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Signatories

Performance plan details				
State name Ireland				
Status of the Performance Plan	Draft performance plan (Art. 12 of IR 2019/317)			
Date of issue	01/10/2024			
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Performance Plan				
Date of adoption of Final				
Performance Plan				

We hereby confirm that the present performance plan is consistent with the scope of Implementing Regulation (EU) No 2019/317 pursuant to Article 1 of Regulation (EU) No 2019/317 and Article 7 of Regulation (EC) No 549/2004.

Name, title and signature of representative	
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Additional comments	

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0.1	01/10/2014	Completion of draft Performance Plan					

SECTION 1: INTRODUCTION

1.1 The situation

- 1.1.1 List of ANSPs and geographical coverage of services
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1 - INTRODUCTION

1.1 - The situation

NSA(s) responsible for drawing up the	Irish Aviation Authority
Performance Plan	

1.1.1 - List of ANSPs and geographical coverage and services

Number of ANSPs	2						
ANSP name	Services	Type of entity	Geographical scope				
AirNav Ireland	ANS Provision		En Route air navigation services in the Shannon Flight Information Region (FIR) and Shannon Upper Information Region (UIR). Terminal services provided at Dublin, Shannon, and Cork airports.				
Met Éireann Aviation Services Division (ASD)	Meteorological services for ANS		Shannon Flight Information Region (FIR) and Shannon Upper Information Region (UIR). Dublin, Shannon and Cork airports.				

Cross-border arrangements for the provision of ANS services*

* To be reported in the performance plan: any cross-border area or group of adjacent cross-border areas of a size above 500 km², unless the area or group of areas concerned has fewer than 7,500 controlled flight movements on average per year

Number of cross-border area(s) where the ANSP(s) of the Member State provide(s) services in	2
another State's charging zone(s)	3

Cross-border service provision in the charging zone(s) of another State						
ANSP Name Name of the cross-border area(s) Charging zone in which services are provided						
AirNav Ireland	Isle of Man (IOM) sector and L18 conditional route	London FIR				
AirNav Ireland	BANBA Box	London FIR				
AirNav Ireland	TAKAS Box	London FIR				

Number of cross-border area(s) where ANSP(s) from another State provide(s) services in the	1
charging zone(s) covered by the performance plan	-

Cross-border service provision in the charging zone(s) covered by the performance plan					
NSP Name Name of the cross-border area(s) Charging zone in which services are provided					
NATS Donegal Area		Shannon FIR			

1.1.2 - Other entities in the scope of the Performance and Charging Regulation as per Article 1(2) last para.

Number of other entities	1			
Entity name	Domain of activity	Rationale for inclusion in the Performance Plan		
Department of Transport	Member State	Qualifying entity incurring eligible costs as per Article 15(2) of Regulation (EC) No 550/2004.		

1.1.3 - Charging zones (see also 1.4-List of Airports)

En-route	Number of en-route charging zones	1				
En-route charging zone 1	Ireland					
Terminal	Number of terminal charging zones	1				
Terminal charging zone 1	Ireland - TCZ					

1.1.4 - Other general information relevant to the plan

Relevant local circumstances with high significance for performance target setting

The key overall picture as regards local circumstances is an identified need for AirNav Ireland to invest significantly in the ATM systems and in operational staffing levels (ATCOs and engineers) over RP4, to ensure that a high quality service can be delivered in a safe manner in RP4 and beyond.

Additional information

This draft Performance Plan is accompanied by and should be read alongside the NSA's consultation documents published in January and July 2024, our decision document where we address the consultation reponses received from the regulated ANSPs, airspace users, and ANSP staff representatives, and our updated main Performance Plan financial model which shows the derivation of figures, charts, and forecasts. Further, we have also provided the draft and final efficiency assessment and operating cost forecasts in respect of AirNav Ireland carried out by CEPA/THINK, commissioned by the IAA as part of our consideration of the appropriate levels of efficient and eligible Determined Costs to set for RP4. The IAA has previously worked with the same consultants in the context of efficiency assessments of Dublin Airport, in our role in setting the price cap on airport charges at Dublin Airport. The fully unredacted versions of these reports can be provided to the PRB and/or the European Commission, if helpful.

This material is also published on the following page: https://www.iaa.ie/commercial-aviation/economic-regulation/air-navigation-charges/performance-plan-for-rp4.

Other material which is appended to the Performance Plan are the business plan submissions from the regulated entities and the consultation responses recieved in response to our Draft Decision, which are also published on that page.

1.2 - Traffic Forecasts

1.2.1 - En route

En route Charging zone 1	Ireland								
En route traffic forecast				STATFOR	February 2	2024 (Base	e)		
STATFOR February 2024 (Base)	2022A	2023A	2024	2025	2026	2027	2028	2029	CAGR 2024-2029
IFR movements (thousands)	582	664	701	723	738	752	769	782	2.2%
IFR movements (yearly variation in %)		14.1%	5.4%	3.2%	2.0%	1.9%	2.3%	1.7%	
En route service units (thousands)	4,233	4,812	5,048	5,175	5,256	5,349	5,458	5,544	1.9%
En route service units (yearly variation in %)		13.7%	4.9%	2.5%	1.6%	1.8%	2.0%	1.6%	

1.2.2 - Terminal

Terminal Charging zone 1	Ireland -	TCZ							
Terminal traffic forecast				STATFOR	February 2	2024 (Base	e)		
STATFOR February 2024 (Base)	2022A	2023A	2024	2025	2026	2027	2028	2029	CAGR 2024-2029
IFR movements (thousands)	125	142	151	158	162	165	170	173	2.8%
IFR movements (yearly variation in %)		13.7%	6.6%	4.6%	2.6%	2.1%	2.7%	1.8%	
Terminal service units (thousands)	170	193	205	215	221	226	233	237	3.0%
Terminal service units (yearly variation in %)		13.5%	6.3%	4.7%	2.9%	2.3%	2.9%	2.1%	

1.3 - Stakeholder consultation

1.3.1 - Overall outcome of the consultation of stakeholders on the performance plan

Description of main points raised by stakeholders and explanation of how they were taken into account in developing the performance plan

The stakeholders focused primarily on the proposed cost forecasts. Broadly, the ANSPs and the staff representatives stressed the need to take sufficient account of what they asserted would be factors driving cost increases over RP4, so as to ensure the required levels of safety and service quality would be maintained. Airspace users stressed the need for any cost increases to be proportionate, and to reflect an optimal blend between cost efficiency and capacity, while ensuring safety. Airspace users broadly supported the IAA's cost forecasts (which were lower than those of the ANSPs), such as in relation to ATCO and engineer staffing levels, but (in some cases) did not support any resulting increase in the forecast unit rates and/or considered certain aspects of our forecast assumptions were insufficiently challenging. There was general support for the overall approach taken by the IAA to developing the draft Performance Plan, and for the safety targets. As per our usual approach to setting regulatory price controls, the IAA took account of any specifics of these submissions, and where a compelling argument and/or evidence to adjust our proposal was provided, we adjusted our proposal accordingly. Further specific details on each submission made and the response of the IAA to that submission are available, by topic, in the Final Decision document, and in the final CEPA report.

${\bf 1.3.2} \hbox{ - Specific consultation requirements of ANSPs and airspace users on the performance plan}$

Topic of consultation	Applicable	Results of consultation
Establishment of determined costs included in the cost base for charges	Yes	The determined costs have changed in various ways based on the responses received from the ANSPs (AirNav Ireland and MET Eireann), the AirNav Ireland Staff Panel, and airspace users. Overall, operating costs are somewhat higher, and capital costs somewhat lower, in our Final Decision compared to our Draft Decision. Full detail, and the reasons why submissions were accepted or rejected, is set out in the CEPA final report, and the IAA's Final Decision document. Our overall approach remained unchanged, in that we aim to develop a centreline forecast of efficient costs which is consistent with delivering a high-quality service in a safe manner.
New and existing investments, and in particular new major investments, including their expected benefits	Yes	There was general support for the proposed major investments, particularly given that, for RP4, the major investments relate to primarily to the ATM systems. AirNav Ireland stressed the importance of a step increase in engineering headcount to deliver the investment programme it has outlined for RP4, highlighting the primary drivers of this investment programme are resilience, compliance, and improving key metrics in the KPAs of safety, environment, cost and capacity. The IAA proposed to reduce AirNav Ireland's proposed general investment programme by 20%, primarily as a result of doubts that the full programme is likely to be delivered within RP4, and also proposed to adjust a number of proposed asset life assumptions. Such a reduction was generally supported by airspace users (but not AirNav Ireland), and has been maintained in the Final Decision.
Charging policy	Yes	The charging policy is unchanged from the consultation. Airspace users were supportive of the return of capital costs associated with unspent RP3 capex being spread across the Terminal unit rate evenly throughout RP4 rather than front-loading, to create a smoother Terminal unit rate across the period. On the other hand, we proposed to frontload the return of En Route capital which, in that case, would offset the increase in the unit rate at the start of RP4, making for a smoother unit rate profile.
Maximum financial advantages and disadvantages for the mandatory incentive scheme on capacity	Yes	Airspace users supported the proposed assymetric approach whereby the maximum disadvantage would be set to 1%, and the maximum advantage would be set to 2ero. The AirNav Ireland staff representatives were concerned that the proposal could be counterproductive, as reduced revenue could lead to a 'negative feedback loop' whereby there would be less funds available to address the capacity issues that led to the targets not being met in the first place. The IAA decided not to change this proposal, for the reasons set out in section 14 of the Draft Decision and Final Decision documents.
Symmetric range ("dead band") for the purpose of the mandatory incentive scheme on capacity	Yes	AirNav Ireland did not support the application of a deadband of zero. The IAA has nonetheless decided to maintain this proposal in the Final Decision, for the reasons set out in section 14 of the Draft Decision and Final Decision documents.
Where applicable, decision to modulate performance targets for the purpose of pivot values to be used for the mandatory incentive scheme on capacity	Yes	The proposal to use CRSTMP-modulated pivot values for the Terminal incentive scheme was supported by AirNav Ireland, and not otherwise commented on substantively by other stakeholders. AirNav Ireland also advocated for the same approach for the En Route incentive scheme, however the IAA has decided to adopt Fixed pivot values in that case, for the reasons set out in section 14 of the Draft Decision and Final Decision documents.
Establishment or modification of charging zones	No	This was already the subject of consultation in the 'Issues Paper', in January 2024. No party was in favour of lany changes.
Where applicable, values of the modulated parameters for the traffic risk sharing mechanism	No	AirNav Ireland supported the proposal to apply the default parameters.
Where applicable, decision to apply the simplified charging scheme	No	No such proposal was made, and no stakeholders suggested this approach.
Where applicable, decision to diverge from the STATFOR base forecast	No	Using the STATFOR base forecast of February 2024 was generally supported, although there was some suggestion that we should take account of the more recent short-term forecast update and/or airline fleet deployment plans. The IAA did not consider that there was sufficient justification to diverge from the STATFOR base forecasts, for the reasons set out in section 3 of the Draft Decision and Final Decision documents.

1.3.3 - Consultation of stakeholder groups on the performance plan

	#1 - ANSPs
Stakeholder group composition	AirNav Ireland, MET Eireann Aviation Services Division, CANSO
Dates of main meetings / correspondence	The main consultation meeting was held on 2 August. Responses to the Draft Decision were received from both ANSPs on 23rd August, which have been published alongside the IAA's Final Decision.
	All of the elements of the proposed Performance Plan were discussed. The main issues the ANSPs raised during the consultation process related to the

Main issues discussed	operating cost forecasts proposed by the IAA in respect of both ANSPs, which they considered to be insufficient and/or excessively challenging in a number of respects. In the case of AirNav Ireland, it also submitted that our proposed capital cost forecasts were too low, because the proposed WACC and the new capex allowances are too low, and it disputed a number of our proposed asset life assumptions.
Actions agreed upon	The IAA agreed to take into account these submissions, and to make changes to the proposed Performance Plan if sufficient evidence that this is warranted is provided in the written submission.
Points of disagreement and reasons	The level of the cost forecasts, as well as the proposed incentive schemes, as outlined above.
Final outcome of the consultation	The operating cost forecasts have been updated to reflect some of the points raised by the ANSPs, and are now somewhat higher overall, as detailed in sections 4 and 7 of the Final Decision document and the CEPA final report, although remaining below the entities' Business Plan submissions. We do not agree with AirNav Ireland that the proposed capital costs were too low, as set out in sections 5 and 6 of the Final Decision document.

Additional comments	

	#2 - Airspace Users				
Stakeholder group composition	IATA, Aer Lingus, IAG, Ryanair, Swiss Air				
Dates of main meetings / correspondence	The main consultation meeting was held on 2 August. Responses to the Draft Decision were received on 23rd August, which have been published alongside the IAA's Final Decision.				
Main issues discussed	All of the elements of the proposed Performance Plan were discussed. The main topics raised by airspace users were the justifications for the proposed real increase in ANSP operating costs and the need to ensure that any required increases in staffing levels were efficient/proportionate. There was also discussion on the necessity for certain Capex projects and whether the IAA's 20% proposed reduction in the investment programme is sufficient, and on the forecast unit rates and the timing of adjustments.				
Actions agreed upon	The IAA agreed to take into account these submissions, and to make changes to the proposed Performance Plan if sufficient evidence that this is warranted is provided in the written submissions.				
Points of disagreement and reasons	The main point of disagreement related to the forecast increase in the En Route unit rate.				
Final outcome of the consultation	We agree that any cost increases need to be proportionate and reflect efficient service delivery. Some of the operating cost forecast input assumptions have been updated to reflect some of the points raised by the airspace users, although ultimately the final opex forecasts are somewhat higher as a result of the submissions from the ANSPs, as detailed in sections 4 and 7 of the Final Decision document and the CEPA final report, although remaining below the entities' Business Plan submissions. On the other hand, capital costs forecasts are somewhat lower than was proposed in the Draft Decision, as set out in sections 5 and 6 of the Final Decision document.				

	Additio	onal comments					
		Additio	Additional comments				

#3 - Professional staff representative bodies				
Stakeholder group composition	AirNav Ireland Staff Panel, ATCEUC			
Dates of main meetings / correspondence	The main consultation meeting was held on 2 August. A response to the Draft Decision was received from the staff panel on 23rd August, which has been			
Dates of main meetings / correspondence	published alongside the IAA's Final Decision.			
	All of the elements of the proposed Performance Plan were discussed. The main issues the staff representatives raised during the consultation process			
Nation income discovered	related to the operating cost forecasts proposed by the IAA, which they also considered to be insufficient and/or excessively challenging in a number of			
Main issues discussed	respects. They also considered that the capacity targets proposed were too stretching, and that we should instead use the national reference values.			
	The IAA agreed to take into account these submissions, and to make changes to the proposed Performance Plan if sufficient evidence that this is			
Actions agreed upon	warranted is provided in the written submissions.			
Points of disagreement and reasons	The operating cost forecasts, and the proposed capacity targets, as outlined above.			
Final outcome of the consultation	The IAA made a number of adjustments to the operating cost forecast input assumptions, but not to the extent suggested by the staff representatives.			
That outcome of the consultation	The IAA did not change the proposed capacity targets.			

	Additional comments		

	#4 - Airport operators
Stakeholder group composition	None
Dates of main meetings / correspondence	
Main issues discussed	
Actions agreed upon	
Points of disagreement and reasons	
Final outcome of the consultation	

Additional comments

#5 - Airport coordinator			
Stakeholder group composition	No		
Dates of main meetings / correspondence			

Main issues discussed				
Actions agreed upon				
Points of disagreement and reasons				
Final outcome of the consultation				
Additional comments				

#6 - Other (specify)					
Stakeholder group composition	PRB, EUROCONTROL, Irish Department of Transport				
Dates of main meetings / correspondence	Attended the meeting of 2 August in an observer capacity.				
Main issues discussed	n/a				
Actions agreed upon	n/a				
Points of disagreement and reasons	n/a				
Final outcome of the consultation	n/a				

	Additiona	comments			
		Additional	Additional comments	Additional comments	Additional comments

1.4 - List of airports subject to the performance and charging Regulation

1.4.1 - Airports as per Article 1(3) (IFR movements ≥ 80 000)

			IFR air transport movements			5
ICAO code	Airport name	Charging Zone	2021	2022	2023	Average
EIDW	Dublin	Ireland - TCZ	91,015	211,367	240,694	181,025

1.4.2 Other airports added on a voluntary basis as per Article 1(4)

Number of airports	2					
ICAO code	Airport name	Charging Zone	Additional information			
EICK	Cork	Ireland - TCZ				
EINN	Shannon	Ireland - TCZ				

Additional comments
No change from the Revised RP3 Performance Plan with regard to the continued inclusion of Cork and Shannon in a single Terminal Charging Zone
alongside Dublin Airport.

1.5 - Services under market conditions

1.6 - Process followed to develop and adopt a FAB Performance Plan

Description of the process
Not applicable

1.7 - Establishment and application of a simplified charging scheme

Is the State intending to establish and apply a simplified charging scheme for any charging zone/ANSP?	No

SECTION 2: INVESTMENTS

2.0 - Summary of investments

2.1 - Investments - AirNav Ireland

- 2.1.1 Summary of investments
- 2.1.2 Detail of new major investments
- 2.1.3 Other new and existing investments

2.2 - Investments - Met Éireann Aviation Services Division (ASD)

- 2.2.1 Summary of investments
- 2.2.2 Detail of new major investments
- 2.2.3 Other new and existing investments

Annexes of relevance to this section

ANNEX E. INVESTMENTS

NOTE: The requirements as per Annex II, 2.2.(c) are addressed in item 4.1.3

2.0 - Summary of Investments

AirNav Ireland

	Total value of the assets allocated to ANS in	to ANS in depreciation and cost of leasing) (in national currency)						
	contractual leasing value) (in national currency)	the scope of the performance plan (in national currency)		2025	2026	2027	2028	2029
			Average NBV	0	3,413	13,305	18,839	44,964
New major investments for RP4 (Table A)	118,100	92,191	Depreciation	0	349	2,408	3,038	5,773
			Cost of leasing	0	0	0	0	0
Other new investments for RP4 (below	93,253	74,602	Average NBV	35,548	51,558	71,294	78,243	86,796
·			Depreciation	3,397	4,947	6,008	6,601	7,510
5M€) (Table B)			Cost of leasing	0	0	0	0	0
Major investments from DD2 /Tobles C	110,781	101,047	Average NBV	59,278	60,811	56,211	52,576	47,743
Major investments from RP3 (Tables C +			Depreciation	4,392	4,818	5,174	5,254	4,775
D)			Cost of leasing	0	0	0	0	0
Fuithing investor and from a consider		6,275	Average NBV	41,761	40,394	44,741	48,532	26,731
Existing investments from previous	7,844		Depreciation	4,541	3,974	3,041	2,459	1,560
reference periods (Table E)			Cost of leasing	0	0	0	0	0
		274,115	Average NBV	136,587	156,176	185,550	198,190	206,233
Total for the ANSP in RP4	329,978		Depreciation	12,329	14,087	16,630	17,352	19,618
	·		Cost of leasing	0	0	0	0	0

Met Éireann Aviation Services Division (ASD)

	Total value of the asset (capex or	Value of the assets allocated to ANS in							
	contractual leasing value) (in national currency)	performance plan (in national currency)		2025	2026	2027	2028	2029	
			Average NBV	0	0	0	0	0	
New major investments for RP4 (Table A)	0	0	Depreciation	0	0	0	0	0	
			Cost of leasing	0	0	0	0	0	
Other new investments for RP4 (below	34,722		Average NBV	264	270	398	368	513	
5M€) (Table B)			Depreciation	142	204	521	548	877	
Sivie, (Table B)			Cost of leasing	0	0	0	0	0	
Major investments from RP3 (Tables C +	0	0	Average NBV	0	0	0	0	0	
,			Depreciation	0	0	0	0	0	
D)			Cost of leasing	0	0	0	0	0	
Evicting investments from provious		2,374	Average NBV	354	233	0	0	0	
Existing investments from previous	13,642		Depreciation	475	475	233	0	0	
reference periods (Table E)			Cost of leasing	0	0	0	0	0	
			Average NBV	618	503	398	368	513	
Total for the ANSP in RP4	48,364		Depreciation	616	679	754	548	877	
			Cost of leasing	0	0	0	0	0	

2.1 - Investments - AirNav Ireland

Complementary information may be provided in ANNEX E

2.1.1 - Investments from RP4 (000's)

Table A - Number of new major investments (i.e. above 5 M€) for RP4	6

Ref.	Name of new major investments	Total value of the asset (capex or	Value of the assets allocated to ANS in the scope of the	Elements for	the calculation of t depreciation a		costs of investme ng) (in national c u	•	lue (NBV),	Lifecycle	Planned date	Allocat	tion (%)*
#	(i.e. above 5 M€) for RP4	contractual leasing value) (in national currency)	performance plan (in national currency)		2025	2026	2027	2028	2029	(Amortisation period in years)	of entry into operation	En route*	Terminal*
				Average NBV	0	2,532	9,590	8,728	30,353				
A1	COOPANS TopSky ATC One	54,900	41,631	Depreciation	0	0	862	862	2,817	12 years	2029	75%	25%
				Cost of leasing									
				Average NBV	0	416	1,962	2,676	2,873				
A2	Radar Upgrade Phase 2	22,000	17,600	Depreciation	0	181	874	1,265	1,467	12 years	2026	75%	25%
				Cost of leasing									
				Average NBV	0	0	0	0	2,416		2020		
A3	Ballycasey Building Extension	12,200		Depreciation	0	0	0	0	98	25 years	2029	100%	0%
				Cost of leasing									
				Average NBV	0	0	0	0	2,295				
A4	ASMGCS	12,000	9,600	Depreciation	0	0	0	0	480		2029	0%	100%
				Cost of leasing									
				Average NBV	0	465	1,753	1,585	1,417	8 years for			
A5	CASDS	9,500	7,600	Depreciation	0	168	671	671	671	simulators, 12	2026	75%	25%
				Cost of leasing						years for			
				Average NBV	0	0	0	5,850	5,610				
A6	Dublin ATC Building Extension	7,500		Depreciation	0	0	0	240	240	25 years	2028	75%	25%
				Cost of leasing									
Subte	otal of new major investments from			Average NBV	0	3,413	13,305	18,839	44,964				
RP4		118,100		Depreciation	0	349	2,408	3,038	5,773				
				Cost of leasing	0	0	0	0	0				

^{*} En route/Terminal allocation within the scope of the Regulation. The total % En route+terminal should be equal to 100%.

Table B - Other new investments (below 5M€) from RP4

	asset (capex or	the scope of the	Elements for	Elements for the calculation of the determined costs of investments (net book value (NBV), depreciation and cost of leasing) (in national currency)							Allocation (%)*	
value) (in n	value) (in national currency)	ional performance plan (in national		2025	2026	2027	2028	2029	'	of entry into operation	En route*	Terminal*
Subtotal of other new investments from			Average NBV	35,548	51,558	71,294	78,243	86,796				
RP4	93,253	74,602	Depreciation	3,397	4,947	6,008	6,601	7,510			70%	30%

Cost of lossing		
Cost of leasing		

^{*} En route/Terminal allocation within the scope of the Regulation. The total % En route+terminal should be equal to 100%.

2.1.2 - Investments from RP3 (000's)

Table C - Number of major investments (i.e. above 5 M€) from RP3 performance plan

Ref.	Name of major investments (i.e.	Total value of the asset (capex or	Value of the assets allocated to ANS in the scope of the	Elements for	the calculation of the depreciation a		costs of investmeng) (in national cu	•	lue (NBV),	Lifecycle	Planned date	Allocati	ion (%)*
#	above 5 M€) stemming from RP3 performance plan	contractual leasing value) (in national currency)	performance plan (in national currency)		2025	2026	2027	2028	2029	(Amortisation period in years)	of entry into operation	En route*	Terminal*
				Average NBV	4,751	3,863	2,976	2,088	1,200				
C1	COOPANS Builds 3.6 to 3.8 budget	8,000	6,400	Depreciation	888	888	888	888	888	8 years	2021-2023	75%	25%
				Cost of leasing									
				Average NBV	2,357	2,191	2,026	1,860	1,695				
C2	New Dublin Radar 2 Replacement	5,000	4,000	Depreciation	165	165	165	165	165	15 years	2022	75%	25%
				Cost of leasing									
				Average NBV	4,210	6,458	5,952	5,365	4,778				
С3	NAVAIDS replacement program	9,000	7,200	Depreciation	263	425	587	587	587	12 years	2021-2024	0%	100%
				Cost of leasing									
				Average NBV	33,100	32,189	31,278	30,367	29,456				
C4	Dublin Tower - Building	36,391	36,391	Depreciation	911	911	911	911	911	40 years	2021	0%	100%
	_			Cost of leasing						·			
				Average NBV	6,939	6,006	4,706	3,406	2,164				
C5	Dublin Tower - Equipment	13,466		Depreciation	1,267	1,300	1,300	1,300	1,184	-	2021	0%	100%
			·	Cost of leasing	·				· · · · · · · · · · · · · · · · · · ·	<u>'</u>			
				Average NBV	2,360	4,754	4,136	4,564	3,737	,			
C6	COOPANS 2019 Roadmap Builds	8,000		Depreciation	290	521	715	828	828	-	2023-2024	75%	25%
	·		·	Cost of leasing						<u>'</u>			
				Average NBV	4,274	4,153	4,033	3,912	3,791	Building 40			
C7	New En Route Contingency Centre	12,255		Depreciation	516	516	516	483	121	_		100%	0%
	at Ballygireen	ĺ	Í	Cost of leasing						systems 12			
				Average NBV	851	792	733	675	616				
C8	Plant upgrade works	7,169		Depreciation	59	59	59	59	59	-	2023	71%	29%
		,,,,,,	,,,,,,	Cost of leasing	33	33		33		- ,			
				Average NBV									
C9	Emergency Air Situation Display	6,500		Depreciation	0	0	0	0	0	20 years	2021-2024	75%	25%
	System (EASDS) Replacement	0,555	3,200	Cost of leasing	0		-			20 , ca. s			
				Average NBV	436	404	371	339	306				
C10	Climate Action Plan (Sustainability	5,000		Depreciation	33	33	33	33	33	_	2021-2024	75%	25%
020	Management Plan)	3,000		Cost of leasing	33	33	33	33		15 , ca. 5			
				Average NBV	59,278	60,811	56,211	52,576	47,743				
	otal of major investments from RP3	110,781		Depreciation	4,392	4,818	5,174	5,254	4,775				
perfo	rmance plan			Cost of leasing	0	0	0	0					

^{*} En route/Terminal allocation within the scope of the Regulation. The total % En route+terminal should be equal to 100%.

Table D - Number of major investments (i.e. above 5 M€) added during RP3	0
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2.1.3 - Existing investments from previous reference periods (000's)

Table E - Existing investments from previous RPs

		asset (capex or	Value of the assets allocated to ANS in the scope of the	Licincints for	depreciation and cost of leasing) (in national currency)								ion (%)*
	contractual leasing value) (in national currency)	performance plan (in national currency)		2025	2026	2027	2028	2029	(Amortisation period in years)	of entry into operation	En route*	Terminal*	
CI	htatal of existing investments from			Average NBV	41,761	40,394	44,741	48,532	26,731				
	ubtotal of existing investments from 7,844 revious RPs	6,275	6,275 Depreciation	4,541	3,974	3,041	2,459	1,560			73%	27%	
pre			Cost of leasing										

^{*} En route/Terminal allocation within the scope of the Regulation. The total % En route+terminal should be equal to 100%.

2.1.4 - Detail of new major investments for RP4 from table A (000's)

NOTE: Section 1.3 (Stakeholder Consultation) should include details on the consultation with airspace users' representatives on new major investments.

Name of new major investment 1 COOPANS TopSky	ATC One		Reference #	A1	Total value of t	ne asset	54,900					
Main category of the investment		New ATM system	Overhaul of existing ATM system	Other ATM	CNS	Infrastructure	Ancilliary	Other				
			X									
		The COOPANS To	oSky ATC One platform will replace	the existing CO	OPANS ATM plat	form and associa	ited software an	d hardware.				
Description of the asset		This major system	upgrade is required due to obsole	scence, and to e	nsure COOPANS	members transit	tion towards the	Digital				
		European Sky.										
Is the investment mandated by a SES Regulation (i.e.		Yes, this investme	Yes, this investment is partially required for CP1 compliance and in particular in relation to AF5 and AF6.									
PCP/CP1/Interoperability)?	Yes											
If yes please provide description/reference												
systems, information on the consistency of the investme European ATM Master Plan	ent with the	Master Plan and the DES initiative. These initiatives aim to harmonize and enhance air traffic management across Europe, leveraging digital technologies to improve efficiency, safety, and sustainability in aviation operations.										
Level of impact of the investment	Local level	Yes										
	Local level		fety Enviro	onment	Can	acity	Cost Eff	iciency				
Quantitative impact per KPA				ificant		ajor	Ma	-				
Benefits for airspace users and results of the consultation users' representatives	Stakeholders supported this proposal during the RP4 Consultation Meeting. It ensures full compliance with CP1 AF5 and AF6, and introduces automation and other efficiencies. For full detail of the intended deliverables under the heading of each KPA, please refer to the appendix to the IAA's Draft Decision document, as well as AirNav Ireland's Business Plan submission.											
Joint investment / partnership	Yes	1 ' '	ide reference to joint project and/ -border initiatives	or indicate	This is a joint Co	OOPANS Alliance	project.					

Name of new major investment 2 Radar Upgrade Ph	ase 2		Referen	ce # A2	Total value of t	he asset	22,000			
Main category of the investment		New ATM system	Overhaul of existing ATM s	system Other ATM	CNS	Infrastructure	Ancilliary	Other		
					Х	Х				
Description of the asset			The upgrade of the remaining four radar sites (Shannon, Cork, Dublin Radar 3, Mount Gabriel 2) to RSM 970 NG models, including the three combined airport radars. The radar subsystems, such as radar antennas, radomes and ancillaries at all 8 radar sites will addressed.							
Is the investment mandated by a SES Regulation (i.e.										
PCP/CP1/Interoperability)?	No									
If yes please provide description/reference										
For investments in new ATM systems and major overhau	uls of ATM									
systems, information on the consistency of the investme	ent with the									
European ATM Master Plan										
Level of impact of the investment	Network level	Yes								
Level of impact of the investment	Local level	Yes								
Quantitative impact per KPA		Saf	ety	Environment	Cap	acity	Cost Eff	iciency		
Quantitative impact per KFA		Ma	ijor	Significant	Sign	ficant	Signifi	icant		
Results of the consultation of airspace users' representa	This project was outlined in the consultation material. It was not the subject of any substantive submissions from airspace users' representatives.									
Joint investment / partnership	No	If yes, please prov reference to cross	ide reference to joint proje -border initiatives	ct and/or indicate						

Name of new major investment 3 Ballycasey Building	g Extension		Ref	ference #	A3	Total value of tl	ne asset		12,200			
Main category of the investment		New ATM system	Overhaul of existing A	ATM system	Other ATM	CNS	Infrastructure	Ancilliary	Other			
							X					
Description of the asset		intended to addre	Expansion of the Ballycasey Area Control Centre building, which opened in 2004, due to current space limitations. The project is intended to address space requirements for increased staffing numbers (the requirement for which has been outlined elsewhere) and new operational equipment installations. The new space will aim to utilise existing infrastructure by expansion of equipment cabinets into adjacent rooms which necessitates providing new space for support services and staff.									
Is the investment mandated by a SES Regulation (i.e. PCP/CP1/Interoperability)? If yes please provide description/reference	No											
For investments in new ATM systems and major overhal systems, information on the consistency of the investment European ATM Master Plan												
Level of impact of the investment	Network level	Yes										
Level of impact of the investment	Local level	Yes										
Quantitative impact per KPA			fety geable		nment geable	· ·	acity ficant	Cost Effi Signifi				
Results of the consultation of airspace users' representa	This project was o representatives.	outlined in the consulta	tion material	. It was not the	subject of any su	ıbstantive submi	ssions from airsp	pace users'				

Joint investment / partnership	No I	If yes, please provide reference to joint project and/or indicate reference to cross-border initiatives	
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Name of new major investment 4 ASMGCS			R	eference #	A4	Total value of th	ne asset		12,000		
Main category of the investment		New ATM system	Overhaul of existing	ATM system	Other ATM	CNS	Infrastructure	Ancilliary	Other		
		Х					Х				
Description of the asset		and surveillance fo	Advanced Surface Movements and Guidance Control System (ASMGCS) is a system used at airports to provide routing, guidance and surveillance for the control of aircraft and vehicles. This project is to deliver the infrastructure and technology to provide A-SMGCS at Cork and Shannon Airports (it is already in place at Dublin Airport).								
Is the investment mandated by a SES Regulation (i.e.		This investment is recommended as best practice by EUROCONTROL/EASA.									
PCP/CP1/Interoperability)?	No										
If yes please provide description/reference											
For investments in new ATM systems and major overhal systems, information on the consistency of the investme European ATM Master Plan	This project aligns taxiways and runv	with one of the Strat vays.	egic Objective	s in the update	d Master Plan SD	O#1: Alert for re	duction of collisi	ion risks on			
Level of impact of the investment	Network level	No									
Level of impact of the investment	Local level	Yes									
Quantitative impact per KPA		Saf	fety	Enviro	nment	Сар	acity	Cost Eff	iciency		
Quantitative impact per KPA		Ma	ajor	Neglig	geable	Signi	ficant	Neglig	eable		
Results of the consultation of airspace users' representa	tives	It is recognised that this investment is recommended as best practice by EUROCONTROL / EASA. It is also pertinent in light of the critical incident at Haneda Airport in January 2024.									
Joint investment / partnership Yes If yes, please provide reference to joint project and/or indicate reference to cross-border initiatives This will be a joint initiative with the aerodrom who will need to invest separately in the airfiel and to ensure compatible vehicles.							ly in the airfield	•			

Name of new major investment 5 CASDS			Refe	erence #	A5	Total value of tl	ne asset		9,500	
Main category of the investment		New ATM system	Overhaul of existing A	TM system	Other ATM	CNS	Infrastructure	Ancilliary	Other	
		X	Х							
Description of the asset		This project provides for the replacement of the current Emergency Air Situation Display System (EASDS), which was introduced into operational service in 2008. It is used as a contingency Air Traffic Control (ATC) system in the event of a major failure of the COOPANS system.								
Is the investment mandated by a SES Regulation (i.e. PCP/CP1/Interoperability)? If yes please provide description/reference	No									
For investments in new ATM systems and major overha systems, information on the consistency of the investm European ATM Master Plan										
Level of impact of the investment	Network level Local level									
Quantitative impact per KPA		fety ajor	Enviror Maj		<u> </u>	acity ajor	Cost Effi Maj	-		

Results of the consultation of airspace users' representat	tives	This project was outlined in the consultation material, but was not th representatives. AirNav Ireland referred to the several hour long ATN had estimated the cost to the industry in the region of €100m. AirNav such events, and therefore represents 'considerable value for money	If system outage experienced by NATS in 2023, and that IATA or Ireland said that this investment will go a long way to avoid
Joint investment / partnership	No	If yes, please provide reference to joint project and/or indicate reference to cross-border initiatives	

Name of new major investment 6 Dublin ATC Buildin	ng Extension			Reference #	A6	Total value of t	he asset		7,500	
Main category of the investment		New ATM system	Overhaul of existi	ng ATM system	Other ATM	CNS	Infrastructure	Ancilliary	Other	
						X				
Description of the asset		be determined) du elsewhere in the p existing equipmen	This project provides for the construction of an extension to the existing ACC building, or a separate block (final solution remains to be determined) due to current space limitations, again in the context of the intended increase in operational staffing levels outlined elsewhere in the performance plan documentation. The new space is to consist of strategic parts stores, relocation of TCD from existing equipment room, office accommodation and training rooms for new incoming engineering staff, canteen facilities for increased site numbers.							
Is the investment mandated by a SES Regulation (i.e.										
PCP/CP1/Interoperability)?	No									
If yes please provide description/reference										
For investments in new ATM systems and major overha	uls of ATM									
systems, information on the consistency of the investment	ent with the									
European ATM Master Plan										
Level of impact of the investment	Network level	No								
Level of impact of the investment	Local level	Yes								
Quantitative impact per KPA	•	Saf	ety	Enviro	nment	Сар	acity	Cost Effi	iciency	
Quantitative impact per KPA		Neglig	geable	N/	'A	Signi	ficant	Neglige	eable	
Results of the consultation of airspace users' representa	atives	This project was outlined in the consultation material. It was not the subject of any substantive submissions from airspace users' representatives.								
Joint investment / partnership	No	If yes, please provide reference to joint project and/or indicate reference to cross-border initiatives								

2.1.5 - Details on other new investments for RP4 from table B

Overall description and justification of the costs nature and benefits of other new and existing investments in fixed assets planned over the reference period

Detail of other new investments (as well as further detail on the major investments outlined above) is outlined in sections 6 and appendix 1 of the IAA's Draft Decision and Final Decision documents, the appendices to AirNav Ireland's Business Plan submission, as well the 'AirNav Capex (IAA)' tab of the Performance Plan financial model.

		Master	Total value of the	Value of the assets allocated to ANS in	Elements for the calculation of the determined costs of investments (net book value (NBV), depreciation and cost of leasing) (in national currency)	
Ref	Name of other new	Plan	asset (capex or	the scope of the	depreciation and cost of leasing) (in national currency)	

#	investments for RP4	reference (if any)	contractual leasing value) (in national currency)	performance plan (in national currency)		2025	2026	2027	2028	2029	Description
					Average NBV						
B1					Depreciation						
					Cost of leasing						
					Average NBV						
B2					Depreciation						
					Cost of leasing						
					Average NBV						
В3					Depreciation						
					Cost of leasing						
					Average NBV						
B4					Depreciation						
					Cost of leasing						
					Average NBV						
B5					Depreciation						
					Cost of leasing						
					Average NBV						
В6					Depreciation						
					Cost of leasing						
					Average NBV						
В7					Depreciation						
					Cost of leasing						
					Average NBV						
B8					Depreciation						
					Cost of leasing						
					Average NBV						
В9					Depreciation						_
					Cost of leasing						
					Average NBV						
B10					Depreciation						
					Cost of leasing						

2.2 - Investments - Met Éireann Aviation Services Division (ASD)

Complementary information may be provided in **ANNEX E**

2.2.1 - Investments from RP4 (000's)

Table A - Number of new major investments (i.e. above 5 M€) for RP4	0
	•

Table B - Other new investments (below 5M€) from RP4

	Total value of the asset (capex or contractual leasing value) (in national currency)	Value of the assets allocated to ANS in the scope of the		Elements for the calculation of the determined costs of investments (net book value (NBV), depreciation and cost of leasing) (in national currency)					Lifecycle	Planned date		
		performance plan (in national currency)		2025	2026	2027	2028	2029	(Amortisation period in years)	of entry into operation	En route*	Terminal*
Subtotal of other new investments from RP4			Average NBV	264	270	398	368	513				
			Depreciation	142	204	521	548	877			80%	20%
			Cost of leasing	0	0	0	0	0				

^{*} En route/Terminal allocation within the scope of the Regulation. The total % En route+terminal should be equal to 100%.

2.2.2 - Investments from RP3

Table C - Number of major investments (i.e. above 5 M€) from RP3 performance plan	0
Table D. Normbor of major investments (i.e. about 5 866) added during DD2	
Table D - Number of major investments (i.e. above 5 M€) added during RP3	U

2.2.3 - Existing investments from previous reference periods (000's)

Table E - Existing investments from previous RPs

	asset (capex or	Value of the assets allocated to ANS in		Lifonyala		Allocation (%)*						
		the scope of the		2025	2026	2027	2028	2029	Lifecycle (Amortisation period in years)	Planned date of entry into operation	En route*	Terminal*
Subtotal of existing investments from previous RPs		13,642 2,374	Average NBV	354	233	0	0	0				
			Depreciation	475	475	233	0	0			80%	20%
			Cost of leasing	0	0	0	0	0				

^{*} En route/Terminal allocation within the scope of the Regulation. The total % En route+terminal should be equal to 100%.

2.2.4 - Detail of new major investments for RP4 from table A

Not applicable

2.2.5 - Details on other new investments for RP4 from table B (000's)

Overall description and justification of the costs nature and benefits of other new and existing investments in fixed assets planned over the reference period

A number of capital investment projects are planned for the coming years in the context of the SES and ICAO regulatory frameworks and with the intention of improving quality of service. While some of the capital projects are focused specifically on supporting aeronautical meteorological functions, others are cross cutting with planned investments intended to also support Met Éireann activities along with the aviation functions.

Re	f. Name of other new	Master Plan	Total value of the asset (capex or	Value of the assets allocated to ANS in the scope of the		the calculation of t	he determined cand cost of leasin					
#		reference (if any)	contractual leasing value) (in national currency)	performance plan (in national currency)		2025	2026	2027	2028	2029	Description	
					Average NBV	120		60	30		This project, originally part of the METCOM project, will	
					Depreciation	30	30	30	30	30	allow aviation users of Met Éireann's meteorological	
В	Met Self Briefing Upgrade		150	1	Cost of leasing	0	0	0	0		services to more readily access bespoke regulated data in a user-friendly configurable environment.	
					Average NBV	312	299	1,207	1,803	2,37	The Met Éireann RADAR network will be upgraded from its	
					Depreciation	13	13	51	78	10	current 2 sites to 6 sites which will significantly increase the	
В	2 RADAR Upgrades		19,230		Cost of leasing	0	0	0	0		domain covered within the Shannon FIR and provide ATS with the capability, through implementation of aviation specific software modules, to overlay RADAR data onto ATM workstations hence improving both situational awareness and decision making by ATCOs.	
					Average NBV	413	367	321	275	22:	The METCOM project will upgrade aviation messaging	
В	метсом		1,860	458	Depreciation	46	46	46	46	4	systems to ensure regulatory compliance and enable	
					Cost of leasing	0	0	0	0	(compliance with CP1.	
					Average NBV	0	438	375	313	250	Investment in additional visibility observing sites in the	
					Depreciation	0	63	63	63	6	vicinity of the major airports will provide the aviation	
В	4 AUTO OBS		500	1	Cost of leasing	0	0	0	0		observers and forecast teams of early warning of degenerating visibility and cloud ceiling conditions through the deployment of visual aid sensors.	
					Average NBV	242	0	0	0		This is a carryover project from RP3. In order to strengthen	
					Depreciation	242	242	0	0		Business Continuity in Met Éireann, there was a	

B5	IMaMS	6,960	1,210	Cost of leasing	0	0	0	0	0	requirement for ICT Geo-resilience in conjunction with a Business Continuity Management (BCM) operational office. This required an ICT solution to enable diversification and replication across two ICT sites in order to facilitate DR and meet Recovery Time Objectives and Recovery Point Objectives for products and services.
				Average NBV	0	0	1,114	835	557	This is a continuation of the IMaMs project and provides
				Depreciation	0			278		consisten Business Continuity for Met ASD. This phase will
В6	IMaMS 2	8,000	1,392	Cost of leasing	0	0	0	0	0	take over from IMaMS and ensure no gap in cover.
				Average NBV	466	233	0	0	0	This is a carryover project from RP3. The implementation of
				Depreciation	233	233	233	0	0	HPC by Met Éireann is required in order to develop capacity
B7	HPC 1	6,690	1,163	Cost of leasing	0	0	0	0	0	to enable developments in forecast services such as nowcasting and the use of high resolution ensemble forecasts for the TMA. The improved forecasting capability will also support improvements to forecast services relating to high impact and extreme weather and support safety and efficiency in airport management and ATM.
				Average NBV	0	0	0	0	1 210	This is a new project for RP4 and consists of a continuation
				Depreciation	0		_	0		of the HPC1. HPC capacity is being developed in
В8	HPC 2	8,690	1,512	·	0	0	0	0		collaboration with other modern European Meteorological Services to ensure value for money and to optimise the investment potential.
				Average NBV	211	158	106	53	0	The purpose of this project is to procure and enter into a
				Depreciation	53	53	53	53		new contract for a Meteorological Data Visualisation and
В9	MET Data Visualisation Project	800	264	Cost of leasing	0	0	0	0	0	Production System. Such a system is a core requirement of the Forecasting Division, and it would not be possible to produce quality forecasts, including aviation forecasts, without such a system.
				Average NBV						
B10)			Depreciation						
				Cost of leasing						

3.1 - Safety targets

3.1.1 - Safety KPI #1: Level of Effectiveness of Safety Management achieved by ANSPs

3.2 - Environment targets

3.2.1 - Environment KPI #1: Horizontal en route flight efficiency (KEA)

3.3 - Capacity targets

- 3.3.1 Capacity KPI #1: En route ATFM delay per flight
- 3.3.2 Capacity KPI #2: Terminal and airport ANS ATFM arrival delay per flight
- 3.3.3 ATCO Planning

3.4 - Cost-efficiency targets

3.4.1 - Cost-efficiency KPI #1: Determined unit cost (DUC) for en route ANS

En Route Charging Zone #x

3.4.2 - Cost-efficiency KPI #2: Determined unit cost (DUC) for terminal ANS

Terminal Charging Zone #x

3.4.3 - Cost allocation ATSP/CNSP

ATSP/CNSP #x

3.4.4 - Cost allocation METSP

MFTSP #x

- 3.4.5 Cost allocation NSA
- 3.4.6 Determined costs assumptions

ANSP #x

- 3.4.7 Pension assumptions
- 3.4.8 Interest rate assumptions for loans financing the provision of air navigation services
- 3.4.9 Additional determined costs related to measures necessary to achieve the en route capacity targets
- 3.4.10 Restructuring costs

3.5 - Additional KPIs / Targets

3.6 - Description of KPAs interdependencies and trade-offs including the assumptions used to assess those trade-offs

- 3.6.1 Interdependencies and trade-offs between safety and other KPAs
- 3.6.2 Interdependencies and trade-offs between capacity and environment
- 3.6.3 Interdependencies and trade-offs between cost-efficiency and capacity
- 3.6.4 Other interdependencies and trade-offs

Annexes of relevance to this section

ANNEX A. REPORTING TABLES & ADDITIONAL INFORMATION (EN-ROUTE)

ANNEX B. REPORTING TABLES & ADDITIONAL INFORMATION (TERMINAL)

ANNEX F. BASELINE VALUES (COST-EFFICIENCY)

ANNEX H. RESTRUCTURING MEASURES AND COSTS

ANNEX M. COST ALLOCATION

ANNEX J. OPTIONAL KPIS AND TARGETS

ANNEX O. JUSTIFICATIONS FOR THE LOCAL SAFETY TARGETS

ANNEX P. JUSTIFICATIONS FOR THE LOCAL ENVIRONMENT TARGETS

ANNEX Q. JUSTIFICATIONS FOR THE LOCAL CAPACITY TARGETS

ANNEX R. JUSTIFICATIONS FOR THE LOCAL COST-EFFICIENCY TARGETS

ANNEX U. VERIFICATION BY THE NSA OF THE COMPLIANCE OF THE COST BASE

SECTION 3.1: SAFETY KPA

3.1 - Safety targets

- 3.1.1 Safety KPI #1: Level of Effectiveness of Safety Management achieved by ANSPs
 - a) Safety national performance targets
 - b) Justifications for the local safety performance targets
 - c) Main measures put in place to achieve the safety performance targets

Annexes of relevance to this section

ANNEX O. JUSTIFICATIONS FOR THE LOCAL SAFETY TARGETS

3 - PERFORMANCE TARGETS AT LOCAL LEVEL

3.1 - Safety targets

3.1.1 - Safety KPI #1: Level of Effectiveness of Safety Management achieved by ANSPs

a) Safety performance targets

	Number of Air Traffic Service Providers			1		
		2025	2026	2027	2028	2029
		Target	Target	Target	Target	Target
	Safety policy and objectives	С	С	С	С	С
	Safety risk management	D	D	D	D	D
AirNav Ireland	Safety assurance	С	С	С	С	С
Allivav II elaliu	Safety promotion	С	С	С	С	С
	Safety culture	С	С	С	С	С
	Additional comments					

b) Justifications for the local safety performance targets

The RP4 Union-wide targets for the five EoSM components are unchanged from RP3. However, the methodology underlying the measurement of the KPI has been updated by EASA. The conditions to be met by ANSPs for reaching a certain target level have become more stringent in comparison to RP3. As a result, the safety performance target standards for RP4 are not directly comparable with those of RP3, and equate to an improvement in safety management.

In 2022, AirNav Ireland met the EoSM target of 'Managed' (level C) in Safety Policy and Objectives, Safety Assurance, Safety Promotion and Safety Culture. However, performance was downgraded in relation to the EoSM target for Safety Risk Management from 'Assured' (level D) to 'Managed' (level C). This target was again missed in 2023.

The IAA has set targets for AirNav Ireland which are consistent with the Union-wide targets during RP4, by ensuring EoSM that is at least 'Level D' in the objective of safety risk management and at least 'Level C' in the other safety objectives of culture, policy and objectives, promotion and assurance. These targets are set for each year of RP4, meaning that the standards are to be achieved by 2025 rather than by 2029. For further details, please refer to section 9 of the IAA's Draft Decision and Final Decision documents.

c) Main measures put in place to achieve the local safety performance targets

To assess the compliance of AirNav Ireland with the required level of safety performance, the IAA will oversee AirNav Ireland to provide assurance of the effectiveness of the level of safety management. This oversight, based on risked based principles, will include, inter alia, audits, inspections, reviews of safety performance data and reviews of changes to the functional system.

The IAA will continue to conduct an annual review of the EoSM questionnaire, based on actual outcomes each year, and impose remedial measures in any areas of under-performance.

In its RP4 Business Plan submission, AirNav Ireland has set out a detailed description of its safety management processes, safety culture, and the measures it plans to undertake in RP4 in order to ensure compliance with the required level of safety performance, including in relation to its Human Factors (Fatigue, Stress and Roster management) policy, Safety Culture, and Just Culture policy.

^{*} Refer to Annex O, if necessary.

^{*} Refer to Annex O, if necessary.

SECTION 3.2: ENVIRONMENT KPA

3.2 - Environment targets

- 3.2.1 Environment KPI #1: Horizontal en route flight efficiency (KEA)
 - a) Environment national performance targets
 - b) Justifications for the local environment performance targets
 - c) Main measures put in place to achieve the environment performance targets

Annexes of relevance to this section

ANNEX P. JUSTIFICATIONS FOR THE LOCAL ENVIRONMENT TARGETS

3.2 - Environment targets

3.2.1 - Environment KPI #1: Horizontal en route flight efficiency (KEA)

a) National environment performance targets

	2025	2026	2027	2028	2029
National reference values	1.42%	1.40%	1.38%	1.36%	1.34%
	2025	2026	2027	2028	2029
	Target	Target	Target	Target	Target
National targets	1.42%	1.40%	1.38%	1.36%	1.34%

b) Justifications for the local environment performance targets

In considering the appropriate local environment performance targets for RP4, we assessed the past performance of AirNav Ireland and the drivers of this performance. While AirNav Ireland remains one of Europe's best performers in terms of the KEA, the target was missed in 2023. We found that this was largely due to factors outside of the control of AirNav Ireland and/or as a result of measures which were network-optimal but locally sub-optimal. In that context, we carried out a further review over 2022, 2023, and 2024 to date.

In this review, we noted that prior to the UK LD1/West airspace change, which relates to the introduction of FRA in UK airspace, the KEA in 2023 was at its lowest level in the year at approximately 1.2% and broadly consistent with 2022. A sharp increase was observed from 23rd March 2023, the same day as the UK airspace change was operationalised. KEA inefficiency peaked in April at 1.6% and remained elevated for the remainder of the year, although started to trend downwards in later months. We noted that KEA performance has normalised somewhat in the opening months of 2024, although remain above 2022 levels. We assessed that this suggested the introduction of FRA in Western UK airspace continues to impose challenges in meeting KEA targets and was indeed likely a key factor behind performance exceeding target levels in 2023.

On this basis, we decided the RP4 reference values for Ireland, which are less challenging than RP3 but remain significantly below the Union-wide targets, were appropriate. Sustainably reducing the environmental impact of aviation is a key goal for Ireland, as it is across the EU. Challenging targets will drive a focus for both AirNav Ireland and the IAA to continuously assess and monitor performance. From that perspective, it is preferable to have a target which, while challenging, seeks to drive performance improvements. In that regard, the reference values appear to provide an appropriate balance between achievability/realism, and ambition, in the context of the changed operational situation related to the UK airspace change. For further details, please refer to section 10 of the IAA's Draft Decision and Final Decision documents.

c) Main measures put in place to achieve the local environment performance targets

In respect of the challenges posed by the introduction of FRA in UK airspace, AirNav Ireland has undertaken to continue to work with NATS to identify any potential improvements which may mitigate this impact. The IAA will continue to hold regular review meetings with AirNav Ireland to discuss performance trends and any potential optimisation measures.

In addition, Common Project 1 (CP1) related projects continue to support AirNav Ireland to meet environmental targets. Of the total CO2 emissions from CP1, 80% of the total savings originate from AF3 functionalities (flexible airspace management and FRA). Alongside this, savings/reductions in taxi-out time will support reductions in CO2 output, contributing to network wide targets across RP4.

^{*} Refer to Annex P, if necessary.

^{*} Refer to Annex P, if necessary.

SECTION 3.3: CAPACITY KPA

3.3 - Capacity targets

- 3.3.1 Capacity KPI #1: En route ATFM delay per flight
 - a) National capacity performance targets
 - b) Justifications for the local en route capacity performance targets
 - c) Main measures put in place to achieve the local en route capacity performance targets
- 3.3.2 Capacity KPI #2: Terminal and airport ANS ATFM arrival delay per flight
 - a) National capacity performance targets
 - b) Justifications for the local terminal capacity performance targets, including contribution to the improvement of the European ATM network performance
 - c) Main measures put in place to achieve the local terminal capacity performance targets
- 3.3.3 ATCO planning
 - a) ATCOs in the scope of the performance plan
 - b) ATCO planning at ACC level
 - c) ATCO training

Annexes of relevance to this section

ANNEX Q. JUSTIFICATIONS FOR THE LOCAL CAPACITY TARGETS

3.3 - Capacity targets

3.3.1 - Capacity KPI #1: En route ATFM delay per flight

a) National capacity performance targets

	2025	2026	2027	2028	2029
National reference values	0.08	0.06	0.05	0.03	0.03
	2025	2026	2027	2028	2029
	Target	Target	Target	Target	Target
National targets	0.03	0.03	0.02	0.02	0.02

b) Justifications for the local en route capacity performance targets

In assessing the appropriate level for En Route capacity targets for RP4, we first conducted an assessment of AirNav Ireland's performance over RP3. AirNav Ireland met all En Route service demand between 2020 and 2022 despite ATCO headcount running below the IAA's RP3 forecast for 2022. However, while still meeting the ATFM delay target, performance deteriorated markedly in 2023, with En Route ATFM delay reaching 0.02 min/flight. Furthermore, almost all of this delay was ANSP attributable.

The IAA noted that the suggested national reference values would allow for a continued and significant deterioration in performance relative to the current target, in circumstances where AirNav Ireland has still met the current target. In that context, we did not consider it appropriate to set a target for RP4 which is below the current 2024 target. We also decided to build further ambition into the target from 2027 onwards. This is linked to the year where we assess that AirNav Ireland should be capable of addressing the current under-resourcing in ATCO staffing levels, with additional resilience added to the rosters to reduce utilisation to sustainable levels. In that context, we consider it appropriate to set targets which are significantly more ambitious than the national reference values. We have set targets which are consistent with very low levels of ATFM delay, although not zero delay, the targeting of which would likely be inefficient/disproproportionate as regards the trade-off between capacity and cost. For further details, please see section 11 of the IAA's Draft Decision and Final Decision documents.

c) Main measures put in place to achieve the local en route capacity performance targets

The key measures which are to be put in place to achieve the local en route capacity targets relate to investment in the ATM systems, and in additional operational resourcing (ATCOs and engineers).

As assessed by CEPA/THINK, AirNav Ireland has already put in place a range of measures designed to enable it to provide capacity in a cost efficient manner, including multi-ratings of ATCOs, flexible airspace sectorisation in response to traffic loading rather than a fixed sector plan, and 'crew-to-workload' staffing. In addition, the ANSP has a number of other capacity related capital projects forecast for RP4, such as major investment in the ATM systems, building extensions to allow for increased test and proving facilities needed to implement new systems, and to allow classroom capacity to deliver the future ATC service, along with additional projects related to obsolescence which will ensure current levels of capacity are maintained. The NSA will monitor the implementation of these initiatives and will work to ensure sufficient measures are taken to comply with the performance targets.

In the cost allowances for RP4, the NSA has accordingly accounted for the requirement for additional ATCOs and engineers, as well as an increase in the forecast level of capital expenditure, aimed to facilitate the ANSP in achieving the targets as traffic grows. This is discussed further elsewhere in the Performance Plan documentation. The NSA has also put in place an incentive scheme designed to create an appropriately sharp and weighty incentive on the ANSP to achieve this target, as set out in the relevant tab and the consultation and decision documents.

^{*} Refer to Annex Q, if necessary.

^{*} Refer to Annex Q, if necessary.

a) National capacity performance targets

National targets 0.2 0.2 0.2 0.2 0.2 0.2 0.2 0.2 0.2 0.		2025	2026	2027	2028	2029
The National targets remain unchanged from RP3. However, the parameters for the Terminal capacity incentive scheme are adjusted to make it more effectively Additional comments targeted towards CRSTMP delay, while modulating downwards the pivot values.		Target	Target	Target	Target	Target
Terminal capacity incentive scheme are adjusted to make it more effectively Additional comments targeted towards CRSTMP delay, while modulating downwards the pivot values.	National targets	0.2	0.2	0.2	0.2	0.2
		Terminal capacit targeted toward	y incentive scher s CRSTMP delay,	ne are adjusted to while modulating	o make it more e	ffectively

	EIDW-Dublin	0.25	0.25	0.25	0.25	0.25			
	Airport contribution to national targets								
Airport level	EICK-Cork	0.00	0.00	0.00	0.00	0.00			
All port level	Airport contribution to national targets								
	EINN-Shannon	0.00	0.00	0.00	0.00	0.00			
	Airport contribution to national targets								

b) Justifications for the local terminal capacity performance targets, including contribution to the improvement of the European ATM network performance

In assessing the appropriate level for Terminal capacity targets for RP4, we assessed AirNav Ireland's performance over RP3, and also carried out a benchmarking analysis of performance relative to all other european airports with more than 80k annual movements. AirNav Ireland did not meet the target in 2023, although much of the arrival ATFM delay was weather related. Our benchmarking analysis showed that AirNav performs well against the comparator sample.

We concluded that there is little scope to further lower the targets from RP3. Equally, notwithstanding that AirNav Ireland did not meet the target in 2023, this alone does not provide a justification for less stringent targets, particularly given that the cost forecasts are based on an assumption of AirNav Ireland addressing the current under-resourcing in ATCO staffing levels, with additional resilience added to the rosters to reduce utilisation to sustainable levels. We have thus set targets which are consistent with those of RP3, consistent with very low levels of ATFM delay, although not zero delay, the targeting of which would likely be inefficient/disproproportionate as regards the trade-off between capacity and cost. For further details, please see section 11 of the IAA's Draft Decision and Final Decision documents.

c) Main measures put in place to achieve the local terminal capacity performance targets

The key measures which are to be put in place to achieve the local terminal capacity targets relate to investment in the ATM systems, and in additional operational resourcing (ATCOs and engineers). Unlike En Route, it is notable that a significant degree of arrival ATFM delay is typically outside the control of AirNav Ireland, and so, to a certain extent, whether the target is achieved is less within the control of AirNav Ireland.

AirNav Ireland has already put in place a range of measures designed to enable it to provide capacity in a cost efficient manner, including multi-ratings of ATCOs, flexible airspace sectorisation in response to traffic loading rather than a fixed sector plan, and 'crew-to-workload' staffing. In addition, the ANSP has a number of capacity related capital projects forecast for RP4, such as major investment in the ATM systems building extensions to allow for increased test and proving facilities needed to implement new systems, and to allow classroom capacity to deliver the future ATC service, along with additional projects related to obsolescence which will ensure current levels of capacity are maintained. The NSA will monitor the implementation of these initiatives and will work to ensure sufficient measures are taken to comply with the performance targets.

In the cost allowances for RP4, the NSA has accordingly accounted for the requirement for additional ATCOs and engineers, as well as an increase in the forecast level of capital expenditure, aimed to facilitate the ANSP in achieving the targets as traffic grows. This is discussed further elsewhere in the Performance Plan documentation. The NSA has also put in place an incentive scheme designed to create an incentive on the ANSP to achieve this target, as set out in the relevant tab and the consultation and decision documents.

^{*} Refer to Annex Q, if necessary.

^{*} Refer to Annex Q, if necessary.

3.3.3 - ATCO planning and training

AirNav Ireland

ANSP

a) ATCOs in the scope of the performance plan

ATCOs in the scope of the performance plan	Actual	Forecast						
Arcos in the scope of the performance plan		2023	2024	2025	2026	2027	2028	2029
Number of ATCO in OPS (year-end FTEs) employed by	ACC	N/A, ATCO	are forecas	t by charging	zone rather	than by posi	tion. See cos	st allocation
the ANSP (for services within the scope of the	APP	section.						
performance plan)	TWR	1						
Number of ATCOs in OPS (year-end FTEs) allocated to the	en route	248	250	255	270	274	286	288
cost base(s)								
Number of ATCO on other duties (year-end FTEs) employ	ed by the	9	9	15	15	15	15	15

b) ATCO planning at ACC level

	Actual	Forecast	Planned				
Dublin (EIDW ACC)	2023	2024	2025	2026	2027	2028	2029
Number of additional ATCOs in OPS planned to start working in the	0	4	5	6	2	5	2
OPS room (FTEs)	U	4	3	0	3	5	3
Number of ATCOs in OPS planned to stop working in the OPS room	0	4	4	2	2	2	
(FTEs)	U	4	4				4
Number of ATCOs in OPS planned to be operational at year-end	54	54	55	58	59	61	62
(FTEs)) 34	54	33	58	39	01	62

	Actual	Forecast	Planned				
Shannon (EISN ACC)	2023	2024	2025	2026	2027	2028	2029
Number of additional ATCOs in OPS planned to start working in the	0	16	17	20	12	18	10
OPS room (FTEs)	U	10	17	20	12	10	10
Number of ATCOs in OPS planned to stop working in the OPS room	0	14	13	9		۵	
(FTEs)	U	14	13	9	0	9	•
Number of ATCOs in OPS planned to be operational at year-end	194	195	200	211	214	223	225
(FTEs)	154	133	200	211	214	223	223

Additional comments

Note that the NSA's En-Route ATCO staffing forecasts are not specifically allocated to either EIDW ACC or EISN ACC locations. The actual staffing decisions remain at the operational discretion of AirNav Ireland.

c) ATCO Training

ATCO trainees of the ANSP		Forecast	Planned						
ATCO trainees of the ANSP	2023	2024	2025	2026	2027	2028	2029		
Number of trainees planned to enter the training	29	29	34	21	33	19	16		
program(s) during the year.	29	29	34	21	33	19	16		
Number of trainees expected to complete the training									
program(s) during the year based on statistical	N/A	20	20	24	15	23	13		
estimates.									
Number ATCO trainees at year end.	29	29	34	21	33	19	16		

Description of the training process, including details on the average failure rate and the process used to allocate newly qualified ATCOs between ACC, APP and TWR positions.

The calculations are based on a 70% pass rate. As the course length is between 1 and 2 years, we have assumed that all first year trainees are the 'number of trainees planned to enter the training programs during the year' and the 'number of ATCO trainees at year end' are the number of ATCO trainees in the first year of training. Operational decisions as regards the allocation of ATCOs to the various control centres is a matter for AirNav Ireland, based on need. ATCOs are typically multi-rated and assigned to locations, rather than being limited to being assigned to ACC, APP, or TWR positions. In some cases, for example, ATCOs at the Dublin control centre are licensed for all three of ACC, APP, and TWR positions, which is intended to allow for the provision of flexible, scalable, and cost effective capacity.

SECTION 3.4: COST-EFFICIENCY KPA

3.4 - Cost-efficiency targets

3.4.1 - Cost-efficiency KPI #1: Determined unit cost (DUC) for en route ANS

En Route Charging Zone #x

- a) RP4 cost-efficiency performance targets
- b) Information on the baseline values for the determined costs and the determined unit costs
- c) Detailed justifications for the adjustments to the baseline values
- d) Justification of the consistency of the local cost-efficiency performance targets with the Union-wide targets
- e) Where a deviation from the Union-wide performance targets is observed, please indicate if the NSA considers those deviations to be necessary and proportionate
- f) Main measures put in place to achieve the targets for determined unit cost (DUC) for en route ANS
- g) Verification by the NSA

3.4.2 - Cost-efficiency KPI #2: Determined unit cost (DUC) for terminal ANS

Terminal Charging Zone #x

- a) RP4 cost-efficiency performance targets
- b) Information on the baseline values for the determined costs and the determined unit costs
- c) Detailed justifications for the adjustments to the baseline values
- d) Justifications for the local terminal cost-efficiency performance targets, including contribution to the improvement of the
- e) Main measures put in place to achieve the targets for determined unit cost (DUC) for terminal ANS
- f) Verification by the NSA

3.4.3 - Cost Allocation ATSP/CNSP

ATSP/CNSP #x

- a) Summary of services provided
- b) Allocation of costs by segment
- c) Allocation of costs related to the provision of approach services
- d) Description of other services and activities outside the scope of the performance plan and their financing
- e) Changes in cost allocation
- methodology
- f) Verification by the NSA

3.4.4 - Cost Allocation METSP

METSP #x

- a) Summary of services provided
- b) Allocation of costs by segment
- c) Breakdown of determined meteorological costs between direct and core costs and allocation between en route and terminal services
- d) Meteorological direct costs and allocation across charging zone(s)
- e) Meteorological core costs and allocation across charging zone(s)
- f) Changes in cost allocation methodology
- g) Verification by the NSA

3.4.5 - Cost allocation NSA

- a) Supervision costs
- b) Search and rescue costs (if reported as part of the NSA costs)
- c) Changes in cost allocation methodology
- d) Verification by the NSA

3.4.6 - Determined costs assumptions

ANSP #x

- 3.4.6.1 Operating costs
- 3.4.6.2 Capital costs
- 3.4.6.3 Costs for VFR exempted flights
- 3.4.6.4 NSA verification
- 3.4.7 Pension assumptions
 - 3.4.7.1 Total pension costs
 - 3.4.7.2 Assumptions for the "State" pension scheme
 - 3.4.7.3 Assumptions for the occupational "Defined contributions" pension scheme
 - 3.4.7.4 Assumptions for the occupational "Defined benefits" pension scheme
- ${\it 3.4.8-Interest\ rate\ assumptions\ for\ loans\ financing\ the\ provision\ of\ air\ navigation\ services}$
- 3.4.9 Additional determined costs related to measures necessary to achieve the en route capacity targets
 - a) Overall description of the measures necessary to achieve the en-route capacity targets for RP4, which induce additional costs

- b) Detailed information on the additional costs of measures necessary to achieve the capacity targets for RP4
- c) Detailed information on the additional costs of measures necessary to achieve the capacity targets for RP4 by nature by ANSP
- d) Demonstration that the deviation from the Union-wide targets is exclusively due to the additional determined costs related to measures necessary to achieve the performance targets in capacity
- 3.4.10 Restructuring costs
 - 3.4.10.1 Restructuring costs from previous reference periods to be recovered in RP4
 - 3.4.10.2 Restructuring costs planned for RP4

Annexes of relevance to this section

ANNEX A. REPORTING TABLES & ADDITIONAL INFORMATION (EN-ROUTE)

ANNEX B. REPORTING TABLES & ADDITIONAL INFORMATION (TERMINAL)

ANNEX F. BASELINE VALUES (COST-EFFICIENCY)

ANNEX H. RESTRUCTURING MEASURES AND COSTS

ANNEX M. COST ALLOCATION

ANNEX R. JUSTIFICATIONS FOR THE LOCAL COST-EFFICIENCY TARGETS

ANNEX U. VERIFICATION BY THE NSA OF THE COMPLIANCE OF THE COST BASE

3.4 - Cost-efficiency targets

3.4.1 - Cost-efficiency KPI #1: Determined unit cost (DUC) for en route ANS

En Route Charging Zone #1 - Ireland

a) RP4 cost-efficiency performance targets

En route charging zone	Baseline 2019	Baseline 2024		RP4 cost-efficie		2029D vs. 2019B	2029D vs. 2024B		
Name of the CZ	2019 B	2024 B	2025 D	2026 D	2027 D	2028 D	2029 D	(CAGR)	(CAGR)
Total en route costs in nominal terms (in national currency)	117,176,241	146,355,992	158,869,491	170,005,248	175,495,276	182,461,194	190,003,843	5.5%	5.4%
Total en route costs in real terms (in national currency at 2022 prices)	127,076,393	137,749,330	147,240,080	155,211,357	158,057,082	161,805,100	166,048,081	3.0%	3.8%
Total en route costs in real terms (in EUR2022) 1	127,076,393	137,749,330	147,240,080	155,211,357	158,057,082	161,805,100	166,048,081	3.0%	3.8%
YoY variation				5.4%	1.8%	2.4%	2.6%		
Total en route Service Units (TSU)	4,606,517	5,091,391	5,175,000	5,256,000	5,349,000	5,458,000	5,544,000	2.1%	1.7%
YoY variation				1.6%	1.8%	2.0%	1.6%		
Real en route unit costs (in national currency at 2022 prices)	27.59	27.06	28.45	29.53	29.55	29.65	29.95	0.9%	2.1%
Real en route unit costs (in EUR2022) 1	27.59	27.06	28.45	29.53	29.55	29.65	29.95	0.9%	2.1%
YoY variation				3.8%	0.1%	0.3%	1.0%		

National currency	EUR
¹ Average exchange rate 2022 (1 EUR=)	1.00
Forecast inflation index 2024 - Base 100 in 2022	107.70

b) Information on the baseline values for the determined costs and the determined unit costs

En route charging zone	Baseline 2019	Baseline 2024	Actuals 2019	Forecast 2024	2019 Baseline	2024 Baseline
Name of the CZ	2019 B	2024 B	2019 A	2024 F	adjustments	adjustments
Total en route costs in nominal terms (in national currency)	117,176,241	146,355,992	114,371,000	145,860,934	2,805,241	495,058
Total en route costs in real terms (in national currency at 2022 prices)	127,076,393	137,749,330	123,971,149	137,289,682	3,105,244	459,648
Total en route costs in real terms (in EUR2022) 1	127,076,393	137,749,330	123,971,149	137,289,682	3,105,244	459,648
Total en route Service Units (TSU)	4,606,517	5,091,391	4,640,860	5,091,391	-34,342	0

c) Detailed justifications for the adjustments to the baseline values

c.1) Adjustments to the 2019 baseline value for the determined costs

Adjustment #1	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
Actual cost correction	Met Éireann ASD	MET	Staff	232,000	256,811	256,811
and the second column to the s						

Description and justification of the adjustment

MET costs previously reported as 2019 actuals were costs charged (i.e. the determined cost), not costs incurred by MET ASD in 2019. This was an error, and the 2019 actual MET cost build up has now been validated by the NSA. This adjustment was already applied for assessing the RP3 trends relative to the target trend.

Adjustment #2	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
Actual cost correction	Met Éireann ASD	MET	Other Operating	2,158,000	2,388,785	2,388,785
Description and justification of the adjustment						

Number of adjustments

MET costs previously reported as 2019 actuals were costs charged (i.e. the determined cost), not costs incurred by MET ASD in 2019. This was an error, and the 2019 actual MET cost build up has now been validated by the NSA. This adjustment was already applied for assessing the RP3 trends relative to the target trend.

Adjustment #3	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
FMP/AMC positions returning from NATS	AirNav Ireland	ANSP	Staff	415,241	459,648	459,648
Description and justification of the adjustment						

This adjustment corrects for a change in the scope of functions in RP4 and associated cost allocation for RP4, relative to previous periods. The Flow Management Position and Airspace Management Cell functions currently being provided by UK NATS to Ireland must now be taken back from NATS. These functions have previously been carried out by NATS (noting that Ireland-UK Performance Plans were developed at FAB level) and no costs were allocated into AirNav Ireland's cost base in 2019 or 2024, however, linked to the exit of the UK from the EU, it is now neccessary for AirNav to provide this service itself. We have estimated that 10 additional staff will be required, planned to be delivered in 2025 and 2026. This adjustment is a conservative estimate based on the En Route apportionment of the associated staff costs only.

Total adjustments to the 2019 baseline value for the determined costs	Costs nominal NC	Costs real NC	Costs EUR2022	
Total adjustificities to the 2019 baseline value for the determined costs	2,805,240	3,105,244	3,105,244	

c.2) Adjustments to the 2019 service units

	Actual service units (M2)	Coefficient M2/M3	Source	Actual service units (M3)	Service units adjustment
Impact of transition to actual route flown	4,640,860	-0.74%	CRCO correction factor May 2019 (on 12 months)	4,606,517	-34,342

Other adjustment to the 2019 service units	No
Other adjustment to the 2019 service units	INU

Total adjustments to the 2019 service units -34,342

c.3) Adjustments to the 2024 baseline value for the determined costs

Adjustment #1	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
FMP/AMC positions returning from NATS	AirNav Ireland	ANSP	Staff	495,058	459,648	459,648
Pescription and justification of the adjustment						

This adjustment corrects for a change in the scope of functions in RP4 and associated cost allocation for RP4, relative to previous periods. The Flow Management Position and Airspace Management Cell functions currently being provided by UK NATS to Ireland must now be taken back from NATS. These functions have previously been carried out by NATS (noting that Ireland-UK Performance Plans were developed at FAB level) and no costs were allocated into AirNav Ireland's cost base in 2019 or 2024, however, linked to the exit of the UK from the EU, it is now neccessary for AirNav to provide this service itself. We have estimated that 10 additional staff will be required, planned to be delivered in 2025 and 2026. This adjustment is a conservative estimate based on the En Route apportionment of the associated staff costs only.

_	Total adjustments to the 2024 baseline value for the determined costs	Costs nominal NC	Costs real NC	Costs EUR2022
Total adjustments to the 2024 baseline value for the determined costs	otal adjustificitis to the 2024 baseline value for the determined costs	495,058	459,648	459,648

c.4) Adjustments to the 2024 service units

Other adjustment to the 2024 service units	No
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d) Justification of the consistency of the local en route cost-efficiency performance targets with the Union-wide targets

A deviation from the short-term and long-term target trends is observed. The NSA has reviewed the drivers of this trend, and assesses it to be necessary and proportionate in reflecting the costs of measures processary to achieve the capacity targets for RPA. It is driven by increased ATCO recruitment, and major investment in the ATM systems, and associated measures. Based on the Business Plan submissions of

Number of adjustments

AirNav Ireland and MET ASD, the short term trend would have been +4.2%, and the long term trend would have been +1.7%, which, by contrast, in our view, would not have been proportionate with reference to achieving those targets.

e) Where a deviation from the Union-wide performance targets is observed, please indicate if the NSA considers those deviations to be necessary and proportionate under:

Additional costs of measures necessary to achieve the capacity targets for RP4	Yes	Detailed in part 3.4.9 of the performance plan
Restructuring costs planned for RP4	No	

f) Main measures put in place to achieve the targets for determined unit cost (DUC) for en route ANS

The IAA will monitor and validate actual cost efficiency performance, through the provision of regulated entity accounts and other reporting arrangements.

The NSA has set cost efficiency targets which are intended to be challenging but achievable for the regulated entities, while delivering the required level of service. Most of the cost risk, particularly for operating costs, is assigned to AirNav Ireland within the regulatory period. This is the primary incentive-based regulatory mechanism which creates an incentive to incur efficient expenditure only, in order to increase profit. This is the main incentive measure in place to achieve or outperform the DUC for En Route ANS.

g) Verification by the NSA

Confirmation by the NSA that the data and information included in this section have been verified in accordance with Art. 22(7) of IR 2019/317	Yes

^{*} Refer to Annex R, if necessary.

^{*} Refer to Annex R, if necessary.

3.4.2 - Cost-efficiency KPI #2: Determined unit cost (DUC) for terminal ANS

Terminal Charging Zone #1 - Ireland - TCZ

a) RP4 cost-efficiency performance targets

Terminal charging zone	Baseline 2024	RP4 cost-efficiency targets (determined 2025-2029)					2029D vs. 2024B
Name of the CZ	2024 B	2025 D	2026 D	2027 D	2028 D	2029 D	(CAGR)
Total terminal costs in nominal terms (in national currency)	32,305,197	35,959,328	38,285,602	39,928,400	41,386,068	43,560,165	6.2%
Total terminal costs in real terms (in national currency at 2022 prices)	30,663,112	33,732,546	35,454,268	36,612,270	37,478,551	39,027,098	4.9%
Total terminal costs in real terms (in EUR2022) ¹	30,663,112	33,732,546	35,454,268	36,612,270	37,478,551	39,027,098	4.9%
YoY variation			5.1%	3.3%	2.4%	4.1%	
Total terminal Service Units (TNSU)	205,000	215,000	221,000	226,000	233,000	237,000	2.9%
YoY variation			2.8%	2.3%	3.1%	1.7%	
Real terminal unit costs (in national currency at 2022 prices)	149.58	156.90	160.43	162.00	160.85	164.67	1.9%
Real terminal unit costs (in EUR2022) ¹	149.58	156.90	160.43	162.00	160.85	164.67	1.9%
YoY variation			2.3%	1.0%	-0.7%	2.4%	

National currency	EUR
1 Average exchange rate 2022 (1 EUR=)	1.00
Forecast inflation index 2024 - Base 100 in 2022	107.70

b) Information on the baseline values for the determined costs and the determined unit costs

Terminal charging zone	Baseline 2024	Forecast 2024	2024 Baseline
Name of the CZ	2024 B	2024 F	adjustments
Total terminal costs in nominal terms (in national currency)	32,305,197	32,148,863	156,334
Total terminal costs in real terms (in national currency at 2022 prices)	30,663,112	30,517,960	145,152
Total terminal costs in real terms (in EUR2022) 1	30,663,112	30,517,960	145,152
Total terminal Service Units (TNSU)	205,000	205,000	0

c) Detailed justifications for the adjustments to the baseline values

c.1) Adjustments to the 2024 baseline value for the determined costs

Number of adjustments	1
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Adjustment #1	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
FMP/AMC positions returning from NATS	AirNav Ireland	ANSP	Staff	156,334	145,152	145,152
Description and justification of the adjustment						

This adjustment corrects for a change in the scope of functions in RP4 and associated cost allocation for RP4, relative to previous periods. The Flow Management Position and Airspace Management Cell functions currently being provided by UK NATS to Ireland must now be taken back from NATS. These functions have previously been carried out by NATS (noting that Ireland-UK Performance Plans were developed at FAB level) and no costs were allocated into AirNav Ireland's cost base in 2019 or 2024, however, linked to the exit of the UK from the EU, it is now neccessary for AirNav to provide this service itself. We have estimated that 10 additional staff will be required, planned to be delivered in 2025 and 2026. This adjustment is a conservative estimate based on the Terminal apportionment of the associated staff costs only.

otal adjustments to the 2024 baseline value for the determined costs	Costs nominal NC	Costs real NC	Costs EUR2022
Total adjustifients to the 2024 baseline value for the determined costs	156,334	145,152	145,152

c.2) Adjustments to the 2024 service units

Adjustment to the 2024 service units	No
riajastinent to the 202 i service and	

d) Justifications for the local terminal cost-efficiency performance targets, including contribution to the improvement of the European ATM network performance

Similar to the approach to En Route, the NSA has sought to develop Terminal cost forecasts on the basis of efficiently delivering the required level of capacity and safety performance. This maximises the value that the provision of terminal services by AirNav Ireland will add to the European ATM network in RP4. Full details are set out in the cost sections of the IAA's Draft Decision and Final Decision, and in the CEPA draft and final reports.

The IAA notes that, notwithstanding that we have estimated lower Determined Cost requirements relative to those proposed by the regulated entities, the short term trend from 2024 to 2029 is increasing in real terms to a similar extent as the En Route charging zone (in this case +2%). Based on the Business Plan submissions from the regulated entities, before the IAA carried out its own verification and forecasting analysis with CEPA/THINK, the IAA has estimated that the short term trend would have been +4.6%.

The drivers of this +2.0% trend are very similar to the drivers of the En Route trend, being related to investment in the ATM systems, and in additional operational resourcing, in particular the recruitment of ATCOs and engineers (but only to the extent that the IAA/CEPA/THINK have assessed to be neccessary and proportionate). In the absence of such investment, we assess that a negative real unit cost trend could be achieved, however this would have negative implications for the ability to achieve the capacity targets for RP4 and beyond, as well as, for example, negative implications in respect of CP1 given that this investment is required in order to deliver CP1 functionalities.

e) Main measures put in place to achieve the targets for determined unit cost (DUC) for terminal ANS

The IAA will monitor and validate actual cost efficiency performance, through the provision of regulated entity accounts and other reporting arrangements.

The NSA has set cost efficiency targets which are intended to be challenging but achievable for the regulated entities, while delivering the required level of service. Most of the cost risk, particularly for operating costs,

^{*} Refer to Annex R, if necessary.

is assigned to AirNav Ireland within the regulatory period. This is the primary incentive-based regulatory mechanism which creates an incentive to incur efficient expenditure only, in order to increase profit. This is the main incentive measure in place to achieve or outperform the DUC for Terminal ANS.

f) Verification by the NSA

Confirmation by the NSA that the data and information included in this section have been verified in accordance with Art. 22(7) of IR 2019/3172

Yes

^{*} Refer to Annex R, if necessary.

Complementary information may be provided in ANNEX M

a) Summary of services provided

Air navigation services provided		Description of the services provided by the concerned entity
ATS/ATM	Yes	AirNav Ireland provides air traffic management and related services within the 451,000km2 of airspace.
Communication	Yes	AirNav Ireland uses Air/Ground and Ground/Ground based communications systems to ensure the safety and regularity of air traffic.
Navigation	Yes	Integrated operational requirements are planned and developed for the provision of Air Navigation Services.
Surveillance	Yes	AirNav Ireland uses 8 Mode-S Radars and 3 Solid State Primary Radars at nine radar sites across Ireland to deliver full coverage of the airspace, and the ARTAS system merges this data and distributes the appropriate air situation picture to ATCO's. ASMGCS (Advanced Surface Movement Guidance and Control System) incorporates Surface Movement Radar, Multilateration and ADS-B to facilitates safe movement of aircraft and vehicles at Dublin Airport.
Search and rescue	No	
Aeronautical Information	No	
Meteorological services	No	
Services to OAT	No	
Cross-border ATS	No	Other than in respect of the delegated blocks of airspace already identified.

Description of the methodology used for allocating costs of facilities or services between different air navigation services based on the list of facilities and services listed in ICAO Regional Air Navigation Plan European Region (Doc 7754) as last amended and a description of the methodology used for allocating those costs between different charging zones.

First, costs which are properly to be allocated outside of either the Terminal or En Route charging zones are excluded entirely. This applies, in particular, to costs which are allocated to the North Atlantic Communications (NAC) charging zone. AirNav Ireland does not provide services at any airport outside the scope of the performance plan. The cost forecasts are then split between the single Terminal and single En Route charging zones, as addressed further below.

Then, forecast costs by eligible service (i.e. those listed in the above table) has been based on the outturn cost split by service from RP3 to date, with the large majority allocated to 'ATM/ANS'.

b) Allocation of costs by segment

ANSP costs by segments (in nominal terms in '000 national currency)		2026	2027	2028	2029
Determined costs for en route charging zone(s) in the scope of the performance plan	132,803	143,282	148,434	155,270	162,474
Determined costs for terminal charging zone(s) in the scope of the performance plan	32,167	34,376	35,939	37,367	39,471
Forecasted costs for terminal services at airports outside the scope of the performance plan	N/A	N/A	N/A	N/A	N/A

Description of the criteria used to allocate costs between terminal and en route services in accordance with Article 22(5), including at airports outside the scope of the performance plan

Staff Costs: For operational ATCOs, the required efficient staffing level has been modelled by CEPA/THINK (on behalf of the NSA) separately for each location, such as Dublin control centre, Shannon ACC, etc. AirNav Ireland's allocation keys, which we and CEPA/THINK have validated, have then been used to split our forecast into the En Route and Terminal charging zones. For non-operational ATCOs, the 2024 budget cost-allocation is used. Other staff costs have been allocated based on a mixture of AirNav Ireland's allocation keys and 2023 outturn cost allocation. These allocations between Terminal and En Route are broadly assessed to remain constant throughout RP4. However, in cases where step-changes are expected, as is the case for data assistants, year-on-year adjustments are applied in our forecast, based on location.

Other Operating Costs: The approach to the allocation of other operating costs, as forecast by the NSA, can be summarised as follows.

- For operational non-staff costs, the costs are initially allocated to an 'Activity' and to a 'Location'. Then AirNav Ireland uses a standardised allocation key to split these costs into En Route and Terminal charging zones, depending on the Activity and Location.

-For more general support costs, these are split into specific subcategories, each of which has a defined allocation key.

As most Other Operating costs comprise multiple activities and locations, the overall allocation for each non-staff cost category is a weighted average depending on the structure of spend.

Capital Costs and Investments: Costs are first allocated to geographical cost centres, such Shannon ACC (Ballycasey), Dublin contol centre, Cork Airport, Shannon Airport, North Atlantic Communications (Ballygireen), and Headquarters (D'Olier Street). Where a project is solely associated with the provision of En Route services, such as at Ballycasey, it is allocated 100% to the En Route cost base. If solely associated with the provision of Terminal services, it is allocated 100% to the Terminal cost base. If the project is to be used for the provision of both En Route and Terminal services at a given location, it is jointly allocated. The apportionment of jointly allocated projects depends on the location. At Dublin and Shannon ACC, costs are allocated 75:25 to En Route, while at Cork the apportionment is 50:50. The assets for the headquarters are assigned 73% to En Route, 15% to Terminal, and 12% to NAC. These allocation keys reflect the extent to which each location provides services to Terminal/En Route traffic, having regard to the 20km charging zone boundary, and the mix of ACC, Approach, and Tower services provided by each ATC unit.

c) Allocation of costs related to the provision of approach services

Allocation of costs related to approach services (in nominal terms in '000 national currency)	2025	2026	2027	2028	2029
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Total determined costs for approach services	N/A- see below		
Determined costs for approach services allocated to the en route charging zone(s)	N/A- see below		
Determined costs for approach services allocated to the terminal charging zone(s) within the scope of the performance plan	N/A- see below		

Description of the methodology used for establishing approach costs and allocating them between en route and terminal services, including the distance from the relevant airport(s) used for allocating approach costs and description of the operational requirements on the basis of which that distance has been defined

See Annex M, together with CEPA/THINK draft report and final report.

d) Description of other services and activities outside the scope of the performance plan and their financing

Based on the description of the services provided under item a) above, describe the nature of the activities outside the scope of the performance plan, the related costs and the arrangements in place to finance them as well as the methodology used by the NSA to ensure that these amounts are excluded from the cost bases charged to airspace user

Terminal ANS at airports (outside the scope of the performance plan)	No
Services to OAT	No
Other ANS	Yes
If yes, description of the nature of the services provided and the geographical scope	
North Atlantic Communications (NAC) services within Shanwick oceanic airspace.	
If yes, description of the arrangements for the financing of the services provided	
Users of the oceanic airspace pay a separate unit rate. All direct costs associated with the provision of this service, and the corresponding proportion of	of central
costs (such as corporate services), are excluded from this draft Performance Plan and allocated to the NAC charging zone.	

Non ANS No

e) Changes in cost allocation methodology

Are there changes in the cost allocation criteria with respect to the previous reference period?

If yes, please provide the description and justification of the changes and impact(s) on the determined costs and/or baseline.

f) Verification by the NSA

Confirmation by the NSA that the data and information included in this section have been verified in accordance with Art. 22(7) of IR 2019/317

Yes

3.4.4 - Cost allocation METSP - Met Éireann Aviation Services Division (ASD)

Complementary information may be provided in ANNEX M

a) Summary of services provided

Description of the services provided by the meteorological service provider, the geographical scope and the different users for which the services are provided

MET ASD is a business unit of Met Éireann, Ireland's National Meteorological Service, which is maintained by the State under the UN Convention of the World Meteorological Organisation (WMO). The ASD is designated as Ireland's Meteorological Authority under the ICAO Chicago Convention on International Civil Aviation and since 2006 has been designated as a meteorological Air Navigation Services Provider (MET ANSP) under the EU Single European Sky Service Provision Regulation (CIR EU 550/2004) and therefore has responsibility for the provision of regulated meteorological services to aviation. Regulatory compliance and oversight of the ASD is conducted by the IAA.

The aeronautical meteorological services provided by ASD include the maintenance of the Meteorological Watch Office for the Shannon FIR, the provision of aeronautical forecast and warning services, and maintenance of five aeronautical meteorological stations.

b) Allocation of costs by segment

Meteorological ANS costs (direct + core) by segments (in nominal terms in '000 national currency)		2026	2027	2028	2029
Determined costs for en route charging zone(s) in the scope of the performance plan	8,959	9,262	9,448	9,417	9,539
Determined costs for terminal charging zone(s) in the scope of the performance plan	2,240	2,316	2,362	2,354	2,385
Forecasted costs for terminal services at airports outside the scope of the performance plan	390	403	416	427	439

c) Breakdown of determined meteorological costs between direct and core costs and allocation between en route and terminal services

Description of the meteorological costs and of the methodology for allocating these costs between direct costs and the costs of supporting meteorological facilities and services that also serve meteorological requirements in general ('MET core costs')

MET ASD cost allowances included in the draft performance Plan are based on the determined operational and capital costs forecast over the RP4 period which have been set by the IAA following our analysis of eligibility and efficiency. For further details, see Section 7 of our Draft Decision and Final Decision. The costs can be subdivided between:

-Direct costs, which are related to aviation specific activities and services.

-Core costs, which are associated with the basic meteorological infrastructure and/or central service provision, upon which services to aviation (as well as other services) depend.

Both categories of costs are outlined below in the relevant tables. The costs are established through the application of a cost allocation methodology. Met Éireann uses its Internal Accounts System (IAS) to enable the aviation costs to be determined and reported. There are four primary categories of activity: Core, Civil Aviation, Public Weather Services and Commercial. These are further sub-divided, to give a total of 32 sub-categories. There are also 5 sub-categories for "support" costs such as administration, accommodation and training and these are apportioned to the primary sub-categories. The notional cost of services provided free to the State by Met Éireann is also accounted for in the cost allocation system.

d) Meteorological direct costs and allocation across charging zone(s)

Total determined direct meteorological costs allocated to the charging zones within the scope of the performance plan (in nominal terms in '000 national currency)			2026	2027	2028	2029
En route charging zone 1	Ireland	5,548	5,732	5,869	5,962	5,753
Terminal charging zone 1	Ireland - TCZ	1,387	1,433	1,467	1,491	1,438
Total forecasted costs for the concerned entity			7,165	7,337	7,453	7,191

Description of the items included in the meteorological direct costs and methodology used to allocate these costs in the scope of the performance plan, as well as across charging zone(s).

The meteorological direct costs relate to staff, production, operating, depreciation, and support costs which are solely driven by the following aviation specific services:

METAR Reports: METAR reports (excluding TREND) as specified in ICAO Annex 3

Reports for ATS: Instrument display systems for ATS; also plain-language reports for ATS (excluding TREND)

Automated Flight Briefing Material: Online Met Self Briefing System

Verbal Briefing: Briefing and consultation (excluding General Aviation and Military) TAFs (FT and FC): Terminal Area Forecasts (excluding General Aviation and Military)

SIGMET: SIGMET as specified under ICAO Annex 3

Aerodrome Warning: Aerodrome warnings; wind-shear warnings as specified in ICAO Annex 3
Airport/ATC enquiries: Enquiries from airport agencies (airport authorities, IAA, etc.) and local ATC

Graphical Charts: Low level significant weather charts; upper level tabular wind charts as specified in ICAO Annex 3

Additional forecast data: 5-day tabular forecast

Consultation with adjacent MWO: Regarding SIGMET issuance and network weather in line with ICAO Annex 3 recommendations.

Cross Border Convective Forecast Service: Collaborative cross border forecast service aggregated across the EUROCONTROL network domain.

These costs are fully allocated to aviation. However, costs which are allocable to aviation activities but outside the scope of the charging zones (in particular, those relating to Casement aerodrome and Knock airport) have not been included in this draft Performance Plan.

As to the split between the Terminal and En Route charging zones, following a previous assessment by the IAA (then CAR), charges to civil aviation have been split 80:20 between the En Route and Terminal charging zones respectively. As set out in Section 7 of our Draft Decision and Final Decision, the IAA has carried out a high level reassessment of those allocation keys, including with reference to the PRB's Review of the Reporting of Meteorological Costs for Air Navigation Services, and concluded that there was no basis to amend these keys for RP4.

e) Meteorological core costs and allocation across charging zone(s)

Total determined core meteorological costs allocated to the charging zones within the scope			2026	2027	2028	2029
of the performance plan (in nominal terms in '000 national currency)			2026	2027	2028	2029
En route charging zone 1 Ireland		3,411	3,530	3,579	3,455	3,786
Terminal charging zone 1	Ireland - TCZ	853	882	895	864	947
Total forecasted costs for the concerned entity			4,412	4,473	4,318	4,733

Description of the items included in the meteorological core costs and methodology used to allocate these costs to civil aviation, including the proportion of meteorological core costs included in the scope of the plan as compared to total meteorological costs incurred by the entity, as well as across charging zones.

In respect of core costs, there are 9 identified categories of Core Costs associated with Met Éireann activities used to support, amongst other functions, the aviation services. These are surface synoptic observations; upper air observations, RADAR data, Satellite data, NWP, Climatological data, ICT, Internal Forecasting Guidance and Library/Laboratory and Environment activities. All of the foregoing make a contribution to aviation services. However, the contribution of some Core activities is very small and has been discounted while others are complex to apportion fairly – and so these are also not included. Therefore, aviation is not allocated any portion of costs associated with Internal Forecasting Guidance, Library/Laboratory and Environment activities.

The allocation key otherwise used to assign Core Costs (operating and capital) to aviation has been updated for RP4. The adjustment is primarily the result of the growing remit of Met Éireann in its service areas due to the implementation of both the Flood Forecasting Centre (FFC) (which will become operational during 2024) and the establishment of a Climate Services Division. Because these new service activity areas also have a demand on the Core infrastructure, this dilutes the coefficients to be applied to apportion Core costs to other services, including aviation. The impact in respect of RP4 is a reduction to 17.4% in the Core costs allocation key to aviation services.

The same 80:20 split between the Terminal and En Route charging zones is also applied in the case of Core costs.

f) Changes in cost allocation methodology

Are there changes in the cost allocation criteria with respect to the previous reference period? If yes, please provide the description and justification of the changes and impact(s) on the determined costs and/or baseline.

No

The cost allocation criteria have not changed, however the allocation key used to allocate costs to aviation has reduced somewhat, due to a broader scope of functions diluting it, as explained above.

g) Verification by the NSA

Confirmation by the NSA that the data and information included in this section have been verified in accordance with Art. 22(7) of IR 2019/317

Yes

3.4.5 - Cost allocation - NSA

Complementary information may be provided in ANNEX M

a) Supervision costs

Description of the supervision activities performed by the NSA(s), the underlying assumptions used to estimate the related determined costs and the main factors explaining the variations of these costs over the reference period

The NSA function is assigned to the IAA, Ireland's single civil aviation authority. The IAA is responsible for economic and performance regulation and cost efficiency under the SES performance and charging regulations. The Safety Regulation Division of the IAA has the NSA responsibilities of safety oversight and licensing. The IAA's Air Navigation Services Division (ANSD), Airspace Division, and Search and Rescue (SAR) oversight Divisions are the sections within the IAA which are directly allocated to the NSA, in full. One third of the IAA's economic regulation team has been directly allocated to the NSA, given that ANS economic and performance regulation is one of three main functions performed by that team.

A proportion of the IAA's core costs are also included in the NSA costs. This proportion is based on the total direct NSA costs, divided by the total direct costs of all other functions, which amounts to approximately 19% for RP4. The IAA's Determined Costs for RP4 have been based on the IAA's budget for 2024, extrapolated forward to 2029, such that they stay broadly flat in real terms. The only significant variation comes from the capitalisation of building upgrade works which occurs in 2026. For further details, please see section 8 of the IAA's Draft Decision and Final Decision documents.

Total supervision costs also include Eurocontrol costs, State policy costs associated with ANS, and State subscriptions to ICAO and ECAC.

Description of the methodology used to allocate NSAs supervision costs between en route and terminal as well as across different charging zones

NSA costs are allocated 73% En Route, 15% Terminal, and 12% to North Atlantic Communications (NAC), which is allocated outside of the scope of the
performance plan. 100% of Eurocontrol costs are allocated to the En Route charging zone, while costs of the Department of Transport follow the allocations of the
NSA (73% En Route, 15% Terminal, 12% NAC). The NSA cost allocation methodology is unchanged from RP3, based on the proportion of revenues generated by
each of the three charging zones.

b) Search and rescue costs (if reported as part of the NSA costs)

Description and underlying assumptions for search and rescue costs and main factors explaining the variations over the reference period

Search and Rescue (SAR) direct costs are fully allocated to the NSA. A proportion of the IAA's core costs are also allocated to the Search and Rescue division. SAR costs remain flat in real terms across the reference period with little variation year on year. These relate only to the cost of oversight of the SAR service by the IAA-the cost of SAR service provision itself has not been included within the draft Performance Plan, on this occasion.

Total search and rescue costs for the entity providing search and rescue services (in nominal terms in '000 national currency)		2026	2027	2028	2029
Determined costs for en route charging zone(s) in the scope of the performance plan	1,129	1,163	1,192	1,223	1,256
Determined costs for terminal charging zone(s) in the scope of the performance plan	226	233	238	245	251
Forecasted search and rescue costs outside the scope of the performance plan	191	197	202	207	212

Description of the methodology used to allocate search and rescue costs to civil aviation and in the scope of the performance plan, including the proportion of search and rescue costs included in the scope of the plan as compared to total search and rescue costs incurred by the entity

The NSA is responsible for oversight of SAR services. The SAR proportion of the NSA costs included in the performance plan is limited to the costs associated with maintaining the oversight programme.

Description of the methodology used to allocate search and rescue costs to civil aviation between en route and terminal as well as across different charging zones It follows the general methodology to allocate IAA costs, as outlined above.

c) Changes in cost allocation methodology

Are there changes in the cost allocation criteria with respect to the previous reference period? If yes, please provide the description and justification of the changes and impact(s) on the determined costs and/or baseline.

Yes

Since 2021, the regulatory reform process in Ireland has been completed, and the new IAA has been established as the single civil aviation regulator which now encompasses both the economic regulation and safety oversight functions. The ANSP function has been transferred to a new company, AirNav Ireland.

The new regulator has therefore developed a cost allocation and charging system in respect of its direct costs, and core costs (following public consultation). Regulatory divisions within the IAA which are directly allocated to the NSA are allocated a proportion of total IAA corporate services costs (eg. HR, Finance, Facilities). The proportion of core costs allocated corresponds to the share of each division's direct costs in the full IAA cost base in that year. The total NSA costs is equal to the sum of each directly allocated regulatory division's direct and core costs. Further detail on the NSA cost allocation criteria is contained in Section 8 of our Draft Decision and Final Decision documents. In the case of NSA costs, the new methodology has not led to a very different outcome relative to the 2021 methodology, when there was two separate NSAs.

d) Verification by the NSA

Confirmation by the NSA that the data and information included in this section comply with the requirements of Article 15(2) Regulation (EC) No 550/2004 and with IR 2019/317.

Yes

3.4.6 - Determined costs assumptions - AirNav Ireland

3.4.6.1 - Operating costs

a) Staff costs Number of entries 10

#	Staff costs building blocks (in nominal	Description of the composition of	Charging zones	Actual	Forecast			Determined		
#	terms in '000 national currency)	each item	Charging zones	2023	2024	2025	2026	2027	2028	2029
			En-route charging zones		39,141	40,572	42,293	43,603	45,785	46,952
1	Operational ATCOs	Operational ATCOs	Terminal charging zones		6,410	6,782	6,933	7,107	7,359	7,523
2	Station Managers	Station Managers	En-route charging zones		3,892	4,499	4,715	4,878	5,052	5,226
2	Station Managers	Station Managers	Terminal charging zones		637	752	773	795	812	837
2	3 ATM Specialists	ATM Specialists	En-route charging zones		1,318	2,460	2,555	2,641	2,731	2,824
3	ATIVI Specialists	AT IVI Specialists	Terminal charging zones		168	314	326	337	349	361
4	Corporate Services	Includes IT, Finance, HR, Property and	En-route charging zones	4,643	5,636	6,123	6,460	6,694	6,938	7,188
4	Corporate services	Facilities, and Sustainability	Terminal charging zones	901	1,081	1,174	1,239	1,284	1,331	1,378
5	Data Assistant	Data Assistants	En-route charging zones	2,480	2,969	3,066	3,206	3,315	3,427	3,545
3	Data Assistant	Data Assistants	Terminal charging zones	291	342	353	369	382	395	408
6	FMP/AMC	Roles related to the return of	En-route charging zones	0	0	270	564	583	603	624
0	TIVII / AIVIC	FMP/AMC functions	Terminal charging zones	0	0	85	178	184	190	197
7	Engineer	Engineers	En-route charging zones	8,529	12,739	13,491	13,958	14,545	15,187	15,818
	Liigineei	Liigineers	Terminal charging zones	1,500	2,248	2,381	2,463	2,567	2,680	2,791
8	Operations Management Support	Operations Management Support	En-route charging zones	5,984	7,677	9,296	9,980	10,714	11,219	11,610
	Operations Management Support	Operations Management Support	Terminal charging zones	961	1,250	1,513	1,625	1,744	1,826	1,890
9	Pension Payout Cost	Fixed pension contributions	En-route charging zones	14,617	4,204	4,197	4,196	4,182	4,170	4,154
	Tension rayout cost	Tixed perision contributions	Terminal charging zones	2,447	695	702	697	692	685	681
			En-route charging zones	38,549						
10	ATCOs	Operational ATCOs, Station Managers, ATM Specialists (for 2023)	Terminal charging zones	6,678						
Tata	staff costs	·	En-route charging zones	74,802	77,577	83,974	87,928	91,155	95,111	97,939
ıota	I Stair COSTS		Terminal charging zones	12,778	12,832	14,057	14,604	15,093	15,627	16,067
		The IAA does not consider that	En-route charging zones	0	0	0	0	0	0	0

Accounting provisions included in total staff costs	including any accounting provisions is the correct approach to a system of incentive based economic regulation. This 'banks' downside scenarios and double counts ordinary business risk, which is already remunerated through the cost of equity.	Terminal charging zones	0	0	0	0	0	0	0
Assumptions underlying the determined	Detail on the assumptions underlining the determined pension costs and	En-route charging zones	14,611	12,187	12,852	13,344	13,612	13,930	14,144
pension costs and expected evolution over Reference Period 4 (for Main ANSP please refer to tab 3.4.7)	expected evolution are provided in Tab 3.4.7.	Terminal charging zones	2,446	2,006	2,121	2,209	2,254	2,306	2,342

Description of the main factors explaining the planned variations of staff costs over the reference period

Headcount is the primary factor explaining the variation of staff costs over the reference period. The efficient level of headcount is forecast to increase from 636 in 2025, to 690 in 2029, which is driving the consistent increase throughout the period. Discussion on the increase in headcount can be found in the CEPA 'AirNav Ireland Operating Expenditure: Bottom-up Efficiency Assessment' reports which are provided as part of the draft Performance Plan documentation, as well as in section 4 of the IAA's Draft Decision and Final Decision documents.

b) Other operating costs

Number of entries

7

	Other operating costs building blocks	Description of the composition of		Actual	Forecast			Determined		
#	(in nominal terms in '000 national currency)	each item	Charging zones	2023	2024	2025	2026	2027	2028	2029
1	Travel	Cost lines relating to travel expenses	En-route charging zones	916	1,270	1,295	1,320	1,346	1,373	1,400
1	liavei	Cost lines relating to travel expenses	Terminal charging zones	147	239	244	249	253	259	264
2	Training Costs lines relating to training	Costs lines relating to training	En-route charging zones	5,894	7,548	8,346	11,045	8,431	10,195	11,857
		Costs lines relating to training	Terminal charging zones	1,401	1,761	1,947	2,577	1,967	2,378	2,766
3	Utilities	Cost lines relating to utility costs	En-route charging zones	541	2,156	2,199	2,242	2,286	2,331	2,378
3			Terminal charging zones	120	609	622	634	646	659	672
4	Telecommunications	Cost lines relating to telecoms	En-route charging zones	2,235	2,408	2,578	2,647	2,716	2,791	2,863
4		Cost lines relating to telecoms	Terminal charging zones	359	376	402	413	424	435	447
5	Operational	Cost lines relating to other operational	En-route charging zones	6,563	6,927	7,776	8,747	9,617	9,029	9,336
5	Operational	spending	Terminal charging zones	1,766	1,779	1,987	2,229	2,443	2,306	2,387
6	Subscriptions	Cost lines relating to subscriptions	En-route charging zones	364	465	556	556	557	556	556
0	Subscriptions	Cost lines relating to subscriptions	Terminal charging zones	78	99	118	118	118	118	118
7	Administration	Cost lines relating to administration	En-route charging zones	12,828	13,473	14,548	15,011	15,471	15,952	16,452
/	Administration	Cost lines relating to administration	Terminal charging zones	3,291	3,071	3,325	3,426	3,525	3,628	3,736
Tata	other operating costs		En-route charging zones	29,341	34,247	37,298	41,567	40,423	42,227	44,842

rotal other operating costs	Terminal charging zones	7,163	7,935	8,644	9,645	9,375	9,783	10,389
Accounting provisions included in total other	En-route charging zones	0	0	0	0	0	0	0
operating costs	Terminal charging zones	0	0	0	0	0	0	0
Costs for ground-ground communication	En-route charging zones	769	803	859	882	905	930	954
services	Terminal charging zones	120	125	134	138	141	145	149
Costs for air-ground communication services	En-route charging zones	769	803	859	882	905	930	954
via terrestrial link	Terminal charging zones	120	125	134	138	141	145	149
Costs for air-ground communications services	En-route charging zones	769	803	859	882	905	930	954
via satellite link	Terminal charging zones	120	125	134	138	141	145	149

Description of the main factors explaining the planned variations of other operating costs over the reference period

AirNav Ireland is forecasting significant step-increases in spending on other operating costs compared with current and historic levels. In assessing the efficiency of these proposed increases, CEPA/THINK disaggregated other operating costs into 24 separate categories, with each assessed individually. More detail on the forecast increased spending across RP4 by cost line can be found in the CEPA/THINK draft and final reports. Some of the main increases relate to increased training costs (itself related to ATCO recruitment), as well as maintenance/spares relating to the new ATM system.

c) Exceptional items	Number of entries	0				
Accounting provisions included in total		En-route charging zones				
exceptional items		Terminal charging zones				

Description of the main factors explaining the planned variations of other exceptional items over the reference period

N/A

d) Accounting provisions

Number of entries 0

3.4.6.2 - Investment costs

a) Depreciation costs

Method adopted for the calculation of the depreciation cost (point 1.3 of Table 1):

Historical

If current cost accounting is applied, equivalent historical cost accounting figures have to be provided in Annex E in order to allow for comparison

b) Cost of capital

Description of the assumptions used to compute the cost of capital (point 1.4 of Table 1), including the composition of the asset base, the return on equity, the average interest on debts and the shares of financing of the asset base through debt and equity

The cost of capital is the estimate of the return which investors (equity shareholders and holders of debt) in AirNav Ireland would require. It should balance rewarding exisiting investors appropriately, enabling the delivery of required infrastructure, and protecting the interests of airspace users from excessive charges. For RP4, the IAA has set the real cost of capital for AirNav Ireland at 4.26%. In its Business Plan submission, AirNav Ireland proposed a

real cost of capital of 4.91%.

The cost of capital assumptions are summarised below. More detail on our assessment of all of the components of the cost of capital for AirNav Ireland can be found in Section 5 of the Draft Decision and Final Decision document.

Cost of capital assumptions	Description of each item
	Cost of capital is calculated by reference to
	(i) NBV of the regulated asset base, calculated at each month end,
	(ii) Cost of capital incurred before commissioning an asset capitalised and depreciated over the useful life of that asset.
NBV fixed assets	Assets are depreciated on a straighline basis. The largest project to be added to the average asset base during RP4 is TopSky ATC One. More information on AirNav Ireland's major
New med assets	projects and the depreciation of these projects can be found in the Performance Plan financial model.
	Details on AirNav Ireland's smaller investments can be found in Tab 2.1 of the Performance Plan template, and in Appendix 1 of the IAA's Draft Decision and Final Decision Documents.
A.P. down to be because	
Adjustments total assets	None
Net current assets	None - Net current assets are not included in the cost of capital calculation.
	The IAA has calculated that the determined costs should provide for a real pre-tax rate of 4.26% (the nominal WACC therefore ranges from 6.30% to 6.35% across RP4), based on the
	following assumptions, for AirNav Ireland. All real and nominal components of the WACC can be observed in Tab 'AirNav WACC (IAA)' of the Performance Plan financial model.
Cost of capital %	
	The contract of co
	The pre-tax return on equity is 7.3% in real terms (therefore 9.5% in nominal terms), across RP4. The cost of equity is estimated using the Capital Asset Pricing Model (CAPM). The
Return on equity	CAPM describes the expected return for assets and equities, and in cases where equities are traded in markets, some of the parameters are observable based on market data.
	The average interest on debts is 1.17% in real terms (therefore ranging from 3.1% to 3.2% in nominal terms), across RP4. AirNav Ireland does not hold any embedded debt. We have
	therefore calculated the cost of new debt using the various fees and rates in AirNav Ireland's undrawn Revolving Credit Facility (RCF) arrangements. Nominal debt costs have been
Average interest on debts	converted to real debt costs using the Fisher equation and an inflation rate of 1.98%, which is the RP4 average rate based on the April 2024 IMF forecast for 2025 to 2029. This leads to a real cost of debt of 1.17%.

	We have set AirNav Ireland's notional share of financing through equity across RP4 at 50% . While the ANSP currently has no debt, and its current actual gearing is therefore zero, it has put in place borrowing facilities. However, uncertainty on the timing and extent to which these facilities may be used means AirNav Ireland's level of gearing throughout RP4 is uncertain.
Share of financing through equity	There is no universally accepted precise level of gearing that is considered to be efficient or optimal; however, regulatory decisions within the Irish and European aviation sector in recent years, including our own, have used values between 50% and 60% (based on ranges around these values).
	We consider a notional gearing point estimate of 50% appropriate.

3.4.6.3 - Costs for VFR exempted flights

Description of the methodology and assumptions used to establish the costs of air navigation services provided to VFR flights, when exemptions are granted for VFR flights in accordance with Article 31(3), 31(4) and 31(5)

The cost of VFR flights is captured in an annual amount of €127k, consistent with previous years.

3.4.6.4 - NSA verification

Findings of the verification by the NSA (under Art. 22(7) of IR 2019/317) of the compliance of the determined costs of the ANSP with the requirements of Article 15(2) of Reg. 550/2004 and Article 22 of IR 2019/317, and where applicable identification of corrections applied to the cost base as a result of this verification

The IAA has ensured that only eligible and efficient costs, based on prudent estimates and input assumptions, are included in the determined costs for AirNav Ireland. This has resulted in a range of adjustments and alternative assumptions being adopted, as is apparent from the descriptions elsewhere in this template and the supporting documentation.

3.4.6 - Determined costs assumptions - Met Éireann Aviation Services Division (ASD)

3.4.6.1 - Operating costs

a) Staff costs Number of entries 1

	#	Staff costs building blocks (in nominal	Description of the composition of	Charging zones	Actual	Forecast			Determined			
	#	terms in '000 national currency)	each item	Charging zones	2023	2024	2025	2026	2027	2028	2029	
				En-route charging zones	3,635	4,241	4,609	4,746	4,839	4,935	4,740	
	1	Staff costs	Staff costs are determined based on a bottom-up assessment of MET ASD's forecast staffing profile over RP4.	Terminal charging zones	908	1,060	1,152	1,187	1,210	1,234	1,185	
_	Total staff costs		En-route charging zones	3,635	4,241	4,609	4,746	4,839	4,935	4,740		
10	otais	stan costs		Terminal charging zones	908	1,060	1,152	1,187	1,210	1,234	1,185	
Ac	ccou	nting provisions included in total staff		En-route charging zones	0	0	0	0	0	0	0	
со	osts			Terminal charging zones	0	0	0	0	0	0	0	
		Pension costs for MET ASD	Pension costs for MET ASD are based	En-route charging zones	327	635	705	726	740	755	724	
pe Re	pension costs and expected evolut	nptions underlying the determined on costs and expected evolution over ence Period 4 (for Main ANSP please	on the Government of Ireland Public Service Pensions scheme. We note that the previously reported pension cost for 2023 appears to have been understated, which explains the change from 2023 to 2024.	Terminal charging zones	82	159	176	181	185	189	181	

Description of the main factors explaining the planned variations of staff costs over the reference period

Headcount is the primary factor explaining the variation of staff costs over the reference period. MET ASD is forecasting a relatively minor step-change in headcount between the end of RP3 and the start of RP4, which the IAA has assessed in terms of eligibility, need, additionality, and efficiency, and has accepted in part only. This increase is described in detail in Section 7 of the IAA's Decision Document, with the IAA's assessment of the substantiation also provided.

b) Other operating costs Number of entries 1

	Other operating costs building blocks	Description of the composition of		Actual	Forecast		Determined			
#	(in nominal terms in '000 national currency)	each item	Charging zones	2023	2024	2025	2026	2027	2028	2029
1	Other operating costs	Other Operating Costs consist of both	En-route charging zones	2,610	2,922	2,742	2,776	2,857	2,893	2,918
1		Core and Direct Other Operating Costs.	Terminal charging zones	653	730	685	694	714	723	729
Tot	Total other operating costs		En-route charging zones	2,610	2,922	2,742	2,776	2,857	2,893	2,918
100	ai other operating costs		Terminal charging zones	653	730	685	694	714	723	729

Accounting provisions included in total other		En-route charging zones	0	0	0	0	0	0	0
operating costs		Terminal charging zones	0	0	0	0	0	0	0
<u></u>									
Costs for ground-ground communication	N/A	En-route charging zones							
services	INVA	Terminal charging zones							
Costs for air-ground communication services	N/A	En-route charging zones							
via terrestrial link	N/A	Terminal charging zones							
Costs for air-ground communications services	N/A	En-route charging zones							
via satellite link	IN/A	Terminal charging zones							

Description of the main factors explaining the planned variations of other operating costs over the reference period

Other Operating Costs are forecast to stay largely flat (in real terms) throughout RP4. Additional costs due to increased technical support related to observation systems are offset by a downward shift in the core costs allocation key as Met Éireann's remit has grown since the beginning of RP3. More detail on Other Operating costs can be found in Section 7 of the IAA's Draft Decision and Final Decision documents.

c) Exceptional items

Number of entries	1	

	Exceptional items building blocks	Description of the composition of		Actual	Forecast		Determined				
#	(in nominal terms in '000 national currency)	each item	Charging zones	2023	2024	2025	2026	2027	2028	2029	
1	EUMETSAT		En-route charging zones	823	982	1,115	1,197	1,149	1,151	1,179	
+	EUNETSAT		Terminal charging zones	206	246	279	299	287	288	295	
Tota	Total exceptional items		En-route charging zones	823	982	1,115	1,197	1,149	1,151	1,179	
TOLA	ii exceptional items		Terminal charging zones	206	246	279	299	287	288	295	
								,			
Acco	ounting provisions included in total		En-route charging zones	0	0	0	0	0	0	0	
exce	ptional items		Terminal charging zones	0	0	0	0	0	0	0	

Description of the main factors explaining the planned variations of other exceptional items over the reference period

Costs related to the European Organization for the Exploitation of Meteorological Satellites (EUMETSAT) are outside of the control of Met Éireann as contributions by each member state are apportioned based on Gross National Income.

d) Accounting provisions

Number of entries	0

3.4.6.2 - Investment costs

a) Depreciation costs

Method adopted for the calculation of the depreciation cost (point 1.3 of Table 1):

If current cost accounting is applied, equivalent historical cost accounting figures have to be provided in Annex E in order to allow for comparison

b) Cost of capital

Description of the assumptions used to compute the cost of capital (point 1.4 of Table 1), including the composition of the asset base, the return on equity, the average interest on debts and the shares of financing of the asset base through debt and equity

MET ASD did not propose to collect a cost of capital allowance, which would be small in any case.

Cost of capital assumptions	Description of each item
NBV fixed assets	N/A
Adjustments total assets	N/A
Net current assets	N/A
Cost of capital %	N/A
Return on equity	N/A
Average interest on debts	N/A
Share of financing through equity	N/A

3.4.6.3 - Costs for VFR exempted flights

Description of the methodology and assumptions used to establish the costs of air navigation services provided to VFR flights, when exemptions are granted for VFR flights in accordance with Article 31(3), 31(4) and 31(5)

The cost of VFR flights is captured in an annual amount of €127k, consistent with previous years.

3.4.6.4 - NSA verification

Findings of the verification by the NSA (under Art. 22(7) of IR 2019/317) of the compliance of the determined costs of the ANSP with the requirements of Article 15(2) of Reg. 550/2004 and Article 22 of IR 2019/317, and where applicable identification of corrections applied to the cost base as a result of this verification

The IAA has ensured that only eligible and efficient costs, based on prudent estimates and input assumptions, are included in the determined costs for MET ASD. This has resulted in a range of adjustments and alternative assumptions being adopted, as is apparent from the descriptions elsewhere in this template and the supporting documentation.

3.4.7 - Pension assumptions

AirNav Ireland

3.4.7.1 Total pension costs, including retirement and pre-retirement schemes (in nominal terms in '000 national currency)

Pension costs per segment	2025D	2026D	2027D	2028D	2029D
En-route activity	12,852	13,344	13,612	13,930	14,144
Terminal activity	2,121	2,209	2,254	2,306	2,342
Other activities					
Total pension costs	14,973	15,553	15,866	16,236	16,486

3.4.7.2 Assumptions for the "State" pension scheme (in nominal terms in '000 national currency)

Are there different contribution rates for different staff categories? If yes, how many?	No				
		1			
<staff category="" name=""></staff>	2025D	2026D	2027D	2028D	2029D
Total pensionable payroll to which this scheme applies					
Employer % contribution rate to this scheme					
Total pension costs in respect of this scheme					
Number of employees the employer contributes for in this scheme					

Description on the relevant national pension regulations and pension accounting regulations on which the assumptions are based, as well as information whether changes of those regulations are to be expected during RP4

Not Applicable, there is no such pension scheme.

Description of the assumptions underlying the calculations of pension costs comprised in the determined costs, separately for retirement and early retirement

Describe the actions taken ex-ante to manage the cost-risk (cost increase) associated with this item, as well as the actions taken to limit the impact of the unforeseen change on the costs to be passed on to airspace users

3.4.7.3 Assumptions for the occupational "Defined contributions" pension scheme (in nominal terms in '000 national currency)

Are there different contribution rates for different staff categories? If yes, how many?			Yes-2			
DC Scheme	2025D	2026D	2027D	2028D	2029D	
Total pensionable payroll to which this scheme applies	AirNay Ireland	d has advised th	nat this data is o	commercially co	onfidential so	
		en made publi				
Employer % contribution rate to this scheme		of this tab can b				
	confidential basis.			,		
Total pension costs in respect of this scheme	1,403	1,878	2,355	2,652	3,082	
Number of employees the employer contributes for in this scheme	113	144	171	187	210	
Hybrid Scheme	2025D	2026D	2027D	2028D	2029D	
	AirNav Ireland has advised that this data is commercially confidential, so					
Total pensionable payroll to which this scheme applies	it has not been made publically available. If required, the unredacted					
	version o	of this tab can b	e provided dire	ectly to the PRE	B/EC on a	
Employer % contribution rate to this scheme	confidential basis.					
Total pension costs in respect of this scheme	2,506	2,619	2,656	2,689	2,694	
Number of employees the employer contributes for in this scheme	192	196	197	197	196	

Description on the relevant national pension regulations and pension accounting regulations on which the assumptions are based, as well as information whether changes of those regulations are to be expected during RP4

AirNav Ireland have provided the following to the IAA:

Employees who joined the company from 1 January 2012 to 30 April 2023 are members of a hybrid pension scheme, i.e. a defined benefit scheme up to a cap and a defined contribution scheme thereafter.

For employees who joined the company from 1 May 2023, the company operates a Defined Contribution scheme.

It is assumed that annual pension costs are the amounts that will be paid over in contributions by the employer to the pension fund in each year of RP4. The percentage contribution has been determined by the schemes' actuary to be compliant with the requirement to fund the pension plan on an ongoing basis and on a Minimum Funding Standard basis.

Description of the assumptions underlying the calculations of pension costs comprised in the determined costs, separately for retirement and early retirement pension schemes

Information about pension costs as a proportion of staff salaries, and contribution rates, was provided by the ANSP. In the NSA forecasts, this was combined with the changing share of total staff in each year to derive an overall pension cost.

Describe the actions taken ex-ante to manage the cost-risk (cost increase) associated with this item, as well as the actions taken to limit the impact of the unforeseen change on the costs to be passed on to airspace users

AirNav Ireland provided the following to the IAA:

All new employees are members of a defined contribution scheme which provides certainty to the airspace users of the cost of pension benefits.

The hybrid scheme includes a benefit cap, thereby managing variability of the cost of pension provision. From 1 May 2023 this scheme has been closed to new entrants and all new entrants are included in the defined contribution scheme.

3.4.7.4 Assumptions for the occupational "Defined benefits" pension scheme (in nominal terms in '000 national currency)

Are there different defined benefits schemes applicable? If yes, how many?				Yes-1		
DB scheme #1: name and short description Main Defined Benefit Schem						
Does the ANSP assume liability for meeting future obligations for the occupation	al "Defined benefits" sc	heme?		Se	lect	
	2025D	2026D	2027D	2028D	2029D	
Total pensionable payroll to which this scheme applies	it has not be	AirNav Ireland has advised that this data is commercially confidential it has not been made publically available. If required, the unredacte version of this tab can be provided directly to the PRB/EC on a confidential basis.				
Total pension costs in respect of this scheme	10,567	10,769	10,846	10,840	10,784	
- service costs (current and past)						
- net interest on the defined benefits liability /assets						
Net funding surplus/deficit						
Net funding surplus/deficit at 1 January	This data m	av ba sammara	cially confidenti	ial so it has not	t boon mada	
- benefits paid		•	ed, the unredac			
- contributions to the fund	11 1		the PRB/EC on			
Net funding surplus/deficit at 31 December	provi	ded directly to	the PRB/EC on	a confidential	Dasis.	
Actuarial assumptions						
% discount rate						
% projected increase in benefits	This data m	This data may be commercially confidential, so it has not been m				
% annual increase in salaries		•	ed, the unredac			
% expected return on plan assets	11 1					
Number of employees the employer contributes for in this scheme	ριονι	provided directly to the PRB/EC on a confidential basis.				

Description on the relevant national pension regulations and pension accounting regulations on which the assumptions are based, as well as information whether changes of those regulations are to be expected during RP4

The ANSP has provided the following information to the NSA:

Employees who joined the company prior to 1 January 2012 are members of a defined benefit contribution scheme. These schemes are subject to an actuarial valuation every three years and are funded in line with this outcome.

Description of the assumptions underlying the calculations of pension costs comprised in the determined costs, separately for retirement and early retirement pension schemes

The ANSP has provided the following to the IAA:

The pension trustees have submitted a draft of the triennial valuation, dated 1 January 2024, to the Company with a suggested ongoing Employer contribution rate. This is the rate that will apply until the next triennial valuation but, for the purposes of the Business Plan, the rate has been applied to the pensionable salaries of the member employees for the 5 years 2025 to 2029. The Employer is comitted to reviewing it's current policy in relation to reasonable increases to pensions in payment.

Describe the actions taken ex-ante to manage the cost-risk (cost increase) associated with this item, as well as the actions taken to limit the impact of the unforeseen change on the costs to be passed on to airspace users

The ANSP has provided the following information to the NSA:

From 1 January 2012 this scheme has been closed to new members, in addition the trustee's have de-risked the scheme considerabley over the years thereby providing more certainty to the cost of pension provision. The Board of AirNav Ireland decided, and communicated to all staff and pension trustees, that there would be no further increases granted on pensions payable under the scheme with effect from 01 January 2015.

${\bf 3.4.8} \hbox{ -Interest rate assumptions for loans financing the provision of air navigation services}$

AirNav Ireland

Select number of loans Select

Select number of loans	Select							
Interest rate assumptions for loans financing the provision of air navigation services								
(Amounts in nominal terms in '000 national currency)								
Other loans	2025D	2026D	2027D	2028D	2029D			
	Drop down selec	tion does not allo	w 'zero'. AirNav Ir	eland currently do	oes not have any			
Description	outstanding loans.							
Remaining balance								
Average weighted interest rate %	-	-	-	-	-			
Interest amount								
Total loans	2025D	2026D	2027D	2028D	2029D			
Total remaining balance	-	-	-	-	-			
Average weighted interest rate %	-	-	-	-	-			
Interest amount	-	-	-	-	-			

3.4.9 - Additional determined costs related to measures necessary to achieve the en route capacity targets

Additional costs of measures necessary to achieve the capacity targets for RP4?	Yes
If yes, number of en route charging zones concerned	1

a) Overall description of the measures necessary to achieve the en-route capacity targets for RP4, which induce additional costs

The key measures which the IAA has assessed to be necessary and proportionate to achieve the En Route capacity targets relate to significant investment by AirNav Ireland in its ATM systems, and in its operational staffing levels, particularly ATCOs and engineers. We have set out summary details below, and quantified the Determined Costs associated with each measure. Full details are available in the relevant sections of the IAA's Draft Decision and Final Decision documents, and, in the case of operating cost related measures, the efficiency assessment and forecasting analysis set out in the CEPA/THINK reports.

b) Detailed information on the additional costs of measures necessary to achieve the capacity targets for RP4

16						
- 1	** ** · · · · · · ·					
- 1	AirNav Ireland					
- 1	All real and a second					

AirNav Ireland					
Measure #1: Recruitment of new ATCOs	2025D	2026D	2027D	2028D	2029D
Associated additional costs (nominal terms in '000 national currency)	7,448	11,524	14,166	17,988	20,485

Description and justification of the additional determined costs of the measure

Number of capacity measures, which induce additional costs

The single biggest driver of the forecast increase in Determined Costs relates to the forecast direct staff costs of new ATCOs to be recruited. As set out in the CEPA/Think reports, we have concluded that AirNav Ireland is currently significantly understaffed in respect of ATCOs, which has led to excessive utilisation and insufficient roster resilience, the deferral of investment, and a deteriorating trend in capacity performance which has materialised as an increase in En Route ATFM delay and instances of 'zero flow rates' being imposed. The CEPA/Think forecast ATCO requirement out to 2029, while being somewhat lower than the level proposed by AirNav Ireland in its Business Plan submission, is based on an assumption of addressing this issue, while also taking account of the forecast growth in traffic during RP4, without adding excessive staff. We therefore consider this measure to be necessary and proportionate to achieve the capacity targets only to the extent accepted as necessary by the IAA, as reflected in the Determined Costs and as quantified here, rather than the higher level proposed by AirNav Ireland. We note that additional ATCO staffing was also supported by airspace users.

AirNav Ireland					
Measure #2: Recruitment of new Engineers	2025D	2026D	2027D	2028D	2029D
Associated additional costs (nominal terms in '000 national currency)	3,351	3,543	3,763	4,018	4,253

Description and justification of the additional determined costs of the measure

A second area of staffing where we and CEPA/Think assess that AirNav Ireland is understaffed is in relation to engineers. Again, on the basis that meeting safety requirements cannot be the subject of trade-offs, the primary basis upon which we concluded that this increase is necessary is to deliver the investment programme, in particular the major investments in the ATM systems. We conclude that a step increase in engineers is necessary to deliver these investments. We also conclude that AirNav Ireland's Business Plan overstated the requirement, but that our adjusted estimate can be considered necessary and proportionate to deliver the investment programme, and consequently to achieve the capacity targets. We note that our lower forecast of engineer staffing requirements was generally supported by airspace users. We have quantified the proportionate cost of this measure as €4.3m by 2029. The second measure which we have reported as being necessary and proportionate to achieve the capacity targets is therefore the step change in engineers which we forecast to be necessary over RP4.

AirNav Ireland					
Measure #3: Recruitment of new OMS staff	2025D	2026D	2027D	2028D	2029D
Associated additional costs (nominal terms in '000 national currency)	2,486	2,855	3,345	3,595	3,721

Description and justification of the additional determined costs of the measure

In its Business Plan submission, AirNav Ireland estimated that the level of Operations Management and Support (OMS) staff needed to increase to a total of 83 by 2029. This is intended to free up ATCOs and engineers from such administrative tasks, enabling the productivity of these staff to be maximised in relation to the provision of capacity and delivery of the investment programme. Through subsequent engagement, AirNav Ireland has provided further details of the specific roles being created. We and CEPA/THINK have concluded that this an efficient and proportionate measure, which partly offsets what would otherwise be a requirement for further increases in ATCOs/engineers. We conclude that this is a measure which is necessary and proportionate to achieve the capacity targets. We have quantified the cost of this measure as €3.7m by 2024.

AirNav Ireland					
Measure #4: Other Operating Cost Measures	2025D	2026D	2027D	2028D	2029D
Associated additional costs (nominal terms in '000 national currency)	3,405	4,104	4,732	3,933	3,972
Description and justification of the additional determined costs of the measure					

In relation to Other Operating costs, we have also identified a number of measures which are required to achieve the local capacity targets, either by facilitating the delivery of the ATCOs to be recruited as outlined above, or to facilitate the new ATM system. We have again estimated the proportionate cost of these measures. The largest such cost line item relates to the cost of training the required new ATCOs, which is approximately €2m per year, tailing off towards the end of RP4. There is also a forecast step increase in the cost of maintenance and spares, particularly at the end of RP4, driven by the new ATM system. We have quantified the total costs of this measure as just under €4m by 2029, and reported it as the fourth measure.

AirNav Ireland						
Measure #5: Investment in Main ATM System	2025D	2026D	2027D	2028D	2029D	
Associated additional costs (nominal terms in '000 national currency) 691 1,550 2,765 3,136 4,76						
Description and justification of the additional determined costs of the measure						

We have identified that major investment in the main ATM system is driving incremental capital costs for AirNav Ireland over RP4. Specifically, as noted elsewhere, this includes the replacement of the current ATM system with the TopSky ATC One ATM system, as well as further COOPANS builds. These projects provide for a range of enhanced functionality to support ATCO decision making, enhancing productivity, and facilitating AirNav Ireland in achieving the capacity targets. The shift towards modern, open architecture allows for new features such as Automatic Speech Recognition, Alternate Trajectories, and Conflict Resolution Advisories to be added. The automation of routine tasks is forecast to increase ATCO productivity. In our forecast ATCO requirements, the IAA has assumed ATCO productivity improvements over RP4 on the basis of this investment (and following our assessment that AirNav Ireland did not sufficiently account for this productivity improvement in its own Business Plan submission). We have quantified the capital costs of investing in the TopSky ATC One system, and in the planned COOPANS builds over RP4, at just under €5m by 2029.

AirNav Ireland						
Measure #6: Investment in Contingency ATM System 2025D 2026D 2027D 2028D 2029D						
Associated additional costs (nominal terms in '000 national currency)	0	214	835	805	900	

Description and justification of the additional determined costs of the measure

AirNav Ireland proposes to invest in a new contingency ATM system, on the basis that it is necessary to ensure that the capacity targets can be met. It will provide increased capacity when relied upon over strips, or the current contingency system, and will mean that continuity of service is assured in such instances. If this project is not delivered, there is a risk that the existing system will become unserviceable in the near future. This would lead to a reversion to a manual fallback system which would cause significant flow control issues in Irish controlled airspace. We conclude that this investment is necessary and proportionate to ensure that the capacity targets can be achieved. We have quantified the capital costs of investing in the contingency ATM system over RP4 at just under €1m by 2029.

AirNav Ireland					
Measure #7: Investment in RADAR Systems	2025D	2026D	2027D	2028D	2029D
Associated additional costs (nominal terms in '000 national currency)	71	527	1,562	1,977	2,162

Description and justification of the additional determined costs of the measure

AirNav Ireland proposes to invest in RADAR and surveillance systems, in support of the provision of air traffic control services, in particular by replacing end-of-life RADAR components that have reached end-of-life. The IAA has verified the end-of-life status of these components, as set out in sections 15 of the Draft Decision and Final Decision. The IAA notes that AirNav Ireland cannot provide a 5NM or 3NM radar separation service without sufficient reliable radar coverage. Procedures in place to cope with the loss of RADARs typically require increased separations, leading to reduced capacity and productivity. Our cost forecasts and capacity targets rely on the availability of such coverage. We therefore conclude that this investment is necessary and proportionate to achieve the capacity targets. We have quantified the capital cost of this investment at just over £2m by 2029.

AirNav Ireland					
Measure #8: Minor Investments Necessary for Capacity	2025D	2026D	2027D	2028D	2029D
Associated additional costs (nominal terms in '000 national currency) 22 134 364 1,024 1,63					1,621
Description and justification of the additional determined costs of the measure					

We have also identified a number of smaller capacity related investments that primarily contribute to AirNav Ireland's ability to train ATCOs, maintain existing navigational equipment to ensure capacity is not compromised, and service or support the investments in the ATM systems.

The building extensions to both the Ballycasey and Dublin ACCs will increase capacity for test and proving facilities needed to implement new systems. The classroom capacity that will be added to both centres is necessary to deliver the future ATC service and will cater for the additional staff members which we have included in the Opex forecasts, as outlined above.

AirNav Ireland proposes to invest in the resilience of systems needed for service provision featuring a range of different power supplies. Modular UPS supporting TopSky ATC One will provide more resilient and scalable back-up power supplies to all ATC positions and will be more scalable to support TopSky ATC One systems. Similarly, the PV Installation is intended to ensure service continuity, and consequently capacity, is not impacted in the event of national power outages. By introducing fibre feeds in place of microwave links at certain remote sites, AirNav Ireland is working to ensure that capacity is not compromised during extreme weather conditions.

AirNav Ireland's investments in the NOKIA Service Aggregation Routers, Air Traffic Management Surveillance Tracker and Server (ARTAS) and Surveillance Analysis Support System for ATC Centres (SASS-C) projects are with a view to ensuring that AirNav Ireland continues to provide 5NM and 3NM RADAR separations. The ARTAS and SASSC systems in particular are needed to support the introduction of the new ATM system referenced above.

Finally, AirNav Ireland also proposes to invest in Distance Measuring Equipment (DME) to support En Route services in the event of Global Navigation Satellite System (GNSS) outages. We note that in the event of a GNSS outage, AirNav Ireland would need to rely on conventional NavAids to ensure that capacity is not constrained

We conclude that the above investments are necessary and proportionate to achieve the capacity targets. We have quantified the total capital costs of these investments as €1.6m by 2029.

	2025D	2026D	2027D	2028D	2029D
Total additional costs of measures ('000 national currency)	17.474	24.450	31.533	36.476	41.875

c) Detailed information on the additional costs of measures necessary to achieve the capacity targets for RP4 by nature by ANSP

Additional costs of measures necessary to achieve the capacity targets for RP4 (nominal terms in '000 national currency)						
Ireland	2025D	2026D	2027D	2028D	2029D	
Staff	13,285	17,922	21,274	25,602	28,459	
of which, pension costs	2,033	2,720	3,177	3,750	4,110	
Other operating costs	3,405	4,104	4,732	3,933	3,972	
Depreciation	279	1,083	2,825	3,482	5,487	
Cost of capital	505	1,342	2,702	3,459	3,956	
Exceptional items						
Total additional costs of measures	17,474	24,450	31,533	36,476	41,875	
	2025D	2026D	2027D	2028D	2029D	
Total additional costs of measures ('000 national currency)	17,474	24,450	31,533	36,476	41,875	

Additional comments	

d) Demonstration that the deviation from the Union-wide targets is exclusively due to the additional determined costs related to measures necessary to achieve the performance targets in capacity

To assess whether the deviation from the target trends is exclusively due to these measures, the IAA has converted the operating cost-related measures to real 2022 prices, and recalculated the DUC trend net of these measures. In that case, the short-term DUC trend reduces to -2.9%, and the long-term DUC trend reduces to -1.7%. These align with, and outperform, the EU-wide target trends of -1.2% and -1% respectively. We therefore conclude that the deviation from the target trends is exclusively driven by the additional determined costs of measures which are necessary and proportionate to achieve the En Route capacity targets.

3.4.10 - Restructuring costs

${\bf 3.4.10.1}\ Restructuring\ costs\ from\ previous\ reference\ periods\ to\ be\ recovered\ in\ RP4$

estructuring costs from previous reference periods approved by the European Commission?	No
.4.10.2 Restructuring costs planned for RP4	
estructuring costs foreseen for RP4?	No
dditional comments	

SECTION 3.5: ADDITIONAL KPIS / TARGETS

3.5 Additional KPIs / Targets

Annexes of relevance to this section

ANNEX J. OPTIONAL KPIS AND TARGETS

3.5 - Additional KPIs / Targets

SECTION 3.6: DESCRIPTION OF KPAS INTERDEPENDENCIES AND TRADE-OFFS INCLUDING THE ASSUMPTIONS USED TO ASSESS THOSE TRADE-OFFS

3.6 - Description of KPAs interdependencies and trade-offs including the assumptions used to assess those trade-offs

- ${\bf 3.6.1}$ Interdependencies and trade-offs between safety and other KPAs
- 3.6.2 Interdependencies and trade-offs between capacity and environment
- 3.6.3 Interdependencies and trade-offs between cost-efficiency and capacity
- 3.6.4 Other interdependencies and trade-offs

3.6 - Description of KPAs interdependencies and trade-offs including the assumptions used to assess those trade-offs

3.6.1 - Interdependencies and trade-offs between safety and other KPAs

a) With regard to the over-riding safety objectives, what pressures does your organisation experience in meeting the cost, capacity and environmental KPAs? Describe how you ensure that these pressures do not negatively impact safety within your organisation. Describe the mitigation measures that have been introduced to demonstrate that safety performance has been sustained and what monitoring has been envisaged to measure the effectiveness of those mitigations.

While a trade-off between the Safety KPA and other KPAs exists, the importance of ensuring the required level of operational safety and safety management means that this interdependency should be reflected more as an input than a trade-off. In practice, this usually means including cost forecasting assumptions which are consistent with fully meeting the required levels of safety. It is then for AirNav Ireland to ensure, as it has outlined in its Business Plan, that where any such potential trade-offs arise, these are managed such that the required levels of safety is not compromised.

As to mitigation measures to ensure that safety performance is sustained and the monitoring of same by the IAA, AirNav Ireland did not achieve the target for safety risk management (SRM) during RP3. AirNav Ireland has put in place a project plan under the leadership of the Safety Manager to achieve Level D in SRM and maintain Level C or better in all other components during RP4. AirNav Ireland has documented this requirement as a Safety Objective which is reviewed at their Safety Review Board. AirNav Ireland has also directly assigned staff to safety management positions which will increase efficiencies of incident investigation and reporting (and the IAA has also taken account of this in the cost forecasts).

AirNav Ireland is also in the process of updating its SMS Training Programme to include Safety Assessment of Change Management Training within the programme which will facilitate the assurance that staff are trained and competent to perform their functions. AirNav Ireland will work to improve on its review of audit and survey trend analysis.

The IAA's risk-based oversight methodology indicated that increased scrutiny of AirNav Ireland's safety management processes was warranted and so the IAA has undertaken additional audits and inspections of the ANSP. Meetings and workshops on safety management system processes have also been held between the IAA and AirNav Ireland to provide for better safety performance.

b) What are the main assumptions used to assess the interdependencies between safety and other KPAs? Please provide a detailed analysis.

Describe the analysis methodology and the data that has been used to assess the interdependencies between safety and other KPAs. What indicators, in addition to those described in the Regulation, are used for monitoring during the reference period to ensure that the targets in the KPAs of capacity, environment, and cost-efficiency are not degrading safety?

The required level of safety (as well as capacity and environment) performance have been used as inputs to the level of determined costs forecast by the IAA, such that those forecasts are consistent with AirNav Ireland having sufficient resources to meet the required levels of safety (and also service quality). This is the appropriate way to assess and take account of the referenced interdependency. For example, cost forecasts for RP4 allow for an additional 7 engineering staff that we concluded would be necessary to meet the requirements of EU Regulation 2017/373. Furthermore, the NSA factored the need to invest in safety performance (eg ASMGCS at Cork and Shannon airports) into its allowance of AirNav Ireland's capital investment programme.

In the context of other KPAs, all necessary costs should be incurred in order to achieve the required level of safety performance, irrespective of whether the funds and resources associated with these costs could yield greater improvements in performance in other KPAs (or adversely affect performance in other KPAs).

In terms of indicators, the IAA monitors a range of Safety Performance Indicators (SPIs), including the rate of Runway Incursions and Separation Minima Infringements. For the defined SPIs, there are associated safety targets and alert thresholds to provide quantifiable measures for the maintenance and/or improvement of the level of safety for the air navigation services domain. This methodology is developed to identify an Acceptable Level of Safety Performance (ALOSP) and is aligned with ICAO Doc 9859.

c) Describe the organisation's philosophy for managing competing priorities between the KPAs effectively – for instance delaying programmes to manage competing demands. It is expected that the organisation uses its business risk management processes to assess the consequential risks of the organisation's competing priorities to achieve its business goals.

AirNav Ireland has confirmed in its Business Plan that any decisions which include consideration of interdependencies or trade-offs between safety and other KPAs, will be managed such that the required level of safety performance will not be compromised. See in particular section 3.4 of the AirNav Ireland Business Plan.

d) What trade-offs in safety have been accepted to manage resources shortfalls in realising the organisation's objectives to meet the cost, capacity and environment KPA targets? Have trade-offs restricted the release of staff for safety activities, such as safety training (ATC training excepted), safety surveys, safety audits, safety assessments, safety studies and analyses?

Historically, AirNav Ireland has achieved both its Environment targets and En Route capacity targets. Although the KEA target was not met in 2023, this can be attributed to mitigating circumstances that were largely outside of AirNav Ireland's control. This implies that if additional resources were required in order to maintain safety performance, the capacity KPA targets could, up to a point, still be achieved with fewer resources. However, as noted above, given that safety performance is the primary priority, the resources required to maintain safety performance will be provided, even if this is at the expense of other KPA targets.

The IAA's cost forecasts are intended to allow AirNav Ireland to efficiently meet the required level of safety performance, safety activities such as training, and also fully meet the capacity targets. This draft Performance Plan for RP4 does not envisage or assume trade-offs in safety activities in order to improve capacity and/or cost efficiency performance (and it is not apparent that any such potential trade-off arises in practice in relation to the environment KPA). In its Business Plan, AirNav Ireland has outlined the additional staff positions it intends to assign to ensure improved safety performance. This includes allocating staff on a permanent basis to Accident Occurrence Investigation (AOI), who were previously included in the ATCO roster. AirNav Ireland has identified that additional staff is needed to improve the timeliness of accident occurrence investigations and to improve coordination of the organisation's safety and security activities. The IAA has taken account of these cost drivers in the cost forecasts underpinning the Determined Costs.

e) Has the State reviewed the ANSP financial and personnel resources that are needed to support safe ATC service provision through safety promotion, safety improvement, safety assurance and safety risk management in line with planned changes that will enable targets in other KPAs to be achieved? Please provide a detailed explanation.

As part of developing the RP4 draft Performance Plan, as well as using the required level of performance as inputs to the cost forecasts, the NSA has undertaken a financial viability and stress test assessment of AirNav Ireland. This is in line with our standard approach to regulatory price controls. Based on financial projections, AirNav Ireland's coverage ratios are well within a sustainable range and, even under a scenario of an unplanned increase in operating costs, the ratios remain within a sustainable range and within the Revolving Credit Facilities already in place.

AirNav Ireland's Business Plan reiterates its focus on safety, stating that safety remains its 'ultimate priority'. AirNav Ireland referenced the interdependency of safety and cost efficiency and stressed the need for sufficient funds to ensure safety performance. From our assessment, it is clear that AirNav Ireland will have sufficient funds to ensure resourcing need not impact on safety, even if it were to be unable to fully meet the cost efficiency targets in doing so.

Therefore, the NSA is confident that even in the event of a severe downside scenario where actual costs exceed Determined Costs to a significant extent, the assumed level of Determined Costs will generate a revenue stream which is sufficient to enable the financial viability of AirNav Ireland and the achievement of the other KPA targets. While we have set cost forecasts which we consider achievable, even if AirNav Ireland is unable to fully meet the cost efficiency KPA targets, performance in the other KPAs does not need to be degraded. It is therefore the NSA's view that, in the event that AirNav Ireland is unable to meet all KPA targets simultaneously, all necessary costs should be incurred to achieve the required level of safety performance, irrespective of whether the funds and resources associated with these costs would lead to a deterioration in the cost efficiency KPA. The financeability of the AirNav Ireland regulated entity is discussed further in Section 12 of the Final Decision.

3.6.2 - Interdependencies and trade-offs between capacity and environment

Less capacity and more congested airspace imply that airspace users have less ability to use the most efficient flight routing and, conversely, more capacity implies more efficient flight paths can be facilitated. In that regard, the IAA has reviewed the recent PRB study on the interdependency between capacity and environment which estimated that an increase of 1 minute of En Route ATFM delay per flight causes an increase of 0.14 percentage points in the KEA.

Therefore, while performance in these KPAs appears to be interdependent, there does not appear to be an inherent trade-off. AirNav Ireland stated in its RP4 Business Plan that by sufficiently increasing capacity, this will also contribute to positive performance in the Environment KPA, demonstrating the correlation between the two KPAs. From that perspective, and particularly given the relatively limited levers available to AirNav Ireland to further improve KEA performance directly, it appears that the primary environment trade-off is one of an indirect nature with cost efficiency, through the capacity and cost efficiency trade-off described below.

3.6.3 - Interdependencies and trade-offs between cost-efficiency and capacity

For an ANSP operating efficiently, providing additional capacity will incur additional costs. However, establishing a relationship between cost efficiency and capacity is not straightforward in practice as there are a number of dimensions to consider.

The relationship between cost efficiency (as measured by the DUC) and ANSP-attributable delay is partly lagged, with additional capacity being significantly linked to investment in infrastructure or training of additional ATCOs, both of which have lead times of several years (although some additional capacity can be provided in the short term through, for example, additional overtime). There can also be a trade-off between current capacity and future capacity, where current capacity may be impacted by a requirement to resource the delivery of an investment programme which will ultimately lead to improvements in future capacity (such as, for example, AirNav Ireland's planned investment in the TopSky ATC One system during RP4). Such investment in future capacity is also an investment in future productivity and thus cost efficiency.

In its Business Plan, AirNav Ireland has laid out what it sees as the critical features needed to provide sufficient capacity. This includes delivering sufficient ATCO resources (reduced reliance on overtime, demand from staff for a better work-life balance, allowances for job-sharing, statutory and annual leave, etc.), and delivering a Capex programme which will allow it to cope with forecast traffic growth.

Ideally, capacity targets should be set at the optimum point where the marginal cost associated with any additional reduction in delay exceeds the marginal economic benefits associated with any further delay reduction. In practice, it is challenging to identify this optimum, given the extent of current and future uncertainties associated with the inputs to any such analysis. We have nonethess taken this interdependency into account by, in particular, proposing capacity targets which we consider to be appropriately challenging but not premised on eliminating all ATFM delay. Equally, we have sought to develop cost forecasting assumptions which are consistent with reversing the trend of increasing ATFM delay and delivering very low ATFM delay levels over RP4, in particular through significant investment in the ATM systems and in additional ATCO and engineering staff. Further detail on the cost-efficiency and capacity trade-offs are contained in Sections 12 and 13 of the Draft Decision and the Final Decision.

3.6.4 - Other interdependencies and trade-offs					

SECTION 4: CROSS-BORDER INITIATIVES AND SESAR IMPLEMENTATION

4.1 - Cross-border initiatives and synergies

- 4.1.1 Cross-border areas where the ANSP provides ANS outside the State's charging zone(s) in the scope of the performance plar
- 4.1.2 Planned or implemented cross-border initiatives at the level of ANSPs
- 4.1.3 Investment synergies achieved at FAB level or through other cross-border initiatives
- 4.2 Deployment of SESAR Common Projects (CP1)
- 4.3 Change management

Annexes of relevance to this section

ANNEX N. CROSS-BORDER INITIATIVES
ANNEX V. CONSISTENCY OF INVESTMENTS WITH ATM MASTER PLAN

4.1 - Cross-border initiatives and synergies at the level of the ANSP(s)

4.1.1 - Cross-border areas where the ANSP(s) provide(s) services outside of the State's charging zone(s) in the scope of the performance plan

As indicated in section 1.1.1, the cross-border area(s) reported below are those cross-border areas or groups of adjacent cross-border areas of a size above 500 km2, unless the area or group of areas concerned has fewer than 7,500 controlled flight movements on average per year.

Number of cross-border area(s) where the ANSP(s) of the Member State provide(s) services in another State's charging zone(s)

Cross-border area(s) #1	Isle of Man (IOM) sector and L18 conditional route	Situated in:		London FIR		
Geographical scope of the cross-border area(s)	Two areas to the east of Dublin over the Irish Sea, with vertical limits from FL55/85/145 to FL245 only. Control of traffic above FL245 is not delegated.					
Rationale for establishing the cross-border area, including performance benefits	Dublin Airport is situated very close to the Ireland-UK FIR boundary. ATS delegation in the IoM sectors and the L18 conditional route, to the east of Dublin Airport at the FIR boundary, gives AirNav's ATCOs approximately 25% extra time and space to manage approximately 50% of Dublin Airport related traffic, alleviating what otherwise would be a capacity constraint, thereby enhancing ATCO productivity and reducing cost for AirNav Ireland. In addition, the delegation facilitates enhanced environment performance, in particular KEA, CCO, and CDO.					
Size of the cross-border area (km2)	1,250 km2 and 548 km2, respectively, but	only within o	ertain flight le	evels.		
Estimated annual number of flights	100,000					
Estimated annual number of SUs, if available	-					
Description of the services provided by the ANSP in the cross-border area						
Air Traffic Control Service						
Annual cost incurred by the ANSP for the pro	ovision of services in the cross-border	2025	2026	2027	2028	2029
					Net saving	

Methodology used to estimate/establish these costs

It is difficult to precisely quantify the cost savings to AirNav Ireland generated by the provision of services in these boxes by AirNav Ireland without fully establishing a counterfactual re-designed airspace without the delegation box. THINK ATM consultancy has carried out a study in 2023 on the cost, capacity, and environment effects of the delegation arrangements, which estimated that this arrangement provides a 24% capacity benefit on the Irish side of the FIR boundary, which, if current capacity/environment performance were to be maintained by AirNav Ireland, would therefore require a significant increase in ATCO resourcing in the absence of the delegation. This report can be made available, if helpful.

Have these costs been excluded from the determined costs in the scope of the performance plan?

No

No, such (negative) costs have not been excluded. If viewed from the perspective of a counterfactual scenario where no delegation arrangement was in place, as outlined above, this would lead to higher determined costs, all else equal. Alternatively, if viewed from the perspective of the total square kilometres of airspace in which delegation arrangements exist to/from the Irish charging zone, the total almost exactly balances out at c8,500km2 both ways, given that Donegal airspace above FL245 is delegated to NATS. From that perspective, either, there is not any justification to adjust the determined costs up or down for the purposes of a balancing item from a cost allocation perspective.

Description of the financial arrangements in place to cover these costs

All benefits and (net negative) costs have been included within the draft Performance Plan assumptions.

Additional comment

It can be noted that the environment and capacity benefits of this arrangement have also been included in the draft Performance Plan, given that those targets are based on a level of performance and productivity which has been facilitated by the delegation. Although details on the delegation of airspace from the Irish charging zone to other ANSPs has not been requested in this template, it can be noted that Donegal airspace in the North West of the Irish FIR has been delegated to NATS above FL245. This prevents a situation where transatlantic traffic crossing Northern Ireland is briefly handed over to AirNav Ireland, before being handed back to NATS, which leads to cost savings for AirNav Ireland.

Cross-border area(s) #2	BANBA Box	Situated in:	London FIR				
Geographical scope of the cross-border	Located off the south east coast of Ireland, from FL195 to FL660, only.						
area(s)							
Rationale for establishing the cross-border area, including performance benefits	The BANBA box is located at a three way London FIR. The traffic flows across the a short time frame. The box of delegated ai report has assessed that, in the absence owould be increased, and there would also and less optimal trajectories. Although the would likely be ripple effects on AirNav Ir delays on the ground at Cork and less optimal trajectories.	rea are multidimensional, v rspace is used to manage th of the BANBA box, the coord be knock-on impacts for N ese impacts would primaril' eland impacting Cork and D	with flights climbing and descending in a nat complex flow of traffic. The THINK dination workload with the UK sectors ATS, resulting in reduction in capacity y affect and be attributed to NATS, there publin airports, including outbound				

Size of the cross-border area (km2)	2,222 km2							
Estimated annual number of flights	55,000 to 62,000	55,000 to 62,000						
Estimated annual number of SUs, if	-							
available								
Description of the services provided by the ANSP in the cross-border area								
Air Traffic Control Service								
Annual cost incurred by the ANSP for the pro	2025	2026	2027	2028	2029			
area	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain			
Methodology used to estimate/establish these costs								

Aside from the benefit to NATS in the case of this delegation, it is difficult to specifically quantify the level of cost which would be required for AirNav Ireland to deliver the equivalent levels of capacity and environment performance in a counterfactual scenario in which this delegation arrangement was not in place, relative to the incremental cost to AirNav Ireland of providing ATS in this box (above FL195 only). Based on the THINK analysis, it appears likely to also be net negative.

Have these costs been excluded from the determined costs in the scope of the performance plan?

No

No- as noted above, the associated determined costs are likely net negative if viewed from a counterfactual perspective, or alternatively zero/negligible if viewed from a kilometre squared balancing item perspective across all delegated airspace.

Description of the financial arrangements in place to cover these costs

All benefits and costs have been included within the draft Performance Plan assumptions.

Additional comment

Cross-border area(s) #3	TAKAS Box	Situated in:		London FIR				
Geographical scope of the cross-border	Located to the south of Ireland adjacent to the Shannon Oceanic Transition Area (SOTA) and French airspace,							
area(s)	from FL245 to FL660 only.	om FL245 to FL660 only.						
	The TAKAS box is used in conjunction with the LARLA triangle (which is delegated from NATS to the French							
	DSNA) to transfer traffic directly between	the Shannor	South Oceani	c (SOTA) and	l Brest ACCs, v	vithout the		
	need for a very short intervention by NAT	ΓS. The absen	ce of this box v	would result	in a series of r	rapid transfers		
Rationale for establishing the cross-border	from DSNA to NATS to AirNav Ireland for	westerly fligh	its, and vice ve	rsa for easte	rly flights, lea	ding to a		
area, including performance benefits	collective increase in workload. Additiona	ally, this arrar	ngement enabl	es efficient r	outing of nort	:h-south		
	traffic from Ireland and Scotland to Spain	•		•		alysis, lead to		
	a deterioration in the horizontal flight eff	iciency of the	se routes in th	ie Shannon F	IR.			
Size of the cross-border area (km2)	4,595 km2							
Estimated annual number of flights	20,000 to 24,000							
Estimated annual number of SUs, if	-							
available								
Description of the services provided by the A	NSP in the cross-border area							
Air Traffic Control Service								
Annual cost incurred by the ANSP for the pro	ovision of services in the cross-border	2025	2026	2027	2028	2029		
area		Uncertain	Uncertain	Uncertain	Uncertain	Uncertain		
Methodology used to estimate/establish the	se costs							
Aside from the benefit to NATS in the case o	•		-		•			
Ireland as outlined above, it is difficult to spe			•					
level of environment performance in a countries of a regulating ATS in this boy (above 5)	_	n arrangemer	it was not in p	iace, relative	to the cost to	Alrivav		
Ireland of providing ATS in this box (above FI	L195 only).							
Have these costs been excluded from the determined costs in the scope of the performance plan?								
No- see above.								
Description of the financial arrangements in	place to cover these costs							
All benefits and costs have been included wi	thin the draft Performance Plan assumption	ons.						
Additional comment								
i e e e e e e e e e e e e e e e e e e e								

4.1.2 - Planned or implemented cross-border initiatives at the level of ANSPs

Number of cross-border initiatives	1		

	Initiative #1				
Name	COOPANS				
Description	COOPANS is an international partnership that includes AirNav Ireland and ANSPs from five other states (Austria, Croatia, Denmark, Portugal and Sweden). COOPANS has a common managerial approach, whereby the six ANSPs act as one organisation together with the supplier (Thales).				
Expected performance benefits	Across all KPAs- see below.				
Additional comments					

4.1.3 - Investment synergies achieved at FAB level or through other cross-border initiatives

Details of synergies in terms of common infrastructure and common procurement

The COOPANS partnership allows for the delivery of common ATM systems and functionality intended to steadily enhance safety and productivity. This also allows for economies of scale and common ATM systems, as 'builds', or packages of functionality, are agreed by the COOPANS Board, allowing for common development, integration, deployment, and maintenance. System incidents that occur in one ANSP can be remedied accross all the partners, before they cause service interruptions for other ANSPs.

AirNav Ireland has previously estimated that, as a result of the COOPANS partnership it has saved €50m since 2011.

4.2 - Deployment of SESAR Common Projects (CP1)

CP1 ATM Functionality (CP1-AF)/ Sub- functionality (CP1-s-AF)	Target date of implementation	Date of actual/expected deployment of s-	Description of realised and/or planned investment(s) related to the deployment of s-AF	Relevant investments (Ref. # as per section 2)	RP4 determi		ted to the sub-A	•	currency and
runctionality (CF 1-5-AF)	implementation	AF	related to the deployment of 3-Ai	# as per section 2)	2025	2026	2027	2028	2029
CP1-AF1 - Extended AMAN and Integrated AMAN	/DMAN in High-De	nsity TMAs							
CP1-s-AF1.1 AMAN extended to en-route airspace	31/12/2024	15th October 2024	Current COOPANS System is capable. Deployment of AMAN functionality and reconfiguration of existing ATM System to exchange the required information.	N/A					
CP1-s-AF1.2 AMAN/DMAN Integration	31/12/2027	N/A	N/A	N/A					
CP1-AF2 - Airport Integration and Throughput									
CP1-s-AF2.1 DMAN synchronised with predeparture sequencing	31/12/2022	31/12/2022	Deployment of IATS system at Dublin included the pre departure sequencer functionality.	N/A					
CP1-s-AF2.2.1 Initial airport operations plan (iAOP)	31/12/2023	31/12/2024* *ACDM part	This is an airport operator (daa) deliverable. A pre- requisite for this is the implementation of ACDM including the connection with the Network Manager (NM). Airnav Ireland is working with daa to implement ACDM as an enable for daa to complete this AF. The IATS PDS functionality was upgraded to improve the ACDM performance. Testing with the NM is ongoing.	N/A					
CP1-s-AF2.2.2 Airport operations plan (AOP)	31/12/2027		daa deliverable.						
CP1-s-AF2.3 Airport safety nets	31/12/2025	31/12/2025	Upgrade of IATS system required and planned	N/A (not a major project)					
CP1-AF3 - Flexible Airspace Management and Free	Route Airspace								
CP1-s-AF3.1 Airspace management and advanced flexible use of airspace	31/12/2022	31/12/2022	NM system for ASM capabilities has been adopted. CIAM token installed. FMP/AMC function is currently performed by NATS on behalf of Airnav Ireland, this will be performed by Airnav Ireland from 2026 (as explained elsewhere in the Performance Plan documentation).	N/A					
CP1-s-AF3.2 Free route airspace	31/12/2025	31/12/2025	Current COOPANS system is compliant.	N/A					
CP1-AF4 - Network Collaborative Management		1				ı		ı	ı

CP1-s-AF4.1 Enhanced short-term ATFCM			NMP Flow Application is in use.			
measures	31/12/2022	31/12/2022		N/A		
CP1-s-AF4.2 Collaborative NOP	31/12/2023	31/12/2024* *ACDM part	Use of NM technical platform through NATS agreement in place. As noted above, FMP/AMC function is currently performed by NATS, this will be performed by AirNav Ireland from 2026. The current Coopans system is compliant. The Initial AOP/NOP Information sharing family is a daa deliverable, a pre-requisite for this is the implementation of ACDM including the connection with the NM. AirNav Ireland is working with daa to implement ACDM as an enable for daa to complete this AF. The IATS PDS functionality was upgraded to improve the ACDM performance. Testing with the NM is ongoing.	N/A		
CP1-s-AF4.3 Automated support for traffic complexity assessment	31/12/2022	31/12/2022	Airnav CHMI tokens upgraded to incorporate NMP FLOW Application	N/A		
CP1-s-AF4.4 AOP/NOP integration	31/12/2027	31/12/2027	daa deliverable. AirNav Ireland is working with daa to implement ACDM as an enable for daa to complete this AF.	N/A		
CP1-AF5 - SWIM	ı					
CP1-s-AF5.1 Common infrastructure components	31/12/2024	31/12/2024	SWIM Platform	N/A		
CP1-s-AF5.2 SWIM yellow profile technical infrastructure and specifications	31/12/2025	31/12/2025	SWIM Platform	N/A		
CP1-s-AF5.3 Aeronautical information exchange	31/12/2025	2029	EAD upgrade SmartSIS System - DNOTAM & AIF Topsky ATC One IATS CASDS	Major investments #A1, #A5 Not available		
CP1-s-AF5.4 Meteorological information exchange	31/12/2025	2029	Topsky ATC One IATS CASDS SmartMessenger AMHS SmartSIS System - DNOTAM, MET & AIF Met Converter	Major investments #A1, #A5 Not available		
CP1-s-AF5.5 Cooperative network information exchange	31/12/2025	2029	Topsky ATC One IATS Upgrade CASDS	Major investments #A1, #A5 Not available		
CP1-s-AF5.6 Flight information exchange (yellow profile)	31/12/2025	2029	Topsky ATC One IATS Upgrade CASDS	Major investments #A1, #A5 Not available		
CP1-AF6 - Initial Trajectory Information Sharing					,	

CP1-s-AF6.1 Initial air-ground trajectory information sharing	31/12/2027	2029	Topsky ATC One Major investments #A1, #A5	Not available				
CP1-s-AF6.2 Network Manager trajectory information enhancement	31/12/2027	2029	NM deliverable					
CP1-s-AF6.3 Initial trajectory information sharing ground distribution	31/12/2027	2029	Topsky ATC One Major investments #A1, #A5	Not available				
Total RP4 determined costs for common project related to the sub-functionalities across charging zones for the concerned entity 0 0 0 0						0	0	

4.3 - Change management

Change management practices and transition plans for the entry into service of major airspace changes or for ATM system improvements, aimed at minimising any negative impact on the network performance

AirNav Ireland's change management procedures are approved by the Competent Authority so as to be compliant with Regulation (EU) 2017/373. The change management practices and transition plans are documented in Safety Assessment of Change Manual and associated procedures. The ANSP has ensured that all staff involved in change management practices are trained and competent by completing approved training courses.

In accordance with Regulation (EU) 2017/373, the life cycle of the change spans from definition to operations, including transition into service. The ANSP, as part of change management procedures, ensures that the safety criteria:

(1) are justified for the specific change, taking into account the type of change;

(2) when fulfilled, predict that the functional system after the change will be as safe as it was before the change, or the air traffic services provider shall provide an argument justifying that:

(i) any temporary reduction in safety will be offset by future improvement in safety; or

(ii) any permanent reduction in safety has other beneficial consequences

AirNav Ireland uses the Safety Assessment of Change Manual (SACM)-001 to present the requirements and guidance for safety assessments of changes to the ATM/ANS Functional System for use by practitioners of safety in the ANSP. The manual consolidates all existing requirements and guidance material, some of which was previously contained in appendices to SP400 procedures.

EU Regulation 2017/373 requires that a safety assessment is performed when there is a change to any element of the ATM/ANS Functional System (i.e. people, procedures, equipment) or the operational environment in which services are provided (i.e. changes to airspace structure, traffic characteristics, etc.). AirNav Ireland uses safety assessments that follow a series of steps outlined in the SACM and the results are documented and distributed in a safety case according to the provisions of SP403 (major changes) or SP406/ENG-001 (minor changes). The safety case provides assurance that the safety criteria identified for the change will be satisfied and will remain satisfied i.e. that the change will be and will remain acceptably or tolerably safe.

The safety assessment is conducted by the ANSP's operational units that are introducing the change. For changes to ATM engineered systems, the change is led by Technical Services. For cross-boundary changes, the change is led by the ATM Operations and Strategy Directorate. Responsibility for the conduct of the assessment may be delegated as necessary.

Safety assessments may also be carried out by another organisation, on the ANSP's behalf, however, the responsibility for the safety assessment remains with the ANSP. The safety assessment when completed and notified to the Competent Authority before implementation, in accordance with extant ASAM 038 requirements. Where the Competent Authority decides to review a notified change, the change may not be implemented until approval has been granted.

Ops normal is always considered to be the case, as that is the baseline functions/services that are provided. Transition plans aim to safely manage a new system into service. If the safety assessment of their introduction necessitates restrictions, then they will be included, otherwise it is Ops normal.

It is not possible to guarantee that there will be no impact on the network on the introduction of TOPSKY1. AirNav Ireland has stated that, for safety reasons, it may be obliged to introduce regulation for a limited period of time to ensure that there is sufficient capacity to deal with any potential teething problems with the technology and also to allow ATCOs build a level of confidence with the system as they begin to use TOPSKY1 in live operations.

AirNav Ireland has stated that this will be taken into account in the safety case for the introduction of TOPSKY1. The extent of any regulations will depend on the amount of training required to transition to the new system which will be determined by a training needs analysis, and the extent of the differences between how the ATCOs interact with the current system, compared to TOPSKY1. At this time, it is not possible to confirm the extent and duration of any regulation that might be required, but AirNav Ireland has stated that the impact on airspace users and on the network will be kept to the minimum necessary.

SECTION 5: TRAFFIC RISK SHARING ARRANGEMENTS AND INCENTIVE SCHEMES

5.1 - Traffic risk sharing parameters

- 5.1.1 Traffic risk sharing En route charging zones
- 5.1.2 Traffic risk sharing Terminal charging zones

5.2 - Capacity incentive schemes

- 5.2.1 Capacity incentive scheme Enroute
 - a) Parameters for the calculation of financial advantages or disadvantages En route
 - b) Pivot values En route
 - c) Modulation mechanism (if applicable)
- 5.2.2 Capacity incentive scheme Terminal
 - a) Parameters for the calculation of financial advantages or disadvantages En route
 - b) Pivot values Terminal
 - c) Modulation mechanism (if applicable)

5.3 - Optional incentives

Annexes of relevance to this section

ANNEX G. PARAMETERS FOR THE TRAFFIC RISK SHARING

ANNEX I. PARAMETERS FOR THE MANDATORY CAPACITY INCENTIVES

ANNEX K. OPTIONAL INCENTIVE SCHEMES

5.1 - Traffic risk sharing

5.1.1 Traffic risk sharing - En route charging zones

Ireland			Traffic risk-sharing	no		
			Service units lower than plan		Service units h	igher than plan
	Dand band	Risk sharing band	% loss to be	Max. charged if	% additional	Min. returned if
	Dead band		recovered	SUs 10% < plan	revenue returned	SUs 10% > plan
Standard parameters	±2.00%	±10.0%	70.0%	5.6%	70.0%	5.6%

5.1.2 Traffic risk sharing - Terminal charging zones

Ireland - TCZ			Traffic risk-sharing	no			
•			Service units lower than plan		Service units h	higher than plan	
	Dandhand	Risk sharing band	% loss to be	Max. charged if	% additional	Min. returned if	
	Dead band		recovered	SUs 10% < plan	revenue returned	SUs 10% > plan	
Standard parameters	±2.00%	±10.0%	70.0%	5.6%	70.0%	5.6%	

5.2 - Capacity incentive schemes

5.2.1 - Capacity incentive scheme - En route

a) Parameters for the calculation of financial advantages or disadvantages - En route

En route	Expressed in	Value
Dead band Δ	fraction of min	±0 minutes
Max bonus (≤2%)	% of DC	0.00%
Max penalty (≥ Max bonus)	% of DC	1.00%

b) Pivot values - En route

Basis for the annual setting of pivot values	Fixed (equal to performance targets)

c) Modulation mechanism (if applicable)

Section to be filled out only if the option for modulated pivot values has been selected under b) above.

Modulation mechanism of pivot values	Click to select

Based on the modulation mechanism(s) selected above, provide a detailed description of the principles and methodology used to modulate the pivot values

Option A) - Modulation based on unforeseen changes in traffic

1) the pivot value for the year N is equal to the yearly update of reference values provided by the Network Manager in the NOP	Click to select	
2) the pivot value for year N is informed by the yearly update early update of reference values by the Network Manager in the NOP	Click to select	
If 2) applies describe the principle and formulas on the basis of which the pivot values are calculated		

Option B) - Modulation limiting pivot values to C, R, S, T, M, P delay codes

The scope of the incentives is limited to delay causes related to ATC capacity, ATC routing, ATC staffing, ATC equipment, airspace management and special events with the codes
C, R, S, T, M and P of the ATFCM user manual
Explanation on the methodology used to modulate the pivot values accordingly

Additional information in the case of the combination of A) and B)

If the modulation of pivot values is based on both options A) and B) above, provide additional information on how these two modulation mechanisms are applied in combination		
with each other		

5.2.2 - Capacity incentive scheme - Terminal

a) Parameters for the calculation of financial advantages or disadvantages - Terminal

Terminal	Expressed in	Value
Dead band Δ	fraction of min	0 minutes
Max bonus (≤2%)	% of DC	0.00%
Max penalty (≥ Max bonus)	% of DC	1.00%

b) Pivot values - Terminal

Basis for the annual setting of pivot values	Modulated

c) Modulation mechanism (if applicable)

Section to be filled out only if the option for modulated pivot values has been selected under b) above.

Modulation mechanism of pivot values	B) Limited to CRSTMP delay causes

Based on the modulation mechanism(s) selected above, provide a detailed description of the principles and methodology used to modulate the pivot values

Option A) - Modulation based on unforeseen changes in traffic

The pivot value for year N is modulated in order to enable significant and unforeseen changes in traffic to be taken into account	No
Description the principle and formulas on the basis of which the pivot values are calculated	

Option B) - Modulation limiting pivot values to C, R, S, T, M, P delay codes

The scope of the incentives is limited to delay causes related to ATC capacity, ATC routing, ATC staffing, ATC equipment, airspace management and special events with the codes C, R, S, T, M and P of the ATFCM user manual

Explanation on the methodology used to modulate the pivot values accordingly

We have set the total arrival ATFM delay targets at 0.2 minutes for each year of RP4. Historically, the majority of arrival delay has not been ANSP attributable. We therefore intend to set the modulated pivot values of 0.1 minutes of delay per flight but limited to CRSTMP delay only. We have set a deadband of 0 minutes such that the penalty to AirNav Ireland will become payable if the pivot value is exceeded due to CRSTMP delay. The scheme is penalty-only.

Additional information in the case of the combination of A) and B)

If the modulation of pivot values is based on both options A) and B) above, provide additional information on how these two modulation mechanisms are applied	d in combination
with each other	

SECTION 6: IMPLEMENTATION OF THE PERFORMANCE PLAN

- 6.1 Monitoring of the implementation plan
- 6.2 Non-compliance with targets during the reference period

6 - IMPLEMENTATION OF THE PERFORMANCE PLAN

6.1 Monitoring of the implementation plan

Description of the processes put in place by the NSA to monitor the implementation of the Performance Plan including the yearly monitoring of all KPIs and PIs defined in Annex I of the Regulation and a description of the data sources

The IAA will monitor the performance of the regulated entities on an ongoing basis. On safety, the IAA will continue to conduct an annual review of the EoSM questionnaire, based on actual outcomes each year and impose remedial measures in any areas of noncompliance with the targets. The IAA also monitors a range of Safety Performance Indicators (SPIs), including the rate of Runway Incursions and Separation Minima Infringements. For the defined SPIs, there are associated safety targets and alert thresholds to provide quantifiable measures for the maintenance and/or improvement of the level of safety.

The IAA will continue to monitor the performance on Capacity and Environment (based on data from the NM) and strive to ensure that measures are taken to meet the performance targets. The IAA will hold regular meetings with AirNav Ireland to review data on taxi time and ASMA metrics and discuss any ATM factors that may impact performance. The IAA is also the competent authority for the purposed of the Slot Regulation EC 95/93, and is responsible for setting the slot coordination parameters at Dublin Airport. It is familiar with the broad range of factors that influence such PIs. On KEA, the IAA will continue to have regular performance review meetings to discuss progress on any actions which might be able to improve AirNav Ireland's performance, following a deterioration in the KEA score at the end of the previous reference period.

On cost efficiency, the IAA will monitor actual costs and financial performance through a review of regulated entity accounts and audits of the eligibility of reported actual costs. The NSA will ensure the under spend of the RP3 capex programme is returned to users in the manner agreed, throughout RP4, as has already been consulted on and included in the tables and forecast unit rates for RP4. We will monitor and report actual expenditure on and delivery of RP4 projects, at an individual project level. We will publish biannually on our website a report which focuses on what projects have been delivered or are progressing, material changes, and how expenditure is tracking against the Performance Plan assumptions.

6.2 Non-compliance with targets during the reference period

Description of the processes put in place and measures to be applied by the NSA to address the situation where targets are not reached during the reference period

If any performance shortfalls are identified, the NSA will make enquiries with the entity concerned, conduct a root-cause analysis and introduce potential corrective measures. The NSA will then monitor the implementation and impact of the corrective measures to determine their effectiveness. All protocols for reporting variances and corrective measures to other stakeholders or oversight bodies will be formally documented. The NSA will hold regular meetings with the entity in question and offer support to ensure the targets are not repeatedly missed. The NSA will consider whether the performance shortfalls warrant further scrutiny of the entity's protocols and internal processes. The NSA could explore further meetings, workshops and potential audits if necessary.

7 - ANNEXES

ANNEX A. REPORTING TABLES & ADDITIONAL INFORMATION (EN-ROUTE)

ANNEX A.x - En route Charging Zone #x

ANNEX B. REPORTING TABLES & ADDITIONAL INFORMATION (TERMINAL)

ANNEX B.x - Terminal Charging Zone #x

ANNEX C. CONSULTATION

ANNEX D. LOCAL TRAFFIC FORECASTS

ANNEX E. INVESTMENTS

ANNEX F. BASELINE VALUES (COST-EFFICIENCY)

ANNEX G. PARAMETERS FOR THE TRAFFIC RISK SHARING

ANNEX H. RESTRUCTURING MEASURES AND COSTS

ANNEX I. PARAMETERS FOR THE MANDATORY CAPACITY INCENTIVES

ANNEX J. OPTIONAL KPIS AND TARGETS

ANNEX K. OPTIONAL INCENTIVE SCHEMES

ANNEX L. JUSTIFICATION FOR SIMPLIFIED CHARGING SCHEME

ANNEX M. COST ALLOCATION

ANNEX N. CROSS-BORDER ANS

ANNEX O. JUSTIFICATIONS FOR THE LOCAL SAFETY TARGETS

ANNEX P. JUSTIFICATIONS FOR THE LOCAL ENVIRONMENT TARGETS

ANNEX Q. JUSTIFICATIONS FOR THE LOCAL CAPACITY TARGETS

ANNEX R. JUSTIFICATIONS FOR THE LOCAL COST-EFFICIENCY TARGETS

ANNEX S. INTERDEPENDENCIES

ANNEX T. OTHER MATERIAL

ANNEX U. VERIFICATION BY THE NSA OF THE COMPLIANCE OF THE COST BASE

ANNEX V. IMPLEMENTATION OF ATM MASTER PLAN

ANNEX Y. RESPONSES TO COMPLETENESS VERIFICATION

ANNEX Z. CORRECTIVE MEASURES