

Dr Adrian Corcoran
Commission for Aviation Regulation
3rd Floor, Alexandra House
Earlsfort Terrace
Dublin 2
D02 W773

27 April 2023

RE: Commission Paper 1/2023 14 April 2023, Draft Decision on Winter 2023 Coordination Parameters at Dublin Airport

Dear Adrian,

Aer Lingus welcomes the opportunity to respond to the Draft Decision on the Winter 2023 Coordination Parameters at Dublin Airport issued by CAR on 14 April. Aer Lingus disagrees with certain aspects of CAR's draft decision with respect to the proposed increases to the Dublin Airport runway parameters for the Winter 2023 season and requests CAR to amend its final decision. Consistent with our views expressed in the Summer 2023 declaration, Aer Lingus cannot endorse any increase in runway capacity in general unless the required supporting infrastructure and resources are in place to underpin it.

In our [response](#) to the Summer 2023 declaration, Aer Lingus as a hub operator at Dublin Airport emphasised that the opening of the North Runway was a welcome development for the consumer and the Irish economy. However, the real benefits of the new runway can only be delivered if the enabling infrastructure and resources are in place. It is clear to Aer Lingus that such supporting resources are not yet in place to allow the full potential of this new infrastructure to be realised.

Despite the North Runway operating hours being 09:00 to 18:00 local every day the CAR's draft decision declares new capacity daily between 07:00 and 08:59 and in the evenings. This decision is presumably on the hope that the runway will be open from 07:00 until late night by next winter. This same approach was taken for the Summer 2023 declaration, and new slots have been allocated to the airlines at times when the new runway is not operational. As volumes grow during the summer this will result in delays, queues and disruption for passengers.

During the Coordination Committee meetings held on 15 March and 27 March, the IAA, in its role as Air Navigation Service Provider¹, chose not to comment or commit to the committee on its capability to increase the operating hours of the North Runway in line with the capacity declaration, and Dublin Airport merely expressed a belief that runway hours might be extended by Winter 2023.

In just the opening month Summer 2023 to date, insufficient air traffic management resources have had the unprecedented result of the Dublin airfield being closed to all traffic

¹ [To be known as AirNav Ireland from end April 2023](#)

on three occasions². This does not bode well for operating hours of the Northern Runway being extended later in the summer. Until operations are established on the new runway outside the current 0900 to 1800 (local) hours, it is inappropriate to declare new capacity.

Aer Lingus disagrees with the CAR's assertion that its decision can be based on a favourable comparison of modelled delays between the declared capacities for Summer 2020 and Summer 2023. There is no real-world experience to validate the assertion. The Covid pandemic meant that only a fraction of the originally planned flights operated in Summer 2020 and Summer 2023 capacity is yet to peak.

It is disappointing that the CAR dismisses these constraints and proposes to recklessly declare additional capacity in the hope that the runway will be open. A prudent approach that does not risk burdening passengers with unnecessary delays would be to wait until the runway is fully open and operations are established.

Regarding the terminal building parameters, Aer Lingus supports the proposal to maintain the current limits. It is too early in the deployment of the new C3 scanning machines in the security search areas to fully understand the processing and capacity benefits. We note the CAR's prudent approach in this regard.

Yours sincerely,

Eoin Doyle

Eoin Doyle

² 28 March, 09 April, 21 April