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Dr. Adrian Corcoran
Director of Economic Regulation, Licensing and Consumer Affairs
Irish Aviation Authority (IAA)
11-12 D'Olier Street
Dublin 2
Ireland

By Email: consultation@iaa.ie
RE: Response to consultation on the timeline for the 2026 Determination

Dear Adrian,

I refer to the IAA's proposed timeline for setting the 2027-31 Price Cap at Dublin Airport.

Ryanair welcomes the IAA's willingness to consult with stakeholders on the proposed timeline for setting the future Price Cap at Dublin Airport. Given daa's Significant Market Power and the information asymmetry it holds vis-à-vis airport users, there must be sufficient time for airport users to analyse the materials and proposals provided by daa and the IAA. There must also be ample time for the IAA to incorporate the airport users' feedback into the Draft and Final Decisions. The proposed Determination timeline is sufficient to allow this.

However, Ryanair is concerned that the proposed publication of the Final Decision in November 2026 is too late, as the buffer to account for any delays in the process is too small, in addition to providing little time for daa to consult with airport users on the airport charges in force from the beginning of the IATA Summer 27 season. While there may now be less uncertainty than during the 2022-26 Price Cap Determination, there remains a possibility of factors emerging during this Determination process which may cause delays. For example, developments on the 32mppa cap at Dublin Airport during the period, such as a CJEU and/or subsequent High Court ruling, or Fingal County Council/An Bord Pleanála decision(s) on daa's planning application(s), may result in a need to revise traffic forecasts, OpEx forecasts and/or CapEx plans. It would be appropriate to speed up the timeline for the Draft and Final Determinations (and proceed on the basis of the 32mppa cap having no impact on the building blocks) with the appropriate provisos for dealing with these developments before the Price Cap period starts in 2027.

If the Final Decision is delayed beyond November 2026, we foresee two potential issues which may arise, both of which are harmful to airport users.

Firstly, the annual airport charge consultation process would be reduced beyond the EU-wide requirement for four months' notice in advance of charges which will come into force at the beginning of S27. While the annual consultation is separate from the process of setting the Price Cap, the two processes are closely linked, as the Price Cap will determine the airport charges for a given year. The IAA should seek to avoid the possibility of a shortened consultation now, rather than rely on an exceptional circumstances justification in the event the four months' notice period for amending charges needs to be reduced.

Secondly, most airport users will finalise their schedules and put the majority of their capacity for the S27 season on sale well in advance of November 2026. If, for example, the Final Decision slips until December and the airport charge proposal follows in January, airport users' ability to respond to the new charges and adjust capacity accordingly will be limited. Airport charges represent a significant portion of airport users' operating costs and any uncertainty and/or late changes may lead to a suboptimal schedule. The Final Decision

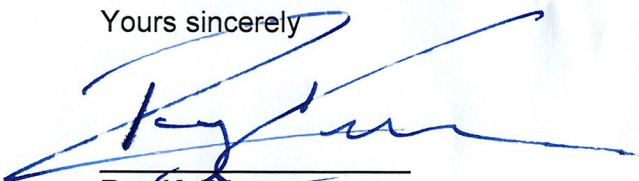
must therefore be delivered with sufficient time to allow daa to hold a meaningful consultation on revised charges to be finalised well in advance of the S27 season.

In fact, it was thanks to the IAA's comprehensive decision upholding Ryanair's complaint against Dublin Airport's discriminatory 2024 airport charges which reduced airport charges for S25 and allowed Ryanair to change our capacity allocation for the S25 summer season. However, our response to the charge reduction was somewhat limited by the timing of the charge decision in late December, meaning while Ryanair was able to reallocate fourteen more environmentally friendly Boeing 737 8-200 aircraft to Dublin, we could only launch one new route for S25. Should the 2027-31 Price Cap and subsequent airport charges decision ensure more competitive airport charges from S27, Ryanair needs an earlier Final Decision in order to allocate more capacity, new routes and more environmentally friendly aircraft to Dublin – which the Irish economy needs at this time of uncertainty.

To ensure there is ample time for analysis of the proposals, while ensuring there is a sufficient buffer in place to avoid delays in publishing revised airport charges, Ryanair proposes that the deadlines for the Draft and Final Decisions are advanced to the end of May and end of September respectively.

We are available to discuss the contents of this letter further.

Yours sincerely



Ray Kelliner
Director – Airports & Commercial Finance
Ryanair