Our Case Number: ACP-324637-26

An Coimisiún Pleanála

An Taisce
c/o Phoebe Duvall
5 Foster Place
Dublin 2

Date: 30 September 2026

Re: Minister for Transport EIAR scoping request in relation to the Dublin Airport passenger cap, Swords, County Dublin

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above-mentioned case. The contents of your submission have been noted.

If you have any queries in relation to the matter, please contact the undersigned officer of the Commission at laps@pleanala.ie.

Please quote the above-mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

MGowen

Muirin Gowen
Executive Officer
Direct Line: 01-8049323

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Muirin Gowen

From: Phoebe Duvall <Phoebe.Duvall@antaisce.org>
Sent: Tuesday 29 September 2026 16:37
To: LAPS
Subject: Ref. 324637
Attachments: 20260929-ACP-324637 Airport passenger cap removal scoping.pdf

You don't often get email from phoebe.duvall@antaisce.org. Learn why this is important

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A Chara,

Please find attached a submission from An Taisce in relation to Ref. 324637.

Best regards,

Phoebe Duvall

Senior Planning and Environmental Policy Officer
An Taisce - The National Trust for Ireland
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An Taisce is a membership-based charity
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Please note that I work Monday through Thursday.

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An Coimisiún Pleanála
64 Marlborough Street
Dublin 1

Sent by email to: laps@pleanala.ie

29th September 2026

For: Minister for Transport EIAR scoping opinion request in relation to the Dublin Airport passenger cap

A Chara,

Thank you for your letter of 16th September 2026 requesting comment from An Taisce regarding the Minister for Transport's request for an Environmental Impact Assessment Scoping Opinion in relation to the Dublin Airport passenger cap.

An Taisce recognises the role Dublin Airport plays in supporting economic activity in the country. However, the potential for emissions increases arising from lifting the passenger cap demands serious scrutiny. It is our view that the passenger cap should only be removed in a situation where alternative measures have already been put in place to reliably and demonstrably ensure that, at the very least, there is no increase in emissions as a result of cap removal.

1. Preliminary Matters and Overarching EIA Issues

As a preliminary matter, the EIAR needs to assess the planning and planning enforcement status of the passenger cap, as it has been exceeded in multiple years, and this constitutes a breach of the relevant planning permission. Serious potential issues were raised in this regard in the pre-legislative scrutiny hearings before the Joint Oireachtas Committee on Transport, and we would highlight in particular the following passage from the opening statement made by Ms. Sabrina Joyce Kemper of Wild Ireland Defence:

> *"Head 4 proposes to remove the passenger cap, which forms part of the environmental mitigation underpinning consent. Its exceeding constitutes development beyond consent, and under section 34 of the Planning and Development Act 2000, it could not be retained where an EIA, an appropriate assessment, AA, and a water framework directive assessment would have been required. Legislative removal of the cap risks regularising unauthorised development outside of the substitute consent regime. This approach is contrary to EU law. In Commission v. Ireland, the Derrybrien wind farm case, the court held that unauthorised*

breaches could not be remedied by domestic measures such as this. That circumvents EU obligations. The cap is central to live enforcement and court proceedings at the moment, and its removal risks interfering with those processes and altering multi-functional environmental safety reassessment."

The planning enforcement status of the cap needs to be resolved as a preliminary matter. It is unclear how the current process around the Proposed Order can lawfully proceed in the absence of the planning condition breach being regularised first via substitute consent. We refer An Coimisiún to Ms. Joyce Kemper's opening statement and testimony before the Oireachtas Committee for further detail on this and other overarching legal issues that should be addressed.[1]

Notwithstanding the above issue, Dublin Airport (Passenger Capacity) Act 2026, under which the Proposed Order subject to the EIA is being made, creates an entirely new procedure for this particular development. However, we would highlight this does not alter, negate, or remove any obligation under EU law including, but not limited to, those under the Environmental Impact Assessment Directive, Birds and Habitats Directives, Water Framework Directive, the Effort Sharing Regulation, the Governance Regulation, Energy Efficiency Directive, etc. Compliance with international, EU, national, and local law and policy must be clearly demonstrated in the EIAR.

All gaps in data, any uncertainties or limitations encountered, any assumptions relied upon, etc. should be detailed in the EIAR in relation to all assessment categories and all project stages.

All proposed mitigation measures must:

- be specific in detailing locations, methods, etc.;
- be quantitatively assessed in terms of their potential to demonstrably reduce adverse environmental impacts;
- be in the control of the applicant;
- not contain ambiguities or uncertainties in terms of their feasibility or impact;
- not be reliant on future consenting procedures.

Based on the documentation provided to An Taisce, the assessments already appear to be in a relatively advanced stage with preliminary conclusions drawn. We would emphasise, however, that these assessments may require significant changes, additions, etc., on foot of the scoping opinion to be issued by An Coimisiún.

We make the following comments without prejudice to our above position that the legal issues surrounding the planning status of the passenger cap must be resolved as a preliminary matter.

2. Assessment of Alternatives

The EIAR must describe reasonable alternatives and the main reasons for the option chosen, taking into account the environmental effects of the proposed development, as affirmed in Case C-461/17 *Holohan v ABP:*

"(7) For the purposes of Article 5(3) of Directive 2011/92, alternatives are main alternatives if they are capable of significantly influencing the environmental effects of the project concerned (Question 5).

[1] https://data.oireachtas.ie/ie/oireachtas/debateRecord/joint_committee_on_transport/2026-04-15/debate/mul@/main.pdf

(8) In accordance with Article 5(3)(d) of Directive 2011/92, the developer must indicate the reasons which determined the choice he made from various options available to him, in so far as those reasons relate to the environmental effects of the project and of the alternatives (Questions 6 and 7)."

The possibility to assess various reasonable alternatives *early* in project development is one of the main values, and indeed requirements, of the EIA process. It provides a comparison of options in terms of location, technologies, project options, etc., upon which to make the final decision and, if necessary, to adjust the project in its early development stages in order to minimise environmental impacts. The assessment of alternatives must demonstrably influence the eventual outcome and not merely be a tick box once a project has been formulated. The Proposed Order should therefore be determined following the assessment of alternatives, not before, as appears to be the case based on the scoping documentation sent to An Taisce.

Proper implementation of the assessment of alternatives requirement of the EIA Directive is essential for maximum public transparency, methodological rigour and legal compliance.

If the applicant's statement at paragraph 38 (Alternatives Considered) of the Scoping Opinion Request is accepted by An Coimisiún, and alternatives are restricted to differing approaches to the passenger capacity condition, then An Taisce submits that a reduced cap (lower than 32 million passengers per annum) should also be considered.

We note four proposed scenarios as described in Figure 2 of the Scoping Opinion Request (Assessment Schedules). It appears that these scenarios will be used in the assessment itself and therefore throughout all EIA categories of assessment (if this is not what is intended, we recommend the Scoping Opinion call for this). We also recommend that a reduced cap should also be considered as one of the assessment scenarios.

3. Climate and Air Quality

In order for the EIAR's climate impact assessment to be lawful, meaningful and transparent, it must take full account of the lifecycle emissions associated with the Proposed Order, including Scope 1, 2, and 3 emissions.

Aviation emissions constitute a major source of greenhouse gas (GHG) emissions from transport. As an area which is proving difficult to decarbonise, managing the growth in demand for air travel is essential to limit the negative impacts of short, medium and long-haul flights. The International Council on Clean Transportation's Airport Tracker tool[2] shows that 49.1% of flights from Dublin Airport are long-haul, representing a significant portion of the 2.59 million tonnes of CO_2 total flight emissions of passengers already coming from the airport, which represents the CO_2 emissions attributed to carrying passengers, but excludes those created by carrying cargo. The amount of total air pollution attributable to the airport is 1,246 tonnes of NOx.

The Climate section of Figure 6 of the Scoping Opinion Request does not actually detail the methodologies proposed for quantifying emissions, stating only that "*recognised carbon accounting methodologies*" would be used and "*assessed against applicable emissions trajectories, carbon budgets and international climate policy, including Ireland's carbon budgets and net zero objectives.*" It is therefore impossible to assess their proposed methodology.

[2] https://airporttracker.org/

It is acknowledged that there is significant international debate about emissions accounting for airports and airlines. However, we consider that the EIAR should quantify and assess the full emissions impact for all additional flights arising from the Proposed Order and the removal of the passenger cap. This should include emissions from the full flights, not just take-offs and landings. This should also be done regardless of whether the flight is entering or leaving Dublin Airport and regardless of whether the flights are operating internally to the EU or externally. How responsibility for those emissions is allocated likely needs to be addressed as well, but the full scale of the emissions impact at the very least needs to be quantified in the EIAR.

The aforementioned Airport Tracker tool could be used for scenario analysis by comparing the current total flight emissions of passengers from Dublin Airport (36mppa), with airports currently operating at passenger volumes which Dublin Airport is projected to reach in the coming decades. This will could assist in an analysis of different emissions trajectories and scenarios resulting from the proposed passenger cap removal and increases in aircraft movements.

The emissions impact of all other activities arising or intensifying as a result of increased passenger numbers must also be included in the climate and air quality assessments. This would include, for example, emissions resulting from increased electricity demand and increased transport to, from and at the airport (see section 4 below).

It is noted that aviation within the European Economic Area is already covered in the EU Emissions Trading Scheme (ETS). In July 2026, the European Commission proposed to expand the EU ETS for all departing flights up to 5,000km from Frankfurt airport, covering 59% of departing aviation emissions, up from 44%[3]. The decision is still pending, but if it comes into force, it may impact the Proposed Order. We recommend the Scoping Opinion require the consideration of both scenarios – where the ETS is expanded per the proposal and where it is not.

We note that the aviation sector places significant emphasis on Sustainable Aviation Fuels (SAFs) to mitigate emissions impact by 2050. However, the ability of these technologies to be scaled up and rapidly deployed within that timeframe, or to deliver the claimed emissions reductions, is highly uncertain. In general, SAFs are not climate neutral, and actual emissions vary significantly according to the type of SAF. Even in principle, SAFs do nothing to mitigate the non-CO2 climate effects of aviation. Moreover, despite industry promotion of the potential of SAFs, Europe's aviation sector has been actively lobbying the European Commission to weaken the post-2030 SAF mandate.[4]

The UN International Civil Aviation Organisation's (ICAO's) Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) is frequently posited as a mitigation measure for airport expansion and associated emissions increase from additional aircraft movements. A Transport & Environment report[5] has previously shown how implementing CORSIA did not necessarily incentivise emissions reductions within the aviation sector. They highlighted how it could make it cheaper for airlines to continue polluting by purchasing carbon offsets rather than accelerating moves to increase the share of sustainable aviation fuels in the conventional fuel mix. The costs of compliance with CORSIA were also projected to be a minor share of airlines' overall costs, a perverse incentive to continue business-as-usual aviation practices.

Consequently, in the absence of a fully expanded EU ETS scheme to account for all international flights and their emissions, increases in flights via lifting of the cap relies on regulating emissions via

[3] https://www.transportenvironment.org/articles/what-the-2026-ets-review-means-for-transport
[4] https://www.reuters.com/sustainability/european-airlines-take-aim-synthetic-green-jet-fuel-rules-2026-03-17/
[5] Briefing on the assessment of ICAO's offsetting scheme. March 2021. Transport and Environment. https://www.transportenvironment.org/wp-

a questionably effective market-based international scheme which is only designed to operate until 2035. There is no guarantee that the scheme beyond that will commit to absolute emissions reduction or a lower baseline than 85% of 2019 emissions (a baseline year which was the result of aviation sector lobbying effort and succeeded in weakening the policy). Relying on CORSIA as a mitigation measure or in-built emissions reduction measure is an implicit deflection of accountability for international aviation emissions which is a recurring issue with airport expansion plans. Additionally, CORSIA only considers CO_2 emissions from aviation which account for one-third of aviation's global impact due to indirect greenhouse gases such as nitrogen oxide (NOx), and the climate impact of contrails.

These potential problems should be assessed by An Coimisiún due to such measures being proposed as mitigation or as in-built methods for emissions reduction.

3.1 Non-CO_2 Emissions

Lifting of the passenger cap is likely to increase non-CO_2 emissions, which entails significant air quality and warming impacts due to non-CO_2 climate forcing being double or triple that of CO_2. This needs to be assessed in the EIAR. As noted by the European Union Aviation Safety Agency (EASA)[6]: *"the Effective Radiative Forcing (ERF) from the sum of non-CO_2 impacts yields a net positive (warming) that accounts for more than half (66%) of aviation net forcing in 2018".*

Given the high altitudes at which aircraft operate, such effects are particularly impactful to the climate system. These impacts stem from nitrogen oxides, soot particles, oxidised sulphur and water vapour, which are insufficiently considered in airport expansion discourse, with scientific studies indicating a warming effect from these impacts.

The Global Warming Potential (GWP) measure can be utilised to quantify non-CO_2 emissions by allowing for an aggregation of non-CO_2 effects into a CO2 equivalence multiplier. This can be used in conjunction with CO_2 equivalency measures.

3.2 International Legal Context

In terms of our international climate commitments under the Paris Agreement, the legal context section of the EIAR should outline how airport expansion and associated increases in total aviation emissions aligns with Ireland's fair share contribution to reduction of global emissions, as enshrined in the principle of common but differentiated responsibilities which is contained in Article 2(2). Given Ireland's status as a high per capita emitter, being the third highest in the EU in 2022 at 14.2 tonnes of CO_2 equivalent per capita[7], and our geographic condition as an island-nation, we contribute significantly to global aviation emissions and therefore have a responsibility in terms of global equity to sharply reduce emissions. The EIAR should seek to assess the airport expansion against these equity aspects. We refer An Coimisiún to a recent report[8] by Opportunity Green and Transport & Environment which highlights how the airport will use up its entire fair share carbon budget by 2034 due to a projected 65% increase in emissions under the current expansion plan, which should be assessed in the EIAR climate impact assessment section.

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[6] European Union Aviation Safety Agency (EASA). 2020. Updated analysis of the non-CO2 effects of aviation. Directorate-General for Climate Action: European Commission. https://climate.ec.europa.eu/news-other-reads/news/updated-analysis-non-co2-effects-aviation-2020-11-24_en

[7] https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20250219-1

[8] https://opportunitygreen.org/aviation/press-releases/irelands-aviation-emissions-to-soar-as-dublin-airport-exhausts-carbon-budget/

We consider that the EIAR needs to assess the Proposed Order's consistency with Articles 2 and 4 of the Paris Agreement; and, if not, to identify what, if any, prior mitigation policies and measures would be necessary to make such an order so consistent. We recommend An Coimisiún consult with the Climate Change Advisory Council in this regard.

We would highlight that the Proposed Order and are being prepared within the context of increased international legal pressure for States to reduce harms to the climate system, as per the International Court of Justice (ICJ) Advisory Opinion issued in July 2025 on the Obligations of States with regard to climate change. This ICJ opinion has been affirmed most recently in a report on Ireland by the United Nations (UN) Special Rapporteur on the human right to a clean, healthy and sustainable environment:

> *"The International Court of Justice's (ICJ) advisory opinion on the Obligations of States with regards to climate change, rendered in July 2025 is key for clarifying and advancing Ireland's obligations on climate change. It concludes that the human right to a healthy environment is a precondition for the enjoyment of all other human rights, including the right to life and health, and that the right to a healthy environment is a result of the interdependence between human rights and the environment. The ICJ also clarified that all States have the obligation under customary international law to protect the environment and the climate system, and thus, to implement effective actions to avoid harms, including transboundary ones, related to mitigation, adaptation and restoration. It highlights that States must act with strict due diligence in relation to the environment and the climate system, derived from the high risk that harm to it can imply."*

Lifting of the Dublin Airport passenger cap is also recognised by the UN Special Rapporteur as being devoid of thorough assessment to date:

> *"Moreover, decisions such as the EU nitrates derogation, and the Government proposals for new liquefied gas infrastructure to be used as Strategic Gas Emergency Reserve, and lifting the Dublin Airport passenger cap, are yet to include adequate, comprehensive and scientifically based assessments of environmental and climate impacts. Contradicting policies and exclusion of climate and environmental considerations create uncertainty even among economic sectors, in addition to increased risks."*
>
> *...*
>
> *Recently it has been announced that the 2007 Dublin airport passenger cap of 32 million would be removed through legislation and is being taken based on intentions to increase connectivity and the economy, without considering climate impacts nor comprehensive assessment on economic growth either"*

This highlights the importance of a robust emissions assessment in the EIAR as well as robust assessment of the Proposed Order against our climate legal obligations.

3.3 Domestic Legal Context

While aviation is currently outside of the scope of the carbon budgets and sectoral emissions ceilings as prescribed by the Climate Action and Low Carbon Development Act 2015 (as amended) ("the Climate Act"), and while s.39 of the Dublin Airport (Passenger Capacity) Act 2026 disapplies the requirement for the Minister and An Coimisiún Pleanála to carry out their functions in a manner consistent with climate objectives as set out in s.15 of the Climate Act, other obligations of the Climate Act around emissions reduction are still relevant. We would highlight as an example s.3(1) of the

Climate Act on the National Climate Objective: "*The State shall, so as to reduce the extent of further global warming, pursue and achieve, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy.*"

The extent to which the removal of the passenger cap aligns with this 2050 target is questionable given the additional emissions, and requires robust assessment and the provision of a rationale outlining how 2050 climate neutrality compliance is envisaged. Despite the disapplication of s.15 of the Climate Act (which we consider sets an alarming precedent of relinquishing climate action to facilitate emissions-intensive activity and raises significant questions concerning legal compliance), overall compliance and alignment with the rest of the Climate Act still requires assessment in the EIAR.

4. Traffic and Transport

The passenger cap was enacted due to concerns around airport access, road safety, and congestion, particularly on the already grid-locked M50. It is our view that allowing expanded passenger numbers could exacerbate this, and this should be assessed and quantified in the EIAR. Any potential for emissions increases as a result of an increased level of travel to and from the airport, in terms of both passengers and staff, must be accounted for in the Climate and Air Quality assessments. Emissions from any ground operations-related transport also need to be included here.

5. Noise

Any increase in passenger numbers will likely exacerbate the impact of airplane noise, including on local residents who have long expressed serious concerns about existing levels of noise. Managing noise at the current airport capacity appears to be challenging, and it is unclear how it will be effectively mitigated if the lifting of the passenger cap and associated increase in flights goes ahead.

The EIAR should assess the projected noise levels against the objectives in the Dublin Airport Noise Action Plan 2024-2028, the Fingal County Development Plan 2023-2029, RPO 7.8 of the Regional Spatial and Economic Strategy for the Easter & Midland Region, and National Policy Objective 94 of the National Planning Framework which specifies the following:

> *"Promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life and support the aims of the Environmental Noise Regulations through Strategic Noise Maps, Noise Action Plans and national planning guidance."*

6. Human Health

The lifting of the passenger cap will lead to additional flights and road traffic, with resultant increases in air and noise pollution, including increased NO_2, PM2.5 and PM10 levels. Air and noise pollution increase the risk of cardiovascular and respiratory problems, dementia, and neonatal and maternal impacts, all of which should be covered in the EIAR's assessment of human health.

7. Economic Considerations

Any consideration of economic impacts in the EIAR (see, for example, Figure 6 on Human Health, which indicates that socio-economic effects will be studies) must take a holistic approach to assessing economic risks and benefits. This cannot only focus on tourism, employment, and other potential economic benefits. We recommend that an evidence-based analysis of outbound flights versus inbound tourism in terms of economic returns to the State is included.

Air transport demand has been found to be a response to increasing GDP per capita rather than air connectivity driving growth, which is an important distinction missing from this debate.[9] One of the implications is that economic activity leaves the country, creating losses in tourism revenue etc, and that increases in flights is the preserve of richer nations. The propensity towards flying increases sharply with income, and Ireland is no exception, being in fact privileged on the world stage given that a minority of the world's population flies, and even less fly frequently. This raises concerns for Ireland about global equity, large per capita emissions and the fair share contribution obligation under the Paris Agreement, as well as questioning assumptions of automatic economic growth arising from airport expansion.

There are also very significant economic costs associated with the impacts of climate change and with non-compliance with emissions reduction obligations which need to be taken into account. The health impacts mentioned above also have negative economic consequences that must be factored into any economic analysis.

8. Discharges and Water Quality

Increasing the number of passengers will increase aircraft movements and operations. This brings increased risk of discharges including fuel, de-icing fluids, cleaning chemicals, and any other chemicals or substances associated with aircraft operations, maintenance and servicing as well as with the use of ground operation vehicles, the operation of the airport, and ground transportation to and from the airport. The watercourses around and downstream of the airport are already degraded, and PFAS contamination linked to the airport has been identified.

An increase in passengers will also drive an increase in wastewater output and water demand. These require assessment as well.

Therefore, the EIAR's assessment of hydrology and impacts to water quality should include an assessment of the proposal against Article 4 of the Water Framework Directive (WFD), taking into account the abovementioned risks. The objectives of the WFD are to protect all high status waters, prevent further deterioration of all waters and to restore degraded surface and ground waters to good status by 2027. Specifically, where there is bad, poor or moderate water quality there is the legal imperative to bring that water body up to good status by 2027. The proposal should be assessed against Article 4 of the WFD to determine whether the project may cause a deterioration of the status of a surface or ground water body or if it may jeopardise the attainment of good surface or ground water status or of good ecological potential and good surface or ground water chemical status. To assess the proposal against Article 4, the EPA monitoring data on the water quality status indicators and Environmental Quality Standards must be used.

We would highlight that in Case C-461/13 (Weser), the CJEU held that:

> *"Article 4(1)(a)(i) to (iii) of Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy must be interpreted as meaning that the Member States are required*
>
> *— unless a derogation is granted*

[9] New Economics Foundation. 2025. The Economics of Air Transport in Europe. Part One: Air Transport and Growth. https://neweconomicsf.files.svdcdn.com/production/files/The_economics_of_air_transport_in_Europe.pdf?dm=1762964631

— to refuse authorisation for an individual project where it may cause a deterioration of the status of a body of surface water or where it jeopardises the attainment of good surface water status or of good ecological potential and good surface water chemical status by the date laid down by the directive.

The Weser case created a jurisdictional requirement and established that authorisation for a project has to be refused where there may be an adverse impact on the objectives of Article 4.

While the concept of beyond reasonable scientific doubt has been well ventilated in the courts in regard to Article 6(3) of the Habitats Directive, a similar standard of certainty is required in relation to Article 4 of the WFD. The Weser judgement highlights the stringent obligation which applies to decision making in regard to potential deterioration, with even temporary deterioration requiring a derogation, as ventilated in case C-525/20 (Association France Nature Environnement (Impacts temporaires sur les eaux de surface)).

There is also provision for the protection of water-dependent Natura 2000 sites under Article 4(1)(c) of the WFD, such as the Baldoyle SAC and SPA, which are hydrologically connected to the airport site. The EIAR should therefore evaluate if the proposal has the potential to affect the achievement of compliance with the conservation objectives of the water-dependent Natura 2000 sites listed as 'Protected areas' in the context of WFD Article 4(1).

9. Cumulative Impacts

The Scoping Opinion Request states that Chapter 21 of the EIAR *"Explains the relationship between the proposed Order and other airport development including existing approvals, live consent processes and other reasonably foreseeable future developments, and how these matters have been addressed in the EIAR."* Paragraph 36 goes on to lists relevant other projects. All of these need to be included in the cumulative impact assessment, including future projects that can reasonably be foreseen arising on foot of an increase in passenger numbers. Cumulative emissions impact assessment should look at the emissions impact of the Proposed Order in the context of our emissions reduction obligations.

We appreciate your consideration of our comments. An Taisce reserves the right to make expanded and/or additional observations on issues covered or not covered in this submission, in the Scoping Opinion Request, in the EIAR, etc. as part of future consultation periods.

Is muidne le meas,

Seán O'Callaghan
Planning and Environmental Policy Officer
An Taisce – The National Trust for Ireland

Phoebe Duvall
Senior Planning and Environmental Policy Officer
An Taisce – The National Trust for Ireland