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April 28, 2024

By email to: consultation@iaa.ie , Luke.Manning@IAA.ie , adrian.corcoran@iaa.ie

Re: Aer Lingus Response to the IAA Consultation on the Timeline for the 2026 Determination on the Maximum Level of Airport Charges at Dublin Airport

Dear Adrian,

Aer Lingus welcomes the opportunity to respond to the IAA consultation on the proposed timeline for the 2026 Determination on the Maximum Level of Airport Charges at Dublin Airport. Our submission is made with the concurrence of IAG and its operating companies, who support the position outlined by Aer Lingus.

We acknowledge the importance of establishing a structured and transparent framework for setting airport charges, and we broadly support the proposed timeline and sequencing of consultation steps as outlined in the consultation document. The planned early publication of the Issues Paper in June 2025 and the subsequent opportunity for stakeholders to contribute meaningfully to the Draft Determination are particularly welcome.

We note the IAA's intent to balance meaningful stakeholder engagement with the timely publication of the Final Determination in November 2026. However, we wish to highlight that the proposed timing, coming so close to year-end, could introduce significant uncertainty regarding the level of airport charges that will apply from Summer 2027. We note that previous Determinations have been issued in October. The narrow window between the Final Determination and the implementation period may also limit stakeholders' ability to thoroughly assess the outcome and its implication on their pricing. In addition, given that appeals against a Determination are now by way of a statutory appeal to the High Court which, unlike the previous appeal panel procedure, are not subject to a prescribed timeline, we would encourage the IAA to revisit this aspect of the timeline to allow for the issuance of the Final Determination as soon as possible.

Furthermore, we support the continuation of a consultative approach that facilitates early engagement, as seen in the planned Dublin Airport-led consultations in late 2025. We believe that a well-structured process with clear touchpoints will contribute to regulatory certainty and better outcomes for all market participants, including passengers.

Aer Lingus remains fully committed to engaging constructively with the IAA throughout the 2026 Determination process and beyond. We appreciate the collaborative spirit reflected in this consultation and look forward to continued dialogue on this and other matters of mutual importance.

Yours sincerely,



Chief Strategy and Planning Officer