

17 April 2025

Irish Aviation Authority
The Times Building
11-12 D'Olier St
Dublin 2
Email: consultation@iaa.ie

By email

Re: W25 Draft Decision on Coordination Parameters

Dear Sir/Madam,

We refer to the above IAA draft decision dated 10 April 2025 on the Winter 2025 coordination parameters at Dublin Airport (the “**Draft Decision**”). We are writing to express our agreement with the main elements of the Draft Decision, namely (i) proposed additional runway capacity and (ii) the decision to not impose a seat cap in light of the recent High Court ruling of 2 April 2025 in the various judicial review proceedings brought by Ryanair, Aer Lingus, and Airlines For America seeking an extension of the stay already secured for Summer 2025 on the IAA applying a PATM seat cap as a coordination parameter.

The additional runway capacity proposed in the Draft Decision is a necessary and welcome development. It aligns with the national aviation policy and supports the growth and connectivity objectives of Dublin Airport. The increased capacity will enhance operational efficiency, reduce delays, and improve the overall passenger experience. We consider this development as crucial for maintaining Dublin Airport's status as a key gateway to Ireland and for supporting the island economy.

The Draft Decision clearly had to align with the High Court ruling of 2 April. We note that the High Court acknowledged the significant negative effects of the seat cap on airlines, including but not limited to the loss of historic slots, reduced revenue, and broader economic implications for the aviation sector as a whole.

In conclusion, we fully support the Draft Decision, and we urge the IAA to adopt these measures in the final decision.

Yours sincerely,



Eoin Kealy
Director of Regulatory & Competition