



Appendix 7. Service Quality Assessment

September 2026

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1. Introduction

- 1.1.1. Resilience sits at the core of the Service Quality Measures (SQM) regime at Dublin Airport. It underpins the delivery of a predictable, reliable and consistent passenger journey. The purpose of the regime is not only to measure performance, but to support an operation that can respond to and recover from disruption in a coordinated and effective manner. To achieve this, each metric within the SQM regime must reinforce behaviours that enhance the passenger experience and strengthen operational resilience. The SQM regime must therefore focus on the touchpoints that are most important to passengers, these being key drivers of passenger satisfaction. Understanding passengers and their needs is essential to the regime. Passenger attitudes and expectations constantly evolve in response to economic conditions, political developments and wider global events.
- 1.1.2. Metrics that incentivise outcomes outside the airport operator's control, or that drive behaviours misaligned with passenger needs, risk weakening resilience and ultimately reducing airport service quality for passengers. Resilience, Connectivity and Regulatory Consistency form the foundation of Dublin Airport's strategic positioning for the 2026 Determination. By embedding these principles into every building block and aspect of our operation, we will deliver a more reliable, connected and consistent future for our passengers.
- 1.1.3. A key factor influencing resilience at Dublin Airport is the availability of capacity. Infrastructure such as contact stands, piers, gates and US Preclearance facilities already operate at or close to maximum capacity at peak times. This limits operational flexibility and reduces the airport's ability to absorb and recover from disruption, often resulting in a sub-optimal passenger experience across multiple touchpoints during peak periods. As passenger demand continues to grow, while capacity remains constrained, these challenges are likely to become more pronounced. It is therefore essential that capacity constraints, and

Table 1. Customer and Passenger Plan for the 2026 Determination

1	2	3	4
Brilliance in the basics, ensuring reliability in essential services	Smooth passenger flow, particularly through high impact areas such as security	Excellent service provision delivered through well trained and engaged staff	Enhanced passenger satisfaction through modern, comfortable and well-maintained facilities



Repetition builds reputation. Dublin Airport aims to deliver a consistently great experience at every touchpoint, for every passenger, on every journey, every time.



their impact on service quality performance, continue to be recognised within the 2026 Determination by the IAA. Any changes to the regulatory framework that fail to account for these constraints, or that place undue emphasis on metrics disconnected from operational realities, risk undermining resilience and ultimately leaving passengers to bear the consequences through a poorer travel experience.

- 1.1.4. An airport operates as a complex system, with multiple stakeholders contributing to the passenger experience. Passengers engage with a wide range of touchpoints, many of which sit outside the direct control of the airport operator, we note this while acknowledging our role in providing for passengers and Dublin Airport, as the facilitator has significant responsibility, especially in the perception of the passenger. Resilience must therefore be a shared responsibility across all parties operating within the airport environment. The extent to which third parties can affect the passenger's perception of service quality in the airport must be acknowledged and considered by the IAA in their 2026 Determination Final Decision. Dublin Airport do not believe that financial impacts should be attached to metrics that are not Dublin Airport's sole responsibility, whereby external factors, over which we have no control, influence passenger's viewpoint and their perception of airport performance.

1.2 PAG

- 1.2.1. The Passenger Advisory Group (PAG) is the key function, facilitated by the IAA, whereby passengers directly input into the service quality standards they expect Dublin Airport to meet in the next Regulatory Period. The IAA directly consults with the PAG before issuing their Draft Decision and thus the PAG plays a pivotal role in shaping the service quality targets for Dublin Airport. Dublin Airport shared its Regulatory Proposition plans with passenger stakeholder representatives, specifically the plans within the SQM regime and Capital Investment Plan (CIP) at the first meeting of the PAG in January 2026. Passenger representatives listened to the proposed changes and had the opportunity to indicate whether they agreed or disagreed with their implementation. There was significant feedback on airline-related issues, as well as on the accessibility of airport infrastructure and wayfinding. There was no push-back from the PAG on the changes proposed by Dublin Airport for the 2026 Determination. The PAG were in support of the changes proposed by Dublin Airport, within Security and Passenger Satisfaction metrics, as well as the proposal to maintain the existing targets and methodology for PRM metrics and Asset Availability.
- 1.2.2. Dublin Airport is concerned by the process through which the IAA's Draft Determination proposals have been developed alongside the PAG. While the PAG was consulted, the concepts underpinning many of the IAA's proposed amendments originated from the regulator rather than the PAG itself. Furthermore, these proposals were not raised during the initial PAG discussions,

and Dublin Airport was not present nor invited when the IAA presented its suggested changes to the group at the second meeting of the PAG. As a result, Dublin Airport was not afforded the opportunity to provide operational context, challenge assumptions, or address key considerations that appear to have been omitted from the discussion and subsequent proposals. There are metrics that we monitor that we would have preferred to introduce over those suggested by the IAA, which will be outlined in this Appendix. We believe our selection is more in line with the general passenger base, touchpoints that all passengers experience and are compulsory to their journey as they pass through Dublin Airport. This is the core function of the SQM regime: to support the passenger throughout their journey, at every touchpoint, prioritising what the passenger needs and the key areas that drive passenger satisfaction.

1.3 Dublin Airport Regulatory Proposition and Issues Paper Response

- 1.3.1. Dublin Airport's response to the IAA's Issues Paper and its Regulatory Proposition have both emphasised the consistent focus on delivering meaningful improvements for passengers through a balanced and evidence-based framework, taking into account the current climate in which Dublin Airport operates in relation to passenger growth and worsening capacity constraints.
- 1.3.2. Key proposals have included a revised and more stretching security queue time target to enhance the passenger experience at a critical and far-reaching touchpoint. Dublin Airport also proposed changes to Passenger Satisfaction metrics that have consistently failed to reach targets, ensuring the SQM regime is calibrated to achievable targets with a continuous improvement approach. Dublin Airport requested greater clarity on the eligibility of exemptions to ensure the airport is not held accountable for factors outside of its direct control. This principle is reinforced throughout Dublin Airport's 2026 Determination submissions, consistently emphasising the point that financial incentives should only be attached to metrics that are within the airport's direct control and not materially influenced by external parties. In this regard, we have also highlighted a key takeaway from the Passenger Advisory Group meeting on January 21st, 2026, where PAG members both noted that many of their dissatisfactions were with airlines' handling of complaints and recognising that third parties and other airport users, including airlines, can materially impact the passenger experience and overall journey satisfaction.
- 1.3.3. In relation to this shared control, Dublin Airport had outlined the possibility of introducing joint metrics in its Regulatory Proposition. This was in response to the issues raised by the PAG in relation to airline performance, the shared responsibility between the airport and airlines in providing PRM services and across the SQM regime.
- 1.3.4. Finally, Dublin Airport has advocated for an achievable bonus regime that maintains a proportionate balance between risk and reward, ensuring incentives drive performance improvements while remaining realistic and deliverable. These principles underpin the position set out in our response to the IAA's Draft Determination, which further supports our proposals through operational experience, stakeholder feedback, and an evidence-based assessment of what can reasonably be achieved.

1.4 Response to the IAA's Draft Determination

- 1.4.1. Dublin Airport strongly disagrees with the IAA's proposed approach to service quality in the Draft Determination. The proposed changes represent a significant and unwarranted tightening of service level targets across multiple areas, while also introducing new performance measures that have not been demonstrated to be necessary, proportionate, or aligned with passenger priorities. The IAA is asking Dublin Airport to do more with less. The proposed framework provides no additional Opex or Capex allowance to support these changes and makes no adjustment for worsening capacity constraints, despite the impact these constraints will have on the airport's ability to deliver additional requirements.
- 1.4.2. The Draft Determination does not adequately recognise the operational environment in which Dublin Airport is required to deliver these services. As mentioned above, Dublin Airport has operated under severe capacity constraints while serving record breaking passenger volumes throughout the current regulatory period. These constraints will only increase in future years. Despite these challenges, Dublin Airport has continued to invest substantial resources and effort into maintaining and improving service standards, delivering strong outcomes for passengers while managing the practical limitations imposed on the airport's operation.
- 1.4.3. The IAA's proposal to increase performance requirements across almost all existing metrics, while simultaneously introducing additional measures, is disproportionate and unsupported by passenger-based evidence. The proposed increase in reporting frequency for metrics such as Asset Availability offers limited passenger benefit while increasing the operational burden associated with compliance. As passenger volumes continue to rise, month-to-month performance becomes more susceptible to operational pressures and natural variability, making consistent achievement of increasingly stretching monthly targets difficult and, in some cases, unrealistic. Greater reporting frequency should only be introduced where there is a clear and demonstrable benefit to passengers. Targets set at 99% do not allow for any externally driven anomalies or unforeseen events, resulting in unrealistic expectations given the operating environment of Dublin Airport.
- 1.4.4. By proposing an even stricter security queue time metric than Dublin Airport's own proposal, together with a new Staff Search Queue Metric, the IAA is effectively asking for the delivery of higher performance without the investment needed to achieve it. No additional Capex allowance has been provided, despite the significant infrastructure and operational enhancements that would be required. This further demonstrates the disconnect between the IAA's expectations and the reality of Dublin Airport's increasingly constrained operating environment.

Magnitude of Incentives

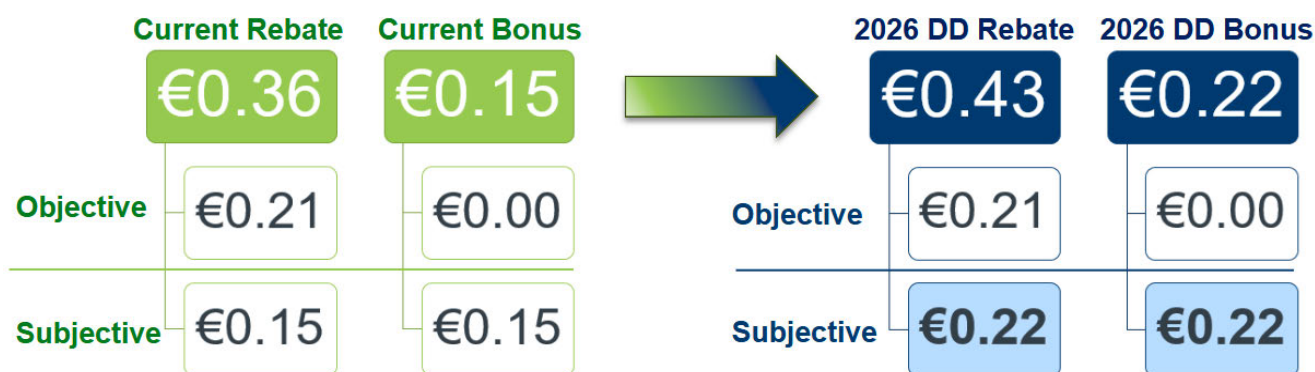
- 1.4.5. The IAA propose seven new metrics for the passenger satisfaction survey; however, the proposed changes are not clearly linked to passenger priorities, nor do they reflect the service

improvements that passengers have consistently identified as most important through existing feedback channels.

1.4.6. Dublin Airport considers a more balanced structure between rebates and bonuses is necessary, which is only reinforced further following the IAA’s proposal to introduce seven new passenger satisfaction metrics which risks disproportionately skewing the balance between risk and reward. The asymmetry that exists currently between the rebate and bonus thresholds leaves the airport facing far greater downside risk. In the absence of a rebalancing of the incentive regime, the proposed framework risks creating an undue skew towards downside risk resulting in a disproportionate allocation of regulatory risk. As the IAA outlined in its Issues Paper and Draft Determination, its objective is to establish incentives which represent a balance between incentivising desired outcomes without being punitive or disproportionate.

1.4.7. Not only does this imbalance affect operational efficiency and feasibility, but also the magnitude and proportionality of the price cap. Dublin Airport believes this level of adjustment increase moving from €0.15 to €0.22 is disproportionate and leaves the service quality regime with too large an adjustment on the overall price cap, particularly in a context where the price cap is reducing. As shown from the figure below this amendment to the incentives scheme increases Dublin Airport’s rebate ceiling to €0.43. Dublin Airport believe this rebate threshold does not achieve the IAA’s outlined objective of striking a proper balance between incentivising desired outcomes without being punitive or disproportionate.

Figure 1: Magnitude of incentives



1.5 Consumer Vulnerability

1.5.1. Dublin Airport understands the importance of understanding and considering consumer vulnerability within the airport environment to ensure the SQM regime supports passengers' safety, security and overall wellbeing. While SQMs primarily measure service performance, passenger experiences and perceptions can also be influenced by personal circumstances or vulnerabilities that affect how airport services are accessed and experienced, this not being within the control of Dublin Airport. Dublin Airport aims to embed consideration of consumer vulnerability throughout the development and implementation of the 2026 Determination, helping to ensure that airport services are inclusive, accessible and responsive to the needs of

all passengers. The impact of consumer vulnerability on passenger perception must be considered by the IAA when evaluating the inclusion of new metrics within the regime.

1.5.2. In its Aviation Consumer Survey, the Civil Aviation Authority (CAA), has identified consumer vulnerability as an important consideration in the aviation sector¹. The research shows that passengers in certain vulnerable circumstances are less satisfied with their journey than those who are not vulnerable. Dublin Airport recognises the relevance of this concept when evaluating the effectiveness of the SQM regime and understanding passenger expectations and experiences.

1.5.3. Consumer vulnerability can arise from individual characteristics, personal circumstances, as well as the operating environment or business practices that make a passenger more susceptible to harm or disadvantage. Importantly, vulnerability is not limited to specific groups and may affect any passenger at different points during their journey. Consumer vulnerability may arise in a range of forms within the airport environment, including the following:

- Digital vulnerability
- Language and communication barriers
- Personal circumstances
- Accessibility and disability requirements
- Financial vulnerability

1.5.4. Recognising these factors helps ensure the SQM regime remains focused on delivering a positive and inclusive passenger experience for all users of Dublin Airport. Passenger satisfaction scores may be influenced not only by the standard of service quality, but also by individual vulnerabilities and circumstances that affect how airport services are experienced. The IAA should therefore consider the potential impact of consumer vulnerability when introducing new metrics or increasing performance thresholds, ensuring targets remain proportionate, achievable and reflective of the diverse needs and experiences of Dublin Airport's passenger base.

2. Objective Metrics

2.1.1. Operational resilience remains a core strategic priority for Dublin Airport within the new regulatory period. Dublin Airport operates within a complex and highly regulated environment where the consistent delivery of safe, efficient and high-quality service is dependent upon the resilience, reliability and the effectiveness of the operational landscape. Objective metrics are at the heart of this and are fundamental in enabling Dublin Airport's maintenance and provision of high levels of service year-round. Security Screening and Wait Times, Passengers with Reduced Mobility (PRMs), Asset Availability and Baggage Handling Systems (BHS) are key touchpoints in the passenger journey and are central to ensuring a safe and enjoyable airport

¹ [CAA Aviation Consumer Survey - October 2024 \(Wave 13\)](#)

experience for all passengers. Objective metrics provide measurable, evidence-based indicators that allow Dublin Airport to assess performance, identify underlying issues and ensure that operational standards are consistently achieved. This section sets out Dublin Airports response to the IAA's proposed amendments to the objective metric framework for the upcoming regulatory period, outlining the rationale for its position on each target.

2.2 Security

Overview of performance

- 2.2.1 Security screening is a fundamental statutory obligation at Dublin Airport and a critical control measure in ensuring the safety and security of passengers and staff, enabling efficient airport operations. It is a critical touchpoint for passengers and represents one of the most important stages of the passenger's journey through the airport.
- 2.2.2 Dublin Airport has consistently performed well on security queue times between 2024-2026, with consistent improvement seen throughout. 2025 passed without any security queue time breaches, while 2026 has so far incurred a single breach in July, this being a month managing peak summer demand and high passenger volumes. A key factor underpinning this performance has been the operational resilience of the security screening operation. Dublin Airport's operational resilience is further evidenced by its ability to maintain high levels of service quality across security screening despite the continued growth in passenger demand. This resilience is a key factor in sustaining strong security queue time performance throughout the current regulatory period. This sustained improvement in security queue times has delivered tangible benefits for passengers including reduced waiting times, greater reliability within the airport journey and an enhanced passenger experience overall.

Key Points from the Issues Paper Response and Regulatory Proposition

- 2.2.3 In its Regulatory Proposition, and Issues Paper Response, Dublin Airport expressed its views on the current regulatory framework regarding security search and screening. In both submissions Dublin Airport set forth its proposed changes and amendments for the forthcoming regulatory period.
- 2.2.4 Dublin airport acknowledged its improvement in security queue time performance since 2022, this informing the more stretching proposal of a target of 90% of passengers processed within 20 minutes reported monthly. A monthly metric more accurately reflects the passenger experience delivered, aligning with how security is planned and managed, as well as being much less volatile than a daily measure. This was proposed in place of the current target of 70% of passengers processed within 20 minutes measured daily. Dublin Airport is willing to adopt this amended metric on the condition that the 2025 security resourcing allowance (n+1) is applied as the baseline. As highlighted, protecting passengers and promoting safety, while delivering a reliable and enjoyable airport experience for passengers are of the utmost importance to Dublin Airport, hence the proposal of this significant increase in the queue time targets and continuous

improvement focus. To achieve this, appropriate Opex must be allowed as well as the outlined resilience adjustment.

2.2.5 Dublin Airport also highlighted the importance of having adequate staffing levels and resources provided in relation to security queue time performance. With ever advancing EU and National security obligations as well as protection against existing and emerging threats, increased staffing levels and more advanced training is required. The importance of ensuring optimal levels of staff is in place will only grow as passenger volumes increase and queue time targets become more challenging, stretching Dublin Airport's operational limits. Dublin Airport consistently maintains optimal security queue times and in order to ensure this performance continues, the appropriate resources must be provided, coupled with a regulatory framework that supports and incentivises operational resilience.

Key points of IAA's Draft Determination

2.2.6 In its Draft Determination, the IAA set forward several amendments and proposals regarding security screening and queue time targets. The IAA acknowledge that security queue time performance across 2024 and 2025 has been adequate whilst also stating its aim is to maintain current performance levels rather than seeking further improvement.

2.2.7 The IAA proposed to maintain the target of 100% of passengers processed through security in under 30 minutes which Dublin Airport supports. Dublin Airport believes the current target remains appropriate and strikes the correct balance between promoting operational efficiency and protecting the passenger experience without being overly punitive.

2.2.8 An increase from 70% to 95% of passengers processed in under 20 minutes was proposed by the IAA. The IAA justify these targets stating they should be based on maintaining current performance and that this target will incentivise Dublin Airport to continue running the existing security operation in a way it can process the majority of passengers within 20 minutes.

2.2.9 Another key change proposed by the IAA is the introduction of a Staff Search metric. This proposed metric is justified by the IAA who highlight the importance of Staff Search for orderly operation of the airport and through the existence of a similar metrics at comparator airports. The IAA propose a monthly target of 99.5% of staff processed within 10 minutes at Staff Search with a monthly rebate of €0.01 applied per terminal. Despite this proposal the IAA acknowledge that there has been no data nor submissions identified outlining existing service quality issues related to Staff Search.

2.2.10 An analysis conducted by the IAA in which they compared security queue time targets at Dublin Airport to comparator airports; Heathrow, Gatwick and Lisbon airports showed that Dublin Airport's targets are closely aligned with these airports. IAG raised concerns that Dublin Airport's targets compare unfavourably to others. The IAA noted the different methodology used requires different queue time targets.

- 2.2.11 The IAA included another analysis which they conducted on Dublin Airport's historic performance under several different queue time metrics. They found that there would have been zero months breached under Dublin Airport's proposed 90% within 20 minutes target. The IAA determine from this that Dublin Airport's proposed target is no more stretching than the current target and would permit a significant deterioration in queue time performance.
- 2.2.12 The IAA's Draft Determination also outlined the possibility of moving away from the 30-minute daily target to an equally challenging daily target of 98.5% under 25 minutes. Despite this suggestion it is noted that no stakeholders have proposed any changes to the current 30-minute target which is in place.
- 2.2.13 The IAA reference the relationship between the security queue time performance and commercial revenue performance. Outperformance and the shorter queue times of 2025 would have contributed to F&B outperformance, in turn balancing security costs, though this effect is not quantified nor analysed in any detail. The IAA also state that they do not propose to set security queue targets requiring an improvement in current performance, if Dublin Airport wishes to resource security beyond what is required by IAA targets, for financial reasons, passenger satisfaction or reputational reasons, Dublin Airport is entitled to do that at its own expense, that is without any changes to Opex forecasts.

Dublin Airport's Response to the Draft Determination

Security Queue Time Metrics

- 2.2.14 Dublin Airport does not support the IAA's proposed target of 95% of passengers processed through security screening within 20 minutes and urges the IAA to reconsider this proposal. In its Regulatory Proposition, Dublin Airport proposed a substantial increase to the existing target, proposing an increase from 70% to 90% of passengers processed within 20 minutes. This proposed change represents a far more demanding performance standard and a significant strengthening of the target currently in place.
- 2.2.15 The IAA's proposed 95% of passengers processed within 20 minutes is a far more stringent standard than that set forward by Dublin Airport in its Regulatory Proposition. When considered alongside the projected growth in passenger volumes over the forthcoming regulatory period, the proposed target would place significant additional pressure on airport resources and operational capacity, particularly during periods of peak demand. Achieving compliance at a target of 95% consistently would require exceptional levels of operational performance across all conditions, including those affected by demand volatility and other external factors. Dublin Airport considers that the proposed standard does not adequately reflect the operational realities of managing a high-volume security screening operation that is continuously growing. This creates a substantial risk of non-compliance despite the deployment of appropriate and efficient resources. Consequently, Dublin Airport considers the IAA's proposed target to be disproportionate, operationally challenging and unattainable consistently over the coming regulatory period.

2.2.16 If the IAA views a higher target than 90% as necessary, Dublin Airport is willing to accept a revised target of 92% of passengers processed within 20 minutes monthly, provided that the security resourcing allowance (n+1) is applied as the baseline as proposed in its Regulatory Proposition.

2.2.17 Dublin Airport considers the inclusion of a resilience lane fundamental in delivering on any more challenging targets as compared to the 2022 Determination. This ensures operational resilience across the airport over the forthcoming regulatory period and is essential in maintaining operational flexibility, absorbing fluctuations in passenger demand, and managing unforeseen disruptions without compromising service quality. This addition will significantly strengthen Dublin Airport's ability to consistently achieve a more challenging performance target while maintaining compliance across a range of operating conditions.

2.2.18 In response to the IAA's proposal to the future possibility of changing the 30-minute target as outlined in the Draft Determination, Dublin Airport is not supportive of this. Dublin Airport considers the current 30-minute target to represent an appropriate and proportionate balance between incentivising operational efficiency while also safeguarding the passenger experience, without being overly punitive. As acknowledged by the IAA in its Draft Determination, no stakeholder submissions have identified any underlying issues with the current target. The IAA also state its objective is to maintain current performance levels further accentuating changes to this target as unnecessary.

Staff Search

2.2.19 We strongly oppose the IAA's proposal to introduce a Staff Search queue time metric as requested by IATA and IAG. Dublin Airport considers the introduction of such a metric to be unnecessary and disproportionate with little upside and a material risk of adversely impacting the effectiveness of current staff search operations. In its Draft Determination, the IAA acknowledge that neither the data nor stakeholder submissions have identified any service quality or performance issues within Staff Search. In the absence of evidence demonstrating performance issues, the rationale for introducing a target is unclear if performance is of a high, satisfactory standard for all parties involved.

2.2.20 Dublin Airport cannot agree to a financially backed Staff Search queue-time target at this stage. While there is support for effective monitoring and continuous improvement, the proposed metric would impose accountability before the necessary infrastructure, dedicated resourcing, forecasting capability and operational controls are in place.

2.2.21 The initial IAA request was in relation to the availability of monitoring data; the existence of emerging data does not in itself, establish that the operation is ready for a regulatory target. Any future metric must therefore be preceded by an agreed definition and methodology, a representative validated baseline, adequate Capex and Opex allowances, appropriate exemptions and a phased shadow-monitoring period.

2.2.22 A key issue overlooked within the proposed IAA target is that Staff Search facilities are utilised by all personnel requiring airside access, not solely airline employees. This includes ground handling staff, baggage handlers, gate agents, and personnel from numerous other airport operators. The arrival patterns of these different members of staff are inherently unpredictable, with operational disruptions and external factors outside Dublin Airport's control frequently influencing arrival times. As a result, Dublin Airport remains exposed to periods of concentrated staff arrivals throughout the day, creating sudden and significant demand on Staff Search resources. Given these circumstances, the current Staff Search operation is inherently vulnerable to fluctuations in queue lengths and processing times, limiting its ability to consistently achieve the proposed target.

Conclusion

2.2.23 As Dublin Airport maintains compliance with EU and National regulations while achieving SQM targets set by the IAA, it is imperative that the regulatory framework supports this through the necessary provision of resources to fund these operations. Through a balanced security regime that penalises breaches while simultaneously incentivising improvement, Dublin Airport can and will continue to grow and provide the highest possible quality of service to passengers.

2.2.24 The IAA's proposed Staff Search metric and an increase to 95% of passengers processed within 20 minutes, risk discouraging this growth and diverting resources towards increasingly marginal performance gains rather than areas where investment would deliver greater operational and passenger benefits. Dublin Airport believes that the proposals set out in this response strike an appropriate and proportionate balance between delivering high-quality security screening services, maintaining operational resilience, and meeting regulatory obligations.

Table 2. Summary of current and proposed changes to Security metrics

Metric	Current Target	Price Cap at Risk Currently	Dublin Airport Regulatory Proposition Proposal	IAA Draft Determination Proposal	Dublin Airport Final Proposal
Security Queue Time	100% < 30 minutes	€0.01 daily	No Changes Proposed	No Changes Proposed	No Changes Proposed
	100% < 45 minutes	€0.02 daily	No Changes Proposed	No Changes Proposed	No Changes Proposed
	70% < 20 minutes	€0.005 daily	90% < 20 mins with a monthly rebate of €0.02	95% < 20 mins with a monthly rebate of €0.02	92% < 20 mins with a monthly rebate of €0.02
Staff Search	None in Place	None in Place	Nothing Proposed	99.5% < 10 minutes with a monthly rebate of €0.01 per terminal	Reject proposed staff search metric

2.3 Asset Availability

Overview of performance

2.3.1 Throughout 2023, 2024 and 2025 Dublin Airport maintained a consistently high standard of asset availability and baggage handling services, as recognised by the IAA in both its Draft Determination and Issues Paper. This strong performance has allowed Dublin Airport to consistently achieve demanding targets set throughout the regulatory period. This high level of performance was seen in areas including baggage handling, IT system targets, inbound and outbound baggage, passenger facing escalators and lifts, Self-Service Kiosks (SSKs), Fixed Electrical Ground Power (FEGP) and Automatic Visual Docking Guidance System (AVDGS) respectively. However, this significantly high level of performance will become increasingly difficult to sustain and improve upon as passenger demand continues to grow, placing additional stress on an already aging asset base.

Key Points from the Issues Paper Response and Regulatory Proposition

2.3.2 In both its Issues Paper Response and Regulatory Proposition, Dublin Airport highlighted its operational resilience and the role it plays in the sustained high level of performance across both asset availability and baggage handling systems with all targets having been achieved since the 2022 determination. While this record demonstrates the consistently high levels of performance maintained across this area, Dublin Airport continue to emphasise that the consistent achievement of targets should not in itself lead to an increase in targets. Dublin

Airport outlined that as it continues to grow year after year, this will lead to an increase in demand on individual asset systems making the targets currently in place increasingly challenging to achieve.

- 2.3.3 In its Issues Paper Response, Dublin Airport requested consideration of aligning the availability percentages across all Asset and Baggage Metrics. This request was made in the interests of consistency and practicality.

Key points of IAA's Draft Determination

- 2.3.4 In its Draft Determination, the IAA acknowledge the high standard of asset availability that has been maintained at Dublin Airport across 2023, 2024 and 2025. As a result, the IAA have set forward amendments to certain metrics and targets. The first key change proposed by the IAA is in the reporting frequency of Passenger Facing Lists & Escalator and SSKs metrics from quarterly to monthly. The IAA state this change was suggested by IATA and Dublin Airport, with IATA claiming that a monthly measurement would allow Dublin Airport to take corrective action quicker.
- 2.3.5 The IAA also propose an increase on the rebate of all assets from €0.005 to €0.01 on the basis that failure to meet one of these targets would reflect a significant deterioration relative to current performance.
- 2.3.6 Several submissions from stakeholders, proposing the addition of new metrics and targets, were also set forward in the IAA's Draft Determination. Examples include elements of baggage delivery and airside operations as proposed by IAG, a measure of the availability of stands and airbridges as proposed by IATA and Iberia, and that the scheme should further cover baggage delivery, transfer passengers, and airside operations as requested by Vueling.

Dublin Airport's Response to the Draft Determination

Target Measurement Methodology

- 2.3.7 Dublin Airport outlined in our Issues Papers Response that we would support the alignment of the availability percentage for all Assets and Baggage metrics for the sake of consistency and applicability. Dublin Airport notes this statement referred to the consistent ask of maintaining the current targets and reporting frequencies that are in place. Therefore, the IAA's claim that Dublin Airport support the change in the reporting frequency of all asset availability targets to monthly is not the case. Dublin Airport's position, as outlined in our Regulatory Proposition remains unchanged, the current asset availability framework in place should be maintained.
- 2.3.8 While Dublin Airport acknowledges the consistent achievement of all asset availability and baggage handling performance targets throughout the current regulatory period, we strongly oppose the IAA's proposed amendments in these areas. The proposed changes do not provide

any additional incentive for operational improvement or contribute to enhancing the passenger experience.

2.3.9 We strongly oppose the change to the reporting frequency for asset availability. We believe if this change is implemented the issue of short-term volatility will heavily influence results. With challenging targets of 99% in place currently, it takes just one or two isolated incidents a month for the average score to drop below 99%. Under the current framework, Dublin Airport's resilience and consistent high operational performance allows for the achievement of these targets. The proposed change risks letting isolated events overshadow Dublin Airport's consistently exceptionally reliable performance.

2.3.10 Dublin Airport acknowledge that a high level of service must be maintained in this pivotal area, hence why a decrease in metric targets currently set at 99% was not requested in our Regulatory Proposition. With an aging asset base that will require higher asset utilisation due to the forecasted increase in passengers expected year on year, we believe the targets outlined by the IAA are operationally unattainable. As passenger numbers grow and these aging assets are utilised more frequently, the margin for failure grows smaller and smaller.

2.3.11 One of the key areas overlooked by the IAA regarding the proposed amendments to the asset availability framework is the aging infrastructure and asset base at Dublin Airport. In the regulatory period commencing in 2027, both the IAA and Dublin Airport forecast passenger growth. Despite this growth and the benefits this provides to all stakeholders involved, Dublin Airports infrastructure and asset base are steadily aging and will require significant investment just to meet the targets currently in place. Investments are being made in this area to increase units however, as these existing assets grow older, they become more susceptible to wear-out and repeated defects leading to them eventually becoming obsolete.

2.3.12 Under a quarterly reporting regime, a 99% availability target allows approximately 17.3 hours of downtime before a compliance breach occurs. Under a monthly reporting regime, this reduces to approximately 5.8 hours. The practical effect is that a single significant failure, specialist repair, OEM intervention or unavoidable component lead time could result in a monthly compliance failure despite the asset providing excellent service over the broader period and meeting passenger needs. This creates a more punitive regulatory measure rather than a more effective performance target, demonstrating how quarterly reporting better reflects asset performance.

2.3.13 The primary drivers of high standards of passenger experience are as follows:

- Asset reliability
- Speed of repair
- Quality of maintenance
- Effective asset renewal programmes
- Elimination of recurring failures

2.3.14 Changing the compliance reporting period does not directly improve any of these outcomes. An asset outage impacts passengers in the same manner regardless of whether performance is measured monthly or quarterly. Taking this into consideration, it raises the question, what additional passenger benefit is delivered by changing the compliance reporting period from quarterly to monthly? To date, there is no evidence that monthly compliance reporting will increase reliability, reduce failures, improve accessibility or enhance customer satisfaction. The IAA's proposal simply alters the reporting window. As such, the change does not inherently improve asset reliability, passenger experience or service quality, but does increase the likelihood of compliance breaches and associated financial penalties.

2.3.15 Another concern that a monthly compliance regime may unintentionally incentivise is behaviours that are contrary to good asset management practice. Where financial penalties are linked to monthly performance targets, maintenance and service providers come under increased pressure to restore assets to service as quickly as possible to avoid an immediate compliance breach. This creates a risk that the focus shifts from identifying and permanently eliminating the root cause of a failure to simply returning the asset to service within the reporting period.

As a result, maintenance providers may have insufficient time to:

- Complete comprehensive fault diagnostics.
- Undertake detailed engineering investigations.
- Identify and address underlying failure mechanisms.
- Source specialist components or OEM support.
- Implement and verify permanent corrective actions.

Instead, there is a risk from the distortionary proposed amendments of:

- Temporary repairs being favoured over permanent solutions.
- Root cause investigations being curtailed or deferred.
- Increased repeat failures and recurring defects.
- Higher lifecycle maintenance costs.
- Reduced long-term asset reliability.
- Increased operational disruption for passengers.

2.3.16 Effectively the proposal to measure these targets monthly rather than quarterly risks creating a "fix fast, investigate later" culture, where short-term compliance becomes more important than sustainable reliability improvement. Quarterly reporting provides maintainers with sufficient time to undertake proper engineering analysis, implement robust corrective actions and return assets to service with confidence that the underlying issue has been resolved. This is more consistent with recognised asset management principles which prioritise whole-life performance, resilience and continuous improvement.

2.3.17 Under the IAA's proposed framework, this would require significantly greater monitoring and intervention as a monthly measurement for such high targets leaves little to no scope for underperformance. It's clear that if an increase to the measurement frequency across all targets

was introduced, additional FTEs would be required to oversee asset availability and performance management on an ongoing basis. The implementation of this proposal leaves no room for underperformance which is why additional FTEs would be required and with this the necessary Opex and Capex must be awarded to Dublin Airport.

2.3.18 Following the IAA's proposal to increase the measurement frequency of all assets from quarterly to monthly, Dublin Airport reached out to KONE, our PSE service provider for T2 assets to receive an estimate on the potential cost increase associated with the proposed amendment. KONE outlined the necessary changes and additions which must be implemented to meet these targets, highlighting that it would require an additional 6 full-time engineers to ensure target compliance, amounting to an additional cost of €900,000 per annum. This significant increase in cost for a change which may appear minor is essential in maintaining the current target of 99% availability of all assets monthly. For example, T2 passenger facing lifts and escalators will require 24/7 connected elevator monitoring systems leading to the required addition of staff increasing employment from 2 to 8 full-time engineers.

2.3.19 A significant factor driving the need for additional engineers and 24/7 monitoring of assets is the age of Dublin Airports existing asset base. As referenced on several occasions throughout this section, the aging asset base at Dublin Airport presents one of the most significant challenges to maintaining these targets. While Dublin Airport remains committed to the investment and expansion of assets under CIP27, including additional A-VDGS, FEGP and PSE assets, these measures will not eliminate the operational pressures associated with sustaining current performance levels. With the targets in place currently already stretching the Airport to its operational limits, any tightening of such targets will not be possible to maintain with the assets and funding currently in place.

2.3.20 To consistently achieve monthly availability targets, additional expenditure is likely to be required through:

- Increased maintenance coverage and response resources.
- Enhanced OEM support arrangements.
- Greater critical spare holdings.
- Additional contract management and performance assurance activities.
- More frequent reporting, governance and compliance reviews.

2.3.21 These costs will ultimately be borne by airport users and passengers. Any increase in operational expenditure should be supported by clear evidence of improved passenger outcomes, which has not been demonstrated.

2.3.22 The challenge becomes more significant as the airport's asset base expands. For example, the number of Fixed Electrical Ground Power (FEGP) units is expected to grow substantially in the coming years with the asset base to increase to 120 from 60 units. Applying a monthly compliance regime across all assets with a growing asset portfolio will increase

reporting requirements, investigations, governance activity and administrative effort without necessarily improving overall service performance. The regulatory framework should encourage investment in reliability, resilience and asset stewardship rather than increased compliance administration.

2.3.23 Dublin Airport supports enhanced transparency and accountability through quarterly regulatory compliance assessment, monthly internal performance monitoring and trend reporting. Exception reporting for underperforming assets and root cause analysis for significant or recurring failures will have much more beneficial impact on passenger experience than a change to a monthly reporting frequency. Dublin Airport is committed to implementing continuous improvement programmes focused on reliability and passenger impact. This approach provides regulators with greater visibility of performance trends while avoiding unintended behaviours, distortions and unnecessary cost burdens creating a more balanced alternative regarding asset availability measurement monitoring.

Rebate Increases

2.3.24 Dublin Airport oppose the IAA's proposal to increase the rebate of all targets from €0.005 to €0.01. This proposed increase in rebate coupled with the proposed monthly measurement for all asset availability targets, is significantly more challenging and far more severe despite Dublin Airport's current constant high performance in this area. When accounting for Dublin Airports aging asset base and forecasted increasing passenger numbers, this leads to higher utilisation of these aging assets and creates a far lower margin for failure. As a result, these changes are unsustainable and would be impossible to maintain throughout the coming regulatory period.

Additional Metrics Proposed

2.3.25 Regarding stakeholder proposals on additional new metrics and targets that should be introduced, Dublin Airport supports the IAA's decision to reject all proposals. Metrics proposed such as additional airside and baggage delivery metrics are unnecessary and disproportionate. As acknowledged by the IAA baggage delivery is already assessed under the current regulatory framework and such metrics are not solely in Dublin Airports control with third parties such as airlines playing a significant role in such operations. Similarly, the additional airside metrics proposed lack sufficient detail and as acknowledged by the IAA would be disproportionate to introduce a metric which penalises Dublin Airport based off infrastructure limitations. In relation to these proposals Dublin Airport are strongly opposed to any such metrics being introduced in the coming Regulatory period.

Conclusion

2.3.26 While targets should be ambitious, they must be balanced and allow for operational variability. Targets set at or near 99% already leave little to no room for disruption or system variability, which is inherent in any complex operation. Introducing further stretching targets such as increasing the reporting frequency from quarterly to monthly risks diverting focus away from passenger-centric outcomes and towards target compliance. The IAA must consider not only the current, but also the future airport environment, in terms of technology lifespan and the existing aging systems in place. Assets will only slow down, therefore further stretching targets

are not in line with projected performance. With Dublin Airport already operating near asset capacity and growing passenger numbers, increasing the difficulty in achieving asset availability targets is unlikely to enhance performance, undermining the aim of the service quality regime.

Table 3. Asset Availability & Baggage Handling Proposals

Asset Availability	Current target	Current Price Cap at Risk	Dublin Airport Proposed Changes	IAA Draft Determination Proposed Changes	Dublin Airport Draft Determination Response
FEGP	99% For new units, 93.5% available on average in the first year	<98%: Monthly:- €0.01 >=98% but <99%: Monthly: - €0.005	No Proposed Changes	All Assets Measured Monthly Monthly Rebate of -€0.01	Reject the IAA's Proposed Changes
AVDGS		<98%: Monthly: - €0.01 >=98% but <99%: Monthly:- €0.005			
T2 Passenger Facing Lifts & Escalators	99%	<98%: Quarterly:- -€0.01 >=98% but <99%: Quarterly:- -€0.005			
SSKs	99%	<98%: Quarterly:- €0.01 >=98% but <99%: Quarterly:- -€0.005			

2.4 Passengers with Reduced Mobility (PRM)

Overview of performance

2.4.1 Passengers with Reduced Mobility (PRM) services have consistently delivered strong performance in recent years, with all wait time targets for PRMs being met in 2023, 2024, and 2025. This is a significant improvement on previous years. This improvement can also be seen from airline responses highlighting significant enhancements in the service delivery of our provider.

2.4.2 Dublin Airport gained invaluable insight from PRMs on their experiences with Dublin Airport, both at the first meeting of the PAG in January 2026 and Dublin Airport's Accessibility

Forum held in December 2025. Passengers shared what they would like to see in the future and what improvements could be introduced to further improve the passenger journey, ensuring a safe and secure airport experience is accessible to all. This was pivotal to our SQM proposal as part of the Regulatory Proposition, ensuring the passenger focus was retained at the centre of the regime. This also forms the basis for upcoming improvement projects in 2026, which continue into 2027.

2.4.3 In 2025, in addition to the improvement of pre-notification rates, substantial investments were undertaken in bettering PRM facilities. This highlights Dublin Airport's forward-looking approach to continuous improvement and the ongoing enhancement of service stands. These include:

- Clearly marked PRM seating at all departure gates
- Upgraded PRM reception areas
- A new pet relief room
- Upgraded PRM washrooms
- New Changing Places facilities
- Upgraded help points across the terminals and campus
- New assistance waiting areas
- A designated taxi waiting area for PRM passengers
- Replacement of stairs with ramps to improve step free access

2.4.4 The above projects address some of the concerns raised by the members of the PAG. We also have further projects in place for 2026 to cover other essential areas for PRMs including:

- Upgrading washrooms to make them stoma friendly (ongoing)
- Introduced 2 aviramps to the operation as part of new PRM contract
- Completed Irish Deaf Society training with members from across the whole business attending
- Further Irish Guide Dog training for staff scheduled for October
- Developing Visual Guides for Passengers with autism for both departure and arrival journeys

Key points from the Issues Paper Response and Regulatory Proposition

2.4.5 As outlined in both our Issues Paper Response and Regulatory Proposition, a more challenging Service Level Agreement (SLA) was introduced as part of the new contract agreed with our service provider, OCS, following competitive tender which Dublin Airport users were involved in. Dublin Airport noted in the Regulatory Proposition that in the previous 2022 Determination SLAs were also stretched upwards and we requested that the IAA targets be increased to match this. We did not repeat this ask for the 2026 Determination.

2.4.6 The Regulatory Proposition explained that in the current context of the 2026 Determination, moving to a 100% target is not practical nor beneficial. A 100% target leaves no allowance for anomalies or unforeseen operational issues that can arise within the PRM service at Dublin Airport that are outside our control. With the increasing uptake for PRM services and growth in overall passenger demand, an increase in the IAA targets would not be feasible nor positively influence the PRM service performance. Growing demand, growing passenger numbers as well as the aging population are all factors that put a strain on the PRM operation, this pressure will only increase throughout the regulatory period.

2.4.7 In Dublin Airport's Issues Paper Response and Regulatory Proposition, no change was proposed to the objective PRM metrics. An increase to the PRM wait time targets would impose a disproportionate risk of breach driven largely by the operational factors outside the service provider's control such as late or non-advised passengers, gate changes or airline originating operational challenges.

2.4.8 Dublin Airport's Regulatory Proposition also outlined the merit of introducing joint metrics for both airport-airline performance, considering the impact both parties have on the PRM operation. The role the airline plays in pre-notification rates must be considered. Introducing a bonus as part of the PRM pre-notification rates would also be beneficial to the passenger and in driving performance upward. Dublin Airport also noted in the Regulatory Proposition that the PAG relayed no objectives to the retention of the PRM metrics as they currently stand.

Key points of IAA's Draft Determination

2.4.9 In relation to the increased SLA for Dublin Airport's PRM service provider, where the new metrics now stand at 100% targets, the IAA acknowledge that continuing the approach from the previous Determination would require meeting a number of 100% targets on an annual basis. The IAA acknowledge the difficulty in achieving this, a single missed assistance target would mean that the metric is failed for the year.

2.4.10 The new PRM SLA 'scorecard' was outlined by the IAA in their Draft Determination. They note another possibility would be to use the scorecard pass rate as the basis for PRM target setting. The IAA compared the SLA targets against the ECAC guidelines for PRM assistance, it was determined that the SLA is considerably more challenging, with 100% targets.

2.4.11 The IAA's Draft Decision on PRM is as follows:

- Where the SLA contains a 100% target, the IAA propose instead to use the midpoint of the range between that target, and the current 98% target. Hence, a 99% target is proposed.
- Balancing this, the IAA suggest that the PRM targets and rebates of €0.01 will now be applicable on a quarterly, rather than annual basis. This means a rebate would be payable for each quarter where a target is missed.

- The IAA also propose to set a separate annual rebate target in respect of achieving the 80% pass rate in the scorecard. That is, if the overall 80% pass rate is missed, an annual rebate of €0.01 will separately apply.

2.4.12 The IAA note they will not reintroduce the ‘backstop’ target as was done in 2022. This target was introduced in relation to the underperformance seen in the years previous, this trend was not repeated in the current period.

2.4.13 In relation to Dublin Airport’s suggestion that there be a bonus available for high pre-notification rates, the IAA note that this bonus may be counterproductive in terms of obtaining airline cooperation, if the reward for doing so would be that Dublin Airport would be entitled to charge an increased airport charge.

Dublin Airport’s Response to the Draft Determination

2.4.14 Dublin Airport does not support the increase of compliance targets from 98% to 99%. The proposed increase appears to be based on aligning the regulatory targets with increased targets in the service provider’s contractual SLA. Alignment between the two would risk importing commercial stretch targets into the regulatory regime without demonstrating that such targets are achievable on a consistent basis under normal operating conditions or that they would deliver a material improvement in passenger outcomes.

2.4.15 From a regulatory perspective, the proposed increase from 98% to 99% represents a significant tightening of the current SQM standard, reducing the level of permitted non-compliance by 50%. At current traffic levels, the difference between achieving 98% and 99% performance can be attributable to a small number of operational occurrences, including non-advised passengers presenting for assistance, flight delays, aircraft stand changes, gate reallocations, late disembarkation approvals, or multiple simultaneous demands on the service. These are inherent features of a live airport operation and are not always within the direct control of either Dublin Airport or the PRM service provider. As a result, the proposed increase would materially increase compliance risk while offering limited evidence of a proportionate passenger benefit.

2.4.16 Dublin Airport does not support the inclusion of contractor scorecard measures within the SQM regime. The PRM supplier scorecard is a commercial management tool containing commercially sensitive information, designed to evolve over time to reflect a broad range of operational priorities, not all relating to passenger facing outcomes. The scorecard was never intended for public reporting nor regulatory oversight. Incorporating it into the regulatory framework would inappropriately blur the distinction between regulating passenger outcomes and regulating the airport’s internal contractual arrangements. The SQM regime should focus on transparent, passenger-facing measures rather than the commercial mechanisms used by the airport to manage its suppliers.

2.4.17 Dublin Airport accept the IAA’s change to the PRM reporting frequency, changing from reporting annually to quarterly, with €0.01 being at risk per quarter.

2.4.18 Dublin Airport agree with the IAA decision to omit a ‘backstop’ target from the PRM wait time targets for the next regulatory period.

Conclusion

2.4.19 Dublin Airport does not agree with the IAA's overall Draft Determination proposal in relation to the PRM targets. The proposed tightening of targets to this level cannot be delivered consistently within the current operating environment, particularly given that the proposal does not provide for the additional operating expenditure required to achieve and sustain this standard of performance. Furthermore, the inclusion of a commercial scorecard within the SQM regime undermines the purpose of the framework. Combining commercial performance measures with service quality metrics is inappropriate, as they assess fundamentally different objectives. Linking these measures risks creating conflicting incentives and may divert focus and resources away from the core service delivery needs of PRM passengers, ultimately to the detriment of the passenger experience.

Table 4: PRM proposals

Passengers with Reduced Mobility:	Current Target	Price Cap at Risk	IAA Proposal	Dublin Airport Proposal
Assistance from an external point within the airport campus to terminal reception point (departing passengers)	Pre-Advised: 98% within 10 min Non-Pre-Advised: 98% within 20 min	€0.01 Annually	Pre-Advised: 98% within 10 min, 99% within 20 min Non-Pre-Advised: No Changes Proposed	-Accept quarterly measurement frequency -Reject proposed 98% to 99% target increases
Assistance from the terminal reception point onwards (departing passengers)	Pre-Advised: 95% within 15 min, 98% within 20 min Non-Pre-Advised: 95% within 20 min, 98% within 30 min		Pre-Advised: 95% within 15 min, 99% within 20 min Non-Pre-Advised: 95% within 20 min, 99% within 30 min	
Assistance from aircraft to terminal holding point onwards (arriving passengers)	Pre-Advised: 93% within 10 min, 98% within 15 min Non-Pre-Advised: 93% within 15 min, 98% within 20 min		Pre-Advised: 93% within 10 min, 99% within 15 min Non-Pre-Advised: 93% within 15 min, 99% within 20 min	
			Separate overall annual target of 80%	Reject IAA's proposal

3. Subjective Metrics

Introduction

- 3.1.1 In Dublin Airport's service quality regime, subjective metrics are measures of service quality that rely on passengers' perceptions and experiences rather than directly observed operational data. They are assessed through passenger surveys, which are conducted by Dublin Airport's behavioural insights business partner, Red C, and capture areas such as Overall Satisfaction, Cleanliness, Wayfinding, Comfort, and Staff Helpfulness, reflecting how passenger experience the airport's services rather than how the services perform against objective operational standards. In these surveys the focus is on key drivers and touchpoints of passenger satisfaction.
- 3.1.2 Dublin Airport has gained valuable insight into the key drivers of passenger satisfaction through the Punish Reward Analysis Matrix (PRAM) analysis undertaken by Red C. This analysis assesses all 68-departure metrics and 29-arrival metrics, including both reported and monitored measures, and ranks them according to their importance in influencing overall passenger satisfaction. Each metric is treated as a driver of satisfaction, reflecting its role in shaping passengers' perceptions and future behaviour. Understanding the relative importance of these drivers is critical in prioritising investment, strategy and operational focus. It ensures resources are directed towards the aspects of the passenger journey that matter most so that passenger priorities remain at the centre of the regulatory regime.
- 3.1.3 The IAA referred to the PRAM regression analysis of 2022 in their Issues Paper. This analysis is shared as an appendix to Dublin Airport's response to the Draft Determination. Dublin Airport believe the IAA should take this analysis into account when assessing the New Metrics Proposal set out in the Draft Determination. The analysis demonstrates that many of the proposed metrics are not central to the passenger journey and do not relate to the factors that passengers typically consider most important when evaluating their overall airport experience. As a result, there is a risk that regulatory focus and resources are directed towards areas that deliver limited value from a passenger perspective, while more significant drivers of passenger satisfaction receive less attention.

The limits of subjective passenger satisfaction

- 3.1.4 It is essential to recognise the limitations of subjective metrics. Passenger satisfaction is influenced by individual expectations, preferences, and personal experiences, meaning that passengers undertaking similar journeys may form very different views of the service received. As outlined previously, consumer vulnerability can also greatly impact passenger perception.
- 3.1.5 Achieving marginal improvements in passenger satisfaction scores often requires disproportionate investment, yet increased investment does not necessarily translate into higher scores or improved passenger sentiment. Shifting passenger perceptions is a long-term process measured in years rather than quarters, and even a 0.1-point increase can be challenging to achieve. There are many factors that are not limited to Dublin Airport's direct control that affect

a passenger's perception of a touchpoint, this adds to the difficulty of improving subjective metrics.

- 3.1.6 There is also a risk of target inflation, where increasingly ambitious targets deliver little to no additional benefit for passengers while unfairly penalising a mature, high-performing airport. As performance levels increase, scores naturally plateau, creating diminishing returns where substantial effort yields minimal measurable improvement. Cultural, behavioural and survey-response biases also limit the proportion of passengers who will award a perfect score, regardless of the quality of service received.
- 3.1.7 Survey results are derived from a sample of passengers, 8,500 interviews in total made up of 5,800 departures and 2,700 arrivals. As such, satisfaction scores should be primarily interpreted as a measure of passenger perception rather than a precise assessment of overall service quality. Given the inherent subjectivity of the metrics, the appropriateness of linking financial incentives to passenger satisfaction warrants thorough evaluation. Considering the degree of operational control over outcomes, the robustness of the measure, and whether the resulting incentives are likely to deliver meaningful benefits for passengers is necessary. Not all metrics which are currently monitored within the passenger satisfaction surveys are suitable for the application of financial incentives. In some cases, there is no mechanism to ensure that the provider or responsible party is either penalised for failing to meet a target or rewarded for exceeding it. As a result, linking financial incentives to such metrics is unlikely to drive behavioural change or service improvements. Where accountability and influence over outcomes are not clearly aligned, the incentive becomes ineffective and ultimately delivers little to no benefit to passengers.
- 3.1.8 Service quality metrics should not act solely as compliance tools. They should function as proxies for passenger value, supporting a stable experience even during disruption. To do this effectively, the regime must allow space for operational response and recovery.
- 3.1.9 Passenger survey responses can be influenced by cultural differences in how people use rating scales. Some cultures are more likely to select extreme ratings, while others tend to choose more neutral or moderate responses. In addition, passengers may have different expectations and benchmarks based on their experiences of other airports. Language differences can also affect how survey questions and response options are interpreted. As a result, differences in survey scores may not always reflect differences in service quality alone.
- 3.1.10 Survey research generally recognises that customer satisfaction scores are subject to a ceiling effect, where there is limited scope for respondents to award higher ratings even when service quality improves. Achieving scores significantly above 9.5 would require a substantial proportion of passengers to award ratings of 9 or 10, which may become increasingly difficult due to the way respondents use rating scales rather than reflecting the quality of the passenger experience alone. Therefore, Dublin Airport would caution against increasing any satisfaction target above 8.5, let alone setting bonus targets at 9.5. Such a target would require near-unanimous ratings of 9 or 10 from passengers and leaves very little room for the natural variation

that exists in survey responses. Consequently, a target of 9.5 risks being disconnected from what can reasonably be achieved in passenger research, even where service standards are consistently high.

3.2 Passenger Satisfaction

Overview of recent performance

- 3.2.1 High performance has been achieved since 2023 in many passenger satisfaction metrics, with outperformance in several of those metrics. This improvement in performance has been seen while passenger numbers through Dublin Airport have risen by 9% between 2023 and 2025. Across the metrics, more bonuses are being achieved than breaches accumulated. This is not to suggest that the bonus performance levels are not challenging. Rather it demonstrates that significant resources and investment have been consistently directed towards the service quality regime, enabling performance improvements that have translated into enhanced passenger experience and higher levels of passenger satisfaction.
- 3.2.2 On the lesser-performing metrics, Information on Ground Transport and Cleanliness of Washrooms, there has been significant investment and improvement however, this investment has reached its practical limit. These targets due to the disproportionately challenging level they are set at, are falling short of incentivising better outcomes despite full resourcing, investment, and operational focus. These are the only passenger satisfaction metrics that have consistently breached their targets. This lower performance has been evident since 2023, with Information on Ground Transport breaching its target in every quarter since 2023. Cleanliness of Washrooms showed some improvement in 2024, with only one breach in Q2, but returned to its typical performance in 2025 with breaches in both Q2 and Q3. Historically, Cleanliness of Washrooms has breached its target in Q2 and Q3 of each year, with 2024 being the exception. This is largely a result of the congestion experienced during the peak summer period, as well as increased passenger volumes and demand at peak times. We believe these breaches are likely to extend to all quarters as passenger growth continues, with traditionally off-peak periods beginning to experience demand levels more consistent with peak periods.

Table 5. Passenger Satisfaction Metrics 2025 Performance

CATEGORY	METRIC	Target	Bonus	Departures				Arrivals				Transfer	PRMS	
				Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4		2025	2025
Passenger Care €0.07 max (penalty / bonus)	Overall satisfaction	8.5	9.3	8.8	8.6	8.7	8.7	9.2	9.1	9.2	9.1	8.8	9.0	
	Courtesy and helpfulness of airport staff	8.5	9.3	8.9	8.9	8.9	9.0						9.3	
	Courtesy and helpfulness of security staff	8.5	9.3	8.9	8.7	8.8	8.9						9.3	
	Overall cleanliness of the airport terminal	8.5	9.2	8.7	8.6	8.6	8.7	8.9	9.0	8.9	9.0		8.9	
	Cleanliness of washrooms	8.5	9.2	8.6	8.4	8.4	8.5	9.0	8.7	8.6	8.5		8.8	
	Departure Gates	8.0	9.0	8.5	8.3	8.4	8.4						8.6	
	Ease of Movement	8.0	9.0	8.7	8.5	8.6	8.6	8.9	8.9	8.8	9.0	8.6	8.5	
	Additional Assistance	9.0	9.5										9.4	
Passenger Information €0.04 max (penalty / bonus)	Finding your way around	8.5	9.0	8.9	8.7	8.8	8.8	9.0	8.9	9.1	9.0	8.7	8.9	
	Flight information screens	8.5	9.0	8.9	8.9	8.9	8.8					8.8	8.8	
	Info on Public Transport on Arrival	8.5	9.0					8.2	8.1	7.9	8.1			
Passenger Facilities & Service €0.04 max (penalty / bonus)	Availability of Baggage trolleys	8.5	9.0	8.9	8.7	8.8	8.8	9.4	9.0	9.0	9.1		*	
	Satisfaction with free Wi-Fi	8.5	9.0	9.2	9.0	8.9	8.9	9.3	9.1	8.9	9.0		*	
	Facilities for those requiring additional assistance	9.0	9.5										9.2	

Key points from the Issues Paper Response and Regulatory Proposition

3.2.3 In Dublin Airport's Regulatory Proposition, no change was proposed to the following metrics:

- Additional assistance
- Helpfulness of security staff
- Helpfulness of airport staff
- Overall satisfaction
- Departure gates
- Ease of movement
- Finding your way around
- Flight information screens
- Facilities for passengers who require additional assistance
- Availability of trolleys
- Satisfaction with Wi-Fi

3.2.4 Dublin Airport believes the above metrics are set at an appropriate level for the current operating environment at Dublin Airport. They are becoming increasingly challenging to achieve, and we expect this trend to continue as capacity and operational constraints intensify. Any further increase in the targets or bonus thresholds associated with these metrics would risk becoming detached from the realities of the airport's operating environment.

- 3.2.5 In Dublin Airport's Response to the Issues Paper, the IAA were asked to consider a review of subjective satisfaction score targets to better reflect typical passenger response patterns and the inherent limitations of survey-based metrics. Dublin Airport does not believe this has been adequately reflected in the IAA's Draft Determination. Instead, the proposed approach appears to move in the opposite direction by placing greater emphasis on subjective measures despite the concerns raised regarding their suitability, reliability and achievability as performance metrics. As stated above, the link between the achievability of a metric and the funding required must be recognised to support a realistic and high performing service quality regime.
- 3.2.6 In the Regulatory Proposition, Dublin Airport shares our support for the existing Cleanliness of Terminal target, however the bonus target of 9.2 is operationally unattainable. Achieving such a score would require near-perfect results during non-peak months and virtually no seasonal variation. This is an unrealistic expectation in an environment where passenger behaviour, congestion and usage patterns fluctuate significantly.
- 3.2.7 Dublin Airport requested a reduction to both Information on Ground Transport and Cleanliness of Washrooms metrics in the Regulatory Proposition. For Cleanliness of Washrooms the current target is 8.5, this was requested by Dublin Airport to be reduced to 8.0, as well as moving the current bonus of 9.2 to 8.7. The current target and bonus in place do not reflect seasonal variance or the external factors that impact passenger perception.
- 3.2.8 For information on Ground Transport the current target is 8.5, Dublin Airport requested that this be reduced to 8.3 as well as the bonus being decreased from an existing score of 9 to 8.8. These requests are essential to ensure that performance targets accurately reflect operational realities and are set at a level that can drive meaningful improvement without penalising factors outside Dublin Airport's control.
- 3.2.9 The Regulatory Proposition underscored that both ADP and Heathrow have an understanding within their QoS regime of their bounds of control. They only have financial penalties associated with metrics that are directly within their control.
- 3.2.10 Our Regulatory Proposition requested to remove the online survey element of the 'On my way' passengers as it is no longer relevant to the current environment, the face-to-face surveys provide more accurate and relevant responses. Dublin Airport emphasised the increasing difficulty in meeting Availability of trolleys metric as a result of changing regulation requiring further trolley screening as well as growing passenger numbers driving overall demand.
- 3.2.11 In paragraph 11.2.8 of Dublin Airport's Issues Paper Response, support for the inclusion of additional new metrics was outlined, these being metrics that are supported by customer research and are trilaterally consulted with the PAG.

Key points of IAA's Draft Determination

3.2.12 The IAA stated they reviewed the existing service quality regime to ascertain whether current targets and bonuses appropriately capture the passenger experience and satisfaction. In turn, the IAA proposed:

- For metrics where Dublin Airport has not either hit a bonus or rebate in any quarter of 2025, to keep the existing bonus and rebate targets unchanged.
- For metrics where Dublin Airport has hit a bonus threshold in any one quarter of 2025, increase the bonus threshold to 0.1 above the maximum score achieved by Dublin Airport within any part of 2025 performance. The outturn evidence suggests that more challenge is appropriate. In most cases the IAA also increase the rebate threshold accordingly, with the exceptions of Wi-Fi, and baggage trolleys, where the IAA note that there is a relatively narrow spread between the bonus and rebate thresholds, relatively high thresholds, and some volatility in performance, so the IAA propose to leave those rebate thresholds unchanged at 8.5.
- For metrics where Dublin Airport has failed to meet a rebate threshold target in any one quarter of 2025, the IAA will consider what achievability adjustment should be made.

3.2.13 The IAA considered an achievability adjustment for the Information on Ground Transport metric as well as the Cleanliness of Washrooms. This is outlined in the below paragraphs.

3.2.14 Based on discussions with the PAG, the IAA determined Dublin Airport's request for the reduction on the Information on Ground Transport metric to be reasonable. Significant improvement has been seen in the metric, with investment and resources being utilised at capacity with the target still not being met. The IAA also appreciate that this metric is affected by passenger perception of public transport itself, which is out of Dublin Airport's control and scope of improvement.

3.2.15 Conversely, in relation to Cleanliness of Washrooms, Dublin Airport's proposal of reducing the metric was not accepted by the IAA. Based on recent performance, missing the target in Q2 and Q3 with a score of 8.4, the IAA does not believe that a target of less than 8.4 should be considered. The IAA also noted an inconsistency within Dublin Airport's Regulatory Proposition, where its cleaning cost forecasts contains a line item linked to achieving a score of 8.5. Cleaning standards at Dublin Airport were compared to other airports by the IAA considering the 2025 performance under the ACI ASQ surveys. The IAA note that Dublin Airport is closely in line with the average scores across European airports, when considering scores among its current size category (25-40 mppa) Dublin Airport is slightly behind the average score. Considering this, the IAA do not see evidence to suggest that cleanliness of washroom targets for Dublin Airport are high.

3.2.16 The IAA have reviewed the metrics of the current scheme to determine if all areas of passenger satisfaction have been adequately captured and have therefore identified seven metrics that they believe are good candidates to be added to the current SQM framework.

3.2.17 These new metrics have been chosen by the IAA based on the following criteria:

- An analysis of the ‘menu’ of metrics not currently included in the SQM regime but monitored by Dublin Airport.
- Suggestions from stakeholders in their response to the Issues Paper, and from discussions with the PAG; though Dublin Airport notes the minute of the IAA’s PAG meeting almost exclusively surrounded accessibility² – which does raise questions as to whether some of unrelated to accessibility metrics the IAA has proposed are of materiality to the PAG. Support does not equate to it being a priority for the PAG.
- Seeking to identify areas of the airport experience which may be overlooked by the current metrics.

3.2.18 The IAA note that the PAG expressed support for the addition of metrics on satisfaction with Bus transfers from aircraft, Lounge satisfaction and Comfort of the gate area – though again the minutes of the meeting suggest these were not the core areas of concern or interest to the PAG, in turn raising doubts as to whether the PAG has identified any shortcomings with the current SQM regime and in turn if regulatory intervention through the inclusion of new metrics is necessary. These metrics were proposed by the IAA as new metrics along with the following metrics:

- Overall satisfaction with car park
- Sense of security
- Food outlets
- Cleanliness of departure gates

3.2.19 The IAA proposed new target threshold is to be set 0.3 below 2025 average score, except for Cleanliness of Departure Gate, which is to be set in line with other cleanliness targets at 8.5. Bonus threshold is to be set at 0.5 above 2025 average score.

3.2.20 The IAA have no issue with removing the online survey element of the ‘On my way’ passengers. This methodology change does not need to be specified as part of the determination but can be amended as needed on a continuous basis, subject to approval by the IAA.

3.2.21 The IAA responded to the comment made by Dulin Airport in the Regulatory Proposition on the fact that ADP airports only including financial incentives on metrics directly within the airports control³, and stated that they believe that this aligns with their approach.

3.2.22 The IAA also note that they do not propose to reintroduce the ‘walking distance’ metric.

² [pag-minutes---meeting-2.pdf](#)

³ [groupe-adp-2027-2034-economic-regulation-agreement](#)

Dublin Airport's Response to the Draft Determination

3.2.23 The IAA states in the Draft Determination, rebate targets should be achievable, while bonus targets should remain challenging (paragraph 12.59). However, the Draft Determination is inconsistent with this objective, particularly in relation to the Cleanliness of Washrooms metric. Given the current operating environment, characterised by high passenger volumes, peak demand and congestion, the proposed target is not achievable. This position is unlikely to change during the next regulatory period and the reduced Opex allowance proposed by the IAA will only increase the risk of breach. This demonstrates the clear and necessary link between achievability and funding within the service quality regime. Dublin Airport has consistently struggled to achieve the existing target despite significant investment, increased cleaning resources and objective audit evidence demonstrating high levels of compliance. Maintaining a historically unachievable target while simultaneously reducing the funding available to support cleaning activities contradicts the principle that rebate targets should be achievable.

3.2.24 Dublin Airport agrees with the decision to make no change to the metrics that did not achieve a bonus or rebate in 2025, with the exception of Cleanliness of Washrooms. We believe this metric must be reduced as it is operationally unachievable in the long-term, from a consistency and operational reality viewpoint. The metrics that did not achieve a bonus in 2025 that have no change include:

- Overall Satisfaction
- Overall Cleanliness of the Airport Terminal
- Departure Gates
- Flight Information Screens
- Facilities for Those Requiring Additional Assistance

Changes to Existing Metrics: Maximum Score Increased by 0.1

3.2.25 We believe that an increase of 0.1 above the max score achieved in 2025 is disproportionate for the metrics that achieved a bonus in 2025. Dublin Airport is investing significant resources into the meeting of these metrics; operations are at full capacity and any higher allocation of investment cannot be afforded, therefore an increase to targets cannot be implemented. The highest score achieved cannot become the new qualifying standard, it is operationally impossible to perform at this high standard all year round.

3.2.26 The metrics this increase affects are outlined in the below table.

Table 6. Metrics that achieved a bonus in 2025: IAA Draft Determination Proposed Target and Bonus Increase

Metric	Current Bonus Threshold	Current Rebate Threshold	Highest score in 2025	IAA Proposed Bonus Threshold	IAA Proposed Rebate Threshold
Helpfulness of airport staff	9.3	8.5	9.3	9.4	8.6
Helpfulness of security staff	9.3	8.5	9.3	9.4	8.6
Finding your way around	9.0	8.5	9.1	9.2	8.7
Ease of movement	9.0	8.0	9.0	9.1	8.1
Availability of baggage trolleys (Only bonus increased)	9.0	8.5	9.4	9.5	8.5
Satisfaction with free Wi-Fi (only bonus increased)	9.0	8.5	9.3	9.4	8.5
Ground transport information on arrival	9.0	8.5	8.2	8.8	8.3

3.2.27 Aging infrastructure and assets, as well as growing passenger numbers makes meeting the current target increasingly challenging as time goes on. Therefore, these continuously stretching metrics are unsustainable. For some metrics, the level of increase is disproportionate to the current operational constraints. This can divert resources toward meeting rigid thresholds rather than improving the passenger experience. The bonus increases to the metrics, Availability of trolleys and Satisfaction with Free Wi-Fi are completely unattainable and much too large of an increase. 0.5 and 0.4 increases are completely disproportionate and scores of 9.4 and 9.5 are not usually achieved and would not be typical responses from passengers considering the limitations of subjective surveys.

3.2.28 Using our highest 2025 performance score as the benchmark is not realistic. It does not represent a level of performance that can be consistently achieved across all passengers, services and operating conditions. Treating these improved scores as the benchmark is unreasonable as it effectively means Dublin Airport is being challenged by its own success in delivering strong scores during a record passenger volume year in 2025. Furthermore, customer satisfaction metrics are inherently subjective. Survey response behaviours mean that, regardless of service quality, a proportion of passengers are unlikely to provide ratings at the highest levels. As a result, our peak 2025 score should not be used as the qualifying threshold for incentives, particularly where the proposed threshold exceeds that score. As shown in the table below, the amended rebate and bonus thresholds proposed are disproportionate making bonuses near impossible to achieve and the likelihood of incurring rebates every quarter high.

Table 7: Dublin Airport's historical performance in metrics where target increases have been proposed

Metric	IAA Proposed Rebate	IAA Proposed Bonus	Highest Score 2025 (Dep)	Highest Score 2025 (Arr)	Average Score 2025 (Dep)	Average Score 2025 (Arr)
Helpfulness of airport staff	8.6	9.4	9.0 (Q.4)	N/A	8.9	N/A
Helpfulness of security staff	8.6	9.4	8.9 (Q.1,4)	N/A	8.8	N/A
Finding your way around	8.7	9.2	8.9 (Q.1)	9.1 (Q.3)	8.8	9.0
Ease of movement	8.1	9.1	8.7 (Q.1)	9.0 (Q.4)	8.6	8.9
Availability of baggage trolleys	8.5	9.5	8.9 (Q.1)	9.4 (Q.1)	8.8	9.1
Satisfaction with free Wi-Fi	8.5	9.4	9.2 (Q.1)	9.3 (Q.1)	9.0	9.1

3.2.29 Where a target is consistently achieved and incentive payments are earned, the target is typically stretched to a more challenging level. The same principle should be applied in reverse. Where performance has consistently fallen short of a target, that target should be reassessed and adjusted accordingly to reflect achievable and sustainable levels of performance. Applying this principle only in one direction risks creating targets that are disconnected from operational reality and undermines the credibility of the incentive framework. The continued failure to meet targets provides no benefit to passengers, particularly where the maximum level of investment and improvement projects has already been delivered.

3.2.30 There is not always a correlation between spend and passenger experience. Increasing resources and investment has a limit on its effect on passenger satisfaction. Passengers don't notice the difference in a 0.1 score change and it takes significant effort that would be better used in areas of greater passenger perception. This point was outlined previously under the practical limits of subjective metrics. Again, this is another demonstration of where decisions are made where passenger needs are not considered and contextualised effectively.

3.2.31 Lastly, the IAA has not allowed for any cost allowance or adjustment for these metric's more stretching target and bonus threshold. This is especially relevant to where there is a significant difference between the current standard and proposed IAA increase, Availability of baggage trolleys has an increase of 0.5 to the bonus threshold as well as Satisfaction with free Wi-Fi with a 0.4 increase to the bonus threshold. With no extra cost allocation or resilience adjustments there is nothing to help manage the achievability of these demanding scores. An inevitable drop in performance in future periods can be expected in response to growing passenger numbers, paired with stagnant infrastructure, resulting in breaching of targets with no mechanism for improvement.

Helpfulness and Courtesy of Airport and Security Staff

3.2.32 Regarding the proposed increase to the target and bonus threshold for both metrics Courtesy and Helpfulness of Security Staff & Courtesy and Helpfulness of Airport Staff metric, the increase to both the target and bonus is plus 0.1, bringing the target from 8.5 to 8.6 and the bonus from 9.3 to 9.4. The inclusion of these metrics in this section is incorrect as neither of these metrics achieved a bonus in 2025. The IAA outline the highest score in 2025 as 9.3, which is the bonus threshold. Dublin Airport wish to confirm the highest score achieved in 2025 for Courtesy and Helpfulness of Airport Staff was 9.0. The highest score of the Courtesy and Helpfulness of Security Staff metric was 8.9. Therefore, the target and bonus for these metrics should not be increased in line with the IAA methodology for metrics that did not achieve a bonus in 2025.

Finding your way around

3.2.33 Dublin Airport does not consider it appropriate to increase the rebate and bonus thresholds for the Finding Your Way Around metric. Current performance levels already reflect substantial investment in wayfinding infrastructure and passenger information measures. Significant improvements have been delivered over the past year as outlined in later sections. Given the strong performance already achieved, further interventions may be subject to diminishing returns with limited scope for additional investment to generate meaningful increases in passenger satisfaction scores.

3.2.34 As outlined above, the Finding Your Way Around metric is based off subjective passenger survey responses, which can be influenced by factors outside Dublin Airport's control. Passenger familiarity with airports in general, stress levels and individual expectations can all affect perceptions of wayfinding, regardless of signage and navigation systems. As a result, incremental operational improvements may not translate into equivalent changes in survey scores.

3.2.35 The practical infrastructure constraints surrounding Dublin Airport is another element overlooked in these proposed changes. Opportunities to install additional wayfinding infrastructure to help increase metric scores are limited and must be balanced against operational, safety and commercial considerations. Raising the thresholds would therefore risk setting performance expectations that are not achievable under current metric expenditure and

would undermine the principle that regulatory incentives should be both stretching and realistically attainable.

Ease of Movement

3.2.36 The proposed increase to the Ease of Movement metric presents similar challenges to those identified for the Finding Your Way Around metric and Dublin Airport do not support its inclusion in the 2026 Determination. Passenger perceptions of ease of movement can be influenced by factors outside Dublin Airport's control with factors such as infrastructure and capacity constraints playing a significant role. As a result, these limitations may restrict improvements in passenger scores. This means that even with continued investment and improvement, higher ratings may not be achievable.

3.2.37 As stated above, passenger perception on Ease of Movement is heavily influenced by passenger volumes, particularly during peak operating periods when terminal occupancy is naturally higher. Notwithstanding Dublin Airport's successful management of demand and its ability to ensure appropriate operational measures are in place, passenger scores during peak hours will yield lower scores than those of passengers passing through during off-peak hours. As such, the metric is not solely determined by airport performance as the number of passengers passing through Dublin Airport has a significant impact on the scores given. That is airline scheduling decisions influence the deviation in satisfaction.

3.2.38 Performance for this metric is constrained by the physical characteristics of the existing terminal infrastructure. Dublin Airport has limited ability to materially increase space or reconfigure core passenger flow routes without major capital investment. While operational initiatives can optimise the use of available space, they cannot overcome the fundamental limitations of the existing terminal and infrastructure.

3.2.39 This metric is also impacted by several factors outside Dublin Airport's direct control including passenger behaviour, airline boarding processes and regulatory processing requirements. These factors can influence passengers' ability to move through the terminal irrespective of the airport's operational performance. As such, raising the rebate and bonus thresholds would risk establishing targets that are unachievable and inconsistent with the principle of setting realistic and attainable quality of service incentives.

Availability of Trolleys

3.2.40 The trolley operation is a critical passenger service that supports the movement of passengers across Dublin Airport and operates as a complex logistics network rather than a simple asset availability function. As passenger numbers, long-haul traffic and landside activity continue to increase, the complexity of maintaining trolley availability has grown significantly despite core resources remaining largely unchanged. The operation relies on flexible deployment of resources, critical infrastructure, compliance with security screening requirements and efficient movement of assets across an increasingly congested campus. Resources must be continually reassigned throughout the day to ensure trolley availability is maintained where demand is highest. There are factors outside Dublin Airport's control that affect this metric

making it more difficult to reach the current bonus let alone a bonus set 0.5 above this. As outlined previously, a target of 9.5 is operationally unattainable purely based on passenger survey response tendencies and behaviour, irrelevant of actual performance. Passenger behaviour affects this metric greatly as trolleys can be left anywhere across the campus which makes recovery times unpredictable. As well as this, multiple long-haul arrivals within a short timeframe can create sudden demand spikes that cannot always be immediately met despite operational intervention.

3.2.41 The trolley operation supports passenger demand across:

- Arrivals baggage halls
- Departures halls
- Taxi ranks
- Bus and coach facilities
- Set-down areas
- Car parks
- Passenger circulation areas across the airport campus

3.2.42 A trolley movement recording process introduced in 2026 has already captured more than 123,000 trolley injections into replenishment points across the airport. As these figures are recorded manually by operational staff while undertaking normal duties, they represent a minimum level of activity, with actual trolley movements likely to be significantly higher. The operation relies on a small number of critical infrastructure assets to maintain trolley availability. In Terminal 1, trolley supply into the baggage halls depends on three separate injection points. In Terminal 2, trolley availability is heavily reliant on the Paternoster lift system, which acts as the primary mechanism for moving trolleys into the baggage hall. These assets are operationally critical, and their reliability has a direct impact on trolley availability.

3.2.43 Increasing activity across the airport campus has led to greater road congestion, increasing travel times between collection and replenishment points. This results in reduced trolley collection efficiency and trolley recirculation times.

3.2.44 Another operational complexity of the trolley operation is that in 2026, trolley screening within the CPSRA became a certified security function, requiring screening to be carried out by trained and certified personnel in accordance with approved security procedures. This introduced a new regulatory compliance requirement into the trolley operation, adding a manual screening process that did not previously exist. While essential from a security perspective, the additional screening requirement increases the complexity of the operation and can impact the speed at which trolleys are recirculated and returned to passenger-facing areas. As trolley volumes increase, the requirement to screen trolleys before they enter the restricted area introduces an additional operational step that must be completed while continuing to maintain trolley availability throughout the airport. As a result, trolley screening has become a critical dependency within the overall trolley recovery and replenishment process and has reduced some of the operational flexibility that previously existed.

3.2.45 Dublin Airport is being asked to stretch a bonus to an unattainable point of 9.5, with no allocation of resources or cost to aid this increased challenging bonus. This increase does not fully reflect the operational realities of managing a complex airport-wide trolley network. Trolley availability is influenced by a wide range of operational factors including passenger demand patterns, flight schedules, airline activity, long-haul baggage volumes, road congestion, infrastructure reliability and security screening requirements. Unlike many terminal-based services, trolley availability is dependent on the continuous recovery and redistribution of mobile assets across the entire airport campus.

3.2.46 A bonus threshold of 9.5 effectively requires near-perfect passenger satisfaction in an area of the operation that is heavily influenced by factors outside the immediate control of the trolley team. While trolley satisfaction scores remain strong, achieving and sustaining this level of performance would require significantly greater operational intervention and investment for what is likely to be a very limited improvement in the overall passenger experience. The current bonus threshold of 9.0 already represents a very high standard of service and appropriately incentivises operational excellence while recognising the complexity of managing a dynamic airport-wide trolley operation. The proposed increase appears to be driven by historic performance rather than by an assessment of the growing operational complexity of the trolley operation, increasing passenger demand, infrastructure dependencies and the inherent limitations of subjective satisfaction scoring. For these reasons, Dublin Airport believes that a bonus threshold of 9.0 remains the more proportionate, realistic and evidence-based measure of performance for the trolley availability metric.

Satisfaction with free Wi-Fi

3.2.47 Satisfaction with free Wi-Fi is a metric with high outperformance, scoring two bonuses in departures and three in arrivals in 2025. The IAA propose an increase of 0.4 to the bonus threshold of this metric, bringing the proposed bonus score to 9.4. As stated previously, it is difficult to consistently achieve a score higher than an 8.5 based on survey response behaviour, a score of 9.4 is not sustainable to achieve in every quarter of the year.

3.2.48 While Wi-Fi is an important driver of satisfaction among arriving passengers, it is used by only 20% of arriving passengers and has a substantially lower influence within the departures journey where it is used by only 24% of departing passengers. At the same time, satisfaction with the service is already performing at a very high level, leaving limited scope for meaningful further improvement. As performance approaches the upper end of the scale, satisfaction scores become increasingly susceptible to normal variation and fluctuations in the sample composition, meaning that small movements may not necessarily reflect changes in the underlying passenger experience. Increasing the target further would therefore create a significantly more challenging threshold to achieve and sustain, despite the relatively limited remaining improvement opportunity and the service's comparatively narrow reach across the passenger population. The current target already encourages the airport to maintain a high-

quality Wi-Fi service. Increasing the target further may place greater emphasis on achieving marginal score improvements rather than sustaining an already strong level of performance.

IAA's Achievability Adjustment

Information on Ground Transport

3.2.49 Dublin Airport welcomes the decision to reduce the Information on Ground Transport metric. There has been great improvement on this metric in recent years and the margin at which the target was failing has significantly lessened, moving from 7.9 to 8.4. This reflects the investment and work that has been done to meet these targets. The correlation between investment and score improvement has reached a standstill, with the IAA recognising the need to reduce the target.

3.2.50 Dublin Airport wish to reiterate the point made in the Regulatory Proposition; pre-booked taxis should be removed from the information on ground transport metric. They fall entirely outside the airport's operational control and do not align with the intent of the measure. Pre-booked taxis are arranged directly between passengers and private operators with the airport having no influence over dispatching, scheduling, availability, pricing or reliability. It is of no benefit to include pre-booked taxis within this metric as it adds another factor that can distort a passenger's awareness of their journey due to external influence.

Cleanliness of Washrooms

3.2.51 The IAA's decision to maintain the Cleanliness of Washrooms target at 8.5 is problematic and does not adequately reflect the operating environment at Dublin Airport. Examination of objective cleaning data, including detailed cleaning audits carried out by our assurance team, demonstrates consistently high standards of cleanliness across airport washroom facilities. This high standard is not reflected in the passenger satisfaction survey results, which are influenced by individual perceptions, expectations and circumstances. The audits provide an objective assessment of actual cleaning performance.

3.2.52 The disparity between consistently strong audit results and repeated breaches of the passenger satisfaction target suggests that the issue lies not in the standard of cleaning being delivered, but in the suitability of the target itself. While objective measures indicate a high-performing cleaning operation, the associated SQM continues to underperform, demonstrating a disconnect between measured service delivery and passenger perception.

3.2.53 Passenger responses may be influenced by factors beyond the control of the cleaning operation. For example, a passenger's assessment may be shaped by how busy the facility is at a particular point in time, queuing, the actions of other passengers, or overall airport congestion. This metric is particularly relevant from a consumer vulnerability perspective, as the availability and quality of washroom facilities can have a greater impact on passengers with additional needs. As a result, survey responses may not accurately reflect the quality of the cleaning service being provided. Furthermore, the operational realities of a busy airport environment must be considered. Washroom facilities experience exceptionally high footfall, particularly during peak

summer periods, making it challenging to always maintain the same passenger perception of cleanliness despite intensive cleaning activity. The current target does not appear to sufficiently account for these external pressures or the limits of operational intervention.

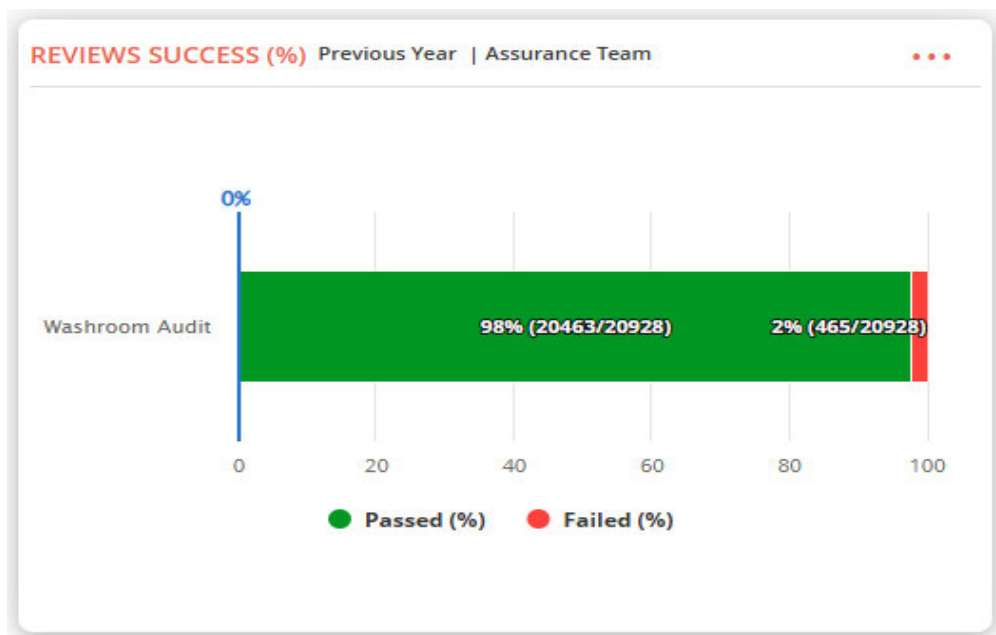
3.2.54 Retaining a target that has proven consistently difficult to achieve despite sustained investment, resource allocation, and objectively strong performance risks creating an incentive framework that penalises performance which is already being delivered at a high standard. Targets should be stretching but achievable, according to the IAA. Where objective evidence demonstrates that a service is performing well yet the associated satisfaction metric continues to miss its target, consideration should be given to whether the target level remains appropriate.

3.2.55 Ultimately, an excessive focus on achieving increasingly ambitious satisfaction scores may detract from a genuinely passenger-centric approach. The objective should be to deliver a high-quality service that meets passenger needs rather than to pursue survey outcomes that may be heavily influenced by factors outside Dublin Airport's control.

3.2.56 Below is a graph showing washroom audit averages across 2025. Nearly 21,000 audits were carried out in washrooms over the year. Audits are conducted seven days a week and across all times of the day to ensure a broad and representative assessment of cleaning standards. The pass rate for these audits is 75%. We can see from the graph that the achieved scores were 98% in 2025. The substantial volume of objective assessments provides a far more comprehensive view of washroom cleanliness than passenger survey responses alone. The scale and frequency of the audit programme demonstrate that washroom facilities are consistently monitored and maintained to a high standard. Given the strength of this objective evidence, continued underperformance against the passenger satisfaction target suggests that the target may not accurately reflect the level of service being delivered and supports Dublin

Airport's request for a reduction in the target to a more realistic and achievable level. An example of the Washroom Audit is shared as an appendix to this chapter.

Table 8. Cleanliness of Washrooms Audit 2025



3.2.57 Dublin Airport is breaching the Cleanliness of Washroom target by a smaller margin than previous years as well as achieving the target in some quarters but there is nothing in place to help us to manage the inevitable worsening of performance as passenger numbers increase. Investment and resources are at capacity, still the score is not being met with enough consistency and reliability. This will only worsen as capacity constraints and congestion builds. It is less about the number of staff, cleaning schedules etc. and more about the disconnect between the objective cleaning results and subjective survey responses. We can see from the cleaning audits that the washrooms are meeting cleanliness requirements, but passengers are not scoring at the target, this is no longer a cleanliness issue, perception is the problem.

3.2.58 Significant investments in washroom cleanliness include:

- Increased focus on cleaning teams using correct equipment, refresher training for all cleaning teams, as well as specialised cleaning teams during peak times.
- Improved schedule so that all washrooms have a sufficient timeline for deep-clean and descaling, introduced trough sinks in T1 to prevent water marks.
- Replaced damaged toilet seats, cleaning team leads given happy or not app for live feedback, improved washroom signage.

3.2.59 Dublin Airport reiterate the ask to reduce the Cleanliness of Washrooms metric target from 8.5 to 8.0 and the bonus from 9.2 to 8.7. These reductions consider the current influences that are impacting passenger perception, bringing the subjective targets more in line with current objective performance.

Table 9: Dublin Airports proposals to existing pax satisfaction metrics

CATEGORY	SUBJECTIVE METRIC	Current Target	Current Bonus	DUB Proposed Target	DUB Proposed Bonus	IAA Proposed Target	IAA Proposed Bonus	DUB Final Proposed Target	Dub Final Proposed Bonus
Passenger Care €0.07 max (penalty / bonus)	Overall satisfaction	8.5	9.3			No Change		No Change	
	Courtesy and helpfulness of airport staff	8.5	9.3			8.6	9.4	No Change	
	Courtesy and helpfulness of security staff	8.5	9.3			8.6	9.4	No Change	
	Overall cleanliness of the airport terminal	8.5	9.2			No Change		No Change	
	Cleanliness of washrooms	8.5	9.2	8	8.7	Proposed Target not granted		8	8.7
	Departure Gates	8	9			No Change		No Change	
	Ease of Movement	8	9			8.1	9.1	No Change	
	Additional Assistance	9	9.5			No Change		No Change	
Passenger Information €0.04 max (penalty / bonus)	Finding your way around	8.5	9			8.7	9.2	No Change	
	Flight information screens	8.5	9			No Change		No Change	
	Info on Ground Transport on Arrival	8.5	9	8.3	8.8	Proposed Target granted		8.3	8.8
Passenger Facilities & Service €0.04 max (penalty / bonus)	Availability of Baggage trolleys	8.5	9			No change	9.5	No change	
	Satisfaction with free Wi-Fi	8.5	9			No change	9.4	No change	
	Facilities for those requiring additional assistance	9	9.5			No Change		No Change	

IAA Draft Determination New Metrics Proposal

3.2.60 Dublin Airport internally monitors metrics that are not reported on, these are examined and analysed to ensure the passenger journey is not lacking in any area, helping us to understand the journey effectively, using them as information points rather than a reporting method. If we note areas requiring improvement in these monitored metrics, action is taken to ensure the passenger experience does not suffer and plans of improvement is introduced.

3.2.61 See the below table for the list of metrics proposed by the IAA in their Draft Determination.

Table 10. IAA Draft Determination New Metrics Proposal

Area	Metric	2025 Average Score	Proposed Rebate Threshold	Proposed Bonus Threshold	Unweighted Base (2025)
Car Parks	Overall satisfaction	8.6	8.3	9.1	659
General	Sense of security	9.1	8.8	9.6	5,816
General	Food outlets	8.1	7.8	8.6	3,691
Dep. Gates	Cleanliness	8.6	8.5	9.1	5,821
Dep. Gates	Comfort of seating/wait for gate area	7.6	7.3	8.1	5,748
Bus transfer from aircraft	Satisfaction with bus journey	9.0	8.7	9.5	114
Lounges	Satisfaction	8.1	7.8	8.6	113

3.2.62 Dublin Airport outlined in its Issues Paper response that there is support for the addition of new metrics to the passenger satisfaction surveys. This was under the pretence that we would be involved in this process with both the IAA and the PAG, where we can share our response on the IAA's proposal as well as our new metrics proposal that is directly linked to the key drivers of passenger satisfaction. We were not involved in choosing these metrics and therefore we cannot stand by several of the new metric proposed.

3.2.63 Dublin Airport believe that the current metrics in place, within the existing SQM regime, address the core touchpoints of a passenger's journey, these being the key drivers of passenger satisfaction as we can see as a result of the previously discussed PRAM analysis.

3.2.64 Dublin Airport believe the metrics proposed by the IAA are unsuitable for reporting on, as well as being attached with a financial penalty. Dublin Airport does not support the inclusion of the proposed new metrics and considers them to be significantly misaligned with the key drivers of passenger satisfaction. They are not within Dublin Airport's direct control and therefore undermine the inherent purpose of the SQM regime. The service quality regime must focus on key areas that drive passenger satisfaction, areas that all passengers experience rather than experiences that are optional that passengers choose to experience for a fee such as lounges, car parks and food outlets.

3.2.65 As outlined below, there are significant costs associated with incorporating these metrics into the SQM regime, particularly where financial incentives or penalties are attached. Their inclusion would necessitate the review and renegotiation of existing contracts with third-party service providers to ensure that responsibility for meeting these targets is appropriately allocated. Where a service is delivered by a third party, the consequences of failing to achieve the required performance standard should rest with the party responsible for delivering that service, rather than Dublin Airport. Failure to align accountability in this way would expose Dublin Airport to financial risk for matters outside its direct control, creating misaligned incentives and reducing the effectiveness of the regime. Ultimately, this could detract from the primary objective of promoting resilience and delivering a better passenger experience.

3.2.66 The IAA's proposed new metrics within the Draft Determination do not appear to adequately account for the additional staffing costs, capital expenditure, and operational resources required to deliver, monitor, and report on these measures. Introducing new metrics is not cost-neutral. Significant investment is required to establish reporting processes, implement operational improvements and achieve the level of performance expected by the IAA. Achieving higher performance scores requires investment. The IAA is seeking improved passenger satisfaction outcomes while stretching the funding available to support them, without providing the resources necessary to deliver the level of improvement expected under the proposed targets.

3.2.67 Before any new metric is introduced, there should be a corresponding cost allowance to support its implementation and delivery. Without appropriate funding, there is a risk that targets are set without consideration of the resources required to achieve them. The costs associated with these new obligations should therefore be clearly identified, assessed, and incorporated into the CIP 2027 framework. Only then can the achievability, value, and proportionality of the proposed metrics be properly evaluated.

3.2.68 Furthermore, where a metric is intended to drive behavioural or operational change, sufficient time and investment must be provided to enable the necessary improvements. It is unreasonable to introduce new performance requirements without simultaneously providing the funding and resources required to deliver them successfully.

Commercial metrics

3.2.69 Dublin Airport considers that any metric linked to a commercial service such as Food Outlets, Lounges or Car Parking products, is unsuitable for inclusion within Dublin Airport's financially incentivised service quality regime. The inclusion of these metrics would result in teams having to focus on areas such as lower pricing, reduced throughput in units, and increased staffing level requirements, ultimately reducing sales and concession income generated from these commercial areas, as a result of chasing high scores within the passenger satisfaction surveys.

3.2.70 Passenger responses to these services are significantly influenced by perceptions of value for money, pricing and factors outside Dublin Airport's direct control. The sample size for these products must also be considered. A metric that only 1% of passengers experience cannot be introduced within a financially adjusted service quality regime. While Dublin Airport recognises the importance of these services within the overall airport experience, financial rewards or penalties should only apply to metrics that are directly controllable by Dublin Airport, statistically robust, and clearly attributable to airport operations. Dublin Airport therefore proposes that the following metrics continue to be monitored internally while alternative measures more closely aligned to core airport services and passenger satisfaction drivers are considered for inclusion within the incentivised reporting regime.

3.2.71 From a cost-benefit perspective, the opportunity to materially improve these metrics may be limited, while the investment required to achieve incremental gains could be substantial. The expenditure necessary to influence performance may exceed the value of the improvement achieved, particularly where outcomes are driven by factors outside Dublin Airport's direct control. This is also in reference to the re-negotiation of contracts with service providers that would be necessary to ensure these metrics are included and that the third party providing the contract receives the implication for failing to meet these targets. Within this, there are existing SLAs and measures such as audits that take place to ensure a high standard of service is offered to passengers. SLA agreements and audit templates are included as an appendix to our response document.

3.2.72 The inclusion of the IAA's chosen new metrics is counterproductive, shifting focus from commercial performance, revenue growth, and operational efficiency towards compliance and risk management. As a result, it risks undermining Dublin Airport's core commercial objectives while adding unnecessary contractual and governance complexity.

Food Outlets

3.2.73 Food outlets at Dublin Airport are operated by third-party concessionaires rather than by the airport itself. While Dublin Airport recognise that the quality of these services forms an important part of the overall passenger experience, accountability for performance is shared, creating uncertainty around who has direct control over passenger outcomes. Passenger perceptions of value for money are also likely to be a significant factor in any satisfaction metric to which there is a fee attached, adding a further element that is not fully within the airport's control. Food outlets satisfaction is also influenced by individual preferences and expectations, making it a less reliable and more difficult to represent the whole passenger base under this metric.

3.2.74 Food Outlets is not a commonly used metric within airport SQM regimes. Many airports participate in the ACI Airport Service Quality (ASQ) programme, which, in terms of shopping and dining, measures several aspects of the experience, separating value for money and overall satisfaction. Using a single metric to assess the entire food outlet experience risks conflating these factors, as scores may be significantly influenced by passengers' perceptions of value for money. Aeroportos de Portugal (ANA) include shopping and dining within their SQM regime,

utilising the separate ACI ASQ metrics demonstrates that a single measure is insufficient to capture the full customer experience. This can be seen in ANA's published performance within the SQM Regime for Q1 of 20264.

3.2.75 Dublin Airport acknowledge that the airport has a responsibility to influence and maintain service standards across the passenger journey. However, the commercial agreements currently in place with F&B operators were not designed with regulatory incentives, bonuses or financial penalties in mind. Consequently, if a passenger satisfaction metric for Food Outlets were introduced with associated financial penalties, Dublin Airport would bear the full regulatory risk, while the businesses directly providing the service would have limited or no exposure to the consequences of underperformance. Introducing airport-level SQMs will create duplication and conflicting performance priorities, commercial metrics already have targets through the Commercial Revenue building block. There is also a risk that attaching regulatory incentives to Food Outlet satisfaction could create unintended behaviours. Commercial operators may prioritise satisfaction scores over commercial performance. For example, by reducing prices or limiting throughput in order to improve customer ratings. While these actions may improve survey results, they could reduce revenues and concession fees paid to Dublin Airport without delivering a proportionate benefit to passengers.

3.2.76 Following significant investment and the transformation of the airport's F&B portfolio over the past 5 years, satisfaction levels are already benefiting from substantial improvements in passenger offering and experience. Given the operational and capacity constraints of the airport, further material gains will be increasingly difficult and costly to achieve. Based on the F&B benchmarking undertaken at 44.5 million passengers, the F&B estate is projected to face a significant airside space deficit, increasing pressure on customer experience. With limited additional airside space planned beyond approved CIP projects, the scope for delivering further material improvements is limited.

3.2.77 Importantly, purchasing food and beverages is an optional part of the passenger journey. Unlike core airport services such as Security, Wayfinding or Terminal facilities, passengers choose whether or not to engage with F&B outlets. For this reason, F&B satisfaction measures should be treated differently from metrics that assess essential elements of the airport experience. The primary objective of the SQM regime should be to focus on those areas that are most critical to, and most influential on, overall passenger satisfaction, particularly where the airport has direct operational control and accountability for outcomes.

3.2.78 F&B services are divided into a number of packages, with each package comprising multiple F&B units. Contracts with the service providers operating these units are in place until at least January 2032, with some extending to July 2036. All packages are subject to a Service Level Agreement (SLA). Under Dublin Airport's SLA with F&B service providers, performance across all units within the licensed premises is measured against four key areas:

- Food & Beverage Range and Price

⁴ [ANA Passenger Satisfaction Metrics Q1 2026](#)

- Operational Delivery
- Service Delivery and Performance (including one third-party mystery shop per unit per month and a minimum of two daa internal F&B audits per unit per month)
- Compliance and Reporting

3.2.79 Each unit is scored individually monthly across these four areas. The average score for all units is then used to determine overall SLA performance for that month. This performance framework provides a robust and comprehensive assessment of operational and service standards, with all units required to meet the prescribed performance thresholds each month. The combination of regular audits, independent mystery shopping, and ongoing monitoring helps maintain consistently high standards across the airport, ensuring passengers receive a high-quality food and beverage experience. The SLA agreement is shared as an appendix to this document along with daa audit sample questions for F&B and daa Mystery shopping questions.

Lounges

3.2.80 Lounges are an optional premium product used by approximately 1% of departing passengers, meaning they are not a core part of the airport journey for the vast majority of passengers and do not represent the experience of the wider travelling public. Lounge services are commercial products and Dublin Airport is already incentivised to maintain high standards through customer retention, revenue generation and commercial performance. Introducing a regulatory incentive could create competing objectives and drive decisions that increase operating costs or negatively impact commercial returns.

3.2.81 The current lounge satisfaction metric is based on an annual sample of just 113 passengers, representing a very small proportion of users. With a sample size this limited, a small number of negative responses can have a disproportionate impact on the overall score, creating a significant margin of error and reducing confidence that the results accurately reflect overall passenger satisfaction. Temporary lounge closures from Q4 2025 through to the end of Q1 2026 further reduced the robustness of the dataset and highlight the metric's sensitivity to isolated events.

3.2.82 Lounge satisfaction is influenced by passenger expectations, perceived value for money, travel purpose, passenger mix, occupancy levels, queueing, food preferences and airline status benefits. This level of subjectivity makes it unsuitable for direct financial incentives or penalties. The lounge operation is delivered by a third-party service provider under a commercial agreement. While Dublin Airport maintains oversight through contractual arrangements and service standards, the day-to-day customer experience is not under direct operational control. A financially incentivised SQM would likely require contract renegotiation, additional performance management provisions, enhanced reporting requirements and revised risk-sharing arrangements, creating additional costs without guaranteeing improved passenger satisfaction outcomes.

3.2.83 Not all lounges are operated by Dublin Airport, passengers may not distinguish between Dublin Airport-operated lounges and airline-operated lounges, such as the Aer Lingus Lounges,

when responding to surveys. This creates a risk that Dublin Airport could be assessed on experiences delivered by providers over whom it has no operational control, undermining the reliability of the metric. Historic performance data may also be less relevant due to the significant lounge upgrades delivered in recent months and changes to access arrangements. Furthermore, Dublin Airport's 2025 PRAM analysis conducted by Red C ranked lounge satisfaction 68th out of 68 departure metrics influencing overall passenger satisfaction, indicating that lounges are among the least important drivers of the passenger experience. The inclusion of the metric Lounge Satisfaction as a financially incentivised SQM would be disproportionate given the limited passenger reach, small sample, size, third-party operational delivery and highly subjective nature of the measure. Dublin Airport's position is that the metric should be removed from the SQM framework. A sample audit for lounges is attached as an appendix to this document.

Car Parks

3.2.84 Passenger perceptions of airport parking can be influenced by factors that are not always within Dublin Airport's control. For example, the current passenger satisfaction survey does not only capture feedback from customers who have used Dublin Airport-operated car parks. It captures all passengers, therefore there is a risk that passengers may use off-site or third-party parking providers but still associate any negative experience with Dublin Airport, resulting in lower satisfaction scores for a service that was not provided by the airport. Similar issues arise where airline-related problems affect the overall passenger journey and influence ratings of the airport experience. Parking is also a product that can attract inherently lower satisfaction levels due to its cost, as well as the dynamic pricing strategy utilised. It is often seen as a “grudge purchase”, so customers may score lower simply because they do not want to pay for parking, even where the product and service have worked well. In that context, consistently achieving high scores is likely to be unrealistic. Factors such as value for money, shuttle bus services, transfer times and waiting times can significantly influence passenger perceptions, often regardless of the quality of the parking service itself. As a result, satisfaction scores may reflect attitudes towards paying for parking rather than the standard of service provided.

3.2.85 Furthermore, parking is an optional part of the passenger journey. Passengers can choose alternative modes of transport and are not required to use airport parking facilities. While parking services should continue to be delivered to a high standard and supported through ongoing improvement initiatives, they are not a core component of the journey experienced by all passengers. The SQM regime must focus on the areas that have the greatest influence on overall passenger satisfaction and where Dublin Airport has direct control over outcomes. While all services should strive for excellence, only those that are directly managed by the airport and are fundamental to the passenger experience should be linked to financial incentives or penalties. Car parking only represents circa. 11% of the total passenger's modal mix for airport access. Including it as a metric in the SQM regime could therefore give too much weight to the experience of a relatively small group of passengers.

3.2.86 Dublin Airport does not support the inclusion of Car Parking in the SQM reporting regime as it is not an adequate representation of the passenger experience and is not relevant to the

service provided by Dublin Airport, therefore undermining the centric focus of continuous improvement and resilience within the SQM Regime.

Sense of security

- 3.2.87 Dublin Airport is not solely responsible for the provision of security at Dublin Airport. The overall security environment is delivered through a collaborative, multi-agency approach involving a number of State bodies, including An Garda Síochána, the Defence Forces, the Irish Naturalisation and Immigration Service/Garda National Immigration Bureau, Revenue, Customs, and other agencies. Consequently, a passenger's perception of security may be influenced by the visibility, actions, or interactions of any one of these entities rather than by Dublin Airport's security operations alone.
- 3.2.88 The security framework at Irish airports is governed by a comprehensive legislative and regulatory regime. The State is required to comply with the common rules in the field of civil aviation security as set out in Regulation (EC) No. 300/2008 and Commission Implementing Regulation (EU) 2015/1998, as amended, which establish detailed measures for the implementation of common basic aviation security standards. In accordance with these requirements, the State maintains a National Civil Aviation Security Programme (NCASP) a restricted document, which sets out how airports within the State comply with both European and national security obligations.
- 3.2.89 Importantly, many of the security measures deployed at the airport are deliberately not visible to the travelling public and are therefore unlikely to inform passenger perceptions. The airport operates a layered security model that includes, among other things, dedicated aviation security patrols, behavioural detection officers, targeted security operations, alarm monitoring systems, intelligence-led activity, and an extensive CCTV network across the airport campus and surrounding areas. Given that passengers will have limited visibility of many of these controls, their perception of security may not be an accurate reflection of the actual security posture or effectiveness of the measures in place.
- 3.2.90 External factors can influence a passenger's sense of security while travelling. International events, such as terrorist attacks, geopolitical instability, or widely publicised security incidents at other airports, may affect passenger perceptions regardless of the actual security environment at Dublin Airport. These factors are largely outside the Airport's control and can influence survey responses independently of operational performance.
- 3.2.91 Furthermore, the metric measures a passenger's perception of security rather than security performance itself. While Dublin Airport operates in accordance with all applicable security legislation, regulatory requirements and mandated procedures, individual perceptions of security can vary considerably depending on factors such as previous travel experiences, familiarity with air travel, personal confidence, and wider societal events. As a result, 'Sense of security' is inherently subjective and does not provide a direct or consistent measure of airport performance. Changes in the metric may reflect shifts in passenger sentiment and external influences as much as any change in the effectiveness of security operations at Dublin Airport.

Bus Transfer to Aircraft

3.2.92 Dublin Airport does not support the introduction of a SQM for airside bussing services at Dublin Airport. While Dublin Airport currently procures a number of airside bussing services to support specific airport operational requirements, other bussing demands arise from the use of remote stands where bussing services are provided through arrangements between airlines and approved ground handling providers. Dublin Airport currently holds a contract with Sky Handling Partner (SHP) for the provision of airport-managed bussing services including:

- Scheduled shuttle services between Terminal 2 bussing gates and satellite stands at the South Gates, including inbound passenger transport back to Terminal 2; and
- Outbound and inbound bussing for US Pre-Clearance operations between Pier 4 and remote stands on Apron 5H.

3.2.93 These services were introduced to support specific infrastructure and operational requirements at the airport. Under these arrangements, Dublin Airport contracts directly with SHP, sets the service requirements and oversees contract performance. The costs are recovered through existing airport charging arrangements.

3.2.94 The distinction is consistent with previous guidance provided by the IAA. In both 2022 and 2026, Dublin Airport engaged with the Aviation Regulation Team regarding the status of airside bussing services, including whether they could be designated as centralised infrastructure or procured centrally by Dublin Airport on behalf of airlines. The IAA advised that buses are vehicles used in the provision of ground handling services and are not considered centralised infrastructure. The IAA further advised that where Dublin Airport contracts directly with airlines for the provision of bussing services falling within the scope of Schedule I, 7.1 or Schedule II, 3.4 of S.I. No. 505 of 1998, Dublin Airport would require a Ground handling Approval. The same consideration may also arise where Dublin Airport acts as a contracting authority and subcontracts the service to a third-party provider.

3.2.95 Dublin Airport does not intend to seek a Ground handling Approval for the provision of bussing services to airlines. Accordingly, future growth in bussing demand resulting from increased use of remote stands is expected to be met through arrangements directly between airlines and approved ground handling providers, consistent with the current regulatory framework.

3.2.96 Given the IAA's established position that airside bussing is a ground handling activity rather than airport infrastructure, Dublin Airport does not believe that an airport-level SQM for airside bussing would be appropriate. While airport-managed bussing services will continue to operate for specific operational purposes, future expansion of bussing activity is expected to occur primarily through ground handling arrangements between airlines and approved service providers.

3.2.97 An airport-wide SQM would therefore measure a service that is delivered through a mix of airport-managed and ground handler-managed arrangements and which over time, is likely to become increasingly associated with ground handling activity rather than the provision of airport infrastructure in the limited services that are managed under the Dublin Airport contract. In Dublin Airport's view, this would make it difficult for the measure to provide a clear and consistent assessment of airport service quality.

3.2.98 For these reasons, Dublin Airport does not consider that an airside bussing SQM would provide an appropriate or proportionate measure of airport service quality and does not support its inclusion within the regulatory framework.

Dep. Gates Cleanliness

3.2.99 The cleanliness of departure gates is already captured within the broader terminal cleanliness metric. As such, it is more appropriate and effective to rely on the overall terminal cleanliness measure rather than assessing a single area in isolation. Departure gates represent a unique stage of the passenger journey where factors such as queuing, congestion, lingering passengers, and flight delays can influence passenger perceptions and satisfaction levels. The same argument for the general Cleanliness of washroom metric applies here; a target of 8.5 is recommended for this metric to be in line with the existing washroom cleanliness metric. This is too high a target and the same barriers to achieving this apply as outlined previously.

3.2.100 We have been unable to meet this target consistently in the past as it is harder to manage in comparison to the other cleanliness metrics due to factors such as flight delays and congestion. As a result, cleanliness assessments at departure gates may be disproportionately affected by circumstances outside the airport operator's control, leading to results that do not accurately reflect the standard of cleaning services provided. The overall terminal cleanliness metric offers a more balanced and representative measure of performance across the passenger journey. Therefore, the departure gate cleanliness metric should be removed and not included in the final service quality regime.

Departure gate comfort of seating/ wait for gate area

3.2.101 Clarification is required regarding this proposed metric. The IAA has combined two distinct measures under the departure gates category, namely Comfort of Seating at Departure Gates and Comfort of Wait for Gate Area but has applied thresholds based on the historical scores for Comfort of Seating at Departure Gates. These measures assess different aspects of the passenger experience and should not be treated interchangeably. The Comfort of Wait for Gate Area metric relates to the seating and waiting areas around the Flight Information Display Screens (FIDS), where passengers typically wait before proceeding to their assigned gate. In contrast, Comfort of Seating at Departure Gates relates specifically to seating provided within the gate areas themselves. As these metrics measure different environments and passenger behaviours, the basis for the proposed target should be clarified.

3.2.102 The 2025 average score referenced by the IAA appears to be based on the Comfort of Seating at Departure Gates metric and therefore, it is assumed that this is the measure to which

the proposed target relates. Achieving a higher target for this metric requires significant capital investment. Dublin Airport currently provides seating in line with IATA guidance, with seating available for approximately 60-70% of a flight, within departure gate areas. However, there is no industry-standard requirement in place in Dublin Airport relating to the comfort of seating itself. It must be considered that passenger assessments of seating comfort are inherently subjective and can be influenced by factors other than seat design, including seat availability, gate congestion, dwell times, and individual passenger expectations. This metric does not provide a fully objective or consistent measure of performance, as perceptions of comfort can vary considerably between passengers. As a result, satisfaction scores may vary significantly despite no underlying change in the quality or condition of the seating provided. This makes the target a poor basis for financial incentives or penalties. There is also limited evidence that this measure is a material driver of overall passenger satisfaction or that its inclusion would deliver meaningful passenger benefit. Historical performance demonstrates that the existing Departure Gates metric consistently achieves its target, typically scoring between 8.2 and 8.4 over recent years. This suggests that passengers already perceive the departure gate environment positively and does not indicate a service quality issue requiring regulatory intervention.

3.2.103 There has been significant work undertaken by Dublin Airport's Operations Improvement team to enhance seating provision at departure gates, investing approximately €1.9 million in new airside seating across Terminal 1, PBZ and the post-CBP area. This seating improvement project focused on both increasing seating capacity and improving passenger comfort. This investment has resulted in a substantial increase in the number of seats available to passengers and reflects Dublin Airport's ongoing commitment to improve the passenger experience. The seating installed is supplied by a recognised international airport seating provider and is widely deployed in airports globally. These assets have an expected lifespan of 10 – 15 years and represent a long-term investment in passenger comfort and service quality. The revised seating figures are set out below and should be considered when assessing the appropriateness of future performance targets, as they demonstrate that material improvements have already been delivered in this area.

Table 11. Departure Gate Seating T1 Project

Location	Old seat count	New seat count	% Increase
Pier 1	1,181	1,853	57%
Pier 2	148	404 incl. 20 new PRM seats	173%
Pier 3	544	588	8%
Bussing Gates	137	224	64%

3.2.104 Dublin Airport is proactively managing and investing in this area, with substantial improvements recently delivered to enhance the passenger experience as mentioned above. The introduction of a financially backed SQM creates a risk that future capital expenditure is driven by the pursuit of marginal movements in subjective survey scores rather than genuine passenger

need. No evidence has been presented demonstrating a clear relationship between additional expenditure on seating and corresponding improvements in passenger satisfaction scores. As a result, the proposed metric could incentivise further investment without demonstrating that such expenditure would deliver proportionate passenger benefit. Dublin Airport should not be subjected to an SQM that promotes the premature replacement of assets that remain fit for purpose and within their expected economic life due to a subjective perception of comfort.

Conclusion on IAA New Metrics Proposal

3.2.105 We do not believe that the metrics proposed by the IAA meet the principle of the SQM regime. Metrics should focus on activities that are substantially within the airport operator's control and for which the airport can reasonably be held accountable. There are many organisations involved in passenger touchpoints that can affect passenger perception and their overall journey. The IAA do not consider this in their new metrics proposal, yet in response to Dublin Airport's proposal for the inclusion of joint metrics to add responsibility to airlines where applicable, they state in paragraph 12.14 of the Draft Determination "We think there would be significant complexity associated with such joint metrics, in particular regarding whose performance is being incentivised, and in what way that performance is attributed to different stakeholders". In the new metrics proposal where a measure does involve some degree of shared responsibility, the IAA do not indicate how that should be handled. It is not set out when third-party involvement should result in the exclusion of a measure, an adjustment to its threshold, monitoring without financial consequence, or reliance on an ex-post exemption. This therefore displays the one-sidedness of the IAA's Draft Determination proposal.

3.2.106 While the IAA proposed metrics undoubtedly form part of some but not all passenger journeys, their inclusion within an incentivised service quality regime risks holding Dublin Airport responsible for outcomes that are significantly influenced by third parties, commercial considerations and external operational factors. Dublin Airport supports additional metrics to the passenger satisfaction survey metrics, showing the commitment to the passenger and our ongoing efforts to consistently aim to better the airport experience.

Dublin Airport Counteroffer to IAA's New Metrics

3.2.107 As outlined in its Issues Paper Response, Dublin Airport are open to additional passenger satisfaction metrics to be added to the SQM regime. Therefore, Dublin Airport has outlined a counteroffer to the IAA proposed metrics that is more relevant to the passenger and the key drivers of satisfaction. These are the metrics that would have been consulted on with the PAG had the opportunity been presented. The PAG's engagement and consultation on these would have been most welcome, the aim being to focus on areas that are key drivers of passenger satisfaction, areas that all passengers experience and that are compulsory in the airport journey.

The Importance of Wayfinding in the Passenger Journey

3.2.108 Wayfinding is a key driver of passenger satisfaction. Dublin Airport's PRAM analysis demonstrates that a number of wayfinding-related measures rank amongst the most important factors influencing the passenger experience. This is consistent with wider industry research.

IATA5 has identified wayfinding as a primary passenger need and emphasises the importance of clear, consistent and intuitive navigation throughout the airport journey. Dublin Airport also engaged with the WayFinding Centre through the Accessibility Forum in December 2025, where the importance of accessible and intuitive wayfinding was highlighted, particularly for passengers with reduced mobility, passengers with hidden disabilities, older passengers and families travelling with young children.

3.2.109 Industry research shows that passengers place a high value on clear, consistent information that helps them understand where they are, where they need to go and what to expect next. Effective signage, intuitive layouts, and clear visual cues help passengers locate gates, washrooms, and other key facilities more efficiently, reducing stress and contributing to higher levels of satisfaction. The decluttering of signage is just as effective as the implementation of new signage, aiding the delivery of a frictionless journey to passengers.

3.2.110 Dublin Airport has conducted its own research in Wayfinding; across recent employee and passenger research, signage and wayfinding were repeatedly highlighted as areas that influence the passenger journey. Staff highlighted that some passengers needed assistance to find departure gates, terminals, washrooms, and transfer routes, while participants described challenges such as difficult-to-spot signage, information overload and a lack of reassurance along longer walking routes. A recurring insight was that passenger stress is often driven less by the distance being travelled and more by uncertainty about whether they are heading in the right direction.

3.2.111 This is particularly important for facilities such as washrooms where passengers may require access urgently and without advance planning. Passenger research found that experiences are strongest when facilities are easy to locate and integrated naturally into the passenger journey, while gaps in visibility or reassurance can create anxiety, particularly for families and passengers with reduced mobility.

3.2.112 The research outlined above has informed and guided the ease of movement and wayfinding projects delivered by Dublin Airport over the past year. These projects include:

Landside:

- Review of all landside wayfinding across Dublin Airport, establishing a consistent methodology across both terminals, including directional terminology, iconography, destination descriptions, and zone locator references.
- Delivered a significant wayfinding refresh programme, replacing over 50 signs and introducing new backlit wayfinding signage in key passenger areas to improve visibility, navigation, and passenger confidence.

⁵ [Wayfinding takes a new direction | Airlines](#)

- Established an ongoing wayfinding review process, using passenger feedback, operational observations, and journey analysis to continuously refine and improve the effectiveness of the signage network.

Terminals:

Gate 335 Shuttle Bus Gate Enhancement

- Installation of a dedicated Gate 335 portal to create a clear visual destination for passengers accessing the shuttle bus service. The portal significantly enhances wayfinding by increasing the visibility of the gate from a distance, clearly identifying the boarding point, and reinforcing passenger direction throughout the journey. The addition provides a more intuitive and seamless experience, helping passengers navigate independently and reducing uncertainty when locating the gate.

Pier 1 Arrivals Estimated Walking Time

- Installation of walking-time indicators to help passengers understand journey times immigration, reducing uncertainty and improving confidence when navigating the terminal.

T1X & Pier 3 Decision Point

- The installation of wooden design planters and illuminated lightboxes has created stronger visual identity and clearer decision points at the entrances to Pier 1 and Pier 2. These features act as recognisable landmarks within the terminal, supporting intuitive navigation and helping passengers identify key routes more easily.

Smoking Area

- Clear directional signage has been installed from Terminal 2 to the smoking area, including estimated walking times. This enables passengers to locate the facility more easily, supports independent navigation, and improves overall ease of movement through the terminal.

Hydration Station

- Hydration stations have been enhanced with illuminated lighting in key locations to increase visibility and awareness. Where stations are situated off the main passenger walkway, directional passenger signage has been installed to improve wayfinding and ensure facilities can be located quickly and independently by passengers.

3.2.113 Taken together, the evidence⁶ shows that signage is more than a navigation tool. It is a confidence building tool that helps passengers move through the airport independently, reduces stress and supports a smoother overall journey⁷. Satisfaction with signage therefore serves as an important indicator of how effectively the airport enables passengers to navigate with confidence and it is prioritised by Dublin Airport through continuous planning and investment.

⁶ [The Evolution of Wayfinding Within Airports](#)

⁷ [Spatial design for wayfinding in airports](#)

Table 12: Dublin Airport's counteroffer to IAA's new metrics

CATEGORY	Area	Proposed Subjective Passenger Survey Metrics	Dublin Airport Proposed Rebate	Dublin Airport Proposed Bonus
Dublin Airport proposed	Washrooms	Signage to Washrooms in Departures & Arrivals	8.5	9.0
Dublin Airport proposed	Departure Gates	Signs to Departure Gates	8.5	9.0

Signage to washrooms in arrivals and departures

3.2.114 The Signage to Washrooms metric is directly linked to the passenger journey and is relevant to all passengers travelling through Dublin Airport. Access to washroom facilities is a basic passenger need, and clear, effective signage is critical to ensuring passengers can locate these facilities quickly and easily. While wayfinding is captured through broader metrics, signage to washrooms warrants separate consideration due to its importance, frequency of use and direct impact on passenger comfort, accessibility and overall satisfaction. This is particularly relevant for families travelling with young children, older passengers, passengers with reduced mobility and those with hidden disabilities. The metric would provide a targeted measure of the effectiveness of the airport's wayfinding infrastructure and support continuous improvement in an area that is highly visible to passengers across both arrivals and departures.

3.2.115 The inclusion of this metric would require an appropriate allowance for investment in physical and digital signage, including real-time information on temporary washroom closures, cleaning activities and alternative facilities. It would also support the prioritisation of essential wayfinding information within the terminal environment and encourage the reduction of visual clutter created by non-essential signage and advertising. Commercial and promotional signage can compete with critical wayfinding information for passenger attention, reducing the effectiveness of directional signage and making navigation more challenging. Inclusion of this metric would incentivise a signage strategy that prioritises passenger needs and improves the overall wayfinding experience.

3.2.116 Performance against this metric is largely within Dublin Airport's control through signage design, placement, visibility, maintenance and operational management. As such, it represents a measurable, actionable and passenger-focused indicator that can be directly influenced by airport investment and operational decisions. The metric aligns well with the objectives of the SQM regime by encouraging continuous improvement in a core aspect of the passenger experience and providing a clear assessment of the effectiveness of airport wayfinding infrastructure.

3.2.117 Dublin Airport proposes a target threshold of 8.5 for this metric and a bonus threshold of 9.0. We believe these thresholds are appropriately calibrated to reflect both the current operating environment and the anticipated challenges over the coming years. Forecast passenger growth, as projected by both the IAA and Dublin Airport, is expected to increase pressure on airport capacity and congestion levels, which may adversely impact performance against this metric. Wayfinding and ease of movement metrics are significantly influenced by passenger congestion. Increased passenger volumes and capacity constraints can reduce passenger perceptions of ease of movement and navigation, placing downward pressure on performance against these metrics.

Signage to departure gates

3.2.118 Signage to departure gates also relates to the metric Finding Your Way Around, but it warrants individual focus due to its importance to passengers and the critical role it plays in the airport journey. Finding their departure gate is often one of the most stressful aspects of travel, particularly when passengers are conscious of boarding times and navigating an unfamiliar environment. This is especially relevant for vulnerable passengers, including those with reduced mobility, language or communication barriers, and those who may be less comfortable using digital tools.

3.2.119 Industry research consistently shows that passengers place a high value on clear wayfinding and their ability to locate their gate quickly and confidently. Effective gate signage reduces stress and uncertainty, supports accessibility and inclusivity, and contributes significantly to overall passenger satisfaction. Given its importance to the passenger experience, the ability to find a departure gate efficiently should be recognised as a distinct area of focus within the service quality regime.

3.2.120 Unlike several other metrics proposed by the IAA, performance against this metric is largely within Dublin Airport's direct control. The Airport is responsible for the design, placement, maintenance and ongoing review of wayfinding infrastructure, including signage, digital information displays and passenger information systems. This creates a clear and direct link between Dublin Airports actions and the resulting passenger outcomes making the metric a useful addition to the existing menu of passenger satisfaction metrics at Dublin Airport.

3.2.121 The inclusion of this metric would require the appropriate resourcing to allow Dublin Airport to invest in additional signage and wayfinding resources. Given the existing infrastructure constraints as highlighted earlier in the service quality appendix, and the consideration that this additional signage would be competing for terminal space with commercial, advertisement, washrooms and other forms of signage, the need for strategic investment and funding in this area is clear. This metric targets an area of particular importance in the passenger journey as it directly assesses the passenger's ability to navigate efficiently through the terminal and locate their departure gate with confidence.

3.2.122 Effective wayfinding is a fundamental component of a seamless airport journey and plays a significant role in reducing passenger stress, minimising confusion and supporting the efficient movement of passengers through the terminal environment. As demonstrated by Dublin Airports analysis and research, wayfinding-related measures are among the most important drivers of overall passenger satisfaction and therefore warrant an appropriate level of focus under the regulatory framework.

3.2.123 Dublin Airport proposes a target threshold of 8.5 for this metric and a bonus threshold of 9.0. We believe these thresholds are appropriately calibrated to reflect both the current operating environment and the anticipated challenges over the coming years. Forecast passenger growth, as projected by both the IAA and Dublin Airport, is expected to increase pressure on airport capacity and congestion levels, which may adversely impact performance against this metric.

3.2.124 Passenger satisfaction with signage to departure gates is influenced by a range of factors beyond the quality of the signage itself. The complexity of passenger journeys, variations in passenger familiarity with the airport, and increasing terminal footfall can all affect how easily passengers are able to locate their departure gate. As passenger numbers continue to grow, these factors may place additional pressure on performance against this metric, notwithstanding continued investment in signage and wayfinding infrastructure.

Conclusion

3.2.125 Dublin Airport believes the counteroffer outlined above better demonstrates a commitment to improving the service quality regime in a way that directly responds to passenger needs and expectations. It reflects Dublin Airport's understanding of passengers, represents the needs of our full passenger base, and ensures that our time and resources are focused on the areas that matter most to them. Prioritising improvements in metrics that are not central to the passenger experience risks diverting attention from the aspects of service that have the greatest impact on passenger satisfaction, forfeiting resources and improvements on areas that matter most.

3.2.126 Dublin Airport's approach is guided by passenger research and responses, data analysis, and ongoing stakeholder engagement. This evidence-based process gives us confidence that the metrics we have selected align with passenger priorities and support meaningful improvements in their overall airport experience. By focusing on what matters most to passengers, Wayfinding being a vital area, we can ensure they remain at the forefront of both our operations and our service quality regime.

4. Other Issues

4.1 Data Sources

4.1.1 Dublin Airport agrees with IAA continuing to use CSM surveys for subjective survey-based scores as well as maintaining objective targets in how they are currently recorded. Dublin

Airport agrees with the other points raised by the IAA regarding data sources and understands that if any changes are required, a report outlining these changes must be submitted to the IAA.

4.2 Nature of Incentives

4.2.1 In its Issues paper, the IAA state the case for bonuses in regard to objective measures is weaker given that performance should already be set at an optimal level. This is stated again in the IAA's Draft Determination however this is still opposed by Dublin Airport. The IAA argue there would be no benefit in incentivising improvement however Dublin Airport disagrees with this statement. As previously stated by Dublin Airport in its Issues Paper Response, similar airports such as Heathrow employ its MTI scheme in which it is incentivised to improve and reduce queue times encouraging outperformance as bonuses are available for both passenger and Staff Search targets. The introduction of bonuses is a great way to continuously incentivise improvement and outperformance, allowing for a better quality of service for passengers and overall, more efficient airport operations.

4.3 Exemptions and Force Majeure

4.3.1 Dublin Airport in both our Issues Papers Response and Regulatory Proposition requested that the IAA re-evaluate and update the criteria for force majeure and SQM exemptions. Force majeure exemptions regarding security queue time breaches in particular was highlighted as breaches that occur as a result of extenuating circumstances outside Dublin Airports control should not result in a financial penalty.

4.3.2 In its Draft Determination the IAA acknowledged Dublin Airports request stating it would consider any evidence of extenuating circumstances that Dublin Airport provided however, also outlined its belief that the current approach remains appropriate, and that Dublin Airport provide little in the way of specifics as to why the scope of exemptions should be broadened. The IAA highlight that 2 important factors which must be taken into consideration regarding exemptions is to which the root cause relates to something external to Dublin Airport and the extent to which circumstances were reasonably foreseeable.

4.3.3 In response to the IAA's stance regarding force majeure and exemptions Dublin Airport believe that in the past on occasions the IAA have been selective in granting exemptions despite the existence of extenuating circumstances being demonstrated. An example of this is the granting of an exemption regarding a security queue time breach which occurred due to a security threat which forced several lanes to be closed however, the rejection of the force majeure clause regarding events such as the occurrence of a power outage and the UEFA Final in 2024.

4.3.4 In assessing instances where a breach has occurred Dublin Airport recognise that all relevant factors should be taken into consideration. As highlighted by the IAA 2 key factors that are of particular importance in determining if an exemption is warranted is, the extent to which the root cause relates to something external to Dublin Airport, and the extent which the circumstances leading to the breach were reasonably foreseeable. The IAA rightfully

acknowledged this regarding the security threat which led to a queue time breach however, this wasn't the case for the other breaches referenced. In each case when such breaches occurred Dublin Airport provided detailed evidence to the IAA outlining the root causes leading to the breaches in both cases such as disruptive passengers which has the ability to compromise the safety of others and the breach occurring outside normal operating hours regarding the UEFA Final and the unplanned occurrence of a power outage in the Airport. In both cases appeals were denied however, both events met the 2 key factors listed for the granting of an exemption with the existence of extenuating circumstances and the occurrence of unforeseeable events demonstrated among several other extenuating factors.

- 4.3.5 In the coming regulatory period Dublin Airport request the scope to be broadened to help avoid financial penalties such as these as applying penalties in situations in which Dublin Airport cannot reasonably influence outcomes can create regulatory distortion and is inconsistent with the principles of incentive-based regulation the IAA seeks to apply. Safety remains the primary goal of security screening and as such Dublin Airport should not be penalised for events which occur that negatively influence queue times which have the potential to compromise passenger safety if not addressed.

5. Service Quality Assessment: Supporting Information

5.1 Supporting Analysis to the Service Quality Assessment

5.1.1 This section includes the following documents:

- The Punish Rewards Analysis Matrix (PRAM) for both Departures and Arrivals
- The Cleanliness Audit of 2025
- daa Sample F&B SLA
- daa Audit Sample Questions for F&B
- daa Mystery Shopping Questions
- Lounges: Commercial Audit

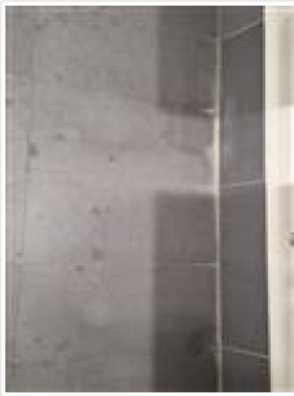
Punish Reward Analysis Matrix (PRAM)

Departures

	Rank
Information on flight delays	1
Overall satisfaction with departure gate experience	2
Overall satisfaction with check-in areaexperience today	3
Comfort of wait for Gate Area (October 2015 to date)	4
Waiting time at US Pre Clearance	5
Cleanliness of departure gates	6
Overall US Security experience	7
Finding your way around	8
Assistance from airport staff	9
Ease of movement through the airport	10
Availability of baggage trolleys	11
Flight information screens in general	12
Ease of locating facilities in departure area	13
Signs to the departure gates	14
Overall satisfaction with toilets/washrooms	15
Courtesy and helpfulness of airport staff	16
Bars (April 2015 to date)	17
Courtesy and helpfulness of check-in staff	18
Satisfaction with Fast Track VFM	19
Placement of toilets/washrooms throughout the airport (January 2008 to date)	20
Overall satisfaction with security search / passenger screening today	21
Shopping experience at Dublin Airport Duty Free (Added April 2025 to date)	22
Amount of space provided at the security search area (January 2008 to date)	23
Overall Cleanliness of the Airport Terminal	24
Cleanliness of toilets/washrooms	25
Length of time it took to get to toilets/washrooms (January 2008 to date)	26
Availability of sockets to charge electronic devices (May 2023 to date)	27
Facilities for passengers with reduced mobility	28
Food Outlets (April 2015 to date)	29
Waiting time at check-in	30
Layout of the security search area (January 2008 to date)	31
Provision of supplies in the toilets/washrooms	32
Ease of finding check-in desk for your flight	33
Eating/drinking facilities	34
Dublin Airport Website (Added April 2025 to date)	35
Ease of finding toilets/washrooms	36
Overall Walking distances to departure gate	37
Overall appearance of car park	38
Overall satisfaction with car park	39
Ease of finding a space	40
Standard of decoration (April 2015 to date)	41
Shuttle bus from the car parks	42
Courtesy & helpfulness of security staff	43
Ease of finding a seat	44
Ease of finding departure gate	45
Comfort of Seating (April 2015 to date)	46
Public transport	47
Sense of security	48
Sense of safety for my health (January 2023 to date)	49
Ease of finding bag & tag/ABD	50
Waiting time at security	51
Ease of locating	52
Satisfaction with Fast Track	53
Walking distance from car park to terminal (April 2015 to date)	54
Length of time queuing at bag & tag/ABD	55
Ease of using automated check-in for your flight	56
Value for money	57
Queuing time to use toilet/washroom (January 2008 to date)	58
Satisfaction with Dublin Airport's free Wi-Fi	59
Length of time queuing at machines	60
Overall satisfaction with check-in system experience for this flight	61
Courtesy/helpfulness of car park staff (Qtr 3 2008 to date)	62
Ease of finding car park	63
Security of car park	64
Number of SSK machines available	65
Overall Value for Money	66
Dublin Airport App (Added April 2025 to date)	67
Overall satisfaction with Dublin Airport Lounge(s)	68

Arrivals

	Rank
Overall satisfaction with your baggage delivery today at Dublin Airport	1
Ease of movement through the Airport	2
Sense of safety for my health	3
Provision of Wi-Fi	4
Speed of your baggage delivery from the time of arriving at the baggage carousel	5
Ease of finding a trolley	6
Efficiency of queue movement (at electronic immigration / passport control)	7
Overall cleanliness of the Airport Terminal	8
Ease of using the machine scanner (at immigration / passport control)	9
Effectiveness of machine scanner (at immigration / passport control)	10
Satisfaction with experience of bus journey from plane to the Terminal building	11
Overall satisfaction with passport control experience	12
Overall satisfaction with toilets/washrooms	13
Courtesy of passport control staff	14
Length of time you had to queue (at electronic immigration/ passport control)	15
Cleanliness of toilets/washrooms	16
Sufficient number of booths open to facilitate passengers (at immigration / passport control person)	17
Location of toilets/washrooms	18
Sufficient number of machine scanners open to facilitate passengers (at electronic immigration/ passport control)	19
Ease of finding the baggage carousel for your flight	20
Length of time you had to queue (at immigration / passport control person)	21
Efficiency of queue movement to the immigration booths (at immigration / passport control person)	22
Efficiency of passport control staff (at immigration / passport control person)	23
Overall satisfaction with passport control experience	24
Provision of supplies in the toilets/washrooms	25
Ease of finding toilets/washrooms	26
Walking distance from the plane to the baggage reclaim area	27
Signposting for toilets/washrooms	28
Satisfaction with assistance received	29

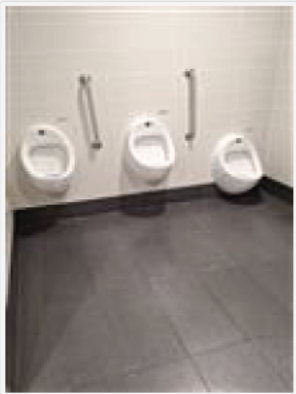
Unique Identifier : DAA447208		Review : Washroom Audit		Reviewer : Niall McGavin		Reviewed Between : 20.08.2026 10:10 To 20.08.2026 10:11		Received On : 20.08.2026 10:12		Received From : samsung SM- A546B	
QUESTION			SCORE	OBSERVATION(S)	ASSIGNED TO	TASK STATUS	PICTURE INFO				
Dublin Airport >> T1 >> Mitie >> South Gates >> West Male - PBZ-TB-04											
Are the toilet pans/bowls/urinals clean?											
Dirt			P								
Dust			P								
Stains			P								
Limescale			P								
Are all the floors clean?											
Dirt/Debris/Dust			P								
Stains			F	No additional comment							
Excessively wet			P								
Are all sinks/taps clean?											
Dirt/Debris			P								
Stains			F	No additional comment							
Stickers			P								
Limescale			P								
Are all surfaces/mirrors clean?											
Dirt/Debris/Dust			P								
Stains			P								
Stickers/unofficial signs/graffiti			P								
Are all sanitary bins/bins/nappy bins clean?											
Overflowing			P								
Stains/Dirt on outside			P								

QUESTION	SCORE	OBSERVATION(S)	ASSIGNED TO	TASK STATUS	PICTURE INFO		
Dust	P						
Stickers/Graffiti	P						
Is there sufficient consumables?							
Soap	P						
Toilet Roll	P						
Are all walls/partitions/doors/vents clean?							
Dirt/Dust/Stains	F	No additional comment					
Stickers/graffiti/unofficial signs	P						
Are all dispensers/fixtures clean?							
Dirt/Debris	P						
Stains	P						
Stickers/unofficial signs/graffiti	P						
Is it free of bad odours							
Is it free of bad odours	P						
Legends							
Pass	P	Fail	F	Asset Issue	AI	N/A	NA

Additional image 1



Additional image 2



Reviewer Signature

NG

By Niall McGavin

[REDACTED]

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Daa Audit Sample Questions F&B

Entity Type	Category	Question
Sample Questions - vary based on Category of F&B unit being audited	Overall Customer Experience	Are all bins clean and usable / Was there a staff member on the floor clearing tables?
		Are all floor areas clean?
		Are all food accessories(cutlery, crockery, cruets, baskets, menus, takeaway packaging, trays etc.) clean, labelled and in good condition?
		Are all staff in correct uniform and wearing correct AIC badge?
		Are all table and chairs clean & in good condition?
		Are the counters, serving area and till spaces clean and well presented?
		Is the unit free from clutter?
		Was the service friendly & welcoming?
		Was there music playing in the unit? / Were sports being shown on the TVs? (if applicable)
		Was there a staff member on the floor offering second serves with a hand held tablet at busy times?
	Queuing and staffing	Was the queue for the bar moving at an appropriate rate? (if not, please indicate how many customers were in the queue)
		Was there a visible passenger flow system in place?
		Was there sufficient levels of staff on duty including senior leadership to clear tables?
	Food & Drink offering	Was alcohol pricing available?
		Are menus and food items clearly displayed with any food offers easy to understand?
		Were hot drinks, soft drinks and alcohol being served in the correct cup / glass?
		Was there any allergen advice displayed for each menu item?
		Was there visibility of current seasonal menu items?
		Were the shelves or offering well stocked, clearly labelled and prices marked?
		Were the menus on the tables, clean and in good condition?
	Customer Experience	Was the overall appearance and presentation of the unit at a high standard to deliver an excellent passenger experience?

daa Mystery Shopping Questions - varies bases on Category of unit		Answer Scores
		(Not displayed to shoppers)
Shopper Profile	Big Header	
Gender:	Radio Button (Mult Choice)	Female(0)
		Male(0)
Age Group:	Radio Button (Mult Choice)	18-24(0)
		25-34(0)
		35-44(0)
		45-54(0)
		55-64(0)
		65+(0)
Purpose of travel:	Radio Button (Mult Choice)	Holiday(0)
		Business(0)
		Family(0)
		Other(0)
		Not flying - landside(0)
How regularly do you fly?	Radio Button (Mult Choice)	A few times a month(0)
		Once a month(0)
		Occasionally(0)
		Not often (i.e. once or twice a
General Information	Big Header	
Please state the area assessed:	Multi-Checkbox (Mult	Landside(0)
		Airside(0)
Date of visit	Date	
Time of visit	Time of Day	
Day of visit:	Multi-Checkbox (Mult	Monday(0)
		Tuesday(0)
		Wednesday(0)
		Thursday(0)
		Friday(0)
		Saturday(0)
		Sunday(0)
What was the level of business in the unit at the time of your visit?	Multi-Checkbox (Mult	Very Busy (15+ customers)(0)
		Busy (10-15 customers)(0)
		Steady (5-10 customers)(0)
		Quiet (5 or less customers)(0)
Please upload a copy of your receipt:	Picture Upload	
Please upload pictures of your order:	Picture Upload	
Please upload any pictures from your assessment:	Picture Upload	
Please upload any pictures from your assessment:	Picture Upload	
Please upload any pictures from your assessment:	Picture Upload	
Please upload any pictures from your assessment:	Picture Upload	
Please name/identify ALL staff you dealt with throughout your visit and explain where each interaction took place.	Text	
If no name visible, you must give a detailed description:		
First Impressions	Big Header	
How would you rate your first impression of the premises? (cleanliness)	Scored Number	Score between 1 and 10
10 = Wow/exceptional, 9/8 = Very Good, 7 = Good, 6/5 = Acceptable, 4-0 - Poor/Unacceptable		
Please comment on the overall condition of the premises. (cleanliness)	Text	
Was signage and menu information clear, accurate and easy to read?	Yes - No	Yes(5)
		No(0)
Were food/drink displays and grab-and-go areas well stocked, where applicable?	Yes - No - N/A	Yes(5)
		No(0)

		N/A(0)
Were gluten-free and NGCI products available and visible at the time of your visit? (Non-Gluten Containing Ingredients)	Yes - No - N/A	Yes(0)
		No(0)
		N/A(0)
Please comment on the availability, visibility and any staff knowledge observed in relation to gluten-free or NGCI products.	Text	
On a scale of 1-10, how would you rate the cleanliness of this unit?	Scored Number	Score between 1 and 10
10 = Wow/exceptional, 9/8 = Very Good, 7 = Good, 6/5 = Acceptable, 4-0 - Poor/Unacceptable		
Please give reason for your score above. (Hygiene levels, condition of displays, seating area, floors, counters, etc.)	Text	
Were tables cleared in an acceptable timeframe and was active cleaning ongoing, where required and feasible?	Yes - No - N/A	Yes(10)
		No(0)
		N/A(0)
How long did you remain seated in the seating area?	Time Length	
Please upload before-and-after photos of the seating area showing the tables that remained uncleared/cleared throughout your visit.	Picture Upload	
Did all staff observed conduct themselves in a professional manner?	Yes - No - N/A	Yes(10)
		No(0)
		N/A(0)
Queueing & Ordering Process	Big Header	
How many customers were ahead of you in the queue?	Number	
How many staff were visible in this area?	Number	
Was it clear how and where to order in this café?	Radio Button (Mult Choice)	Definitely(10)
		Somewhat(5)
<i>i.e. order at the counter, use a self-service kiosk, collect from a hatch, or follow another clearly signposted process.</i>		Not at All(0)
Was a self-service kiosk available in this unit?	Yes - No	Yes(0)
		No(0)
If yes, was the self-service kiosk operational at the time of your	Yes - No - N/A	Yes(0)
		No(0)
		N/A(0)
Did customers appear to be using the self-service kiosk during your	Yes - No - N/A	Yes(0)
		No(0)
		N/A(0)
Did you have to queue to place your order?	Yes - No	Yes(0)
		No(0)
How long were you waiting in the queue/or to be served?	Time Length	
Was the queueing area and passenger flow easy to navigate?	Yes - No - N/A	Yes(5)
		No(0)
		N/A(0)
Considering the level of activity, were you happy with the queueing	Yes - No	Yes(10)
		No(0)
Did the staff member smile and greet you?	Yes - No - N/A	Yes(10)
		No(0)
		N/A(0)
Did you have staff's full, undivided attention while ordering?	Yes - No - N/A	Yes(10)
		No(0)
		N/A(0)

If you answered "No" to the above question, please explain your answer.	Text	
Did staff demonstrate product knowledge or willingness to check with colleagues?	Yes - No - N/A	Yes(10)
		No(0)
		N/A(0)
If you answered "No" to the above question, please explain your answer.	Text	
Food/Drink	Big Header	
On a scale of 1-10, how would you rate the variety of food/drink options available for this café? Please consider this location only.	Scored Number	Score between 1 and 10
10 = Excellent selection, 9-8 = Very good selection but could be improved, 7 = Good selection with room for improvement, 6-5 = average selection with much room for improvement, 4-0 = Poor/unacceptable selection		
Please give reason for your above score. (Range of food/beverages available)	Text	
What did you order?	Text	
Did the product you received match what was advertised (e.g. imagery, description, ingredients)?	Yes - No - N/A	Yes(5)
		No(0)
		N/A(0)
Please comment on any differences between the product advertised and the product received.	Text	
On a scale of 1 to 10, how would you rate the taste, temperature and quality of your order?	Scored Number	Score between 0 and 10
10 = Excellent, 9-8 Very Good but could be improved, 6-5 (Average, not great), 4-0 (Poor, unacceptable)		
How would you rate your order in terms of the following:	Multi-Checkbox (Mult Choice)	Taste(3)
		Temperature(3)
<i>Tick the box if you were satisfied with each area.</i>		Quality(3)
Please give reason for your above score. (Food quality, presentation and taste.)	Text	
Were porcelain cups used for sit-in customers?	Yes - No - N/A	Yes(5)
		No(0)
		N/A(0)
Please add any relevant comments regarding cup usage.	Text	
Till Transaction	Big Header	
Were you served by the same staff member at the till, as you took your order?	Radio Button (Mult Choice)	Same staff member(0)
		Different staff member(0)
		Self-Service(0)
Did the staff member greet you?	Yes - No - N/A	Yes(10)
		No(0)
		N/A(0)
Did you have the staff member's full attention for the duration of the transaction?	Yes - No - N/A	Yes(10)
		No(0)
		N/A(0)
Were you charged the correct amount for your purchase?	Yes - No	Yes(10)
		No(0)
Were you issued with a receipt for your purchase?	Yes - No	Yes(0)
		No(0)
Were you thanked/bid farewell or told to enjoy your meal by the staff member?	Yes - No	Yes(10)
		No(0)

Overall Impressions	Big Header	
On a scale of 0-10, how would you rate the level of service you received?	Scored Number	Score between 0 and 10
10 = Wow (service that was above and beyond what I was expecting), 9-8 Very Good (Friendly/Helpful/Knowledgeable), 7-6 Average (it was acceptable), 5-0 (Poor, unacceptable)		
Please justify your rating on the level of service received, explaining the reason why you deducted any marks.	Text	
On a scale of 1-10, how would you rate value for money in this store?	Scored Number	Score between 0 and 10
Please justify your rating of the value for money, explaining the reason why you deducted any marks.	Text	
On a scale of 1-10, how likely would be to return to/recommend this outlet to others?	Scored Number	Score between 0 and 10
Please explain why you would/would not return to/recommend this outlet to others.	Text	
Please detail your visit from start to finish including any improvements you would suggest, and good practices you observed/encountered.	Narrative	

Lounge Audit Commercial

Setup

Review Name	Scoring Formula	Success Percentage
Lounge Audit - Commercial	Yes/Good (Pass), Average (Fail), No/Poor (Fail), N/A	0.00-89.99, 90.00-100.00

Questions

Entity Type	Question	Description	Weight
Service Standards	Is the reception area manned, efficient and tidy? (Yes/No) (4)		4.00
Service Standards	Is the servery/barista area clean and well presented? (Yes/Average/No) (5)		5.00
Service Standards	Are all floor areas clean? (Yes/Average/No) (5)	Service Standards	5.00
Service Standards	Are all tables being cleared and cleaned in a timely manner (Yes/Average/No) (5)		5.00
Service Standards	Is the servery/barista fully stocked with crockery, cutlery and glassware? (Yes/Average/No) (4)		4.00
Service Standards	Are all food and beverages well presented with clear and updated labelling across all food items? (Yes/Average/No) (4)		4.00
Service Standards	Are all food and beverages on display and stocked to adequate levels? (Yes/Average/No) (4)		4.00
Service Standards	Is the allergy booklet up-to-date and on display? (Yes/No) (5)		5.00
Service Standards	Are passenger queuing times at reception, barista, bar no longer than 5 minutes? (Yes/No) (4)		4.00
Service Standards	Is the full agreed product range available? (Yes/Average/No) (5)		5.00
Staffing Levels & Management Cover, Staffing levels & Management Cover East	Is there a full complement of staff on duty? (Yes/No) (5)		5.00
Staffing Levels & Management Cover	Is there a manager/supervisor present on the floor overseeing the operation? (Yes/No) (5)		5.00
Staff Appearance & Manner	Are all staff in correct uniform and name badges clearly visible? (Yes/No) (3)		3.00
Staff Appearance & Manner	Were staff engaging with customers on the floor, at barista, upon entry and exit in a polite and friendly manner? (Yes/No) (2)		2.00
Waste Management	Are the proper waste management procedures being followed and signage updated? (Yes/No) (5)		5.00
Cleaning	Are all showers fully stocked with towels, shampoos and shower gels? (Yes/No) (1)		1.00
Cleaning	Are all 3rd party cleaning areas being monitored and any issues being escalated to the responsible parties? (Yes/No) (2)		2.00
Cleaning	Is the operator reacting to any additional housekeeping issues to maintain smooth running of the operation? (Yes/No) (2)		2.00
Occupancy, Occupancy East	How busy was the lounge at time of audit? (Yes/No) (1)		1.00
Service Standards East	Are all tables being cleared and cleaned in a timely manner? (Yes/Average/No) (4)		4.00
Service Standards East	Are all food/beverages on display and stocked to adequate levels? (Yes/Average/No) (3)		3.00
Staffing levels & Management Cover East	Is there a manager present on the floor overseeing the operation? (Yes/No) (5)		5.00
Staff appearance & Manner East	Were staff engaging with customers on the floor, at Barista, upon exit and exit in a polite and friendly manner? (Yes/No) (4)		4.00
Cleaning East	Are showers fully stocked with towels, shampoos and shower gels? (Yes/No) (2)		2.00
Cleaning East	Are all handle areas and glass free from grime and hand marks? (Yes/No) (1)		1.00
Cleaning East	Are all ledges, hinges and kickplates dust free? (Yes/No) (1)		1.00
Cleaning East	Are all floors and walls free from debris, dust and marks? (Yes/No) (1)		1.00
Cleaning East	Are all sinks(exclusive of issue), associated surfaces, cabinet doors/drawers and water boilers etc. clean and free from debris? (Yes/No) (1)		1.00
Cleaning East	Are all doors, walls, panels free from dust, grime, marks and graffiti? (Yes/No) (1)		1.00
Cleaning East	Are all seat bowls and internal/external surfaces clean and free from grime, dust, marks/stains? (Yes/No) (1)		1.00
Cleaning East	Are all dispensers replenished, clean, free from dust, grime and marks? (Yes/No) (1)		1.00
Cleaning East	Are all mirrors clean, free from dust, splashes and streaks? (Yes/No) (1)		1.00
Cleaning East	Are all areas of the floor clean? (Yes/Average/No) (2)		2.00
Cleaning East	Are all tables/chairs including bases clean? (Yes/Average/No) (2)		2.00
Cleaning East	Are all skirting, conduiting, radiators, edges and rails clean and dust free? (Yes/No) (1)		1.00
Cleaning East	Are all pictures, door frames, window ledges etc clean and dust free? (Yes/No) (1)		1.00
Cleaning East	Are all bins and areas behind bins emptied and clean? (Yes/No) (2)		2.00
Cleaning East	Are all cleaning records complete? (Yes/No) (2)		2.00
Service Standards East	Is the reception area manned, efficient and tidy?. (Yes/No) (3)		3.00
Service Standards East	Is the servery/barista area clean and well presented?. (Yes/Average/No) (4)		4.00
Service Standards East	Are all floor areas clean? (Yes/Average/No) (4)	Service Standards East	4.00
Service Standards East	Is the servery/barista fully stocked with crockery, cutlery and glassware?. (Yes/Average/No) (3)		3.00
Service Standards East	Is the full agreed product range available?. (Yes/Average/No) (3)		3.00
Service Standards East	Is the allergy booklet up-to-date and on display?. (Yes/No) (3)		3.00
Waste Management East	Are the proper waste management procedures being followed and signage updated?. (Yes/No) (2)		2.00
Service Standards East	Are all food and beverages well presented with clear and updated labelling across all food items? (Yes/Average/No) (3)		3.00

Additional Fields

Additional Question Name	Question Type	Question Data Value	Mandatory	Display Level	Display For
How busy was the lounge at the time of audit?	RadioButton List	0-20%, 21-40%, 41-60%, 61	No	Review End Leve	
Any other comments?	Text Area			Review End Leve	
How busy was the lounge at time of audit?	Drop Down	0%-20%, 21%-40%, 41%-60	No	Question Level	How busy was the lounge at time of audit?