Appendix 1-1: Application Document

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Private and Confidential
Darragh O'Brien TD
Minister for Transport
Office of the Minister for Transport
Leeson Lane
Dublin 2
D02 TR60

05 August 2026

Re: Application by daa plc to the Minister for an order to be made in accordance with section 25 of the Dublin Airport (Passenger Capacity) Act 2026 (the "Act")

Dear Minister,

daa plc hereby applies under section 7 of the Act to the Minister for a Ministerial Order to be made in accordance with section 25 to amend the existing passenger capacity conditions[1] that currently limit the combined passenger capacity of Terminal 1 and Terminal 2 at Dublin Airport to 32 million passengers per annum (mppa) (the 'Proposed Order').

daa's application is to amend the existing passenger capacity conditions by increasing the limit from 32 mppa to 40 mppa, and that this amendment would apply to Dublin Airport as a whole. Further, and in order to ensure clarity and avoid ambiguity, the enumeration of passengers as provided by the Order, would be based on the definitions of All Passengers on Board provided within Eurostat Reference Manual on Air Transport Statistics, which is the format used by daa when reporting passenger numbers to the CSO as required by the Member State under Regulation (EC) No 437/2003.

Without prejudice to daa's amendment proposal, daa acknowledges that section 7(5) allows the Minister to vary daa's proposal. If the Minister decides to vary daa's proposal to revoke the passenger capacity conditions, daa would be delighted to provide any information requested by the Minister.

The enclosed application report and supporting documentation contain the information required under the Act at this stage of the statutory process.

daa plc respectfully requests that the Minister give favourable consideration to this application and take such steps as are required under the Act to progress the statutory process.

Yours sincerely,

Nicholas Cole
Deputy Chief Executive

[1]Condition no. 3 attached to the Terminal 2 permission, ABP Ref. No. PL06F.220670 (F06A/1248), and
Condition no. 2 attached to the Terminal 1 extension permission, ABP Ref No. PL06F.223469 (F06A/1843).

An Bord Stiúrthóirí I Board of Directors: Gary Owens - Cathaoirleach/Chairman, Fred Barry, Laura Burke, Paula Cogan, Lisa Dillon, Darren Kelly, Des Mullally, Kevin O'Connell, Ger Perdisatt, MarkJames Ryan, Risteard Sheridan

Oifig Chláaithe: Trí, An Fhaiche, Lárcheantar Aerfort Bhaile Átha Cliath, Aerfort Bhai le Átha Cliath, Sord, Contae Bhaile Átha Cliath, K67 X4X5. Uimhir Chláraithe: 9401 Éire Registered Office: THREE The Green, Dublin Airport Central, Dublin Airport, Swords, Co Dublin, K67 X4X5. Registered Number: 9401 Ireland

Application made pursuant to the Dublin Airport (Passenger Capacity) Act 2026 for a Ministerial Order relating to the Passenger Capacity Conditions at Dublin Airport

APPLICATION REPORT

AUGUST 2026

daa



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Executive Summary

daa plc ('daa') hereby applies for the making of a Ministerial Order under the Dublin Airport (Passenger Capacity) Act 2026 (the Act) amending the existing passenger capacity conditions that currently limit the combined passenger capacity of Terminal 1 and Terminal 2 at Dublin Airport to 32 million passengers per annum (mppa). daa's application is to amend the existing passenger capacity conditions by increasing the limit from 32 mppa to 40 mppa and clarifying that this limit applies to Dublin Airport as a whole. (the 'Proposed Order').

The existing passenger capacity conditions are:

- Condition no. 3 attached to the Terminal 2 permission, ABP Ref. No. PL06F.220670 (F06A/1248), and
- Condition no. 2 attached to the Terminal 1 extension permission, ABP Ref No. PL06F.223469 (F06A/1843).

The existing passenger capacity conditions were imposed in 2007 and 2008 in a materially different planning, operational and transport context. Since that time, Dublin Airport has experienced significant growth, substantial infrastructure investment has taken place, and the wider regulatory framework governing airport operations, aircraft noise, environmental assessment and slot allocation has evolved considerably.

daa's view is that passenger capacity limits are a crude, and not the most appropriate, means of controlling the effects of airport growth. Notwithstanding this, daa's application is for the amendment of the passenger capacity conditions, and it makes the application on this basis.

If the Minister decides to amend these conditions, this would have the practical effect of ensuring that the Airport can increase its activity to meet passenger demand in the short term, and to realise its potential as the principal international gateway for trade, inward investment and tourism in Ireland. The application does not relate to or permit any physical development, airport infrastructure works, changes to the airport layout, aircraft noise operating restrictions, or other consent outside the statutory mechanism established by the Act.

The need to address the existing passenger capacity conditions, and the requirement for expedient Ministerial Action, is urgent. If the Court of Justice of the European Union in Case C-857/24[1] adopts the position taken by the Advocate General in his opinion delivered on 12 February 2026, the IAA may be required to take account of the existing passenger capacity conditions when declaring capacity at Dublin Airport. The IAA may be required to do so as early as October 2026, when determining capacity for the Summer 2027 season. That would result in the reduction of approximately 4.4mppa (aviation count passengers) versus 2025 and almost certainly a larger reduction again versus 2026, if the existing passenger capacity conditions are not amended.

Dublin Airport is the State's primary international gateway and a critical element of national infrastructure. The continued existence and application of the existing passenger capacity conditions risks constraining international connectivity, passenger travel, tourism, trade, investment, national competitiveness, economic growth, labour mobility and wider State interests. The economic assessment accompanying this application (Appendix III) demonstrates the potential for extremely significant economic and social harm if the passenger capacity conditions of 32 mppa remain in place and are given effect to in the light of the pending CJEU Judgment, including substantial foregone employment and Gross Value Added, together with adverse impacts on tourism, connectivity and

[1] Case C-857/24 concerns a preliminary reference to the CJEU arising from six related High Court judicial review proceedings (further detail at 2.4 below) in which daa is a party and in which the passenger capacity conditions are the central issue.

national competitiveness. In particular significant numbers of the population will not be able to avail of air travel and the cost of the same for those who do travel will be significantly increased.

This Application Report and the environmental assessments underway, have been prepared by reference to the operational scenario of 40 million passengers per annum (mppa), calculated on an "aviation count" basis, as per the methodology explained in section 1.5 below, Manner of Amendment.

The information required under section 7(2) of the Act is enclosed, namely on the specific characteristics of daa's proposal, including its location, its technical capacity and its likely impact on the environment. Preparation of the environmental assessment reports, including Environmental Impact Assessment Report (EIAR), the Natura Impact Statement (NIS) and Water Framework Directive (WFD) Assessment (the 'environmental assessment reports'), is underway and at an advanced stage. While the assessments underlying the reports remain subject to finalisation, the work completed to date indicates that the likely environmental effects of the Proposed Order can be identified, described and assessed using recognised methodologies and a consistent assessment framework. Key findings can be summarised as:

- **Environmental Impact Assessment (EIA):** As a matter of European law, because the making of the Proposed Order would not involve any works or other interventions involving alterations to the physical aspect of Dublin Airport, it is not a "project" within the meaning and scope of the EIA Directive and is not therefore subject to the assessment obligations of that Directive. In this regard, reference is made to the judgments of the CJEU in *Pro-Braine* (Case C-121/11) and *Brussels Airport* (Case C-275/09), as well as to the recent decision of the High Court in *Hession v An Coimisiún Pleanála* [2026] IEHC 355 which applies those judgments. The *Brussels Airport* case states "*As the Advocate General points out at point 28 of his Opinion, while it is established case-law that the scope of Directive 85/337 is wide and its purpose very broad … a purposive interpretation of the directive cannot, in any event, disregard the clearly expressed intention of the legislature of the European Union"*[2]

  Under European law, this application cannot be screened in for EIA. The European Commission's Guidance on Screening states that:

  > *"The EIA Directive applies to the assessment of the environmental impacts of those public and private Projects that are likely to have significant effects on the environment. Article 1(2) of the Directive defines 'Project' as: 'the execution of construction works or of other installations or schemes, other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources.' The jurisprudence of the CJEU provides a broad interpretation of the concept of 'Project' (see Case C-72/95, Kraaijeveld and others and the box below).*
  >
  > *Box 6: The concept of a 'Project'*
  >
  > *For example, the Court has held that the renewal of an existing permit (to operate an airport) cannot, in the absence of any works or interventions involving alterations to the site's physical aspects, be classified as a 'Project' (Case C-275/09, Brussels Hoofdstedelijk Gewest and others, paragraph 24; Case C-121/11, Pro-Braine and Others, paragraph 31)".*[3]

  It was held in *Hession* that relevant legal principles regarding EIA include that *"EIA only applies to physical interventions not changes of use – "renewal of an existing permit (to operate an airport) cannot, in the absence of any works or interventions involving alterations to the site's physical aspects, be classified as a 'Project' (Case C-275/09, Brussels Hoofdstedelijk Gewest*

[2] Case C-275/09 paragraph 29

[3] Section 2.3, European Commission, Environmental Impact Assessment of Projects, Guidance on Screening, 2017

and others, paragraph 24; Case C-121/11, Pro-Braine and Others, paragraph 31)" (Environmental Impact Assessment of Projects - Guidance on Screening (Directive 2011/92/EU as amended by 2014/52/EU) (European Union, 2017)".[4]

However, in circumstances where the Dublin Airport (Passenger Capacity) Act 2026 empowers the Minister to direct daa to provide information for the purposes of the conduct of an EIA and provides that daa is obliged to comply with any such direction, this report has been prepared in discharge of that domestic statutory obligation. It is however prepared and furnished to the Minister without prejudice to daa's position that the subject matter of the Proposed Order does not constitute a "project" within the meaning and scope of the EIA Directive.

As noted above, the environmental assessments are at an advanced stage. Based on the work completed to date, no likely significant adverse residual environmental effects have been identified. Beneficial effects have been identified in relation to employment, economic activity and tourism. Across the remaining environmental topics, effects are either not significant or can be appropriately managed through existing operational measures, airport infrastructure, environmental-management procedures and statutory regulatory controls.

- **Appropriate Assessment (AA):** The Natura Impact Assessment undertaken to date indicates that, having regard to the continuation of existing operational controls and established environmental-management measures, the Proposed Order would not adversely affect the integrity of any European site, either alone or in combination with other plans or projects, in view of the conservation objectives of those sites.

- **Water Framework Directive (WFD):** The WFD Assessment undertaken to date indicates that the Proposed Order would not cause deterioration in the status of any surface water or groundwater body and would not prevent the achievement of Water Framework Directive objectives. This conclusion is based on existing operational pollution controls, drainage infrastructure and operational water-management measures.

Technical-capacity evidence prepared by Ricondo concludes that the existing airport infrastructure, facilities and operational systems are capable of accommodating the assessed operational scenario. The assessment was undertaken using recognised International Air Transport Association (IATA) Airport Development Reference Manual methodologies and identifies sufficient capacity across all major airport functions to accommodate the assessed level of activity.

A detailed Traffic and Transport Assessment has been undertaken to assess the effects of the 40 mppa operational scenario on the surrounding transport network. The assessment considers forecast changes in airport-related traffic, the operation of the surrounding road network, public transport provision and committed transport infrastructure. It concludes that the transport impacts associated with the Proposed Order can be accommodated through the existing and committed transport network and meet the Key Performance Indicators agreed with relevant stakeholders in the airport's established Surface Access Monitoring Framework. The Framework provides a mechanism for regular and active monitoring of surface access including passenger car mode share, staff car mode share, and volume of traffic and allows for early intervention through mitigation measures if KPIs are not met.

daa trusts that this application provides a sufficient basis for the Minister to issue a notice under section 7(5) of the Act of his intention to accept or vary daa's proposal and to make an order under section 25(1) to amend the existing passenger capacity conditions.

[4] *Hession v An Coimisiún Pleanála* [2026] IEHC 355, paragraph 59

Chapter 1: Introduction & Proposed Order

1.1 Introduction

The information contained in this Application Report comprehensively sets out the details required under section 7(2) of the Act in support of daa's application to amend the existing passenger capacity conditions. Appendix I provides a tabulated compliance schedule cross-referencing each requirement of the Act to the relevant sections of this report.

The report identifies the Proposed Order, sets out the reasons and justification for the application, describes the operational scenario and technical-capacity assumptions relied upon, and presents the likely impact of the Proposed Order on the environment. These matters are addressed principally in Chapters 1, 3, 4 and 5.

The information has been prepared to enable the Minister to consider daa's proposal, form an intention and issue a notice under section 7(5) of the Act. daa considers that the information provided is sufficient for that purpose.

1.2 Proposed Order

daa seeks the making of a Ministerial Order to amend the two existing planning conditions restricting the combined passenger capacity of Terminal 1 and Terminal 2 at Dublin Airport by increasing the limit from 32 mppa to 40 mppa (the Proposed Order).

For the purposes of the Act, a "passenger capacity condition" is defined as a condition relating to the number of passengers that may use Dublin Airport for the purpose of travelling by air to or from another airport in any period.

The passenger capacity conditions proposed to be amended are:

> **Terminal 2 Parent Permission** (ABP Ref. PL06F.220670 (F06A/1248)); Granted 29/08/2007
>
> *Condition No. 3: 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.*
> *Reason: Having regard to the policies and objectives of the Dublin Airport Local Area Plan and capacity constraints (transportation) at the eastern campus.*
>
> **Terminal 1 Extension Permission** (ABP Ref. PL06F.223469 (F06A/1843)); Granted 10/01/2008
>
> *Condition No. 2: 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 a further grant of planning permission.*
> *Reason: Having regard to the policies and objectives of the Dublin Airport Local Area Plan and capacity constraints (transportation) at the eastern campus.*

Conditions 3 and 2, as detailed above, are "passenger capacity conditions" within the meaning of the Act and are the passenger capacity conditions to which the Proposed Order relates.

1.3 Amendment

The Proposed Order would amend the existing passenger capacity conditions.

daa seeks amendment, notwithstanding that it recognises that the continued operation of a fixed annual passenger-number condition is an ineffective mechanism for regulating airport activity at Dublin Airport.

daa does not have control over flight activity at Dublin Airport, or indeed the public demand for flights, which is continually increasing in a thriving economy. Passenger capacity limits inconsistent with actual

capacity result in sub-optimal use of economically and socially critical infrastructure and impose an arbitrary limit on people's freedom of movement. However, an amendment of the existing passenger capacity conditions will facilitate operation of the airport at an increased capacity of 40 mppa.

1.4 Nature of the Proposed Order

The Proposed Order relates to the amendment of the existing passenger capacity conditions from 32 mppa to 40 mppa.

Amendment of the existing passenger capacity conditions would not displace all of the other separate statutory and regulatory controls that apply to airport activity. Where the Act permits conditions or requirements to be attached to the Ministerial Order, those measures may be reflected in the Order.

The Proposed Order does not relate to or authorise any physical development, infrastructure works, changes to the airport layout, aircraft noise operating restrictions, or other consent outside the statutory mechanism established by the Act. Any uplift in airport activity will be accommodated utilising existing airport infrastructure.

1.5 Manner of Amendment

The manner of the amendment proposed by daa is that the Minister would amend the existing passenger capacity conditions to 40mppa and clarify that this amended passenger capacity applies to Dublin Airport as a whole, not just the "*Terminals*".

Further, and in order to ensure clarity and avoid ambiguity, the enumeration of passengers as provided by the Order, would be based on the definitions of All Passengers on Board provided within Eurostat Reference Manual on Air Transport Statistics, which is the format used by daa when reporting passenger numbers to the CSO as required by the Member state under Regulation (EC) No 437/2003. The definition is as follows:

> ***All Passengers on Board***
> *All passengers on board of the aircraft upon landing at the reporting airport or at taking off from the reporting airport. All revenue and non-revenue passengers on board an aircraft during a Flight Stage. Includes direct transit passengers (see definition 1.5.3) (counted at arrivals and departures).*
>
> *Direct transit passengers as Passengers who, after a short stop, continue their journey on the same aircraft on a flight having the same flight number as the flight on which they arrive. In order to appropriately reflect the level of activity at an airport, direct transit passengers are counted only once. Passengers who change aircraft because of technical problems but continue on a flight with the same flight number are counted as direct transit passengers.*

1.6 Chapter Conclusion and Next Steps

daa is discharging its role as applicant and recognises that it is the Minister's role to accept, vary or refuse daa's proposal.

Chapter 1 identifies the Proposed Order and explains the proposed manner of amendment.

daa considers that the information contained in this report satisfies the requirements of sections 7(2) and 12(2) of the Act. Chapter 5 summarises the environmental information, and explains the operational assumptions informing the EIAR, NIS and WFD assessments to be submitted to ACP.

The information presented in this report is not intended to substitute for the final EIAR, NIS or WFD assessment and does not prejudge their outcome.

Chapter 2: The Existing Passenger Capacity Conditions

2.1 Introduction

This chapter explains the background to the existing passenger capacity conditions. It addresses the origin, purpose and operation of the conditions; the planning history and dynamic airport-campus context; and current passenger demand, and the reasons why passenger throughput is not within daa's control.

The purpose of the chapter is not to revisit the merits of the historic planning decisions by which the existing passenger capacity conditions were imposed. Rather, it is to explain the present context in which these historic conditions fall to be considered, including current passenger throughput above 32 mppa, the ongoing enforcement, court and regulatory processes, and the operational and planning uncertainty associated with the conditions.

2.2 Origin, Purpose and Operation of the Existing Passenger Capacity Conditions

As identified in section 1.2, the existing passenger capacity conditions were first imposed by then An Bord Pleanála (ABP) as a condition attached to the grant of permission for Terminal 2 in 2007. This condition was substantially replicated five months later, in a permission to extend Terminal 1. In both cases, the stated reasons for attaching the conditions, being *"having regard to the policies and objectives of the Dublin Airport Local Area Plan and capacity constraints (transportation) at the eastern campus."*

In 2005, Dublin Airport was handling approximately 18 mppa. The Environmental Impact Statement (EIS) accompanying the Terminal 2 application identified this figure as the baseline passenger throughput for the assessment. It also assessed a long-term passenger forecast of 30 mppa by 2015/2016 and an operating capacity of 35 mppa. Against that baseline, the existing 32 mppa passenger capacity conditions represented an uplift of approximately 74% above then-current passenger throughput.

In this context, the conditions represented a forward-looking capacity horizon, materially above then-current passenger throughput of 18 mppa. They were set by reference to a planning and transport context in which significant future surface-access interventions were then envisaged, including Metro North and the upgrade of the M50 and R132. The wider pattern of airport development, including the future relationship between the eastern and western airport campuses, was also still evolving.

Given that the 32 mppa threshold was materially above then-current passenger throughput in 2007, it did not present an immediate practical constraint on airport operations. However, the existing passenger capacity conditions are now acting as a restriction on growth and are now no longer appropriate in an evolved planning context.

For the purposes of the Proposed Order, the conditions must now be understood against the present circumstances, and in the context of the national economic, reputational and social implications were they to be brought into effect.

2.3 Dynamic Airport-Campus Context

The planning context within which Dublin Airport operates has evolved materially in the almost 20 years since the existing passenger capacity conditions were imposed.

Key changes include the construction and opening of both Terminal 2 and the North Runway; the development of an aircraft noise regulatory framework following adoption of EU Regulation 2014/598 and transposition in 2019 into Irish Law; and, the lodgement to Fingal County Council of the Infrastructure Application (IA) (F23A/0781) seeking permission for 11 airport infrastructure projects (Project Elements) and an amendment of the 32mppa threshold to 40mppa. The IA is currently under consideration by Fingal County Council (FCC) and has been the subject of a Draft Regulatory Decision (Draft RD) dated 28th May 2026, issued by the Aircraft Noise Competent Authority (ANCA).

The North Runway Relevant Action (NRRA) (ABP Ref: ABP-314485-22 (F20A/0668)) is a particularly relevant component of the airport operational context, as it concerns key parameters within which the airport runway system is used at night. The NRRA remains subject to separate legal and regulatory processes, including matters discussed later in this report. It is relevant to the Proposed Order as it informs assumptions used in the environmental assessments, including hours of operation of the North Runway, and the use of a noise quota system for managing nighttime aircraft noise.

Other recent planning decisions and development proposals illustrate the continuing evolution of the Dublin Airport campus, including:

- **Underpass of Runway** 16/34 (granted in April 2024) which will facilitate safe and efficient access between the eastern and western campuses. Construction is underway and completion is expected in Q3, 2030.
- **Airfield Drainage Project** (granted in June 2026) representing a significant investment in drainage and supporting infrastructure to enhance operational resilience. Construction is expected to commence in Q1, 2027, with a target 36-month construction programme.
- **Customs and Border Protection Facility** (granted in May 2025) a strategically important project supporting transatlantic connectivity and reinforcing Dublin Airport's role as a key international gateway and hub airport. A further application is proposed shortly to enhance the approved development. Depending on the outcome of that application, construction could start as early as Q3, 2027.
- **Solar PV I** (granted in December 2022) A solar farm to the south of Dublin Airport, supporting energy resilience, sustainability objectives and the transition to lower-carbon airport operations. This facility became operational in late 2024. A second phase of investment in solar energy, this time to the northeast of the airport, is currently under consideration by FCC, with a decision expected shortly.
- **Bellyhold Cargo Relocation:** FCC is actively considering an application to relocate belly-hold cargo operators from the South Apron to a site to the east of the R132. daa expects to submit a response to a request for further information to FCC shortly, with a second phase proposals anticipated to be lodged with them before the end of the 2026.

This dynamic planning and regulatory context are relevant to the Proposed Order as it forms part of the existing and evolving airport baseline, informs operational assumptions and provides important factual details to be considered in the cumulative assessments underway.

The Proposed Order does not displace those separate processes or controls. It would amend the existing passenger capacity conditions only, other consents, permissions, regulatory decisions and statutory controls would continue to apply in accordance with their own legal frameworks.

2.4 Passenger Demand, Limits on daa Control and Steps taken by daa to seek compliance

Passenger Demand

Passenger demand at Dublin Airport has recovered strongly following the Covid-19 period and now exceeds the permitted 32 mppa level. Passenger throughput reached approximately 33.5 mppa in 2023, approximately 34.6 mppa in 2024 and approximately 36.4 mppa in 2025.

Existing and forecast demand demonstrates that the existing passenger capacity conditions are no longer theoretical or remote and are limiting growth at Dublin Airport.

Current status of existing passenger capacity conditions

The existing passenger capacity conditions are the subject of a High Court stay order (the "High Court Stay") made by the High Court on 2 April 2025 and which remains in effect. The High Court Stay provides that the IAA *"shall not, pending the determination of [six sets of related judicial review proceedings, detailed below, concerning the IAA's capacity declarations for the Winter 2024 and Summer 2025 seasons] take account of [the existing passenger capacity conditions] for the purpose of setting coordination parameters"*. However, in the event that the European Court holds that the IAA is required to take account of the 32mppa conditions and the High Court Stay is ultimately lifted, the IAA may then be required to take the existing passenger capacity conditions into account when determining capacity under the Slot Regulation and limit annual passenger throughput to 32mppa. The IAA doing so would reduce the annual number of passengers by 4.4mppa versus 2025 and almost certainly by a larger reduction again versus 2026.

IAA Control

Passenger throughput is an annual outcome which is influenced by the combined effect of IAA capacity determinations, passenger demand, airline scheduling, seat capacity, route decisions, load factors, airport operational capacity and slot allocation. While daa owns and operates Dublin Airport, it cannot do anything to control annual passenger throughput.

Dublin Airport is a coordinated airport under the EU Slot Regulation. In Ireland, the role of determining the capacity of Dublin Airport through the setting coordination parameters has been exclusively assigned to the IAA. daa has no role whatsoever in determining capacity under the EU Slot Regulation.

The IAA is responsible for declaring the operational capacity available for slot allocation, while Airport Coordination Limited (ACL) independently allocates slots to airlines. As explained further in Appendix II, daa does not control either of these functions. Accordingly, passenger throughput cannot be managed by daa. daa's position - and that of the IAA - is that conditions attached to development consents, including the existing passenger capacity conditions, are a relevant constraint for the purposes of the Slot Regulation of which account must be taken by the IAA when determining capacity.

daa cannot determine the number of passengers who choose to travel, the routes operated by airlines, the aircraft capacity deployed by airlines, the load factors achieved on those services, or the allocation of slots.

The existing passenger capacity conditions are also the subject of ongoing enforcement, court and regulatory processes. Those processes form part of the wider context in which the conditions may be required to be taken into account by the IAA in declaring airport capacity in future, if not amended. This is considered further in section 3.2 and Appendix II.

Steps taken by daa – planning and other

daa has taken all steps available to it to seek compliance with the existing passenger capacity conditions and to seek to change those conditions through the planning system. Effectiveness of these

steps was hampered by the delayed implementation of Regulation (EU) 598/2014, the time taken to establish the Aircraft Noise Competent Authority (ANCA) and related statutory processes[5], the Covid-19 pandemic and the unexpectedly rapid recovery in passenger demand from late 2023 onwards. Notwithstanding this, the principal measures pursued by daa included:

- the September 2019 application to increase terminal capacity to 35 mppa. However, that application was subsequently withdrawn in 2020 in the context of the Covid-19 pandemic and the collapse of air travel;
- the Infrastructure Application lodged in December 2023 seeking permission for airport infrastructure to support operation at 40 mppa and which remains with Fingal County Council almost three years later;
- the Operational Application submitted in December 2024 and supplemented in February 2025 seeking an increase in the passenger limit to 36 mppa. However, daa subsequently decided not to progress the application including because of Fingal County Council's Request for Further Information which purported to direct daa to revise its application to include physical works and to submit an EIAR, contrary to the European Union law set out above; and
- other operational and regulatory measures aimed at facilitating compliance with the existing passenger capacity conditions in 2024, which included:
  - (i) the discontinuation, in May 2024, of the award of all new traffic support scheme applications as allowed under the scheme's terms and conditions;
  - (ii) the introduction of a new incentive which discounts airport charges for airlines that have a current presence in Dublin Airport and incentivises these airlines to move traffic to Cork Airport; and
  - (iii) consideration of an increase in airport charges for 2024 to disincentivise travel to and from Dublin Airport. However, it was ultimately not possible to do so under the EU Airport Charges Directive, as charges were at the maximum possible level and any such increase would have placed daa beyond the 2024 price cap imposed by the then Commission for Aviation Regulation (now the IAA).
  - (iv) daa sought to identify interim solutions to address the capacity situation in 2024, pending the setting of the Winter 2024 coordination parameters, including by proposing a Local Rule under the Slot Regulation (which was rejected by the airlines).

However, the steps available to daa are limited and cannot deliver compliance with the existing passenger capacity conditions. Compliance can only be achieved by the IAA taking account of the existing passenger capacity conditions in the slot allocation process.

Steps taken by daa – court action

IAA Decision on Winter 2024 Coordination Parameters at Dublin Airport

The IAA did not reflect the existing passenger capacity conditions in its draft decision for Winter 2024. daa made submissions to the IAA regarding its draft decision with respect to the necessity to do so and proposals as to what would be required in that respect to achieve compliance in 2024.

[5] The enactment and commencement of the Aircraft Noise (Dublin Airport) Act 2019; designation of Fingal County Council as ANCA; the shift from applications being made to An Bord Pleanála/the Commission in certain cases to applications being made to the Council; the requirement for ANCA to assess whether a Noise Assessment is required; the section 34B process under the Planning and Development Act 2000; the related statutory steps for assessing noise-related operating restrictions under Regulation 598/2014.

On 7 May 2024, the IAA published the Final Decision on Winter 2024 Coordination Parameters at Dublin Airport ("**the W24 Decision**")[6]. While the W24 Decision included a PATM seat cap which was intended by the IAA to reflect the existing passenger capacity conditions, it was clear to daa that those coordination parameters would still result in a breach of the existing passenger capacity conditions. daa therefore challenged the W24 Decision[7]. Ryanair and Aer Lingus each issued their own challenges[8] in respect of the W24 Decision (the "Winter 2024 Proceedings"). Ryanair and Aer Lingus challenged the W24 Decision on the basis that the IAA should not have reflected the 32mppa Conditions in the W24 Coordination Parameters at all. daa at all times fully contested the Ryanair and Aer Lingus proceedings, and sought the earliest possible resolution of those proceedings, in an attempt to achieve compliance with the 32mppa Conditions.

IAA Final Decision on Summer 2025 Coordination Parameters at Dublin Airport

On 10 October 2024, the IAA published its decision setting Coordination Parameters for the Summer 2025 season (the "**S25 Decision**")[9], which included a Passenger Air Traffic Movement seat cap (the **"S25 PATM seat cap**"). In the S25 Decision, consistent with the submissions made by daa in the S25 Coordination Process, the IAA took account of the constraint on the capacity of Dublin Airport imposed by the existing passenger capacity conditions such that, had the S25 PATM seat cap been implemented, and had coordination parameters been set for the Winter 2025 season that also properly reflected the existing passenger capacity conditions as a calendar year constraint, compliance in 2025 would have been achievable.

However, Aer Lingus, Ryanair and Airlines for America ("A4A") challenged the Summer 2025 Decision on similar grounds to the Winter 2024 Proceedings, (the "**Summer 2025 Proceedings**")[10]. daa was named as a Notice Party to all three cases. daa at all times fully contested the proceedings, and sought the earliest possible resolution of those proceedings, in an attempt to achieve compliance with the 32mppa Conditions.

As part of the Summer 2025 Proceedings, Ryanair, Aer Lingus and A4A sought a stay on the operation of the S25 PATM seat cap. daa opposed the stay application, one of the grounds being that the grant of a stay would inevitably lead to a breach of the 32mppa Conditions in 2025. However, on 4 November 2024, the High Court delivered a judgment in which it held that the PATM seat cap element in the S25 Decision should be stayed pending the resolution of the proceedings or further order by the court.

Preliminary Reference to the European Court of Justice

On 11 December 2024, the High Court referred three questions to the Court of Justice of the European Union ("**CJEU)** in the Winter 2024 and Summer 2025 Proceedings (the "**Preliminary Reference**"),[11] with respect to:

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6 Final W24 Decision dated 7 May 2024.

7 *daa plc v Irish Aviation Authority* (High Court Record Number: 2024/920 JR)

8 *Ryanair Designated Activity Company v. Irish Aviation Authority* (High Court Record Number: 2024/928 JR); *Aer Lingus Limited v Irish Aviation Authority* (High Court Record Number: 2024/926 JR)

9 S25 Final Decision dated 10 October 2024.

10 Aer Lingus v the IAA (High Court Record Number 2024 1296 JR), Ryanair v the IAA (High Court Record Number 2024 1299 JR) and A4A v the IAA (High Court Record Number 2024 1297 JR)

11 Preliminary Reference Ruling of Mr Justice O'Donnell dated 11 December 2024

1. whether planning conditions and in particular the 32mppa Conditions are constraints on the capacity of Dublin Airport that require to be reflected in the Coordination Parameters for Dublin Airport.

2. whether Coordination Parameters can be set by the IAA that would result in slots with respect to which the Airlines had historic precedence under Article 8(2) of the Slot Regulation not being allocated to the Airlines; and

3. whether the Slot Regulation prohibits daa from unilaterally closing Dublin Airport for the purpose of preventing the operation of allocated slots to avoid a breach of the 32mppa Conditions.

An oral hearing before the CJEU took place on 25 November 2025. The Advocate General's Opinion was delivered on 12 February 2026[12]. The Advocate General in his Opinion agreed with daa's argument that the IAA is required to take account of the existing passenger capacity conditions when declaring capacity at Dublin Airport.

On the question of whether the Slot Regulation prohibits daa from unilaterally closing Dublin Airport for the purpose of preventing the operation of allocated slots to avoid a breach of the existing passenger capacity conditions), the Advocate General also agreed with daa and expressed the opinion that:

> *"100. The system introduced by Regulation No 95/93 is based on medium-term forecasting and contains mechanisms which avoid decisions as drastic as the closure of an airport in order to comply with a requirement known well in advance, such as the 32 mppa condition.*
>
> …
>
> *102. An airport closure may be ordered for other reasons (relating to safety, weather conditions and similar factors), but Regulation No 95/93 contains no provision envisaging a closure in order to comply with the maximum permitted number of passengers".*

The CJEU's judgment is awaited.

2.5 Chapter Summary

This chapter has explained the origin of the existing passenger capacity conditions, the planning and operational context in which they were imposed, and the materially different circumstances in which they now fall to be considered. It has demonstrated that current passenger demand exceeds the 32 mppa threshold, that passenger throughput is determined by factors outside daa's control and that daa has taken extensive legal steps to seek compliance with the conditions or change through planning, regulatory, operational and legal mechanisms. Because passenger throughput is dependent on factors outside daa's control, compliance cannot presently be secured unless the existing passenger capacity conditions are reflected by the IAA in airport capacity declarations and implemented through the slot allocation process described in Appendix II.

The chapter has also explained the central role of the airport-capacity declaration and slot-allocation process in determining airport activity.

12 Opinion of Advocate General Campos Sánchez-Bordona delivered 12 February 2026

Chapter 3: Reasons for making the application

3.1 Introduction

This chapter sets out the reasons and justification for the Proposed Order for the purposes of section 7(2) of the Act and by reference to section 25(2) informing the Minister's decision.

It explains the timing imperative for amending the existing passenger capacity conditions, the economic and social consequences of inaction, and the consistency of an amendment with relevant Government, national, regional and local policy.

Dublin Airport is the State's primary international airport and a critical element of national infrastructure. It supports international connectivity, trade, tourism, foreign direct investment, labour mobility, regional access, business travel, cargo movement and social connectivity. Its role is recognised across national, regional, local and sectoral policy and underpins the reasons and justification for the Proposed Order.

3.2 Urgency and Timing Imperative

The need for Ministerial action is urgent. As identified in section 2.4, passenger demand now exceeds the 32 mppa threshold. The Proposed Order is therefore not premised on future demand alone; it responds to existing passenger throughput above 32 mppa, the faster than expected recovery following Covid, forecast demand in the short term, and the practical timing requirements of airline scheduling and slot coordination.

The capacity available for allocation, to facilitate airline scheduling and slot-coordination decisions, is declared by the IAA up to six months in advance of the start of an operating season, as defined by IATA. It is at that time that all constraints are identified and defined for the purposes of slot coordination by the IAA. If the existing passenger capacity conditions remain an active environmental, technical or operational constraint, and must be taken into account in declaring capacity, as identified within the EU Slot Regulation (as above, this question is before the European Court of Justice and a judgment is expected this year), the IAA may be required to reduce available capacity in upcoming capacity declarations for Summer 2027, which will be determined by October 2026, and Winter 2027, which will be determined by May 2027, or until such time as consent to increase the existing passenger capacity to 40 million passengers per annum is granted through the IA.

The urgency is heightened by ongoing enforcement, court and regulatory processes concerning the existing passenger capacity conditions and their interaction with the slot-coordination regime. Although the existing passenger capacity conditions are the subject of the High Court Stay (see section 2.4 above) meaning that the IAA cannot currently take them into account in its capacity declarations pending determination of that litigation, the Opinion of the Advocate General is that the existing passenger capacity conditions are *"an element which, with binding effect on all concerned, affects, precisely, the operational capacity of the airport"* and *"may be classified as 'relevant constraints' and form part of the objective analysis of the possibilities of accommodating the air traffic at a particular airport".* The CJEU ruling, which is awaited, is expected to align with the Advocate General's Opinion.

In that scenario, airlines will be unable to obtain or retain the slots required to operate services at Dublin Airport and at corresponding airports at the other end of relevant routes. Other implications include constrained airline schedules, reduced route and frequency planning, reduced passenger choice, and weaker airline confidence in growth at Dublin Airport. The damage to the economy and consequences for the travelling public cannot be overstated if the capacity of Dublin Airport is forced to reduce by approximately 4 million passengers over a very short period (potentially six months or less). In practical terms, this means fewer flights, fewer available seats, reduced choice for passengers, higher fares, and increased difficulty for people travelling for business, tourism, education, healthcare and family reasons. Airlines may be unable to maintain or grow services to and from Dublin, resulting in reduced connectivity

and lost opportunities for the wider economy. The impact on Ireland's economy, international competitiveness and the travelling public would be immediate and significant and cannot be overstated.

The IA does not resolve that timing risk. It is a separate planning application that also includes physical airport infrastructure and, although already in process, is likely to require considerable time to progress through FCC, ANCA and, if appealed, ACP processes. The existing passenger capacity issue arises on a shorter operational timetable because airline planning and slot coordination occur well in advance of operating seasons and because of demand from the public. The Proposed Order is therefore required to address the existing passenger capacity conditions through the specific statutory mechanism established by the Act.

Accordingly, the timing imperative supports progressing the statutory process without avoidable procedural delay, for the reasons addressed further in Chapter 6.

3.3 Consequences of Inaction

If, as outlined above, the IAA is required to take the existing passenger capacity conditions into account in future capacity declarations (assuming the Court of Justice takes the same view as the Advocate General, which is very likely), Dublin Airport's ability to meet passenger demand and support national connectivity would be severely constrained and reduced from current levels to 32 mppa.

Section 25(2) of the Act identifies three relevant categories of harm as bases for the making of an Order by the Minister: harm to the economy of the State, harm to international connectivity, and harm to the international reputation of the State in respect of air transport. The consequences addressed in this section should be understood in two related but distinct ways. First, there is the certain impact of reducing aviation activity from current passenger throughput levels back to 32 mppa for an unknown period pending, at least, the outcome of the IA (and noting, of course, that one cannot assume a favourable outcome to the IA). Secondly, there is the opportunity cost of activity that would otherwise have been facilitated by Dublin Airport, including foregone connectivity, tourism, trade, investment, national competitiveness, economic growth, labour mobility and wider State interests.

Economy of the State

- **Consequences for the travelling public if passenger numbers are required to be reduced / not permitted to grow.** If the existing passenger capacity conditions are not amended, and the IAA is ultimately required to factor those conditions into future seasonal capacity decisions, this will result in a reduction of over 4 million passengers over a very short period of time (potentially six months) in the very near future.

  Based on current demand, Dublin Airport is forecast to reach 40 mppa by 2029. Similarly, if the existing passenger capacity conditions are not amended, this means that approximately 8 million people will be unable to travel from 2029 with a smaller but increasing number in the intervening years. This will have enormous social and other consequences, inevitably leading to higher prices for the travelling public where demand grossly outweighs supply.

  The implications of retaining the existing passenger capacity conditions at their current level extend well beyond the airport itself. The restrictions have already attracted international attention, including a complaint by A4A to the United States Department of Transportation regarding access and competitive conditions in the Irish aviation market. If the cap is not amended, airlines may be unable to maintain or expand services at Dublin Airport, resulting in fewer flights, fewer available seats, reduced passenger choice and increased pressure on airfares. This would make it more difficult for people to travel for business, tourism, education, healthcare and family reasons, while also reducing Ireland's international connectivity and competitiveness. Maintaining the restrictions risks undermining confidence in Ireland's ability to provide the airport capacity required to support trade, tourism and investment, with significant consequences for economic growth, Ireland's international reputation and the travelling public.

- **Foregone future economic growth:** Retention of the existing passenger capacity conditions at 32 mppa would constrain Dublin Airport's ability to accommodate forecast future demand. The consequence would not simply be a restriction on passenger numbers, but a corresponding loss of the economic activity that those passengers would support, including tourism revenues, business investment, employment growth, labour mobility and wider economic output. Published economic analysis[OBJ] estimates that maintaining the cap could result in approximately 17,800 foregone jobs and €1.5 billion in foregone Gross Value Added (GVA) by 2030. The opportunity cost would therefore increase over time as demand continues to grow while capacity remains constrained.

- **Trade, investment and labour mobility:** International air connectivity is a critical enabler of trade, investment and economic competitiveness. It facilitates access to international markets, customers, suppliers, investors and skilled labour, and supports the efficient movement of people and goods. Outdated capacity constraints at the State's principal international gateway may therefore diminish Ireland's attractiveness as a location for investment, reduce business connectivity and weaken the State's ability to compete effectively in an increasingly global economy. The significance of international connectivity is reflected in the scale of Ireland's internationally traded and investment-dependent economy, with IDA Ireland client companies employing over 302,000 people in 2024 and securing 234 investments associated with approximately 13,500 future jobs.

- **Tourism and visitor expenditure:** Dublin Airport is the State's principal entry point for international visitors. The existing 32mppa passenger capacity conditions limit the State's ability to accommodate inbound tourism demand, particularly during peak travel periods, reducing visitor expenditure and the economic benefits associated with international tourism. The effects may extend across accommodation providers, hospitality businesses, visitor attractions, retail, transport operators and other sectors dependent on visitor activity. In 2024, Dublin welcomed approximately 4.1 million overseas tourists who generated €2.4 billion in tourism revenue, while national out-of-state visitor expenditure was estimated at approximately €6.6 billion, demonstrating the significant economic value supported by international air access.

- **Impact on existing economic activity:** Reducing activity from current passenger throughput levels of approximately 36.4 million passengers per annum to 32 million passengers per annum would represent a very material contraction in airport activity relative to existing demand. Such a reduction would have implications not only for the aviation sector but also for the broader economy, given the extent to which passenger activity supports tourism, trade, investment, employment and economic growth. Dublin Airport is estimated to support approximately 116,100 jobs and €9.6 billion in GVA, equivalent to approximately 2.3% of national economic output, illustrating the scale of economic activity associated with its operation.

- **Passengers, consumer welfare and affordability:** Capacity constraints below demand may reduce competition and increase travel costs for passengers and businesses choice. International evidence suggests that capacity-constrained airports can contribute to higher air fares and reduced competition, with congestion-related fare premiums across European airports estimated at approximately €2.1 billion annually, potentially rising to €6.3 billion by 2035.

International Connectivity

- **Airline confidence, investment and growth:** Airlines, investors and other aviation stakeholders place significant weight on certainty when making long-term planning, investment, aircraft-deployment and route-development decisions. Continued uncertainty regarding Dublin Airport's ability to accommodate demand may discourage airlines from introducing new services, increasing frequencies, basing additional aircraft or expanding existing routes. It may also influence decisions regarding aircraft allocation, infrastructure investment and longer-term

market participation. This may reduce Dublin Airport's ability to attract new airline operators, secure further growth from existing carriers and compete effectively for aviation investment in an increasingly competitive international market.

- **Risk of connectivity displacement:** Where airlines are unable to secure growth opportunities at Dublin Airport, aircraft, routes and frequencies may be allocated to competing airports instead. Once established elsewhere, those services may not readily return, creating a risk that lost connectivity becomes structural rather than temporary. The existing passenger capacity conditions may therefore result not only in forgone future growth but also in a permanent redistribution of aviation activity to competing jurisdictions. This risk extends beyond commercial considerations, as the passenger cap has already attracted international scrutiny, including the complaint brought by A4A to the United States Department of Transportation. Continued constraints on access to Dublin Airport may undermine confidence in Ireland's ability to accommodate international air services and support open aviation markets, with potential implications for transatlantic connectivity, future route development and Ireland's wider economic competitiveness.

- **Connectivity to international markets:** The existing passenger capacity conditions may reduce route choice, service frequencies and direct access to key European, transatlantic and other international destinations. Reduced connectivity may in turn affect Ireland's accessibility to international markets, investment centres, business networks and trading partners, reducing the ease with which Ireland can engage with the global economy.

- **Hub development and network effects:** The existing passenger capacity conditions may limit Dublin Airport's ability to strengthen its role as an international hub and support transfer traffic. This may have implications beyond individual routes, as the value and resilience of an aviation network generally increase with scale and connectivity. Constraints on hub development may therefore reduce the viability of new and existing services and weaken Ireland's overall connectivity offering, particularly in relation to transatlantic markets.

- **Business, labour and social connectivity:** International air services support business travel, labour mobility, educational links, cultural exchange and family and diaspora connections. The existing passenger capacity conditions may therefore have wider economic and societal implications by limiting the ease with which individuals, businesses and communities can connect internationally.

International Reputation of the State in Respect of Air Transport

- **Regulatory certainty and strategic infrastructure delivery:** Continued uncertainty regarding the operation and future capacity of Dublin Airport may create an external perception that strategically important national infrastructure cannot respond effectively to demonstrated demand. Prolonged enforcement, litigation and regulatory processes may undermine confidence in the predictability and effectiveness of the State's planning and regulatory framework, particularly in relation to critical infrastructure of national importance.

- **Competitiveness relative to peer airports:** Airports throughout Europe and the UK actively compete for airline capacity, route development opportunities, transfer traffic and long-haul services. The existing passenger capacity conditions at Dublin Airport may weaken its competitive position relative to peer airports and increase the likelihood that future aviation growth is directed elsewhere. This may have consequences for both connectivity and the broader economic benefits associated with air transport.

- **Reputation as a connected and investment-ready economy:** Reliable international connectivity and the ability of infrastructure to respond to economic demand are important considerations for internationally mobile investment. Continued uncertainty regarding the capacity of the State's principal airport may adversely affect perceptions of Ireland as a well-

connected, competitive and investment-friendly economy capable of supporting long-term economic growth.

- **Aviation policy and international engagement:** As the State's principal international gateway, Dublin Airport plays a significant role in supporting Ireland's broader aviation, trade and connectivity objectives. Continued uncertainty regarding its ability to accommodate demand may therefore affect perceptions of Ireland's capacity to support those strategic objectives and to maintain and enhance its position within international aviation networks.

3.4 Policy Consistency and Support for Sustainable Growth

The policy matters identified below are included to demonstrate how the request for amendment is supported by the wider planning, aviation, economic and infrastructure policy framework. That policy framework recognises the role of Dublin Airport as strategic national infrastructure and supports its sustainable growth in order to maintain international connectivity, economic competitiveness, tourism, trade, investment and wider State interests. The timing of the Proposed Order is also relevant: where passenger demand already exceeds 32 mppa, any delay in amending the existing passenger capacity conditions risks undermining the policy objectives that depend on Dublin Airport's ability to plan and operate with sufficient certainty.

- **National Planning Framework First Revision (2025):** Amendment of the existing passenger capacity conditions will underpin support the implementation of NPF National Strategic Outcome (NSO 4) of securing high-quality international connectivity, which is crucial for Ireland's overall competitiveness, it is also fully aligned with the NPF's recognition that enhanced airport capacity' is a 'key priority' that is essential to the sustainable growth of Dublin into the future.
- **Regional Spatial and Economic Strategy for the Eastern and Midland Region (2019):** Amendment is consistent with the RSES RPO 8.17 which provides for *"Support the National Aviation Policy for Ireland and the growth of movements and passengers at Dublin Airport to include its status as a secondary hub airport".* It is also consistent with regional objectives supporting and facilitating the continued growth of Dublin Airport.
- **National Aviation Policy for Ireland (NAP) (2015):** Amendment supports the policy objective of enhancing Ireland's connectivity by ensuring safe, secure and competitive access responsive to the needs of business, tourism and consumers, and by enabling Dublin Airport to perform its role as the State's primary international gateway and hub airport. The NAP also considers the growth in air traffic numbers as being critical for the development of Irish society and the Irish economy. It also considers that it is essential that Dublin Airport commits to fully exploiting the potential of the US customs and border pre-clearance facility.
- **Programme for Government (2025):** Amendment is aligned with the Government's stated commitment to address the Dublin Airport existing passenger capacity constraint, while preserving the requirement for the statutory process and applicable environmental assessments to be completed.
- **Fingal Development Plan (2023-2029):** Amendment is aligned with the recognition of Dublin Airport as nationally significant infrastructure, a primary economic hub for Fingal and a key driver of trade, tourism, inward investment, employment and international connectivity. It is also fully aligned with policy objective DA01 which seeks to facilitate the operation and future development of Dublin Airport in line with Government policy. Section 8.1 of the Plan expressly acknowledges that passenger numbers at Dublin Airport are forecasted to reach 40 million persons per annum by 2030.
- **Dublin Airport Local Area Plan (LAP) (2020, as extended):** Amendment is consistent with Objectives ED01 and ED03 of the LAP which seek to protect the core operational function of Dublin Airport as the county's main international airport whilst at the same time supporting the economic potential of the Airport to provide significant levels of employment in Fingal. Section

1.0 of the LAP also expressly acknowledges that passenger numbers at Dublin Airport are forecasted to reach 40 million persons per annum by 2030.

- **Fingal Economic Strategy 2015-2021 and successor local economic policy:** Amendment supports the role of Dublin Airport in local and regional economic development, including employment, enterprise, supply-chain activity, tourism, aviation services, logistics, cargo, maintenance, repair and overhaul, and other airport-related sectors.
- **Climate, noise and environmental policy and controls:** Amendment does not displace existing climate, aircraft-noise or other environmental controls. Those matters remain subject to their own statutory regimes, including environmental assessment, aircraft-noise regulation and mitigation, monitoring and decision-making by the relevant competent authorities.

Taken together, national, regional, local and sectoral policy recognise Dublin Airport's strategic role and support sustainable airport development, connectivity and competitiveness, and clearly supports the further growth of Dublin Airport as being in the national interest. Amendment of the existing passenger capacity conditions to 40 mppa is entirely consistent with this policy framework because it enables the Airport to meet existing and future demand up to 40mppa.

Chapter 4: Technical Capacity and 40 mppa Operational Scenario

4.1 Introduction

This chapter identifies and describes the basis on which the Proposed Order has been assessed. It explains the defined 40 mppa operational scenario, the technical-capacity information relied upon in support of that scenario, and the way in which airport activity would continue to be managed through separate statutory and regulatory controls. It sets out the operational and technical basis for assessing the likely effects of amending the existing passenger capacity conditions in the environmental assessments.

4.2 Technical Capacity

Technical-capacity information is provided to explain the physical and operational capability of the Airport. The Infrastructure Capacity Assessment at Appendix IV supports the conclusion that the assessed level of airport activity can be accommodated within existing airport infrastructure and operational systems. The Transport Chapter of the EIAR also demonstrates that, taking into account committed transport infrastructure and identified operational mitigation measures, the existing public transport provision, and the surrounding road network can also accommodate the future operational scenario of 40 mppa. That information provides the factual basis for the EIAR, NIS and WFD assessment to consider the likely effects of the 40 mppa operational scenario. Furthermore, the provisions of section 8.1 of the Fingal County Development Plan 2023-2029 and section 1.0 of the Dublin Airport Local Area Plan 2020, as extended, both state that passenger numbers at Dublin Airport are forecasted to reach 40 million persons per annum by 2030.

The 40 mppa operational scenario is derived from current passenger growth trends, existing passenger throughput (approximately 36.4 mppa in 2025), likely evolution of permitted runway operations (i.e. in accordance with the NRRA with no movement limit), published planning policy forecasts contained within the Fingal County Development Plan and Dublin Airport Local Area Plan, and the demonstrated capability of the existing airport infrastructure to accommodate activity at that level.

Infrastructural Capacity

The Capacity Report at Appendix IV provides the technical basis for the assessment of existing airport infrastructure. It considers the capacity of terminal, airfield, stand, baggage, security, surface access, utilities and operational systems, and identifies the assumptions, dependencies and limitations relevant to those conclusions. The estimated capacity of the existing facilities and infrastructure based off current operational process and current demand profile of Dublin Airport in 2026 is 40.5mppa, demonstrating that the airport has sufficient capacity to accommodate the 40mppa operational scenario.

Surface Access Considerations

Whilst the operational capacity of Dublin Airport is determined by the capability of the airport's infrastructure and operational systems, surface access has historically been identified by Fingal County Council as a planning consideration relevant to passenger growth. The relationship between airport operations and the surrounding transport network is therefore being assessed in detail as part of the EIAR. The Transport chapter demonstrates that the effects of the Proposed Order on the surrounding highway network have been assessed using the agreed assessment methodology, taking account of forecast future conditions and committed transport infrastructure, and describes the adopted mitigation and monitoring framework. Accordingly, surface access constraints are being fully considered as part of the environmental assessment supporting this Application and do not alter the assessment of the airport's technical operating capacity described in this section.

Interface with environmental assessment

The technical-capacity information informs the EIAR, NIS and WFD assessment by providing the factual and operational basis for the assessed level and distribution of passenger activity, aircraft activity, surface access demand and airport operations described in section 4.2.

Technical-capacity information is not relied upon as a substitute for environmental assessment. Nor does it displace any separate consent, permission, licence, regulatory decision, operating restriction, mitigation requirement or statutory function governed by another enactment or competent authority.

4.3 Defined Assessment Scenarios

For the purposes of the environmental assessments, four schedules have been developed to provide a consistent and transparent basis for assessing the likely significant environmental effects of the Proposed Order. The schedules distinguish between the existing permitted capacity baseline; the current state of the environment / current operational baseline; the future Do Something state with the Proposed Order; and a future Do Nothing state in which the existing passenger capacity conditions remain in force.

For the purposes of the scenarios, passenger numbers are defined and counted as a person carried on an aircraft and covered by a ticket in line with the definition of passenger by the International Air transport Association (Ref. IATA, Standard Schedules Information Manual, RP1761b) and includes that a transfer passenger is counted as two passengers. This is termed an 'aviation' count basis in the documentation and forms the basis of all assessments presented. This approach is without prejudice to daa's position that the existing passenger count conditions refer to the Terminal Count (see footnote 4).

This structure allows the effects of amending the existing passenger capacity conditions to be assessed against the existing permitted, current and future baseline conditions, and ensures consistency across the EIAR, NIS and WFD Assessment.

Schedule 1: Existing Permitted Capacity (Baseline) (2023):

The 2023 baseline schedule represents the existing permitted baseline and planning position, reflecting the existing 32 mppa passenger capacity conditions as a planning constraint. It is derived from operational data for the busy day in Dublin Airport in 2023, including schedules, fleet mix, route structures and overall activity. While recorded passenger throughput for the calendar year reached approximately 33.5 million passengers, the underlying busy day schedule reflects a level of activity broadly consistent with an airport operating at circa 32 million passengers per annum.

Schedule 2: Current State of the Environment (2025):

This schedule reflects the most recent actual operating conditions at Dublin Airport in 2025, when the airport operated at 36.4mppa. It is based on the actual flight schedule from 2025 and is an accurate reflection of how the airport actually operated in the most recent full calendar year of operations. It provides details of each flight during including arrival / departure time, aircraft type, and number of passengers. This schedule provides a complementary reference point to the existing permitted capacity baseline, allowing the assessment to distinguish between current operational performance and the existing permitted capacity baseline.

Schedule 3: Future State of the Environment with Proposed Order (2029):

This schedule represents a future operational scenario, in which passenger numbers increase to 40mppa by 2029 with the Proposed Order in place. It is derived from the 2023 baseline schedule, with adjustments made to reflect forecast growth in passenger demand, associated aircraft movements and changes in fleet mix. Fleet mix assumptions (aircraft used) reflect fleet modernisation that is reasonably expected to occur based on industry norms, trends and

insights. This approach ensures that the future schedule is anchored in observed operational conditions, while enabling a consistent and transparent comparison with the baseline schedules.

Schedule 4: Future State of the Environment without Proposed Order (2029):

This schedule represents a future operational scenario in 2029 without the Proposed Order, in which passenger numbers remain constrained at 32mppa. It is derived from the 2023 baseline schedule, with adjustments made to reflect the forecast year operational assumptions relevant to 2029, including forecast changes in aircraft movements and fleet mix. Fleet mix assumptions reflect fleet modernisation that is expected to occur based on industry norms, trends and insights. This approach ensures that the future Do Nothing schedule is anchored in observed operational conditions, while enabling a consistent and transparent comparison with the future operational scenario with the Proposed Order.

Table 4.1 Assessment Schedules

Scenario*	Operational Assumptions**	Passengers (mppa)***	ATMs Daytime (0700-1859)	ATMs Evening-time (1900-2259)	ATMs Night-Time (2300-0659)
1. Existing Permitted Capacity (Baseline)/ Planning Position (2023)	• North RWY Operating Hours – 07:00-22:59 • No Noise Quota Count • No Annual Movement Quota	32.0	156,735	50,168	32,890
2. Current State of the Environment/ Current Operational Baseline (2025)	• North RWY Operating Hours – 07:00-22:59 • No Noise Quota Count • No Annual Movement Quota	36.4	181,924	41,399	31,859
3. Future State with the Proposed Order/ Do Something (2029)	• Noise Quota Count – 16,260 QC Points • North RWY Operating Hours – 06:00-23:59 • No Annual Movement Limit	40.0	186,739	54,808	37,444
4. Future State without the Proposed Order/ Do Nothing (2029)	• Noise Quota Count – 16,260 QC Points • North RWY Operating Hours – 06:00-23:59 • No Annual Movement Limit	32.0	156,735	50,168	32,890

* The schedules presented in Table 4.1 represent the forecast day, evening and night ATM breakdown used for the current assessment. These schedules are based on updated forecasts prepared for the current assessment and are separate from those used for the NRRA. The NRRA was based on an earlier 2020/2021 forecasting dataset which did not reflect the faster-than-anticipated recovery in air traffic following COVID-19. The Inspector's annual night-time ATM limit of 35,672 was derived from the 98 night-time movements referenced in the 2021 NRRA EIAR. That figure relates to the earlier NRRA forecasting dataset and is not the basis for the schedules presented in Table 4.1.

The future schedules presented in Table 4.1 do not apply an annual night-time movement limit. As set out in the Application Report, the future scenarios assume operation in accordance with the Noise Quota Scheme but without an annual movement cap.

** **Operational Assumptions**: It is assumed that, in 2029, the operating parameters for the runway system will reflect the ACP decision on the North Runway Relevant Action, including North Runway operating hours of 06:00–23:59 and an NQS of 16,260 QC points but without the movement limit (which was included in that decision) having regard to the decision of the European Commission dated 10 February 2026 (see copy at Appendix VI).

*** **Forecasted Growth:** Based on current passenger growth trajectories, airport activity is likely to reach 40 mppa by 2029.

These assumptions are considered to represent the most realistic and supportable basis currently available for the assessment. Furthermore, the assessed assumptions represent a reasonable worst-case scenario from an overall environmental perspective. The scenario permits aircraft movements during shoulder periods, which occur within the night-time period. In addition, application of the NQS without a movement limit provides greater flexibility to accommodate aircraft movements and therefore results in a higher potential movement profile than a scenario where a movement limit also applies.

The operational schedules described above provide the basis for the assessment framework adopted within this EIAR. The framework distinguishes between the Principal Assessment, which identifies the environmental effects of the Proposed Order, and Supporting Assessments, which provide planning and operational context where relevant to individual environmental topics.

Table 4.2 Assessment Framework

Assessment	Comparison	Purpose
Principal Assessment	Schedule 4 → Schedule 3 (2029 Do Nothing vs 2029 Proposed)	Identifies the environmental effects directly attributable to the Proposed Order. This forms the primary assessment of likely significant effects and is reported within every environmental topic.
Supporting Assessment 1	Schedule 1 → Schedule 3 (2023 Permitted vs 2029 Proposed)	Provides planning context by comparing the existing permitted operation with the future operation following the Proposed Order.
Supporting Assessment 2	Schedule 2 → Schedule 3 (2025 Current vs 2029 Proposed)	Provides operational context by comparing current airport operations with the future operation following the Proposed Order.
Supporting Assessment 3	Schedule 2 → Schedule 1 (2025 Current vs 2023 Permitted)	Provides context by illustrating the relationship between current airport operations and the existing permitted operation.

Chapter 5: Environmental Information and Assessment

5.1 Introduction

An Environmental Impact Assessment Report (EIAR) is being prepared in support of the Proposed Order to identify, describe and assess the likely significant environmental effects of the Proposed Order. This chapter summarises the environmental information available from the EIAR process to date and explains how the likely environmental effects of the Proposed Order have been identified and assessed. It provides environmental information in accordance with section 12(2) of the Dublin Airport (Passenger Capacity) Act.

The environmental assessments supporting the application have been undertaken by appropriately qualified specialists using recognised assessment methodologies. As described in Chapter 4, the assessments are informed by a common set of operational assumptions to provide a consistent basis for assessing the environmental effects of the Proposed Order across all environmental topics.

The environmental assessment work undertaken to date has progressed substantially beyond that typically associated with the scoping stage of the Environmental Impact Assessment process. The assessments have moved beyond the identification of matters requiring assessment and include detailed baseline studies, technical modelling, impact assessment and the identification of likely significant environmental effects across the relevant environmental topics. Accordingly, the environmental information currently available provides a robust basis for understanding the likely significant environmental effects of the Proposed Order and the scope of the matters requiring further assessment through the completion of the EIAR.

The Proposed Order relates solely to the amendment of the existing passenger capacity conditions at Dublin Airport and does not involve physical development or construction works. Consequently, certain environmental pathways typically associated with construction activities or permanent land use change are not expected to give rise to likely significant environmental effects. Nevertheless, a precautionary approach has been adopted in defining the scope of the environmental assessments to ensure that all potentially relevant environmental effects have been appropriately considered.

The environmental assessments have been prepared using a consistent assessment framework that is applied across the EIAR, whilst recognising the differing statutory, technical and methodological requirements of individual environmental topics. The assessment framework is described in Section 5.3 and provides the basis for identifying and assessing the environmental effects of the Proposed Order.

The remainder of this chapter summarises the environmental reports prepared in support of the application and explains how the scope of the environmental assessments has been defined having regard to the characteristics of the Proposed Order, the receiving environment and the relevant legislative requirements. Detailed assessment methodologies, baseline information, modelling approaches and assessment findings are presented within the relevant environmental assessment reports.

5.2 Proposed Scope of the EIAR

The scope of the EIAR has been developed having regard to the requirements of section 13(2) of the Act. The scope has also been informed by the European Commission's Environmental Impact Assessment of Projects – Guidance on Scoping (2017), the Environmental Protection Agency's Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (2022), together with project-specific technical review and consultation undertaken during the preparation of the EIAR.

The scoping process considered the environmental factors requiring assessment, the operational characteristics of the Proposed Order, the environmental pathways through which effects could arise, and the availability of relevant environmental information to identify those matters requiring detailed assessment.

5.3 Assessment Framework

The environmental assessment framework comprises a Principal Assessment, supported where appropriate by Supporting Assessments.

Principal Assessment

The Principal Assessment provides the basis for identifying and assessing the environmental effects of the Proposed Order and for determining the likely significant environmental effects within each environmental topic.

For each environmental topic, the Principal Assessment compares the 2029 Permitted Operation (Do Nothing) scenario, in which the existing passenger capacity conditions remain in place, with the 2029 Proposed Operation (Do Something) scenario, in which the existing passenger capacity conditions are amended to 40 mppa. This comparison isolates the environmental effects attributable to the Proposed Order by assessing the environmental consequences of amending the existing passenger capacity conditions whilst holding other operational assumptions constant.

The Principal Assessment is applied consistently across all environmental topics. Individual environmental assessments then apply the assessment methodologies, significance criteria and legislative requirements relevant to that discipline.

Supporting Assessments

In addition to the Principal Assessment, some environmental topics include one or more Supporting Assessments. These assessments are supplementary to the Principal Assessment and are included only where they assist in interpreting the assessment findings or are required to address topic-specific legislative or technical requirements.

Supporting Assessments do not replace the Principal Assessment and are not used as the basis for determining the likely significant environmental effects of the Proposed Order. Rather, they provide additional context to support interpretation of the Principal Assessment where this assists in understanding existing environmental conditions, longer-term trends or other relevant operational circumstances.

The Supporting Assessments differ between environmental topics to reflect the characteristics of the receiving environment, the nature of the potential environmental effects and the relevant legislative or technical requirements. Table 5.1 summarises how the assessment framework has been applied across each environmental topic.

Table 5.1 - Assessment Framework by Environmental Topic

Environmental Topic	Supporting Assessments	Reason	Assessment Approach
Traffic and Transport	Supporting Assessments 1, 2 and 3	Supporting Assessments provide planning and operational context for changes in travel demand, mode share, traffic flows and network performance.	Quantitative transport modelling supported by qualitative assessment.
Air Quality	Supporting Assessments 1, 2 and 3	Supporting Assessments provide planning and operational context for changes in emissions associated with airport operations and surface access traffic.	Quantitative air quality modelling supported by qualitative assessment.
Non-Aircraft Noise	Supporting Assessments 1, 2 and 3	Supporting Assessments provide planning and operational context for changes in landside operational noise associated with differing levels of airport activity.	Quantitative noise modelling supported by qualitative assessment.

Environmental Topic	Supporting Assessments	Reason	Assessment Approach
Aircraft Noise and Vibration	None	The chapter presents Current State information to describe the existing noise environment; however, the assessment of likely significant effects is based on the Principal Assessment.	Quantitative aircraft noise modelling.
Land, Soils and Geology	None	The Proposed Order does not involve construction or land disturbance. The Principal Assessment is therefore sufficient to identify any operational environmental effects.	Qualitative assessment informed by baseline information and professional judgement.
Water	None	The Principal Assessment identifies the environmental effects attributable to the Proposed Order. The separate Water Framework Directive Assessment addresses the specific legislative requirements applicable to water bodies.	Qualitative assessment supported by the Water Framework Directive Assessment.
Biodiversity	None	The Principal Assessment identifies ecological effects arising from the Proposed Order. The Natura Impact Statement applies the separate assessment required under the Habitats Directive.	Ecological assessment informed by desk study, surveys and professional judgement.
Natura Impact Statement (including Appropriate Assessment Screening)	None	Prepared in accordance with the Habitats Directive and its own statutory assessment framework rather than the Supporting Assessment framework.	Appropriate Assessment Screening and Natura Impact Statement.
Climate	Supporting Assessments 1, 2 and 3	Supporting Assessments provide planning and operational context for greenhouse gas emissions associated with permitted, current and proposed airport operations. Projections to 2050 are included in the assessment.	Quantitative greenhouse gas assessment.
Cultural Heritage	None	The Proposed Order does not involve physical impacts on heritage assets. The Principal Assessment is sufficient to assess operational effects where relevant.	Desk-based assessment supported by professional judgement.
Landscape and Visual	None	The Proposed Order does not introduce new physical development. The Principal Assessment is sufficient to assess any operational effects on landscape character and visual amenity.	Landscape and visual assessment informed by professional judgement.
Material Assets (Waste)	Supporting Assessments 1, 2 and 3	Supporting Assessments provide planning and operational context for changes in operational waste generation associated with airport activity.	Quantitative and qualitative assessment.
Material Assets (Built Environment)	Supporting Assessments 1, 2 and 3	Supporting Assessments provide planning and operational context for changes in demand on utilities and built infrastructure associated with airport activity.	Qualitative assessment informed by infrastructure capacity information.
Major Accidents and Disasters	None	The assessment considers the resilience of the airport's operations to major accident and disaster risks with the Proposed Order in place. Supporting Assessments would not materially influence this evaluation.	Qualitative risk-based assessment.
Population and Human Health	None	The assessment draws together the findings of the relevant environmental topics to identify effects on people and communities. Supporting Assessments would duplicate the underlying topic assessments.	Qualitative assessment informed by baseline information and the findings of the technical chapters.

5.4 Environmental Impact Assessment Report

The EIAR identifies, describes and assesses the likely significant environmental effects associated with the Proposed Order by reference to the Primary Assessment described in Chapter 4.

Table 5.2 provides an overview of the EIAR chapters that will establish the context for the topic-specific environmental assessments.

Table 5.2: Overview of Supporting EIAR Chapters

EIAR Chapter	Purpose
Chapter 1 – Introduction	Introduces the Proposed Order, the purpose and structure of the EIAR, and the legislative and regulatory context for the environmental assessment.
Chapter 2 – Site and Surroundings	Describes Dublin Airport, the airport estate and the surrounding receiving environment, providing the context for the topic-specific environmental assessments.
Chapter 3 – Alternatives	Describes the reasonable alternatives considered by daa and explains the reasons for selecting the Proposed Order as proposed, taking into account the potential effects on the environment.
Chapter 4 – Proposed Order	Describes the operational characteristics of the airport with the Proposed Order in effect, including the airport operational assumptions, forecast activity levels and the common assessment scenarios adopted throughout the EIAR.
Chapter 5 – Methodology	Describes the overall environmental assessment approach, including the scoping process, assessment methodology, environmental baselines and assessment framework.
Chapter 21 – Future Airport Development	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 within the EIAR.
Chapter 22 – Mitigation and Monitoring Summary	Summarises the mitigation, monitoring and environmental management measures identified through the EIAR and the mechanisms by which they will be implemented, where required.

Table 5.3 is provided below for the purposes of section 12(2) of the Act and summarises the likely impact of the Proposed Order on the environment based on the information available at this stage of the statutory process. The terminology used to describe the significance of environmental effects is consistent with the EPA Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EPA, 2022).

It identifies, by environmental topic, the findings to date on the likely significant environmental effects of the Proposed Order, and the mitigation, monitoring or control measures r identified. Final conclusions remain subject to completion of the environmental assessments and to any further information, consultation or assessment required by the Minister or ACP. Where relevant, cumulative and transboundary environmental effects have also been considered.

Table 5.3: Environmental Impact Assessment: Environmental Assessment Topics and Current Assessment Position

EIAR Topic / Chapter	Environmental Pathways and Receptors potentially impacted	Assessment Methodology	Findings to date on likely impact on the environment	Mitigation, Monitoring and Controls
Traffic and Transport **EIAR Chapter 6; Appendices 6-1 to 6-6**	The Principal Assessment considers potential effects on the external strategic and local surface access network, including the R132, M1 and M50 links and airport access junctions and transport network performance arising from airport operations. Potential effects on the internal airport surface access network including the existing Ground Transportation Centre (GTC) for public transport.	Assessment of the internal airport transport network and external road network using a bespoke transport demand model calibrated to 2025 conditions, together with junction capacity assessment, Dublin Airport Surface Access Monitoring Framework indicators, traffic surveys and public transport demand forecasting. The assessment includes the key links on the adjacent motorway network, principal airport access junctions, key adjacent local road links and the operation of the existing GTC. The assessment takes account of embedded transport measures, committed public transport infrastructure and services, the Landside Transformation Programme and the Mobility Management Plan.	The assessment undertaken to date indicates that the Proposed Order will not give rise to likely significant operational effects on the external strategic or local road networks, or on the internal road network. Effects are localised to the airport surface access network, are direct, long-term and reversible operational effects associated with forecast traffic demand and are not expected to affect the wider strategic transport network. A moderate negative operational effect is forecast in the PM peak hour for traffic exiting the airport via the Airport Roundabout, together with a slight negative effect for traffic entering the roundabout from the M1 link in the AM peak. A moderate negative operational effect is also forecast at the Ground Transportation Centre (GTC). These effects are confined to peak operational periods and will occur only if forecast traffic demand materialises. The assessment concludes that the transport impacts associated with the Proposed Order can be accommodated through the existing and committed transport network and meet the Key Performance Indicators agreed with relevant stakeholders in the airport's established Surface Access Monitoring Framework.	The Surface Access Monitoring Framework provides a mechanism for regular and active monitoring of the established key performance indicators for surface access, namely, passenger car mode share, staff car mode share, and the combined total number of vehicles entering and exiting the airport campus in a single hour. It allows for early intervention through mitigation measures if KPIs are not met. Passenger travel is performing broadly as expected. However, staff car mode share at 36 mppa exceeds the projected mid-point. Mitigation would therefore target staff travel demand and may include: additional remote working by staff, where operationally feasible; staggered staff working hours to reduce travel during peak commuting periods; • staff parking restrictions during peak periods; • dynamic management of staff parking, including variable tariffs and time-based access controls; • promotion of active travel, including enhanced cycle-to-work incentives; • individual staff travel planning to encourage sustainable travel choices; and • incentives to encourage a shift from private car use to public

EIAR Topic / Chapter	Environmental Pathways and Receptors potentially impacted	Assessment Methodology	Findings to date on likely impact on the environment	Mitigation, Monitoring and Controls
				transport and other sustainable modes.
Air Quality **EIAR Chapter 7; Appendices 7-1 to 7-4**	Potential effects on human and ecological receptors arising from changes in emissions associated with airport operations, including aircraft, airside activities, airport energy plant and surface access traffic, together with potential odour effects.	Quantitative dispersion modelling of airside and landside emissions using recognised assessment methodologies and agreed operational assumptions. The assessment considers pollutant concentrations at representative human and ecological receptors, evaluates odour effects, and assesses compliance with relevant national air quality standards, new EU Air Quality Directive limit values and ecological assessment criteria. The air quality study area comprises the spatial extent of the air quality sensitive receptors identified in accordance with relevant guidance, including sensitive human receptors located within the zone of influence of aircraft, road traffic and other operational emission sources associated with the Proposed Order.	The assessment concludes that the Proposed Order would result in no significant effects on air quality or odour. Against current National Air Quality Standards, impacts range from neutral to slight adverse and are not significant. Against the new EU Air Quality Directive (2024/2881) limit values, moderate to substantial adverse impacts are predicted at a limited number of receptors close to the airport for annual mean NO_2; however, taking account of the limited spatial extent, precautionary modelling assumptions and projected improvements in emissions over time, the overall effect is concluded to be not significant. Ecological air quality effects are considered further in the biodiversity assessment.	Existing operational measures, including continued reduction in Auxiliary Power Unit (APU) usage through Fixed Electrical Ground Power, electrification of the Ground Support Equipment fleet and planned reductions in emissions from airport energy centres, will further reduce emissions. Existing air quality monitoring undertaken by daa will also continue. These are taken into account in the EIA. No additional mitigation is required.
Non-Aircraft Noise **EIAR Chapter 8; Appendix 8-1**	Potential effects from operational road traffic noise associated with airport operations on residential and other sensitive receptors within a 4 km × 6 km study area surrounding Dublin Airport, including affected road links identified through the Traffic and Transport assessment.	Assessment of operational road traffic noise using baseline noise surveys at representative monitoring locations, SoundPLAN 9.0 noise modelling and CRTN methodology. The assessment compares the 2029 Proposed Order and 2029 Do Nothing scenarios using forecast traffic flows from the Traffic and Transport assessment.	The assessment undertaken to date indicates that the Proposed Order will not give rise to likely significant operational effects from non-aircraft noise. Direct operational effects associated with airport operations and surface access traffic are predicted to be negligible, with road traffic noise changes of less than 1 dB across the study area. The effects are localised, long-term and reversible, with no significant residual or cumulative effects identified at sensitive receptors.	No mitigation or monitoring measures are required in relation to non-aircraft noise, as the assessment indicates that the Proposed Order would not give rise to significant operational road traffic noise effects. Existing aircraft noise management measures will continue including the North Runway Relevant Action, Noise Abatement Objective, Night Quota Scheme,

EIAR Topic / Chapter	Environmental Pathways and Receptors potentially impacted	Assessment Methodology	Findings to date on likely impact on the environment	Mitigation, Monitoring and Controls
				fleet modernisation and a wider aircraft noise management regime.
Aircraft Noise and Vibration **EIAR Chapter 9; Appendices 9-1 to 9-5**	The Principal Assessment considers the potential effects of the Proposed Order, by reference to the 40 mppa operational scenario, arising from the propagation of aircraft air noise, aircraft ground noise and aircraft-related vibration generated by airport operations to residential and other noise-sensitive receptors within a study area defined by the largest extent of the potential impacts (represented by the lowest-value noise contours), having regard to the surrounding aircraft noise environment and population exposure.	Aircraft noise and vibration modelling of the Current Operations, Future Do Nothing and Proposed Order scenarios using forecast aircraft movements, representative fleet mix and runway operations. The assessment considers airborne and ground noise, vibration, population exposure and representative community locations against the adopted significance framework and Noise Abatement Objective.	The assessment undertaken to date indicates that the Proposed Order is not likely to give rise to significant aircraft noise or vibration effects. The assessment has considered the direct, long-term operational effects of forecast aircraft operations using significance criteria developed from established aircraft noise guidance and practice, including CAP1616i, having regard to the ANCA Noise Abatement Objective. Effects are confined to the airport and surrounding noise study area and have been assessed in terms of the magnitude of changes in aircraft noise exposure at identified sensitive receptors. The predicted effects would occur during routine airport operations, are recurrent and reversible, and no significant residual or cumulative aircraft noise effects have been identified.	Existing aircraft noise management measures include the North Runway Relevant Action, Noise Abatement Objective, Night Quota Scheme, fleet modernisation and a wider aircraft noise management regime.
Land and Soils **EIAR Chapter 10**	Potential effects on land, soils, geology and groundwater arising from airport operations, including accidental spills, leaks and contaminant pathways.	Qualitative source–pathway–receptor assessment of operational effects on land, soils, geology and groundwater, informed by baseline site investigations, published geological datasets and existing environmental monitoring.	The assessment undertaken to date indicates that the Proposed Order is not likely to give rise to significant effects on land, soils or geological resources. Potential direct operational effects associated with accidental spills and contaminant pathways have been assessed as imperceptible and not significant. Such effects would be localised to the airport operational area, would only occur in the event of an accidental release, would be temporary and reversible, and no significant indirect, secondary, cumulative or transboundary effects have been identified.	No additional mitigation, monitoring or control measures are required, as no likely significant operational effects have been identified
Water Environment **EIAR Chapter 11; Appendices 11-1 to 11-3; De-Icer Modelling Report**	Potential effects on surface water, groundwater, hydrology, hydrogeology, water quality, flood risk and water resources arising from airport operations, including increased pollution risk and operational drainage pathways.	Assessment of surface water, groundwater, hydrology, hydrogeology, flood risk and water quality using a source–pathway–receptor methodology, informed by baseline monitoring, hydrogeological	The assessment undertaken to date indicates that the Proposed Order is not likely to give rise to significant residual effects on the water environment. Potential direct and indirect operational effects on surface water and groundwater have been assessed as localised, long-term and of negligible magnitude, with no deterioration in water body	No additional mitigation, monitoring or control measures are required, as no likely significant operational effects have been identified

EIAR Topic / Chapter	Environmental Pathways and Receptors potentially impacted	Assessment Methodology	Findings to date on likely impact on the environment	Mitigation, Monitoring and Controls
		assessment, drainage studies, flood risk assessment, de-icer modelling and Water Framework Directive assessment. Existing drainage infrastructure, pollution control measures, operational water management procedures and ongoing environmental monitoring have been taken into account within the assessment.	status predicted. No significant secondary, cumulative or transboundary effects have been identified.	
Biodiversity **EIAR Chapter 12; Technical Appendices 12-2 to 12-6**	Potential effects on designated sites, including European sites, habitats, protected and notable species, and ecological networks arising from airport operations. Potential operational pathways include changes in air quality, water quality, disturbance and lighting. The study area comprises feature-specific Zones of Influence determined on the basis of the identified impact pathways, ecological and hydrological connectivity, and the sensitivity of individual ecological features, with the extent informed by published guidance and professional judgement.	Ecological assessment informed by desk studies, habitat surveys, protected species surveys and ecological appraisal. The assessment considers operational air quality, water quality, disturbance and lighting pathways, together with the findings of the Air Quality and Water assessments and the accompanying Natura Impact Statement.	The assessment undertaken to date indicates that the Proposed Order is not likely to give rise to significant effects on biodiversity at County or greater geographical scales. Potential direct, indirect and cumulative operational effects have been assessed through the relevant ecological impact pathways and are predicted to be localised, long-term and of negligible magnitude, with no significant residual effects identified. Potential effects on European sites have been assessed separately through the Appropriate Assessment process, with the conclusions presented in the Natura Impact Statement. See Chapter 5.4 of this Application Report.	Existing operational environmental management measures, drainage infrastructure and pollution control measures have been taken into account within the assessment. No additional mitigation, monitoring or control measures are required, as no likely significant operational effects have been identified.
Climate **EIAR Chapter 13; Appendices 13-1 to 13-3 and 13-5**	Potential effects arising from greenhouse gas emissions associated with airport operations and resilience of airport operations to future climate change, having regard to applicable climate policy objectives and net zero commitments. The assessment does not apply a fixed	Greenhouse gas emissions have been quantified using recognised carbon accounting methodologies for airport operations and assessed against applicable emissions trajectories, carbon budgets, national and international climate policy, including Ireland's	The assessment undertaken to date indicates that the greenhouse gas emissions associated with the Proposed Order are compatible with the relevant emissions trajectories and remain consistent with applicable carbon budgets. The assessment also indicates that the Proposed Order is consistent with applicable national and international climate policy. Potential direct and indirect long-term climate effects have been assessed in	No additional mitigation, monitoring or control measures are required, as no likely significant operational effects have been identified.

EIAR Topic / Chapter	Environmental Pathways and Receptors potentially impacted	Assessment Methodology	Findings to date on likely impact on the environment	Mitigation, Monitoring and Controls
	geographical study area. The assessment boundary is defined by the sources of greenhouse gas emissions associated with the Proposed Order, including airport operations, surface access journeys and departing aviation movements.	carbon budgets and net zero objectives. Climate adaptation has been assessed having regard to projected climate change risks affecting airport operations. Significance has been determined using the adopted climate significance framework. The assessment takes account of embedded airport carbon reduction measures, including daa's Carbon Reduction Strategy, energy efficiency initiatives, renewable energy generation and sustainable surface access measures. The assessment also has regard to wider assumptions relating to aircraft fleet modernisation, sustainable aviation fuel uptake and decarbonisation of the electricity grid.	terms of the magnitude of greenhouse gas emissions and climate resilience, applying the established climate significance framework, and no likely significant climate or climate adaptation effects have been identified, either alone or cumulatively.	
Cultural Heritage **EIAR Chapter 14**	Potential effects on archaeological remains, historic buildings, historic landscapes and cultural heritage assets, including their settings, arising from airport operations. The assessment has adopted a 200 m study area around the defined airport sectors for archaeological and non-designated heritage assets. A wider setting assessment extending up to 1 km from the Proposed Order area was undertaken for designated heritage assets where intervisibility indicated potential effects on setting.	Qualitative assessment of operational effects on archaeological, architectural and cultural heritage assets and their settings, informed by desk-based assessment, site surveys, professional judgement and the findings of the Air Quality, Non-Aircraft Noise and Landscape assessments where relevant.	The assessment undertaken to date indicates that the Proposed Order will not give rise to significant effects on cultural heritage. Potential direct and indirect operational effects on heritage assets and their settings have been assessed and are predicted to be of negligible magnitude, localised and long-term in nature, with no significant effects identified. No significant secondary, cumulative or transboundary effects are predicted.	No additional mitigation, monitoring or control measures are required, as no likely significant operational effects have been identified.
Landscape and Visual	Potential effects on landscape character, visual amenity and	Landscape and Visual Impact Assessment (LVIA)	The assessment undertaken to date indicates that the Proposed Order will not give	No additional mitigation, monitoring or control measures

EIAR Topic / Chapter	Environmental Pathways and Receptors potentially impacted	Assessment Methodology	Findings to date on likely impact on the environment	Mitigation, Monitoring and Controls
EIAR Chapter 15	sensitive visual receptors arising from airport operations, including changes in aircraft movements, landside traffic and operational activity.	undertaken in accordance with GLVIA3 and EPA guidance, informed by desk studies, site surveys, assessment of landscape character and visual receptors, and appraisal of 18 representative viewpoints. Existing airport landscape, operational management and environmental management measures have been taken into account within the assessment.	rise to significant landscape or visual effects. Potential direct and indirect operational effects are predicted to be of negligible magnitude, localised to the existing airport setting and long-term in duration. Whilst increased operational activity may give rise to limited visual changes, these are not significant. No significant secondary, cumulative or transboundary effects have been identified.	are required, as no likely significant operational effects have been identified.
Material Assets — Waste **EIAR Chapter 16**	Potential effects arising from the generation, handling, temporary storage, transport and management of operational waste, including demands on national waste management infrastructure capacity and the achievement of circular economy objectives.	The assessment considers operational waste generated by airport activities and compares predicted municipal and hazardous waste arisings against national waste generation and waste management capacity in Ireland. The methodology follows the ISEP Guide to Materials and Waste in Environmental Impact Assessment and uses published EPA waste statistics to determine the magnitude and significance of effects.	The assessment undertaken to date indicates that operational waste generated under the Proposed Order would represent approximately 0.15–0.20% of national municipal waste arisings and approximately 0.002% of national hazardous waste arisings. Potential direct operational effects are assessed as being of negligible magnitude, long-term in duration and localised to airport waste management activities, resulting in neutral or slight effects that are not significant. No significant indirect, secondary, cumulative or transboundary effects have been identified.	No additional mitigation, monitoring or control measures are required, as no likely significant operational effects have been identified.
Material Assets — Built Services **EIAR Chapter 17**	Potential effects arising from the consumption of built services required to support airport operations, including electricity, gas, water and telecommunications infrastructure, and the capacity of national utility networks to accommodate future operational demand.	The assessment compares forecast operational demand for electricity, gas and water under the Proposed Order with current airport consumption and published national consumption data. Significance is determined by assessing whether resource demand exceeds 1% of total annual national consumption, representing a	The assessment undertaken to date indicates that the Proposed Order will not give rise to significant effects on built services. Potential direct operational effects associated with forecast electricity, gas and water demand have been assessed as being of negligible magnitude, long-term in duration and national in extent, with forecast resource consumption remaining well below the recognised 1% significance threshold for national resource consumption. No significant indirect, secondary, cumulative	No additional mitigation, monitoring or control measures are required, as no likely significant operational effects have been identified.

EIAR Topic / Chapter	Environmental Pathways and Receptors potentially impacted	Assessment Methodology	Findings to date on likely impact on the environment	Mitigation, Monitoring and Controls
		material effect on resource availability.	or transboundary effects have been identified.	
Major Accidents and Disasters **EIAR Chapter 18**	Potential effects arising from the vulnerability of the airport to major accidents and natural disasters with the Proposed Order in effect, and the vulnerability of surrounding receptors to airport operations, including natural hazards, aviation incidents, hazardous substances, transport incidents and emergency response events.	Risk assessment undertaken in accordance with the Department of the Environment's Guide to Risk Assessment in Major Emergency Management and the ISEP Major Accidents and Disasters in EIA guidance. The assessment considers the vulnerability of the airport, in circumstances where the Proposed Order is made, to natural disasters, on-site hazards, off-site hazards and the vulnerability of off-site receptors using a likelihood–consequence risk matrix, with residual risk scores of 8 or above considered significant. The assessment takes account of existing airport emergency planning, aviation safety procedures, flood risk management, Seveso controls, health and safety measures and other established operational controls.	The assessment undertaken to date indicates that the Proposed Order will not give rise to significant effects associated with major accidents or disasters. Potential direct and indirect operational effects associated with major accident and disaster scenarios have been assessed as low probability and low risk, with all residual risks remaining below the significance threshold set out in the Department of the Environment, Heritage and Local Government's Guide to Risk Assessment in Major Emergency Management (2010), under which residual risk scores of 8 or above are considered significant. No significant residual, secondary, cumulative or transboundary effects have been identified following consideration of existing emergency planning, aviation safety measures and other operational controls.	No additional mitigation or monitoring measures have been identified because no significant effects are predicted.
Population and Human Health **EIAR Chapter 19**	Potential effects on population and human health arising from airport operations, including employment, economic activity, tourism, community amenity and health pathways associated with environmental effects identified in other technical assessments.	Assessment of socio-economic effects and human health informed by baseline demographic, employment and economic data, together with consideration of relevant environmental pathways including air quality, aircraft noise, non-aircraft noise, traffic, climate and water. Health effects are assessed by reference to the findings of the relevant technical chapters rather than	The assessment undertaken to date indicates that the Proposed Order will give rise to long-term beneficial effects in relation to employment, economic activity and tourism. Potential direct and indirect operational effects on residential amenity and human health have been assessed through the relevant environmental pathways and are predicted to be localised and of negligible magnitude, with no likely significant adverse effects identified. No significant secondary, cumulative or transboundary effects have been identified.	No additional mitigation, monitoring or control measures are required, as no likely significant operational effects have been identified.

EIAR Topic / Chapter	Environmental Pathways and Receptors potentially impacted	Assessment Methodology	Findings to date on likely impact on the environment	Mitigation, Monitoring and Controls
		through a standalone quantitative health assessment. The assessment takes account of embedded operational management measures and the mitigation identified within the relevant technical assessments, including air quality, aircraft noise, non-aircraft noise and traffic where applicable		
In-Combination and Cumulative Effects **EIAR Chapter 20; Appendix 20-1**	Potential in-combination effects on environmental receptors arising from interactions between different environmental pathways assessed within the EIAR, together with cumulative effects arising from the Proposed Order in combination with other existing and permitted developments.	Assessment of interactions between environmental topics and cumulative effects using the findings of the technical assessments. The assessment considers in-combination effects between environmental factors and cumulative effects with other plans, projects and airport-related developments identified in the cumulative effects assessment. The assessment draws upon the embedded mitigation, operational controls and topic-specific mitigation measures identified within the individual environmental assessments.	No likely significant cumulative or in-combination environmental effects have been identified in the assessment undertaken to date. The completed topic-specific assessments indicate that cumulative effects associated with the Proposed Order are predicted to be of negligible magnitude and are not significant when considered together with other existing or permitted developments.	No additional mitigation, monitoring or control measures are required, as no likely significant operational effects have been identified.

5.5 Natura Impact Statement / Appropriate Assessment

The Natura Impact Statement (NIS) provides the information required to inform the Appropriate Assessment of the Proposed Order under the Habitats Directive and the Act. It identifies the relevant European sites, their qualifying interests and conservation objectives, assesses the operational pathways through which effects could arise, considers the Proposed Order alone and in combination with other plans and projects, and concludes whether the Proposed Order would adversely affect the integrity of any European site.

The Appropriate Assessment is informed by the biodiversity assessment and other relevant technical assessments, including air quality, water environment and disturbance. The assessment undertaken to date indicates that the Proposed Order will not adversely affect the integrity of any European site, either alone or in combination with other plans or projects.

Table 5.4 NIS / Appropriate Assessment Summary

Assessment purpose	To provide the information required to undertake an Appropriate Assessment screening of the Proposed Order under the Habitats Directive and the Act, including whether the Proposed Order, alone or in combination with other plans or projects, would adversely affect the integrity of any European site.
Scope	European sites within the Zone of Influence of the Proposed Order, including the Dublin Bay, Malahide Estuary, Baldoyle Bay, Rogerstown Estuary, Ireland's Eye, Howth Head Coast, Lambay Island and North-west Irish Sea SPA and SAC network, together with their qualifying interests, conservation objectives, impact pathways, mitigation measures and in-combination effects.
Key pathways considered	Operational pathways including air quality, surface water and groundwater, hydrological connectivity, disturbance (including aircraft noise, lighting and bird disturbance), together with other ecological pathways identified through the biodiversity assessment and supporting technical assessments.
Current assessment position	Based on the assessment completed to date, the Appropriate Assessment indicates that the Proposed Order will not adversely affect the integrity of any European site, either alone or in combination with other plans or projects, having regard to the conservation objectives of those sites.
Measures / controls	No additional mitigation identified. The assessment assumes the continuation of existing operational controls and committed measures forming part of the anticipated 2029 baseline.

5.6 Water Framework Directive Assessment

The WFD Assessment provides the information necessary to determine whether the Proposed Order is consistent with the objectives of the Water Framework Directive, including the obligations to refuse authorisation for a project where it may cause the deterioration of the status of surface water and groundwater bodies or where it jeopardises the attainment of good surface water status or of good ecological potential and good surface water chemical status and includes the information required by section 13(2)(b)(vi) - (vii) of the Act. The assessment considers relevant surface water and groundwater bodies, protected areas, waterbody status, hydromorphology, water quality, hydrology, hydrogeology and flood risk, together with the effects of the Proposed Order on Water Framework Directive objectives.

The WFD Assessment is informed by the water environment assessment, drainage information, flood risk assessment and de-icer modelling. De-icer modelling predicts how aircraft and airfield de-icing chemicals behave in the environment and assesses their potential effects on receiving waters. Based on the assessment completed to date, the Proposed Order is not expected to cause deterioration in the status of any surface water or groundwater body or prevent the achievement of Water Framework Directive objectives. Existing and proposed drainage infrastructure, pollution control measures, operational water management measures have been taken into account in the assessment.

Table 5.5 Water Framework Directive Assessment Summary

Assessment purpose	To determine whether the Proposed Order is consistent with the objectives of the Water Framework Directive, including the prevention of deterioration in the status of surface water and groundwater bodies and the achievement of relevant environmental objectives.
Scope	Relevant surface water and groundwater bodies, including the Cuckoo Stream, Forrest Little Stream, Kealy Stream, Santry River and Mayne catchments, together with the Dublin, Swords and Industrial Facility groundwater bodies. The assessment considers water body status, protected areas, hydromorphology, water quality, hydrology, hydrogeology, flood risk, mitigation and monitoring.
Evidence base	Assessment in the Water chapter of the EIAR, drainage studies, flood risk assessment, de-icer modelling, surface water quality monitoring, operational water management evidence and River Basin Management Plan objectives.
Current assessment position	Based on the assessment completed to date, the Proposed Order will not cause deterioration in the status of any surface water or groundwater body or jeopardise the attainment of good surface water status or of good ecological potential and good surface water chemical status under the third River Basin Management Plan (2022–2027).
Measures / controls	The assessment has been undertaken on the basis of the 2029 baseline, including existing drainage infrastructure, de-icer management measures and operational water management controls, together with those expected to be in place by 2029 independently of the Proposed Order. Any additional mitigation or monitoring identified through the WFD Assessment will be secured through the appropriate statutory or regulatory mechanisms.

5.7 Information Sufficiency and Statutory Discretion

The information contained in this application comprehensively sets out the details required under sections 7(2) and 12(2) of the Act and is supported by robust, recent and reliable operational, technical, environmental, aviation, surface access, economic and planning data. Taken together, that information provides a comprehensive evidential basis on which the Minister may determine that he should proceed to issue a notice under section 7(5) of the Act. The information contained in this application is not intended to substitute for the EIAR, NIS or WFD assessment. Rather, it is intended to satisfy the information requirements applicable at this stage of the statutory process.

To date, no significant technical difficulties or deficiencies in available information have been identified that would preclude a robust assessment of the likely significant environmental effects of the Proposed Order, having regard to the requirements of this stage of the statutory process.

5.8 Environmental Assessment Findings to Date

The environmental assessment undertaken to date indicates that the Proposed Order is not likely to give rise to significant adverse effects on the environment. The likely environmental effects have been systematically identified and assessed having regard to the operational characteristics of the Proposed Order, the receiving environment and the requirements of the Act and other relevant environmental legislation. Based on the assessments undertaken to date, no likely significant adverse residual environmental effects have been identified. Based on the work completed to date, it is expected that the NIS will conclude that the Proposed Order will not adversely affect the integrity of any European site, either alone or in combination with other plans or projects. It is also expected that the Water Framework Directive Assessment will conclude that the Proposed Order will not cause deterioration in the status of any surface water or groundwater body or prevent the achievement of Water Framework Directive objectives.

Collectively, the environmental information presented within this Application Document, together with the ongoing preparation of the EIAR, NIS and WFD Assessment, demonstrates that the likely environmental effects of the Proposed Order have been identified and that an appropriate scope and level of detail has been established for the environmental assessment, having regard to the characteristics of the Proposed Order, the receiving environment and the requirements of the Act and relevant guidance. daa considers that this information satisfies the requirements of section 12(2) of the Act and provides an appropriate basis for the Minister's consideration of the matters referred to in section 12.

The proposed scope of the EIAR provides a comprehensive and proportionate framework for the identification, description and assessment of the likely significant environmental effects of the Proposed Order and is sufficient to enable ACP to undertake a robust Environmental Impact Assessment under section 13 of the Act.

Chapter 6: Conclusion

daa proposes the making of a Ministerial Order amending the existing passenger capacity conditions at Dublin Airport from 32 mppa to 40 mppa, and that this amendment would apply to Dublin Airport as a whole. For the reasons set out in this report (and as summarised below), the existing passenger capacity conditions are no longer an appropriate means of controlling airport activity.

Further, and in order to ensure clarity and avoid ambiguity, the enumeration of passengers as provided by the Order, would be based on the definitions of All Passengers on Board provided within Eurostat Reference Manual on Air Transport Statistics, which is the format used by daa when reporting passenger numbers to the CSO as required by the Member state under Regulation (EC) No 437/2003.

The case for amendment is compelling when the report is considered as a whole. In summary:

- **The existing passenger capacity conditions are a historic planning control imposed in a materially different context.** As explained in Chapter 2, the 32 mppa threshold was imposed when Dublin Airport was handling approximately 18 mppa and was set as a forward-looking planning safeguard by reference to road capacity and the prevailing planning policy, rather than as a detailed operational framework for managing passenger throughput in real time, particularly 20 years' on from the attachment of the existing passenger capacity conditions.

- **Current and forecast demand now materially exceed 32 mppa.** Chapter 2 identifies recent passenger throughput above the threshold, including approximately 36.4 mppa in 2025, and Chapter 4 explains the defined 40 mppa operational scenario used as the assessment basis. The issue is therefore current and near-term, not speculative.

- **Consequences for the travelling public if passenger numbers are required to be reduced.** If the existing passenger capacity conditions are not amended, and the IAA is required to factor those conditions into future seasonal capacity decisions, this will result in a reduction of over 4 million passengers over a short period of time (potentially six months) in the near future. Further, based on current demand, Dublin Airport is forecast to reach 40 mppa by 2029. If the passenger capacity conditions are not amended, this means that approximately a further 3.5 million people will be unable to travel. This will have enormous social and other consequences, inevitably leading to higher prices for the travelling public where demand grossly outweighs supply.

- **The timing imperative is acute.** Chapter 3 explains that airline scheduling and slot-coordination decisions are made significantly in advance of the relevant operating season. If the existing passenger capacity conditions remain unresolved when the next coordination schedule is prepared, the consequences as described above may arise before the relevant passenger year concludes.

- **The Infrastructure Application does not resolve the immediate timing risk.** Chapter 3 explains that the Infrastructure Application concerns physical airport infrastructure and is likely to require considerable time through separate planning, aircraft-noise and appeal processes. The existing passenger capacity issue arises on a shorter operational timetable and is therefore properly addressed through the statutory mechanism established by the Act.

- **Retention of the 32 mppa threshold risks serious harm within the categories identified by section 25(2) of the Act.** Chapter 3 explains that, if the existing passenger capacity conditions are required to be reflected in future airport capacity declarations, passenger throughput would have to reduce materially. This would result in millions of fewer passenger journeys, pending a positive outcome for, and implementation of, the Infrastructure Application, and Dublin Airport would not be prevented from meeting current and predicted demand levels. The practical consequence is that many people who would otherwise have travelled will be

unable to do so, while those who continue to travel are likely to face reduced choice and higher prices. Chapter 3 also explains the consequences for the economy of the State, international connectivity and the international reputation of the State in respect of air transport, including impacts on tourism, trade, investment, labour mobility, passenger choice, airline confidence, hub development and Ireland's peer-airport competitiveness.

- **Amendment is consistent with relevant policy.** Chapter 3 identifies support across national, regional, local and sectoral policy for Dublin Airport's role as strategic national infrastructure, including its function in supporting sustainable growth, international connectivity, economic competitiveness, tourism, trade and investment.
- **The proposed amendment to 40 mppa is supported by the technical-capacity evidence.**
- **Other statutory and regulatory controls remain in place.** The Proposed Order would not interfere with, override or supersede any consent, permission, licence, regulatory decision, operating restriction, mitigation requirement or statutory function governed by another enactment or competent authority.

The Proposed Order is therefore targeted and coherent. It is confined to the amendment of the existing passenger capacity conditions. It does not authorise physical development, infrastructure works, aircraft-noise operating restrictions, slot allocation decisions or any other consent outside the Act.

daa trusts that this application provides a sufficient basis for the Minister to issue a notice under section 7(5) of the Act of his intention to accept or vary daa's proposal and to make an order under section 25(1) to amend the existing passenger capacity conditions.

APPENDICES



Appendix I: Statutory Compliance Checklist

Relevant section of the Act	Statutory information requirement	Where addressed in this report	Information provided
Section 7(2)(a) / section 7(2: application information requirements	Identification of the existing passenger capacity conditions to which the application relates.	Sections 1.2, 2.2 and Appendix I.	The report identifies the relevant Terminal 2 and Terminal 1 Extension planning permissions, the condition numbers, the wording of the existing passenger capacity conditions, the stated reasons for those conditions and the statutory definition of a passenger capacity condition.
Section 7(2) and section 25 — proposed Ministerial Order	The proposed Ministerial Order and whether the existing passenger capacity conditions are proposed to be amended.	Sections 1.3, 1.4, 1.5 and 1.6.	The report states that daa seeks amendment of the existing passenger capacity conditions, explains the nature and manner of amendment.
Section 7(2): manner of amendment	The manner in which the existing passenger capacity conditions are proposed to be amended.	Section 1.5; also, sections 4.2, 4.3 and 4.4.	The report explains that the existing passenger capacity conditions would be amended; that the likely significant effects of amendment to 40mppa are assessed; and that mitigation, monitoring and controls would operate through the Ministerial Order were permitted and otherwise through the relevant statutory or regulatory regimes.
Section 7(2): reasons and justification	The reasons and justification for the application.	Chapter 3, especially sections 3.1, 3.2, 3.3 and 3.4; Chapter 6.	The report sets out the strategic role of Dublin Airport, current demand above 32 mppa, urgency and timing considerations, consequences of inaction, serious-harm categories, and consistency with relevant Government, national, regional, local and sectoral policy.
Section 25(2)(a) to (c): serious harm to the economy of the State, international connectivity, and the international reputation of the State in respect of air transport	Information relevant to serious harm, including harm to the economy of the State, international connectivity and the international reputation of the State in respect of air transport.	Section 3.3; Chapter 6; Appendix III.	Section 3.3 is organised by reference to the section 25(2)(a) to (c) serious-harm categories and identifies practical consequences for the economy of the State, international connectivity, and the international reputation of the State in respect of air transport, including current-demand displacement, foregone future growth, airline confidence, tourism, trade, investment, labour mobility and peer-airport competitiveness. Appendix III provides the detailed economic case.
Section 7(2): plans, policies and strategies relied upon	Relevant Government, national, regional and local plans, policies or strategies relied upon.	Section 3.4.	The report identifies policy support for amendment by reference to the Revised National Planning Framework / Project Ireland 2040, RSES for the Eastern and Midland Region, National Aviation Policy, Programme for Government, Fingal Development Plan, Dublin Airport Local Area Plan and local economic policy.
Section 7(2) and section 12(2): operational assumptions / assessment basis	The operational scenario and assumptions forming the basis of the assessment.	Sections 1.4, 1.5, 4.2, 4.3 and 4.4.	The report identifies the defined assessment scenarios, the passenger enumeration basis, the defined 40 mppa operational scenario, forecast growth assumptions, runway-use and aircraft-noise assumptions. Section 4.3 includes a detailed scenario table identifying scenario name and description, key assumptions, passenger throughput and details for daytime and night-time ATMs to be populated from the agreed operational schedules.
Section 7(2) and section 12(2): technical-capacity information	Technical-capacity information supporting the assessment basis.	Section 4.2 and Appendix IV.	The report explains that the estimated capacity of the existing facilities, infrastructure, operational processes and current demand profile of Dublin Airport in 2026 is 40.5 mppa

Relevant section of the Act	Statutory information requirement	Where addressed in this report	Information provided
Section 12(2): environmental information identifying likely significant effects	Information identifying, describing and assessing the likely significant environmental effects of the Proposed Order, including the basis on which those effects are assessed.	Chapter 5, especially sections 5.1, 5.2, 5.3, 5.4, 5.5 and 5.6; Table 5.1, Table 5.2 and Table 5.3.	The report summarises the environmental information available at application stage by reference to the defined assessment scenarios and 40 mppa operational scenario, including EIA topic-by-topic information, NIS / Appropriate Assessment information and WFD assessment information. Table 5.1 is expressly framed as an application-stage summary for the purposes of sections 7(2) and 12(2), identifying EIA effect pathways, receptors, methodology, current assessment position and mitigation / monitoring / control status by topic. Tables 5.2 and 5.3 summarise the NIS / Appropriate Assessment and WFD positions respectively. Final conclusions remain subject to completion of the EIAR, NIS and WFD Assessment and any further information, consultation or assessment required by the Minister or ACP.
Section 12(2) — relationship between application-stage environmental information and EIAR / NIS / WFD submission to ACP	Information explaining how the application-stage material supports the next stage of the statutory process and the Minister's decision to issue a notice under section 7(5).	Sections 1.1, 1.7, 5.5, 5.6 and Chapter 6.	The report explains that the application-stage information is intended to support the Minister's consideration of the application. It confirms that the application-stage material is not intended to substitute for, or prejudge, the EIAR, NIS or WFD Assessment to be considered by ACP.
Section 25 and other statutory regimes / non-interference principle	Other statutory and regulatory controls that will continue to apply following amendment.	Sections 1.4, 1.5, 2.3, 4.5 and Chapter 6.	The report confirms that the Proposed Order would not interfere with, override or supersede any consent, permission, licence, regulatory decision, operating restriction, mitigation requirement or statutory function governed by another enactment or competent authority.
Sections 7(2), 12(2) and section 25, including section 25(2) order-making considerations	Confirmation that the report contains sufficient application-stage information for the Minister to progress the statutory process and, following completion of that process, to consider the section 25 order-making criteria.	Sections 1.1, 1.7, 5.5, 5.6 and Chapter 6.	The report states that the information provided is intended to satisfy the application-stage requirements of the Act and to support a Ministerial determination to issue a notice under section 7(5). It also identifies the section 25(2) matters relevant to the final order-making stage.

Appendix II: Slot Coordination and the Role of daa

daa cannot control or limit activity at Dublin Airport.

Dublin Airport is a coordinated airport for the purposes of the EU Slot Regulation (Council Regulation (EEC) No. 95/93) (the EU Slot Regulation). The Slot Regulation provides for a system of capacity determination and slot allocation in the EU.

At coordinated airports, such as Dublin Airport, coordination parameters that determine the capacity at the airport must be set at least twice a year. Those parameters must express in operational terms the capacity available for slot allocation at an airport during the coordination period. In Ireland, the role of determining the capacity of Dublin Airport through the setting coordination parameters has been exclusively assigned to the IAA.

Article 4 of the Slot Regulation requires that the role of allocating slots is conferred on an independent Airport Coordinator and, in Ireland, that role is conferred on Airport Coordination Limited ("ACL"). ACL has sole responsibility for allocating slots and is required to allocate all slots available under the coordination parameters for Dublin Airport as set by the IAA, where there are requests from airlines for those slots.

It follows that, in setting the coordination parameters for Dublin Airport, the IAA is determining the number of slots that must be allocated by ACL to airlines at Dublin Airport. This is the determining factor with respect to the number of flights that operate at Dublin Airport. It is the primary determining factor with respect to the number of passengers that use the terminals at Dublin Airport. The other key factor, being the number of seats sold by airlines on flights operated pursuant to those slots, is also outside the control of daa.

daa is the "managing body of an airport" within the meaning of Article 2(j) of the Slot Regulation. daa is also a member of the Coordination Committee for Dublin Airport, established for the purposes of Article 5 of the Slot Regulation, and fulfils the role of Chair of that Committee. However, daa has not been assigned any functions as regards the determination of capacity through the setting of coordination parameters.

In particular, daa has not been conferred with any power under domestic or EU law, in its role as the managing body of Dublin Airport, as a member of the Coordination Committee, or at all, that would permit it to interfere with:

a. the setting of Coordination Parameters by the IAA under Article 6 of the Slot Regulation.

b. the allocation of slots by ACL under Articles 8 and 10 of the Slot Regulation.

c. the number of seats sold by airlines on flights that are allocated slots at Dublin Airport under the Slot Regulation, or

d. the operation of slots that are allocated to airlines at Dublin Airport under the Slot Regulation (whether by way of the closure of Dublin Airport or otherwise).

On the basis of the above, it is therefore not within the power of daa to control flight activity at Dublin Airport.

Appendix III: Detailed Economic Case

This assessment supports daa's application to the Minister to amend the existing passenger capacity conditions at Dublin Airport. It assesses the economic effects of the 32 mppa conditions being retained against a scenario in which Dublin Airport can accommodate demand-led growth to 40 mppa. The assessment is prepared from the applicant's perspective but is framed objectively and by reference to published evidence.

1. Statutory Decision-Making Context

The Dublin Airport (Passenger Capacity) Act 2026 is framed by reference to the public interest and to the strategic importance of Dublin Airport in supporting international connectivity, trade, tourism, investment and the movement of persons and cargo to, from and within the State. It also requires any Ministerial Order to consider an environmental condition recommended by the Commission[13].

The central economic question is whether retaining the existing passenger capacity conditions at 32 mppa would materially constrain economic activity, connectivity and the wider public interest, and whether amending them would better support national economic objectives.

2. Assessment Approach

The assessment is based on existing published sources only[14]. The principal Dublin-specific evidence is the InterVISTAS Dublin Airport Economic Impact Study 2023, which estimates direct, indirect, induced and catalytic impacts in terms of employment, FTEs, wages and Gross Value Added ("GVA")[15].

The study assesses future economic contribution and foregone activity under constrained capacity and growth capacity assumptions.[15] The constrained scenario is the application of the 32mppa conditions. The growth scenario is the ability to accommodate demand-led passenger growth at an average rate of 2.1% p.a. (post 2022)[15]. Economic effects are assessed by comparing the likely consequences of those scenarios.

Catalytic impacts are quantified using research-based parameters linking air connectivity and economic growth, while recognising that aviation facilitates, rather than alone generates, wider economic activity in tourism, trade, investment and productivity.

3. Economic Effects of Retaining the 32mppa Conditions

Dublin Airport is a major national economic asset. InterVISTAS reports that, in 2022, the airport facilitated approximately 116,100 jobs in the State and contributed €9.6 billion in GVA, equivalent to approximately 2.3% of national economic output.[2] This includes direct airport activity, supply-chain effects, employee-spending effects and catalytic activity linked to tourism, trade, investment and productivity.[15]

On that evidence, retaining a binding 32mppa condition would suppress economic activity that would otherwise be supported by additional passenger and air service growth. InterVISTAS estimates that maintaining the cap would result in Ireland foregoing approximately 17,800 jobs and €1.5 billion in GVA

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[13] https://www.irishstatutebook.ie/eli/2026/act/25/enacted/en/pdf Section 25(3)

[14] The Economic Impact Study referenced in this Application was commissioned by daa in 2023 and is based on 2022 passenger traffic levels of 28.1 million passengers per annum (mppa). As such, it does not assess the economic effects of a reduction in passenger activity from current traffic levels to 32 mppa. Rather, the assessment examines the implications of retaining the 32 mppa passenger cap through a comparison of constrained and growth scenarios at future assessment years (2030 and 2055).

[15] InterVISTAS Consulting, Dublin Airport Economic Impact Study 2023, prepared for daa plc; Dublin Airport, Economic Impact Studies.

by 2030, rising to approximately 53,300 jobs and €4.4 billion in GVA by 2055.[15] These figures are modelled estimates and should be treated as scenario-based, but they provide the clearest quantified indication of economic harm.

This is also consistent with EU aviation policy. The European Commission describes aviation as the backbone of EU and global connectivity, linking countries, people and businesses, and as a strategically important sector that drives economic growth and employment.[16] Its Aviation Strategy for Europe also identifies capacity, efficiency and connectivity constraints as limits to aviation growth, noting that airport capacity constraints in the EU could cost up to 818,000 jobs by 2035.[17]

There is also a potential consumer welfare effect. SEO Amsterdam found that, when airport capacity is insufficient to accommodate all passenger demand, the excess demand allows airlines to increase their air fares, controlling for other fare drivers. There is an estimated €2.1 billion annual fare premium at congested European airports, potentially rising to €6.3 billion by 2035.[18] This is not a Dublin-specific estimate, but it supports the case that capacity scarcity can reduce competition and increase costs for passengers and businesses.

There is a further structural risk. IATA has warned that uncertainty around Dublin Airport capacity may cause airlines to allocate aircraft, crews and future schedules to alternative airports, with decisions becoming difficult to reverse once embedded in slot and network planning cycles.[19] This is most relevant to new or expanded long-haul services, where aircraft allocation decisions are strategic and multi-year.

Furthermore, lost connectivity and economic activity is foregone, rather than deferred. Oxera notes that air traffic demand is asymmetric as passenger volumes can fall sharply due to external shocks but operational, infrastructure and slot constraints limit the ability of airports to recover equivalent traffic subsequently.[20]

There is also a material cargo implication. [21] at Heathrow indicates that constraining a country's main airport can have cargo impacts well beyond the airport boundary including reduced bellyhold capacity, diversion of freight to alternative gateways, higher logistics costs, longer transit times and reduced access to long-haul networks that underpin high-value, time-sensitive sectors. This is relevant in an Irish context given Dublin Airport's role as the State's primary gateway for air freight cargo.

The stated purpose of the Act is to enable a Ministerial decision that takes into account Dublin Airport's strategic role in supporting connectivity, trade, tourism and investment[1]. Retaining the existing binding 32mppa passenger capacity conditions would be inconsistent with that objective. The Minister has also identified the cap as creating risks for international business and tourism if enforced[22].

The existing passenger capacity conditions are a live constraint rather than an abstract policy issue. The CSO reported that a record 43.5 million passengers used Ireland's five main airports in 2025, 6%

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[16] European Commission, Air: Mobility and Transport, describing aviation as the backbone of EU and global connectivity and a driver of economic growth and employment.

[17] European Commission, Commission presents a new Aviation Strategy for Europe, IP/15/6144, 7 December 2015.

[18] SEO Amsterdam Economics and Cranfield University, The Impact of Airport Capacity Constraints on Air Fares, commissioned by ACI Europe, 2017.

[19] IATA, Statement on the General Scheme of the Dublin Airport (Passenger Capacity) Bill 2026, Joint Oireachtas Committee on Transport, 25 March 2026.

[20] Oxera, Analysis of the distribution of passenger risk at Dublin Airport, 2026

[21] Implications for the Air Freight Sector of Different Airport Capacity Options

[22] Dáil Éireann debate on Dublin Airport (Passenger Capacity) Bill 2026, 23 June 2026; RTÉ News, Dublin Airport passenger cap "does not serve State well", 24 June 2026.

higher than 2024, with Dublin handling 83% of all flights.[23] Department of Transport airport statistics report that Dublin Airport handled 36.4 million passengers in 2025, compared with 34.6 million in 2024, representing a 5% annual increase.[24] This demonstrates that demand through Dublin Airport is already materially above the 32mppa condition.

4. Economic Implications of Amending the Constraint

The economic case for amending the existing passenger capacity conditions follows directly from the constrained-case harms identified above. The benefit is not a separate or additional category of impact to be counted again; it is principally the avoidance of foregone employment, GVA, connectivity and wider economic activity that would arise if the 32mppa cap remained binding.

On that basis, the quantified economic benefit is the avoided loss identified in the InterVISTAS constrained scenario. IATA's national evidence reinforces the scale and strategic importance of aviation in Ireland, estimating that air transport supports approximately 128,200 jobs and contributes USD 20.2 billion to Ireland's GDP, including aviation-enabled tourism.[25]

The tourism, trade and Foreign Direct Investment ("FDI") implications should therefore be understood as consequences of avoiding suppressed connectivity. Tourism Ireland's target of more than €10 billion in annual overseas visitor spend by 2031, and IDA Ireland's 2025-2029 targets for investment, RD&I and employment, both depend in part on reliable international access given Ireland's island geography.[26,27]

The link to Dublin Airport is particularly direct for tourism. Fáilte Ireland estimates that overseas tourists generated €2.4 billion in revenue in Dublin in 2024, with 4.1 million overseas tourists visiting Dublin.[28] At national level, Fáilte Ireland estimates that out-of-state tourist expenditure amounted to €6.6 billion in 2024, with total tourism valued at almost €12 billion annually and every €1 million of tourist expenditure supporting approximately 20 tourism jobs.[29] CSO aviation statistics also show that more than 1.2 million additional passengers travelled to Ireland in 2025 compared with 2024, reinforcing the direct relationship between air access and inbound visitor flows.[30]

The trade and FDI context also support the economic importance of connectivity, while not proving direct causation. Boeing highlights that though less than 1% of trade volumes are transported via air, air freight commodities tend to be perishable, high-value, or time-sensitive goods which collectively generate around 35% of world trade value[31]. IDA Ireland reported that employment in IDA client companies reached 302,566 in 2024, with 234 investments won and associated future job creation of

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[23] Central Statistics Office, Aviation Statistics Quarter 4 and Year 2025, 16 April 2026.

[24] Department of Transport, State Airport Aviation Statistics Quarter 4 2025 Report; Dublin Airport, Record 36.4 million passengers travelled through Dublin Airport in 2025, 16 January 2026.

[25] IATA, The Value of Air Transport to Ireland, incorporating Oxford Economics data, 2023.

[26] Tourism Ireland, Tourism Ireland launches 2026 marketing plans, 19 January 2026.

[27] IDA Ireland, Adapt Intelligently: A Strategy for Sustainable Growth and Innovation, 2025–2029; IDA Ireland, IDA Ireland launches new five-year strategy, 19 February 2025.

[28] Fáilte Ireland, Key Tourism Facts 2024: Dublin.

[29] Fáilte Ireland, Key Tourism Facts 2024: National Summary.

[30] Central Statistics Office, Aviation Statistics Quarter 4 and Year 2025, 16 April 2026.

[31] Boeing, World Air Cargo Forecast 2024-2043

13,500.[32] For an open economy operating at this scale, reliable international connectivity through Dublin Airport is a relevant enabling condition for enterprise, investment and trade-facing sectors.

These wider benefits are best framed as evidence-based connectivity and competitiveness effects that support the public interest case for amending the constraint.

This is consistent with the National Aviation Policy for Ireland, which identifies enhancement of Ireland's connectivity, growth of aviation enterprise and maximisation of aviation's contribution to national economic growth and development as principal policy goals.[33] As identified by InterVISTAS, the existing passenger capacity conditions contradict these aims as it limits growth of air services and international connectivity15[15].

5. Evidential Considerations

The following considerations inform the weight to be placed on the evidence. They do not alter the overall conclusion that retaining the existing 32mppa passenger capacity conditions is likely to create material economic and connectivity harm.

- The quantified estimates are based on published modelling and depend on assumptions about passenger demand, airline behaviour, visitor spend, productivity effects and the relationship between throughput, jobs and GVA. They are therefore best treated as evidence-based estimates rather than precise predictions.
- Wider European and global studies are used to explain the economic mechanisms through which airport capacity and connectivity affect competitiveness, fares, tourism, trade and investment. The Dublin-specific quantified evidence remains the principal basis for the assessment.
- Some displaced demand may be accommodated through alternative routings or at airports within the State, rather than being wholly lost. In practice, displacement to regional Irish airports is unlikely to provide a full substitute for airlines, in terms of Dublin Airport's route network, frequency, hub connectivity and long-haul services. Accordingly, displacement may reduce, but is unlikely to eliminate, economic harm where connectivity, visitor spend, business access or strategic route development is lost to the State or materially reduced in quality.

6. National Policy and Public Interest Assessment

The economic evidence supports the conclusion that the existing 32mppa passenger capacity conditions are likely to impose a material constraint on the State's principal international gateway. The strongest evidence is Dublin-specific and quantitative: the airport already supports a large national economic footprint, and InterVISTAS identifies significant foregone jobs and GVA if the existing passenger capacity conditions are maintained.[2]

Irish and EU policy documents emphasise the importance of connectivity, tourism growth, trade, foreign direct investment, enterprise development and wider economic benefit[34]. Against that backdrop, daa considers the retention of a binding passenger cap to be at odds with those wider policy objectives, nevertheless daa has applied to amend to 40mppa.

EUROCONTROL's 2024 long-term outlook reinforces that capacity constraints are a forward-looking network issue. It forecasts 15.4 million flights in Europe by 2050 under its base scenario, a 52% increase

[32] IDA Ireland, Annual Report 2024.

[33] Department of Transport, National Aviation Policy for Ireland, August 2015

[34] Government of Ireland / Department of Enterprise, Tourism and Employment, A New Era for Irish Tourism: National Tourism Policy Statement, 2025;

on 2023 levels, and identifies a projected capacity gap of approximately 1.1 million flights where demand exceeds capacity at key airports.[35] This does not quantify a Dublin-specific impact, but it supports the conclusion that airport capacity constraints should be assessed as strategic, long-term economic and connectivity risks.

The conclusion is that the existing passenger capacity conditions create a material risk of avoidable economic and connectivity harm. Amending them would remove that constraint and allow market demand to be accommodated.

7. Conclusion: Key Economic Considerations

The economic assessment supports amending the existing passenger capacity conditions. The evidence indicates that retaining a binding 32mppa cap would be likely to constrain economic activity, connectivity and national policy objectives, while enabling growth would avoid substantial foregone economic activity and support wider public interest objectives.

- The most important, quantified consideration is the InterVISTAS estimate that retaining the cap could result in Ireland foregoing approximately 17,800 jobs and €1.5 billion in GVA by 2030, with larger losses projected by 2055[15].
- Connectivity constraints cut directly across EU policy objectives for growth, jobs and global competitiveness[17].
- Capacity uncertainty risks pushing airline investment elsewhere, with strategic long-haul decisions particularly difficult to reverse once made[18].
- Constrained connectivity means permanent foregone opportunity, not deferred demand[20].
- Capacity scarcity may also affect consumer welfare by limiting competition and contributing to higher fares, although the available fare evidence is European rather than Dublin-specific.[19]
- Limiting capacity risks higher freight costs, longer transit times and reduced connectivity for time-sensitive cargo sectors[22].
- The tourism case is strong because Dublin alone attracted 4.1 million overseas tourists and €2.4 billion in overseas tourist revenue in 2024, while national out-of-state tourist expenditure was estimated at €6.6 billion; CSO aviation statistics show more than 1.2 million additional passengers travelled to Ireland in 2025 compared with 2024.[27, 28, 29]
- The FDI and trade case is material but should be framed as an enabling effect, supported by the high-value air freight export base and IDA client employment, rather than a direct quantified passenger-cap impact[30 & 31].
- Official CSO and Department of Transport data show that national and Dublin Airport passenger demand reached record levels in 2025, confirming that the constraint is operationally live.[29 & 31]
- The main limitations are modelling uncertainty, possible displacement, transferability of non-Dublin evidence, and the need to avoid double counting catalytic impacts.

Subject to those limitations, the balance of evidence supports the conclusion that amending the existing passenger capacity conditions would better serve the economic public interest than retaining a binding 32mppa cap.

[35] EUROCONTROL, Aviation Long-Term Outlook: Flights and CO_2 emissions forecast 2024-2050, published 19 December 2024.

Appendix IV: Infrastructure Capacity Assessment

July 2026 | FINAL

Dublin Airport

Annual Capacity Assessment

Prepared for:

daa

Prepared by:

RICONDO

Ricondo & Associates, Inc. (Ricondo) prepared this document for the stated purposes as expressly set forth herein and for the sole use of daa and its intended recipients. The techniques and methodologies used in preparing this document are consistent with industry practices at the time of preparation and this Report should be read in its entirety for an understanding of the analysis, assumptions, and opinions presented. Ricondo & Associates, Inc. is not registered as a municipal advisor under Section 15B of the Securities Exchange Act of 1934 and does not provide financial advisory services within the meaning of such act.

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EXECUTIVE SUMMARY

Ricondo & Associates, Inc. (Ricondo) was engaged by daa to establish the current capacity of the existing facilities and infrastructure at Dublin Airport (DUB or the Airport). The capacity assessment is a partial update to the previously completed baseline capacity assessment included in the Capacity Assessment Report for the 40 million passengers per annum (MPPA) Infrastructure Application (IA) submitted by daa to Fingal County Council (FCC) in December 2023 (the 2023 Capacity Report).

The purpose of the existing capacity assessment is to define the annual passenger demand volume that Dublin Airport could accommodate with existing facilities and infrastructure and the current profile of demand as of the date of the report. The existing capacity assessment does not include assumptions about facilities and infrastructure improvements or changes in the demand profile that could occur in the future.

CAPACITY ASSESSMENT METHODOLOGY

This assessment follows standard methodologies for determining airport capacity, as defined by the International Air Transport Association (IATA) Airport Development Reference Manual (ADRM), 12th Edition. The IATA ADRM provides guidelines, recommendations and standards for the planning, design and development of airport facilities, including airside and terminal infrastructure. The document was first published in the 1970s and is recognised as one of the aviation industry's most important guides for airport development planning.

The updated capacity assessment report estimates the capacity of Dublin Airport facilities, infrastructure, and equipment relevant to passenger capacity as of the date of this report. Any areas undergoing construction were assumed to be as configured prior to start of construction.

Airport capacity is dynamic and subject to a wide range of factors that can vary over time. These include patterns of demand, such as seasonality or flight schedules, which can change the relationship between peak hour and annual volumes; or capacity factors, such as technology and innovation in airport and airline business practices, which can improve the throughput of existing facilities. The capacity assessment methodology uses historical Dublin Airport operational data through December 31, 2025, and observational studies of individual processing functions to provide the modelling inputs and assumptions used in the IATA ADRM methodologies for capacity assessment. The observational studies were completed prior to the 2023 Capacity Report and were not updated as part of this assessment.

DEFINING CAPACITY

In the context of this report, capacity represents the ability of the on-airport facilities and infrastructure to accommodate a maximum annual volume of passengers flying on commercial airlines. As illustrated in **Exhibit E.1**, the full airport campus contains a broad interconnected system of landside, terminal, pier, apron, and airfield facilities and infrastructure, collectively serving a diverse range of needs from different users of the airport.

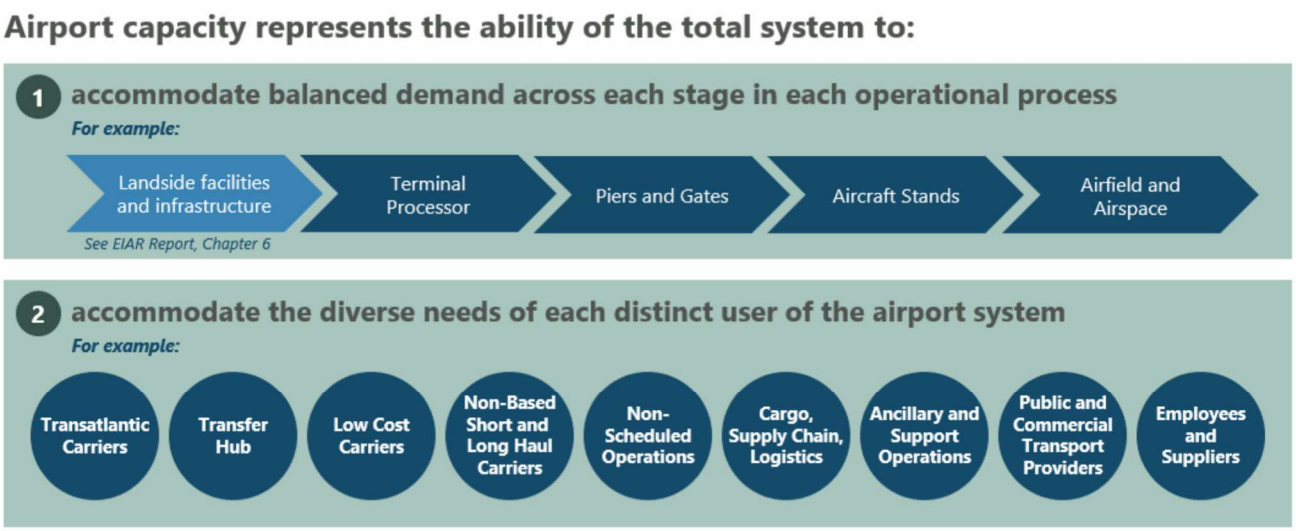
No single element of the system defines the total airport capacity. There are two key considerations in establishing the capacity of the system:

- **Individual sequential processes** – capacity is determined by the lowest performing step in the process. Increasing the capacity of the lowest performing step moves the capacity limitation to the next lowest performing step. Improving a single step in a sequential process to a target capacity level does not bring the whole process to the same level. Improvements are typically required across multiple elements of the system.

- **Multiple parallel processes serving different user needs** – Dublin Airport serves multiple airlines providing a diverse range of services, each with distinctly different facility and infrastructure needs. Projects that increase the capacity of processes serving one type of airline do not increase capacity for a different type of airline with different needs.

Demand from each distinct category of users grows in parallel and Dublin Airport needs to provide for the corresponding capacity needs of each group in parallel as demand grows.

EXHIBIT E.1: AIRPORT CAPACITY – A SYSTEM OF INFRASTRUCTURE SERVING DIVERSE USER NEEDS



SOURCE: Ricondo, **June 2026**.

CATEGORIES OF PASSENGERS

Dublin Airport serves four categories of commercial airline passengers, each of which utilise a different set of airport facilities and infrastructure:

- **Originating passengers**: departing passengers who begin their journey by accessing the airport using public or private ground transportation modes. Originating passengers utilise all major components of the airport system, flowing from landside ground transportation facilities through terminal departures processing to piers, boarding gates and aircraft stands, and onwards to the airfield.
- **Terminating passengers**: passengers arriving at the airport on an aircraft and completing the journey to their final destination by using public or private ground transportation. Terminating passengers utilise all major components of the airport system, flowing from the airfield to aircraft stands, disembarking via arrival gates and proceeding through terminal arrivals processing to the landside ground transportation facilities.
- **Transfer passengers**: arrive and depart the airport onboard two different aircraft. Transfer passengers utilise the airfield, aircraft stands, piers and gates, and transfer facilities. They do not utilise arrivals or departures terminal processing nor the landside ground transportation facilities.
- **Transit passengers**: arrive and depart the airport onboard the same aircraft. Unlike transfer passengers, transit passengers do not disembark the aircraft at Dublin Airport and utilise only the airfield and aircraft stand infrastructure.

This report uses the standard aviation method of counting passengers. Originating and terminating passengers are counted once, as either a departing or arriving passenger, respectively. Transfer passengers are counted

twice, as both an arriving and a departing passenger. Transit passengers are counted once since they remain on the same aircraft while at the airport.

DIFFERENCES BETWEEN THE 2023 AND 2026 CAPACITY ASSESMENTS

The capacity assessment completed in 2023 for the 40 MPPA Infrastructure Application (2023 Capacity Report) included a **Baseline Capacity** assessment and a separate assessment of the **Future Capacity** provided by the proposed 40 MPPA infrastructure. The 2026 Capacity Report assesses **Existing Capacity** only.

The differences between the **2023 Baseline Capacity** assessment and the **2026 Existing Capacity** assessment result from changes in the following three areas:

- **Equipment, Technology and Process Improvements** – changes that have been implemented within the footprint of existing functional areas since the submission of the 40 MPPA IA in 2023.
- **Demand Profile** – changes in the demand profile since the 2023 capacity assessment have increased the utilisation of available existing airport facilities and infrastructure, increasing the volume of demand that can be accommodated in a year. Demand profile factors include:
    - Distribution of demand – higher levels of growth in off-peak or less busy periods has increased the utilisation of existing airport facilities and infrastructure.
    - The average number of seats per aircraft has increased the number of available seats per occupied aircraft stand and boarding gate.
    - The average seat load factor – average percent of aircraft seats occupied – plus the increased average number of seats, has increased the number of passengers accommodated per aircraft stand and boarding gate.
- **Existing vs. Baseline**:
    - The **2023 Capacity Report** established **Baseline Capacity** – the capacity of the existing airport system, including planned future equipment and technology deployment and operational improvements expected to be implemented within the footprint of existing functional areas.
    - The **2026 Capacity Report** establishes **Existing Capacity** – the capacity of the existing airport system, without planned future equipment or technology deployment, or operational process changes, and based on the current actual demand profile The purpose of the 2026 Existing Capacity Report is present airport capacity as of the date of the report.

Table E.1 presents examples of changes that have occurred in each category. A detailed comparison between the 2023 and 2026 Capacity Reports for each functional area is provided in **Appendix B**.

TABLE E.1: EXAMPLES OF DIFFERENCES BETWEEN THE 2023 AND 2026 CAPACITY REPORTS

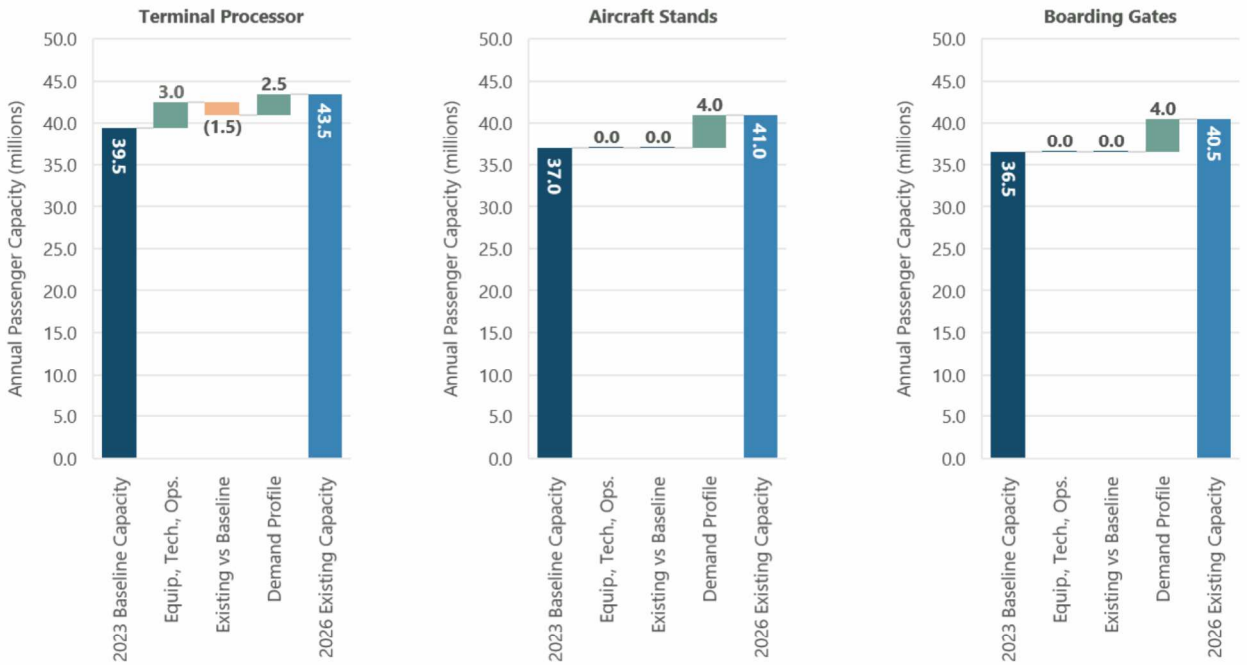
CATEGORY	EXAMPLE
Equipment, Technology and Operational Improvements	daa has deployed C3 cabin baggage screening equipment in Terminals 1 and 2, increasing the capacity of the central search facilities.
Demand Profile	Average number of seats per aircraft and load factor during a busy day at Dublin Airport has increased since 2019, the last year of the dataset analysed in the 2023 Capacity Report. The average aircraft now has five more seats and the average load factor during a busy day has increased from 90% to 94%. In combination, each flight has an average of 11 more passengers per aircraft movement or an additional 9,500 passengers during a busy day on the same number of aircraft stands.
Existing vs. Baseline	The 2023 Capacity Report included the then planned future Apron 5H in the baseline capacity. The 12 aircraft stands of Apron 5H have since been completed and are included in the 2026 Capacity Report. The 2023 Capacity Report included planned future check-in desk additions in Terminal 2. These additions have not yet been completed and are not included in the 2026 Capacity Report.

CAPACITY CONCLUSIONS

The estimated capacity of the existing facilities, infrastructure, operational processes and current demand profile of Dublin Airport in 2026 is **40.5 MPPA.** Existing capacity does not include currently under construction, planned future equipment deployment and operational improvements, or the infrastructure improvements proposed in the 40 MPPA IA.

Exhibit E-2 presents waterfall charts illustrating the change in capacity by category from 2023 Baseline to 2026 Existing for the Terminal Processor, Aircraft Stands, and Aircraft Gates functional areas.

EXHIBIT E.2: CAPACITY BY FUNCTIONAL AREA



Source: Ricondo analysis, June 2026

As illustrated in Exhibit E-2, aircraft boarding gates are the capacity limiting function, followed by aircraft stands, which can accommodate a 41.0 MPPA demand level. The combined processing capacity of Terminals 1 and 2 can accommodate a demand level of 43.0 MPPA.

The Exhibit E-2 waterfall also illustrates that planned improvements assumed in the 2023 baseline capacity for aircraft stands and boarding gates would not result in additional stand and gate capacity. The 2023 report included Apron 5H as a planned improvement. Apron 5H has been completed and is now operational, and there are no further planned improvements assumed in the 2023 report that would increase aircraft stand or boarding gate capacity.

Since aircraft boarding gates are the capacity limiting function, planned improvements assumed in the 2023 baseline capacity that have not yet been implemented would not increase the existing capacity of Dublin Airport beyond 40.5 MPPA.

Introduction

The capacity assessment determines the estimated annual passenger volume that can be accommodated at Dublin Airport. The assessment evaluates multiple factors that can vary over time, which results in an evolving picture of total capacity relative to previous assessments. For example, new technologies, airline product innovations, or new security mandates can increase or decrease the ability of the system to accommodate demand and can change how passengers flow through the airport system. For example, airline baggage policies are an important factor in the distribution of passenger volumes between check-in facilities and security screening.

Methodologies

Methods used to measure capacity can change over time or between interested parties. This assessment follows standard methodologies for determining airport capacity, as defined by the International Air Transport Association (IATA) Airport Development Reference Manual (ADRM), 12th Edition. The IATA ADRM document provides guidelines, recommendations and standards for the planning, design and development of airport facilities, including airside and terminal infrastructure. The document was first published in the 1970s and is recognised as one of the aviation industry's leading guides for planning new airports or expanding existing infrastructure. The 12th Edition includes several material changes to approaches compared to previous editions.

Demand Profile Considerations

The capacity of individual airport systems is generally expressed as the volume of demand that can be accommodated in a peak period, when the greatest amount of demand is placed on the airport system in a defined period of time, typically an hour or a day.

The profile of demand over the day—the level of "peakiness" in the schedule—and the seasonality of demand determine how frequently peak period capacity can be utilised in a year. Market factors, such as purpose of travel, airline business model, time zones at destinations, whether airlines are based at the airport, and the volume of transfer activity, establish seasonality and the daily profile of demand. These elements are combined to create a peak period ratio, which is applied to the peak period capacity to determine annual capacity (the total volume of passengers that can be accommodated in a year). The IATA ADRM provides methodologies for identifying the appropriate peak period and corresponding peak period ratios and these are used in this report.

Historical Dublin Airport operational data through December 31, 2025, has been evaluated to establish the unique demand profile of the airport and how this has changed over time. The capacity assessment detailed in this report is based on the demand profile through 2025, representing the current capacity of the airport in the context of the most recent available actual demand profile data.

Airline and Airport User Characteristics

Airport capacity is delivered by a set of functional areas that accommodate a diverse range of airline and airport users. Individual airlines have distinct operational characteristics, which has important implications for capacity. For example, available narrow-body aircraft stands cannot serve the needs of long-haul widebody aircraft operators. Similarly, airbridge-equipped stands in pier facilities that serve a complex mix of operations cannot provide capacity for the fast-turnaround, walkout boarding process required by some low-cost operators. Consequently, balanced capacity must be provided across the sequential steps of individual airport processes and across the parallel needs of distinct airport users.

Section 2 provides an overview of the methodologies used in the capacity assessment and **Section 3** discusses the demand characteristics that are important considerations in establishing capacity utilisation. **Section 4** provides a summary of the capacity assessment for each major function in the airport system and the resulting conclusions on total existing and future capacity.

Additional detail and technical information on the capacity assessment and applied methodologies are provided in **Appendices A** and **B**.

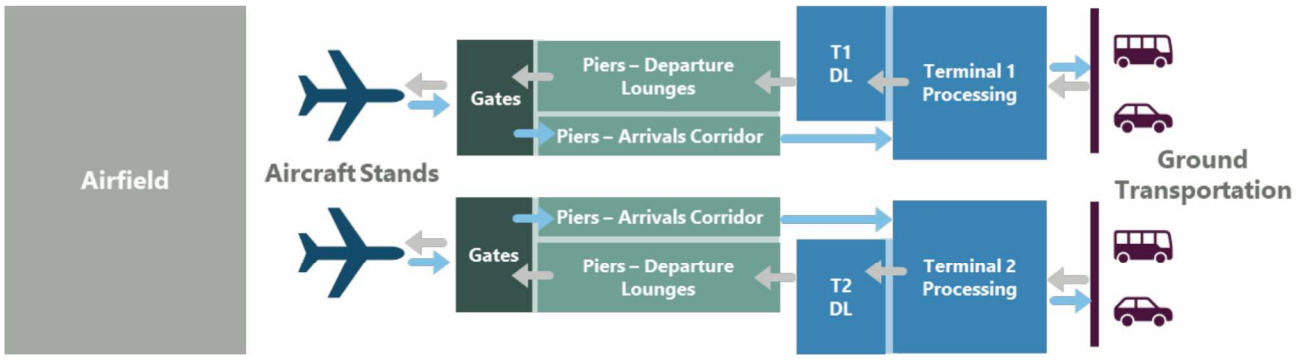
2. CAPACITY METHODOLOGY OVERVIEW

The existing facilities and infrastructure at Dublin Airport provide capacity to accommodate the volume, profile, and characteristics of demand as described in Section 2. Demand is handled at the airport through a series of sequential steps for arriving and departing passengers. The major functional components of the airport are illustrated in **Exhibit 2.1** and include:

- On-airport ground transportation facilities and infrastructure.
- Terminal passenger and baggage processing facilities.
- Terminal and pier departure lounge facilities.
- Gates and aircraft stands.
- Airfield.

Each of the five functional areas are described in this section along with the corresponding operational factors that establish capacity.

EXHIBIT 2.1: MAJOR FUNCTIONAL AREAS



SOURCE: Ricondo, **June 2026**.
NOTE: DL = Departure Lounge

2.1 BALANCED CAPACITY

Airports are an ecosystem of interconnected infrastructure, facilities, and operational processes – supporting a diverse range of passengers, supply chains, operators, businesses, and other users of aviation services. As demand grows, capacity must be balanced across functional components. Balanced capacity represents the ability of the total airport system to:

- Accommodate demand across each stage in each operational process.
- Accommodate the diverse needs of each distinct user of the airport system.

For example, provision of new widebody bridge-served aircraft stands provides capacity for long-haul, full-service aircraft operators. The same stands do not provide equivalent capacity for short-haul, low-cost airlines operating narrowbody aircraft from walkout gates. Demand growth is delivered by all airlines operating at an airport and the distinct capacity needs of each airline operator must be addressed to accommodate demand that is growing in parallel.

2.2 KEY CONSIDERATIONS FOR CAPACITY ASSESSMENT

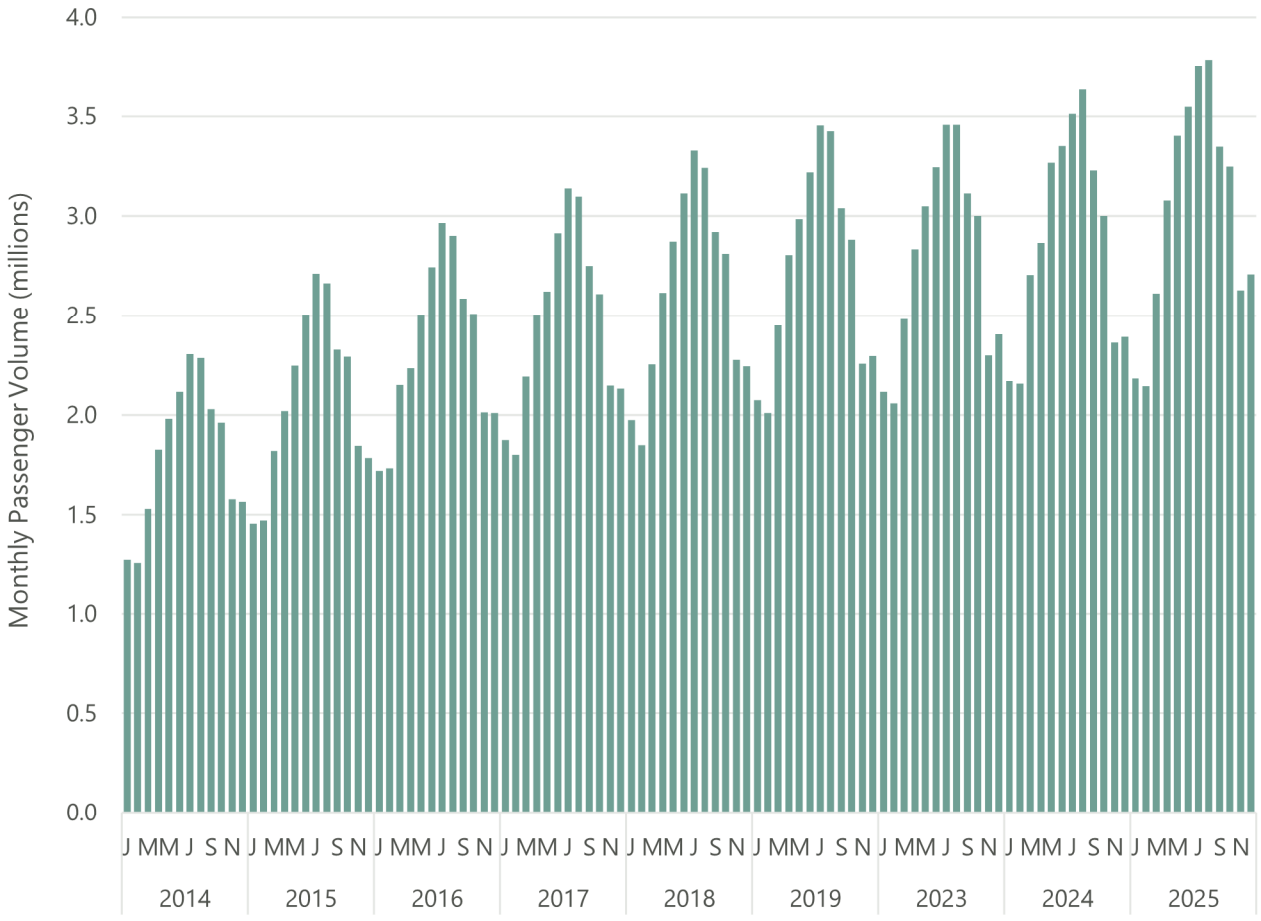
The capacity assessment for commercial passenger operations at Dublin Airport utilises standard methodologies published by the International Air Transport Association (IATA) in the Airport Development Reference Manual (ADRM), Edition 12. Key considerations for evaluating capacity include the following.

2.2.1 DEMAND PROFILE AND PEAKING CHARACTERISTICS

The characteristics of demand and the relationship between annual and peak periods are important considerations in establishing capacity. Demand is dynamic and the relationship between peak periods and total annual demand generally changes with demand growth.

The relationship between peak-hour capacity and annual capacity is determined by the profile of demand at an airport. The profile is established by the seasonality of passenger volumes and the flight schedule on a peak day. **Exhibit 2.2** charts demand seasonality at Dublin Airport over the 5-year period from 2014 to 2025, excluding 2020 to 2022 and **Exhibit 2.3** illustrates a typical Dublin Airport pattern of rolling hour scheduled departing passenger volumes.[1]

EXHIBIT 2.2: DUBLIN AIRPORT SEASONALITY – MONTHLY PASSENGER VOLUMES 2014-2019



SOURCE: Ricondo, **June 2026**, analysis of Dublin Airport operations data.

[1] Data from 2020 to 2022 has been excluded due to demand disruptions and operational mitigations resulting from the global Covid-19 pandemic.

EXHIBIT 2.3: INDICATIVE DEPARTURES FLIGHT SCHEDULE



SOURCE: Ricondo, **June 2026**.

Collectively, seasonality and the flight schedule establish how much of the theoretical 24 hours a day, 365 days a year capacity has practical utility for accommodating demand. The relationship between the annual passenger volume and the peak hour is referred to as the peak hour ratio. This ratio is used to convert peak hour capacity to a corresponding annual capacity level.

The process to choose the peak hour is defined in the IATA ADRM 12th Edition. This explains how the peak hour figure should not represent the absolute peak traffic volume in a year, but rather a volume that is representative of busy periods rarely exceeded throughout the year. The approach outlined in section 2.2.10.1.2 a) of the IATA ADRM 12th Edition is used to select the peak hour. The approach determined that the 30th highest hour of passenger flow experienced in the year is used as the peak hour.

The 30th busiest hour is determined by finding the peak rolling hour scheduled traffic for each of the Terminal 1 and Terminal 2 Arrivals and Departures flows in 5-minute increments for each day in the historical record between 2014-2019 and 2023-2025. The 30th busiest hour is identified for each individual flow.

The peak hour is divided by the total annual passenger volume for the corresponding flow to produce the peak hour ratio.

See **Section 3** for further detail on Dublin Airport demand characteristics.

2.2.2 PASSENGER PRESENTATION PROFILES

The timing of passenger show-up at airport processes before or after a flight and the distribution of demand volumes utilising parallel processing functions affects the capacity of airport processes.

For example, a high proportion of passengers travelling on long-haul flights typically check bags and tend to show up well in advance of their flight to allow enough time for the check-in process. As a result, the flow of passengers to check-in for a long-haul flight tends to be spread over a long period. In contrast, passengers travelling short haul tend to check fewer bags, and arrive at the airport closer to the time of departure for their

flight, creating a shorter, peakier demand at check-in and at security due to a higher percentage of passengers not checking bags.

Individual functional areas provide capacity to process passengers as they arrive at the function. The relationship between peak passenger presentation volumes and the peak volume of passengers onboard aircraft at scheduled flight arrival or departure time is important for correctly expressing capacity at a peak period or annual level.

Presentation profiles are also influenced by operational characteristics such as airline checked baggage policies and technology enablement along the passenger journey, impacting the timing and distribution of passenger flows through processing facilities.

Exhibit 2.4 provides an example presentation profile for passengers at security over the course of a typical day. The chart compares rolling hour passenger volumes presenting at security screening relative to rolling hour passenger volumes at scheduled flight departure times. This illustrates that peak demand at security screening is lower than peak demand at scheduled flight departure times.

Exhibit 2.5 provides an example of the diverse range of flow distributions through a typical departures process, driven by different airline business processes and operating characteristics. In the example, 90% of passengers flying with the long-haul, full-service operator proceed to check-in and 30% utilise the agent check-in process. In contrast, 27% of passengers flying with the short-haul, low-cost operator proceed to check-in, with 5% utilising the agent check-in service.

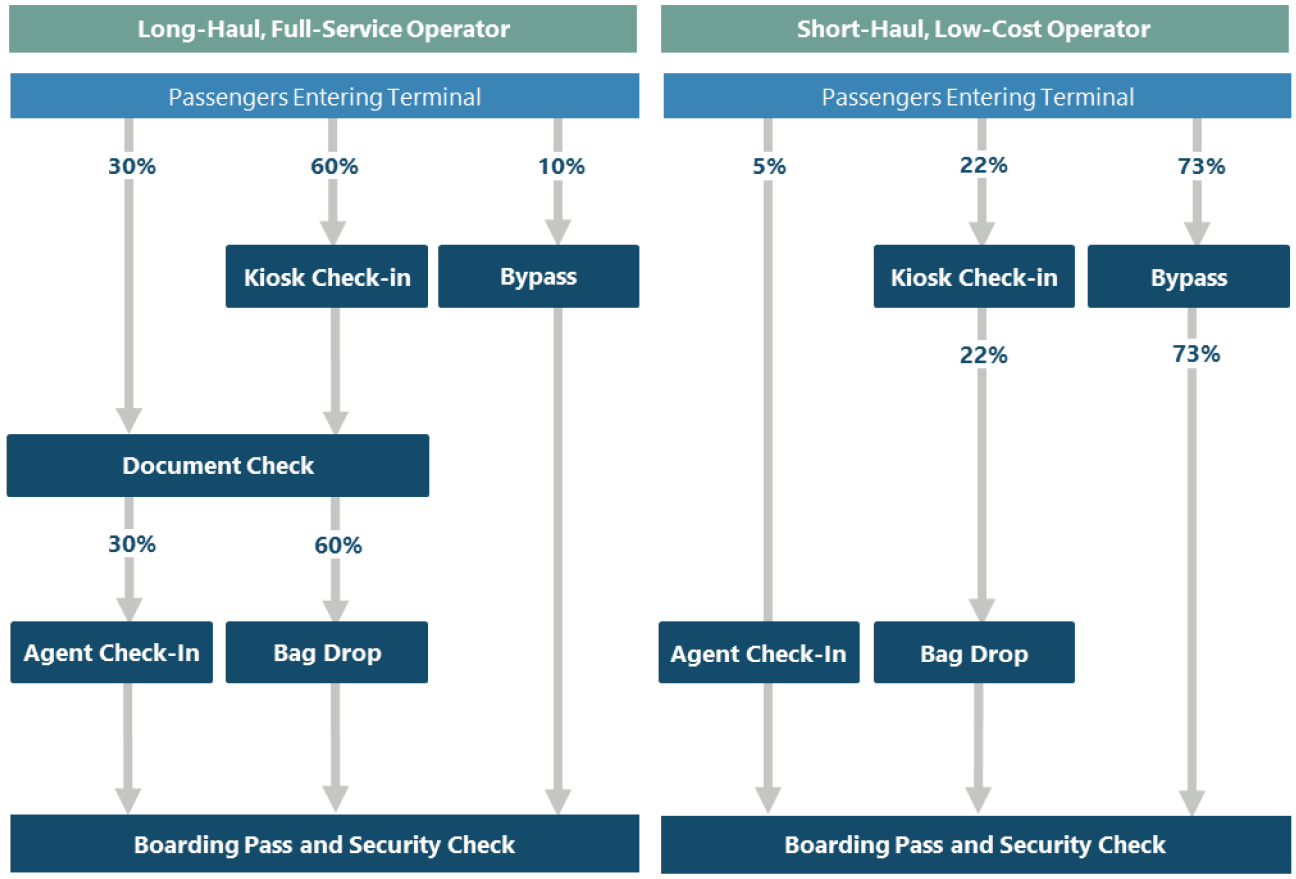
Presentation profiles, representing the volume of passengers presenting at individual processing functions, are established by a combination of the show-up profiles and the flow distribution percentages.

EXHIBIT 2.4: INDICATIVE DEPARTING PASSENGER SHOW-UP PROFILE



SOURCE: Ricondo, **June 2026**.

EXHIBIT 2.5: INDICATIVE DEPARTURE PROCESSING DEMAND DISTRIBUTION



SOURCE: Ricondo, **June 2026**.

Section 3, Capacity Assessment Summary, provides presentation profiles for each processing function, expressing the peak presentation volume at each processor as a percentage of the peak passenger volume at scheduled flight time. Each of the four processing flows (Terminal 1 Departures, Terminal 1 Arrivals, Terminal 2 Departures, and Terminal 2 Arrivals) include an exhibit illustrating the processing facilities and flows. The presentation volume for each flow is also presented in the exhibits as a percentage of peak scheduled flight time volume.

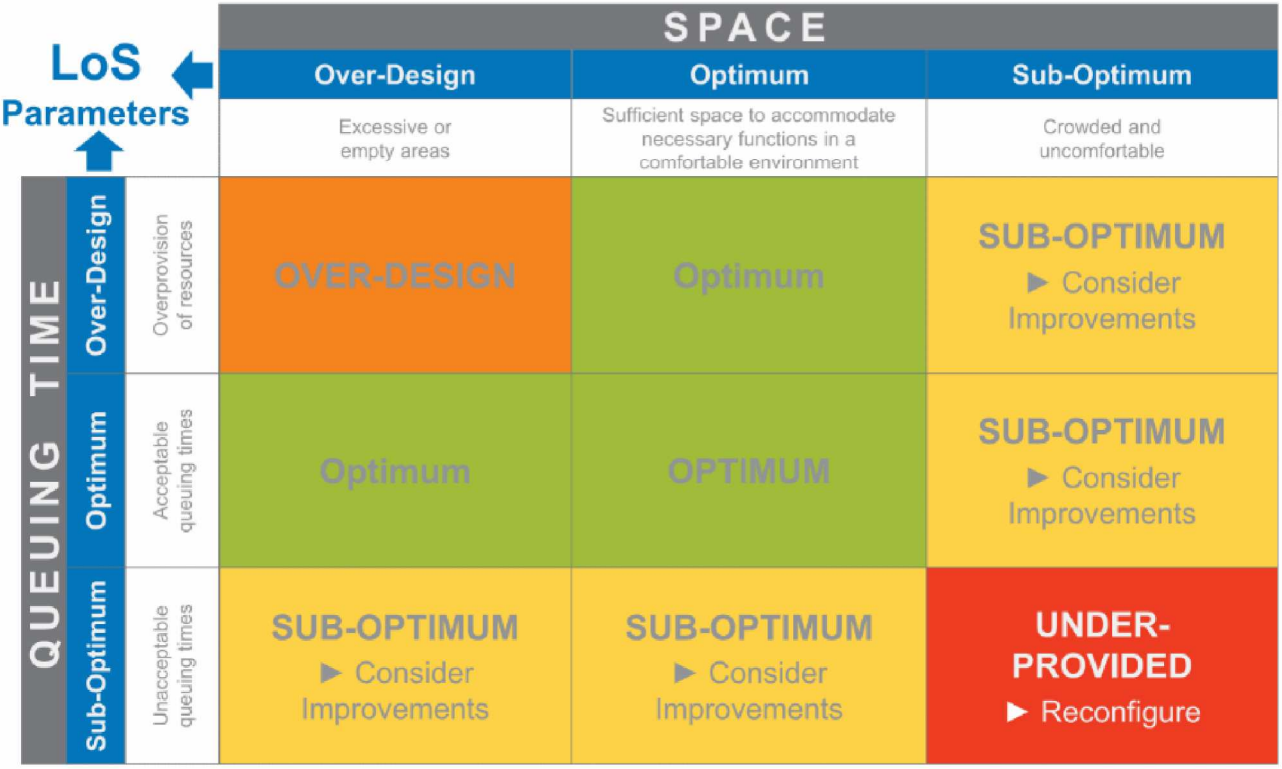
Peak hour capacity is calculated for each processing function, representing the volume of passengers that can be physically handled at the facility in a peak period. The presentation profile percentages are applied to the peak processor capacity to express the peak hour capacity in terms of scheduled flight time.

As an example, a processing facility with a capacity of 1,000 passengers and a presentation profile volume of 50% of the scheduled flight time volume, would have an equivalent capacity at scheduled flight time of 2,000 passengers.

2.2.3 LEVEL-OF-SERVICE (LOS) STANDARDS

The IATA ADRM provides guidance for setting Level-of-Service (LOS) standards, considering waiting times and space occupancy, as illustrated in **Exhibit 2.6**. daa utilises optimum LOS targets in assessing operational performance and planning for capacity requirements. Optimum levels have been utilised to establish the capacity levels summarised in Section 3, Capacity Assessment Summary.

EXHIBIT 2.6: IATA ADRM LEVEL-OF-SERVICE MATRIX



SOURCE: IATA ADRM Edition 12

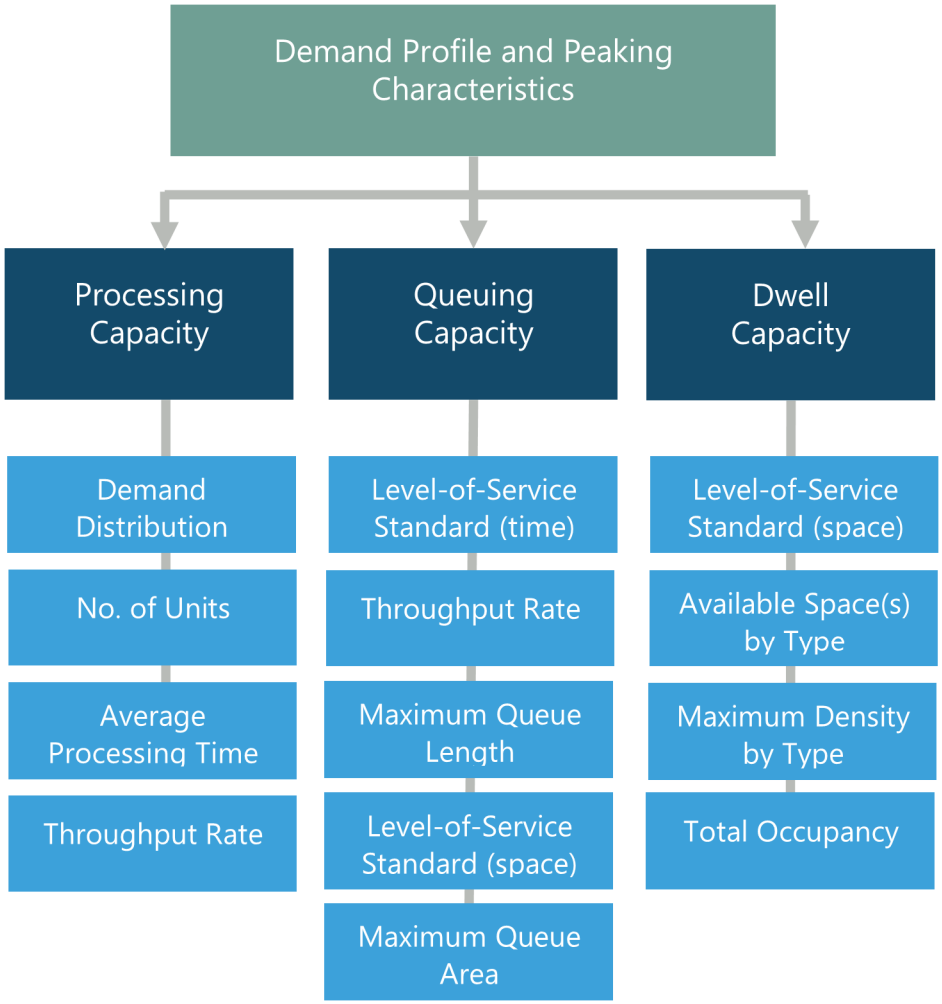
2.2.4 CAPACITY APPROACH BY FUNCTIONAL AREA TYPE

The three primary categories of functional area within airport systems include:

- **Processing**: active processes such as check-in, security, or immigration.
- **Queuing**: space to accommodate passengers waiting for processing functions.
- **Dwell**: space available to accommodate passengers, aircraft, or vehicles. For example, passengers typically dwell in the departures lounge and gate lounge areas prior to boarding; aircraft are accommodated on parking stands during the aircraft turnaround from an arriving operation to a departing operation.

Exhibit 2.7 illustrates the key considerations for assessing capacity in each of the three functional types. These considerations, and the IATA ADRM methodologies applied, are summarised in Section 3, Capacity Assessment Summary and discussed in more detail in the technical analysis detailed in **Appendices B** and **C.** for each functional component of the existing facilities and infrastructure at Dublin Airport.

EXHIBIT 2.7: CAPACITY ASSESSMENT CONSIDERATIONS BY FUNCTIONAL TYPE



SOURCE: Ricondo, **June 2026**.

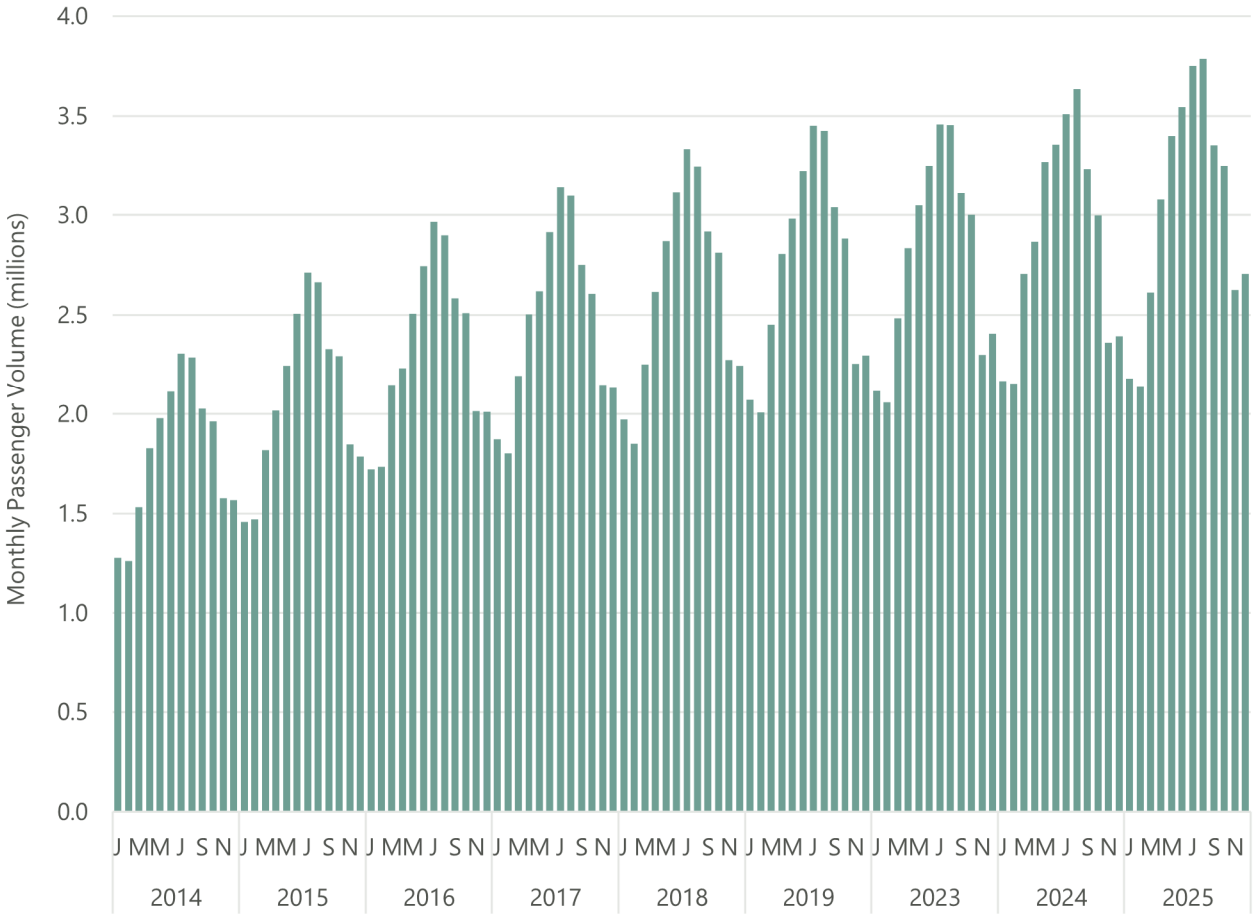
3. DEMAND PROFILE

The relationship between peak-hour capacity and annual capacity is determined by the profile of demand at an airport. The profile is established by the seasonality of passenger volumes and the schedule on a peak day. **Exhibit 3.1** illustrates demand seasonality at Dublin Airport over the 9-year period from 2011 to 2019. **Exhibit 3.2** illustrates a typical Dublin Airport pattern of rolling hour scheduled departing passenger volumes.

Airport capacity is determined by establishing the volume of demand that can be accommodated during a peak period, generally the peak hour in a busy day for most functions. When peak period demand reaches peak period capacity, the ability of the airport to accommodate demand becomes constrained – further peak period growth cannot be accommodated. Growth outside the peak periods can be accommodated, however, similar to roadway traffic, a high proportion of demand occurs during peak seasons, busy days, and peak hours – the equivalent of rush hour during a weekday on a roadway. When no further demand can be accommodated in peak periods or the rush hour, an airport or roadway is effectively operating at capacity.

The demand profile represents the pattern of unconstrained demand across a year, peak months, busy days, and peak hours, establishing how much of the theoretical 24 hours a day, 365 days a year that capacity will be utilised by airlines and passengers, and how much will not. The demand profile is used to represent airport capacity in terms of total annual passenger volume – taking into account capacity availability when there is demand for air service and not including periods when demand does not exist.

EXHIBIT 3.1: DUBLIN AIRPORT DEMAND SEASONALITY – MONTHLY PASSENGERS 2014-2019



SOURCE: Ricondo, **June 2026**, analysis of Dublin Airport operations data.

EXHIBIT 3.2: INDICATIVE DEPARTURES FLIGHT SCHEDULE



SOURCE: Ricondo, **June 2026**.

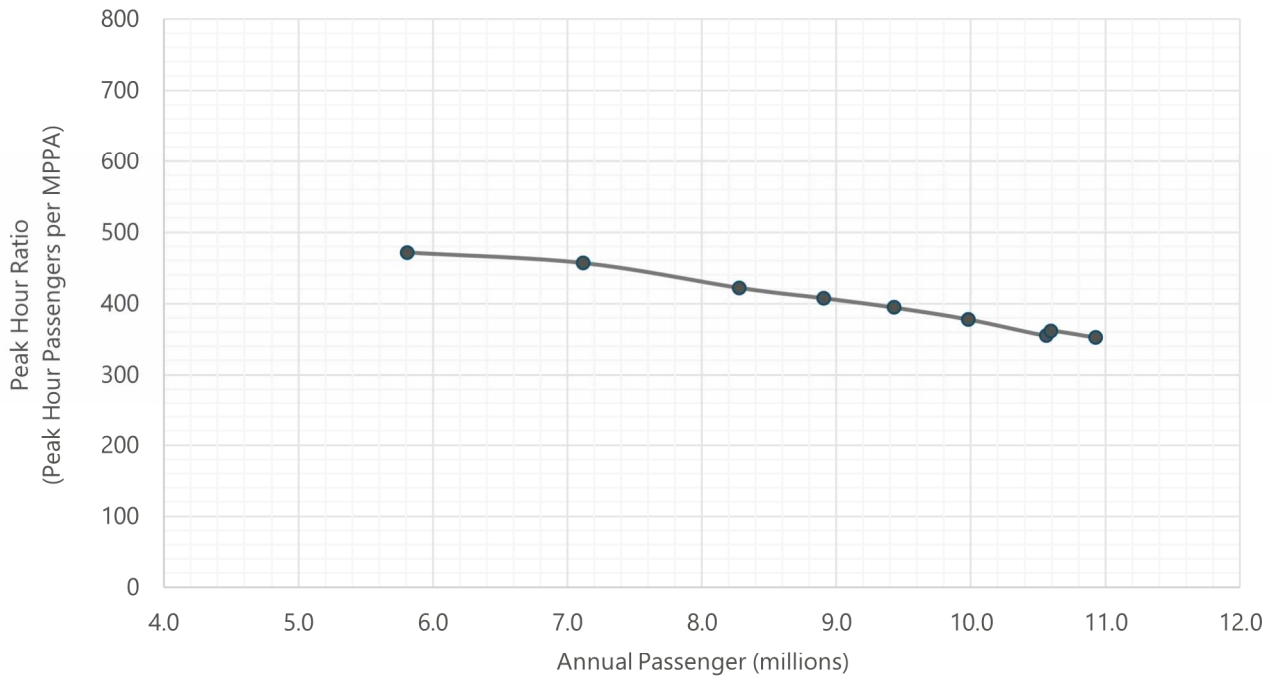
The relationship between the annual passenger volume and the peak hour is referred to in this report as the peak hour ratio. The ratios are used to convert peak hour capacity to a corresponding annual demand level that can be accommodated by the airport.

The process to identify peak hours that represent busy periods rarely exceeded throughout the year is defined in the IATA ADRM 12th Edition. The approach outlined in Section 2.2.10.1.2 a) of the IATA ADRM was applied to select representative peak hours for each functional component evaluated. The methodology selects the 30th busiest hour experienced in a year as the peak hour. This is determined based on finding the peak rolling hour passenger volumes for the Terminal 1 and Terminal 2 Arrivals and Departures flows in 5-minute increments for each day in the historical operations records between 2014 to 2025, excluding the pandemic years of 2020 to 2022, and ranking those for each year and selecting the 30th busiest hour for each year. The corresponding peak hour ratio for each year is determined by dividing the peak hour volume by the annual volume.

Peak period demand ratios represent the peak period demand per one million passengers per annum (MPPA) for each demand segment. For example, if a peak period demand ratio for a particular passenger processing function is 500 peak hour passengers per one million annual passengers and the corresponding peak hour capacity for the function is 1,000 passengers, the annual capacity for the function would be two million passengers (1000 ÷ 500 = 2 MPPA)

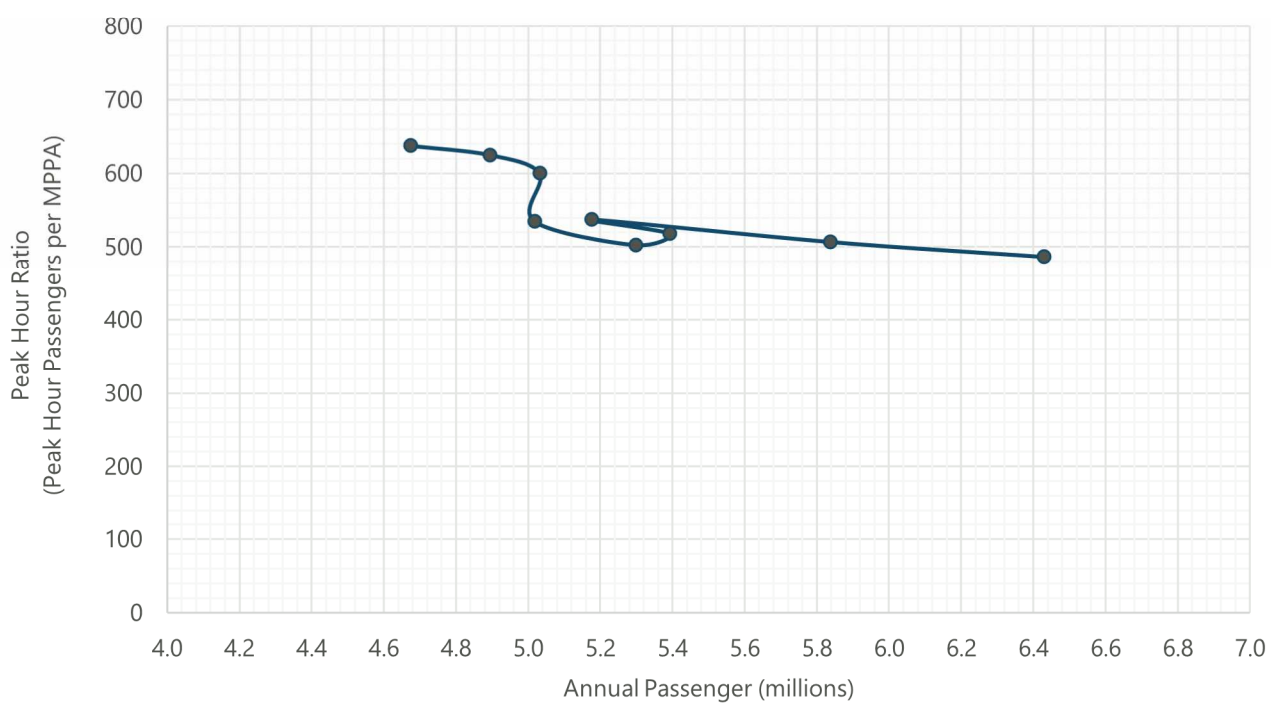
Exhibits 3.3 to 3.6 detail the resulting peak hour passengers per MPPA ratio for each of the nine years. **Exhibit 3.7** presents the peak day ratio, the 30th busy day for airport-wide departing passengers divided by the total annual airport-wide departing passengers per year. **Exhibit 3.8** presents the average aircraft seat size per movement and the average passenger load per movement in each year. **Exhibit 3.9** presents the busy day average load factor per year.

EXHIBIT 3.3: TERMINAL 1 ORIGINATING – HISTORICAL PEAK HOUR TO ANNUAL PASSENGER RATIO



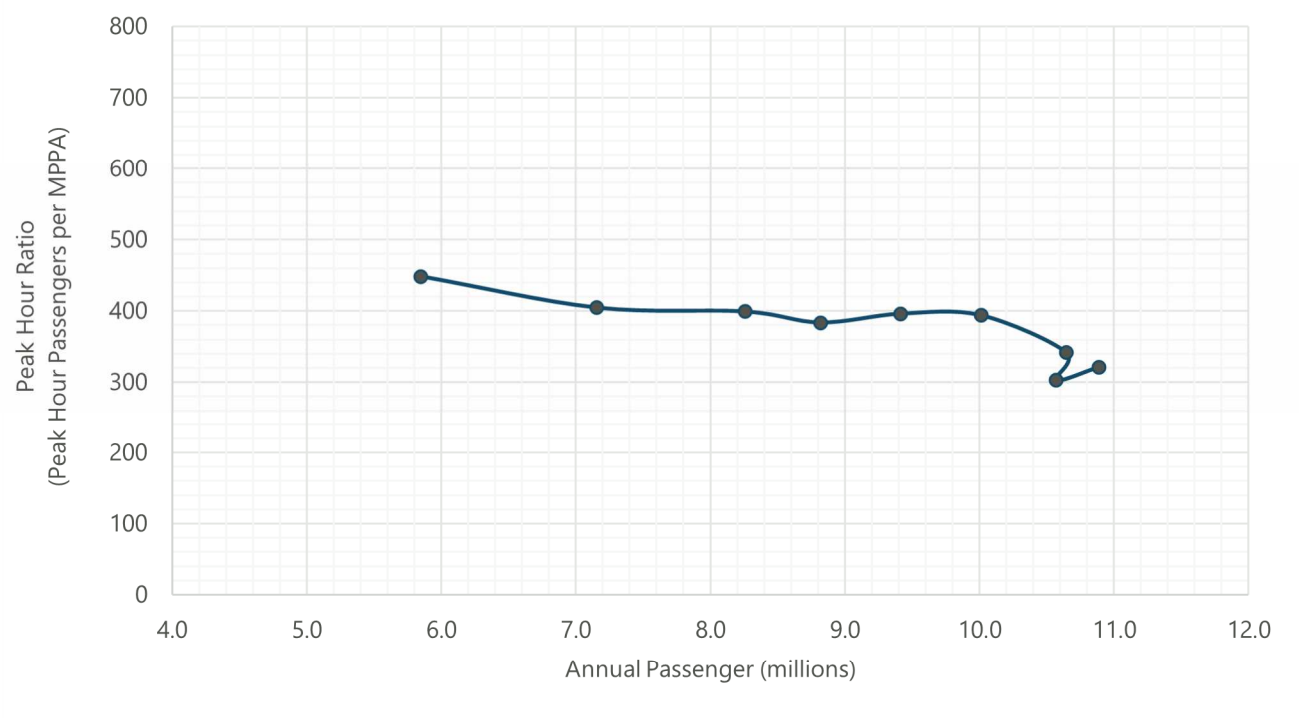
SOURCE: Ricondo, **June 2026**, analysis of Dublin Airport operations data. Exhibit A-3: Terminal 2 Originating – Historical Peak Hour to Annual Passenger Ratio

EXHIBIT 3.4: TERMINAL 2 ORIGINATING – HISTORICAL PEAK HOUR TO ANNUAL PASSENGER RATIO



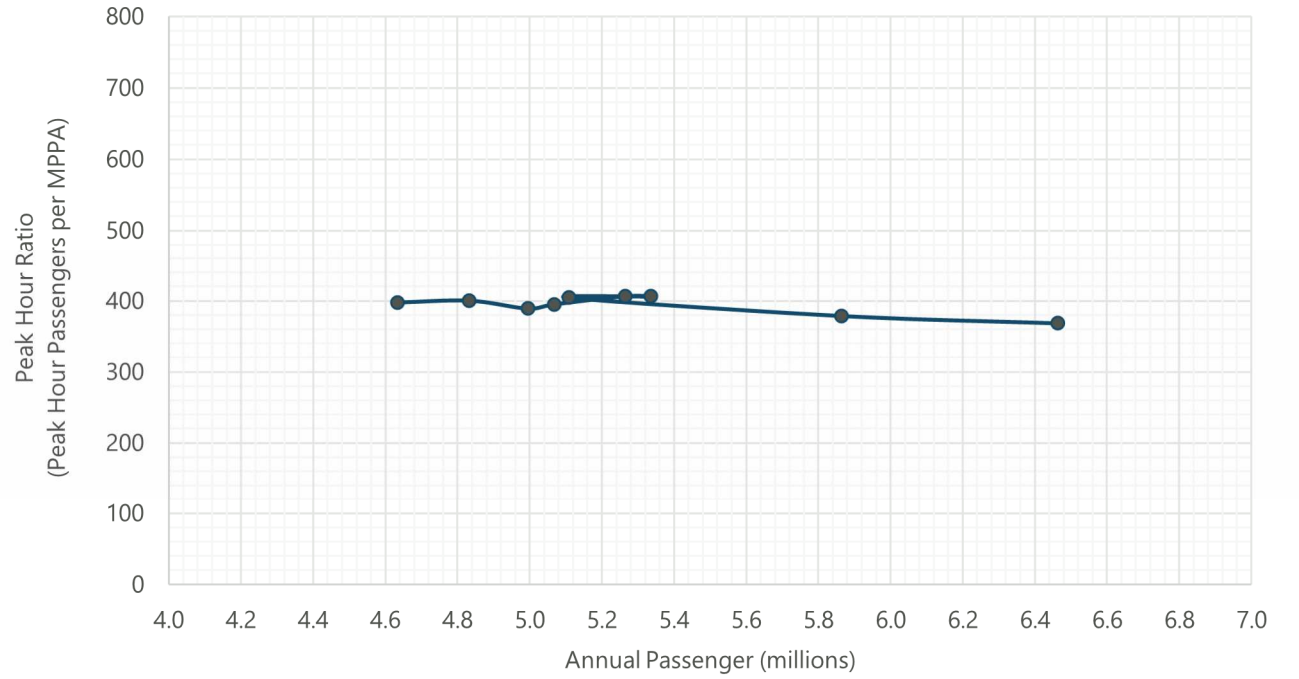
SOURCE: Ricondo, **June 2026**, analysis of Dublin Airport operations data.

EXHIBIT 3.5: TERMINAL 1 TERMINATING – HISTORICAL PEAK HOUR TO ANNUAL PASSENGER RATIO



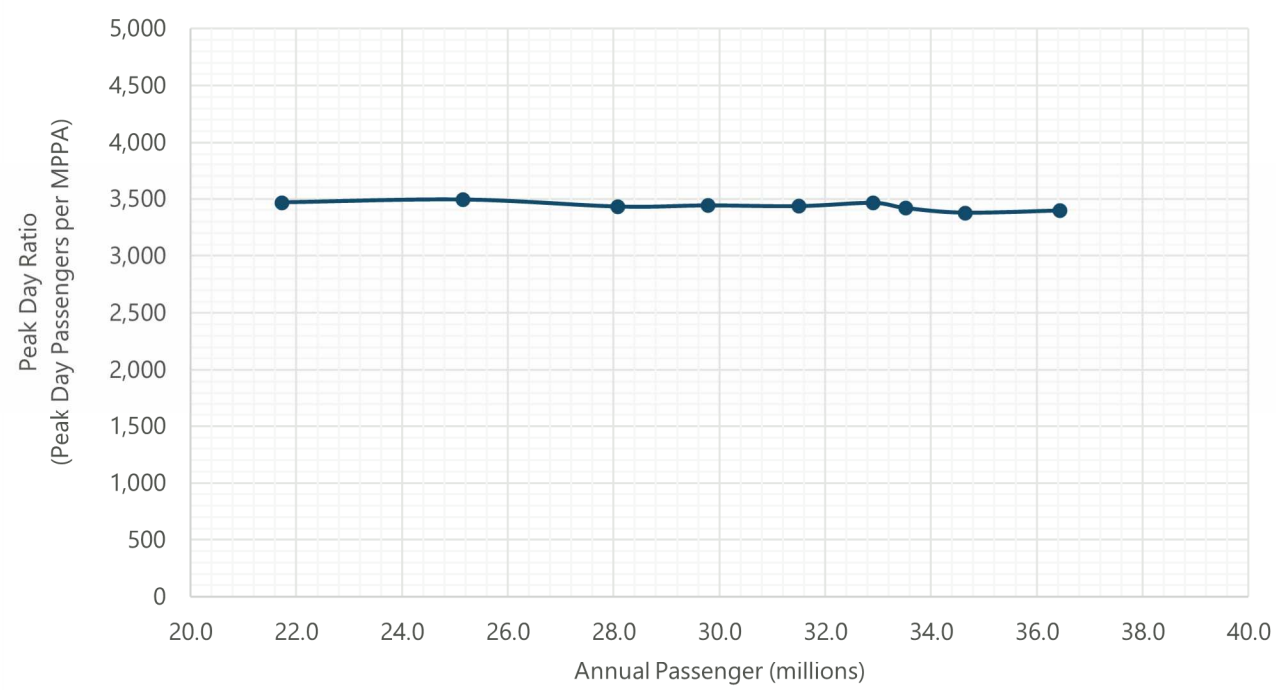
SOURCE: Ricondo, **June 2026**, analysis of Dublin Airport historical operations data.

EXHIBIT 3.6: TERMINAL 2 TERMINATING – HISTORICAL PEAK HOUR TO ANNUAL PASSENGER RATIO



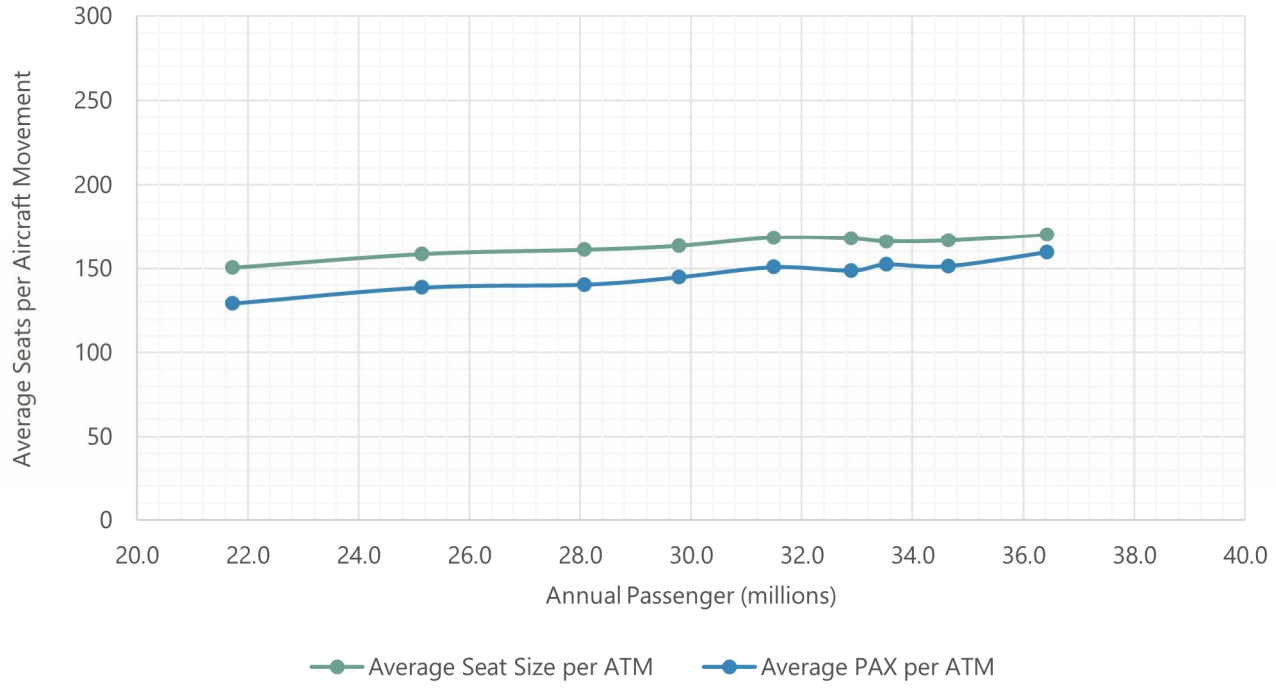
SOURCE: Ricondo, **June 2026**, analysis of Dublin Airport historical operations data.

EXHIBIT 3.7: AIRPORT-WIDE PEAK DAY – HISTORICAL PEAK DAY TO ANNUAL PASSENGER RATIO



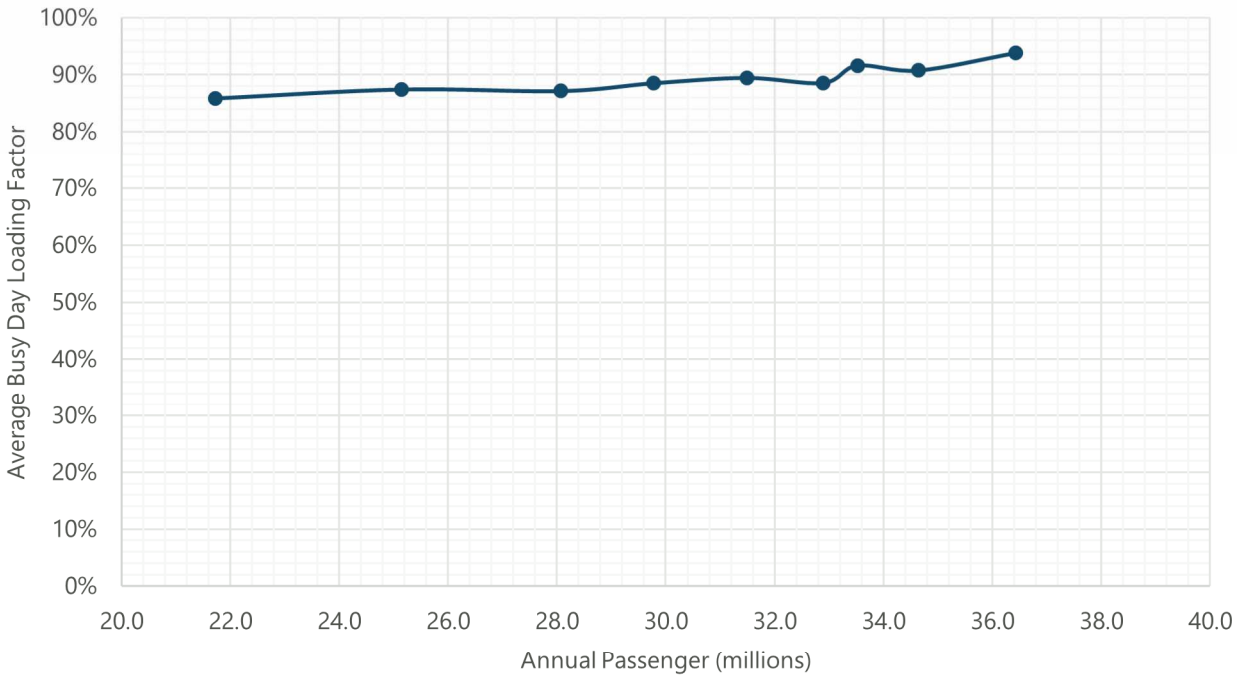
SOURCE: Ricondo, **June 2026**, analysis of Dublin Airport historical operations data.

EXHIBIT 3.8: AVERAGE AIRCRAFT SEAT SIZE AND AVERAGE PASSENGERS PER MOVEMENT



SOURCE: Ricondo, **June 2026**, analysis of Dublin Airport historical operations data.

EXHIBIT 3.9: BUSY DAY AVERAGE LOAD FACTOR



SOURCE: Ricondo, **June 2026**, analysis of Dublin Airport historical operations data.

TABLE 3.1: SELECTED PEAK-HOUR RATIOS AND METRICS

TERMINAL AND FLOW	CURRENT PEAK-HOUR RATIO
Terminal 1 Originating Departures	355
Terminal 1 Terminating Arrivals	320
Terminal 2 Originating Departures	510
Terminal 2 Terminating Arrivals	375
Terminal 2 Transfers Departure	955
Peak Day Airport-Wide Departing Passengers	3,400
Average Seats per Aircraft Movement	170
Average Passengers per Aircraft Movement	160

SOURCE: Ricondo, **June 2026**, analysis of Dublin Airport historical operations data.

4. CAPACITY ASSESSMENT SUMMARY

The capacity assessment was completed for existing Dublin Airport facilities, infrastructure, equipment, and operational parameters and the results are summarised for the major functional components in the following sections. Section 3 provides detailed information on the profile and characteristics of demand applied in the capacity analyses and **Appendices A** and **B** provide additional information on the methodologies and technical analyses completed in support of the capacity assessment.

4.1 AIRPORT LANDSIDE

On-airport landside facilities and infrastructure providing capacity to accommodate public, private and commercial ground transportation services will be assessed in the Environmental Impact Assessment Report (EIAR) Chapter 6 and associated appendices.

The EIAR evaluates the surface access system at a future demand level of 40 MPPA, the current findings indicate that the infrastructure will perform adequately. Following discussions with AECOM, the EIAR Chapter 6 author, this report assumes there is sufficient flexibility across the ground transportation services offered at the airport for the system to adjust to accommodate a demand level of 40.5 MPPA.

4.2 PASSENGER TERMINALS

Passenger terminal capacity is presented by terminal, flow direction, and major functional area in the following sections. The capacity of each function is presented in the following two forms:

- **At-function capacity** – the capacity of each function to accommodate passenger volume presenting during a peak period.
- **At-flight time capacity** – the equivalent capacity at scheduled flight time that can be accommodated by the function.

The at-function and at-flight time capacities are connected through the **presentation profile percentage**, which represents the proportional relationship between the volume of passengers presenting at the function, based on pre-departure show-up time and where applicable, the parallel distribution of passengers between different processes.

A flow chart is provided for each section demonstrating the process flow, presentation volume percentages, and the results of the capacity assessment.

4.2.1 TERMINAL 1 DEPARTURES

The Terminal 1 originating departures process consists of check-in, boarding pass verification, and security screening functions.

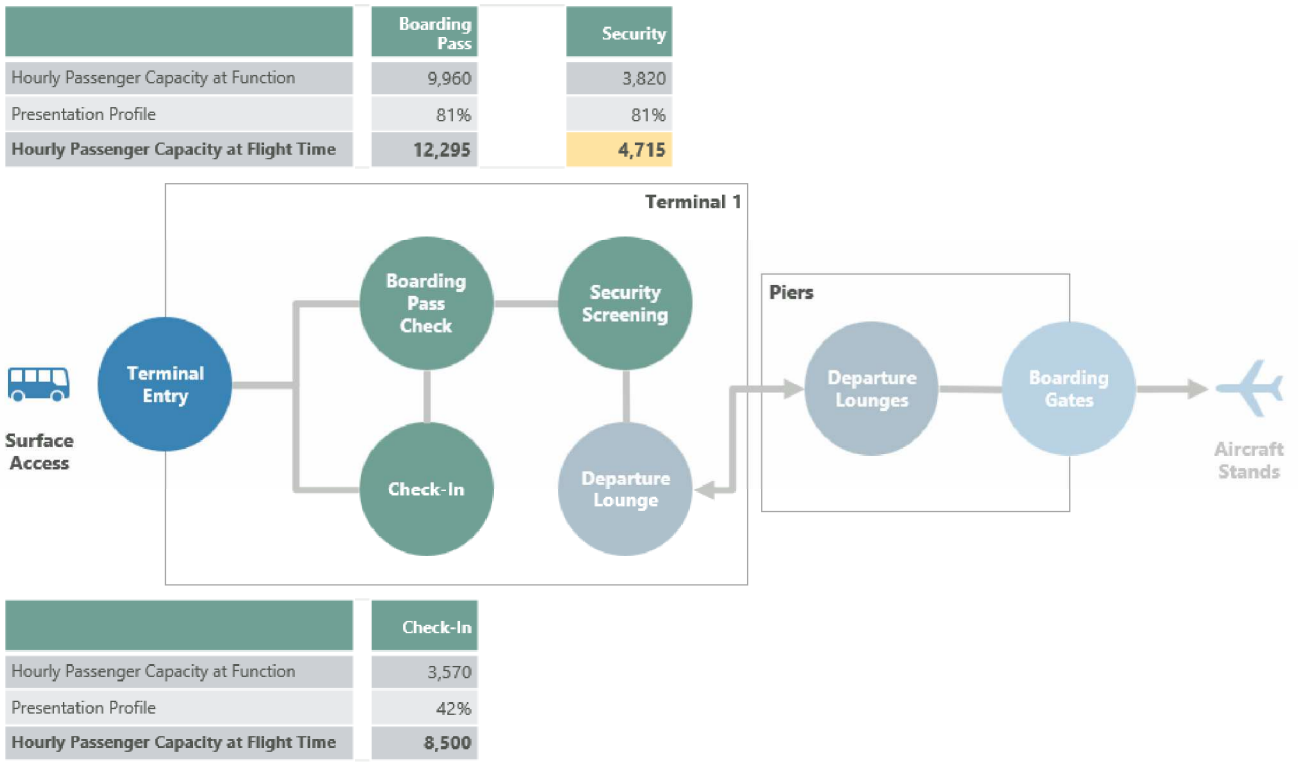
Peak hour capacity of each processing function is determined by an IATA ADRM methodology, which considers configuration, equipment, and operational characteristics. The corresponding peak hour capacity at scheduled flight departure time is determined by the proportional relationship represented by the passenger presentation profile. These factors are discussed in further detail in **Section 3**.

Exhibit 4.1 illustrates the Terminal 1 departures flow and the hourly passenger capacity of each individual processing function. The security screening function has the lowest capacity, limiting the **peak hour Terminal 1 originating departures volume at scheduled flight time to a maximum of 4,715 passengers**. The peak

hour passenger volume is converted to an annual passenger volume using the peak hour ratio. The ratio and corresponding annual capacity are detailed in **Section 4.5**.

See **Appendix A.1.1** for additional information on Terminal 1 Departures capacity.

EXHIBIT 4.1: TERMINAL 1 ORIGINATING DEPARTURES PROCESSING CAPACITY



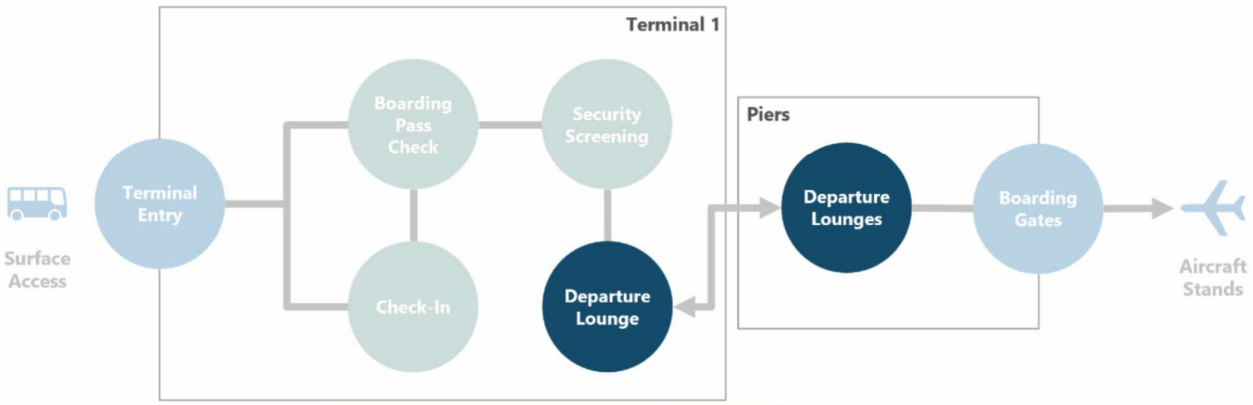
SOURCE: Ricondo, **June 2026**.

Departing passengers cleared through security screening proceed to departure lounge facilities located in Terminal 1 and Piers 1, 2 and 3. Departure lounges include a range of accommodations, services, and amenities, including seating areas, duty free and travel retail shops, and food and beverage locations. Passengers can move freely between the terminal and pier departure lounge areas, and the combined space accommodates the total volume of post-security passengers dwelling prior to aircraft boarding.

Peak hour departure lounge capacity is determined by maximum occupancy densities for each category of space within the terminal and pier departure lounge areas. For example, duty free shops accommodate fewer passengers per square metre than gate lounge seating areas. The corresponding peak hour capacity at scheduled flight departure time is determined by the proportional relationship represented by the passenger presentation profile. These factors are discussed in further detail in **Section 3**.

Exhibit 4.2 illustrates the departures lounge functions in the context of the overall departures flow and provides the combined passenger dwell capacity for Terminal 1 and Piers 1, 2 and 3. The **departures lounge facilities can accommodate a peak hour departures volume at scheduled flight time of a maximum of 6,320 passengers**. The peak hour passenger volume is converted to an annual passenger volume using the peak hour ratio. The ratio and corresponding annual capacity are detailed in **Section 4.5**.

EXHIBIT 4.2: TERMINAL 1 DEPARTURES – TERMINAL AND PIER DEPARTURE LOUNGE CAPACITY



	Departure Lounges
Hourly Passenger Capacity at Function	6,255
Presentation Profile	99%
Hourly Passenger Capacity at Flight Time	**6,320**

SOURCE: Ricondo, **June 2026**.

4.2.2 TERMINAL 1 BAGGAGE HANDLING SYSTEM

The Terminal 1 and Terminal 2 outbound baggage handling systems were upgraded several years ago to comply with ECAC EDS Standard 3 screening requirements. The improvements included load sharing between devices, additional resilience through new baggage links between systems, and the ability to transfer bags between Terminal 1 and Terminal 2. The upgrades allow the outbound baggage systems to provide sufficient handling capacity to accommodate the induction capacity of the check-in systems under current operating procedures and assumptions. The capacity analysis assumes the outbound system matches the Terminal 1 check-in capacity summarised in **Section 4.2.1**.

4.2.3 TERMINAL 1 ARRIVALS

The Terminal 1 terminating arrivals process consists of immigration screening, baggage reclaim, customs screening, and the arrivals hall.

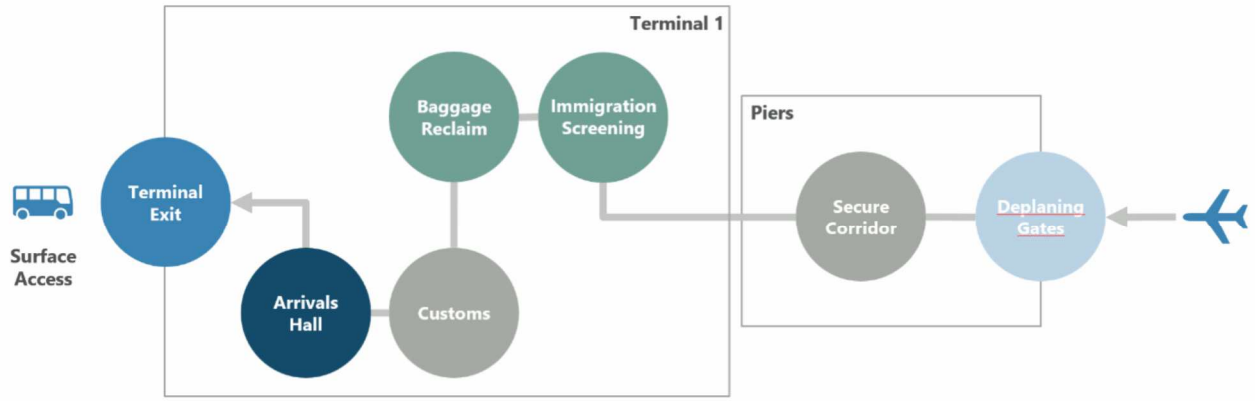
Peak hour capacity of each function is determined by an IATA ADRM methodology, which considers configuration, equipment, and operational characteristics. The corresponding peak hour capacity at scheduled flight departure time is determined by the proportional relationship represented by the passenger presentation profile. These factors are discussed in further detail in **Section 3**.

Exhibit 4.3 illustrates the Terminal 1 arrivals flow and the capacity of each individual function. Immigration screening has the lowest capacity, limiting the **peak hour Terminal 1 terminating arrivals volume at scheduled flight time to a maximum of 5,490 passengers**. The peak hour passenger volume is converted to an annual passenger volume using the peak hour ratio. The ratio and corresponding annual capacity are detailed in **Section 4.5**.

See **Appendix A.1.2** for additional information on Terminal 1 Arrivals capacity.

EXHIBIT 4.3: TERMINAL 1 TERMINATING ARRIVALS CAPACITY

	Baggage Reclaim	Immigration Screening
Hourly Passenger Capacity at Function	5,370	5,270
Presentation Profile	96%	96%
Hourly Passenger Capacity at Flight Time	**5,595**	**5,490**



Arrivals Hall	
6,350	Hourly Passenger Capacity at Function
96%	Presentation Profile
6,615	**Hourly Passenger Capacity at Flight Time**

SOURCE: Ricondo, **June 2026**.

4.2.4 TERMINAL 2 DEPARTURES

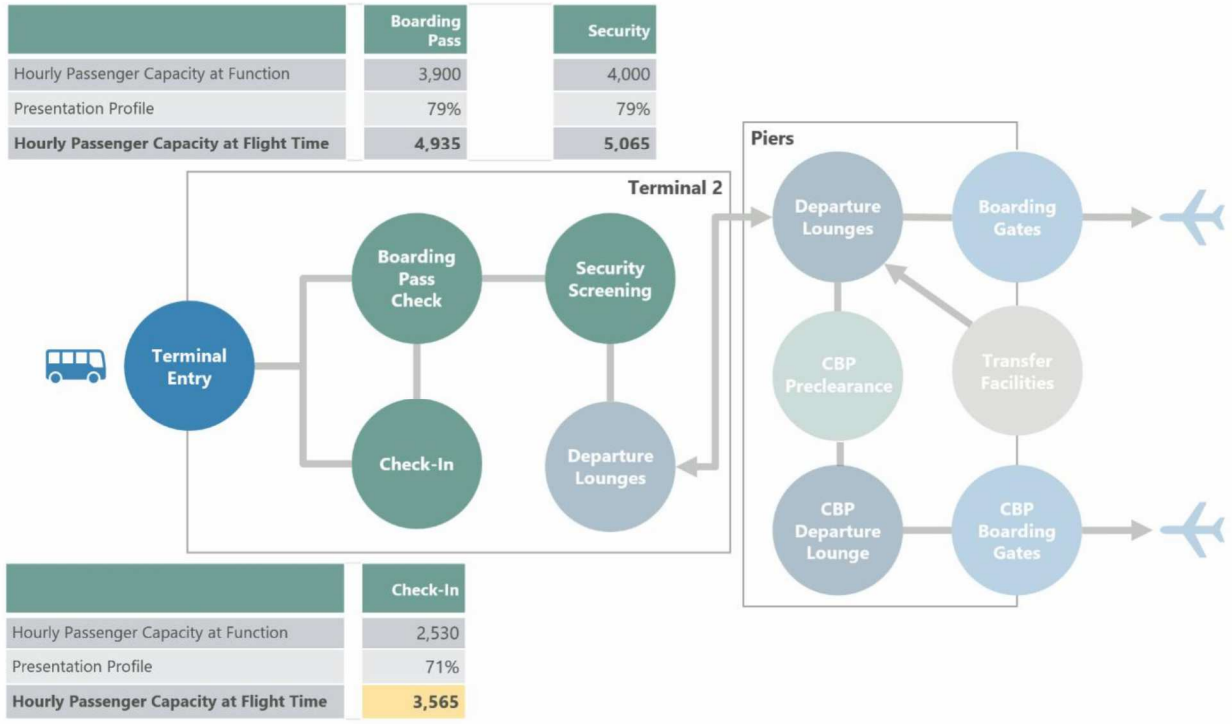
The Terminal 2 originating departures process consists of check-in, boarding pass verification, and security screening functions.

Peak hour capacity of each processing function is determined by an IATA ADRM methodology, which considers configuration, equipment, and operational characteristics. The corresponding peak hour capacity at scheduled flight departure time is determined by the proportional relationship represented by the passenger presentation profile. These factors are discussed in further detail in **Section 3**.

Exhibit 4.4 illustrates the Terminal 2 departures flow and the hourly passenger capacity of each individual processing function. The check-in function has the lowest capacity, limiting the **peak hour Terminal 2 originating departures volume at scheduled flight time to a maximum of 3,565 passengers**. The peak hour passenger volume is converted to an annual passenger volume using the peak hour ratio. The ratio and corresponding annual capacity are detailed in **Section 4.5**.

See **Appendix A.1.3** for additional information on Terminal 2 Departures capacity.

EXHIBIT 4.4: TERMINAL 2 ORIGINATING DEPARTURES PROCESSING CAPACITY



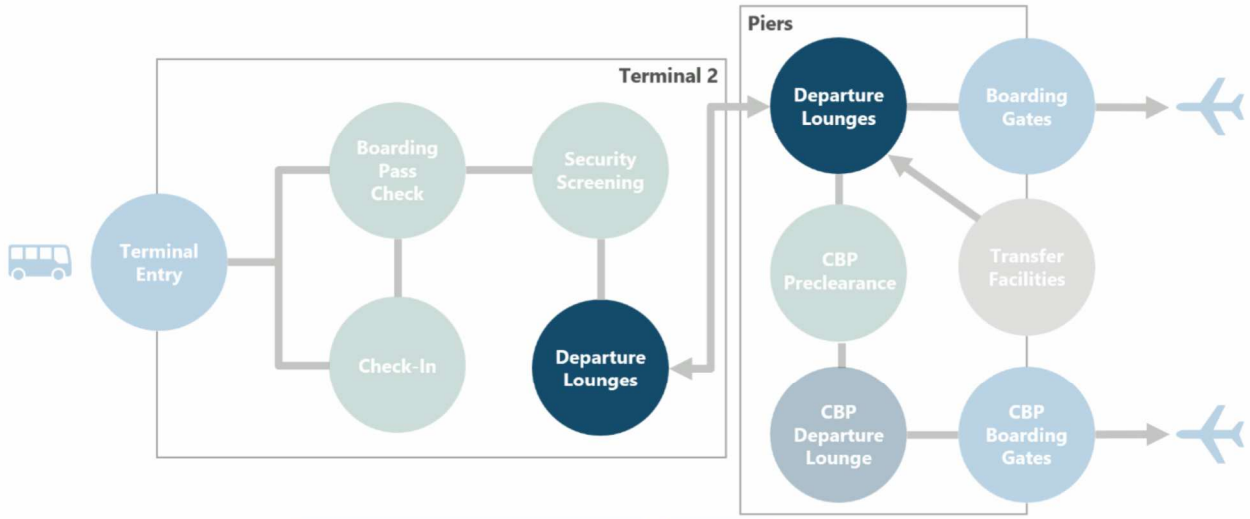
SOURCE: Ricondo, **June 2026**.

Departing passengers cleared through security screening proceed to departure lounge facilities located in Terminal 2 and Pier 4. Departure lounges include a range of services, and amenities, including seating areas, duty free and travel retail shops, and food and beverage locations. Passengers can move freely between the terminal and pier departure lounge areas, and the combined space accommodates the total volume of post-security passengers dwelling prior to aircraft boarding.

Peak hour departure lounge capacity is determined by maximum occupancy densities for each category of space within the terminal and pier departure lounge areas. For example, duty free shops accommodate fewer passengers per square metre than gate lounge seating areas. The corresponding peak hour capacity at scheduled flight departure time is determined by the proportional relationship represented by the passenger presentation profile. These factors are discussed in further detail in **Section 3**.

Exhibit 4.5 illustrates the departures lounge functions in the context of the overall departures flow and provides the combined passenger dwell capacity for Terminal 2 and Pier 4. The departures lounge facilities can accommodate a **peak hour departures volume at scheduled flight time of a maximum of 4,705 passengers**. The peak hour passenger volume is converted to an annual passenger volume using the peak hour ratio. The ratio and corresponding annual capacity are detailed in **Section 4.5**.

EXHIBIT 4.5: TERMINAL 2 DEPARTURES – TERMINAL AND PIER DEPARTURE LOUNGE CAPACITY



	Departure Lounges
Hourly Passenger Capacity at Function	4,940
Presentation Profile	105%
Hourly Passenger Capacity at Flight Time	**4,705**

SOURCE: Ricondo, **June 2026**.

4.2.5 TERMINAL 2 PRECLEARED DEPARTURES TO THE UNITED STATES

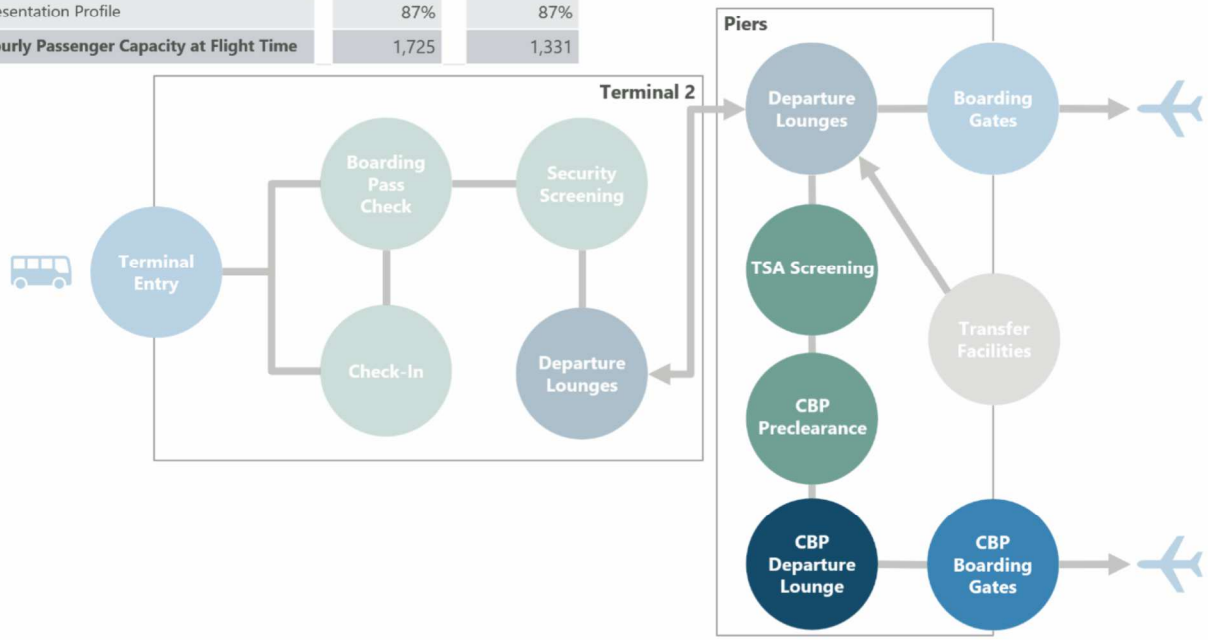
Passengers departing to the United States preclear U.S. CBP immigration before boarding in Dublin and arrive as domestic passengers at the destination airport. Passengers proceed from the Terminal 2 Departures Lounge to the CBP Preclearance facility in Pier 4. Following boarding pass and passport verification, transfer passengers advance to a security checkpoint, which provides supplementary screening in compliance with U.S. Transportation Security Administration (TSA) requirements, followed by customs and immigration screening with a CBP Officer. Non-transfer passengers head directly from the boarding pass and passport verification to customs and immigration screening. Precleared passengers then proceed to segregated departures lounge and gate holdroom facilities that are restricted to precleared US flights only. These holdroom facilities operate in a swing configuration that can be expanded or reduced in size to optimise the use of Pier 4.

Exhibit 4.6 illustrates the Terminal 2 U.S. CBP flow and the hourly passenger capacity of each individual processing function.

The preclearance function has the lowest capacity, limiting the **peak hour Terminal 2 CBP volume at scheduled flight time to a maximum of 1,331 passengers**. The peak hour passenger volume is converted to an annual passenger volume using the peak hour ratio. The ratio and corresponding annual capacity are detailed in **Section 4.5**.

EXHIBIT 4.6: TERMINAL 2 U.S. CUSTOMS AND BORDER PROTECTION PROCESSING CAPACITY

	TSA Screening	CBP Preclearance
Hourly Passenger Capacity at Function	1,500	1,157
Presentation Profile	87%	87%
Hourly Passenger Capacity at Flight Time	1,725	1,331



SOURCE: Ricondo, **June 2026**.

4.2.6 TERMINAL 2 BAGGAGE HANDLING SYSTEM

The Terminal 1 and Terminal 2 outbound baggage handling systems were upgraded several years ago to comply with ECAC EDS Standard 3 screening requirements. The improvements included load sharing between devices, additional resilience through new baggage links between systems, and the ability to transfer bags between Terminal 1 and Terminal 2. The upgrades allow the outbound baggage systems to provide sufficient handling capacity to accommodate the induction capacity of the check-in systems under current operating procedures and assumptions. The capacity analysis assumes the outbound system matches the Terminal 2 check-in capacity summarised in **Section 4.2.4**.

4.2.7 TERMINAL 2 ARRIVALS

The Terminal 2 terminating arrivals process consists of immigration screening, baggage reclaim, customs screening, and the arrivals hall.

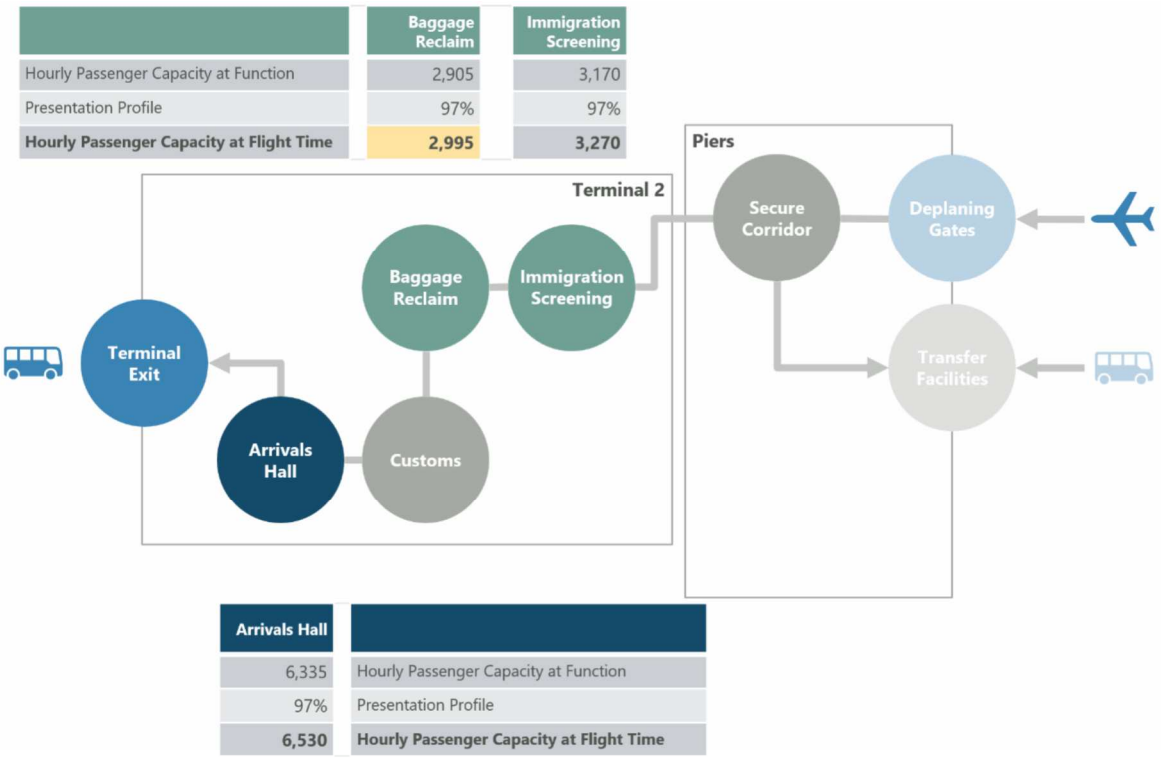
Peak hour capacity of each function is determined by an IATA ADRM methodology, which considers configuration, equipment, and operational characteristics. The corresponding peak hour capacity at scheduled flight departure time is determined by the proportional relationship represented by the passenger presentation profile. These factors are discussed in further detail in **Section 3**.

Exhibit 4.7 illustrates the Terminal 2 arrivals flow and the capacity of each individual function. Baggage reclaim has the lowest capacity, limiting the **peak hour Terminal 2 terminating arrivals volume at scheduled flight time to a maximum of 2,995 passengers**. The peak hour passenger volume is converted to an annual

passenger volume using the peak hour ratio. The ratio and corresponding annual capacity are detailed in **Section 4.5**.

See **Appendix A.1.4** for additional information on Terminal 2 Arrivals capacity.

EXHIBIT 4.7: TERMINAL 2 TERMINATING ARRIVALS CAPACITY



SOURCE: Ricondo, **June 2026**.

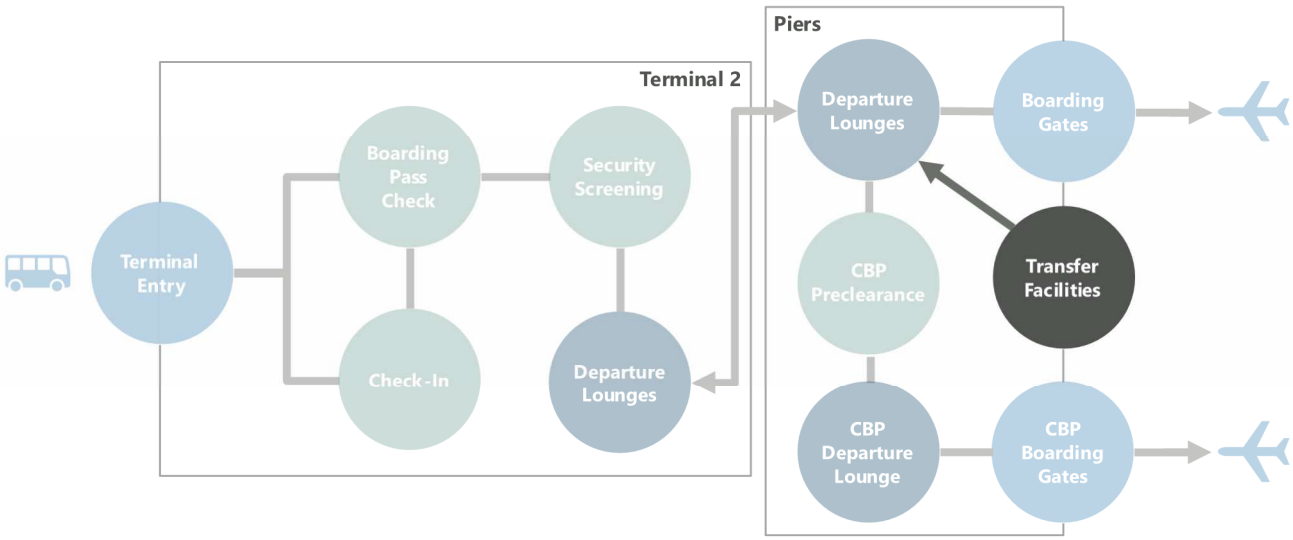
4.2.8 TERMINAL 2 TRANSFERS

The Terminal 2 transfers process consists of boarding pass verification for all transfer passengers, and security screening and immigration inspection for passengers arriving from or transferring to specific destinations. The limiting function in the transfer process is the boarding pass scan, which must be completed by all transfer passengers.

Peak hour capacity of each processing function is determined by an IATA ADRM methodology, which considers configuration, equipment, and operational characteristics. The corresponding peak hour capacity at scheduled flight departure time is determined by the proportional relationship represented by the passenger presentation profile. These factors are discussed in further detail in **Section 3**.

Exhibit 4.8 illustrates the Terminal 2 transfers flow and the hourly passenger capacity of the boarding pass scan function. This function limits the **peak hour Terminal 2 transfer volume at scheduled flight time to a maximum of 1,485 passengers**. The peak hour passenger volume is converted to an annual passenger volume using the peak hour ratio. The ratio and corresponding annual capacity are detailed in **Section 4.5**.

EXHIBIT 4.8: TERMINAL 2 TRANSFER CAPACITY



	Transfer Facilities
Hourly Passenger Capacity at Function	1,440
Presentation Profile	97%
Hourly Passenger Capacity at Flight Time	**1,485**

SOURCE: Ricondo, **June 2026**.

4.3 GATES AND STANDS

Aircraft boarding and deplaning processes are facilitated through a variety of gate facilities primarily located in the existing pier buildings. They provide holding areas for passenger pre-boarding, connectivity to aircraft stands through passenger boarding bridges (PBB) or walkout access to the apron, and connectivity to arrivals corridors, segregating arriving from departing passengers. Gate facilities that serve a mix of aircraft types and airline operations have complex vertical circulation and access control systems, facilitating multiple segregated passenger flows and holding facilities. For example, the Pier 4 gates are configured to serve multiple aircraft types and facilitate originating, terminating, transfer, and US preclearance departure flows.

Aircraft stands accommodate parked aircraft during the arrival and departure turnaround process, as well as for longer duration parking. Similar to gates, there are a variety of stand types that facilitate a range of operations, including narrow- and widebody aircraft sizes, and contact (PBB-served or walkout) or remote (bus-served) connectivity to gates.

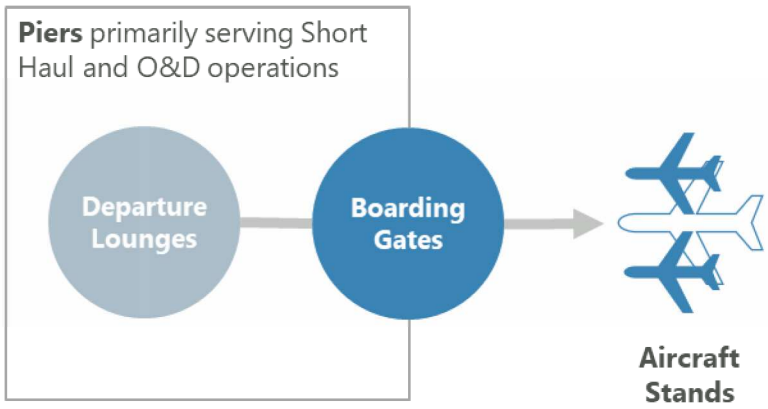
Assessing the capacity of gates and stands is complicated due to the distinct operational needs of different airlines and the level of common use across some of the available gate and stand inventory. For example, shared use of Pier 3 between Terminal 1 and Terminal 2 airlines, or shared use of remote apron facilities for long-duration parking. Aircraft parking durations are also a consideration in determining capacity – fast-turnaround narrowbody operations utilise stands at a higher rate than long-haul, full-service widebody operations.

Stand and gate capacity has been assessed for the total existing airport-wide inventory of 63 gates and 131 narrowbody equivalent (NBE) aircraft stands. The analysis establishes the average number of aircraft movements per gate or stand on a peak day, and the average number of peak day passengers per aircraft. These measures reflect the broader profile and characteristics of demand across the diverse range of airline operations at the

airport, as well as the distinct operational needs of individual airlines, which limit specific operational types to a specific set of gates and stands. These factors are discussed in further detail in **Appendix A, Sections A.2, A.3, and A.4.**

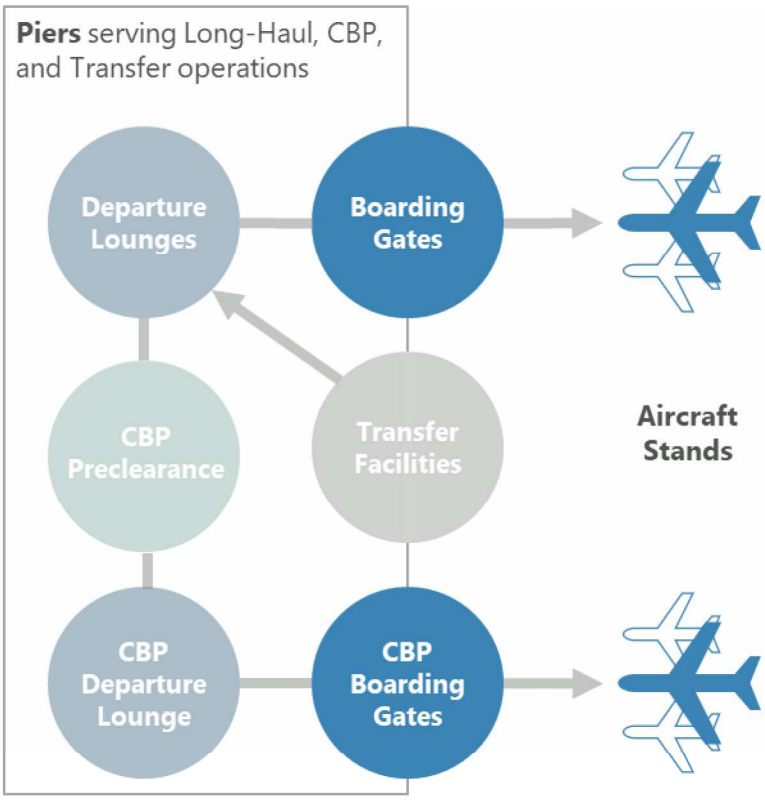
Exhibits 4.9 and **4.10** illustrate different operational types and the related connectivity required for gates and stands. The existing gate inventory can accommodate **a peak day passenger volume of 137,000 passengers**. The aircraft stand inventory can accommodate **a peak day passenger volume of 139,000 passengers**. The peak day passenger volume is converted to an annual passenger volume using the peak day ratio. The ratio and corresponding annual capacity are detailed in **Section 4.5**.

EXHIBIT 4.9: PIERS SERVING SHORT-HAUL, O&D OPERATIONS



SOURCE: Ricondo, **June 2026**.

EXHIBIT 4.10: PIERS SERVING LONG-HAUL, US CBP PRECLEARED, AND/OR TRANSFER OPERATIONS



SOURCE: Ricondo, **June 2026**.

4.4 AIRFIELD

Dublin Airport has two independent parallel runways (Runways 10R-28L and 10L-28R) and a single crosswind runway (Runway 16-34). The runways are connected to the aircraft parking aprons via a system of taxiways.

Runway 10L-28R, the north parallel runway, created a step change in airfield capacity when it was opened in 2022. The combined capacity of the two parallel runway system exceeds the current capacity of the other elements of the airport system.

4.5 EXISTING CAPACITY SUMMARY

The peak period existing capacity for each functional component of the Airport is converted to annual capacity using the corresponding peak period demand ratio and rounded to the nearest 0.5 million passengers per annum. The ratios and resulting annual function capacities are summarised in **Table 4.1**.

Peak period ratios represent the peak period demand per one million passengers per annum (MPPA) for each demand segment. For example, the peak period demand ratio for Terminal 1 departures is **355 peak hour** originating passengers **per one million annual** originating passengers. **Section 3** provides additional information on peak period ratios.

Continuing the above example, Terminal 1 peak hour departures capacity is 4,715 passengers. **Dividing the 4,715 peak hour passenger capacity** by the Terminal 1 originating **peak period demand ratio of 355 peak hour passengers per one million annual passengers**, establishes the corresponding annual Terminal 1 **annual departures capacity of 13.3 MPPA**.

The annual Terminal 1 terminating arrivals capacity, calculated in the same manner as Terminal 1 originating departures, is 17.2 MPPA, which is higher than the Terminal 1 departures capacity. A similar process is followed for Terminal 2 to calculate the 14.0 MPPA capacity shown in Table 4.1. Combining the Terminals 1 and 2 originating and terminating passenger capacities plus the transfer capacity value establishes 43.5 MPPA as the total terminal capacity.

Airlines book approximately the same volume of arriving and departing passengers, which limits total capacity to the lowest of the departures or arrivals processes, which means that on an annual basis, arrivals and departures demand are approximately equal and limited by the lower capacity. Equivalent capacities for the Terminal departures and arrivals functions are determined by selecting the lowest functional flow for each terminal and multiplying by two to represent the combined arrivals and departures capacity. As an example, in Table 4.1 the Terminal 1 departures capacity of 13.3 MPPA is lower than the Terminal 1 Arrivals capacity of 17.2 MPPA. The lower departures capacity is doubled (rounded to the nearest 05. MPPA) to represent the originating and terminating capacity of Terminal 1.

Boarding gates are the limiting functional component, establishing the current airport passenger capacity as **40.5 MPPA**.

TABLE 4.1: EXISTING CAPACITY SUMMARY

FACILITY	PEAK PERIOD	PEAK PERIOD CAPACITY	PEAK PERIOD DEMAND RATIO	ANNUAL FUNCTION CAPACITY (MPPA)	EQUIVALENT ANNUAL AIRPORT CAPACITY (MPPA)
TERMINAL PROCESSING CAPACITY					
Terminal 1					
Departures	Peak Hour Originating Passengers	4,715	355	**13.3**	26.5
Arrivals	Peak Hour Terminating Passengers	5,490	320	17.2	
Terminal 2					
Departures	Peak Hour Originating Passengers	3,565	510	7.0	14.0
Arrivals	Peak Hour Terminating Passengers	2,995	375	8.0	
Total Originating and Terminating Terminal Capacity					**40.5**
Terminal 2 Transfers	Peak Hour Transfer Passengers	1,485	955	**1.6**	3.0
Total Terminal Capacity					**43.5**
AIRCRAFT STANDS					
Aircraft Stands	Peak Day Total Passengers[1/]	139,000	3,400	41.0	
Total Aircraft Stand Capacity					**41.0**
BOARDING GATES					
Boarding Gates	Peak Day Total Passengers[1/]	137,000	3,400	40.5	
Total Boarding Gate Capacity					**40.5**
TOTAL AIRPORT CAPACITY[2/]					**40.5**

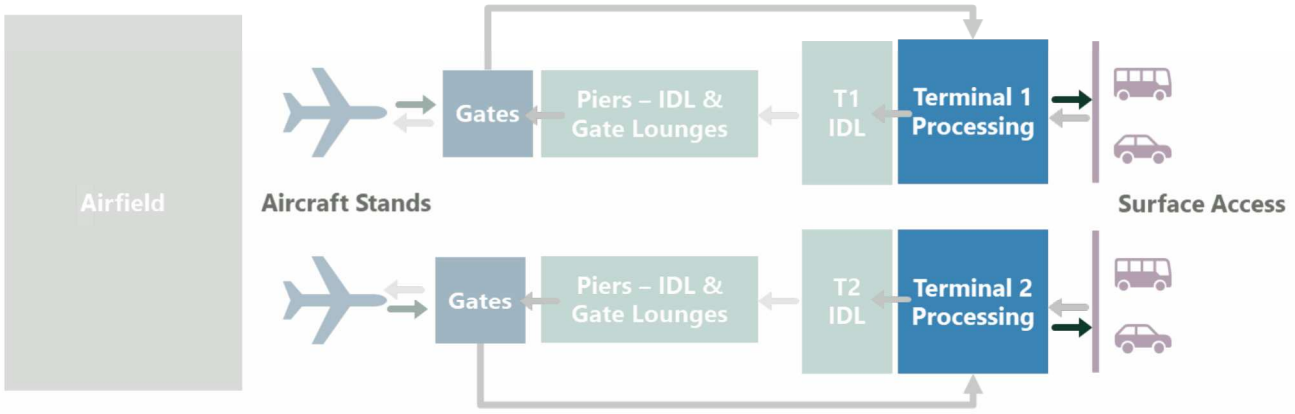
SOURCE: Ricondo, **June 2026**.
NOTES:
1/ Originating, terminating, transfer, and transit passengers
2/ Lowest of terminal, aircraft stands, and boarding gate capacities

APPENDIX A EXISTING CAPACITY

A.1 TERMINAL PROCESSOR FACILITIES

Exhibit A-1 illustrates the Terminal 1 and Terminal 2 processing facilities within the context of the overall airport system. Processing functions include facilities such as check-in and security screening for departing passengers and immigration screening and baggage reclaim for arriving passengers.

EXHIBIT A-1: DUBLIN AIRPORT FUNCTIONAL AREAS – TERMINAL PROCESSING FACILITIES



SOURCE: Ricondo, **June 2026**.

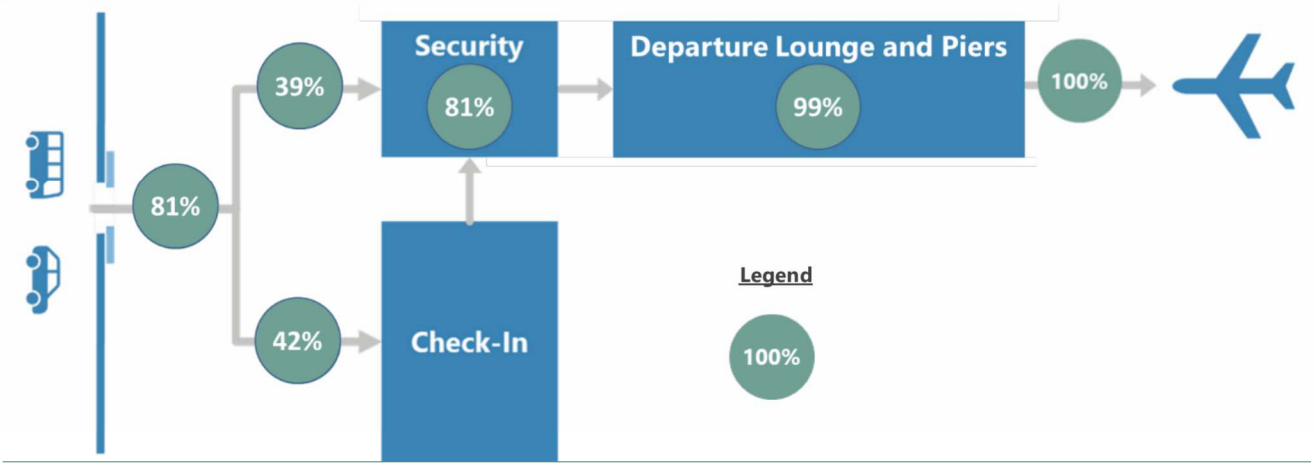
The following subsections provide an overview of the departing and arriving processing facilities for Terminal 1 and Terminal 2, and a summary of the corresponding peak hour capacity.

A.1.1 TERMINAL 1 DEPARTURES

Terminal 1 Departures is located on Level 2 of the building. The process flow, which is illustrated in **Exhibit A-2**, begins with passengers entering the terminal building from the drop-off kerbs, car park, and ground transportation centre.

The peak period volume of passengers presenting at each step in the process is directly proportional to the volume of passengers onboard aircraft during the peak period at flight departure time. **Exhibit A-2** illustrates the proportional presentation volumes for the Terminal 1 departures flow, which are represented as a percentage of the peak period passenger volume at scheduled flight departure time.

EXHIBIT A-2: TERMINAL 1 DEPARTURES FLOW



SOURCE: Ricondo, **June 2026**.

A.1.1.1 CHECK-IN

Departing passengers enter Terminal 1 from the ground transportation facilities via the departures or arrivals forecourt and proceed to the departures level. Passengers with carry-on bags and mobile or pre-printed boarding passes continue directly to the security screening area. All other passengers proceed to the check-in area to collect boarding passes and drop-off baggage.

Passenger Presentation Profile

As shown in **Exhibit A-2**, 81% of Terminal 1 peak departing passengers at flight time enter the terminal, of whom 39% proceed directly to security screening and 42% go to check-in. Passenger show-up characteristics and flow distribution result in a **peak check-in presentation volume equivalent to 42%** of the peak departing passenger volume at flight time.

Configuration and Equipment

The check-in area has eleven banks of check-in positions (Areas 3-13) at the Departures Level, and an additional bank of positions in Area 14 located below the Arrivals Level. Most of the desks in Areas 12 and 13 are configured as self-service bag drop positions which are accessed after passengers use kiosks to print baggage tags.

There are also ten kiosks located between Areas 3 to 11 which are available for check-in and accessing airline bag drop counters. Several counters can also be utilised as bag drop positions. Area 14 has twenty-four check-in desks and the capacity analysis assumes ten of the desks would be operated as bag drops supported by twenty kiosks.

Passenger Processing Characteristics

Average passenger processing times vary by airline and destination. Airline policies and destination type can influence the number of bags checked per passenger, and security and document check procedures can vary by destination. Average passenger processing times in Terminal 1 are slightly over 2 minutes per passenger for full-service check-in and are 45 seconds per passenger for bag-drop positions.

Other Operational Characteristics

Check-in facility allocation policies have a significant impact on the effective capacity of the available facilities. In Terminal 1, Areas 12 and 13 are dedicated to Ryanair; Areas 3-11 are operated as common-use facilities for over thirty other airlines operating in the terminal. Common-use allocation rules assign check-in positions to

airlines for fixed durations, usually three hours, in advance of departure times based on number of flights and aircraft seating size.

Allocation of check-in positions to multiple airlines with a range of upcoming flight departure times results in uneven distribution of passengers among the available desks – at any point in time some of the positions are very busy and some are quiet. This results in a lower effective capacity for the allocated positions than the theoretical processing capacity of all the allocated units.

In Terminal 1, the effective check-in capacity is further reduced by limitations in the available queuing areas between each of the eleven check-in banks.

Desk allocation and queue limitations result in an effective check-in capacity utilisation of **45%** for Agent Counters and **57%** of kiosk positions in Areas 3-11, and **64%** for Agent Counters and **70%** for Kiosks in Areas 12 and 13.

Peak Period Capacity Assessment

The IATA ADRM methodology was utilised to establish the maximum throughput capacity of the Terminal 1 check-in facilities. The assessment determined that the critical peak period duration is 60 minutes. **Appendix B** provides an overview of the IATA ADRM analysis.

Tables A-1.A and **A-1.B** provide a summary of the IATA ADRM methodology applied for Terminal 1 check-in facilities in the 2023 Baseline Capacity assessment and the 2026 Existing Capacity assessment, respectively. **Table A-1.C** summarizes the differences between the 2023 and 2026 data.

The 2026 Existing Capacity assessment detailed in Table **A-1.B** indicates the Terminal 1 passenger check-in processes can accommodate up to 3,585 presenting passengers per hour, equivalent to **8,520 peak hour passengers at scheduled flight time**.

TABLE A-1.A: 2023 TERMINAL 1 EFFECTIVE PEAK PERIOD CHECK-IN CAPACITY

	AGENT POSITIONS	KIOSKS	BAG DROPS	TOTAL CAPACITY
Effective Processing Capacity				
Number of Positions	102	10	33	
Average Passenger Processing Time per Position (seconds)	125	45	90	
Percent Effective Position Utilization	48%	57%	70%	
Critical Peak Period Duration (minutes)	60	60	60	
Effective Peak Period Processing Capacity (passengers)	**1,410**	**455**	**920**	**2,785**
Effective Queue Capacity				
Effective MQT (minutes)	15	5	5	
Effective Queue Capacity at MQT	355	40	75	
Available Critical Peak Period Capacity	**1,765**	**495**	**995**	**3,255**
			Processor Presentation Percentage of Peak Period at Flight Time	**42%**
			Peak Period Processor Capacity at Flight Time	**7,750**

SOURCE: daa; Ricondo analysis, February 2023.

TABLE A-1.B: 2026 TERMINAL 1 EFFECTIVE PEAK PERIOD CHECK-IN CAPACITY

	AGENT POSITIONS	KIOSKS	BAG DROPS	TOTAL CAPACITY	NOTES
Effective Processing Capacity					
Number of Positions	102	74	42		See Table B-1.C, Note 1
Average Passenger Processing Time per Position (seconds)	125	90	45		
Percent Effective Position Utilisation	48%	57%	70%		
Critical Peak Period Duration (minutes)	60	60	60		
Effective Peak Period Processing Capacity (passengers)	**1,410**	**1,680**	**2,340**	**3,090**	
Effective Queue Capacity					
Effective MQT (minutes)	15	5	5		
Effective Queue Capacity at MQT	355	140	195		
Available Critical Peak Period Capacity	**1,765**	**1,820**	**2,535**	**3,585**	
Processor Presentation Percentage of Peak Period at Flight Time				**42%**	
Peak Period Processor Capacity at Flight Time				**8,520**	

SOURCE: daa; Ricondo analysis, **June 2026**.

TABLE A-1.C: 2023 TO 2026 CHANGES - TERMINAL 1 CHECK-IN

CATEGORY	CHANGES FROM THE 2023 TO 2026 CAPACITY ASSESSMENTS
Equipment, Technology and Process Improvements	Updated to reflect changes in kiosk and bag drop deployment in the Terminal 1 Check-In facilities. Table also updated to reflect the Area 14 check-in facility with an assumed deployment of kiosks and bag drop facilities.
Demand Profile	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.
Existing vs. Baseline	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.

SOURCE: daa; Ricondo analysis, **June 2026**.

A.1.1.2 SECURITY SCREENING

The security screening checkpoints include two processing steps – an automated boarding pass scan to confirm eligibility to enter the airside, followed by the search process.

Passenger Presentation Profile

As illustrated in **Exhibit A-2**, a peak volume equivalent to 81% of the Terminal 1 peak departing passenger volume at flight time enters the terminal building from the ground transportation facilities, of which 39% continues directly to security and 42% proceeds to check-in. The check-in passengers recombine with the direct to security passengers, resulting in a **peak security presentation volume equivalent to 81%** of the peak departing passenger volume at flight time.

Configuration and Equipment

The automated boarding pass screening facility is configured with twelve autopass screening devices, including the fast-track devices. Passengers proceed through the autopass process and enter the search area.

The search process screens passengers and cabin baggage through fourteen security lanes in normal operations, including the fast-track lanes. Each lane is equipped with an automated tray retrieval system (ATRS), C3 baggage scanner, secondary screening areas, a multi-position pre-scanning divest area and a bag retrieval and recompose area.

The search process is configured with a single scanner for individual passenger screening for every two baggage screening lanes. The passenger screening devices have a higher capacity than the baggage screening process and do not limit lane capacity.

Passenger Processing Characteristics

Automated boarding pass screening is a quick, straightforward process that is incorporated into the queuing area prior to the search process. On average each automated boarding pass scan device can process a passenger every 10 seconds.

The security screening process has been upgraded to C3 equipment and reconfigured to provide additional positions since the 2023 Baseline Capacity assessment. The processing rates in the immediate post-deployment period are assumed to be 240 passengers per hour for the 2026 Existing Capacity assessment.

Other Operational Characteristics

The IATA ADRM recommends a range of contingency and resilience considerations for passenger and baggage security screening systems and equipment. The capacity assessment excludes security lanes reserved for operational contingencies. Total available inventory for normal operations is fourteen lanes.

Peak Period Capacity Assessment

The IATA ADRM methodology was utilised to establish the maximum throughput capacity of the Terminal 1 security screening facilities. The assessment determined that the critical peak period duration is 60 minutes.

Tables A-2.A and **A-2.B** provide a summary of the IATA ADRM methodology for the critical peak period duration in the 2023 Baseline Capacity assessment and the 2026 Existing Capacity assessment, respectively. **Table A-2.C** summarizes the differences between the 2023 and 2026 data.

The 2026 Existing Capacity assessment detailed in Table **A-2.B** indicates the Terminal 1 effective boarding pass scan processes can accommodate up to 9,960 presenting passengers per hour, equivalent to **12,295 peak hour passengers** at scheduled flight time.

TABLE A-2.A: 2023 TERMINAL 1 EFFECTIVE PEAK PERIOD BOARDING PASS SCAN

	AUTOPASS CHECK	TOTAL CAPACITY
Effective Processing Capacity		
Number of Positions	12	
Average Passenger Processing Time per Position (seconds)	10	
Critical Peak Period Duration (minutes)	60	
Effective Peak Period Processing Capacity (passengers)		**4,320**
Effective Queue Capacity		
Available Queue Area (square metres)	396	
Effective MQT (minutes)	5	
Effective Queue Capacity at MQT		360
AVAILABLE CRITICAL PEAK PERIOD CAPACITY		**4,680**
Processor Presentation Percentage of Peak Period at Flight Time		**81%**
Peak Period Processor Capacity at Flight Time		**5,780**

SOURCE: daa; Ricondo analysis, **February 2023**.

TABLE A-2.B: 2026 TERMINAL 1 EFFECTIVE PEAK PERIOD BOARDING PASS SCAN

	AUTOPASS CHECK	TOTAL CAPACITY	NOTES
Effective Processing Capacity			
Number of Positions (see Table B.2.C)	16		See Table B-2.C, Note 1
Average Passenger Processing Time per Position (seconds)	6		See Table B-2.C, Note 2
Critical Peak Period Duration (minutes)	60		
Effective Peak Period Processing Capacity (passengers)		**9,600**	
Effective Queue Capacity			
Available Queue Area (square metres)	396		
Effective MQT (minutes)	5		
Effective Queue Capacity at MQT		360	
AVAILABLE CRITICAL PEAK PERIOD CAPACITY		**9,960**	
Processor Presentation Percentage of Peak Period at Flight Time		**81%**	
Peak Period Processor Capacity at Flight Time		**12,295**	

SOURCE: daa; Ricondo analysis, **June 2026**.

TABLE A-2.C: 2023 TO 2026 CHANGES - TERMINAL 1 BOARDING PASS

CATEGORY		CHANGES FROM THE 2023 TO 2026 CAPACITY ASSESSMENTS
	**Equipment, Technology and Process Improvements**	Note 1: Additional boarding pass scan units have been deployed at Terminal 1 Central Search. Note 2: Updated boarding pass scan equipment process passengers faster than the 2023 equipment, increasing average throughput per unit.
	**Demand Profile**	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.
	**Existing vs. Baseline**	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.

SOURCE: daa; Ricondo analysis, **June 2026**.

Tables A-3.A and **A-3.B** provide a summary of the IATA ADRM methodology for the critical peak period duration in the 2023 Baseline Capacity assessment and the 2026 Existing Capacity assessment, respectively. **Table A-3.C** summarizes the differences between the 2023 and 2026 data.

The 2026 Existing Capacity assessment detailed in **Table A-3.B** indicates the Terminal 1 effective security screening processes can accommodate up to 3,570 presenting passengers per hour, equivalent to **4,405 peak hour passengers** at scheduled flight time.

TABLE A-3.A: 2023 TERMINAL 1 EFFECTIVE PEAK PERIOD SECURITY SEARCH

	SECURITY SCREENING	TOTAL CAPACITY
Effective Processing Capacity		
Number of Positions Available, Excluding Resilience	14	
Average Passenger Processing Time per Position (seconds)	16	
Critical Peak Period Duration (minutes)	60	
Efficiency Factor	91%	
Effective Peak Period Processing Capacity (passengers)		**2,880**
Effective Queue Capacity		
Available Queue Area (square metres)	660	
Effective MQT (minutes)	10	
Effective Queue Capacity at MQT		480
AVAILABLE CRITICAL PEAK PERIOD CAPACITY		**3,360**
Processor Presentation Percentage of Peak Period at Flight Time		**81%**
Peak Period Processor Capacity at Flight Time		**4,150**

SOURCE: daa; Ricondo analysis, **February 2023**.

TABLE A-3.B: 2026 TERMINAL 1 EFFECTIVE PEAK PERIOD SECURITY SEARCH

	SECURITY SCREENING	TOTAL CAPACITY	NOTES
Effective Processing Capacity			
Number of Positions Available, Excluding Resilience	14		
Average Passenger Processing Time per Position (seconds)	15		See Table B-3.C, Note 1
Critical Peak Period Duration (minutes)	60		
Efficiency Factor	91%		
Effective Peak Period Processing Capacity (passengers)		**3,060**	
Effective Queue Capacity			
Available Queue Area (square metres)	660		
Effective MQT (minutes)	10		
Effective Queue Capacity at MQT		510	
AVAILABLE CRITICAL PEAK PERIOD CAPACITY		**3,570**	
Processor Presentation Percentage of Peak Period at Flight Time		**81%**	
Peak Period Processor Capacity at Flight Time		**4,405**	

SOURCE: daa; Ricondo analysis, **June 2026**.

TABLE A-3.C: 2023 TO 2026 CHANGES - TERMINAL 1 SECURITY

CATEGORY	CHANGES FROM THE 2023 TO 2026 CAPACITY ASSESSMENTS
Equipment, Technology and Process Improvements	Note 1: new C3 cabin baggage screening equipment has been deployed in Terminal 1 Central Search, reducing the average processing time per passenger and increasing throughput per position.
Demand Profile	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.
Existing vs. Baseline	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.

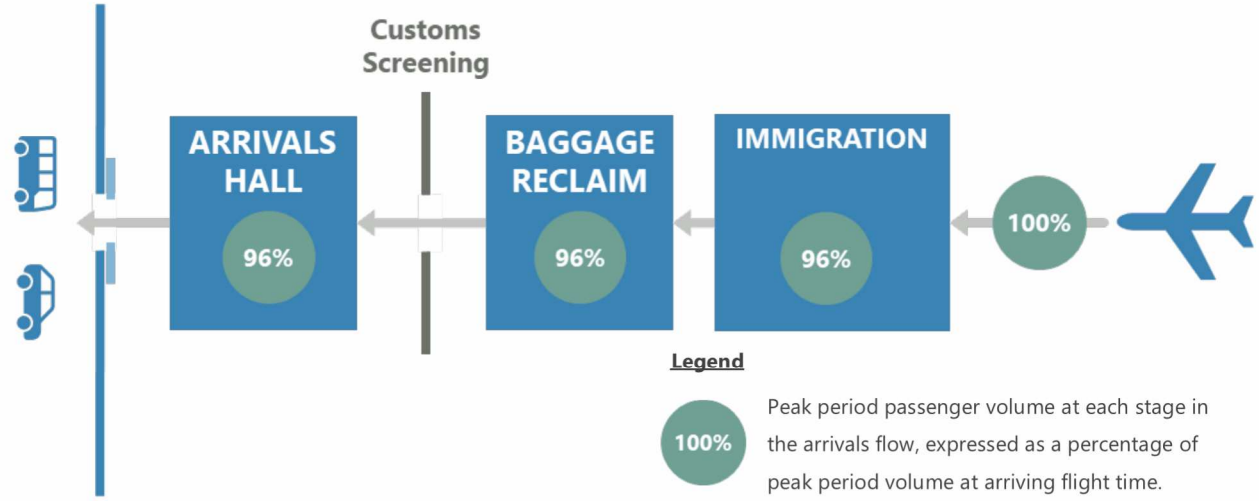
SOURCE: daa; Ricondo analysis, **June 2026**.

A.1.2 TERMINAL 1 ARRIVALS

Terminal 1 Arrivals is located on Level 1 of the building. The process flow, which is illustrated in **Exhibit A-3**, begins with passengers entering a sterile corridor via the arrival gate and proceeding to either the Pier 1 and 2 or Pier 3 immigration halls.

Following completion of immigration processing, passengers enter the baggage reclaim hall, collect any checked baggage, and exit through customs screening to the landside arrivals hall.

EXHIBIT A-3: TERMINAL 1 ARRIVALS FLOW



SOURCE: Ricondo, **June 2026**.

A.1.2.1 IMMIGRATION PROCESSING

Passengers arriving at Terminal 1 are processed at either the Pier 1 and 2 immigration hall, or the separate Pier 3 immigration hall, depending on which pier and gate handles the arriving aircraft. The two immigration facilities operate independently.

Passenger Presentation Profile

As illustrated in **Exhibit A-3**, a **peak presentation volume equivalent to 96%** of the Terminal 1 peak arriving passenger volume at flight arrival time enter the terminal building via sterile corridors connected to arrival gates.

Configuration and Equipment

Piers 1 and 2 are used primarily by short-haul operators serving UK and EU routes. Passengers access the immigration hall and enter the queue for either the staffed immigration desks or E-Gates facilities depending on eligibility and choice.

Pier 3 is used by a wide range of Terminal 1 Airlines, including most of the Terminal 1 widebody aircraft operators. Passengers access the immigration hall and enter the queue for the immigration booths.

Passenger Processing Characteristics

During the EU passenger arrival peak period, which is the most demanding peak period in the Pier 1 and 2 immigration hall the weighted average processing time for EU, Non-EU and North American passengers at the immigration booths is 18 seconds per passenger.

During the **Pier 3** arrival peak period, which has a much higher percentage of non-EU passengers compared to the Pier 1 and 2 arrivals passengers, the weighted average processing time for EU, Non-EU and North American passengers at the immigration booths is 43.3 seconds per passenger.

Peak Period Capacity Assessment

The IATA ADRM methodology was utilised to establish the maximum throughput capacity of the two arrival immigration facilities. The assessment determined that the critical peak period duration is 60 minutes.

In addition to the process flow capacity, the available queue space in the immigration halls was assessed to ensure the target queue time can be accommodated in the queue area. Both facilities have sufficient queue space available to accommodate queue volumes at the target level-of-service.

Tables A-4.A and **A-4.B** provide a summary of the IATA ADRM methodology for the critical peak period duration for the Pier 1 and 2 facilities in the 2023 Baseline Capacity assessment and the 2026 Existing Capacity assessment, respectively. **Table A-4.C** summarizes the differences between the 2023 and 2026 data.

The 2026 Existing Capacity assessment detailed in **Table A-4.B** indicates the Terminal 1 Pier 1 and 2 optimized immigration processes can accommodate up to 4,335 presenting passengers per hour, equivalent to **4,500 peak hour passengers** at scheduled flight time.

Tables A-6.A and **A-6.B** provide a summary of the IATA ADRM methodology for the critical peak period duration for combined Piers 1, 2 and 3 in the 2023 Baseline Capacity assessment and the 2026 Existing Capacity assessment, respectively. **Table A-6.C** summarizes the differences between the 2023 and 2026 data.

The 2026 Existing Capacity assessment detailed in **Table A-6.B** indicates the Terminal 1 combined immigration processes can accommodate up to 5,270 presenting passengers per hour, equivalent to **5,490 peak hour passengers** at scheduled flight time.

TABLE A-4.A: 2023 TERMINAL 1 PIER 1 AND 2 OPTIMISED PEAK PERIOD IMMIGRATION CAPACITY

	BOOTH POSITIONS	E-GATES	TOTAL CAPACITY
Effective Processing Capacity			
Number of Positions	15	20	
Average Passenger Processing Time per Position (seconds)	18.0	24.0	
Critical Peak Period Duration (minutes)	60	60	
Effective Peak Period Processing Capacity (passengers)	**2,995**	**3,000**	
Effective Queue Capacity			
Effective MQT (minutes)	10	5	
Effective Queue Capacity at MQT	499	250	
Queue Area Required at MQT (1.3m^2 per pax)	650	325	975
Queue Area Available			1035
Available Critical Peak Period Capacity	**3,645**	**3,325**	**6,970**
Processor Presentation Percentage of Peak Period at Flight Time			**96%**
Peak Period Processor Capacity at Flight Time			**7,260**

SOURCE: daa; Ricondo analysis, **October 2023**.

TABLE A-4.B: 2026 TERMINAL 1 PIER 1 AND 2 OPTIMISED PEAK PERIOD IMMIGRATION CAPACITY

	BOOTH POSITIONS	E-GATES	TOTAL CAPACITY	NOTES
Effective Processing Capacity				
Number of Positions	11	10		See Table B-4.C, Note 1
Average Passenger Processing Time per Position (seconds)	18.0	24.0		
Critical Peak Period Duration (minutes)	60	60		
Effective Peak Period Processing Capacity (passengers)	**2,195**	**1,500**		
Effective Queue Capacity				
Effective MQT (minutes)	10	5		
Effective Queue Capacity at MQT	365	125		
Queue Area Required at MQT (1.3m^2 per pax)	475	165	640	
Queue Area Available			720	See Table B-4.C, Note 1
Available Critical Peak Period Capacity	**2,670**	**1,665**	**4,335**	
Processor Presentation Percentage of Peak Period at Flight Time			**96%**	
Peak Period Processor Capacity at Flight Time			**4,500**	

SOURCE: daa; Ricondo analysis, **June 2026**.

TABLE A-4.C: 2023 TO 2026 CHANGES - TERMINAL 1 PIER 1 AND 2 IMMIGRATION

CATEGORY	CHANGES FROM THE 2023 TO 2026 CAPACITY ASSESSMENTS
Equipment, Technology and Process Improvements	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.
Demand Profile	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.
Existing vs. Baseline	Note 1: The 2023 Base Capacity assumed a planned operational reconfiguration within the footprint of the Pier 1 and 2 immigration facility. The planned reconfiguration has not yet been implemented. The 2026 Existing Capacity reflects the existing configuration, available positions and queue area.

SOURCE: daa; Ricondo analysis, **June 2026**.

Tables A-5.A and **A-5.B** provide a summary of the IATA ADRM methodology for the critical peak period duration for the Pier 3 facilities in the 2023 Baseline Capacity assessment and the 2026 Existing Capacity assessment, respectively. **Table A-5.C** summarizes the differences between the 2023 and 2026 data.

The 2026 Existing Capacity assessment detailed in **Table A-5.B** indicates the Terminal 1 Pier 3 optimized immigration processes can accommodate up to 934 presenting passengers per hour, equivalent to **970 peak hour passengers** at scheduled flight time.

TABLE A-5.A: 2023 TERMINAL 1 PIER 3 OPTIMISED PEAK PERIOD IMMIGRATION CAPACITY

	BOOTH POSITIONS	E-GATES	TOTAL CAPACITY
Effective Processing Capacity			
Number of Positions	12	4	
Average Passenger Processing Time per Position (seconds)	43.3	24.0	
Critical Peak Period Duration (minutes)	60	60	
Effective Peak Period Processing Capacity (passengers)	**995**	**600**	
Effective Queue Capacity			
Effective MQT (minutes)	10	5	
Effective Queue Capacity at MQT	166	50	
Queue Area Required at MQT (1.3m^2 per pax)	215	65	280
Queue Area Available			345
Available Critical Peak Period Capacity	**1,210**	**665**	**1,875**
Processor Presentation Percentage of Peak Period at Flight Time			**96%**
Peak Period Processor Capacity at Flight Time			**1,955**

SOURCE: daa; Ricondo analysis, **October 2023**.

TABLE A-5.B: 2026 TERMINAL 1 PIER 3 OPTIMISED PEAK PERIOD IMMIGRATION CAPACITY

	BOOTH POSITIONS	E-GATES	TOTAL CAPACITY	NOTES
Effective Processing Capacity				
Number of Positions	8	0		See Table B-5.C, Note 1
Average Passenger Processing Time per Position (seconds)	37.5	0		See Table B-5.C, Note 1
Critical Peak Period Duration (minutes)	60	0		See Table B-5.C, Note 1
Effective Peak Period Processing Capacity (passengers)	**768**	**0**		
Effective Queue Capacity				
Effective MQT (minutes)	10	0		
Effective Queue Capacity at MQT	128	0		
Queue Area Required at MQT (1.3m^2 per pax)	166	0	166	
Queue Area Available			160	See Table B-5.C, Note 1
Available Critical Peak Period Capacity	**934**	**0**	**934**	
Processor Presentation Percentage of Peak Period at Flight Time			**96%**	
Peak Period Processor Capacity at Flight Time			**970**	

SOURCE: daa; Ricondo analysis, **June 2026**.

TABLE A-5.C: 2023 TO 2026 CHANGES - TERMINAL 1 PIER 3 IMMIGRATION

CATEGORY	CHANGES FROM THE 2023 TO 2026 CAPACITY ASSESSMENTS
Equipment, Technology and Process Improvements	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.
Demand Profile	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.
Existing vs. Baseline	Note 1: The 2023 Base Capacity assumed a planned operational reconfiguration within the footprint of the Pier 1 and 2 immigration facility. The planned reconfiguration has not yet been implemented. The 2026 Existing Capacity reflects the existing configuration, available positions and queue area.

SOURCE: daa; Ricondo analysis, **June 2026**.

TABLE A-6.A: 2023 EFFECTIVE PEAK PERIOD TERMINAL 1 IMMIGRATION CAPACITY

	BOOTH POSITIONS	E-GATES	TOTAL CAPACITY
Pier 1 and 2 Critical Peak Period Capacity	3,645	3,325	6,970
Pier 3 Critical Peak Period Capacity	1,210	665	1,875
Available Critical Peak Period Capacity	**4,855**	**3,990**	**8,845**
Processor Presentation Percentage of Peak Period at Flight Time			**96%**
Peak Period Processor Capacity at Flight Time			**9,215**

SOURCE: daa; Ricondo analysis, **October 2023**.

TABLE A-6.B: 2026 EFFECTIVE PEAK PERIOD TERMINAL 1 IMMIGRATION CAPACITY

	BOOTH POSITIONS	E-GATES	TOTAL CAPACITY	NOTES
Pier 1 and 2 Critical Peak Period Capacity	2,670	1,665	4,335	See Table B-6.C, Note 1
Pier 3 Critical Peak Period Capacity	934	0	934	See Table B-6.C, Note 2
Available Critical Peak Period Capacity	**3,605**	**1,665**	**5,270**	
Processor Presentation Percentage of Peak Period at Flight Time			**96%**	
Peak Period Processor Capacity at Flight Time			**5,490**	

SOURCE: daa; Ricondo analysis, **June 2026**.

TABLE A-6.C: 2023 TO 2026 CHANGES - TERMINAL 1 IMMIGRATION

CATEGORY		CHANGES FROM THE 2023 TO 2026 CAPACITY ASSESSMENTS
	**Equipment, Technology and Process Improvements**	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.
	**Demand Profile**	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.
	**Existing vs. Baseline**	See Tables B-4.C and B-5.C for differences between the 2023 and 2026 assessments for the Terminal 1 Immigration Facilities.

SOURCE: daa; Ricondo analysis, **June 2026**.

A.1.2.2 BAGGAGE RECLAIM

The baggage reclaim hall capacity is assessed using a methodology developed from the IATA ADRM 12th edition approach to take into account both the total baggage reclaim device length available, and the accumulation space available for passengers.

Historical averages for passengers with bags and bags per flight from airport operational records are used to calculate the number of flights that can be accommodated in the hall at one time. The average length of allocation time per flight and corresponding number of arrivals that can be accommodated per hour is calculated, establishing the number of flights that can be handled in the peak hour.

Configuration and Equipment

Terminal 1 baggage reclaim devices can accommodate 740 total bags simultaneously. The available dwell space for passengers waiting to collect bags can accommodate up to 790 passengers simultaneously.

Peak Period Capacity Assessment

Tables A-7.A and **A-7.B** provide a summary of methodology for the critical peak period duration in the 2023 Baseline Capacity assessment and the 2026 Existing Capacity assessment, respectively. **Table A-7.C** summarizes the differences between the 2023 and 2026 data.

The 2026 Existing Capacity assessment detailed in **Table A-7.B** indicates the Terminal 1 improved baggage reclaim processes can accommodate up to 5,370 presenting passengers per hour, equivalent to **5,575 peak hour passengers** at scheduled flight time.

TABLE A-7.A: 2023 TERMINAL 1 IMPROVED BAGGAGE RECLAIM CAPACITY.

PROCESS	PASSENGERS	BAGS	LIMITING CAPACITY
Capacity All Devices	790	835	
Average Passenger with Bags and Bags per ATM	56	76	
Average Flights Accommodated Across All Devices Simultaneously	14.1	11.0	
Average Time to Clear from First Bag Delivery (mins)	15	15	
Flights That Can Be Accommodated in a Peak Hour	56	44	
Average Total Passengers per Flight	138	138	
Total Peak Hour Passenger Capacity	**7,780**	**6,060**	**6,060**
Processor Presentation Percentage of Peak Period at Flight Time			**96%**
Peak Period Processor Capacity at Flight Time			**6,315**

SOURCE: daa; Ricondo analysis, **October 2023**.

TABLE A-7.B: 2026 TERMINAL 1 EXISTING BAGGAGE RECLAIM CAPACITY.

PROCESS	PASSENGERS	BAGS	LIMITING CAPACITY	NOTES
Capacity All Devices	790	740		See Table B-7.C, Note 1
Average Passenger with Bags and Bags per ATM	56	76		
Average Flights Accommodated Across All Devices Simultaneously	14.3	9.7		See Table B-7.C, Note 2
Average Time to Clear from First Bag Delivery (mins)	15	15		
Average Flights That Can be Accommodated on All Devices	4	4		See Table B-7.C, Note 3
Flights That Can Be Accommodated in a Peak Hour	56	39		See Table B-7.C, Note 4
Average Total Passengers per Flight	138	138		
Total Peak Hour Passenger Capacity	**7,780**	**5,370**	**5,370**	
Processor Presentation Percentage of Peak Period at Flight Time			**96%**	
Peak Period Processor Capacity at Flight Time			**5,575**	

SOURCE: daa; Ricondo analysis, **June 2026**.

TABLE A-7.C: 2023 TO 2026 CHANGES - TERMINAL 1 BAGGAGE RECLAIM

CATEGORY		CHANGES FROM THE 2023 TO 2026 CAPACITY ASSESSMENTS
	**Equipment, Technology and Process Improvements**	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.
	**Demand Profile**	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.
	**Existing vs. Baseline**	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.

SOURCE: daa; Ricondo analysis, **June 2026**.

A.1.2.3 ARRIVALS HALL

Passengers proceed through the baggage reclaim hall, collect any checked baggage, and exit through customs screening to the Terminal 1 landside arrivals hall.

Peak Period Capacity Assessment

The arrivals hall capacity is calculated using the IATA ADRM methodology. **Table A-8** provides a summary of the methodology for the critical peak period duration. The Terminal 1 arrivals hall can accommodate up to 6,350 presenting passengers per hour, and **6,615 peak hour passengers** at scheduled flight time.

TABLE A-8: 2026 EFFECTIVE PEAK PERIOD TERMINAL 1 ARRIVALS HALL CAPACITY 1/

	VALUES
Effective Holding Capacity	
Area of Arrivals Hall (m^2)	3,175.0
Percent Effective Area Utilization for Dwell	50%
Effective Area	1,587.5
Seating Ratio	20%
Area Per Seated Person (m^2)	2.0
Area Per Standing Person (m^2)	2.0
Holding Capacity	**794**
Dwell Time Per Pax (minutes)	5.2
Dwell Time per Visitor (minutes)	43
Visitors Per Passenger	0.054
Available Critical Peak Period Capacity	**6,350**
Processor Presentation Percentage of Peak Period at Flight Time	**96%**
Peak Period Processor Capacity at Flight Time	**6,615**

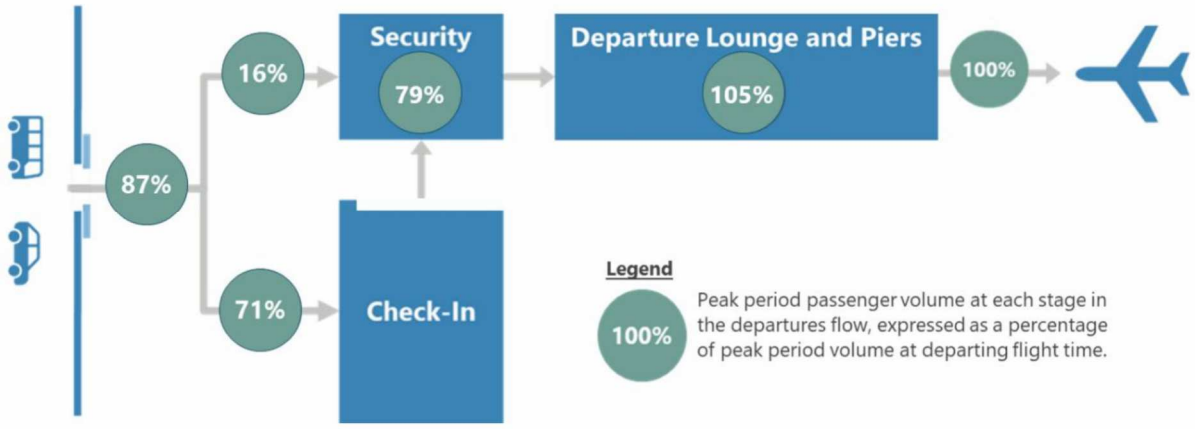
SOURCE: daa; Ricondo analysis, **June 2026.**
NOTES: 1/ No change from 2023 to 2026.

A.1.3 TERMINAL 2 DEPARTURES

Terminal 2 Departures is located on the ground floor and Level 2 of the building. The process flow, which is illustrated in **Exhibit A-4**, begins with passengers entering the terminal building from the ground floor drop-off kerbs, and car park. Departing passengers who originate their journey at Dublin Airport arrive at the terminal over an approximately three-hour period prior to flight departure time. **Exhibit A-5** illustrates the process flow for passengers departing directly to the U.S, which begins with passengers entering the TSA Screening facility from the Terminal 2 Departure Lounge.

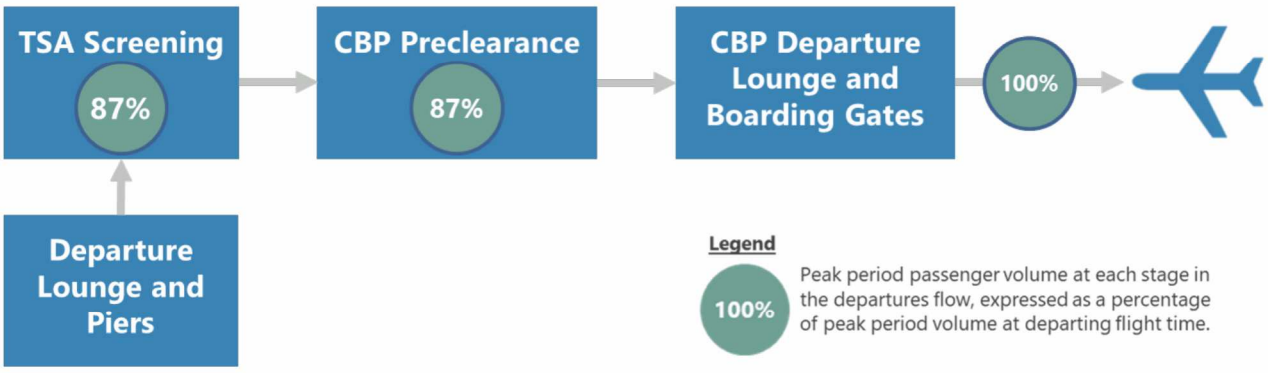
Dublin Airport operational data shows that the peak terminal entry volume is 87% of the peak passenger volume at flight departure time.

EXHIBIT A-4: TERMINAL 2 DEPARTURES FLOW



SOURCE: Ricondo, **June 2026**.

EXHIBIT A-5: TERMINAL 2 CBP FLOW



SOURCE: Ricondo, **June 2026**.

A.1.3.1 CHECK-IN

Departing passengers enter Terminal 2 from the ground transportation facilities via the departures level forecourt or the arrivals bridge from the Terminal 2 car park. Passengers with carry-on bags and mobile or pre-

printed boarding passes continue directly to the security screening area. All other passengers proceed to the check-in area to collect boarding passes and drop-off baggage.

Passenger Presentation Profile

As illustrated in **Exhibit A-4**, a peak presentation volume equivalent to 87% of the Terminal 2 peak departing passenger volume at flight time enters the terminal building from the ground transportation facilities, of which 16% continues directly to security and 71% proceeds to check-in. Passenger show-up characteristics and flow distribution result in a **peak check-in presentation volume equivalent to 71%** of the peak departing passenger volume at flight time.

Configuration and Equipment

The Terminal 2 check-in area is divided into two sections, the Aer Lingus check in facility in the west end of the hall, and US airlines and other airline check-in areas in the east end of the hall.

The Aer Lingus west hall shoreline check-in area has a total of 28 desks operated as a mix of conventional check-in desks, self bag drop desks and premium/business class check-in desks. The check-in area also includes self-service kiosk and bag weighing machines for Aer Lingus passengers for self check-in and bag tag printing.

The east hall shoreline check-in area has twenty-six conventional check-in desks allocated on a common-use basis between the multiple airlines that use this area. The area also accommodates airline and common use kiosks for OAL passengers.

Other Operational Characteristics

The policies governing allocation of check-in facilities to individual airlines have an important role in determining the effective capacity of the available facilities. Common-use allocation rules assign check-in positions to airlines for fixed durations, usually three hours, in advance of departure times based on number of flights and aircraft seating size.

Allocation of check-in positions to multiple airlines with a range of upcoming flight departure times results in uneven distribution of passengers among the available desks – at any point in time some of the positions are very busy and some are quiet. This results in a lower effective capacity for the allocated positions than the theoretical processing capacity of all the allocated units.

The current average passenger processing times in Terminal 2 are 133 seconds per passenger for full-service check-in and 45 seconds per passenger for the Aer Lingus bag-drop positions.

Peak Period Capacity Assessment

The IATA ADRM methodology was utilised to establish the maximum throughput capacity of the Terminal 1 check-in facilities. The assessment determined that the critical peak period duration is 60 minutes.

Tables A-9.A and **A-9.B** provide a summary of the methodology for the critical peak period duration in the 2023 Baseline Capacity assessment and the 2026 Existing Capacity assessment, respectively. **Table A-9.C** summarizes the differences between the 2023 and 2026 data.

The 2026 Existing Capacity assessment detailed in **Table A-9.B** indicates the Terminal 2 check-in processes can accommodate up to 2,530 presenting passengers per hour, equivalent to **3,560 peak hour passengers** at scheduled flight time.

TABLE A-9.A: 2023 TERMINAL 2 EFFECTIVE PEAK PERIOD CHECK-IN CAPACITY

	AGENT POSITIONS	BAG-DROP	TOTAL CAPACITY
Effective Processing Capacity			
Number of Positions	53	17	
Average Passenger Processing Time per Position (seconds)	133	45	
Critical Peak Period Duration (minutes)	60	60	
Effective Peak Period Processing Capacity (passengers)	**1,435**	**1,360**	**2,795**
Effective Queue Capacity			
Effective MQT (minutes)	15	5	
Effective Queue Capacity at MQT	360	115	
Available Critical Peak Period Capacity	**1,795**	**1,475**	**3,270**
Processor Presentation Percentage of Peak Period at Flight Time			**71%**
Peak Period Processor Capacity at Flight Time			**4,605**

SOURCE: daa; Ricondo analysis, **October 2023**.

TABLE A-9.B: 2026 TERMINAL 2 EFFECTIVE PEAK PERIOD CHECK-IN CAPACITY

	AGENT POSITIONS	BAG-DROP	TOTAL CAPACITY	NOTES
Effective Processing Capacity				
Number of Positions	44	12		See Table B-9.C, Note 1
Average Passenger Processing Time per Position (seconds)	133	45		
Critical Peak Period Duration (minutes)	60	60		
Effective Peak Period Processing Capacity (passengers)	**1,191**	**960**	**2,151**	
Effective Queue Capacity				
Effective MQT (minutes)	15	5		
Effective Queue Capacity at MQT	298	80		See Table B-9.C, Note 2
Available Critical Peak Period Capacity	**1,490**	**1,040**	**2,530**	
Processor Presentation Percentage of Peak Period at Flight Time			**71%**	
Peak Period Processor Capacity at Flight Time			**3,560**	

SOURCE: daa; Ricondo analysis, **June 2026**.

TABLE A-9.C: 2023 TO 2026 CHANGES - TERMINAL 2 CHECK-IN CAPACITY

CATEGORY		CHANGES FROM THE 2023 TO 2026 CAPACITY ASSESSMENTS
	**Equipment, Technology and Process Improvements**	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.
	**Demand Profile**	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.
	**Existing vs. Baseline**	Note 1: The 2023 Base Capacity assumed a planned operational reconfiguration within the footprint of the Terminal 2 check-in facility. The planned reconfiguration has not yet been implemented. The 2026 Existing Capacity reflects the existing configuration, available positions and queue area.

SOURCE: daa; Ricondo analysis, **June 2026**.

A.1.3.2 SECURITY SCREENING

The security screening checkpoints include two processing steps – a boarding pass check to confirm eligibility to enter the airside, followed by the search process.

Passenger Presentation Profile

As illustrated in **Exhibit A-4**, a peak volume equivalent to 87% of the Terminal 2 peak departing passenger volume at flight time enters the terminal building from the ground transportation facilities, of which 16% continues directly to security and 71% proceeds to check-in. The check-in passengers recombine with the direct to security passengers, resulting in a **peak security presentation volume equivalent to 87%** of the peak departing passenger volume at flight time.

Configuration and Equipment

The boarding pass screening process has been reconfigured within the existing security level footprint and is equipped with six autopass screening devices, including the fast-track devices.

Following boarding pass inspection, the search process has been reconfigured and re-equipped within the existing security level footprint. The process screen passengers and cabin baggage through sixteen security lanes, including the fast-track lanes. Each lane is equipped with a C3 baggage scanner, secondary screening areas, pre-scanning divest area and a bag retrieval and recompose area.

The search process is configured with a single scanner for individual passenger screening for every two baggage screening lanes. The passenger screening devices have a higher capacity than the baggage screening process and do not limit lane capacity.

Passenger Processing Characteristics

The automated boarding pass screening is a quick, simple process that is incorporated into the queuing area prior to the search process. On average each automated boarding pass scan device can process a passenger every 6 seconds.

Security screening processing rates in the immediate post-deployment period are assumed to be 225 passengers per hour for the 2026 Existing Capacity assessment.

Other Operational Characteristics

The IATA ADRM recommends a range of contingency and resilience considerations for passenger and baggage security screening systems and equipment. The capacity assessment excludes security lanes reserved for operational contingencies. Total available inventory for normal operations is sixteen lanes.

Peak Period Capacity Assessment

Tables A-10.A and **A-10.B** provide a summary of the capacity of the planned future Terminal 2 autopass screening process in the 2023 Baseline Capacity assessment and the 2026 Existing Capacity assessment, respectively. **Table A-10.C** summarizes the differences between the 2023 and 2026 data.

The 2026 Existing Capacity assessment detailed in **Table A-10.B** indicates the Terminal 2 autopass screening process can accommodate up to 3,900 presenting passengers per hour, equivalent to **4,485 peak hour passengers** at scheduled flight time.

Tables A-11.A and **A-11.B** provide a summary of the capacity of the improved security screening area in the 2023 Baseline Capacity assessment and the 2026 Existing Capacity assessment, respectively. **Table A-11.C** summarizes the differences between the 2023 and 2026 data.

The 2026 Existing Capacity assessment detailed in **Table A-11.B** indicates the Terminal 2 security screening area can accommodate up to 3,365 presenting passengers per hour, equivalent to **4,640 peak hour passengers** at scheduled flight time.

TABLE A-10.A: 2023 TERMINAL 2 IMPROVED AUTOPASS PEAK PERIOD CAPACITY

	AUTOPASS SCREENING	TOTAL CAPACITY
Effective Processing Capacity		
Number of Positions	10	
Average Passenger Processing Time per Position (seconds)	10	
Critical Peak Period Duration (minutes)	60	
Effective Peak Period Processing Capacity (passengers)		**3,600**
Effective Queue Capacity		
Available Queue Area (square metres)	**330**	
Effective MQT (minutes)	5	
Effective Queue Capacity at MQT		300
AVAILABLE CRITICAL PEAK PERIOD CAPACITY		**3,900**
Processor Presentation Percentage of Peak Period at Flight Time		**87%**
Peak Period Processor Capacity at Flight Time		**4,485**

SOURCE: daa; Ricondo analysis, **February 2023.**

TABLE A-10.B: 2026 TERMINAL 2 IMPROVED AUTOPASS PEAK PERIOD CAPACITY

	AUTOPASS SCREENING	TOTAL CAPACITY	NOTES
Effective Processing Capacity			
Number of Positions	6		See Table B-10.C, Note 1
Average Passenger Processing Time per Position (seconds)	6		See Table B-10.C, Note 2
Critical Peak Period Duration (minutes)	60		
Effective Peak Period Processing Capacity (passengers)		**3,600**	
Effective Queue Capacity			
Available Queue Area (square metres)	**330**		
Effective MQT (minutes)	5		
Effective Queue Capacity at MQT		300	
AVAILABLE CRITICAL PEAK PERIOD CAPACITY		**3,900**	
Processor Presentation Percentage of Peak Period at Flight Time		**87%**	
Peak Period Processor Capacity at Flight Time		**4,485**	

SOURCE: daa; Ricondo analysis, **June 2026**.

TABLE A-10.C: 2023 TO 2026 CHANGES - TERMINAL 2 BOARDING PASS SCAN

CATEGORY	CHANGES FROM THE 2023 TO 2026 CAPACITY ASSESSMENTS
Equipment, Technology and Process Improvements	Note 1: Number of boarding pass scan units deployed at Terminal 1 Central Search has changed. No change to overall throughput due to reduction in average processing time per passenger. Note 2: Updated boarding pass scan equipment process passengers faster than the 2023 equipment, increasing average throughput per unit.
Demand Profile	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.
Existing vs. Baseline	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.

SOURCE: daa; Ricondo analysis, **June 2026**.

TABLE A-11.A: 2023 TERMINAL 2 IMPROVED SECURITY PEAK PERIOD CAPACITY

	SECURITY SCREENING	TOTAL CAPACITY
Effective Processing Capacity		
Number of Positions Available, Excluding Resilience	11	
Average Passenger Processing Time per Position (seconds)	12	
Critical Peak Period Duration (minutes)	60	
Efficiency Factor	95%	
Effective Peak Period Processing Capacity (passengers)		**3,120**
Effective Queue Capacity		
Available Queue Area (square metres)	286	
Effective MQT (minutes)	5	
Effective Queue Capacity at MQT		260
AVAILABLE CRITICAL PEAK PERIOD CAPACITY		**3,380**
Processor Presentation Percentage of Peak Period at Flight Time		**87%**
Peak Period Processor Capacity at Flight Time		**3,885**

SOURCE: daa; Ricondo analysis, **February 2023.**

TABLE A-11.B: 2026 TERMINAL 2 IMPROVED SECURITY PEAK PERIOD CAPACITY

	SECURITY SCREENING	TOTAL CAPACITY	NOTES
Effective Processing Capacity			
Number of Positions Available, Excluding Resilience	16		See Table B-11.C, Note 1,2
Average Passenger Processing Time per Position (seconds)	16		See Table B-11.C, Note 1,2
Critical Peak Period Duration (minutes)	60		
Efficiency Factor	95%		
Effective Peak Period Processing Capacity (passengers)		**3,420**	
Effective Queue Capacity			
Available Queue Area (square metres)	286		
Effective MQT (minutes)	4.3		
Effective Queue Capacity at MQT		245	
AVAILABLE CRITICAL PEAK PERIOD CAPACITY		**3,665**	
Processor Presentation Percentage of Peak Period at Flight Time		**79%**	
Peak Period Processor Capacity at Flight Time		**4,640**	

SOURCE: daa; Ricondo analysis, **June 2026**.

TABLE A-11.C: 2023 TO 2026 CHANGES - TERMINAL 2 SECURITY

CATEGORY		CHANGES FROM THE 2023 TO 2026 CAPACITY ASSESSMENTS
	Equipment, Technology and Process Improvements	Note 1: new C3 cabin baggage screening equipment and additional screening positions have been deployed in Terminal 1 Central Search, reducing the average processing time per passenger and increasing throughput per position.
	Demand Profile	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.
	Existing vs. Baseline	Note 2: The 2023 Base Capacity assumed C3 equipment deployment within the footprint of the Terminal 2 central search facility. The equipment deployment and position additions have been implemented. The 2026 Existing Capacity reflects average processing times during the immediate post-deployment period.

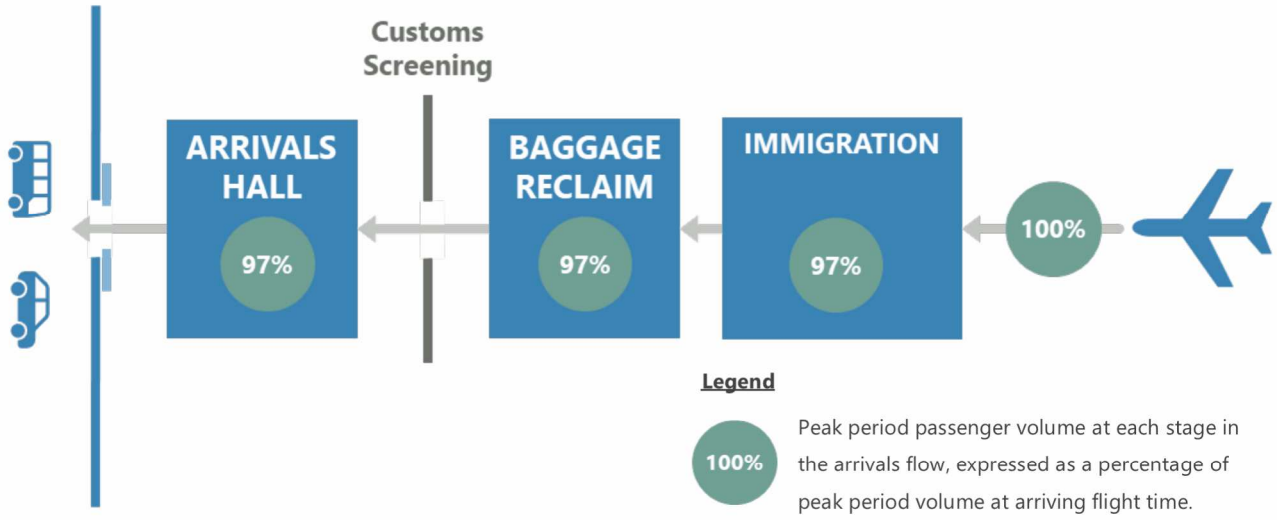
SOURCE: daa; Ricondo analysis, **June 2026**.

A.1.4 TERMINAL 2 ARRIVALS

Terminal 2 Arrivals is located on Level 2 of the building. The process flow, which is illustrated in **Exhibit A-6**, begins with passengers entering a sterile corridor via the arrival gate and proceeding to the Terminal 2 immigration hall.

Following completion of immigration processing, passengers enter the baggage reclaim hall, collect any checked baggage, and exit through customs screening to the landside arrivals hall.

EXHIBIT A-6: TERMINAL 2 ARRIVALS FLOW



SOURCE: Ricondo, **June 2026**.

A.1.4.1 IMMIGRATION PROCESSING

Passengers arriving at Terminal 2 are all processed at the immigration hall inside the Terminal 2 building.

Passenger Presentation Profile

As illustrated in **Exhibit A-5**, a **peak presentation volume equivalent to 97%** of the Terminal 1 peak arriving passenger volume at flight arrival time enter the terminal building via sterile corridors connected to arrival gates.

Configuration and Equipment

The Terminal 2 immigration hall is utilised by all of the Terminal 2 operators, serving a wide range of destinations including the UK, EU, North America, and the Middle East. Passengers access the immigration hall and enter the queue for either the staffed immigration desks or E-Gates facilities depending on eligibility and choice. The facility has twelve staffed immigration desks and 10 E-Gate positions.

Passenger Processing Characteristics

During the most demanding peak period the weighted average processing time for EU, Non-EU and North American passengers at the immigration booths is 33 seconds per passenger.

Peak Period Capacity Assessment

The IATA ADRM methodology was utilised to establish the maximum throughput capacity of the Terminal 2 arrival immigration facilities. The assessment determined that the critical peak period duration is 60 minutes.

In addition to the process flow capacity, the available queue space in the immigration halls was assessed to ensure the target queue time can be accommodated in the queue area. Both facilities have sufficient queue space available to accommodate queue volumes at the target level-of-service.

Tables A-12.A and **A-12.B** provide a summary of the IATA ADRM methodology for the critical peak period duration in the 2023 Baseline Capacity assessment and the 2026 Existing Capacity assessment, respectively. **Table A-12.C** summarizes the differences between the 2023 and 2026 data.

The 2026 Existing Capacity assessment detailed in **Table A-12.B** indicates the Terminal 2 immigration processes can accommodate up to 3,170 presenting passengers per hour, equivalent to **3,265 peak hour passengers** at scheduled flight time.

TABLE A-12.A: 2023 TERMINAL 2 EFFECTIVE PEAK PERIOD IMMIGRATION CAPACITY

	BOOTH POSITIONS	E-GATES	TOTAL CAPACITY
Effective Processing Capacity			
Number of Positions	12	10	
Average Passenger Processing Time per Position (seconds)	32.7	24.0	
Critical Peak Period Duration (minutes)	60	60	
Effective Peak Period Processing Capacity (passengers)	**1,320**	**1,500**	
Effective Queue Capacity			
Effective MQT (minutes)	10	5	
Effective Queue Capacity at MQT	220	125	
Queue Area Required at MQT (1.3m^2 per pax)	**286**	**163**	**449**
Queue Area Available			580
Available Critical Peak Period Capacity	**1,606**	**1,663**	**3,270**
Processor Presentation Percentage of Peak Period at Flight Time			**97%**
Peak Period Processor Capacity at Flight Time			**3,370**

SOURCE: daa; Ricondo analysis, **February 2023.**

TABLE A-12.B: 2026 TERMINAL 2 EFFECTIVE PEAK PERIOD IMMIGRATION CAPACITY

	BOOTH POSITIONS	E-GATES	TOTAL CAPACITY	NOTES
Effective Processing Capacity				
Number of Positions	12	10		
Average Passenger Processing Time per Position (seconds)	32.7	24.0		
Critical Peak Period Duration (minutes)	60	60		
Effective Peak Period Processing Capacity (passengers)	**1,320**	**1,500**		
Effective Queue Capacity				
Effective MQT (minutes)	10	5		
Effective Queue Capacity at MQT	220	125		
Queue Area Required at MQT (1.3m^2 per pax)	**286**	**163**	**449**	
Queue Area Available			580	
Available Critical Peak Period Capacity	**1,545**	**1,625**	**3,170**	2023 calculation error corrected
Processor Presentation Percentage of Peak Period at Flight Time			**97%**	
Peak Period Processor Capacity at Flight Time			**3,265**	

SOURCE: daa; Ricondo analysis, **June 2026**.

TABLE A-12.C: 2023 TO 2026 CHANGES - TERMINAL 2 IMMIGRATION

CATEGORY		CHANGES FROM THE 2023 TO 2026 CAPACITY ASSESSMENTS
	**Equipment, Technology and Process Improvements**	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.
	**Demand Profile**	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.
	**Existing vs. Baseline**	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.

SOURCE: daa; Ricondo analysis, **June 2026**.

A.1.4.2 BAGGAGE RECLAIM

The baggage reclaim hall capacity assessment uses a methodology developed from the IATA ADRM 12th edition approach, evaluating the total baggage reclaim device length available and the accumulation space available for passengers.

Historical averages for passengers with bags and bags per flight from airport operational records are used to calculate the number of flights that can be accommodated in the hall at one time. The average length of allocation time per flight and corresponding number of arrivals that can be accommodated per hour establishes the number of flights that can be handled in the peak hour.

Peak Period Capacity Assessment

Table A-13 provides a summary of the methodology for the critical peak period duration. The Terminal 1 baggage reclaim hall devices can accommodate up to 2,904 presenting passengers per hour limited by the belt length, and **2,995 peak hour passengers** at scheduled flight time.

TABLE A-13: 2026 TERMINAL 1 BAGGAGE RECLAIM CAPACITY[1/]

PROCESS	PASSENGERS	BAGS	LIMITING CAPACITY
Capacity All Devices	1,517	572	
Average Pax and Bags per ATM	75	95	
Average Flights accommodated on all devices	20	6	
Average time to clear from first bag delivery (mins)	15	15	
Average no. of flights that can be accommodated on all devices	4	4	
No. of flights that can be accommodated in a peak hour	81	24	
Average total passengers per flight	120	120	
Total peak hour passenger capacity ==>	**9,773**	**2,904**	**2,904**
		Processor Presentation Percentage of Peak Period at Flight Time	**97%**
		Peak Period Processor Capacity at Flight Time	**2,995**

SOURCE: daa; Ricondo analysis, **June 2026.**
NOTES: 1/ No change from 2023 to 2026.

A.1.4.3 ARRIVALS HALL

Passengers proceed through the baggage reclaim hall, collect any checked baggage, and exit through customs screening to the Terminal 2 landside arrivals hall.

Peak Period Capacity Assessment

The arrivals hall capacity is calculated using the IATA ADRM methodology. **Table A-14** provides a summary of the methodology for the critical peak period duration. The Terminal 1 arrivals hall can accommodate up to 6,335 presenting passengers per hour, and **6,530 peak hour passengers** at scheduled flight time.

TABLE A-14: 2026 EFFECTIVE PEAK PERIOD TERMINAL 2 ARRIVALS HALL CAPACITY[1/]

	VALUES
Effective Holding Capacity	
Area of Arrivals Hall (m^2)	3,488.0
Percent Effective Position Utilization	50%
Effective Area	1,744.0
Seating Ratio	20%
Area Per Seated Person (m^2)	2.0
Area Per Standing Person (m^2)	2.0
Holding Capacity	872
Dwell Time Per Pax (minutes)	5.2
Dwell Time per Visitor (minutes)	54.67
Visitors Per Passenger	0.056
Available Critical Peak Period Capacity	**6,335**
Processor Presentation Percentage of Peak Period at Flight Time	**97%**
Peak Period Processor Capacity at Flight Time	**6,530**

SOURCE: daa; Ricondo analysis, **June 2026.**
NOTES:
1/ No change from 2023 to 2026.

A.2 TERMINAL AND PIER DEPARTURE AND GATE LOUNGE FACILITIES

Post-security passenger dwell facilities including the terminal departure lounge areas, a mix of duty free, travel retail, food & beverage, airline clubs, and seating areas; and pier gate lounge areas, including travel retail, food & beverage, seating areas and pre-boarding areas at individual gates.

A.2.1 FACILITIES UTILISED BY TERMINAL 1 PASSENGERS

Originating passengers flow from the security screening checkpoint to the Terminal 1 departures lounge area.

Passenger Presentation Profile

As illustrated in **Exhibit A-2**, the **peak post-security accumulation volume is equivalent to 99%** of the Terminal 1 peak departing passenger volume at flight time.

Functional Configuration

Post-security, pre-boarding space accommodates a mix of functions within the Terminal 1 departures lounge and in the connected pier facilities. The Terminal 1 departures lounge provides a mix of duty free, travel retail, and food and beverage services, integrated with waiting areas and other passenger amenities. The existing Terminal 1 departures lounge area has a total gross floor area (GFA) of 10,597 square metres of passenger accessible space, excluding back-of-house storage and support facilities.

The accessible areas in Piers 1, 2 and 3 provide a further 6,312 square meters of duty free, retail and gate lounge space for passengers to wait for boarding.

Space Utilisation Characteristics

The capacity assessment process applies an optimal occupancy density for the major space categories – retail, food and beverage, waiting areas, and circulation – which corresponds to the unit capacity of each type of space to accommodate passengers at an acceptable level-of-service. The occupancy densities vary based on the function of each category and all exceed the minimum IATA ADRM standards for optimal occupancy levels.

The capacity of the departures lounge to accommodate passengers is determined by the total GFA of each space category and the corresponding occupancy density (GFA per passenger). **Table A-15** details GFA and occupancy density for each of the major space categories and the resulting occupancy capacity of the Terminal 1 departures lounge.

Peak Period Capacity Assessment

Table A-15 provides a summary of the IATA ADRM methodology for the peak population in the departures area. The Terminal 1 departures area can accommodate up to 6,255 passengers, equivalent to **6,320 peak hour passengers** at scheduled flight time.

TABLE A-15: 2026 TERMINAL 1 DEPARTURE LOUNGE AND PIER DWELL CAPACITY[1/]

SPACE CATEGORY		EXISTING GFA (SQUARE METRES)	OCCUPANCY DENSITY (SQUARE METRES PER PASSENGER)	MAXIMUM OCCUPANCY (PASSENGERS)
Duty Free and Other Retail		4,035	4.5	897
Food and Beverage		2,623	3.5	749
Waiting Areas		255	2.0	128
Circulation		3,684	2.0	1,842
Pier 1	Duty Free & Retail	210	4.5	47
	Holdrooms	2,099	2.0	1,050
Pier 2	Duty Free & Retail	106	4.5	24
	Holdrooms	2,169	2.0	1,085
Pier 3	Duty Free & Retail	1,542	4.5	343
	Holdrooms	186	2.0	93
AVAILABLE PEAK PERIOD OCCUPANCY CAPACITY		**16,909**	**2.7**	**6,255**
			Processor Presentation Percentage of Peak Period at Flight Time	**99%**
			Peak Period Processor Capacity at Flight Time	**6,320**

SOURCE: daa; Ricondo analysis, **June 2026**.
NOTES: No change from 2023 to 2026.

A.2.2 FACILITIES UTILISED BY TERMINAL 2 PASSENGERS

Passenger Presentation Profile

As illustrated in **Exhibit A-4**, the **peak post-security accumulation volume is equivalent to 105%** of the Terminal 2 peak departing passenger volume at flight time. Terminal 2 accumulates a higher volume of passengers in the post-security departures facilities relative to the peak departing passenger volume onboard aircraft during the peak departure hour due to extended show-up profiles for a higher proportion of long-haul departures and the timing of transfer passenger arrivals prior to the departures peak.

Functional Configuration

Originating passengers flow from the security screening checkpoint to the Terminal 2 departures lounge area, which provides a mix of duty-free, travel retail, and food and beverage services, integrated with waiting areas and other passenger amenities. The existing Terminal 2 departures lounge area has a total gross floor area (GFA) of 9,878 square metres of passenger accessible space, excluding back-of-house storage and support facilities.

The Pier 4 areas are also included, adding an additional 3,002 square meters of passenger accumulation space.

The capacity assessment process applies an optimal occupancy density for the major space categories – Retail, Food and Beverage, Waiting Areas, and Circulation – which corresponds to the unit capacity of each type of space to accommodate passengers at an acceptable level-of-service. The occupancy densities vary based on the function of each category and all exceed the minimum IATA ADRM standards for optimal occupancy levels.

The capacity of the departures lounge to accommodate passengers is determined by the total GFA of each space category and the corresponding occupancy density (GFA per passenger). **Table A-16** details GFA and occupancy density for each of the major space categories and the resulting occupancy capacity of the Terminal 2 departures lounge.

Peak Period Capacity Assessment

Table A-16 provides a summary of the IATA ADRM methodology for the peak population in the departures area. The Terminal 2 departures area can accommodate up to 4,940 passengers per hour, equivalent to **4,990 peak hour passengers** at scheduled flight time.

TABLE A-16: 2026 TERMINAL 2 DEPARTURE LOUNGE CAPACITY[1/]

SPACE CATEGORY		EXISTING GFA (SQUARE METRES)	OCCUPANCY DENSITY (SQUARE METRES PER PASSENGER)	MAXIMUM OCCUPANCY (PASSENGERS)
Duty Free and Other Retail		3,557	4.5	790
Food and Beverage		2,017	3.5	576
Waiting Areas		518	2.0	259
Circulation		3,786	2.0	1,893
Pier 4 Level 1	Duty Free & Retail	232	4.5	52
	Food and Beverage	70	3.5	20
	Holdrooms	2,700	2.0	1,350
AVAILABLE PEAK PERIOD OCCUPANCY CAPACITY		**12,880**	**2.6**	**4,940**
		Processor Presentation Percentage of Peak Period at Flight Time		**105%**
		Peak Period Processor Capacity at Flight Time		**4,705**

SOURCE: daa; Ricondo analysis, **June 2026**.
NOTES: No change from 2023 to 2026.

A.3 PASSENGER BOARDING GATES

Passenger boarding facilities are provided to assemble passengers prior to accessing the aircraft via a boarding gate. To enable on time departure of flights, airlines call passengers to assemble at the gates ahead of departure so that when the aircraft is ready for boarding, the aircraft can be loaded quickly and efficiently.

Passenger boarding gates are categorised into the following groups:

- Contact gates – direct connection for aircraft boarding and deplaning via an airbridge.
- Contact US CBP preclearance gate – a contact gate serving the segregated US CBP precleared area.
- Walkout gate – a gate with direct access to the apron and marshalled access to aircraft via stairs.
- Remote bus gate – a gate where passengers board a bus to be transported to the departure aircraft.

The current passenger boarding gate inventory is shown in **Table A-17**. **Table A-18.A** presents the estimated capacity of the existing gate inventory, assuming 0% contingency available for redundancy and resilience in the

2023 Baseline Capacity assessment and the 2026 Existing Capacity assessment, respectively. **Table A-18.B** summarizes the differences between the 2023 and 2026 data.

The 2026 Existing Capacity assessment detailed in **Table A-18.A** indicates the boarding gates can accommodate up to 137,000 busy day passengers, equivalent to **40.5 MPPA**.

TABLE A-17: 2026 PASSENGER BOARDING GATES [1/]

AREA	APRON	TYPE	NARROWBODY EQUIVALENT GATES
North	Pier 1	Remote	1
		Walkout	15
Terminal	Pier 2	Remote	2
		Walkout	8
	OCTB	Walkout	1
	Pier 3	Walkout	1
		Contact	7
	Pier C	Remote	4
South	Pier 4	Contact US CBP	15
		Contact	4
	South Apron	Remote	5
		Total	**63**

SOURCE: daa; Ricondo analysis, **June 2026**.
NOTES:
1/ No change from 2023 to 2026.

TABLE A-18.A: 2026 PASSENGER BOARDING GATES CAPACITY CALCULATION

CATEGORY	2023 BASELINE	2026 EXISTING	NOTES
AVAILABLE GATES			
Gate Inventory	63	63	
Operational Reserve	0	0	
Available Operational Gates	**63**	**63**	
BUSY DAY AIRCRAFT MOVEMENT CAPACITY			
Aircraft Movements per Gate	13.6	13.6	
Busy Day Aircraft Movements Capacity	**857**	**857**	
BUSY DAY PASSENGER CAPACITY			
Average Aircraft Seat Size	165	170	Aircraft operating at the airport increased in size from 2019 to 2025
Average Load Factor	90%	94%	The average percentage of aircraft seats filled increased from 2019 to 2025
Average Passengers per Aircraft Movement	149	160	Larger aircraft and higher load factors increased average passengers per aircraft from 2019 to 2025
Busy Day Passengers	**127,000**	**137,000**	
ANNUAL PASSENGER CAPACITY			
Busy Day Passengers per MPPA[1/]	3,500	3,400	Passenger volumes were slightly higher during non-busy days in 2025 compared to 2019
Annual Passenger Capacity	**36.5 MPPA**	**40.5 MPPA**	

SOURCE: daa; Ricondo analysis, **June 2026**.
NOTES:
1/ MPPA = million passengers per annum

TABLE A-18.B: 2023 TO 2026 CHANGES - BOARDING GATES

CATEGORY	CHANGES FROM THE 2023 TO 2026 CAPACITY ASSESSMENTS
Equipment, Technology and Process Improvements	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.
Demand Profile	Aircraft movement capacity remains the same. Average passengers per aircraft movement has increased. The number of seats per aircraft and load factor during a busy day at Dublin Airport has increased since 2019, the last year of the dataset analysed in the 2023 Capacity Report.
Existing vs. Baseline	No. change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.

SOURCE: daa; Ricondo analysis, **June 2026**.

A.4 AIRCRAFT STANDS

Aircraft stands are required to park aircraft when they arrive at the airport. Operational stands are categorised into the following groups:

- Contact stands – adjacent to pier facilities and served by an airbridge.
- Contact preclearance capable – contact stands that connect to the US CBP segregated precleared area.
- Walkout stands – stands adjacent to pier facilities with pedestrian access from the building to the apron and marshalled access to the aircraft via stairs.
- Remote stands – stands not adjacent to pier facilities and served by bus from a remote boarding lounge.
- Inactive stands – stands not used for active operations, primarily utilised for long-ground time aircraft.
- Cargo stands – stands that are used by freighter aircraft, with access to specialised cargo loading equipment.

In addition to the operational stands, it is typical to provide several contingency stands for based carrier standby aircraft, for eventualities related to schedule disruption, and for performing unscheduled maintenance.

Table A-19 provides an inventory of available aircraft stands. **Table A-20.A** presents the Dublin Airport aircraft stands capacity assessment. The table presents the updated 2026 capacity calculation alongside the corresponding 2023 Capacity Report calculation. **Table A-20.B** summarizes the differences between the 2023 and 2026 data.

The 2026 Existing Capacity assessment detailed in Table **A-20.A** indicates the aircraft stands can accommodate up to 139,000 busy day passengers, equivalent to **41.0 MPPA**.

TABLE A-19: 2026 AIRCRAFT STANDS[1/]

AREA	APRON	STAND TYPE	NARROWBODY EQUIVALENT STANDS (NBES)
North	Hangars	Remote	3
	Pier 1	Remote	3
		Walkout	20
	Apron 5G	Remote	15
	Apron 5H	Remote	12
Terminal	Island	Remote	5
	Pier 2	Walkout	9
	OCTB	Walkout	1
	Pier 3	Walkout	3
		Contact	8
South	Pier 4	Contact US CBP	15
		Contact	4
	South Apron	Remote	9
West	West Apron	Inactive / Cargo	24
		Total	**131**

SOURCE: daa; Ricondo analysis, **June 2026**.
NOTE: 1/ No change from 2023 to 2026.

TABLE A-20.A: 2026 AIRCRAFT STANDS CAPACITY CALCULATION

CATEGORY	2023 BASELINE	2026 EXISTING	NOTES
AVAILABLE STANDS			
Stand Inventory (NBE)[1/]	131	131	Apron 5H was included as an approved project in the 2023 Baseline and has since been completed
Standby; Reserve; Resilience (NBE)	-10	-10	
Available Operational Stands (NBE)	**121**	**121**	
BUSY DAY AIRCRAFT MOVEMENT CAPACITY			
Average Aircraft Movements per Stand	7.2	7.2	
Busy Day Aircraft Movements	**871**	**871**	
BUSY DAY PASSENGER CAPACITY			
Average Aircraft Seat Size	165	170	Aircraft operating at the airport increased in size from 2019 to 2025
Average Load Factor	90%	94%	The average percentage of aircraft seats filled increased from 2019 to 2025
Average Passengers per Aircraft Movement	149	160	Larger aircraft and higher load factors increased average passengers per aircraft from 2019 to 2025
Busy Day Passengers	**129,500**	**139,000**	
ANNUAL PASSENGER CAPACITY			
Busy Day Passengers per MPPA[2/]	3,500	3,400	Passenger volumes were slightly higher during non-busy days in 2025 compared to 2019
Annual Passenger Capacity	**37.0 MPPA**	**41.0 MPPA**	

SOURCE: daa; Ricondo analysis, **June 2026**.
NOTES:
1/ NBE = narrowbody equivalent aircraft, 2/ MPPA = million passengers per annum

TABLE A-20.B: 2023 TO 2026 CHANGES - AIRCRAFT STANDS

CATEGORY	CHANGES FROM THE 2023 TO 2026 CAPACITY ASSESSMENTS
Equipment, Technology and Process Improvements	No change from the 2023 Capacity Assessment to the 2026 Capacity Assessment for this category.
Demand Profile	Aircraft movement capacity remains the same. Average passengers per aircraft movement have increased. The number of seats per aircraft and load factor during a busy day at Dublin Airport has increased since 2019, the last year of the dataset analysed in the 2023 Capacity Report.
Existing vs. Baseline	No. change. The 2023 Capacity Report included the then planned future Apron 5H in the baseline capacity. The 12 aircraft stands of Apron 5H have since been completed and are included in the 2026 Capacity Report.

SOURCE: daa; Ricondo analysis, June 2026

APPENDIX B SUPPORTING TECHNICAL INFORMATION

B.1 UNIT PROCESSOR CAPACITY APPROACH

The IATA ADRM 12th Edition proposes an approach based on a static assessment of the most constraining of five different peak period demand levels: The peak 15-, 30-, 60-, 120-and 240-minute periods.

These five demand levels are tested against the processing rate and queue time to provide five facility requirement figures, the worst case of which should then be used as the facility requirement.

The facility requirement formula used is shown below:

$$Unit\ Requirement = (Demand \times Process\ Time/60)/(Period + MQT)$$

Where *Demand* is the relevant peak period figure, *Period* is the number of minutes of the peak, *Process Time* is the number of seconds per passenger for the process, and *MQT* is the maximum queue time.

This formula can be rearranged to make 'Demand' the subject of the equation, which gives the capacity for each period based on a given number of processors, process time and MQT, as below:

$$Capacity = ((Period + MQT) \times Unit\ Provision)/(Process\ Time/60)$$

The capacity can then be assessed for different period lengths.

When rearranging the formula, the methodology is simplified to examine only the 60-minute period, as this is the period for which the annual capacity figure is based off.

B.2 ARRIVALS HALL CAPACITY APPROACH

For non-processor-based capacity, like the arrivals hall area, a different methodology is provided by the ADRM, based on populations and available areas. To calculate the passenger holding capacity of the arrivals hall area, the following rearranged formula is used:

$$Hall\ Capacity = 1/((seat\ ratio * seat\ area)/Area\ of\ Hall + ((standing\ ratio * stand\ area)/Area\ of\ hall)$$

Where *seat ratio* is the percentage of people who are seated, and *standing* ratio is the percentage of people who are standing, *seat area* is the area provided per seat, *stand area* is the area provided per standing person, and *area of hall* is the total area of the arrivals hall.

Once the Hall Capacity is known, it is required to work out the peak hour arrivals passengers that this capacity supports:

$$PHP = 1/(((Pax\ Dwell\ /(Hall\ Capacity * 60) + ((Visitor\ Dwell * Visitor\ Ratio)/(Hall\ Capacity\ * 60)))$$

Where *PHP* is the peak hour capacity of the area, *Pax Dwell* and *Visitor Dwell* are the average dwell times of passengers and visitors in the arrivals hall, and *Visitor Ratio* is the average number of visitors per arriving passenger.

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Appendix V: Information to confirm that the EIAR for daa's application is appropriately scoped

Applicant Details

Name: daa plc

Contact: Jane Roche, Head of Planning

Address: Three, the Green, Dublin Airport Central, Dublin Airport, Swords, Dublin, Ireland, K67 X4X5

1. Introduction

This Appendix identifies information relevant to the scope of the environmental assessment and demonstrates how the information provided meets the requirements of sections 7(2) and 12(2) of the Act, having regard to the European Commission's Environmental Impact Assessment of Projects: Guidance on Scoping (2017).

The Appendix follows the structure of the European Commission's scoping checklist and identifies where the relevant information has been provided within the Application Report and supporting documentation.

The Appendix should be read alongside the Application Report and supporting technical documentation. It does not introduce new project information or environmental assessment beyond that presented elsewhere. Rather, it provides a high-level summary of the information relevant to scope the Environmental Assessment. Detailed assessment methodologies, significance criteria, datasets, technical analyses and topic-specific terminology are presented within the relevant environmental topic chapters and supporting technical reports to which this Appendix refers.

Table V-1 identifies where the information requirements prescribed under section 7(2) and 12(2) of the Act are addressed within the Application Document. The table provides a clear cross-reference to the relevant sections of the Application Document and seeks to demonstrate how the information relating to the characteristics of the Proposed Project and its likely environmental effects have been considered.

Table V-1 Information relevant to the scope of the EIAR

Requirements		**Section**
Company	Company Details to be provided	Appendix V: Applicant Details
Contact Details	Details of the Main Contact to be provided	Appendix V: Applicant Details
Characteristics of the project		
Brief description of the proposed Project.		Appendix V – Section 2.1
Reasons for proposing the Project.		Appendix V – Section 2.2
A plan showing the boundary of the development, including any land required temporarily during construction.		Appendix V – Section 2.3

The physical form of the development (layout, buildings, other structures, construction materials, etc.)	Appendix V – Section 2.4
Description of the main processes including size, capacity, throughput, input, and output.	Appendix V – Section 2.5
Any new access arrangements or changes to existing road layout.	Appendix V – Section 2.6
A work programme for construction, operation, and commissioning phases, and restoration and after-use where appropriate.	Appendix V – Section 2.7
Construction methods.	Appendix V – Section 2.8
Resources used in construction and operation (materials, waster, energy, etc.).	Appendix V – Section 2.9
The relationship with other existing/planned Projects.	Appendix V – Section 2.10
Information about the Alternatives that are being considered.	Appendix V – Section 2.11
Information about mitigating measures which are being considered.	Appendix V – Section 2.12
Other activities which may be required as a consequence of the Project (e.g. new roads, extraction of aggregate, provision of new water supply, generation or transmission of power, increased housing and sewage disposal).	Appendix V – Section 2.13
Details of any other permits required for the Project.	Appendix V – Section 2.14
Characteristics of the Potential Impact	
A brief description of the Project's likely impacts considering the following factors: impacts on people, human health, fauna and flora, soils, land use, material assets, water quality and hydrology, air quality, climate, noise and vibration, the landscape and visual environment, historic and cultural heritage resources, and the interactions between them.	Appendix V – Section 4.1 & Chapter 5 (Table 5-3)
Nature of the impacts (i.e. direct, indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative).	Appendix V – Section 4.2 & Chapter 5 (Table 5-3)
Extent of the impact (geographical area, size of the affected population/habitat/species).	Appendix V – Section 4.3 & Chapter 5 (Table 5-3)
Magnitude and complexity of the impact.	Appendix V – Section 4.4 & Chapter 5 (Table 5-3)
Probability of the impact.	Appendix V – Section 4.5 & Chapter 5 (Table 5-3)
Duration, frequency, and reversibility of the impact.	Appendix V – Section 4.6 & Chapter 5 (Table 5-3)
Mitigation incorporated into the Project design to reduce, avoid or offset significant adverse impacts.	Appendix V – Section 4.7 & Chapter 5 (Table 5-3)
Cumulative Effects	Appendix V – Section 4.8 & Chapter 5 (Table 5-3)
Trans-frontier nature of the impact.	Appendix V – Section 4.9 & Chapter 5 (Table 5-3)

2. Characteristics of the Proposed Order

2.1 Brief Description of the Proposed Order

The Proposed Order comprises the amendment of the existing passenger capacity conditions attached to Terminal 1 and Terminal 2 at Dublin Airport, which currently restrict the combined passenger throughput of the terminals to 32 mppa. The Proposed Order relates solely to the amendment of these existing passenger capacity conditions and does not include any physical development, airport infrastructure works or alterations to the layout of Dublin Airport. Airport activity facilitated by the Proposed Order would be accommodated within existing airport infrastructure. The environmental impacts of 40mppa have been assessed. Further details are provided in Chapters 1 and 4 of the Application Report.

2.2 Reasons for the Proposed Order

The Proposed Order is being sought to amend the existing passenger capacity conditions at Dublin Airport to enable future passenger demand up to 40mppa to be accommodated through the operation of the airport's existing infrastructure. Existing passenger capacity conditions would limit passenger throughput to 32mppa, notwithstanding that current passenger throughput already materially exceeds that level and forecast demand is expected to increase further. The Proposed Order is therefore intended to address an existing and operational constraint on airport activity.

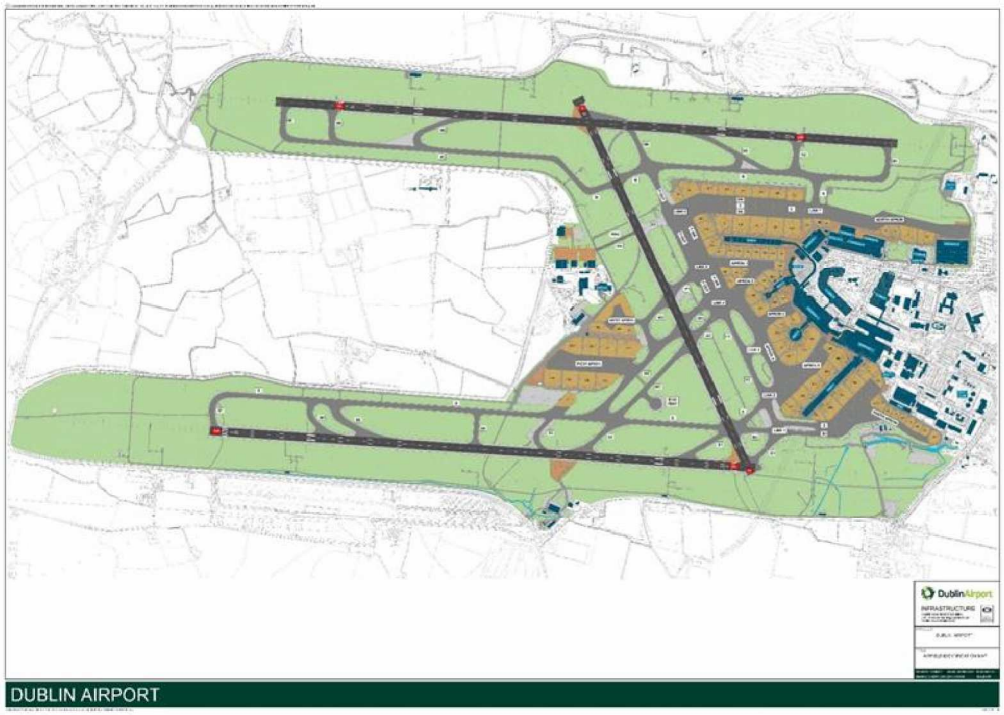
The Proposed Order provides an appropriate statutory mechanism through which the environmental effects of amending the existing passenger capacity conditions can be comprehensively assessed. This includes the preparation of an Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS) and Water Framework Directive (WFD) Assessment to inform the Minister's consideration of the Proposed Order.

The strategic need for the Proposed Order, together with the objectives it seeks to achieve are described in Chapters 3 of the Application Document.

2.3 Site Location and Application Boundary

The Proposed Order relates to Dublin Airport, County Dublin. The Application Boundary is shown in Figure Appendix V.1 below. Whilst the Proposed Order relates to the amendment of the existing passenger capacity conditions, the operational consequences of amending those conditions extend to the entire operation of Dublin Airport as an integrated airport system. Accordingly, the information supporting the Proposed Order considers the airport as a whole, including the existing airside and landside infrastructure used to accommodate passenger activity.

Figure Appendix V.1: Application Boundary



As the Proposed Order does not comprise physical development, no additional land is required temporarily or permanently for construction, construction compounds, access or ancillary works.

The area surrounding Dublin Airport comprises a mix of airport operational lands, agricultural areas, residential communities, recreational uses, and commercial and industrial development. Under the Fingal Development Plan and Dublin Airport Local Area Plan, lands in the vicinity of the airport are zoned for a range of purposes including airport-related development, agriculture, residential use, open space and strategic infrastructure, providing the principal land-use policy framework for the area. Key environmental receptors include nearby residential communities, protected cultural heritage features, local watercourses and drainage catchments, and designated sites, including Baldoyle Bay SAC/SPA and Malahide Estuary SAC/SPA.

2.4 No physical development under the Proposed Order

The Proposed Order does not comprise physical development and does not include the construction, alteration or extension of buildings, runways, taxiways, aprons, roads or other airport infrastructure. Similarly, the Proposed Order does not involve construction materials, engineering works or changes to the physical layout of Dublin Airport.

The Proposed Order relates solely to the amendment of the existing passenger capacity conditions. Airport operations associated with the Proposed Order would continue to utilise the existing airport infrastructure, including the runway system, terminal buildings, aircraft operational areas, landside transport infrastructure and supporting operational facilities.

2.5 Description of the Main Process

The Proposed Order relates to the operation of Dublin Airport using the existing airport infrastructure. As the Proposed Order does not comprise physical development, its principal characteristics are defined by the operational conditions assessed rather than by new buildings or infrastructure. Accordingly, the Application Report defines a common set of operational assumptions that describe the

airport operating conditions associated with the Proposed Order and provide the basis for the supporting environmental assessments.

The principal operational characteristics associated with the Proposed Order comprise:

- Passenger throughput, including the existing permitted (32 mppa), current operations (36.4 mppa), forecast Proposed Order scenario (40 mppa) and Do Nothing scenario (32 mppa), which together provide the operational framework for the supporting environmental information;
- Aircraft activity, including forecast aircraft movements, fleet mix and associated operational characteristics derived from the passenger throughput assumptions;
- Runway operations, including the operational assumptions relating to runway operating hours, the North Runway Relevant Action (NRRA) including North Runway operating hours of 06:00–23:59 and an NQS of 16,260 QC points but without the movement limit which was included in that decision having regard to the decision of the European Commission dated 10 February 2026;
- Surface access demand, including passenger, staff and other airport-related travel associated with the forecast airport activity; and
- Supporting airport operations, including passenger processing, baggage handling, aircraft servicing, airfield operations, security, maintenance and other operational support activities.

Together, these operational characteristics define the airport operations associated with the Proposed Order and have had regard to the existing airport infrastructure, forecast passenger demand and the prevailing operational and regulatory context. Tables 4-1 and 4-2 of the Application Report summarise the principal operational assumptions associated with each operational scenario.

2.6 Access Arrangements

Dublin Airport is framed by a high-capacity road network, and benefits from existing public transport, pedestrian and cycling infrastructure. The Proposed Order does not include any new vehicular or pedestrian access arrangements or alterations to the existing road layout serving Dublin Airport. Similarly, it does not comprise proposals for new public transport infrastructure or changes to the physical transport network.

Notwithstanding this, the Proposed Order has the potential to influence the demand for travel to and from Dublin Airport. Accordingly, the Application Report includes operational assumptions relating to surface access demand associated with the forecast passenger throughput, including passenger, staff and other airport-related journeys by private car, taxi, bus, coach and rail. These assumptions have been developed having regard to the forecast airport activity associated with the Proposed Order and the anticipated operation of the wider transport network, including committed transport infrastructure and services where relevant.

The assessment of transport and surface access associated with the Proposed Order will therefore consider the operational effects arising from changes in travel demand rather than changes to the physical transport infrastructure.

2.7 Work programme for construction, operation, and commissioning phase

The Proposed Order does not comprise physical development and therefore does not include construction, commissioning, restoration or after-use phases. Accordingly, no construction programme is required.

2.8 Construction Methods

The Proposed Order does not comprise physical development and therefore no construction methods are proposed.

2.9 Resources Used in Construction and Operation

As the Proposed Order does not comprise physical development, no construction materials or construction resources are required.

The Proposed Order relates to the continued operation of Dublin Airport using the existing airport infrastructure. Dublin Airport operates on a continuous, year-round basis and facilitates passenger, cargo and aviation activity throughout the calendar year. Airport operations comprise the use of existing runways, taxiways, aprons, terminal facilities, landside transport infrastructure and associated operational support services. The operational characteristics assessed in support of the Proposed Order are described in Chapter 4 of the Application Report, which details how airport operations would continue to utilise operational resources, including electricity, gas, water, telecommunications and other utility services. The assessment undertaken to date indicates the forecast demand for these services remains well below the adopted significance threshold for national resource consumption and that existing utility infrastructure is capable of supporting the forecast operational activity.

2.10 Relationship with Other Existing and Planned Projects

The Proposed Order has been considered in the context of existing approvals, live consent processes and other permitted future developments associated with Dublin Airport to determine whether any form an integral part of, or are functionally or legally interdependent with, the Proposed Order. The principal projects and approvals considered comprise:

- North Runway Relevant Action (NRRA) – It is assumed that, in 2029, the operating parameters for the runway system will reflect the ACP decision on the North Runway Relevant Action, including North Runway operating hours of 06:00–23:59 and an NQS of 16,260 QC points but without the movement limit which was included in that decision having regard to the decision of the European Commission dated 10 February 2026.
- Infrastructure Application (IA) – a live planning application seeking consent for airport infrastructure improvements. The IA is currently under consideration by Fingal County Council (FCC) and has been the subject of a Draft Regulatory Decision (Draft RD) dated 28th May, 2026, issued by the Aircraft Noise Competent Authority (ANCA).
- Airport Drainage Masterplan (DMP) – a strategic programme for future drainage improvements. Individual projects arising from the DMP would be progressed separately, where required. One such project is the Airfield Drainage Project (ADP), which proposes an upgraded drainage network at Dublin Airport, with the decision to grant planning permission by Fingal County Council upheld by An Coimisiún Pleanála on appeal.
- Cargo Relocation Project – a live planning application to relocate the existing cargo operations at Corballis Park to a site at Eastlands. This is a separate airport development proposal progressed independently through its own statutory consent process.
- Other airport development projects – including routine operational, maintenance and asset replacement works, together with other airport improvement projects progressed independently where required.
- Other reasonably foreseeable future developments – including longer-term airport development proposals and third-party infrastructure projects, such as MetroLink, which do not form part of the Proposed Order and either have been, or would be, subject to their own statutory consent and environmental assessment requirements, where applicable.

Having regard to the assessment principles applied, none of these approvals, consent processes or developments forms an integral part of, or is functionally or legally interdependent with, the Proposed Order. Their relationship with the Proposed Order has nevertheless been considered in defining the supporting environmental information and, where relevant, identifying cumulative environmental effects.

Regulatory Relationship and Mitigation

The Proposed Order interacts with the North Runway Relevant Action (NRRA) (ABP Ref: ABP-314485-22 (F20A/0668)). While the NRRA remains subject to separate legal and regulatory processes, it informs assumptions adopted in the environmental assessments supporting the Proposed Order, including the North Runway operating hours, and the use of a noise quota system for the management of nighttime aircraft noise.

The Infrastructure Application (IA) (F23A/0781) seeks permission for 11 airport infrastructure projects (Project Elements) and an amendment of the 32mppa threshold to 40mppa. The IA is currently under consideration by Fingal County Council (FCC) and has been the subject of a Draft Regulatory Decision (Draft RD) dated 28th May, 2026, issued by the Aircraft Noise Competent Authority (ANCA). The IA is likely to require considerable time to progress through FCC, ANCA and, if appealed, ACP processes. The Proposed Order is therefore required to address the passenger capacity conditions through the specific statutory mechanism established by the Act while the IA remains subject to the planning process. A key aspect of the Act is the protection of the IA.

The Proposed Order does not predetermine, replace or prejudice the outcome of either the NRRA process or the IA process.

2.11 Alternatives Considered

The alternatives considered for the Proposed Order reflect its nature as a legislative amendment to the existing passenger capacity conditions at Dublin Airport rather than a proposal for physical development. Accordingly, the alternatives assessment will consider different approaches to the existing passenger capacity conditions, rather than alternative locations, layouts, designs or engineering solutions.

2.12 Mitigation Measures Under Consideration

The supporting environmental information has identified the embedded operational controls, environmental management measures and monitoring arrangements that have been assumed as part of the environmental baseline for the assessment of the Proposed Order. These comprise existing operational and regulatory controls applicable at Dublin Airport.

For the majority of environmental topics considered to date, no additional mitigation measures are currently identified as being necessary because the assessment indicates that the Proposed Order is not expected to give rise to likely significant adverse environmental effects. Where potentially significant environmental effects have been identified, appropriate mitigation, monitoring and management measures have been identified or are being developed as part of the ongoing environmental assessments.

A summary of the current mitigation, monitoring and environmental management measures under consideration for each environmental topic is provided in Table Appendix 5-3 in this appendix.

2.13 Other Consequential Activities

The Proposed Order does not comprise physical development and does not require consequential development such as new roads, mineral extraction, new water supply infrastructure, electricity generation or transmission infrastructure, housing development or sewage treatment works. The Proposed Order relates solely to the amendment of the existing passenger capacity conditions.

Any future physical development that may be required independently of the Proposed Order would be subject to separate planning, regulatory and environmental assessment processes, as appropriate.

2.14 Other Consents and Approvals

The Proposed Order is sought under the provisions of the Dublin Airport (Passenger Capacity) Act, 2026.

The operation of Dublin Airport remains subject to a range of separate statutory, regulatory and environmental control regimes, including planning permissions, environmental licences and permits, aviation regulatory requirements and other statutory approvals, as applicable. These existing controls will continue to apply independently of the Proposed Order.

Where future physical development or infrastructure works are proposed separately from the Proposed Order, any necessary planning permissions, environmental consents, licences or other statutory approvals will be sought through the relevant legislative and regulatory processes.

3. Approach to the EIAR

3.1 Provisional Scope of the EIAR

The EIAR will assess the likely significant environmental effects of the Proposed Order in accordance with the Act, the EPA Guidelines on the Information to be Contained in Environmental Impact Assessment Reports and other relevant topic-specific guidance. The assessment will address each environmental topic proportionately, having regard to the characteristics of the Proposed Order, the receiving environment and the potential for likely significant environmental effects. The scope, assessment methodologies, baseline data requirements, assessment scenarios and significance criteria are described within the relevant chapters of the EIAR.

3.2 Indicative Programme

Preparation of the EIAR is well advanced and is being undertaken in parallel with the Natura Impact Statement and Water Framework Directive Assessment. The remaining programme comprises completion of technical assessments, quality assurance and document integration prior to submission of the completed environmental assessment documents in accordance with the statutory process. The final EIAR is anticipated to comprise approximately 25 technical chapters together with supporting appendices.

3.3 Environmental Assessment Team

The environmental assessments are being prepared by a multidisciplinary team of suitably qualified and experienced environmental practitioners and technical specialists covering the relevant environmental disciplines. Overall coordination of the EIAR is being undertaken by experienced Environmental Impact Assessment practitioners. The final EIAR will identify the authors responsible for each technical chapter together with their relevant qualifications and experience.

4. Characteristics of the Potential Impact

4.1 Likely Impacts

The likely environmental impacts of the Proposed Order have been identified having regard to the operational characteristics of the Proposed Order, the receiving environment, the environmental pathways through which effects may arise and the requirements of the Act and relevant published guidance. The supporting environmental information has been prepared by specialist environmental consultants using recognised topic-specific assessment methodologies, common operational assumptions and a consistent assessment framework to provide a robust and proportionate basis for

identifying, describing and assessing the likely significant environmental impacts of the Proposed Order. Topic-specific methodologies and significance criteria have been selected having regard to the characteristics of the environmental factor being assessed and relevant published guidance.

The environmental assessments have considered the environmental factors identified by the EIA Directive, namely population and human health, biodiversity (including flora and fauna), land, soils and geology, water, air quality, climate, noise and vibration, landscape and visual amenity, cultural heritage, material assets and the interactions between these environmental factors.

A summary of the current assessment position for each environmental topic, including the principal environmental pathways, assessment approach, current findings and mitigation measures under consideration, is provided in Table 5-3 in this Application Letter.

4.2 Nature of the Impacts

The supporting environmental assessments consider the nature of the likely environmental impacts associated with the Proposed Order, including direct, indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects, as appropriate to each environmental topic and having regard to established assessment methodologies and relevant guidance.

The nature of the likely environmental effects identified for each environmental topic is summarised in in Table 5-3 in this Application Letter.

4.3 Extent of the Impacts

The supporting environmental assessments identify the geographical extent of the likely environmental impacts associated with the Proposed Order, having regard to the environmental pathways through which effects may occur and the characteristics of the receiving environment. The spatial extent of assessment varies by environmental topic and reflects the nature of the potential effect, the relevant receptors and recognised assessment methodologies.

The extent of the likely environmental effects identified for each environmental topic is summarised in Table 5-3 in this Application Letter.

4.4 Magnitude and Complexity of the Impacts

The magnitude and complexity of the likely environmental impacts have been assessed using recognised topic-specific assessment methodologies appropriate to each environmental factor. The assessment has considered the scale of potential change arising from the Proposed Order together with the sensitivity or importance of the receiving environment, where relevant.

The current assessment findings relating to the magnitude and complexity of likely environmental impacts are summarised in Table 5-3 in this Application Letter.

4.5 Probability of the Impact

The supporting environmental assessments have considered the likelihood of environmental impacts occurring, having regard to the operational characteristics of the Proposed Order, the environmental pathways through which effects may arise and the available environmental information. Where uncertainty exists, a precautionary approach has been adopted in defining the scope of the assessments.

The current understanding of the probability of the likely environmental effects is summarised in Table 5-3 in this Application Letter.

4.6 Duration, Frequency and Reversibility of the Impacts

The supporting environmental assessments consider, where relevant, the duration, frequency and reversibility of the likely environmental impacts associated with the Proposed Order. These impacts have been assessed in accordance with recognised topic-specific methodologies and reflect the operational nature of the Proposed Order.

The current assessment findings relating to the duration, frequency and reversibility of the likely environmental impacts are summarised in Table 5-3 in this Application Letter.

4.7 Mitigation Measures

Embedded operational controls, existing environmental management measures, regulatory controls and any additional mitigation or monitoring measures identified through the ongoing environmental assessments have been taken into account in the supporting environmental information.

For the majority of environmental topics assessed to date, no additional mitigation measures are currently identified as being necessary because the assessment indicates that the Proposed Order is not expected to give rise to likely significant adverse environmental effects.

The current position in respect of mitigation, monitoring and environmental management measures is summarised in Table 5-3 in this Application Letter.

4.8 Cumulative Effects

The potential for cumulative environmental effects has been considered as part of the supporting environmental assessments. This includes consideration of:

- the potential for in-combination effects arising where multiple environmental pathways may affect the same environmental receptors; and
- the potential for cumulative effects arising from the Proposed Order in combination with other existing, permitted and, where relevant, reasonably foreseeable developments.

Based on the work completed to date, no likely significant cumulative environmental effects have been identified beyond those reported within the individual environmental topic assessments. This position will be confirmed through the completion of the environmental assessments. The current position is summarised in Table 5-3 in this Application Letter.

4.9 Transboundary Impacts

The potential for transboundary environmental impacts has been considered as part of the supporting environmental assessments, having regard to the operational characteristics of the Proposed Order and the nature of the environmental pathways through which effects may occur.

Based on the work completed to date, no likely significant transboundary environmental impacts have been identified. This position will be confirmed through the completion of the environmental assessments. The current position is summarised in Table 5-3 in this Application Letter.

Appendix VI: Commission Decision (EU) 2026/836 of 10 February 2026 on the Process for Introducing Operating Restrictions at Dublin Airport in Accordance with Regulation (EU) No 598/2014

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COMMISSION DECISION (EU) 2026/836

of 10 February 2026

on the process for introducing operating restrictions at Dublin Airport in accordance with Regulation (EU) No 598/2014 of the European Parliament and of the Council

(notified under document C(2026) 919)

(Only the English text is authentic)

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) No 598/2014 of the European Parliament and of the Council of 16 April 2014 on the establishment of rules and procedures with regard to the introduction of noise-related operating restrictions at Union airports within a Balanced Approach and repealing Directive 2002/30/EC [1] (the 'Regulation (EU) No 598/2014'), and in particular Article 8(3) thereof,

Whereas:

(1) On 8 August 2025, in accordance with Article 8(1) of Regulation (EU) No 598/2014, Ireland notified the Commission of its intention to introduce operating restrictions at Dublin Airport registered with the reference Ares(2025)6514967. The submitted documents included references to, among other, a regulatory decision issued by the Aircraft Noise Competent Authority ('ANCA') following a study on proposed operating restrictions to be introduced at Dublin Airport, Inspector's reports informing the decision of following a number of appeals to ANCA's Regulatory Decision, and the Planning Commissioner's Final Decision.

(2) Following the analysis of the submitted documents, the Commission posed a number of questions to the Irish Authorities by letter of 31 October 2025 registered with the reference Ares(2025)9354715. The replies by the Irish authorities were received on 8 December 2025 registered with the reference Ares(2025)10814577.

(3) The Commission assessed the submissions of the Irish authorities under Regulation (EU) No 598/2014, in particular with respect to the applicable procedure, the objectives of the measure and the proportionality of the proposed operating restrictions.

(4) The Noise Abatement Objective as set in the Noise Action Plan for Dublin Airport seeks to 'limit and reduce the long-term adverse effects of aircraft noise on health and quality of life, particularly at night, as part of the sustainable development of Dublin Airport'. It will be primarily measured through the number of people highly annoyed and highly sleep disturbed by aircraft noise, particularly at night. The objective also requires a reduction in the number of people exposed to aircraft noise above 55 dB L_{night} and 65 dB L_{den} when compared to conditions in 2019.

(5) ANCA, following its assessment, determined that to achieve the objective the following measures are necessary, which was reflected in its Regulatory Decision published on 20 June 2022:

— A Noise Quota Scheme with an annual quota count budget of 16 260 between 23:00 and 06:59 (operating restriction);

— The North Runway shall not be used for take-off or landing between 00:00 and 05:59 except in certain circumstances (e.g. safety, maintenance considerations, exceptional air traffic conditions etc.) (operating restriction);

— A voluntary residential sound insulation grant scheme for residential dwellings (land-use planning measure).

[1] OJ L 173, 12.6.2014, p. 65, ELI: http://data.europa.eu/eli/reg/2014/598/oj.

(6) Following appeals to ANCA's Regulatory Decision lodged to An Comisiún Pleanála ('ACP'), the appeal body for the purpose of Article 4(1) of Regulation (EU) No 598/2014, relying on the reasoning expressed in Inspector's reports, ACP acknowledges that the noise abatement objective set by ANCA can be achieved by the measures included in ANCA's Regulatory Decision. However, ACP considers that measurements in L_{night} and L_{den} do not sufficiently consider the impact of the proposed measures on additional take-offs and landings during the night leading to additional awakenings at night. ACP thus introduces a supplementary noise metric, $LA_{max,}$ to take into account the additional awakenings and concludes that an additional operating restriction, namely an annual night movement cap of 35 672 is necessary.

(7) In its letter of 31 October 2025 ([2]), the Commission asked whether ACP had considered any alternative less restrictive measures to achieve the noise abatement objective containing the supplementary noise metric. By letter of 8 December 2025, ACP replied that the only measures taken into account were those proposed by the Dublin airport authority in its planning application (a noise quota system, restrictions for the use of the North Runaway between 00:00 and 05:59 and a Night-Time Residential Sound Insulation Grant Scheme) and which had already been considered by ANCA in its assessment.

(8) Pursuant to Article 5(2)(a) of Regulation (EU) No 598/2014, Member States are to define the noise abatement of the specific airport, taking account of the Noise Action Plan as appropriate. Article 8 and Annex V of Directive 2002/49/EC of the European Parliament and of the Council ([3]) read together with Articles 5 and 6 of Directive 2002/49/EC and Annex I of Regulation (EU) No 598/2014 require that the assessment methods for the noise indicators include, as a minimum, health effects determined through L_{den} and L_{night} indicators, detailed in Annex II and Annex III of Directive 2002/49/EC. Annex I of Regulation (EU) No 598/2014 read together with Directive 2002/49/EC also allows the use of additional indicators which have an objective basis, such as LA_{max}.

(9) Pursuant to Article 5(3)(d) of Regulation (EU) No 598/2014, Member States are not to apply operating restrictions before considering other measures of the balanced approach This is in view to determine the most cost-effective measure or a combination of measures.

(10) ACP concluded that the annual night movement cap, which constitutes an operating restriction, is necessary to achieve the noise abatement objective considering the LA_{max} 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) No 598/2014.

(11) The Commission, therefore, is of the opinion that the process for introducing operating restrictions at Dublin Airport by the Irish authorities is not in conformity with Regulation (EU) No 598/2014 and that the relevant Irish authorities should examine this Decision and inform the Commission of their intentions before introducing the operating restrictions.

(12) For the avoidance of doubt, this Decision is without prejudice to any future Commission's assessment of the obligation of the Irish Authorities to fully comply with the provisions of Regulation (EU) No 598/2014.

HAS ADOPTED THIS DECISION:

Article 1

1. The operating restrictions at Dublin Airport, which Ireland intends to introduce and which it notified on 8 August 2025, do not fully follow the process set out in Regulation (EU) No 598/2014, insofar as Ireland has not considered other measures than operating restrictions in accordance with Article 5(3) of that Regulation.

([2]) Ares(2025)9354715.

([3]) Directive 2002/49/EC of the European Parliament and of the Council of 25 June 2002 relating to the assessment and management of environmental noise (OJ L 189, 18.7.2002, p. 12, ELI: http://data.europa.eu/eli/dir/2002/49/oj).

2. Ireland shall examine this Decision and inform the Commission of their intentions before introducing those operating restrictions at Dublin Airport.

Article 2

This Decision is addressed to the Republic of Ireland.

Done at Brussels, 10 February 2026.

For the Commission
Apostolos TZITZIKOSTAS
Member of the Commission