

Structure and Purpose

The proposed template for Performance Plans was developed to facilitate the work of Member States and NSAs in their tasks to draw up and adopt performance plans and targets for RP4. It follows the structure provided for in Annex II of Commission Implementing Regulation (EU) No 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.

Furthermore, to reduce the administrative burden on Member States the template is already prefilled to the maximum extent possible.

In light of this, different field categories have been identified and colour-coded to facilitate the reporting:

Colour coding	
<i>Item 1</i>	<i>Information to be provided by Member States</i>
<i>Item 2</i>	<i>Pre-filled but editable information</i>
<i>Item 3</i>	<i>Pre-filled or automatically computed information</i>
<i>Item 4</i>	<i>Dynamic selection</i>

States can easily provide additional narrative material in the annexes which form an integral part of the performance plan.

The worksheets in the Excel file replicate the said structure and the tabs for main sections have been highlighted in black, while subsections are in light brown as shown below:

Subsection	MAIN SECTION 1 >>>	Subsection 1.1	Subsection 1.2	Subsection 1.3	MAIN SECTION 2 >>>	Subsection 2.1	Subsection 2.2
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Tips and tricks

- Since the Excel file is completely unprotected, be careful when filling the cells or adding lines/columns to avoid erasing the prefilled or pre-calculated areas.
- Manually adapt height of cell if necessary, in particular for text or description boxes.
- Within a cell, press ALT+ENTER to jump to the next line.

Additional comments	This performance plan has been reviewed by all signatories.
	It has been signed in the margins of our FAB coordination meeting held on 29 Feb. 2014.

- For existing text from another source, copy and paste into the formula bar will ensure that all text remains within a single cell.



- In order to **print** your performance plan, please refer to section "Signatories".

Performance Plan Ireland

Fourth Reference Period (2025-2029)

Status: Final performance plan (Art. 16(a and b) of IR
2019/317)

Date of issue: 18/08/2025

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Signatories

Performance plan details	
State name	Ireland
Status of the Performance Plan	Final performance plan (Art. 16(a and b) of IR 2019/317)
Date of issue	18/08/2025
Date of adoption of Draft Performance Plan	18/08/2025
Date of adoption of Final Performance Plan	16/06/2026

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

Ethna Brogan DGCA Department of Transport Leeson Lane D02 TR60	 <i>(electronically signed)</i>
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Additional comments	
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Document change record		
Version	Date	Reason for change
0.1	01/10/2024	Completion of draft Performance Plan
0.2	15/11/2024	Verification of Completeness
1.1	18/08/2025	Revision of draft Performance Plan
1.2	07/10/2025	Verification of Completeness
1.3	16/06/2026	Adoption of Final Performance Plan

SECTION 1: INTRODUCTION

1.1 The situation

- 1.1.1 - List of ANSPs and geographical coverage of services
- 1.1.2 - Other entities in the scope of the Performance and Charging Regulation as per Article 1(2) last para.
- 1.1.3 - Charging zones (see also 1.4-List of Airports)
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1 - INTRODUCTION

1.1 - The situation

NSA(s) responsible for drawing up the Performance Plan	Irish Aviation Authority
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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	ATSP/CNSP	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	METSP	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 another State's charging zone(s)	3
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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 charging zone(s) covered by the performance plan	1
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Cross-border service provision in the charging zone(s) covered by the performance plan		
ANSP 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 that the IAA has identified a 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 IAA's consultation documents published in January and July 2024, our decision document where we address the consultation responses 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. From June to August 2025, we have then undertaken a further consultation process in relation to the revision of the performance targets pursuant to article 14, and again we have uploaded all associated documentation, including our published draft and final decisions, and associated models.

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 received in response to our draft decisions, 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 2024 (Base)

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 2024 (Base)

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
Drawing up of draft Performance Plan (Article 10) 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 of October 2024, and in the final CEPA report. Revision of Performance Targets (Article 14) Our approach here was to lay out a number of possible revision scenarios, together with a new proposal for additional capacity targets and incentive schemes. Airlines supported Scenario 1.3, whereas AirNav Ireland and the AirNav Ireland Staff Panel supported Scenario 1.2. Airspace users asked us to consider further a scenario option which would align with the target cost trends without recourse to capacity measures, and one considered that there was insufficient evidence to support our draft conclusion that any deviation from the target cost trends was justifiable under Annex IV(1.4(d)). Airlines supported our proposed new incentive schemes, while AirNav Ireland expressed some concerns. All of these positions were taken into account, as set out specifically in our decision document of August 2025. We decided to go with Scenario 1.3, and to introduce the new incentive schemes.

1.3.2 - 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 centrelime forecast of efficient costs which is consistent with delivering a high-quality service in a safe manner. Revision of Performance Targets A number of adjustments were made as outlined under Scenario 1.3.
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 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 KPA's 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. Revision of Performance Targets Following the consultation process, we accepted submissions from airlines in respect of further increasing the reduction to c30% (in line with Scenario 1.3).
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 costs 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 zero. 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. Following the verification of completeness request, the IAA has included a small non-zero deadband.
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 any 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. <u>Revision of Performance Targets</u> There was general agreement across airspace users (except IATA), AirNav Ireland, and the staff panel, that the ex ante traffic forecasts should not be changed as part of the revision process and that we should retain the STATFOR base forecast from February 2024, for the draft reasons we set out in our Draft Decision of July 2025.

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 2024. Responses to the Draft Decision were received from both ANSPs on 23rd August, which have been published alongside the IAA's Final Decision. <u>Revision of Performance Targets</u> The meeting was held on 29th July 2025, and AirNav Ireland subsequently provided a response to the Draft Decision.
Main issues discussed	All of the elements of the proposed Performance Plan were discussed. The main issues the ANSPs raised during the consultation process related to the 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. <u>Revision of Performance Targets</u> AirNav Ireland outlined the basis of its support for Scenario 1.2, and provided various specific submissions in respect of our new incentive scheme proposal.
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. <u>Revision of Performance Targets</u> AirNav Ireland submitted that the proposed new incentive schemes could generate excessive rebates and perverse incentives.
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. <u>Revision of Performance Targets</u> We continued to adopt the new incentive schemes, but amended the calculation methodology somewhat.

Additional comments

#2 - Airspace Users	
Stakeholder group composition	Aer Lingus, BA, IAG, IATA, Qatar Airways, Ryanair, Swiss Air
Dates of main meetings / correspondence	The main consultation meeting was held on 2 August. Responses to the Draft Decision were received from Aer Lingus, IAG, and Ryanair on 23rd August 2024, which have been published alongside the IAA's Final Decision (Ryanair did not provide a publishable version). <u>Revision of Performance Targets</u> The meeting was held on 29th July 2025, and Aer Lingus, British Airways, IAG, Ryanair, and IATA provided responses to the Draft Decision on revised targets.
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. <u>Revision of Performance Targets</u> Airlines supported scenario 1.3, and the proposed new incentive schemes. Airlines suggested that we should also consider broader changes to the draft Performance Plan such that it would align with the DUC target trends without recourse to capacity measures, and IATA asserted that there was insufficient evidence to support our draft conclusions in respect of the capacity measures.
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. <u>Revision of Performance Targets</u> In some cases, the extent to which the deviation from the target cost trend is justified by capacity measures. We have set out our reasons in that regard in the Final Decision on the revision.
	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.

Final outcome of the consultation	<u>Revision of Performance Targets</u> The preferred scenario of 1.3 has been adopted, and so have the additional incentive schemes.
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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 2024. A response to the Draft Decision was received from the Staff Panel on 23rd August, which has been published alongside the IAA's Final Decision. <u>Revision of Performance Targets</u> The Staff Panel attended the meeting of 29th July 2025 and provided a submission in response to the Draft Decision.
Main issues discussed	All of the elements of the proposed Performance Plan were discussed. The main issues the staff representatives raised during the consultation process 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 respects. They also considered that the capacity targets proposed were too stretching, and that we should instead use the national reference values. <u>Revision of Performance Targets</u> The Staff Panel reiterated the implications of currently insufficient staffing levels, including overtime, and considered that we had calculated some of the capacity measures in an overly conservative way. It set out its support for scenario 1.2, and made some suggestions regarding the new incentive schemes.
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 operating cost forecasts, and the proposed capacity targets, as outlined above. <u>Revision of Performance Targets</u> The approach to estimating the capacity measures.
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. The IAA did not change the proposed capacity targets. <u>Revision of Performance Targets</u> We did not change the approach to estimating the capacity measures, as set out in our Final Decision on the revision.

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 meetings of 2 August 2024, and 29th July 2025, 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
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 $\geq 80\,000$)

ICAO code	Airport name	Charging Zone	IFR air transport movements			
			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

Number of services under market conditions	0
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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
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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 asset (capex or contractual leasing value) (in national currency)	Value of the assets allocated to ANS in the scope of the performance plan (in national currency)	Elements for the calculation of the determined costs of investments (net book value (NBV), depreciation and cost of leasing) (in national currency)					
				2025	2026	2027	2028	2029
New major investments for RP4 (Table A)	118,100,000	85,871,000	Average NBV	0	5,979,005	24,309,115	31,103,718	58,920,903
			Depreciation	0	520,948	2,214,313	2,766,049	5,403,588
			Cost of leasing	0	0	0	0	0
Other new investments for RP4 (below 5M€) (Table B)	93,253,000	65,141,621	Average NBV	1,133,388	5,366,653	11,041,087	16,551,143	25,394,112
			Depreciation	755,534	2,391,995	3,818,402	4,831,946	5,782,679
			Cost of leasing	0	0	0	0	0
Major investments from RP3 (Tables C + D)	110,781,000	101,047,200	Average NBV	57,692,035	57,184,364	55,653,437	51,688,254	46,954,842
			Depreciation	4,365,785	4,742,698	5,054,524	5,119,994	4,641,661
			Cost of leasing	0	0	0	0	0
Existing investments from previous reference periods (Table E)	7,844,000	6,275,000	Average NBV	57,900,906	55,051,711	49,558,504	42,934,984	36,447,350
			Depreciation	7,095,472	6,038,318	4,793,130	3,654,235	2,572,635
			Cost of leasing	0	0	0	0	0
Total for the ANSP in RP4	329,978,000	258,334,821	Average NBV	116,726,329	123,581,734	140,562,144	142,278,099	167,717,208
			Depreciation	12,216,791	13,693,959	15,880,368	16,372,224	18,400,563
			Cost of leasing	0	0	0	0	0

Met Éireann Aviation Services Division (ASD)

	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 performance plan (in national currency)	Elements for the calculation of the determined costs of investments (net book value (NBV), depreciation and cost of leasing) (in national currency)					
				2025	2026	2027	2028	2029
New major investments for RP4 (Table A)	0	0	Average NBV	0	0	0	0	0
			Depreciation	0	0	0	0	0

			Cost of leasing	0	0	0	0	0
Other new investments for RP4 (below 5M€) (Table B)	34,722,463	6,909,908	Average NBV	1,126,606	1,453,717	3,442,795	3,582,637	5,056,644
			Depreciation	141,639	204,139	520,924	547,894	877,338
			Cost of leasing	0	0	0	0	0
Major investments from RP3 (Tables C + D)	0	0	Average NBV	0	0	0	0	0
			Depreciation	0	0	0	0	0
			Cost of leasing	0	0	0	0	0
Existing investments from previous reference periods (Table E)	13,642,404	2,373,778	Average NBV	944,806	470,051	116,336	0	0
			Depreciation	474,756	474,756	232,673	0	0
			Cost of leasing	0	0	0	0	0
Total for the ANSP in RP4	48,364,867	9,283,686	Average NBV	2,071,412	1,923,767	3,559,132	3,582,637	5,056,644
			Depreciation	616,395	678,895	753,596	547,894	877,338
			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

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

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Ref. #	Name of new major investments (i.e. above 5 M€) for 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 performance plan (in national currency)	Elements for the calculation of the determined costs of investments (net book value (NBV), depreciation and cost of leasing) (in national currency)						Lifecycle (Amortisation period in years)	Planned date of entry into operation	Allocation (%)*	
					2025	2026	2027	2028	2029			En route*	Terminal*
A1	COOPANS TopSky ATC One	54,900,000	41,631,000	Average NBV	0	2,532,125	9,589,750	8,727,750	30,353,281	12 years	2029	75%	25%
				Depreciation	0	215,500	862,000	862,000	2,817,438				
				Cost of leasing									
A2	Radar Upgrade Phase 2	22,000,000	15,400,000	Average NBV	0	1,821,094	8,583,355	11,708,624	12,567,795	12 years	2026	75%	25%
				Depreciation	0	158,594	764,896	1,106,632	1,283,333				
				Cost of leasing									
A3	Ballycasey Building Extension	12,200,000	8,540,000	Average NBV	0	0	0	0	2,113,650	25 years	2029	100%	0%
				Depreciation	0	0	0	0	85,400				
				Cost of leasing									
A4	ASMGCS	12,000,000	8,400,000	Average NBV	0	0	0	0	4,016,250	10 years	2029	0%	100%
				Depreciation	0	0	0	0	420,000				
				Cost of leasing									
A5	CASDS	9,500,000	6,650,000	Average NBV	0	1,625,786	6,136,010	5,548,594	4,961,177	8 years for simulators, 12 years for	2026	75%	25%
				Depreciation	0	146,854	587,417	587,417	587,417				
				Cost of leasing									
A6	Dublin ATC Building Extension	7,500,000	5,250,000	Average NBV	0	0	0	5,118,750	4,908,750	25 years	2028	75%	25%
				Depreciation	0	0	0	210,000	210,000				
				Cost of leasing									
Subtotal of new major investments from RP4		118,100,000	85,871,000	Average NBV	0	5,979,005	24,309,115	31,103,718	58,920,903				
				Depreciation	0	520,948	2,214,313	2,766,049	5,403,588				
				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

	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 performance plan (in national currency)	Elements for the calculation of the determined costs of investments (net book value (NBV), depreciation and cost of leasing) (in national currency)						Lifecycle (Amortisation period in years)	Planned date of entry into operation	Allocation (%)*	
				2025	2026	2027	2028	2029			En route*	Terminal*
Subtotal of other new investments from			Average NBV	1,133,388	5,366,653	11,041,087	16,551,143	25,394,112				

RP4	93,253,000	65,141,621	Depreciation	755,534	2,391,995	3,818,402	4,831,946	5,782,679			70%	30%
			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

Table C - Number of major investments (i.e. above 5 M€) from RP3 performance plan	10
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Ref. #	Name of major investments (i.e. above 5 M€) stemming from RP3 performance plan	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 performance plan (in national currency)	Elements for the calculation of the determined costs of investments (net book value (NBV), depreciation and cost of leasing) (in national currency)						Lifecycle (Amortisation period in years)	Planned date of entry into operation	Allocation (%)*	
					2025	2026	2027	2028	2029			En route*	Terminal*
C1	COOPANS Builds 3.6 to 3.8 budget	8,000,000	6,400,000	Average NBV	4,751,311	3,863,497	2,975,684	2,087,870	1,200,056	8 years	2021-2023	75%	25%
				Depreciation	887,814	887,814	887,814	887,814	887,814				
				Cost of leasing									
C2	New Dublin Radar 2 Replacement	5,000,000	4,000,000	Average NBV	2,645,193	2,457,528	2,269,863	2,082,198	1,894,533	15 years	2022	75%	25%
				Depreciation	165,371	165,371	165,371	165,371	165,371				
				Cost of leasing									
C3	NAVAIDS replacement program	9,000,000	7,200,000	Average NBV	2,833,384	4,200,424	5,394,745	4,852,660	4,310,575	12 years	2021-2024	0%	100%
				Depreciation	257,991	400,338	542,085	542,085	542,085				
				Cost of leasing									
C4	Dublin Tower - Building	36,391,000	36,391,000	Average NBV	33,100,240	32,189,225	31,278,209	30,367,193	29,456,177	40 years	2021	0%	100%
				Depreciation	911,016	911,016	911,016	911,016	911,016				
				Cost of leasing									
C5	Dublin Tower - Equipment	13,466,000	13,466,000	Average NBV	6,938,989	6,005,558	4,705,720	3,405,882	2,163,888	12 years	2021	0%	100%
				Depreciation	1,267,025	1,299,838	1,299,838	1,299,838	1,184,150				
				Cost of leasing									
C6	COOPANS 2019 Roadmap Builds	8,000,000	6,400,000	Average NBV	1,963,200	3,214,186	3,980,407	4,048,676	3,291,039	8 years	2023-2024	75%	25%
				Depreciation	276,431	478,184	648,263	746,700	746,700				
				Cost of leasing									
C7	New En Route Contingency Centre at Ballygireen	12,255,000	12,255,000	Average NBV	4,274,028	4,153,350	4,032,671	3,911,993	3,791,315	Building 40 years & ATM systems 12	2020	100%	0%
				Depreciation	516,290	516,290	516,290	483,323	120,678				
				Cost of leasing									
C8	Plant upgrade works	7,169,000	5,735,200	Average NBV	749,460	696,881	644,938	593,094	541,086	8 years	2023	71%	29%
				Depreciation	51,333	51,333	51,333	51,333	51,333				
				Cost of leasing									
C9	Emergency Air Situation Display System (EASDS) Replacement	6,500,000	5,200,000	Average NBV		0	0	0	0	20 years	2021-2024	75%	25%
				Depreciation	0	0	0	0	0				
				Cost of leasing									
C10	Climate Action Plan (Sustainability Management Plan)	5,000,000	4,000,000	Average NBV	436,230	403,716	371,202	338,688	306,174	15 years	2021-2024	75%	25%
				Depreciation	32,514	32,514	32,514	32,514	32,514				
				Cost of leasing									
Subtotal of major investments from RP3 performance plan		110,781,000	101,047,200	Average NBV	57,692,035	57,184,364	55,653,437	51,688,254	46,954,842				
				Depreciation	4,365,785	4,742,698	5,054,524	5,119,994	4,641,661				
				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 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

Table E - Existing investments from previous RPs

	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 performance plan (in national currency)	Elements for the calculation of the determined costs of investments (net book value (NBV), depreciation and cost of leasing) (in national currency)					Lifecycle (Amortisation period in years)	Planned date of entry into operation	Allocation (%)*	
				2025	2026	2027	2028	2029		En route*	Terminal*
Subtotal of existing investments from previous RPs	7,844,000	6,275,000	Average NBV	57,900,906	55,051,711	49,558,504	42,934,984	36,447,350			
			Depreciation	7,095,472	6,038,318	4,793,130	3,654,235	2,572,635			73%
			Cost of leasing								27%

* 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 the asset		54,900,000	
Main category of the investment	New ATM system	Overhaul of existing ATM system		Other ATM		CNS	Infrastructure	Ancilliary	Other
		X							
Description of the asset		The COOPANS TopSky ATC One platform will replace the existing COOPANS ATM platform and associated software and hardware. This major system upgrade is required to meet capacity targets, adress obsolescence, and to ensure COOPANS members transition towards the Digital European Sky.							
Is the investment mandated by a SES Regulation (i.e. PCP/CP1/Interoperability)?	Yes	Yes, this investment is partially required for CP1 compliance and in particular in relation to AF5 and AF6.							
If yes please provide description/reference									

For investments in new ATM systems and major overhauls of ATM systems, information on the consistency of the investment with the European ATM Master Plan		The modernization effort is intended to bring AirNav Ireland, working with its COOPANS partners, in line with the European ATM 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. The environment KPI focuses on the efficiency of trajectories by comparing flown distances with great circle routes. Optimising trajectories requires strategic trajectory de-confliction and coordination, and this is one key goal of the ATM Master Plan vision. The updated system will deliver this ATM roadmap capability and hence will enable future environmental KPIs to be met. The TopSky-ATC One is an open, interoperable solution. With efforts made in the EXODUS project to show how it can be virtualised, it presents several ways in which COOPANS can generate new revenue streams, while improving efficiency and safety in air traffic management. COOPANS' relationship with Thales enables a shared approach to innovation, aligning industry collaboration with the new model. The shift away from proprietary middleware aligns with industry best practices, enhancing collaboration and integration capabilities with existing and new partners who may look to enter the industry as a result of the liberalisation. COOPANS Innovation Platform is a unique solution which will allow COOPANS to test upgraded systems and tools in a modern (virtualised) environment, allowing it to be at the forefront of the European Development Space. This includes sharing data between 6 COOPANS members in a cloud environment and showing states that this can be done securely.			
Level of impact of the investment	Network level	Yes			
	Local level	Yes			
Quantitative impact per KPA		Safety	Environment	Capacity	Cost Efficiency
		Significant	Significant	Major	Major
Benefits for airspace users and results of the consultation of airspace users' representatives		Stakeholders supported this proposal. 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	If yes, please provide reference to joint project and/or indicate reference to cross-border initiatives		This is a joint COOPANS Alliance project.	

Name of new major investment 2	Radar Upgrade Phase 2	Reference #	A2	Total value of the asset		22,000,000	
Main category of the investment	New ATM system	Overhaul of existing ATM system	Other ATM	CNS	Infrastructure	Ancillary	Other
				X	X		
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 be addressed.					
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 overhauls of ATM systems, information on the consistency of the investment with the European ATM Master Plan							
Level of impact of the investment	Network level	Yes					
	Local level	Yes					
Quantitative impact per KPA		Safety	Environment	Capacity	Cost Efficiency		
		Major	Significant	Significant	Significant		

Results of the consultation of airspace users' representatives		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

Name of new major investment 3	Ballycasey Building Extension			Reference #	A3	Total value of the asset		12,200,000	
Main category of the investment		New ATM system	Overhaul of existing ATM system		Other ATM	CNS	Infrastructure	Ancillary	Other
							X		
Description of the asset		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 overhauls of ATM systems, information on the consistency of the investment with the European ATM Master Plan									
Level of impact of the investment	Network level	Yes							
	Local level	Yes							
Quantitative impact per KPA		Safety		Environment		Capacity		Cost Efficiency	
		Negligible		Negligible		Significant		Significant	
Results of the consultation of airspace users' representatives		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							

Name of new major investment 4	ASMGCS			Reference #	A4	Total value of the asset		12,000,000	
Main category of the investment		New ATM system	Overhaul of existing ATM system		Other ATM	CNS	Infrastructure	Ancilliary	Other
		X					X		
Description of the asset		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. PCP/CP1/Interoperability)? If yes please provide description/reference		No	This investment is recommended as best practice by EUROCONTROL/EASA.						
For investments in new ATM systems and major overhauls of ATM systems, information on the consistency of the investment with the European ATM Master Plan		This project aligns with one of the Strategic Objectives in the updated Master Plan SDO#1: Alert for reduction of collision risks on taxiways and runways.							
Level of impact of the investment		Network level	No						
		Local level	Yes						

Quantitative impact per KPA		Safety	Environment	Capacity	Cost Efficiency
		Major	Negligeable	Significant	Negligeable
Results of the consultation of airspace users' representatives		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 aerodrome operators, who will need to invest separately in the airfield infrastructure and to ensure compatible vehicles.	

Name of new major investment 5	CASDS			Reference #	A5	Total value of the asset		9,500,000	
Main category of the investment		New ATM system	Overhaul of existing ATM system		Other ATM	CNS	Infrastructure	Ancilliary	Other
		X	X						
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	Although a contingency system, the new system will be CP1 compliant whereas the current system is not.						
For investments in new ATM systems and major overhauls of ATM systems, information on the consistency of the investment with the European ATM Master Plan		Failing to invest in a new contingency system would lead to a reversion to a manual fallback system in the case of a failure of the main COOPANS system, which would cause significant flow control issues in Irish controlled airspace and not be consistent with the SDOs set out in the ATM Master plan.							
Level of impact of the investment		Network level	Yes						
		Local level	Yes						
Quantitative impact per KPA		Safety	Environment		Capacity		Cost Efficiency		
		Significant	Negligeable		Significant		Significant		
Results of the consultation of airspace users' representatives		This project was outlined in the consultation material, but was not the subject of any substantive submissions from airspace users' representatives. AirNav Ireland referred to the several hour long ATM system outage experienced by NATS in 2023, and that IATA had estimated the cost to the industry in the region of €100m. AirNav Ireland said that this investment will go a long way to avoid such events, and therefore represents 'considerable value for money'.							
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 Building Extension		Reference #	A6	Total value of the asset		7,500,000
Main category of the investment		New ATM system	Overhaul of existing ATM system	Other ATM	CNS	Infrastructure	Ancillary	Other
						X		
Description of the asset		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)? If yes please provide description/reference	No				
For investments in new ATM systems and major overhauls of ATM systems, information on the consistency of the investment with the European ATM Master Plan					
Level of impact of the investment	Network level	No			
	Local level	Yes			
Quantitative impact per KPA		Safety	Environment	Capacity	Cost Efficiency
		Negligeable	N/A	Significant	Negligeable
Results of the consultation of airspace users' representatives		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.					

Ref. #	Name of other new investments for RP4	Master Plan reference (if any)	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 performance plan (in national currency)	Elements for the calculation of the determined costs of investments (net book value (NBV), depreciation and cost of leasing) (in national currency)						Description
						2025	2026	2027	2028	2029	
B1					Average NBV						
					Depreciation						
					Cost of leasing						
B2					Average NBV						
					Depreciation						
					Cost of leasing						
B3					Average NBV						
					Depreciation						
					Cost of leasing						
B4					Average NBV						
					Depreciation						
					Cost of leasing						
B5					Average NBV						
					Depreciation						
					Cost of leasing						
B6					Average NBV						
					Depreciation						

					Cost of leasing						
B7					Average NBV						
					Depreciation						
					Cost of leasing						
B8					Average NBV						
					Depreciation						
					Cost of leasing						
B9					Average NBV						
					Depreciation						
					Cost of leasing						
B10					Average NBV						
					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
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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 performance plan (in national currency)	Elements for the calculation of the determined costs of investments (net book value (NBV), depreciation and cost of leasing) (in national currency)					Lifecycle (Amortisation period in years)	Planned date of entry into operation	Allocation (%)*		
				2025	2026	2027	2028			2029	En route*	Terminal*
Subtotal of other new investments from RP4	34,722,463	6,909,908	Average NBV	1,126,606	1,453,717	3,442,795	3,582,637	5,056,644			80%	20%
			Depreciation	141,639	204,139	520,924	547,894	877,338				
			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
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Table D - Number of major investments (i.e. above 5 M€) added during RP3	0
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2.2.3 - Existing investments from previous reference periods (000's)

Table E - Existing investments from previous RPs

	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 performance plan (in national currency)	Elements for the calculation of the determined costs of investments (net book value (NBV), depreciation and cost of leasing) (in national currency)					Lifecycle (Amortisation period in years)	Planned date of entry into operation	Allocation (%)*		
				2025	2026	2027	2028			2029	En route*	Terminal*
Subtotal of existing investments from previous RPs	13,642,404	2,373,778	Average NBV	944,806	470,051	116,336	0	0			80%	20%
			Depreciation	474,756	474,756	232,673	0	0				
			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

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.					

Ref. #	Name of other new investments for RP4	Master Plan reference (if any)	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 performance plan (in national currency)	Elements for the calculation of the determined costs of investments (net book value (NBV), depreciation and cost of leasing) (in national currency)						Description
						2025	2026	2027	2028	2029	
B1	Met Self Briefing Upgrade		150,000	150,000	Average NBV	135,000	105,000	75,000	45,000	15,000	This project, originally part of the METCOM project, will allow aviation users of Met Éireann's meteorological services to more readily access bespoke regulated data in a user-friendly configurable environment.
					Depreciation	30,000	30,000	30,000	30,000	30,000	
					Cost of leasing	0	0	0	0	0	
B2	RADAR Upgrades		15,133,144	2,633,167	Average NBV	318,556	305,554	1,232,969	1,842,347	2,424,756	The Met Éireann RADAR network will be upgraded from its current 2 sites to 6 sites which will significantly increase the 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.
					Depreciation	13,002	13,002	51,387	78,357	105,327	
					Cost of leasing	0	0	0	0	0	
B3	METCOM		1,447,519	458,368	Average NBV	435,450	389,613	343,776	297,939	252,103	The METCOM project will upgrade aviation messaging systems to ensure regulatory compliance and enable compliance with CP1.
					Depreciation	45,837	45,837	45,837	45,837	45,837	
					Cost of leasing	0	0	0	0	0	
B4	AUTO OBS		500,000	500,000	Average NBV	0	468,750	406,250	343,750	281,250	Investment in additional visibility observing sites in the vicinity of the major airports will provide the aviation observers and forecast teams of early warning of degenerating visibility and cloud ceiling conditions through the deployment of visual aid sensors.
					Depreciation	0	62,500	62,500	62,500	62,500	
					Cost of leasing	0	0	0	0	0	
B5	IMaMS 2		8,000,000	1,392,000	Average NBV	0	0	1,252,800	974,400	696,000	This is a continuation of the IMaMs project and provides consisten Business Continuity for Met ASD. This phase will take over from IMaMS and ensure no gap in cover.
					Depreciation	0	0	278,400	278,400	278,400	
					Cost of leasing	0	0	0	0	0	
					Average NBV	0	0	0	0	1,361,136	This is a new project for RP4 and consists of a continuation of the HPC1. HPC capacity is being developed in
					Depreciation	0	0	0	0	302,475	

B6	HPC 2		8,691,800	1,512,373	Cost of leasing	0	0	0	0	0	collaboration with other modern European Meteorological Services to ensure value for money and to optimise the investment potential.
B7	MET Data Visualisation Project		800,000	264,000	Average NBV	237,600	184,800	132,000	79,200	26,400	The purpose of this project is to procure and enter into a new contract for a Meteorological Data Visualisation and 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.
					Depreciation	52,800	52,800	52,800	52,800	52,800	
					Cost of leasing	0	0	0	0	0	
B8					Average NBV						
					Depreciation						
					Cost of leasing						
B9					Average NBV						
					Depreciation						
					Cost of leasing						
B10					Average NBV						
					Depreciation						
					Cost of leasing						

SECTION 3: PERFORMANCE TARGETS AND MEASURES FOR THEIR ACHIEVEMENT

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

METSP #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				
AirNav Ireland		2025 Target	2026 Target	2027 Target	2028 Target	2029 Target
	Safety policy and objectives	C	C	C	C	C
	Safety risk management	D	D	D	D	D
	Safety assurance	C	C	C	C	C
	Safety promotion	C	C	C	C	C
	Safety culture	C	C	C	C	C
	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 of 2024.

** Refer to Annex O, if necessary.*

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 risk-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.

AirNav Ireland has developed a EoSM Project Plan which is led by the Safety Manager and sponsored by the Accountable Manager with a goal to achieve Level D in Safety Risk Management. Included in scope is improving Hazard Identification recording by deploying innovative business solutions (Jama), purchasing software for retention of training records for Change Management, purchasing ViewPoint software for data analysis of fatigue levels in ATCO's, financing purchasing of Elvira for safety analytics, recruitment of a Training Co-ordinator and additional safety analyst in line with RP4 deployment of Operational Excellence consultant to review change management processes and seek improvements, creating an ATM Occurrence Investigation cell within the Safety Management Unit and collaborating with other industries to improve safety within ANSP. These deliverables are intended to drive safety improvement changes throughout the organisation, aimed at not only achieving Level D in SRM but in all components.

** 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 remaining 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 that 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 of 2024.

** Refer to Annex P, if necessary.*

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.*

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 ATFM delay 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, close to the target. 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/disproportionate 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 of 2024, as well as our Draft Decision document from 2025 on the target revision, where we outlined the requested further detail in respect of the above.

** Refer to Annex Q, if necessary.*

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 IAA 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 IAA 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 IAA 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.

Revision of Performance Targets

As set out in the relevant tab, we have also now added further capacity targets based on operational staffing level KPIs, together with financial incentive schemes and the additional capacity measures, which are expressly necessary and proportionate to achieve these capacity KPI targets.

** Refer to Annex Q, if necessary.*

3.3.2 - Capacity KPI #2: Terminal and airport ANS ATFM arrival delay per flight

a) National capacity performance targets

	2025	2026	2027	2028	2029
	Target	Target	Target	Target	Target
National targets	0.2	0.2	0.2	0.2	0.2
Additional comments	The National targets remain unchanged from RP3. However, the parameters for the Terminal capacity incentive scheme are adjusted to make it more effectively targeted towards CRSTMP delay, while modulating downwards the pivot values. This is discussed in the relevant section.				

Airport level	EIDW-Dublin	0.25	0.25	0.25	0.25	0.25
	Airport contribution to national targets					
	EICK-Cork	0.00	0.00	0.00	0.00	0.00
	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/disproportionate 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 of 2024.

* Refer to Annex Q, if necessary.

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 IAA 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 IAA 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 IAA 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.

3.3.3 - ATCO planning and training

AirNav Ireland

a) ATCOs in the scope of the performance plan

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

b) ATCO planning at ACC level

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

Shannon (EISN ACC)	Actual	Forecast	Planned				
	2023	2024	2025	2026	2027	2028	2029
Number of additional ATCOs in OPS planned to start working in the OPS room (FTEs)	0	16	17	20	12	18	10
Number of ATCOs in OPS planned to stop working in the OPS room (FTEs)	0	14	13	9	8	9	8
Number of ATCOs in OPS planned to be operational at year-end (FTEs)	194	195	200	211	214	223	225

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		Actual	Forecast	Planned				
		2023	2024	2025	2026	2027	2028	2029
Number of trainees planned to enter the training 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 estimates.		N/A	20	20	24	15	23	13
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.

The training process for ATCOs is partially outsourced to Entry Point North. In relation to licenced training such as unit endorsement training or continuation training, AirNav Ireland is contracted by EPN to provide this training service (unit endorsement training has to be completed by an ATCO rated in that unit). On the job training is provided by AirNav Ireland. Other aspects of the training process (e.g., initial assessments) are carried out by AirNav Ireland without any involvement of EPN.

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

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 Name of the CZ	Baseline 2019	Baseline 2024	RP4 cost-efficiency targets (determined 2025-2029)					2029D vs. 2019B (CAGR)	2029D vs. 2024B (CAGR)
	2019 B	2024 B	2025 D	2026 D	2027 D	2028 D	2029 D		
Total en route costs in nominal terms (in national currency)	117,289,931	141,314,770	157,639,746	167,998,739	172,962,150	179,632,704	187,004,393	5.3%	5.8%
Total en route costs in real terms (in national currency at 2022 prices)	127,202,242	134,120,542	147,451,771	155,124,825	157,746,575	161,352,714	165,464,966	3.0%	4.3%
Total en route costs in real terms (in EUR2022) ¹	127,202,242	134,120,542	147,451,771	155,124,825	157,746,575	161,352,714	165,464,966	3.0%	4.3%
YoY variation				5.2%	1.7%	2.3%	2.5%		
Total en route Service Units (TSU)	4,606,517	4,988,412	5,175,000	5,256,000	5,349,000	5,458,000	5,544,000	2.1%	2.1%
YoY variation				1.6%	1.8%	2.0%	1.6%		
Real en route unit costs (in national currency at 2022 prices)	27.61	26.89	28.49	29.51	29.49	29.56	29.85	0.9%	2.1%
Real en route unit costs (in EUR2022) ¹	27.61	26.89	28.49	29.51	29.49	29.56	29.85	0.9%	2.1%
YoY variation				3.6%	-0.1%	0.2%	1.0%		

National currency	EUR
¹ Average exchange rate 2022 (1 EUR=)	1.00
Actual inflation index 2024 - Base 100 in 2022	106.59

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

En route charging zone Name of the CZ	Baseline 2019	Baseline 2024	Actuals 2019	Actuals 2024	2019 Baseline adjustments	2024 Baseline adjustments
	2019 B	2024 B	2019 A	2024 A		
Total en route costs in nominal terms (in national currency)	117,289,931	141,314,770	114,371,000	140,129,819	2,918,931	1,184,951
Total en route costs in real terms (in national currency at 2022 prices)	127,202,242	134,120,542	123,971,149	132,974,192	3,231,093	1,146,351
Total en route costs in real terms (in EUR2022) ¹	127,202,242	134,120,542	123,971,149	132,974,192	3,231,093	1,146,351
Total en route Service Units (TSU)	4,606,517	4,988,412	4,640,860	4,988,412	-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

Number of adjustments	4
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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
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						

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 necessary 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.

Adjustment #4	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
Space Weather Costs	Met Éireann ASD	MET	Other operating	113,690	125,849	125,849

Description and justification of the adjustment

As provided for under the Joint Declaration by the States in the Single Sky Committee on the Inclusion of Charges for Space Weather Information Services in their RP4 Performance Plans, a part of the costs of the ICAO Space Weather services provided by the European Union Member States in the Single European Sky airspace has been included in each year 2025 - 2029. This adjustment is in line with the costs provided in the Joint Declaration and was not incurred prior to RP4.

Total adjustments to the 2019 baseline value for the determined costs	Costs nominal NC	Costs real NC	Costs EUR2022
	2,918,931	3,231,093	3,231,093

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
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Total adjustments to the 2019 service units	-34,342
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c.3) Adjustments to the 2024 baseline value for the determined costs

Number of adjustments	3
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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	489,952	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 necessary 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.

Adjustment #2	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
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Space Weather Costs	Met Éireann ASD	MET	Other operating	134,146	125,849	125,849
Description and justification of the adjustment						
As provided for under the Joint Declaration by the States in the Single Sky Committee on the Inclusion of Charges for Space Weather Information Services in their RP4 Performance Plans, a part of the costs of the ICAO Space Weather services provided by the European Union Member States in the Single European Sky airspace has been included in each year 2025 - 2029. This adjustment is in line with the costs provided in the Joint Declaration and was not incurred prior to RP4.						

Adjustment #3	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
ECTRL CEF Refund	NSA	ISA/EUROCONTRO	Other operating	560,854	560,854	560,854
Description and justification of the adjustment						
When updating the 2024 costs to actual costs, a baseline adjustment of c.€560k is also included for 2024 to account for a once-off EUROCONTROL CEF refund which EUROCONTROL deducted from its actual costs in 2024, which has artificially reduced the EUROCONTROL actual costs in 2024 relative to those in previous years and as provided for RP4 (for example, actual cost of €8m increases back to €9.6m in 2025).						

Total adjustments to the 2024 baseline value for the determined costs	Costs nominal NC	Costs real NC	Costs EUR2022
	1,184,951	1,146,351	1,146,351

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 IAA has reviewed the drivers of this trend, and assesses it to be necessary and proportionate in reflecting the costs of measures necessary to achieve the capacity targets for RP4. It is driven by increased ATCO recruitment, and major investment in the ATM systems, and associated measures. Based on the Business Plan submissions of 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. As set out in the relevant tabs, as part of the target revision process, we have now also included additional capacity targets where the KPIs are ATCO and Engineer staffing levels. The Opex-related capacity measures are aligned with these targets and are, therefore, additionally, expressly necessary and proportionate to achieve the staffing-level capacity targets, and so engage Annex IV(1.4(d)(i)) on that basis as well.

** Refer to Annex R, if necessary.*

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 IAA 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.

** Refer to Annex R, if necessary.*

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
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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 Name of the CZ	Baseline 2024	RP4 cost-efficiency targets (determined 2025-2029)					2029D vs. 2024B (CAGR)
	2024 B	2025 D	2026 D	2027 D	2028 D	2029 D	
Total terminal costs in nominal terms (in national currency)	31,992,760	35,132,791	37,138,629	38,612,864	40,079,816	42,195,408	5.7%
Total terminal costs in real terms (in national currency at 2022 prices)	30,568,753	33,184,137	34,677,281	35,722,352	36,625,218	38,123,537	4.5%
Total terminal costs in real terms (in EUR2022) ¹	30,568,753	33,184,137	34,677,281	35,722,352	36,625,218	38,123,537	4.5%
YoY variation			4.5%	3.0%	2.5%	4.1%	
Total terminal Service Units (TNSU)	194,440	214,819	221,034	226,065	232,531	237,363	4.1%
YoY variation			2.9%	2.3%	2.9%	2.1%	
Real terminal unit costs (in national currency at 2022 prices)	157.21	154.47	156.89	158.02	157.51	160.61	0.4%
Real terminal unit costs (in EUR2022) ¹	157.21	154.47	156.89	158.02	157.51	160.61	0.4%
YoY variation			1.6%	0.7%	-0.3%	2.0%	

National currency	EUR
1 Average exchange rate 2022 (1 EUR=)	1.00
Actual inflation index 2024 - Base 100 in 2022	106.59

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

Terminal charging zone Name of the CZ	Baseline 2024	Actuals 2024	2024 Baseline adjustments
	2024 B	2024 A	
Total terminal costs in nominal terms (in national currency)	31,992,760	31,838,038	154,722
Total terminal costs in real terms (in national currency at 2022 prices)	30,568,753	30,423,601	145,152
Total terminal costs in real terms (in EUR2022) ¹	30,568,753	30,423,601	145,152
Total terminal Service Units (TNSU)	194,440	194,440	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	154,722	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 necessary 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.						

Total adjustments to the 2024 baseline value for the determined costs	Costs nominal NC	Costs real NC	Costs EUR2022
	154,722	145,152	145,152

c.2) Adjustments to the 2024 service units

Adjustment to the 2024 service units	No
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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 the short term trend from 2024 to 2029 is significantly improved on the previous draft Performance Plan, now significantly better than the En Route short term trend, at +0.4% rather than +1.9%. This is primarily as a result of actual 2024 traffic being lower than the STATFOR forecast, meaning that the 2024 DUC baseline is higher. The trend is also better than the actual RP3 unit cost trend. 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 the trend which is nonetheless increasing in real terms 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 necessary 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.

** Refer to Annex R, if necessary.*

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.
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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 Terminal ANS.

** Refer to Annex R, if necessary.*

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
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3.4.3 - Cost allocation ATSP/CNSP - AirNav Ireland

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 451,000km ² 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 ATCOs. 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)	2025	2026	2027	2028	2029
Determined costs for en route charging zone(s) in the scope of the performance plan	131,102	140,710	145,244	151,836	158,855
Determined costs for terminal charging zone(s) in the scope of the performance plan	31,420	33,320	34,720	36,161	38,207
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 as Shannon ACC (Ballycasey), Dublin control centre, Cork Airport, Shannon Airport, North Atlantic Communications (Ballygreen), 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, 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
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Services to OAT	No
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Other ANS	Yes
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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 central costs (such as corporate services), are excluded from this draft Performance Plan and allocated to the NAC charging zone.

Non ANS	No
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e) Changes in cost allocation methodology

Are there changes in the cost allocation criteria with respect to the previous reference period?	No
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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
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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)	2025	2026	2027	2028	2029
Determined costs for en route charging zone(s) in the scope of the performance plan	9,005	9,282	9,450	9,415	9,544
Determined costs for terminal charging zone(s) in the scope of the performance plan	2,216	2,285	2,327	2,317	2,349
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 of 2024. 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)		2025	2026	2027	2028	2029
En route charging zone 1	Ireland	5,627	5,795	5,920	6,011	5,809
Terminal charging zone 1	Ireland - TCZ	1,372	1,413	1,444	1,467	1,416
Total forecasted costs for the concerned entity		6,999	7,208	7,365	7,478	7,225

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 of the performance plan (in nominal terms in '000 national currency)		2025	2026	2027	2028	2029
En route charging zone 1	Ireland	3,378	3,487	3,529	3,403	3,735
Terminal charging zone 1	Ireland - TCZ	845	872	882	851	934
Total forecasted costs for the concerned entity		4,223	4,358	4,412	4,254	4,669

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) 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?	No
If yes, please provide the description and justification of the changes and impact(s) on the determined costs and/or baseline.	
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
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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 IAA's Air Navigation Services Division (ANS), 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 from 2024.

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

As noted in the supporting documentation, the IAA pension costs have reduced as part of the subsequent performance target revision under Article 14, due to a reduction in the contribution rate.

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 oversight costs are fully allocated to the NSA. A proportion of the IAA's core costs are also allocated to the Search and Rescue division. These 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- hence the table below is zero.

Total search and rescue costs for the entity providing search and rescue services (in nominal terms in '000 national currency)	2025	2026	2027	2028	2029
Determined costs for en route charging zone(s) in the scope of the performance plan	0	0	0	0	0
Determined costs for terminal charging zone(s) in the scope of the performance plan	0	0	0	0	0
Forecasted search and rescue costs outside the scope of the performance plan	0	0	0	0	0

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?	Yes
If yes, please provide the description and justification of the changes and impact(s) on the determined costs and/or baseline.	
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
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3.4.6 - Determined costs assumptions - AirNav Ireland

3.4.6.1 - Operating costs

a) Staff costs

Number of entries	10
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#	Staff costs building blocks (in nominal terms in '000 national currency)	Description of the composition of each item	Charging zones	Actual	Actual	Determined				
				2023	2024	2025	2026	2027	2028	2029
1	Operational ATCOs	Operational ATCOs	En-route charging zones		38,807	40,114	41,697	42,903	45,031	46,192
			Terminal charging zones		6,708	6,705	6,835	6,993	7,237	7,401
2	Station Managers	Station Managers	En-route charging zones		3,859	4,448	4,649	4,799	4,968	5,141
			Terminal charging zones		667	744	762	782	799	824
3	ATM Specialists	ATM Specialists	En-route charging zones		1,307	2,433	2,519	2,599	2,686	2,778
			Terminal charging zones		176	311	322	332	343	355
4	Corporate Services	Includes IT,Finance, HR, Property and Facilities, and Sustainability	En-route charging zones	4,643	5,588	6,054	6,369	6,587	6,823	7,071
			Terminal charging zones	900	1,131	1,161	1,222	1,263	1,309	1,356
5	Data Assistant	Data Assistants	En-route charging zones	2,480	2,944	3,031	3,161	3,262	3,371	3,487
			Terminal charging zones	291	358	349	364	376	388	402
6	FMP/AMC	Roles related to the return of FMP/AMC functions	En-route charging zones	0	0	267	556	574	593	614
			Terminal charging zones	0	0	84	176	181	187	194
7	Engineer	Engineers	En-route charging zones	8,529	12,631	13,338	13,761	14,311	14,937	15,562
			Terminal charging zones	1,498	2,353	2,354	2,428	2,526	2,636	2,746
8	Operations Management Support	Operations Management Support	En-route charging zones	5,984	7,611	9,191	9,839	10,542	11,034	11,422
			Terminal charging zones	960	1,308	1,496	1,602	1,716	1,796	1,859
9	Pension Payout Cost	Fixed pension contributions	En-route charging zones	14,617	4,168	4,149	4,137	4,115	4,101	4,086
			Terminal charging zones	2,444	728	694	687	681	674	670
10	ATCOs	Operational ATCOs, Station Managers, ATM Specialists (for 2023)	En-route charging zones	38,548						
			Terminal charging zones	6,669						
Total staff costs			En-route charging zones	74,800	76,914	83,025	86,689	89,691	93,544	96,354
			Terminal charging zones	12,761	13,429	13,898	14,398	14,850	15,369	15,807

Accounting provisions included in total staff costs	The IAA does not consider that 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.	En-route charging zones	0	0	0	0	0	0	0
		Terminal charging zones	0	0	0	0	0	0	0

Assumptions underlying the determined	Detail on the assumptions underlining the determined pension costs and expected	En-route charging zones	14,611	13,195	12,707	13,156	13,394	13,700	13,915
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pension costs and expected evolution over Reference Period 4 (for Main ANSP please refer to tab 3.4.7)	evolution are provided in Tab 3.4.7.	Terminal charging zones	2,446	2,196	2,097	2,178	2,218	2,268	2,304
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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 of 2024.									

b) Other operating costs	Number of entries	7
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#	Other operating costs building blocks (in nominal terms in '000 national currency)	Description of the composition of each item	Charging zones	Actual	Actual	Determined				
				2023	2024	2025	2026	2027	2028	2029
1	Travel	Cost lines relating to travel expenses	En-route charging zones	916	1,143	1,280	1,302	1,325	1,350	1,378
			Terminal charging zones	147	224	241	245	249	254	259
2	Training	Costs lines relating to training	En-route charging zones	5,919	6,795	8,252	10,889	8,295	10,027	11,665
			Terminal charging zones	1,402	1,647	1,925	2,540	1,935	2,339	2,721
3	Utilities	Cost lines relating to utility costs	En-route charging zones	541	1,941	2,174	2,211	2,249	2,293	2,340
			Terminal charging zones	120	570	615	625	636	648	661
4	Telecommunications	Cost lines relating to telecoms	En-route charging zones	2,260	2,168	2,549	2,609	2,672	2,745	2,816
			Terminal charging zones	359	351	398	407	417	428	439
5	Operational	Cost lines relating to other operational spending	En-route charging zones	6,588	6,236	7,688	8,623	9,462	8,881	9,185
			Terminal charging zones	1,767	1,664	1,964	2,198	2,403	2,268	2,348
6	Subscriptions	Cost lines relating to subscriptions	En-route charging zones	364	419	550	548	548	547	547
			Terminal charging zones	77	92	117	116	116	116	116
7	Administration	Cost lines relating to administration	En-route charging zones	12,876	12,128	14,383	14,799	15,222	15,689	16,186
			Terminal charging zones	3,292	2,873	3,287	3,378	3,468	3,569	3,676
Total other operating costs			En-route charging zones	29,464	30,829	36,877	40,982	39,774	41,531	44,117
			Terminal charging zones	7,163	7,421	8,547	9,509	9,225	9,622	10,221

Accounting provisions included in total other operating costs		En-route charging zones	0	0	0	0	0	0	0
		Terminal charging zones	0	0	0	0	0	0	0

	The total telecoms costs have been allocated 87% to En Route and 13% to Terminal. This allocation	En-route charging zones	753	723	850	870	891	915	939
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Costs for ground-ground communication services	to En Route and 13% to Terminal. This allocation was based on a weighted average for the structure of spend. Proportions within AirNav Ireland's 2024 budget were used as the basis for the allocation of costs to En Route and Terminal on the basis that the split of costs by activity and location remain relatively static. A third of the En Route and Terminal totals have been allocated in respect of each category. This approach has been adopted as there is no other obvious approach to draw on.	Terminal charging zones	120	117	133	136	139	143	146
Costs for air-ground communication services via terrestrial link	The total telecoms costs have been allocated 87% to En Route and 13% to Terminal. This allocation was based on a weighted average for the structure of spend. Proportions within AirNav Ireland's 2024 budget were used as the basis for the allocation of costs to En Route and Terminal on the basis that the split of costs by activity and location remain relatively static. A third of the En Route and Terminal totals have been allocated in respect of each category. This approach has been adopted as there is no other obvious approach to draw on.	En-route charging zones	753	723	850	870	891	915	939
		Terminal charging zones	120	117	133	136	139	143	146
Costs for air-ground communications services via satellite link	The total telecoms costs have been allocated 87% to En Route and 13% to Terminal. This allocation was based on a weighted average for the structure of spend. Proportions within AirNav Ireland's 2024 budget were used as the basis for the allocation of costs to En Route and Terminal on the basis that the split of costs by activity and location remain relatively static. A third of the En Route and Terminal totals have been allocated in respect of each category. This approach has been adopted as there is no other obvious approach to draw on.	En-route charging zones	753	723	850	870	891	915	939
		Terminal charging zones	120	117	133	136	139	143	146

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.

Communications: The total telecoms costs have been allocated 87% to En Route and 13% to Terminal. This allocation was based on a weighted average for the structure of spend. The proportions within AirNav Ireland's 2024 budget are used as the basis of cost allocation to En Route and Terminal on the basis that the split of costs by activity and location remain relatively static. 33.3% of the En Route and Terminal totals were then allocated to the En Route and Terminal subtotals for each of the three categories.

c) Exceptional items

Number of entries	0
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Accounting provisions included in total exceptional items	En-route charging zones								
	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
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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 existing 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 documents of 2024.

Cost of capital assumptions	Description of each item
NBV fixed assets	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.
	Assets are depreciated on a straightline 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 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, and in the financial model.

Adjustments total assets	None
Net current assets	None - Net current assets are not included in the cost of capital calculation.
Cost of capital %	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.
Return on equity	The pre-tax return on equity is 7.3% in real terms across RP4. The cost of equity is estimated using the Capital Asset Pricing Model (CAPM). The 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.
Average interest on debts	The average interest on debts is 1.17% in real terms (therefore ranging from 2.9% 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 converted to real debt costs using the Fisher equation and the inflation rate. This leads to a real cost of debt of 1.17%.
Share of financing through equity	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. 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
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#	Staff costs building blocks (in nominal terms in '000 national currency)	Description of the composition of each item	Charging zones	Actual	Actual	Determined				
				2023	2024	2025	2026	2027	2028	2029
1	Staff costs	Staff costs are determined based on a bottom-up assessment of MET ASD's forecast staffing profile over RP4.	En-route charging zones	3,635	4,171	4,558	4,680	4,762	4,854	4,664
			Terminal charging zones	909	1,043	1,139	1,170	1,190	1,214	1,166
Total staff costs			En-route charging zones	3,635	4,171	4,558	4,680	4,762	4,854	4,664
			Terminal charging zones	909	1,043	1,139	1,170	1,190	1,214	1,166

Accounting provisions included in total staff costs		En-route charging zones	0	0	0	0	0	0	0	0
		Terminal charging zones	0	0	0	0	0	0	0	0

Assumptions underlying the determined pension costs and expected evolution over Reference Period 4 (for Main ANSP please refer to tab 3.4.7)	Pension costs for MET ASD are based 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.	En-route charging zones	327	501	697	716	728	742	713
		Terminal charging zones	82	125	174	179	182	186	178

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 of October 2024, with the IAA's assessment of the substantiation also provided.

b) Other operating costs

Number of entries	1
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#	Other operating costs building blocks (in nominal terms in '000 national currency)	Description of the composition of each item	Charging zones	Actual	Actual	Determined				
				2023	2024	2025	2026	2027	2028	2029
1	Other operating costs	Other Operating Costs consist of both Core and Direct Other Operating Costs.	En-route charging zones	2,610	2,832	2,852	2,879	2,955	2,990	3,018
			Terminal charging zones	653	708	678	684	703	711	718
Total other operating costs			En-route charging zones	2,610	2,832	2,852	2,879	2,955	2,990	3,018
			Terminal charging zones	653	708	678	684	703	711	718

Accounting provisions included in total other operating costs		En-route charging zones	0	0	0	0	0	0	0
		Terminal charging zones	0	0	0	0	0	0	0

Costs for ground-ground communication services	N/A	En-route charging zones							
		Terminal charging zones							
Costs for air-ground communication services via terrestrial link	N/A	En-route charging zones							
		Terminal charging zones							
Costs for air-ground communications services via satellite link	N/A	En-route charging zones							
		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 of 2024.									

c) Exceptional items

Number of entries	1
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#	Exceptional items building blocks (in nominal terms in '000 national currency)	Description of the composition of each item	Charging zones	Actual	Actual	Determined				
				2023	2024	2025	2026	2027	2028	2029
1	EUMETSAT		En-route charging zones	823	1,073	1,102	1,180	1,130	1,132	1,160
			Terminal charging zones	206	268	276	295	283	283	290
Total exceptional items			En-route charging zones	823	1,073	1,102	1,180	1,130	1,132	1,160
			Terminal charging zones	206	268	276	295	283	283	290

Accounting provisions included in total exceptional items		En-route charging zones	0	0	0	0	0	0	0
		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
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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
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	12,707	13,156	13,394	13,700	13,915
Terminal activity	2,097	2,178	2,218	2,268	2,304
Other activities					
Total pension costs	14,804	15,334	15,612	15,969	16,219

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
--	----

<Staff category name>	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	AirNav Ireland has advised that this data is commercially confidential, so it has not been made publically available. The unredacted version of this tab will be provided directly to the PRB/EC on a confidential basis.				
Employer % contribution rate to this scheme					
Total pension costs in respect of this scheme	1,387	1,852	2,318	2,608	3,032
Number of employees the employer contributes for in this scheme	113	144	171	187	210

Hybrid Scheme	2025D	2026D	2027D	2028D	2029D
Total pensionable payroll to which this scheme applies	AirNav Ireland has advised that this data is commercially confidential, so it has not been made publically available. The unredacted version of this tab will be provided directly to the PRB/EC on a confidential basis.				
Employer % contribution rate to this scheme					
Total pension costs in respect of this scheme	2,478	2,582	2,614	2,645	2,651
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 Scheme
--	-----------------------------

Does the ANSP assume liability for meeting future obligations for the occupational "Defined benefits" scheme?	Select
---	--------

	2025D	2026D	2027D	2028D	2029D
Total pensionable payroll to which this scheme applies	AirNav Ireland has advised that this data is commercially confidential, so it has not been made publically available. The unredacted version of this tab will be provided directly to the PRB/EC on a confidential basis.				
Total pension costs in respect of this scheme	10,448	10,617	10,672	10,661	10,610
- service costs (current and past)					
- net interest on the defined benefits liability /assets					
Net funding surplus/deficit					
Net funding surplus/deficit at 1 January	AirNav Ireland has advised that this data is commercially confidential, so it has not been made publically available. The unredacted version of this tab will be provided directly to the PRB/EC on a confidential basis.				
- benefits paid					
- contributions to the fund					
Net funding surplus/deficit at 31 December					
Actuarial assumptions					
% discount rate	This data may be commercially confidential, so it has not been made publically available. The unredacted version of this tab will be provided directly to the PRB/EC on a confidential basis.				
% projected increase in benefits					
% annual increase in salaries					
% expected return on plan assets					
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
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 committed 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 considerably 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.

3.4.8 - Interest rate assumptions for loans financing the provision of air navigation services

AirNav Ireland

Select number of loans	Select
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Interest rate assumptions for loans financing the provision of air navigation services (Amounts in nominal terms in '000 national currency)					
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Other loans	2025D	2026D	2027D	2028D	2029D
Description	Drop down selection does not allow 'zero'. AirNav Ireland currently does not have any 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. As set out in tab 3.5, as well the ATFM delay KPI, the En Route capacity targets now include KPIs in respect of those specific staffing levels too, and we have included associated financial incentive schemes. 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.

The summary of all measures included to improve the AirNav Ireland capacity performance is included in full in Annex R.

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

Number of capacity measures, which induce additional costs	8
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AirNav Ireland					
Measure #1: Increase ATCO staffing levels	2025D	2026D	2027D	2028D	2029D
Associated additional costs (nominal terms in '000 national currency)	4,014	6,440	7,308	9,376	10,020
Description and justification of the additional determined costs of the measure					
Please refer to Annex R.					

AirNav Ireland					
Measure #2: Recruitment of new Engineers	2025D	2026D	2027D	2028D	2029D
Associated additional costs (nominal terms in '000 national currency)	3,313	3,493	3,703	3,952	4,184
Description and justification of the additional determined costs of the measure					
Please refer to Annex R.					

AirNav Ireland					
Measure #3: Recruitment of new OMS staff	2025D	2026D	2027D	2028D	2029D
Associated additional costs (nominal terms in '000 national currency)	2,458	2,815	3,290	3,536	3,660
Description and justification of the additional determined costs of the measure					
Please refer to Annex R.					

AirNav Ireland					
Measure #4: Other Operating Cost Measures	2025D	2026D	2027D	2028D	2029D
Associated additional costs (nominal terms in '000 national currency)	3,367	4,046	4,656	3,868	3,908
Description and justification of the additional determined costs of the measure					

Please refer to Annex R.

AirNav Ireland					
Measure #5: Investment in Main ATM System	2025D	2026D	2027D	2028D	2029D
Associated additional costs (nominal terms in '000 national currency)	668	1,457	2,641	3,039	4,691
Description and justification of the additional determined costs of the measure					
Please refer to Annex R.					

AirNav Ireland					
Measure #6: Investment in Contingency ATM System	2025D	2026D	2027D	2028D	2029D
Associated additional costs (nominal terms in '000 national currency)	0	183	721	702	789
Description and justification of the additional determined costs of the measure					
Please refer to Annex R.					

AirNav Ireland					
Measure #7: Investment in RADAR Systems	2025D	2026D	2027D	2028D	2029D
Associated additional costs (nominal terms in '000 national currency)	67	458	1,353	1,730	1,900
Description and justification of the additional determined costs of the measure					
Please refer to Annex R.					

AirNav Ireland					
Measure #8: Minor Investments Necessary for Capacity	2025D	2026D	2027D	2028D	2029D
Associated additional costs (nominal terms in '000 national currency)	19	115	314	893	1,422
Description and justification of the additional determined costs of the measure					
Please refer to Annex R.					

	2025D	2026D	2027D	2028D	2029D
Total additional costs of measures ('000 national currency)	13,906	19,007	23,987	27,095	30,573

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	9,785	12,748	14,301	16,864	17,864
of which, pension costs	1,909	2,413	2,610	2,933	3,032
Other operating costs	3,367	4,046	4,656	3,868	3,908
Depreciation	265	989	2,573	3,149	5,086
Cost of capital	490	1,224	2,457	3,215	3,715
Exceptional items					
Total additional costs of measures	13,906	19,007	23,987	27,095	30,573

	2025D	2026D	2027D	2028D	2029D
Total additional costs of measures ('000 national currency)	13,906	19,007	23,987	27,095	30,573

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 -1.5%, and the long-term DUC trend reduces to -1.1%. These outperform the EU-wide target trends of -1.2% and -1%. 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 targets in respect of the En Route capacity KPIs.

3.4.10 - Restructuring costs

3.4.10.1 Restructuring costs from previous reference periods to be recovered in RP4

Restructuring costs from previous reference periods approved by the European Commission?	No
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3.4.10.2 Restructuring costs planned for RP4

Restructuring costs foreseen for RP4?	No
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Additional 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

Number of additional KPIs	2
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ATCO Staffing Levels

		Related KPA	Capacity				
		2025	2026	2027	2028	2029	
		Target	Target	Target	Target	Target	
National level	Annual Average Headcount	326	343	348	361	364	
	Description and explanation of how this additional KPI and targets support the achievement of the EU and local performance targets	Increasing ATCO staffing levels is the key to addressing the various capacity and resourcing issues we have identified, as set out in detail in the material provided alongside the draft Performance Plan template, which will also support the achievement of the local and consequently EU performance targets. This KPI, together with the associated incentive scheme, will ensure a strong incentive to deliver the staffing levels included in the Performance Plan assumptions, or else there will be a cost related unit rate adjustment to remove the associated cost from AirNav Ireland until it meets the KPI target.					

KPI details	
KPI description and rationale	The KPI is the annual average ATCO headcount.
Formula, metric and parameters	Please see the accompanying excel model, and Section 3 of our Final Decision of August 2025 on the target revision.
Data sources	Targets are based on our forecast efficient staffing level. Outturn performance will be based on data from AirNav Ireland, validated by the IAA and published in the annual cost and performance consultation.

Additional comments

Engineer Staffing Levels

		Related KPA	Capacity				
		2025	2026	2027	2028	2029	
		Target	Target	Target	Target	Target	
National level	Annual Average Headcount	116	117	117	118	119	
	Description and explanation of how this additional KPI and targets support the achievement of the EU and local performance targets	We have assessed that significantly increasing Engineer staffing levels is necessary to, in particular, deliver the investment programme, and in particular the major investments in the ATM systems which will enhance capacity (and performance in the other KPAs). Consequently, a KPI based on staffing levels together with a financial incentive scheme will generate a strong incentive to ensure these projects are not delayed through insufficient engineers.					

KPI details	
KPI description and rationale	The KPI is the annual average Engineer headcount.
Formula, metric and parameters	Please see the accompanying excel model, and Section 3 of our Final Decision of August 2025 on the target revision.
Data sources	Targets are based on our forecast efficient staffing level. Outturn performance will be based on data from AirNav Ireland, validated by the IAA and published in the annual cost and performance consultation.

Additional comments

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

[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.

As well as the aforementioned indicators, other indicators which are monitored include Aircraft Deviation from Clearance, Procedures, or Regulation. The rate of airborne deviations per flight hours, as well as ground deviations per aircraft movement at aerodromes, are monitored. Level Busts and Airspace Infringements per flight hours are also monitored.

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, stating that safety is its absolute priority. After failing to meet its EoS target in 2022, from 2025 onwards, AirNav Ireland will appoint staff permanently to ATM Occurrence Investigators (AOIs) roles in order to investigate occurrence reports in a timely manner. ATM Occurrence Investigators (AOIs) are ATCOs and engineers who operate on a rotational basis between operations and AOI duties. Previously, AOIs were diverted to frontline operational duties to cover staff shortages. The AOI designated roles will now ensure AirNav Ireland has sufficient capacity to investigate occurrence reports and act accordingly, helping it to achieve the EoS target, though this may be at the expense of the number of ATCOs available to roster.

AirNav Ireland has also developed a series of safety policies and procedures. It has developed a Human Factors (HF) Strategy which describes the steps that are required to integrate Human Performance into its SMS procedures to ensure regulatory compliance and safety performance. This strategy covers how AirNav Ireland can implement the assessment of human performance into the following elements: HF assessment of changes to the functional system, HF safety assessment, HF investigation of occurrences, HF education and training.

AirNav Ireland has sought to address fatigue management and stress amongst ATCOs by developing a Fatigue Risk Management Manual, including an ATCO Fatigue Policy and an ATCO Stress Management Policy aligned with EU Regulation 2017/373, aimed at identifying and managing ATCO fatigue and mitigating stress in air traffic control to enhance safety performance.

AirNav Ireland's Business Plan outlines the ANSP's Just Culture Policy and Safety Culture Survey, which ensure staff are at the centre of AirNav Ireland's safety culture. AirNav Ireland defines Just Culture as "A culture in which front-line operators or other persons are not punished for actions, omissions or decisions taken by them that are commensurate with their experience and training, but in which gross negligence, wilful violations and destructive acts are not tolerated". It is validated annually by CANSO Global Standard of Excellence 'Optimised Best Practice'.

In 2022 AirNav Ireland launched its third Safety Culture Survey which was designed to gain insight into the Safety Culture within the organisation, including Just Culture and reporting, management commitment to safety, communication, collaboration, risk handling and procedures and training. The questions in the survey were developed and approved by EUROCONTROL and workshops were set-up with operational personnel and senior management to review the outcomes of the survey, including the recommendations resulting from it.

As outlined in (d) below, the IAA cost forecasts have been developed to account for the additional staff AirNav Ireland intends to assign to meet the required level of safety performance though this must come at the expense of the expense of other KPAs (cost efficiency and/or capacity).

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 IAA 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 IAA 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 IAA'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 of October 2024.

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 nonetheless 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 from 2024.

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 plan
- 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)			3		
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 certain flight levels.				
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 provision of services in the cross-border area	2025	2026	2027	2028	2029
	Net saving	Net saving	Net saving	Net saving	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 area(s)	Located off the south east coast of Ireland, from FL195 to FL660, only.		
Rationale for establishing the cross-border area, including performance benefits	The BANBA box is located at a three way junction between the Shannon FIR and two busy ATC sectors in the London FIR. The traffic flows across the area are multidimensional, with flights climbing and descending in a short time frame. The box of delegated airspace is used to manage that complex flow of traffic. The THINK report has assessed that, in the absence of the BANBA box, the coordination workload with the UK sectors would be increased, and there would also be knock-on impacts for NATS, resulting in a reduction in capacity and less optimal trajectories. Although these impacts would primarily affect and be attributed to NATS, there would likely be ripple effects on AirNav Ireland impacting Cork and Dublin airports, including outbound delays on the ground at Cork and less optimal flight trajectories affecting both Cork and Dublin airports.		

Size of the cross-border area (km2)	2,222 km2				
Estimated annual number of flights	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 provision of services in the cross-border area	2025	2026	2027	2028	2029
	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 quantify specifically 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 area(s)	Located to the south of Ireland adjacent to the Shannon Oceanic Transition Area (SOTA) and French airspace, from FL245 to FL660 only.					
Rationale for establishing the cross-border area, including performance benefits	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 Shannon South Oceanic (SOTA) and Brest ACCs, without the need for a very short intervention by NATS. The absence of this box would result in a series of rapid transfers from DSNA to NATS to AirNav Ireland for westerly flights, and vice versa for easterly flights, leading to a collective increase in workload. Additionally, this arrangement enables efficient routing of north-south traffic from Ireland and Scotland to Spain, the absence of which would, based on the THINK analysis, lead to a deterioration in the horizontal flight efficiency of these routes in the Shannon FIR.					
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 ANSP in the cross-border area						
Air Traffic Control Service						
Annual cost incurred by the ANSP for the provision of services in the cross-border area	2025	2026	2027	2028	2029	
	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain	
Methodology used to estimate/establish these costs						
Aside from the benefit to NATS in the case of this delegation, which is reciprocated in the case of the Donegal airspace which primarily benefits AirNav Ireland as outlined above, it is difficult to specifically quantify the level of additional cost which would be required for AirNav Ireland to deliver the same level of environment performance in a counterfactual scenario in which this delegation arrangement was not in place, relative to the cost to AirNav Ireland of providing ATS in this box (above FL195 only).						
Have these costs been excluded from the determined costs in the scope of the performance plan?						No
No- see above.						
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						

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	The biggest performance benefit is expected to be the TopSky ATC One system, to be delivered in 2029. The upgraded system paves the way for advanced technologies such as virtualisation and artificial intelligence. The EXODUS initiative is committed to augmenting capacity, scalability, and resilience. It champions the more streamlined and eco-friendlier ATM journey capturing, to a substantial extent, SESAR's vision for Europe's virtualised future ATM landscape. The upgraded system architecture has allowed Thales to incorporate the latest technology, such as AI. This has allowed for manual tasks and business processes across eight key areas to be automated such as dynamic management of human/system resources, optimized routing and trajectory management for airspace users and flexible airspace utilization that minimizes constraints and maximizes access for all airspace users. The upgraded system will offer greater system capacity, enabling it to handle a higher volume of flights. As air travel demand continues to increase, having the ability to manage more flights efficiently is crucial for avoiding congestion and delays within the airspace. The upgraded ATM system is expected to be more resilient in terms of software, safety, and security. Improved resilience ensures better business continuity, minimizing disruptions due to technical failures or security breaches. This enhanced resilience directly contributes to maintaining the safety and security of air traffic operations. The new system operates using Java, a modern and widely used programming language. Re-coding most of the system in Java, ensures quick identification and resolution of vulnerabilities, bugs, and other issues, given its vast and active community. Java's platform-independent nature means that systems built with it can integrate more easily with other systems, reducing the chances of integration-related vulnerabilities. Java also comes with robust security features and libraries that can protect the system against various threats, which might be lacking in older languages. These modifications enable easier integration with third-party solutions, enhancing the system's adaptability. This updated system also features new capabilities such as Dynamic Airspace Management, Aircraft Capability Management, Virtual Central Operations, Open ATM, and Automatic Speech Recognition (exclusively for simulations).
Additional comments	It is expected that the new TopSky ATC One system will become operational at the end of RP4 and the service delivery contract with Thales is valid for 8 years. Before the new system is introduced, AirNav Ireland will invest in various COOPANS Roadmap Builds which will deliver enhancements to the current system capabilities including System Wide Information Management (SWIM) infrastructure and obsolescence of hardware and the TMCS (Technical Monitoring and Control System). This project also drives service improvement, provides increased system security, and enhances ATCO efficiency. It also addresses obsolescence issues which will ensure continuity and safety of the ATM service provided. The enhancements will also be procured through joint COOPANS contract negotiations to ensure the best possible market rates are achieved. Elements of the project have been delivered in RP3 with further upgrades to be introduced throughout RP4 with Builds scheduled for 2026 and 2027 ahead of the new system implementation. ☐

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 across 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-AF	Description of realised and/or planned investment(s) related to the deployment of s-AF	Relevant investments (Ref. # as per section 2)	RP4 determined costs related to the sub-AF (in national currency and in nominal terms)				
					2025	2026	2027	2028	2029
CP1-AF1 - Extended AMAN and Integrated AMAN/DMAN in High-Density 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	0	0	0	0	0
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	364099	396032	409803	433185	448477
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									

CP1-s-AF4.1 Enhanced short-term ATFCM measures	31/12/2022	31/12/2022	NMP Flow Application is in use.	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									
CP1-s-AF5.1 Common infrastructure components	31/12/2024	31/12/2024	SWIM Platform	N/A	446079	522224	582892	622045	627309
CP1-s-AF5.2 SWIM yellow profile technical infrastructure and specifications	31/12/2025	31/12/2025	SWIM Platform	N/A	446079	522224	582892	622045	627309
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	364653	409683	467292	508769	535025
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	400711	477531	541537	561079	584860
CP1-s-AF5.5 Cooperative network information exchange	31/12/2025	2029	Topsky ATC One IATS Upgrade CASDS	Major investments #A1, #A5	364099	408251	457889	479997	504724
CP1-s-AF5.6 Flight information exchange (yellow profile)	31/12/2025	2029	Topsky ATC One IATS Upgrade CASDS	Major investments #A1, #A5	364653	409683	460849	483430	510681
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	345375	360018	373408	388820	407026
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	345375	360018	373408	388820	407026
Total RP4 determined costs for common project related to the sub-functionalities across charging zones for the concerned entity					3,441,124	3,865,664	4,249,968	4,488,190	4,652,435

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.
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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 parameters adapted?		no	
	Dead band	Risk sharing band	Service units lower than plan		Service units higher than plan	
			% loss to be recovered	Max. charged if SUs 10% < plan	% additional revenue returned	Min. returned if 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 parameters adapted?		no	
	Dead band	Risk sharing band	Service units lower than plan		Service units higher than plan	
			% loss to be recovered	Max. charged if SUs 10% < plan	% additional revenue returned	Min. returned if 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	%	$\pm 2.0\%$
Max bonus ($\leq 2\%$)	% of DC	0.00%
Max penalty ($\geq$ Max bonus)	% of DC	1.00%

b) Pivot values - En route

Basis for the annual setting of pivot values	Fixed (equal to performance targets)
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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
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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	%	2%
Max bonus ($\leq 2\%$)	% of DC	0.00%
Max penalty ($\geq$ Max bonus)	% of DC	1.00%

b) Pivot values - Terminal

Basis for the annual setting of pivot values	Modulated
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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
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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 initially set a deadband of 0 minutes such that the penalty to AirNav Ireland would become payable if the pivot value is exceeded due to CRSTMP delay, but have added a small deadband following verification of completeness request to do so. The scheme is rebate-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 in combination with each other

5.3 - Optional incentives

Total maximum bonus for all optional incentives (≤2%):	0.0%	Total maximum penalty for optional incentives (≤4%):	4.0%
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Number of optional incentives	2
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Optional Incentive #1	Related KPA:	Capacity	Applies to:	Enroute
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Optional Incentive #1 details	
ANSP(s) concerned	AirNav Ireland
Incentive description and rationale	A cost-related, rebate-only incentive scheme, applying to the additional KPI in relation to annual average ATCO headcount summarised at tab 3.5.
Maximum bonus (expressed as a % of the determined costs)	0%
Maximum penalty (expressed as a % of the determined costs)	3%
Other parameters, formulas and metrics	Please see the accompanying excel model, and Section 3 of our Final Decision of August 2025 on the target revision.
Data sources	Targets are based on our forecast efficient staffing level. Outturn performance will be based on data from AirNav Ireland, validated by the IAA.

Additional comments

Optional Incentive #2	KPA:	Capacity	Applies to:	Enroute
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Optional Incentive #2 details	
ANSP(s) concerned	AirNav Ireland
Incentive description and rationale	A cost-related, rebate-only incentive scheme, applying to the additional KPI in relation to annual average Engineer headcount summarised at tab 3.5.
Maximum bonus (expressed as a % of the determined costs)	0%
Maximum penalty (expressed as a % of the determined costs)	1%
Other parameters, formulas and metrics	Please see the accompanying excel model, and Section 3 of our Final Decision of August 2025 on the target revision.
Data sources	Targets are based on our forecast efficient staffing level. Outturn performance will be based on data from AirNav Ireland, validated by the IAA.

Additional comments

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 in respect of both the mandatory and discretionary KPIs. 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.