

# Capital Investment Programme 2027 - 2031

Response to IFS Assessment and  
Draft IAA Determination



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# 1. Introduction and Overall Position

Dublin Airport welcomes the detailed assessment undertaken by the Irish Aviation Authority (IAA), supported by the Independent Fund Surveyor (IFS) and To70, of the Capital Investment Programme for the 2027–2031 regulatory period.

CIP27 has been developed to provide the infrastructure required to accommodate passenger and operational growth during the regulatory period, while enabling the timely delivery of the pier, gate and stand capacity required over the longer term. The programme also includes investment to improve the passenger experience, strengthen safety and security, increase the resilience of existing assets and support Dublin Airport’s sustainability objectives.

In developing CIP27, careful consideration has been given to cost efficiency, project maturity, deliverability, construction constraints and the need to minimise disruption within a complex and continuously operational airport environment. The programme includes projects at different stages of development and therefore incorporates a combination of Flexible, StageGate, Deliverable and Trigger mechanisms to ensure that investment progresses only when the need, scope, cost and delivery strategy have been sufficiently demonstrated.

Dublin Airport welcomes the IAA’s broad acceptance of the programme and its conclusion that the substantial majority of the proposed projects are consistent with the interests of current and future airport users. Dublin Airport also welcomes the IFS’s positive findings regarding the overall quality of the submission, the supporting cost plans, the optioneering undertaken and the efficiency of the proposed project scopes.

The IFS assessed approximately €5.428 billion of Dublin Airport’s €5.614 billion submission as efficient. The resulting adjustment of approximately €187 million, or 3.3% of the overall programme, demonstrates a high degree of alignment on the overall need, scope and cost of CIP27.

The IAA has provided either an allowance or a regulatory route to progression for all but one of the projects included in Dublin Airport’s final submission. The Remote Screening Centre is the only project for which neither an allowance nor an alternative regulatory route has been provided. Dublin Airport accepts the IAA’s comments and provides clarifications on the points raised in this document. However, as the remaining uncertainty relates primarily to the final scale and configuration rather than the underlying project objective or assessed cost efficiency, Dublin Airport considers that complete disallowance is disproportionate. A controlled StageGate route, supported by an operational trial and business case hold point, would provide appropriate protection for airport users while preserving a route to progress the project where justified by the evidence.

The remaining areas of difference do not represent a fundamental disagreement regarding the overall need for CIP27. They principally relate to:

- specific project cost, quantity and scope adjustments;



- the use of benchmark rates that may not fully reflect construction within a constrained and live airport environment;
- the treatment of operational, safety and resilience requirements;
- the asset lives applied to certain projects and cost categories;
- the transfer of security, retail and lounge costs into associated parent Airport Development projects;
- the proposed regulatory treatment of the Airfield Safety Projects and Capital Planning Studies programmes;
- category-level adjustments to the Asset Management and Commercial grouped allowances;
- the proposed portfolio-wide expenditure condition applying to Trigger A

Dublin Airport does not seek to challenge every IFS or IAA adjustment. Genuine formula errors, duplicated scope, reasonable quantity corrections and minor benchmarking differences can be accepted. For projects that remain at an early stage of development, certain cost and scope matters can also be appropriately reviewed as the design progresses through the StageGate process.

This response instead focuses on those areas where clarification, reconciliation or amendment is required because an adjustment may arise from a factual error, may not reflect the practical constraints of delivering works within a live airport, may remove scope required to achieve an operational, safety or resilience objective, may apply an inappropriate asset life, may duplicate a reduction made elsewhere in the regulatory model or may create uncertainty regarding the future remuneration of efficiently incurred expenditure.

Dublin Airport broadly supports the proposed inflation methodology, including the continued use of CPI indexation.

With regard to the CIP2020 Level 4 and 5 Office Upgrade project (CIP.20.07.10), Dublin Airport requested confirmation of the IAA's position. The StageGate decision stated that "Ahead of the next determination, we will assess the appropriate updated allowance, based on the evidence and positions put forward by the various parties."

Although the Draft Determination does not explicitly set out the IAA's position, the Excel financial model contains two apparently inconsistent entries. The Continuing Untriggered Allowances tab identifies the StageGate 0 allowance of €21.4 million, while the 2023–2026 Capex tab records the IFS-assessed and deemed efficient StageGate 1 allowance of €46.73 million.

This appendix therefore provides clarification and addresses the key IFS and stakeholder concerns, and sets out the project's criticality. It also explains why approval of the €46.73 million IFS assessed StageGate 1 allowance is required to enable the project to progress and asks the IAA to review and clarify its position.



Dublin Airport also welcomes the removal of the proposed linkage between the remuneration of the Northern Runway and any future decision regarding the potential decommissioning of Runway 16/34. No decision has been made on the future of Runway 16/34. Any decision will be subject to further technical, operational, safety and regulatory assessment during the 2027–2031 regulatory period. Removing the linkage is appropriate, as it allows the assessment of Runway 16/34 to progress on its merits without creating an unintended regulatory or remuneration risk.

Dublin Airport acknowledges the views raised in relation to the future development of the western campus and agrees with the IAA that airport capacity should be assessed by reference to individual processors, facilities and peak-period constraints, rather than through the application of a single annual passenger threshold. The ability of the airport to accommodate future growth will depend on how individual elements of the airport system perform as demand develops, together with the operational and infrastructure interventions available to address emerging constraints.

Dublin Airport has undertaken significant work to assess a range of long-term development scenarios against forecast demand, including masterplan options both with and without the retention of Runway 16/34 and the associated implications for future development of the airport. Pending the resolution of these longer-term strategic matters, CIP27 has been developed to address emerging capacity, resilience and asset-renewal requirements while preserving flexibility in relation to future development. Dublin Airport therefore agrees with the IAA that the investments proposed within CIP27 do not prejudice or foreclose future decisions regarding development of the western campus.

Dublin Airport's principal requests are that:

- The Remote Screening Centre is reinstated through a controlled StageGate route, supported by an operational trial and business case hold point.
- Terminal 1 Immigration Facility Optimisation is included as an untriggered StageGate project;
- Terminal 2 Immigration Facility Optimisation is included as an untriggered StageGate project;
- Terminal 1 Central Search Mezzanine Expansion and the Terminal 2 Check-in Hall Extension are included as StageGate and Trigger projects, providing a regulatory route to respond to localised capacity constraints where the need is subsequently demonstrated;
- the full IFS-assessed efficient Asset Management and Commercial grouped allowances are reinstated. If reduced opening allowances are retained, a clear prospective in-period adjustment mechanism should confirm the recoverability of efficient expenditure before material commitments are entered into;
- no additional category-level reduction is applied to the Sustainability group allowance, which is already substantially controlled through StageGate and project-specific Trigger mechanisms;



- the Airfield Safety Projects and Capital Planning Studies programmes revert to Flexible treatment, reflecting the discrete, responsive and evolving nature of the interventions and studies included within those programmes;
- the proposed portfolio-wide expenditure condition for Trigger A is removed, allowing remuneration to activate where the individual project has secured planning approval, completed the applicable StageGate process, received internal governance approval and commenced substantive construction.
- if an aggregate condition is retained, it should be materially reduced to a level that triggers are activated within the price cap where Dublin Airport is materially on track with its core untriggered capital delivery programme. Dublin Airport therefore proposes that the IAA's initial threshold of €570 million, equivalent to 110% of planned expenditure both including CIP2020 expenditure in process and the new CIP27 projects, be revised to €450 million, equivalent to 90% of planned expenditure.
- the identified project-specific cost, scope and asset-life adjustments are reconsidered where they do not adequately reflect project requirements, current project cost composition or the practical constraints of undertaking works within a live airport environment;
- a fully reconciled cost plan is provided for all security, retail and lounge scope transferred into associated parent Airport Development projects, confirming that the relevant costs have been accurately reallocated and that the overall efficient allowance has neither been understated nor duplicated.
- To review and confirmed its position on the regulatory treatment for CIP2020 project Level 4 and 5 Office Upgrade (CIP.20.07.10).

These amendments would preserve the IAA's objective of protecting current and future airport users from inefficient or premature expenditure, while providing Dublin Airport with the regulatory certainty and flexibility required to develop and deliver necessary and efficient investment.

The proposed approach would retain appropriate independent assessment, StageGate scrutiny, airline and user consultation, project-specific Trigger conditions, capital reporting and end-of-period reconciliation. At the same time, it would avoid creating unnecessary barriers to the progression, financing and timely delivery of projects that the IAA and IFS have already accepted in principle as necessary and efficient.



## 2. Remote Screening Centre

The Remote Screening Centre is the only project in the submitted CIP27 programme for which the IAA has provided neither a capital allowance nor an alternative regulatory route to progression. The Draft Determination identifies uncertainty regarding the project's operating objective, the supporting trial evidence, the proposed scale of up to 60 screening positions, the relationship between the anticipated productivity benefits and operating expenditure assumptions, and the potential impact of the Automated Prohibited Item Detection System (APIDS).

Dublin Airport accepts that the final operating model, scale and implementation strategy should be supported by appropriate trial evidence before the full investment is committed. However, the issues raised by the IAA relate primarily to the detailed operating model and final number of screening positions, rather than to the underlying need for the project or the efficiency of its proposed scope and cost. The IFS did not identify any inefficient scope or cost within the proposal.

Complete disallowance is therefore disproportionate. It removes the regulatory route through which Dublin Airport could undertake the necessary trial and, where supported by the evidence, implement the project.

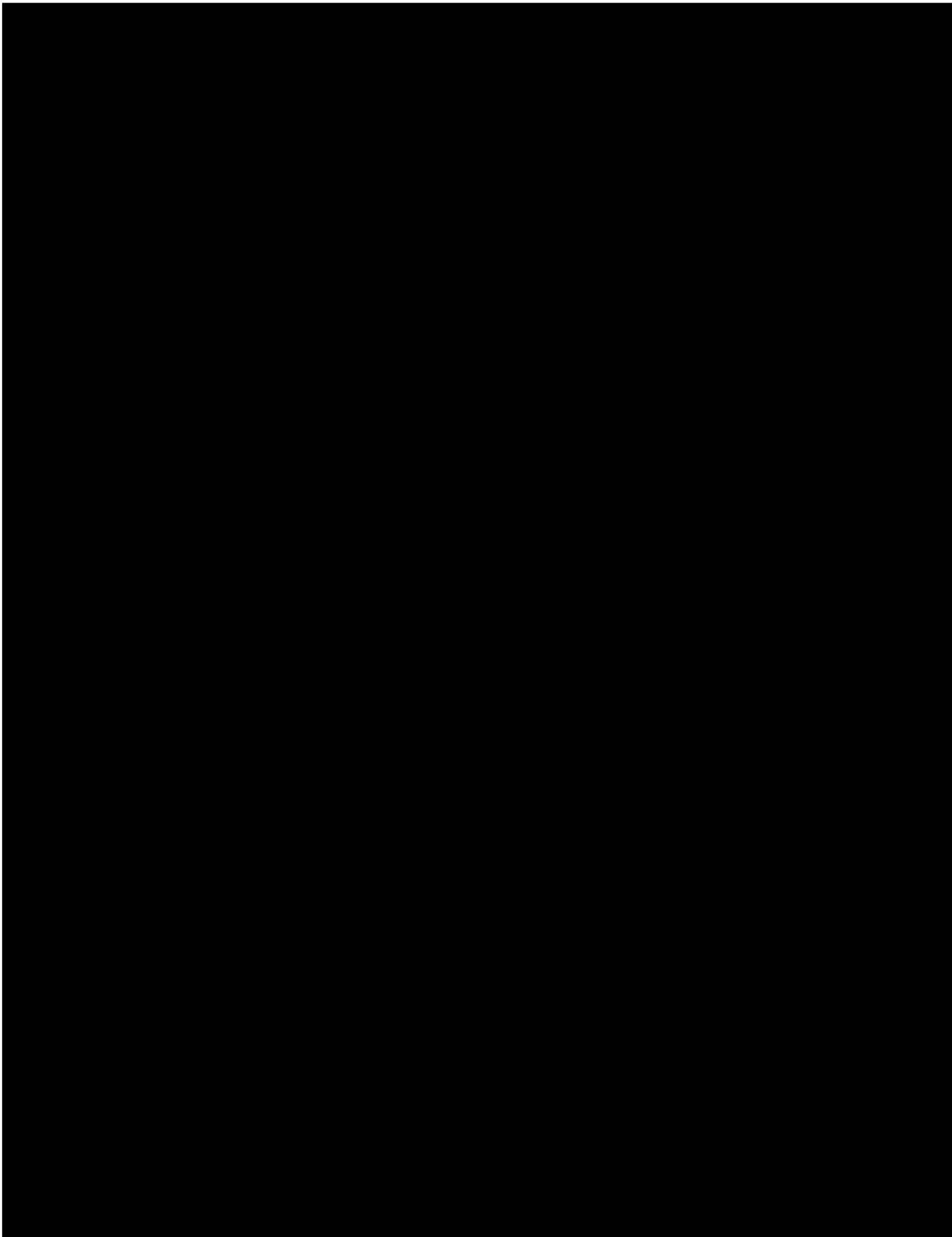
### Project Objective and Security Benefits

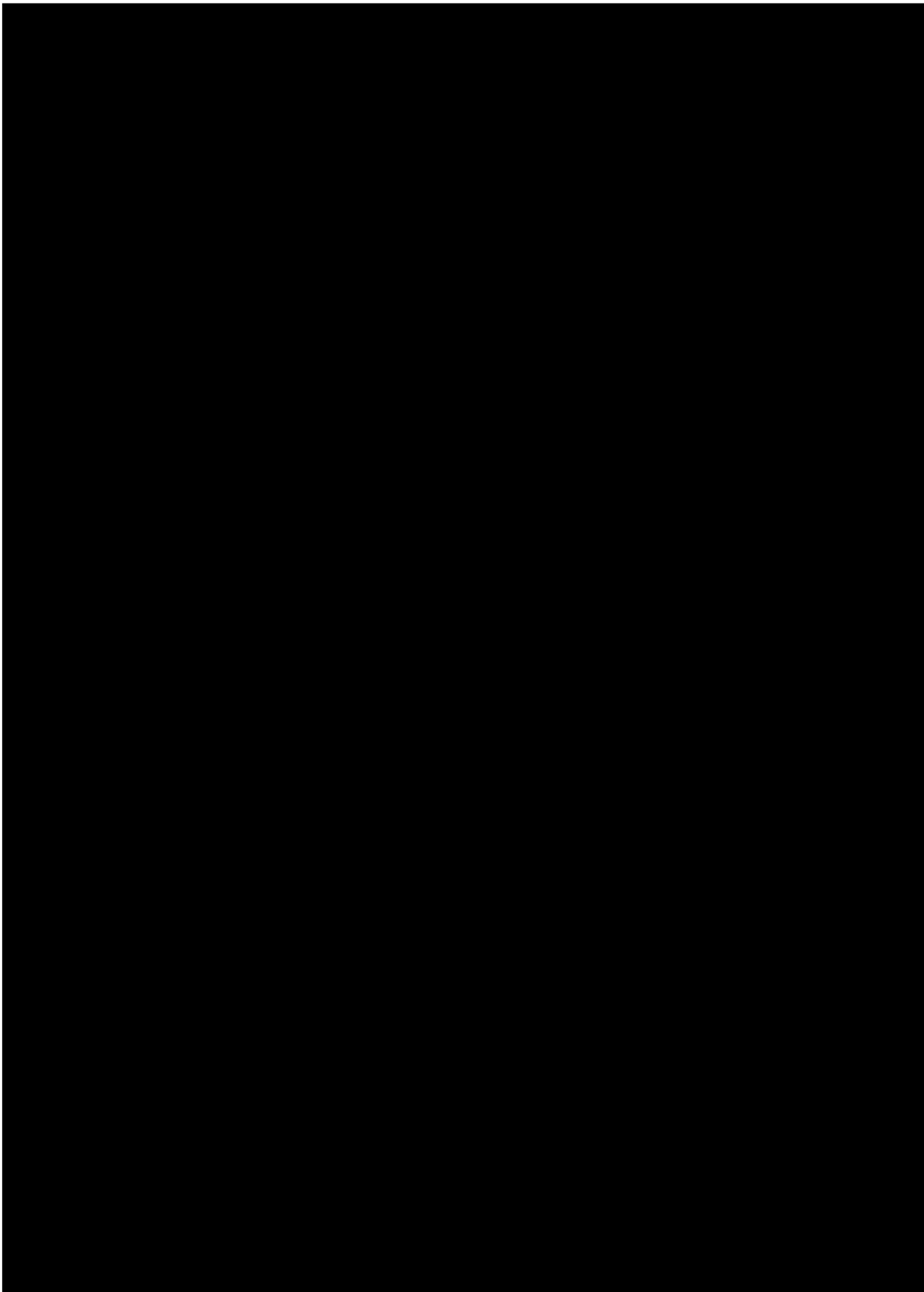
The primary objective of the Remote Screening Centre is to improve threat detection and maintain compliance with security regulations. From the perspective of Security Operations, this is the principal purpose of the project. It is not intended to deliver a reduction in Aviation Security Unit (ASU) headcount.

Dublin Airport notes the IAA's observations regarding comparable facilities at other airports. However, evidence from the same reference sites indicates that a dedicated remote screening environment, focused solely on image analysis and threat detection, can improve screening performance for the following reasons:

- A quieter and more controlled working environment: Screeners currently operate within high-volume passenger areas, where noise from passengers, equipment and surrounding activity can affect concentration. Locating the screening function away from the Central Search Areas would substantially reduce these distractions and provide an environment in which image analysis and threat identification are the sole focus.
- Greater opportunity for screener specialisation: A dedicated remote screening facility would allow Dublin Airport to consider the specialist operating models adopted at other airports. This could support the development of an expert cohort of screeners, with the potential to improve detection rates and performance in covert testing assessments.







### APIDS and Image-on-Alarm Screening

Dublin Airport does not consider that potential future developments in APIDS provide a sufficiently certain basis on which to reduce the proposed screening capacity:

- APIDS has been approved by CEPT and included in the CEP register. However, there is currently no regulatory approval permitting Dublin Airport to implement image-on-alarm screening. Dublin Airport must therefore continue to review every image, irrespective of the algorithm's assessment of whether it contains a potential threat.
- Even if future EU regulations permit image-on-alarm screening, the IAA would not be obliged to approve the use of this APIDS functionality in Ireland.

Dublin Airport cannot therefore base its screening capacity plans on a future regulatory or operational change that remains uncertain, particularly given the limited margins within the existing screening operation. Capacity must be planned on the basis of the current regulatory requirements and the continued need to review all images.

### Proposed StageGate Controls

Before progressing to full implementation, Dublin Airport would provide the following information to the IAA through the StageGate process:

- the proposed layout and operating concept;
- the trial methodology and results;
- the proposed implementation programme; and
- reconciliation with the operating expenditure assumptions included in the regulatory model.

The allowance would be drawn down only to the extent supported by the trial findings and the approved business case. The final scale, equipment mix and phasing could therefore be adjusted to reflect the evidence obtained.

Dublin Airport requests that the project be reinstated through a controlled regulatory route. StageGate treatment, incorporating an operational trial hold point, would be the most proportionate approach. The remaining uncertainty relates to the project's final scale and configuration, rather than to its underlying security objective or need.

This approach would protect airport users from premature or excessive expenditure while retaining a route to deliver a security initiative that the IFS has assessed as efficient.

### Operating Expenditure

Dublin Airport also wishes to clarify the anticipated increase in operating expenditure associated with the project. As the project is driven by security performance rather than staffing efficiency, no reduction in ASU headcount has been assumed.



The operating expenditure included in Dublin Airport's submission relates to the standard repair and maintenance rates for the Smiths remote screening stations and the energy required to operate the proposed 385 m<sup>2</sup> facility. The estimated increase in annual operating expenditure is approximately €90,000, subject to final design and configuration.



### 3. Inflation Treatment

Dublin Airport notes the IAA's proposal to continue setting the price cap in real terms, with annual indexation by reference to the Consumer Price Index (CPI). The proposed methodology uses the ten-month CPI proxy for the historic element of the ex-ante adjustment, together with the latest available inflation forecast. A subsequent z-factor adjustment would address differences between forecast and outturn inflation.

Dublin Airport supports the objective of preserving the purchasing power of the regulatory settlement while avoiding material windfall gains or losses arising from differences between forecast and actual inflation. Accordingly, Dublin Airport does not propose to challenge the continued use of CPI.

The CIP27 project cost estimates were prepared in nominal terms using construction-inflation assumptions informed by the Society of Chartered Surveyors Ireland Tender Price Index. Dublin Airport welcomes the IFS's conclusion that these assumptions are broadly consistent with prevailing infrastructure-market trends and its decision to incorporate them within the assessed efficient project costs.

For the purposes of the price-cap model, the IAA proposes to convert the nominal IFS-assessed allowances into March 2026 real prices. Under this approach, the forecast construction inflation expected to be recovered through annual CPI indexation is removed, with the remaining differential retained as residual real construction inflation.

Dublin Airport accepts this approach in principle as a reasonable means of avoiding double-counting, provided it is applied consistently and preserves the full value of the IFS-assessed efficient nominal allowance for each project. Dublin Airport notes that the Draft Determination financial model, particularly the 'IFS cost allowances' tab, already provides visibility of the CPI and residual real construction-inflation assumptions applied. This transparency should be retained and, where necessary, further clarified in the Final Determination and accompanying financial model.



## 4. Project Adjustments and Reconciliation

The Draft Determination incorporates the IFS adjustments alongside a number of further changes made by the IAA. These include changes to regulatory classifications, asset lives and trigger treatment. The IAA has also transferred elements of security, retail and lounge expenditure into associated triggered Airport Development projects and applied separate category level deliverability adjustments to certain grouped allowances.

Dublin Airport does not seek to challenge every adjustment. Genuine formula errors, duplicated scope, reasonable quantity corrections and minor benchmarking differences can be accepted. For projects at an early stage of development, some cost and scope matters can also be addressed appropriately through design development and StageGate.

However, a number of adjustments require clarification or reconsideration because they:

- arise from factual errors or the interpretation of the Schedule of Rates
- rely on benchmarks that do not reflect construction within a live airport
- remove operational, safety or resilience scope required to achieve the project objective
- apply generic rates to work involving restricted access, night working, phased cutovers and live services
- apply an asset life that does not reflect the current project cost mix
- duplicate a reduction already reflected elsewhere in the regulatory model
- create uncertainty regarding when efficiently incurred expenditure will be remunerated

The following identifies the projects for which clarification or reconsideration is requested. It sets out the relevant IFS or IAA adjustment, the reason for Dublin Airport's concern and the preferred resolution in each case in some instances from a regulatory treatment perspective only.

### CIP27.01.02A – Charging Network

The IFS states that the scope of the project will likely meet the intended objectives. The IFS has reviewed the cost estimate provided by Dublin Airport and the majority of the rates included in the estimate are reasonable. In its assessment, the IFS has reduced the rates included for LV and comms cabling (internal) and LV and comms cabling (external), as the rates included in Dublin Airport's cost estimate are higher than the IFS would expect. Dublin Airport has reviewed the IFS position and records the following clarification.

#### 1. LV and Comms Cabling (Internal)

There is a typo error in the Schedule of Rates for LV and comms cable, whereby the €10/m rate applies only to communications cabling. The appropriate rate for LV cabling is approximately €20/m. Accordingly, the combined rate of €30/m adopted in the cost plan is considered reasonable, and no adjustment to the cost estimate is recommended.



## 2. LV and Comms Cabling (External)

External works require larger LV cables, which justifies the higher rate. The €50/m rate included in the cost plan is considered appropriate and is supported by extensive benchmarking against similar projects. The IFS should review this item and reinstate the original rate.

### CIP27.01.06B – Noise Insulation Scheme

The IFS states that the project scope can fully meet the project objectives. However, based on the historical uptake rates of noise insulations schemes, the IFS assess that an uptake rate of 100% is not efficient and an uptake rate of 90% would be more appropriate. The IFS has therefore adjusted the scope in the cost assessment. In its assessment, the IFS has reduced the number of RSIGS grants to reflect the above scope review. Dublin Airport has also assumed that all applicants would receive the maximum grant of €30,000. However, the IFS consider this assumption likely to be inefficient, as Dublin Airport defines it as an “upper-bound assumption”. While no adjustment has been made to the grant value in the IFS cost assessment at this stage, they will review this further ahead of the Final Determination.

Dublin Airport has reviewed the IFS position and records the following observation. Dublin Airport confirms that the proposed reduction in RSIGS grant coverage to 90%, representing 990 properties, is acceptable.

However, it is important to note that this position may change in light of the latest IA Draft Regulatory Decision, which proposes a noise insulation grant of up to €40,000 per property and identifies 2,025 eligible properties, including 1058 properties currently within the RSIGS that would transition to the new scheme. As a result, 2,025 properties would be eligible for grants of up to €40,000, while the remaining 42 properties would continue to be eligible for grants of up to €30,000.

This change would increase the overall cost of the insulation programme and should be taken into account in the final assessment and associated funding assumptions. Allowing the project to progress through the StageGate process will enable the final scheme costs and the number of applicants to be established and reported definitively.

### CIP27.02.02A – Pier 1 East

The IAA has accepted Dublin Airport’s proposed StageGate treatment for Pier 1 East and its proposal to divide the project into two distinct Trigger elements. The first Trigger would relate to the commencement and completion of Module 1, while the second would relate to the commencement and completion of Modules 2 and 3.

Dublin Airport agrees with this approach, as it reflects the proposed phasing and delivery strategy for the project. Module 1 is already progressing through the planning process and is intended to be delivered as the initial early phase. Modules 2 and 3 would then be delivered as a subsequent phase, once the necessary planning approvals have been secured and the existing MRO hangars have been relocated. The use of separate Trigger elements therefore appropriately recognises the different delivery timelines, dependencies and levels of project maturity associated with each phase.



However, the IAA has applied an asset life of 32 years, compared with the 25-year asset life proposed by Dublin Airport. Dublin Airport considers that the 25-year asset life should be retained. This is consistent with the treatment applied to comparable pier developments, including Pier 5 and the Pier 2 and Pier 3 bolt-on projects. These projects have similar operational functions, construction characteristics and patterns of use. Applying a longer asset life to Pier 1 East would therefore create an inconsistency in the regulatory treatment of comparable passenger pier infrastructure without a clear technical or operational basis.

#### **CIP27.02.04 – Terminal 2 CBP and Transfer Extension**

The IFS concludes that the project objectives of increasing US pre-clearance and transfer capacity, while reducing passenger queue times, can be fully achieved through the proposed scope. However, the project was rated red because the IFS identified potential double-counting with CIP27.05.05 Security Operations Systems and Equipment in relation to eight e-gates and five one-way corridors. The IFS also recommended that Dublin Airport examine alternative scope options and undertake further design refinement through the StageGate process to ensure that the final design is appropriately optimised.

Dublin Airport supports the IAA's proposal to divide the project into two distinct Trigger elements. The first Trigger would relate to the commencement, completion and operation of the initial two-storey phase. The second Trigger would apply to the subsequent delivery of the third-floor element, including the expanded transfer facility.

This approach appropriately reflects the proposed delivery strategy and the differing levels of maturity of the two phases. The initial two-storey phase already has planning approval and is expected to commence on site shortly. The third-floor element would progress only once the required additional planning permission has been secured. The use of separate Trigger elements therefore recognises the different planning dependencies, delivery programmes and commencement dates associated with each phase.

The IFS reviewed Dublin Airport's cost estimate and adjusted the quantities for structural, façade and partition elements, together with demolition works to the existing building, based on its assessment of the drawings provided. These adjustments account for the principal identified cost variances. The IFS also revised the allowances for FFandE, wayfinding and various mechanical and electrical services based on its measurement of the new-build and existing floor areas.

The costs associated with the eight e-gates and five one-way corridors were omitted following Dublin Airport's confirmation that these items were also included within CIP27.05.05. This consequentially reduced the allowances for percentage-based cost items. However, Dublin Airport notes that, at a strategic level, the IAA has added back costs relating to elements of CIP25.05.05 that form part of the parent Trigger project. The final treatment should therefore be reviewed to ensure that the allocation of these costs is consistent across the relevant projects and that the overall efficient cost allowance is not inadvertently understated.



### CIP27.02.08 – Wide Body Engine Test Facility

The IFS concludes that the scope will meet the outputs required of the project, and considers the scope to be efficient, although suggests the refinement of the fence length and alignment. The IFS has reviewed the cost estimate provided by Dublin Airport and at present it agrees with Dublin Airport's estimate for the scope of works required.

Dublin Airport has reviewed the IFS position and records the following clarification. The orientation and the length of the Jet Blast Fence has been designed and modelled based on the surrounding taxiways and available access to the Engine Testing Site, aircraft geometry, wing tip clearance and positioning of the aircraft based on the wind direction in order to allow the highest possible utilisation of the site (over 95%) and to protect the operational areas around the Engine Testing Site. The design will further be refined during the project phase but we do not expect the Jet Blast Fencing length's to be reduced.

### CIP27.02.14 – Integrated Transport Hub

The IFS states that the ITH development meets its objectives of increasing bus capacity and supporting sustainable transport, but is likely to deliver only partial improvements to passenger experience, particularly for T2 users. Key concerns relate to uncertain integration with future T1 developments and the efficiency of elements with short asset lives, which may require redesign or interim solutions. As a result, proceeding should ideally be aligned with a confirmed decision on the future of T1.

The IFS assessment has adjusted quantities for ground floor slab, roof structure, external canopy, façade elements (curtain wall / spandrel panels / alumn louvre), and granite paving, based on the drawings provided, resulting in the cost variances. IFS has also reduced the cost for external glazed canopy, link bridge, timber wall cladding, and fire and lightning protection. As a result of these changes, the cost allowances in the IFS assessment for percentage-based cost items have also reduced.

Dublin Airport has reviewed the IFS position and notes that Terminal 2 passengers will access the ITH via an elevated walkway connecting the Metro Station to the T2 MSCP. This element forms part of the Metro Station scope, which may not have been clear in our submission.

With regard to coordination with the T1 Development, the final solution is still evolving and requires considerable stakeholder consultation and agreement. We are continuing to work through these matters and have included projects within CIP27 to progress the T1 Redevelopment study. Through the StageGate process, we will provide further details on how the ITH aligns with the potential T1 redevelopment options.

### CIP27.02.15 – Consolidated Security and Screening Centre

The IFS states that the proposed project scope can meet the project objectives, however, no justification for the required capacity and size of the proposed Screening Centre. The IFS therefore recommends conducting further studies to determine the future capacity requirements and the size of the facility needed before carrying out its design. Due to the uncertainty regarding the required size



of the Consolidated Security and Screening Centre, the IFS proposes the inclusion of the project in the StageGate process.

The IFS has reviewed the cost estimate provided by Dublin Airport and the majority of the rates included in the estimate are reasonable. In its assessment, the IFS has reduced the rate for ground floor slab construction to align the rate with the rates table information provided by Dublin Airport. IFS has also reduced the quantities for column casings and PV panels area, as the estimated figures from Dublin Airport are considered to be excessive. Dublin Airport has reviewed the IFS position and records the following observations:

### 1. Ground Floor Slab

This is composite rate derived from the components noted in activity description with rates sourced from CIP27 Schedule of Rates. Therefore, no cost reduction is recommended.

### 2. Column Casings

The quantities have been reviewed and are considered reasonable with the rates used benchmarked from comparable works at Manchester Airport. Accordingly, no adjustment is recommended.

### 3. PV Panels

The quantity of PV panels is based on the project specification to meet minimum airport sustainability requirements and targets. The rates used are based on live cost data sourced from recent comparable projects at Dublin Airport. No adjustment is recommended

## CIP27.02.18 – Existing Pier 1 West Extension

The IFS states that the project is considered efficient because it meets the brief of providing 2 additional gates/hold rooms to improve operational efficiency of gate to stand passenger handling. The variances between Dublin Airport and the IFS are mainly driven by allowance for diversion of utilities, fire protection paint to first floor steel frames, FFandE to first floor area and VCCs, and LV main and submain. Due to the rate reduction, the other percentage items have resulted in being overall lower. Dublin Airport has reviewed the IFS position and records the following clarification and observation. The cost reductions proposed by the IFS have been reviewed as follows:

### 1. Allowance for Diversion of Utilities in the VCC/Apron Area

The allowance has been reviewed and is considered reasonable given the early stage of design and the known presence of extensive utilities in this apron area. Accordingly, no adjustment is recommended.

### 2. Fire Protection Paint

The reduction in quantity arising from the correction of a formula error is considered appropriate, resulting in a cost reduction of €664,000.

### 3. FF&E to First Floor Area and VCCs

The adopted average rate of €140/m<sup>2</sup> is considered reasonable and is based on Manchester Airport Terminal equivalent rate for Furniture, Fittings and Equipment. No adjustment is recommended.



#### 4. LV Main and Submain

A rate anomaly was identified during our review. Its correction supports a cost reduction of €444,000.

#### CIP27.02.22 – Dual Passenger Boarding Bridge to Stand 315C

The IFS states that the project delivers the intended functions in an efficient way. The project, however, does not sufficiently address the related WB capacity restriction of the associated gates 304 and 305. The project would benefit from further design. The suggested alternative scope which allows boarding from the existing Pier 3 as well as from the Pier 3 Bolt-On Extension in the future should be considered and evaluated. The IFS has reviewed the cost estimate provided by Dublin Airport and the majority of the rates included in the estimate are reasonable. In its assessment, the IFS has reduced the rate included for the passenger boarding bridges as the rate included in Dublin Airport's estimate is a lot higher than we would expect. The IFS has also removed the allowance for 2 FEGP units due to the double counting identified with project CIP27.02.35 Fixed Electrical Ground Power. The IFS did not make any changes to percentage allowances within this section of Dublin Airport's estimate, but the reduction in the rate for the passenger boarding bridges resulted in a reduction in the overall allowances for out of hours working, builders work in connection with services, and testing and commissioning.

Dublin Airport has reviewed the IFS position and records the following clarification and observation. The cost reductions proposed by the IFS have been reviewed as follows:

##### 1. Passenger Boarding Bridge

The specification aligns with the existing PBB installation at the airport. The quotation received is based on the incumbent supplier's H2 2025 rates, and has been provided to the IAA/IFS for reference. Accordingly, no adjustment is recommended. [REDACTED]

##### 2. Fixed Ground Power Units

The omission of 2 no. FFGP units is considered appropriate. This correction results in a cost reduction of €518,000.

#### CIP27.02.30 – Airfield Safety Projects

The IFS considers that despite the limited room for efficiencies on regulatory and safety driven projects, the provision of paved shoulders for the full length of Taxiway W4 may be excessive. Moreover, the existing Hot Fire Training Facility may be a hotspot for PFAS and Dublin Airport will need to demonstrate a clear understanding of this. Associated costs have now been consolidated within the StageGate project CIP27.20.50 – PFAS on Construction Sites. The IFS has reviewed the cost estimate provided by Dublin Airport and the majority of the rates included in the estimate are reasonable. In its assessment, the IFS has reduced the rates or allowances included for Taxiway - Secondary ducts for signs, North Runway - Cabling for lights and data pits, North Runway - Traffic lights, North Runway - Audible alarm system for traffic lights, and All Areas - Ground Penetrating Radar and EML Surveys on high risk environments. The IFS has also adjusted the provision for new shoulder pavement in Taxi W4 to account for grass shoulders.



Dublin Airport has reviewed the IFS position and records the following clarification and observation. The cost reductions proposed by the IFS have been reviewed as follows:

**1. Taxiway – Allowance for secondary ducts for signs**

The rate €1,000/m includes for grinding, excavation, disposal, base lay, duct lay fill surround, make good of taxiway and connection to mains supply and thus is considered reasonable. Accordingly, no adjustment is recommended.

**2. North Runway – Allowance for external data connections**

The allowance has been reviewed and is considered appropriate based on similar projects at the airport. No adjustment is recommended.

**3. North Runway – Allowance for cabling from circuits to electrical pit**

The allowance has been reviewed and is considered appropriate. No adjustment is recommended.

**4. North Runway – Allowance for Audible alarm speaker, audible alarm system and manual override switch and installation**

The allowance has been reviewed and is considered appropriate. No adjustment is recommended.

**5. All Areas – Allowance for Ground Penetrating Radar and EML surveys on high-risk environments**

The allowance has been reviewed and is considered reasonable. No adjustment is recommended.

**6. Taxiway W4 paved shoulders**

Dublin Airport has undertaken a detailed pre-tender estimates as well as received 2 no tender returns for the Taxiway W1 rehabilitation, which scope includes shoulders; 2 options were evaluated:

**Option 1** - considers the provision of hard (3m wide) and soft shoulders (4.5m wide) to be constructed on both side of the widened taxiway with the inclusion of new proprietary precast concrete slot drains at the edges of the hard shoulders on both sides.

**Option 2** - considers the provision of soft shoulders (7.5m wide) only on both sides of the widened taxiway with the inclusion of new proprietary precast concrete slot drains on one side only.

The difference in the Pre-tender estimate between Option 1 (hard shoulders) and Option 2 (soft shoulders) is █████, vs. Tender Median Value difference of █████, which is negligible, considering the safety benefits of the hard shoulders. Paved taxiway shoulders reduce the likelihood and consequences of aircraft excursions, prevent FOD generation arising from jet blast and engine suction, improve operational resilience during adverse weather, and provide a stable load-bearing area adjacent to aircraft manoeuvring surfaces. The resulting reduction in operational risk supports compliance with the safety objectives of CS-ADR-DSN and ICAO Annex 14.



Dublin Airport therefore refuses the reduction of allowance based on the scope reduction from paved/ hard to grass/ soft shoulders. This item should be reviewed again by the IFS and the paved shoulders included in the final cost allowance.

The IAA has proposed that the Airfield Safety Projects programme should be subject to the StageGate process. Dublin Airport proposed that the programme should be treated as a flexible allowance. Both Dublin Airport and the IAA have applied a 15-year asset life.

Dublin Airport considers that flexible treatment should be retained. The programme is made up of several discrete safety-related projects rather than one integrated scheme. Applying StageGate to the overall programme could require each individual intervention to progress through a separate regulatory assessment, creating disproportionate administration and potentially delaying delivery.

The nature of airfield safety investment also means that individual projects may need to be accelerated in response to emerging safety risks, regulatory requirements or operational events. Dublin Airport requires sufficient flexibility to prioritise and progress these interventions at the appropriate pace while remaining within the overall approved allowance. Flexible treatment would provide this capability without reducing the requirement for appropriate internal governance, safety assurance or cost control.

#### **CIP27.02.43 – PBZ Relocation**

The IAA has accepted Dublin Airport's proposed StageGate treatment for the PBZ Relocation project but has applied an asset life of 28 years. Dublin Airport proposed an asset life of 25 years.

Dublin Airport considers that the 25-year asset life should be maintained. This is consistent with the asset lives applied to comparable airport development projects, including Pier 5 and the Pier 2 and Pier 3 bolt-on schemes. The PBZ Relocation project forms part of the wider passenger-processing and pier infrastructure environment and is expected to be subject to similar operational demands, future changes in passenger-processing requirements and potential redevelopment pressures. A 25-year asset life therefore provides a more consistent and realistic basis for regulatory remuneration. Applying a separate 28-year life would introduce unnecessary inconsistency between assets of a comparable nature without a clear justification for the different treatment.

#### **CIP27.03.04 – Airline Lounges**

The IFS considers the project efficient and capable of meeting its objectives of providing new and upgraded commercial lounges. Its review found that most of the rates included in Dublin Airport's cost estimate were reasonable. However, the IFS reduced the rates applied to windows and external doors, floor, wall and ceiling finishes, and electrical installations to align them with the rates-table information provided by Dublin Airport.

The IAA has accepted Dublin Airport's proposed flexible regulatory treatment for the Airline Lounges programme. Dublin Airport also notes that the costs associated with new lounges within Pier 1 East, the CBP Extension and Pier 3 have been removed from this flexible commercial programme and



transferred to the relevant parent airport development projects. These projects are generally subject to project-specific Trigger and StageGate arrangements.

Dublin Airport considers this treatment acceptable in principle, provided that the associated costs have been transferred accurately and consistently between the relevant project allowances. Dublin Airport therefore requests that the IAA and IFS provide a detailed breakdown and reconciliation of the adjustments made. This should confirm the costs removed from the Airline Lounges programme, the corresponding amounts added to each parent project and that the overall efficient allowance has neither been understated nor duplicated.

The IAA has proposed a 12-year asset life for the remaining Airline Lounges programme, compared with the seven-year asset life proposed by Dublin Airport. Dublin Airport considers that the proposed seven-year asset life should be retained. Airline lounges are intensively used and generally operate at high levels of utilisation to maximise commercial revenue, including through dynamic pricing. This results in significant wear to furniture, fixtures, fittings and internal finishes.

Operational experience indicates that refurbishment is typically required approximately every seven years to maintain the quality of the facility and the level of passenger experience expected from a premium lounge product. Lounge design, airline requirements and customer expectations also evolve relatively quickly, requiring facilities to be regularly refreshed to remain competitive and aligned with industry standards.

A 12-year asset life would therefore not reflect the practical refurbishment cycle or the commercial and operational requirements of these facilities. Dublin Airport requests that the IFS and IAA reconsider the asset-life assumption and its consequential impact on the final regulatory funding treatment.

#### **CIP27.03.06 – Platinum Services Collinstown House Upgrade**

The IAA has accepted Dublin Airport's proposed flexible treatment for the Platinum Services Collinstown House Upgrade but has applied a 10-year asset life. Dublin Airport proposed a seven-year asset life.

Dublin Airport considers that the seven-year asset life should be maintained. Platinum Services facilities are heavily used and are required to provide a consistently high-quality premium passenger experience. Furniture, fittings and finishes are therefore subject to significant wear, while the appearance and specification of the facilities must continue to meet changing customer expectations and premium-service standards. Dublin Airport's operational experience indicates that refurbishment is typically required after approximately seven years to maintain the required product quality, modern appearance and commercial competitiveness. The proposed seven-year life is also consistent with the treatment sought for airline lounges, which have similar utilisation patterns and refurbishment requirements. A 10-year life would therefore overstate the practical useful life of the fit-out elements.



### **CIP27.03.10A - ARI Retail Projects**

Dublin Airport notes that the IAA has determined that certain cost elements are more appropriately included within the relevant parent Airport Development projects in which the retail provision will ultimately be installed. Accordingly, the associated funding has been removed from this project and transferred to the relevant parent projects, which are generally subject to StageGate and project-specific Trigger arrangements.

Dublin Airport does not object to this treatment in principle. However, Dublin Airport requests that the IAA and IFS provide a fully reconciled cost plan identifying the scope and costs removed from this project and the corresponding amounts added to each parent project. This is necessary to confirm that the strategic reallocation has been applied consistently and has not resulted in any unintended reduction in the overall efficient cost allowance

### **CIP27.04.05 – Airfield Maintenance Base Improvements**

The IFS states that the project is expected to meet the scope objectives by delivering the facility as outlined and is considered efficient. The IFS has reviewed the cost estimate provided by Dublin Airport and the majority of the rates included in the estimate are reasonable. In its assessment, the IFS has reduced the quantity for extra over allowance for contaminated soil disposal, as IFS considers that the estimated quantity allowed by Dublin Airport is excessive when compared to the provisions for the same scope in other projects in the CIP27 submission. Those projects have included a quantity for contaminated soil disposal that is 15% of the total quantity of excavated material. The IFS has applied this percentage allowance to the excavated material quantity included in Dublin Airport's cost estimate.

Dublin Airport has reviewed the IFS position and records the following observation. The IFS has assessed the extra-over allowance for contaminated soil disposal at 15% of the total disposal volume, consistent with the assumptions applied on other CIP27 projects. This differs from the 100% allowance included in the current estimate.

The assumption of 100% contaminated soil disposal is conservative. Accordingly, we agree to align this assumption with those adopted in comparable cost estimates, and the cost reduction identified by the IFS is deemed acceptable.

### **CIP27.04.16 – Terminals and Piers LV Electrical Upgrade**

The IFS states that the project should fulfil its objectives to set out a phased programme to modernise low-voltage electrical systems by replacing outdated assets with compliant and energy-efficient infrastructure. Although the scope is still high level and requires further development, it provides a suitable foundation for effective project delivery and is considered efficient. The IFS has reviewed the cost estimate provided by Dublin Airport and the majority of the rates included in the estimate are reasonable. In its assessment, the IFS has reduced the rate included for dismantling and disposal of existing services to align with the rate within the rates table information provided by Dublin Airport. This has consequently reduced the allowances for out of hours working and Builder's work in connection.



Dublin Airport has reviewed the IFS position and records the following clarification, observation or challenge. The dismantling and disposal of existing services assets is a complex and high-risk activity that requires careful planning. Due to the need to maintain normal operations, all works must be carried out during night shifts. The dismantling works includes surveys, enabling works, disconnection, dismantling, removal, safe disposal, and daily site setup and clearance. Works must also be carefully phased and sequenced to avoid disruption and meet health and safety requirements. These constraints create significant logistical complexity, including limited working hours, repeated mobilisation, and increased site management.

Based on similar projects which entail the installation of new circuits followed by the removal of redundant circuit, these factors typically add around 20% to the total works cost. Reducing this allowance to 6% will not adequately cover the cost of removal activity and would introduce significant budget risk and will lead to cost overruns. It is therefore recommended to maintain the current cost allowance at a level consistent with established benchmarks to ensure a reliable cost estimate.

The IFS assessment considers the rate for dismantling and disposal of services. Within Dublin Airport's Core Asset Replacement Programme, this activity forms part of the controlled removal of critical infrastructure in a constrained, live aviation environment where safety, operational resilience, and business continuity must be maintained at all times.

Dublin airport would like to provide some context to challenge the rates comparison as we feel that these rates may not accurately reflect projects of a similar nature, complexity, or operating conditions. The projects referenced in this submission (Asset Management Core Projects and IFS Submission Reference CIP27.04.16 Terminals and Piers LV, CIP27.04.22 Potable and Foul Water Upgrades, CIP.04.02.23 Terminals and Piers M&E, Notes 6.206, 6.282, 6.291) differ from conventional refurbishment works. Unlike typical fit-outs or office renovations where services can be isolated and replaced in vacant or partially occupied spaces these works involve replacing critical infrastructure within live airport systems that must remain operational throughout.

The scale, complexity, and environment materially impact productivity and cost. Services are located in congested ceiling voids, plantrooms, risers, tunnels, baggage areas, back-of-house spaces, and public zones. Access is constrained and often requires specialist equipment, temporary works, out-of-hours working, and coordination with airport operations, resulting in significantly reduced working space compared to standard commercial environments. The majority of these projects are in T1 8 bay and Pier 3 (dating from 1972) and Pier 2 dating from the 1960s in some areas.

Delivery requires a phased and controlled approach. Existing systems must remain operational until replacement assets are installed, commissioned, and proven. This involves temporary supplies, diversions, staged cutovers, multiple isolations, and progressive removal, with dismantling forming one component of a wider delivery process.



Productivity assumptions typically applied to benchmark rates are not achievable under these conditions. Access is governed by operational requirements, security controls, passenger and airline activity, baggage operations, and airside restrictions, limiting available working time.

For these reasons, direct comparison with rates derived from office refurbishments or general building works is not appropriate. The airport environment introduces distinct constraints in terms of access, phasing, and maintaining live operations.

The rates submitted by Dublin Airport reflect these conditions and are based on recent experience of delivering infrastructure replacement within a live airport environment, providing a more representative basis for the cost of the works. This item should be reviewed again by the IFS where it affects efficient scope delivery, operational constraints, benchmark rate selection, asset life assumptions, quantity assumptions or final funding treatment.

#### **CIP27.04.17 – Primary Standby Power Generation Upgrade**

The IFS assesses that the project is efficient in delivering the project requirements for the Primary Power Generations upgrades. The IFS has reviewed the cost estimate provided by Dublin Airport and the majority of the rates included in the estimate are reasonable. In its assessment, the IFS has reduced the quantity for the 100mm 4-way electrical duct, as IFS would consider the estimated quantity allowed by Dublin Airport is excessive when compared with the quantity of cabling included in the estimate.

Dublin Airport has reviewed the IFS position and notes the identified discrepancy between the cable and duct quantities. The cable length is estimated at 6,000 m (based on four generators at 1.5 km each), while the duct has been assumed at 3.0 km per run, totalling 12,000 m, which appears overstated. Aligning the duct length with the cable assumption (1.5 km per generator) is considered appropriate in this instance, as the current 3 km allowance per generator is excessive.

#### **CIP27.04.19 – Campus Buildings M&E and Life Safety Systems**

The IFS states that the project should be capable of fulfilling its objectives, despite the very high-level scope. The IFS assesses that this project should be efficient in delivering the requirements. However, it is possible that the scopes will change significantly once full and detailed condition surveys of the Buildings and M&E equipment have been carried out.

The IFS has reviewed the cost estimate provided by Dublin Airport and the majority of the rates included in the estimate are reasonable. In its assessment, the IFS has reduced the rates for Heat Source; allow for replacement or refurbishment of boiler, and Electrical Installations; allow for stripping out and disposal of existing services, to align those rates with the Schedule of Rates information provided by Dublin Airport.

Dublin Airport has reviewed the IFS position and records the following clarification and observation. Dublin Airport respectfully does not agree that a 25-year asset life assumption is appropriate for LED lighting systems.



The Airport has extensive experience operating LED lighting assets and has successfully maintained a number of installations in reliable service for over 12 years. Dublin Airport actively seeks to maximise asset life wherever practical and does not replace assets solely based on age.

However, a 25-year replacement cycle is considered excessive from an Asset Management and Whole Life Value (WLV) perspective. Industry LED life claims are generally based on lumen maintenance standards such as LM-80 and TM-21, which project the performance of LED light sources to an L70 threshold rather than the operational life of the complete luminaire system. These projections are based on controlled test conditions and should not be interpreted as a guaranteed asset life for lighting installations.

Dublin Airports primary position to defend against 25 Year Asset Life is that airport facilities are subject to changing operational requirements, evolving customer expectations, revised lighting standards and periodic changes in space utilisation. A 25-year replacement cycle would significantly reduce the Airport's ability to aDublin Airportt lighting systems to support these future operational changes.

In practice, the useful life of a lighting asset is determined by its drivers, control gear, emergency lighting components, communication interfaces, ongoing supportability and technological obsolescence, rather than by the LED chip itself. Industry experience indicates that electronic components and controls often determine the operational life of LED lighting systems. This is particularly relevant to what Dublin Airport refers to as 'catalogue' or 'standard' LED solutions.

Dublin Airport's approach is aligned with ISO55001 principles, lean maintenance practices and Whole Life Value decision-making. Whilst LED lighting delivers significant energy savings, the primary Whole Life Cost benefit realised by the Airport has been the substantial reduction in maintenance interventions, access requirements, operational disruption and lifecycle maintenance costs compared with legacy lighting technologies.

The Airport's investment assumptions are based on practical operating experience, maintainability, reliability and supportability.

The Dublin Airport Lighting Asset Design Policy has a clear requirement for a minimum 10-year warranty and 100,000-hour performance specification and reflects the level of performance that manufacturers are typically prepared to warrant and support, and therefore provides a prudent and evidence-based basis for long-term asset planning.

Accordingly, Dublin Airport considers that asset life assumptions should be based on practical operational performance, maintainability, reliability and future flexibility rather than theoretical maximum life projections. This approach is consistent with ISO55001's objective of optimising value from assets through an appropriate balance of performance, cost, risk and opportunity.

As such, Dublin Airport considers the originally proposed asset life of 15 years to be reasonable and requests that it be retained.



### CIP27.04.20 – Passenger Boarding Bridges and Fixed Electrical Ground Power Upgrades

The IFS states that the proposed scope of PBB and FEGP upgrades can meet the stated objectives and can generally be considered efficient. However, to improve the efficiency of the project, the IFS recommends removing the proposed new PBB at Pier 4, the upgrade of one PBB and two FEGP units at Pier 4, unless the CBP project (CIP27.02.04) is not approved as part of CIP27, and the upgrade of four PBBs and associated FEGP units at Pier 3.

The IFS has removed the items identified through its scope assessment from the cost estimate. It has also reduced the rate for the new PBB, as the rate included in Dublin Airport's estimate is higher than expected. In addition, the IFS has deducted the cost of site representatives overseeing the works at each gate and the allowance for Jet Dock materials and parts for the eight Pier 3 PBBs to avoid double counting. The IFS considers these costs to be covered by the preliminaries and other similar items within the estimate. The quantity allowed for moving PBBs onto and off the airside site has also been reduced, as the IFS considers Dublin Airport's allowance excessive.

Dublin Airport has reviewed the IFS position and records the following clarification and observation.

#### 1. Pier 4 scope (new PBB, upgrade PBB, and FEGP units)

The proposed new "rotational " Pier 4 PBB is fundamental to the efficient delivery of the Pier 4 PBB renovations. The suggestion to utilize existing "CBP area" PBBs that are potentially earmarked for removal as part of CBP expansion is not feasible for the following reasons.

Both PBBs serving "CBP area" stands have a maximum extended length of 29m which suits the bespoke stand arrangements at 409R and 409L. All remaining PBBs on Pier 4 have a maximum extended length of 43m allowing full MARS functionality.

In summary, the "CBP area" PBBs are too short for deployment on any other Pier 4 stand arrangement outside of their current designation. While we recognise potential efficiencies, we are against omitting this scope at this stage due to the above reasons.

#### 2. PBB rate reduction

The replacement rate proposed within the submission has been benchmarked against market rates by the current PBB supplier Oshkosh as recent as of November 2025. Dublin Airport believes this rate accurately reflects current market pricing for replacement of PBB units in line with the existing offering at Dublin Airport, aligned with existing specifications and therefore should not be reduced

#### 3. Site field representative costs

Given the complexity and operational environment, a dedicated allowance is appropriate. Removing this would likely transfer cost to project management and is not considered a duplication. We recommend retaining this provision.



#### 4. Jet Dock materials (Pier 3 refurbishment)

These costs relate to upgrading 8 existing PBBs to the required standard and form an integral part of the works. This is not double counting, and we do not recommend their removal.

#### 5. PBB move-in/move-out quantities

The inclusion of PBB upgrades within Pier 3 and 4 which might be subject to removal as part of both CBP expansion and Underpass projects we believe should remain. This is to fully mitigate against significant project delays and or cancellations. Any such delay would result in the existing PBBs remaining in service in their current condition and far beyond the expected service duration. Given the condition and age profile of both Pier 4 PBBs (structural corrosion) Pier 3 PBBs (40 year old), this represents a significant operational risk and should be recognised as such.

Quantities are based on proven delivery strategies from previous projects and reducing these allowances introduces delivery risk; therefore, we recommend maintaining the current allowance. This item should be reviewed again by the IFS where it affects efficient scope delivery, operational constraints, benchmark rate selection, asset life assumptions, quantity assumptions or final funding treatment.

#### CIP27.04.22 – Potable and Foul Water Upgrades

The IFS notes that the project information remains high-level, with part of the scope focused on validating the existing as-built records and developing a hydraulic model to define the final requirements. Subject to robust validation and modelling as the project progresses, the IFS considers that the scope can efficiently meet the stated project objectives.

The IFS reviewed Dublin Airport's cost estimate and found that most of the submitted rates were reasonable. However, it reduced the rates for copper pipe insulation across various pipe sizes and for the removal and disposal of existing water services and heat-pump installations, as these were considered higher than expected.

Dublin Airport has reviewed the IFS position and records the following clarification and observation. For reasons similar to those set out in response to CIP27.04.16 Terminal and Pier LV Electrical Upgrades, the submitted rates reflect the complexity of undertaking asset replacement within constrained, live airport environments.

The works require the controlled removal and replacement of critical infrastructure while maintaining passenger operations, safety, security, operational resilience and business continuity. They will be undertaken in congested and difficult-to-access locations, including ceiling voids, plantrooms, risers, tunnels, baggage areas, back-of-house accommodation and public areas, much of which forms part of older terminal and pier infrastructure.

Delivery will require phased installation, temporary services, diversions, staged isolations, controlled cutovers and out-of-hours working. These constraints materially reduce productivity compared with



conventional office refurbishment or general building projects and should be reflected in the benchmark rates applied.

The Dublin Airport rates are based on recent experience of delivering comparable infrastructure replacement projects within a live airport environment. As detailed surveys, development drawings and hydraulic modelling are still required to define the final scope and quantities, Dublin Airport requests that the IFS review the relevant rates and allowances again as the project progresses through the StageGate process, particularly where these affect efficient scope delivery, operational constraints, quantities or final funding treatment.

#### **CIP27.04.23 – Terminals and Piers M&E and Life Safety Systems**

The IFS states that the project scope remains at a high level but, once fully developed, should be capable of meeting the stated objectives. No concerns have been identified at this stage regarding the efficiency of the project. Following its review of Dublin Airport's submission, the IFS made only one adjustment, reducing the rate for stripping out and disposing of existing services.

Dublin Airport has reviewed the IFS position and notes that this activity involves more than the routine dismantling and disposal of services. Under Dublin Airport's Core Asset Replacement Programme, the works require the controlled removal of critical infrastructure within a constrained, live aviation environment. Safety, operational resilience and business continuity must be maintained throughout.

Dublin Airport's submitted rates reflect these delivery conditions and are based on recent experience of completing infrastructure replacement works within a live airport environment. They therefore provide a more representative basis for estimating the cost of the works. Dublin Airport requests that the IFS reconsider this adjustment and reinstate the original costs.

#### **CIP27.04.24 – Terminals and Piers HVAC Upgrade**

The IFS notes that the project scope remains at a high level but considers that, once fully developed, it should be capable of meeting the stated objectives efficiently. No concerns have been identified at this stage regarding the overall need for or efficiency of the project.

As no drawings were provided, the IFS assessment was limited to a review of the rates included in Dublin Airport's cost estimate. The only adjustment made was a reduction to the proposed ductwork replacement rates, which the IFS reduced by approximately 50%.

Dublin Airport has reviewed the IFS position and records the following observation. Dublin Airport does not consider that a 50% reduction in the ductwork replacement allowance adequately reflects the complexity and risk associated with replacing existing systems within an operational airport environment.

Unlike new-build installations, ductwork replacement requires detailed surveys, phased removal and installation, temporary arrangements and careful coordination with existing systems, including air-handling units and fan-coil units. The works must also accommodate restricted access, limited working



hours, repeated mobilisation, daily site clearance and the need to maintain safe and continuous airport operations. Existing building constraints can require shorter ductwork sections, additional joints, testing and commissioning, further reducing productivity compared with equivalent greenfield works.

For the same reasons as those identified in Dublin Airport's response to CIP27.04.23 Terminal and Piers M&E and Life Safety Systems, the proposed HVAC rates reflect the practical cost of delivering complex infrastructure retrofit works within an ageing and continuously operational airport estate. These works are affected by constrained service routes, congested ceiling voids, restricted plant space, legacy modifications and the need to integrate new systems into facilities that were not originally designed to accommodate modern centralised heating, cooling and ventilation infrastructure.

In many locations, distributed or localised solutions provide better whole-life value and present less operational and delivery risk than a centralised system. However, these solutions can require additional equipment, controls, service connections, commissioning activities and maintenance interfaces. The submitted rates are therefore based on Dublin Airport's experience of delivering comparable projects rather than on benchmark rates for conventional HVAC installations in modern or unoccupied buildings.

As the individual projects have not yet progressed to detailed design and the final engineering solutions remain to be defined, Dublin Airport requests that the original allowances be retained at this stage. The ductwork and HVAC rates should be reviewed again by the IFS as the scope develops, particularly where the applied assumptions affect efficient scope delivery, operational constraints, benchmark selection, quantities or final regulatory funding treatment.

#### **CIP27.04.26 – Baggage Handling System Terminal 2 Critical Asset Re-Life Programme**

The IFS states that the scope presented provides a reasonable basis for meeting the project objectives and for the efficient delivery of the BHS Terminal 2 Critical Asset Re-life Programme. However, the scope remains at a high level and requires substantial further design and development.

The IFS has reviewed Dublin Airport's cost estimate and considers the majority of the rates reasonable. However, it has reduced the percentage allowances for BHS integrator management and testing and commissioning, as these are higher than the IFS would expect.

Dublin Airport has reviewed the IFS position and provides the following clarification and observations. The allowance for BHS integrator management is based on recent project experience at Dublin Airport and has been benchmarked against comparable airport projects in the UK. The adopted rate is considered appropriate and consistent with industry standards.

The allowance reflects the complexity and coordination requirements associated with BHS projects. The integrator is responsible for managing interfaces across multiple disciplines, including mechanical and electrical installations, low- and high-level control systems, secondary steelwork, security systems, building services and associated builders' works. Extensive coordination is also required with civil and architectural packages, often within a live operational environment.



The works are further constrained by phasing requirements, operational limitations and stringent health and safety requirements. These factors increase the level of planning, supervision, coordination and risk management required. The current allowance is therefore considered justified. Reducing the integrator management rate would create a significant risk to the project budget, and Dublin Airport requests that the original allowance be reinstated.

The allowance for BHS testing and commissioning is also based on recent project experience at Dublin Airport and has been benchmarked against comparable airport projects in the UK. The adopted rate is considered consistent with industry standards. The allowance reflects the complexity of integrating and verifying multiple interfaces, including mechanical systems and low- and high-level controls. The testing and commissioning process must also confirm that the new and extended BHS infrastructure can operate safely and reliably with the existing live system.

This requires system validation, interface testing, performance trials and staged commissioning to confirm operational compatibility and reliability within an active airport environment.

The testing and commissioning allowance is therefore considered appropriate. Reducing it would create a significant risk to system performance, project delivery and the overall budget. Dublin Airport requests that the original allowance be reinstated.

#### **CIP27.04.27 – Baggage Handling System Efficiency and Resilience Upgrades**

The IFS considers that the scope presented in Dublin Airport's submission provides a reasonable basis for achieving the project objectives and developing an efficient delivery programme. However, as the project remains at an early planning stage, the scope will require further definition and development through the subsequent design phases.

The IFS reviewed Dublin Airport's cost estimate and found that most of the submitted rates were reasonable. However, it reduced the percentage allowance for baggage integrator management, as this was considered higher than expected. This adjustment also resulted in consequential reductions to the allowances for baggage integrator overheads and profit and out-of-hours working.

Dublin Airport has reviewed the IFS position and records the following clarification and observation. Dublin Airport considers that the proposed baggage integrator management allowance is appropriate and should be retained. The allowance is based on recent Dublin Airport project experience and has been benchmarked against comparable baggage projects at UK airports.

For the same reasons set out in Dublin Airport's response to CIP27.04.26 Baggage Handling Systems Terminal 2 Critical Asset Re-Life Programme, baggage integrator management involves extensive coordination across mechanical and electrical systems, controls, secondary steelwork, security systems, building services and associated architectural and civil works. These activities must be carefully planned and delivered within a live operational environment, with significant phasing, access, safety and business continuity constraints.



The associated testing and commissioning requirements are similarly complex, requiring comprehensive interface testing, system validation, performance trials and staged commissioning to ensure that new or upgraded infrastructure operates safely and reliably with the existing live baggage system.

The submitted allowances reflect the level of management, coordination, testing and risk control required to deliver these works successfully. Dublin Airport therefore requests that the baggage integrator management and associated allowances be retained at this stage and reviewed again by the IFS as the design develops, particularly where any adjustment could affect efficient scope delivery, operational constraints, benchmark selection, quantities or final regulatory funding treatment.

#### **CIP27.04.29 – Terminal Operational Improvements**

The IFS states that the scope should fulfil the project objectives by delivering the refurbishment of building finishes outlined. The IFS notes that they do not have any concerns with regard to the efficiency of the project. The IFS has reviewed the cost estimate provided by Dublin Airport and the majority of the rates and quantities included in the estimate are reasonable. In its assessment, the IFS has reduced the rates for the emergency exit lighting, electrical installations and fittings, furnishings and equipment as they are higher than the IFS would expect.

Dublin Airport has reviewed the IFS position and records the following observations. The cost reductions proposed by the IFS have been reviewed. The reductions related to emergency exit lighting and electrical installations are aligned with the Schedule of Rates and/or other comparable cost estimates; accordingly, these are considered acceptable. However, the remaining items, including FF&E, internal finishes, and services (excluding the electrical installation noted above), are based on various benchmark data and are considered reasonable.

Accordingly, the accepted reductions in construction cost (excluding main contractor preliminaries and fees) are:

1. Emergency exit lighting – €0.122m
2. Electrical installation – €0.055m

#### **CIP27.05.01 – Intrusion Detection System**

The IFS states that the information provided by Dublin Airport is high-level, the scope should fulfil the project objectives and offer a reasonable basis for an efficient delivery. The IFS has reviewed the cost estimate provided by Dublin Airport and the majority of the rates included in the estimate are reasonable. The variances between Dublin Airport and the IFS are mainly driven by reductions in rates for the perimeter intrusion detection radar, allowance for UPS install and connections and power connections. The IFS were unable to check the quantities included in the cost estimate due to lack of design information.



Dublin Airport has reviewed the IFS position and records the following clarification and observation.

#### 1. Perimeter Intrusion Detection Radar

[REDACTED]

#### 2. Allowance for UPS install and connections

[REDACTED]

#### CIP27.05.02 – Aviation Security Training Organisation Relocation

The IFS states that the project meets the scope objectives by delivering the facility as outlined. However, the basic sizing of the facility requires validation by Dublin Airport as evidence for the project's efficiency. The IFS has reviewed the cost estimate provided by Dublin Airport and the majority of the rates included in the estimate are reasonable. In its assessment, the IFS has only made minor reductions to the rates included for the water main infrastructure, water main isolation valve and bollards to align with the Schedule of Rates provided by Dublin Airport. The strip out allowance for M&E has also been removed as the IFS believes that these costs should be captured in other strip out costs.

Dublin Airport has reviewed the IFS position and records the following clarification, observation or challenge. The cost reductions proposed by the IFS have been reviewed. Reductions for the rates of the water main infrastructure, water main isolation valves, and bollards are consistent with the Schedule of Rates and are therefore considered acceptable.

The IFS has also removed the allowance for stripping out M&E services, on the basis that these costs are included within other strip-out items. However, the cost included under Item 7.1.1 – 'Allow for stripping out works' only covers finishes and loose furniture, and does not include M&E services. The allowance for M&E strip-out is based on benchmark data from Dublin Airport and is considered reasonable; accordingly, this allowance should be retained. Accordingly, the accepted reductions in construction cost (excluding main contractor preliminaries and fees) are:

#### 1. Water main infrastructure – €11k



2. Water main isolation valve – €6k
3. Bollards – €11k

This results in an overall reduction to the grand total cost of €70k (i.e. <1%). This item should be reviewed again by the IFS where it affects efficient scope delivery and final funding treatment.

#### **CIP27.05.03 – Damage by Vehicle Risk Mitigation Programme**

The IFS states that the proposed scope meets the project objectives by delivering the identified blast security measures. However, the efficiency of the project cannot yet be fully demonstrated due to the level of risk that would remain if the other vehicle mitigation measures were not implemented.

The IFS has reviewed Dublin Airport's cost estimate and considers the majority of the rates reasonable. It has made reductions only to the rates for demolishing the curtain walling and undertaking the structural renovation works, as these are higher than the IFS would expect..

Dublin Airport has reviewed the IFS position and records the following clarification and observations.

##### **1. Demolition of curtain wall**

€610/m<sup>2</sup> curtain-wall demolition rate was sourced from similar works undertaken at Manchester Airport wherein the rate was €800/m<sup>2</sup>. Owing to significantly larger area of curtain wall to be demolished at Dublin Airport coupled with easier access opportunities, this rate was adjusted (down) accordingly. This rate has been reviewed and is considered reasonable.

##### **2. Allowance for structural renovation**

This item is currently included as a provisional sum, with detailed design information not yet available at this stage. The IFS has proposed an approximate 9% reduction (from €550/m<sup>2</sup> to €500/m<sup>2</sup>), along with adjustments to associated out-of-hours and phased working allowances. These changes are considered acceptable. The resulting reduction in construction cost (excluding main contractor preliminaries and fees) is €285k.

#### **CIP27.05.05 - Security Operations Systems and Equipment**

Dublin Airport notes that the IAA has determined that certain cost elements are more appropriately included within the relevant parent Airport Development projects in which the security equipment will ultimately be installed. Accordingly, the associated funding has been removed from this project and transferred to the relevant parent projects, which are generally subject to StageGate and project-specific Trigger arrangements.

Dublin Airport does not object to this treatment in principle. However, Dublin Airport requests that the IAA and IFS provide a fully reconciled cost plan identifying the scope and costs removed from this project and the corresponding amounts added to each parent project. This is necessary to confirm that the strategic reallocation has been applied consistently and has not resulted in any unintended reduction in the overall efficient cost allowance.



### CIP27.05.07 – VCP 11 and 32 Building Replacement

The IFS states that the proposed project scope will meet the project objectives and can be considered as efficient. The IFS has reviewed the cost estimate provided by Dublin Airport and the majority of the rates and quantities included in the estimate are reasonable. In its assessment, the IFS has only made reductions to the costs of the prefabricated building for VCP 11. This reduction has been made based on the descriptions provided for the buildings which total a lower quantity than those included in Dublin Airport's cost estimate.

Dublin Airport has reviewed the IFS position and records the following clarification and observation. The IFS has proposed a reduction in the cost of the prefabricated building VCP 11, based on the modular building sizes stated in the item description. The size has been reviewed and confirmed to be consistent with the design. Accordingly, the proposed cost reduction (excluding main contractor preliminaries and fees) at €239k is considered acceptable. This results in an overall reduction to the grand total cost of €564k (i.e. 5.5%).

### CIP27.07.01 – Minor Works

The IFS acknowledges that the project will support the continued safe, functional and efficient operation of Dublin Airport. However, it considers that the scale of the proposed programme has not been sufficiently demonstrated and has reduced the allowance by reference to historical expenditure.

Dublin Airport does not consider this historical comparison to provide an appropriate basis for determining the efficient CIP27 allowance. The expenditure period relied upon includes the Covid-19 pandemic and the subsequent recovery, during which passenger volumes, operational activity and the delivery of minor works were significantly suppressed. Applying an average derived from this exceptional period would materially understate the level of investment required under normal and growing operating conditions.

The project succeeds the Minor Projects programme delivered under CIP20.07.002, for which an allowance of €14.92 million was approved during CIP2020+. The proposed CIP27 allowance of €33 million has been developed from an analysis of Airport Operations requirements across the current and previous CIP periods. It equates to an average of €6.6 million per annum and provides for a assumed programme of maintenance, operational improvements, efficiency measures and safety and security works.

The proposed allowance comprises:

- General maintenance: €8 million
- Airside operations: €7 million
- Efficiency improvements: €5 million
- Terminals and landside: €5 million
- Safety: €5 million
- Security: €3 million



These are not discretionary or general contingency provisions. They represent the categories of smaller-scale interventions required to maintain operational resilience, address emerging safety and security requirements, respond to changes in airport operations and deliver targeted efficiency and passenger-experience improvements. The precise timing and scope of individual interventions cannot always be fully defined at the beginning of a five-year regulatory period, but the requirement for a suitably scaled programme can be demonstrated from recent expenditure and the expected operating environment.

Actual expenditure between January 2020 and May 2026 was €10.33 million:

- 2020: €1.36 million
- 2021: €0.59 million
- 2022: €0.69 million
- 2023: €0.60 million
- 2024: €1.80 million
- 2025: €2.88 million
- January to May 2026: €2.41 million

Importantly, the expenditure profile shows a clear increase as normal airport activity has resumed. Expenditure increased by 60% between 2024 and 2025, while expenditure in the first five months of 2026 had already reached €2.41 million. On a simple annualised basis, the 2026 expenditure rate is approximately €5.8 million per annum, which is comparable to the proposed CIP27 average of €6.6 million than to the pandemic-affected historical average. Approximately 69% of all expenditure recorded since 2020 was incurred between January 2024 and May 2026, further demonstrating why the earlier years are not representative of the forward requirement.

The proposed allowance must also accommodate continued passenger growth, greater utilisation of airport assets and the resulting need for more frequent operational intervention. It must retain sufficient flexibility to respond promptly to evolving operational, regulatory, safety and security requirements. An allowance based principally on expenditure during the pandemic and early recovery period would risk delaying necessary works and result in fragmenting.

Dublin Airport therefore requests that the IFS and IAA reinstate the proposed €33 million allowance. The defined expenditure categories, recent spending trajectory and forecast operating environment provide a more representative and defensible basis for CIP27 than a blended historical average that includes several years of exceptional pandemic-related disruption.

#### **CIP27.07.03 – Capital Planning Studies**

The IAA has proposed that the Capital Planning Studies programme should be subject to StageGate treatment. Dublin Airport proposed that it should be treated as a flexible allowance. Both Dublin Airport and the IAA have applied a five-year asset life.



Dublin Airport considers that flexible treatment should be retained. The programme consists of a range of planning, feasibility, optioneering and longer-term development studies rather than a single defined capital project. Individual studies may need to be commissioned quickly in response to emerging operational requirements, strategic decisions or requests from airlines, the IFS or the IAA. These studies form an essential part of the capital planning and regulatory lifecycle. They provide the evidence required to assess options, establish feasibility, develop future projects and support subsequent regulatory submissions. Some studies may also be commercially sensitive or require expedited delivery, making a formal StageGate process at this early stage disproportionate.

StageGate is more appropriately applied once a defined capital project, preferred option and material investment proposal have emerged. Subjecting early planning studies to additional regulatory gateways would risk delaying the development of the very evidence and optioneering that the regulatory process requires. Flexible treatment would allow Dublin Airport to commission the necessary studies efficiently while maintaining appropriate internal governance and remaining within the approved programme allowance.



## 5. Additional Projects for Consideration

The Draft Determination assesses the projects included in Dublin Airport's final CIP27 submission. The four projects set out below were either deferred or omitted before the final programme was submitted and therefore do not currently have a specific project allowance or regulatory route through which they can be developed and, where justified, delivered during CIP27. Their proposed inclusion at this stage reflects new information contained in the Draft Determination and the supporting To70 capacity assessment, particularly:

- the IAA's passenger forecast, which is significantly higher than Dublin Airport's infrastructure-constrained forecast over 2027–2031;
- the identification of a specific service-quality concern at Terminal 1 and 2 Immigration;
- the IAA's acknowledgement that targeted terminal capacity interventions may be required if existing processing parameters become constrained; and
- the need to retain flexibility to respond to localised processing constraints without awaiting the next regulatory determination.

Dublin Airport therefore requests the inclusion of:

- Terminal 1 Immigration Facility Optimisation, as an untriggered StageGate project;
- Terminal 2 Immigration Facility Optimisation, as an untriggered StageGate project;
- Terminal 1 Central Search Mezzanine Expansion, as a StageGate and Trigger project; and
- Terminal 2 Check-in Hall Extension, as a StageGate and Trigger project.

The inclusion of these projects would not assume that each project will proceed in full during CIP27. StageGate would provide the appropriate regulatory mechanism through which the scope, need, options, cost and delivery strategy could be developed transparently and subjected to consultation with airlines and airport users. Triggered treatment, where proposed, would ensure that capital remuneration arises only when the relevant need has been demonstrated and the project has progressed to the defined delivery milestone.

The To70 assessment does not identify an airport-wide terminal capacity deficit. It does, however, identify or point towards potential localised constraints within specific passenger-processing areas. These include immigration processing at Terminal 1 and 2, the future resilience of Terminal 1 Central Search and the ability of the Terminal 2 check-in hall to respond to forecast passenger growth, larger passenger processing peaks and changes in airline operating behaviour.

Excluding the projects from the Final Determination could leave Dublin Airport without an effective route to respond should the identified constraints materialise during CIP27. Deferring all consideration until the next determination could delay targeted interventions.

### CIP27.02.01 Terminal 1 Immigration Facility Optimisation

The Terminal 1 Immigration Facility Optimisation project is proposed for late inclusion following the findings of the To70 capacity assessment. The assessment identifies Terminal 1 Immigration serving



Piers 1 and 2 as the principal potential terminal service-quality concern, with queues approaching 25 minutes for a material part of the modelled day. The assessment links this pressure to the additional arriving passenger demand generated by Pier 1 East and recommends that the matter be considered further ahead of the Final Determination.

This concern was not sufficiently established when the final CIP27 programme was submitted. The subsequent To70 findings, together with the IAA's higher passenger forecast, now provide a clear basis for including a project through which the constraint can be assessed and addressed. The project would focus initially on optimising processing capacity within the existing immigration area, including the arrangement and number of immigration desks and e-gates, passenger circulation, queuing space and the management of arrivals from Piers 1 and 2. More extensive physical expansion would only be considered where optimisation of the existing facility is demonstrated to be insufficient.

Dublin Airport requests that the project be included as an untriggered StageGate project. StageGate would provide the necessary control over the project. Initial allowances would support feasibility, option development, operational modelling, stakeholder consultation and design development. Any subsequent construction allowance would remain subject to StageGate scrutiny and evidence that the proposed scope represents the efficient response to the identified constraint.

#### **CIP27.02.03 Terminal 2 Immigration Facility Optimisation**

The To70 capacity assessment did not identify Terminal 2 Immigration as a material constraint under the modelled CIP27 design-day schedule. The existing facility was assessed as having a theoretical capacity of approximately 3,400 passengers per hour, compared with forecast scheduled demand of approximately 2,175 passengers per hour in 2028+ and 2,715 passengers per hour in 2032+. On this basis, no substantive intervention was originally proposed during the CIP27 regulatory period.

However, the To70 assessment was principally a test of scheduled demand and physical processing capacity and assumed that all available processors were open. The IAA itself recognised that this assumption does not necessarily reflect normal operating conditions and that, particularly for immigration, queue time is a more meaningful indicator of service quality than theoretical space or processor capacity alone.

Recent operational experience has demonstrated a vulnerability that is not adequately captured by the scheduled-demand modelling. On several occasions, early or out-of-sequence arrivals have generated substantial immigration queues in Terminal 2, in the most severe case extending along Pier 4 and producing passenger waiting times of approximately 70 minutes. The issue is particularly acute where high-capacity third-state services arrive earlier than scheduled or overlap with other arriving flights. These services can contain a significant proportion of passengers requiring slower manual immigration processing than EU/EEA passengers and other passenger categories able to use automated processing. A relatively small change in arrival sequencing can therefore create a short-duration demand peak materially above that represented by the planned schedule.



Once such a queue has formed, subsequent arriving passengers, including passengers with time-critical onward connections become caught behind the accumulated demand. Recent experience also indicates that fully staffing the currently available immigration positions may not provide sufficient processing capacity to clear these temporary peaks quickly enough. Operational flexibility is therefore dependent not only on the availability of immigration officers but also on having sufficient booths and e-gates into which additional officers can be deployed. Additional processing positions would enable Immigration to respond dynamically by redeploying resources from other facilities, including Piers 1, 2 and 3, when a localised Terminal 2 peak occurs.

This risk may increase as the Terminal 2 airline programme develops. Emirates, for example, is understood to be seeking continuation of its additional morning winter service into the summer schedule, with passengers presenting at Terminal 2 Immigration at approximately 07:30. This would add further concentrated third-state demand during an already sensitive morning arrivals period. More generally, future airline schedules and new business are not yet fully defined and cannot be represented with certainty in the current capacity model.

For these reasons, it is proposed that Terminal 2 Immigration Optimisation Project is reinstated within CIP27 as a contingency StageGate project rather than as a committed construction project. Its inclusion would not predetermine the need for physical expansion or require the full project to proceed. Instead, it would preserve a regulatory route through which additional e-gates, immigration booths, queue-management measures and associated circulation changes could be developed and deployed if operational evidence demonstrates that the recent queueing events are recurring or if changes in the airline schedule materially increase peak immigration demand.

This approach remains consistent with the wider IAA/To70 conclusion that the Terminal 2 facility has adequate capacity under the scheduled base case, while recognising that airport infrastructure must also provide sufficient resilience to accommodate reasonable variation around that schedule.

Retaining the project within CIP27 would therefore provide a proportionate safeguard; no expenditure beyond development would be committed unless measured queue times, frequency of out-of-sequence peaks, changes in airline schedules or other operational evidence demonstrate that additional processing infrastructure is required.

Similar to the Terminal 1 Immigration Facility Optimisation project, Dublin Airport requests that the project be included as an untriggered StageGate project. StageGate would provide the necessary control over the project. Initial allowances would support feasibility, option development, operational modelling, stakeholder consultation and design development. Any subsequent construction allowance would remain subject to StageGate scrutiny and evidence that the proposed scope represents the efficient response to the identified constraint

#### **CIP27.02.23 - Terminal 2 Check-in Hall Extension**

The Terminal 2 Check-in Hall Extension was included in the CIP27 consultation programme but was subsequently omitted following a review of the overall programme cost and prioritisation of projects



within the final submission. Its omission did not reflect a conclusion that additional check-in capacity would not be required during the regulatory period. Its reinstatement is now justified by the IAA's passenger forecast, which is materially higher than Dublin Airport's infrastructure-constrained forecast, and by the need to maintain flexibility to accommodate changes in airline schedules, passenger presentation profiles, aircraft upgauging and concentrated long-haul check-in peaks. The Draft Determination also records stakeholder concern regarding check-in desk availability and expansion.

The project would be developed in conjunction with, but would remain distinct from, the Terminal 2 Check-in and Sortation Optimisation project. The optimisation project should be implemented and its capacity benefits assessed before the need for the full extension is confirmed. However, the regulatory route for the extension must be established now so that the project can be progressed efficiently if optimisation of the existing hall proves insufficient.

Dublin Airport requests that the Terminal 2 Check-in Hall Extension be reinstated as a StageGate and Trigger project. StageGate is particularly important for this project because it will provide a structured mechanism for consultation with airlines and airport users on the detailed requirements. This should include future desk demand, common-use and dedicated airline facilities, self-service check-in and bag-drop assumptions, baggage input capacity, passenger queuing, circulation, phasing and the relationship with the existing Terminal 2 building and associated projects.

#### **CIP27.02.51 - Terminal 1 Central Search Mezzanine Expansion**

The Terminal 1 Central Search Mezzanine Expansion was deferred because the throughput achieved following the introduction of the new security equipment indicated that the full relocation of Central Search to mezzanine level was not immediately required. The mezzanine was consequently brought into use as a dedicated FastTrack facility.

This project is now proposed for inclusion because the Draft Determination introduces new considerations that were not fully reflected when the final CIP27 programme was prepared. These include the IAA's higher passenger forecast, the proposed requirement for 95% of passengers to pass through security within 20 minutes, the need to provide operational resilience during peak periods and the IAA's express acknowledgement that completion of the move of Terminal 1 security to the mezzanine could provide a targeted response if terminal processing parameters become constrained.

The To70 simulation assumes that all available processors are open throughout the day. While this is appropriate for testing the physical capacity of the infrastructure, it does not fully reflect normal operational conditions, lane outages, maintenance requirements, staffing constraints or the need to retain resilience during concentrated passenger peaks. The assessment therefore does not remove the need to safeguard an overflow solution.

The proposed project would retain the ability to provide additional screening capacity at mezzanine level while, as far as practicable, preserving the existing FastTrack operation. The project would only



progress to construction where evidence demonstrates that the existing Central Search facility requires additional capacity or resilience to meet forecast demand and regulatory service-quality requirements.

Dublin Airport requests that the project be included as a StageGate and Trigger project. StageGate would allow the configuration, phasing, operational concept, interaction with FastTrack and cost-efficient options to be developed and consulted upon with airlines and airport users. Triggered treatment would ensure that users are not required to fund the physical expansion unless defined demand, queue-time, resilience or operational thresholds demonstrate that the intervention is required.

The following project sheets provide further details of the three proposals. Supporting cost plans and drawings have also been provided for IAA consideration and IFS assessment.



# CIP27.02.01 – T1 Immigration Optimisation

Project  
CIP Number  
  
CIP Roll Over

Project Summary

T1 Immigration Optimisation  
CIP.27.02.01

This project was presented and obtained approval under CIP2020, designated by the project number CIP.20.03.018, with a budget allocation of €2.3 million. The overall objective of the project remains unchanged, with costs revised and updated to reflect minor design adjustments and to accommodate inflation-related cost increases.

| Element                  | Increase | Increase Percentage |
|--------------------------|----------|---------------------|
| CIP2020 Allowance        | €2.3 m   |                     |
| Increase                 | €1.94 m  |                     |
| Inflationary Realignment | €0.4 m   | 21%                 |
| Design Refinement        | €1.54 m  | 79%                 |
| Updated Total Cost       | €4.24 m  |                     |

The T1 Immigration Optimisation Project, which was previously deferred, is now being reintroduced as in its Draft Determination Appendix 1: CIP27 Review by Project, the IAA noted that the To70 assessment had identified the T1 immigration area as a potential future capacity pinch point following the delivery of Pier 1 East. The To70 assessment observed that, while the existing T1 Immigration Hall can provide sufficient space, the passenger queueing times can exceed the acceptable LOS thresholds at multiple periods throughout the day, despite all available immigration processing positions operating continuously.

In response, this project proposes the reconfiguration of the immigration facility layout to enhance circulation, prioritising arrivals flow from the larger Pier 1 and Pier 1 East, over the arrivals flow of Pier 2 by moving the E-gates from the northern side of the hall to the southern side. The reconfiguration will also involve the addition of one immigration officer booth and five new E-gates with a total of 12 booths and 15 E-gates provided with space reserved for an additional five E-gates if necessary, depending on future scheduling, peak passenger demand, and optimal staff resourcing. This project accommodates all building and installation works while the E-Gate units will be supplied by the Immigration Service provider. The project is to be considered in coordination and interfacing with CIP27.02.47 Remote Bussing Lounge (OCTB) and CIP27.04.29 Terminal Operational Improvements.

**Exhibit 1 – Pier 1 and Pier 2 Immigration Proposed Works (Indicative)**

The figure is a detailed architectural floor plan of the T1 Immigration Hall, illustrating proposed works for Pier 1 and Pier 2. The plan shows the layout of the hall, including existing and proposed E-gates, immigration officer booths, and various work areas. Red dashed lines indicate proposed changes to the layout, including the relocation of E-gates from the northern to the southern side of the hall. The plan also shows the location of Pier 1 and Pier 2 relative to the hall. Key features include:

- E-gates:** Existing and proposed E-gates are marked with green outlines and labels. Proposed E-gates are shown on the southern side of the hall.
- Immigration Officer Booths:** Existing and proposed booths are marked with red outlines and labels. A new booth is proposed on the southern side.
- Work Areas:** Various work areas are marked with red outlines and labels, including 'New E-gate to match existing', 'New internal divider for when impact resistant partition demolished to create one 2 arrival roads', '1 floor New Immigration booth built to match existing', 'Existing composite wall protection type to match existing', 'Observation position relocated to new position, suitable for necessary hardware and IT equipment', '12 existing in gates relocated, and 8 new supplied in new position', 'Composite wall protection type to match existing', 'Existing composite wall protection type to match existing', 'New suspended ceiling to match existing', 'New suspended ceiling to match existing', 'Composite wall protection type to match existing', 'Composite wall protection type to match existing', 'Composite wall protection type to match existing', 'Composite wall protection type to match existing', 'Composite wall protection type to match existing', 'Composite wall protection type to 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|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Key Deliverables     | <p><b>1. New Immigration Officer Booths</b></p> <p>Construction: The existing booths are to be relocated to new positions, with an additional booth added. Existing booths will be reconditioned, and the new booth will be constructed to the same specifications for consistency. Costs will cover the provision of furniture, IT systems, and their installation.</p> <p>Refurbishment: Existing desks will be refurbished and relocated.</p> <p>Restoration: Flooring and ceilings affected by the changes will be restored to current standards.</p> <p>System Modifications: Budget includes updates to mechanical and electrical systems.</p> <p>Additional Works: Relocation of the staff return valve and associated structures, finishes, doors, and access control systems.</p> <p><b>2. New E-Gates</b></p> <p>Installation: Five new E-gates will be added.</p> <p>Relocation: Ten existing E-gates and observation podiums will be relocated.</p> <p>Restoration: Impacted flooring and ceilings will be restored to match existing finishes.</p> <p>System Modifications: Includes necessary mechanical and electrical updates.</p> <p>Wall Finishes: Any new public-facing walls will be lined or replaced to match existing aesthetics.</p> <p><b>3. Queue Space</b></p> <p>Approximately 1,200 m<sup>2</sup> of the current queue area will be retained.</p> <p>Restoration: Any finishes affected by the new installations will be restored to match existing ones.</p> <p>Enhancements: Budget includes new tension barriers and signage to improve queue management.</p> |
| Capacity Benefit     | <p>The expected demand for immigration passenger processing at Terminal 1 Pier 1 and 2 is anticipated to rise, particularly with the introduction of the proposed CIP27 Pier 1 East, which will provide up to 14 additional contact and 6 bus gates; all which arrive back at Pier 1. The current facility, capable of accommodating 3,950 passengers per hour (though this fluctuates depending on the ratio of presenting EU to non-EU passengers), is presently adequate for regular scheduled operations. Nevertheless, it faces challenges in managing unforeseen peak arrivals when aircraft arrive either ahead of or behind schedule, a common occurrence due to the highly variable last wave preferred by our primary low-cost carrier.</p> <p>Consequently, this project seeks to enhance capacity to mitigate such issues while ensuring preparedness for future demands once the new Terminal 1 Pier 1 East and gates are operational and utilised to their maximum potential. With the increased processing capacity, the immigration facility's hourly capacity will expand from the current 3,950 passengers per hour to 4,190 passengers per hour, which will sufficiently meet the projected demand. The redesigned hall will also improve passenger flow by prioritising the exit flow for the more demanding Pier 1 passengers flow through the E-Gates, facilitating a more direct route to the baggage reclaim hall without conflicting with passengers exiting the immigration booths, an area that can become congested at times.</p>                                 |
| Primary Drivers      | Enhanced passenger experience and reduced queue times.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Regulatory Treatment | StageGate                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |



|                    |                                                                                                                                                                                                                                                  |                        |                   |             |
|--------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-------------------|-------------|
| Asset Life         | 15 Years                                                                                                                                                                                                                                         |                        |                   |             |
| Delivery Programme | Planning                                                                                                                                                                                                                                         |                        | Construction      | Operational |
|                    | Q4 2028                                                                                                                                                                                                                                          |                        | Q2 2031 – Q4 2031 | Q2 2032     |
| Opex Impact        | Optimising the Terminal 1 immigration hall will have a projected impact on annual operational expenditure of approximately €30k - €50k increasing costs associated with cleaning, energy use and additional repair and maintenance requirements. |                        |                   |             |
| Planning Approval  | Planning not applicable.                                                                                                                                                                                                                         |                        |                   |             |
| Cost Certainty     | Class 4                                                                                                                                                                                                                                          |                        |                   |             |
| Level 1 Costs      | Item                                                                                                                                                                                                                                             | Description            | Total (millions)  | %           |
|                    | T1 Immigration Optimisation                                                                                                                                                                                                                      |                        |                   |             |
|                    | 1                                                                                                                                                                                                                                                | Design                 | € 0.30            | 7%          |
|                    | 2                                                                                                                                                                                                                                                | Management             | € 0.22            | 5%          |
|                    | 3                                                                                                                                                                                                                                                | Construction           | € 2.54            | 60%         |
|                    | 4                                                                                                                                                                                                                                                | Construction Inflation | € 0.40            | 9%          |
|                    | 5                                                                                                                                                                                                                                                | Contingency            | € 0.78            | 18%         |
|                    |                                                                                                                                                                                                                                                  | Element Total          | € 4.24            | 100%        |
|                    | Project Total (Rounded)                                                                                                                                                                                                                          |                        | € 4.24            |             |



| <b>Project</b>            | <b>Terminal 2 Immigration Optimisation</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                     |          |                     |                   |        |  |          |        |  |                          |        |     |                   |        |     |                           |                |  |
|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|----------|---------------------|-------------------|--------|--|----------|--------|--|--------------------------|--------|-----|-------------------|--------|-----|---------------------------|----------------|--|
| <b>CIP Number</b>         | <b>CIP.27.02.03</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                     |          |                     |                   |        |  |          |        |  |                          |        |     |                   |        |     |                           |                |  |
| <b>CIP Roll Over</b>      | <p>This project was previously presented and received approval as part of CIP2020, identified by the project number CIP.20.03.024, with a budget allocation of €2.7 million. The original project has been reviewed and updated to provide additional e-gate capacity, enabling a second batch of 10 e-gates along with the requisite area for queue space. To facilitate the expansion of the immigration facility, the project now also includes the relocation of existing immigration welfare and office facilities, as well as the fit-out of the same.</p> <table border="1"> <thead> <tr> <th>Element</th><th>Increase</th><th>Increase Percentage</th></tr> </thead> <tbody> <tr> <td>CIP2020 Allowance</td><td>€2.7 m</td><td></td></tr> <tr> <td>Increase</td><td>€9.8 m</td><td></td></tr> <tr> <td>Inflationary Realignment</td><td>€1.2 m</td><td>12%</td></tr> <tr> <td>Design Refinement</td><td>€8.6 m</td><td>88%</td></tr> <tr> <td><b>Updated Total Cost</b></td><td><b>€12.5 m</b></td><td></td></tr> </tbody> </table>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Element             | Increase | Increase Percentage | CIP2020 Allowance | €2.7 m |  | Increase | €9.8 m |  | Inflationary Realignment | €1.2 m | 12% | Design Refinement | €8.6 m | 88% | <b>Updated Total Cost</b> | <b>€12.5 m</b> |  |
| Element                   | Increase                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Increase Percentage |          |                     |                   |        |  |          |        |  |                          |        |     |                   |        |     |                           |                |  |
| CIP2020 Allowance         | €2.7 m                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                     |          |                     |                   |        |  |          |        |  |                          |        |     |                   |        |     |                           |                |  |
| Increase                  | €9.8 m                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                     |          |                     |                   |        |  |          |        |  |                          |        |     |                   |        |     |                           |                |  |
| Inflationary Realignment  | €1.2 m                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 12%                 |          |                     |                   |        |  |          |        |  |                          |        |     |                   |        |     |                           |                |  |
| Design Refinement         | €8.6 m                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 88%                 |          |                     |                   |        |  |          |        |  |                          |        |     |                   |        |     |                           |                |  |
| <b>Updated Total Cost</b> | <b>€12.5 m</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                     |          |                     |                   |        |  |          |        |  |                          |        |     |                   |        |     |                           |                |  |
| <b>Project Summary</b>    | <p>The Terminal 2 Immigration Optimisation project is proposed for reintroduction as a contingency project within CIP27. While the IAA and To70 assessments concluded that the existing facility has sufficient capacity under forecast scheduled demand, recent operations have demonstrated resilience constraints not fully captured by the modelling.</p> <p>Early or out-of-sequence high-capacity third-state arrivals have generated significant queues, in some cases extending along Pier 4 with waits of up to 70 minutes despite all available booths being staffed. These peaks are further affected by passenger crossflows between Pier 3 and Pier 4, with the future opening of Pier 5 expected to introduce additional complexity. The existing hall provides limited buffer and continuous queuing space, meaning that unexpected peaks can quickly result in queues backing into the piers.</p> <p>The project would provide four additional immigration officer booths, a second bank of 10 e-gates on the eastern side of the hall to serve Pier 5 arrivals, and approximately 550 m<sup>2</sup> of additional queuing space through relocation of the existing immigration offices. This would improve resilience, reduce passenger crossflows and provide the flexibility to respond to changes in airline schedules and demand. The project would only progress where continuing operational evidence demonstrates a clear requirement.</p> <p><b>Exhibit 1 – Plan showing extension of T2 Immigration Hall (Indicative)</b></p> |                     |          |                     |                   |        |  |          |        |  |                          |        |     |                   |        |     |                           |                |  |



|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Key Deliverables | <p><b>1. Relocations</b></p> <p>The current Immigration offices area will be partially relocated and partially reconfigured to accommodate the proposed expanded Immigration processing facilities and queue space. A total of 275 square meters of existing space will be converted into offices, with 90 square meters of office space relocated to the western side of the arrivals hall and positioned adjacent to 150 square meters of relocated Immigration changing and locker room facilities. Cost to include for fit out and all associated M&amp;E and airport services installation.</p> <p><b>2. New Immigration Officer Booths</b></p> <p>Construction of 4 new Immigration Officer booths to match existing design. Includes all required furniture and IT systems. Restoration of affected ceilings and floors. Relocation and new installation of observation podium.</p> <p><b>3. New E-Gates</b></p> <p>Installation of 10 new E-gates. Impacted flooring and ceilings will be restored to match existing finishes. To include the installation of all necessary mechanical and electrical upgrades with any new public-facing walls to be lined or replaced to match existing aesthetics. The actual E-Gate units will be supplied by the Immigration service provider.</p> <p><b>4. New Queue Space</b></p> <p>A new queue area of 550 square meters will be provided, featuring updated finishes such as flooring, ceilings, and walls, along with new lighting. This will also encompass the installation of essential mechanical, electrical, and life safety systems. The costs will cover the addition of new tension barriers and signage to enhance queue management.</p>                                                                                                                                                                     |
| Capacity Benefit | <p>The anticipated demand for immigration processing at Terminal 2 is expected to increase, particularly following the delivery of CIP27 Pier 5 and the associated additional stands and gates. The existing facility, with a nominal capacity of approximately 3,400 passengers per hour, is sufficient under normal scheduled operations, although actual throughput varies depending on passenger mix and the proportion requiring manual processing.</p> <p>Recent operational experience has demonstrated that early, late or out-of-sequence arrivals can create short-duration demand peaks significantly above those represented in the scheduled modelling. This is particularly relevant to transatlantic and other long-haul services, where flight times can vary materially. When high-capacity aircraft arrive early and overlap with other services, queues can build rapidly and are difficult to recover using the existing number of processing positions.</p> <p>The project therefore provides additional reactive capacity, allowing Immigration resources to be redeployed quickly when unexpected peaks occur. This requires sufficient physical infrastructure, including additional booths and e-gates, so that extra officers can be deployed effectively when demand arises rather than being constrained by the number of available processing positions.</p> <p>With the additional processing positions and queue space, the facility capacity would increase from approximately 3,400 to 4,900 passengers per hour, providing greater resilience to schedule variation and supporting the ultimate demand associated with future Terminal 2 pier and gate development. The reconfigured hall would also improve passenger flows by directing arriving passengers more clearly and efficiently to the appropriate immigration channels.</p> |
| Primary Drivers  | <p>Enhanced capacity resilience, passenger experience and reduced queue times.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |



|                      |                                                                                                                                                                                                                                                  |                        |                   |             |
|----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|-------------------|-------------|
| Regulatory Treatment | StageGate                                                                                                                                                                                                                                        |                        |                   |             |
| Asset Life           | 15 Years                                                                                                                                                                                                                                         |                        |                   |             |
| Delivery Programme   | Planning                                                                                                                                                                                                                                         |                        | Construction      | Operational |
|                      | Q4 2028                                                                                                                                                                                                                                          |                        | Q2 2031 – Q4 2031 | Q2 2032     |
| Opex Impact          | Optimising the Terminal 2 immigration hall will have a projected impact on annual operational expenditure of approximately €20k - €40k increasing costs associated with cleaning, energy use and additional repair and maintenance requirements. |                        |                   |             |
| Planning Approval    | Planning not applicable.                                                                                                                                                                                                                         |                        |                   |             |
| Cost Certainty       | Class 4                                                                                                                                                                                                                                          |                        |                   |             |
| Level 1 Costs        | Item                                                                                                                                                                                                                                             | Description            | Total (millions)  | %           |
|                      | Terminal 2 Immigration Optimisation                                                                                                                                                                                                              |                        |                   |             |
|                      | 1                                                                                                                                                                                                                                                | Design                 | € 0.9             | 7%          |
|                      | 2                                                                                                                                                                                                                                                | Management             | € 0.6             | 5%          |
|                      | 3                                                                                                                                                                                                                                                | Construction           | € 7.5             | 60%         |
|                      | 4                                                                                                                                                                                                                                                | Construction Inflation | € 1.2             | 10%         |
|                      | 5                                                                                                                                                                                                                                                | Contingency            | € 2.3             | 18%         |
|                      | Element Total                                                                                                                                                                                                                                    |                        | € 12.5            | 100%        |
|                      | Project Total (Rounded)                                                                                                                                                                                                                          |                        | € 12.5            |             |

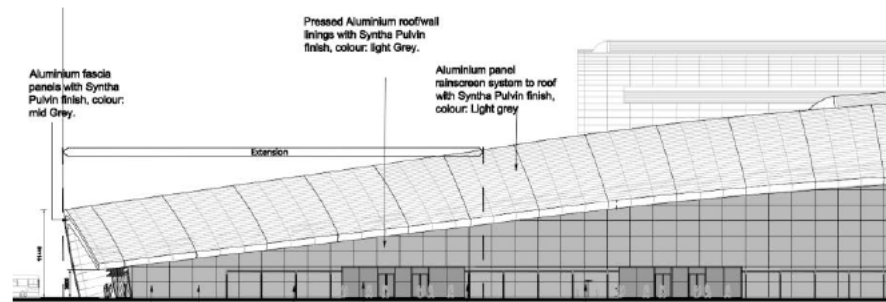


## CIP27.02.23 – T2 Check-in Extension

|                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Project         | T2 Check-in Extension                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| CIP Number      | CIP.27.02.23                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Project Summary | <p>Dublin Airport agrees with To70's assessment that CIP27.02.48 Terminal 2 Check-in and Sortation Optimisation should be the initial response to the capacity pressures identified within the Terminal 2 check-in area. This remains a priority project for Dublin Airport. The To70 assessment found that, while the check-in area generally provides an acceptable level of service throughout most of the day, there are two significant periods of congestion that adversely affect the passenger experience. These peaks are largely driven by the processing requirements of a single airline operating wide-body aircraft from a limited number of dedicated check-in desks. To70 concluded that the additional desks proposed under CIP27.02.48 could substantially reduce these peaks, particularly if they are operated flexibly in response to changing airline demand rather than being permanently allocated to a single carrier. Dublin Airport supports this approach and proposes to assess the effectiveness and efficiency of CIP27.02.48 following its implementation.</p> <p>However, Dublin Airport considers it important to retain the flexibility to progress the full Terminal 2 Check-in Extension if CIP27.02.48 does not provide sufficient capacity or if airline demand, check-in profiles, passenger behaviour or airline operating practices change during the regulatory period. A number of Terminal 2 airlines broadly welcomed the proposed extension during the CIP27 consultation and expressed concern when the project was subsequently deferred due to wider CIP funding constraints. Given the mechanisms proposed by the IAA for grouped allowances and trigger projects, overall programme expenditure will be constrained and Dublin Airport will need to focus delivery on the projects that provide the greatest operational and passenger benefits. Nevertheless, the full Terminal 2 Check-in Extension should remain within CIP27 as a flexible contingency project. It would only be triggered where the need and justification have been demonstrated and following full consultation through the StageGate process.</p> <p>If triggered, the project would augment CIP27.02.48 by extending the check-in hall eastwards by approximately 40 metres and providing 24 additional check-in desks. The extension would include the necessary supporting infrastructure, including baggage collectors and a baggage line integrated with the Terminal 2 Hold Baggage Screening system. The expansion could be delivered with minimal disruption to the existing road network and live check-in operations.</p> <p><b>Exhibit 1 – T2 Check In Expansion – Ground Floor Plan (Indicative)</b></p> |



**Exhibit 2 – T2 Check In Expansion – Street Elevation (Indicative)**



**Exhibit 3 – T2 Check In Expansion – External CGI (Indicative)**



**Exhibit 4 – T2 Check In Expansion – Internal CGI (Indicative)**



## Key Deliverables

### 1. Expanded T2 Check In Building

An eastward extension to the Terminal 2 check-in building, covering an approximate footprint of 1,900 sqm, designed to seamlessly align with the existing glazed elevations and roofline architecture. This new area will house 24 additional check-in desks along with associated queue and circulation space that will integrate with the current baggage system.

Provision will be made for space, IT, and services to support the installation of new self-service kiosks, which may be provided by third parties or as part of the broader CIP27 IT project aimed at implementing IT technology solutions.

Costs will encompass the provision of a relocated ticket office, a relocated PRM toilet, and ancillary supporting facilities on Level 15; an escape corridor and escape stairs at the basement level; restoration of external paved areas; re-installation of flag poles, signage, street lighting, and CCTV.



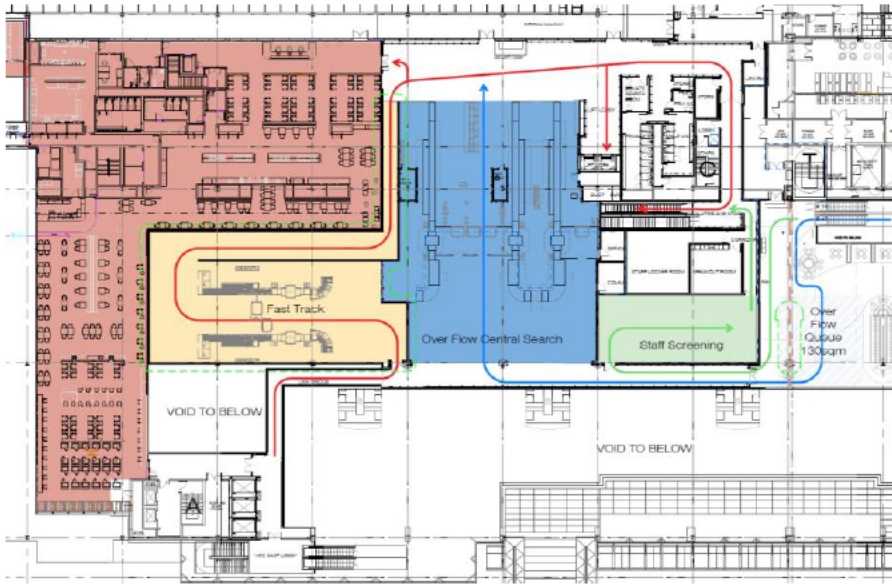
|                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      | <p>Expenses include for all wall, ceiling, and floor finishes to ensure alignment with the existing structures. Provisions have been made for blast-resistant glazing and structural components, in addition to the expansion and upgrades of the current M&amp;E systems to accommodate the new space while achieving net zero objectives.</p> <p><b>2. New Check In Desks</b></p> <p>Establish 24 new check-in desks intended for check-in or baggage drop functions. The installation will encompass the necessary infrastructure for associated CBP CCTV, FIDS, podiums, scales, IT systems, and CBP image and weight capturing systems.</p> <p><b>3. New Baggage Collector</b></p> <p>Install dedicated baggage collection and feeder lines with seamless integration with the existing baggage handling system including associated work to main processor link.</p> <p><b>4. Queue Space</b></p> <p>Provide additional 640sqm dedicated queue space for check in queue. And relocation of the airline ticket desks.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Capacity Benefit     | <p>The existing check-in hall at Terminal 2 features 60 check-in desks, which include the central desks established as part of the CIP2020 initiative. Currently, the demand surpasses the available capacity, with an optimal requirement of 64 desks. This discrepancy has led to some airlines not receiving their requested allocations, resulting in a decrease in processing capacity and an increase in passenger queues and wait times. During the peak summer season, this situation has caused the management of overflow queues to extend outside the hall, ensuring that the circulation of passengers moving towards the escalators leading to departures is not impeded. Waiting for passengers outside is neither ideal nor sustainable. Moreover, several airlines have expressed a desire to add extra services during peak times; however, we have been unable to accommodate these requests during the summer months due to check in capacity constraints.</p> <p>The existing check-in hall at Terminal 2 features 60 check-in desks, which include the central desks established as part of the CIP2020 initiative. Currently, the demand surpasses the available capacity, with an optimal requirement of 64 desks. This discrepancy has led to some airlines not receiving their requested allocations, resulting in a decrease in processing capacity and an increase in passenger queues and wait times. During the peak summer season, this situation has caused the management of overflow queues to extend outside the hall, ensuring that the circulation of passengers moving towards the escalators leading to departures is not impeded. Waiting for passengers outside is neither ideal nor sustainable. Moreover, several airlines have expressed a desire to add extra services during peak times; however, we have been unable to accommodate these requests during the summer months due to check in capacity constraints. Forecasts indicate a need for 67 desks by 2028, which is expected to rise to 74 desks by 2032. The proposed CIP27 project ultimately aims to provide 84 desks, addressing the immediate need while allowing for future growth.</p> |
| Primary Drivers      | Enhanced passenger experience and reduced queue times.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Regulatory Treatment | StageGate / Trigger                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Asset Life           | 25 Years                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |



| Delivery Programme | Planning                                                                                                                                                                                                                              | Construction            | Operational      |      |
|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|------------------|------|
|                    | No programme proposed as project will be subject to passenger SQM review during the CIP27 period.                                                                                                                                     |                         |                  |      |
| Opex Impact        | The extension of check-in services at Terminal 2 may lead to an increase in operational costs estimated between €250k and €300k annually, which will cover maintenance, cleaning, increased energy consumption, and commercial rates. |                         |                  |      |
| Planning Approval  | Will require new planning application, type to be confirmed.                                                                                                                                                                          |                         |                  |      |
| Cost Certainty     | Class 4                                                                                                                                                                                                                               |                         |                  |      |
| Level 1 Costs      | Item                                                                                                                                                                                                                                  | Description             | Total (millions) | %    |
|                    | T2 Check-in Extension                                                                                                                                                                                                                 |                         |                  |      |
|                    | 1                                                                                                                                                                                                                                     | Design                  | € 4.34           | 6%   |
|                    | 2                                                                                                                                                                                                                                     | Management              | € 4.17           | 6%   |
|                    | 3                                                                                                                                                                                                                                     | Construction            | € 43.39          | 58%  |
|                    | 4                                                                                                                                                                                                                                     | Construction Inflation  | € 9.45           | 13%  |
|                    | 5                                                                                                                                                                                                                                     | Contingency             | € 12.97          | 17%  |
|                    |                                                                                                                                                                                                                                       | Element Total           | € 74.32          | 100% |
|                    |                                                                                                                                                                                                                                       | Project Total (Rounded) | € 74.32          |      |



## CIP27.02.51 – T1 Central Search Mezzanine Expansion

|                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Project         | T1 Mezzanine Expansion                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| CIP Number      | CIP.27.02.51                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Project Summary | <p>A new Fast Track security screening facility has recently been completed at the Terminal 1 Mezzanine level, increasing premium passenger processing capacity and reducing pressure on the main Central Search facility. However, there remains limited flexibility within the overall security operation to accommodate peaks in standard passenger demand. In its Draft Determination, the IAA has proposed increasing the Quality of Service metric for 'Wait Times at Security Screening' from 90% to 95% of passengers queuing for less than 20 minutes. While the recently completed C3 upgrade has increased capacity at the main Terminal 1 Central Search facility, the proposed metric and limited operational flexibility could place additional pressure on the facility if passenger demand, processing profiles or behaviour change during the regulatory period. Additional overflow screening capacity may therefore be required to operate alongside the new Fast Track facility, providing greater operational resilience and reducing pressure on Central Search. The IFS also identified an overflow facility as an efficient means of expanding security screening capacity without requiring a full relocation or causing excessive construction or operational disruption.</p> <p><b>Exhibit 1 – T1 Central Search Mezzanine Expansion – Mezzanine Floor Plan (Indicative)</b></p>  <p>The proposed project will deliver a new Fast Track screening area, allowing the three 25 m lanes installed at Mezzanine level as part of CIP2020 to be converted into a dedicated Overflow Security Screening Facility. Operating alongside the existing Central Search facility, it will provide additional passenger screening capacity during periods of peak demand, reduce queue times and improve operational flexibility by enabling security resources to be allocated dynamically. The project will also improve the passenger experience through shorter waiting times and greater processing resilience, while maximising the use of the recently developed mezzanine-level security infrastructure.</p> <p>This is proposed as a contingency project and will only be triggered if the newly expanded Central Search facility at departures level is unable to achieve the IAA service standards due to changes in passenger demand, processing profiles, security requirements or other</p> |



|                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      | operational factors during the coming regulatory period.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Key Deliverables     | <p><b>1. Creation of New Fast Track Screening Area</b></p> <p>The project will deliver a fully operational Fast Track passenger security screening area of estimated 510sqm, including the construction of a new infill slab with supporting structure designed to maintain continuous operation of the Terminal 1 Central Search Area below. The works will include modifications to glazed partitions, installation of new mechanical, electrical and ICT services, appropriate lighting, ventilation and acoustic treatments, and the establishment of the required CPSRA boundary. The facility will be fully compliant with applicable aviation security regulations and DAP operational standards. This project will also include the provision of two 17-metre-long C3 screening lanes with all the associated security equipment and dedicated search officer workstations.</p> <p><b>2. Repurpose Fast Track Facility as CS Overflow</b></p> <p>Utilise the recently completed security infrastructure at the mezzanine level for dedicated Central Search Overflow instead of Fast Track. This includes the security equipment and VCC access routes.</p> <p><b>3. Creation of Enlarged Overflow Queue Area</b></p> <p>The project will provide a dedicated passenger queue management area serving the overflow screening facility. The works will include the removal of selected seating within the Terminal 1 mezzanine, installation of Autopass gates with associated power and communications infrastructure, defined passenger circulation routes and queue management barriers, and wayfinding signage to direct passengers from the level below.</p> |
| Capacity Benefit     | The existing Terminal 1 provides a total of 14 Central Search lanes across the departures (11 lanes) and Mezzanine level (3 lanes). The proposed project will provide an additional 2 lanes at T1 Mezzanine level bringing the T1 total provision up to 16 security lanes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Primary Drivers      | Enhanced passenger experience and reduced queue times.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Regulatory Treatment | StageGate / Trigger                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| Asset Life           | 15 Years                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

| Delivery Programme | Planning                                                                                                                                                                                                                                                                                                                                                                                                                                     | Construction | Operational      |     |
|--------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|------------------|-----|
|                    | No programme proposed as project will be subject to passenger SQM review during the CIP27 period.                                                                                                                                                                                                                                                                                                                                            |              |                  |     |
| Opex Impact        | The provision of 2 additional security lanes on Terminal 1 Mezzanine level operating as an Overflow facility up to 3 hours a day may lead to an increase in operational costs estimated of €700k. which is driven mostly by additional ASU staff required to operate the area, cleaning, maintenance, energy and water. The operational hours might be extended if required and the exact OPEX will depend on the future operating schedule. |              |                  |     |
| Planning Approval  | No planning required.                                                                                                                                                                                                                                                                                                                                                                                                                        |              |                  |     |
| Cost Certainty     | Class 5                                                                                                                                                                                                                                                                                                                                                                                                                                      |              |                  |     |
| Level 1 Costs      | Item                                                                                                                                                                                                                                                                                                                                                                                                                                         | Description  | Total (millions) | %   |
|                    | T1 Central Search Mezzanine Expansion                                                                                                                                                                                                                                                                                                                                                                                                        |              |                  |     |
|                    | 1                                                                                                                                                                                                                                                                                                                                                                                                                                            | Design       | € 1.49           | 7%  |
|                    | 2                                                                                                                                                                                                                                                                                                                                                                                                                                            | Management   | € 1.12           | 5%  |
|                    | 3                                                                                                                                                                                                                                                                                                                                                                                                                                            | Construction | € 12.49          | 59% |



|  |   |                         |         |      |
|--|---|-------------------------|---------|------|
|  | 4 | Construction Inflation  | € 2.25  | 11%  |
|  | 5 | Contingency             | € 3.78  | 18%  |
|  |   | Element Total           | € 21.13 | 100% |
|  |   | Project Total (Rounded) | € 21.13 |      |



## 6. Grouped Allowances

The IAA proposes to continue the use of grouped allowances, under which StageGate, Flexible and Deliverable projects are managed and reconciled within the relevant investment category.

Based principally on delivery performance during 2023–2026, the IAA proposes initially to recognise:

- 66% of the relevant IFS assessed untriggered Asset Management expenditure, resulting in an allowance of approximately €547 million and a reduction of approximately €284 million against the assessed project cost; and
- 70% of the relevant IFS assessed untriggered Commercial expenditure, resulting in an allowance of approximately €110 million and a reduction of approximately €48 million against the assessed project cost.

The IAA has described these adjustments as a modelling approach intended to establish a centreline estimate of likely expenditure, rather than a disallowance of the underlying projects.

Dublin Airport recognises that historic delivery performance is relevant when assessing future deliverability. However, expenditure during 2023–2026 is not a direct proxy for likely delivery during 2027–2031.

The composition and maturity of CIP27 are materially different. A number of major projects have progressed through feasibility, planning, design and procurement and are expected to enter construction during the new regulatory period. Programme management, governance, cost control and the coordination of project dependencies have also continued to develop.

The proposed reductions could create a practical barrier to the delivery of projects that the IAA has approved in principle. Once the reduced opening allowance has been committed, Dublin Airport may be unable to obtain internal financial sanction for further approved projects without sufficient certainty that the associated expenditure will be remunerated.

This is particularly important for Asset Management. Requirements may arise during the period as a result of asset condition findings, statutory inspections, safety and compliance obligations, plant failure, the loss of manufacturer support, resilience requirements or opportunities to coordinate renewal with larger construction projects. It is not possible to predict the precise sequence or scale of every intervention five years in advance.

Commercial requirements may similarly change in response to passenger needs, airline requirements, technology, commercial opportunities and the timing of associated terminal and pier developments.



Dublin Airport is also concerned that reliance solely on an end-of-period RAB reconciliation would require the airport to finance material expenditure for an extended period without sufficient prospective regulatory certainty. This could affect the timing of governance approvals, contract awards and project delivery.

Dublin Airport's preferred position is that the full IFS assessed efficient Asset Management and Commercial allowances should be reinstated.

If the reduced opening allowances are retained, the Final Determination should establish a clear prospective in-period mechanism under which:

- all projects approved in principle remain eligible for delivery
- efficient expenditure above the opening grouped allowance can be confirmed as recoverable before material commitments are entered into
- eligible substitute projects progressed through Flexible reallocation count towards the use of the relevant grouped allowance
- the originally identified project does not have to be delivered where the allowance has been efficiently applied to an eligible substitute
- existing capital reporting arrangements provide the required visibility
- the adjustment mechanism operates automatically, or against clearly defined criteria, once the opening allowance has been efficiently utilised

This approach would preserve the IAA's objective of establishing a prudent opening price cap allowance while avoiding an unintended barrier to the delivery of projects already accepted as necessary and efficient.

### Sustainability Group Allowance

The IAA has sought views on whether a similar category level reduction should be applied to the untriggered Sustainability allowance. Dublin Airport does not consider that a further reduction would be appropriate. Although approximately 56% of the Sustainability programme is currently untriggered, the majority of that expenditure remains subject to StageGate oversight. The genuinely Flexible element is approximately €121 million.

This flexibility should be retained to allow Dublin Airport to respond to changes in legislation, technology, energy markets and operational requirements during the regulatory period. It would also allow alternative projects or technologies to progress where they can achieve the same sustainability outcomes more effectively or at a lower cost than the projects originally identified.

A further reduction would be disproportionate, given that the programme is already substantially controlled through project triggers and StageGate. Dublin Airport therefore requests that the Sustainability treatment proposed in the Draft Determination be retained without an additional category level adjustment.



## 7. Trigger A

Dublin Airport supports the continued use of project-specific Trigger A and Trigger B mechanisms. Under the proposed approach, Trigger A would provide 79% of the relevant capital remuneration once the applicable planning and construction conditions have been satisfied, with full remuneration following project completion under Trigger B.

However, the Draft Determination introduces an additional portfolio-wide condition. In addition to the individual project having obtained planning approval and commenced construction, Dublin Airport would be required to demonstrate average annual efficient capital expenditure of more than €570 million in preceding years before Trigger A could be activated.

Dublin Airport understands the IAA's concern that activating additional trigger allowances while the existing untriggered allowance remains underspent could increase the passenger price cap unnecessarily. However, the proposed threshold is not aligned with either the value of the approved untriggered allowances or the expenditure that Dublin Airport can progress without further regulatory approval.

This is demonstrated through the following two scenarios, based on the IFS allowances, including construction inflation and the IAA's proposed treatment of the grouped Commercial and Asset Management Civil allowances.

Scenario 1 includes all untriggered Sustainability, Airport Development and Core programme allowances.

### Scenario 1: All Untriggered Projects

| Allowance Category          | Untriggered Allowance |
|-----------------------------|-----------------------|
| Sustainability              | €368.42m              |
| Airport Development         | €427.11m              |
| Commercial, 70%             | €65.61m               |
| Asset Management Civil, 66% | €584.37m              |
| Security                    | €85.05m               |
| IT                          | €145.96m              |
| Other                       | €70.77m               |
| Total                       | €1,747.29m            |
| Average per year            | €349.46m              |

The total untriggered allowance under this scenario is approximately €1.75 billion over the five-year regulatory period, equivalent to average annual expenditure of approximately €349 million. Even if the



full allowance could be spent without restriction, this would remain approximately €221 million below the proposed €570 million threshold.

It is also important to distinguish between an allowance being classified as untriggered and Dublin Airport having approval to proceed with the associated expenditure. Of the €1.75 billion included in Scenario 1, nearly €860 million relates to projects that must first complete the StageGate process. These projects remain subject to further consultation, regulatory assessment and a positive StageGate decision.

Excluding this StageGate-dependent expenditure, approximately €887 million can progress without further regulatory approval. This is equivalent to approximately €177 million per year, less than one-third of the proposed €570 million threshold.

Scenario 1 therefore represents the broadest possible interpretation of the untriggered programme. Even on this basis, the expenditure available to Dublin Airport is materially below the level required to activate Trigger A.

Scenario 2 considers only the Core untriggered programme, comprising Commercial, Asset Management Civil, Security, IT and Other allowances.

#### Scenario 2: Untriggered Core Projects Only

| Allowance Category          | Untriggered Allowance |
|-----------------------------|-----------------------|
| Commercial, 70%             | €65.61m               |
| Asset Management Civil, 66% | €584.37m              |
| Security                    | €85.05m               |
| IT                          | €145.96m              |
| Other                       | €70.77m               |
| Total                       | €951.76m              |
| Average per year            | €190.35m              |

The total Core untriggered allowance is approximately €952 million over the regulatory period, equivalent to average annual expenditure of approximately €190 million. The proposed €570 million threshold is therefore approximately three times the average annual Core allowance.

Furthermore, approximately €300 million of the Core allowance remains subject to StageGate approval. Excluding this amount, approximately €652 million can progress without further regulatory approval, equivalent to approximately €130 million per year.

On this basis, the proposed threshold is more than four times the annual Core expenditure that Dublin Airport can independently progress.



### Implications of the Proposed Threshold

Both scenarios demonstrate that the €570 million threshold cannot reasonably be achieved through expenditure on projects that are untriggered and already approved to proceed. Dublin Airport would first need to secure approval for a substantial number of StageGate projects and incur significant expenditure on the largest Trigger projects.

This creates a circularity. Major StageGate and Trigger projects would need to progress sufficiently to raise annual expenditure above €570 million, while Trigger A remuneration, which is intended to support the financing of those projects during construction, would remain unavailable until that expenditure had already been incurred.

The condition would also make the remuneration of an otherwise compliant Trigger project dependent on the approval, timing and delivery of unrelated projects across the wider capital programme. Delays to other projects, including delays arising from planning, procurement, stakeholder consultation or regulatory approval, could therefore prevent Trigger A from activating even where the relevant project had satisfied all of its project-specific conditions.

Dublin Airport therefore considers that the proposed portfolio-wide threshold is disproportionate and inconsistent with the purpose of Trigger A. The mechanism should operate by reference to the planning, construction and delivery status of the relevant project, rather than expenditure across the wider capital programme.

The proposed treatment would also allow the StageGate process for unrelated projects to affect the activation of Trigger A. Where airline consultation results in objections, delays or a project not receiving StageGate approval, the associated expenditure would not proceed and Dublin Airport could be prevented from reaching the portfolio-wide threshold. Airlines could therefore indirectly delay or prevent the activation of Trigger A for a separate project, even where that project had obtained planning approval, commenced construction and satisfied all of its project-specific requirements. This would create an inappropriate link between airline engagement on individual StageGate projects and the remuneration of otherwise compliant Trigger projects.

Dublin Airport's clear preference is therefore for the proposed portfolio-wide expenditure condition to be removed, allowing Trigger A to operate solely by reference to the relevant project-specific criteria.

If an aggregate condition is retained, it should be materially reduced to a level that triggers are activated within the price cap where Dublin Airport is materially on track with its core untriggered capital delivery programme. Based on the analysis of the two scenarios set out above, CIP27 untriggered projects would represent average annual expenditure of approximately €350 million when all projects are included, reducing to approximately €190 million when the assessment is limited to CIP27 untriggered core projects. This indicates that a more balanced and evidence-based approach is required when setting the trigger threshold.



Dublin Airport therefore proposes that the IAA's initial threshold of €570 million, equivalent to 110% of planned expenditure both including CIP2020 expenditure in process and the new CIP27 projects, be revised to €450 million, equivalent to 90% of planned expenditure. This would better reflect the expenditure profile identified through the analysis, while continuing to provide a challenging stretched objective and retaining the underlying intent of the IAA's original proposal

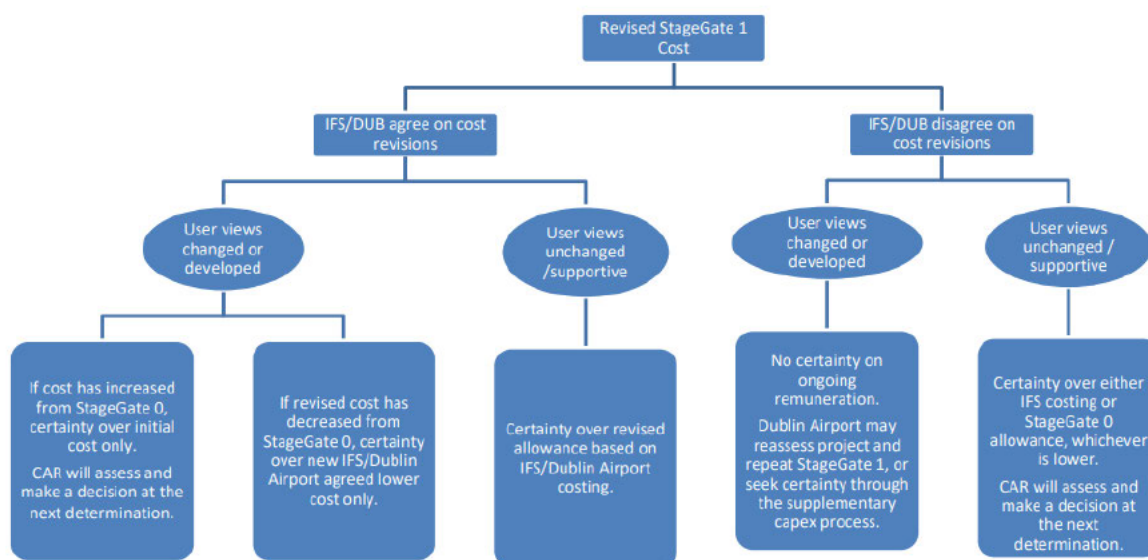


## 8. StageGate

The StageGate process has been a positive development in the regulation of capital expenditure at Dublin Airport. It provides a clear framework for assessing projects as scope and cost information develops, while giving Dublin Airport and Airport Users further opportunities to engage in meaningful consultation on certain complex projects as they progress. Dublin Airport considers that the process has worked well overall and should remain an important part of the regulatory approach for the 2027–2031 period.

As the process has developed, however, a number of areas have emerged where greater clarity and consistency would be beneficial. This is particularly relevant at StageGate 2, where projects are supported by more detailed design, procurement and cost information. In some cases, the decision tree set out in **Exhibit 5** does not provide a clear route where Dublin Airport and the IFS reach different views at StageGate 2. Dublin Airport therefore requests that the process be refined to clearly establish how such disagreements will be considered and resolved.

**Exhibit 5 – Current StageGate Decision Logic**



Dublin Airport has also noted instances during the current regulatory period where IFS positions on similar matters have not been applied consistently between projects or between StageGate stages. Greater consistency and transparency in the IFS approach would assist Dublin Airport in developing appropriate procurement strategies and preparing submission material on a more informed and efficient basis.

Separately, Dublin Airport welcomes the IAA's proposal to confirm its decision on allowances where objections arise following StageGate consultation. Once the IFS assessment, consultation and any subsequent submissions have concluded, the final outcome at StageGate 1 or StageGate 2 should clearly record the IAA's decision, including:

- the approved project scope;
- the final approved value;



- any adjustments or conditions applied; and
- the next steps and requirements to be completed.

The final decision should also confirm that, once the applicable StageGate requirements and conditions have been satisfied, Dublin Airport may proceed with the approved project scope. Any subsequent material change or justified additional expenditure should then be addressed through the defined StageGate process or, where appropriate, the next regulatory determination.

A more consistent approach to recording and confirming final decisions would provide greater certainty for Dublin Airport and Airport Users and support the efficient delivery of critical infrastructure projects at the Airport.

Dublin Airport would therefore welcome further engagement with the IAA on how the StageGate process can be optimised and improved during the next regulatory period. This engagement should consider both those aspects of the process that require refinement and those that have worked well, including the opportunities provided for Airport User consultation and feedback.



## 9. Pier and Gate Capacity, Aircraft Upgauging and Quality of Service

Dublin Airport does not agree with To70's draft assessment that the existing piers and gates are over-designed. The assessment appears to rely primarily on aggregate pier floor area and short-duration passenger demand. While this may provide a high-level indication of overall space utilisation, it does not adequately reflect how individual gates operate in practice or the functional space available to passengers using each gate.

Passengers generally remain close to their assigned gate, boarding lanes, airline desks and aircraft boarding point, particularly as boarding approaches. Spare space elsewhere within a pier provides limited practical benefit where an individual gate or group of gates is constrained.

Gate capacity should therefore be assessed on a gate-by-gate basis, or by defined groups of adjacent gates, taking account of:

- the capacity and load factor of the aircraft being served;
- the seating, standing, queuing and circulation space directly available;
- boarding and queue-management arrangements;
- simultaneous boarding and deplaning activity;
- passenger cross-flows and vertical circulation;
- assisted passenger requirements; and
- fixed infrastructure and other physical constraints.

On this basis, Dublin Airport considers that many existing gates are already at the lower end of what could be considered optimally designed. The existing facilities were designed efficiently for the aircraft types, passenger volumes and service expectations when the piers were originally constructed. However, a number of gates are now under pressure when serving the current generation of higher-capacity aircraft.

A stand may be physically capable of accommodating a larger aircraft, but this does not mean that the associated gate holdroom and passenger routes can process the additional demand at an acceptable Level of Service. Stand compatibility should not therefore be treated as confirmation that sufficient passenger capacity exists within the corresponding gate area.

This issue is important for three reasons.

First, it reinforces the need for the new pier and gate developments proposed under CIP27, together with the proposed optimisation of the existing pier facilities. These projects are required to provide additional gate capacity, improve passenger circulation and ensure that larger aircraft can be accommodated safely and efficiently while maintaining an appropriate passenger experience.



Second, Dublin Airport is concerned about the IAA's assumption that a significant proportion of passenger growth can be accommodated during the interim period through aircraft upgauging. Higher-density aircraft, such as the Boeing 737 MAX 10, place substantially more passengers within the same gate holdroom, boarding area and circulation routes.

Aircraft upgauging may reduce the number of aircraft movements required to carry a given number of passengers, but it does not reduce the need for sufficient passenger-processing capacity. In many cases, it increases pressure on gate holdrooms, boarding queues, circulation routes and airline processing areas.

Dublin Airport accepts that some upgauging may be accommodated, particularly outside the principal peak periods. However, we do not consider that the existing piers and gates can accommodate the scale of upgauging assumed by the IAA in reaching its passenger forecasts. This is particularly relevant during peak periods, when many gates within Piers 1, 2 and 3 are already constrained by limited holdroom space, restricted circulation and complex boarding and arrivals flows.

Dublin Airport therefore considers that reliance on upgauging introduces a material risk that the passenger growth assumed by the IAA will exceed the practical capacity of the existing piers and gates before the new infrastructure proposed under CIP27 is delivered.

Third, the IAA is proposing additional Quality of Service measures relating to gate-area comfort and the passenger experience. Dublin Airport supports the principle that the Quality of Service framework should reflect important elements of the passenger journey. However, this proposal must be consistent with the IAA's passenger forecast, capacity assessment and capital allowances.

Gate-area satisfaction is directly influenced by seating availability, standing space, queueing, circulation and the overall density of passengers within the holdroom. Larger aircraft will result in more passengers arriving at the gate within a concentrated period. Where the size and configuration of the holdroom remain unchanged, this will generally result in greater congestion, reduced seating availability, increased standing and queueing, and a poorer passenger experience.

It would not be reasonable to require Dublin Airport to maintain or improve passenger satisfaction with gate-area comfort while also relying on aircraft upgauging to concentrate greater numbers of passengers within existing constrained holdrooms. These two objectives are not compatible without the corresponding investment in pier and gate infrastructure.

A new gate-area service metric could also expose Dublin Airport to financial or regulatory consequences arising from the fixed limitations of legacy infrastructure. Any baseline or target would therefore need to recognise:

- the age and original design standards of the existing piers;
- the physical capacity of each gate or gate zone;



- the aircraft size and passenger demand assigned to each gate;
- the extent to which existing facilities can be modified;
- the impact of the IAA's forecast and assumed aircraft upgauging; and
- the capital investment required to achieve the proposed service standard.

Dublin Airport considers that the new and improved pier facilities proposed under CIP27 provide the appropriate long-term solution. These facilities have been sized and designed to accommodate future aircraft demand, practical gate operations and passenger expectations at an appropriate Level of Service.

Dublin Airport therefore requests that the IAA:

- review the proportion of its passenger forecast that is dependent on aircraft upgauging, having regard to the practical gate-by-gate and peak-period capacity of Piers 1, 2 and 3;
- recognise that off-peak theoretical capacity cannot necessarily be converted into additional annual passenger throughput;
- align the To70 capacity assessment with the actual passenger-processing capacity of individual gates and gate zones; and
- defer the introduction of any Quality of Service metric relating to gate holdroom space, comfort or satisfaction until the regulatory period after 2031, when the necessary pier and gate infrastructure is expected to be available.
- This would provide greater alignment between the IAA passenger forecast, the To70 capacity assessment, the CIP27 capital programme and the Quality of Service standards expected of Dublin Airport.



## 10. Level 4 and 5 Office Upgrade project (CIP.20.07.10)

Dublin Airport requests that the IAA reconsider the current decision and approve the IFS-recommended StageGate 1 allowance of €46.733m, for CIP 20.07.010. This is the IFS-assessed efficient cost after its review of the developed scope and cost plan, and not Dublin Airport's unadjusted €48.172m submission. Final costs and any further savings will be reported through a StageGate 2 submission.

### Project Criticality

This is not a standalone office fit-out. Levels 4 and 5 form part of the integrated Terminal 1 asset and share its structure, fabric, roof and facade interfaces, plant, risers, life safety systems and other common services. The facade replacement project directly affects Level 4 and Level 5 perimeter rooms which must be removed to install the new facade, while the building must be left safe, compliant, maintainable and usable. Delivering the related office refurb works while the building is already opened up provides the opportunity to coordinate access, temporary works, services and construction through the same programme. The project was previously placed on hold to avoid abortive work while the facade design was developed, and the IFS recognised that the projects had been combined to support efficient procurement and construction.

The project is also needed to provide sufficient accommodation for daa Dublin Airport and non-daa aviation-related functions. Consolidating up to 550 non-frontline and 600 frontline Dublin Airport staff on Level 5 will free accommodation elsewhere on the campus, improve collaboration and support the welfare, retention and efficient deployment of staff. This released space is required to support passenger and airport operations, including accommodation lost or repurposed through CIP2020 projects such as the T1 Lounge and T2 PBZ Lobby, and through proposed CIP27 works including the Pier 2 and Pier 3 refurbishment and optimisation. The level 4 space will also supports the wider release of space required for the North Terminal and Pier 1 East Mod 1, and for the removal of existing hangar and cargo annex accommodation to enable the full Pier 1 East and Pier 5 developments. Level 4 provides an opportunity to mitigate the resulting loss of third-party accommodation and support future aviation-related tenants.

### IFS Conclusion and Response

The IFS conclusion was supportive of the developed project and confirms that the IFS-adjusted scope and cost represent an efficient use of funds. It found the Level 5 office refurbishment, Level 4 partial strip-out to enable the facade, Level 6 plant deck and screen, APOC refurbishment and APOC-to-TOC relocation efficient. It accepted the procurement route, agreed that the design assurance and contractor design allowances were reasonable, and made no change to the contingency or inflation percentages. It also confirmed that the project would provide a modern working environment, consolidate APOC functions, extend the useful life of the upper levels and improve energy efficiency.



The IFS's concerns relate primarily to the evidence supporting the delivery of the M&E installations at this stage. They do not establish that the proposed installations are technically unnecessary or inefficient. The proposed M&E works comprise a flexible base-building package rather than tenant-specific fit-out. The main capacity, routes, risers and distribution systems can be installed now, with the final layouts, internal divisions and tenant connections adapted once the space has been allocated and occupier requirements are known. This is consistent with the approach commonly adopted for lettable office developments and allows the accommodation to support changing uses without requiring the main building systems to be redesigned.

For clarification, updated architectural layouts and M&E drawings for Level 4 have been provided. These include the existing and proposed layouts for L40, together with two mechanical-services drawings showing the proposed new risers in green and the mechanical ductwork in purple serving the existing areas to be retained. Redundant mechanical installations will be removed, and chiller units will be relocated or removed where appropriate, ensuring that the retained space is configured as efficiently as practicable at this stage.

The proposed mechanical installation is therefore not excessive. It provides the minimum base-building infrastructure required for the main supply systems, while tenant-specific fixtures, fittings and final connections can be delivered as part of the future tenant fit-out once the occupiers and internal spatial arrangements have been confirmed.

Installing the base building M&E now is efficient because the facade, roof, perimeter strip-out, riser and plant works are already being undertaken. Deferral would require a return to a completed envelope and potentially occupied or lettable space, with additional access restrictions, temporary services, protection, coordination, rework, inflation exposure and disruption. The StageGate 1 application stated that the M&E was fully designed and priced at market norms, while the IFS confirmed that the drawings showed the required level of detail and retained almost all of the submitted M&E installation costs in its assessment. The evidence therefore supports approval of the M&E as part of the integrated works.

The IFS's concern regarding the absence of named Level 4 tenants does not, in itself, remove the need to maintain the terminal as a whole or demonstrate that the accommodation has a credible future use. Furthermore it is worth noting that existing third-party terminal accommodation is fully occupied, with further demand from airlines, baggage handlers and other aviation-related users. The IFS also acknowledges the potential for maintenance and energy savings, while the IAA's decision identified estimated commercial revenue of approximately €0.3 million per annum, in addition to separate Opex savings.

### Stakeholder and Airline Comments

It is important to note that the IAA StageGate decision does not record any airline, airport user or other stakeholder as formally objecting to or rejecting the project. The comments from Aer Lingus and IATA raised questions regarding the potential future replacement of Terminal 1, the asbestos surveys, the inclusion of the APOC works and the overall project scope and regulatory treatment of the asset



replacement elements. These were matters for clarification and challenge, rather than an explicit disapproval of the project.

With regards to asset life, no final decision has been reached on the future of Terminal 1, and the current masterplanning work continues to consider both refurbishment and phased replacement options.

In this context, the IFS's identified 20-year use period provides a reasonable basis for maintaining the existing asset and keeping it fit for purpose. It should not be taken as evidence that the expenditure would be nugatory. The comparison with the earlier €21.4 million allowance is also not like-for-like. The IFS acknowledged that the StageGate 0 allowance was misaligned with the required scope and provided only for Level 5 floor refurbishment. The developed project is materially broader and includes Level 4 enabling works, mechanical and electrical services, roof and plant interfaces, APOC refurbishment and the relocation of APOC functions to the TOC. The increase in cost therefore reflects the development and clarification of the scope, rather than an increase in cost alongside a reduction in scope.

The asbestos survey was noted as being complete and an allowance had been included for the necessary asbestos management measures. The APOC and TOC elements are required because APOC is mission-critical and must remain operational throughout the Terminal 1 works. The IFS assessed both the APOC refurbishment and the relocation of APOC functions to the TOC as efficient, identifying the proposed TOC location as the most efficient option considered.

Dublin Airport estimates that approximately 30% of the proposed cost relates to steel remediation and the replacement of end-of-life electrical equipment. These works are required irrespective of the office fit-out. If the IAA considers that these elements should be classified as asset-care works, their treatment can be reviewed; however, the underlying works remain necessary and must be funded.

This is particularly important given that the CIP2020 Asset Management flexible allowance has now been closed out and reported to the IAA to support the calculation of the opening RAB for the next regulatory period. It should therefore not be assumed that the 30% allowance remains available for straightforward reallocation to fund these works.

### Response to the StageGate IAA Decision

Dublin Airport welcomes the IAA's recognition that the IFS has assessed an efficient allowance of €46.73 million and its indication that the project could be reviewed at the next determination. However, we do not consider it appropriate to retain the StageGate 0 allowance. The current regulatory period is nearing completion, the forecast expenditure has already been submitted and incorporated into the RAB, and expenditure on the Level 4 and 5 works would not commence until after Q1 next year. We therefore assume it not possible to reallocate asset-management funding from the current-period allowance to support these works within the existing regulatory period. Dublin Airport accordingly requests approval of the IFS assessed StageGate 1 allowance.



Subject to approval, Dublin Airport will continue to pursue value for money through procurement and negotiations with tenderers and will seek to identify further savings where possible. We will also review the CIP27 asset-management projects to identify any potential overlap and assess whether relevant elements of the Level 4 and 5 asset replacement works could be funded through the CIP27 flexible asset-management allowance. This review must be considered in the context of the material reduction already made by the IAA to the original asset-management allowance. Final costs, savings, scope changes and the final account will be reported through the StageGate 2 process.

We also note an apparent inconsistency in the new period Draft Determination. It does not include explanatory text setting out the IAA's final decision on the Level 4 and 5 works in the draft report and appears to rely primarily on the financial model. Within that model, one tab (2023–2026 Capex) indicates that the full €46.73 million StageGate 1 allowance has been assessed and allowed, while another tab (Continuing Untriggered Allowances) retains the original allowance of approximately €21.4 million. The IAA should clarify which allowance represents its final decision and ensure that the determination and supporting model are aligned, ideally in support of approving the full StageGate 1 IFS assessed allowance.

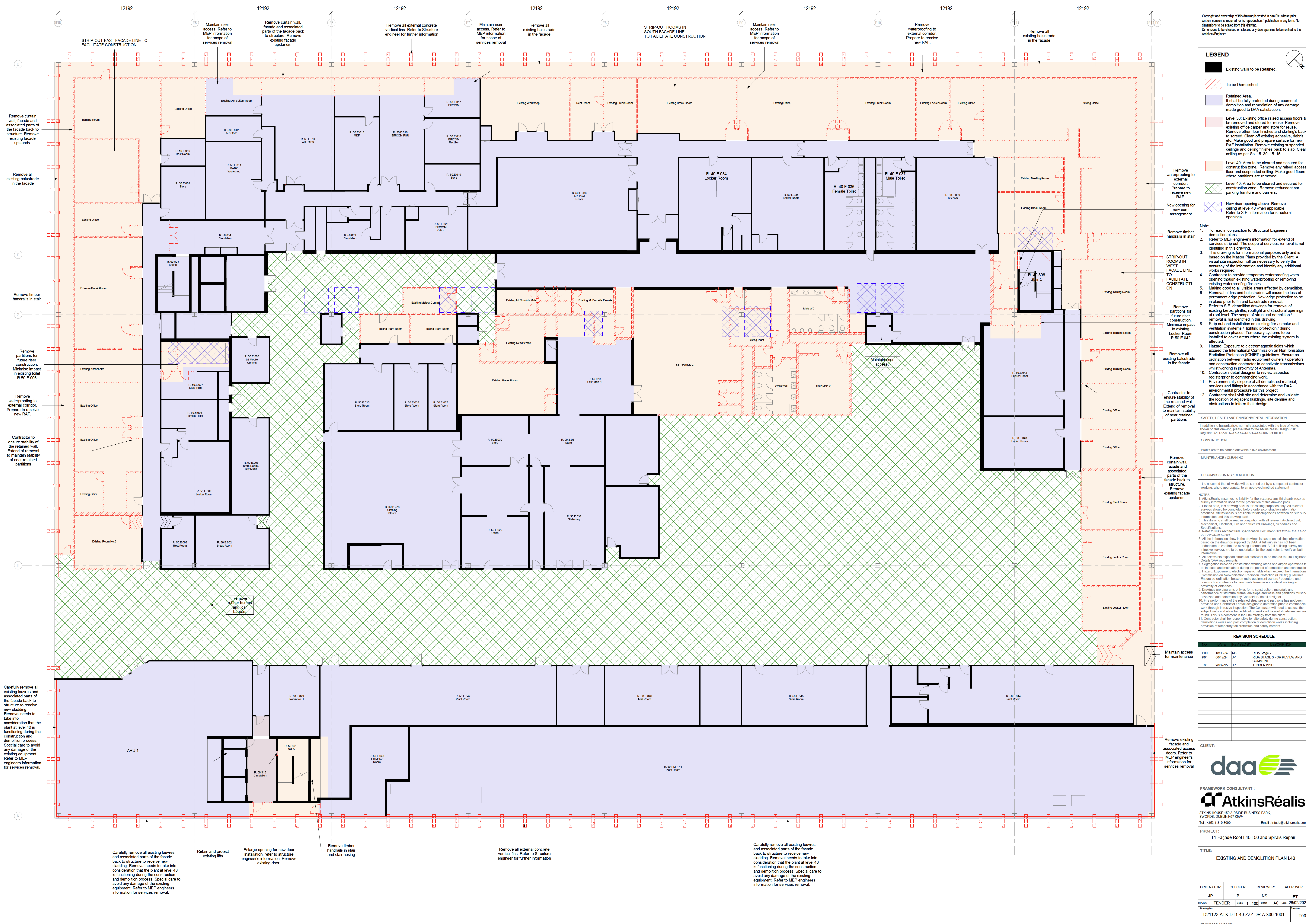
If the intention is to retain only the StageGate 0 allowance, the project would need to be significantly descope to the works required to complement the façade and the uncontested Level 5 elements. This would leave the wider accommodation, operational and asset-management requirements unresolved and would require a further StageGate 2 submission for the IFS to assess the revised scope and associated costs.

Even with this reduced scope, the likely cost would still exceed the StageGate 0 allowance. The excluded asset-management elements would then need to be funded through a flexible reallocation within the CIP27 envelope, reducing the funding available for other critical asset-replacement works. This could result in those works being deferred to the next regulatory period or create a requirement for supplementary capex. Approving the StageGate 1 IFS assessed allowance now would avoid these additional processes and funding pressures.

### Requested Action

Clarify the final allowance noting that approval of the IFS allowance would fund the efficient scope already assessed, allow the interlinked facade and Level 4 and 5 works to proceed, maintain the whole Terminal 1 asset, provide accommodation for daa and non-daa functions, and release space needed for the wider passenger and commercial development programme. Dublin Airport therefore asks the IAA to review and amend the current StageGate decision accordingly.





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**LEGEND**

- Existing walls to be Retained.
- To be Demolished
- Retained Area. It shall be fully protected during course of demolition and remediation of any damage made good to DAA satisfaction.
- Level 50: Existing office raised access floors to be removed and stored for reuse. Remove existing office carpet and store for reuse. Remove other floor finishes and skirting's back to screed. Clean off existing adhesive, debris etc. Make good and prepare surface for new RAF installation. Remove existing suspended ceilings and ceiling finishes back to slab. Clean ceiling as per Sd. 15, 30, 15, 15.
- Level 40: Area to be cleared and secured for construction zone. Remove any raised access floor and suspended ceiling. Make good floors where partitions are removed.
- Level 40: Area to be cleared and secured for construction zone. Remove redundant car parking furniture and barriers.
- New riser opening above. Remove ceiling at level 40 when applicable. Refer to S.E. information for structural openings.

**Note:**

- To read in conjunction to Structural Engineers demolition plans.
- Refer to MEP engineer's information for extend of services strip out. The scope of services removal is not identified in this drawing.
- This drawing is for informational purposes only and is based on the Master Plans provided by the Client. A visual site inspection will be necessary to verify the accuracy of the information and identify any additional works required.
- Contractor to provide temporary waterproofing when opening through existing waterproofing or removing existing waterproofing finishes.
- Making good to all visible areas affected by demolition.
- Removal of fire and balustrades will cause the loss of permanent edge protection. New edge protection to be in place prior to fin and balustrade removal.
- Refer to S.E. demolition drawings for removal of existing kerbs, plinths, rooflight and structural openings at roof level. The scope of structural demolition / removal is not identified in this drawing.
- Strip out and installation on existing fire / smoke and ventilation systems / lighting protection / during construction phases. Temporary systems to be installed to cover areas where the existing system is effected.
- Hazard: Exposure to electromagnetic fields which exceed the International Commission on Non-Ionisation Radiation Protection (ICNIRP) guidelines. Ensure co-ordination between radio equipment owners / operators and construction contractor to deactivate transmissions whilst working in proximity of Antennas. Contractor / detail designer to review asbestos register prior to commencing work.
- Environmentally dispose of all demolished material, services and fittings in accordance with the DAA environmental procedure for this project.
- Contractor shall visit site and determine and validate the location of adjacent buildings, site demise and obstructions to inform their design.

**SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION**

In addition to hazards normally associated with the type of works shown on this drawing, please refer to the Asbestos Design Risk Register D21122-ATK-XX-XXX-DR-H-XXX-0002 for full list

**CONSTRUCTION**

Works are to be carried out within a live environment

**MAINTENANCE / CLEANING**

**DECOMMISSIONING / DEMOLITION**

It is assumed that all works will be carried out by a competent contractor working, where appropriate, to an approved method statement

**NOTES**

- AtkinsRéalis assumes no liability for the accuracy any third party records or survey information used for the production of this drawing pack.
- Please note, this drawing pack is for costing purposes only. All relevant surveys should be completed before order-construction information produced. AtkinsRéalis is not liable for discrepancies between on site survey information and this drawing pack.
- This drawing shall be read in conjunction with all relevant Architectural, Mechanical, Electrical, Fire and Structural Drawings, Schedules and Specifications.
- Refer to NBS Architectural Specification Document D21122-ATK-D11-22-ZZZ-SP-A-300-2500
- All the information shown in the drawings is based on existing information based on the drawings supplied by DAA. A full survey has not been undertaken to confirm the existing information. A full building survey and intrusive surveys are to be undertaken by the contractor to verify as built information.
- All accessible exposed structural steelwork to be treated to Fire Engineer's Details/DAA requirements.
- Segregation between construction working areas and airport operations to be in place and maintained during the period of demolition and construction.
- Hazard: Exposure to electromagnetic fields which exceed the International Commission on Non-Ionisation Radiation Protection (ICNIRP) guidelines. Ensure co-ordination between radio equipment owners / operators and construction contractor to deactivate transmissions whilst working in proximity of Antennas.
- Drawings are diagrams only as form, construction, materials and performance of structural frame, envelope and walls and partitions must be assessed and determined by Contractor / detail designer.
- Fire performance of the retained structure and partitions has not been provided and Contractor / detail designer to determine prior to commencing work through intrusive inspection. The Contractor will need to access the subject walls and allow for modification works without if deficiencies are found. This is a comment in the Fire strategy from the client.
- Contractor shall be responsible for site safety during construction, demolition works and post completion of demolition works including provision of temporary fall protection and safety barriers.

**REVISION SCHEDULE**

| POD | 18/05/24 | AMK | RIBA Stage 2                        |
|-----|----------|-----|-------------------------------------|
| PO1 | 06/12/24 | JP  | RIBA STAGE 3 FOR REVIEW AND COMMENT |
| TOO | 26/02/25 | JP  | TENDER ISSUE                        |

**CLIENT:**

**daa**

**FRAMEWORK CONSULTANT:**

**AtkinsRéalis**

ATKINS HOUSE, 100 ARABEE BUSINESS PARK, SWORDS, DUBLIN, K17 XW14  
Tel: +353 1 810 8000 Email: info@atkinsrealis.com

**PROJECT:**

T1 Façade Roof L40 L50 and Spirals Repair

**TITLE:**

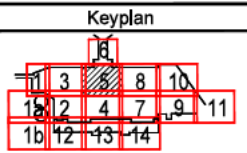
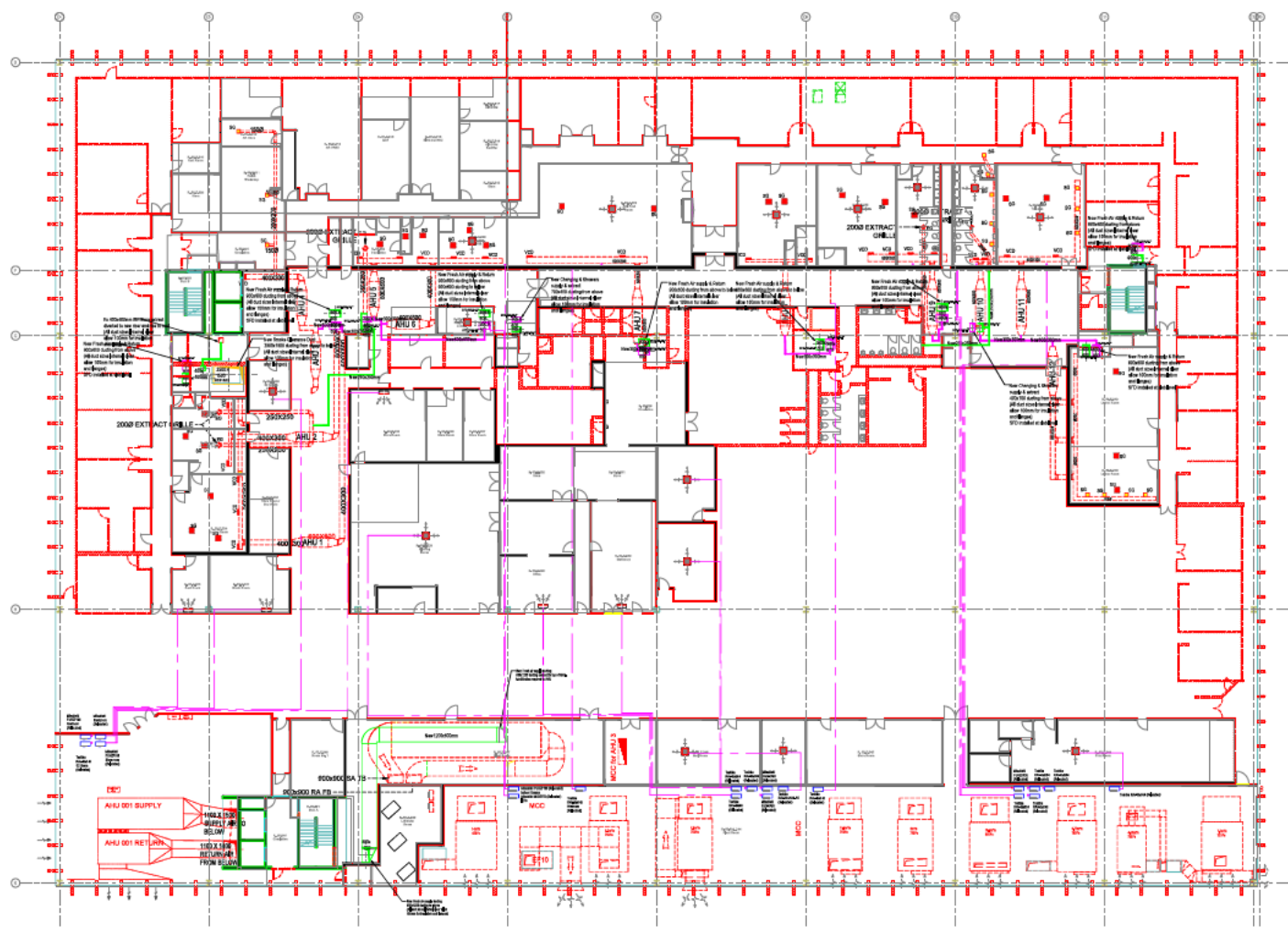
EXISTING AND DEMOLITION PLAN L40

| ORG/NATOR | CHECKER | REVIEWER | APPROVER |
|-----------|---------|----------|----------|
| JP        | LB      | NS       | ET       |

**STATUS:** TENDER Scale: 1 : 100 Sheet: A0 Date: 26/02/2025

Drawing No: D21122-ATK-DT1-40-ZZZ-DR-A-300-1001 Revision: T00

27/02/2025 11:54:05



### LEGEND

- Ventilation General Notes:**
- All works to be carried out in accordance with the design specification document.
  - For schedules of equipment see specification.
  - All duct dimensions are internal.
  - Maximum length of flexible ductwork connecting diffusers shall not exceed 300mm in length.
  - All extract volume and volume control dampers to be installed in suitable locations for future ease of access above ceilings.
  - All ductwork to be insulated in accordance with the specification.
  - All supply and extract ductwork to be bonded as to be system and its use.
  - The proposed ductwork installation shall be checked on site prior to fabrication.
  - The contractor shall indicate for all necessary checks to avoid other services and building elements.
  - All air handling equipment connected to ductwork shall be complete with ductwork connections.
  - Ductwork installation to be in accordance with the following HVAC publications D0144 & D0151.

- Legend**
- Duct Access Panel
  - Dampers VCD/MS/Smoke
  - New Supply Ducting
  - New Return Ducting
  - Existing Ducting
  - S/S Supply Air Grille
  - R/S Return Air Grille
  - E/S Extract Air Grille
  - T/S Transfer Air
  - B/S Bottom Level of Ducting
  - H/L Services at High Level
  - L/L Services at Low Level
  - S/F Motorized Smoke Fire Damper
  - Building Outdoor Condenser (Indicated)
  - Building Wall mounted AC Unit
  - Building Ceiling mounted AC Unit
  - New Refrigeration piping for Building AC units

**STATUS:**

| REV | DESCRIPTION | BY | DATE |
|-----|-------------|----|------|
|     |             |    |      |
|     |             |    |      |
|     |             |    |      |
|     |             |    |      |

**Dublin Airport**  
INFRASTRUCTURE  
Claydon House, Dublin Airport, Ireland  
Email: [infrastructure@dublinairport.com](mailto:infrastructure@dublinairport.com)  
Website: [www.dubairport.com](http://www.dubairport.com)

**PROJECT:**  
TERMINAL 1  
FACADE PROJECT  
LEVELS 40, 50, & ROOF

**TITLE:**  
T1 8-BAY  
MODIFICATION TO VENTILATION INSTALLATION  
LEVEL 40

**DRAWN BY:** CAD  
**DESIGNER:** SMC  
**CHECKED BY:** SMC  
**DESIGN MANGER:** ATK  
**STAGE:** INFORMATION  
**DATE:** 09/20/2026  
**SCALE:** 1:200  
**REVISIONS:** D21122-AAA-DT1-40-XXX-DR-M-570-1005/100



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#### LEGEND

- Existing Walls to be retained
- Area to be retained. Architecturally Out of Scope
- Level 40 minimum intervention

ED Existing Doors to be retained when located in retained partitions.

#### SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION

In addition to hazards/risks normally associated with the type of works shown on this drawing, please refer to the AtkinsRéalis Design Risk Register D21122-ATK-XXX-XXX-DR-H-XXX-0002 for full list

#### CONSTRUCTION

Works are to be carried out within a live environment

#### MAINTENANCE / CLEANING

#### DECOMMISSIONING / DEMOLITION

It is assumed that all works will be carried out by a competent contractor working, where appropriate, to an approved method statement

#### NOTES

- AtkinsRéalis assumes no liability for the accuracy any third party records or survey information used for the production of this drawing pack
- Please note, this drawing pack is for costing purposes only. All relevant surveys should be completed before construction information produced. AtkinsRéalis is not liable for discrepancies between on site survey information and this drawing pack
- This drawing shall be read in conjunction with all relevant Architectural, Mechanical, Electrical, Fire and Structural Drawings, Schedules and Specifications
- Refer to NBS Architectural Specification Document D21122-ATK-011-22-ZZZ-SP-A-300-2500
- All the information shown in the drawings is based on existing information based on the drawings supplied by DAAs. A full survey has not been undertaken to confirm the existing information. A full building survey and intrusive surveys are to be undertaken by the contractor to verify as built information
- All accessible exposed structural steelwork to be treated to Fire Engineer's Details/DAA requirements
- Segregation between construction working areas and airport operations to be in place and maintained during the period of demolition and construction
- Hazard: Exposure to electromagnetic fields which exceed the International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines. Ensure co-ordination between radio equipment owners / operators and construction contractor to deactivate transmitters while working in proximity of Antennas
- Drawings are diagrams only as form, construction, materials and performance of structural frame, envelope and walls and partitions must be assessed and determined by Contractor / detail designer
- Fire performance of the retained structure and partitions has not been provided and Contractor / detail designer to determine prior to commencing work through intrusive inspection
- Contractor shall be responsible for site safety during construction, demolitions works and post completion of demolition works including provision of temporary fall protection and safety barriers

#### REVISION SCHEDULE

| POD | 18/05/24 | AMK | RIBA Stage 2                        |
|-----|----------|-----|-------------------------------------|
| PO1 | 06/12/24 | JP  | RIBA STAGE 3 FOR REVIEW AND COMMENT |
| TOO | 26/02/25 | JP  | TENDER ISSUE                        |

CLIENT:



FRAMEWORK CONSULTANT:



ATKINS HOUSE, 100 ARSDEE BUSINESS PARK,  
STWOBES, DUBLIN K15 XW14  
Tel: +353 1 810 8000 Email: info.ie@atkinsrealis.com

PROJECT:

T1 Façade Roof L40 L50 and Spirals Repair

TITLE:

PROPOSED FLOOR PLAN L40

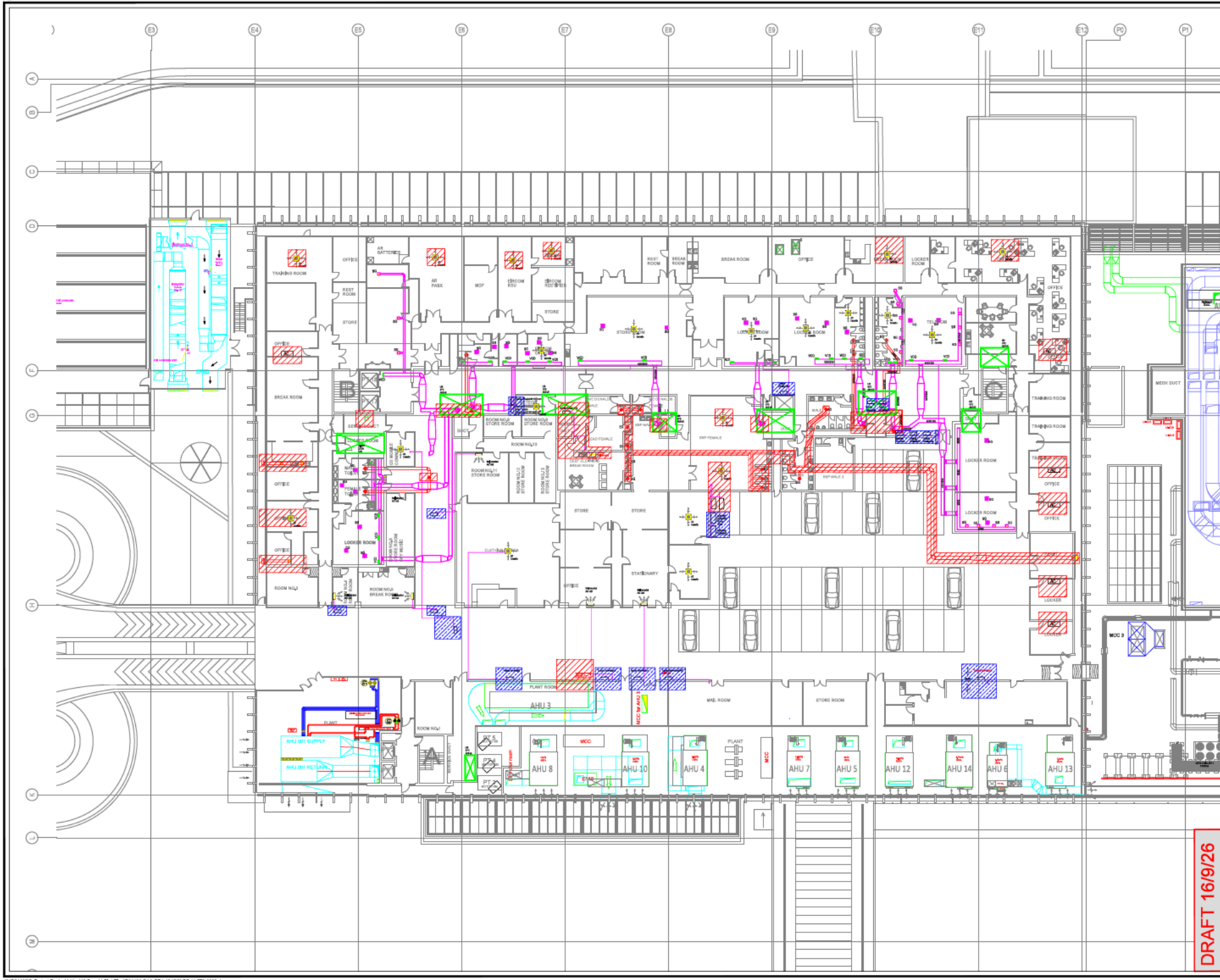
| ORG/NATOR | CHECKER | REVIEWER | APPROVER |
|-----------|---------|----------|----------|
|-----------|---------|----------|----------|

|    |    |    |    |
|----|----|----|----|
| JP | LB | NS | ET |
|----|----|----|----|

| STATUS | TENDER | Scale | 1 : 100 | Sheet | A0 | Date | 26/02/2025 |
|--------|--------|-------|---------|-------|----|------|------------|
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| Drawing No. | D21122-ATK-DT1-40-ZZZ-DR-A-300-2101 | Revision | TOO |
|-------------|-------------------------------------|----------|-----|

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**KEYPLAN**

**LEGEND**  

- LEGEND 1
- LEGEND 2
- LEGEND 3
- LEGEND 4

**STATUS:**  

| REV | DESCRIPTION       | DATE       |
|-----|-------------------|------------|
| 01  | ISSUED FOR TENDER | 09/20/2026 |

**INFRASTRUCTURE**  
Claydon House, Dublin Airport, Ireland  
Email: infrastructure@dublinairport.com  
Website: www.dublinairport.com

**PROJECT:**  
TERMINAL 1  
FACADE PROJECT  
LEVELS 40, 50, & ROOF

**TITLE:**  
T1 8-BAY  
EXISTING VENTILATION DEINSTALL  
LEVEL 40

| DRAWN BY:                                           |      | CHECKED BY: |     | APPROVED:        |           |
|-----------------------------------------------------|------|-------------|-----|------------------|-----------|
| SMcC                                                | SMcC | SMcC        | ATK | ATK              | MTHOMPSON |
| STAGE: INFORMATION                                  |      | SHEET: A1   |     | SCALE: 1:200     |           |
| DRAWING NUMBER: D21122-0AA-DT1-40-ZZZ-OR-M-570-0002 |      | REV:        |     | DATE: 09/20/2026 |           |

**DRAFT 16/9/26**