Consultation on Actual Air Navigation Services Costs 2025

23 July 2026

Table of Contents

1. About this Consultation

1.1 In this document we are consulting on three aspects required under Implementing Regulation (EU) 317/2019 ("the Regulation") laying down the current performance and charging scheme.[1] The three aspects of the consultation are:

- The actual costs incurred in 2025 associated with the provision of En Route services and Terminal air navigation services in Ireland at the state airports Dublin, Cork and Shannon;
- The intended En Route and Terminal unit rates for 2027;
- The costs exempt from the cost risk sharing mechanism relating to 2025.

1.2 The consultation consists of two steps. First, a videoconference meeting on 11 August 2026 from 1400-1700 Irish time (1500-1800 CET). Second, we are seeking any written feedback or comments by 1700 on 18 August 2026. Written feedback should be marked 'Response to Consultation on 2025 Actual ANS Costs' and sent to consultation@iaa.ie.

1.3 We may correspond with those who make submissions, seeking clarification or explanation of their submissions. Ordinarily we place all submissions received on our website. If a submission contains confidential information, it should clearly be marked as confidential and a redacted version suitable for publication should also be provided.

1.4 We do not ordinarily edit submissions. Any party making a submission has sole responsibility for its contents and indemnifies us in relation to any loss or damage of whatever nature and howsoever arising suffered by us as a result of publishing or disseminating the information contained within the submission.

1.5 In preparing this consultation, we:

- Obtained from all relevant parties the actual 2025 detailed cost data which allows us to compare actual costs with determined costs for the 2025 regulatory period.
- Assessed the drivers of any differences between determined and actual costs for 2025.
- Verified the correct application of the cost risk sharing mechanism during 2025.

1.6 Following this consultation, the 'Costs Exempt' submission will be provided to the European Commission. The final Unit Rates and Determined Costs tables will then be submitted to the Central Route Charges Office (CRCO) ahead of the Enlarged Committee on Route Charges in November.

1.7 This document is organised as follows, Section 2 will provide background information and context on the plan for Reference Period 4 (RP4), Section 3 will give an overview of the actual costs, and Section 4 will detail the intended Unit Rates for 2027.

[1] COMMISSION IMPLEMENTING REGULATION (EU) 2019/ 317 - of 11 February 2019 - laying down a performance and charging scheme in the single European sky and repealing Implementing Regulations (EU) No 390 / 2013 and (EU) No 391 / 2013

2. Background

2.1 The Regulation provides for the setting of Union-wide performance targets for the provision of air navigation services in the areas of Safety, Capacity, Environment and Cost Efficiency. The targets for RP4 were set by the European Commission in June 2024 by Commission Implementing Decision (EU) 2024/1688.[2] National Supervisory Authorities (NSAs) then develop a draft Performance Plan, setting local targets which contribute to the achievement of the Union-wide targets. The IAA is the National Supervisory Authority (NSA) for Ireland under the SES Regulations.

2.2 In June 2024 the regulated entities, AirNav Ireland and MET Aviation Services Division (ASD) submitted RP4 Business Plans and investment programmes to the NSA. A cost submission in relation to the proposed NSA costs was also provided. The submissions, as well as guidance material from the European Commission, were assessed by the NSA, which then published a draft decision on the Irish draft RP4 Performance Plan in July 2024. Following conclusion of the consultation period, the RP4 Draft Performance Plan was submitted by the NSA in October 2024.

2.3 In March 2025, the Performance Review Body ('PRB') of the Single European Sky published its assessment of the draft Performance Plans submitted on behalf of all Member States. The PRB recommended that the Safety, Capacity and Environment targets proposed by the IAA should be approved. The PRB concluded that the cost-efficiency targets in the draft Performance Plan should not be approved by the European Commission on the basis that the short- and long-term Determined Unit Cost (DUC) trend is inconsistent with the Union-wide targets. On 16 May 2025, the European Commission included the Irish draft Performance Plan among those found to be inconsistent with the Union-wide cost efficiency target.[3]

2.4 The draft Performance Plan was revised by the NSA in July 2025 consistent with Article 14 of the Regulation. A consultation was held on 29th July 2025. The consultation document for the revised draft Performance Plan proposed a number of possible scenarios to revise the draft Performance Plan and assessed the impact such adjustments would have on various aspects of the plan. In response to the findings of the PRB, the consultation document also provided further details on the additional measures considered necessary to meet the capacity targets in the RP4 Performance Plan and their associated costs above a 'business as usual' scenario.[4]

2.5 Following conclusion of the consultation period the revised RP4 Draft Performance Plan was submitted by the NSA in August 2025. Following a verification of completeness process, in April 2026 the European Commission assessed that the revised RP4 Performance Plan was consistent with the Union-wide targets. The Final RP4 Performance Plan was adopted by the Member State in June 2026.

2.6 Material relating to the RP4 Performance Plan and each consultation is available on the IAA website.[5] The NSA also publishes the AirNav Ireland regulatory accounts and updates on the progress of its capital investment plan.[6]

---

[2] Commission Implementing Decision (EU) 2024/1688 of 12 June 2024 setting Union-wide performance targets for the air traffic management network for the fourth reference period from 1 January 2025 to 31 December 2029
[3] https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32025D1040
[4] 'Business-as-usual' staffing level is 2023 outturns. For measures relating to investments to achieve the capacity targets, these are investments in systems which have not been made for 15-20 years, and so are not 'Business-as-usual.
[5] Performance Plan for RP4
[6] https://www.iaa.ie/commercial-aviation/economic-regulation/air-navigation-charges/regulatory-reporting-1

3. Summary of Actual Costs Incurred in 2025

3.1 In this section we outline the actual costs of air navigation services incurred in 2025 and the difference between the actual and determined costs contained in the RP4 Performance Plan.[7] This is required under Article 24 (3) of the Regulation.

3.2 We have verified the eligibility of the cost categories included for En Route and Terminal services. These are aligned with the categories used for the determined costs in the Performance Plan. En Route services cover air navigation in the Shannon Flight Information and Upper Information Regions (FIR/UIR) and exclude the Shanwick Oceanic airspace. Terminal services cover air navigation during approach, landing, take-off and departure provided at Dublin, Cork and Shannon airports.

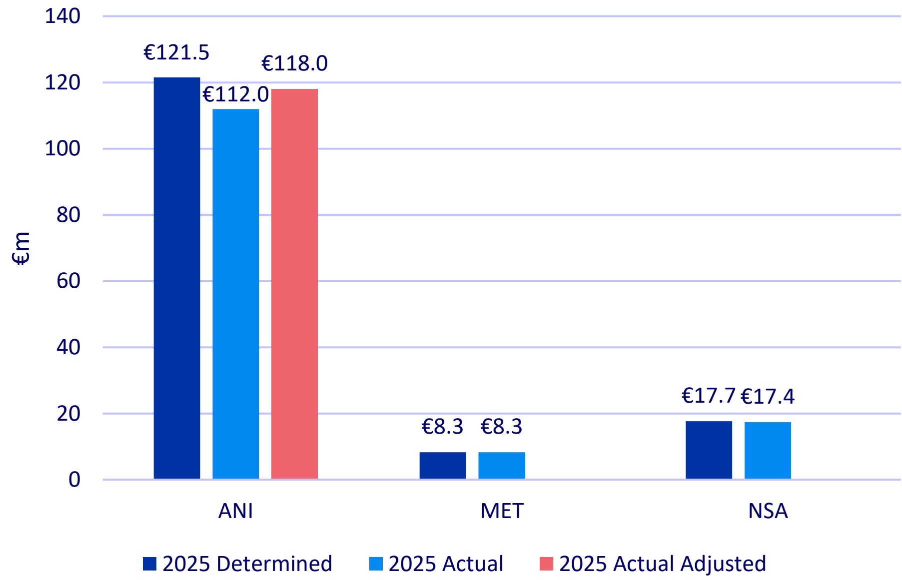
3.3 Below we lay out the En Route and Terminal costs by entity.

En Route Costs

3.4 In nominal terms, total actual En Route costs in 2025 were €147.7m, which is -6.4% (€10.1m) less than determined costs of €157.8m. We note that the nominal determined costs within the Performance Plan for 2025 are based on an inflation index forecast of 108.6 (base 100 in 2022); the actual inflation index in 2025 was 108.8 (i.e. 0.2% higher). This slight variation will be adjusted for in future unit rates as provided for in the Regulation.

3.5 In real terms (2022 prices) the difference between actual and determined costs is similar to the nominal variation as outturn inflation was similar to forecast. Total actual costs in 2025 of €137.7m were 6.6% below the real determined costs in the RP4 Performance Plan.[8] Figure 3.1 shows the actual and determined costs by entity in real terms.

Figure 3.1: Actual and Determined En Route Total Costs, 2025



Source: Reported costs in real terms (2022 prices) based on financial data from AirNav Ireland, IAA, and Met Éireann, IAA Calculations.

[7] Article 2 of the Regulation defines actual cost as "*a cost actually incurred in a calendar year for the provision of air navigation services which are subject to certified accounts or, in the absence of such certified accounts, subject to a final audit*". Determined costs are the cost base for En Route and Terminal charges established according to the Regulation prior to the start of each reference period, as part of the performance plans.
[8] As per the Regulation, capital costs are not converted to real prices.

AirNav Ireland

3.6 In nominal terms, the actual AirNav Ireland costs of €121.2m represent 82.1% of the total actual costs and were 7.5% (-€9.9m) lower than 2025 determined costs. Total actual staff costs of €78.9m were 5% (-€4.1m) below determined. The variance arose primarily from the timing of the planned recruitment and the timing of the 2025 pension in payment. While the approval for this payment was not received in time to include in the 2025 accounts, AirNav Ireland does not anticipate any further such delays in the remainder of the regulatory period. We estimate the En Route portion of this payment to be less than €3m.

3.7 As part of the revised RP4 Performance Plan, the NSA introduced capacity targets to deliver actual staffing levels in line with the ATCO and Engineer forecasts in the Performance Plan, together with associated financial incentive schemes. The targets are set on an annual basis, and actual annual performance is measured consistent with the determined cost forecast and capacity measures calculations, as an annual average headcount. The incentive schemes are penalty only and only relate to En Route. In 2025 this payroll rebate amounts to €3.7m as AirNav Ireland's recruitment of ATCOs and Engineers was below the target amount. The rebate will be returned to airspace users in 2027 through a reduction in the En Route unit rate.

3.8 Other Operating costs consist of training, systems and equipment maintenance, telecommunications, spares, power and administration costs including rent and rates, insurance, security, building repairs and maintenance. In 2025 actual Other Operating costs of €33.8m were 8.2% below determined (-€3m). Overall, while AirNav Ireland's total operating costs were €7.2m lower than determined (-6%) in 2025, it anticipates that any savings in this area will be offset by increased spending in subsequent RP4 years.[9]

3.9 In 2025 Depreciation costs of €5.9m were 21% below determined (-€1.6m). Similarly, the actual Cost of Capital of €2.6m is 29.8% lower than the determined level (-€1.1m). AirNav Ireland states that the lower than planned depreciation and cost of capital reflect a shortfall in technical and operational resources necessary to deliver capital projects.

3.10 In Figure 3.1 we also estimate a 2025 Actual Adjusted scenario for AirNav Ireland. As described in Section 2, and referenced above, the ATCO/Engineer staffing level incentive schemes resulted in a €3.7m rebate based on average headcount in 2025. We also estimate that the deferred 2025 pension in payment will result in an increase to En Route pension costs over the remainder of the period. We consider that while both of these payments were not incurred in 2025, they relate to the 2025 determined cost base and will be incurred by AirNav Ireland in this regulatory period. In the 2025 Actual Adjusted we add the pension in payment amount and the staffing rebate to the actual outturn 2025 costs. In this scenario, we estimate total (real 2022) costs of €118m which is €3.5m (2.9%) less than the determined level of €121.5m.

Table 3.1: Determined vs Actual Costs, 2025

	Total Cost	Variance with Determined	
2025 Determined	€121.5m		
2025 Actual	€112.0m	-€9.5m	-7.8%
2025 Actual Adjusted	€118.0m	-€3.5m	-2.9%

Source: IAA Calculations, AirNav Ireland, 2022 Prices

[9] Total operating costs is the sum of staff and other operating costs.

Met Eireann Air Services Division (Met ASD)

3.11 Met ASD actual costs of €9m represent 6.1% of total ANS actual costs and were close to the determined level (-0.1%). Other Operating costs of €2.6m were 8.7% below the determined level (-€0.25m). The underspend was offset by outturn Exceptional Item spend which was 13.8% (€0.15m) above the determined level due to the increased cost of satellite data relative to what was expected during RP4 planning.

NSA/State/Eurocontrol

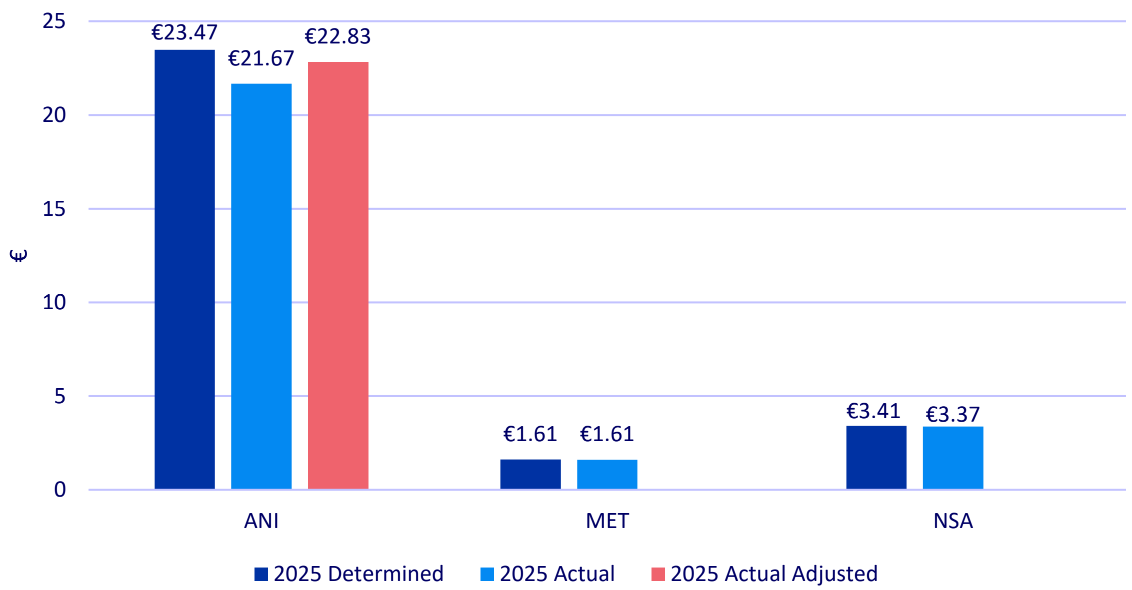
3.12 The actual NSA/State/Eurocontrol costs of €17.4m represent 11.8% of the total actual costs and were 1.4% below the determined level (-€0.25m). Actual Depreciation costs of €0.067m were less than half of the determined level €0.18m. This was largely due to a later than anticipated capitalisation of the NSA's largest capital project, MySRS.

3.13 Actual Supervision costs were 2% below determined (-€0.11m) while actual Eurocontrol costs were 1% below the determined level (-€0.09m).

Real Unit Cost

3.14 Figure 3.2 show the real actual and determined En Route unit cost for each entity in 2025.

Figure 3.2: Actual and Determined En Route Unit Costs, 2025



Source: Reported costs in real terms (2022 prices) based on financial data from AirNav Ireland, IAA, and Met Éireann, IAA Calculations.

3.15 The actual 2025 En Route unit cost, in real terms, was €26.64, which is 6.5% (€1.85) lower than the determined unit cost. While total En Route Service Units of 5.17m were slightly below forecast (-0.13%), this was more than offset by the lower than determined actual costs which has resulted in an overall actual unit cost which is less than the determined level.

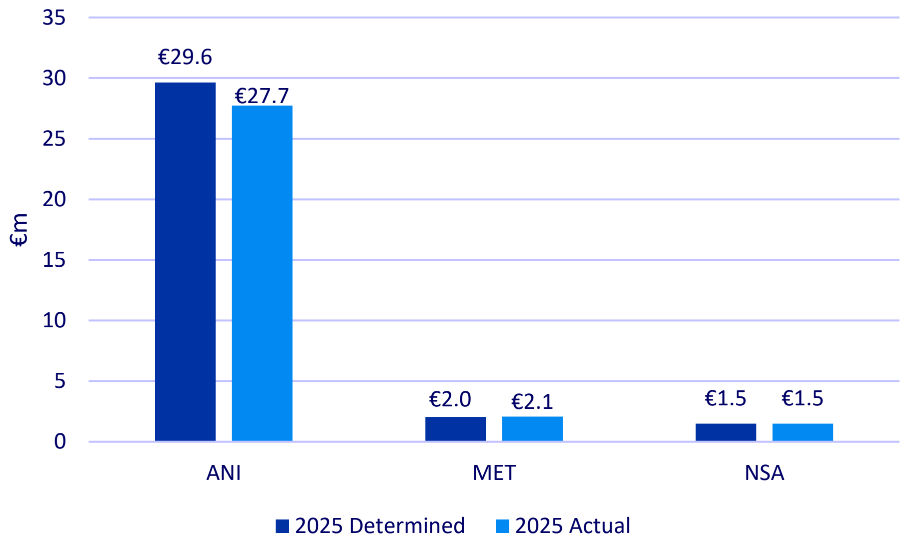
3.16 Similar to the total costs section above we calculate an adjusted real unit cost for AirNav Ireland by accounting for the 2025 pension in payment and the staffing rebate. We estimate a 2025 adjusted real unit cost of €22.83 for AirNav Ireland which is just €0.64 less per unit (-2.7%) than the determined unit cost of €23.47. In this scenario, the total unit cost would be €27.81 which is €0.69 per unit below the determined level.

Terminal Costs

3.17 In nominal terms, total Terminal costs in 2025 were €33.3m, which is 5.3% lower than total determined costs of €35.1m (-€1.9m). As noted above, nominal determined costs within the Performance Plan for 2025 are based on an inflation index forecast of 108.6 in 2025 (base 100 in 2022); the actual inflation index in 2025 was 108.8. This slight variation will be adjusted for in future unit rates as provided for in the Regulation.

3.18 In real terms (2022 prices) the total actual Terminal costs of €31.3m in 2025 were 5.6% lower than RP4 determined costs for 2025. Figure 3.3 shows the actual and determined costs for each entity in real terms.

Figure 3.3: Actual and Determined Terminal Total Costs, 2025



Source: Reported costs in real terms (2022 prices) based on financial data from AirNav Ireland, IAA, and Met Éireann.

AirNav Ireland

3.19 In nominal terms, the actual AirNav Ireland Terminal costs of €29.5m represent 88.7% of the total ANS actual costs and were, overall, 6.1% (€1.9m) lower than the determined costs. The main drivers of lower actual costs were lower than determined Depreciation and Cost of Capital. Depreciation costs across the year were 14% (€0.69m) lower than determined due to project delays and what AirNav Ireland cites as a shortfall in technical and operational resources necessary to deliver capital projects. The Cost of Capital was 13% (€0.54m) lower than determined costs for the same reasons. The underspend in RP4 Terminal capital costs will be returned to airspace users over RP5.

3.20 Staff costs of €14m were slightly above the determined level in 2025 (+€0.14m), however there was a variation in pension costs of -€0.7m due to the delayed 2025 pension in payment which accounts for more than 50% of the Terminal pension cost underspend. Other Operating costs of €7.7m were 10% (-€0.8m) below the determined level of €8.5m. As with En Route above, AirNav Ireland expects to increase spending in this area throughout the period.

Met Eireann Air Services Division (Met ASD)

3.21 The 2025 actual costs of Met Éireann ASD of €2.3m represent 6.8% of total actual ANS costs and were 1.5% (€0.03m) higher than determined costs. This difference was driven primarily by higher-than-expected subscription cost for satellite data.

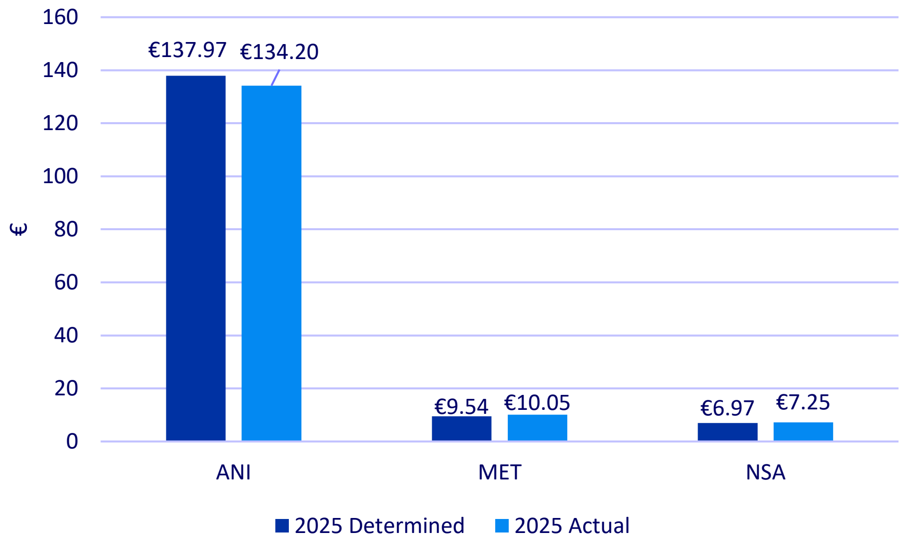
NSA/State/Eurocontrol

3.22 The actual NSA and State costs of €1.5m represent 4.5% of total Terminal ANS costs in 2025 and were broadly aligned to the overall determined figure. Other Operating costs were 2% above the determined level largely due to higher-than-expected Other State costs. Actual depreciation of €0.014m was considerably lower than planned (€0.035m). This variance is primarily due to a later than estimated capitalisation process of a software platform (MY SRS).

Real Unit Cost

3.23 The actual 2025 unit cost, in real terms, of €150.5, was 1.9% (-€2.97) lower than the 2025 determined unit cost of €154.47. While actual Terminal Service Units were 3.7% below the forecast level, the less than determined total actual costs resulted in a unit cost below the determined level. Figure 3.4 shows the actual and determined costs for each entity in real terms.

Figure 3.4: Actual and Determined Terminal Unit Costs, 2025



Source: Reported costs in real terms (2022 prices) based on financial data from AirNav Ireland, IAA, and Met Éireann.

Costs Exempt

3.24 This section sets out further detail on potential costs exempt from risk sharing. This must be reported to the European Commission and is ultimately reflected in the Unit Rates. These categories, reported in nominal terms below, are:

- Investments
- Pension costs
- NSA/State/EUROCONTROL costs
- Interest Rates

3.25 Of these, the default position is that cost differences related to investment and NSA/State/Eurocontrol are passed through to unit rates, whereas this would only be considered in exceptional circumstances in the other two areas.

Investments

3.26 En Route, actual AirNav Ireland Depreciation costs of €5.9m were 21% (€1.6m) lower than the determined Depreciation costs of €7.4m. Actual Cost of Capital of €2.6m was -30% (€1.1m) lower than the determined Cost of Capital of €3.8m, due to a shortfall in resources as discussed above.

3.27 Actual Terminal AirNav Ireland Depreciation costs of €4.1m were 14% (€0.7m) lower than determined costs of €4.8m. Actual Cost of Capital of €3.7m was 13% (€0.5m) lower than the determined costs of €4.2m. This was largely due to the same resource constraints referenced above.

Table 3.2: AirNav Ireland Actual vs Determined Capital Costs for 2025

	2025 Determined (€m)	2025 Actual (€m)
En Route Depreciation	7.4	5.9
En Route Cost of Capital	3.8	2.6
Terminal Depreciation	4.8	4.1
Terminal Cost of Capital	4.2	3.7

Source: AirNav Ireland, IAA Calculations

3.28 In the development of the RP4 Performance Plan, the NSA considered that the planned timeline for the delivery of AirNav Ireland's Capital Investment Plan 2025-2029 was ambitious and would likely not be met in full. While we did not disallow any individual project, we instead applied a programme level reduction. Initially, the capital cost remuneration assumption in the Performance Plan was based on 80%, rather than 100% of the Capital Investment Programme being delivered to the planned timeline in AirNav Ireland's Business Plan. In the revised Performance Plan, following consultation with stakeholders, we changed the adjustment to allow for 70% of the proposed capital costs. Investment in the new ATM system TopSky ATC One was not subject to this adjustment.

3.29 For MET ASD En Route actual Depreciation costs of €0.5m in 2025 were slightly (1.6%) above the determined level of €0.49m. Similarly for Terminal, actual depreciation of €0.13m for 2025 was just above the determined level of €0.12m (+5.5%). No Cost of Capital is charged in relation to MET ASD assets.

Table 3.3: MET ASD Actual vs Determined Capital Costs for 2025

	2025 Determined (€m)	2025 Actual (€m)
En Route Depreciation	0.49	0.50
Terminal Depreciation	0.12	0.13

Source: MET ASD, IAA Calculations

Pensions Costs

3.30 Article 28(3)(c) provides for the exemption arising from '*unforeseen and significant changes in pension costs established in accordance with Article 22(4) resulting from unforeseeable changes in national pensions law, pensions accounting law or unforeseeable changes in financial market conditions*.' No such changes have been reported for assessment by the NSA; thus, no Unit Rate adjustment is included in respect of pension costs.

3.31 AirNav Ireland's actual En Route pension costs of €8.1m were 36% (€4.6m) lower than the determined pension costs of €12.7m. While this is consistent with a lower-than-expected headcount it is mostly driven by the pensions-in-payment underspend for 2025. Similarly, actual Terminal pension costs of €1.4m were €0.7m (33%) below determined pension costs of €2.1m for the same reasons. We anticipate outturn pension costs in 2026 to exceed the RP4 determined level to reflect the deferred payment.

3.32 Met ASD actual En Route pension costs of €0.72m, were slightly higher (+€0.02m) than the determined pension costs of €0.70m, an increase of 3.2%. Actual Terminal pension costs of €0.18m were just above the determined level of €0.17m (+2.8%). The variation is consistent with the marginally higher than determined actual MET staff costs.

NSA/State/Eurocontrol Costs

3.33 Actual En Route NSA/State/Eurocontrol costs for 2025 of €17.4m were 1.4% (€0.25m) below determined. Both Supervision and Eurocontrol costs were below the determined levels. NSA En Route Depreciation costs accounted for the greatest percentage variation as actual costs of €0.07m amounted to just 38% of the determined €0.18m. This is related to a later than anticipated capitalisation of the NSA's largest capital project, MySRS.

Interest Rates on Loans

3.34 This is not applicable and no amounts have been proposed to the NSA for assessment.

4. Summary of the Calculation of Intended 2027 Unit Rates

4.1 In this section we consult on the intended 2027 Unit Rates. This is required under Article 30 of the Regulation.

En Route

4.2 The intended 2027 Unit Rate for En Route services is €32.79. This is 5.2% lower than the 2026 Unit Rate of €34.60. This rate is approximately €0.45 higher per unit than would have been the case had adjustments not been applied to the total determined costs for En Route for 2027. The adjustments are defined in the Regulation and serve to increase the nominal determined costs by approximately €2.43m, before the Unit Rate is calculated.

4.3 Row 11 of Table 4.1 shows that the total costs applicable for the En Route Unit Rate calculation are €175.4m after adjustments. They are 1.4% higher than the determined costs calculated for 2027, as shown in Row 1 (€173m). Rows 2 to 10 show the applicable adjustments.

- Row 2: Inflation adjustment relating to 2025 in accordance with Article 25 (2)(b) of the Regulation
- Row 3: Traffic risk sharing adjustment is nil as the variation between forecast and actual service units in 2025 was less than 2%, in accordance with Article 25 (2)(c) of the Regulation
- Row 4: The adjustment relates to the difference between actual and determined Eurocontrol and competent authority costs in 2025.
- Row 5: The adjustment relates to the ATCO/ Engineer headcount incentive rebate incurred by AirNav Ireland in 2025.
- Row 7: The adjustment relates to 2025 in accordance with Article 25 (2)(g) and (h) of the Regulation
- Row 8: The adjustment relates to Other Revenues reported by AirNav Ireland including funds from commercial activities and public funding.
- Row 10: The adjustment is a combination of the recovery of permitted unrecovered revenues resulting from the COVID-19 emergency measures and which are spread over a seven-year period from 2023 to 2029 and the temporary application of the 2025 Unit Rate due to the late adoption of the RP4 Performance Plan in accordance with Article 29 (5) of the Regulation.[10]

Table 4.1: Applicable En Route Unit Rate for 2027

	Total	ANI	MET	NSA/State
1. Determined costs in nominal terms - VFR excl. (Art. 25(2)(a))	€173.0m	€145.1m	€9.4m	€18.4m
2. Inflation adjustment: amount carried over to year n (Art. 25(2)(b))	€0.2m	€0.2m	€0.02m	-
3. Traffic risk sharing adjustment: amounts carried over to year n (Art. 25(2)(c))	-	-	-	-
4. Differences in costs as per Art. 28(4) to (6): amounts carried over to year n (Art. 25(2)(d))	-€0.2m	-	-	-€0.2m
5. Financial incentives: amounts carried over to year n (Art. 25(2)(e))	-€3.7m	-€3.7m	-	-
6. Modulation of charges: amounts carried over to year n (Art. 25(2)(f))	-	-	-	-

[10] Article 29 (5) states that "*Where a performance plan is adopted after the start of the reference period, any difference in revenue due to the application of the unit rate or unit rates calculated on the basis of the draft performance plan, instead of the unit rate or unit rates calculated on the basis of the adopted performance plan, shall result in a first adjustment of the unit rate in the year following the adoption of the performance plan and a final adjustment of the unit rate two years after that year*".

7. Traffic adjustments: amounts carried over to year n (Art. 25(2)(g) and (h))	€0.1m	€0.01m	€0.01m	€0.03m
8. Other revenues (Art. 25(2)(i))	-€1.7m	-€1.7m	-	-
9. Cross-financing between charging zones (Art. 25(2)(j))	-	-	-	-
10. Difference in revenue from temporary application of unit rate (Art. 25(2)(k))	€7.8m	€5.7m	€1.1m	€0.9m
11. Grand total for the calculation of year n unit rate	€175.4m	€145.7m	€10.6m	€19.1m
12. Forecast total service units for year n (performance plan)	5.35m	5.35m	5.35m	5.35m
13. Unit rate for year n as per Art. 25(2) (in national currency)	€32.79	€27.23	€1.98	€3.57

Source: Reported En Route tables based on costs as per financial data from ANI, IAA, and Met Éireann.

4.4 The intended 2027 Unit Rate is not inclusive of the return of AirNav Ireland's unspent capex from 2025 which will be returned to users over the RP5 period. In its submission AirNav Ireland proposes a return of €2.7m in unspent capex relating to the year 2025 for En Route.

Terminal

4.5 The intended 2027 Unit Rate for Terminal services is €167.72. This is a slight reduction (-0.02%) from the 2026 Unit Rate of €167.75. This Unit Rate is €3.09 lower than would have been the case had adjustments not been applied to the total determined costs for the Unit Rate calculation. The adjustments are defined in the Regulation and serve to reduce the nominal determined costs by approximately €0.7m, before the Unit Rate is calculated.

4.6 As with Table 4.1, row 11 of Table 4.2 shows that the total costs applicable for the Terminal Unit Rate calculation are €37.9m after adjustments. This is 1.8% lower than the determined costs calculated for 2027, as shown in Row 1 (€38.6m). Rows 2 to 10 show the applicable adjustments.

- Row 2: Inflation adjustment relating to 2025 in accordance with Article 25 (2)(b) of the Regulation
- Row 3: Application of the traffic risk sharing adjustment in 2025 in accordance with Article 25 (2)(c) of the Regulation. Terminal Service Units were 3.7% below the forecast level. Article 27 (3) provides that "*Where, over a given year n, the actual number of service units falls below the service unit forecast included in the performance plan for that year n by more than 2 %, 70 % of the resulting revenue loss incurred by the air navigation service provider or providers concerned in excess of 2 % of the difference between the actual service units and that forecast shall be recovered from airspace users, through adjustments of the unit rates in year n+2*."
- Row 4: The adjustment relates to the return of AirNav Ireland's unspent capex from RP3 and the difference in competent authorities' costs from 2025.[11]
- Row 7: The adjustment relates to 2025 in accordance with Article 25 (2)(g) and (h) of the Regulation
- Row 8: The adjustment relates to Other Revenues reported by AirNav Ireland including funds from commercial activities and public funding.
- Row 10: The adjustment is a combination of the recovery of permitted unrecovered revenues resulting from the COVID-19 emergency measures and which are spread over a seven-year period from 2023 to 2029 and the temporary application of the 2025 Unit Rate due to the late

[11] The NSA decided to spread the return of unspent Terminal capital costs from RP3 across RP4 to generate a more stable profile of Unit Rates.

adoption of the RP4 Performance Plan in accordance with Article 29 (5) of the Regulation as explained in the En Route section.

Table 4.2: Applicable Terminal Unit Rate for 2027

	Total	ANI	MET	NSA/State
1. Determined costs in nominal terms - VFR excl. (Art. 25(2)(a))	€38.6m	€34.7m	€2.3m	€1.6m
2. Inflation adjustment: amount carried over to year n (Art. 25(2)(b))	€0.05m	€0.04m	€0.004m	-
3. Traffic risk sharing adjustment: amounts carried over to year n (Art. 25(2)(c))	€0.4m	€0.4m	-	-
4. Differences in costs as per Art. 28(4) to (6): amounts carried over to year n (Art. 25(2)(d))	-€1.5m	-€1.5m	-	-
5. Financial incentives: amounts carried over to year n (Art. 25(2)(e))	-	-	-	-
6. Modulation of charges: amounts carried over to year n (Art. 25(2)(f))	-	-	-	-
7. Traffic adjustments: amounts carried over to year n (Art. 25(2)(g) and (h))	€0.17m	€0.01m	€0.1m	€0.06m
8. Other revenues (Art. 25(2)(i))	-€0.8m	-€0.8m	-	-
9. Cross-financing between charging zones (Art. 25(2)(j))	-	-	-	-
10. Difference in revenue from temporary application of unit rate (Art. 25(2)(k))	€1m	€0.6m	€0.3m	€0.1m
11. Grand total for the calculation of year n unit rate	€37.9m	€33.5m	€2.7m	€1.7m
12. Forecast total service units for year n (performance plan)	226,065	226,065	226,065	226,065
13. Unit rate for year n as per Art. 25(2) (in national currency)	€167.72	€148.04	€12.02	€7.65

Source: Reported Terminal tables based on costs as per financial data from ANI, IAA, and Met Éireann.

4.7 As with En Route, the intended 2027 Terminal Unit Rate is not inclusive of the return of AirNav Ireland's unspent capex for 2025 which will be returned to users over the RP5 period. In its submission AirNav Ireland proposes a return of €1.23m in unspent capex relating to the year 2025 for Terminal.