



ÚDARÁS FITÍGHEATA NA hÉIRÉANN
IRISH AVIATION AUTHORITY

Final Decision on Winter 2026 Coordination Parameters at Dublin Airport

30 April 2026



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1. Executive Summary

- 1.1 The IAA is responsible for declaring coordination parameters at coordinated Irish airports. In this paper we set out our Final Decision on the Dublin Airport parameters for the Winter 2026 ('W26') season, which runs from 25 October 2026 to 27 March 2027 inclusive.¹ The coordination parameters are laid out in Appendix 1.
- 1.2 The Coordination Committee, comprising Dublin Airport², AirNav Ireland (the Air Navigation Service Provider), and airlines operating at Dublin Airport, is required under Article 5 of the Slot Regulation (defined in the next section) to provide advice to the IAA on the coordination parameters to be declared in accordance with Article 6. The majority advice is to implement the 'W26 Wishlist' hourly runway capacity ('R60') limits, which involves a range of increases in the declared limits in the day hours.
- 1.3 We have decided to align with the advice of the Coordination Committee through implementing the 'Wishlist' hourly runway capacity ('R60') limits, which involves a range of increases in the declared runway limits in the day hours, adds 14 departure, 16 arrivals, and increases the total limits by 32 per day. In respect of the parking stand coordination parameters, we amend the wording of the referral parameter to reflect the trial to reduce the scope of stand referrals which began in the Summer 2026 season.
- 1.4 With respect to the terminal parameters, we increase the departures hourly limits for both Terminal 1 and Terminal 2. Similar to S26, we also introduce an hourly passenger US Preclearance processing limit in place of the previous referral parameter, in line with the Dublin Airport proposal. This parameter replaces the Winter 2025 US Preclearance referral parameter on new flights and schedule changes. All other coordination parameters are unchanged relative to Winter 2025.
- 1.5 Following an application to the High Court by Ryanair, and a hearing on 28 March 2025, on 3 April 2025 (with the Order amended on 15 July 2025) the High Court ordered the IAA not to take account of the 32mppa Conditions, pending the outcome of underlying judicial reviews of our Winter 2024 and Summer 2025 decisions. We do not include a seasonal PATM seat capacity limit for the W26 season.
- 1.6 We have relied on a range of evidence, and considered the advice provided by the Coordination Committee, and then the responses which we received to the Draft Decision. We commissioned fast-time simulation modelling of the airfield to assess a range of scenarios relating to potential increases in the runway limits.
- 1.7 We have considered other evidence with which we have been presented, or which we sought. This evidence includes modelling work conducted by Dublin Airport, and its consultants.

¹ As per the worldwide slot calendar: [WASG Calendar](#)

² We use the term 'Dublin Airport' to refer to the regulated entity within daa plc.

2. Background

2.1 Section 8(1) of the Aviation Regulation Act, 2001, as amended, provides that the IAA is the competent authority in Ireland for the purposes of Council Regulation (EEC) No. 95/93, as amended (the 'Slot Regulation'). The IAA is therefore responsible for:

- The designation of the Coordination status of Irish airports.
- Appointing a qualified schedules facilitator or coordinator, as appropriate, at airports which have been designated as Schedules Facilitated or Coordinated.
- The determination of coordination parameters at Coordinated airports in line with Article 6 of the Slot Regulation, taking account of relevant technical, operational and environmental constraints as well as any changes thereto.
- Deciding whether to approve Local Guidelines proposed by the Coordination Committee.

2.2 Dublin Airport is designated as Coordinated by the IAA. Airport Coordination Limited (ACL) is the appointed coordinator.

2.3 Under Article 5 of the Slot Regulation, one of the roles of the Coordination Committee is to advise the IAA on the coordination parameters to be determined in accordance with Article 6. The IAA attends Coordination Committee meetings as an observer.

2.4 Article 6(1) states that the determination of the parameters *'shall be based on an objective analysis of the possibilities of accommodating the air traffic, taking into account the different types of traffic at the airport, the airspace congestion likely to occur during the coordination period and the capacity situation'*. Thus, the determination of the parameters is a forward-looking projection in which we must take account of expected demand, capacity (including airspace capacity), and relevant constraining factors, during the relevant season, in an objective manner. This is primarily assessed through simulations of the operation of a forecast S26 flight schedule at the airport.

2.5 Article 6(3) of the Slot Regulation details the required interaction between the IAA and the Coordination Committee:

'The determination of the parameters and the methodology used as well as any changes thereto shall be discussed in detail within the coordination committee with a view to increasing the capacity and number of slots available for allocation, before a final decision on the parameters for slot allocation is taken. All relevant documents shall be made available on request to interested parties.'

2.6 In that regard, as per previous seasons, when taking account of relevant constraints in issuing a capacity declaration, we tend towards a maximal rather than minimal approach as regards declaring the airport capacity parameters. This is because of the requirement that discussion within the coordination committee is *'with a view to increasing the capacity and number of slots available for allocation'*. This framing of the determination of the parameters is given further weight where a parameter is expected to have a constraining effect on demand, given that Article 6(1) requires the determination to be based on the *'possibilities of accommodating the air traffic'*.

Coordination Committee engagement process

2.7 To help inform the decision on the parameters, we engaged To70 to carry out simulations of the expected flight schedule for W26, using the Fast Time Simulation model of the apron,

airfield, and terminal airspace. This model was originally developed for us in 2017 and has been updated regularly to include changes to infrastructure and operational procedures. It has been used for various simulation exercises since, including the determination of the coordination parameters.

- 2.8 Prior to running the simulations, To70 re-validated the model. This involves simulating the flight schedule on a recent day of operations and comparing the simulated airfield metrics (such as taxi time durations and runway throughput) with actual observed metrics on the same day. If necessary, adjustments are made to the model, and the process is repeated until a satisfactory result is obtained whereby the model is replicating the actual operation with a sufficient degree of accuracy.
- 2.9 Airlines were asked to submit plans for Winter 2026 to ACL. Analysis carried out by ACL indicated that increases in the runway limits would be required to ensure that these plans could be fully facilitated. A number of changes to the hourly runway (R60) limits relative to W25 were proposed by Dublin Airport, informed by the analysis carried out by ACL.³

Table 2.1: Dublin Airport Wishlist Proposal for Winter 2026

UTC Hour*	Arrival	Departure	Totals
0700		+4	+4
0800	+3		+3
0900	+3		+3
1000		+3	+3
1100	+2		+2
1200		+1	+4
1300			+2
1400	+2		+2
1600		+3	+3
1700	+3		+3
1800		+3	+3
2100	+3		
Total	+16	+14	+32

Source: Coordination Committee

- 2.10 Information provided by airlines was used to develop an anticipated flight schedule on a busy day in Winter 2026, the “W26 Schedule”. The operation of the W26 Schedule was simulated by To70. To assess the effect of a potential decision to adjust the R60 parameters as proposed above, To70 coordinated the W26 Schedule according to both the W26 Wishlist limits, and alternatively the current W25 runway limits. Comparisons were provided between simulated taxi times, ground delay and runway holding delay. Further details and results of this analysis is set out in Section 3, and the results of the To70 simulations are published alongside this document.

³ All references to times or hours are in UTC 24-hour format, unless stated otherwise. Where a reference is made to a particular hour, such as the 0500z hour, this refers to the time period one hour in length commencing from the stated time. To give an example, the 0500z hour spans from 5 am to 6 am UTC. In each hour, a requested departure slot must not bust the hourly Departures limit or the hourly Total limit, while a requested arrival slot must also not bust the hourly Arrival limit or the hourly Total limit.

- 2.11 In relation to the passenger terminal (PTB) parameters, Dublin Airport proposed to increase the Terminal 1 and Terminal 2 departures hourly limits to 4,325 and 3,850 respectively, up from 3,700 in W25. No change was proposed in respect of the arrival hourly limits. It was noted that the full complement of EDS C3 cabin baggage screening equipment in both terminals was completed in 2025 and it was appropriate to revise the departure hourly limits to take account of the associated increased throughput capacity. It was stated that under the revised departure hourly limits, and the W25 hourly arrival limits, the forecast demand can be accommodated, i.e. the PTB limits are not expected to be a materially constraining factor on the allocation of slots.
- 2.12 With respect to referral parameters, consistent with the approach from S26, Dublin Airport proposed the removal of the US Preclearance referral, to be replaced with a new passenger processing hourly limit coordination parameter of 1,450. It was noted that all W26 Wishlist demand fits within the proposed hourly processing limit, with just the 1100 and 1200 hours (UTC) coming close to the hourly limit.
- 2.13 No other changes were proposed relative to the Winter 2025 limits, except updating the stand count by apron area to reflect expected changes in the count relative to Winter 2025.
- 2.14 Ahead of the pre-meeting of the Coordination Committee, on 19 February Dublin Airport provided an update to the Coordination Committee on planning conditions at the airport, namely the An Coimisiún Pleanála ('ACP') final decision on conditions relating to the planning permission for the North Runway, and the 32 million passengers per annum ('mppa') passenger cap relating to terminal 1 and terminal 2.
- 2.15 The pre-meeting of the Coordination Committee took place on 12 March 2026. At this meeting, the To70 simulation modelling results were discussed. Dublin Airport also presented various pieces of analysis and modelling results to Committee members, namely:
- An update on airfield performance, On Time Performance (OTP) in Winter 2025 compared to Winter 2024, prospective projects expected to be delivered for Winter 2026, and projects that are expected to be under construction in Winter 2026.
 - Simulation modelling carried out for Dublin Airport by ARUP.
 - An update from ACL.
 - Coordination parameter proposals for Winter 2026.
- 2.16 At the pre-meeting, Dublin Airport provided an update on the Infrastructure Application submitted to Fingal County Council, on planned legislation relating to the 32mppa Conditions, and an update on the enforcement of the 32mppa Conditions (defined and discussed in Section 4):
- On the Infrastructure Application, Dublin Airport stated it did not anticipate a decision in 2026 and that it is highly likely any decision would be appealed to ACP, taking at least a further 12-18 months.
 - On Government legislation, Dublin Airport updated the Committee on the publication of the General Scheme for the Dublin Airport (Passenger Capacity) Bill,⁴ which relates to the issue of passenger caps at Dublin Airport.
 - Dublin Airport updated the Coordination Committee on its Judicial Review challenging an Enforcement Notice issued by Fingal County Council for alleged non-compliance with the

⁴ [General Scheme for the Dublin Airport \(Passenger Capacity\) Bill 2026](#)

32mppa Conditions. It also updated the Coordination Committee on Judicial Reviews taken in respect of the IAA's decision to implement a seat capacity parameter for W24 and S25, and stated its belief that there is *'no indication that 32m annual passenger condition will form part of the W26/27 Coordination Parameters'*.

2.17 Dublin Airport also provided a further update to the Coordination Committee on ACP's Final Decision on conditions relating to the planning permission for the North Runway. In summary, the Final Decision provided for:

- North Runway Operating Hours: Runway 10L/28R shall not be used for take-off or landing between 0000 and 0600 (local time) except in cases of safety, maintenance considerations, exceptional air traffic conditions, adverse weather, technical faults in air traffic control systems or declared emergencies at other airports where Runway 10L/28R length is required for a specific aircraft type.
- Implementation of a night-time noise quota: The Airport shall be subject to a Noise Quota Scheme (NQS) with an annual limit of 16,260 between 2300 and 0700 (local time) with noise-related limits on the aircraft permitted to operate at night.
- Implementation of a night-time movement cap: The airport shall be subject to an annual aircraft movement limit of 35,672 between the nighttime house of 2300 and 0700 (local time).
- Changes to the noise insulation scheme

2.18 Dublin Airport updated the Committee that ACP notified the European Commission of the proposed operating restrictions on 8 August. On 10 February 2026, the European Commission, with respect to the process for introducing operating restriction (Regulation (EU) 598/2014 of the European Parliament and of the Council⁵), found that the night movement cap is not in accordance with EU law:

- *"ACP concluded that the annual night movement cap, which constitutes an operating restriction, is necessary to achieve the noise abatement objective considering the L_{Amax} indicator, without any assessment of whether measures from the other three pillars of the balanced approach could have achieved the objective, contrary to Articles 5(3) (a)-(c) of Regulation (EU) 598/2014."*
- *"Ireland shall examine this Decision and inform the Commission of their intentions before introducing those operating restrictions at Dublin Airport."*

2.19 Dublin Airport noted that on foot of the European Commission's assessment, it remains to be seen how ACP intends to proceed.

2.20 Finally, as Ireland will hold the rotating Presidency of the Council of the European Union from 1st July to 31st December 2026, Dublin Airport informed the Committee that slot procedures to ensure the efficient use of capacity will be put in place.

Coordination Committee vote

2.21 The Coordination Committee met again on 24 March 2026 to finalise its advice for the IAA in respect of W26.

2.22 At this meeting, Aer Lingus queried whether the Coordination Committee was to approve special procedures in relation to Ireland holding the rotating seat of the EU Presidency, noting that a draft proposal of these special procedures has not been circulated. Dublin Airport clarified that the Committee was not being asked to vote on these procedures, and

⁵ [Regulation - 598/2014 - EN - EUR-Lex](#)

noted that the procedures would be similar to other large-scale events at Dublin Airport. Dublin Airport stated the rules did not necessarily relate to the airlines of the Committee, which was why the Committee was not being asked to vote on the procedures, but rather the update on the EU Presidency had only been included in the pre-meet as an information piece.

- 2.23 AirNav Ireland informed the Coordination Committee that any airlines looking for slots in the 0600 hour between 0600 and 0615 is a difficult period for AirNav Ireland due to shift changeovers. AirNav Ireland also updated that there are currently changes being discussed which are coming into effect in May with respect to westerly operations. We note that subsequent to the publication of our Draft Decision, AirNav Ireland then clarified that the 0600-615 period is related to ATCO rostering and is an internal AirNav Ireland matter and does not impact slot availability. Additionally, there are no changes currently being discussed which will come into effect in May in relation to Westerly operations at Dublin airport.
- 2.24 There were no further comments from any other Committee member. The voting process was therefore discussed.
- 2.25 Voting rights for Committee members are set out in the Coordination Committee constitution. A set number of votes are allocated to Dublin Airport and AirNav Ireland, with the rest allocated to airlines based on the number of movements flown at Dublin Airport in the preceding year, meaning that most of the voting weight is held by airlines and, in particular, Ryanair and Aer Lingus. Only those present (online or in person) can vote.
- 2.26 We note that the voting process is an indicative part of the Coordination Committee's advice to the IAA, rather than the IAA being bound by the result. As part of the process, we seek to take into account all positions set out by Coordination Committee members, as well as any associated comments or evidence relevant to the parameter declaration.
- 2.27 The results of the vote on the proposed R60 limits are set out in Appendix 1. Overall, a majority voted in favour of the W26 Wishlist limits (93% in favour and 7% opposed). Just United Airlines, daa, and KLM were not in favour of the W26 Wishlist limits. No specific reasons were provided. No change was proposed in respect of the 10-minute runway limits.
- 2.28 The Coordination Committee voted in favour of increasing the departing passenger parameter for Terminal 1 and Terminal 2, with 93% of the vote in favour, 5% against, and 1% abstaining. United Airlines and daa voted against the proposal (again no reasons being provided). No proposals were made in respect of the arrivals PTB hourly limits.
- 2.29 On the final vote, the Coordination Committee voted in favour of adopting the new CBP passenger parameter, with 43% in favour, 5% against, and 52% of the vote abstained. The 52% abstention was largely driven by Ryanair's vote in this respect, with just United Airlines and daa opposed to the proposal.
- 2.30 The Coordination Committee did not vote on any specific change to the stand parameter. However, we note from discussions within the Committee that, in line with S26, a working group will be formed to support a trial which would replace some referrals for aircraft stands. The trial will be monitored in conjunction with ACL and daa operations, with the Coordination Committee working group also contributing to determine whether referral parameters should be permanently replaced.
- 2.31 Therefore, the overall advice of the Coordination Committee is as follows:

- Implement the W26 Wishlist to the runway coordination parameters (R60).
- To increase the Terminal 1 and Terminal 2 departures PTB parameters. There were no proposals in respect of changing the Terminal 1 and 2 arrivals hourly limits.
- To introduce a US Preclearance passenger processing hourly parameter in place of the current referral.

3. Airfield Coordination Parameters

3.1 This section addresses, in turn:

- Runway parameters
- Stand parameters

3.2 In relation to the runway coordination parameters, we have decided to implement the W26 Wishlist for the W26 season, as shown in Table 3.1.

Table 3.1: Changes to runway limits for Winter 2026 (W26 Wishlist)

UTC Hour*	Arrival	Departure	Totals
0700		+4	+4
0800	+3		+3
0900	+3		+3
1000		+3	+3
1100	+2		+2
1200		+1	+4
1300			+2
1400	+2		+2
1600		+3	+3
1700	+3		+3
1800		+3	+3
2100	+3		
Total	+16	+14	+32

Source: IAA

3.3 We make no changes to the respective R10 limits for dual and single runway operations.

3.4 We retain the stand parameter as a hard constraint, while amending the scope of the referrals to allow for a trial in respect of the potential replacement of stand referrals in future seasons.

Runway Capacity

3.5 In this subsection, we consider runway capacity limits.

To70 airfield modelling

3.6 As described above, To70 first validated the airfield model and then simulated the W26 flight schedule.

3.7 The model calibration process was based on 8 Nov 2025, using actual block times. The simulated metrics (taxi out times, runway throughput, counts of aircraft coming on block, off block, lifting off and touching down) show a close match with the actual data both in magnitude and daily profile.

3.8 Taxi out time measures the time elapsed from the aircraft coming off blocks until it lifts off.

Departure ground delay is the accumulation of all delay experienced in the same period, i.e. all components of taxi-out time other than unimpeded taxi-time. The estimated effect of proposed airfield capacity increases on these metrics is, in our view, the best way to assess the capacity of the airfield to deliver a flight schedule.

- 3.9 Efficient towing of aircraft occurs in the model. Taxiway, towing, runway, and runway exit usage restrictions and patterns have been implemented in the model. Given the close match in the model validation outputs, it is our view that no significant airfield capacity affecting element has been omitted from the model. Airfield infrastructure was updated in the model, based on the expected situation during W26 in relation to taxiway closures for works and projects expected to be complete. No changes are assumed in respect of operating procedures for minimum aircraft separations.
- 3.10 In each scenario, for the purposes of properly assessing airfield/runway capacity only, it is presumed that the Winter 2026 schedule of a high level of increased demand materialises. We have previously observed a general pattern whereby airlines may accept sub-optimal slots (whether in relation to timing, series fragmentation, or both) in order to meet demand for an operation. To capture this trend, our baseline scenario assumes that this redistribution effect occurs, with these new services operating at the nearest available time, given the effective runway limits for that scenario, in the simulation.
- 3.11 The Winter 2026 flight schedule was based on expected W26 demand, but also with sufficient operations to properly test out the proposed R60 capacity increases. It contains a total of 848 flights, with 425 arrivals and 423 departures. The flight schedule included 53 new arrivals and 51 new departures. Most of these movements could be accommodated at the times requested without any changes to the runway limits.
- 3.12 This level of assumed growth means that some of the modelled operations may not materialise in W26, and thus the schedule can be considered as an aggressive growth scenario, with a likelihood that the performance metrics produced by the model may be worse relative to those likely to be observed if growth is weaker. Nonetheless, we consider it important to fully test out the potential impact of a decision to increase the capacity, and that capacity is used. To assess the effect of a decision to implement the W26 Wishlist relative to maintaining the W25 limits, we asked To70 to simulate the W26 Schedule scenario.
- 3.13 Table 3.2 summarises the results of the W26 Wishlist and the W25 limits simulations as provided to the Coordination Committee. Further details are set out in the To70 simulations published alongside this Draft Decision.

Table 3.2: Departure Taxi Out Time under W25 Limits and W26 Wishlist Proposal

Time (UTC)	W26 Wishlist Limits	W25 Limits	Difference
Daily average	00:12:16	00:12:09	00:00:07
Peak	00:15:08	00:14:53	00:00:15

Source: To70, Slide 19. Taxi times in hours, minutes and seconds.

Peak times refer to the window with the highest average value. Values are in hours, minutes and seconds.

- 3.14 Relative to maintaining the W25 limits unchanged, the W26 Wishlist proposal is not expected to have a material impact on taxi-out times on average across the day, or on peak taxi-out times.
- 3.15 Similarly, both arrival taxi-in time and arrival taxi delay are not expected to materially differ under the W26 Wishlist limits relative to maintaining the W25 limits, as shown in Table 3.3.

Table 3.3: Arrival Taxi-In Time and Arrival Taxi Delay under W25 Limits and W26 Wishlist Proposal

Metric	Time (UTC)	W26 Wishlist Limits	W25 Limits
Arrival Taxi-In Time	Daily Average	00:09:30	00:09:03
Arrival Taxi Delay	Daily Average	00:00:42	00:00:33

Source: To70, Slide 21. Taxi times in hours, minutes and seconds.

Other Modelling

- 3.16 Dublin Airport commissioned ARUP to carry out simulation modelling on its behalf, which was also presented to the Coordination Committee.

Taxi Out times and On Time Performance (OTP) in Winter 2025

- 3.17 At the Coordination Committee pre-meeting, Dublin Airport provided an update on outturn operational performance in Winter 2025 compared to Winter 2024, from November to February inclusive. Overall, OTP is at 75% for W25, which is in line with Winter 2024.
- 3.18 As we have noted previously, there are many factors which influence OTP at Dublin Airport other than those which relate to airport capacity. Delay coded to Aircraft Rotation remains the most significant contributor, and its contribution has increased by 1 percentage point relative to W24 (28% in W25 compared with 27% in W24).
- 3.19 Across the full day, average taxi-out times to RW 28R have marginally disimproved compared with W24. Average taxi-out times in W25 were 12 mins 39 secs, an increase of 28 seconds on W24. For RW 28L, average taxi-out times have disimproved by 1 min 45 secs compared with W24. Average taxi-in times across the whole day have also marginally increased (+28 secs), but remain largely in line with W24.
- 3.20 A number of airfield, terminal, and pier projects are expected by Dublin Airport to be available in whole or in part for the W26 season. These are shown in Table 3.4 below.

Table 3.4: Major projects expected by Dublin Airport for W26 relative to W25

Airfield	Terminals and Piers
Dual code E taxiways B1/Z to South Apron	T2 Security C3 upgrade & T1 Central Search to Mezzanine
LVP on Runway 10L	51 st and Green refurbishment
B2 bi-directional	T1 lounge refurbishment
P1W Stands	Pier 3 Upgrade

Source: Coordination Committee

Draft Decision

- 3.21 Under the Slot Regulation, the runway parameters are to be reviewed with a view to increasing the capacity and number of slots available for allocation, based on an objective analysis of the possibilities of accommodating the air traffic.
- 3.22 We assessed the simulation modelling results of the W26 Wishlist as acceptable, with marginal overall impact or difference with respect to taxi times and delay. This modelling takes account of infrastructural, operational, and environmental constraints. We note that the Coordination Committee members voted for one of the two possible scenarios on a discrete basis, with the majority voting for the adoption of the W26 Wishlist limits. Given these considerations, we propose to adopt the W26 Wishlist as the runway coordination parameters for W26.
- 3.23 We noted that in recent capacity declarations, we have sought to take account of the potential constraining factor represented by Condition 5 of the North Runway planning permission ("C5"), as imposed in 2007. This condition is the subject of disagreement and uncertainty both as to its enforceability and, to the extent that it is enforceable, the precise nature and scope of the constraining factor which it represents. We noted that C5 therefore gives rise to complex questions of planning law, EU law, and international law, and is currently the subject of High Court proceedings to which the IAA is a notice party. On this basis, in previous capacity decisions we proposed to continue to maintain the R60 parameters in the nighttime hours (2300 – 0700 local), such that the declared runway capacity would remain in line with the pre-existing single (southern) runway capacity, before the North Runway was completed. That is, slots in the relevant hours would continue to be allocated only to the extent that was possible before the North Runway itself was completed.
- 3.24 On 16 July 2025, ACP published the Relevant Action Decision. The Relevant Action Decision revokes Condition 5 of the North Runway Planning Permission and replaces it with a NQS. We noted that a further point of disagreement has now also arisen as to whether the revocation of C5 is also now already effective from a planning law perspective.

First Condition:

The existing operating restriction, Condition 5, of the North Runway Planning Permission (FCC Reg. Ref: F04A/1755; ABP Ref: PL06F.217429) reading as:

'On completion of construction of the runway hereby permitted, the average number of night time aircraft movements at the airport shall not exceed 65/night (between 2300 hours and 0700 hours) when measured over the 92 day modelling period as set out in the reply to the further information request received by An Bord Pleanála on the 5th day of March, 2007'

shall be revoked and replaced with an annual noise quota scheme operating restriction as follows:

'The Airport shall be subject to a Noise Quota Scheme (NQS) with an annual limit of 16,260 between 23:00 and 07:00 (local time) with noise-related limits on the aircraft permitted to operate at night.'

3.25 A number of other conditions are included in the decision, including:

Second Condition:

The existing operating restriction imposed by Condition 3(d) and the exceptions at the end of Condition 3 of the North Runway Parallel Runway Planning Permission (FCC Reg. Ref: F04A/1755; ABP Ref: PL06F.217428) reading:

'3(d). Runway 10L-28R shall not be used for take-off or landing between 2300 hours and 0700 hours except in cases of safety, maintenance considerations, exceptional air traffic conditions, adverse weather, technical faults in air traffic control systems or declared emergencies at other airports.'

shall be amended as follows:

'Runway 10L/28R shall not be used for take-off or landing between 00:00 and 06:00 (local time) except in cases of safety, maintenance considerations, exceptional air traffic conditions, adverse weather, technical faults in air traffic control systems or declared emergencies at other airports or where Runway 10L/28R length is required for a specific aircraft type.'

Third Condition:

'The airport shall be subject to an annual aircraft movement limit of 35,672 between the nighttime hours of 2300 and 0700 (local time).'

3.26 On 8 August 2025, ACP notified the European Commission of the operating restrictions pursuant to Article 8(1) of EU Regulation 598/2014 (the '2014 Regulation')⁶:

'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.'

3.27 We noted that judicial review proceedings in respect of ACP's Relevant Action decision have been launched by Ryanair, Aer Lingus, and SMTW Environmental DAC. Those proceedings were adjourned pending the decision of the European Commission as to whether the proposed Operating Restrictions are in compliance with the 2014 Regulation. We stated, as mentioned above, the European Commission has found that the annual movement cap condition was arrived at in a manner which does not comply with that regulation. No adverse findings were made in respect of the other two conditions (i.e. the NQC Operating Restriction, and the North Runway operating hours).

3.28 We stated that it is unclear how ACP intends to move forward following the European Commission's assessment and noted that while no adverse finding was made in respect of the NQC Operating Restriction, ACP has not yet confirmed the introduction of the same ahead of W26, meaning that it is not yet permissible to take account of it as a relevant constraint for the purposes of Article 6 of the Slot Regulation.

⁶ [Regulation - 598/2014 - EN - EUR-Lex](#)

- 3.29 We stated that the result of this situation is that it remains the case that currently, neither the original C5, nor the replacement NQC scheme, can be reflected in the coordination parameters for W26 and noted that this may change in the event that ACP were to confirm to the European Commission that the NQC scheme is introduced.
- 3.30 In the interim, we noted that the Coordination Committee had again proposed that no changes be made to the R60 limits in the night hours relative to those which were in place prior to completion of the North Runway. This would again mean that no capacity has been added between 2300 and 0700 local time since completion of construction of the North Runway, meaning that the North Runway cannot lead to more flights in this period than were previously possible under the single Runway 28L based capacity declaration. We proposed to continue to adopt this approach for W26, and freeze the runway coordination parameters within those hours such that they remained based on single runway operations, as though the North Runway did not exist.

Responses to the Draft Decision

- 3.31 We received a number of submissions in response to the proposed runway parameters, primarily from local residents and residents' groups as well as airlines. Those submissions raised various points, each of which we have considered. We have categorized the main points made as relating to the following:
- Condition 5 of the North Runway Planning Permission
 - Other planning and environmental law considerations
 - The nature of a 'constraint' under the Slot Regulation, and in particular the nature of an 'environmental constraint'.
 - Other submissions

Condition 5 of the North Runway Planning Permission

- 3.32 Ryanair, referring to the European Commission's findings, states its support for not including an annual night movement cap as set out in the ACP Relevant Action decision.
- 3.33 Saint Margarets the Ward Residents Group ('SMTW') submits that C5 imposes a strict limit on nighttime aircraft movements, and references the EU Commission's finding that the ACP process for introducing operating restrictions did not comply with the Balanced Approach. It asserts that the absence of a proper Balanced Approach analysis means that all Operating Restrictions are procedurally vulnerable, and that the absence of adverse findings by the EU Commission in respect of two of them (the NQS, and the North Runway nighttime operating hours) cannot be read as implicit approval. It asserts that the role of the EU Commission is *'limited to procedural compliance and does not reassess the scientific robustness, alternatives, or proportionality of the measures.'*
- 3.34 SMTW submits that C5 remains a valid and enforceable planning condition. It states that breach of this condition exposes daa to potential enforcement action, including administrative and criminal sanctions and possible court orders requiring compliance. It highlights various judgements in which the High Court has emphasised the importance of compliance with planning law.
- 3.35 SMTW claims that the Draft Decision does not address or plan for the scenario in which enforcement action is taken against daa for breach of Condition 5 under section 160 of the Planning and Development Act 2000. The absence of any contingency or operational plan

for enforcement action, it states, exposes the slot coordination process to significant legal and operational risk, including abrupt operational constraints and disruption to slot allocation.

- 3.36 The McDonnell family submits that the proposed increase is inconsistent with planning and infrastructure realities. They state that as ongoing High Court judicial reviews and uncertainty regarding noise quotas and EU compliance remain, determining slot capacity in advance of legal clarity pre-empts outcomes and undermines procedural fairness. They request the IAA maintain strict and enforceable nighttime protections which arose from the 2007 planning process.
- 3.37 The North Runway Technical Group ('NRTG') supports the approach of maintaining the R60 parameters in the night hours at pre-North Runway levels.

IAA Response

- 3.38 As noted in the Draft Decision, we have previously given careful consideration to the issues generated by C5, and the proper approach to the coordination parameters pending resolution of those issues.⁷ While STMW asserts that C5 is a valid and enforceable condition, that position is disputed by various parties in ongoing proceedings, including daa and airlines. C5 remains the subject of disagreement and uncertainty both as to its enforceability and, to the extent that it is enforceable, the precise nature and scope of the constraining factor which it represents. C5 gives rise to complex questions of planning law, EU law, and international law, and has, since 2023, been the subject of High Court proceedings to which the IAA is a notice party. A High Court stay imposed on the C5 enforcement notice served by Fingal County Council upon daa remains in place.
- 3.39 More recently, a further issue has arisen in the ongoing proceedings challenging the ACP decision as to whether C5 remains an extant planning condition, given the decision of ACP to revoke it, and the lack of any express legal bar in terms of that element of the decision taking effect immediately (as typically the case with the revocation of a planning condition), which is in contrast to the elements of that decision which impose new Operating Restrictions which must undergo an introduction process pursuant to the 2014 Regulation. The IAA has not adopted any position on this point, but this is another issue that would require to be resolved before the status of C5 as a relevant constraint, or otherwise, could be ascertained.
- 3.40 In these circumstances, there is no basis upon which the IAA could take a different approach to that which it has taken to date, i.e. to maintain the R60 limits based on the pre-North Runway capacity for the relevant night hours. As explained in the S23 decision, it can be noted that this approach indeed aligns with the original intended purpose of C5, which was to prevent the North Runway leading to an overall deterioration in night noise conditions relative to the circumstances which would prevail in its absence.
- 3.41 In relation to suggestions that we await legal clarity before determining slot capacity, the Slot Regulation requires us to set the coordination parameters for W26 at this time, taking account of relevant constraints insofar as we can. It then requires ACL to complete the full initial allocation process in May. We cannot postpone that declaration until some future point where there may be legal clarity on this issue, or make some sort of contingent declaration on the basis of speculation as to what may emerge from the various proceedings. Any such clarity can inform future decisions subsequent to that clarity becoming available. The IAA is a notice party to the various proceedings and will continue to engage as

⁷ See, in particular, the S23 decision.

appropriate in those proceedings to seek to ensure that they proceed on the basis of a full understanding of the interactions with the Slot Regulation and associated processes, and the timings involved with those processes.

- 3.42 In relation to the European Commission's review of notified Operating Restrictions, we note that this is not limited to procedural issues, but also, where relevant, also encompasses a substantive review of whether the Balanced Approach has been correctly applied in relation to the notified Operating Restriction(s). For example, the EU Commission's 2025 decision in respect of Amsterdam Airport Schiphol found that while the correct procedure was followed, the Netherlands ought to have further considered the potential of fleet renewal to reduce aircraft noise, as well as potential improvements to flight procedures (i.e. flightpaths and airspace design), before resorting to the proposed Operating Restrictions.⁸

Other planning and environmental law considerations

- 3.43 SMTW submits that the allocation of additional slots has the direct and foreseeable effect of increasing aircraft movements and, in turn, aircraft noise exposure for residents living around Dublin Airport. These increased noise impacts, it states, have not been subject to any Strategic Environmental Assessment ('SEA'), project-level Environmental Impact Assessment ('EIA'), or Appropriate Assessment ('AA'), nor have they been authorised through a grant of planning permission. Therefore, it states, the noise environment now being experienced by local communities extends beyond the environmental baseline assessed and approved in the relevant EIAs, SEAs, and planning consent.
- 3.44 SMTW states that under Directive 2001/42/EC (the SEA Directive), plans or programmes prepared or adopted by a public authority which set the framework for future development consent and are likely to have significant effects on the environment must be subject to assessment before adoption.
- 3.45 SMTW submits that by facilitating additional slots without any assessment of the resultant increase in aircraft noise, population exposure, or health impacts, the Draft Decision constitutes a material change to the environmental baseline and sets the framework for intensified airport operation without prior environmental assessment, thus undermining the preventative purpose of the SEA Directive, exposing affected residents to increased noise impacts that have neither been environmentally assessed nor authorised through the planning system. It also states as the draft decision has been made without reference to a contemporary environmental baseline, cumulative impacts on noise, emissions, and population exposure are not properly assessed, which is inconsistent with both the Slot Regulation and national climate obligations.
- 3.46 SMTW also submits that the IAA has failed to carry out its duties under Section 15 of the Climate Action and Low Carbon Development Act 2015 (as amended), by not properly assessing, addressing, or mitigating greenhouse gas emissions resulting from the draft decision.

IAA Response

- 3.47 These aspects of the SMTW response are misconceived. The IAA is not the developer, nor the owner, of the airport infrastructure or of its associated planning permissions. Setting coordination parameters is not development, nor is it a 'project' for the purposes of the EIA

⁸ https://transport.ec.europa.eu/news-events/news/commission-adopts-decision-schiphol-airport-noise-reduction-plan-2025-03-05_en

Directive. Nor is it a plan shaping future development for the purposes of the SEA Directive; the determination of coordination parameters for W26 does not bind, nor set a framework for, the planning authorities in respect of any future development consent applications which might be made to them. Contrary to the claims of SMTW, the IAA does not require planning permission to determine seasonal coordination parameters, nor to discharge any of its other regulatory decision-making functions.

- 3.48 It should be noted that the higher available runway capacity during the day hours is because of the capacity provided by the North Runway. The North Runway is permitted development for which daa received planning permission in 2007, and received an extension to that planning permission in 2017. Permission was granted primarily on the basis of the additional runway capacity which the North Runway would provide.
- 3.49 The airport processors in respect of which the IAA sets coordination parameters are already permitted development, which will have been subject to applicable planning assessment, including applicable environmental assessments such as those referenced by STMW, at the time when permission was granted. Any subsequent allegations of non-compliance by daa with conditions attached to those permissions is a matter to be determined by planning authorities and/or the Courts.
- 3.50 The submissions from SMTW in this regard propose an unworkable and duplicative intermingling of various statutory schemes with the result that all of the IAA's regulatory decisions, whether safety, security, or economic decisions, as well as those of other regulators, must follow planning and development processes in respect of infrastructure which they regulate. Further, on this interpretation, ACL would presumably also need to carry out EIA/SEA, and obtain Planning Permission, for the initial allocation of actual slots, as would Air Navigation Service Providers in respect of operational planning and air traffic flow management measures.
- 3.51 In reality, coordination parameters are determined biannually in respect of dozens of airports across Europe. We are not aware of any example where an interested party has claimed that those decisions engage such schemes, much less any example where any EIA/SEA has been carried out, or development consent sought, in respect of coordination parameters.
- 3.52 In relation to Section 15 of the Climate Action and Low Carbon Development Act 2015 (as amended), the IAA has previously explained that it is not, in any case, a 'relevant body' for the purposes of that section.⁹

Environmental Constraints

- 3.53 The North Runway Technical Group ('NRTG') submits that planning conditions and environmental constraints are not the same thing. It states that the Draft Decision treats the environmental limb of Article 6(1) of the Slot Regulation as though it means only legally enforceable planning conditions, and finding those conditions currently unenforceable or uncertain, proceeds as though no environmental constraints exist. It submits that the underlying reality, noise exposure affecting thousands of residents, does not depend on the enforceability of any planning condition, and that Article 6(1) of the Slot Regulation requires the IAA to take account of the environmental constraint itself, not ask whether a particular legal instrument compelling it to do so is currently in force.

⁹See for example paragraph 3.40: https://www.iaa.ie/docs/default-source/publications/corporate-publications/economic-regulation/2026-determination-on-airport-charges-at-dublin---issues-paper-consultation.pdf?sfvrsn=714ca45f_9

3.54 Referring to Article 2(m), Article 6(1) and Article 3(3) of the Slot Regulation, the NRTG submits that these provisions establish three mandatory limbs for the determination of any parameter: technical, operational, and environmental. It states the draft decision contains extensive analysis of the technical and operational limbs, but it can find no equivalent analysis of the environmental limb. In particular, it states the draft decision does not:

- Identify what environmental constraints exist at Dublin Airport
- Reference Dublin Airport’s strategic noise maps under Directive 2002/49/EC (the Environmental Noise Directive)
- Reference Dublin Airport’s Noise Action Plan 2024-2028 which is the current END action plan for the airport
- Assess whether the proposed increase of 32 movements per day would affect noise exposure levels at the airport or in the surrounding communities
- Reference any input from ANCA on the environmental implications of the proposed capacity increase
- Explain how the proposed parameters take account of Article 2(m) of the Slot Regulation

3.55 Referencing the Noise Action Plan 2024-2028, the NRTG states the information within it is directly relevant to the environmental limb, and Article 6(1) requires the IAA to take this into account. NRTG also refers to the fact that some of the NAO objectives (in particular the 55dB Lden exposure target) were not met in 2023.¹⁰

3.56 With reference to *‘sequencing of capacity decisions and environmental assessment’*, NRTG refers to ANCA’s intention to publish a draft regulatory decision on operating restrictions at Dublin Airport under the 2019 Act. The Noise Action Plan 2024-2028 has been completed, it submits, but its findings on worsening noise exposure have not been integrated into any capacity decision, and the environmental constraints relevant to the parameter determination under Article 6(1) of the Slot Regulation are not being assessed by any body, on any timeline, in a form that feeds into coordination parameters. It states that the ANCA regulatory decision is unlikely to be published prior to the W26 season commencing, with the capacity decision therefore becoming locked in before *‘the environmental assessment is complete’*. In this context, the NRTG refers to the historical precedence mechanism in Article 8(2) of the Slot Regulation and states that capacity increases embedded in coordination parameters are self-reinforcing, with any future reduction in capacity requiring the displacement of historic slots.

3.57 NRTG supports the approach of freezing the R60 parameters in the night hours at pre-North Runway levels. However, it questions why the same logic has not been applied to the daytime parameters. It claims that no Balanced Approach has been completed, ANCA’s regulatory decision remains outstanding, and the strategic noise maps have not been updated to reflect flight paths in use since August 2022. It submits that the Noise Action Plan 2024-2028 has not been consulted in the preparation of the Draft Decision.

3.58 The McDonnell Family states that capacity is being defined incorrectly, being assessed based on runway throughput, taxi-times, and scheduling efficiency. They submit that this approach fails to incorporate human health impacts, real noise exposure, environmental constraints and community sustainability. They state they are being asked to absorb increased environmental and health impacts for negligible operation gains, submitting that increased capacity results in only marginal changes in taxi-times, and there is no requirement for an

¹⁰ We note that this target was not met in subsequent years either.

increase to capacity as demand can be accommodated within existing limits through redistribution.

IAA Response

- 3.59 These submissions are based on a misunderstanding of the nature of the Slot Regulation, and of the broader regulatory framework. They advocate that the IAA should take upon itself the role of noise regulator under the 2014 Regulation, when the IAA is instead carrying the function of setting coordination parameters under the Slot Regulation. The IAA has no jurisdiction to do so, and in any event the task of setting coordination parameters cannot be co-opted to regulate airport noise in the manner suggested. This is quite clear from the respective statutory schemes.
- 3.60 When setting coordination parameters, the IAA takes account of relevant constraints which are anticipated to limit the ability of the airport to process passengers or aircraft during the relevant season. We do not develop or create such constraints ourselves as part of that process. For example, minimum required aircraft separations limit the ability of the runways to process aircraft. Those separation requirements have been determined on the basis of safety requirements. When setting coordination parameters, those rules are an input into the capacity analysis; they are not established or imposed by the IAA as part of the slot coordination process itself. The same goes for any environmental constraints which are directed at regulating the impact of air traffic noise on residential amenity.
- 3.61 Article 8(1) of the 2014 Regulation requires that any Operating Restriction must be notified to the European Commission at least eight months before the declaration of coordination parameters in which it is anticipated that the Operating Restriction will be taken account of as an environmental constraint. An Operating Restriction is defined as *'a noise-related action that limits access to or reduces the operational capacity of an airport'*. In relation to Dublin Airport, such actions can only be taken by ANCA (or ACP on appeal), having applied the Balanced Approach and following completion of the notification and review process with the European Commission. The IAA cannot circumvent these requirements by creating or determining any such restriction itself when determining coordination parameter(s), which would be in clear breach of EU law. It is the role of the IAA to ensure that account is taken of any such Operating Restriction as might be introduced by ANCA, not to determine any such Operating Restriction itself.
- 3.62 For the avoidance of doubt, whether a review is undertaken pursuant to the 2019 Act or the 2014 Regulation, it is only permissible for an Operating Restriction to be imposed on the basis of the Balanced Approach methodology, and also having followed the introduction timeline set out in the 2014 Regulation. It is already long past the point that any new Operating Restriction from any upcoming review by ANCA (as referenced by NRTG) could be a relevant constraint in time for W26. Further, there is no basis to understate capacity for W26 for fear that such review by ANCA might possibly lead to a future requirement to reduce slots below the level of historic entitlements. The IAA's position, supported by the AG's opinion,¹¹ is that the Slot Regulation would permit for historic slots to not be reallocated in such a scenario.
- 3.63 It is not the case that only legally enforceable planning conditions can amount to such relevant constraints. Operating Restrictions lawfully determined pursuant to the 2014 Regulation also constitute environmental constraints. The position in EU law is that aircraft

¹¹ Case C-857/24 daa and Others v Irish Aviation Authority, Opinion of Advocate General Campos Sánchez-Bordona delivered on 12 February 2026..

noise regulation, including Operating Restrictions but also operational procedures such as flight procedures, are governed by the 2014 Regulation from a noise perspective.

- 3.64 As regards not achieving the 55dB Lnight NAO target, as described by NRTG, while this is a matter for ANCA, we note that the package of measures which were determined in 2022 in order to do so were not yet put into effect. In particular, we understand that reducing the North Runway curfew to 2400-0600 (local time) is an important element of achieving that aspect of the NAO, in order to reduce the extent to which traffic is using the south runway in mixed mode during the nighttime shoulder hours.
- 3.65 As regards environmental constraints, the IAA has previously given careful consideration to the issue of C5, as noted above. Once a new Operating Restriction(s) emerges from the ACP and/or ANCA processes, such as an NQC scheme, similarly extensive analysis would be needed, likely including a local rule, and this will be undertaken once any such constraint is actually operative in sufficient time (as required by the 2014 Regulation) ahead of the relevant capacity declaration.
- 3.66 In relation to the comments from the McDonnell family, we note that the conclusion from the taxi-time analysis is that the additional runway capacity can provide improved scheduling flexibility (thereby better accommodating the expected traffic demand) without causing any operational deterioration. It does not suggest that there will be any particular environmental or health impacts.

Other Submissions

- 3.67 Aer Lingus is supportive of the draft decision concerning the proposed changes to runway parameters, and states that these are in line with the advice given by the Coordination Committee.
- 3.68 Ryanair also states its support of the draft decision concerning the proposed changes to runway parameters, and states that the draft decision aligns with national aviation policy and supports the growth and connectivity objective of Dublin Airport. It submits that the increased capacity will enhance operational efficiency, reduce delays, and improve the overall passenger experience.
- 3.69 SMTW submits that the Draft Decision fails to engage substantively with the dissent of the airport operator, raising concerns about the adequacy of reasons, particularly where that dissent may reflect operational or legal constraints directly relevant to Article 6(1) of the Slot Regulation. It states that the Draft Decision treats Dublin Airport's opposition as purely a numerical minority position.
- 3.70 SMTW states that the IAA should ensure meaningful stakeholder consultation and public participation in the slot determination process, in line with Aarhus Convention principles and EU law, and it refers to the Slot Regulation, Aarhus Convention, and CJEU case law. It submits that the coordination process is consultative and that the IAA is not obliged to adopt minority views, but is required to provide reasoned responses to substantive objections and to demonstrate that all relevant technical, operational, and environmental constraints have been weighed and considered.

IAA Response

- 3.71 Dublin Airport provided no reasons for its decision to ultimately vote against all of the coordination parameter proposals (notwithstanding that, as set out in the Draft Decision,

they were Dublin Airport's own), whether within the Coordination Committee, or in response to the Draft Decision. If Dublin Airport had any specific concerns of the sort suggested by STMW, it could have raised them, but it has not done so. Consequently, it is not apparent that there was, or is, anything substantive for the IAA to consider. It is not for the IAA to speculate on possible reasons for the approach taken by Dublin Airport in this regard.

3.72 As noted above, it is important to reiterate that the declaration of coordination parameters is a technical scheduling function in which constraints are taken account of, rather than created, and thus is not a forum in which actual environmental decisions are made (those being primarily the planning process, and in respect of aircraft noise, under the 2014 Regulation). Nonetheless, as reflected here, the IAA does issue a draft decision ahead of each season, following which we provide reasoned responses to submissions made. To the best of our knowledge, it is relatively rare for any public consultation to take place in respect of the determination of proposed coordination parameters at EU airports.

Final Decision

3.73 In conclusion, we do not consider that any of the above submissions warrant any changes in relation to the approach to the runway coordination parameters. Consequently, those have been determined in line with the proposals in the Draft Decision.

Parking Stands

Draft Decision

3.74 We noted there were no proposals brought to the Coordination Committee for any change to the stand parameters. However, we understood the trial which was introduced for S26 to investigate whether stand referrals could be eliminated or reduced was to continue for W26, with a working group formed to provide support. As for S26, we stated we understood the trial would be monitored throughout the season in conjunction with ACL and daa operations, with a Coordination Committee working group.¹²

3.75 We stated our agreement with the principle of reducing or eliminating referrals insofar as possible, and also our agreement that this should be done in a planned way such that the replacement coordination parameters are properly tested before taking effect, to ensure that there is no performance degradation in terms of making best use of capacity without excessive scheduling such that stand capacity is overloaded. We therefore proposed to amend the wording of the stand referral parameter within the capacity declaration accordingly. We stated any removal of, or amendment to the scope of, stand referrals, will be subject to IAA approval/confirmation.

3.76 We also proposed to update the stand count, as usual, to reflect seasonal changes.

Responses to the Draft Decision

3.77 Aer Lingus states its support for the proposed increases to the Dublin Airport coordination parameters and submits these increases are in line with the advice given by the Coordination Committee.

¹² See Section 3 of the S26 Final Decision - [final-decision-on-summer-2026-coordination-parameters-at-dublin-airport.pdf](#)

Final Decision

3.78 We confirm that the Final Decision remains in line with the proposals in the Draft Decision.

4. Terminal Building Coordination Parameters

- 4.1 We have decided to adopt the uplifted Terminal 1 and Terminal 2 departures rolling hourly Passenger Terminal Buildings (PTB) limits as proposed by Dublin Airport, and to roll forward the Terminal 1 and Terminal 2 arrivals rolling hourly PTB limits from W25. We also adopt the new US Preclearance hourly passenger processing limit in replacement of the blanket referral parameter. The rolling hourly terminal and US Preclearance limits are set out in Table 4.1.
- 4.2 We also maintain the load factor assumptions of 85% for scheduled services in Terminal 1, 85% in Terminal 2, and 95% for charter services. We maintain the referral parameters in relation to Terminal 2 check-in desks as per the W25 coordination parameter.

Table 4.1: Hourly Terminal and US Preclearance Limits – W26

	Departures Hourly Limit	Arrivals Hourly Limit	Preclearance Hourly Limit
Terminal 1	4,325	3,550	-
Terminal 2	3,850	3,050	1,450

Source: IAA

Proposed Hourly Limits – Dublin Airport

- 4.3 Dublin Airport proposed to increase the both the Terminal 1 and Terminal 2 departures PTB hourly limits, based on an assessment of expected available capacity, while rolling forward the respective arrival PTB hourly limits from W25. The expected uplift to the PTB departures hourly limits was assessed based on the processing capacity provided by the roll out of the full complement of C3 machines in both terminals in 2025, an anticipated passenger profile, and a load factor of 85%. Analysis by Dublin Airport found it unlikely that the hourly PTB limits would be a materially constraining factor on the allocation of slots in W26, relative to other limits.
- 4.4 In line with the approach for S26, Dublin Airport also proposed the removal of the US Preclearance referral on new flights and schedule changes, to be replaced by a US Preclearance departing passenger standard coordination parameter of 1,450 per hour. This parameter was similarly based on US Preclearance processing capacity, an assessment of the percentage of passengers that will present within one hour, and a load factor of 90%. It was noted that the W26 Wishlist demand would not be constrained by this processing parameter.

Proposed Referral Limits – Dublin Airport

- 4.5 Dublin Airport proposed retaining the referral parameter for Terminal 2 check-in desks 1-28, where demand exceeds 28 desks.

Seasonal Terminal Seat Capacity Constraint

- 4.6 For the W24 season and the S25 season, we put in place a Passenger Air Traffic Movement (PATM) seat capacity coordination parameter to take account of certain planning conditions relating to Terminals 1 and 2 at Dublin Airport. Specifically, Condition 3 of the Terminal 2 planning permission F06A/1248 (PL 06F.220670), from 2007 states that:

'The combined capacity of Terminal 2 as permitted together with Terminal 1 shall not exceed 32 million passengers per annum unless otherwise authorised by a further grant of planning permission.'

4.7 Similarly, Condition 2 of a Terminal 1 extension planning permission (06F.223469 & F06A/1843), from 2008, states that:

'The combined capacity of Terminal 1 (including the extension authorised by this grant of permission) and Terminal 2 granted permission under planning register reference number F06A/1248 (An Bord Pleanála appeal reference number PL 06F.220670) shall not exceed 32 million passengers per annum unless otherwise authorised by further grant of planning permission.'

4.8 Those conditions therefore impose a constraint not only on the infrastructure which is the subject of the permissions in question, but also on pre-existing infrastructure (i.e. the rest of Terminal 1 other than the extension).

4.9 We refer to these conditions collectively as the '32mppa Conditions'. As set out in the W24 and S25 decisions, the IAA had no role in the decision to impose the 32mppa Conditions and has no power to amend or revoke them. The role of the IAA is to take account of relevant constraints when determining the seasonal coordination parameters. For the reasons set out in detail in those decisions, the IAA considered the 32mppa Conditions to constitute a relevant constraint for the purposes of Article 6 of the Slot Regulation.

4.10 The IAA's conclusion in that regard, and in respect of a number of related points, is disputed by various parties, who have brought a total of six sets of judicial review proceedings which remain ongoing in respect of our W24 and S25 decisions.

4.11 On 10 October 2024 we published our Final Decision on S25 which set a seat capacity limit of 25.2 million seats for the Summer 2025 scheduling season. Ryanair, Aer Lingus, and, together, Delta Air Lines, Inc., JetBlue Airways Corporation, United Airlines, Inc., and Air Transport Association of America, Inc. (known as the 'A4A parties') were granted leave on 21 October 2024 to bring their respective proceedings challenging the S25 Decision, in which they also sought a stay on the operation of the seat cap coordination parameter. The IAA adopted a neutral position in respect of the stay application, whereas daa opposed it. On 4 November 2024, the High Court granted the stay, and consequently the seat cap coordination parameter was inoperative for S25.

4.12 In December 2024, the High Court then decided to refer three questions to the Court of Justice of the European Union, on the basis that it would not be possible to resolve the W24 and S25 proceedings without a ruling on various questions of interpretation and application in relation to the Slot Regulation. The three questions referred are:

1. Can a national competent authority undertaking the exercise of determining the parameters for slot allocation at a coordinated airport under Article 6(1) of Regulation 95/93 (as amended) take into account development consents granted by the relevant planning authority under the national planning code in respect of that airport which impose conditions providing inter alia that the "combined capacity" of the airport terminals shall not exceed a certain annual limit of passengers, and in respect of which the stated reason for the imposition of the conditions was "Having regard to the policies and objectives of the Dublin Airport Local Area Plan and the capacity constraints (transportation) at the eastern campus"? Are such conditions a "relevant technical, operational or environmental constraint" within the meaning of Article 6(1)? Do they form part of the objective analysis of the capacity situation at the airport for the purposes of Article 6(1)?
2. If the answer to question 1 is yes, does Article 6(1) of Regulation 95/93, and insofar as relevant Articles 16 and 17 of the Charter of Fundamental Rights of the European Union, permit Member States to make a determination of the parameters for slot allocation at a coordinated airport

for a particular scheduling period which results in the non-allocation of some series of slots (or certain components thereof) to which air carriers would otherwise be entitled in accordance with the terms of Article 8(2)?

3. If this arises for consideration strictly as a result of the Court's answers to questions 1 and 2, does the Slot Regulation prohibit Airport Management Bodies within the meaning of the Slot Regulation from taking unilateral action to close the airport for a period of time, for the purpose of preventing the operation of slots which have been allocated by the Airport Coordinator so as to avoid a breach of an annual limit of passengers of the type mentioned in Question 1?

4.13 On 12 February 2026, the Advocate General published his opinion.¹³ The Advocate General's opinion is not binding on the Court of Justice. It is the role of the Advocate General to propose to the Court, in complete independence, a legal solution to the cases for which they are responsible. The judgement of the CJEU has not yet been handed down.

4.14 In the meantime, on 11 February 2025, Ryanair wrote to the parties involved in the W24 and S25 proceedings proposing that, pending the delivery of the CJEU ruling on the questions referred and the determination of the proceedings by the High Court, the IAA should not take account of the 32mppa Conditions in setting coordination parameters. Aer Lingus and the A4A parties agreed with the Ryanair proposal. The IAA adopted a neutral position. IAA outlined its opposition to the proposal. The order ultimately sought by the airlines was as follows:

"That the Respondent shall not, pending the determination of these proceedings and the related High Court proceedings bearing Record Numbers 2024/920JR; 2024/927JR; 2024/928JR; 2024/1296JR and 2024/1299JR (the "Proceedings"), take account of Condition 3 of planning permission F06A/1248 (An Bord Pleanála Reg. Ref. PL06F.220670) or Condition 2 of Planning Permission F06A/1843 (An Bord Pleanála Reg. Ref. PL06f.22346) (the "32mppa Conditions"), for the purposes of setting coordination parameters or otherwise in respect of the Respondent's functions performed under Council Regulation (EEC) No 95/93 of 18 January 1993 on common rules for allocation of slots at Community Airports, as amended."

4.15 Following a hearing before the High Court on 28 March 2025, on 2 April 2025 the High Court delivered judgement:

"In the premises, I intend to grant an interlocutory injunction pursuant to Order 84, rule 20(8)(b) of the Rules of the Superior Courts in the terms sought by the airlines. That order will remain in place pending the determination of these proceedings by the High Court. I will provide that the parties will have liberty to apply to amend vary or discharge that order on 72 hours' notice in the event of any material change in circumstances."

4.16 In those circumstances, the IAA did not take account of the 32mppa Conditions in the Draft Decision, and consequently did not propose to include a seasonal seat cap coordination parameter for W26.

Draft Decision on Terminal Coordination Parameters

4.17 We proposed to roll-forward the W25 arrivals PTB hourly limits for both Terminal 1 and Terminal 2. We noted there was no objection or alternative proposal forthcoming from the Coordination Committee. We also proposed to adopt the increased Terminal 1 and Terminal

¹³ https://infocuria.curia.europa.eu/tabs/jurisprudence?sort=DOC_DATE-DESC&searchTerm=%22C-857%2F24%22&publishedId=C-857%2F24

2 departures hourly limits proposed by Dublin Airport.

- 4.18 We noted that the methodology for the calculation of the uplifted Terminal 1 and Terminal 2 departures parameters, as set out by Dublin Airport in its presentation to the Coordination Committee, is consistent in principle with how the IAA has previously assessed security processor capacity. We also noted there was no objection to the methodology by any member of the Coordination Committee. We noted our proposal to adopt the uplifted Terminal 1 and Terminal 2 PTB departures hourly limits is in line with the majority advice of the Coordination Committee.
- 4.19 We also proposed to adopt the US Preclearance hourly passenger processing limit for the W26 season. The justification for this decision was similar to our decision in respect of the revised Terminal 1 and 2 departure PTB hourly limits. We stated our satisfaction that the proposed parameter had been estimated in a reasonable manner. We noted that the W26 Wishlist demand fits within the proposed W26 parameter.
- 4.20 We proposed to retain the referral parameter for Terminal 2 check-in desks 1-28, where demand exceeds 28 desks.
- 4.21 We noted that, as outlined above, the IAA is enjoined from taking account of the 32mppa Conditions, whether by imposing a seasonal seat cap coordination parameter or otherwise.
- 4.22 In summary, we therefore proposed the following with respect to the PTB parameters:
- We proposed to roll the Terminal 1 and Terminal 2 PTB arrivals hourly limits forward from W25, while increasing the Terminal 1 and Terminal 2 hourly departures limits as a result of the increased security capacity provided by the full implementation of C3.
 - We proposed to introduce a US Preclearance hourly passenger processing limit in line with the Dublin Airport proposal.
 - We proposed to retain the referral parameter for Terminal 2 check-in desks 1-28, where demand exceeds 28 desks.

Responses to Draft Decision

- 4.23 Aer Lingus is supportive of the proposed parameters.
- 4.24 Ryanair states its support for the additional terminal capacity proposed in the draft decision. It is also supportive of the IAA not taking the 32mppa into account in light of the High Court injunction in the judicial review proceedings.
- 4.25 SMTW submits that the Draft Decision treats the injunction as static and enduring for the full W26 season, despite the AG's Opinion and, SMTW suggests, the likelihood of a CJEU judgment before the season begins. It states that this assumption is no longer tenable as, while non-binding, the AG's Opinion is followed by the CJEU in the majority of cases. If the CJEU judgment is in agreement with the AG's Opinion, it states, the legal basis for the injunction is materially weakened, the injunction may be lifted, varied or rendered unsustainable, and the IAA's legal obligation to take the 32mppa conditions into account would be *'immediate'*.
- 4.26 SMTW states that the IAA has made no contingent provision for a change in legal circumstances, contrary to Article 6(1) of the Slot Regulation, which considers consideration of "any change thereto", and contains no conditionality tied to the outcome of the CJEU case, nor has it reserved the right to reopen or amend the W26 parameters, nor signal how slot

allocation would be dealt with if the cap becomes operable midseason.

- 4.27 It also submits that the issuing of new slots while the High Court stay remains in force risks regulatory confusion and legal challenges as airlines may claim historic rights to operate new slots allocated during the legal uncertainty, and this position undermines the integrity of the slot coordination system and exposes the process to future disputes and creates a misalignment between regulatory intent and operational planning.
- 4.28 SMTW states that the 32mppa Conditions are an Operating Restrictions under the 2014 Regulation, as they limit access to or reduce operational capacity of Dublin Airport and affect the noise climate. Any administrative act which undermines, circumvents, or materially alters the effect of the 32mppa Conditions without a fresh ANCA Regulatory Decision risks acting ultra vires, given ANCA's exclusive competence over operating restrictions under the 2019 Act.
- 4.29 The McDonnell family further submit that capacity is being increased without clarity on how that capacity will be supported in practice, and state one of the rationales for the passenger cap at Dublin Airport was limited surface access. They submit this creates continued long-term uncertainty for residents and the potential for future road impacts on their land and homes.

Final Decision

- 4.30 As outlined in the Draft Decision, the IAA is currently enjoined from taking account of the 32mppa Conditions when determining coordination parameters, or otherwise in relation to carrying out our functions under the Slot Regulation. The IAA is currently determining the coordination parameters for W26, as it required to do by the Slot Regulation. Consequently, the IAA is bound to determine the coordination parameters for W26 without taking account of the 32mppa Conditions. In that regard, when deciding to grant the injunction, the High Court was fully aware of the timelines and processes involved in determining coordination parameters; as set out by the Court, the order is to remain in place pending the determination of the proceedings. We note that the phrase 'changes thereto' refers to changes relative to the previous corresponding scheduling season.
- 4.31 In the event that the injunction were to be lifted while the 32mppa Conditions remained in effect, we would expect to consider this issue again on a prospective basis, ahead of the subsequent coordination parameters decision. We agree with SMTW that the determination of coordination parameters is a forward-looking assessment (as we have outlined in Section 2, and in previous decisions). For that reason, it may also be necessary to consider whether the 32mppa Conditions are likely to be a relevant constraint in the future season in question. In that regard, we note that legislation is currently being progressed which would empower the Minister to revoke (or amend) the 32mppa Conditions.¹⁴
- 4.32 The situation may also depend on the precise nature of the judgement handed down by the CJEU and/or the High Court, and/or developments in the 32mppa Conditions enforcement proceedings.¹⁵ While it is the responsibility of daa to comply with planning conditions contained in daa's planning permissions, daa's own position is that it cannot comply with an annual passenger cap planning condition, as most recently reiterated to STMW in daa's letter of 16 February 2026 to STMW's solicitors. While the judgement of the CJEU is awaited, the AG's opinion on the third question referred appears to have cast some doubt over the ability

¹⁴ <https://www.gov.ie/en/department-of-transport/publications/general-scheme-for-the-dublin-airport-passenger-capacity-bill-2026/>

¹⁵ daa v Fingal County Council, High Court Record Number 2025 / 1241 JR

of daa to comply with the 32mppa Conditions, at least in certain circumstances.

4.33 In that regard, in the 32mppa Conditions enforcement proceedings, the High Court has made an order to the effect that, following the judgement of the CJEU, the Court will hear from the parties and consider what steps are reasonably and lawfully open to daa to comply with the 32mppa Conditions, and what reasonable time period ought to be allowed to daa in order to take any such steps. We note that the IAA has previously taken account of the 32mppa Conditions on the presumption that they are valid planning conditions, and so any developments in that regard arising from the 32mppa Conditions enforcement proceedings may also be relevant in relation to whether or not they will amount to such a constraint in the future.

5. Appendix : Winter 2026 Coordination Parameters

The Irish Aviation Authority has determined the following scheduling limits for the Winter 2026 season at Dublin Airport.

Runway Scheduling Parameters:

Runway Hourly Limits			
Time UTC	Arrival Limit	Departure Limit	Total Limit
0000	23	23	32
0100	23	23	32
0200	23	23	32
0300	23	23	32
0400	23	23	32
0500	23	25	32
0600	23	35	40
0700	21	39	52
0800	31	24	51
0900	29	25	49
1000	27	28	50
1100	30	28	54
1200	28	29	53
1300	28	28	51
1400	30	25	52
1500	23	31	47
1600	24	29	49
1700	29	28	52
1800	26	32	51
1900	24	25	40
2000	25	24	43
2100	32	23	43
2200	32	23	42
2300	23	23	32
Totals	623	639	1043

Maximum number of movements per 10-minute period – Dual runway operations

Maximum Total	13
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Maximum Arrivals	6
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Maximum Departures	7
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Maximum number of movements per 10-minute period – Single runway operations

Maximum Total	9
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Maximum Arrivals	6
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Maximum Departures	6*
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*Exception: Maximum Departure Limit is 7 movements at 0600, 0610, 0620, 0630, 0640, 0650 UTC

Passenger Terminal Parameters (hourly):

	Departures Hourly Limit	Arrivals Hourly Limit	US CBP Processing Hourly Limit
Terminal 1	4,325	3,550	-
Terminal 2	3,850	3,050	1,450

Notes:

4. The hourly limit for passengers is rolled every 10-minutes.
5. Load factors of 85% are applied to Scheduled services for Terminal 1.
6. Load factors of 85% are applied to Scheduled services for Terminal 2.
7. Load factors of 90% are applied to Scheduled services for CBP.
8. Load factors of 95% are applied for Chartered services for both Terminal 1 and Terminal 2.

Stand Parameters:

	GA	Non-Turnaround		Turnaround Stands									All
		W.A.N	W.A.S	Total	5G	5H	Triangle	MRO	P1	P2	P3	P4	
Remote	8	14	22	15	12	4	6	3	-	-	-	-	62
Contact	-	-	-	-	-	-	-	22	9	11	19	9	70
All	8	14	22	15	12	4	6	25	9	11	19	9	132

Note: The table represents NBE stand capacity

Area	Constraint
Stands	Where demand for stands exceeds supply based on coordination allocation, flights to be referred to Dublin Airport for detailed assessment insofar as continues to be necessary (necessity criteria to be determined by the IAA based on the progress of the work to reduce the scope of such referrals).

Referral Parameters:

Area	Flag
T2 Check-in Desks 1-28 (T2 Operators excluding EI)	Demand exceeding 28 desks