

Submission to the Irish Aviation Authority

Response to the Draft Determination on the Maximum Level of Airport Charges at Dublin Airport, 2027–2031

17 September 2026

1. Introduction

Fingal Chamber is the independent, member-led voice of business in Fingal, Ireland's fastest-growing county and the home of Dublin Airport. Our members range from SMEs and entrepreneurs to multinationals, and include daa, the operator of Dublin Airport, businesses operating at and around the airport campus, and airline members such as Aer Lingus and Emirates.

That breadth shapes this submission. The Chamber's interest is not in the commercial position of any single party. It is in a regulatory settlement that works for the whole airport ecosystem: the operator that must build and run the infrastructure, the airlines that connect Fingal businesses to their markets, and the passengers and freight customers who ultimately carry the cost of getting the balance wrong in either direction.

We welcome the opportunity to respond to the Draft Determination published on 14 July 2026, and we set out below the outcomes we ask the Authority to secure in its Final Determination.

2. Dublin Airport and the Fingal economy

Dublin Airport is the single most important economic asset in our county. It facilitates 116,100 jobs across the Republic of Ireland and contributes €9.6 billion in gross value added, equivalent to 2.3% of the national economy, with 19,900 people directly employed at the airport (InterVISTAS, 2023). Fingal is the largest single beneficiary: 27% of the employment and 29% of the GVA generated by the airport sits in this county (InterVISTAS, 2023).

The Fingal Development Plan 2023-2029 recognises the airport as a key economic engine and a strategic business location of national significance (Fingal County Council, 2023). The airport handled a record 36.4 million passengers in 2025, its busiest year to date (daa, 2026). With legislation enacted to remove the passenger cap and the IAA forecasting growth from 39.4 million passengers in 2027 to 44.5 million by 2031 (IAA, 2026a), the decisions taken in this Determination will shape employment, investment and enterprise development in Fingal for a decade.

3. The Chamber's position

The Chamber does not take a view on the precise price cap figure. Setting that number is the Authority's statutory function, and we recognise that both lower charges and higher charges carry real benefits and real costs for our members. Instead, we ask the IAA to test its Final Determination against four outcomes:

- **Critical infrastructure is delivered.** The capital investment needed for capacity, resilience and sustainability at the airport is fully funded and built on time.
- **Growth assumptions and operational funding match.** Whatever passenger forecast the Authority adopts, the operating allowances must be sufficient to serve that number of passengers safely and to a high standard.
- **Dublin stays cost-competitive for airlines and passengers.** Charges remain competitive among European capital city airports, supporting route development, connectivity and affordable access.
- **Funding follows delivery.** Passengers and airlines should pay for infrastructure that is built, with clear accountability where it is not.

4. Fund the investment programme, and hold it to delivery

The Draft Determination approves the majority of daa's Capital Investment Programme in principle, which we welcome, and we support the ambition of that programme. However, the Authority approves €4.5 billion of capital investment overall while providing for between €2.4 billion and €3.8 billion of it to take place within the period, with the balance falling after 2031, and €1.5 billion of the new allowances is available only through pricing triggers attached to 23 major projects (IAA, 2026a; IAA, 2026c). That structure leaves a substantial share of the proposed programme, and its timing, without funding certainty.

For Fingal businesses, the concern here is practical rather than financial: uncertainty over whether capacity, asset renewal and resilience projects will proceed, and when. An airport expected to handle eight million more passengers a year by 2031 than it does today cannot do so on current infrastructure, and delays to enabling investment are ultimately paid for by the region in congestion, disruption and lost opportunity.

At the same time, we acknowledge the Authority's finding that capital delivery in the current period has fallen significantly short of what pricing assumed, with projects delayed by delivery and planning challenges (IAA, 2026c). Airlines and passengers should not fund projects that do not materialise. We therefore support the principle at the centre of the Draft Determination, under which the price cap could rise where the major projects are under construction, or fall where none have started (IAA, 2026c). Our ask is that this delivery-linked mechanism be strengthened and made transparent: fund the full programme of critical projects, release that funding against verified delivery milestones, and report publicly on progress.

5. Match the growth forecast with operational resources

The Draft Determination adopts a passenger forecast of 44.5 million by 2031, above daa's own proposition of 42.3 million, while setting operating expenditure allowances below the level daa proposed to serve that growth (IAA, 2026a).

We ask the Authority to satisfy itself that these two positions are consistent. Higher passenger numbers increase staffing, security and resilience requirements; they do not reduce them. Fingal's business community remembers the operational disruption at Dublin Airport in summer 2022, and the reputational and commercial cost it carried for the region. Independently measured passenger satisfaction reached record levels in 2025 (daa, 2026), and the airport earned net service quality bonuses of €0.70 million for 2024 and €1.46 million for 2025 under the Authority's own framework (IAA, 2026b). That performance was built on adequately resourced frontline operations. Raising service quality standards, including seven new passenger satisfaction metrics, while providing for less operational resource per passenger risks setting the airport, and its passengers, up to fail.

6. Keep Dublin competitive for airlines and passengers

The Chamber would not support the argument that higher charges are inherently good for the region. Airport charges are a direct input cost for airlines, including our members, and are reflected in fares paid by passengers and by the many Fingal businesses whose staff, customers and cargo move through the airport every week. Dublin's historically competitive charges have underpinned the route network, connectivity and load factors on which our exporters and tourism businesses depend.

The airline response to the Draft Determination illustrates what is at stake: Ryanair has indicated it would base three additional aircraft in Dublin and add up to two million seats from summer 2027 if the proposed reduction is confirmed (Ryanair, 2026). Growth commitments of that kind carry genuine value for Fingal. They also depend on an airport with the capacity and resilience to accommodate them, which is why charges cannot be assessed in isolation from the investment and operational questions set out above.

The proposed reduction, from an expected cap of €10.39 per passenger in 2026 to approximately €8.85 in 2027 (IAA, 2026a), is a difference of €1.54 per passenger. Our test for the Final Determination is simpler than the debate over that figure: at whatever level charges are set, does the settlement fund the infrastructure and operations that the Authority's own growth forecast requires? A modest, predictable charge trajectory that delivers capacity and resilience will serve airport users better over the period than a lower headline figure that defers investment and stores up congestion and disruption costs for later.

7. Conclusion and requests

Fingal Chamber asks the Authority to secure four outcomes in its Final Determination, and sets out the evidence we will look for in each case:

1. **Fund critical infrastructure in full.** Capital allowances sufficient to deliver the capacity, asset renewal, resilience and sustainability projects the airport requires to serve the Authority's own 2031 forecast.
2. **Link funding to delivery.** A strengthened and transparent mechanism releasing capital funding against verified project milestones, with public reporting, so that users pay only for infrastructure that is built.
3. **Align operating allowances with the adopted forecast.** Staffing, security and resilience resources consistent with the passenger numbers the Authority itself projects, and with the enhanced service quality standards it proposes.
4. **Preserve cost competitiveness.** A charge trajectory that remains competitive among European capital city airports, stable and predictable enough for airlines to plan against.

Dublin Airport is the foundation on which much of Fingal's, and Ireland's, economic success is built. A balanced Final Determination that funds delivery, resources growth and protects competitiveness will serve passengers, airlines, the airport and the region alike. Fingal Chamber makes this submission in that spirit, consistent with our commitment to advancing business together.

Yours faithfully,

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Sources

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