the 2024 target level. Only the component “Safety Risk Management” is below 2024 target level, at level C. Improvements in safety risk management are still expected during RP3 to achieve 2024 targets.

Detailed information on Safety performance monitoring for the year 2021 are included in Performance Review Body Monitoring Report 2021, Annex III – Safety report

2.3 Safety occurrences

2.3.1 Rate of runway incursions (RIs) (PI#1)



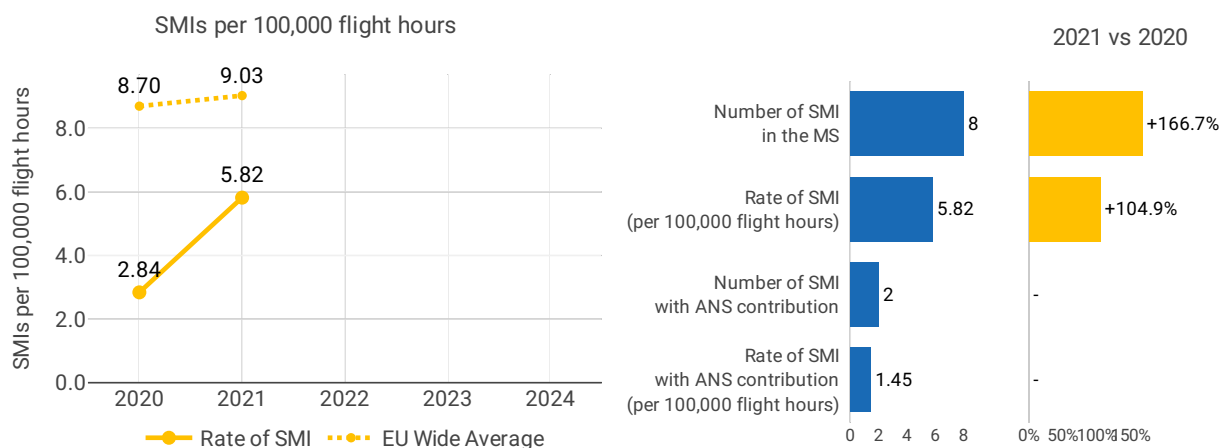
Rate of RIs per 100,000 airport movements - Switzerland

#	Airport name	APT movements	Number of RI	Rate RI per 100,000
1	Zürich	125,742	0	0.00
2	Geneva	99,679	2	2.01

Focus on runway incursions

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2.3.2 Rate of separation minima infringements (SMIs) (PI#2)



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

#	ANSP	Flight hours					Number of SMIs				
		2020	2021	2022	2023	2024	2020	2021	2022	2023	2024
1	SKYGUIDE	150,242	137,471	NA	NA	NA	0	2	NA	NA	NA

#	ANSP	Rate of SMI per 100,000 flight hours					% variation in rate of SMIs				
		2020	2021	2022	2023	2024	2020	2021	2022	2023	2024
1	SKYGUIDE	0.0	5.8	NA	NA	NA	NA	0%	NA	NA	NA

Focus on separation minima

Detailed information on Safety performance monitoring for the year 2021 are included in Performance Review Body Monitoring Report 2021, Annex III – Safety report

2.3.3 Quality of occurrences reporting

Detailed information on Safety performance monitoring for the year 2021 are included in Performance Review Body Monitoring Report 2021, Annex III – Safety report

2.4 Use of automated safety data recording system (ASDRS) (PI#3)

2021	
For RIs	For SMIs
X	✓

Detailed information on Safety performance monitoring for the year 2021 are included in Performance Review Body Monitoring Report 2021, Annex III – Safety report

3 ENVIRONMENT - SWITZERLAND

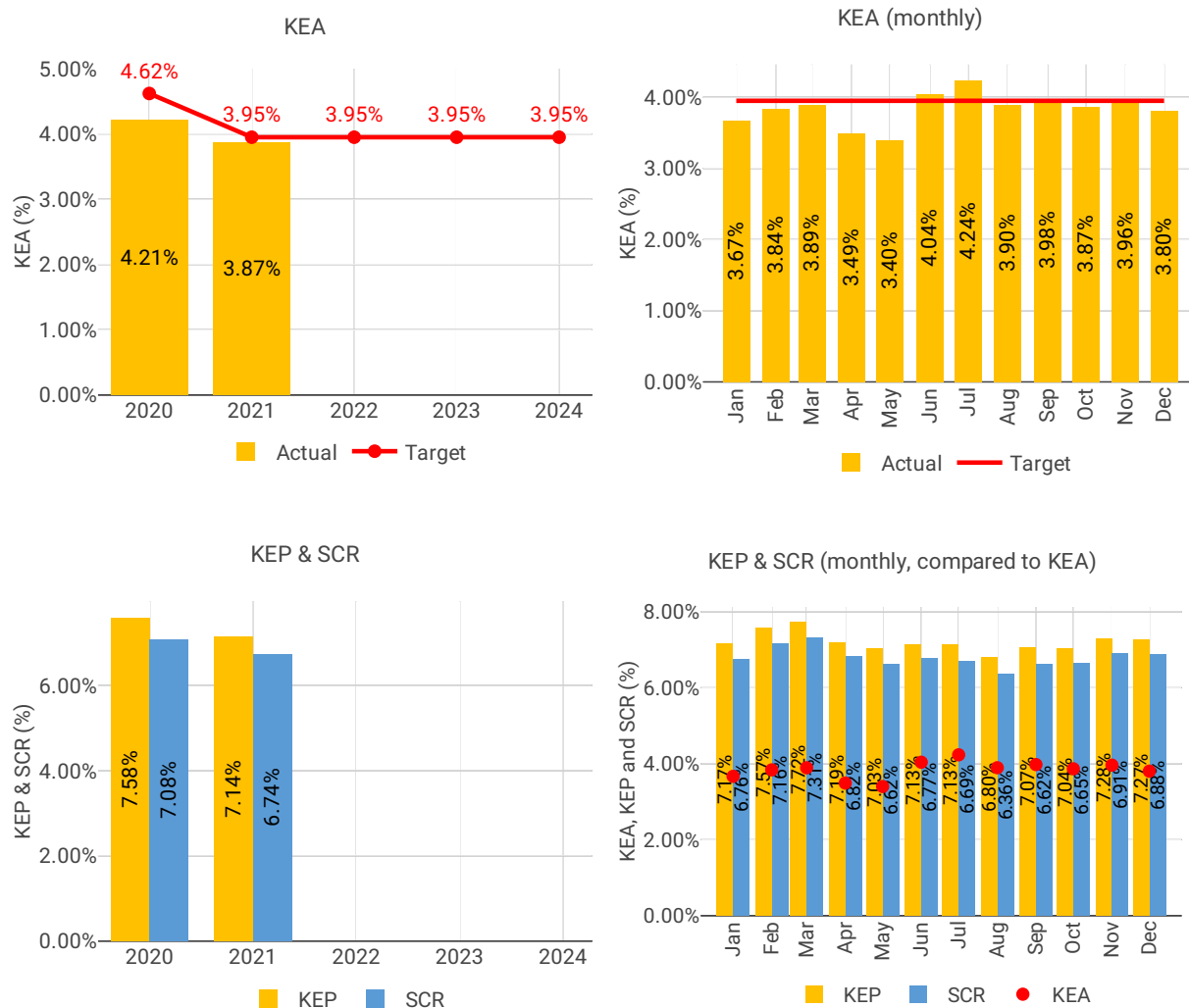
3.1 PRB monitoring

- Switzerland achieved a KEA performance of 3.87% compared to its target of 3.95% and contributed positively towards achieving the Union-wide target. KEA improved by 0.34 p.p. compared to 2020.

- Both SCR and KEP improved in 2021 by 5% and 6% respectively.
- The share of CDO flights remained at similar levels to 2020.
- Both additional time in terminal airspace and additional taxi out time improved in comparison to 2020 by 14% and 11% respectively.

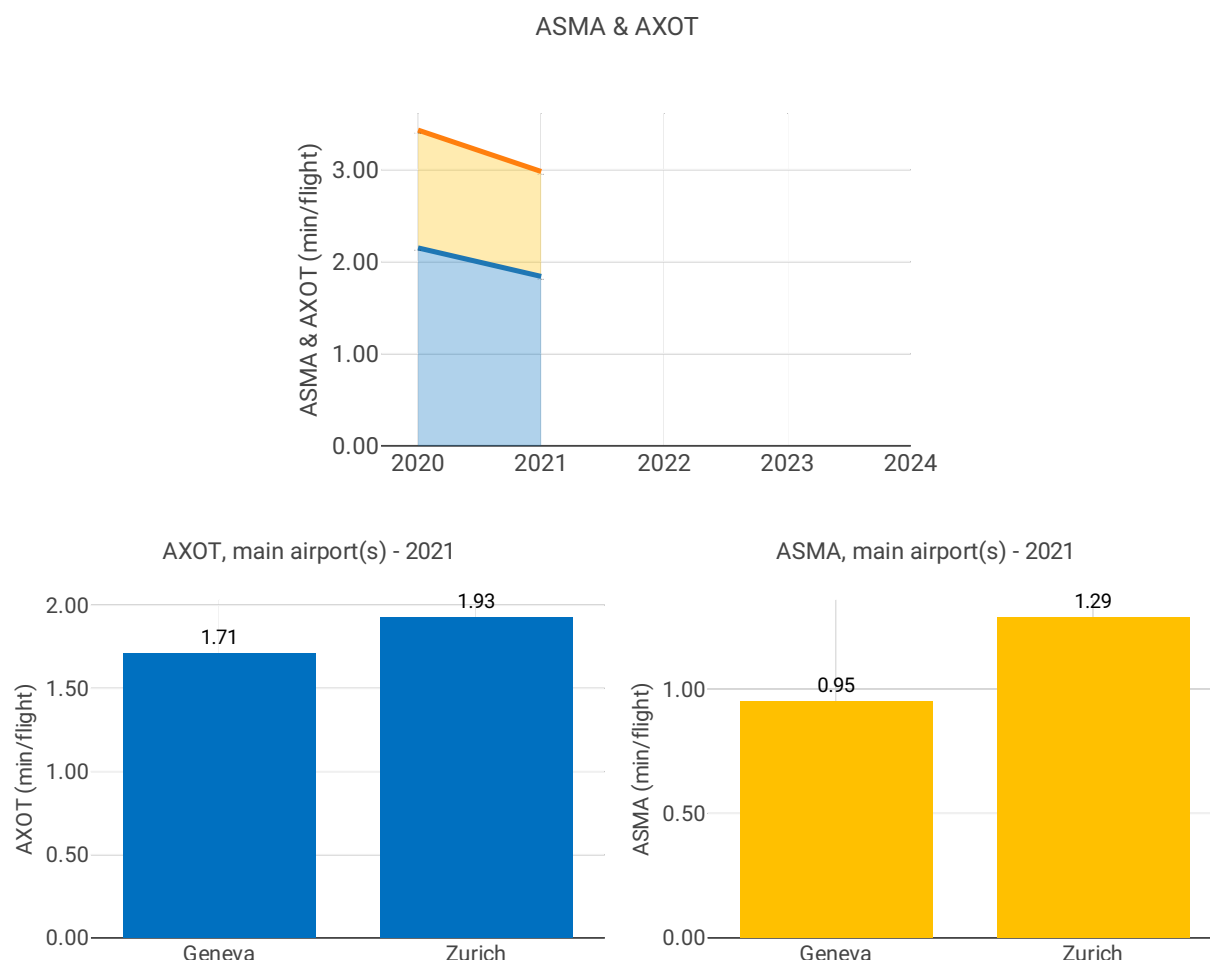
3.2 En route performance

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 (SCR) (PI#2)



3.3 Terminal performance

3.3.1 Additional taxi-out time (AXOT) (PI#3) & Arrival Sequencing and Metering Area (ASMA) time (PI#4)



Focus on ASMA & AXOT

AXOT

Additional taxi-out times at both Swiss airports decreased in 2021. However, this reduction at annual level is the consequence of much lower additional times in the period January to March (compared to January-March 2020, before the COVID crisis) and then a progressive increase of the taxi-out times exceeding the 2020 levels for the rest of the year.

According to FABEC monitoring report: *In Switzerland, ground efficiency benefited from traffic reduction during summer 2021. Further improvements will stem from CP1 Airport Operation Plan deployment.*

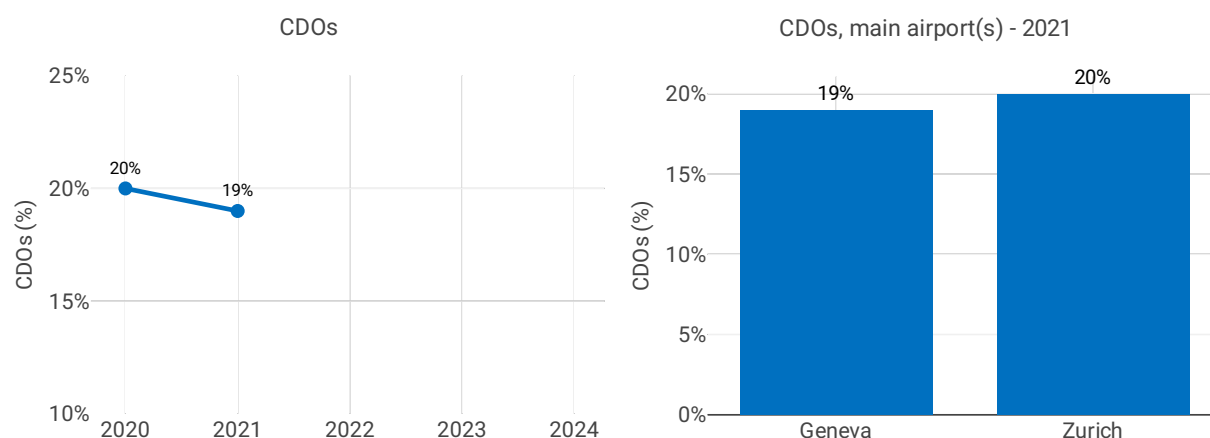
ASMA

Additional times in the terminal area decreased at annual level at Geneva (LSGG; 2019: 1.78 min/arr.; 2020: 1.27 min/arr.; 2021: 0.95 min/arr.) while at Zurich they remained at the same level (LSZH; 2019: 2.91 min/arr.; 2020: 1.28 min/arr.; 2021: 1.29 min/arr.). This annual value, like with the additional taxi-out times, is the result of much lower additional times in the period January to March (compared to January-March 2020, before the COVID crisis) and then a progressive increase of the ASMA times exceeding the 2020 levels for the rest of the year. At the end of the year, and still with lower traffic, the additional ASMA times were close to the 2019 levels.

According to FABEC monitoring report: *In Switzerland, efficiency within the last 40NM (additional time in descent flight phase) around LSZH remained stable in 2021 despite traffic increase. Performance could have however been better, European top30 airports average performance being 20% better in 2021 than in 2020. LSGG performance shows such improvement. It is to be noted that unimpeded time within TMA increased, showing a more conservative way of flying during traffic ramp-up. XMAN and Leading Optimised*

Runway Delivery (LORD) projects should help improving performance. ECTL is developing its indicator to differentiate structural and operational inefficiencies. On this basis, an analysis was performed by ECTL in 2022 for LSZH and discussed with operational experts.

3.3.2 Share of arrivals applying continuous descent operations (CDOs) (PI#5)



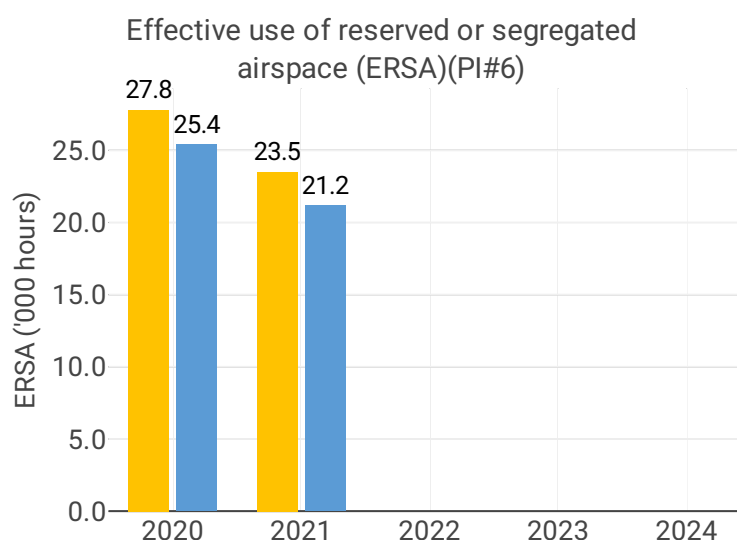
Focus CDOs

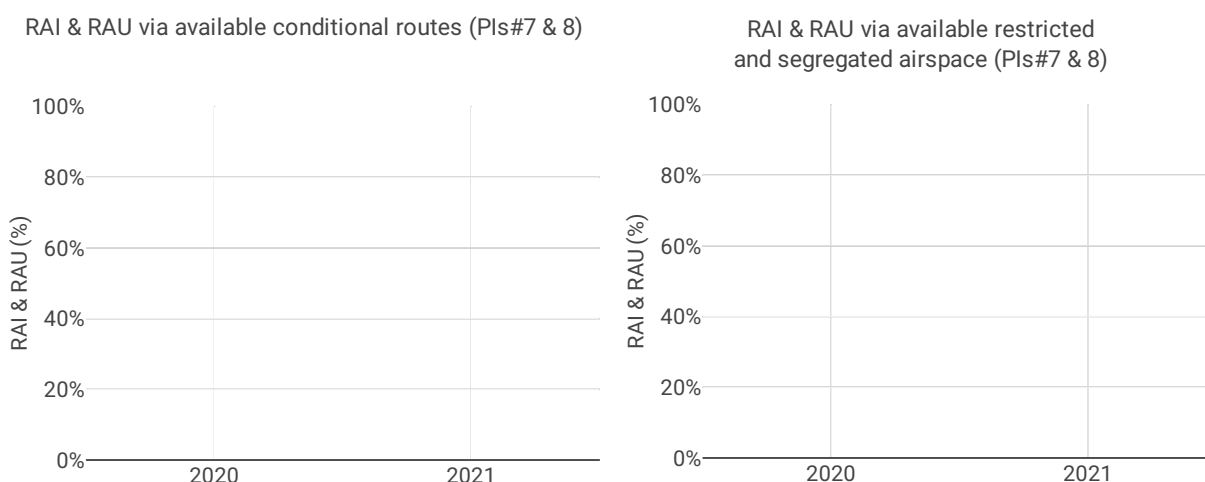
The share of CDO flights has decreased 0.9 percentage points for both Geneva and Zurich. Both have around 20% of CDO flights which is below the overall RP3 value in 2021 (30.5%). The two airports have a similar monthly evolution of the share of CDO flights with lower monthly values in the second half of 2021.

According to FABEC monitoring report: *In Switzerland, vertical flight efficiency from Top of Descent remained stable in 2021 despite traffic increase. Trials were performed with Swiss in 2020 that could only be debriefed in 2022. They show interesting room for improvement. A FABEC workshop was organized in 2021 on Vertical Flight Efficiency bringing a lot of food for thoughts.*

Airport Name	Airport level														
	Additional taxi-out time (PI#3)					Additional ASMA time (PI#4)					Share of arrivals applying CDO (PI#5)				
	2020	2021	2022	2023	2024	2020	2021	2022	2023	2024	2020	2021	2022	2023	2024
Geneva	2.06	1.71	NA	NA	NA	1.27	0.95	NA	NA	NA	NA	19%	NA	NA	NA
Zurich	2.23	1.93	NA	NA	NA	1.28	1.29	NA	NA	NA	NA	20%	NA	NA	NA

3.4 Civil-Military dimension





Focus on Civil-Military dimension

Update on Military dimension of the plan

Military - related measures implemented or planned to improve capacity

Initiatives implemented or planned to improve PI#6

Initiatives implemented or planned to improve PI#7

Initiatives implemented or planned to improve PI#8

4 CAPACITY - SWITZERLAND

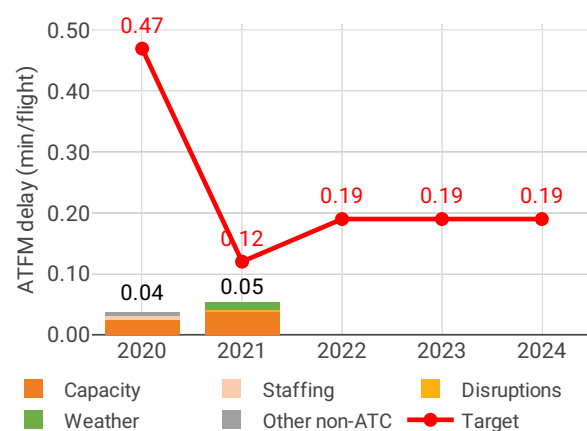
4.1 PRB monitoring

- Switzerland registered 0.08 minutes of average en route ATFM delay per flight during 2021, thus meeting the local breakdown value of 0.12. Geneva ACC accumulated 0.03 minutes of en route delay which was below the ACC reference value of 0.10 and Zurich ACC accumulated 0.09 minutes of delay which was also below the ACC reference value of 0.10.
- Delays should be considered in the context of lower traffic: in Switzerland, IFR movements in 2021 were 47% lower than in 2019.
- Traffic is expected to grow, with 2019 levels likely being reached in 2023 in high growth scenario or 2024 in the base growth scenario. The number of ATCOs in OPS is planned to be reduced slightly in both ACCs during RP3.
- Delays were highest in February and March and between June and October, mostly due to ATC Capacity issues and adverse weather conditions.
- The share of delayed flights with delays longer than 15 minutes in Switzerland decreased by 2.5 p.p. compared to 2020 and was lower than 2019 values.
- The yearly total of sector opening hours in Geneva ACC was 22,971, showing an 8.9% increase compared to 2020. Sector opening hours are 28.9% below 2019 levels. The yearly total of sector opening hours in Zurich ACC was 23,041, showing an 8.8% increase compared to 2020. Sector opening hours are 35.1% below 2019 levels.
- Geneva ACC registered 15.43 IFR movements per one sector opening hour in 2021, being 26.8% below 2019 levels. Zurich ACC registered 18.65 IFR movements per one sector opening hour in 2021, being 19.5% below 2019 levels.

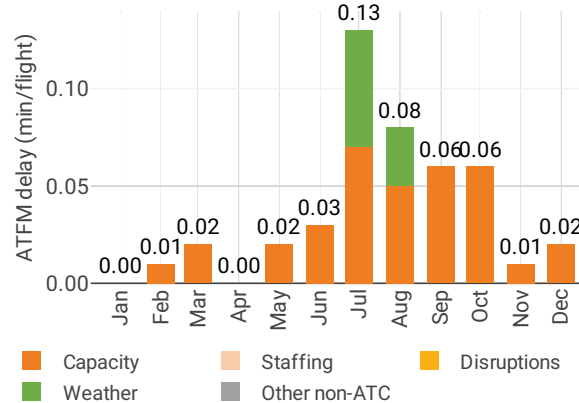
4.2 En route performance

4.2.1 En route ATFM delay (KPI#1)

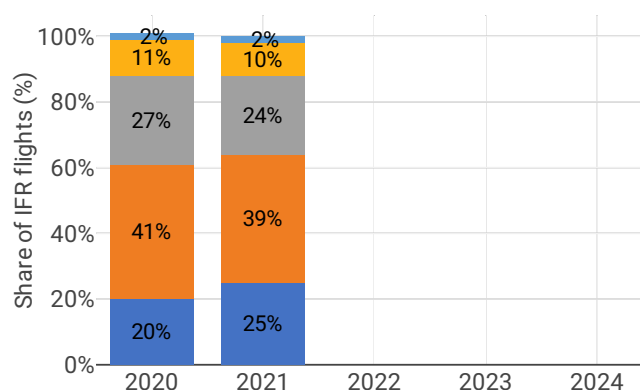
Average en route ATFM delay per flight by delay groups



Monthly distribution of en route ATFM delay by delay groups - 2021



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



Focus on en route ATFM delay

Summary of capacity performance

2021 en route capacity performance are monitored at FABEC level. Therefore, no inputs are available for the individual States.

NSA's assessment of capacity performance

N/A

Monitoring process for capacity performance

N/A

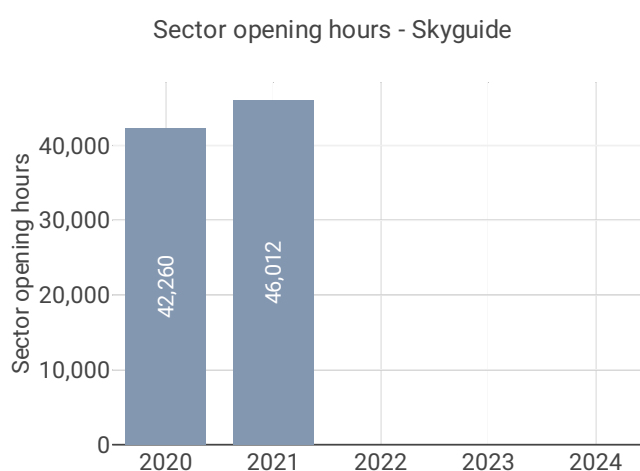
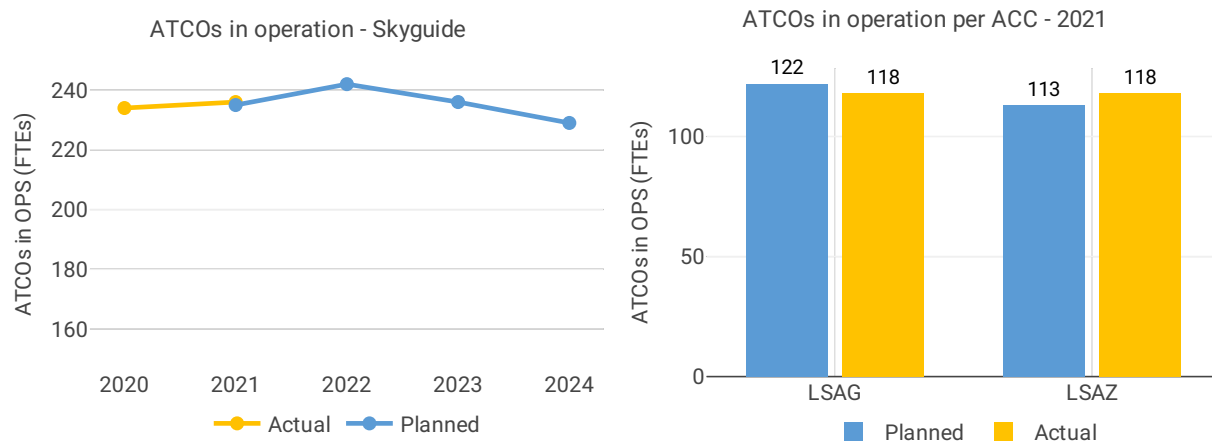
Capacity planning

N/A

Application of Corrective Measures for Capacity (if applicable)

N/A

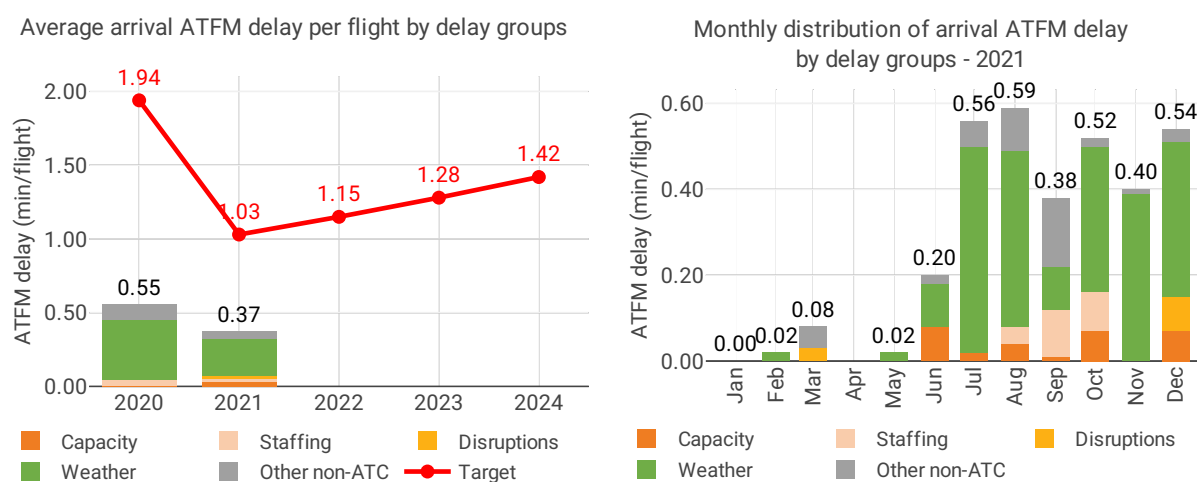
4.2.2 Other indicators



Focus on ATCOs in operations

4.3 Terminal performance

4.3.1 Arrival ATFM delay (KPI#2)



Focus on arrival ATFM delay

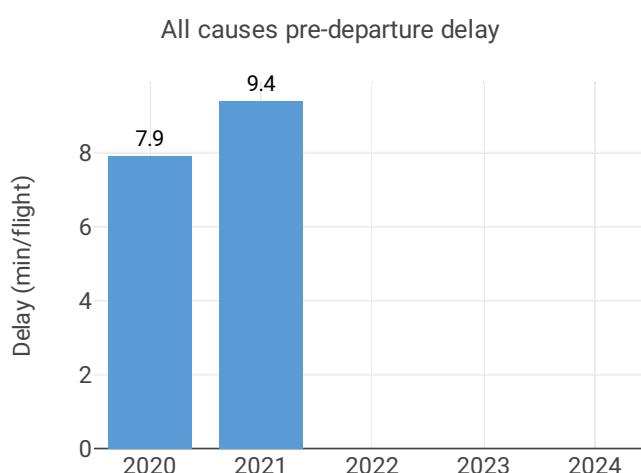
Switzerland identifies its two main airports Zurich (LSZH) and Geneva (LSGG) as subject to RP3 monitoring. Both airports have a fully implemented data flow that allows the proper monitoring of the pre-departure delays. Nevertheless, the quality of the reporting does not allow for the calculation of the ATC pre-departure delay at Geneva, with more than 60% of the reported delay not allocated to any cause. Traffic in 2021 at these two airports was still 52% lower than in 2019, but recovered 18% with respect to 2020. During 2021, arrival ATFM delays in Switzerland have decreased with respect to the previous year (2020: 0.55 min/arr, 2021: 0.37 min/arr). ATFM slot adherence has slightly improved (2021: 94.8%; 2020: 94.6%).

ATFM delays at both Swiss airports further decreased in 2021 and concentrated mostly in the second half of the year. At Zurich (LSZH: 2019: 1.99 min/arr.; 2020: 0.60 min/arr.; 2021: 0.51 min/arr.) 73% of these delays were attributed to weather and 13% to aerodrome capacity issues. At Geneva (LSGG: 2019: 1.04 min/arr.; 2020: 0.49 min/arr.; 2021: 0.19 min/arr.) 30% of the delays were attributed to weather, 29% to ATC staffing issues, 22% to ATC capacity and another 15% to aerodrome capacity.

The provisional national target on arrival ATFM delay in 2021 was met.

In accordance with Article 3 (3) (a) of Implementing Regulation (EU) 2020/1627: The incentive scheme shall cover only the calendar years 2022 to 2024. No bonus will be awarded to skyguide for 2021 achievement.

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



Airport level										
Airport name	Avg arrival ATFM delay (KPI#2)					Slot adherence (PI#1)				
	2020	2021	2022	2023	2024	2020	2021	2022	2023	2024
Geneva	0.49	0.19	NA	NA	NA	94.7%	93.1%	NA%	NA%	NA%
Zurich	0.60	0.51	NA	NA	NA	94.4%	96.0%	NA%	NA%	NA%

Airport name	ATC pre departure delay (PI#2)					All causes pre departure delay (PI#3)				
	2020	2021	2022	2023	2024	2020	2021	2022	2023	2024
Geneva	0.24	0.13	NA	NA	NA	8.5	9.0	NA	NA	NA
Zurich	0.48	0.39	NA	NA	NA	7.5	9.7	NA	NA	NA

Focus on performance indicators at airport level

ATFM slot adherence

With the drastic drop in traffic, the share of regulated departures from Zurich and Geneva virtually disappeared until July 2021. These airports showed adherence above 93% and the national average was 94.8%, similar to the performance in 2020 (94.6%). With regard to the 5.2% of flights that did not adhere, 4% was early and 1.2% was late.

ATC pre-departure delay

Zurich is the only Swiss airport where this indicator can be calculated. The performance has further improved (LSZH; 2019: 1.63 min/dep.; 2020: 0.52 min/dep.; 2021: 0.39 min/dep.) and even if it increased in the second half of 2021, it was still much lower than the 2019 values.

The share of unidentified delay reported by Geneva in 2020 was above 40% every month between April 2020 and July 2021, preventing the calculation of this indicator, due to the special traffic composition. Geneva had proper reporting before the pandemic and it has improved with the traffic recovery.

All causes pre-departure delay

The total (all causes) delay in the actual off block time at both Geneva and Zurich increased in 2021 (LSZH: 2020: 7.55 min/dep.; 2021: 9.66 min/dep.; LSGG: 2020: 8.46 min/dep.; 2021: 9.03 min/dep.). The highest delays per flight at these airports were observed in Summer and increased again at some airports at towards the end of the year.

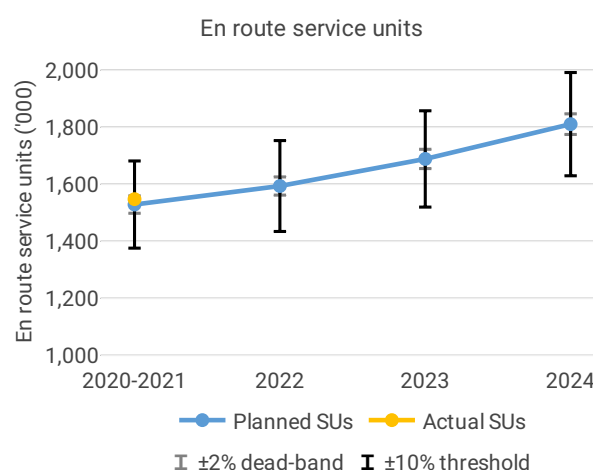
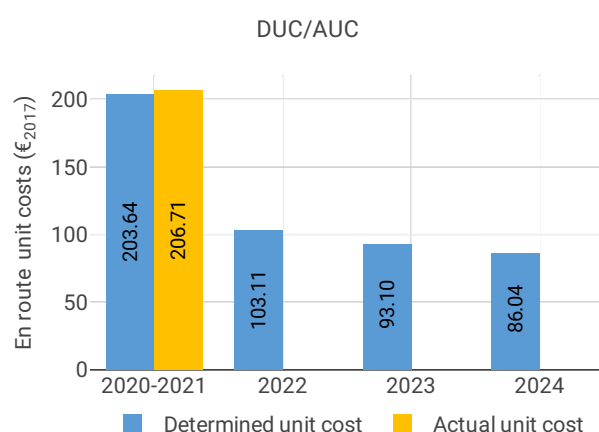
5 COST-EFFICIENCY - SWITZERLAND

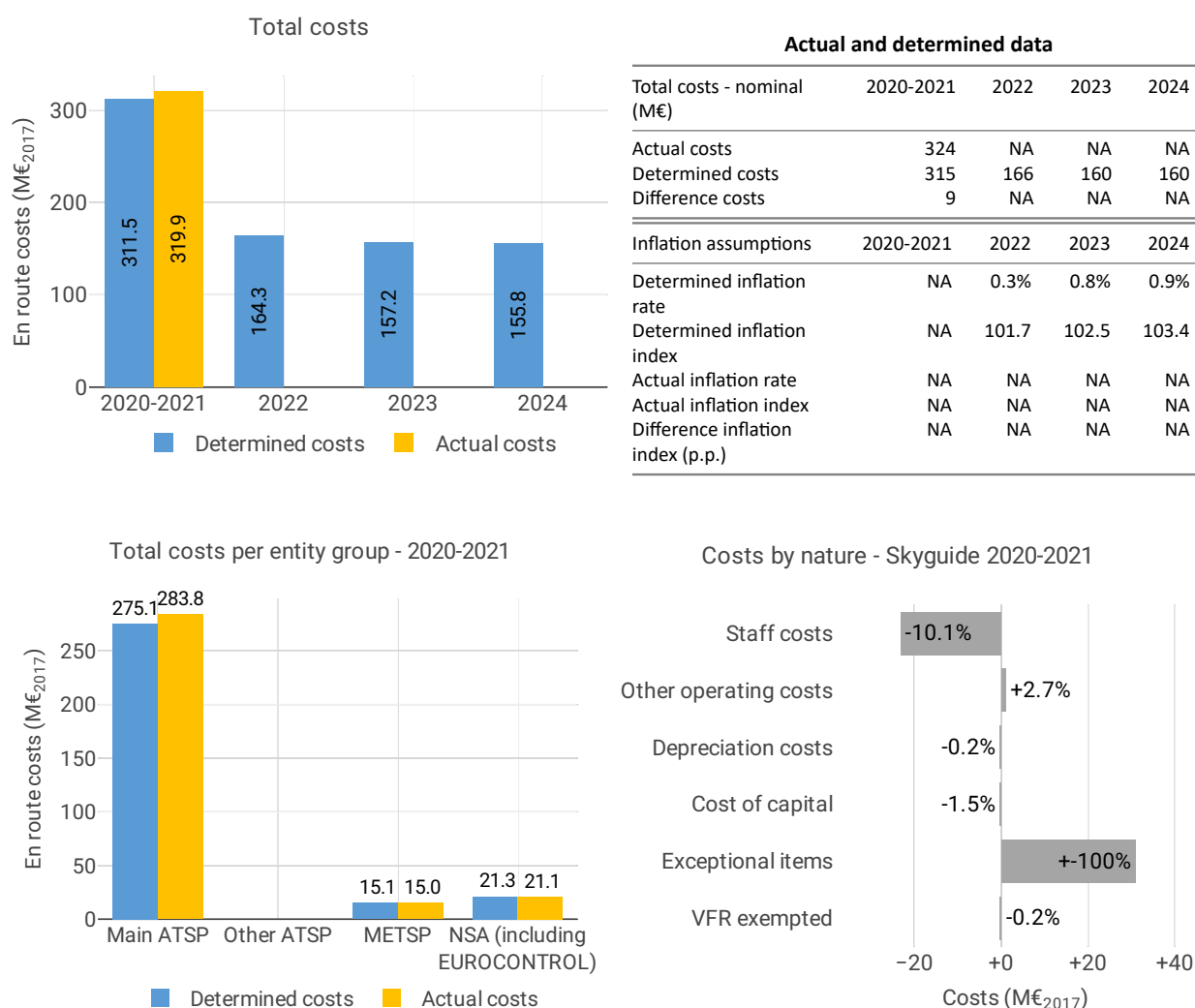
5.1 PRB monitoring

- The en route 2020/2021 actual unit cost of Switzerland was 206.71 €2017, +1.5% higher than the determined unit cost (203.64 €2017). The terminal 2020/2021 actual unit cost was 742.45 €2017, -4.5% lower than the determined unit cost (777.80 €2017).
- The en route 2021 actual service units (897K) were +2.1% higher than determined (879K).
- In 2021, Switzerland decreased total costs by -12 M€2017 (-7.3%) compared to determined costs. The decrease was mainly driven by a decrease in staff costs (-23 M€2017, or -18%), due to a provision on retirement age expected for 2021 but now postponed to 2022.
- However, the decrease in several cost categories is not transparent as it includes the non-invoicing of the financing of the delegated airspace, that was initially determined as negative exceptional items. In this regards, Switzerland should improve clarity in the reporting.
- Skyguide spent 43 M€2017 in 2021 related to costs of investments, in line with the determined.
- The en route actual unit cost incurred by users in 2020/2021 was 212.38€, while the terminal actual unit cost incurred by users was 814.95€.

5.2 En route charging zone

5.2.1 Unit cost (KPI#1)





Focus on unit cost

AUC vs. DUC

In the combined year 2020-2021, the en route AUC was +1.5% (or +3.41 CHF2017, +3.07€2017) higher than the planned DUC. This results from the combination of slightly higher than planned TSUs (+1.2%) and higher than planned en-route costs in real terms in a greater proportion (+2.7%, or +9.4 MCHF2017, +8.5 M€2017).

En route service units

The difference between actual and planned TSUs (+1.2%) falls within the $\pm 2\%$ dead band. Hence the resulting additional en-route revenue is kept by the ANSPs.

En route costs by entity

Actual real en route costs are +2.7% (+8.5 M€2017) higher than planned. This is driven by the main ANSP, Skyguide (+3.2%, or +8.7 M€2017), while the actual costs of the MET service provider and the NSA/EUROCONTROL are close to the determined costs (-0.3% and -0.7%, respectively).

En route costs for the main ANSP at charging zone level

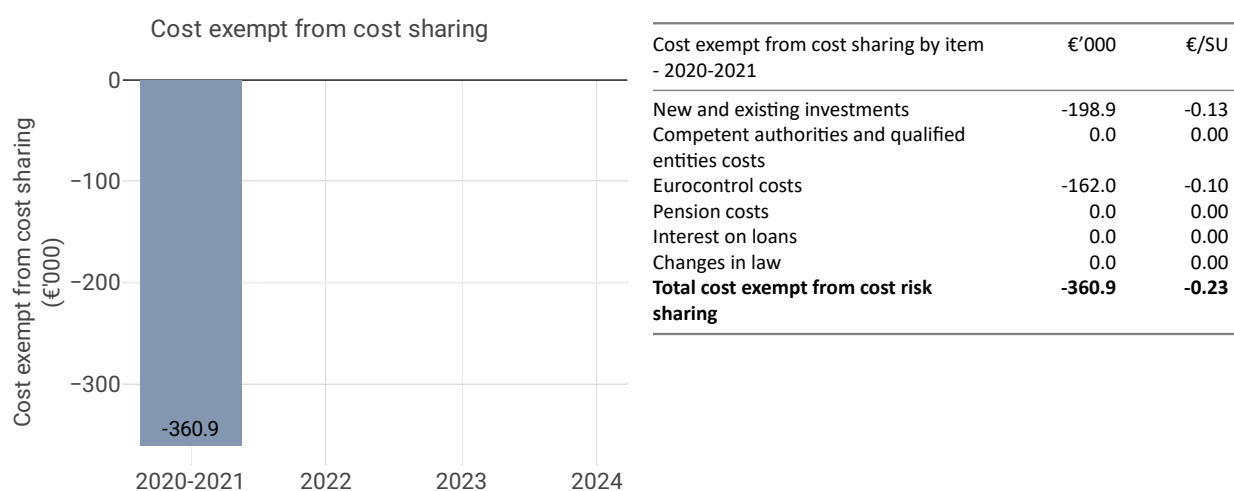
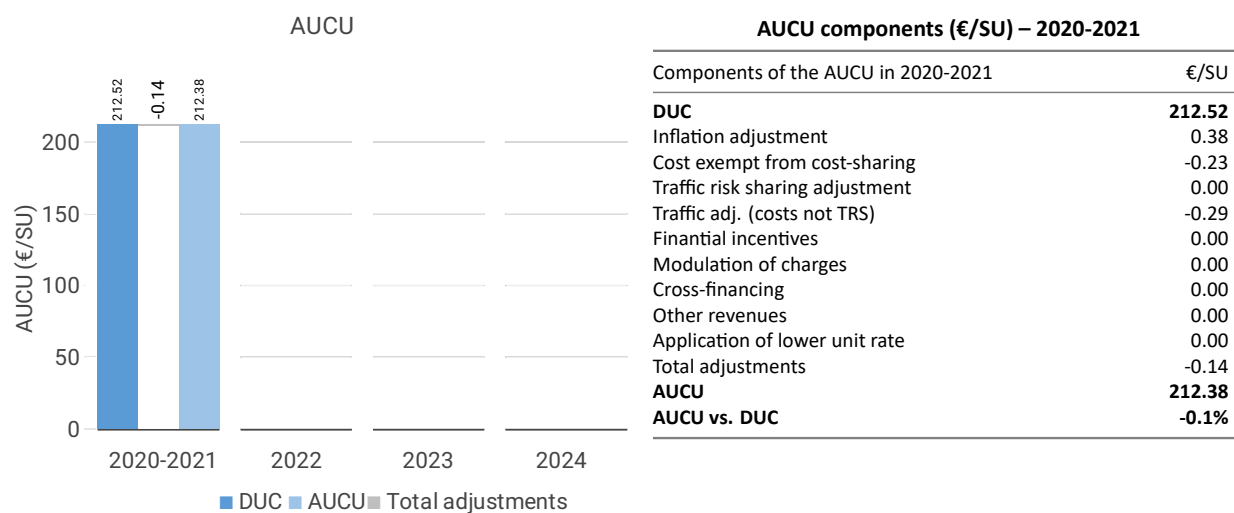
Actual en route costs in real terms are higher than planned by +3.2% overall (or +8.7 M€2017). However, the differences by nature of costs are distorted by two factors:

- The overall reported costs in each cost item are netted by the financing of the services provided by Skyguide outside the Swiss FIR;
- Skyguide's costs include significant amounts linked to the additional costs caused by the change in the capitalisation rule in 2021 (+10.2 M€2017) and to the reduced financing of delegated airspace in 2020 (+20.7 M€2017). However, in order for these amounts not to be billed to airspace users, they have also

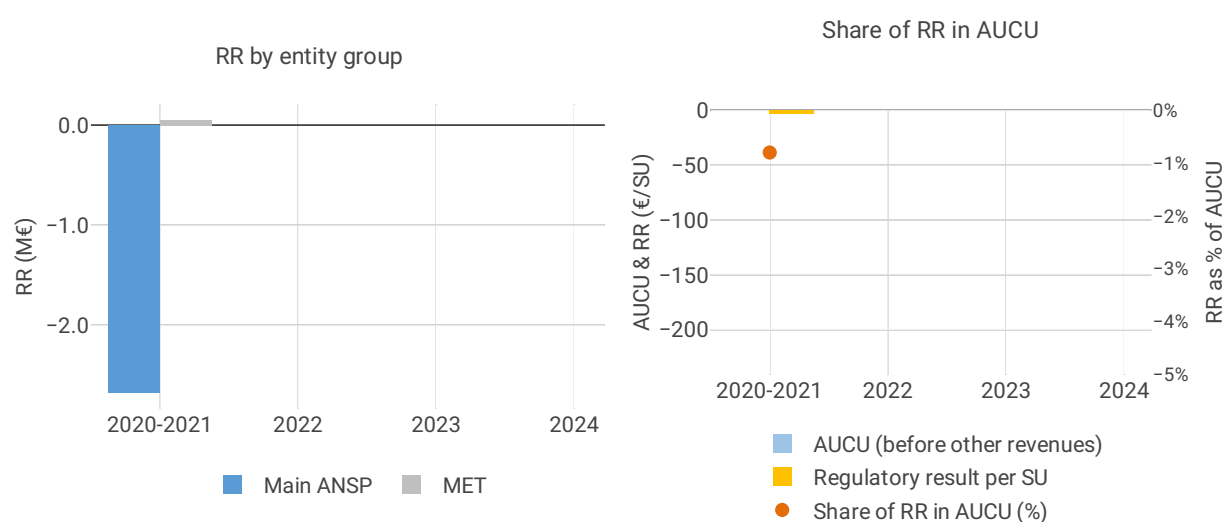
been reported as negative exceptional items in the determined costs, but not in the actual costs (-100% of negative exceptional costs, or +30.9 M€2017).

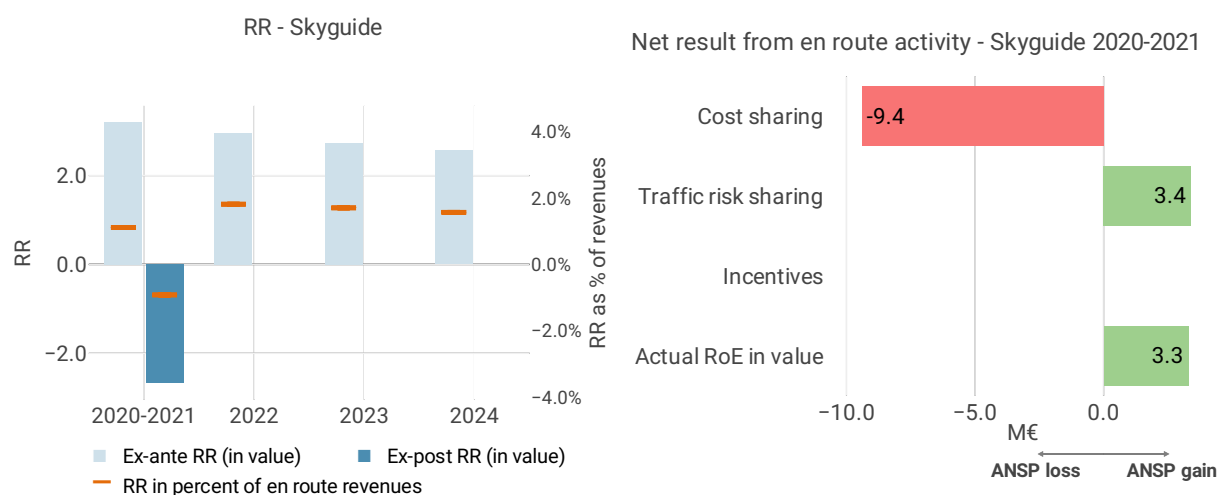
- the remaining difference in staff costs (which is overall of -23.1 M€2017 or -10.1%), is mainly due to the postponement of the “provision for ATCO retirement age”, which was contained in the 2021 determined costs.

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



5.2.3 Regulatory result (RR)





Focus on regulatory result

Skyguide net loss on activity in Switzerland en route charging zone in the combined year 2020-2021

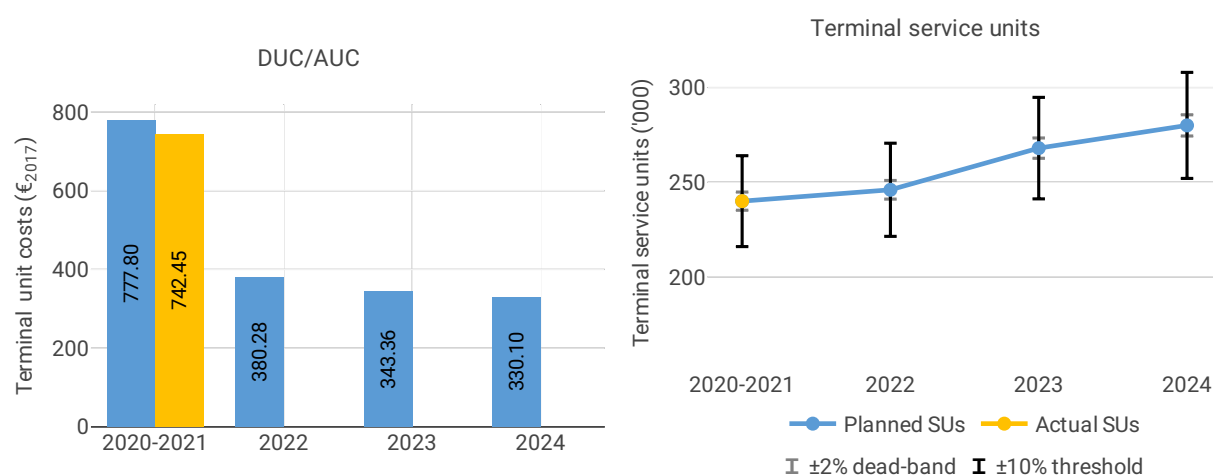
Skyguide incurred a net loss of -6.2 MCHF (-6.0 M€), resulting from a loss of -9.9 M CHF arising from the cost sharing mechanism, partially compensated by a gain of +3.7 M CHF arising from the traffic risk sharing mechanism.

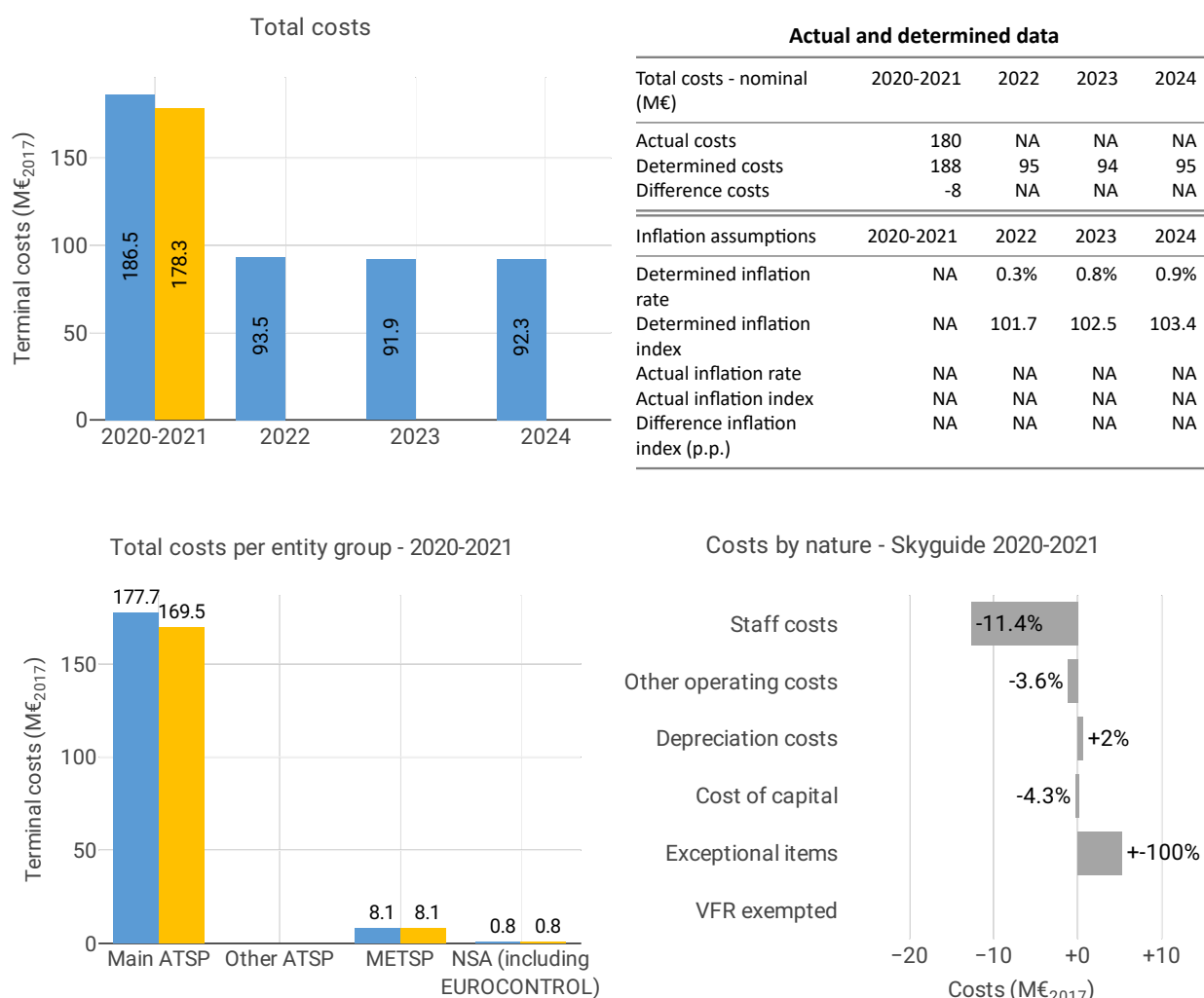
Skyguide overall regulatory results (RR) for the en route activity

Ex-post, the overall RR corresponding to the net loss from the en route activity mentioned above (-6.2 MCHF or -6.0 M€) and the RoE (+3.6 MCHF or +3.3 M€) amounts to a loss of -2.7 MCHF or -2.5 M€ (0.9% of the en route revenues). The resulting ex-post rate of return on equity is -2.4%, compared to 3.5% planned in the PP.

5.3 Terminal charging zone

5.3.1 Unit cost (KPI#1)





Focus on unit cost

AUC vs. DUC

In the combined year 2020-2021, the terminal AUC was -4.5% (or -39.28 CHF2017, -35.35 €2017) lower than the planned DUC. This results from the combination of slightly higher than planned TNSUs (+0.2%) and lower than planned en-route costs in real terms (-4.4%, or -9.1 MCHF2017, -8.2 M€2017).

Terminal service units

The difference between actual and planned TNSUs (+0.2%) falls within the $\pm 2\%$ dead band. Hence the resulting additional terminal revenue is kept by the ANSPs.

Terminal costs by entity

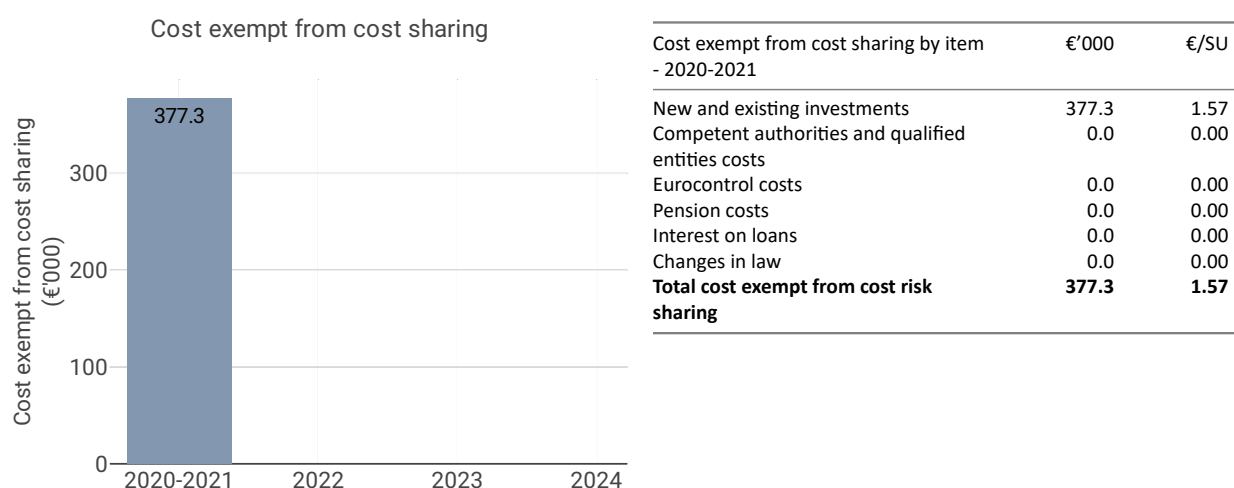
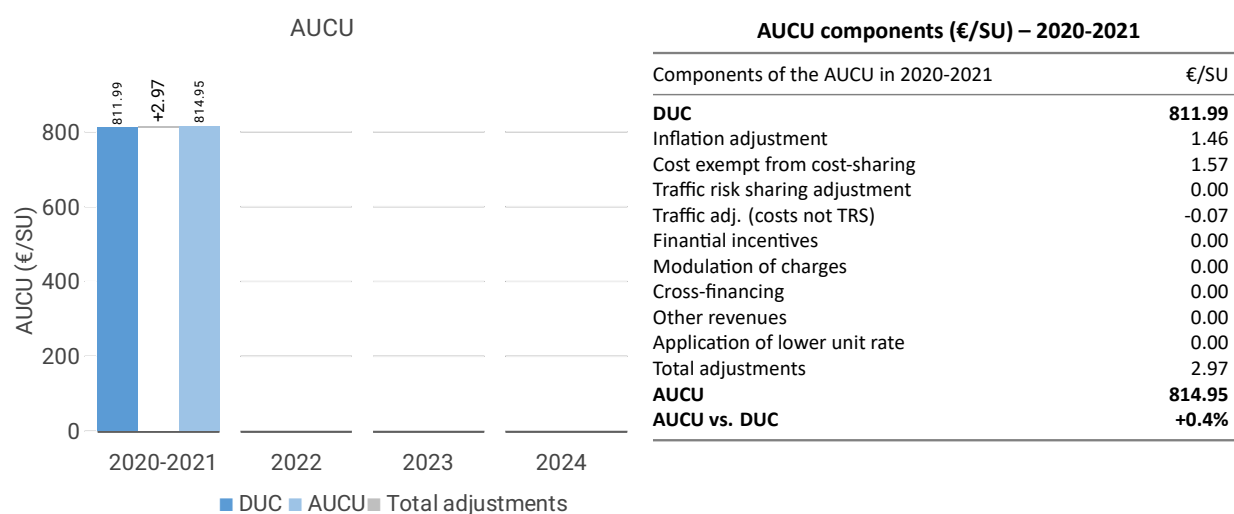
Actual real terminal costs are -4.4% (-8.2 M€2017) lower than planned. This is driven by the main ANSP, Skyguide (-4.6%, or -8.2 M€2017), while the actual costs of the MET service provider and the NSA are in line with the determined costs (-0.03% and 0.0%, respectively).

Terminal costs for the main ANSP at charging zone level

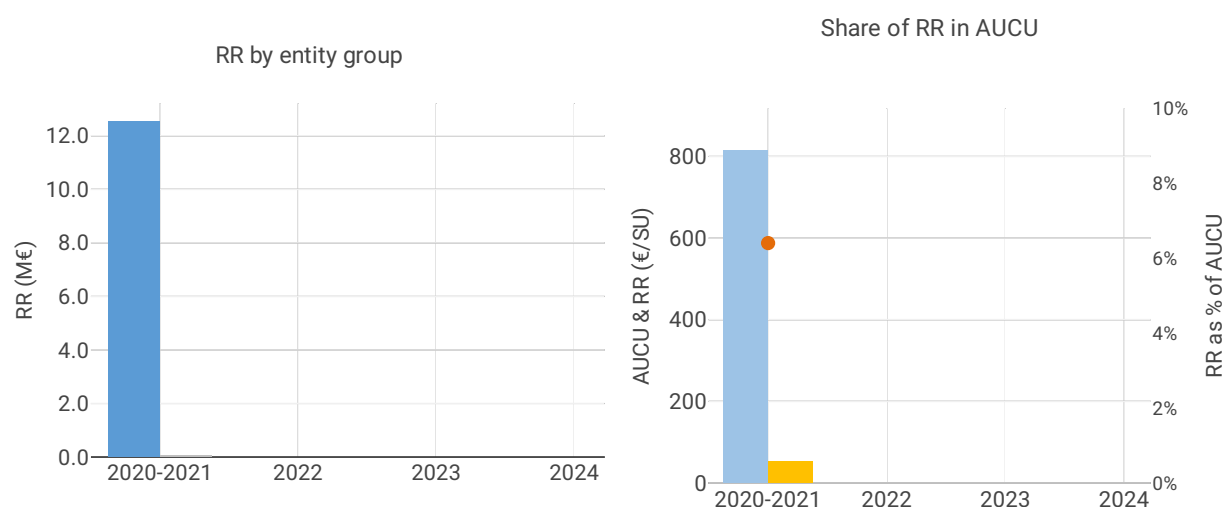
Actual terminal costs in real terms are lower than planned by -4.6% overall (or -8.2 M€2017). However, the differences by nature of costs are distorted by the presentation of the additional costs caused by the change in the capitalisation rule in 2021 (+5.3 M€2017). Indeed, in order for these amounts not to be billed to airspace users, they have also been reported as negative exceptional items in the determined costs, but not in the actual costs (-100% of negative exceptional costs, or +5.3 M€2017).

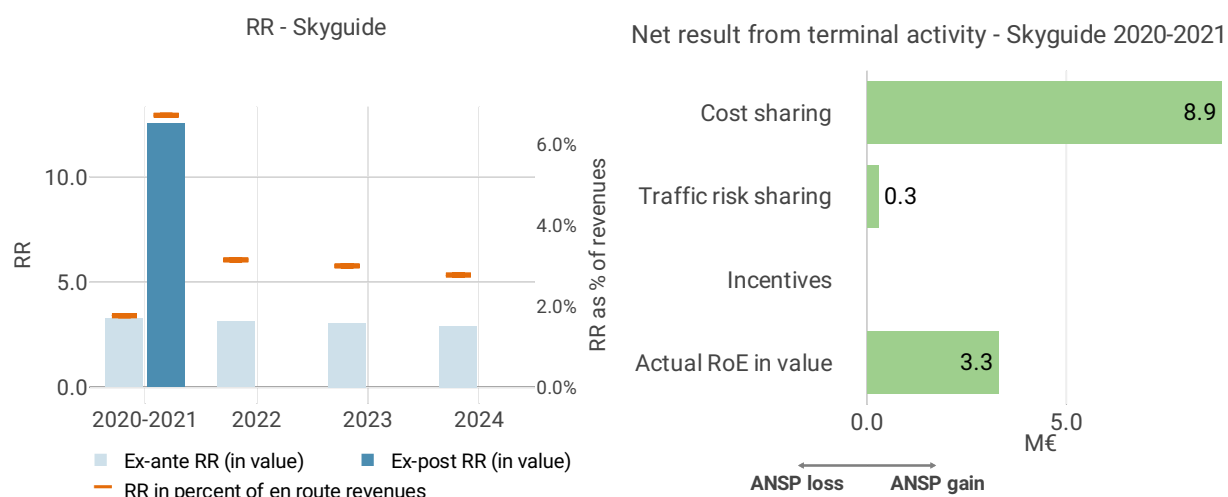
- the significant difference in staff costs (which is overall of -12.7 M€2017 or -11.4%), is mainly due to the postponement of the "provision for ATCO retirement age", which was contained in the 2021 determined costs.

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



5.3.3 Regulatory result (RR)





Focus on regulatory result

Skyguide net gain on activity in Switzerland terminal charging zone in the combined year 2020-2021

Skyguide incurred a net gain of +10.0 MCHF (+9.3 M€), combining a gain of +9.7 M CHF arising from the cost sharing mechanism and a gain of +0.3 M CHF arising from the traffic risk sharing mechanism.

Skyguide overall regulatory results (RR) for the terminal activity

Ex-post, the overall RR corresponding to the net gain from the en route activity mentioned above (+10.0 MCHF) and the RoE (+3.5 MCHF) amounts to a gain of +13.5 MCHF (6.7% of the terminal revenues). The resulting ex-post rate of return on equity is 12.3%, compared to 3.6% planned in the PP.