

Dr Adrian Corcoran
Director of Economic Regulation, Consumer Affairs and Licensing
Irish Aviation Authority
The Times Building
11/12 D'Olier Street
Dublin 2

25 September 2025

Reference: Consultation on Summer 2026 Coordination Parameters Dublin Airport

Dear Adrian,

Aer Lingus welcomes the opportunity to respond to the Irish Aviation Authority's (IAA) Draft Decision on the Summer 2026 Coordination Parameters at Dublin Airport. We acknowledge the detailed modelling and stakeholder engagement undertaken as part of this process. However, we wish to raise several concerns regarding specific elements of the proposed coordination parameters.

1. Runway Parameters – 0600 UTC Hour

As stated at the Coordination Committee meeting on 28 August, Aer Lingus does not support the declaration of additional slots in the 0600 UTC hour.

The modelling presented by To70 during the Coordination Committee process highlighted stand congestion and elevated taxi-in delays during the morning peak, particularly between 0600 and 0700 UTC. These findings were consistent with To70's modelling calibration, our own operational experience and therefore reflect a material constraint on airfield performance.

We believe the decision to increase arrivals in this hour does not adequately account for the operational risks identified. Specifically:

- The stand constraint remains a limiting factor, even with the North Runway operational from 0600 UTC
- The simulated increase in delays during this period suggests a degradation in performance that could impact on OTP and passenger experience.
- The lack of mitigation measures for stand congestion undermines the rationale for increasing capacity.

Aer Lingus therefore urges the IAA to retain the existing S25 limits for the 0600 hour and defer any increase until further infrastructure or procedural enhancements are in place.

We support the changes in capacity in the other hours

2. Terminal 2 Departures Hourly Limit

Aer Lingus notes the IAA's decision to adopt the uplift to the Terminal 2 departures hourly limit, despite the Coordination Committee vote against this proposal.

Aer Lingus notes thought that the CC outcome advice was influenced by airlines who do not operate from Terminal 2 voting against the proposal and not providing supporting arguments or evidence to justify this position. Therefore, we support the IAA's draft decision to uplift capacity to 4,200 per

hour from the current 3,600 now that the full EDS CB C3 cabin baggage screening has been rolled out, tested and proved viable throughout the course of the Summer 2025 season.

3. US Preclearance Coordination Parameter

Aer Lingus supports the proposed hourly coordination parameter for US Preclearance as the first step in removing the current process of referrals by the airport slot coordinator (ACL) to the airport for clearance.

As the largest user of the US-CBP facility, we are particularly exposed to the inherent delay built into the process current of referrals. This delay does not allow for immediate response to request for schedule adjustments during the current season.

Having a formal limit in place will enable immediate clearance of slots and allow Aer Lingus and other airlines to communicate these changes faster with our passengers.

4. Stand Coordination Parameters Trial

Aer Lingus supports the principle of reducing referrals through structured coordination parameters. However, we emphasise the importance of:

- Robust monitoring throughout the S26 season
- Transparent governance of the working group
- Flexibility to adjust parameters based on real-time performance.

Aer Lingus welcomes the opportunity to participate in the working group and contribute to the evaluation of the trial.

5. Nighttime Slot Allocation

Aer Lingus supports the decision not to restrict night-time slot allocation to historic slots only for S26. We agree that, pending legal clarity on the North Runway operating restrictions, maintaining flexibility is appropriate.

In conclusion, Aer Lingus supports efforts to optimise declared capacity at Dublin Airport but urges caution where modelling and operational experience indicate clear risks. We therefore respectfully request that the IAA reconsider the proposed changes to the 0600-hour runway limits and adopt a more measured approach to capacity increases in constrained periods.

We remain available to engage further on these matters and appreciate the opportunity to contribute to this consultation.

Yours sincerely,



Steve Ronald
Director of Schedules Planning and Alliances