

Dear Commission

I wish to count on the Draft Determination on the following headings:

1. The traffic forecasts do not correlate well with GDP; based on the total number of passengers for 2018 at 31.5 million, the forecast used in the Determination provide for an annual growth rate in 2019 and 2020 of 3.33% p.a. Yet, the growth in 2019 over 2018 is already between 6 and 7%;
2. While there is a description of the capital investment programme at Heathrow, Paris (ADP) and Brussels, in the Steer report, there are no comparators provided as to the level of passenger charges at these airports when compared either to each other or to Dublin;
3. While the Steer report differentiates between Dublin Airport and Heathrow in the type of predominant airlines (Heathrow = Full Service) and Dublin a combination of low-cost, charter and value airlines, there is no evidence that the requirements for passenger service differ in any way - particularly in them provision of safety of operational environment and aviation security;
4. The proposal to extend passenger gates at the South and North Aprons in Dublin shall only further add to airfield congestion and additional safety risk. This is evidenced by the increased number of taxiway and runway incursions in Dublin since September 2018;
5. The airport (Dublin) cannot expand passenger numbers safely within the existing campus, and needs a broader core infrastructure development, which shall have to be fully funded.

This is an outline, for which I should be prepared to develop.

Donal Lamont