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Irish Aviation Authority  
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21 September 2023

***Reference: Draft Decision on Summer 2024 Coordination Parameters at Dublin Airport***

Dear Adrian,

Aer Lingus welcomes the opportunity to respond to the Draft Decision on the Summer 2024 Coordination parameters at Dublin Airport proposed by the Irish Aviation Authority (IAA) on 08 September 2023. For the reasons outlined below, Aer Lingus disagrees with certain aspects of the IAA's draft decision with respect to the proposed increases to the Dublin Airport runway parameters and urges the IAA to re-evaluate its declaration in this regard.

In its response to both the Winter 2023 and Summer 2023 declarations, Aer Lingus as the hub operator of Dublin Airport emphasised that the opening of the North Runway was a very welcome development for all. However, the real benefits of this new infrastructure could only be realised once the supporting infrastructure and resources are in place. Over the course of the Summer 2023 season, it has become clear that the supporting resources are not in place to allow for the potential of North Runway to be realised. It is therefore surprising that the IAA has overlooked these shortcomings and proceeded to declare an enhanced capacity declaration, particularly in the morning departure wave.

Aer Lingus also wishes to advise the IAA that its comments included with its voting document/ballot were not included in the formal advice passed to the IAA by the Chairman/Secretary of the Coordination Committee (CC). That document explained why we could not support additional runway capacity in the 0600z hour. It appears that the IAA was not fully informed of Aer Lingus' view and therefore did not take that into consideration when making its draft decision. Our position is summarised below, and we request that the IAA re-evaluate their declaration for Summer 2024 considering this information.

Aer Lingus notes that AirNav Ireland, in its role as air navigation service provider (ANSP), surprisingly abstained from voting on new runway limits for S24. This is despite AirNav Ireland being responsible for the operation and performance of the runways.

In their presentation to the CC providing an overview of the morning performance at DUB with both runways in use, AirNav Ireland illustrated that on only 6 occasions over the 2-month sample period (27 June to 24 August 2023), departures exceeded 35/hour in the peak 0600z

hour with a maximum of 38/hour achieved on one signal day (17 August 2023). AirNav commented that it was almost a lucky confluence of events that allowed them to achieve this level (good weather, favourable departure routings, aircraft type mix and the crews being very familiar with DUB procedures). Certainly, achieving that output is far from the norm. This informative insight influenced our perspective and it is surprising that the IAA did not take this into account when making its draft decision.

Declaring capacity at this level will increase delays for all departing flights in the 0600 and subsequent hours. Moreover, Aer Lingus has concerns with the accuracy of the modelling that was carried out for the proposed capacity levels for Summer 2024. In its modelling for the Summer 2023 process, Egis projected that departure taxi times in the 06z hour would peak at 18 minutes with a declaration of 37/hour (an increase from 17 minutes in Summer 2022 with 35/hour). It has become apparent though in the modelling exercises undertaken for Summer 2024 that the actual peak for Summer 2023 in the 06z hour with 37/hour is 21 minutes.

Under the IAA proposal for Summer 2024, the Egis data suggests that morning peak departure taxi time increases to almost 23 minutes. Based upon the Egis data, this is an increase of almost 30% since Summer 2022 (17:41 in the model) despite a new runway being introduced. This clearly demonstrates that the supporting infrastructure is not yet in place to support this level of movement growth on the runway in the mornings.

A further consequence of this increase in taxi times for the first morning departure wave for based aircraft will be rotational delays throughout the operating day with aircraft arriving unnecessarily later in the evening.

Aer Lingus can only support capacity increases when there is evidence that the resources are in place to support the infrastructure.

Regarding the terminal building parameters, Aer Lingus supports the proposal to maintain current limits.

Aer Lingus notes the IAA's comments in relation to the wholly unsatisfactory situation concerning Condition 5. While we are in general agreement with the IAA continuing the approach adopted in previous decisions, we do not accept that an application of Condition 5 could result in Aer Lingus being unable to operate certain allocated slots (whether under Article 10.4(b) of the Slot Regulation or otherwise). We fully reserve our rights in this regard.

Regards,



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Steve Ronald

Director Schedules Planning and Alliances