

StageGate Concluding Report Q2 2026

- 1.1 This report concludes the first iteration of the StageGate process for 2026. This cycle focused on the StageGate 1 assessment of **(i) The Fuel Hydrant Network** CIP 20.03.075.

StageGate Process

- 1.2 The 2019 Determination on the maximum level of Airport Charges at Dublin Airport introduced a new process for certain large scale capex projects, known as StageGate. Initially, 17 projects were identified for inclusion in the process. This was increased to 27 projects in the Interim Review of the 2019 Determination in relation to 2023-2026 ("2022 Review Decision").¹
- 1.3 StageGate is a rolling iterative process intended to add flexibility for the scope and/or cost of the StageGate projects, to develop over the regulatory period. A key component of the process is the Independent Fund Surveyor (IFS) which provides independent expert views on any such developments to inform airport users and the Irish Aviation Authority (IAA). The IAA has appointed Steer as the IFS.
- 1.4 The 2019 determination (and subsequently the Interim Review of the 2019 determination in relation to 2023-2026) provided initial allowances for each of the StageGate projects; these are termed the StageGate 0 allowances. When a project has reached a sufficiently detailed level of design and is ready to be progressed, the project is advanced to StageGate 1. At this stage Dublin Airport provides an up-to-date costing, together with supporting detail, to the IFS for assessment. The IFS then assesses the Dublin Airport proposal, and if it considers the project to be reasonably costed and effectively scoped, it will agree with the proposal.
- 1.5 There are two factors which drive the decision on the StageGate 1 allowance: the IFS conclusions on technical scope/cost efficiency, and the views of airport users.
- 1.6 Following the completion of the StageGate 1 phase, the project enters StageGate 2. This phase allows for ongoing consultation as the project is being delivered. Any stakeholder may submit material for IFS consideration during this phase, which the IFS will report on in the subsequent iteration of the process. In the absence of any further developments being highlighted to the IAA and the IFS, no further assessment will be conducted.
- 1.7 The outcome of the StageGate process drives the final level of remuneration for the project over its asset life. When reconciling actual expenditure against the allowance in the subsequent determination, the IAA's starting point will be the StageGate 1 allowance. The IAA will also consider any developments which may have occurred and been consulted on during the StageGate 2 phase.

2026- Q2 First Iteration

- 1.8 One project was included for StageGate 1 assessment in the first StageGate cycle in 2026:
- Fuel Hydrant Network Works
- 1.9 The final IFS report on these projects was circulated on the **30th of June 2026**. A

¹ https://www.iaa.ie/docs/default-source/car-documents/1c-economic-regulation/final-decision-on-the-maximum-levels-of-airport-charges-at-dublin-airport-2023-2026.pdf?sfvrsn=6b8110f3_1

videoconference was then held on the **13th of July 2026** with presentations from the IFS and Dublin Airport.

- 1.10 As per the StageGate process, airport users were invited to provide written submissions, which should include an indication of whether it objected to or supported the proposed project as per the IFS recommendation.

StageGate 1

The Fuel Hydrant Network

- 1.11 Dublin Airport estimated a StageGate 1 cost of €38.15m for this project.
- 1.12 The IFS detailed its main findings at the StageGate 1 phase. These are detailed as follows:
- The IFS assesses that the project, as submitted by Dublin Airport, will meet the required outputs/outcomes which includes the installation of spurs to Pier 2 and the West Apron, fuel hydrant points at Pier 2 and Pier 3 stands and reinstatement of pavement where required due to hydrant works.
 - The IFS has concerns over the efficiency of the proposed project scope. It assesses that Dublin Airport has provided insufficient evidence that an assessment of the use of directional drilling has been conducted. The IFS believes that if appropriately deployed, directional drilling could save costs associated with pavement reinstatement, exposure of existing services and operational disruption.
 - The IFS considers certain provisions within Dublin Airport's cost estimate to be excessive and has adjusted them to a more appropriate level within its assessment. Such items include the valve chambers for the Pier 2 Spur and Pier and filling with imported material on Pier 2 Stands. The reductions have consequential impacts on other percentage allowances such as main contractor preliminaries, design risk, client contingency and inflation. In total, the IFS' estimation of an efficient cost for this project is approximately €4.36m less than that proposed by Dublin Airport.
- 1.13 The IFS proposed an alternative allowance of €33.79m which is its estimate of the efficient cost of delivering this project.

Stakeholder Views

- 1.14 Aer Lingus recognises the operational and environmental benefits associated with expanding hydrant fuelling infrastructure and also acknowledges the operational efficiency of delivering the fuel hydrant infrastructure alongside major projects such as the Critical Taxiways South programme and West Apron Vehicle Underpass project.
- 1.15 Aer Lingus is concerned about the long-term suitability of the proposed hydrant locations noting that fuel hydrant infrastructure is a long-life asset which Dublin Airport may not ultimately realise the benefits from given the uncertainty of future airport development plans which may alter aircraft stand layouts, fleet requirements and operational demand over time. Aer Lingus believes that further evidence should be provided demonstrating that the proposed hydrant locations remain appropriate under future pier and apron development scenarios and ensuring that the proposed investment delivers sustained utilisation throughout its economic life.
- 1.16 Aer Lingus is concerned that several project elements continue to rely on lump sum estimates for which detailed supporting cost information was not available and states that greater transparency should be provided as the project progresses. Aer Lingus welcomes Dublin

Airport's statement that it intends to progress the project within the IFS allowance and only seek deviations through StageGate 2 when supported by evidence. Aer Lingus asks that the IAA adopt the IFS efficient cost assessment as the baseline allowance for the project and to maintain close StageGate 2 oversight to ensure that any future cost increases are fully evidenced and efficiently incurred.

- 1.17 IATA asks whether the location of the fuelling pits is compatible with any potential changes to the airfield including the future layout of piers 2 and 3 and the possible decommissioning of Runway 16/34. IATA questions whether there should be an assessment of the prioritization of these assets if they cannot be used to their full potential due to potential future developments. IATA is supportive of the cost adjustments proposed by the IFS and encourages Dublin Airport to investigate the efficiency of using directional drilling as proposed by IFS.
- 1.18 Dublin Airport acknowledges the IFS assessment and states that it will progress the project accordingly within the proposed allowance. It states that its cost estimate has been developed using tendered contract values where available, validated Exolum budget quotations, and benchmarking against recently delivered fuel infrastructure works. In response to the IFS' comments regarding scope efficiency, Dublin Airport notes that as the majority of the fuel line passes through areas of pavement that will be reprofiled/rehabilitated anyway in coordination with the West Apron Underpass and Critical Taxiways South projects, open cut rather than directional drilling is the most reasonable approach as it avoids the additional cost and complexity of employing directional drilling where the pavement must already be opened and reinstated.
- 1.19 Ryanair welcomes the IFS challenging the efficiency and costs of the Fuel Hydrant project. It states that it cannot accept Dublin Airport opting for large areas of concrete apron reinstatement instead of directional drilling, without explaining why areas of pavement need to be reprofiled. Ryanair rejects Dublin Airport's proposed increase in costs for the Fuel Hydrant project and requests only the lower IFS estimated amount enter the RAB. It states that any overspend must be funded by Dublin Airport.

Conclusions

The Fuel Hydrant Network

- 1.20 This project is being funded from CIP.20.03.075 Fuel Hydrant Network Works. It will have a StageGate 1 allowance which is €4.36m below the Dublin Airport submission.
- 1.21 Acknowledging IATA's comments about directional drilling, Dublin Airport notes this method has been used effectively on previous projects at the airport and will continue to be considered and deployed where ground or site conditions require it, or where an assessment demonstrates that it represents the most cost-effective and efficient solution. Dublin Airport states that if the Fuel Hydrant Network works were being delivered as a standalone project, without associated pavement or infrastructure works, directional drilling would be considered alongside the other available methodologies. It will continue to review and challenge the current proposed approach throughout the design and delivery stages to ensure that the most appropriate methodology is selected for each location.
- 1.22 In response to Aer Lingus and IATA's concerns regarding the economic life of the proposed fuel hydrant infrastructure, in the context of potential changes to the airfield in particular the future layout of Piers 2 and 3, Dublin Airport notes that no final decision has been made on the decommissioning of Runway 16/34 and it is therefore maintaining two masterplan scenarios:

1. The decommissioning Runway 16/34, allowing Piers 2 and 3 to be replaced and extended
 2. Retaining Runway 16/34, with the piers replaced broadly within their existing footprints
- 1.23 Dublin Airport accepts that while maintaining two separate scenarios inevitably creates some uncertainty regarding the future layout of the airfield, it is aiming to minimise the installation of infrastructure that may subsequently require alteration or relocation where operationally possible. Dublin Airport expects that the proposed Pier 3 infrastructure will align with both masterplan scenarios and is expected to remain operational for the entirety of its proposed asset life. For Pier 2 on the other hand, Dublin Airport states that while the fuel pits proposed in this application are necessary to support the near-term operation of Pier 2, this is not their final intended location following the full replacement and realignment of the pier. Although the stand-specific hydrant pits will eventually become redundant and will need to be relocated to serve the future aircraft positions, the principal feeder pipes, valves and wider fuel-system infrastructure will remain in use and can be extended and incorporated into the future Pier 2 development.
- 1.24 Dublin Airport asserts that delaying the investment in infrastructure at Pier 2 until its full replacement would deny airlines of the safety and operational benefits of the proposed fuel hydrant infrastructure for approximately 15 years and prolong reliance on tanker-based fuelling throughout that period.
- 1.25 No airport user has objected to this project. As per the StageGate 1 rules, the StageGate 1 allowance is in line with the IFS assessment of €33.79m. Dublin Airport agrees to progress the project in line with this allowance and will seek any deviations supported by evidence through the StageGate 2 process.

Summary

- 1.26 In Table 1 below, the column 'StageGate0 CIP' refers to the StageGate 0 allowance for the overall CIP code. In circumstances where the CIP code is divided into sub-elements and a sub-element or group of elements have been submitted in separate StageGate 1 submissions where possible we present the StageGate 0 allowance relating to the specific submission in the column 'StageGate 0 current'. The StageGate 0 allowance for a project may be set at a time when the individual specifications of the project are at an early stage of development. As a result, it is not always straightforward to estimate a specific StageGate 0 allowance for each sub element of the overall CIP project.
- 1.27 Column 'IFS current recommendation' and 'StageGate 1 current allowance' refer to the IFS recommendation on the StageGate 1 submission as presented.

Table 1: StageGate 0 and StageGate 1 allowances in nominal prices

CIP Code	Project	StageGate 0 CIP	StageGate 0 current	IFS current recommendation	StageGate 1 current allowance
CIP.20.03.075	Fuel Hydrant Network	€30.8m	€30.8m	€33.79m	€33.79m

- 1.28 The above project is now considered to be at the StageGate 2 phase. Any further developments which are identified during the StageGate 2 phase will also be considered at the time of the next determination.