Appendix 1-3: Ministerial Communications

An Roinn Iompair
Department of Transport

11 September 2026

Mr. Nick Cole
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Application under section 7(1) of the
Dublin Airport (Passenger Capacity) Act 2026

Dear Nick,

I refer to your application made pursuant to section 7(1) of the Dublin Airport (Passenger Capacity) Act 2026 (Act of 2026) dated 05 August 2026, for the making of an Order under section 25(1) of the Act of 2026 to amend the existing passenger capacity constraints that currently limit the combined passenger capacity of Terminal 1 and Terminal 2 at Dublin Airport to 32 million passengers per annum.

Pursuant to section 7(5)(a) of the Act of 2026, please see attached notice which states my intention, subject to the outcome of the relevant environmental assessments, to accept your proposal to amend the existing passenger capacity conditions by increasing the limit from 32 million passengers per annum to 40 million passengers per annum and to make an Order to that effect.

Before I may make an Order under the Act of 2026, I must apply to an Coimisiún Pleanála (the Commission) for the carrying out of an Environmental Impact Assessment and Appropriate Assessment. However, in advance of that, it is my intention to request a scoping opinion from the Commission in accordance with section 12(1) of the Act of 2026. Under section 12(3) of the Act of 2026, the Commission is required to consult with various bodies in considering a request for a scoping opinion, including daa. I ask that you fully engage in that process with the Commission.

Once I have received the scoping opinion from the Commission, it is my intention to issue a direction to you under section 6(1) of the Act of 2026 to provide me with a Natura Impact Statement and an Environmental Impact Assessment Report prepared in accordance with the scoping opinion provided by the Commission. I will immediately apply to the Commission for the carrying out of the environmental assessments once I have received those documents from you.

As soon as the Commission has carried out the relevant environmental assessments, and issued its reasoned conclusion and determination to me, I will consider the outcome of those assessments and make a final decision on the making of an Order under section 25(1) of the Act of 2026.

My officials are available should you need any further information or clarification.

Yours sincerely,



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Darragh O'Brien TD

Minister for Transport

Notice under section 7(5)(a)
of the Dublin Airport (Passenger Capacity) Act 2026

1. I, Darragh O'Brien TD, Minister for Transport, hereby issue this Notice to daa public limited company pursuant to section 7(5)(a) of the Dublin Airport (Passenger Capacity) Act 2026 (Act of 2026) stating my intention to accept the proposal of daa set out in its application made pursuant to section 7(1) of the Act of 2026 dated 5 August 2026. Subject to the outcome of the environmental impact assessment and appropriate assessment to be undertaken under sections 15 and 21 of the Act of 2026 by An Coimisiún Pleanála (the Commission), it is my intention to make an Order in accordance with section 25(1) of the Act of 2026, to amend the existing passenger capacity conditions[1] by increasing the limit from 32 million passengers per annum (mppa) to 40 million passengers per annum (mppa) and for such an amendment to apply to Dublin Airport as a whole as proposed by daa.

2. In making this Notice, I have had regard to daa's application dated 5 August 2026, the criteria referred to in paragraphs (a) to (c) of section 25(1) of the Act of 2026, the views received from consultations undertaken pursuant to section 7(3) of the Act of 2026, the policy frameworks referenced in section 25(2) of the Act of 2026, my applicable obligations under the Climate Action and Low Carbon Development Act 2015, and the impact on local communities. I expand on each of these matters below.

daa's application

3. daa has applied for the making of a Ministerial Order to amend the passenger cap planning condition and increase the permitted passenger numbers from 32mppa to 40mppa. daa states that work has commenced on environmental assessments to support the making of an Order, and that its application along with those assessments are prepared by reference to an operational scenario of 40mppa.

4. daa goes into detail around the background to the existing capacity constraints, the significant developments at the airport over the last 20 years and the evolving regulatory framework. It notes that the North Runway Relevant Action (NRRA), which considers the night-time operations at

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

Dublin Airport including hours of operation for the North Runway and use of a noise quota scheme, is of particular relevance as it informs the assumptions used in the environmental assessments.

5. daa highlights several recent planning decisions and development proposals which illustrate the continuing evolution of the airport campus, including the underpass of the runway, airfield drainage project, Customs and Border Protection facility, Solar PV and belly hold cargo relocation. daa points to the relevance of these projects to the making of an Order as it forms part of the existing and evolving airport baseline and informs operational assumptions.

6. daa notes the urgency for the making of an Order as it is not premised on future demand alone. Rather, it also responds to existing passenger throughput above 32mppa, the faster than expected recovery following Covid-19, forecast demand in the short term, and the practical timing requirements of airline scheduling and slot coordination. daa states that the urgency is heightened by ongoing enforcement, court and regulatory processes concerning the existing passenger cap planning condition and its interaction with the slot-coordination regime.

7. daa states its expectation that the ruling of the Court of Justice of the European Union (CJEU) is likely to align with the opinion of the Advocate General. In the event that this is the case, and in the event that the Irish High Court makes an order removing the stay that is currently in place, the Irish Aviation Authority (IAA) would be required to take the passenger cap planning condition into account as a relevant constraint for the purpose of the EU Slot Regulation.

8. daa contends that in the event that the IAA does have to take account of the passenger cap planning condition as a relevant constraint under the EU Slot Regulation, 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.

9. It is daa's view that 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 4mppa over a very short period. 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 Airport, resulting in reduced connectivity and lost opportunities for the wider economy.

daa's views on consequences of inaction

10. daa refers to the criteria to be considered under section 25(1) of the Act of 2026 in relation to the harm caused to the economy, international connectivity and the State's international reputation regarding air transport, in the event that the existing passenger cap planning condition is maintained.

11. In particular, daa makes the following points in relation to the economy:

- Published economic analysis estimates that maintaining the cap could result in approximately 17,800 forgone jobs and €1.5 billion in forgone Gross Value Added (GVA) by 2030;

- 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;

- More than 4.1 million overseas tourists were welcomed to Dublin in 2024 who generated €2.4 billion in tourism revenue;

- Dublin Airport is estimated to support around 116,110 jobs and €9.6 billion in GVA;

- International evidence suggests that capacity constrained airports can contribute to higher air fares and reduced competition.

12. In relation to international connectivity, daa highlights the following:

- 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;

- In the event that 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;

- Reduced connectivity may 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;

- Constraints on hub development may reduce the viability of new and existing services and weaken Ireland's overall connectivity offering, particularly in relation to transatlantic markets;

- 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;

- At Appendix III of its application, daa sets out a detailed economic case for the making of an Order. This analysis references the 2023 InterVISTAS Economic Impact Study which contains modelled estimates on the impact of maintaining the 32 million passenger cap (approximately 17,800 forgone jobs and €1.5 billion in forgone Gross Added Value (GVA) by 2030). It also references the European Commission's Aviation Strategy for Europe which 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;

- daa further references SEO Amsterdam, an independent economic research institute, which 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;

- Implications for tourism, trade and foreign direct investment are also highlighted. daa notes that Tourism Ireland's target of more than €10 billion in annual overseas visitor spend by 2031, and IDA Ireland's targets for investment, RD&I and employment, both depend in part on reliable international access given Ireland's island geography;

- Finally, it is highlighted that capacity uncertainty risks pushing airline investment elsewhere, with strategic long-haul decisions particularly difficult to reverse once made.

13. With regard to the State's international reputation in respect of air transport, daa notes the following:

- Continued uncertainty regarding the operation and future capacity of Dublin Airport, coupled with prolonged enforcement, litigation and regulatory processes may undermine confidence in the predictability and effectiveness of the State's planning framework, particularly in relation to critical infrastructure of national importance;

- 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 in the UK or Europe;

- 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;

- Continued uncertainty may affect perceptions of Ireland's capacity to support strategic objectives and maintain and enhance its position within international aviation networks.

National, Regional, Local and Sectoral Policy Frameworks

14. It is noted that daa highlights specific provisions in various national, regional, local and sectoral policy frameworks in support of its application. These include:

- National Planning Framework (NSO 4)
- Regional Spatial and Economic Strategy for the Eastern and Midland Region RPO 8.17
- National Aviation Policy
- Programme for Government
- Fingal Development Plan 2023-2029 (DA 01)
- Dublin Airport Local Area Plan 2020 (ED 01 & ED 03)

Technical Capacity

15. Consultants (Ricondo & Associates) were engaged by daa to establish the current capacity of the existing facilities and infrastructure at Dublin Airport. The capacity assessment is a partial update to the previously completed baseline capacity assessment included in the Capacity Assessment Report for daa's Infrastructure Application.

16. 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. 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. The technical capacity information is to be used to inform the Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) by providing a factual and operational basis for the assessed level and distribution of passenger activity, aircraft activity, surface access demand and airport operations.

17. The capacity assessment notes the 2023 assessment used the baseline capacity assessment and a separate assessment for future capacity, whereas the 2026 assessment looks at existing capacity only. It considers changes that have been implemented in relation to equipment, technology and process movements (e.g. new cabin baggage screening) and the different passenger demand profile (e.g. increase in average numbers of seats per aircraft and load factors).

18. The capacity assessment concludes the estimated capacity of existing facilities is 40.5mppa and does not include proposed future improvements in daa's Infrastructure Application. It is noted that while the Terminal 1 and Terminal 2 could accommodate 43mppa, aircraft boarding gates are the capacity limiting function and therefore estimated capacity lies at 40.5mppa.

19. daa indicates that a detailed Traffic and Transport Assessment has been undertaken which concludes that the transport impacts associated with the making of an Order can be accommodated through the existing and committed transport network and meet the Key Performance Indicators agreed with relevant stakeholders in the airports established Surface Access Monitoring Framework. While this assessment has not been provided with the application, a summary of the environmental impacts sets out the assessment methodology and findings for this area.

Environmental Assessment Scenarios

20. For the purposes of the environmental assessments, it is noted that daa has developed four schedules to provide a basis for assessing the likely significant environmental effects of the proposed Order as follows:

- **Schedule 1 - Existing Permitted Capacity (2023 baseline):** This schedule reflects the existing 32m passenger cap planning condition and uses operational data from a busy day in 2023.

- **Schedule 2 - Current State of the Environment (2025):** This schedule reflects the operational conditions at Dublin Airport in 2025 and is based on the actual flight schedule from 2025 where the airport operated at 36.4 million passengers.

- **Schedule 3 - Future State of the Environment with Proposed Order (2029):** This schedule represents a future scenario where an Order is in place, and the airport is operating with 40mppa, is implementing the Noise Quota Scheme and the North Runway is open between the hours of 6am and midnight in line with a decision on the North Runway Relevant Action.

- **Schedule 4 - Future State of the Environment without Proposed Order (2029):** This schedule represents a future scenario where no Order is made, and the airport is operating with 32m passengers and implementing the Noise Quota Scheme and the North Runway is open between the hours of 6am and midnight in line with a decision on the North Runway Relevant Action.

21. daa notes that the assumptions are considered to represent the most realistic and supportable basis currently available for the assessment and 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 and applies the noise quota scheme as set out in the Commission's decision on the NRRA. It does not include the aircraft movement cap from that decision having regard to the decision of the European Commission from February 2026.

Environmental Assessments

22. daa notes that the assessments it is undertaking to support the making of an Order include detailed baseline studies, technical modelling, impact assessment and the identification of likely significant environmental effects across the relevant environmental topics. While any 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, daa notes that 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.

23. daa's assessment framework provides for a principal assessment and three supporting assessments. The principal assessment compares the scenario at schedule 3 above operating at 40mppa with a noise quota scheme and the North Runway open from 6am to midnight against the scenario at schedule 4 with the same assumed operating conditions but maintaining the 32m passenger cap. This principal assessment is essentially, assessing the effects of making an Order (i.e., the airport operating with 40mppa) as against no Order being made to amend the passenger cap (i.e. the airport operating with 32mppa). The supporting assessments compare operating with an Order under schedule 3 against the 2023 baseline at schedule 1 and against 2025 operations



set out in schedule 2. Finally, the other supporting assessment compares 2025 schedule 2 assessment to 2023 schedule 1 assessment for operational context.

24. daa notes that the supporting assessments are supplementary to the principal assessment and are included to assist in interpreting the assessment findings or where they are required to address topic-specific legislative or technical requirements.

25. daa gives an overview of the environmental assessment topics it has considered under the EIAR and the current assessment position. 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 identified.

26. daa concludes that based on the environmental assessments undertaken to date, no likely significant adverse residual environmental effects have been identified.

27. In terms of the Water Framework Directive, daa states that it is not expected that an Order as proposed would cause deterioration in the status of any surface water or groundwater body or prevent the achievement of the objectives of the Water Framework Directive, having regard to existing and proposed drainage infrastructure, pollution control measures and operational water management measures.

28. daa notes that the NIS provides the information required to inform the Appropriate Assessment of the proposed Order under the Habitats Directive. It identifies the relevant European sites, their qualifying interests and conservation objectives and assesses the operational pathways through which effects could arise. 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 would not adversely affect the integrity of any European site, either alone or in combination with other plans or projects.

29. While daa notes that the assessments to date do not indicate that the making of an Order will have a negative impact on the environment, it is important to highlight that final conclusions remain subject to completion of the environmental assessments and to any further information, consultation or assessment required.

Consideration of daa's application

30. I note that daa has sought an increase in the passenger cap planning condition to 40mppa which is in line with its Infrastructure Application and that the assessments to support its application have



been prepared by reference to an operational scenario of 40mppa. I further note, and agree with, daa's views on the likely consequences of not making an Order to address the passenger cap. I acknowledge that significant work has been done to provide an updated capacity assessment to illustrate that an increase in passenger numbers to 40mppa can be accommodated within the existing infrastructure.

31. In relation to the assumptions used by daa for the environmental assessments, it is my view that it is reasonable to consider a decision on the NRRA without the aircraft movement cap given the decision by the EU Commission in February this year. I note that this results in the assessments being based on a worst-case scenario from an environmental perspective, but in my view, this should ensure that any measures proposed to address the environmental impacts arising from the making of a proposed Order are entirely sufficient and result in a better outcome for local communities.

32. I further note that in setting out its summary of the environmental assessment topics considered, daa has provided information on its findings to date on the likely significant environmental effects of the proposed Order, and the mitigation, monitoring or control measures identified. I acknowledge that the assessments to date do not indicate that the making of an Order will have a negative impact on the environment, which in my view supports the issuing of a Notice of intention to make an Order. However, the environmental impacts must be independently assessed by the Commission, and I will take the outcome of those assessments into account before making a final decision on the making of an Order.

Consideration of the Potential for Serious Harm Referred to in Section 25(1) of the Act of 2026

33. As provided for under section 25(1) of the Act of 2026, I have considered the harm that the existing passenger capacity constraints imposed by way of the 32 million passenger cap planning condition may be causing in relation to the economy of the State, international connectivity and the State's reputation in respect of air transport.

(a) The economy of the State

34. Firstly, I note that in the absence of making an Order under the Act of 2026, not only would future growth be prevented, but it would also immediately result in a cut of over 4mppa where the passenger cap planning condition of 32mppa was maintained.

35. This would have an immediate effect on local employment both directly and indirectly and impact on international connectivity with a need for airlines to cut routes to adhere to the planning condition.

36. In an independent study undertaken by InterVISTAS in 2023 on behalf of daa, it is noted that Dublin Airport provides for over 19,900 direct jobs which equates to over 17,800 full-time equivalents. Adding in indirect and induced employment, the total employment supported by activities at Dublin Airport is estimated to be 44,900 jobs (or 39,900 full-time equivalents), earning a total of €2.0 billion and generating €3.9 billion in Gross Value Added (GVA).

37. In an unconstrained environment, the study forecasts that the economic impact of Dublin Airport is projected to reach 151,000 jobs and €12.5 billion in GVA by 2030 and 191,600 jobs and €15.8 billion in GVA by 2055.

38. That study further provides that maintaining the passenger cap at 32mppa will result in a large proportion of demand being unfulfilled which will also result in less employment and economic activity at the airport and in the downstream industries supporting the airport, as there will be fewer flights and passengers to service. The study estimates that in maintaining the 32 million passenger cap, the Irish economy will forgo 17,800 jobs and €1.5 billion in GVA by 2030, increasing to 53,300 jobs and €4.4 billion in GVA by 2055.

39. I note in its submission to the Oireachtas Joint Committee as part of the pre-legislative scrutiny process, Aer Lingus commissioned an economic assessment report by Jim Power Economics, which concludes that the passenger cap is already acting as a binding constraint on economic activity and that its continuation undermines route development and airline investment, constrained capacity, lost tourism revenue and foregone economic output, and damage to Ireland's international competitiveness relative to peer economies. In quantitative terms, the report illustrates the impact on a small open island economy with a strong dependence on tourism and Foreign Direct Investment, of a failure to quickly resolve the planning issues. The measurable impacts are that for every 1 million passengers not allowed to arrive at Dublin Airport every year that €1.4 billion would be lost to the economy in direct, indirect and induced expenditure and €322.1 million would be lost to the Exchequer in tax revenues forgone; this would also translate to up to 37,000 in direct, indirect and induced jobs that would be lost.

40. Local community groups also made contributions on this matter before the Oireachtas Joint Committee during discussion on pre-legislative scrutiny and highlighted that *"CSO figures tell us that inbound tourism in 2023 accounted for €7.3 billion and 6.9 million visitors, while outbound tourism*

accounted for €12.9 billion and 12 million trips, leaving a net tourism deficit of €5.6 billion. If we apply this to Dublin Airport at 85%, we find that Dublin Airport is responsible for sending €4.76 billion more revenue out of the country than it is bringing in." Wider consideration of this matter must also be factored into my consideration.

41. It is clear from the two separate independent assessments referenced above that maintaining the 32m passenger cap planning condition would have a negative impact on the economy. My officials have already commenced preliminary work on the preparation of a new National Aviation Policy, and I expect to have an issues paper published for consultation before the end of the year. I believe that looking at the aviation sector as a whole and finding innovative ways to encourage the sector to enhance Ireland's strategic connectivity, foster the growth of aviation enterprise and maximise the contribution of aviation to Ireland's sustainable economic growth and development, can also effectively contribute towards addressing the issue of the net tourism deficit which has been raised by local community groups in a scenario where increased connectivity facilitates increased levels of outbound tourism.

(b) International connectivity

42. In terms of impacts on international connectivity, the study finds that the range of destinations connected to Ireland will be capped, impacting on business and tourism where the passenger cap is maintained. This would ultimately constrain the ability of airlines to add frequencies and new routes in line with underlying demand. While airlines may make some adjustments to services to focus on the most high-value services, connectivity will be largely frozen. This means that the possibility of adding new direct routes to new source markets from which Ireland can attract tourists and develop trade and investment will be constrained.

43. I have also considered the Government's Action Plan on Market Diversification 2025, which emphasises that enhancing direct air connectivity (particularly from Asia, South America, and key US gateways) and growing direct air connectivity to the regions, are recognised as critical enablers for both tourism and trade. In view of the rapidly evolving global trade landscape, it is important to ensure that Ireland is connected to as many global markets as possible, and to seek to ensure and improve the competitiveness of our economy. It is crucial that the State can attract international airlines for strategic connectivity to new long-haul destinations. It is my view that this would be extremely difficult to achieve if the 32 million passenger cap planning condition is maintained.

(c) The international reputation of the State in respect of air transport

44. Ireland's aerospace, aviation and space sectors make a significant contribution to the economy, with a combined value of approximately €4.6 billion, including €2.2 billion from aviation, €1.5 billion from aerospace and aviation supply chain activities, and a further €0.9 billion in associated spend. The sector comprises approximately 250 companies, including 130 Enterprise Ireland-supported businesses, and supports around 44,000 full-time jobs.

45. Ireland also remains a global leader in aircraft leasing, with 14 of the world's top 15 aircraft lessors headquartered in Ireland. Irish-based lessors manage aircraft assets valued at approximately €270 billion, representing 69% of the global leased fleet, around 9,500 aircraft, alongside a significant future order book of more than 2,300 aircraft.

46. Ireland has a stellar reputation in the field of aviation and has established itself as a globally recognised centre of excellence in MRO and aviation services; advanced aerospace manufacturing and aircraft leasing, with a growing reputation for innovation across emerging technologies including drones, advanced air mobility and the space sector. It is my belief that maintaining the 32 million passenger cap planning condition and the negative media attention it invites potentially damages that reputation.

47. While not a driver for the legislation, I have also had to consider the formal complaint made to the US Department of Transportation (DoT) by Airlines for America and the fact that among the remedies A4A has requested the US DoT to take, is that the authority held by the air carriers of Ireland to provide international air transportation to the US be curtailed or suspended, or be subject to other countervailing measures as the US DoT finds to be in the public interest I have clearly stated the view that Ireland has not breached its obligations under the EU-US Air Transport Agreement. However, I believe it would be naïve to consider that the complaint has not caused damage to the State's reputation in relation to air transport, given the international attention it has garnered.

National Policies

48. In line with Section 25(2) of the Act, I have identified matters that demonstrate how the proposed amendment to the passenger cap is supported by the wider planning, aviation, economic and infrastructure policy framework.

(a) The National Planning Framework and (b) the National Development Plan

The National Planning Framework (NPF) is the Government's high level strategic plan for shaping the future growth and development of our country out to 2040. The National Planning Framework and the National Development Plan published together in 2018 continue to align and form a single vision for Ireland under Project Ireland 2040. The proposed amendment supports the implementation of the NPF, and the NPF First Revision published in 2025 including National Strategic Outcome (NSO 4) of securing high quality 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 Airport.

(c) Fingal Development Plan (2023-2029)

The proposed amendment is aligned with the recognition of Dublin Airport as nationally significant infrastructure, a primary economic hub for Fingal and a key driver for trade, tourism and 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 acknowledged that passenger numbers at Dublin Airport are forecasted to reach 40 million passengers per annum.

(d) Dublin Airport Local Area Plan (LAP) (2020, as extended)

The proposed amendment is consistent with objectives ED01 and ED03 of the LAP which seeks to protect the core operational function of Dublin Airport as the country'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 passengers per annum by 2030.

(e) The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region (2019)

The proposed amendment is consistent with the RSES including Regional Policy Objective (RPO) 8.17 which supports 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.

(f) National Aviation Policy (NAP) 2015

The proposed 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 considers the growth in air traffic numbers as being critical for the development of Irish society and the Irish economy. The NAP also considers that it is essential that Dublin Airport utilises the full potential of the US customs and border pre-clearance facility.

Consultations

49. In line with section 7(3) of the Act of 2026, I used the provision available to me to consult with the Minister for Housing, Local Government and Heritage in his role as the Minister for Heritage with the National Parks and Wildlife Service under his remit, Fingal County Council, the Commission, the Irish Aviation Authority, the National Transport Authority and Transport Infrastructure Ireland. I have given due consideration to the responses to those consultations.

50. I would like to draw to your attention certain observations which are particularly relevant to daa's application provided by those parties who responded to the consultation pursuant to section 7(3) of the 2026 Act.

51. I have considered those observations carefully and highlight the following in particular:

An Coimisiún Pleanála (ACP):

- ACP requests daa to review all survey data relied upon in its EIAR, NIS and WFD assessments to ensure that all data is robust, within date for use and completed within accepted timeframes.
- ACP advises that out-of-date survey data can result in a requirement for updated surveys or further information from daa, which would have the potential to prolong the application process.
- ACP advises that final conclusions remain subject to completion of the environmental assessments by the Commission and any further information, consultation or assessment from daa as required by the Minister or the Commission.
- ACP will expedite any request in relation to this matter, while continuing to discharge its statutory functions independently and in accordance with the requirements of the Act and any applicable statutory procedures.

Fingal County Council (FCC):

- FCC is keen to ensure that the process of assessing the Infrastructure Application (IA) will run efficiently and robustly alongside the Ministerial Order process. The IA will continue

to be assessed in accordance with applicable planning legislation, the Fingal Development Plan, national and regional policies, and the principles of proper planning and sustainable development.

- FCC states that any technical reports prepared and submitted as part of the application under section 7(1) of the Act should be as consistent as possible with the documents submitted to date under the Infrastructure Application.
- FCC notes daa's position that no Environmental Impact Assessment is necessary for the proposed amendment, due to the absence of any proposed works. This reflects daa's position under the 2025 'no build' planning application to raise the passenger capacity limit at Dublin Airport to 36mppa (Fingal planning ref. F25A/0094E).
- FCC wishes to reiterate its position that a proposal to increase operational capacity of the airport above the permitted limit of 32mppa would fall within project class 13 of Part 2 of Schedule 5 of the Planning and Development Regulations 2001 (as amended) and within project type 15 of those Regulations in that the proposal is likely to have significant effects on the environment.
- FCC notes that daa proposes that the Minister amend the existing conditions on passenger limits to clarify that the 40mppa limit would apply to Dublin Airport as a whole. daa further proposes a definition of passengers based on the 'All Passengers on Board' definition by Eurostat. For clarity, it is FCC's position that the reference in the subject condition(s) to million passengers per annum (mppa) to be that as measured in accordance with the CSO and Eurostat and annual reporting of mppa by the CSO is the sole metric in which this is to be quantified.

Transport Infrastructure Ireland (TII):

- TII recognises and supports Dublin Airport in its critical role for the nation's international air transport connectivity and as part the EU Core Trans-European Transport Network (TEN-T).
- TII notes the significant work undertaken by Fingal County Council, in collaboration with daa, NTA and TII, to identify a portfolio of required transport infrastructure and service enhancements that would improve existing airport access and provide for future growth in passenger numbers and associated airport operations.

National Transport Authority (NTA):

- NTA acknowledges that increased passenger throughput at the airport also translates into an increased number of surface transport users accessing the airport.



- NTA notes that the Transport Strategy for the Greater Dublin Area 2022-2042 includes measures to bolster airport accessibility, with the primary measure being the MetroLink project, capable of transporting 20,000 passengers per direction per hour. When operational, it will provide a step change in accessibility to Dublin Airport.
- NTA notes that in advance of the delivery of MetroLink, the higher level of passenger numbers would benefit from further enhancement of the access/egress arrangements to and from the airport. Such enhancements are outside the scope of the proposed passenger capacity uplift application and would require to be considered separately. They would be beneficial in terms of increasing the ease of accessibility to/from the airport in the context of the proposed higher level of passenger throughput.
- NTA recommends that separate from the section 7(1) application, a plan for the delivery of surface access enhancements, or a sub-set of these enhancements, is developed and progressed through implementation. This will require a coordinated approach by a number of stakeholders, in particular daa, Fingal County Council, TII and the NTA.
- NTA notes that the type of surface transport access enhancements that have previously been examined and considered include:

    - an increase in the level of bus services to/from the airport;
    - provision of additional park and ride facilities and connecting services;
    - enhancement of bus facilities and bus passenger facilities at the airport;
    - road infrastructure developments in the vicinity of the airport; and
    - additional bus priority on key routes to/from airport;

- NTA notes that some of these elements are already being progressed through planning processes while others have not yet been developed to any significant level.
- NTA notes that increasing the level of bus service to the airport would require additional PSO funding to support that increase in the case of the State subvented services to the airport.
- NTA suggests that the Surface Access Monitoring Group be reconvened to ensure there is a strong collaborative approach to surface access planning and delivery at Dublin Airport between the relevant agencies.

Irish Aviation Authority (IAA):

- Overall, the IAA's position is that while increasing the cap to 40mppa may offer a short-term workaround, the preferred long-term outcome is the removal of annual passenger throughput limits altogether.

- While welcoming the Act of 2026 and daa's section 7 application, the IAA argues that a revised 40m passenger cap could create the same operational problems currently associated with the 32m cap.
- The IAA notes that if the new airport-wide cap becomes operative, it could quickly constrain airline growth and lead to further disputes around slot allocation, capacity declarations, and compliance obligations.
- The IAA observes that, in parallel with consideration of the 40mppa proposal, the necessary analysis / information which may be required to support an Order to revoke the passenger-cap conditions should be progressed by daa as quickly as possible and should not be slowed down or impeded by the proposed Order.
- The IAA also challenges the assumption that slot coordination can reliably deliver compliance with an annual passenger cap. Since slots are allocated based on aircraft movements rather than passenger numbers, the IAA argues it is impossible to guarantee a particular passenger throughput outcome through slot regulation alone.

I would ask that daa consider these observations carefully and take them fully into account.

Climate Action and Low Carbon Development Act 2015 (Act of 2015)

52. The impact that addressing the passenger cap would have on the climate was also raised during pre-legislative scrutiny. Section 39 of the Act of 2026 provides that the Commission and I are not subject to the requirements referred to in section 15(1) of the Act of 2015. However, notwithstanding that position, there are some provisions in the Act of 2015 that I need to consider in the context of daa's application. The sections in question are sections 4(11), 5(8), 6B(13) and 6C(9).

- **Section 4(11)**

"(11) A Minister of the Government, shall, in so far as practicable, perform his or her functions in a manner consistent with the most recent approved climate action plan and the most recent approved national long term climate action strategy."

- **Section 5(8):**

"(8) A Minister of the Government shall, in the performance of his or her functions, have regard to a national adaptation framework approved by the Government under this section."

- **Section 6B(13)**

"(13) A Minister of the Government shall, in so far as practicable, perform his or her functions in a manner consistent with a carbon budget that has effect under subsection (7) or (11), as the case may be."

- **Section 6C(9)**

"(9) A Minister of the Government shall, in so far as practicable, in the performance of his or her functions, comply with the sectoral emissions ceiling that applies to the sector for which that Minister of the Government has responsibility."

53. The Climate Action Plan provides that, *"International aviation emissions are outside the scope of Climate Action Plan targets. However, it is widely acknowledged that deployment of Sustainable Aviation Fuels (SAFs) will play the greatest role in decarbonising the aviation sector in the short to medium term."*

54. The Long-Term Climate Action Strategy on Green-Houses Gas reductions also highlights that targets only apply to domestic aviation and sets out the reasoning behind the exclusion of international aviation emissions. It states, *"It should be noted that emissions from international aviation and from shipping remain outside national emissions targets for EU Member States and are not covered by the Paris Agreement. To use aviation as an example, due to the complexities involved in the attribution and accounting for international emissions and the international character of aviation, tackling these emissions, as agreed by the IPCC, requires strategies and actions at international level. Measures are being taken in line with actions both at EU level and globally."*

55. The carbon budgets referred to in section 6B(13) are those laid before the Houses of the Oireachtas following approval by Government. The Climate Change Advisory Council published its Carbon Budget Proposal Report in 2024 setting out the carbon budgets from 2021 to 2040 in Figure 1 of that report which also notes:

"Figure 1 shows the proposals for CB3 (2031–2035) and a provisional CB4 (2036–2040) in the context of the adopted CB1(2021–2025) and CB2 (2026–2030). These carbon budget proposals exclude emissions from international aviation and shipping and (as mandated under S.I. 531 of 2021) are calculated based on global warming potential values evaluated over 100 years (GWP100) published in the Intergovernmental Panel on Climate Change Fifth Assessment Report in line with UNFCCC and EU reporting requirements. Before finalising these carbon budget proposals an assessment was undertaken of whether they met the criteria under the 2021 Amended Act in line with the legislation (see Section

3)." The Council has new proposals set out from 2031 to 2040 which also highlight the exclusion of international aviation.

56. Transport emissions ceilings are considered as a cross-sectoral indicator of cumulative emissions and are measured within national ceilings. The Environmental Protection Agency (EPA) monitor emissions caused by the combustion of fuel used in road, rail, navigation, domestic aviation and pipeline gas transport. The EPA reports on these emissions as part of the National Greenhouse Gas Inventory Submission. In accordance with UNFCCC/IPCC guidelines, international aviation emissions are reported separately to the UN as memo items on an annual basis, rather than being included within the national inventory.

57. In considering the making of an Order under section 25(1) of the Act of 2026, I have, as far as is practicable, reviewed whether it would be consistent with the provisions of the Climate Action Plan and the carbon budget laid before the Houses of the Oireachtas, had regard to the national adaptation framework and compliance with the sectoral emissions ceilings for the transport sector.

58. While it is clear that international aviation emissions are outside the scope of the Climate Action Plan, Ireland is taking steps in line with international best practice to move towards decarbonisation of the aviation sector. I published Ireland's first Sustainable Aviation Fuel (SAF) Policy Roadmap in August 2025, with the objective of supporting aviation connectivity in a sustainable manner. The inclusion of a specific commitment to develop a SAF Policy Roadmap in the Programme for Government acknowledges the pivotal contribution that SAFs can make towards mitigating emissions from the sector.

59. With the assistance of the national SAF Advisory Group, my officials are progressing implementation of the SAF Policy Roadmap actions, including a commercial assessment for SAF options in Ireland with the objective of establishing the commercial viability of production domestically, and a review of the infrastructure for aviation fuel transport and storage into and within Ireland, including opportunities to establish and expand the supply of SAF.

60. Notwithstanding the exclusion of international aviation emissions, I have also taken into consideration how Ireland is fully aligned with the global approach to decarbonisation of the aviation industry, which is based on the International Civil Aviation Organisation's 'basket of measures' designed to ensure aviation meets the challenge of decarbonisation, and includes improvements in aircraft design and technology, operational improvements, greater deployment of SAFs and market-based measures.

61. Specific measures have been introduced at EU level mandating increased use of SAFs on flights at EU airports under the ReFuel EU Aviation Regulation. In relation to market-based measures, intra-EU flights have been within the scope of the EU Emissions Trading Scheme since 2012, requiring all airlines operating within the European Economic Area (EEA), to surrender allowances against those emissions. The Carbon Offsetting and Reduction Scheme (CORSIA) adopted by the International Civil Aviation Organisation is applied to emissions from international aviation departing to Third countries.

62. At a national level, our airports are also taking steps to reduce their environmental impact. These measures contribute to an overall reduction in the carbon footprint of aviation, extending sustainability efforts beyond the aircraft and fuel, to include the entire aviation ecosystem.

63. In terms of the National Adaptation Framework, one of the key outputs is to work towards the development of Sectoral Adaptation Plans (SAPs) to support capacity building towards an effective and robust approach to adaptation in Ireland. I published the Transport SAP II 2025-2030 to plan for climate resilience and safeguard the transport network. A key action arising from that plan is for all State and Regional Airports and air navigation infrastructure will be covered by climate adaptation plans which consider the most recent climate projections for Ireland to support climate-proofing for both existing and planned future infrastructure. My officials are working with the relevant authorities to support them in the development of their individual adaptation plans by the second quarter of 2027.

64. Noting the application of these sections in the Act of 2015 to domestic aviation, I have considered the impact of making an Order in terms of an increase in the passenger cap planning condition as it related to the operation of domestic flights at Dublin Airport. There are two scheduled domestic routes operating from Dublin Airport. The first is a Public Service Obligation flight which is subsidised by the Government between Dublin Airport and Donegal Airport. The second is a commercial route between Dublin Airport and Kerry Airport operated by Ryanair.

65. This accounts for 2 outbound and 2 inbound flights daily on each route so 8 flights per day in total. Having reviewed the overall passenger figures for 2025, the total number of passengers using these domestic flights accounts for 0.5% of the total number of passengers that used Dublin Airport in 2025. When this is considered in terms of aircraft movements, domestic flights accounted for around 1% of all passenger aircraft movements at Dublin Airport. No change in the number of scheduled domestic flights on these routes is anticipated if the passenger cap is increased.

66. Aviation emissions are not the only factor I need to consider. An increase in passenger numbers will most certainly lead to an increase in road traffic and the emissions and noise from that traffic needs to be taken into account. I note the assertions set out on page 4 of daa's application which state:

"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 Per 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."

67. I note from Chapter 5 of daa's application that an Environmental Impact Assessment Report is being prepared in support of making an Order and that this report identifies by environmental topic, the findings to date on the likely significant effects of the proposed Order along with the mitigation, monitoring or control measures identified. daa provides a summary of the findings under each heading, including in relation to air quality, non-aircraft noise and the climate and overall state that the findings to date indicate that the proposed Order is not likely to give rise to significant adverse effects on the environment.

68. However, daa highlights that the final conclusions remain subject to completion of the environmental assessments and to any further information, consultation or assessment required by the Commission. As is required under the Act of 2026, it is my intention to have the environmental impacts of the making of an Order independently assessed by the Commission. Such assessments will include consideration of an increase in road traffic in terms of climate, emissions and noise and I will take the outcome of those assessments into account when making a final decision on the making of an Order.

69. Overall, it is my view that the making of an Order to increase passenger numbers from 32mppa up to 40mppa will not materially impact on the emissions arising from scheduled domestic flights at Dublin Airport which are a very small fraction of the overall aircraft movements.

70. I am taking the necessary steps, in line with international best practice to move towards decarbonisation of the aviation sector and as such, it is my view that I have, as far as practicable, met any requirements placed on me under the Act of 2015. In addition, I listened to the concerns raised during pre-legislative scrutiny and made changes to the legislation on foot of those concerns. In particular, I removed the requirement for screening of environmental assessments and inserted a provision prohibiting the making of an Order until those assessments are carried out.

Impact on Local Communities

71. As I highlighted under paragraph 36, the independent economic study undertaken by InterVISTAS on behalf of daa in 2023 set out figures for direct employment generated by Dublin Airport. That study also provides that the total direct Gross Value Added (GVA) generated by Dublin Airport is estimated to be over €1.8 billion. The study highlighted an analysis conducted on the regional location of these economic impacts, which found that 90% of the direct impact (17,900 jobs and €1.7 billion in GVA) was generated in Fingal, with the remaining 10% generated in the rest of Dublin and Ireland. This demonstrates the importance of Dublin Airport to the local community in terms of employment. A cut in over 4 million passenger numbers would impact significantly on local communities.

72. Local communities have raised concerns around the flight paths being used for the Northern Runway in relation to the noise impacts. This was also raised during debates for pre-legislative scrutiny for the Act of 2026 where it was considered that an increase in the passenger numbers would compound those concerns. To address this, I have committed to ensuring that an independent assessment of the flight paths at Dublin Airport will be undertaken at the appropriate time. The most suitable point for this work will most likely be when a final decision is made regarding the North Runway Relevant Action. This timing will ensure that the assessment is based on the most accurate and current operational data, incorporating the latest noise modelling methodologies, and can support the identification of appropriate solutions.

73. Noise concerns generally have also been raised with me by local residents in the context of an increase in passenger numbers. In the event that I decide to make an Order, I will notify Fingal County Council which may wish to consider whether any action is necessary in its role as the Aircraft Noise Competent Authority (the Authority). However, I note that the Authority has published a draft regulatory decision in relation to the noise impacts and proposed mitigation measures associated with daa's Infrastructure Application which seeks to increase passenger numbers from 32mppa to 40mppa as well as building new piers and contact stands to

accommodate future growth. As such, any potential negative impacts in terms of noise from the making of an Order as proposed by daa will likely be mitigated by a regulatory decision of the Authority on that planning application.

74. It is important to me that all relevant stakeholders are considered in the context of any developments at Dublin Airport and I will continue to engage with daa in relation to the good neighbour policy to ensure that the measures it is implementing are as flexible and broad as possible to mitigate any potential impacts experienced by local communities on foot of the making of any Order.

75. On balance, it is my view that the making of an Order as proposed by daa is of more benefit to the local communities in the vicinity of the airport. While there are certainly legitimate concerns, I believe that any negative impacts can be mitigated to ensure that the airport is developed in a sustainable manner and the concerns of local communities are adequately addressed.

Legislative requirements under the Act of 2026

76. Under section 7(2) of the Act, daa's application must satisfy the following requirements and must:

    (a) include details of the passenger capacity condition and the relevant permission to which it is attached;
    (b) propose the manner in which a passenger capacity condition attached to a relevant permission should be amended or revoked;
    (c) include the reason for making the application;
    (d) include the information referred to in section 12(2) (information on the specific characteristics of the proposal, including its location, its technical capacity and its likely impact on the environment); and
    (e) refer to any of the matters mentioned in paragraphs (a) to (f) of section 25(2) that are relevant to the application.

77. daa has clearly provided details of the passenger capacity condition and relevant permission as required under paragraph (a) above. This is set out in Chapter 1.2 of its application.

78. The manner in which the passenger capacity condition is to be amended is set out by daa in Chapter 1.5 of its application. daa is seeking an amendment to the relevant planning conditions from 32mppa to 40mppa and for this to apply to the airport as a whole. daa has requested that the

definition of “all passengers on board” align with the definition provided within the Eurostat Reference Manual on Air Transport Statistics.

79. Chapter 3 of daa’s application sets out the reasons for the making of an application in line with the requirements in section 7(1)(c).

80. Under section 7(1)(d), daa must include the information referred to in section 12(2) of the Act of 2026, which requires information on the specific characteristics of the proposal, including its location, its technical capacity and its likely impact on the environment. The specific characteristics and location have already been identified by the material referenced in paragraphs 77 and 78. daa has addressed the technical capacity requirement under Chapter 4 and Appendix 4 of its application and information on the likely impact on the environment under Chapter 5 and Appendix V of its application.

81. Sections 25(2)(a) to (f) relate to the policies, plans and strategies of the Government that daa may wish to reference. daa reference several National, Regional and Local Policies in support of its application at Chapter 3.4 of its application. In addition, I have considered the relevance of these policies, as highlighted at paragraph 48.

Conclusion

82. I have considered daa’s application and am of the view that all the requirements of section 7(2) of the Act of 2026 have been satisfied. I have taken into account the application from daa, and I am of the view that should the 32m passenger capacity condition remain in place, that this would be likely to cause the serious harm referred to under section 25(1)(a) to (c) of the Act of 2026. I have also considered the submissions provided on foot of the consultations carried out under section 7(3) of the Act of 2026 and am of the opinion that these submissions support my assessment of daa’s application. In addition, I have had regard to the various frameworks and plans referenced at section 25(2) of the Act of 2026.

83. At this juncture, it appears to me that the principal goals of the 2015 National Aviation Policy, including to develop Dublin Airport as a secondary hub, remain valid and my view is that maintaining the passenger cap planning condition is contrary to those goals. I am minded to accept, subject to the outcome of environmental assessments, the reasons put forward by daa for the making of an Order and the estimates provided through the InterVISTAS Economic Impact Study in relation to economic impacts of maintaining the 32 million passenger cap.

84. Any proposed Order to amend the passenger cap planning condition 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. In addition, I have already highlighted the actions being taken to move towards decarbonisation of the aviation sector and ensure that the provisions of the Act of 2015 are met as far as practicable.

85. While it is clear that any proposed Order does not include any new vehicular or pedestrian access arrangements or alterations to the existing road layout serving Dublin Airport, it does have the potential to influence the demand for travel to and from Dublin Airport. I note that this has been considered in the context of daa's EIAR and I am satisfied that it will be fully considered as part of the environmental assessments to be undertaken by the Commission, which I will fully and carefully consider before the making of any Order.

86. I note that the technical capacity associated with the making of an Order has been assessed by independent consultants on behalf of daa, who have concluded that the estimated capacity of existing facilities is 40.5mppa and will therefore accommodate the increase in passenger numbers up to 40mppa.

87. daa has made a strong case for the making of an Order supported by evidence from independent economic assessments.

88. While environmental assessments need to be independently carried out by the Commission, at this juncture, I have not seen any evidence of such impacts on the environment at this stage that would prevent me from accepting daa's application. I emphasise again however that this view is preliminary and is subject to my full and careful consideration of the competed environmental assessments that will have to be carried out.

89. It is my view that maintaining the 32 million passenger cap planning condition is likely to cause serious harm to the economy of the State. This is not just from the perspective of future growth, but maintaining the passenger cap is likely to result in a cut to existing passenger numbers, harming Ireland's existing international connectivity and employment. Maintaining the passenger cap would also prevent future growth and hamper the actions set out in the Government's Action Plan on Market Diversification 2025 to enhance direct air connectivity with new and emerging markets.

90. While Ireland has a stellar reputation in relation to the aviation and aerospace sector, there is no doubt that the negative publicity around the passenger cap has the potential to damage Ireland's

international reputation as regards air transport. There is also the ongoing complaint by Airlines for America to the US Department of Transportation, which I am sure will remain live until such time as the passenger cap is addressed.

91. daa notes the power that I have under section 7(5) of the Act of 2026 to vary its proposal and that should I wish to vary that proposal to revoke the passenger cap, it would be delighted to provide the relevant information. I also note the statements daa has made in relation to the urgency around the making of an Order and its contention that its planning application does not address the risk around timing. I agree that the quicker this matter is addressed the better.

92. I am aware that daa has applied to Fingal County Council for planning permission to increase the passenger cap planning condition from 32mppa to 40mppa and for the construction of new aircraft piers and contact stands. As both daa's planning application, and its application for the making of an Order under the Act of 2026, has been prepared by reference to an operational scenario of 40mppa, I do not intend to consider a revocation of the passenger cap at this stage and instead intend, subject to a consideration of the completed environmental assessments, to accept daa's application as proposed - to amend the 32 million passenger cap to 40mppa and to apply it to the airport as a whole.



_____

Darragh O'Brien TD
Minister for Transport
11 September 2026

Sinead Singleton

From: Eimear Reilly
Sent: Monday 14 September 2026 10:58
To: Eimear Reilly
Subject: FW: Section 7 of the Dublin Airport (Passenger Capacity) Act 2026 -ACP-324637-26
Attachments: 20260911 Section 12(1) letter to ACP re scoping opinion.pdf; Dublin Airport Scoping 2026.docx

From: Transport MINISTER'S OFFICE <Minister@transport.gov.ie>
Sent: Friday, September 11, 2026 12:11 p.m.
To: Peter Mullan <peter.mullan@pleanala.ie>
Subject: Section 7 of the Dublin Airport (Passenger Capacity) Act 2026

You don't often get email from minister@transport.gov.ie. Learn why this is important

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear Mr., Mullan,

The Minister for Transport has received an application from daa under section 7 of the Dublin Airport (Passenger Capacity) Act 2026 for the making of an Order to amend the passenger cap planning condition at Dublin Airport. In accordance with section 12(1) of the Act, please find attached request from Minister O'Brien seeking a scoping opinion on the information for inclusion in an Environmental Impact Assessment Report for the making of such an Order.

Thank you

Kind Regards

Lisa

Lisa O'Sullivan
Ministers Office

An Roinn Iompair
Department of Transport

Lána Líosain, Baile Átha Cliath, D02 TR60
Leeson Lane, Dublin, D02 TR60



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Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

Tá ár Ráiteas Príobháideachta le fáil ar www.gov.ie/transport

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Siobhan White
Strategic Infrastructure Development
Ext: 7139

Má fhaigheann tú an ríomhphost seo lasmuigh de na gnáthuaireanta oibre, ní bheidh mé ag súil le freagra ná gníomh lasmuigh de d'uaireanta oibre féin.

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An Roinn Iompair
Department of Transport

11 September 2026

Mr. Peter Mullan
Chief Executive Officer
An Coimisiún Pleanála
64 Marlborough Street
Rotunda,
D01V902

By email only – peter.mullan@pleanala.ie

Dublin Airport (Passenger Capacity) Act 2026
Request for a Scoping Opinion

Dear Peter,

I received an application from daa public limited company on 5 August 2026, seeking the making of an Order pursuant to section 25(1) of the Dublin Airport (Passenger Capacity) Act 2026 (Act of 2026) to address the passenger cap at Dublin Airport. In particular, daa has sought the making of an Order to increase the passenger cap planning condition from 32 million passengers per annum to 40 million passengers per annum (mppa) and for this to apply to the airport as a whole.

On 11 September, I sent a formal notification to daa giving notice of my intention to accept the proposal contained in its application and of my intention to make an Order under section 25(1) amending the relevant passenger capacity conditions in the manner proposed. No such Order will be made unless the environmental assessments required by Part 3 have been completed and the requirements of sections 24 and 25 are satisfied.

As you know, under the Act of 2026, responsibility for carrying out an Environmental Impact Assessment (EIA) and Appropriate Assessment (AA) for the making of an Order lies with An Coimisiún Pleanála (the Commission). Furthermore, under section 24 of the Act of 2026, I am prohibited from making an Order until those assessments have been completed.

In line with sections 13 and 19 of the Act of 2026, it is my intention to apply to the Commission in due course for the carrying out of the EIA and AA. However, in advance of that and pursuant to

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section 12(1) of the Act of 2026, I formally request an opinion from the Commission on the scope and level of detail that should be included in the EIA Report associated with the making of an Order to amend the passenger cap planning condition at Dublin Airport from 32mppa to 40mppa.

Under section 12(2) of the Act of 2026, I am required to provide information on the specific characteristics of the proposal, including its location, its technical capacity and its likely impact on the environment. I have provided this information in the attachment to this letter based on material set out in daa's application.

In accordance with section 12(4) of the Act of 2026, the Commission must provide its scoping opinion not later than 6 weeks after it receives the request. As such, I expect to receive the Commission's scoping opinion by 23 October 2026. I note that the Commission must consult with the prescribed bodies under section 12(3) and this will be challenging given the tight timelines involved. However, I ask that the strict timelines included in the legislation be adhered to, so as to ensure that daa can finalise the EIA Report and Natura Impact Statement to allow me to formally apply for the environmental assessments to be carried out as soon as possible.

I look forward to hearing from you in due course, and my officials are available should you need any further information or clarification.

Yours sincerely,

Darragh O'Brien TD
Minister for Transport

Dublin Airport (Passenger Capacity) Act 2026
Request for a Scoping Opinion

A. Characteristics of the proposed Order

Description of the proposed Order

1. daa has made an application for a proposed Order under the Act of 2026 seeking to amend 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).

2. The existing passenger capacity conditions 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."*

3. daa is seeking to increase the limit from 32mppa to 40mppa and for this limit to apply to Dublin Airport as a whole. daa has also requested that the enumeration of passengers as provided by the Order would be based on the definitions of "All Passengers on Board" provided with Eurostat Reference Manual in Air Transport Statistics, which is the format used by daa when reporting

passenger numbers to the CSO as required under Regulation (EC) 427/2003. That definition is as follows:

"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 (counted at arrivals and departures)."

4. For clarity, direct transit passengers are defined 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.

5. 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 (i.e. it does not include the construction, alteration or extension of buildings, runways, taxiways, aprons, roads or other airport infrastructure).

6. The increase in passenger numbers and associated airport activity facilitated by the proposed Order would be accommodated within existing airport infrastructure, including the runway system, terminal buildings, aircraft operational areas, landside transport infrastructure and supporting operational facilities.

Site Location and Application Boundary

7. The proposed Order relates to Dublin Airport, County Dublin. The application boundary is shown in Figure 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.

8. 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.

9. 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 Special Area of Conservation (SAC)/Special Protection Area (SPA) and Malahide Estuary SAC/SPA.

Figure 1: Application boundary



B. Technical Capacity and 40mppa Operational Scenario

10. Consultants (Ricondo & Associates) were engaged by daa to establish the current capacity of the existing facilities and infrastructure at Dublin Airport. The capacity assessment is a partial update to the previously completed baseline capacity assessment included in the Capacity Assessment Report for daa's Infrastructure Application which is currently being considered by Fingal County Council. The capacity assessment supports the conclusion that the assessed level of airport activity can be accommodated within existing airport infrastructure and operational systems. A copy of that independent report by Ricondo & Associates is attached.

11. The 40mppa operational scenario is derived from current passenger growth trends, existing passenger throughput (approximately 36.4mppa 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.

12. In assessing existing airport infrastructure, the capacity report prepared by Ricondo & Associates 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.

13. Whilst the operational capacity of Dublin Airport is determined by the capability of the airport's infrastructure and operational systems, surface access capacity must also be considered in terms of passenger growth. As such, daa advises that the relationship between airport operations and the surrounding transport network is being assessed in detail as part of the Environmental Impact Assessment Report (EIAR).

14. daa further advise that the technical-capacity information informs the EIAR, Natura Impact Statement (NIS) and Water Framework Directive (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.

C. Environmental Assessments

15. In order to support me in determining the appropriate notification to make under section 7(5) of the Act of 2026 in response to daa's application, and to provide sufficient material to the Commission to seek a scoping opinion on the EIAR, it appears to me that the environmental assessment work undertaken to date by daa has progressed substantially beyond that typically associated with the scoping stage of the EIA process.

16. However, any conclusions remain subject to completion of the independent environmental assessments by the Commission and to any further information, consultation or assessment required. I am not prejudging the outcome of those independent assessments and will fully consider them before making a final decision on the making of an Order.

Natura Impact Statement

17. For your information and for completeness, I also note that the Natura Impact Statement (NIS) being prepared by daa provides the information required to inform the Appropriate Assessment of the proposed Order under the Habitats Directive. 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 or not the proposed Order would adversely affect the integrity of any European site.

Environmental Impact Assessment

Defined assessment scenarios

18. For the purposes of the environmental assessments, daa has developed four schedules for assessing the likely significant environmental effects of the proposed Order. The schedules distinguish between the existing permitted capacity baseline; the 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. These schedules are expanded further below.

19. **Schedule 1: Existing Permitted Capacity (Baseline) (2023):** The 2023 baseline schedule represents the existing permitted baseline and planning position, reflecting the existing 32mppa 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, daa advise that the underlying busy day schedule reflects a level of activity broadly consistent with an airport operating at circa 32mppa.

20. **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 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.

21. **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.

22. **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.

23. The schedules set out in Figure 2 below represent the forecast day, evening and night air traffic movements (ATM) breakdown used for the current assessment. daa advises that the schedules are based on updated forecasts and are separate from those used for the North Runway Relevant Action (NRRA) which was based on a forecasting dataset from 2020/2021 and which did not reflect the faster than anticipated recovery in air traffic following COVID-19. daa further notes that the schedules set out in Figure 2 do not apply an annual night-time movement limit given the EU Commission's decision in February this year but do assume operation in accordance with the Noise Quota Scheme.

Figure 2: 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

*** Operational Assumptions: It is assumed that, in 2029, the operating parameters for the runway system will reflect the decision by An Coimisiún Pleanála on the NRRA, including North Runway operating hours of 06:00 23:59 and an Noise Quota Scheme 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.*

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

24. daa advises that the assumptions are considered to represent the most realistic and supportable basis currently available for the assessment and 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 Noise Quota Scheme 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.

25. The operational schedules described above provide the basis for the assessment framework proposed to be adopted within the EIAR. The assessment framework is summarised in Figure 3 below.

Figure 3: 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.

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

27. In addition to the Principal Assessment, some environmental topics include one or more Supporting Assessments which are supplementary and 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.

28. 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. Figure 4 summarises how the assessment framework has been applied across each environmental topic.

Figure 4: Assessment Framework by Environmental Topic

Environmental Topic	Supporting Assessments	Reason	Assessment Approach
Traffic and Transport	Yes	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	Yes	Supporting Assessments provide planning and operational context for changes in emissions	Quantitative transport modelling supported by qualitative assessment

		associated with airport operations and surface access traffic.	
Non-Aircraft Noise	Yes	Supporting Assessments provide planning and operational context for changes in landside operational noise associated with differing levels of airport activity.	Quantitative transport modelling supported by qualitative assessment
Aircraft Noise and Vibration	No	This 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	No	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 judgment.
Water	No	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 support by the Water Framework Directive
Biodiversity	No	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 judgment.
Natura Impact Statement (including Appropriate Assessment Screening)	No	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	Yes	Supporting Assessments provide planning and operational control 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	No	The Proposed Order does not introduce new physical impacts on heritage assets. The Principal Assessment is sufficient to assess operational effects where relevant.	Desk-based assessment supported by professional judgment.
Landscape and Visual	No	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 judgment.
Material Assets (Waste)	Yes	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)	Yes	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	No	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	No	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.

D. Proposed Scope of the EIAR

Operational assumptions

29. 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, daa has defined a common set of operational assumptions that describe the airport operating conditions associated with the proposed Order and which provide the basis for the supporting environmental assessments.

30. The principal operational characteristics associated with the proposed Order comprise:

- Passenger throughput including the existing permitted (32mppa), current operations (36.4mppa); forecast proposed Order Scenario (40mppa); do nothing scenario (32mppa), 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 operational assumptions relating to runway operating hours, the North Runway Relevant Action (NRRA) including North Runway operating hours of 6am to midnight and the Noise Quota Scheme (the aircraft movement limit has not been included based on the decision by the European Commission of 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.

Environmental Impact Assessment Report Chapters

31. The EIAR identifies, describes and assesses the likely significant environmental effects associated with the proposed Order by reference to the Primary Assessment as summarised in Figure 3 earlier.

Figure 5 below provides an overview of the EIAR chapters that will establish the context for the topic-specific environmental assessments.

Figure 5: 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.

Access Arrangements

32. 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.

33. Notwithstanding this, the proposed Order has the potential to influence the demand for travel to and from Dublin Airport. Accordingly, operational assumptions have been included 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.

34. 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.

Resources used in Operation

35. The operational characteristics have been assessed in support of the proposed Order and daa indicates that the assessment undertaken to date illustrates that the forecast demand for utilisation of operational resources, including electricity, gas, water, telecommunications and other utility 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.

Relationship with Other Existing and Planned Projects

36. daa has considered the proposed Order 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 are:

- North Runway Relevant Action (NRRA) – daa make the assumption that in 2029 the operating parameters for the runway system will reflect the planning decision by An Coimisiún Pleanála on the NRRA, including North Runway operating hours of 06:00-23:59 and NQS of 16,260 QC points but without the movement limit included in that decision, having regard to the decision of the European Commission dated 10 February 2026;

- Infrastructure Application – a live planning application seeking consent for airport infrastructure improvements currently under consideration by Fingal County Council and the subject of a draft regulatory decision issued by the Aircraft Noise Competent Authority (ANCA) dated 28 May 2026;

- Airport Drainage Masterplan – a strategic programme for future drainage improvements. Individual projects arising from the Masterplan would be progressed separately, where required. One such project is the Airfield Drainage Project, 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.

37. Having regard to the assessment principles applied by daa, while none of the approvals, consent processes or developments mentioned above form an integral part of, or are functionally or legally interdependent with, the proposed Order, their relationship with the proposed Order has nevertheless been considered by daa in defining the supporting environmental information and, where relevant, identifying cumulative environmental effects.

Alternatives Considered

38. daa highlight that 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.

Water Framework Directive Assessment

39. daa notes that the Water Framework Directive (WFD) Assessment provides the information necessary to determine whether the proposed Order is consistent with the objectives of the Water Framework Directive. 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 the objectives of the WFD.

40. daa further notes that 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.

41. Based on the assessment completed to date, daa state that the proposed Order is not expected to cause deterioration in the status of any surface water or groundwater body or prevent the achievement of WFD objectives. Existing and proposed drainage infrastructure, pollution control

measures, operational water management measures have been taken into account in the assessment.

Summary of likely Environmental Impacts

42. daa advises in its application that the environmental assessments undertaken to date indicate that the proposed Order is not likely to give rise to significant adverse effects on the environment. It is expected that the proposed Order will not adversely affect the integrity of any European site, either alone or in combination with other plans or projects and that the assessment under the WFD 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 WFD objectives.

43. However, as indicated earlier, the final conclusions remain subject to completion of the independent environmental assessments by the Commission and to any further information, consultation or assessment required.

44. The table at Figure 6 below has been provided by daa for the purposes of section 12(2) of the Act of 2026 and summarises the likely impact of the proposed Order on the environment based on the information available at this stage of the statutory process. 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 identified.

Figure 6: 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 6-5**	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 12-5**	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.

Copy of Capacity Assessment by Ricondo - (Appendix IV) of daa's application.

RICONDO®

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 data, assumptions 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 analyses, 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.

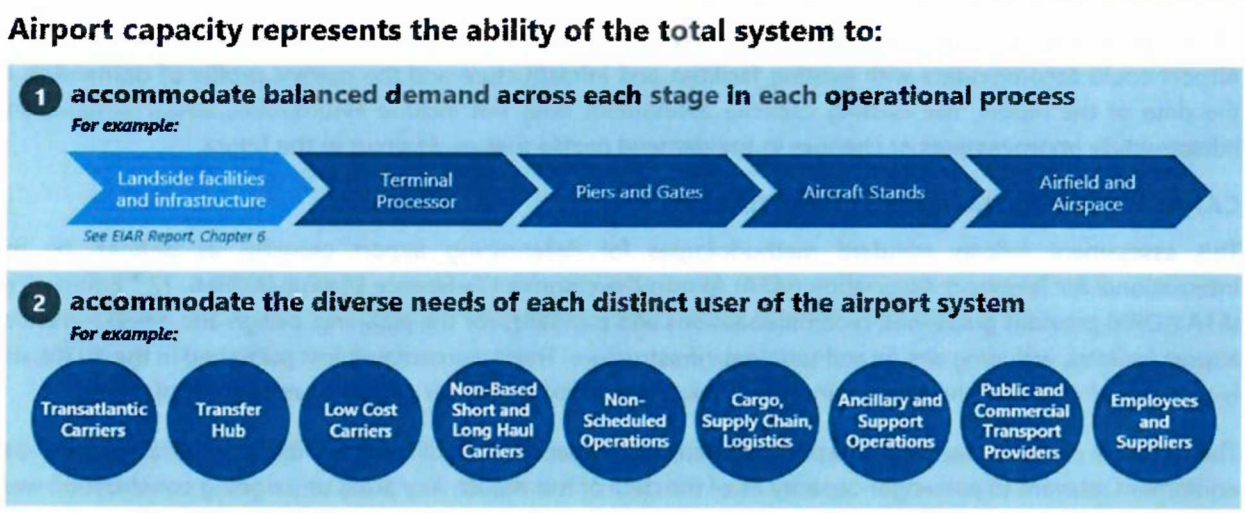
No single element of the system defines the total airport capacity. There are two key considerations in establishing the capacity of the system:

- **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

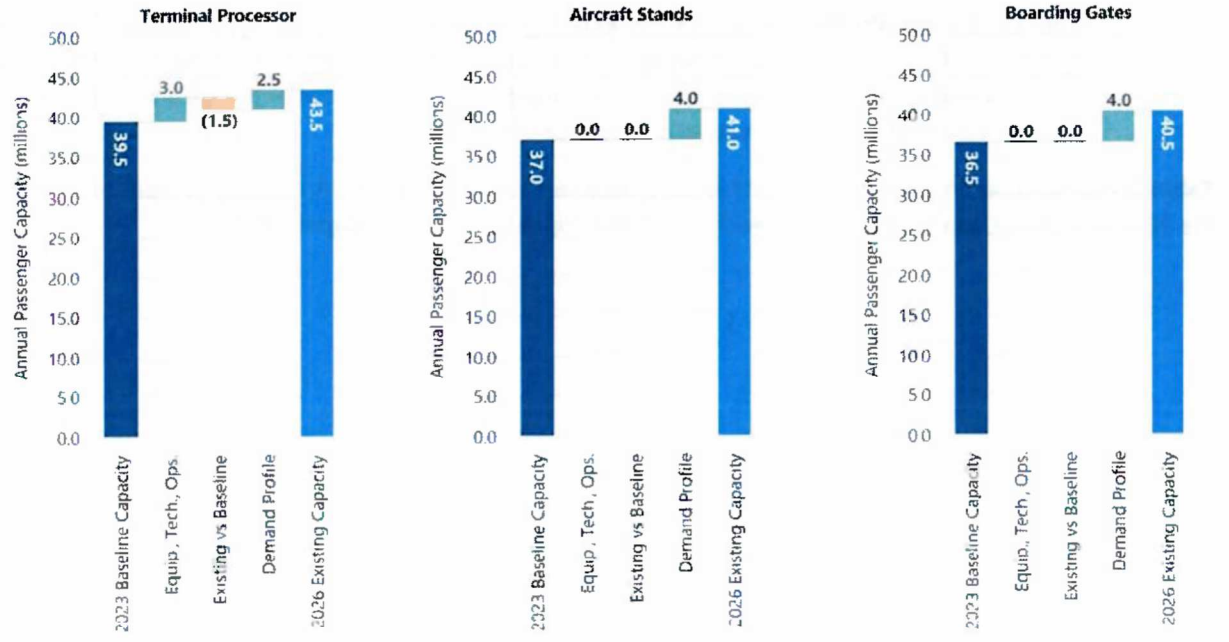
CATEGORY	EXAMPLE
Equipment, Technology and Operational Improvements	daa has deployed C3 cabin baggage screening equipment in Terminals 1 and 2, increasing the capacity of the central search facilities.
Demand Profile	Average number of seats per aircraft and load factor during a busy day at Dublin Airport 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**.

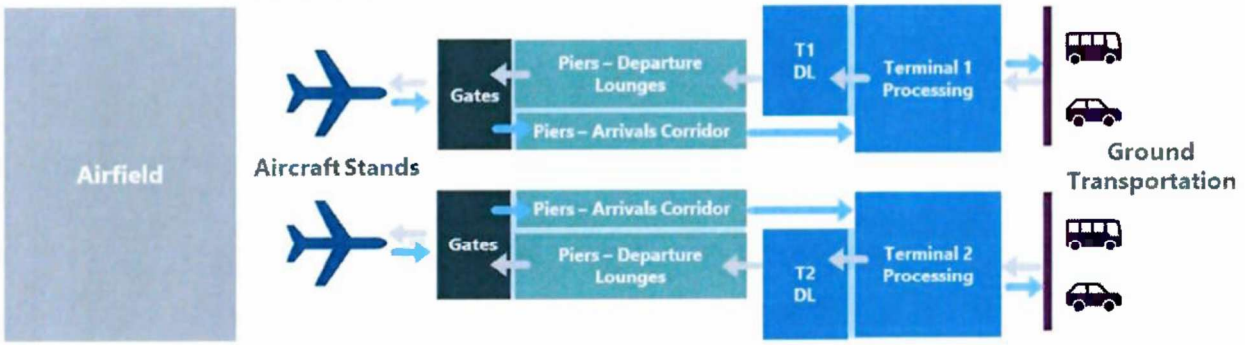
2. CAPACITY METHODOLOGY OVERVIEW

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

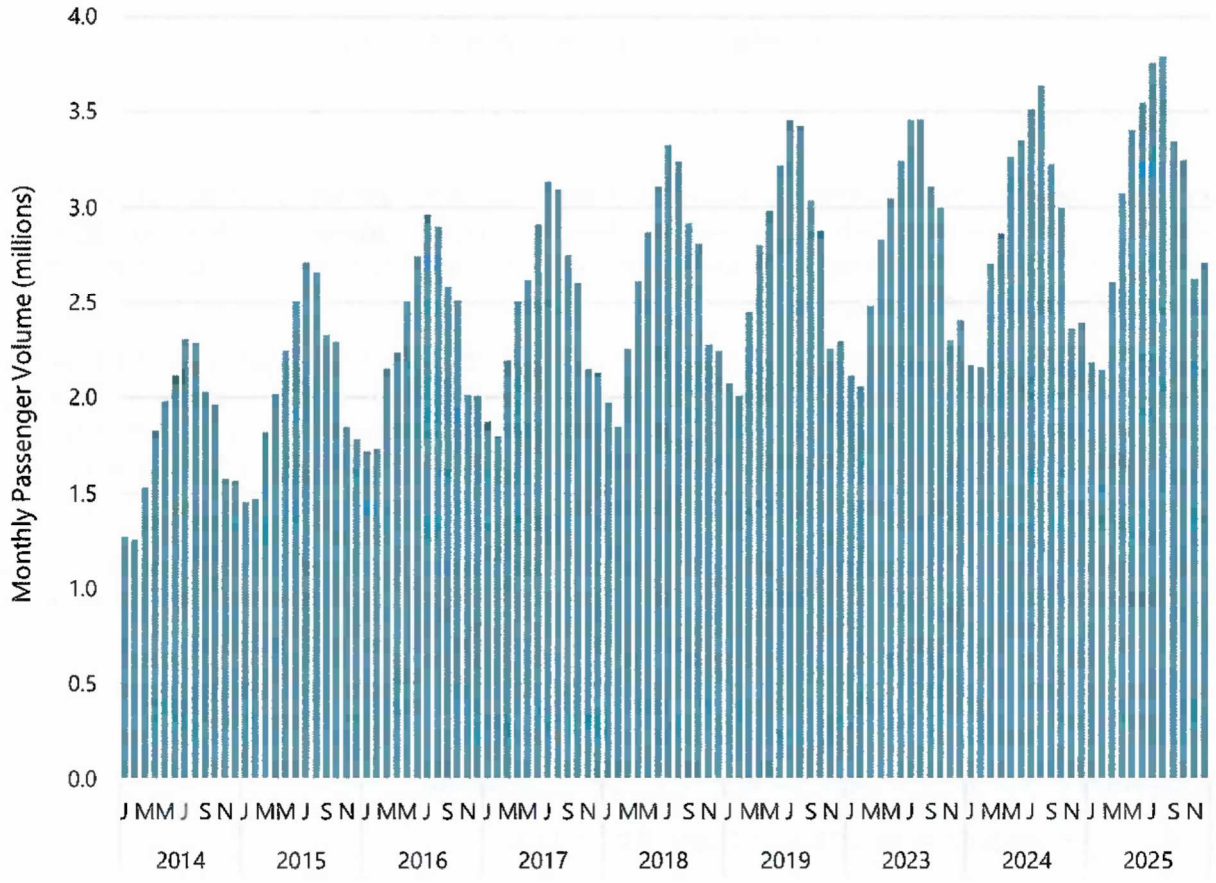
The capacity assessment for commercial passenger operations at Dublin Airport utilises standard methodologies published by the International Air Transport Association (IATA) in the Airport Development Reference Manual (ADRM), Edition 12. Key considerations for evaluating capacity include the following.

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.

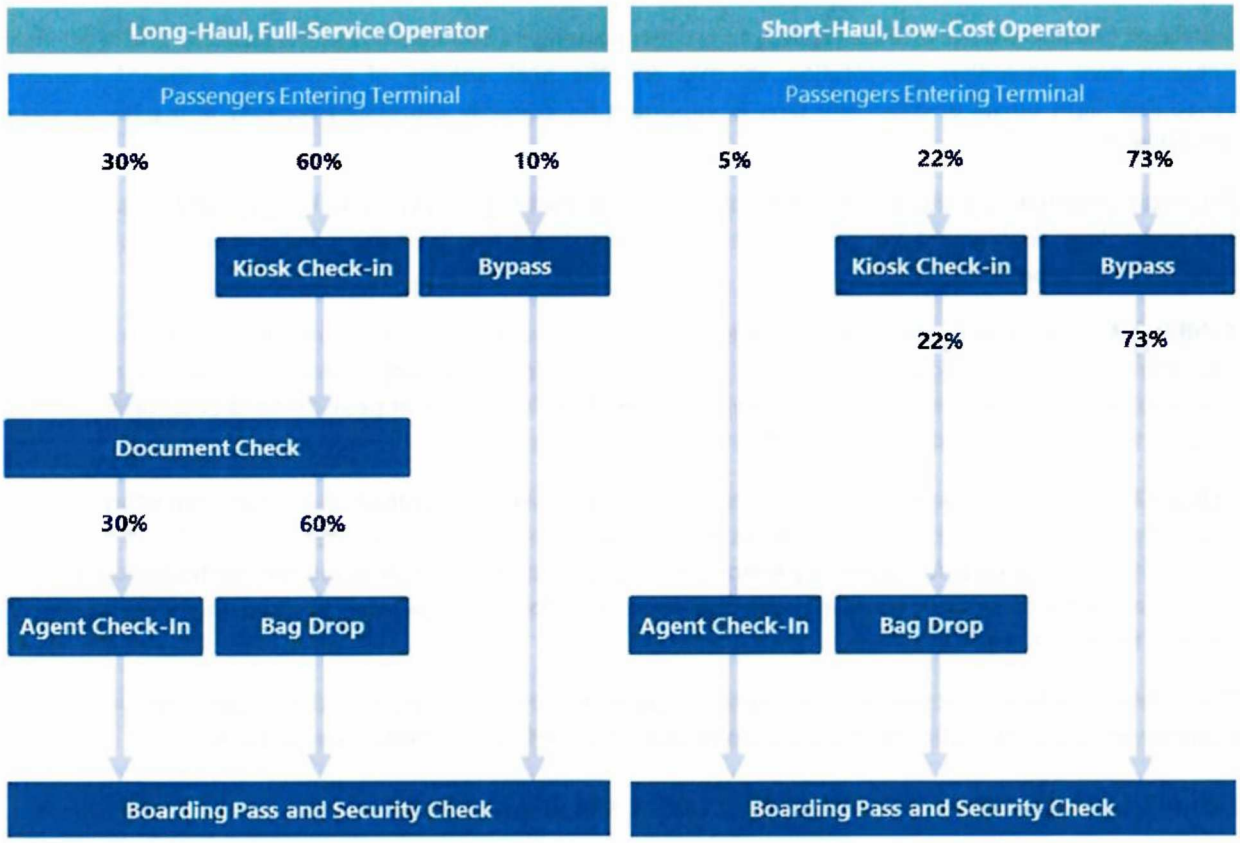
Presentation profiles, representing the volume of passengers presenting at individual processing functions, are established by a combination of the show-up profiles and the flow distribution percentages.

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.

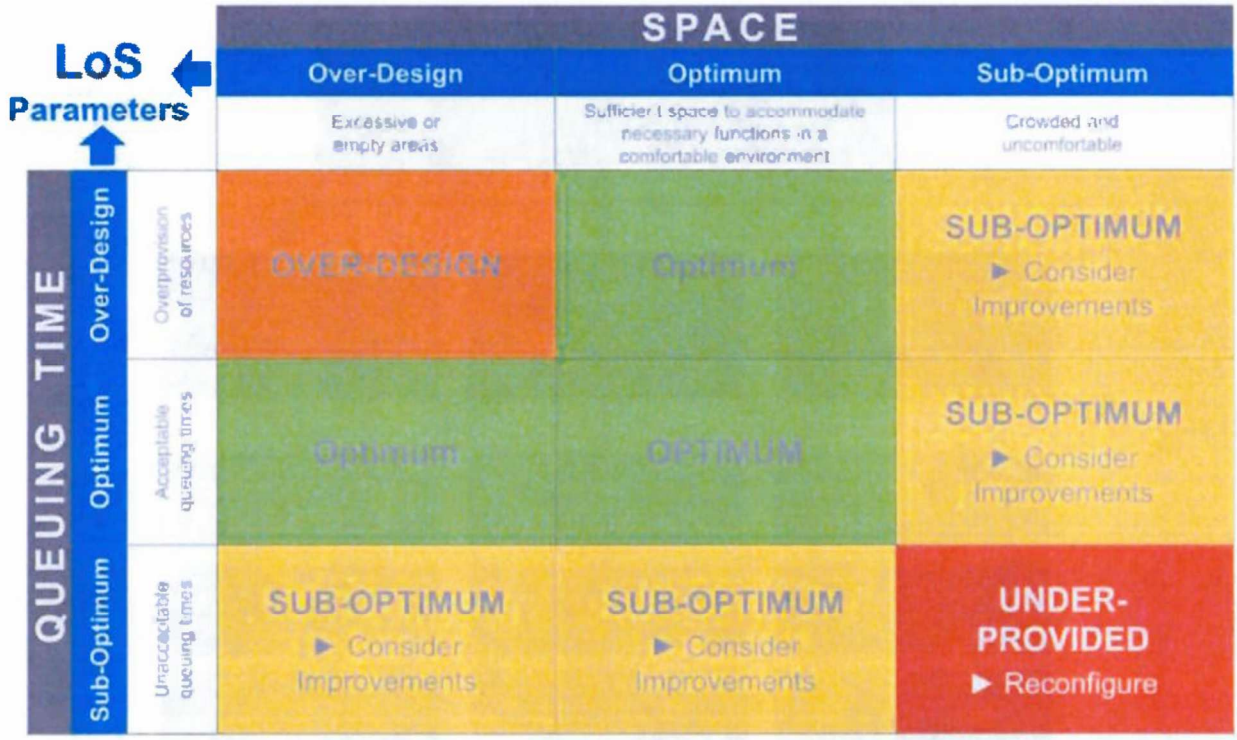
Peak hour capacity is calculated for each processing function, representing the volume of passengers that can be physically handled at the facility in a peak period. The presentation profile percentages are applied to the peak processor capacity to express the peak hour capacity in terms of scheduled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

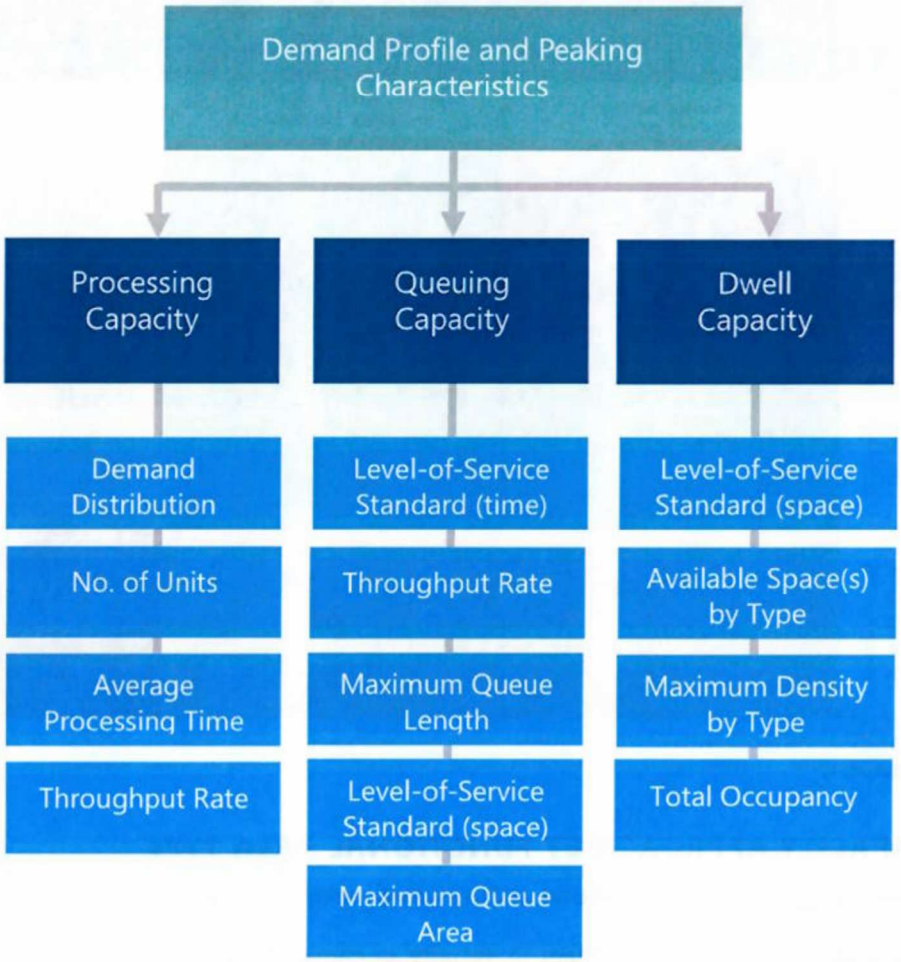
2.2.4 CAPACITY APPROACH BY FUNCTIONAL AREA TYPE

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.

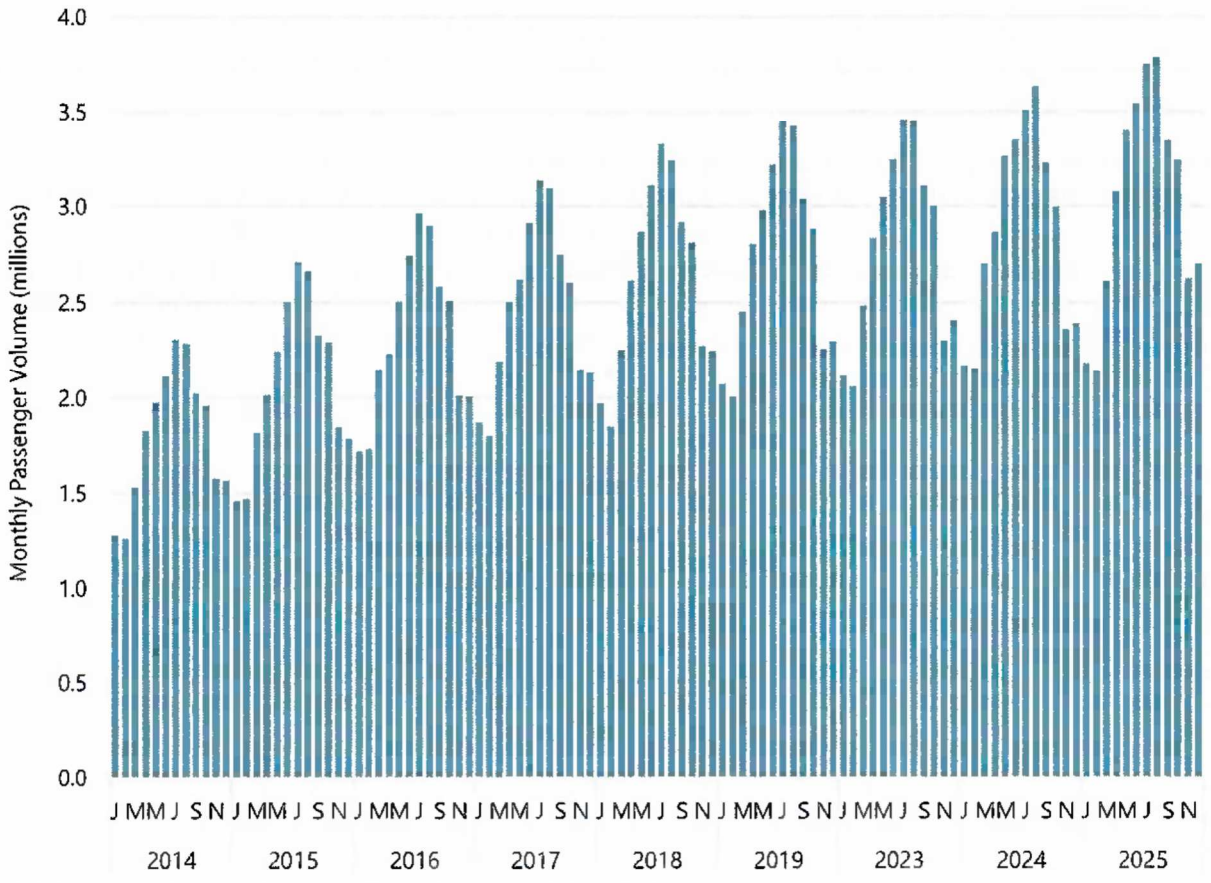
3. DEMAND PROFILE

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.

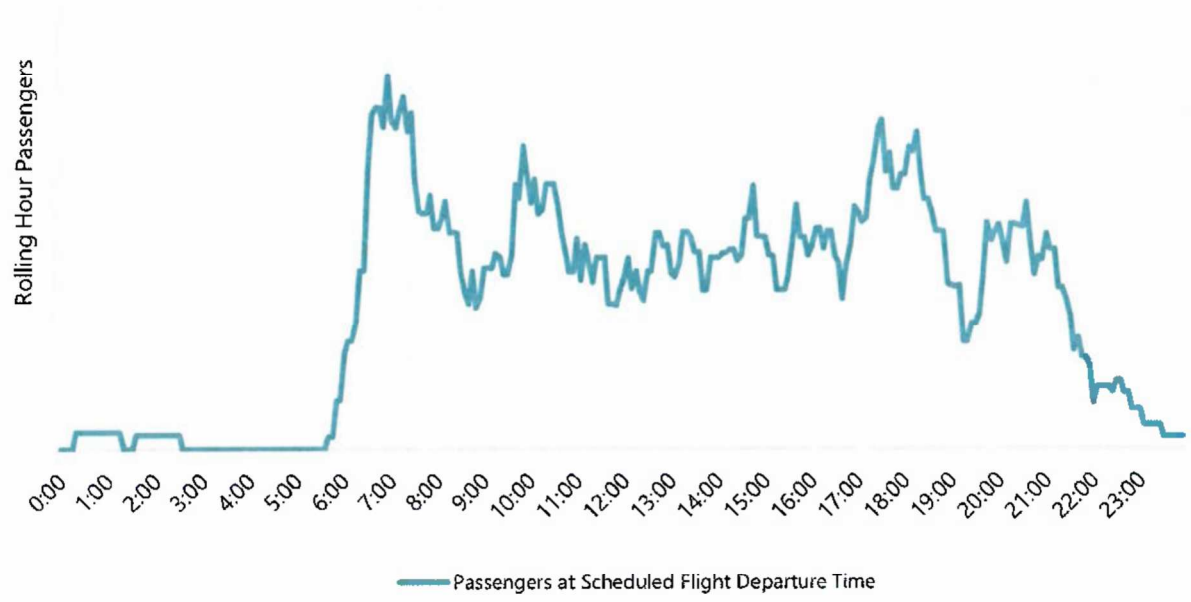
The demand profile represents the pattern of unconstrained demand across a year, peak months, busy days, and peak hours, establishing how much of the theoretical 24 hours a day, 365 days a year that capacity will be utilised by airlines and passengers, and how much will not. The demand profile is used 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**.

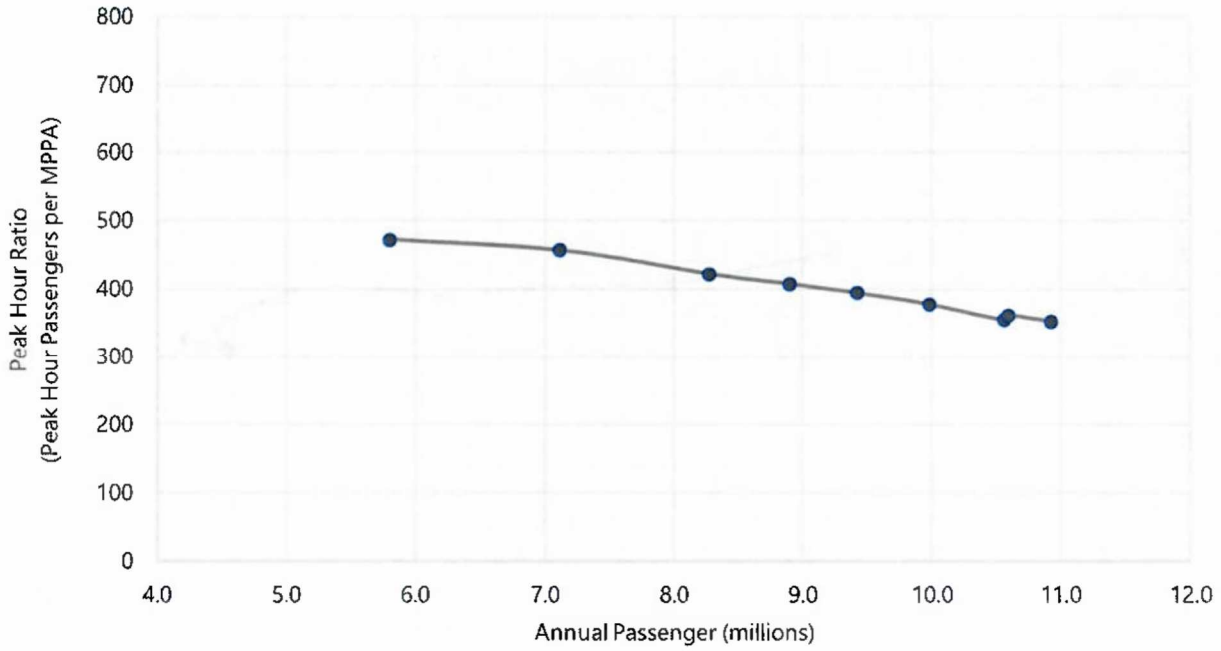
The relationship between the annual passenger volume and the peak hour is referred to in this report as the peak hour ratio. The ratios are used to convert peak hour capacity to a corresponding annual demand level that can be accommodated by the airport.

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)

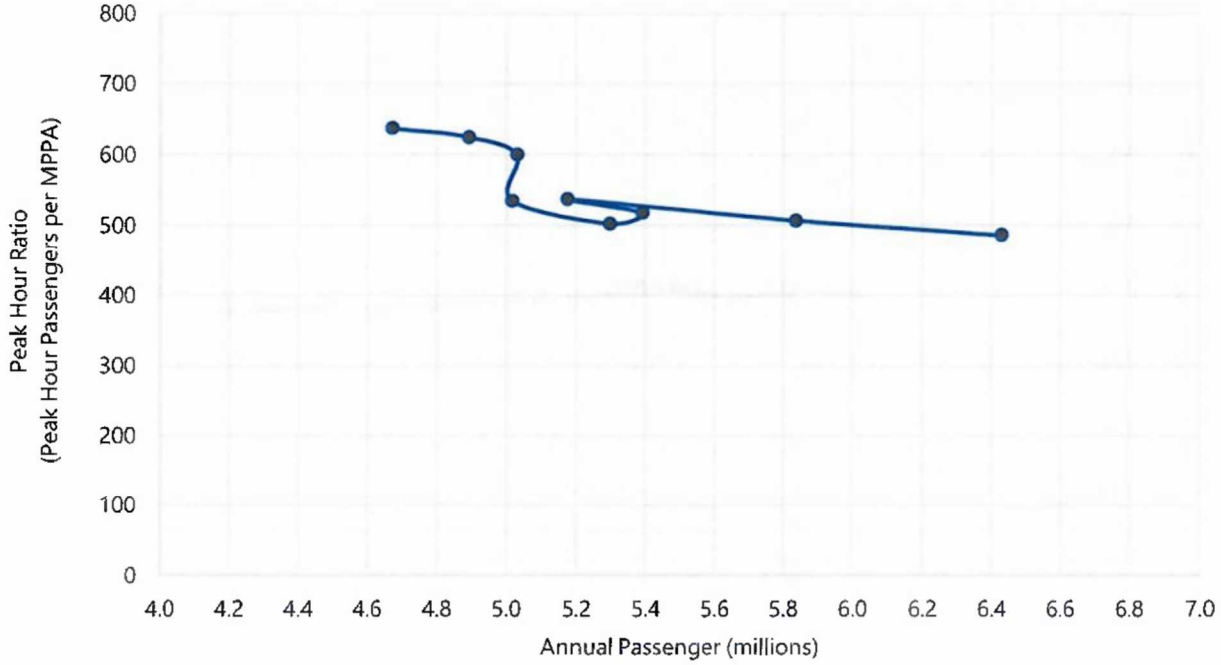
Exhibits 3.3 to 3.6 detail the resulting peak hour passengers per MPPA ratio for each of the nine years. **Exhibit 3.7** presents the peak day ratio, the 30th busy day for airport-wide departing passengers divided by the total annual airport-wide departing passengers per year. **Exhibit 3.8** presents 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



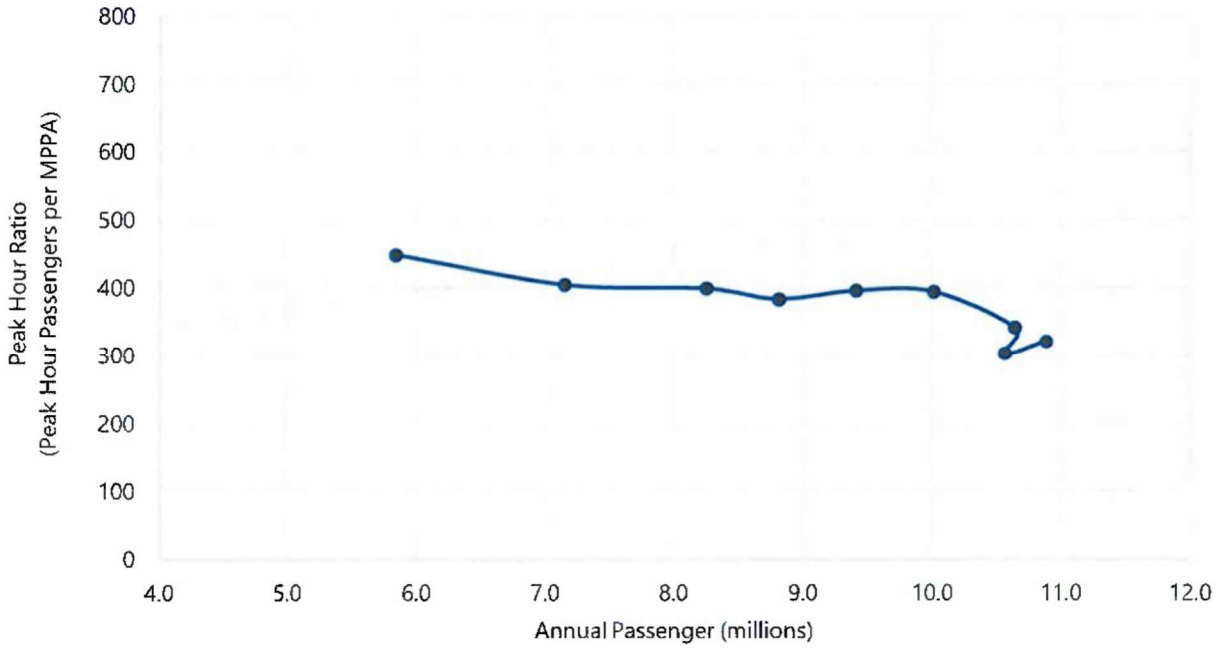
SOURCE: Ricondo, June 2026, analysis of Dublin Airport operations data. Exhibit A-3: Terminal 2 Originating – Historical Peak Hour to Annual Passenger Ratio

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



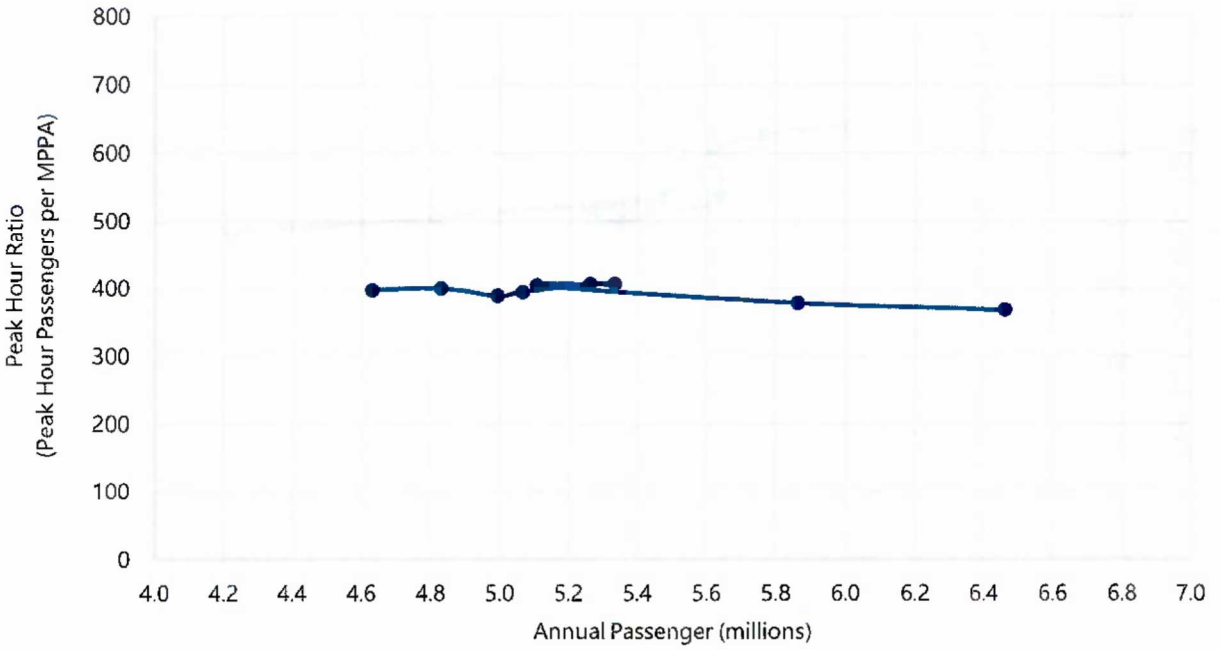
SOURCE: Ricondo, June 2026, analysis of Dublin Airport operations data.

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



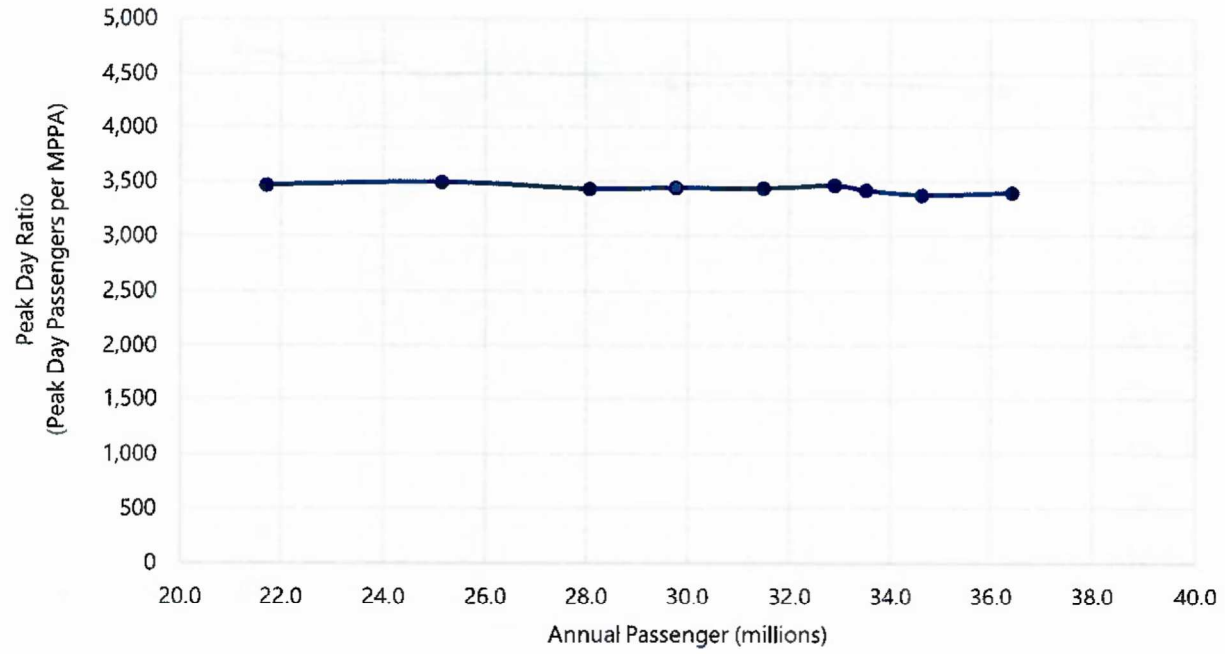
SOURCE: Ricondo, **June 2026**, analysis of Dublin Airport historical operations data.

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



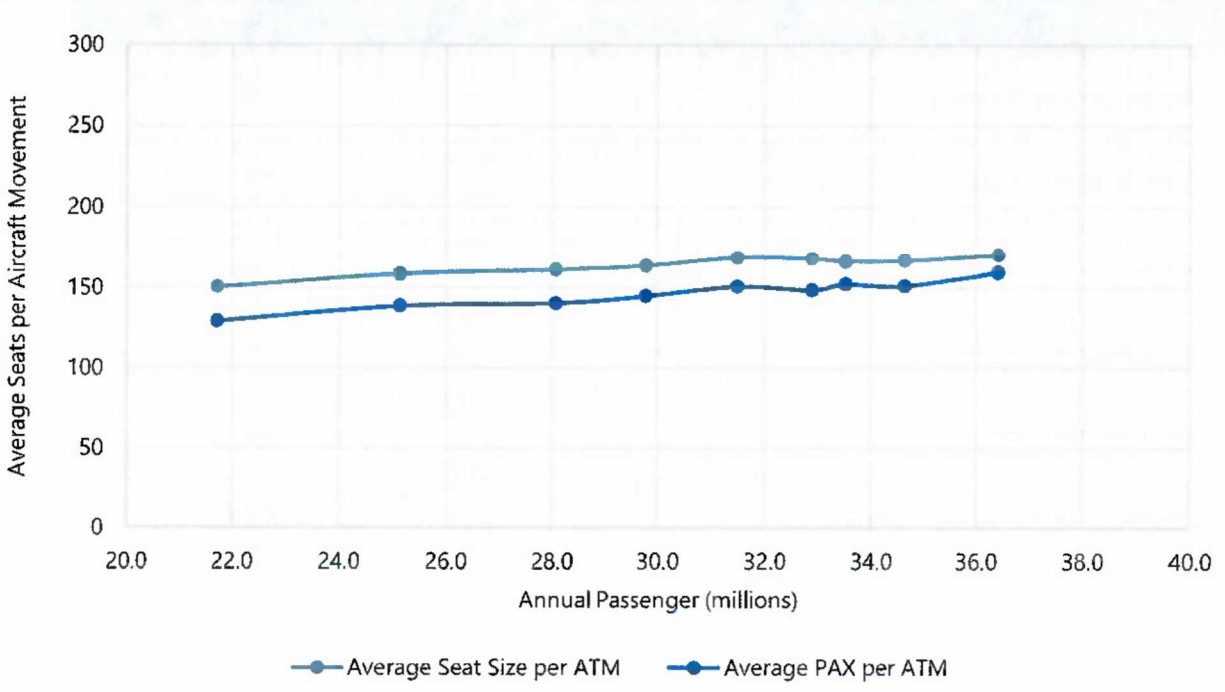
SOURCE: Ricondo, **June 2026**, analysis of Dublin Airport historical operations data.

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



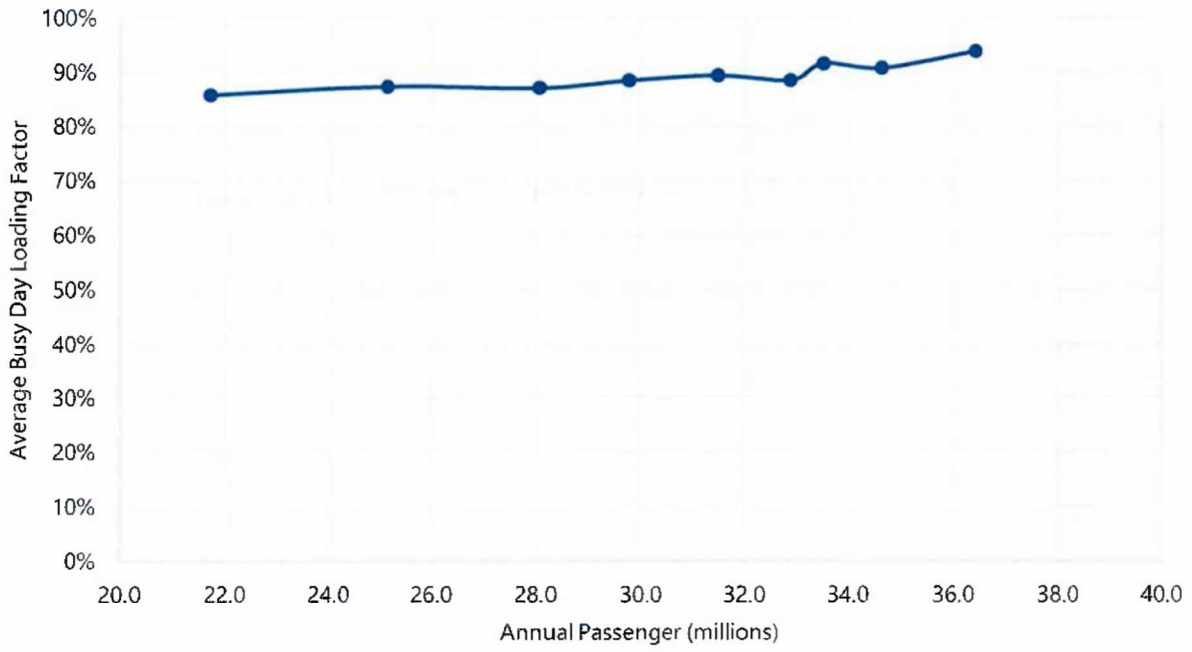
SOURCE: Ricondo, June 2026, analysis of Dublin Airport historical operations data.

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.

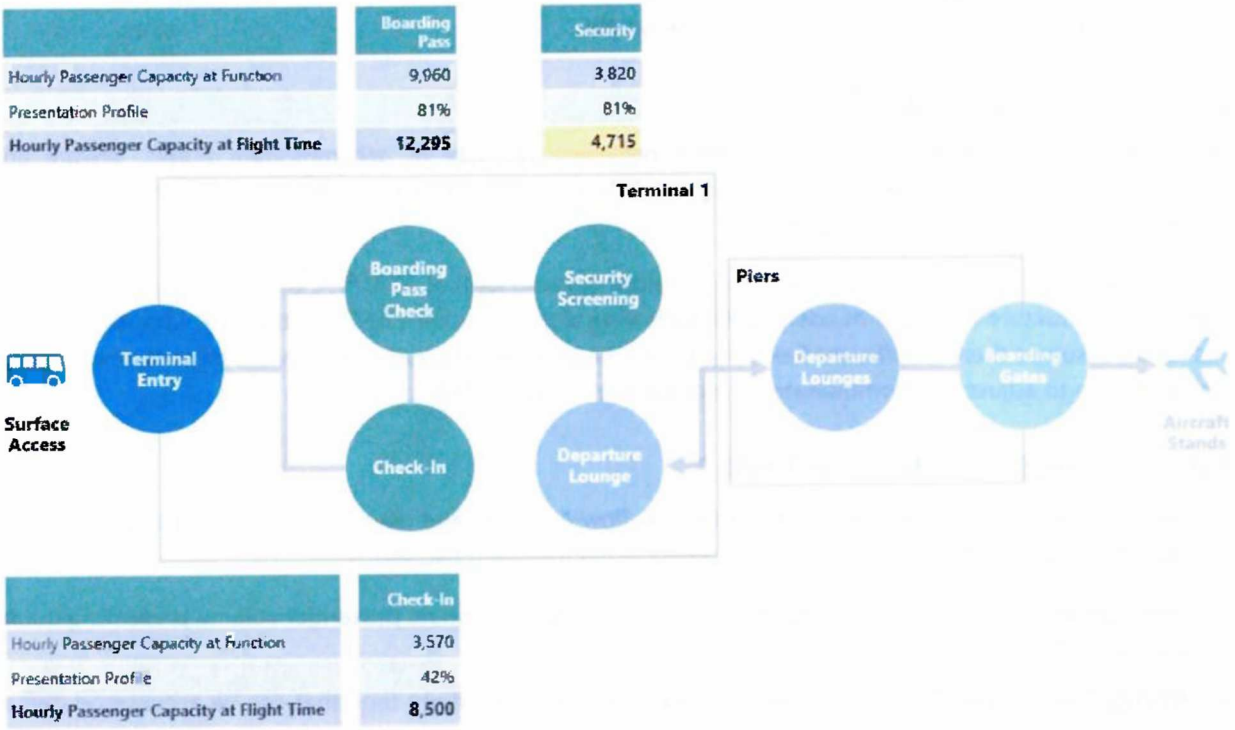
Peak hour capacity of each processing function is determined by an IATA ADRM methodology, which considers configuration, equipment, and operational characteristics. The corresponding peak hour capacity at scheduled flight departure time is determined by the proportional relationship represented by the 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



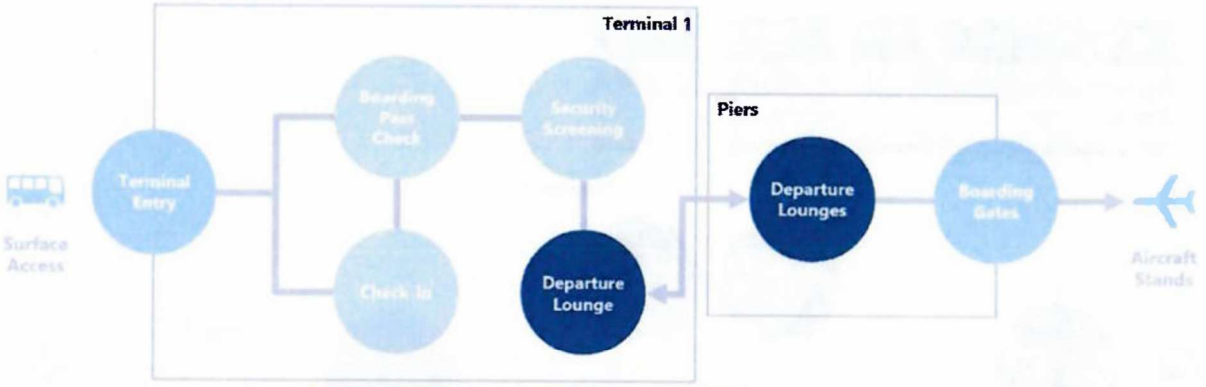
SOURCE: Ricondo, June 2026.

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



SOURCE: Ricondo, June 2026.

4.2.4 TERMINAL 2 DEPARTURES

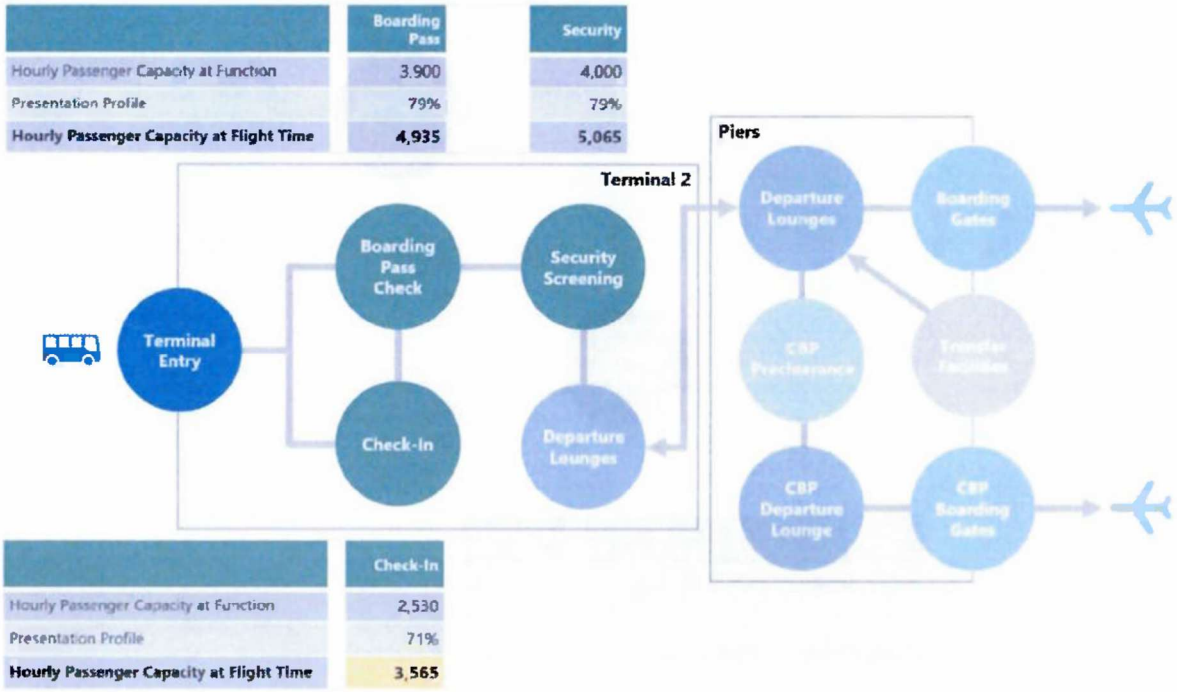
The Terminal 2 originating departures process consists of check-in, boarding pass verification, and security screening functions.

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



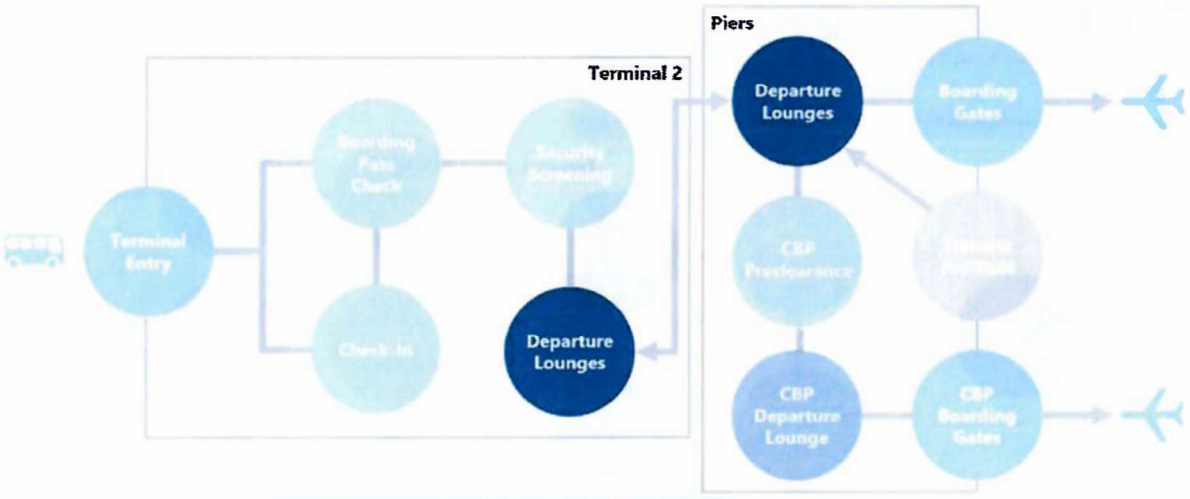
SOURCE: Ricondo, June 2026.

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

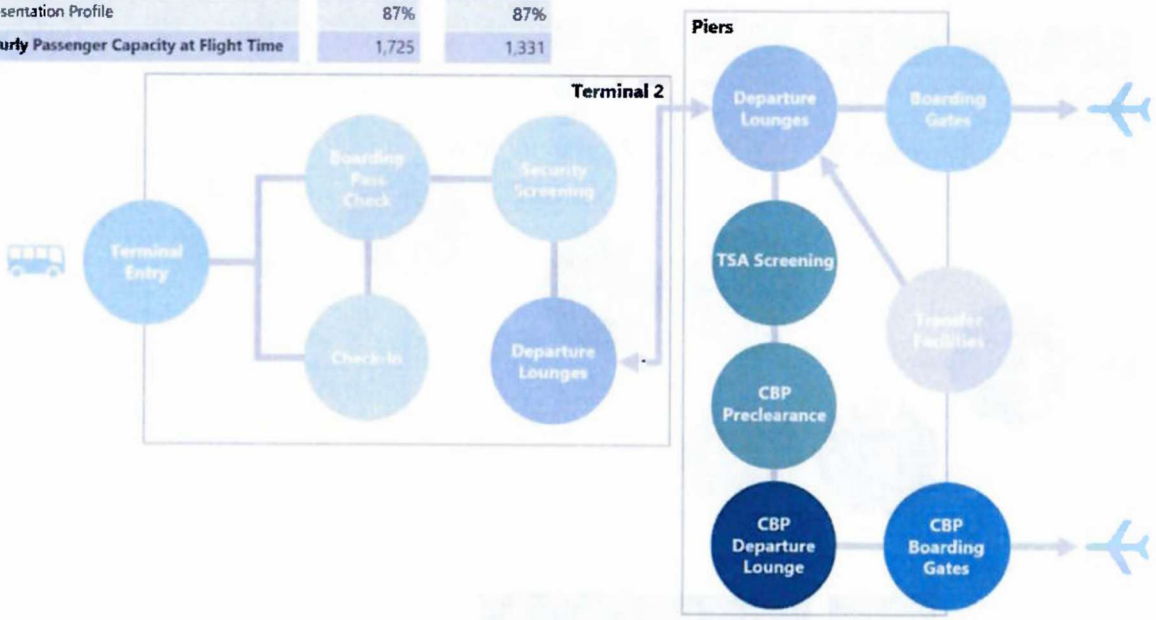
Passengers departing to the United States preclear U.S. CBP immigration before boarding in Dublin and arrive as domestic passengers at the destination airport. Passengers proceed from the Terminal 2 Departures Lounge to the CBP Preclearance facility in Pier 4. Following boarding pass and passport verification, 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.

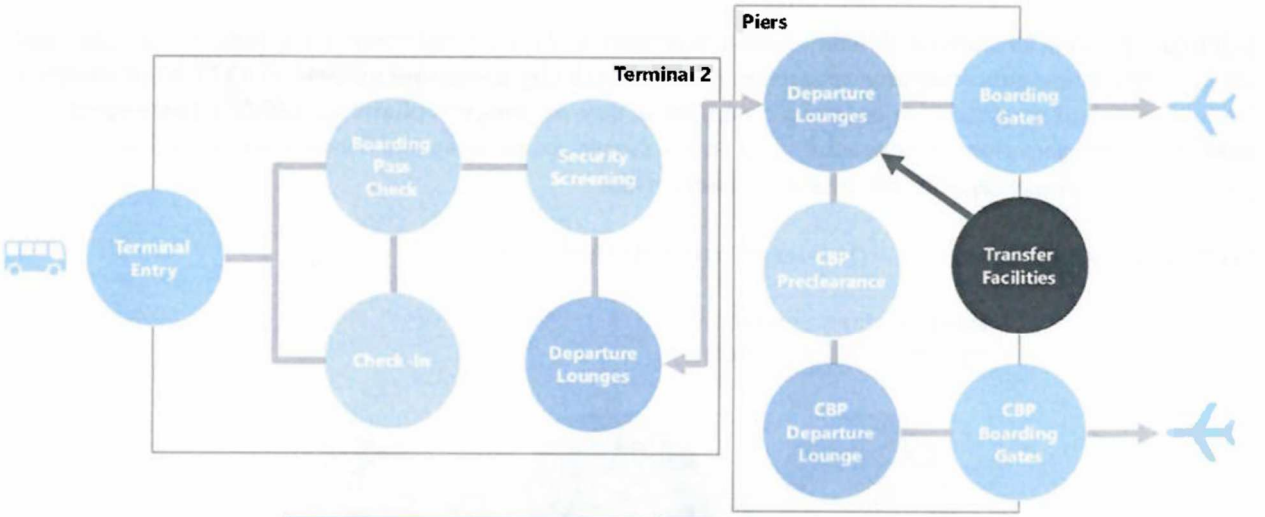
4.2.8 TERMINAL 2 TRANSFERS

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.

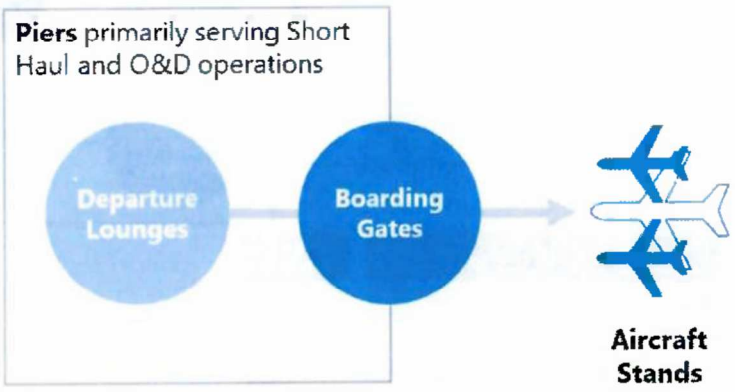
Assessing the capacity of gates and stands is complicated due to the distinct operational needs of different airlines and the level of common use across some of the available gate and stand inventory. For example, shared use of Pier 3 between Terminal 1 and Terminal 2 airlines, or shared use of remote 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.**

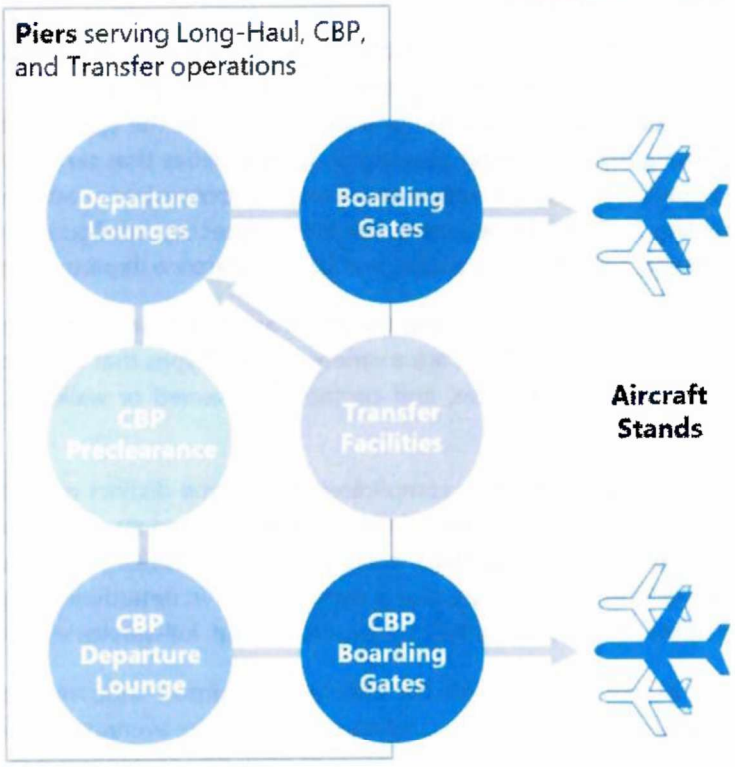
Exhibits 4.9 and **4.10** illustrate different operational types and the related connectivity required for gates and stands. The existing gate inventory can accommodate **a peak day passenger volume of 137,000 passengers**. The aircraft stand inventory can accommodate **a peak day passenger volume of 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**

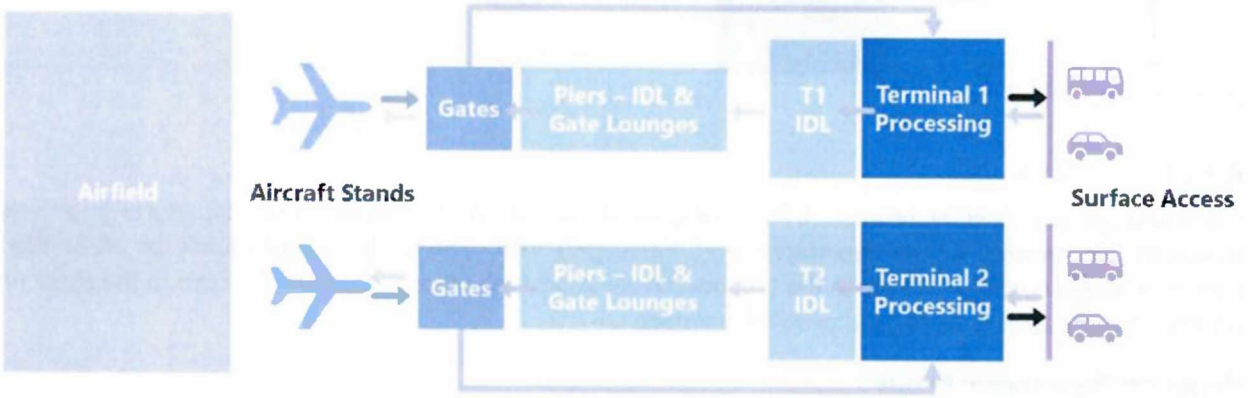
SOURCE: Ricondo, June 2026.
NOTES:
1/ Originating, terminating, transfer, and transit passengers
2/ Lowest of terminal, aircraft stands, and boarding gate capacities

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.

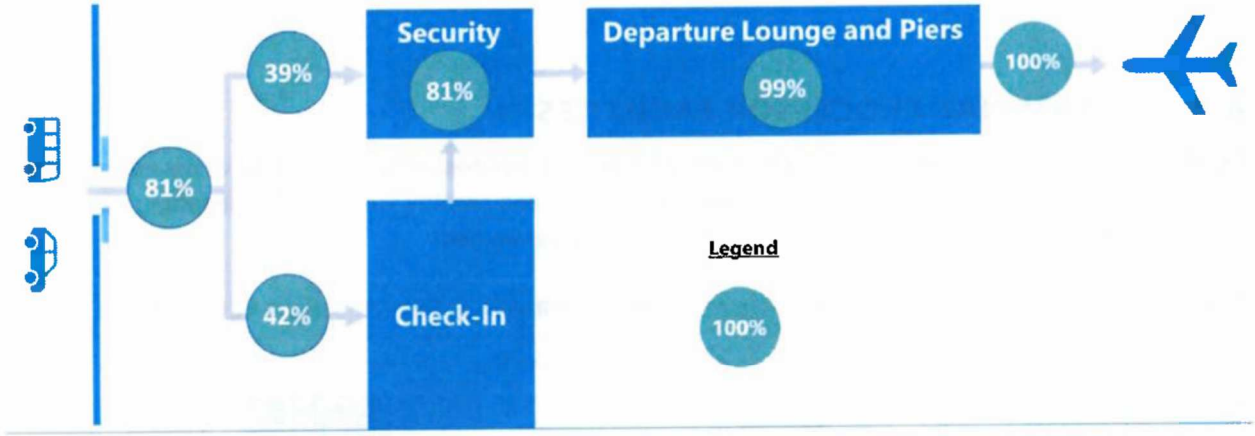
The following subsections provide an overview of the departing and arriving processing facilities for Terminal 1 and Terminal 2, and a summary of the corresponding peak hour capacity.

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.

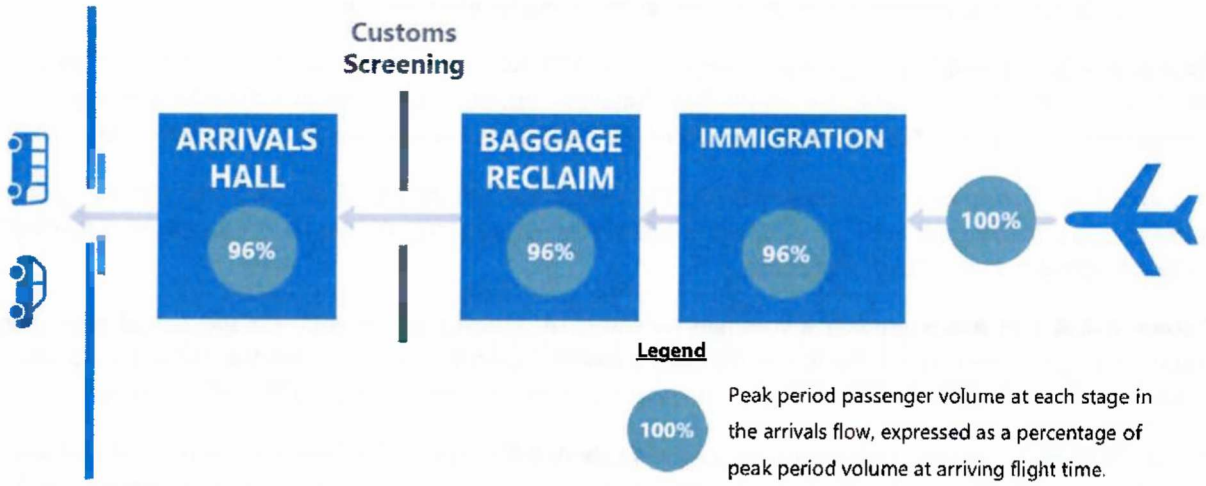
SOURCE: daa; Ricondo analysis, June 2026.

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 (1.3m² 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 (1.3m² 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 (1.3m² 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 (1.3m² 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**

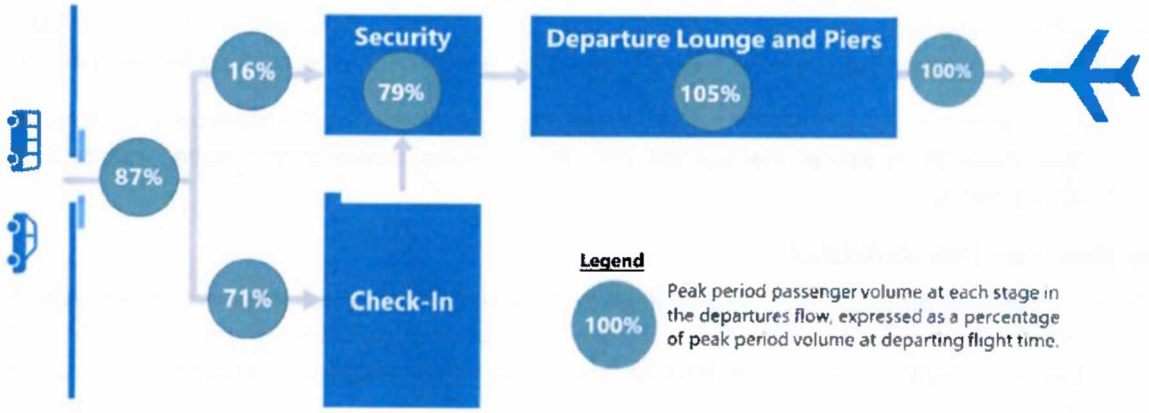
SOURCE: daa; Ricondo analysis, **June 2026**.
NOTES: 1/ No change from 2023 to 2026.

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.

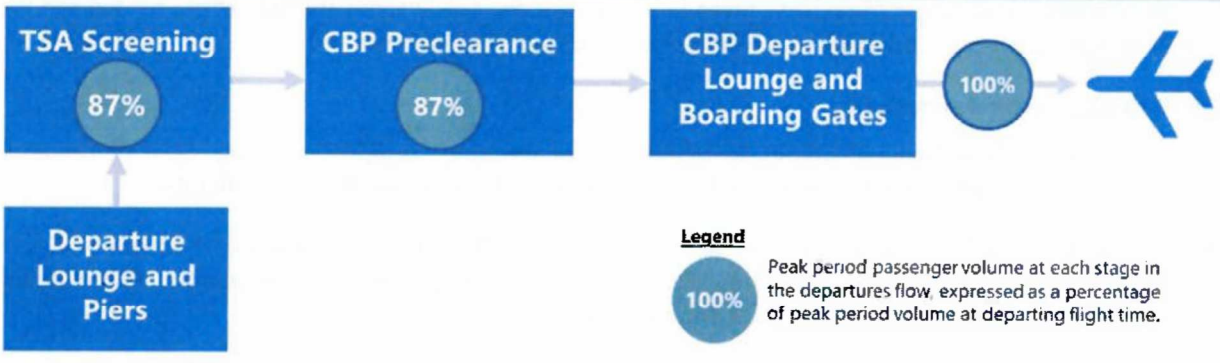
Dublin Airport operational data shows that the peak terminal entry volume is 87% of the peak passenger volume at flight departure time.

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.

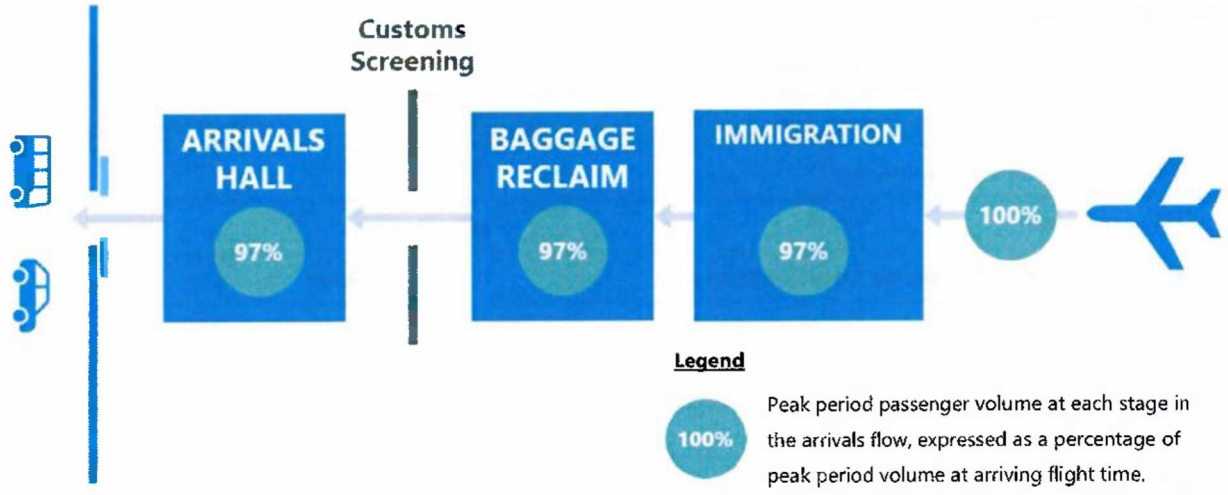
SOURCE: daa; Ricondo analysis, June 2026.

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 (1.3m² 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 (1.3m² 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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An Roinn Iompair
Department of Transport

2 November 2026

Mr. Nick Cole
Deputy Chief Executive
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Ministerial Direction
Section 6 of the Dublin Airport (Passenger Capacity) Act 2026

Dear Nick,

I refer to your application dated 5 August for the making of an Order to address the passenger cap planning condition at Dublin Airport. As you know, before I can make a final decision in relation to the making of an Order, An Coimisiún Pleanála (the Commission) must carry out the relevant environmental assessments.

On 11 September, I wrote to the Commission seeking a scoping opinion on the detail and scope for the Environmental Impact Assessment Report associated with the making of an Order. The Commission has now provided me with its opinion which I enclose.

In accordance with section 6(1)(b) of the Dublin Airport (Passenger Capacity) Act 2026, I am directing you to prepare an Environmental Impact Assessment Report which is consistent with the Commission's opinion and a Natura Impact Statement, and to submit both the Report and the Statement to me by Monday 16 November 2026.

Oifig an Aire Iompair Office of the Minister for Transport
Lána Líosain, Baile Átha Cliath, D02 TR60, Éire Leeson Lane, Dublin , D02 TR60
T +353 1 6041062 | minister@transport.gov.ie www.gov.ie/transport

On receipt of both documents, I will apply to the Commission for an Environmental Impact Assessment and an Appropriate Assessment to be carried out in relation to the making of an Order.

I will take the outcome of those assessments into account before making a final decision on any Order.

I look forward to hearing from you.

Yours sincerely,



_____

Darragh O'Brien TD

Minister for Transport