



Draft Decision
on Winter 2024 Coordination Parameters
at Dublin Airport

11 April 2024

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1. Executive Summary

- 1.1 The IAA is responsible for declaring coordination parameters at coordinated Irish airports. In this paper we set out our Draft Decision on the Dublin Airport parameters for the Winter 24/25 ('W24') season, which runs from 27 October 2024 to 29 March 2025 inclusive.¹ The proposed coordination parameters are laid out in the appendix.
- 1.2 The Coordination Committee, comprising Dublin Airport², AirNav Ireland (the Air Navigation Service Provider), and airlines operating at Dublin Airport, is required under Article 5 of the Slot Regulation to provide advice to the IAA on the coordination parameters to be declared in accordance with Article 6. The majority advice, driven by the votes of airlines, is not to implement any capacity parameter associated with certain planning conditions relating to the annual capacity of terminals 1 and 2 at Dublin Airport, while also to '*consider*' increases to the runway parameters, subject to modelling and further engagement with the Coordination Committee.
- 1.3 To appropriately take account of these planning conditions, we propose to implement a seat capacity limit of 14.4 million seats for the W24 season. Other parameters are proposed to be unchanged relative to the Winter 23/24 season ('W23').
- 1.4 We invite responses to this Draft Decision no later than 5pm, **Wednesday 24 April 2024**. Responses should be sent by email to consultation@iaa.ie.³

¹ As per the worldwide slot calendar: <https://www.iata.org/contentassets/4ede2aabfcc14a55919e468054d714fe/calendar-coordination-activities.pdf>

² We use the term 'Dublin Airport' to refer to the regulated entity within daa plc.

³ We may correspond with those who make submissions, seeking clarification or explanation of their submissions. Ordinarily, we place all submissions received on our website. If a submission contains confidential material, it should be clearly marked as confidential and a redacted version suitable for publication should also be provided. We do not ordinarily edit submissions. Any party making a submission has sole responsibility for its contents and indemnifies us in relation to any loss or damage of whatever nature and howsoever arising suffered by us as a result of publishing or disseminating the information contained within the submission.

2. Background

Legislation

- 2.1 Section 8(1) of the Aviation Regulation Act, 2001, as amended, provides that the IAA is the competent authority in Ireland for the purposes of Council Regulation (EEC) No. 95/93, as amended ('the Slot Regulation'). The IAA is therefore responsible for:
- The designation of the Coordination status of Irish airports.
 - Appointing a qualified schedules facilitator or coordinator, as appropriate, at airports which have been designated as Schedules Facilitated or Coordinated.
 - The determination of coordination parameters at Coordinated airports in line with Article 6 of the Slot Regulation, taking account of relevant technical, operational and environmental constraints as well as any changes thereto.
 - Deciding whether to approve Local Guidelines proposed by the Coordination Committee.
- 2.2 Dublin Airport is designated as Coordinated by the IAA. Airport Coordination Limited (ACL) is the appointed coordinator.
- 2.3 Under Article 5 of the Slot Regulation, one of the roles of the Coordination Committee is to advise the IAA on the coordination parameters to be determined in accordance with Article 6. The IAA attends Coordination Committee meetings as an observer.
- 2.4 Article 6(1) states that the determination of the parameters '*shall be based on an objective analysis of the possibilities of accommodating the air traffic, taking into account the different types of traffic at the airport, the airspace congestion likely to occur during the coordination period and the capacity situation*'. Thus, the determination of the parameters is a forward-looking projection in which we take account of expected demand, capacity (including airspace capacity), and relevant constraining factors, during the relevant season, in an objective manner.
- 2.5 Article 6(3) of the Slot Regulation details the required interaction between the IAA and the Coordination Committee:
- 'The determination of the parameters and the methodology used as well as any changes thereto shall be discussed in detail within the coordination committee with a view to increasing the capacity and number of slots available for allocation, before a final decision on the parameters for slot allocation is taken. All relevant documents shall be made available on request to interested parties.'*
- 2.6 In that regard, when taking account of relevant constraints in issuing a capacity declaration, we tend towards a maximal rather than minimal approach as regards declaring the airport capacity parameters. This is because of the

requirement that discussion within the coordination committee is *‘with a view to increasing the capacity and number of slots available for allocation.’* This framing of the determination of the parameters is given further weight where a parameter is expected to have a constraining effect on demand, given that Article 6(1) requires the determination to be based on the *‘possibilities of accommodating the air traffic’*.

Coordination Committee Process for W24

2.7 Ahead of the W24 season, the primary focus of the Coordination Committee was on how to take account of certain planning conditions relating to terminals 1 and 2 at Dublin Airport. Specifically, Condition 3 of the Terminal 2 planning permission F06A/1248 (PL 06F.220670), from 2007, states that:

‘The combined capacity of Terminal 2 as permitted together with Terminal 1 shall not exceed 32 million passengers per annum unless otherwise authorised by a further grant of planning permission.’

2.8 Similarly, Condition 2 of a Terminal 1 extension planning permission (06F.223469 & F06A/1843), from 2008, states that:

‘The combined capacity of Terminal 1 (including the extension authorised by this grant of permission) and Terminal 2 granted permission under planning register reference number F06A/1248 (An Bord Pleanála appeal reference number PL 06F.220670) shall not exceed 32 million passengers per annum unless otherwise authorised by further grant of planning permission.’

2.9 We will refer to these collectively as *‘the 32mppa Conditions’*.

2.10 Subsequent to the last (Summer 2024) capacity declaration process, daa, as the owner of the planning permissions, and in an effort to ensure its compliance with the 32mppa Conditions, proposed a Local Guideline under Article 8(5) of the Slot Regulation, which would suspend the allocation of slots to ad hoc passenger operations. The Coordination Committee voted against this and consequently it was not proposed to the IAA for assessment/approval. Dublin Airport then sought the advice of the IAA as to how the slot allocation process might otherwise support daa’s efforts to comply with the 32mppa Conditions.

2.11 In a letter of 29th January 2024 to Dublin Airport, we reiterated that the capacity declaration process itself, rather than local guidelines, might be the more appropriate mechanism to address this matter. We suggested that, if Dublin Airport considered that additional measures or adjustments to forthcoming capacity declaration(s) might be necessary to take account of the 32mppa Conditions, Dublin Airport should proceed without delay to consider what those measures or adjustments might be, and engage with the Coordination Committee as soon as practicable. The IAA confirmed its willingness to discuss with Dublin Airport any measures or adjustments it might have been considering in that regard.

2.12 We also confirmed our understanding that, in light of the 32mppa Conditions, and unlike previous seasons, Dublin Airport would not make any other

proposals to increase other capacity parameters, such as the runway parameters. Consequently, we noted to the Coordination Committee Chair that the IAA would not carry out any simulation modelling ahead of W24, given the absence of any proposals for adjusted parameters for us to model.

- 2.13 Following our letter of 29 January, an Extraordinary General Meeting (EGM) of the Coordination Committee was called. The Coordination Committee decided at that EGM to establish a sub-Committee to evaluate the options as regards taking account of the 32mppa Conditions, and to propose processes for ensuring that capacity would continue to be allocated in a fair and transparent manner for W24 and beyond. This sub-Committee was composed of representatives of Dublin Airport, representatives of various airlines, and a mediator from the consultancy company Mott MacDonald, to facilitate the sub-Committee discussions. The IAA attended as an observer, as it usually does at Coordination Committee meetings in advance of seasonal capacity declarations. The sub-Committee met on 27 February, 5 March, 12 March, and 19 March to discuss the potential options to bring forward to the full Coordination Committee.
- 2.14 In the first sub-Committee meeting on 27 February, a range of potential options was outlined. These were further refined and expanded upon in subsequent sub-Committee meetings. The W24 pre-meeting of the full Coordination Committee then took place on 25 March. Dublin Airport provided an overview of the actual W23 operational performance, infrastructural capacity enhancements coming on-stream for the W24 season, and a planning conditions update. The set of refined potential measures identified by the sub-Committee were also presented for consideration by the full Coordination Committee. It should be noted that the below table does not represent any agreed positions of the sub-Committee members, but rather summarises the various views expressed by various members.

Table 2.1: Potential Measures Considered by the Sub-Committee

Measure	Impact
1. Do not declare new hourly runway slots and/or terminal limits in the seasonal capacity declaration. <ul style="list-style-type: none"> - However, with the new runway, should not withhold hourly capacity increases in W24 declaration. 	Will not prevent further growth over 32 mppa level.
2. Declare a new seasonal ATM and/or Seat Cap capacity limit. <ul style="list-style-type: none"> - Set limit to accommodate historic slots – new allocations would be limited by the seasonal limit. - Should focus on managing seat capacity growth rather than movements. 	Would limit further growth from W24.
3. Request voluntary flight cancellations and/or passenger limits from airlines (to be considered JNUS). <ul style="list-style-type: none"> - Reductions should not only apply in winter, as impacts too much on year-round operators. - Voluntary measures with JNUS protections is only option with broad airline support.* 	Could reduce towards the 32 mppa level. For ACL to grant JNUS there would need to be mandated reductions, although voluntary reductions could be part of a mandatory scheme.
4. Mandatory pro-rata passenger reductions to be applied in a fair and non-discriminatory manner. <ul style="list-style-type: none"> - Not supported by airlines – but if imposed, need reasonable notice period (eg, ~100 days minimum). - A “narrowest interpretation” of the passenger limit (eg, excluding all transfer passengers) should be applied to minimise/eliminate need for reductions. 	

Source: Coordination sub-Committee, views of members as summarised by the mediator.

*JNUS refers to the concept of Justified Non Use of Slots, as provided for by the Slot Regulation.

- 2.15 As is apparent from Table 2.1 above, with the exception of the first measure which essentially involves rolling forward the W23 parameters to W24, these proposals were limited to broadly stated principles, as opposed to any specific proposals for new or amended coordination parameters. No specific proposals on measures 2 to 4 were forthcoming from any member. For example, in relation to the possibility of a seasonal seat cap, there was no proposal as to what seat cap should be set, and how it should operate. Nor was there a specific proposal regarding the mechanism or legal basis which could lead to, for example, ‘*mandatory pro-rata passenger reductions*’, nor any specific proposal made as to what these reductions would be or on what basis they would be pro-rated.
- 2.16 Discussions at the pre-meeting on 25 March showed a degree of uncertainty within the wider group as to the measures put forward by the sub-Committee. The interpretation of the 32mppa Conditions was disputed, with some members suggesting that the 32mppa Conditions should not be reflected as a capacity parameter until final clarification as to their meaning and effect is obtained from a court. Furthermore, some participants advocated for an increase in runway capacity for the W24 season, if modelling were to be carried out in support of

any such increases. Again, no specific proposals were made.

- 2.17 Given the disagreement on the range of measures put forward by the sub-Committee, a series of statements and questions, as set out in Table 2.2 below, was proposed for voting by the Coordination Committee at the final meeting on 28 March. Each member was asked to agree, disagree, or abstain. Point number 1 was proposed by an airline and 2 to 6 were proposed by Dublin Airport.

Table 2.2: Coordination Committee Voting Points

Voting Points
1. Condition 3 is ambiguous and until it is clarified, it should not be considered in the W24/25 declaration.
2. Do you agree passenger growth should be paused for Winter 24/25 season?
3. To remain compliant with the adjusted terminal passenger limit of 32mppa, a new seasonal seat cap should be considered in W24/25.
4. Should historic rights to slots be honoured in full for W24/25?
5. Additional runway slots should be considered to make use of the dual runway capacity subject to modelling and further review by the Coordination Committee.
6. If reductions in passenger numbers are required to remain compliant with the adjusted terminal passenger limit of 32mppa, Summer 24 should also be considered for action.

Source: Coordination Committee

- 2.18 Clarification on point number 5 was sought by AirNav Ireland, as no assessment had been conducted around adding additional runway capacity. While some members pointed to additional capacity potentially improving efficiency by allowing airlines to adjust slot times, Dublin Airport pointed out that at the beginning of the W24 process, it had highlighted that additional capacity leading to a higher service level cannot be facilitated as Dublin Airport is no longer in a *'business-as-usual'* situation.
- 2.19 As is again apparent from Table 2.2, the Coordination Committee voted on a series of broad principles and objectives, which pertain to the determination of the coordination parameters but also variously to the role of the coordinator and other matters outside the scope of the W24 capacity declaration and/or more generally outside the scope of processes governed by the Slot Regulation. This marks a change from previous seasons where the Coordination Committee voted on a specific proposal or proposals for the capacity parameters made by Dublin Airport.

Coordination Committee Vote

- 2.20 Coordination Committee members voted on the points outlined in Table 2.2. Voting rights for members are set out in the Coordination Committee constitution. A set number of votes are allocated to Dublin Airport and AirNav

Ireland (the Air Navigation Services Provider at Dublin Airport), with the rest allocated to airlines based on the number of movements flown at Dublin Airport in the preceding year. Only those who are present (online or in person) at the Coordination Committee can vote. We note that the voting process is an indicative part of the Coordination Committee's advice to the IAA, rather than the IAA being bound to follow the majority position. As part of the process, we take into account all positions set out by Coordination Committee members, as well as any associated comments or evidence relevant to the parameter declaration.

- 2.21 The results of the Coordination Committee's voting on the six points in Table 2.2 are outlined in the Appendix. The final advice letter sent to the IAA on 4 April 2024 is published alongside this document.
- 2.22 The Coordination Committee members voted overwhelmingly (93%) in support of the proposition/view that Condition 3 is ambiguous, and should not be '*considered*' for the W24 declaration until it is clarified. Dublin Airport and TUI were the only members who disagreed with this position. Dublin Airport, in its written comments, accepts that it could be argued that Condition 3 is ambiguous, but states that this ambiguity is not a reason for the condition to be disregarded for the W24 declaration.
- 2.23 Most Coordination Committee members disagreed that '*passenger growth should be paused*' for W24, with just Dublin Airport, Swiss and TUI voting in favour of this principle. Luxair, UPS and AirNav Ireland abstained. Dublin Airport qualified its position by saying that passenger growth should be paused for W24 only if that is required to ensure compliance with the 32mppa Conditions and claimed that it is for the IAA to determine whether this is the case.
- 2.24 The concept of '*considering*' a seasonal seat cap for W24 was rejected by most members of the Coordination Committee (92% of votes against it). Dublin Airport voted in favour, but again said that it should be considered only if it is required to ensure compliance with the 32mppa Conditions, and that this is for the IAA to determine.
- 2.25 With just AirNav Ireland abstaining, all Coordination Committee members agreed that historic rights to slots should be '*honoured*' in full for W24, with Dublin Airport noting that the appropriate granting of historic slots is in accordance with Slot Regulations, but stating that the appropriate actions to comply with the 32mppa Conditions were for the IAA to determine.
- 2.26 All Coordination Committee members, apart from Dublin Airport and TUI, then supported the consideration of additional runway capacity to make use of dual runway capacity, subject to modelling and further review. Swiss commented that this capacity should only be viable for time shifts and not passenger services, while Dublin Airport commented that additional runway slots should not be considered unless the IAA determines that these could be implemented without causing non-compliance with the 32mppa Conditions.
- 2.27 Finally, 50% of votes cast were in support of the concept that S24 '*would be*

considered for action', if required, as opposed to a sole focus on winter. Aer Lingus, who voted in favour, provided an additional comment that it only supports this option once all legal options have been exhausted. Dublin Airport, who also supported the principle, commented that the re-opening of S24 should only be considered if required to ensure compliance with the 32mppa Conditions, and that this was, again, for the IAA to determine.

3. Airfield Coordination Parameters

- 3.1 This section addresses runway parameters and parking stand parameters.
- 3.2 No specific proposals have been received from the Coordination Committee to alter runway parameters. We propose a roll-forward of the W23 runway parameters. That is, we propose to make no changes to the respective R60 limits and R10 limits for dual and single runway operations relative to the W23 parameters.
- 3.3 We retain the stand parameter as a hard constraint. Where demand for stands exceeds supply as per the count in the Appendix, movements are referred to Dublin Airport for detailed assessment.

Taxi Out times and On Time Performance (OTP) in Winter 2023

- 3.4 At the Coordination Committee pre-meeting on 25 March, Dublin Airport provided an update on outturn operational performance in W23 compared to W22.
- 3.5 On Time Performance (OTP) to the end of February has significantly improved in W23 compared to W22. This improvement has been uniform across both arrivals and departures, with the most marked uplift occurring in December. Aircraft Rotation remains the most significant source of delay minutes.
- 3.6 Across the full day, average taxi-out times fell in W23 compared with the W22 season. Notably, taxi-out times to Runway 28R (the North Runway) decreased by one minute year-on-year, while taxi-out times to Runway 28L showed a decrease of 19 seconds. Average first wave taxi-out times to Runway 28L were also 19 seconds shorter in W23 compared with W22.
- 3.7 A number of airfield, terminal, and pier projects are expected to be available in whole or in part for the W24 season. These are shown in Table 3.1 below.

Table 3.1: Major Projects Expected for W24

Airfield Projects	Terminal/Pier Projects
Apron 5H	T2 Central Search Upgrade
Critical Taxiway North	T1 & T2 HBS
Foxtrot Inner Rehabilitation (Pier 1)	Campus Road/External Roads – Phase 2
South Perimeter Road	Pier 100 GSE EV charging
Runway 16/34 LVP	

Source: Dublin Airport

Draft Decision

- 3.8 Our Draft Decision is to roll forward all airfield parameters from W23 to W24, while updating the stand count to align with that of S24. While the Coordination Committee ultimately voted in favour of ‘*considering*’ additional runway

capacity, it was agreed that this would be subject to modelling and further review by the Committee. However, as outlined in paragraph 2.12, in light of the 32mppa Conditions, Dublin Airport had already confirmed that it would make no such proposal, and in the absence of any such proposal, there was nothing to be modelled. There is, of course, no time to undertake such an assessment now ahead of the W24 capacity declaration deadline. In the ongoing absence of any specific proposal for increased runway capacity, any modelling of that proposal, or sufficient time for the modelling of any such proposals to be carried out, we propose to roll forward the runway parameters.

- 3.9 In recent capacity declarations, we have sought to take account of the potential constraining factor represented by Condition 5 of the North Runway planning permission.⁴ This condition gives rise to complex questions of planning law, EU law, and international law, and is currently the subject of High Court proceedings to which the IAA is a notice party. In August 2023, daa obtained leave to apply for judicial review of Fingal County Council's enforcement notice (issued on 28 July 2023) in relation to alleged non-compliance by daa with Condition 5. A stay on the enforcement notice was also granted. The hearing commenced before the High Court on 12 March. On 13 March, with the consent of all parties, the proceedings were adjourned to 24 June 2024, with a view to the Court being updated on that date in relation to An Bord Pleanála's decision regarding the introduction of a new noise quota count system to replace Condition 5. The stay on the enforcement notice remains in place.
- 3.10 Thus, with any clarification of this matter still pending, and consistent with each declaration since S22, we propose no changes to the R60 limits in the night hours relative to those which were in place prior to completion of the North Runway. This again means that no capacity has been added between 2300 and 0700 local time since completion of construction of the North Runway, meaning that the North Runway cannot lead to more flights in this period than were previously possible under the single Runway 28L based capacity declaration.

Parking Stands

- 3.11 We propose to retain the hard constraint on stands, while updating the stand count to take account of any changes to stand availability in the various apron areas, as set out in the Appendix.

⁴ See, in particular, section 3 of the S23 Declaration: [cp5-2022-final-decision-on-summer-2023-coordination-parametersf238415a-5893-4288-8556-8a4bb98220bf.pdf](https://www.iaa.ie/cp5-2022-final-decision-on-summer-2023-coordination-parametersf238415a-5893-4288-8556-8a4bb98220bf.pdf) (iaa.ie)

4. Terminal Building Coordination Parameters

- 4.1 We propose to roll forward the W23 rolling hourly Passenger Terminal Buildings (PTB) limits, which are set out in Table 4.1, to the W24 season.
- 4.2 We also maintain the peak hourly load factor assumptions of 85% for scheduled services, and 95% for charter services. We also propose to maintain the referral parameters in relation to Terminal 2 check-in desks 1 to 28, and the US Preclearance facility, as per the W23 capacity declaration.

Table 4.1: Proposed hourly Terminal Limits – W24

	Departures	Arrivals
Terminal 1	3,700	3,550
Terminal 2	3,700	3,050

Source: IAA

- 4.3 To take account of the relevant constraint represented by the 32mppa Conditions, we also propose to include a seasonal seat-cap-based capacity parameter for terminals 1 and 2, estimated so as to align with an annualised combined capacity limit of 32mppa.

Proposed Hourly Limits

- 4.4 No proposal was made for any changes to the PTB hourly limits.

Proposed Referral Limits

- 4.5 No proposal was made for any changes to the referral parameters in relation to Terminal 2 check-in desks or US Preclearance.

Seasonal Terminal Seat Capacity Constraint

- 4.6 While the majority advice of the Coordination Committee is that we should await further clarification on the precise meaning and effect of the 32mppa Conditions, we note that Dublin Airport, the owner of the relevant planning permissions, does not agree with this position. In that regard, while Dublin Airport has submitted an application to Fingal County Council to increase this capacity constraint to 40mppa, Dublin Airport has now acknowledged that a final decision on this application is unlikely to be available in 2024 or 2025. We note that, in 2023 and 2024 to-date, use of the existing capacity by airlines has also trended above the most recent forecasts of the IAA, of December 2022, and of Dublin Airport (of November 2023).
- 4.7 Unlike Condition 5 of the North Runway Planning Permission, the 32mppa Conditions and/or their enforceability has not been challenged by Dublin Airport, nor credibly challenged/disputed by another interested party. Further, and also unlike Condition 5, we do not consider the 32mppa Conditions to be so vague and imprecise as to require a series of further judgements by the IAA as to their meaning and effect, in order to be reasonably converted into coordination parameters. In this case, there are a number of different, but

individually specific, interpretations available for the purpose of estimating seasonal capacity parameters.

- 4.8 As regards the current disagreement over the meaning and effect of the 32mppa Conditions, since our most recent (S24) capacity declaration, as part of a Request for Further Information dated 16 February 2024 in the context of Dublin Airport's application to (amongst other things) increase the 32mppa constraint, Fingal County Council has provided an interpretation which appears to differ from that taken by Dublin Airport over the last number of years. Dublin Airport has subsequently, in March, provided a further response in support of its interpretation of how the annual terminal capacity should be assessed for the purposes of the 32mppa Conditions. Aer Lingus has, in correspondence to the IAA, put forward its own different interpretation. That interpretation is, in essence, that the 32mppa Conditions encompass only origin and destination passenger capacity. This interpretation has received the support of other airlines too.
- 4.9 We have previously set out in detail (in the context of Condition 5 of the North Runway planning permission) that it is not for the IAA to decide on the precise meaning and effect of ambiguous or disputed planning conditions, or what constitutes a material deviation from such conditions.⁵ The correct interpretation of a grant of planning permission is a matter of law to be determined by objective interpretation, and may ultimately be decided only by a court.
- 4.10 We agree with Dublin Airport that, for the purposes of the W24 capacity declaration, the existence of different possible interpretations of the 32mppa Conditions does not provide a basis not to reflect the constraint in the declared capacity at all. On any of the suggested interpretations, we consider that, based on current data and traffic forecasts, an annualised capacity of 32mppa is likely to become a limiting constraint on demand by, at the latest, 2025. Thus, on any of the posited interpretations, it appears to us to be necessary to reflect the limitation on capacity which is set out in the 32mppa Conditions in the capacity declaration for W24, a season which will conclude in March 2025.
- 4.11 We therefore propose not to follow the majority advice of the Coordination Committee, but rather to follow the position Dublin Airport supported in the voting, and implement a seasonal seat cap for the W24 season. We agree, in principle, with the view expressed by Dublin Airport in relation to point 1 of the voting, as regards taking account of the 32mppa Conditions in the W24 declaration. However, we note that, having proposed a Local Guideline and set out its view that passenger growth in the terminals needs to '*stall*', Dublin Airport, in its comments in the Coordination Committee advice letter, now appears to suggest that it has no position on whether any particular measure is, or is not, warranted to assist it in achieving compliance with the 32mppa Conditions. As noted above, Dublin Airport has made no proposal on the specifics of any such measure.
- 4.12 In that context, we have developed our own estimate of an appropriate seat cap parameter for W24, based on an objective analysis of the possibilities of

⁵ See S23 capacity decision, section 3.

accommodating the air traffic, subject to the constraint on terminal capacity set out in the 32mppa Conditions. We assume a seasonal average Load Factor for W24 in line with the outturn W23 Load Factor, at just under 81%. We propose a seasonal split in line with the outturn split in passenger numbers between S23 and W23. This implies an allocation of the capacity limit to the winter season of 34.7%.⁶ We assume a similar proportion of passengers not using the capacity of Terminal 1 or Terminal 2 as was reported by Dublin Airport for 2023 (4.8%). This results in a Passenger Air Traffic Movement (PATM) seat cap of 14,405,737 seats for the W24 season at Dublin Airport.

- 4.13 The proposed PATM seat parameter is a seasonal limit applying to all passenger services using Terminal 1 or Terminal 2. An individual airline seasonal quota would not be applied. Rather, the total seasonal limit applies to all users. Slots returned will include the seats assigned to that slot at the time of return to the pool. These seats would be made available to other users, as long as the slot request does not exceed the PATM seat parameter.
- 4.14 Operations not using the passenger capacity of Terminal 1 or Terminal 2 would not be limited by the PATM seat cap. Most notably for the W24 season, this means that cargo and General Aviation (GA) operations would not be limited by it, in the latter case because they enter via gateposts or the Platinum Services terminal, rather than terminals 1 or 2. In the case of GA, this will be kept under review for future seasons pending the outcome of the disagreement over the meaning and effect of the 32mppa Conditions. We note that, in any event, the question is of limited materiality in the context of the volume of GA passengers, of which there were less than 18,000 in 2023.
- 4.15 We do not agree with certain claims made by Dublin Airport in the Coordination Committee advice letter, most notably that '*it is a matter for the IAA to determine the appropriate actions to comply with the 32m annual passenger terminal cap*', and various similar statements. The IAA is not responsible for the enforcement of, or compliance with, the 32mppa Conditions, nor for deciding how they ought to be interpreted. It is for daa, as the owner of the relevant planning permissions and as the entity proceeding with development in accordance with those permissions, to determine the appropriate actions to comply with conditions attached to those permissions.
- 4.16 In that regard, we note that the wording of the 32mppa Conditions provides for a limitation on annual '*capacity*'. The IAA can declare limits on the terminal capacity accordingly, as we propose to do for W24, but this is not the same as determining the final result in terms of passenger throughput. The final result in terms of actual passenger throughput is not determined by the IAA, but rather is determined by the decisions of the airlines operating at Dublin Airport, who sell seats to passengers. For the avoidance of any potential doubt, the IAA cannot '*ensure*' the delivery of any specific outturn passenger throughput number over a given year, if the 32mppa Conditions are to be interpreted to relate to outturn throughput, rather than capacity. In simple terms, the capacity determination process can control the number of aircraft movements for which

⁶ Both W23 and W24 are seasons of 153 day duration.

slots are allocated, but not how many passengers are on each of those aircraft.

Draft Decision on Terminal Capacity Parameters

- 4.17 We propose to roll forward the hourly PTB limits from the W23 season. We also propose to maintain the hourly peak load factor assumption of 85% for scheduled services, and 95% for charter services. We propose to maintain the referral parameters in relation to Terminal 2 check-in desks 1 to 28, and US Preclearance as per the W23 capacity.
- 4.18 We propose a full-season PATM seat capacity parameter of 14,405,737 for the W24 season, which is necessary to properly take account of the capacity constraint provided for by the 32mppa Conditions. We note that the total incoming historic seat count from W23 is just under 14.3m seats. Consequently, this seat cap of 14.4m seats would be sufficient to allow the full allocation of historic slot entitlements arising from W23.

5. Appendix: Proposed Winter 2024 Coordination Parameters

The Irish Aviation Authority proposes the following scheduling limits for the Winter 2024 season at Dublin Airport.

Runway Scheduling Parameters:

Runway Hourly Limits			
Time UTC	Arrivals Limit	Departures Limit	Total Limit
0000	23	23	32
0100	23	23	32
0200	23	23	32
0300	23	23	32
0400	23	23	32
0500	23	25	32
0600	23	35	40
0700	21	35	46
0800	25	24	45
0900	24	25	42
1000	25	25	43
1100	28	28	50
1200	28	28	49
1300	25	28	45
1400	25	25	42
1500	23	27	43
1600	24	26	46
1700	26	28	49
1800	26	27	46
1900	24	25	40
2000	24	24	39
2100	25	23	39
2200	32	23	42
2300	23	23	32
Totals	589	619	970

Maximum number of movements per 10 minute period- Dual runway operations	
Maximum Total	13
Maximum Arrivals	6
Maximum Departures	7

Maximum number of movements per 10 minute period- Single runway operations (2300-0659)	
Maximum Total	9
Maximum Arrivals	6
Maximum Departures	6*
Exception: Maximum Departure Limit is 7 movements at 0600, 0610, 0620, 0630, 0640, 0650	

Passenger Terminal Parameters (hourly):

	Departures Hourly Limit	Arrivals Hourly Limit
Terminal 1	3,700	3,550
Terminal 2	3,700	3,050

Notes:

- 1) The hourly limit for passengers is rolled every 10 minutes.
- 2) Load factors of 85% are applied to Scheduled services for Terminal 1.
- 3) Load factors of 85% are applied to Scheduled services for Terminal 2.
- 4) Load factors of 95% are applied for Chartered services for both Terminal 1 and Terminal 2.

Passenger Terminal Parameters (seasonal):

	PATM Seat Capacity
Terminal 1 and Terminal 2 combined	14,405,737
Service type codes not using the capacity of Terminal 1 or Terminal 2: General Aviation (D), Special (FAA/Government) (E), Cargo Scheduled (F), Crew Training (other than GABA operators) (K), Air Ambulance (U), Military (W), Technical stop (X).	

Notes:

- 1) A total seasonal limit applies to all service type codes other than those listed above as not using the capacity of Terminal 1 or Terminal 2. An individual airline seasonal quota is not applied.
- 2) Slots returned must include the seats assigned to that slot at the time of return to the pool.
- 3) Slots returned will be made available to other users, provided the slot request does not exceed the PATM seat parameter.

Stand Parameters:

	GA		Non-Turnaround		Turnaround Stands								All
	W.A.N	W.A.S	Total	5G	MRO	P1	P2	P3	P4	S.A	Triangle	Total	Total
Contact						23	11	11	21	9		75	75
Remote	8	16	24	15	6	3					4	28	52
All	8	16	24	15	6	26	11	11	21	9	4	103	127

Note: The table represents NBE stand capacity.

Area	Constraint
Stands	Where demand for stands exceeds supply based on coordination allocation, flights to be referred to Dublin Airport for detailed assessment.

Referral Parameters:

Area	Flag
T2 Check-in Desks 1-28 (T2 Operators excluding EI)	Demand exceeds 28 desks
US Preclearance	New flights and schedule changes

Coordination Committee Voting Summary

Member	Votes	Voting Point 1	Voting Point 2	Voting Point 3	Voting Point 4	Voting Point 5	Voting Point 6
Ryanair	449	Agree	Disagree	Disagree	Agree	Agree	Disagree
Delta	9	Agree	Disagree	Disagree	Agree	Agree	Disagree
Air France	10	Agree	Disagree	Disagree	Agree	Agree	Disagree
KLM	15	Agree	Disagree	Disagree	Agree	Agree	Agree
Aer Lingus	275	Agree	Disagree	Disagree	Agree	Agree	Agree
Swiss	8	Agree	Agree	Agree	Agree	Agree	Agree
Emerald	92	Agree	Disagree	Disagree	Agree	Agree	Agree
American Airlines	9	Agree	Disagree	Disagree	Agree	Agree	Agree
United	10	Agree	Disagree	Disagree	Agree	Agree	Agree
British Airways CF	19	Agree	Disagree	Disagree	Agree	Agree	Agree
Air Canada	4	Agree	Disagree	Disagree	Agree	Agree	Agree
City Flyer	15	Agree	Disagree	Disagree	Agree	Agree	Agree
TUI	3	Disagree	Agree	Agree	Agree	Disagree	Agree
Sun Express	1	Abstain	Disagree	Agree	Agree	Agree	Disagree
Luxair	3	Abstain	Abstain	Abstain	Agree	Agree	Agree
UPS	7	Abstain	Abstain	Abstain	Agree	Agree	Abstain
AirNav Ireland	20	Abstain	Abstain	Abstain	Abstain	Agree	Abstain
IATA	10	Agree	Disagree	Disagree	Agree	Agree	Agree
daa	40	Disagree	Agree	Agree	Agree	Disagree	Agree
Result		Agree	Disagree	Disagree	Agree	Agree	Agree
% of total votes		93%	92%	92%	98%	96%	50%