



Dublin Chamber Submission to the IAA Draft Determination 2027 to 2031

Airport Charges at Dublin Airport

September 2026

Introduction

Dublin Chamber welcomes the opportunity to respond to the Irish Aviation Authority's Draft Determination on airport charges at Dublin Airport for 2027 to 2031. Dublin Chamber supports a regulatory settlement that enables the investment needed to accommodate future demand, maintain reliable services and strengthen Ireland's international connectivity.

Dublin Chamber represents businesses across the Greater Dublin Area, from start-ups and SMEs to large multinational companies. Access to international markets is essential to these businesses. Decisions on airport charges therefore have implications beyond the aviation sector, affecting trade, tourism and Ireland's attractiveness for investment.

Dublin Chamber is concerned that the proposed reductions in airport charges and expenditure allowances could constrain the investment required to support the passenger growth envisaged in the Draft Determination. The Final Determination should ensure that traffic forecasts, operating resources and capital allowances are consistent with one another. Competitive charges must be supported by adequate capacity and high-quality services.

Supporting connectivity and competitiveness

Dublin Airport is a strategic national asset. As an island economy, Ireland depends on air connectivity to reach customers, attract visitors and maintain international business relationships. The availability and reliability of direct routes matter to both indigenous firms seeking to grow overseas and international companies considering investment here.

Dublin Chamber has consistently supported additional capacity at Dublin Airport and the removal of the passenger cap. That position reflects the importance of allowing infrastructure to develop in line with economic and population growth. The regulatory framework must also support the investment necessary to make additional capacity available in practice.

Constraints at Dublin Airport affect businesses and communities throughout Ireland. Delayed investment risks limiting route development and weakening the quality of the service available to passengers and airlines. The IAA should take account of these wider economic consequences when assessing the proposed settlement.

Matching growth with operating resources

Dublin Chamber believes that passenger growth assumptions must be matched by the resources required to serve those passengers. Higher traffic forecasts increase expected revenue, but they also increase the demands placed on airport facilities and staff. The IAA should test whether its proposed allowances support both the growth it anticipates and the standard of service it expects.

Higher passenger volumes also place additional demands on security, cleaning, maintenance and operational support. Dublin Chamber supports efficiency improvements, but expenditure

allowances must deliver the service airport. Resilience should form part of that assessment.

reflect the resources needed to standards expected of the during periods of disruption

Passengers and businesses need an airport that operates reliably throughout the year. The IAA should ensure that service quality requirements are matched by appropriate operating allowances. Reductions that undermine maintenance or frontline delivery could impose wider costs through delays and disruption.

Enabling infrastructure delivery

Dublin Chamber supports investment in additional airport capacity, the renewal of ageing assets and improvements in passenger facilities. Approval of investment in principle must be supported by a regulatory settlement that allows necessary works to be financed and delivered. The IAA should reassess any capital allowances that could delay projects essential to meeting future demand or maintaining reliable operations.

Ireland cannot afford to wait until infrastructure reaches capacity before investing in its replacement or expansion. Airport projects require years of planning and delivery. Businesses need confidence that capacity will be available when they seek to expand, enter new markets or bring additional visitors to Ireland. Deferring necessary works creates uncertainty and risks higher costs later.

Capital allowances should support efficient, deliverable projects, with clear accountability for costs and completion. Where further evidence is required before a project can be approved, the Final Determination should provide a clear route and timetable for reconsideration. Necessary investment should not be delayed by avoidable regulatory uncertainty.

Competitive charges and financial sustainability

The cost of doing business is a central concern for Dublin Chamber. Competitive airport charges matter to airlines, business travellers and the tourism sector. However, businesses also bear the costs of unreliable services and constrained connectivity. The Final Determination should assess affordability alongside the investment required to provide a dependable service.

The proposed reduction in charges should be assessed alongside the scale of the capital programme and the cost of maintaining service quality. A short-term reduction would offer limited benefit if it contributed to capacity constraints or higher costs later. The relevant test is whether the overall settlement supports efficient investment and a dependable service for current and future users.

Access to long-term finance is essential to delivering major airport projects. The IAA should assess the combined effect of its revenue assumptions, expenditure allowances and permitted returns on the airport's ability to raise finance on reasonable terms. It should also test whether essential investment remains financeable if passenger volumes or commercial revenues fall below forecast. Investment certainty must be supported by realistic assumptions.

Sustainable growth and airport access

Airport growth must be accompanied by improvements in environmental performance and surface access. The regulatory framework should support efficient investment in energy use,

lower-emission airport infrastructure needed requirements.

operations and the to meet environmental

Dublin Chamber also continues to support the delivery of MetroLink. A high-capacity rail connection to Dublin Airport, alongside improved bus and coach services, is essential to providing better access for passengers and employees. Airport development and public transport investment must be planned together, although responsibility for delivering the wider transport network extends beyond this determination.

Conclusion

Dublin Chamber calls on the IAA to ensure that the Final Determination supports the investment and operational capacity required to sustain Ireland's international connectivity. In particular, Dublin Chamber recommends that the IAA:

- Align passenger and commercial revenue forecasts with realistic operating and investment requirements.
- Provide operating allowances that support efficient staffing, maintenance, security and service quality.
- Enable timely delivery of necessary capital projects, with clear review arrangements where further evidence is required.
- Set charges and returns that protect airport users while allowing efficient investment to be financed.

Dublin Airport must be able to accommodate future demand safely and sustainably. A balanced regulatory settlement will protect passengers, support airlines and provide the investment certainty on which businesses across Ireland depend.