

<p>RESOLUTION OF THE EXECUTIVE COMMITTEE</p> <p>23-02-2026</p>
<p>SUBJECT: <i>ACTIVITIES AND CHARGES SUBJECT TO ECONOMIC REGULATION. CONSULTATION PROCESS ON LANDING CHARGE AND NOISE MODULATION 2026</i></p>
<p>BASIC DOCUMENTS : Internal Communication no. 797226/ DCA, dated 23-02-2026</p>
<p>DISCLOSURE: ANA's website</p>

Under the terms of Decree-Law no. 254/2012 of 28 November, as amended by Decree-Law no. 108/2013 of 31 July, and the Concession Contracts for public airports services signed with the Portuguese State, ANA Aeroportos de Portugal SA (ANA) is the Concessionaire of the national airports located in mainland Portugal (Lisbon, Porto, Faro and Beja), in the Autonomous Region of the Azores (Ponta Delgada, Santa Maria, Horta and Flores), and the regional airports of the Autonomous Region of Madeira (Madeira and Porto Santo).

In strict compliance with the determination issued by ANAC in its provisional resolution regarding the regulated charges for 2026, and considering the comments submitted within its analysis of the consultation process on those charges, ANA has reformulated the proposed landing charge applicable at the airports in the Lisbon Group, Porto and Faro, presenting two alternative scenarios regarding noise modulation: (1) maintaining noise modulation at all ANA network airports, with a new proposal for noise factors based on the principle of neutrality; or (2) eliminating noise modulation at all ANA network airports.

The specificity of the subject matter, the purpose of the consultation, and the expressed intention to align this consultation with ANAC's final decision calendar for the 2026 regulated charges—thus avoiding additional impacts on the charges process—constitute exceptional circumstances that justify conducting the consultation within a period considerably shorter than the 120 days, as provided for in Article 71(3) of Decree-Law no. 254/2012.

Therefore, with the aim of implementing the 2026 landing charge on 1 April 2026, ANA formally launched the consultation process on 28 January 2026 with Users, their representatives or associations operating at the airports in the Lisbon Group (Lisbon, Ponta Delgada, Santa Maria, Horta, Flores, Madeira and Porto Santo), and at the airports of Porto and Faro, as well as with the Autonomous Regions of the Azores and Madeira, pursuant to Articles 71 and 79 of Decree-Law no. 254/2012.

Subsequently, ANA analysed and replied to the comments received from Users and from the Autonomous Region of Madeira and produced the response dossier for the consultation process on the landing charge, which forms an integral part of this resolution and was sent to all participating entities, as well as to ANAC, thereby fully complying with Article 71(4) of Decree-Law no. 254/2012.

With the consultation on the 2026 landing charge now complete, and in accordance with Decree-Law no. 254/2012 and Annex 12 of the Concession Contract, the following should be noted:

- a. The application of charge modulation associated with noise constitutes a strategically important measure for reducing noise at source by promoting the use of quieter aircraft, thus reducing noise levels and their impact on surrounding populations. Noise reduction at source (aircraft) is a key strategy for the sustainable development of air transport within the framework of the Balanced Approach set out in European Union Regulation no. 598/2014 of the European Parliament and of the Council of 16 December 2014. This measure is widely adopted in European airports and is also included in the Noise Action Plans for Lisbon and Porto Airports approved by APA (Portuguese Environment Agency).

- b. The noise modulation applied across ANA airports has yielded very positive results, encouraging growing use of quieter aircraft throughout the ANA network.
- c. The ANA proposal for the landing charge, presenting two alternative scenarios for noise modulation, maintains the traffic forecasts supporting the original proposal submitted on 29 August 2025 and follows principles of transparency and non-discrimination among Users, with an appropriate degree of proportionality and economic rationality, consistent with best industry practice.
- d. Scenario 1 proposes maintaining the existing noise modulation structure (in place since 2023), retaining the number of aircraft classes subject to penalties and bonuses, and ensuring the neutrality of category 5 noise factors in the landing charge. The proposed values for the noise factors ensure the neutrality of the modulation revenue at the time of its proposal, taking into account the traffic forecasts for 2026. They are also competitive compared with those applied at various European airports comparable to the ANA network airports, with penalties and incentives that are higher or in line with those in force when the model was created in 2023.”
- e. Scenario 2 eliminates noise modulation, an option available to ANA under the law and point 2.7 of Annex 12 to the Concession Contract, which establishes ANA’s freedom to define tariff structures and amounts, provided Regulated revenue price cap limits are respected. Removing noise modulation entails eliminating established noise factors and adjusting the base landing charge factor.
- f. In Scenario 1, which ANA prefers, no recovery of revenue deviations due to modulation between 2023 and 2025 is foreseen. Likewise, no correction mechanism for revenue deviations relating to noise modulation is established for Porto and Faro airports (for the Lisbon Group, deviations are recovered or returned through the estimation-error adjustment mechanism of Annex 12 of the Concession Contracts.
- g. The cap on increases to regulated charges at Porto and Faro airports, based on HICP evolution, applies only to the base landing charge factor (€/tonne MTOW). Noise modulation is not included in this base, as it operates as a bonus/malus percentage.
- h. The revenue arising from the proposed noise factors is capped at the level that would result from the no-modulation scenario. Both scenarios generate the same revenue per airport.
- i. During the consultation process, some Users expressed willingness to support an updated noise modulation model for future years. ANA considers that any future model, even with structural or value changes, must continue to follow the same structural principles: objective differentiation based on acoustic performance, incentives for efficient aircraft and penalties for noisier ones. Therefore, improvements or evolutions only make sense if modulation continues. Eliminating modulation in 2026 while simultaneously introducing a new model would be inconsistent with ICAO policy principles and with ANA’s recent application of the model.

Having regard to all of the above, and considering the consultation process for the 2026 landing charge and the participation of Users, their representatives or associations, and the Autonomous Regions of the Azores and Madeira, the Executive Committee decides, pursuant to subparagraph b) of Article 7(1) and Article 71(4) of Decree-Law no. 254/2012, and based on all basic documentation forming part of this resolution:

1. To approve the proposed landing charge, effective at all ANA network airports from 1 April 2026.
2. To approve the maintenance of noise modulation at all airports in the ANA network, with the adjustment of the noise factors that were proposed and submitted to consultation, which fully meet the intended objectives, namely the neutrality of the modulation at the time it is proposed and taking into account the traffic forecasts for 2026 (scenario 1).”

3. If Scenario 1 is not approved by ANAC, ANA considers that conditions to maintain modulation are not met, and therefore the noise modulation shall be withdrawn, and the landing charge applied under Scenario 2.

This 2026 charges resolution is issued without hearing of interested parties, under subparagraphs d) and e) of Article 124(1) of the Administrative Procedure Code, approved by Decree-Law no. 4/2015 of 7 January, and is set out in the landing charge tables forming Annex I.

It is further decided:

- i) To publish this resolution and the approved charge tables (Annex I) on the ANA website no later than 23 February 2026, pursuant to Article 71(5) of Decree-Law no. 254/2012; and
- ii) To send the 2026 landing charge consultation dossier (Annex II) to all participating Users and to ANAC, thereby complying with Article 71(4) of Decree-Law no. 254/2012.

Raphaël Pourny

Member of the Executive Committee

Thierry Ligonnière

Chairman of the Executive Committee

Annexes:

Annex I: Landing charge table, effective 1 April 2026

Annex II: Dossier of the 2026 landing charge consultation process