

Emirates Airline submission

Consultation on the Draft Determination on the Maximum Levels of Airport Charges at Dublin Airport 2027-2031

Introduction

Emirates welcomes the opportunity to comment on the Irish Aviation Authority's Draft Determination on the Maximum Levels of Airport Charges at Dublin Airport for the period 2027-2031.

Emirates has served Ireland for almost 15 years and plays an important role in connecting Ireland to markets across Asia, Africa, Australasia and the Middle East through Dubai. The airline supports Ireland's tourism, trade and investment objectives by providing global connectivity to over 140 destinations through its network. As one of the world's most valuable airline brands, Emirates is committed to delivering a premium, customer-centric travel experience from Dublin Airport. Through its four-class offering of First, Business, Premium Economy and Economy, Emirates provides Irish consumers with a level of choice, connectivity and service differentiation that is unique in the Irish market.

As a significant long-haul operator at Dublin Airport, Emirates has a strong interest in ensuring that the regulatory framework promotes efficient investment, sufficient infrastructure capacity, high-quality passenger services and long-term connectivity growth. For full-service network carriers operating widebody aircraft, the quality of both airport infrastructure and the passenger experience on the ground are integral components of the end-to-end product delivered to customers.

Overall, Emirates supports the IAA's objective of providing a stable and transparent regulatory framework. However, we believe the final determination should place greater emphasis on the requirements of long-haul and widebody operations and the expectations associated with full-service international carriers, and ensure that investment priorities address the capacity constraints already experienced by airport users today.

1. Passenger forecasting and connectivity growth

Emirates welcomes the IAA's detailed forecasting work and the use of GDP and GNI-based econometric modelling to estimate future passenger demand. The analysis demonstrates a strong relationship between Ireland's economic growth and demand for air travel.

However, we encourage the IAA to recognise that historic economic relationships alone may not fully capture future demand opportunities arising from growth in long-haul connectivity, expansion of global tourism flows, development of transfer traffic, Ireland's increasing integration into global trade and investment networks, and emerging tourism markets outside Europe and North America.

In particular, long-haul connectivity often stimulates demand rather than merely responding to it. Future traffic growth will therefore depend not only on macroeconomic performance but also on the availability of airport infrastructure capable of supporting network expansion.

We encourage the IAA to continue using demand-led forecasts that reflect the potential for connectivity growth and avoid creating a framework whereby infrastructure investment becomes constrained by existing capacity limitations.

2. Recognition of the value of long-haul traffic

Throughout the consultation documents, passenger volumes understandably feature as a primary planning metric. However, Emirates believes that passenger numbers alone do not fully capture the value generated by different categories of traffic. Long-haul passengers typically generate higher tourism spend¹, stay longer in destination markets², support trade and inward investment,³ spend typically more time within terminal facilities and generate significant commercial revenues through retail and food and beverage purchases.

The commercial revenue modelling demonstrates a strong relationship between passenger volumes and non-aeronautical revenues. Nevertheless, future reviews would benefit from greater consideration of passenger composition and value, rather than passenger volumes alone. This would better reflect the contribution of long-haul services to Dublin Airport, Ireland's economy and airport commercial performance. While low-cost and short-haul operators understandably account for a significant share of passenger volumes at Dublin Airport, regulatory and investment decisions should also recognise the strategic economic value generated by full-service long-haul connectivity and premium international traffic.

3. Operational capacity constraints remain a key concern

From Emirates' operational perspective, the most pressing challenge facing Dublin Airport is not the level of airport charges, but the adequacy of infrastructure capacity.

Current operational constraints include:

- Limited widebody stand availability during peak periods;
- Shortages of check-in capacity in Terminal 2;
- Constraints within baggage handling systems;
- Capacity planning that is often primarily driven by narrowbody short-haul operations.

Emirates notes that Dublin Airport continues to experience robust growth while infrastructure remains under significant pressure. This reinforces the importance of ensuring that investment programmes are focused on operational bottlenecks and future capacity needs.

¹ <https://transition-pathways.europa.eu/tourism/news/europe-sees-strong-rebound-long-haul-travel-interest-amid-evolving-global-trends>

² https://etc-corporate.org/uploads/2023/03/ETC-Tourism-Economics_Brochure-on-long-haul-travel_fin_March-2023.pdf

³ <https://www.oxfordeconomics.com/resource/good-things-come-to-those-who-wait-the-renewed-importance-of-long-haul-travel/>

The final determination should therefore place particular emphasis on investments that directly improve operational resilience and passenger processing capability.

4. Capital Investment Programme

Emirates supports the overall direction of the proposed Capital Investment Programme and recognises the significant level of investment proposed across airport development, security and passenger infrastructure.

From an airline-user perspective, investments that address capacity constraints should remain a core priority. The proposed Pier 1 East development is particularly important in this regard. The project would provide additional aircraft contact stands, passenger gates and terminal capacity for long-haul operations. It therefore has the potential to address some of the airport's most significant capacity constraints.

Emirates supports investments that increase aircraft stand capacity, improve passenger processing facilities, enhance baggage handling systems, improve operational resilience during peak periods, and support future long-haul growth.

5. Greater consideration of widebody operations

A notable observation from Emirates' review of the Draft Determination is the limited discussion of the infrastructure requirements of widebody and long-haul operations.

This is important because long-haul airlines face different infrastructure requirements compared to short-haul operators, including contact stand availability, widebody parking positions, higher baggage processing demands, larger passenger processing requirements, and increased check-in and boarding infrastructure needs.

Emirates would welcome further consideration of how the proposed investment programme supports future growth in long-haul connectivity and accommodates ICAO Code E and Code F aircraft operations.

Future infrastructure planning should explicitly assess widebody stand requirements, contact gate availability, terminal processing capacity for large aircraft departures, and baggage infrastructure requirements associated with long-haul traffic.

6. Opex efficiency and service quality

Emirates supports efficient airport operations and recognises the work carried out by the IAA and its advisers in assessing efficient operating expenditure allowances. However, efficiency initiatives should not compromise passenger service standards, airport resilience, operational performance, or capacity to accommodate future growth.

The operating expenditure forecasts envisage continued growth while maintaining downward pressure on costs per passenger. While this objective is understandable, maintaining quality of service will be particularly important given the forecast growth in passenger numbers and the constraints already evident across airport infrastructure.

7. Delivery and accountability

Emirates supports the IAA's focus on delivery mechanisms, regulatory scrutiny and project oversight. The value of the Capital Investment Programme will depend on successful delivery rather than planned expenditure alone.

We therefore encourage the IAA to maintain strong delivery incentives, to continue monitoring project milestones, to ensure transparency regarding project progress, and to minimise the risk of delays to capacity-enhancing investments.

This is particularly important given the airport's forecast growth trajectory and the need to avoid infrastructure constraints becoming a limiting factor on connectivity and quality of service.

Conclusion

Emirates supports the IAA's objective of establishing a stable regulatory framework for Dublin Airport for the 2027-2031 period.

While we broadly support the proposed approach, we believe the final determination should place greater emphasis on:

- The infrastructure requirements of long-haul and widebody operators;
- Capacity-enhancing investments that address existing operational bottlenecks;
- Delivery of major infrastructure projects, particularly airport development schemes;
- Recognition of the broader economic value generated by long-haul connectivity;
- Ensuring that operational efficiency objectives do not come at the expense of service quality or resilience.

Dublin Airport plays a critical role in supporting Ireland's global connectivity. The final determination should therefore ensure that future investment supports not only passenger growth, but also the long-haul network development and infrastructure capability required to sustain Ireland's position as an internationally connected economy.