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The Times Building,
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24th April 2024

Ref: Draft Decision on Winter 2024 Coordination Parameters at Dublin Airport (the 'Draft W24 Decision')

Dear Adrian,

International Airlines Group (IAG) appreciates the opportunity to submit feedback and fully supports Aer Lingus' submission concerning the IAA's approach to the Planning Conditions outlined in the Draft W24 Decision.

IAG oppose IAA's interpretation that the Planning Conditions must be factored into the Winter 2024 season's airport capacity decisions. Furthermore, should these conditions be considered relevant, IAG, alongside Aer Lingus, contest the IAA's plan to integrate these conditions into the decision-making framework. Our primary concerns include:

- 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.

Given these issues, IAG advocates that the Final Winter 24 Decision should not recognize the Planning Conditions as a pertinent constraint and should avoid implementing a PATM.

IAG remains open to further discussions with the IAA to elaborate on these points in greater detail.

Yours sincerely,



Aoivean Brennan
SVP Airport Affairs – Americas and Ireland
International Airlines Group