

FAO: Adrian Corcoran – Irish Aviation Authority

CONFIDENTIAL

Thank you for the opportunity to respond to the IAA consultation regarding the draft decision on Winter 2024 Coordination Parameters at Dublin Airport.

Please be advised that British Airways fully supports the response submitted by Aer Lingus concerning this consultation.

British Airways had read with the letter submitted by Aer Lingus and agrees with the following key points.

- The IAA is not responsible for controlling passenger throughput and it has no jurisdiction to attempt to limit passenger throughput by the proposed PATM seat cap.
- The Planning Conditions should not be treated as a relevant constraint under the provisions of the Slot Regulation. The IAA has not previously taken into the Planning Conditions into account, nor has it explained why it is doing so now. Most recently the IAA ignored the Planning Conditions when determining the capacity for summer 24.
- The approach proposed by the IAA would result in two separate caps being imposed for the winter 24/25 and the summer 25 seasons respectively. There is no basis for such seasonal caps in the Planning Conditions.
- The IAA has erred in its interpretation of the Planning Conditions in the Draft W24 Decision. The Planning Conditions are ambiguous and should not be considered in the winter 24/25 capacity determination until their precise meaning and effect has been clarified.
- The IAA has not provided sufficient advance notice be given before introducing such restrictions. We note that in a comparable case of the introduction of noise related operating restrictions then such notice is anticipated in the Article 8(1) of Regulation (EU) No. 598/2014* at European Union airports.

**For your reference Article 8(1) of Regulation 598 provides that: "Before introducing an operating restriction, the competent authorities shall give to the Member States, the Commission and the relevant interested parties six months' notice, ending at least two months prior to the determination of the slot coordination parameters as defined in point (m) of Article 2 of Council Regulation (EEC) No 95/93 for the airport concerned for the relevant scheduling period".*

We would be grateful if you could confirm receipt, please.

Kind regards,

Chris Carter
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Networks & Alliances