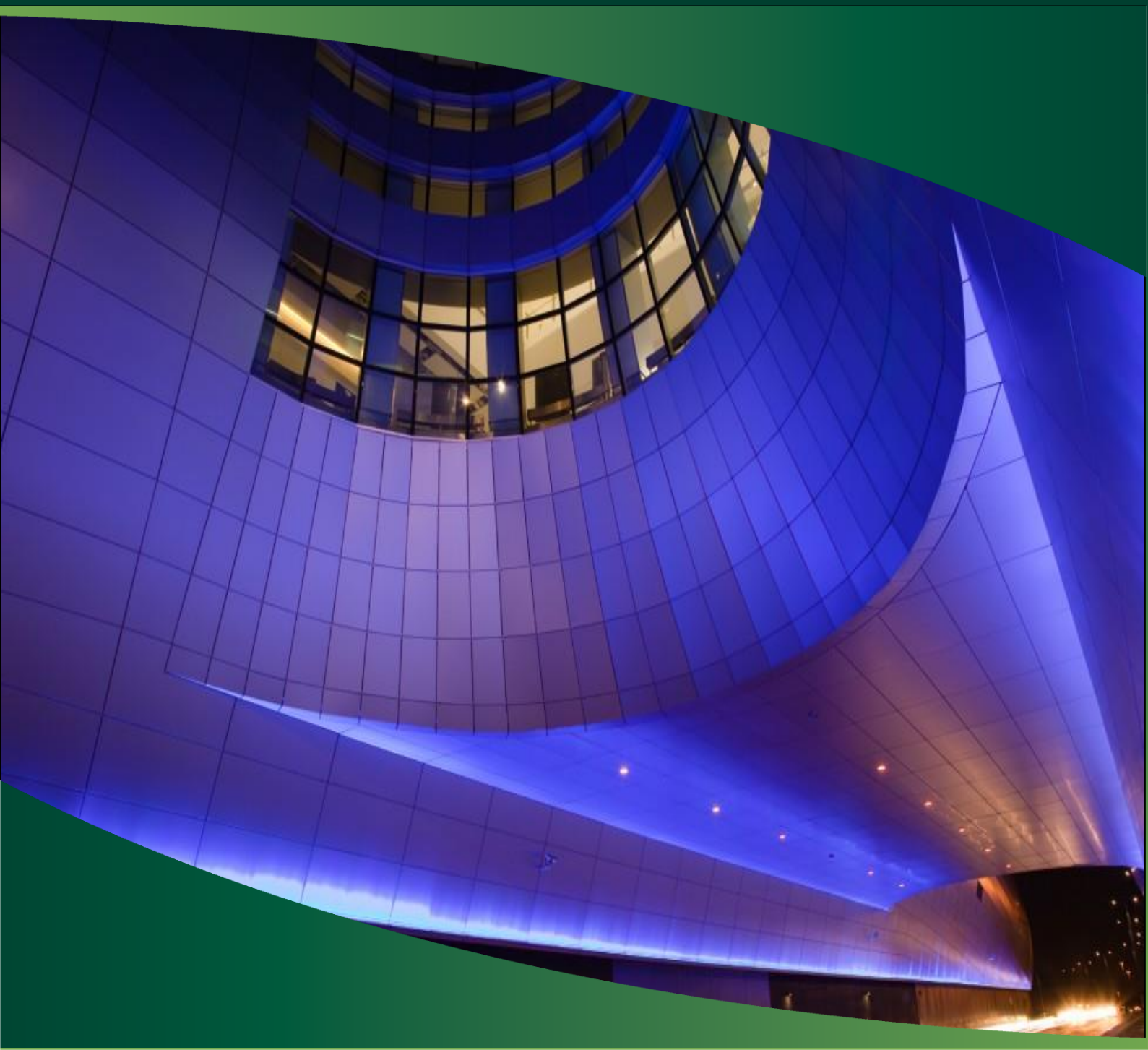
Dublin Airport Aeronautical Charges & Incentives

29 March 2026 – 27 March 2027

Proposal for Consultation

6 November 2025



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1. Introduction & Context

Purpose of this Consultation

1.1. Dublin Airport is required under the EU Airport Charges Directive (2009/12/EC) and the Aviation Regulation Act 2001 (as amended) to consult annually with airport users before setting or amending airport charges. This consultation provides airlines and other stakeholders with an opportunity to review and comment on the proposed structure and level of charges for the upcoming charging period.

1.2. The objective of this process is to ensure that charges are relevant, objective and transparent, while supporting the efficient operation and development of Dublin Airport. Feedback received during this consultation will inform the final schedule of charges, which will apply from 29 March 2026.

Regulatory Framework

1.3. Airport charges at Dublin Airport are subject to economic regulation by the Irish Aviation Authority (IAA), which acts as Ireland's Independent Supervisory Authority under the Airport Charges Directive. While the IAA sets a maximum price cap through periodic determinations, currently covering 2023–2026, Dublin Airport is responsible for setting individual charges within that cap following consultation with users.

1.4. The annual consultation process is designed to provide transparency on the basis for charges, including cost drivers and traffic forecasts, explain any changes to the structure of charges such as new incentives or environmental measures, and allow users to provide feedback on service quality, investment priorities, and operational performance.

Context for the 2026 Charges

1.5. The proposed charges for the upcoming period are being developed in the context of a rebound in passenger traffic growth, with volumes exceeding pre-pandemic levels. Operational performance has remained robust, with Dublin Airport meeting service quality targets such as security queue times and passenger satisfaction despite capacity pressures. Delivery of major projects under the 2022 Capital Investment Programme has been delayed due to planning processes. S25 has been a very successful season at the airport, with record volumes of traffic supported by improving levels of service quality. The current aero charging model is delivering successful outcomes for all stakeholders. Therefore, the high-level proposal for 2026 is to broadly continue with the current structure of aero charges, supported by further measures to minimise aircraft noise, particularly during the nigh-time period

Objectives of the Proposed Charges

1.6. The proposed schedule of charges aims to:

- ensure compliance with the IAA price cap for 2026,
- reflect efficient cost recovery for operating and maintaining airport infrastructure,
- support investment in capacity and service improvements,
- promote environmental sustainability through targeted initiatives, and
- maintain competitiveness to protect connectivity and passenger choice.

Structure of this Document

1.7. This consultation paper sets out an overview of expected 2026 price cap, the proposed charges for the upcoming period including the rationale, details of incentive schemes and consultation questions and next steps.

2. Price cap

2.1. The current expected 2026 price cap is €10.39. The increase is principally driven by adjusting the real price cap set in 2022 for inflation (CPI) and the addition of 2 Capex trigger projects, namely T1 Security to Mezz (B1), T1 Lounges (A2) & North Runway House Buyout (M3) and legislatively mandated opex costs.

$$P_{2026} = (€7.77 + Trigger_{2026} - QS_{2026})* (1+CPI_{HISTORIC}) * (1+CPI_{FORECAST}) + w_{2026} + Y_{2026} + k_{2026} + Z_{2026}$$

Table 1. 2026 Price Cap[1]

		2026	%
Base Price Cap		7.77	75%
Capex Triggers:			
North Runway (M2)		0.29	3%
T1 CS to Mezz (A1)		0.12	1%
Underpass		0.26	3%
Other Adjustments:			
CPI		1.60	15%
2024 under recovery (k)		0.21	2%
cost passthrough (w)		0.44	4%
Passenger outturn adjustment (y)		-0.03	0%
inflation correction (z)		-0.27	-3%
Expected Price Cap	**€**	**10.39**	

Triggers

2.2. Capex triggers applied are the North Runway (M2) (€0.29), T1 Security to Mezz (A1) (€0.12) & the West Apron Vehicle Underpass (A7) (€0.26). The West Apron Vehicle Underpass (A7) is a newly added capex trigger for 2026.

2.3. As of October 2025, the West Apron Vehicle Underpass project at Dublin Airport has entered its construction phase following the award of a €265 million contract to a joint venture between Sacyr Ireland Ltd and Wills Bros Ltd. This major infrastructure development will see the creation of a 1.1-kilometre twin-cell tunnel beneath Runway 16/34 and four taxiways, linking Pier 3 to the West Apron. The tunnel is designed to provide a dedicated route for airside vehicles such as fuel trucks, catering vans, and cargo transporters, eliminating the need for these vehicles to cross active runways and thereby improving safety and operational efficiency.

2.4. The project is a strategic response to operational constraints introduced by the opening of the North Runway, which restricted vehicle movements across Runway 16/34. Planning permission was initially granted by Fingal County Council in early 2023, upheld by An Bord Pleanála in 2024, and finally cleared by the Supreme Court in July 2025 after Ryanair's legal challenge was dismissed. The

[1] Indicative based on current estimates. Subject to change based on outturns.

tunnel is expected to be completed by August 2030 and forms a key part of daa's long-term infrastructure strategy to future-proof the airport's airside operations.

CPI

2.5. The CPI adjustment of €1.60 is applied using the latest CPI index published by the Central Statistics Office (CSO) and the latest IMF forecast[2] for 2026 as outlined in the Determination. CSO data and calculations are provided in Table 2.

Table 2. CPI Data

CPI	2026
February 2022	107.6
October 2025 (expected)	125.6
$CPI_{HISTORIC}$	16.7%
$CPI_{FORECAST}$	1.7%

Other adjustments (w2026, y2026, k2026, z2026)

2.6. w2025 and y2025 are cost-passthrough mechanisms that are intended for significant variances in legislatively mandated operating costs incurred by daa when compared to the Opex forecast used by the IAA in its Third Interim Review of the 2019 Determination on the Maximum Level of Airport Charges at Dublin Airport.

2.7. Fingal County Council (FCC) levy commercial rates on industrial property, FCC have increased these rates considerably based on the increase in valuation imposed by Tailte Eireann (the Valuation Office) which daa is disputing. To account for this, €0.29 has been applied through the cost pass-through mechanism.

2.8. €0.14 has also been applied to account for the increase in IAA security regulatory charge and the IAA aerodrome licence fee. This is materially higher than the adjustment applied for 2025 due to the newly introduced 'general passenger charge' introduced by the IAA[3].

2.9. y2025 corrects for passenger outturns with respect to the cost passthrough mechanism and accounts for -€0.03.

2.10. k2025 is €0.21 to account for the under-recovery during the period of 2024 as outlined within the daa plc 2024 Regulated Entity Accounts[4].

2.11. z2025 of -€0.27 is to correct for the difference in outturn and forecast inflation used for the 2024 price cap. It also corrects the February 2022 index used by the IAA as a proxy for the 2022 full-year index which overinflated the 2024 nominal price cap (€8.87) used in its Determination.

[2] World Economic Outlook - All Issues
[3] iaa-schedule-of-charges---schedule-2-cost-recovery-domains-and-general-passenger-charge.pdf
[4] 2024 Regulated Entity Accounts

3. Passenger Forecast

3.1. The passenger forecast for 2026 follows a constrained growth trend of 3% to 37.33mppa due to terminal and stand capacity. Slot filings, the latest load factor trends and cancellation rates have been used, as well as airline announcements to date.

3.2. We encourage users to discharge their requirements under S.I. 116 of 2011, whereby users must submit Dublin Airport the following information:

"(a) forecasts as regards their traffic there"

"(b) forecasts as to the composition and envisaged use of their fleet there;

"(c) their development projects there;"

"(d) their requirements there."

4. 2026 Proposed Airport Charges

Price cap and average charge comparison

4.1. Table 3 below outlines the increase in the expected price cap compared to the forecast average charge. daa is pricing airport charges below the expected price cap to support competitiveness and maintain affordability for airlines. While the IAA sets a regulatory ceiling, daa has discretion to set charges lower, reflecting market conditions, airline feedback, and strategic priorities such as route development. This approach also aligns with daa's broader commercial objectives and its commitment to balancing financial sustainability with stakeholder value. **The 2026 Aeronautical Revenue Budget summary is outlined in Appendix 2.**

Table 3. Expected price cap & average charge

	2025	*2026*	▲
Price Cap	**€9.40**	**€10.39**	**11%**
Average Charge	**€9.21**	**€10.03**	**9%**
Under recovery	**-2%**	**-4%**	**nm**

4.2. While the current indicative price cap is €10.39 is an 11% increase from 2025, daa is planning to minimise the year-on-year increase in charges by increasing the level of under recovery in 2026. Given the level of variability in forecasting assumptions if the average charge starts to trend above the 5% under recovery threshold, a mid-year charges consultation may be required. daa is therefore planning for an average charge of €10.03 which is 9% higher than the 2025 average charge, but remains 2% lower than the 11% YoY increase in the price cap.

5. Noise Charges

5.1. Noise emissions greatly affect the surrounding community of Dublin Airport. To incentivise a quieter and cleaner fleet use, noise charges were introduced in 2023[5]. Dublin Airport took a stepped

[5] See Terms & Conditions for QC Methodology

approach to noise charges where initially the surcharge has applied only at night-time hours. In 2024, the charging regime was ramped up to further mitigate against noisier fleet types being operated and to internalize the economic and social cost incurred by the local community. In 2025, Noise charges were restructured removing MTOW and replaced with a set fee per movement while increasing its share of total aeronautical revenue.

5.2. Charges are based on the Quota Count (QC) system, which assigns values to aircraft types according to their certified noise levels. These charges are further modulated by time-of-day, with higher fees applied during night-time operations to discourage the use of noisier aircraft during sensitive periods. This structure ensures that charges are objectively linked to the environmental impact of aircraft operations.

5.3. An Coimisiún Pleanála ("ACP") in their Final Decision on nighttime flights in Dublin Airport in accordance with Section 37(4) of the Planning and Development Act 2000 imposes an annual noise quota of 16,260 as well as an annual night movement cap of 35,672. To aid compliance, runway charges must be consistent with staying below this noise quota and movement cap.

5.4. To achieve the desired outcomes outlined above and following the ACP Decision, daa propose a rebate for quieter aircraft of QC 0.25 and below to further incentivise a quieter fleet use. Moreover, aircraft of QC 0.5 and above will have noise charges increased year-on-year, differentiated by Day/Night as outlined in Table 4. To receive this rebate, airport users must be in compliance with all other payment terms as outlined in the 2026 Airport Charges Terms & Conditions.

Table 4. Proposed Noise Charges

	2025		*2026*		▲	
QC	Day	Night	Day	Night	Day	Night
0.125	€0	€0	-€75	€0	-€75	€0
0.25	€0	€0	-€50	€0	-€50	€0
0.5	€0	€150	€0	€200	€0	+€50
1	€300	€600	€400	€800	+€100	+€200
2	€400	€800	€500	€1000	+€100	+€200

Q1. Do you support the proposed structure of noise charges? If not, how should daa discharge our operational obligations through the application of noise charges?

6. Runway Charge

6.1. In response to the ACP Final Decision on nighttime flights at Dublin Airport, it is proposed a higher runway charge rate is levied year-round during nighttime hours as defined in the ACP Final Decision (2300-0700).

6.2. The imposition of differentiated runway charges during night-time operations at Dublin Airport is a necessary and proportionate measure to support objectives, ensure regulatory compliance, and maintain the financial sustainability of airport infrastructure. This justification draws on the regulatory framework established by the Aircraft Noise Competent Authority (ANCA), the final decision of An Coimisiún Pleanála (ACP), and the principles of cost recovery and modulation

embedded in EU and national aviation policy.

Regulatory Context

6.3. Dublin Airport is subject to stringent noise management obligations under the Aircraft Noise (Dublin Airport) Regulation Act 2019 and Regulation (EU) No. 598/2014. ANCA, as the designated competent authority, has set out a Noise Abatement Objective (NAO) requiring that the number of people exposed to harmful noise levels at night (above 55 dB Lnight) must not exceed 2019 levels.

6.4. To operationalise this, ACP's final decision introduced a dual regulatory mechanism: an annual cap of 35,672 night-time aircraft movements and a Noise Quota System (NQS) that limits the cumulative noise impact based on aircraft type and performance. These measures are designed to protect residential amenity while allowing for sustainable airport growth.

> **Q2.** Do you support differentiated Day/Night runway charge rates? If not, how should Dublin Airport differentiate Day and Night airport charges?

7. Cost Allocation and Regulatory Compliance

7.1. Dublin Airport operates under the regulatory framework established by the EU Airport Charges Directive (Directive 2009/12/EC), which mandates transparency, consultation, non-discrimination, and cost-relatedness in the setting of airport charges. The Irish Aviation Authority (IAA), formerly the Commission for Aviation Regulation, oversees the implementation of these principles through price cap regulation and stakeholder engagement. This paper outlines how Dublin Airport's charges are cost-related, mapped to specific cost categories, and aligned with the Directive's requirements.

7.2. The Airport Charges Directive applies to airports with over five million passengers annually and requires that charges be transparent, non-discriminatory, and reflective of the costs incurred in providing airport services. In Ireland, the Directive is transposed through S.I. No. 116/2011, and the IAA is responsible for ensuring compliance. Charges are reviewed periodically based on operating and capital expenditure forecasts, passenger volumes, and service quality metrics[6].

7.3. Each charge levied by Dublin Airport is linked to a specific cost category and justified by regulatory principles. The following table summarises the cost basis and regulatory compliance for each charge:

Table 5. Cost Allocation

Charge Type	*Cost Category*	*Regulatory Principle*
Runway Movement Charge	Runway Infrastructure & Operations	Cost-Reflective, Non-Discriminatory
Passenger Service Charge	Terminal Services & Security	Transparent, Linked to Service Provision
Aircraft Parking Charge	Stand Occupancy & Time-Based Usage	Usage-Based, Objective
Airbridge Charge	Airbridge Infrastructure	Usage-Based, Objective
Transfer Passenger Charge	Terminal & Security for Transfers	Targeted to Specific User Group

[6]Service Quality YTD performance provided in Appendix 3

PRM Charge	Assistance Services for Reduced Mobility	Mandated by EU Law, Cost-Based
Fast Track Charge	Dedicated Security Lane & Staffing	Voluntary, Service-Specific
Noise Charges	Noise Emissions	Under Review, Transparency-Oriented

Noise Charges: Compliance with the Thessaloniki Forum and the EU Airport Charges Directive

7.4. Noise-related charges are a critical component of environmental regulation at airports, serving both to mitigate the impact of aircraft operations on surrounding communities and to incentivise the use of quieter, more sustainable aircraft. Dublin Airport has adopted a structured and transparent approach to noise charging that aligns with both the Thessaloniki Forum of Airport Charges Regulators' recommendations and the EU Airport Charges Directive (Directive 2009/12/EC).

7.5. The Thessaloniki Forum promotes best practices in the economic regulation of airport charges, particularly in the area of environmental modulation. Dublin Airport's noise charges are designed to be relevant, objective, transparent, and non-discriminatory.

7.6. Transparency and stakeholder engagement are central to Dublin Airport's charge-setting process. Annual consultations are conducted with airport users, ensuring that all stakeholders have the opportunity to review and comment on proposed charges. The methodologies and rationale behind the charges are published in consultation documents, supporting the Forum's call for openness and accountability.

Airport Charges Directive

7.7. Directive 2009/12/EC establishes a framework for the setting of airport charges across the European Union. Dublin Airport's approach to noise charging complies with the Directive's core principles: transparency, consultation, non-discrimination, and cost-relatedness.

7.8. Under the Directive, airports are required to consult regularly with users and provide detailed information on the basis for charges. Dublin Airport meets this requirement through its structured annual consultation process, which includes the publication of aeronautical charges proposals and the incorporation of stakeholder feedback.

7.9. The Directive also permits the modulation of charges for environmental purposes. Dublin Airport's use of QC values and time-of-day adjustments, exemplifies this principle. These charges are applied uniformly based on aircraft characteristics, ensuring non-discriminatory treatment of all operators.

7.10. Oversight of Dublin Airport's charges is provided by the IAA. This regulatory body ensures that charges are cost-related and comply with national and EU legislation.

National Implementation of Legal Framework

7.11. Ireland has implemented the EU regulatory framework through the Aircraft Noise (Dublin Airport) Regulation Act 2019. This legislation designates Fingal County Council as the Aircraft Noise Competent Authority (ANCA), responsible for monitoring, assessing, and enforcing noise-related measures at Dublin Airport.

7.12. ANCA oversees the development and implementation of the Dublin Airport Noise Action Plan,

which aligns with Regulation (EU) No. 598/2014 and the ICAO Balanced Approach. The plan includes provisions for noise monitoring, mitigation, and stakeholder engagement, reinforcing the legal and procedural basis for noise-related charges.

7.13. The Act also enables the imposition of levies to fund noise regulation activities, ensuring that the costs of environmental management are appropriately recovered and transparently allocated.

Table 6. Summary of Noise Charges Compliance

Principle	*Thessaloniki Forum*	*EU Airport Charges Directive*	*Dublin Airport Implementation*
Transparency	Methodologies and rationale must be published	Airports must publish basis for charges	Annual consultation documents published; rationale for charges disclosed
Consultation	Stakeholder engagement is essential	Regular consultation with airport users required	Annual consultation process facilitated by daa
Environmental Modulation	Charges should incentivise quieter and cleaner aircraft	Charges may be modulated for environmental purposes	QC-based charges, time-of-day modulation,
Non-Discrimination	Charges must be applied fairly across users	Charges must not discriminate among users	Charges applied uniformly based on aircraft type and noise certification
Legal Framework & Oversight	Recommendations adopted by national regulators	Directive transposed into national law	Aircraft Noise Regulation Act 2019; oversight by ANCA and IAA
Monitoring & Enforcement	Not explicitly covered	Required under Regulation (EU) No. 598/2014	Noise Action Plan 2024–2028; ANCA responsible for monitoring and enforcement

Runway Movement Charge: Compliance with the Thessaloniki Forum and the EU Airport Charges Directive

7.14. Differentiated runway charges at night ensures that all operators contribute to the cost of noise mitigation, regardless of aircraft type, while maintaining the incentive structure that penalises noisier aircraft through higher QC-based charges.

7.15. The introduction of a differentiated runway charges for night-time operations at Dublin Airport is a necessary and proportionate measure to support the airports objectives, ensure regulatory compliance, and maintain the financial sustainability of airport infrastructure. This measure is grounded in the principles of the EU Airport Charges Directive (2009/12/EC), the Thessaloniki Forum recommendations, and national regulatory decisions, including those of the Aircraft Noise

Competent Authority (ANCA) and An Coimisiún Pleanála (ACP).

7.16. Under the Aircraft Noise (Dublin Airport) Regulation Act 2019, ANCA is responsible for ensuring that noise-related operating restrictions at Dublin Airport comply with Regulation (EU) No. 598/2014. In its regulatory decision, ANCA established a Noise Abatement Objective (NAO) that requires the number of people exposed to harmful night-time noise levels to remain below 2019 levels.

7.17. In July 2025, ACP issued a final decision that introduced two key restrictions on night-time operations:

- An annual cap of 35,672 aircraft movements between 2300 and 0700 (Night Movement cap).
- A Noise Quota System (NQS) based on Quota Count (QC) values, which assigns higher scores to noisier aircraft and limits cumulative noise exposure.

7.18. These restrictions are designed to balance the airport's operational needs with the protection of residential amenity and public health.

7.19. The Thessaloniki Forum of Airport Charges Regulators recommends that modulation of airport charges be:

- Relevant to environmental objectives.
- Objective, based on measurable criteria such as aircraft noise certification.
- Transparent, with clear methodologies and stakeholder consultation.
- Non-discriminatory, applying fairly across users.

7.20. The Airport Charges Directive (2009/12/EC) establishes a framework for setting airport charges, emphasizing:

- Transparency: Airports must disclose the basis for charges.
- Consultation: Regular engagement with airport users is required.
- Non-discrimination: Charges must be applied fairly.
- Cost-relatedness: Charges should reflect the cost of services provided.

7.21. The differentiated runway charge at night supports these principles by:

- Being relevant due to Night Movement Cap.
- Indirect social costs for night-time operations, allocated on usage driver basis.
- Maintaining fairness and transparency, as the charge is applied uniformly and subject to annual consultation with users.
- Supporting objectives, consistent with the Directive's allowance for modulation of charges for environmental reasons.

7.22. The implementation of a differentiated runway charge for night-time operations at Dublin Airport is a proportionate and necessary measure that aligns with both European and national regulatory

frameworks. It reinforces the objectives set out by ANCA through the Noise Abatement Objective and supports compliance with the planning conditions imposed by An Coimisiún Pleanála, including the night movement cap and the Noise Quota System. By ensuring that all night-time aircraft movements contribute to the costs associated with operating and mitigating noise during sensitive hours, the charge upholds the cost-relatedness principle in the EU Airport Charges Directive. Furthermore, it reflects the Thessaloniki Forum's guidance on modulation by applying objective, transparent, and non-discriminatory criteria to incentivise quieter aircraft and discourage unnecessary night-time operations. In doing so, the charge promotes sustainable airport growth, protects community well-being, and ensures the efficient use of limited night-time capacity, while maintaining the financial viability of essential airport services.

8. Fast Track

8.1. Dublin Airport currently offers a Fast Track security service as a differentiated facility under the Airport Charges Directive (ACD) and the European Communities (Dublin Airport Charges) Regulations 2011. These provisions allow airports to apply differentiated charges for premium services, provided such differentiation is transparent, objective and relevant.

8.2. Under the ACD, access to differentiated services must be open to all carriers on a non-discriminatory basis. Where demand exceeds the available capacity of a facility, access may be rationed, but only through relevant, objective, transparent, and non-discriminatory criteria. This requirement is reflected in Regulation 11(3) and 11(4) of the 2011 Regulations.

8.3. Over the past two years, Dublin Airport proposed changes to Fast Track Terms & Conditions to address capacity issues caused by some users offering ever-increasing wholesale Fast Track access. These users have objected to such restrictions. Dublin Airport are continuing to work on a mechanism to implement necessary changes to manage this capacity issue.

8.4. In 2025 Dublin Airport installed eGates to streamline and enhance the passenger experience for Fast Track. In order to enable the correct and efficient operation of these eGates and optimal capacity monitoring daa would remind airlines as per the Terms & Conditions which came into force in 2025 but have not yet received full compliance from airlines; requires airlines to use minimum of IATA Version 5 barcode and enable the Fast Track Indicator (Y/N)[7].

8.5. The 2025 wholesale charge was based on a cost relativity exercise and formed the basis for its justification. While cost relatedness is not compulsory under the ACD for differentiated services, it is one of the measures which it can be justified against in accordance with relevance, objectivity, transparency and non-discrimination. Consistent with the approach of continuing the cost relative charge, in 2026 a detailed review of the wholesale Fast Track charge will be undertaken. This will consider the costs involved in T1 Fast Track to the Mezz as-well as the new C3 and body scanners introduced in T2. A glidepath of charge increases is anticipated to be applied in the coming years given the additional costs faced in providing the Fast Track service. As part of this glidepath to smooth the price increase, for 2026 the charge is proposed to increase to circa €1.13. In compliance with the ACD and the IAA Final Decision on Ryanair complaint on Airport Charges at Dublin Airport this uplift is objective as it reflects the cost of providing the service which has increased post the FT to the Mezz Project (3.38), it is transparent as it is based on the analysis of wholesale costs which now also reflects the FT to the Mezz Project (3.9) and it is relevant as it has regard to all costs associated with providing of wholesale Fast Track.

[7] See 3.7 of Terms & Conditions for more detail.

8.6. The Fast Track to the Mezz T1 project will provide a capacity of 3 lanes while T2 Fast Track is allocated 1 lane with hourly capacity of circa 320 trays.

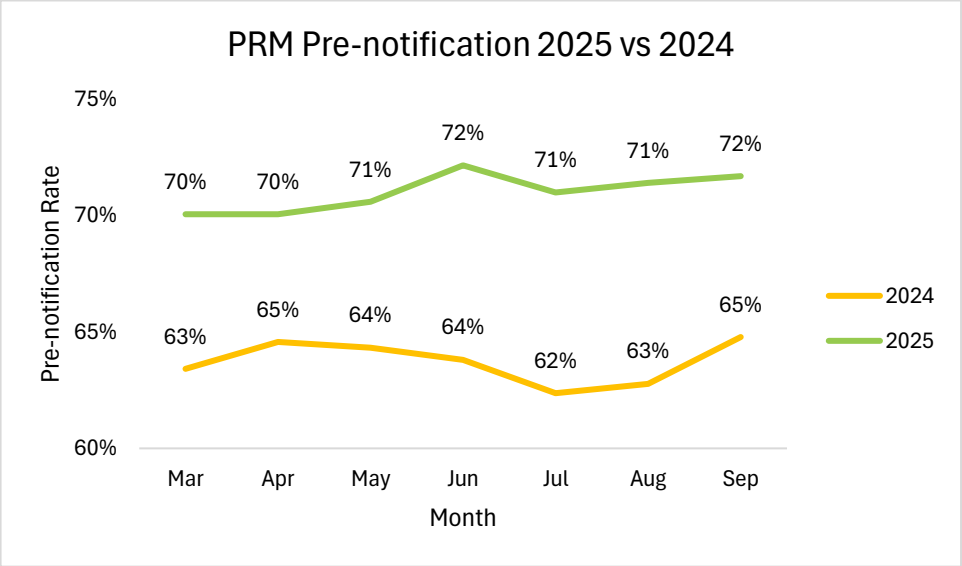
> **Q3.** What objective and transparent criteria should be applied for capacity management if demand for Fast Track exceeds capacity?
>
> **Q4.** Would a quota-based allocation system be an appropriate mechanism to manage capacity constraints in Terminal 2?

9. PRM

9.1. As part of the 2025 Airport Charges Consultation, a significant change to the charging structure for passengers with reduced mobility was proposed and implemented. From March 2025, a three-band system took effect, linking the charge to the level of pre-notification achieved by airlines to encourage improved operational efficiency and reduce delays caused by last-minute PRM requests. Pre-notification must occur at least 48 hours before departure to qualify for the rebate which is aligned with EU Regulation (EC) No 1107/2006.

9.2. Prior to this structural change, only 64% of PRM passengers were pre-advised on average in Summer 2024, with no airline achieving more than 80%. In Summer 2025, the pre-notification jumped to 72% demonstrating a response to the new charging structure. daa has been pleased to see the increase in pre-notification performance and that the charge structure did indeed incentivise behavioral change consistent with Article 3 of the ACD.

Figure 1. PRM pre-notification S25 vs. S24



9.3. Some airport users have raised issue with the tiered PRM charging system, as PRM charges are supposed to be based on pure cost recovery, not behavioural incentives. They claim the system fails to incentivise pre-notification since Dublin Airport and its service provider, OCS, continue to facilitate walk-up requests, undermining any obligation to pre-notify.

9.4. It is also claimed that airport users cannot verify pre-notification rates and also alleged that daa's data is flawed, as it includes inbound bookings and ignores pre-notifications made at other airports. It is suggested that higher pre-notification rates should be achieved by refusing service to non-pre-notified passengers.

9.5. EC1107/2006 does not prohibit modulation for behavioural change e.g. increase pre-notification as long as charge adheres to cost-relatedness, non-discriminatory and solidarity principle. Each airline in 2025 was billed according to their total departing passenger numbers and pre-notification rate, with similar incentive scheme in place in airports like Gatwick, Brussels and Hannover. daa would highlight it cannot refuse walk-ups as per EC1107/2006 it must make all reasonable efforts to accommodate them.

9.6. The restructure of PRM charges has increased pre-notification rates particularly through getting users with legacy software to update their dataflow systems to enable increased pre-notification and has achieved the intended purpose. daa is nonetheless also cognisant of airline input; since the charge has come into effect, some users have expressed the view that walk-up rates cannot be influenced. daa therefore invites users to indicate the preferred option below:

a. A single PRM charge, removing banded rates.

9.7. Maintaining the current structure which rewards higher pre-notification. Table 7 displays the proposed PRM charges for both options *a* and *b*. Both options have been drafted in accordance with EC1107/2006 being cost-related, applying the user pay and non-discriminatory principles. Option *b* imposes reward and penalty consistent with the user pay principle whereby pre-notification is rewarded and short-notice or no notification is penalised accounting for the additional resource strain and complexity the latter entails. The PRM charge increase is driven from the 2025 PRM tender cost model, which will be consulted on in the AOC subcommittee working group on PRM.

Table 7. PRM cost recovery

Structure	€
Single Rate	1.05
>80% pre-notification	0.95
70%-80% pre-notification	1.05
<70% pre-notification	1.15

Q5. Should daa continue with the current PRM charge structure, or revert to the single PRM charge rate?

10. Incentives

10.1. All growth-related incentive schemes at Dublin Airport were suspended as part of the 2025 Airport Charges Consultation. This decision was linked to the ongoing passenger cap of 32 million, which limits daa's ability to incentivise traffic growth despite some legal developments around slot coordination. Previously, Dublin Airport offered incentives such as new route discounts, seasonal route support, and transfer traffic rebates. However, for 2025, no new growth incentive applications were awarded. The rationale was to ensure compliance with planning conditions and regulatory obligations while litigation on capacity limits continues.

10.2. Despite legal developments on slot coordination and the Irish Government proposing new legislation to address the passenger cap there is still uncertainty on these planning restrictions, given they are still caught up in the litigative process. Consistent with the Dublin Airport 2025 Charges Decision growth incentives remain suspended as the 32mppa terminal cap has not formally been amended.

10.3. Moreover, planning constraints are, compounded by near-term physical and operational capacity of the airport infrastructure. Terminals, security screening areas, stands, and runway slots are already operating near their practical limits during peak periods, creating congestion and reducing service quality. Introducing growth incentives in this context would exacerbate these pressures, leading to longer queues, increased delays, and a diminished passenger experience. Therefore, regrettably Dublin Airport in 2026 must also proceed with ceased growth incentives.

The following growth incentives remain suspended:

- New Route Support Scheme – Long and Short Haul (RSS)
- Significant Additional Capacity on Existing Routes (SACER)
- Grow Transfer Incentive Scheme (GTIS)

The Capacity Optimisation Incentive Scheme, Long-haul remote discount scheme & Standby aircraft scheme will remain in place[8].

11. Terms & Conditions

11.1. Minor changes to Section 4 are proposed to facilitate a more efficient billing and collections process. The proposed changes have a minimal impact on the services provided by Dublin Airport to airport users. A summary is provided below with references to the relevant section of the proposed 2026 Terms & Conditions which has been published alongside this document.

Financial

11.2. daa proposes an updated to Section 4.4 to give clarity on the use of customer portals. daa will no longer participate in any activity associated with customer platforms or portals.

Required Business Data

11.3. The introduction of an administrative charge for non-use of the Loop platform in respect of Aircraft Fleet Declaration is proposed. All stakeholders have worked together on an aircraft database to gather Aircraft Fleet data, which has led to efficiency gains in billing and collections.

11.4. While most users have migrated their systems, daa has facilitated some airlines who do not use RDC/Loop. However, this has become unsustainable and an administrative burden.

11.5. To account for the additional administration cost of being 'off-system', a fee per aircraft is being

[8] Incentive Schemes | Regulatory and Planning| Dublin Airport

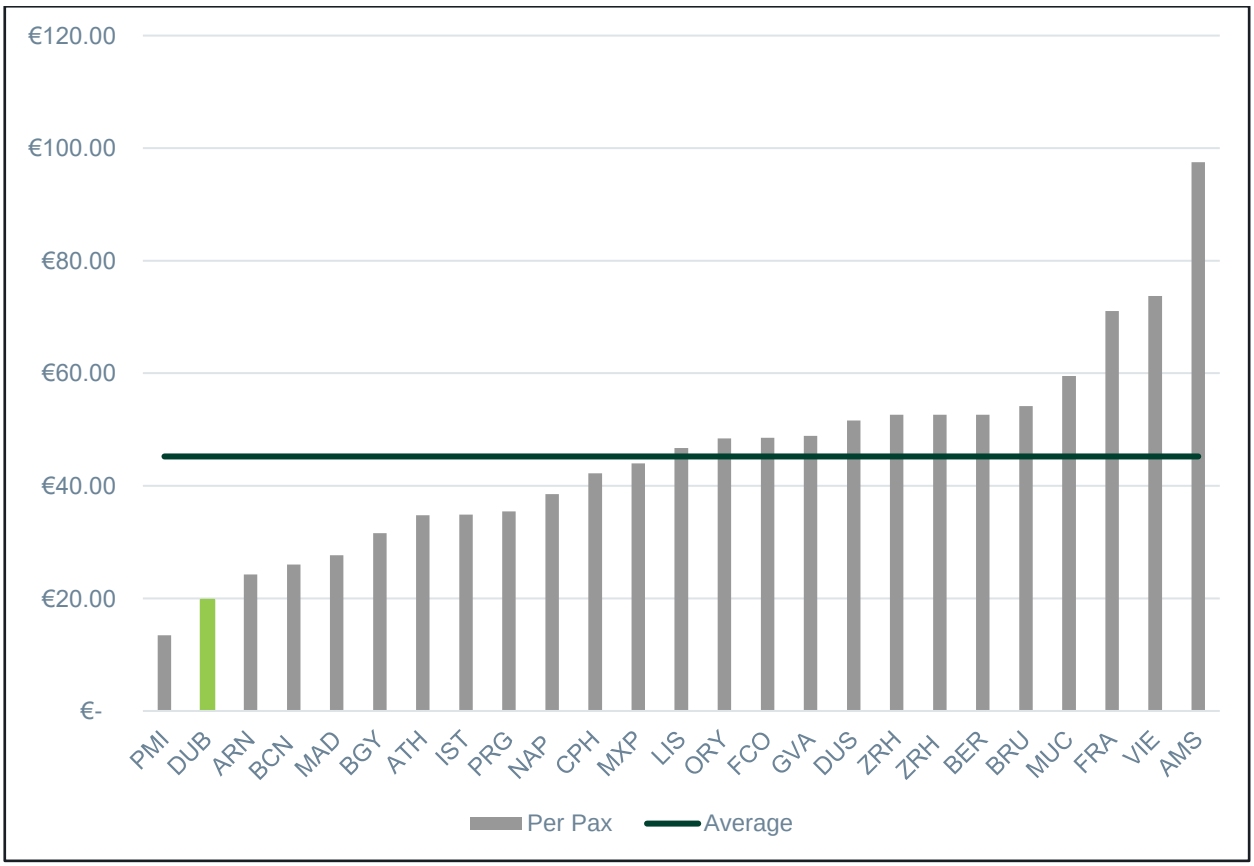
proposed to encourage the use of RDC/Loop which can be found in section 4.24.

12. Airport Charges Benchmarking

Competitive Airport Charges

12.1. Figure 2 and Figure 3 compare airport charges across major European airports. As outlined in Figure 2, Dublin (DUB) is positioned near the lower end at roughly €20 per *departing* passenger, well below the average of about €45. Airports like PMI, BCN, and MAD cluster between €15 and €25, while mid-tier airports such as CPH, ORY, and FCO range around €40–€50. Premium hubs like FRA and VIE are higher at €55–€60, and Amsterdam Schiphol (AMS) stands out as the most expensive at approximately €97.50 per passenger. This indicates Dublin remains highly competitive on charges compared to most European peers.

Figure 2. 2025 Charge per departing passenger

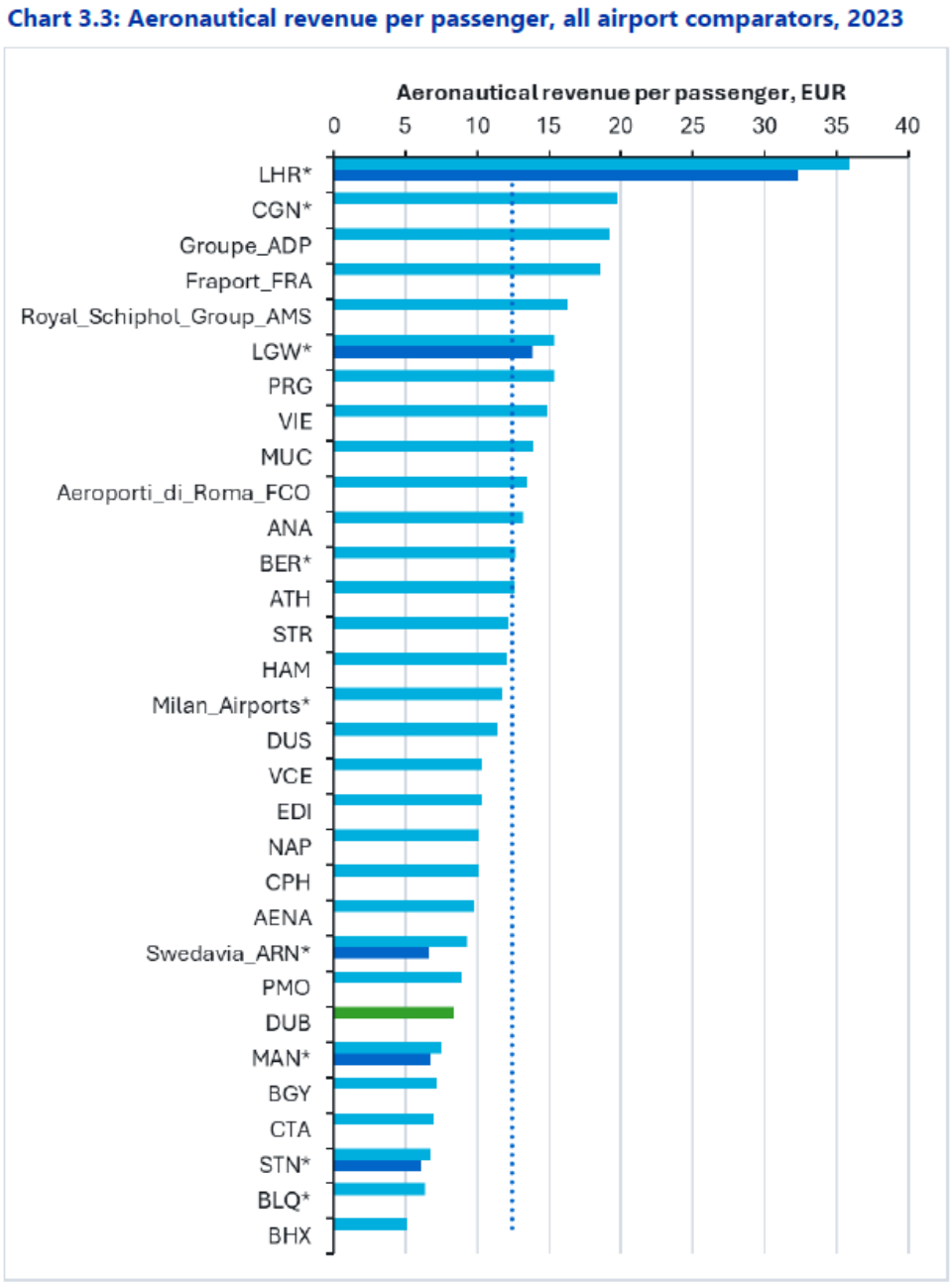


Source: RDC Airport Charges

12.2. This is echoed in Figure 3, Benchmarking of 2023 Charges that the IAA conducted albeit also including airports with far lower passenger numbers than Dublin, which also places Dublin at the lower end of airport charges compared to most other European airports. Dublin Airport's cost advantage is a key competitive strength in attracting and retaining airline services. With an average aeronautical revenue per passenger for 2025 of around €9.10–€9.20, Dublin sits well below the European average of approximately €45 and significantly under major hubs like Heathrow and Amsterdam. This low-cost position enables airlines to operate more economically, supporting route viability and encouraging network expansion without imposing high charges on carriers or passengers. In a market where cost efficiency is critical, Dublin's pricing structure positions it as an

attractive gateway for both short-haul and long-haul services, reinforcing its role as a competitive hub for transatlantic and European connectivity.

Figure 3. 2023 Charge per departing passenger



Source: IAA Issues Paper Annex

Jacobs Airport Charges Benchmark 2024

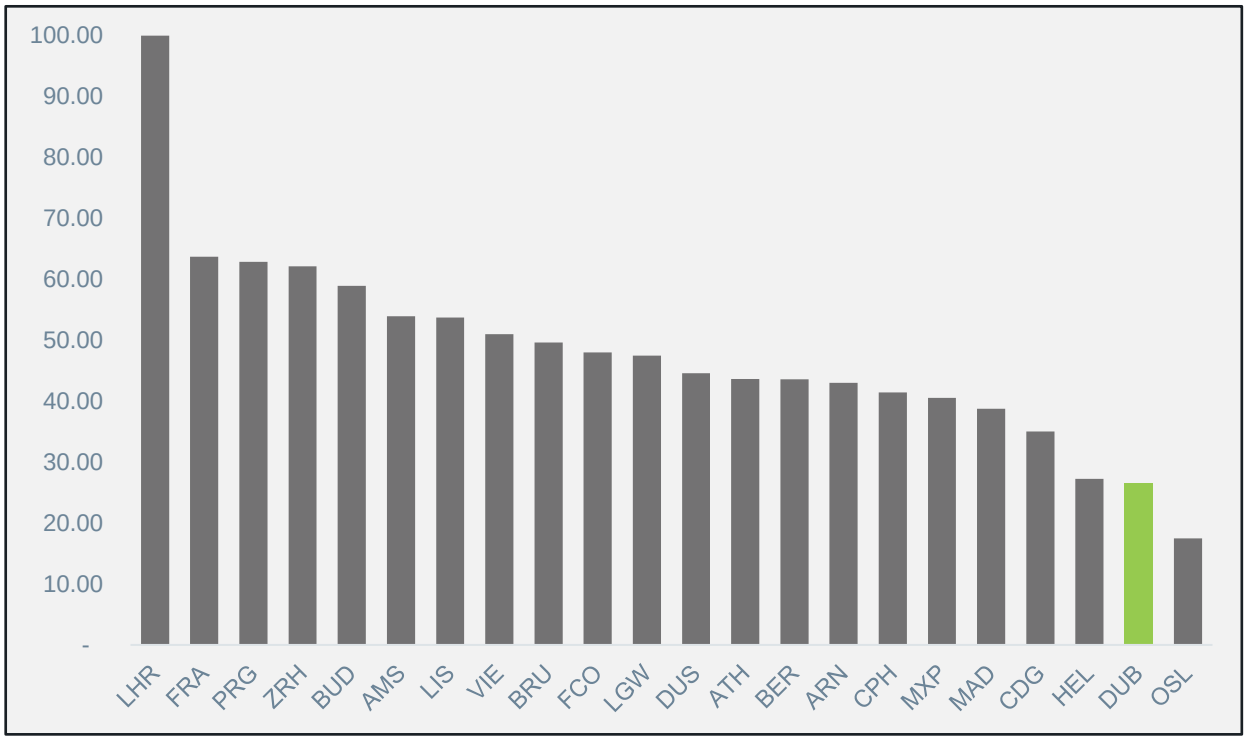
12.3. In addition to the above analysis, The Jacobs Airport Charges Benchmark refers to the annual Review of Airport Charges report produced by Jacobs, a global professional services firm. This report is a widely recognized benchmarking tool. Key Features of the report are:

- **Comparative Analysis**: Evaluates how airports worldwide stack up in terms of operational and financial efficiency, particularly focusing on airport user charges.

- **Charges Index**: Airports are ranked based on a Charges Index, which reflects the cost of operating typical aircraft types at each airport.
- **Fleet Mix Sensitivity**: The report includes analysis based on a representative fleet mix (e.g., eight common aircraft types), but airports like Heathrow have commissioned bespoke analyses using their own fleet data, which can significantly alter their ranking.
- **Environmental Charges**: Includes noise-related landing charges and other environmental fees, which can heavily influence the index.
- **Annual Updates**: The report is updated yearly to reflect changes in airport tariffs, aircraft technology, and regulatory environments.

12.4. Figure 4 is the latest Jacobs report which supports the above analysis that Dublin Airport has comparably low airport charges when compared with peer airports.

Figure 4. Jacobs Airport Charges Benchmark 2024



Source: Jacobs

13. CIP update

13.1. Capital expenditure progress at Dublin Airport is advancing under a €2 billion investment programme, but several strategic projects have faced delays due to planning and regulatory hurdles. Notably, the expansion of U.S. Customs and Border Protection facilities was delayed by over two years, and the North Runway planning amendments have been pending for more than three years. The Infrastructure Application (IA), which includes upgrades to Terminal 1, a new pier at Terminal 2, and a Ground Transportation Centre, is still under review following extensive feedback from Fingal County Council.

13.2. CIP27+ is Dublin Airport's upcoming capital investment programme, designed to support long-term growth beyond 40 million passengers annually. It will build on CIP2020+ by expanding terminal and airfield capacity, improving passenger experience, and enhancing sustainability through NZEB-compliant infrastructure and electrified ground operations. The programme also aims to strengthen Dublin's role as a global hub by improving connectivity and transfer capabilities. Planning and stakeholder alignment will be key, given the delays experienced in previous phases.

14. Conclusion

14.1. The 2026 Airport Charges proposal reflects Dublin Airport's commitment to balancing operational sustainability, regulatory compliance, and service quality amid strong passenger growth and infrastructure constraints. Newly proposed measures include enhanced differentiation between Day & Night, furthur noise modulation, and a differentiated runway charge. Stakeholder feedback will be critical to finalising a transparent, cost-related, and non-discriminatory charging structure that supports long-term competitiveness and investment in essential infrastructure.

14.2. A consultation meeting will take place on **20 November at 10am**, a meeting invite will follow the issue of this consultation document. Please indicate if you intend to join the meeting in person. Following this meeting, the deadline for written responses is set to 4 December at 5pm and can be addressed to apc-er@dublinairport.com.

Appendix 1: Proposed 2026 Airport Charges

Table 8. Proposed Airport Charges

	Dublin Charge Basis		Proposed 2026 Charges (€)		2025 Charges (€)		Variance (%)	
	Period		*Summer*	*Winter*	*Summer*	*Winter*	*Summer*	*Winter*
Passenger Charge per Departing Passenger	Departure on a Contact Stand		14.25	10.20	12.70	9.10	12%	12%
	Departure on a Remote Stand		6.90	3.65	6.15	3.25		
	Departure on a Satellite		12.90	8.85	11.50	7.90		
	Transfer Passengers	Contact	4.25	3.10	3.80	2.75	12%	13%
		Remote	2.10	1.15	1.85	1.00	14%	15%
		Satellite	3.90	2.65	3.45	2.35	13%	13%
Runway Movement Charge / tonne	Period		Summer	Winter	Summer	Winter	Day vs. S25	Day vs. W24/5
	Day (0700-2300)		5.60	2.80	5.00	2.50	12%	12%
	Night (2300-0700)		6.15	3.05				
Aircraft Parking (Per 15 minutes or part thereof, except "Long Term Remote" which is per day or part thereof)	Wide/Contact		49.80		44.40		12%	
	Narrow/Contact		40.20		35.80			
	Wide/Remote		13.80		12.30			
	Narrow/Remote		11.00		9.80			
	Wide/ Satellite		47.10		42.00			
	Narrow/ Satellite		36.90		32.90			
	Light Aircraft Parking Areas		3.95		3.50			
	Long Term Remote		263.10		234.50			
Airbridge Use	Per 15 minutes or part thereof		10.45		9.30		12%	
PRM Charge	<70% pre-notified		1.15		0.90		28%	
	70%-80%		1.05		0.85		24%	
	>80%		0.95		0.74		28%	
Fast-Track Charge	Per Fast-Track Passenger		1.13		0.82		38%	

Table 9. Proposed Noise Charges

	2025		2026		▲	
QC	Day	Night	Day	Night	Day	Night
0.125	€0	€0	-€75	€0	-€75	€0
0.25	€0	€0	-€50	€0	-€50	€0
0.5	€0	€150	€0	€200	€0	+€50
1	€300	€600	€400	€800	+€100	+€200
2	€400	€800	€500	€1000	+€100	+€200

Appendix 2: Revenues & Costs

Table 10. 2026 Aeronautical Revenue Budget Summary

Category	€'m
Runway	102
Passenger Service Charge	237
Noise	7.0
Parking	30.6
Airbridge	2.8
Incentives	-5.7
Estimated Airport Charges	**€ 374.4**
Passengers	37.3
Average Revenue per pax*	**€ 10.03**

Table 11. Regulated Entity Financial Accounts Revenue Summary[9]

	2022 Per Regulated Entity Accounts €'m	2023 Per Regulated Entity Accounts €'m	2024 Per Regulated Entity Accounts €'m
Runway	78.8	102.0	108.7
Parking	20.5	24.7	27.1
Airbridge	2.1	2.3	2.6
Passenger	136.9	180.9	198.3
Noise	0.3	1.4	4.9
Incentives	-97.9	-32.6	-18.3
Government funded Incentives	-83.2	-	-
Airport Charges Levied	223.9	278.7	323.3
Passengers	28.1	33.5	34.65
Average Revenue per Pax	€7.97	€8.31	9.33
Price Cap	€8.00	€8.46	9.54
Under-recovery	€ 0.03	€0.15	€0.21

[9] Regulatory Reporting

Table 12. Regulated Entity Financial Accounts Cost Summary[10]

	2024 Per Regulated Entity Accounts €'m	2023 Per Regulated Entity Accounts €'m
Pay		
Wages and salaries	194.9	183.0
Social insurance costs	18.1	17.6
Retirement benefit costs	11.9	10.7
Other payroll related costs	3.2	0.9
	228.0	212.3
Staff costs capitalised into fixed assets	-23.9	-18.4
Total Pay	204.2	193.8
Non-Pay		
Repairs and maintenance costs	22.2	17.3
Rents and rates	29.8	31.1
Energy costs	12.9	10.7
Technology operating costs & CUTE*	12.8	12.0
Insurance	5.1	4.2
Cleaning contracts & materials	11.4	10.6
Fees and professional services	15.4	17.7
Marketing & promotional costs	3.9	4.0
Aviation customer support	0.1	0.2
Telephone print and stationery	0.9	0.7
Employee related overheads	7.9	9.7
Other overheads	25.8	21.4
PRM service provider	14.7	11.2
Travel & subsistence	0.6	0.6
Car park direct overheads	7.7	5.4
Regulatory costs	4.7	5.2
	175.8	162.1
Depreciation and loss on retirements and disposals of fixed assets	132.9	121.1
Amortisation of capital grants	-1.0	-0.8
Total Non-Pay	131.9	120.2

[10] Regulatory Reporting

Appendix 3: Service Quality YTD Performance

Cat.	Metric	Jan-25	Feb-25	Mar-25	Q1	Apr-25	May-25	Jun-25	Q2	Jul-25	Aug-25	Sep-25	Q3	Accrued Penalties	Price Cap Adj.
Security	Maximum Security Queue Time													€0.00	€0.01
Baggage Handling	Out-bound baggage	Pass	Pass	Pass		Pass	Pass	Pass		Pass	Pass	Pass		€0.00	€0.00
	In-bound baggage	Pass	Pass	Pass		Pass	Pass	Pass		Pass	Pass	Pass		€0.00	
Availability of Assets	Availability of FEGP	99.96%	99.97%	99.98%	99.97%	99.94%	99.35%	99.93%	99.74%	99.89%	99.80%	99.97%	99.89%	€0.00	€0.00
	Availability of AVDGS	99.86%	99.60%	99.31%	99.59%	99.99%	99.93%	99.99%	99.97%	99.83%	99.86%	99.92%	99.87%	€0.00	
	Availability of T2 Paasenger Facing Lifts and Escalators	99.60%	99.30%	99.64%	99.51%	99.60%	99.60%	99.54%	99.58%	99.61%	99.45%	99.92%	99.66%	€0.00	
	Availability of SSKs and bag drop machines	99.48%	99.39%	99.22%	99.36%	99.51%	99.33%	99.37%	99.40%	99.41%	99.56%	99.38%	99.45%	€0.00	
Pax Care		Arr Score	Dep Score	Arr +/-	Dep +/-	Arr Score	Dep Score	Arr +/-	Dep +/-	Arr Score	Dep Score	Arr +/-	Dep +/-		-€0.02
	Overall satisfaction	9.2	8.8		0	9.1	8.6	0	0	9.2	8.7	0	0	0	
	Courtesy and helpfulness of airport staff		8.9		0		8.9		0		8.9		0	0	
	Courtesy and helpfulness of security staff		8.9		0		8.7		0		8.8		0	0	
	Overall cleanliness of the airport terminal	8.9	8.7	0	0	9	8.6	0	0	8.9	8.6	0	0	0	
	Cleanliness of washrooms	9	8.6	0	0	8.7	8.4	0	-0.01	8.6	8.4	0	-0.01	-0.02	
	Departure Gates		8.5		0		8.3		0		8.4		0	0	
	Ease of Movement	8.9	8.7	0	0	8.9	8.5	0	0	8.8	8.6	0	0	0	
	Additional Assistance													0	
Pax Information	Finding your way around	9	8.9	0.01	0	8.9	8.7	0	0	9.1	8.8	0.01	0	0.02	-€0.01
	Flight information screens		8.9		0		8.9		0		8.9		0	0	
	Information on Ground Transport on Arrival	8.2		-0.01		8.1		-0.01		7.9		-0.01		-0.03	
Pax facilities & service	Availability of Baggage trolleys	9.4	8.9	0.01	0	9	8.7	0.01	0	9	8.8	0.01	0	0.03	€0.04
	Satisfaction with free Wi-Fi	9.3	9.2	0.01	0.01	9.1	9	0.01	0.01	8.9	8.9	0	0	0.04	
	Facilities for those requiring additional assistance													0	