



UPS Response to IAA Draft Determination

September 2026

Background: UPS in Ireland

UPS is one of the world's largest express delivery and logistics companies, playing a vital role in the collection, warehouse and delivery of goods. With a global network spanning 220 countries and territories, we deliver integrated, advanced logistics solutions tailored to meet the needs of Irish exporters and importers.

To meet the increasing demand for precision healthcare logistics and advanced temperature-controlled logistics in Ireland, UPS opened its first healthcare dedicated facility in Dublin in 2024. Ireland has been a key part of our international network since 1988. Over the past three decades, we have continued to expand and deepen our presence across Ireland, now employing approximately 1,000 employees across 19 facilities which include our small package operations, healthcare logistics, supply chain solutions and freight and business services. This sustained investment reflects our long-term commitment to Ireland and to helping Irish businesses compete and grow in global markets.

Summary

UPS welcomes the opportunity to comment on the Irish Aviation Authority's (IAA) Draft Determination on the maximum level of airport charges at Dublin Airport for the 2027–2031 period. This response focuses on the implications for freight connectivity, supply chain resilience, and the long-term competitiveness of Ireland's economy.

Executive Overview

UPS supports the principle of efficient economic regulation and recognises the IAA's objective of protecting airport users from paying for infrastructure that is not delivered. The proposed reduction in airport charges reflects stronger-than-expected passenger and commercial performance in recent years and lower-than-forecast capital expenditure delivery. However, the key question is not whether charges should be lower, but whether the overall regulatory framework provides sufficient certainty and financial support to enable Dublin Airport to deliver the infrastructure required to meet future demand and maintain operational resilience.

From a freight and express logistics perspective, the risks associated with the Draft Determination arise from the cumulative impact of several assumptions, including passenger traffic forecasts, operating expenditure allowances, revenue expectations, and the timing of capital remuneration. If these assumptions prove optimistic, the resulting cashflow constraints could delay strategically important infrastructure investments that are essential to maintaining efficient freight operations.

UPS therefore believes the Final Determination should be assessed not only for affordability but also for its ability to support investment, operational resilience and long-term delivery of critical airport infrastructure.

Importance of Dublin Airport for Freight and National Competitiveness

Dublin Airport plays a critical role as Ireland's primary international trade gateway. Air cargo enables the movement of high-value, time-sensitive goods including pharmaceuticals, medical devices, electronics, manufacturing components, e-commerce shipments and other products that depend on speed and reliability. Delays or capacity constraints can have consequences across wider supply chains, extending well beyond the aviation sector itself.

Freight operations depend on the same core airport infrastructure used by passenger services, including runways, taxiways, aprons, stands, security systems, airside roads and operational resources. As a result, the distinction between passenger and cargo infrastructure is often artificial. Investments intended to improve overall airfield capacity and resilience frequently deliver significant benefits for freight users as well.

UPS considers the efficient development of Dublin Airport infrastructure to be a key contributor to Ireland's competitiveness, inward investment attractiveness and supply chain resilience.

Key Issues Identified in the Draft Determination

Passenger Forecast Assumptions

The IAA forecasts passenger traffic reaching approximately 44.5 million passengers by 2031. UPS recognises the potential for continued growth but notes that achieving these volumes will depend on operational, infrastructure and planning constraints being successfully addressed. The airport will continue to face significant construction activity and capacity pressures during the regulatory period

Higher passenger forecasts lower the per-passenger charge required to recover airport revenues. However, if actual traffic falls below forecast, airport revenues may become constrained while investment and operating requirements remain unchanged. This could place pressure on future infrastructure delivery and service resilience.

Operating Resilience During a Period of Major Construction

UPS supports efficiency and value for money in airport operations. However, major infrastructure programmes inevitably increase operational complexity and place additional demands on airport resources. During construction periods, maintaining reliable access, stand availability, security processing, maintenance capability and airside operations becomes particularly important.

Express logistics operators rely on predictable and time-critical operations. Regulatory allowances should therefore ensure that sufficient operational resilience is maintained throughout the period, particularly where construction activity affects normal airport operations.

Financing and Delivery of Capital Investment

UPS agrees that project triggers and stage-gate mechanisms are useful tools to ensure users only fund projects that genuinely progress. At the same time, major projects incur substantial

costs before they become operational. Planning, design, enabling works and construction commitments all require funding before the benefits of new infrastructure can be realised. [

The Draft Determination recognises the importance of pre-funding in supporting delivery of major projects. UPS believes that an effective regulatory framework should provide confidence that efficient projects will receive timely financial support once objective milestones have been achieved. The focus should be on enabling delivery while maintaining appropriate protections for users through ongoing oversight and reconciliation mechanisms.

Freight Infrastructure Priorities

Eastlands Cargo Development

The Eastlands Cargo project represents one of the most significant freight-related investments within the airport's future capital programme. The project will provide the enabling infrastructure required for future cargo development, including access arrangements, utilities, security provisions and facilities that support future private-sector investment.

UPS views Eastlands as an important strategic project that will help support long-term freight growth and maintain Dublin Airport's role as Ireland's principal air cargo gateway. Delays in enabling infrastructure could also delay associated private investment and the benefits that such investment would bring to national supply chains and trade.

West Apron Connectivity and Operational Continuity

Maintaining effective operations on the West Apron throughout future construction programmes will be essential for freight operators. Aircraft parking, stand availability, access routes and airside connectivity are all important considerations for express cargo services. The underpass is significantly important in ensuring quick access to and from aircraft and our airport facilities. UPS supports investment that protects operational continuity while enabling future airport development.

Recognition of Freight Users

UPS believes that freight users should be more explicitly recognised within the regulatory assessment framework. While cargo activities are reflected in parts of the capital programme, much of the user-interest analysis remains focused on passenger outcomes. Freight operators, cargo airlines, handlers and supply chains are also important users of airport infrastructure, and their operational requirements should be appropriately considered when evaluating investment and service priorities.

We must emphasise that we are not seeking a separate cargo price cap. We only want to highlight the need to recognize that airport users include cargo airlines, integrators, handlers, forwarders and supply chains that require punctuality, stand availability, airside access, maintenance, security and construction resilience in the same way that passenger airlines do.

Conclusion

UPS supports a regulatory framework that balances affordability with the need to maintain investment, resilience and future growth. While the Draft Determination contains important safeguards for users, care should be taken to ensure that the combined effect of lower charges, ambitious traffic assumptions and conditional capital remuneration does not unintentionally weaken the airport's ability to deliver critical infrastructure.

A financeable and delivery-focused settlement is in the interests of all airport users, including freight operators and the wider economy. Dublin Airport's future capacity, resilience and connectivity will play an important role in supporting Ireland's international trade, economic competitiveness and supply-chain performance throughout the 2027–2031 period.

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