IAA | ÚDARÁS EITILTÍOCHTA NA hÉIREANN
IRISH AVIATION AUTHORITY

Final Decision on Summer 2026 Coordination Parameters at Dublin Airport

02 October 2025

Contents

1. Executive Summary

1.1 The IAA is responsible for declaring coordination parameters at coordinated Irish airports. In this paper we set out our Final Decision on the Dublin Airport parameters for the Summer 2026 ('S26') season, which runs from 29 March to 24 October 2026 inclusive.[1] The coordination parameters are laid out in the appendix.

1.2 The Final Decision remains in line with the Draft Decision. We have therefore made the following changes relative to the Summer 2025 ('S25') parameters:

- Implemented the 'S26 Wishlist' hourly runway capacity ('R60') limits, which involves a range of increases in the declared runway limits in the day hours, adding 8 departure, 8 arrivals, and increasing the total limits by 25 per day.
- The wording of the stand referral parameter is amended to reflect the intended trial to reduce the scope of stand referrals. Stand counts are also updated to reflect expected changes by apron area relative to S25.
- With respect to terminal parameters, the departures hourly limits for both Terminal 1 and Terminal 2 are increased to 4,625 and 4,200 respectively. An hourly passenger US preclearance processing limit of 1,450 is implemented and replaces the S25 US Preclearance referral parameter on new flights and schedule changes.
- We have not included any seasonal seat cap coordination parameter (or otherwise taken account of the 32mppa Conditions), in line with the High Court Order of 15 April 2025.

1.3 Other coordination parameters are unchanged relative to S25.

1.4 We have relied on a range of evidence, and considered the advice provided by the Coordination Committee. We commissioned fast-time simulation modelling of the airfield to assess a range of scenarios relating to potential increases in the runway limits. This work was carried out by To70. The assessment of these scenarios takes the form of a comparison of a range of airfield metrics. The results from this assessment were shared with the Coordination Committee, and the final report was published alongside the Draft Decision.

1.5 We have considered other evidence with which we have been presented, or which we sought. This evidence includes modelling work conducted by Dublin Airport, and its consultants.

1.6 We have also considered the submissions which we received in response to the Draft Decision, published on 11 September 2025 (the 'S26 Draft Decision'). Submissions were received from:

- Aer Lingus
- daa
- Ryanair
- St Margarets the Ward ('SMTW') Residents Group

[1] As per the worldwide slot calendar: WASG Calendar

2. Background

2.1 Section 8(1) of the Aviation Regulation Act, 2001, as amended, provides that the IAA is the competent authority in Ireland for the purposes of Council Regulation (EEC) No. 95/93, as amended (the 'Slot Regulation'). The IAA is therefore responsible for:

- The designation of the Coordination status of Irish airports.
- Appointing a qualified schedules facilitator or coordinator, as appropriate, at airports which have been designated as Schedules Facilitated or Coordinated.
- The determination of coordination parameters at Coordinated airports in line with Article 6 of the Slot Regulation, taking account of relevant technical, operational and environmental constraints as well as any changes thereto.
- Deciding whether to approve Local Guidelines proposed by the Coordination Committee.

2.2 Dublin Airport is designated as Coordinated by the IAA. Airport Coordination Limited (ACL) is the appointed coordinator.

2.3 Under Article 5 of the Slot Regulation, one of the roles of the Coordination Committee is to advise the IAA on the coordination parameters to be determined in accordance with Article 6. The IAA attends Coordination Committee meetings as an observer.

2.4 Article 6(1) states that the determination of the parameters *'shall be based on an objective analysis of the possibilities of accommodating the air traffic, taking into account the different types of traffic at the airport, the airspace congestion likely to occur during the coordination period and the capacity situation'*. Thus, the determination of the parameters is a forward-looking projection in which we must take account of expected demand, capacity (including airspace capacity), and relevant constraining factors, during the relevant season, in an objective manner. This is primarily assessed through simulations of the operation of a forecast S26 flight schedule at the airport.

2.5 Article 6(3) of the Slot Regulation details the required interaction between the IAA and the Coordination Committee:

'The determination of the parameters and the methodology used as well as any changes thereto shall be discussed in detail within the coordination committee with a view to increasing the capacity and number of slots available for allocation, before a final decision on the parameters for slot allocation is taken. All relevant documents shall be made available on request to interested parties.'

2.6 In that regard, as per previous seasons, when taking account of relevant constraints in issuing a capacity declaration, we tend towards a maximal rather than minimal approach as regards declaring the airport capacity parameters. This is because of the requirement that discussion within the coordination committee is *'with a view to increasing the capacity and number of slots available for allocation'*. This framing of the determination of the parameters is given further weight where a parameter is expected to have a constraining effect on demand, given that Article 6(1) requires the determination to be based on the *'possibilities of accommodating the air traffic'*.

Coordination Committee engagement process

2.7 To help inform the decision on the parameters, we engaged To70 to carry out simulations of the expected flight schedule for S26, using the Fast Time Simulation model of the apron,

airfield, and terminal airspace. This model was originally developed for us in 2017 and has been updated regularly to include changes to infrastructure and operational procedures. It has been used for various simulation exercises since, including the determination of the coordination parameters.

2.8 Prior to running the simulations, To70 re-validated the model. This involves simulating the flight schedule on a recent day of operations and comparing the simulated airfield metrics (such as taxi time durations and runway throughput) with actual observed metrics on the same day. If necessary, adjustments are made to the model, and the process is repeated until a satisfactory result is obtained whereby the model is replicating the actual operation with a sufficient degree of accuracy.

2.9 Airlines were asked to submit plans for Summer 2026 to ACL. Analysis carried out by ACL indicated that increases in the runway limits would be required to ensure that these plans could be fully facilitated. A number of changes to the hourly runway (R60) limits relative to S25 were proposed by Dublin Airport, informed by the analysis carried out by ACL.[2]

Table 2.1: Dublin Airport S26 Wishlist Proposal for Summer 2026

UTC Hour*	Arrival	Departure	Totals
0600	+2		+2
0700	+3		+3
0800		+1	
1000	+1		+2
1100			+3
1200		+1	+3
1400		+3	+3
1600	+1		+2
1700		+2	+4
1800			+2
1900		+1	
2100	+1		+1
Total	**+8**	**+8**	**+25**

Source: Coordination Committee

2.10 Information provided by airlines was used to develop an anticipated flight schedule on a busy day in Summer 2026, the "S26 Schedule". The operation of the S26 Schedule was simulated by To70. To assess the effect of a potential decision to adjust the R60 parameters as proposed above, To70 coordinated the S26 Schedule according to both the S26 Wishlist limits, and alternatively the current S25 runway limits. In addition, both scenarios were tested with the North Runway operational from 0600 UTC (the current operational practice), and from 0500 UTC (the proposed change based on the An Coimisiún Pleanála (ACP)[3] decision on the North Runway Relevant Action, discussed in more detail in Section 3). Comparisons

[2] All references to times or hours are in UTC 24-hour format, unless stated otherwise. Where a reference is made to a particular hour, such as the 0500z hour, this refers to the time period one hour in length commencing from the stated time. To give an example, the 0500z hour spans from 5 am to 6 am UTC. During the summer season, UTC time is one hour behind Local time (indicated with an 'L'). Hence, the 0500z hour spans from 6am to 7am local time.
In each hour, a requested departure slot must not bust the hourly Departures limit or the hourly Total limit, while a requested arrival slot must also not bust the hourly Arrival limit or the hourly Total limit.
[3] 314485 | An Coimisiún Pleanála -

were provided between simulated taxi times, ground delay and runway holding delay. Further details and results of this analysis is set out in Section 3, and the results of the To70 simulations are published alongside this document.

2.11 In relation to the passenger terminal (PTB) parameters, Dublin Airport proposed to increase the Terminal 2 departures hourly limits to 4,200, up from 3,600 in S25. No change was proposed in respect of the Terminal 1 departure or arrivals hourly limits, or the Terminal 2 arrivals hourly limits. It was noted that the full complement of EDS CB C3 cabin baggage screening equipment in both terminals will be completed by the end of 2025, but that as old security lanes are taken out of service to allow further installation, it is prudent to hold the current (S25) departure parameters for Terminal 1 until the full complement of lanes are available and sufficient data is generated to estimate any revised terminal capacity parameter. On the other hand, the Terminal 2 installation was already completed ahead of this summer. It was stated that under the revised Terminal 2 departure hourly limits, and the S25 Terminal 1 and Terminal 2 arrival hourly limits, the forecast demand can be accommodated, i.e. the PTB limits are not expected to be a constraining factor on the allocation of slots.

2.12 With respect to referral parameters, Dublin Airport proposed the removal of the US Preclearance referral, to be replaced with a new passenger processing hourly limit coordination parameter of 1,450. It was noted that all S25 demand fits within the proposed hourly processing limit, with just the 1000 and 1500 hours (UTC) coming close to the hourly limit.

2.13 Dublin Airport also outlined a trial in S26 with a view to progressively reducing or eliminating referrals in respect of aircraft stands. The current stand referrals approach is broad, and includes as follows:

Table 2.2: Current Aircraft Stand Referrals

Current Referral	
Widebodies	Any new request or retime for any widebody including code D, E, F.
US Preclearance	Any new flight or retime (S25 arrivals 0500-1330L and departures 10300-1330) and (W24 departures 0930-1230L)
Special Events	Block for specific dates to specific country
Overnight Parking	Arrivals between 2200-0800L of non-based carriers or turnarounds with overnight indicator of 1 or more. Captures retimes to night cargo too.
Lourdes	Flights to and from Lourdes
New Operator	New carriers to be referred

Check-In	Referral made at initial coordination for airport to check prior to slot confirmations (SAL)
Hangar	Non-based narrowbody carriers service type P with no linked departure (widebodies are captured by widebody PPR)

Source: Coordination Committee

2.14 Dublin Airport explained that the proposed trial would be monitored throughout the S26 season in conjunction with ACL and Dublin Airport operations to determine if referral parameters should be permanently replaced. Dublin Airport proposed the following. It was suggested that while the trial is ongoing, the application may be altered as appropriate.

Table 2.3: Aircraft Stand Initial Trial Parameters for S26

Parameter	Description
Parameter 1: Overnight parking parameter to replace overnight referrals	Overnight parking up to a maximum of 6no NBE or 2no Wide Body aircraft between 2100-0700 UTC for non-based carriers or turnarounds with overnight indicator of 1 or more. Departure must be before 0430 UTC or after 0730 UTC (Note: parameter excludes based carriers, scheduled cargo and general aviation aircraft. 1WB = 2NBE aircraft).
Parameter 2: Special events referral[4]	Special events and sporting events where high volumes of charter and positioner flights are expected to continue to be referred to Dublin Airport for a detailed assessment.
Parameter 3: CBP flight parameter to replace stand referral	21no NBE stands for up to a maximum of 9no WB departures or 21 NBE departures plus one daily remote departure. - Ground times based on turnaround information submitted - Where no turn information is provided, wide bodies have an assumed maximum of 125 minutes on stand prior to departure, NBE assumed to have 110 minutes on stand prior to departure which includes 15 minutes for towing - Any ground time greater than 3 hours may be towed off stand 45 minutes after arrival - Dublin Airport may reduce ground times prior to departure to maximise stand utilization and facilitate existing services
Parameter 4: Non-CBP wide body passenger operations to replace stand referral	No more than 10 WB arrivals or non-CBP departures in any 2-hour period for scheduled and non-scheduled passenger operations.

[4] This is a proposed to remain as a referral parameter for S26.

	- Ground times based on turnaround information submitted - Where no turn information is provided, wide body have an assumed maximum of 125 minutes on stand prior to departure which includes 15 minutes time for towing - Any ground time greater than 3 hours may be towed of stand 45 minutes after arrival - Dublin Airport may reduce ground times prior to departure to maximise stand utilization and facilitate existing services

Source: Coordination Committee

Note: 'WB' = Wide Body, 'NBE' = Narrow Body Equivalent. 1WB = 2NBE aircraft.

2.15 No other changes were proposed relative to the Summer 2025 limits, except updating the stand count by apron area to reflect expected changes in the count relative to Summer 2025.

2.16 The pre-meeting of the Coordination Committee took place on 18 August 2025. At this meeting, the To70 simulation modelling results were discussed. Dublin Airport also presented various pieces of analysis and modelling results to Committee members, namely:

- An update on airfield performance, On Time Performance (OTP) in Summer 2025 compared to Summer 2024, prospective projects expected to be delivered for Summer 2026, projects that are expected to be under construction in Summer 2025.
- Simulation modelling carried out for Dublin Airport by ARUP.
- An update from ACL.
- Coordination parameter proposals for Summer 2026.

2.17 At the pre-meeting of the Coordination Committee, Dublin Airport also provided an update on ACP's Final Decision on conditions relating to the planning permission for the North Runway. Dublin Airport outlined the following:

- North Runway Operating Hours: Runway 10L/28R shall not be used for take-off or landing between 0000 and 0600 (local time) except in cases of safety, maintenance considerations, exceptional air traffic conditions, adverse weather, technical faults in air traffic control systems or declared emergencies at other airports where Runway 10L/28R length is required for a specific aircraft type.
- Implementation of a night-time noise quota: The Airport shall be subject to a Noise Quota Scheme (NQS) with an annual limit of 16,260 between 2300 and 0700 (local time) with noise-related limits on the aircraft permitted to operate at night.
- Implementation of a night-time movement cap: The airport shall be subject to an annual aircraft movement limit of 35,672 between the nighttime house of 2300 and 0700 (local time).
- Changes to the noise insulation scheme

2.18 Dublin Airport stated its belief that:

'It is highly likely that the Nighttime restrictions decision will be judicially reviewed which may delay the implementation of any movement caps. While the outcome of future legal proceedings cannot be guaranteed, and the possibility of a movement cap remains, it is prudent to continue to freeze any capacity increases in the nighttime until we have clarity on the

operating restrictions.'

2.19 Dublin Airport also outlined that current slot holdings for S25 and W25 for Scheduled services are within c.6% of the movement cap based on schedule time that has been adjusted for taxi time to estimate the Runway time. When the North Runway is opened from 0600 local time, in line with the ACP Decision, flights that currently do not hit the runway before 0700 will take-off before 0700, which is estimated to increase nighttime flights to within 2% of the movement cap. The Airport therefore presented a question to the Coordination Committee on whether the Coordination Committee should also discuss proactive measures to prevent increases in nighttime slot utilisation during S26, with a view to avoiding a possible requirement for reductions in future scheduling periods.

Coordination Committee vote

2.20 The Coordination Committee met again on 28 August 2025 to finalise its advice for the IAA in respect of S26.

2.21 At this meeting, Dublin Airport stated that one member of the Coordination Committee had requested a review of the current C3 lanes in Terminal 1 to identify if any improvement could be made for S26, given that the C3 installation will be complete in time for S26. As a result of this analysis, Dublin Airport updated its proposal for the Terminal 1 passenger departures hourly limit from 4,130 as initially proposed (i.e. a roll-forward from S25), to 4,625. No changes relative to S25 were proposed to the arrivals hourly passenger limits for either Terminal 1 or Terminal 2.

2.22 Clarification was sought by Aer Lingus on the To70 calibration modelling of taxi-in times in the early morning hours, whereby some spikes of delay were apparent in the actual data. In addition, Aer Lingus referred to the S26 modelling results and noted similar increases in the morning taxi-in time with the additional arrival slots in the 0600 – 0700z hours. To70 clarified that during the calibration process, there were some taxi-in peaks which were usually related to aircraft waiting for stands, which was similarly observed in the S26 Wishlist modelling. To70 further clarified that although the model is calibrated to behave using set rules, the real-life scenario can be different as ATCOs can make tactical decisions. Aer Lingus asserted its concern over potential delays in these hours.

2.23 Clarification was also sought by British Airways on whether wide body maintenance at the airport would be exempted from the proposed stand parameter No.1. Dublin Airport confirmed that there would be no exemption for wide body maintenance and provided its justification in this respect.

2.24 On a proposed working group to provide input into the proposed S26 stand parameters trial, Aer Lingus welcomed the establishment of a working group, but queried, as some airlines are not impacted by all proposed parameters, whether the proposal was for one working group, or individual groups aligned with each proposed parameter. Dublin Airport clarified that within the working group, the views of all airlines would be considered, but stated, by way of example, that carriers who operate US flights may wish to have more involvement than those who do not, in respect of the proposed stand parameter No.3.

2.25 Coordination Committee members voted on the proposed parameters. In addition, Dublin Airport asked Coordination Committee members to vote on the following question in light of the ACP Decision in respect of the North Runway Relevant Action:

'Pending clarifications of restrictions on nighttime activity in Dublin airport, should the allocation of nighttime slots (between 2300-0700 local) be limited to those with historic status

in S26?'

2.26 Voting rights for Committee members are set out in the Coordination Committee constitution. A set number of votes are allocated to Dublin Airport and AirNav Ireland (the Air Navigation Services Provider at Dublin Airport), with the rest allocated to airlines based on the number of movements flown at Dublin Airport in the preceding year, meaning that most of the voting weight is held by airlines and, in particular, Ryanair and Aer Lingus. Only those present (online or in person) can vote.

2.27 We note that the voting process is an indicative part of the Coordination Committee's advice to the IAA, rather than the IAA being bound by the result. As part of the process, we seek to take into account all positions set out by Coordination Committee members as well as any associated comments or evidence relevant to the parameter declaration. Overall, a majority voted in favour of the S26 Wishlist limits in all hours where additional capacity was proposed. No change was proposed in respect of the 10-minute runway limits.

2.28 The Coordination Committee voted in favour of increasing the departing passenger parameter for Terminal 1, with 52% of the vote in favour, 5% against, and 43% abstaining. With respect to the proposal to increase the Terminal 2 departing passenger parameter, the majority of the vote was against this proposal (40% in agreement, 56% against, and 4% abstaining). This result was primarily driven by Ryanair's control of 44% of the Coordination Committee's voting rights and its vote against the proposal. As a result, the PTB capacity proposed by the Coordination Committee is to implement the increased Terminal 1 departing passenger parameter, and not to adopt the increased Terminal 2 departing passenger parameter. No proposals were made in respect of the arrivals PTB hourly limits.

2.29 The Coordination Committee also voted not to adopt the proposed new CBP passenger processing hourly parameter with 46% opposed to the proposal and 32% in favour (22% abstained from the vote). This result was also largely driven by the vote of Ryanair, with just United Airlines, Swiss, Jet Blue, and daa also opposing the proposal.

2.30 On the proposal to introduce trial stand parameters which are intended to replace some of the referral parameters for aircraft parking stands, the majority of airlines abstained from the vote. However, the remaining vote was in favour of the proposal (35% in favour compared with 5% against). We note the Coordination Committee letter of advice states these proposed parameters may be altered throughout the S26 trial on the recommendation of a working group, to ensure they are fit for purpose. This issue is considered further in Section 3 below.

2.31 On the final vote before the Coordination Committee as to whether the allocation of nighttime slots (between 2300 and 0700 local time) should be limited to those with historic status in S26, the majority of the coordination voted against this proposal, with 76% of the vote against, and 21% in favour. Less than 3% of the vote indicated abstention.

2.32 Thus, the overall advice of the Coordination Committee was as follows:

- Implement the S26 Wishlist to the runway coordination parameters in all hours.
- To increase the Terminal 1 departures PTB parameter, and not to adopt the proposed Terminal 2 increased parameter. There were no proposals in respect of the Terminal 1 and 2 arrivals hourly limits.
- Not to introduce a US Preclearance passenger processing hourly parameter in place of the current referral.
- To adopt the proposed adjustment parameters in place of the stand referrals.

- Not to limit the allocation of slots to those with historic status in the nighttime period 2300 – 0700L in S26.

3. Airfield Coordination Parameters

3.1 This section addresses, in turn:

- Runway parameters
- Stand parameters

3.2 In relation to the runway coordination parameters, we have decided to implement the S26 Wishlist for the S26 season, as shown in Table 3.1.

Table 3.1: Changes to runway limits for Summer 2026 (S26 Wishlist)

UTC Hour*	Arrival	Departure	Totals
0600	+2		+2
0700	+3		+3
0800		+1	
1000	+1		+2
1100			+3
1200		+1	+3
1400		+3	+3
1600	+1		+2
1700		+2	+4
1800			+2
1900		+1	
2100	+1		+1
Total	**+8**	**+8**	**+25**

Source: IAA

3.3 We make no changes to the respective R10 limits for dual and single runway operations.

3.4 We retain the stand parameter as a hard constraint, while amending the scope of the referral parameter to allow for a trial in respect of the potential replacement of stand referrals in future seasons.

Runway Capacity

3.5 In this subsection, we consider runway capacity limits.

To70 airfield modelling

3.6 As described above, To70 first validated the airfield model and then simulated the S26 flight schedule under the following scenarios:

1. North Runway Open from 0600 UTC

- S26 flight schedule coordinated to the proposed S26 Wishlist limits
- S26 Wishlist flight schedule coordinated to the existing S25 limits

2. North Runway Open from 0500 UTC

- S26 flight schedule coordinated to the proposed S26 Wishlist limits
- S26 Wishlist flight schedule coordinated to the existing S25 limits

3.7 The model calibration process was based on 30 May 2025, using actual block times. The simulated metrics (taxi out times, runway throughput, counts of aircraft coming on block, off block, lifting off and touching down) show a close match with the actual data both in magnitude and daily profile.

3.8 Taxi out time measures the time elapsed from the aircraft coming off blocks until it crosses the runway stopbar. Departure ground delay is the accumulation of all delay experienced in the same period, i.e. all components of taxi-out time other than unimpeded taxi-time. The estimated effect of proposed airfield capacity increases on these metrics is, in our view, the best way to assess the infrastructural and operational capacity of the airfield to deliver a flight schedule.

3.9 Efficient towing of aircraft occurs in the model. Taxiway, towing, runway, and runway exit usage restrictions and patterns have been implemented in the model. Given the close match in the model validation outputs, it is our view that no significant airfield capacity affecting element has been omitted from the model. Airfield infrastructure was updated in the model, based on the expected situation during S26 in relation to taxiway closures for works and projects expected to be complete. No changes are assumed in respect of operating procedures for minimum aircraft separations.

3.10 In each scenario, for the purposes of properly assessing airfield/runway capacity only, it is presumed that the Summer 2026 schedule of increased demand materialises as expected. We have previously observed a general pattern whereby airlines may accept sub-optimal slots (whether in relation to timing, series fragmentation, or both) in order to meet demand for an operation. In order to capture this trend, our baseline scenario assumes that this redistribution effect occurs, with these new services operating at the nearest available time, given the effective runway limits for that scenario, in the simulation.

3.11 The Summer 2026 flight schedule was based on expected S26 demand, but also with sufficient operations to properly test out the proposed R60 capacity increases. It contains a total of 877 flights, with 441 arrivals and 436 departures. The flight schedule included 43 new arrivals and 37 new departures. Most of these movements could be accommodated at the times requested without any changes to the runway limits.

3.12 This level of assumed growth means that some of the modelled operations may not materialise in S26, and thus the schedule can be considered as an aggressive growth scenario, with a likelihood that the performance metrics produced by the model may be worse relative to those likely to be observed if growth is weaker. Nonetheless, we consider it important to fully test out the potential impact of a decision to increase the capacity, and that capacity is used. To assess the effect of a decision to implement the S26 Wishlist relative to maintaining the S25 limits, we asked To70 to simulate the S26 Schedule scenario.

3.13 Table 3.2 summarises the results of the S26 Wishlist and the S25 limits simulations, with the North Runway operational from 0600 UTC under both scenarios, as provided to the Coordination Committee. Further details are set out in the To70 simulations published alongside the S26 Draft Decision.

Table 3.2: Departure Taxi Out Time under S25 limits and S26 Wishlist Proposal (NR Operational from 0600 UTC)

Time (UTC)	S26 Wishlist Limits	S25 Limits	Difference
Daily average	00:10:23	00:10:21	00:00:02
Peak	00:15:42	00:16:12	00:00:30

Source: To70, Slide 19. Taxi times in hours, minutes and seconds.

Peak times refer to the window with the highest average value. Values are in hours, minutes and seconds.

3.14 Relative to maintaining the S25 limits unchanged, the S26 Wishlist proposal is not expected to have a material impact on taxi-out times on average across the day, or on peak taxi-out times, with the North Runway operating from 0600 UTC.

3.15 Table 3.3 summarises the results of the S26 Wishlist and the S25 limits simulations, with the North Runway operational from 0500 UTC under both scenarios. Relative to maintaining the S25 limits, there is little difference in average taxi-out times under the S26 Wishlist. However, peak taxi-out times are 00:01:12 greater under the S26 Wishlist compared with maintaining the S25 limits. As anticipated, when comparing the situation with the North Runway operational from 0500 UTC as against 0600 UTC, the peak taxi-out times reduce significantly in the former scenario (by 2-3 minutes), as the first wave departures operate from the North Runway in segregated mode.

Table 3.3: Departure Taxi Out Time under S25 limits and S26 Wishlist Proposal (NR Operational from 0500 UTC)

Time (UTC)	S26 Wishlist Limits	S25 Limits	Difference
Daily average	00:10:22	00:10:13	00:00:11
Peak	00:14:30	00:13:18	00:01:12

Source: To70, Slide 25. Taxi times in hours, minutes and seconds.

Peak times refer to the window with the highest average value. Values are in hours, minutes and seconds.

Other Modelling

3.16 Dublin Airport commissioned ARUP to carry out simulation modelling on its behalf, which was also presented to the Coordination Committee. Modelling by ARUP showed similar results, but with less of a pronounced difference in the peak taxi-out time between the S25 limits and S26 Wishlist limits under the scenario whereby the North Runway is in operation from 0500 UTC.

Taxi Out times and On Time Performance (OTP) in Summer 2025

3.17 At the Coordination Committee pre-meeting, Dublin Airport provided an update on outturn operational performance in Summer 2025 compared to Summer 2024, from April to July inclusive. Both arrival and departure On Time Performance (OTP) has improved in each month of S25 (to July) compared with the same period of S24. Overall, OTP stood at 71% for S25, 4 percentage points better than S24.

3.18 Across the full day, average taxi-out times to RW 28R disimproved marginally compared with S24. Average taxi-out times in S25 were 14 mins 46 secs, compared with 14 mins 08 secs in S24 (measured over April – July for both seasons). Comparably, average taxi-in times across the whole day have marginally reduced, by 18 seconds in S25 relative to S24, while the average first-wave taxi-in time has disimproved by 9 seconds.

3.19 A number of airfield, terminal, and pier projects are expected to be available in whole or in part for the S26 season. These are shown in Table 3.4 below:

Table 3.4: Major projects expected for S26 relative to S25

Airfield	Terminals and Piers
Dual code E taxiways B1/Z to South Apron	T1 Security C3 upgrade & T1 Central Search to mezzanine
Work in progress on LVP on RWY 10L and RWY10 seg LVP operations for Summer 2026	51st and Green refurbishment
B2 bi-directional	T1 lounge refurbishment
P1W stands complete – TWY F-INNER becomes Code E compliant	
Apron 5H & MRO stands available full season	

Source: Coordination Committee

Draft Decision

3.20 Under the Slot Regulation, the runway parameters are to be reviewed with a view to increasing the capacity and number of slots available for allocation, based on an objective analysis of the possibilities of accommodating the air traffic.

3.21 We proposed to amend the hourly runway limits in accordance with the S26 Wishlist for the following reasons:

- The evidence from the simulations, which take account of infrastructural, operational, and environmental constraints, suggests that the additional capacity proposed can be accommodated by the parallel runway system without any material causative impact on delay. This stands under both scenarios of the North Runway being operational from 0500z and from 0600z.
- None of the other evidence outlined above suggests any deteriorating performance trends.
- Based on the Coordination Committee vote, our proposal aligns with the advice of the Committee.

3.22 We noted that in recent capacity declarations, we have sought to take account of the potential constraining factor represented by Condition 5 of the North Runway planning permission, as imposed in 2007. On 16 July 2025, ACP published the Relevant Action Decision. The Relevant Action Decision revokes Condition 5 of the North Runway Planning Permission and replaces it with a NQS:

First Condition:

The existing operating restriction, Condition 5, of the North Runway Planning Permission (FCC Reg. Ref: F04A/1755; ABP Ref: PL06F.217429) reading as:

'On completion of construction of the runway hereby permitted, the average number of night time aircraft movements at the airport shall not exceed 65/night (between 2300 hours and 0700 hours) when measured over the 92 day modelling period as set out in the reply to the further information request received by An Bord Pleanála on the 5th day of March, 2007'

shall be revoked and replaced with an annual noise quota scheme operating restriction as follows:

The Airport shall be subject to a Noise Quota Scheme (NQS) with an annual limit of 16,260 between 23:00 and 07:00 (local time) with noise-related limits on the aircraft permitted to operate at night.

3.23 A number of other conditions are included in the decision, including:

Second Condition:

The existing operating restriction imposed by Condition 3(d) and the exceptions at the end of Condition 3 of the North Runway Parallel Runway Planning Permission (FCC Reg. Ref: F04A/1755; ABP Ref: PL06F.217428) reading:

'3(d). Runway 10L-28R shall not be used for take-off or landing between 2300 hours and 0700 hours except in cases of safety, maintenance considerations, exceptional air traffic conditions, adverse weather, technical faults in air traffic control systems or declared emergencies at other airports.'

shall be amended as follows:

Runway 10L/28R shall not be used for take-off or landing between 00:00 and 06:00 (local time) except in cases of safety, maintenance considerations, exceptional air traffic conditions, adverse weather, technical faults in air traffic control systems or declared emergencies at other airports or where Runway 10L/28R length is required for a specific aircraft type.

Third Condition:

The airport shall be subject to an annual aircraft movement limit of 35,672 between the nighttime hours of 2300 and 0700 (local time).

3.24 On 8 August, ACP notified the European Commission of the operating restrictions pursuant to Article 8(1) of EU Regulation 598/2014[5]:

'Before introducing an operating restriction, the competent authorities shall give to the Member States, the Commission and the relevant interested parties six months' notice, ending at least two months prior to the determination of the slot coordination parameters as defined in point (m) of Article 2 of Council Regulation (EEC) No 95/93 for the airport concerned for the relevant scheduling period.'

3.25 We noted that, as anticipated, judicial reviews of ACP's Relevant Action Decision have now been launched. Further, we stated we are not aware of whether the European Commission has confirmed the completeness and/or validity of the notification pursuant to Article 8 of Regulation 598/2014. We noted that, in all events, the first and third conditions above are new operating restrictions which have not been introduced in time for S26, and therefore are not relevant constraints for S26 such that they could be taken account of either directly or indirectly.

3.26 In the interim, we noted that the Coordination Committee had again proposed that no changes are made to the R60 limits in the night hours relative to those which were in place prior to completion of the North Runway. This would again mean that no capacity has been added between 2300 and 0700 local time since completion of construction of the North Runway, meaning that the North Runway cannot lead to more flights in this period than were previously possible under the single Runway 28L based capacity declaration. We proposed

[5] Regulation - 598/2014 - EN - EUR-Lex

to continue to adopt this approach for S26, which also means that the question of the timing of when the second condition above actually takes effect (i.e. alongside the measures which are newly imposed operating restrictions, or sooner than that) is moot for the purposes of the runway coordination parameters for S26.

Responses to the Draft Decision

3.27 Aer Lingus submits that, as it stated at the Coordination Committee meeting of 28 August, it does not support additional capacity in the 0600 UTC hour. It asserts that the modelling presented by To70 highlighted congestion and elevated taxi-in delays during the morning peak, particularly between 0600 and 0700 UTC, consistent also with To70's model calibration exercise and its own operational experience. This evidence, it asserts, reflects a material constraint on airfield performance.

3.28 Aer Lingus further states its belief that the decision to increase arrivals in this hour (0600 UTC) does not adequately account for operational risks, specifically, it submits:

- 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.

3.29 With respect to the proposed changes in capacity in other hours outside 0600 UTC, Aer Lingus states its support. It also supports the intention not to restrict night-time slot allocation to historics only.

3.30 Ryanair states its agreement with the proposed additional runway capacity, and submits that the additional runway capacity is necessary and welcome, aligns with the national aviation policy, and supports the growth and connectivity objectives of Dublin Airport. Ryanair further states that the increased capacity will enhance operational efficiency, reduce delays, and enhance the overall passenger experience.

3.31 Ryanair also supports *'the decision not to take into account the operating restrictions set out in the An Coimisiún Pleanála (ACP) decision dated 16 July 2025, given the existing High Court judicial review proceedings and the European Commission examination of the completeness and validity of the notification by ACP pursuant to Article 8(1) of EU Regulation 598/2014'*.

3.32 SMTW Residents Group submits that, in the context of judicial reviews of ACP's North Runway Relevant Action decision, it is not clear how the High Court actions will progress, and that the IAA should have a "plan B" in place if a decision is made in respect of Condition 5. It references the paragraph 3.26 of the S26 Draft Decision that the first and third conditions of ACP North Runway Relevant Action decision are new operating restrictions which have not been introduced in time for S26, and states that as a result, the existing operating restrictions remain in force and should be complied with.

Final Decision

3.33 We have not been convinced by the submission of Aer Lingus to revert to the S25 runway capacity in the 0600 UTC hour. As noted by To70 in the Coordination Committee meeting of 28 August, while simulation modelling of the S26 Wishlist did present some spikes of taxi-in delay in the 0600z hour, this is similar to the delay observed in later parts of the day. The

increased arrival taxi-in time in the 0600z hour is also largely offset by a decrease in taxi-in times in the shoulder hours around it, relative to maintaining the S25 limits. Overall, the impact is of minor significance and is offset across the day where the average taxi-in time is similar across all scenarios modelled, but generally slightly lower for the S26 Wishlist limits with the North Runway operational under both the 0500z and 0600z scenarios.

3.34 It is also notable that in the model calibration process, which simulated the flight schedule on a recent day of operations, some taxi-in time spikes were observed in the actual data which were not captured by the model in the 0400z and 0500z hours, not the 0600z hour. Further, the simulation model is calibrated to behave using set rules, but the real-life scenario can be different due to tactical decisions.

3.35 With respect to the ACP Relevant Action Decision, we note Aer Lingus' and Ryanair's support of not taking account of the new operating restrictions given the existing High Court judicial review proceedings and the European Commission examination of the completeness and validity of the notification by ACP pursuant to Article 8(1) of EU Regulation 598/2014. SMTW suggests that this means that the existing operating restrictions (and, in particular, the original condition 5) remain in effect. As noted in the Draft Decision, we have previously set out, in detail, the legal and practical difficulties associated with taking account of that condition for the purposes of Article 6 of the Slot Regulation. That would remain the case regardless of the proper interpretation of the timing of when the revocation of the original condition 5 takes effect. Consequently, we continue to take the same approach as for the last number of seasons by retaining the pre-existing single runway R60 coordination parameters in the night hours.

3.36 Accordingly, we confirm our draft decision in respect of the runway parameters, which remains in line with the majority advice of the Coordination Committee.

Parking Stands

3.37 In this section, we discuss the parking stand parameters for S26.

Draft Decision

3.38 We proposed to adopt Dublin Airport's proposal to introduce a trial that would take place in respect of S26 which would replace some of the referrals for aircraft stands. We stated our understanding that, following further discussion with ACL and Dublin Airport, the proposed trial would proceed as follows:

- ACL will construct control stand coordination parameter(s) based on stand capacity criteria provided by Dublin Airport.
- Initial slot allocation will progress as per the existing referral process, following which the outcome will be compared against the test coordination parameter(s).
- The results will be shared within the working group, and the trial parameters will be amended as necessary.
- Further similar reviews will take place at HBD and ahead of the Start of Season.
- Presuming satisfactory performance at that point, the scope of stand referrals would be eliminated (or reduced) within the season.
- Presuming continued satisfactory performance, the scope of stand referrals would be reduced or eliminated entirely from the relevant seasonal capacity declaration as soon as practicable thereafter.

3.39 We noted that the majority vote was in favour of the proposal, albeit with a significant number of abstentions. We noted that we agree with the principle of reducing or eliminating referrals insofar as possible, and also that this should be done in a planned way such that the replacement coordination parameters are properly tested before taking effect. We stated our support of the proposed trial, and proposed to amend the wording of the stand referral parameter within the capacity declaration accordingly.

3.40 We also proposed to update the stand count, as usual, to reflect seasonal changes.

Responses to Draft Decision

3.41 Aer Lingus states that it supports the principle of reducing referrals through structured coordination parameters. However, it emphasises the importance of:

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

3.42 Aer Lingus also welcomes the opportunity to participate in the Dublin Airport proposed stand parameter working group to contribute to the evaluation of the trial.

Final Decision

3.43 We note there were no objections to amend the wording of the stand referral parameter within the capacity declaration to enable the proposed trial to reduce or eliminate stand referrals insofar as possible. We confirm this approach.

4. Terminal Building Coordination Parameters

4.1 We have decided to adopt the uplifted Terminal 1 and Terminal 2 departures rolling hourly Passenger Terminal Buildings (PTB) limits as proposed by Dublin Airport, and to roll forward the Terminal 1 and Terminal 2 arrivals rolling hourly PTB limits from S25. We have also decided to adopt the new US Preclearance hourly passenger processing limit in replacement of the blanket referral parameter. The rolling hourly terminal and US Preclearance limits are set out in Table 4.1.

4.2 We also maintain the load factor assumptions of 95% for scheduled services in Terminal 1, 85% in Terminal 2, and 100% for charter services. We maintain the referral parameters in relation to Terminal 2 check-in desks as per the S25 coordination parameter.

Table 4.1: Hourly Terminal and US Preclearance Limits – S26

	Departures Hourly Limit	Arrivals Hourly Limit	Preclearance Hourly Limit
Terminal 1	4,625	3,960	-
Terminal 2	4,200	3,400	1,450

Source: IAA

Proposed Hourly Limits – Dublin Airport

4.3 Dublin Airport proposed to increase the both the Terminal 1 and Terminal 2 departures PTB hourly limits, based on an assessment of expected available capacity, while rolling forward the respective arrival PTB hourly limits from S25. The expected capacity was assessed by:

- Estimating tray throughput per hour based on current performance of C3 lanes but with the relaxation of liquid and gel (LAGs) divestment requirements;
- Dividing this by current images per passenger (IPP) as per current performance;
- Multiplying the outcome by the number of lanes in the respective terminals; and finally,
- Dividing by an estimate of the percentage of all passengers on a flight that will present at security in 1 hour, based on the current S25 performance.

4.4 Increased tray throughput as a result of the relaxation of LAGs divestment requirements is the primary driver for the increase in expected capacity across both terminals. It was noted that the hourly PTB limits are unlikely to be a materially constraining factor on the allocation of slots in S26, relative to other limits.

4.5 Dublin Airport also proposed the removal of the US Preclearance referral on new flights and schedule changes, to be replaced by a US Preclearance departing passenger standard coordination parameter of 1,450 per hour. This parameter was similarly based on US Preclearance processing capacity, an assessment of the percentage of passengers that will present within one hour, and a load factor of 90%. It was noted that all demand from S25 would fit within this new parameter.

Proposed Referral Limits – Dublin Airport

4.6 Dublin Airport proposed retaining the referral parameter for Terminal 2 check-in desks 1-28, where demand exceeds 28 desks.

Seasonal Terminal Seat Capacity Constraint

4.7 For the W24 season and the S25 season, we put in place a Passenger Air Traffic Movement (PATM) seat capacity coordination parameter to take account of certain planning conditions relating to Terminals 1 and 2 at Dublin Airport. Specifically, Condition 3 of the Terminal 2 planning permission F06A/1248 (PL 06F.220670), from 2007, states that:

'The combined capacity of Terminal 2 as permitted together with Terminal 1 shall not exceed 32 million passengers per annum unless otherwise authorised by a further grant of planning permission.'

4.8 Similarly, Condition 2 of a Terminal 1 extension planning permission (06F.223469 & F06A/1843), from 2008, states that:

'The combined capacity of Terminal 1 (including the extension authorised by this grant of permission) and Terminal 2 granted permission under planning register reference number F06A/1248 (An Bord Pleanála appeal reference number PL 06F.220670) shall not exceed 32 million passengers per annum unless otherwise authorised by further grant of planning permission.'

4.9 We refer to these conditions collectively as the '32mppa Conditions'. As set out in the W24 and S25 decisions, the IAA had no role in the decision to impose the 32mppa Conditions and has no power to amend or revoke them. The role of the IAA is to take account of relevant constraints when determining the seasonal coordination parameters. For the reasons set out in detail in those decisions, the IAA considers the 32mppa Conditions to currently constitute a relevant constraint for the purposes of Article 6 of the Slot Regulation.

4.10 The IAA's conclusion in that regard, and in respect of a number of related points, is disputed by various parties, who have brought a total of six sets of judicial review proceedings in respect of our W24 and S25 decisions.

4.11 On 10 October 2024 we published our Final Decision on S25 which set a seat capacity limit of 25.2 million seats for the Summer 2025 scheduling season. Ryanair, Aer Lingus, and, together, Delta Air Lines, Inc., JetBlue Airways Corporation, United Airlines, Inc., and Air Transport Association of America, Inc. (known as the 'A4A parties') were granted leave on 21 October 2024 to bring their respective proceedings challenging the S25 Decision, in which they also sought a stay on the operation of the seat cap coordination parameter. The IAA adopted a neutral position in respect of the stay application, whereas daa opposed it. On 4 November 2024, the High Court granted the stay, and consequently the seat cap coordination parameter is currently inoperative for S25.

4.12 In December 2024, the High Court then decided to refer three questions to the Court of Justice of the European Union, on the basis that it would not be possible to resolve the W24 and S25 proceedings without a ruling on various questions of interpretation and application in relation to the Slot Regulation. The three questions referred are:

1. Can a national competent authority undertaking the exercise of determining the parameters for slot allocation at a coordinated airport under Article 6(1) of Regulation 95/93 (as amended) take into account development consents granted by the relevant planning authority under the national planning code in respect of that airport which impose conditions providing inter alia that the "combined capacity" of the airport terminals shall not exceed a certain annual limit of passengers, and in respect of which the stated reason for the imposition of the conditions was "Having regard to the policies and objectives of the Dublin Airport Local Area Plan and the capacity constraints (transportation) at the eastern campus"? Are such conditions a "relevant

technical, operational or environmental constraint" within the meaning of Article 6(1)? Do they form part of the objective analysis of the capacity situation at the airport for the purposes of Article 6(1)?

2. If the answer to question 1 is yes, does Article 6(1) of Regulation 95/93, and insofar as relevant Articles 16 and 17 of the Charter of Fundamental Rights of the European Union, permit Member States to make a determination of the parameters for slot allocation at a coordinated airport for a particular scheduling period which results in the non-allocation of some series of slots (or certain components thereof) to which air carriers would otherwise be entitled in accordance with the terms of Article 8(2)?

3. If this arises for consideration strictly as a result of the Court's answers to questions 1 and 2, does the Slot Regulation prohibit Airport Management Bodies within the meaning of the Slot Regulation from taking unilateral action to close the airport for a period of time, for the purpose of preventing the operation of slots which have been allocated by the Airport Coordinator so as to avoid a breach of an annual limit of passengers of the type mentioned in Question 1?

4.13 On 11 February 2025, Ryanair wrote to the parties involved in the W24 and S25 proceedings proposing that, pending the delivery of the CJEU ruling on the questions referred and the determination of the proceedings by the High Court, the IAA should not take account of the 32mppa Conditions in setting coordination parameters. Aer Lingus and the A4A parties agreed with the Ryanair proposal. The IAA adopted a neutral position. daa outlined its opposition to the proposal. The order ultimately sought by the airlines was as follows:

"That the Respondent shall not, pending the determination of these proceedings and the related High Court proceedings bearing Record Numbers 2024/920JR; 2024/927JR; 2024/928JR; 2024/1296JR and 2024/1299JR (the "Proceedings"), take account of Condition 3 of planning permission F06A/1248 (An Bord Pleanála Reg. Ref. PL06F.220670) or Condition 2 of Planning Permission F06A/1843 (An Bord Pleanála Reg. Ref. PL06f.22346) (the "32mppa Conditions"), for the purposes of setting coordination parameters or otherwise in respect of the Respondent's functions performed under Council Regulation (EEC) No 95/93 of 18 January 1993 on common rules for allocation of slots at Community Airports, as amended."

4.14 Following a hearing before the High Court on 28 March 2025, on 2 April 2025 the High Court delivered judgement, finding:

"In the premises, I intend to grant an interlocutory injunction pursuant to Order 84, rule 20(8)(b) of the Rules of the Superior Courts in the terms sought by the airlines. That order will remain in place pending the determination of these proceedings by the High Court. I will provide that the parties will have liberty to apply to amend vary or discharge that order on 72 hours' notice in the event of any material change in circumstances."

4.15 As a result of the High Court's granting of the order in the terms set out above, the IAA did not take account of the 32mppa Conditions in the Draft Decision, and consequently did not propose to include a seasonal seat cap coordination parameter for S26.

Draft Decision on Terminal Coordination Parameters

4.16 We proposed to roll-forward the S25 arrivals PTB hourly limits for both Terminal 1 and Terminal 2. We noted there was no objection or alternative proposal forthcoming from the Coordination Committee. We also proposed to adopt the increased Terminal 1 and Terminal 2 departures hourly limits as proposed by Dublin Airport.

4.17 We noted that the methodology employed by Dublin Airport in proposing this adjustment follows the approach by which the existing S25 parameters have been calculated, with

assumptions updated based on current S25 performance of the new C3 lanes, all of which will be completed by Q4 2025. We further stated the methodology is consistent with how the IAA has previously assessed security processor capacity, being based on passenger throughput per lane modelled as a function of tray throughput and IPP. We also noted there was no objection to the methodology by any member of the Coordination Committee.

4.18 We noted our proposal to adopt the uplifted Terminal 1 PTB departures hourly limits is in line with the majority advice of the Coordination Committee, but our proposal to adopt the uplifted Terminal 2 PTB departures hourly limits is contrary to the majority advice. However, as the same methodology has been used by Dublin Airport to assess the expected available capacity in both Terminals, and we assessed this methodology as satisfactory as outlined above, we saw no substantive justification for adopting the revised Terminal 1 departures hourly limit while rejecting the revised Terminal 2 departures hourly limit.

4.19 We also noted that the result of the vote not to adopt the revised Terminal 2 departures PTB hourly limits was largely impacted by Ryanair's vote in this respect, notwithstanding the fact that Ryanair does not operate from Terminal 2. However, no reasoned substantiation was given for this decision, nor by any other Coordination Committee members who voted against the proposal.

4.20 We also proposed to adopt the US Preclearance hourly passenger processing limit for the S26 season. The justification for this decision was similar to our decision in respect of the revised Terminal 2 departure PTB hourly limits; although most airlines abstained from the vote, the advice not to introduce the CBP hourly passenger processing limit had largely been driven by an airline which will not be impacted by its introduction, with no justification provided for this decision, nor by any other Coordination Committee member which voted against the proposal. We also stated our satisfaction that the proposed parameter had been estimated in a reasonable manner, similarly based on the assessed hourly processing capacity. We noted that all current S25 demand fits within the proposed S26 parameter.

4.21 We proposed to retain the referral parameter for Terminal 2 check-in desks 1-28, where demand exceeds 28 desks.

4.22 We noted that, as outlined above, the IAA is injuncted from taking account of the 32mppa Conditions, whether by imposing a seasonal seat cap coordination parameter or otherwise.

4.23 In summary, we therefore proposed the following with respect to the PTB parameters:

- We proposed to roll the Terminal 1 and Terminal 2 PTB arrivals hourly limits forward from S25, while increasing the Terminal 1 and Terminal 2 hourly departures limits as a result of the increased security capacity described above.
- We proposed to introduce a US Preclearance hourly passenger processing limit in line with the Dublin Airport proposal.
- We proposed to retain the referral parameter for Terminal 2 check-in desks 1-28, where demand exceeds 28 desks.

Responses to Draft Decision

4.24 Aer Lingus states its support for the S26 Draft Decision proposal to uplift the Terminal 2 departures hourly limit. It notes that although the Draft Decision proposal in this respect was contrary to the advice of the Coordination Committee, this 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.

4.25 Aer Lingus also states its support for the proposed hourly coordination parameter for US Preclearance as the first step in removing the current process of referrals. It states that, as the largest user of the US Preclearance facility, it is particularly exposed to the inherent delay built into the current process of referrals, which does not allow for immediate response to request for schedule adjustments during the current season. As a result, it believes, 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 its passengers.

4.26 In its submission, daa provides an overview and timeline to date of the Enforcement Notice served on daa alleging an "exceedance/breach of the 32[mppa] capacity restriction for the years 2023 and 2024", including daa's subsequent filing of judicial review proceedings in respect of the Enforcement Notice. It outlines that the judicial review raises a number of grounds, including issues concerning the inter-relationship between the 32mppa Conditions and the Slot Regulation, the evidence supporting the fact that daa has taken all reasonable steps to comply, and issues concerning the ambiguity of the notice. It states two particularly significant arguments in daa's judicial review of the Enforcement Notice are the timing for compliance, and the interpretation of the passenger count.

4.27 daa notes that it is its position in the current CJEU preliminary reference that the 32mppa Conditions should be reflected in the coordination parameters.

4.28 Ryanair states its agreement with the proposed additional terminal capacity, stating, as with the runway capacity, it is a necessary and welcome development that aligns with the national aviation policy and supports the growth and connectivity objectives of Dublin Airport.

4.29 With respect to the 32mppa Conditions, Ryanair supports '*the decision not to take account of the 32mppa passenger cap in light of the High Court injunction granted on 2 April 2025*'.

4.30 In the context of the High Court injunction, SMTW Residents Group submits that:

- Judge O'Donnell made it clear that the Court proceedings were '*not related to the 32mppa Conditions, but rather the slot regulation process*'.
- Similarly, SMTW Residents Group refers to Justice O'Donnell's judgment of 4 November 2024 whereby he states that the proceedings (those of the S25 Stay on the PATM seat capacity parameter) only apply to the slot regulation process, and do not suspend any planning condition, nor affect the entitlement of the planning authorities to pursue enforcement of the 32mppa Conditions.
- Fingal County Council issued daa with an enforcement notice on 18 June in respect of the 32mppa Conditions. It further submits that daa is carrying out unauthorised development which has been facilitated by the actions of the IAA.
- It is clear that the 32mppa Conditions affect the noise climate around Dublin Airport, and limit access to or reduce the operational capacity of Dublin Airport and, therefore, fall into the category of an Operating Restriction for the purposes of Regulation 598/2014. It also references statements by ANCA in pre-planning meetings with daa, which, it asserts, provides evidence that ANCA deem the 32mppa Conditions to be an Operating Restriction. It submits further that the S26 Draft Decision has serious consequences for this Operating Restriction which have not been factored into the draft proposal. ANCA, it states, has exclusive competency over Operating Restrictions and the IAA, it asserts, has no legal jurisdiction.

4.31 With respect to slot issuance, SMTW Residents Group submits that:

- In the context of the S26 slot coordination process, no new slots should be issued while the High Court stay remains in force. It further asserts that the *'purpose of the stay is to provide*

regulatory and operational clarity during a period of uncertainty – whether related to a pending passenger cap or a draft decision on further regulatory action'. It submits that *'issuing new slots undermines this clarity and risks significant confusion should the passenger cap or draft decision be enforced'*.

- The proposed S26 coordination parameters will allow for an increase of 25 in the total daily limits, which, it asserts, will lead to more slots being acquired by airlines who will claim historic rights to these in the future, which will lead to legal uncertainty if the cap is enforced, or the "Relevant Action draft decision" is upheld.

4.32 SMTW Residents Group also makes a number of submissions on environmental considerations, stating that:

- Article 2(m) of the Slot Regulation states that coordination parameters shall reflect 'all technical, operational and environmental factors that affect the performance of the airport infrastructure and its different sub-systems'.
- Article 6(1) of the Slot Regulation states that at a coordinated airport, Member States shall ensure 'all relevant technical, operational and environmental constraints as well as any changes thereto', are taken into account when determining coordination parameters.
- The S26 Draft Decision does not take the environment into account and that the proposal will result in an increase in emissions, something it asserts the IAA has not factored into the decision making thus far.
- The IAA is obliged, as a Relevant Body under Section 15 of the Climate Action and Low Carbon Development Act 2015 (amended 2021) to perform its duties in a manner consistent with the furtherance of the national climate objective and the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change.
- The IAA has failed to take account of the adverse effects on human health, the environment, noise and air pollution.

Final Decision

4.33 We are not persuaded that any changes are warranted based on the submission of SMTW Residents Group. As stated in the W25 Final Decision:

- The suggestion that no new slots should be issued while the High Court injunction is in force would amount to taking account of the 32mppa Conditions (directly or indirectly), contrary to the Court order.
- Fundamentally, in respect of the asserted environmental considerations, the IAA's role as required by the Slot Regulation is to set coordination parameters which take account of such constraints where they exist – not to generate any such constraints itself.

4.34 With respect to SMTW Residents Group's submission, firstly, we note that various possible approaches were considered in the hearing of the application for this order. Indeed, one of the approaches, proposed by daa, was to limit the Order to historic slots only, which was not accepted by the Court.

4.35 The Court Order as made directs the IAA not to take account of the 32mppa Conditions *'for the purposes of setting coordination parameters or otherwise'* when discharging our duties under the Slot Regulation. It does not direct the IAA to, for example, take account of the 32mppa Conditions by *'freezing'* the runway coordination parameters in the manner which appears to be again suggested by SMTW Resident's Group. We also note more generally that this approach would not be appropriate given the coordination parameters are required to reflect the available capacity of each airport sub-system under the definition of

'coordination parameters' under Article 2(m) of the Slot Regulation.

4.36 Secondly, contrary to the submission of SMTW Residents Group, the IAA's jurisdiction under the Slot Regulation, when setting coordination parameters, is to take account of relevant constraints where they exist and have been imposed through, for example, EU Regulation 598/2014. The IAA's jurisdiction is not to create such constraints itself, whether environmental or otherwise.

4.37 Without prejudice to this, we also note that SMTW Residents Group has not explained why it believes the proposed changes to the runway coordination parameters will cause an 'increase in emissions', whether at Dublin Airport or generally. If the available capacity, as declared by the coordination parameters, is to be constrained at Dublin Airport, airlines will operate in an increasingly constrained airport (potentially at less favourable times), and/or fly more to other airports. They are unlikely to park aircraft and not fly them. Even if it were permissible, it is doubtful that constraining available capacity through the coordination parameters would have any material effect on reducing aviation emissions.

4.38 Finally, with reference to the submission regarding the Climate and Low Carbon Development Act 2015 (as amended), and again without prejudice to the above, we reiterate that the IAA is neither a 'prescribed body' nor a 'public body' as defined in the Freedom of Information Act of 2014.

4.39 We note there was no other objection to the proposed terminal building parameters. We also note that although the uplift to the Terminal 1 and Terminal 2 departures hourly limits was based on the Dublin Airport assessment that tray throughout would increase as a result of the relaxation of LAGs divestment requirements, we would expect the improvement resulting from the LAGs change to materialise more in reduced IPP, than increased tray throughput. Notwithstanding this, the Dublin Airport estimate is overall reasonable for S26 in particular, pending the availability of further data.

4.40 We therefore confirm our draft decision in respect of the terminal building coordination parameters.

5. Appendix: Summer 2026 Coordination Parameters

The Irish Aviation Authority has determined the following scheduling limits for the Summer 2026 season at Dublin Airport.

Runway Scheduling Parameters:

Runway Hourly Limits			
Time UTC	Arrival Limit	Departure Limit	Total Limit
0000	23	25	32
0100	23	25	32
0200	23	25	32
0300	23	25	32
0400	23	25	32
0500	23	36	40
0600	22	40	54
0700	28	25	48
0800	29	26	50
0900	27	30	54
1000	30	27	54
1100	30	30	57
1200	28	30	57
1300	28	30	56
1400	23	32	52
1500	26	27	47
1600	28	29	54
1700	26	30	55
1800	23	26	48
1900	26	23	46
2000	27	22	46
2100	34	25	45
2200	28	25	32
2300	23	25	32
Totals	624	663	1087

Maximum number of movements per 10-minute period (0600-2159)	
Maximum Total	13
Maximum Arrivals	6
Maximum Departures	7

Maximum number of movements per 10-minute period (2200z – 0559z)	
Maximum Total	9
Maximum Arrivals	6
Maximum Departures	6*
*Exception: Maximum Departure Limit is 7 movements at 0500, 0510, 0520, 0530, 0540, 0550 UTC	

Passenger Terminal Parameters (hourly):

	Departures Hourly Limit	Arrivals Hourly Limit	US Preclearance Processing Hourly Limit
Terminal 1	4,625	3,960	-
Terminal 2	4,200	3,400	1,450

Notes:

4. The hourly limit for passengers is rolled every 10-minutes.
5. Load factors of 95% are applied to Scheduled services for Terminal 1.
6. Load factors of 85% are applied to Scheduled services for Terminal 2.
7. Load factors of 90% are applied to Scheduled services for CBP.
8. Load factors of 100% are applied for Chartered services for both Terminal 1 and Terminal 2.

Stand Parameters:

	GA	**Non-Turnaround**		**Turnaround Stands**									**All**
	W.A.N	W.A.S	Total	5G	5H	Triangle	MRO	P1	P2	P3	P4	S.A	Total
Remote	8	16	24	15	12	4	6	3	-	-	-	-	64
Contact	-	-	-	-	-	-	-	23	9	11	19	9	71
All	8	16	24	15	12	4	6	26	9	11	19	9	135

Note: The table represents NBE stand capacity

Area	**Constraint**
Stands	Where demand for stands exceeds supply based on coordination allocation, flights to be referred to Dublin Airport for detailed assessment insofar as necessary pending the progress of the trial to reduce the scope of such referrals.

Referral Parameters:

Area	**Flag**
T2 Check-in Desks 1-28 (T2 Operators excluding EI)	Demand exceeding 28 desks