

Nr	Performance Plan section	Topic	Finding	Response
1	1.1	List of entities and geographical context	<p>In Section 1.1.1, Swedavia is indicated as an en route ANSP. Please correct/clarify.</p> <p>Swedavia is indicated as an ATS/CNS provider. Similarly, in Section 3.4.3. the description includes ATS services. If it is the case, please complete the related safety targets and measures. Please clarify/correct.</p> <p>CNS providers are indicated as ATS providers in Section</p>	<p>Swedavia is represented as a CNS Infrastructure-provider. Swedavia have this role for ARN (TNC) and other airports providing approach (and therefore also is a provider En Route)</p> <p>From the construction of the market in Sweden airports are the owners of infrastructure, including some infrastructure considered ATS. It should not be understood that they are ATS providers however.</p> <p>Same reference/response as for Swedavia above. Please request</p>

			<p>3.4.3. However, it is understood that such entities only provide CNS services. If it is the case, please complete the related safety targets and measures. Please confirm/correct.</p> <p>In Section 1.1.2 of the draft performance plan, only the SAR entity has been reported to be in the scope of the draft performance plan in addition to the ANSPs listed in 1.1.1.</p> <p>The NSA should be reported in this item. Please complete.</p>	<p>a meeting on the subject if further clarification is needed.</p> <p>Completed. Also added the Space Weather provision.</p> <p>Completed</p>
2	1.2 3.4 Annex A Annex B	Traffic forecasts	<p>Please review and, if deemed necessary, update the traffic forecast for en route services and for terminal services in light of the Eurocontrol STATFOR base traffic forecast published on 15 October 2024.</p>	<p>The performance plan is updated concerning En Route and Terminal. The differences to previous traffic forecasts were marginally increases. SE has changed on the request by users´.</p>

				<p>In the PP the new forecasts are manually inserted. Apparently there have been instructions on how to change according to the construction of the template. This instruction has unfortunately been missed in the 15th of November submission. Sweden can of course do an update according to the instructions, if that is of convenience in any of procedures PRB might have.</p>
3.	2.1 Annex V	Investments	<p>For LFV in Section 2.1, the new major investment A3 included in Table A reports a higher net book value in 2026 compared to the total value of the asset. Please clarify.</p> <p>The major investments C1 and C3 included in Table C of Section 2.1 do not report the total value of the assets and any costs in RP4, despite the date into operation included</p>	<p>Corrected</p> <p>The investment referred to as Coopans is now Coopans ATC One. Other development has not materialised as planned. There has been no costs.</p>

			<p>in the RP3 adopted performance plan reported "not during RP3". Pleaseclarify/explain.</p> <p>Additionally, kindly review the lifecycle for investment 3.</p> <p>For investments in new ATM systems and major overhauls of existing systems, the information on consistency with the European ATM Master Plan is either missing or insufficient in both Section 2 and Annex V. Please complete.</p>	<p>There are different lifecycles, either 5 or 10 years, depending on the components.</p> <p>Unfourtnately there have been misunderstandings on the application of Annex V so this has now been complemented.</p> <p>The situation of Sweden is that there is severe loss of traffic due to the Ukraine war and in order to mitigate the effect, only the most necessary, economic beneficiary and required projects will be executed during RP4.</p>
4.	2.2 Annex A	Investments, Annex A and B	For SDATS in Section 2.2, the determined costs of investments in Annex A	corrected

			<p>(items 3.10-3.12) do not align with those derived from Section 2.2 of the draft performance plan (presented in '000 NC). Please correct.</p> <p>For SDATS in Section 2.2 the depreciation amounts are the same for every year, while the NBV varies from year to year. Please correct or explain.</p>	<p>Since there are no additional investments for the provider, it is our understanding that the NBV should diminish with the depreciation in the same (yearly) pace.</p>
5.	2.3 Annex A	Investments, Annex A and B	For ACR in Section 2.3, the determined costs of investments in Annex A (items 3.10-3.12) do not align with those derived from Section 2.3 of the draft performance plan (presented in '000 NC). Please correct.	corrected
6.	2.4	Investments, Annex A and B	For SHMI in Section 2.4, it is noted that the amounts are presented in '000 NC	Corrected
7.	2.5 Annex A	Investments, Annex A and B	For ARV in Section 2.5, the determined costs of investments in Annex A	Corrected

			(items 3.10-3.12) do not align with those derived from Section 2.5 of the draft performance plan. Please correct	
8.	2.6	Investments, Annex A and B	For Swedavia in Section 2.6, it is noted that the amounts are presented in '000 NC	Corrected
9.	2.7 Annex A	Investments, Annex A and B	For the CNS providers in Section 2.7, the determined costs of investments in Annex A (items 3.10-3.12) do not align with those derived from Section 2.7 of the draft performance plan (presented in '000 NC). Please correct.	Corrected
10.	3.1	Safety targets Safety measures	The draft performance plan is missing the EoSM targets for Swedavia in section 3.1.1a . Please complete. Safety information is required for all certified providers under the scheme.	Swedavia is represented as a CNS Infrastructure-provider. Swedavia have this role for ARN (TNC) and other airports providing approach (and therefore also is a provider En Route)

			<p>Main measures put in place by Swedavia to achieve the safety performance targets have not been provided in 3.1.1 c). Please complete.</p> <p>The description of main measures put in place to achieve the safety performance targets for all the other provides is not sufficiently detailed in 3.1.1 c). Please complete</p>	<p>From the construction of the market in Sweden airports are the owners of infrastructure, including some infrastructure considered ATS. It should not be understood that they are ATS providers however.</p> <p>The text of 3.1 c has developed with a few examples. SE needs to stress that safety is always top priority in all planning and considerations of the interdependency of safety in regard to other performance areas is always present.</p> <p>If the text is not enough to clarify the observed items, please request a meeting. There were no questions on this segment during the consultation.</p>
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11.	3.2	Environment targets - measures	In Section 3.2.1 (c) the description provided in this section is limited. Please revise, providing a detailed description of the main measures to be implemented during RP4 to achieve the proposed targets.	More information provided
12.	3.3	En route capacity measures	in Section 3.3.1 c,) the description of capacity enhancement measures is lacking sufficient detail and does not refer to the measures included in the NOP. Please clarify/complete.	More information provided
13.	3.4 Annex A	Costs for space weather information services	<p>Please include the proportional share of costs allocated to the en route charging zone in respect of the ICAO space weather information services provided in the SES area.</p> <p><i>Reference: Joint Declaration by the States in the Single Sky Committee on the inclusion of</i></p>	Updated the MET – sheet and included the costs understood to be carried by Sweden according to the joint declaration.

			<i>charges for space weather information services in their RP4 performance plans</i>	
14.	3.4.1 3.4.2 3.4.6 Annex A Annex F	Cost-efficiency	<p>In Section 3.4.6 the information on the NSA verification has not been provided for any entity. Please complete.</p> <p>In Section 3.4.1 and in Annex A, under Tables a) and b) the 2019 baseline traffic does not take account of the adjustment M2/M3 detailed in c). Please correct.</p> <p>Please revise the Table under b) of Section 3.4.1 to ensure the right format in the reporting of the baseline adjustments (Table pasted on row higher than required).</p> <p>Please provide the Annex F referred to in respect to some</p>	<p>Corrected</p> <p>Corrected</p> <p>Corrected</p> <p>An Annex F is provided</p>

			<p>adjustments to the 2024 baseline costs.</p> <p>In Section 3.4.1 under f), 3.4.2 under e) and in Annex R, in relation to the measures put in place to achieve the en route and terminal cost-efficiency targets, please provide additional details on the cost containment measures planned over RP4 to address the negative impact of the traffic lost as a consequence of Russia's war of aggression against Ukraine</p>	There have been an amended section in Annex R
15.	3.4.1 3.4.2 Annex A Annex B	Inflation rates	In Sections 3.4.1 and 3.4.2, as well as in Annexes A and B, the actual inflation rate 2023 is not in line with Eurostat (April 2024) and the inflation rates for 2024 and 2025 are not in line with the IMF May 2024 forecast, leading to a difference in indexes for each	Corrected

			year of RP4. Please correct or justify.	
16.	3.4.1 3.4.2	Cost-efficiency - Baseline Values	In Section 3.4.2, the sign of the adjustment reported under b) and c.1) does not match (-25,000,000 vs. +25,000,000). In addition, the amounts in real terms do not appear due to incorrect filling of the information on the exchange rate and inflation in cells D22 to D24. Please correct.	Corrected
17.	3.4.3	Cost allocation - ATSP/CNSP	<p>In Section 3.4.3, the following issues are observed: For LFV, inconsistencies have been observed in respect of the total determined costs in both en route and terminal charging zones, between Table b) of Section 3.4.3 and Annexes A and B (item 4.2). Please correct.</p> <p>For SDATS, ACR, and Swedavia, under d), it is</p>	<p>Corrected</p> <p>There have been amended descriptions and changes,</p>

			<p>indicated that those entities do not provide any terminal ANS at airports outside the scope of the performance plan, in contradiction to the services described under a). Please correct and complete.</p> <p>Additionally, under b), the costs allocated to terminal services at airports outside the scope of the performance plan is not provided. Please correct and complete.</p>	<p>hopefully providing clarifications. There have probably been a misunderstanding on how the reporting should be done. Sweden has initially described the total costs, allocated by TSFS 2020:44, not only the costs subject to the cost base of RP4</p>
18.	3.4.4	Cost allocation – METSP	<p>In Section 3.4.4, under b), the costs allocated to terminal services at airports outside the scope of the performance plan are not provided and the allocation of MET costs between en route and terminal services is not explained</p>	Corrected

			under c). Please correct and complete.	
19	3.4.6 Annex A Annex B	Cost-efficiency - cost assumptions	<p>The figures included in Tables a) and b) of Section 3.4.6.1 of the draft performance plan are not fully consistent with Annexes A and B for all ANSPs. Please clarify/correct.</p> <p>In Section 3.4.6, in "a) Staff costs" for LFV, please provide details on the nature of the one-off pension effect included in Actual 2023 and Forecast 2024.</p>	<p>2024 will differ because of costs connected to ANSP CNS divided are included in ANSP LFV, ACR and SDATS under 2024.</p> <p>More information provided</p>
20.	3.4.6	Composition of the determined costs (communications costs)	<p>In Section 3.4.6.1 b), the requested breakdown of costs for communication services is reported as unavailable.</p> <p>If precise information is not available, please provide an estimate about the costs incurred for each category of</p>	<p>Updated.</p> <p>On Iris. The costs for satellite link is N/A due to that factors as technical solution, deployment and availability are</p>

			<p>communication services. In case of unavailable information, please provide a detailed justification.</p> <p>Furthermore, please indicate whether the ANSP intends to make use during RP4 of the IRIS satellite communication services for ATM and, if yes, what are the related costs planned to be incurred.</p>	<p>under discussions and/or development – nor is contract(s) available. There are no costs in the RP4.</p>
21.	3.4.6	Cost-efficiency - cost assumptions	<p>Part d) of Section 3.4.6 on accounting provisions is not filled in in relation to the provisions being reported in part a). Please complete.</p>	<p>There have been clarifications on the matter in E 43, 44.</p> <p>The reporting can be misinterpreted from our side, what is reported is the change of pensions, uncontrollable costs and the changes from year to year. For the assumption of RP4 there is a fixed interest rate and hence no fluctuations, and therefore not any anticipated costs/accounting provisions.</p>

22.	3.4.6 3.4.8	Cost of capital	<p>In Section 3.4.6.1 for LFV, d) is not filled in. Please complete.</p> <p>In Section 3.4.6.2 for LFV, under b) it seems that the cost of capital takes account of elements which should not be included in the asset base or the cost of capital, but rather in staff costs. Please clarify/correct.</p> <p>For all ANSPs:</p> <p>- In Section 3.4.6.2, the information provided under b) should be reviewed as many elements are inconsistent with the information provided in Annexes A and B, and Section d) on the provisions should be filled in where appropriate.</p>	<p>We interpret this as the same observation as above.</p> <p>LFV has not any loans but uses the pension debt to finance investments. The pension debt is indexed by the rate of the inflation and therefore the inflation is the interest rate applied.</p> <p>Corrected</p> <p>Corrected</p>
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			<p>- Section 3.4.6.4 has not been filled in. Please complete.</p> <p>Section 3.4.8 has not been filled in. Please complete.</p>	<p>There should be the option to choose 0 number of loans. It is not filled in because the ANSP has no loans.</p>
23	3.5	Additional KPIs	<p>Section 3.5 The draft performance plan states there is 1 additional KPI, however, the template is not filled in. Please clarify/complete.</p>	<p>There are 0 add KPIs. Now corrected.</p>
24.	3.6	Interdependencies	<p>In Section 3.6.2 the information provided is limited. Please revise providing a detailed description of the ongoing and future projects to increase performance further to achieve the targets as traffic increases.</p>	<p>It has been some additional information added. It has to be remembered that the current situation is that capacity is well in line with the targets and the current local KEA is performing very well.</p>
25.	4.1	Cross border initiatives	<p>In Section 4.1.1 the description of the cross-border areas is missing information. Please complete.</p> <p>In Section 4.1.2., the information on cross-border</p>	<p>Completed</p>

			initiatives is missing. Please clarify/complete.	
26.	4.2 Annex A Annex B	SESAR Common Projects	Inconsistencies have been observed in respect of the total RP4 determined costs for common projects, between Section 4.2 and Annexes A and B (item 3.9). Please clarify/correct.	Corrected
27.	5.2	Terminal Incentive Scheme	In Section 5.2.2 the combination of the dead band and the proposed modulation of the pivot value results in a bonus/penalty range that is only 0.0025 minutes per flight wide.	Sweden has considered the observations but decided to stay with the proposal since any alternative would not have any material impact on the incentive/performance.

