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The National Business Aviation Association (NBAA), which represents the interests of 10,000 members who own, operate, and maintain business aircraft, including those companies who conduct international flight operations in support of company travel needs, welcomes the April Draft Decision on Winter 2024 Coordination Parameters at Dublin Airport.

NBAA especially supports the pragmatic approach described in Section 4.14, which states:
> *Operations not using the passenger capacity of Terminal 1 or Terminal 2 would not be limited by the PATM seat cap. Most notably for the W24 season, this means that cargo and General Aviation (GA) operations would not be limited by it, in the latter case because they enter via gateposts or the Platinum Services terminal, rather than terminals 1 or 2. In the case of GA, this will be kept under review for future seasons pending the outcome of the disagreement over the meaning and effect of the 32mppa Conditions. We note that, in any event, the question is of limited materiality in the context of the volume of GA passengers, of which there were less than 18,000 in 2023.*

Under this provision, general aviation operations, which do not utilize Terminal 1 or Terminal 2, would not be limited by the PATM [passenger air transport movements] seat cap. This allows general aviation operations, including business aircraft operations, to continue providing important economic benefits to Dublin and the surrounding region. While the number of general aviation passengers is not voluminous, the importance to the Irish and specifically the Dublin economy is significant, contributing over 2,000 jobs and nearly €1 billion to the economy.

NBAA appreciates the opportunity to provide consultation on this draft decision and looks forward to the final report.

Sincerely,

Douglas Carr
SVP, Safety, Security, Sustainability & International Affairs
National Business Aviation Association

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