

## Irish Air Line Pilots' Association

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Representing pilots since 1946

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## Ref: Response to Draft Decision on Interim Review of the 2019 Determination.

- 1. Given the impact of COVID 19 IALPA is in agreement with the decision of CAR that a full review of the 2019 Determination is required.
- 2. IALPA wishes to express serious concern in relation to the service road which crosses runway 16/34. There are no International (ICAO) or European Aviation (EASA) legislation which permits a service road to cross an operational runway. It is not clear that this crossing has been approved by SRD.
- 3. When the Northern Runway is operational, the underpass must be considered a regulatory and Safety requirement. IALPA fully supports the DAA to progress this priority infrastructure ahead of any other CIP Capex project.
- 4. As CAR will shortly combine with SRD we again wish to highlight our concerns in relation to two PACE projects that have received FCC "exempt development". namely the "Critical Taxiway Review" and "South Apron Widening". It is important that the review of these projects by SRD be communicated to all stakeholders.
- 5. We look forward to proactively and positively participating in the CAR review of the 2019 Determination.

Yours sincerely,

Capt. John Goss

Director Safety & Technical

FCC Planning refs: "Critical Taxiway Review" FS5/017/19 approved on 2/8/19

"South Apron Widening" FS5/024/20 approved on 8/3/21