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RE:

2026 Determination on Airport Charges at Dublin Airport - Issues Paper

Dear Adrian.

I refer to the ongoing 2026 Determination for setting future airport charges at Dublin Airport and the IAA's Issues Paper of 29 July. The forthcoming Determination offers the IAA the opportunity to put in place the conditions to allow traffic and connectivity to grow once again at Dublin. In recent years, Dublin Airport and the wider Irish economy has lost out on substantial investments from airlines due to a series of poor decisions and inaction which have negatively impacted traffic growth, reduced connectivity and poorly reflected on the openness and competitiveness of Ireland as an investment location.

When air travel restarted, airlines and their passengers suffered from the daa's lack of preparedness, most evident in three-hour security queues. Despite these failures by daa's management, the IAA rewarded Dublin Airport with the permission to hike charges by up to +45% over 4 years. Both Fingal County Council and the previous government allowed for Dublin Airport to be the only airport in Europe with an arbitrary passenger cap based on outdated road traffic planning concern, a concern which we can now see was entirely unfounded. Finally, An Coimisiún Pleanála are now attempting to impose a secondary arbitrary night-time movement cap at the Airport. These decisions by various public authorities have negatively impacted Irish traffic, connectivity, tourism, and employment in recent years, with airlines choosing to grow in more competitive locations who are eager to secure traffic, connectivity, and investment for their regions and countries.

There are two simple requirements to grow traffic in Dublin:

- 1. competitive airport charges which fund efficient (and necessary) infrastructure; and,
- 2. the absence of arbitrary and artificial passenger/movement restrictions on that infrastructure.

It would be unacceptable for daa to squander this opportunity by hiking charges to uncompetitive levels to fund wasteful investment, such as a four-lane tunnel under a disused runway. It is therefore imperative that the IAA fulfils its statutory objective by lowering charges to protect the interests of the public by facilitating the efficient development and operation of Dublin Airport, which will allow for growth in traffic, competition, and connectivity.

I attach overleaf Ryanair's response to the questions raised in the IAA's Issues Paper of 29 July. The IAA's Issue Paper confirms that the Price Caps at Dublin Airport were +18% and +14% higher than necessary in 2023 and 2024 respectively. This finding confirms airport charges at Dublin are too high as advised in our response to the previous Draft Determination – which proposed even higher Price Caps. The forthcoming Determination must reduce excessive Dublin airport charges by cutting wasteful OpEx and CapEx allowances granted to daa.

We would welcome the opportunity to meet with you to discuss the contents of this letter further.

Yours sincerely

Ray Kelliher

Director - Airports & Commercial Finance