

# Performance Plan

# Finland

Fourth Reference Period (2025-2029)

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

Date of issue: 6 June 2025



# Table of Contents

---

## STRUCTURE AND PURPOSE

### TABLE OF CONTENT

### SIGNATORIES

## 1 INTRODUCTION

- 1.1 THE SITUATION
- 1.2 TRAFFIC FORECASTS
- 1.3 STAKEHOLDER CONSULTATION
- 1.4 LIST OF AIRPORTS SUBJECT TO THE PERFORMANCE AND CHARGING REGULATION
- 1.5 SERVICES UNDER MARKET CONDITIONS
- 1.6 FAB PROCESS
- 1.7 SIMPLIFIED CHARGING SCHEME

## 2 INVESTMENTS

- 2.0 SUMMARY OF INVESTMENTS
- 2.1 INVESTMENTS ANSP

## 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*
- 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 *ATCOs planning and training*
- 3.4 COST-EFFICIENCY TARGETS
  - 3.4.1 *Cost-efficiency KPI #1: Determined unit cost (DUC) for en route ANS*
  - 3.4.2 *Cost-efficiency KPI #2: Determined unit cost (DUC) for terminal ANS*
  - 3.4.3 *Cost allocation - ATSP/CNSP*
  - 3.4.4 *Cost allocation - METSP*
  - 3.4.5 *Cost allocation - NSA*
  - 3.4.6 *Determined costs assumptions*
  - 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 INTERDEPENDENCIES AND TRADE-OFFS

## 4 CROSS-BORDER INITIATIVES AND SESAR IMPLEMENTATION

- 4.1 CROSS-BORDER INITIATIVES AND SYNERGIES AT ANSP LEVEL
- 4.2 DEPLOYMENT OF SESAR COMMON PROJECT
- 4.3 CHANGE MANAGEMENT

## 5 TRAFFIC RISK SHARING ARRANGEMENTS AND INCENTIVE SCHEMES

- 5.1 TRAFFIC RISK SHARING PARAMETERS
- 5.2 CAPACITY INCENTIVE SCHEMES
  - 5.2.1 *Capacity incentive scheme - Enroute*
  - 5.2.2 *Capacity incentive scheme - Terminal*
- 5.3 OPTIONAL INCENTIVES

## **6 IMPLEMENTATION OF THE PERFORMANCE PLAN**

6.1 MONITORING OF THE IMPLEMENTATION PLAN

6.2 NON-COMPLIANCE WITH TARGETS DURING THE REFERENCE PERIOD

## **7 ANNEXES**

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

ANNEX B. REPORTING TABLES & ADDITIONAL INFORMATION (TERMINAL)

ANNEX C. CONSULTATION

ANNEX D. LOCAL TRAFFIC FORECASTS

ANNEX E. INVESTMENTS

ANNEX F. BASELINE VALUES (COST-EFFICIENCY)

ANNEX G. PARAMETERS FOR THE TRAFFIC RISK SHARING

ANNEX H. RESTRUCTURING MEASURES AND COSTS

ANNEX I. PARAMETERS FOR THE MANDATORY CAPACITY INCENTIVES

ANNEX J. OPTIONAL KPIs AND TARGETS

ANNEX K. OPTIONAL INCENTIVE SCHEMES

ANNEX L. JUSTIFICATION FOR SIMPLIFIED CHARGING SCHEME

ANNEX M. COST ALLOCATION

ANNEX N. CROSS-BORDER ANS

ANNEX O. JUSTIFICATIONS FOR THE LOCAL SAFETY TARGETS

ANNEX P. JUSTIFICATIONS FOR THE LOCAL ENVIRONMENT TARGETS

ANNEX Q. JUSTIFICATIONS FOR THE LOCAL CAPACITY TARGETS

ANNEX R. JUSTIFICATIONS FOR THE LOCAL COST-EFFICIENCY TARGETS

ANNEX S. INTERDEPENDENCIES

ANNEX T. OTHER MATERIAL

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

ANNEX V. CONSISTENCY OF INVESTMENTS WITH ATM MASTER PLAN

ANNEX Y. RESPONSES TO COMPLETENESS VERIFICATION


ANNEX Z. CORRECTIVE MEASURES\*

*\* Only as per Article 15(6) of the Regulation*

## Signatories

Performance plan details	
State name	Finland
Status of the Performance Plan	Final performance plan (Art. 16(a and b) of IR 2019/317)
Date of issue	6 June 2025
Date of adoption of Draft Performance Plan	23 September 2024
Date of adoption of Final Performance Plan	25 June 2025

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	
Lulu Ranne Minister of Transport and Communications	 <i>(electronically signed)</i>

Additional comments	
---------------------	--

Document change record		
Version	Date	Reason for change
Draft for consultation	3 July 2024	
Draft performance plan for adoption	11 September 2024	Input from consultation meeting (section 1.3), adjustments on investments, cost-efficiency. Terminal capacity target revised. Incentive scheme adjusted. Overall update on blank sections from first draft.
Amended draft performance plan	15 November 2024	Amendments based on the verification of completeness, see annex Y for the list of amendments.

## 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)
- 1.1.4 - Other general information relevant to the plan

### **1.2 - Traffic Forecasts**

- [1.2.1 - En route](#)
- [1.2.2 - Terminal](#)

### **1.3 - Stakeholder consultation**

- [1.3.1 - Overall outcome of the consultation of stakeholders on the performance plan](#)
- [1.3.2 - Specific consultation requirements of ANSPs and airspace users on the performance plan](#)
- [1.3.3 - Consultation of stakeholder groups on the performance plan](#)

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

- [1.4.1 - Airports as per Article 1\(3\) \(IFR movements  \$\geq\$  80 000\)](#)
- [1.4.2 - Other airports added on a voluntary basis as per Article 1\(4\)](#)

### **1.5 - Services under market conditions**

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

### **1.7 - Establishment and application of a simplified charging scheme**

- [1.7.1 - Scope of the simplified charging scheme](#)
- [1.7.2 - Conditions for the application of the simplified charging scheme](#)

### **Annexes of relevance to this section**

- ANNEX C. CONSULTATION
- ANNEX D. LOCAL TRAFFIC FORECASTS
- ANNEX L. JUSTIFICATION FOR SIMPLIFIED CHARGING SCHEME
- ANNEX Y. RESPONSES TO COMPLETENESS VERIFICATION

## 1 - INTRODUCTION

### 1.1 - The situation

NSA(s) responsible for drawing up the Performance Plan	Finnish Transport and Communications Agency Traficom
--	--

#### 1.1.1 - List of ANSPs and geographical coverage and services

Number of ANSPs	2		
ANSP name	Services	Type of entity	Geographical scope
Fintraffic ANS	ATS, CNS, AIS, ASM, ATFM, FPD	ATSP/CNSP	Helsinki FIR
FMI	MET	METSP	Helsinki FIR

#### 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 km<sup>2</sup>, 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)	0
--	---

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	4
---	---

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
LFV	Kvarken	Helsinki FIR
Avinor	Halti	Helsinki FIR
Avinor	Manto	Helsinki FIR
Avinor	Kirkenes TMA	Helsinki 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	2
--------------------------	---

Entity name	Domain of activity	Rationale for inclusion in the Performance Plan
Finnish Transport and Communications Agency Traficom	NSA	Article 22, 1. a)
Eurocontrol	International organisation (network)	Article 22, 1. c)

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

<b>En-route</b>	Number of en-route charging zones	1
En-route charging zone 1	Finland	
<b>Terminal</b>	Number of terminal charging zones	1
Terminal charging zone 1	Finland - TCZ	

#### 1.1.4 - Other general information relevant to the plan

Relevant local circumstances with high significance for performance target setting
Finland is one of those certain Member States which have lost, as a consequence of Russia's war of aggression against Ukraine, a significant share of the air traffic flows which they traditionally used to serve. That traffic reduction continues over RP4 to considerably impact the cost-efficiency of Fintraffic ANS.
Finland is expecting the Commission to take into account these exceptional circumstances as part of the assessment of the consistency of the local cost-efficiency performance targets.

Additional information

## 1.2 - Traffic Forecasts

### 1.2.1 - En route

#### En route Charging zone 1

Finland

#### En route traffic forecast

STATFOR October 2024 (Base)

STATFOR October 2024 (Base)	2022A	2023A	2024	2025	2026	2027	2028	2029	CAGR 2024-2029
IFR movements (thousands)	205	224	243	258	263	267	273	276	2,6%
IFR movements (yearly variation in %)		9,1%	8,4%	6,4%	1,9%	1,6%	1,9%	1,4%	
En route service units (thousands)	598	659	764	811	828	845	865	881	2,9%
En route service units (yearly variation in %)		10,2%	15,9%	6,1%	2,2%	2,0%	2,4%	1,9%	

### 1.2.2 - Terminal

#### Terminal Charging zone 1

Finland - TCZ

#### Terminal traffic forecast

STATFOR October 2024 (Base)

STATFOR October 2024 (Base)	2022A	2023A	2024	2025	2026	2027	2028	2029	CAGR 2024-2029
IFR movements (thousands)	66	71	76	81	82	83	85	86	2,5%
IFR movements (yearly variation in %)		7,0%	7,2%	6,6%	1,6%	1,7%	1,7%	1,0%	
Terminal service units (thousands)	81	90	97	104	107	110	113	115	3,4%
Terminal service units (yearly variation in %)		10,6%	8,1%	7,2%	3,1%	2,5%	2,6%	1,5%	

## 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

#### **Cost-efficiency**

Main points raised:

- Increased costs and especially increased staff costs (staff planning) despite reduced traffic levels and despite the relatively higher number of operations, clarifications asked for the consulted staff costs.
- Investment plans were not seen appropriate and only safety related and maintenance of existing systems should be expected. The users proposed to postpone any other than necessary replacement and renewal.
- Clarification asked regarding cost allocation.
- It was not supported to set the cost-efficiency target at higher level than the EU-wide targets justifying it with the exceptional traffic situation which differs from the overall European traffic evolution.

The staff costs are verified according to the planned staff numbers and estimated wage development. The traffic evolution in Finland differs significantly from the European level and thus the unit costs are not fully comparable to the EU-wide target.

The NSA finds Fintraffic ANS' investment plan justified.

#### **Cost of capital**

After consultation Finland updated WACC calculation slightly by combining enroute and terminal cost bases and asset bases for the sense check. This is because the same WACC is used for both enroute and terminal services and our opinion is that the matter should be viewed as a whole. This means that any values are not capped any more as a result of the sense check. In a consultation presentation we used only en-route values and WACC values were capped for years 2027 and 2029.

In their written consultation letter (2.9.2024) IATA is of the opinion that credit spread and asset beta parameters are overestimated in PRB's calculation because Finland has used PRB's methodology to calculate all parameter values.

Traficom would like to state the following. Applying the WACC methodology is not exact science in a sense that there are different methodologies to estimate the parameters. There is no single approach that could be considered as superior, they all have their pros and cons and all can be justified (better or worse). PRB's methodology is one way to calculate WACC and can of course be challenged but Traficom sees it well justified and most importantly it gives a uniform methodology for all ANSP's which we see the most important factor when assessing the methodology.

PRB's paper "Study on cost of capital, methodology review and update", June 2024 justifies the WACC model and parameter estimates. Traficom's opinion is that PRB's credit spread and asset beta values are consistently justified and are part of the whole "story". When we have accepted this PRB's approach as a whole we do not see as acceptable to pick lower (or higher) parameter values from any benchmark model for any parameters. Hence, Traficom concludes that credit spread and asset beta values are justified as they are and should not be changed. Fintraffic ANS net current assets takes into account short-term receivables and short-term liabilities and does not include the regulatory recoveries.

#### **Capacity and capacity incentive scheme**

The capacity incentive scheme was changed after the consultation. The maximum penalty was changed from 1 % to 2 % on enroute and from 1 % to 1,5 % on terminal. Pivot value for terminal was changed from 0,02 to 0,01. Terminal capacity target was reduced from 0,15 min/flight to 0,14 min/flight.

### 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	Minor adjustments to determined costs and cost of capital.
New and existing investments, and in particular new major investments, including their expected benefits	Yes	Added more details on investments
Charging policy	Yes	Charging policy itself was found acceptable. Certain elements for unit price 2025 under further consideration.
Maximum financial advantages and disadvantages for the mandatory incentive scheme on capacity	Yes	Maximum financial disadvantages changed after consultation.
Symmetric range ("dead band") for the purpose of the mandatory incentive scheme on capacity	Yes	No comments received
Where applicable, decision to modulate performance targets for the purpose of pivot values to be used for the mandatory incentive scheme on capacity	Yes	No comments received
Establishment or modification of charging zones	No	
Where applicable, values of the modulated parameters for the traffic risk sharing mechanism	No	
Where applicable, decision to apply the simplified charging scheme	No	
Where applicable, decision to diverge from the STATFOR base forecast	No	

### 1.3.3 - Consultation of stakeholder groups on the performance plan

#1 - ANSPs	
Stakeholder group composition	Fintraffic ANS, main service provider in Finland
Dates of main meetings / correspondence	Continuous email exchange and meetings during the drafting process. Fintraffic ANS was also present in the consultation meeting and they held a presentation on investments. Fintraffic ANS provided a benchmark calculation for WACC 12 August 2024.
Main issues discussed	Staff costs, number of staff, investment plan and asset base, other operating cost evolution, cost allocation, cost of capital.
Actions agreed upon	Fintraffic ANS to provide detailed justifications regarding the main issues above.
Points of disagreement and reasons	Traffic forecast used. ANSP proposed to use local traffic forecasts or STATFOR high forecast instead of base. The proposal was made after the consultation and the NSA did not accept the proposal as the other forecast has to be consulted according to the regulation.
Final outcome of the consultation	WACC used is based on PRB methodology for calculating WACC.
Additional comments	
Cost verification audits for baseline values and determined costs have taken place while preparing the draft performance plan. Points of discussions have been raised and handled through the administrative audit process.	

<b>#2 - Airspace Users</b>	
Stakeholder group composition	IATA, Finnair, SAS, Norwegian, Fedex, Qatar Airways
Dates of main meetings / correspondence	Consultation meeting on 20 August 2024. Written comments from Finnair on 30 August 2024. Written comments from IATA on 3 September 2024.
Main issues discussed	Cost increases/cost-efficiency including increased staff costs despite reduced traffic levels, investment costs, cost of capital and approach costs allocation to enroute. Targets on safety and environment, capacity incentive scheme.
Actions agreed upon	NSA to review capacity targets and incentive schemes
Points of disagreement and reasons	Staff costs, investment costs, cost efficiency targets. NSA finds current figures justified after thorough cost verification process.
Final outcome of the consultation	Capacity incentive scheme and TN capacity target changed.

Additional comments	
Many of the comments from IATA and Finnair were about the unit price calculation for years 2025 and 2026. These comments are being examined under the preparation of the final unit rate calculations for 2025 and also considered when preparing the initial unit rate calculations for 2026.	

<b>#3 - Professional staff representative bodies</b>	
Stakeholder group composition	Finnish Air Traffic Controllers Association
Dates of main meetings / correspondence	Consultation meeting on 20 August 2024.
Main issues discussed	No specific issues raised. Discussion on pension scheme and cost allocation between approach and enroute.
Actions agreed upon	
Points of disagreement and reasons	
Final outcome of the consultation	

Additional comments	

<b>#4 - Airport operators</b>	
Stakeholder group composition	Finavia
Dates of main meetings / correspondence	Consultation meeting on 20 August 2024. E-mail exchange on airport capacity.
Main issues discussed	Airport capacity, delays, runway/taxiway renovations.
Actions agreed upon	Finavia to provide NSA details on runway/taxiway renovation plans for RP4.
Points of disagreement and reasons	
Final outcome of the consultation	

Additional comments	

<b>#5 - Airport coordinator</b>	
Stakeholder group composition	n/a
Dates of main meetings / correspondence	
Main issues discussed	
Actions agreed upon	

Points of disagreement and reasons	
Final outcome of the consultation	

Additional comments

<b>#6 - Other (specify)</b>	
Stakeholder group composition	n/a
Dates of main meetings / correspondence	
Main issues discussed	
Actions agreed upon	
Points of disagreement and reasons	
Final outcome of the consultation	

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
EFHK	Helsinki	Finland - TCZ	72 296	132 701	141 858	115 618

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

Number of airports	0		
ICAO code	Airport name	Charging Zone	Additional information

Additional comments

### 1.5 - Services under market conditions

Number of services under market conditions	0
--	---

--

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

Description of the process
Not applicable

### 1.7 - Establishment and application of a simplified charging scheme

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

## SECTION 2: INVESTMENTS

---

### **2.0 - Summary of investments**

#### **2.1 - Investments - Fintraffic ANS**

- 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 - FMI**

- 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

### Fintraffic ANS

	Total value of the asset (capex or contractual leasing value) (in <b>national currency</b> )	Value of the assets allocated to ANS in the scope of the performance plan (in <b>national currency</b> )	Elements for the calculation of the determined costs of investments (net book value (NBV), depreciation and cost of leasing) (in <b>national currency</b> )					
				2025	2026	2027	2028	2029
New major investments for RP4 (Table A)	38 100 000	38 100 000	Average NBV	3 000 000	6 000 000	10 000 000	12 000 000	32 369 648
			Depreciation	0	0	0	0	768 334
			Cost of leasing	0	0	0	0	0
Other new investments for RP4 (below 5M€) (Table B)	8 000 000	49 436 284	Average NBV	8 059 940	16 600 487	23 880 465	24 149 749	23 893 037
			Depreciation	287 639	1 344 494	3 039 733	3 546 177	4 627 101
			Cost of leasing	440 950	1 071 170	1 476 405	1 905 254	2 624 496
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)	59 567 560	55 601 402	Average NBV	13 214 642	9 823 784	6 804 296	4 026 861	2 034 126
			Depreciation	4 633 577	4 036 006	3 656 488	3 220 392	1 744 870
			Cost of leasing	1 373 541	1 084 323	823 432	743 369	688 266
Total for the ANSP in RP4	105 667 560	143 137 686	Average NBV	24 274 582	32 424 271	40 684 761	40 176 610	58 296 811
			Depreciation	4 921 216	5 380 501	6 696 221	6 766 570	7 140 305
			Cost of leasing	1 814 491	2 155 493	2 299 836	2 648 623	3 312 762

**FMI**

	Total value of the asset (capex or contractual leasing value) (in <b>national currency</b> )	Value of the assets allocated to ANS in the scope of the performance plan (in <b>national currency</b> )	Elements for the calculation of the determined costs of investments (net book value (NBV), depreciation and cost of leasing) (in <b>national currency</b> )					
				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)	0	3 260 351	Average NBV	590 625	1 329 750	1 785 375	1 954 125	1 768 500
			Depreciation	84 375	205 875	286 875	337 500	354 375
			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)	0	0	Average NBV	0	0	0	0	0
			Depreciation	0	0	0	0	0
			Cost of leasing	0	0	0	0	0
Total for the ANSP in RP4	0	3 260 351	Average NBV	590 625	1 329 750	1 785 375	1 954 125	1 768 500
			Depreciation	84 375	205 875	286 875	337 500	354 375
			Cost of leasing	0	0	0	0	0

## 2.1 - Investments - Fintraffic ANS

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

### 2.1.1 - Investments from RP4

<b>Table A - Number of new major investments (i.e. above 5 M€) for RP4</b>	2
--	---

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	ATM System renewal	30 100 000	30 100 000	Average NBV	3 000 000	6 000 000	10 000 000	10 000 000	27 369 648	10	1.11.2029	100 %	0 %
				Depreciation					501 667				
				Cost of leasing					0				
A2	HK Remote Tower	8 000 000	8 000 000	Average NBV				2 000 000	5 000 000	10	1.9.2029	40 %	60 %
				Depreciation					266 667				
				Cost of leasing									
<b>Subtotal of new major investments from RP4</b>		<b>38 100 000</b>	<b>38 100 000</b>	<b>Average NBV</b>	<b>3 000 000</b>	<b>6 000 000</b>	<b>10 000 000</b>	<b>12 000 000</b>	<b>32 369 648</b>				
				<b>Depreciation</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>768 334</b>				
				<b>Cost of leasing</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>				

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

<b>Table B - Other new investments (below 5M€) from RP4</b>
---

	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*
<b>Subtotal of other new investments from RP4</b>	<b>76 364 284</b>	<b>49 436 284</b>	<b>Average NBV</b>	<b>8 059 940</b>	<b>16 600 487</b>	<b>23 880 465</b>	<b>24 149 749</b>	<b>23 893 037</b>			<b>74 %</b>	<b>26 %</b>
			<b>Depreciation</b>	<b>287 639</b>	<b>1 344 494</b>	<b>3 039 733</b>	<b>3 546 177</b>	<b>4 627 101</b>				
			<b>Cost of leasing</b>	<b>440 950</b>	<b>1 071 170</b>	<b>1 476 405</b>	<b>1 905 254</b>	<b>2 624 496</b>				

\* 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

<b>Table C - Number of major investments (i.e. above 5 M€) from RP3 performance plan</b>	0
--	---

<b>Table D - Number of major investments (i.e. above 5 M€) added during RP3</b>	0
---	---

### 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 <b>national currency</b> )	Value of the assets allocated to ANS in the scope of the performance plan (in <b>national currency</b> )	Elements for the calculation of the determined costs of investments (net book value (NBV), depreciation and cost of leasing) (in <b>national currency</b> )					Lifecycle (Amortisation period in years)	Planned date of entry into operation	Allocation (%)*		
				2025	2026	2027	2028			2029	En route*	Terminal*
<b>Subtotal of existing investments from previous RPs</b>	<b>59 567 560</b>	<b>55 601 402</b>	<b>Average NBV</b>	<b>13 214 642</b>	<b>9 823 784</b>	<b>6 804 296</b>	<b>4 026 861</b>	<b>2 034 126</b>				
			<b>Depreciation</b>	<b>4 633 577</b>	<b>4 036 006</b>	<b>3 656 488</b>	<b>3 220 392</b>	<b>1 744 870</b>			82 %	18 %
			<b>Cost of leasing</b>	<b>1 373 541</b>	<b>1 084 323</b>	<b>823 432</b>	<b>743 369</b>	<b>688 266</b>				

\* 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

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	ATM System renewal		Reference #	A1	Total value of the asset		30 100 000	
Main category of the investment	New ATM system	Overhaul of existing ATM system	Other ATM	CNS	Infrastructure	Ancillary	Other	
		1						
Description of the asset	System evolution of the existing legacy system. This version will be compliant with the future regulation, namely Common Project.							
Is the investment mandated by a SES Regulation (i.e. PCP/CP1/Interoperability)? If yes please provide description/reference	Yes	Major part of the investment is to be compliant with the CP1 regulation. Namely AF3, AF5 and AF6.						
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 investment brings the legacy system to a new generation of system architecture addressing the challenges of sustainability, scalability, and security of the future. The system architecture allowing deployment of future technological and operational innovations in a much flexible and faster manner. The investment is in line with several of the European Strategic Development							
Level of impact of the investment	Network level	Major benefit/improvement: cost efficiency, capacity, emission reduction, safety,						
	Local level	Major benefit/improvement: cost efficiency, capacity, emission reduction, safety,						
Quantitative impact per KPA	Safety	Environment	Capacity	Cost Efficiency				
	Significant	Significant	Significant	Major				
Benefits for airspace users and results of the consultation of airspace users' representatives	System evolution with advanced safety nets and trajectory calculation provides means for safer service provision, more environmental friendly management of traffic flows. This allows for higher capacity and efficiency. The FINEST cooperation model with one common system and dynamic delegation of resources is the most cost efficient model in terms of procurement,							
Joint investment / partnership	Yes	If yes, please provide reference to joint project and/or indicate reference to cross-border initiatives		FINEST cooperation between Fintraffic ANS and EANS, Estonia. The cooperation model comprise joint procurements,				

<b>Name of new major investment 2</b>		<b>HK Remote Tower</b>		Reference #	<b>A2</b>	Total value of the asset		<b>8 000 000</b>	
Main category of the investment			New ATM system	Overhaul of existing ATM system	Other ATM	CNS	Infrastructure	Ancillary	Other
					1				
Description of the asset			Bring the major airport tower service provision to a digital environment (Remote tower) taking benefit of modular digital remote tower platforms.						
Is the investment mandated by a SES Regulation (i.e. PCP/CP1/Interoperability)? If yes please provide description/reference		No	Not directly mandated (yet), but included in the European ATM Master Plan as a strategic development object.						
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	Major benefit/improvement: service availability, scalability						
		Local level	Major benefit/improvement: Cost efficiency, Safety, Capacity						
Quantitative impact per KPA			Safety	Environment	Capacity	Cost Efficiency			
			Significant	Negligible	Significant	Significant			
Results of the consultation of 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	
Surveillance - replacing existing MSSR radars by S-Mode radars and GNSS interference resistant surveillance extension.	

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	Renewal of MSSR	Yes, SDO#9	7 050 000	7 500 000	Average NBV	450 000	2 300 000	4 000 000	5 000 000	7 050 000	Procurement of 4 S-mode MSSR radars
					Depreciation	0	57 000	491 000	699 000	944 000	
					Cost of leasing	0	0	0	0	0	
B2	GNSS interference resistant surveillance extension	Yes, SDO#9	2 600 000	2 600 000	Average NBV	800 000	1 250 000	2 600 000	1 779 000	1 283 000	SWAM-system
					Depreciation	0	156 000	482 000	482 000	497 000	
					Cost of leasing	0	0	0	0	0	
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 - FMI

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

### 2.2.1 - Investments from RP4

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

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*
<b>Subtotal of new major investments from RP4</b>		<b>0</b>	<b>0</b>	<b>Average NBV</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>			
				<b>Depreciation</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>			
				<b>Cost of leasing</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>			

\* 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*
<b>Subtotal of other new investments from RP4</b>	<b>4 830 150</b>	<b>3 260 351</b>	<b>Average NBV</b>	<b>590 625</b>	<b>1 329 750</b>	<b>1 785 375</b>	<b>1 954 125</b>	<b>1 768 500</b>			
			<b>Depreciation</b>	<b>84 375</b>	<b>205 875</b>	<b>286 875</b>	<b>337 500</b>	<b>354 375</b>			67 %
			<b>Cost of leasing</b>								33 %

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

### 2.2.2 - Investments from RP3

**Table C - Number of major investments (i.e. above 5 M€) from RP3 performance plan** 0

**Table D - Number of major investments (i.e. above 5 M€) added during RP3** 0

### 2.2.3 - Existing investments from previous reference periods

**Table E - Existing investments from previous RPs**

	Total value of the asset (capex or contractual leasing value) (in <b>national currency</b> )	Value of the assets allocated to ANS in the scope of the performance plan (in <b>national currency</b> )	Elements for the calculation of the determined costs of investments (net book value (NBV), depreciation and cost of leasing) (in <b>national currency</b> )					Lifecycle (Amortisation period in years)	Planned date of entry into operation	Allocation (%)*	
				2025	2026	2027	2028			2029	En route*
<b>Subtotal of existing investments from previous RPs</b>			<b>Average NBV</b>								
			<b>Depreciation</b>								
			<b>Cost of leasing</b>								

\* 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

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

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

Planned lifecycle overhaul of the MET observation systems as a lifecycle update (system hardware, data distribution hardware, sensors, back-up systems) at all airports (24). Upgrading sensor technology to improve the quality of automated observations to enable shift from manual observations to automated observations and SWIM services.

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	Lifecycle overhaul of the aviation weather observation systems		4 830 150	3 260 351	Average NBV	590 625	1 329 750	1 785 375	1 954 125	1 768 500	Software, data distribution hardware, sensor renewal and upgrades, new back-up systems
					Depreciation	84 375	205 875	286 875	337 500	354 375	
					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						

## 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				
Fintraffic ANS		2025	2026	2027	2028	2029
		Target	Target	Target	Target	Target
	Safety policy and objectives	C	C	C	C	C
	Safety risk management	C	C	C	C	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

N/A. Targets in line with the EU-wide targets.

*\* Refer to Annex O, if necessary.*

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

Safety risk management improvement measures by defining the risk generic risk-base-line as well as setting the values for acceptable level of safety related risks for the company risk module (IMS). Improving the safety risk review process. Follow up actions related to airspace reservation process deviations and monitoring the effectiveness of corrective actions. Modification of SMS and change management process in order to fulfill the continuous compliance of 2017/373 requirements has been done and are supported by Compliance Monitoring Function. The safety performance targets are systematically reviewed by the safety management top-forums that are also incorporated in the management system. Measures and investments to support and ensure achieving the safety targets are regularly set in the Annual Business and Safety plan including also the Long Term safety investments (5 year plan). Continuous monitoring of achieving the targets and levels set in the National Aviation Safety Program (FASP) for the ANS part. Maintaining and if necessary found also developing the existing comprehensive safety organization. System investments optimizing airspace and resource management to improve safety and cost-efficient dynamic cross-border service provision. Close co-operation with the major airport operator in order to support RWY safety.

*\* 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	3,38 %	3,37 %	3,36 %	3,35 %	3,34 %

	2025	2026	2027	2028	2029
National targets	Target 3,38 %	Target 3,37 %	Target 3,36 %	Target 3,35 %	Target 3,34 %

##### b) Justifications for the local environment performance targets

N/A. Targets in line with the national reference values.

*\* Refer to Annex P, if necessary.*

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

Finland has established a Free Route Airspace (FRA) together with NEFAB + DK-SE FAB states. This allows airlines to use optimal routes in the Finnish airspace, which might not always be the great circle route. Airlines overflying Finnish airspace may be re-routed due to airspace restrictions, weather or other factors, which may lead to longer track distance compared to the great circle.

*\* Refer to Annex P, if necessary.*

## SECTION 3.3: CAPACITY KPA

---

### 3.3 - Capacity targets

#### [3.3.1 - Capacity KPI #1: En route ATFM delay per flight](#)

- a) National capacity performance targets
- b) Justifications for the local en route capacity performance targets
- c) Main measures put in place to achieve the local en route capacity performance targets

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

- a) National capacity performance targets
- b) Justifications for the local terminal capacity performance targets, including contribution to the improvement of the European ATM network performance
- c) Main measures put in place to achieve the local terminal capacity performance targets

#### [3.3.3 - ATCO planning](#)

- a) ATCOs in the scope of the performance plan
- b) ATCO planning at ACC level
- c) ATCO training

### Annexes of relevance to this section

ANNEX Q. JUSTIFICATIONS FOR THE LOCAL CAPACITY TARGETS

### 3.3 - Capacity targets

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

---

##### a) National capacity performance targets

	2025	2026	2027	2028	2029
National reference values	0,05	0,04	0,03	0,02	0,02
	2025	2026	2027	2028	2029
	Target	Target	Target	Target	Target
National targets	0,05	0,04	0,03	0,02	0,02

##### b) Justifications for the local en route capacity performance targets

N/A. Targets in line with the national reference values.

*\* Refer to Annex Q, if necessary.*

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

Historical performance of Fintraffic ANS has been very good on en-route, and there has not been en-route ATFM delays in recent years. Fintraffic ANS is expected to reach these targets.

Fintraffic ANS plans to implement and modify RADs / Dynamic RADs with co-operation with ESAA and EANS to meet the peak traffic demands and for better management of the changes in usability of airspace due to national or international MIL activities especially during Christmas traffic.

*\* 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
<b>National targets</b>	0,14	0,14	0,14	0,14	0,14
Additional comments					
<b>Airport level</b>	<b>EFHK-Helsinki</b>	0,14	0,14	0,14	0,14
	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

The Finnish NSA has made thorough analysis on the terminal capacity, and especially delays caused by weather.

Weather causes seem to have a growing trend, which makes it challenging to set a target value for ATFM arrival delay. The growing trend in delays caused by weather is an indication that challenging weather conditions seem to increase. However, it is difficult to forecast the future weather conditions.

As the traffic dropped significantly due to COVID-pandemic in 2020 and due to shifts in traffic after the start of the war in Ukraine in 2022, the weather delays have dropped in RP3.

It is difficult to estimate the effect of the slow traffic recovery to the delays caused by weather.

Due to the forecasted slow traffic recovery, it is estimated that the weather delays will not go above the delays of RP2. Therefore, the basis of the RP4 capacity targets for terminal is based on the RP3 weather delay average, which is 0,13 min/ft.

In addition to that, other causes have been taken into account. Since 2014 delay causes related to ATC capacity, ATC routing, ATC staffing, ATC equipment, airspace management and special events have been very low. The average delay for these causes is below 0,01 min/flight and the highest has been below 0,02 min/flight.

This results in the overall national target for terminal ANS ATFM delay being 0,14 min/ft.

*\* Refer to Annex Q, if necessary.*

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

Capacity during low visibility procedures;

1. optimizing capacity for single arriving runway depending on weather criteria;
  - 1.1. Aircrafts are to make CATII/III approaches due to low cloud, RVR at least 550m,
    - 1.1.1. ATC is going to lower the interval of arrivals from 150s to 130s as per runway occupancy time in such conditions allows it. Capacity increase in such LVP conditions 15%
  2. will apply a study and safety assesment to enable simultaneous arrivals on parallel runways, considering that risk level of the traffic crossing active runway, in such conditions doesn't meet unacceptable levels. Capacity increase appr. 66%.

Evaluate and implement new enhanced process putting in traffic regulations due to CB-cloud predictions based on available data. This will result in smaller and more precise regulations on traffic.

*\* Refer to Annex Q, if necessary.*

### 3.3.3 - ATCO planning and training

#### Fintraffic ANS

##### 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	40	39	39	43	44	46	48
	APP	48	49	50	51	51	53	53
	TWR	27	28	28	29	29	30	30
Number of ATCOs in OPS (year-end FTEs) allocated to the en route cost base(s)		80	81	82	86	87	90	93
Number of ATCO on other duties (year-end FTEs) employed by the ANSP		16	16	16	16	16	16	16

##### b) ATCO planning at ACC level

	Actual	Forecast	Planned				
	2023	2024	2025	2026	2027	2028	2029
<b>Tampere (EFIN ACC)</b>							
Number of additional ATCOs in OPS planned to start working in the OPS room (FTEs)	0	0	3	5	3	2	4
Number of ATCOs in OPS planned to stop working in the OPS room (FTEs)	3	1	3	1	2	0	2
Number of ATCOs in OPS planned to be operational at year-end (FTEs)	40	39	39	43	44	46	48

#### Additional comments

Area control centre in Finland is ATCC Finland (instead of Tampere).

##### 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.		10	10	10	10	10	10	10
Number of trainees expected to complete the training program(s) during the year based on statistical estimates.		10	10	10	10	10	10	10
Number ATCO trainees at year end.		20	20	20	20	20	20	20

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 ab-initio training in Finland is covered by state funding. The numbers mentioned above are the amount of ab-initio students, who are not employed by Fintraffic ANS during the training period.

All ab-initio students receive ADI, APS, APP and ACS ratings and conduct also unit training phase, meaning they all graduate with an ATCO license. After completing the state funded training program the newly qualified ATCOs will apply for the possible vacancies within Fintraffic or other ANSPs.

The failure rate during ab-initio training is very low, less than 10 percent.

## 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 - Finland

##### 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	2029D vs. 2024B
	2019 B	2024 B	2025 D	2026 D	2027 D	2028 D	2029 D	(CAGR)	(CAGR)
Total en route costs in nominal terms (in national currency)	43 732 091	47 623 396	51 824 293	55 880 486	59 228 783	61 276 181	65 065 593	4,5%	6,4%
<b>Total en route costs in real terms (in national currency at 2022 prices)</b>	<b>47 279 753</b>	<b>45 595 357</b>	<b>48 891 390</b>	<b>51 932 733</b>	<b>54 313 909</b>	<b>55 302 992</b>	<b>57 849 672</b>	2,3%	4,9%
Total en route costs in real terms (in EUR2022) <sup>1</sup>	47 279 753	45 595 357	48 891 390	51 932 733	54 313 909	55 302 992	57 849 672	2,3%	4,9%
YoY variation				6,2%	4,6%	1,8%	4,6%		
Total en route Service Units (TSU)	1 010 679	764 000	811 000	828 000	845 000	865 000	881 000	-1,5%	2,9%
YoY variation				2,1%	2,1%	2,4%	1,8%		
<b>Real en route unit costs (in national currency at 2022 prices)</b>	<b>46,78</b>	<b>59,68</b>	<b>60,29</b>	<b>62,72</b>	<b>64,28</b>	<b>63,93</b>	<b>65,66</b>	3,8%	1,9%
Real en route unit costs (in EUR2022) <sup>1</sup>	46,78	59,68	60,29	62,72	64,28	63,93	65,66	3,8%	1,9%
YoY variation				4,0%	2,5%	-0,5%	2,7%		

National currency	EUR
<sup>1</sup> Average exchange rate 2022 (1 EUR=)	1,00
Forecast inflation index 2024 - Base 100 in 2022	105,56

##### 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	Forecast 2024	2019 Baseline	2024 Baseline
	2019 B	2024 B	2019 A	2024 F	adjustments	adjustments
Total en route costs in nominal terms (in national currency)	43 732 091	47 623 396	42 772 708	46 455 995	959 383	1 167 401
<b>Total en route costs in real terms (in national currency at 2022 prices)</b>	<b>47 279 753</b>	<b>45 595 357</b>	<b>46 246 122</b>	<b>44 478 494</b>	<b>1 033 631</b>	<b>1 116 863</b>
Total en route costs in real terms (in EUR2022) <sup>1</sup>	47 279 753	45 595 357	46 246 122	44 478 494	1 033 631	1 116 863
Total en route Service Units (TSU)	1 010 679	764 000	1 010 679	764 000	0	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	7
-----------------------	---

Adjustment #1	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
Adjustment on staff costs	Fintraffic ANS	ANSP	Staff	-143 138	-157 293	-157 293
Description and justification of the adjustment						
There were two findings in the baseline value cost verification which influenced the enroute cost base in staff costs;						
1) Mistake in the training cost calculations						

Adjustment #2	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
Adjustment on other operating costs	Fintraffic ANS	ANSP	Other operating	-722 561	-794 015	-794 015
Description and justification of the adjustment						
There were three findings in the baseline value cost verification which influenced the enroute cost base in other operating costs;						
1) Some of the costs which were already reported in the NSA costs were also reported in the ANSP costs						

Adjustment #3	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
MET observations costs	FMI	MET	Staff	638 296	701 417	701 417
Description and justification of the adjustment						
Public funding for MET observations costs is ceased starting from the year 2025 and thus these costs are included in RP4 determined MET costs. Adjustments to the baseline value are calculated to be comparable to the determined observations costs in RP4.						

Adjustment #4	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
MET observations costs	FMI	MET	Other operating	957 444	1 052 126	1 052 126
Description and justification of the adjustment						
See adjustment #3						

Adjustment #5	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
MET observations costs	FMI	MET	Depreciation	202 500	202 500	202 500
Description and justification of the adjustment						
See adjustment #3						

Adjustment #6	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
MET observations costs	FMI	MET	Cost of capital	6 075	6 075	6 075
Description and justification of the adjustment						
See adjustment #3						

Adjustment #7	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
Finland's share for the SES-area space weather costs	FMI	MET	Exceptional items	20 767	22 821	22 821
Description and justification of the adjustment						
Calculated based on the 2025 value which is included in the MET exceptional items.						

<b>Total adjustments to the 2019 baseline value for the determined costs</b>				<b>Costs nominal NC</b>	<b>Costs real NC</b>	<b>Costs EUR2022</b>
				959 383	1 033 631	1 033 631

### 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	1 010 679	0,00 %	Other	1 010 679	-

Other adjustment to the 2019 service units No

**Total adjustments to the 2019 service units** -

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

Number of adjustments 5

Adjustment #1	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
MET observations costs	FMI	MET	Staff	375 224	355 446	355 446
Description and justification of the adjustment						

Public funding for MET observations costs is ceased starting from the year 2025 and thus these costs are included in RP4 determined MET costs. Adjustments to the baseline value are calculated to be comparable to the determined observations costs in RP4.

Adjustment #2	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
MET observations costs	FMI	MET	Other operating	562 835	533 169	533 169
Description and justification of the adjustment						
See adjustment #1						

Adjustment #3	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
MET observations costs	FMI	MET	Depreciation	202 500	202 500	202 500
Description and justification of the adjustment						
See adjustment #1						

Adjustment #4	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
MET observations costs	FMI	MET	Cost of capital	6 075	6 075	6 075
Description and justification of the adjustment						
See adjustment #1						

Adjustment #5	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
Finland's share for the SES-area space weather costs	FMI	MET	Exceptional items	20 767	19 672	19 672
Description and justification of the adjustment						
Calculated based on the 2025 value which is included in the MET exceptional items.						

Total adjustments to the 2024 baseline value for the determined costs	Costs nominal NC	Costs real NC	Costs EUR2022
	1 167 401	1 116 863	1 116 863

**c.4) Adjustments to the 2024 service units**

Other adjustment to the 2024 service units	No
--	----

**d) Justification of the consistency of the local en route cost-efficiency performance targets with the Union-wide targets**

Traffic in Finland has declined drastically due to the closure of Russian airspace that achieving improvements in unit cost evolution for RP4 is not realistic. Certain service level has to be maintained even for the lower traffic level and targets aiming for reduction of unit costs are not feasible in this situation. The traffic forecasts in Finland differ significantly from the rest of Europe and the traffic situation and evolution is not comparable to most of the European countries.

\* 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	No
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**

Fintraffic ANS is not able to reach EU-level cost-efficiency targets in RP4 due to difficult operational environment and sanctions related to the use of Russian airspace. Operations in Finnish airspace have increased more than service units due to increase of Kaliningrad flights. These flights have also increased complexity in our airspace. However, despite these external factors and difficult environment Fintraffic ANS is optimizing FTE-development to meet the operational needs, enhance project management, cyber security and digital services. FINEST co-operation (Fintraffic ANS and Estonian ANS) including dynamic cross-border service provision, enables joint procurement, optimization of resource management and infrastructure. Fintraffic ANS has taken into account the needs of customers and EU-regulation in RP4 investment plan.

See Annex R RP4 Fintraffic Cost containment measures.

*\* 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
--	-----

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

#### Terminal Charging Zone #1 - Finland - 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)	18 896 599	20 023 266	21 218 585	22 032 109	22 901 089	24 447 206	5,3%
<b>Total terminal costs in real terms (in national currency at 2022 prices)</b>	<b>17 930 208</b>	<b>18 652 552</b>	<b>19 395 105</b>	<b>19 757 563</b>	<b>20 153 566</b>	<b>21 168 967</b>	3,4%
Total terminal costs in real terms (in EUR2022) <sup>1</sup>	17 930 208	18 652 552	19 395 105	19 757 563	20 153 566	21 168 967	3,4%
YoY variation			4,0%	1,9%	2,0%	5,0%	
Total terminal Service Units (TNSU)	97 000	104 000	107 000	110 000	113 000	115 000	3,5%
YoY variation			2,9%	2,8%	2,7%	1,8%	
<b>Real terminal unit costs (in national currency at 2022 prices)</b>	<b>184,85</b>	<b>179,35</b>	<b>181,26</b>	<b>179,61</b>	<b>178,35</b>	<b>184,08</b>	-0,1%
Real terminal unit costs (in EUR2022) <sup>1</sup>	184,85	179,35	181,26	179,61	178,35	184,08	-0,1%
YoY variation			1,1%	-0,9%	-0,7%	3,2%	

National currency	EUR
1 Average exchange rate 2022 (1 EUR=)	1,00
Forecast inflation index 2024 - Base 100 in 2022	105,56

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

Terminal charging zone Name of the CZ	Baseline 2024	Forecast 2024	2024 Baseline adjustments
	2024 B	2024 F	
Total terminal costs in nominal terms (in national currency)	18 896 599	18 323 282	573 317
<b>Total terminal costs in real terms (in national currency at 2022 prices)</b>	<b>17 930 208</b>	<b>17 381 773</b>	<b>548 435</b>
Total terminal costs in real terms (in EUR2022) <sup>1</sup>	17 930 208	17 381 773	548 435
Total terminal Service Units (TNSU)	97 000	97 000	0

c) Detailed justifications for the adjustments to the baseline values

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

Number of adjustments	4
-----------------------	---

Adjustment #1	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
MET observations costs	FMI	MET	Staff	187 612	177 723	177 723
Description and justification of the adjustment						
Public funding for MET observations costs is ceased starting from the year 2025 and thus these costs are included in RP4 determined MET costs. Adjustments to the baseline value are calculated to be comparable to the determined observations costs in RP4.						

Adjustment #2	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
MET observations costs	FMI	MET	Other operating	281 418	266 585	266 585
Description and justification of the adjustment						
See adjustment #1						

Adjustment #3	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
MET observations costs	FMI	MET	Depreciation	101 250	101 250	101 250
Description and justification of the adjustment						
See adjustment #1						

Adjustment #4	Entity name	Entity type	Nature	Costs nominal NC	Costs real NC	Costs EUR2022
MET observations costs	FMI	MET	Other operating	3 038	2 877	2 877
Description and justification of the adjustment						
See adjustment #1						

Total adjustments to the 2024 baseline value for the determined costs	Costs nominal NC	Costs real NC	Costs EUR2022
	573 317	548 435	548 435

c.2) Adjustments to the 2024 service units

Adjustment to the 2024 service units	No
--------------------------------------	----

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

Fintraffic ANS is not able to reach EU-level cost-efficiency targets in RP4 due to difficult operational environment and sanctions related to the use of Russian airspace. Operations in Finnish airspace have increased more than service units due to increase of Kaliningrad flights. These flights have also increased complexity in our airspace. However, despite these external factors and difficult environment Fintraffic ANS is optimizing FTE-development to meet the operational needs, enhance project management, cyber security and digital services. FINEST co-operation (Fintraffic ANS and Estonian ANS) including dynamic cross-border service provision, enables joint procurement, optimization of resource management and infrastructure. Fintraffic ANS has taken into account the needs of customers and EU-regulation in RP4 investment plan.

\* Refer to Annex R, if necessary.

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

Fintraffic ANS is not able to improve cost-efficiency in RP4 due to difficult operational environment and sanctions related to the use of Russian airspace. Kaliningrad flights have increased the complexity of traffic and workload in approach control service in Helsinki.

See Annex R RP4 Fintraffic Cost containment measures.

*\* 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
---	-----

### 3.4.3 - Cost allocation ATSP/CNSP - Fintraffic ANS

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	Staff costs of ATCO's. Staff costs and other operating cost of technical ANS related to ATM. Depreciations and cost of capital of ATM investments. Costs of other centralized services (administration etc)
Communication	Yes	Staff costs and other operating cost of technical ANS related to COM. Depreciations and cost of capital of COM investments.
Navigation	Yes	Staff costs and other operating cost of technical ANS related to NAV. Depreciations and cost of capital of NAV investments.
Surveillance	Yes	Staff costs and other operating cost of technical ANS related to SUR. Depreciations and cost of capital of SUR investments.
Search and rescue	Yes	Costs of aeronautical rescue coordination centre
Aeronautical Information	Yes	Costs of AIS unit and flight planning center allocated to en route service.
Meteorological services	No	MET service given by FMI
Services to OAT	No	Services to OAT are deducted from the cost base in Other Income
Cross-border ATS	No	No cross-border services given by Fintraffic

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.

Most of the costs are allocated to service according to above mentioned ICAO-document when bills are registered to the accounting system. If information is not available, it has been estimated.

#### 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	43 736	47 387	50 627	52 655	56 432
Determined costs for terminal charging zone(s) in the scope of the performance plan	18 030	19 082	19 862	20 707	22 259
Forecasted costs for terminal services at airports outside the scope of the performance plan	17 051	17 460	18 567	21 370	22 580

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 and other operational costs are allocated to different services by cost centers. Investment costs are allocated by projects. Each cost center as well as each investment project has its own allocation keys to each service. The services for cost allocation are en route, EFHK terminal and the airports outside of the scope of the performance plan. In addition, the commercial part of business is separated in the calculations.

#### 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
Total determined costs for approach services	10 401	11 122	11 592	12 461	13 460
Determined costs for approach services allocated to the en route charging zone(s)	8 988	9 593	9 999	1 078	11 711
Determined costs for approach services allocated to the terminal charging zone(s) within the scope of the performance plan	<b>1 413</b>	<b>1 529</b>	<b>1 593</b>	<b>1 684</b>	<b>1 750</b>

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

APP and TWR service costs are posted to the same cost centers. In most cases the ATCOs work for both services.

There is a separate approach control in total of eight ATC units which deliver also service to en route.

It's decided that part of the APP costs of five ATC units (EFHK, EFRO, EFKU, EFTP and EFJY) are allocated to en route cost base. The allocation methodology has remained unchanged since RP1.

It's been estimated that TWR service distance is approximately 0-5 km and APP service distance is approximately 5-70 km. APP service distance is between 50-100 km in EFHK. The APP service distances in airports with radar approach service (EFRO, EFKU, EFTP and EFJY) varies approximately between 40 to 95 km. These APP units may reserve airspace above approach service in order to provide en route service.

Fintraffic ANS doesn't have working time monitoring to divide the working hours of ATCOs between TWR and APP or the service given from APP to en route. 40 % of APP+TWR service cost allocation to en route service is an estimation and it's based on the APP control ATCO's work description.

**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)	Yes
If yes, description of the nature of the services provided and the geographical scope	
ANS services in small airports in Finland	
If yes, description of the arrangements for the financing of the services provided	
Airport operator Finavia pays so called ANS charge for the services. Commercial contract with other airport owners.	
Services to OAT	Yes
If yes, description of the arrangements for the financing of the services provided	
Financed by Finavia ANS charge. Fintraffic bills normal enroute charge.	
Other ANS	No
Non ANS	No

**e) 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.	

**f) Verification by the NSA**

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

### 3.4.4 - Cost allocation METSP - FMI

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
The provided services include aeronautical meteorological services described in (EU) 2017/373 part-MET (373) and the national regulation ANS M1-1 for all civil aviation in Helsinki FIR. Services take into account evolving airspace use, Northern European climate and weather conditions and operating in winter conditions. In addition, national services defined by the State council decision (VN/7258/2019) are produced jointly in cooperation between Nordic States.
The services include: <ul style="list-style-type: none"> <li>• METAR (373)</li> <li>• TAF (373)</li> <li>• SIGMET (373)</li> <li>• TREND (373)</li> <li>• Aerodrome Warning (373)</li> <li>• Special air-report (ICAO Annex 3)</li> <li>• Nordic Significant Weather Chart (national)</li> <li>• Low Level Forecast, LLF (national)</li> <li>• WXREP (national)</li> <li>• EFHK Warning (national)</li> </ul>
Services also include the development and deployment of System-wide Information Services in accordance with (EU) 2021/116 (Common Project One; CP1) and ATM Master plan. <ul style="list-style-type: none"> <li>• Winter Weather Information Service</li> <li>• Aerodrome Forecast Information Service</li> <li>• Aerodrome Observation Information Service</li> <li>• Lightning Hazard Information Service</li> </ul>
FMI has included the global Space Weather Information Service as it is the leading institute of PECASUS, the designated global space weather center according to ICAO Annex 3 SARPs

#### 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	3 836	4 120	4 188	4 234	4 217
Determined costs for terminal charging zone(s) in the scope of the performance plan	1 908	2 050	2 084	2 107	2 098
Forecasted costs for terminal services at airports outside the scope of the performance plan	<b>1 908</b>	<b>2 050</b>	<b>2 084</b>	<b>2 107</b>	<b>2 098</b>

#### 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')
The cost accounting system of the Finnish Meteorological Institute (FMI) follows the principles of ABC (Activity-Based Costing). Method was implemented in 1995 and thus is the same principle as in RP3.
The costs of FMI are divided into two categories, direct costs and costs supporting meteorological facilities (indirect costs or MET core costs). Direct costs are assigned directly to the project in question. This assignment happens already in the book-keeping system of FMI. Direct costs can be labor costs and/or operational costs. The amount of labor costs consist of actual civil aviation labor input, working hours, which are recorded monthly to the working hour registry KIEKU.
There are two types of core cost items at FMI: <ol style="list-style-type: none"> <li>1. Costs of support services (general IT-infrastructure services, general training, financial and personnel administration etc.)</li> <li>2. Unit-level costs (general management, public relations and internal communications, premises, electricity &amp; water, office supplies and other unit-level costs)</li> </ol>
The allocation of indirect costs/core costs to aviation has been made by using percentages. The more the unit is producing aviation services the higher the percentage is. The percentage is related to direct working hours. MET core costs are costs of infrastructure and supporting services, also met-institutes head office costs like International organizations member fees (EUMETSAT and WMO) are included in core costs. Core costs include both fixed and variable costs. Core costs can be labour and/or operational costs.

**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	Finland	2 026	2 049	2 096	2 101	2 094
Terminal charging zone 1	Finland - TCZ	1 006	1 019	1 042	1 044	1 040
<b>Total forecasted costs for the concerned entity</b>		<b>3 032</b>	<b>3 068</b>	<b>3 138</b>	<b>3 145</b>	<b>3 134</b>

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).

Direct costs are assigned directly to the project in question. This assignment happens already in the book-keeping system of FMI. Direct costs can be labor costs and/or operational costs. The amount of labor costs consist of actual civil aviation labor input, working hours, which are recorded monthly to the working hour registry KIEKU. See also answer in question c. Cost allocation principles are based on ICAO Doc 9161 and are following: en route 50 % and terminal (Helsinki Airport) 25% and terminal (other airports) 25 % which is not within the performance plan, excluding space weather costs (100% en-route).

**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	Finland	1 742	1 907	1 865	1 869	1 852
Terminal charging zone 1	Finland - TCZ	868	950	929	930	922
<b>Total forecasted costs for the concerned entity</b>		<b>2 609</b>	<b>2 857</b>	<b>2 794</b>	<b>2 800</b>	<b>2 774</b>

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.

The allocation of indirect costs/core costs to aviation has been made by using percentages. The more the unit is producing aviation services the higher the percentage is. The percentage is related to direct working hours. MET core costs are costs of infrastructure and supporting services, also met-institutes head office costs like International organizations member fees (EUMETSAT and WMO) are included in core costs. Core costs include both fixed and variable costs. Core costs can be labour and/or operational costs. Cost allocation principles are based on ICAO Doc 9161 and are following: en route 50 % and terminal (Helsinki Airport) 25% and terminal (other airports) 25 % which is not within the performance plan, excluding space weather costs (100% en-route).

**f) Changes in cost allocation methodology**

Are there changes in the cost allocation criteria with respect to the previous reference period? If yes, please provide the description and justification of the changes and impact(s) on the determined costs and/or baseline.	No

**g) Verification by the NSA**

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

### 3.4.5 - Cost allocation - NSA

Complementary information may be provided in ANNEX M

#### a) Supervision costs

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

All the NSA costs are allocated to supervision costs. NSA costs include Traficom's oversight charges to the main ANSP. The oversight consists of the following services: ATS, ASM, ATFM, FPD, CNS and AIS. The charges are based on Act on Criteria for Charges Payable to the State and the target is that they are cost-reflective.

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

NSA costs in en route cost base consist ACC unit oversight costs and in addition 40 % of the oversight costs from five airports which have APP control. NSA costs in terminal cost base consist 60 % of the TAS EFHK oversight costs (40 % of the costs are allocated to en route).

#### 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

n/a

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					
Determined costs for terminal charging zone(s) in the scope of the performance plan					
Forecasted search and rescue costs outside the scope of the performance plan					

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

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

#### c) Changes in cost allocation methodology

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

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

No

#### d) Verification by the NSA

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

Yes

### 3.4.6 - Determined costs assumptions - Fintraffic ANS

#### 3.4.6.1 - Operating costs

##### a) Staff costs

Number of entries	4
-------------------	---

#	Staff costs building blocks (in nominal terms in '000 national currency)	Description of the composition of each item	Charging zones	Actual	Forecast	Determined				
				2023	2024	2025	2026	2027	2028	2029
1	Wages and Salaries		En-route charging zones	16 784	18 332	19 898	21 736	22 503	23 659	24 782
			Terminal charging zones	7 387	8 098	8 674	9 176	9 426	9 883	10 207
2	Social Security Expenses		En-route charging zones	256	220	345	377	390	410	430
			Terminal charging zones	113	97	150	159	163	171	177
3	Pension expenses		En-route charging zones	2 811	3 076	3 284	3 588	3 714	3 905	4 090
			Terminal charging zones	1 237	1 359	1 432	1 515	1 556	1 631	1 685
4	Other staff expenses		En-route charging zones	300	209	174	190	196	206	216
			Terminal charging zones	132	92	76	80	82	86	89
<b>Total staff costs</b>			<b>En-route charging zones</b>	<b>20 151</b>	<b>21 838</b>	<b>23 701</b>	<b>25 890</b>	<b>26 804</b>	<b>28 180</b>	<b>29 518</b>
			<b>Terminal charging zones</b>	<b>8 870</b>	<b>9 646</b>	<b>10 332</b>	<b>10 930</b>	<b>11 228</b>	<b>11 772</b>	<b>12 157</b>

Accounting provisions included in total staff costs	No accounting provisions identified	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 pension costs and expected evolution over Reference Period 4 (for Main ANSP please refer to tab 3.4.7)	See 3.4.7.2	En-route charging zones	2 811	3 076	3 284	3 588	3 714	3 905	4 090
		Terminal charging zones	1 237	1 359	1 432	1 515	1 556	1 631	1 685

Description of the main factors explaining the planned variations of staff costs over the reference period									
In Fintraffic ANS (including all services) staff costs are expected to increase yearly 4,9% on average in RP4. 1,9% of the increase can be explained by FTE increase and 2,9% by wage increases. Main factors explaining FTE increase are the following									
1. Increase in the number of ATCOs in ACC and in ATC Helsinki due to increasing and more complex traffic									
2. Establishment of FIS-unit to enable FINEST cross-border service									
3. Increase of specialists to enable development of cyber security, project management and digital services.									

**b) Other operating costs**

Number of entries	6
-------------------	---

#	Other operating costs building blocks (in nominal terms in '000 national currency)	Description of the composition of each item	Charging zones	Actual	Forecast	Determined				
				2023	2024	2025	2026	2027	2028	2029
1	ATCC	ACC, ATC EFHK, ARCC, AMC, Flight planning, FIS	En-route charging zones	3 327	3 938	3 703	4 029	4 161	4 309	4 482
			Terminal charging zones	2 690	2 614	2 652	2 985	3 183	3 337	3 528
2	Administration	Finance, ITC, Communications, Marketing, Staff	En-route charging zones	4 657	4 372	4 572	4 608	4 673	4 740	4 808
			Terminal charging zones	2 164	2 032	2 125	2 141	2 171	2 202	2 234
3	Training	ATS, ATCO basic, technical	En-route charging zones	108	115	101	104	108	111	115
			Terminal charging zones	54	57	51	52	54	56	57
4	Network	APP costs allocated to ENR	En-route charging zones	930	949	1 190	1 221	1 258	1 557	2 106
			Terminal charging zones	0	0	0	0	0	0	0
5	Technology	System management and development, maintenance	En-route charging zones	3 049	3 384	4 006	4 133	4 594	4 711	5 545
			Terminal charging zones	1 805	2 004	2 113	2 182	2 440	2 503	2 969
6	Development	Development and quality, AIS, ASM	En-route charging zones	279	428	456	466	475	485	495
			Terminal charging zones	146	210	248	253	258	263	268
<b>Total other operating costs</b>			<b>En-route charging zones</b>	<b>12 351</b>	<b>13 187</b>	<b>14 028</b>	<b>14 560</b>	<b>15 270</b>	<b>15 913</b>	<b>17 550</b>
			<b>Terminal charging zones</b>	<b>6 859</b>	<b>6 917</b>	<b>7 188</b>	<b>7 612</b>	<b>8 106</b>	<b>8 360</b>	<b>9 056</b>

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

Costs for ground-ground communication services	PENS	En-route charging zones	56	48	55	55	65	66	68
		Terminal charging zones	0	0	0	0	0	0	0
Costs for air-ground communication services via terrestrial link	ENR: CPDLC and ATIS datalink service. TN: DigiATIS	En-route charging zones	289	289	298	310	322	335	348
		Terminal charging zones	6	6	6	6	6	7	7
Costs for air-ground communications services via satellite link		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 operating costs over the reference period

In Fintraffic ANS level general inflation is expected to be 2%. Following costs are expected to increase faster than general inflation rate: leasing costs of ANS investments at Finavia airports, payments to airport operator Finavia (based on number of operations), payments to Fintraffic group for services related to ICT, HR, and Finance, maintenance contracts of ANS equipment, renewal of technical vehicles and training costs. There is risk that credit losses will increase in enroute service of Kaliningrad flights due to sanctions.

**c) Exceptional items**

Number of entries	0
-------------------	---

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

**d) Accounting provisions**

Number of entries	0
-------------------	---

#	List of provisions included in the	Description of the composition of	Charging zones	Value of the	Forecast	Determined
---	------------------------------------	-----------------------------------	----------------	--------------	----------	------------

**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
See Annex T.
NSA is of the opinion that Option 1 as calculated by PRB is well justified and takes into account the relevant risks. See "Study on cost of capital, Methodology review and update", June 2024. The same WACC has been used for both enroute and terminal services. The sense check has been calculated combining enroute and terminal cost bases and asset bases.
NSA is of the opinion that the risk incurred by the ANSP is primarily expected to stem from the maximum risk exposure to traffic (4,4%) and not exposed to any justifiable additional risk.

Cost of capital assumptions	Description of each item
NBV fixed assets	Yearly average value of the completed and unfinished fixed assets
Adjustments total assets	No adjustments
Net current assets	Sales receivables deducted with accounts payable
Cost of capital %	Option 1: Average RP4 4,85 %
Return on equity	Option 1: Average RP4 4,85 %
Average interest on debts	Option 1: 2,3 % (genuine 0 %)
Share of financing through equity	Option 1: 74,8 % (genuine 100 %)

**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)
Fintraffic ANS does not have any enroute income related to VFR-traffic. In reporting tables VFR costs are estimated to be 2000€ yearly. This is based on specialist assessment. At Helsinki-Vantaa airport there is the same TN charge formula for VFR flights as for IFR flights. TN charges of VFR flights are charged by Fintraffic ANS.

**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
During the cost verification the ANSP changed/adjusted
- some of the allocations keys (staff, investments)
- some of the staff planning if the number of planned staff could not be justified
- the general inflation rates for other operational costs to match the IMF inflation forecast.

### 3.4.6 - Determined costs assumptions - FMI

#### 3.4.6.1 - Operating costs

##### a) Staff costs

Number of entries	4
-------------------	---

#	Staff costs building blocks (in nominal terms in '000 national currency)	Description of the composition of each item	Charging zones	Actual	Forecast	Determined				
				2023	2024	2025	2026	2027	2028	2029
1	Wages and Salaries	Wages and salaries are based on the 2023 and 2024 baseline taking into account known collective labor agreement changes in wages. In reality collective labor agreement may vary over RP4.	En-route charging zones	1 603	1 579	2 227	2 331	2 331	2 336	2 322
			Terminal charging zones	801	782	1 113	1 165	1 166	1 168	1 161
2	Social Security Expenses	The social security expenses cost has been evaluated to 1,53% throughout RP4. This is the based on the 2023 baseline, in reality these may vary year-to-year.	En-route charging zones	25	29	41	43	43	43	43
			Terminal charging zones	12	14	21	22	22	22	22
3	Pension expenses	The pension cost has been evaluated to 18,25% throughout RP4. This is the average of different pension categories at FMI. Actually the pension cost varies from year to year.	En-route charging zones	262	260	422	442	444	445	442
			Terminal charging zones	131	138	211	221	222	222	221
4	Other staff expenses	Accident insurance premiums based on the 2023 baseline. In reality these may vary year-to-year.	En-route charging zones	3	4	6	6	6	6	6
			Terminal charging zones	2	2	3	3	3	3	3
<b>Total staff costs</b>			<b>En-route charging zones</b>	<b>1 893</b>	<b>1 872</b>	<b>2 696</b>	<b>2 822</b>	<b>2 824</b>	<b>2 830</b>	<b>2 813</b>
			<b>Terminal charging zones</b>	<b>946</b>	<b>936</b>	<b>1 348</b>	<b>1 411</b>	<b>1 412</b>	<b>1 415</b>	<b>1 406</b>

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

Assumptions underlying the determined pension costs and expected evolution over Reference Period 4 (for Main ANSP please refer to tab 3.4.7)	En-route charging zones	263	260	422	442	444	445	442
	Terminal charging zones	131	138	211	221	222	222	221

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

The planned variations of staff costs are due to increases in wages and pension costs, increased need of manpower for number of changes (mainly regarding CP1 and ATM Master Plan deployment).

**b) Other operating costs**

Number of entries	2
-------------------	---

#	Other operating costs building blocks (in nominal terms in '000 national currency)	Description of the composition of each item	Charging zones	Actual	Forecast	Determined				
				2023	2024	2025	2026	2027	2028	2029
1	Aeronautical forecast and warning services		En-route charging zones	437	621	778	836	804	801	783
			Terminal charging zones	219	310	389	418	402	400	392
2	Aeronautical observations		En-route charging zones			273	278	313	318	329
			Terminal charging zones			136	139	156	159	164
<b>Total other operating costs</b>			<b>En-route charging zones</b>	<b>437</b>	<b>621</b>	<b>1 051</b>	<b>1 114</b>	<b>1 116</b>	<b>1 119</b>	<b>1 112</b>
			<b>Terminal charging zones</b>	<b>219</b>	<b>310</b>	<b>525</b>	<b>557</b>	<b>558</b>	<b>560</b>	<b>556</b>

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

Costs for ground-ground communication services	En-route charging zones								
	Terminal charging zones								
Costs for air-ground communication services via terrestrial link	En-route charging zones								
	Terminal charging zones								
Costs for air-ground communications services via satellite link	En-route charging zones								
	Terminal charging zones								

Description of the main factors explaining the planned variations of other operating costs over the reference period  
There are no major planned variations.

**c) Exceptional items**

Number of entries	1
-------------------	---

#	Exceptional items building blocks (in nominal terms in '000 national currency)	Description of the composition of each item	Charging zones	Actual	Forecast	Determined				
				2023	2024	2025	2026	2027	2028	2029
1	ICAO space weather information services		En-route charging zones	0	0	20	21	21	21	22
			Terminal charging zones	0	0	0	0	0	0	0
<b>Total exceptional items</b>			<b>En-route charging zones</b>	<b>0</b>	<b>0</b>	<b>20</b>	<b>21</b>	<b>21</b>	<b>21</b>	<b>22</b>
			<b>Terminal charging zones</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

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  
 Costs based on 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.

**d) Accounting provisions**                      Number of entries                      0

#	List of provisions included in the	Description of the composition of	Charging zones	Value of the	Forecast	Determined
---	------------------------------------	-----------------------------------	----------------	--------------	----------	------------

**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  
 Asset base includes only aviation observations assets. The Finnish State Treasury announces the nominal interest cost for use in state investment calculations and capital use evaluations for 2024, calculated based on 2023 data. The nominal interest rate is 3.0% (2024). FMI as a government entity cannot have a bank loan. There is no interest expence associated with the debt items.

Cost of capital assumptions	Description of each item
NBV fixed assets	Net Book Value= Initial Cost – Accumulated Depreciation – Losses
Adjustments total assets	No adjustments
Net current assets	N/A
Cost of capital %	The Finnish State Treasury nominal interest rate
Return on equity	The Finnish State Treasury nominal interest rate
Average interest on debts	N/A
Share of financing through equity	FMI as a government entity cannot have a bank loan.

**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 are negligible and are therefore excluded from RP4.

**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  
 Reported costs verified to match the internal accounting and cost allocations justifications examined. No findings for the cost verification.

### 3.4.7 - Pension assumptions

#### Fintraffic ANS

#### 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	3 284	3 588	3 714	3 905	4 090
Terminal activity	1 432	1 515	1 556	1 631	1 685
Other activities	1 863	1 696	1 778	1 860	1 882
<b>Total pension costs</b>	<b>6 579</b>	<b>6 798</b>	<b>7 048</b>	<b>7 397</b>	<b>7 657</b>

#### 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
--	----

All staff	2025D	2026D	2027D	2028D	2029D
Total pensionable payroll to which this scheme applies	39 698	42 388	43 842	45 833	47 614
Employer % contribution rate to this scheme	16,42 %	15,93 %	16,00 %	16,09 %	16,08 %
<b>Total pension costs in respect of this scheme</b>	<b>6 518</b>	<b>6 751</b>	<b>7 014</b>	<b>7 376</b>	<b>7 657</b>
Number of employees the employer contributes for in this scheme	402	418	418	423	426

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 statutory pension security in Finland consists of defined benefit earnings-related pension that accrues from work, as well as residence-based national pension and guarantee pension that ensure minimum security. In Finland, the earnings-related pension is a statutory benefit for the employee. The employer is liable to arrange pension insurance.

The employer arranges pension security for his employees from a pension provider of his own choosing. The employer can take out statutory pension insurance for the employees with a pension insurance company or with an industry-wide pension fund, or by establishing a company pension fund. State employers pay their contributions to the State Pension Fund.

Both the employer and the employee pay pension contributions based on the gross wage of the wage earner. The employer levies from the employee's wage/salary the employee's share of the contribution and pays it together with the employer's own contribution to the pension provider.

Contribution is mainly affected by the employer's size, which is evaluated on the basis of the total amount of wages and salaries paid by the employer.

Employers disburse pension contributions based on the earnings of their employees to their own pension providers, who use them to finance earnings-related pensions currently on their responsibility and, on the other hand, prepare for the payment of future pensions by funding payments.

Fintraffic ANS pension costs are covered by the Employees' Pensions Act (TyEL).

More information about the pension system in Finland:

<https://www.ilmarinen.fi/en/about-ilmarinen/pension-system-in-finland/>

<https://www.tyoelake.fi/en/what-are-pensions/>

There aren't any changes to be expected during RP4.

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

The level of statutory earnings-related contributions depends on the level on pension benefits, the currently valid funding and financing principles as well as investment profit from pension assets. Development of the national economy and the age structure of the population also affect the need for pension contributions.

The contribution rate and changes are set yearly by the State (TyEL and JuEL) and therefore are not under the control of the entity.

The yearly contribution rate forecast for RP4 is received from the pension insurance company Ilmarinen and the forecast is specifically calculated to Fintraffic ANS.

Fintraffic ANS has also additional pension for ATCOs. These costs are included in the determined staff costs but not in the uncontrollable pension costs.

For more information about Ilmarinen and how the TyEL contribution rate is determined:

<https://www.ilmarinen.fi/en/employer/determining-the-tyel-contribution/>

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 contribution rate and changes are set by the state and there is no means to mitigate this risk.

**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?	Select
--	--------

ATCOs transferred to new pension system in 2010	2025D	2026D	2027D	2028D	2029D
Total pensionable payroll to which this scheme applies	900	700	500	300	0
Employer % contribution rate to this scheme	6,8 %	6,8 %	6,8 %	6,8 %	6,8 %
<b>Total pension costs in respect of this scheme</b>	<b>62</b>	<b>48</b>	<b>34</b>	<b>21</b>	<b>0</b>
Number of employees the employer contributes for in this scheme	9	7	5	3	0

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 state decided to corporatize the state enterprise, CAA Finland, into a public limited company, Finavia plc, in 2010. This meant that the company Finavia plc was transferred from the state pension system to the private sector pension system. Because the terms in the private sector pension system are weaker than the state pension system, Finavia decided to obtain a voluntary pension scheme for those who had a valid job contract with Finavia, to compensate the weaker terms caused by the corporatization. Later, in 2017, the Air Navigation Services business area was corporatized out of Finavia Plc, into a separate state-owned company, and became Fintraffic ANS Ltd. Because of these circumstances, the voluntary pension scheme should be regarded as pension costs for Fintraffic ANS.

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

The share of this pension scheme will decrease during RP4.

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

This voluntary pension scheme cost is regarded to be outside of the cost exempt 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?	No
--	----

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

**Fintraffic ANS**

Select number of loans Select

**Interest rate assumptions for loans financing the provision of air navigation services  
(Amounts in nominal terms in '000 national currency)**

Other loans	2025D	2026D	2027D	2028D	2029D
Description					
Remaining balance					
Average weighted interest rate %	-	-	-	-	-
Interest amount					

Total loans	2025D	2026D	2027D	2028D	2029D
<b>Total remaining balance</b>	-	-	-	-	-
<b>Average weighted interest rate %</b>	-	-	-	-	-
<b>Interest amount</b>	-	-	-	-	-

**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?	No
---	----

### 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
--	----

#### 3.4.10.2 Restructuring costs planned for RP4

Restructuring costs foreseen for RP4?	No
---------------------------------------	----

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	0
---------------------------	---

## 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 change management process ensures that the safety remains at least at an acceptable level despite modifications or changes in the functional system. The reporting system and the risk based analysis and monitoring related to mitigation effectiveness ensures that signals of possible negative impact will be identified.

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 overall safety level of Fintraffic ANS has been very good in the recent years. It is expected that the performance plan will not have negative effect on safety, however, this need to be evaluated constantly by the NSA during the reference period.  
The change management process ensures that the safety remains at least at an acceptable level despite modifications or changes in the functional system. The reporting system and the risk based analysis and monitoring related to mitigation effectiveness ensures that signals of possible negative impact will be identified.  
No additional indicators used for monitoring other than those in the Regulation.

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.

The financial crisis caused by the pandemic and now due to the aggressive Russian invasion war against Ukraine that closed the FIR boundary, forces Fintraffic ANS to continuously monitor and adjust the investment programmes. The prioritization decisions done and planned are based on the risk management processes in place. The consequences of the decisions are regularly monitored from safety, service continuity and business perspectives. The reporting system and the risk based analysis and monitoring related to mitigation effectiveness ensures that signals of possible negative impact will be identified.

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?

Continuing the long-term resource planning, including the safety related activities, i.e. training, surveys, audits and publication of safety related use cases ensures that no adverse trade-offs it has been necessary to accept nor is it foreseen within the reference period.

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.

Audits are performed to according to regulation 2017/373 and ANSP:s meet all its requirements.  
The NSA has continued to monitor the ANSP's financial situation post- COVID-19 pandemic and the Russian invasion war, which closed the FIR boundary for the traditional overflights. This to ensure that the ANSP has sufficient funding to maintain the required safety level. NSA delivers the annual risk-profile for the company that gives additional information of the safety performance.

#### 3.6.2 - Interdependencies and trade-offs between capacity and environment

---

The key performance indicator for environment is measured on the en-route phase of the flight, and the en-route ATFM delay historical performance of ANSP has been very good in the recent years. In addition to the horizontal en-route flight efficiency the CDA/CDO performance is monitored frequently. Certain departure and arrival routes are adjusted based on environmental (e.g noise abatement) demands. The capacity is adjusted accordingly to ensure that no negative safety impact is met.

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

---

The relationship between capacity and cost-efficiency is a long-term one. Normally, required investments (e.g. recruitment and training) need to be initiated long before they are operational.

Since 2008 the en-route delays have been zero or very close to zero (with 2011 and 2014 being exceptions). It is and it has been in the interest of Fintraffic ANS to serve at this excellent level.

The costs for producing this quality of service has been taken into account in the cost base and the Fintraffic ANS has indicated that they have no (or minimal) additional costs in providing this level of capacity compared to target capacity and therefore NSA is not aware of any specific investments that is required to maintain the current level of capacity compared to the target capacity.

In TN service there have been delays and since 2013 practically all delays have been caused by the weather. Years 2015, 2018, 2019 and 2024 have been exceptions to this because of a runway and taxiway renovations (airport capacity).

According to Fintraffic ANS, in some situations (CAT operations) the delays could be lowered by investing in additional taxiway(s). Also in some slippery runway (or taxiway) conditions, it could be possible to increase capacity by investing to the prevention of these conditions. However, these investments are not directly under the control of Fintraffic ANS because those investment decisions are made by Finavia (airport operator) which is not regulated by the performance regulation (Finavia is not an air navigation service provider). These mentioned airport/aerodrome investments would not be part of the cost-base of the Fintraffic ANS.

### 3.6.4 - Other interdependencies and trade-offs

---

None

*Should additional space be needed for any of the items, please use Annex S.*

## 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 km<sup>2</sup>, 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)	0
--	---

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

Number of cross-border initiatives	1
------------------------------------	---

Initiative #1	
Name	FINEST co-operation between Fintraffic ANS and EANS (ANS provider in Estonia)
Description	Dynamic cross-border service provision
Expected performance benefits	<p>Full FRA environment provides savings in fuel for the stakeholders. Reduction on CO<sub>2</sub> emission. Cost savings for the ANSP's in the number of both operational and technical resources and future joint ATM investments.</p> <ul style="list-style-type: none"> <li>- The programme provides improved safety brought by the common system architecture</li> <li>- Enhancing cost efficiency brought by sharing of technical and operational resources, shared system procurement and maintenance costs</li> <li>- Increased capacity brought by dynamic cross-border sector configurations allowing traffic load and complexity sharing dynamically into several operational sectors.</li> <li>- Reduced environmental impacts when planned and operated trajectories can be optimised in Finnish/Estonian airspace (vertical and horizontal flight efficiency, shorter connection routes to the main airport Helsinki-Vantaa and less intervention from ATC to make CCO/CDO.)</li> </ul>
Additional comments	The project was introduced initially in RP3. Due to geopolitical situation and national security issues the approval for the project from MoDs have been delayed as additional concerns were raised. The dialogue with owners and MoDs is ongoing to define the way forward. For these reasons the timeline for the initiation of cross-border service provision is uncertain.

##### 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
With this initiative both parties would be in a position to respond to the future traffic growth with current or less resources required. Common airspace structure offers the customers to benefit from full FRA environment over state boundaries. The cost reduction for both the customers and ANSP's, improved safety provided by sector modelling and the environmental benefits are the main drivers.

#### 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
<b>CP1-AF1 - Extended AMAN and Integrated AMAN/DMAN in High-Density TMA</b>									
CP1-s-AF1.1 AMAN extended to en-route airspace	31.12.2024	31.12.2024	N/A for Helsinki Airport (investment required due to requirement for ESSA)		76290	73280	70270	67256	59123
CP1-s-AF1.2 AMAN/DMAN Integration	31.12.2027		N/A for Helsinki Airport						
<b>CP1-AF2 - Airport Integration and Throughput</b>									
CP1-s-AF2.1 DMAN synchronised with predeparture sequencing	31.12.2022		N/A for Helsinki Airport						
CP1-s-AF2.2.1 Initial airport operations plan (iAOP)	31.12.2023		N/A for Helsinki Airport						
CP1-s-AF2.2.2 Airport operations plan (AOP)	31.12.2027	31.12.2027	Extended AOP. Future leasing cost						
CP1-s-AF2.3 Airport safety nets	31.12.2025	31.12.2025	Electronic Flight Strip system, A-SMGCS system renewal, back-up equipment EFS Part of the costs for the 3 investments is linked to CP1 requirements (leasing costs)		355 009	580 516	550 901	521 286	491 671
<b>CP1-AF3 - Flexible Airspace Management and Free Route Airspace</b>									
CP1-s-AF3.1 Airspace management and advanced flexible use of airspace	31.12.2022	31.12.2023	ASM and A-FUA, Management of Predefined Airspace Configurations. Covers also row 17)		4 346 050	4 602 400	5 735 008	5 594 154	4 520 253
CP1-s-AF3.2 Free route airspace	31.12.2025	8.2.2023	Initial FRA, Enhanced Free Route Airspace Operations						
<b>CP1-AF4 - Network Collaborative Management</b>									
CP1-s-AF4.1 Enhanced short-term ATFCM measures	31.12.2022	Completed	Enhanced Short Term ATFCM Measures						
CP1-s-AF4.2 Collaborative NOP	31.12.2023	Completed	Interactive Rolling NOP Fintraffic ANS relies to NM system support & development and is using CHMI and NMP						

CP1-s-AF4.3 Automated support for traffic complexity assessment	31.12.2022	Completed	Automated Support for Traffic Complexity Assessment and Flight Planning Interfaces. Fintraffic ANS relies to NM system support &							
CP1-s-AF4.4 AOP/NOP integration	31.12.2027	N/A	AOP/NOP Integration Helsinki Airport not in CP1 applicability area for this objective.							
<b>CP1-AF5 - SWIM</b>										
CP1-s-AF5.1 Common infrastructure components	31.12.2024	31.12.2025-31.12.2029	Phased deployment. Complete deployment with Thales TopSky ATM system upgrade							
CP1-s-AF5.2 SWIM yellow profile technical infrastructure and specifications	31.12.2025	31.12.2029	Stakeholders' SWIM PKI and cybersecurity Included in Thales TopSky ATM system upgrade							
CP1-s-AF5.3 Aeronautical information exchange	31.12.2025	31.12.2029	Aeronautical Information Exchange, Stakeholders' SWIM PKI and cybersecurity, Meteorological Information Exchange Included in Thales TopSky ATM system	# A1 Contract negotiation on-going. Calculation based on estimated investment cost.	51 506	56 229	53 805	56 887	208 732	
CP1-s-AF5.4 Meteorological information exchange	31.12.2025	31.12.2029	Meteorological Information Exchange. Included in Thales TopSky ATM system upgrade	# A1 Contract negotiation on-going. Calculation based on estimated investment cost.	30 903	33 737	32 283	34 132	125 239	
CP1-s-AF5.5 Cooperative network information exchange	31.12.2025	31.12.2029	Cooperative Network Information Exchange. Included in Thales TopSky ATM system upgrade							
CP1-s-AF5.6 Flight information exchange (yellow profile)	31.12.2025	31.12.2029	Flight Information Exchange. Included in Thales TopSky ATM system upgrade	# A1 Contract negotiation on-going. Calculation based on estimated investment cost.	82 409	89 966	86 089	91 019	333 971	
<b>CP1-AF6 - Initial Trajectory Information Sharing</b>										
CP1-s-AF6.1 Initial air-ground trajectory information sharing	31.12.2027	31.12.2029	Initial Air-Ground Trajectory Information Sharing (Ground Domain). Included in Thales TopSky ATM system upgrade	# A1 Contract negotiation on-going. Calculation based on estimated investment cost.	30 345	33 264	69 649	71 325	267 500	
CP1-s-AF6.2 Network Manager trajectory information enhancement	31.12.2027	31.12.2029	Included in Thales TopSky ATM system upgrade							
CP1-s-AF6.3 Initial trajectory information sharing ground distribution	31.12.2027	31.12.2029	Initial Trajectory Information Sharing ground distribution. Included in Thales TopSky ATM system upgrade	# A1 Contract negotiation on-going. Calculation based on estimated investment cost.	22 759	24 948	52 237	53 494	200 625	
Total RP4 determined costs for common project related to the sub-functionalities across charging zones for the concerned entity					4 995 272	5 494 339	6 650 242	6 489 553	6 207 113	

### 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

The Finnish Transport and Communications Agency (Traficom) is responsible for approving the procedures which ATM, ANS/CNS/COM and MET service providers follow to notify Traficom of all planned safety-related changes to their functional systems.

Traficom has established administrative procedures and work instructions for change management according to Implementing Regulation (EU) No 2017/373.

Safety-related changes to service providers functional systems are managed by procedures, which are approved by Traficom. These procedures are regularly audited by Traficom in the framework of Implementing Regulation (EU) No 2017/373.

For major airspace changes, a pre-defined cycle is followed, where airspace change requests are provided to Traficom by end of May each year. The changes are worked through the summer/fall period in a coordination groups consisting of ANSP, airspace users, general and state aviation etc.

After the interests of stakeholders have been coordinated, the airspace change is sent for approval to the competent authority. If there are changes that need update on aviation regulations, a separate process for regulatory changes is applied. For restricted areas that are set by a government decree, a separate process is followed that is done by the ministry.

The airspace changes will be applied in April of each year, and coordination is done also internationally if there are changes that effect e.g. areas over international waters.

## 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

Finland	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

Finland - 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	fraction of min	±0,005 min
Max bonus (≤2%)	% of DC	0,00 %
Max penalty (≥ Max bonus)	% of DC	2,00 %

b) Pivot values - En route

Basis for the annual setting of pivot values	Modulated
--	-----------

c) Modulation mechanism (if applicable)

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

Modulation mechanism of pivot values	A) Unforeseen changes in traffic
--------------------------------------	----------------------------------

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 <b>equal</b> to the yearly update of reference values provided by the Network Manager in the NOP	Yes
2) the pivot value for year N is <b>informed</b> by the yearly update early update of reference values by the Network Manager in the NOP	No
If 2) applies describe the principle and formulas on the basis of which the pivot values are calculated	
n/a	

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
n/a

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
n/a

## 5.2.2 - Capacity incentive scheme - Terminal

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

Terminal	Expressed in	Value
Dead band $\Delta$	fraction of min	0,004
Max bonus ( $\leq 2\%$ )	% of DC	0,00 %
Max penalty ( $\geq$ Max bonus)	% of DC	1,50 %

### b) Pivot values - Terminal

Basis for the annual setting of pivot values	Modulated
--	-----------

### c) Modulation mechanism (if applicable)

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

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

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

#### Option A) - Modulation based on unforeseen changes in traffic

The pivot value for year N is modulated in order to enable significant and unforeseen changes in traffic to be taken into account	No
---	----

Description the principle and formulas on the basis of which the pivot values are calculated

n/a

#### 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

Terminal capacity target is 0,14 including all delay codes. For capacity incentives modulation to cover only CRSTMP causes is applied.

Since 2014 delay causes related to ATC capacity, ATC routing, ATC staffing, ATC equipment, airspace management and special events have been very low. The average delay in RP2 for these causes is below 0,01 min/flight and the highest has been below 0,02 min/flight. During RP3 these delays have been zero.

These very low delays are practically insignificant when taking into account all causes. However, they should not increase significantly.

In this incentive scheme the pivot value is set to 0,01 min/flight for these limited causes. This entails that the pivot level is commensurate with the historical and expected performance. Dead band is 0,004 min/flight and bonus/penalty range is 50% of the pivot value. With any greater dead band the incentive scheme would not comply with the regulation as there would be no smooth sliding scale.

#### 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

n/a

### 5.3 - Optional incentives

Total maximum bonus for all optional incentives (≤2%):	0,0%
--	------

Total maximum penalty for optional incentives (≤4%):	0,0%
--	------

Number of optional incentives	0
-------------------------------	---

## 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 NSA is monitoring all KPIs on a regular basis through various data sources (e.g. PRB Dashboard and PRU portal). The monitoring is done as a review of the actual figures that are obtained from the data sources. This will be done twice a year, in addition to the yearly monitoring report procedure.

NSA is allowed to obtain information from ANSP and other entities based on the Finnish Aviation Act. This will be done as necessary, to monitor the performance and conduct oversight (e.g. cost eligibility).

Cost verification audit on ANSP's actual costs is done yearly according to NSA's annual audit plan.

### 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 NSA notices that targets are not reached, it will approach the ANSP to discuss about the situation and possible need for corrective actions. If it is foreseen that the targets will be reached by the end of the RP4, no strong measures are expected by NSA.

## 7 - ANNEXES

---

ANNEX A. REPORTING TABLES & ADDITIONAL INFORMATION (EN-ROUTE)  
ANNEX A.x - En route Charging Zone #x  
ANNEX B. REPORTING TABLES & ADDITIONAL INFORMATION (TERMINAL)  
ANNEX B.x - Terminal Charging Zone #x  
ANNEX C. CONSULTATION  
ANNEX D. LOCAL TRAFFIC FORECASTS  
ANNEX E. INVESTMENTS  
ANNEX F. BASELINE VALUES (COST-EFFICIENCY)  
ANNEX G. PARAMETERS FOR THE TRAFFIC RISK SHARING  
ANNEX H. RESTRUCTURING MEASURES AND COSTS  
ANNEX I. PARAMETERS FOR THE MANDATORY CAPACITY INCENTIVES  
ANNEX J. OPTIONAL KPIs AND TARGETS  
ANNEX K. OPTIONAL INCENTIVE SCHEMES  
ANNEX L. JUSTIFICATION FOR SIMPLIFIED CHARGING SCHEME  
ANNEX M. COST ALLOCATION  
ANNEX N. CROSS-BORDER ANS  
ANNEX O. JUSTIFICATIONS FOR THE LOCAL SAFETY TARGETS  
ANNEX P. JUSTIFICATIONS FOR THE LOCAL ENVIRONMENT TARGETS  
ANNEX Q. JUSTIFICATIONS FOR THE LOCAL CAPACITY TARGETS  
ANNEX R. JUSTIFICATIONS FOR THE LOCAL COST-EFFICIENCY TARGETS  
ANNEX S. INTERDEPENDENCIES  
ANNEX T. OTHER MATERIAL  
ANNEX U. VERIFICATION BY THE NSA OF THE COMPLIANCE OF THE COST BASE  
ANNEX V. IMPLEMENTATION OF ATM MASTER PLAN  
ANNEX Y. RESPONSES TO COMPLETENESS VERIFICATION  
ANNEX Z. CORRECTIVE MEASURES