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Director of Services

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ANCA Draft Regulatory Decision Consultation

Introduction

Airport Coordination Limited is the appointed independent slot coordinator for Dublin Airport. As required by the EU Slot Regulation, ACL manages the slot allocation process at Dublin Airport and is responding to the consultation on the basis of providing comments on the application of the proposed scheme detailed in Schedule A of the draft regulatory decision.

ACL has experience of managing similar schemes at several UK and European airports to ensure that noise limits are not exceeded whilst ensuring that airport capacity utilisation is maximised. The scheme as defined has been proved to be an effective way of managing the impact of flights at night. Managing the noise generated by each movement is directly linked to mitigating the impact on the community surrounding the airport.

The following comments and observation are in the order presented in Schedule A and not in any order of importance. They assume that the scheme, if adopted, would be partially managed by the slot coordinator as part of the slot allocation process. A number of the issues raised can be addressed through the introduction of a Local Rule which would be agreed by the Dublin Airport Coordination Committee which would detail the practical application of the scheme. An example of such a Local Rule can be found [here](#).

Part 1 – Definitions

Annual Quota Period

ACL supports the introduction of an annual limit that starts on 01 April as it closely aligns with the industry scheduling seasons. Any period that does not align with the scheduling calendar would make managing the scheme as part of the slot process practically impossible.

An annual limit allows for flexibility in how the quota can be used across the year. The annual limit will need to be allocated to each scheduling season. A provision for moving allocation between seasons to reflect varying season length is essential and can be accommodated in any Local Rule. Consideration should be given to managing the proportion of quota that can be used in any particular season should spreading the quota across the quota period is a requirement of the scheme.

Utilising the established slot process to manage the scheme will give a natural split by season on introduction due to the historic entitlement afforded to operators under Article 10(2) of the EU Slot Regulation. The slot mobility provisions of the Slot Regulation gives flexibility to move slots and therefore consideration should be given to the level of flexibility that should be given to allocated night quota to avoid unintended consequences.

EASA Noise Certification Database

ACL is supportive of using an established database for noise certification levels.

Each aircraft type has a wide range of classifications and therefore for planning purposes a set of principles should be agreed to aid the management of the scheme. Such principles may include:

- Default is the highest noise classification for each aircraft type is used for planning purposes and/or
- Operators allocated the highest noise classification for each aircraft type in their fleet and/or
- Operators allocated the noise classification based on a range of aircraft registrations to be used at Dublin Airport

A balanced approach will ensure that the quota is fully utilised and mitigate the risks of exceeding the quota limit.

Quota Count

The quota count directly relates to the noise generated. The inclusion of operations with a noise certification of less than 81 EPNdb having a zero quota count will result in no limit to the number of operations during the night period of such aircraft.

Part 2 – Noise Quota Scheme

Dispensations

ACL is supportive of dispensation for operational disruption. ACL believes that the dispensation process should be managed by the Airport Authority retrospectively.