



# **Dublin Airport Aeronautical Charges & Incentives**

29 March 2026 – 27 March 2027

Decision 11 December 2025



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# 1. Introduction & Context

#### Introduction

1.1. This document presents Dublin Airport's Final Decision on Aeronautical Charges for the 2026/27 charging period, following the consultation document published on 6 November and meeting held on 20 November 2025. The process was conducted in line with Statutory Instrument 116/2011 – European Communities (Dublin Airport Charges) Regulations 2011, which transposes the EU Airport Charges Directive (Directive 2009/12) into Irish law.

#### **Consultation Process**

1.2. The consultation provided airport users with an opportunity to review and comment on proposed aeronautical charges for 2026/27, the methodologies underpinning cost recovery and price cap calculation, and adjustments linked to capital investment. Written submissions were invited until 4 December 2025, and all feedback has been considered in finalising this Decision.

#### Key Context for 2026

1.3. Passenger volumes are forecasted to be 37.5mppa (slight increase on 37.33mppa consulted due to airport user feedback), representing a three percent increase from 2025. The expected price cap is €10.39 per departing passenger, comprising a base of €7.77 plus inflation and adjustments for major projects such as the North Runway, T1 Security Mezzanine, and the West Apron Underpass¹. The strategic objective is to ensure compliance with regulatory requirements, maintain financial sustainability, and support infrastructure development while balancing user interests.

# **Purpose of This Decision**

1.4. This document sets out the final schedule of aeronautical charges for 2026/27, explains the rationale for adjustments compared to 2025, and outlines associated terms and conditions. The charges aim to deliver a fair, transparent, and cost-related framework that supports Dublin Airport's operational efficiency and long-term investment strategy.

**Table 1.** 2026 Airport Charges Consultation Process

<sup>&</sup>lt;sup>1</sup> see 2026 Airport Charges Consultation for detailed breakdown

Date	Step	Deliverable	
6 Nov. Consultation Document Issued		The consultation document outlined the proposed airport charges for 2026 and set out a range of information, including airport costs, revenues, capital plan update and charging methodology.	
20 Nov.	Consultation Meeting	The consultation meeting was held both in-person and virtually, in which daa presented pricing proposals for 2026.	
25 Nov.	Minutes & Answers to Clarification questions issued	daa issued the minutes from the 2026 Airport Charges Consultation Meeting and provided further information in response to clarification questions.	
4 Dec.	Response Deadline	daa received 8 airport user responses to the proposal.	
Decision on 2025 Airport 11 Dec. Charges, Incentives and Terms & Conditions		This document completes the annual charges consultation held under the provisions of S.I. 116/2011.	

# 2. 2026 Airport Charges

# **Proposal**

# Price cap and average charge comparison

2.1. Table 2 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.

**Table 2.** Expected price cap & average charge

	2025	2026	<b>A</b>
Price Cap	€9.40	€10.39	11%
Average Charge	€9.21	€10.03	9%
Under recovery	-2%	-4%	nm

# Airport User Feedback

2.2. Several respondents highlighted the need for reconciliation between the stated average charge increase of approximately 9% and the individual rate uplifts of 12% or more. Stakeholders requested a transparent breakdown by charge type and period, including the effect of the April implementation date, to clarify how the average increase aligns with the higher rate table adjustments. The absence of such reconciliation was viewed as undermining transparency and raising questions about proportionality and cost justification.

2.3. We acknowledge the feedback regarding the apparent discrepancy between the stated average increase of approximately 9% and the higher individual rate adjustments of 12% or more. The difference arises primarily from the timing of implementation on 1 April and the blended effect across the calendar year. The rate table reflects charges effective from Summer 2026, while the average charge calculation incorporates Jan. – Mar. at current winter rates. Table 3 below provides a breakdown and reconciliation of 12% increase in unit rates and corresponding 9% increase in the average charge.

**Table 3.** Average charge breakdown

Average charge at +12% v 2025	€10.30
RSS	-€0.08
Runway at 11%	-€0.02
Fast Tracking Income	€0.01
PRM	€0.08
Noise Rebate	-€0.13
3 months at Winter Pricing (Jan - Mar)	-€0.13
Average charge at +9% v 2025	€10.03

# 3. Passenger Forecast

# **Proposal**

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

# Airport User Feedback

- 3.2. Airport users expressed significant concerns about Dublin Airport's passenger forecasts for 2026, arguing that they are overly conservative and risk distorting the price cap mechanism. daa projects only 3% growth to 37.3 million passengers, despite 2025 traffic tracking well above forecast and airlines expecting closer to 38 million. Some users highlighted that its on-sale capacity for early 2026 is already 7.3% ahead of the same period in 2025, making the 3% growth assumption unrealistic. Airport users noted that historic forecasts have consistently underestimated demand and requesting daa to provide clarity on the assumptions behind its projections.
- 3.3. Airport users warned that underestimating passenger numbers inflates the price cap and leads to disproportionate charge increases, which could harm competitiveness and connectivity. Several carriers urged daa to revise its forecasts upward to reflect market realities, including strong demand, network expansion, and macroeconomic factors. They emphasized that accurate forecasting is critical for fair pricing and long-term planning, particularly given Dublin Airport's role as a hub and its monopoly position. Users also called for greater transparency in the forecasting methodology and suggested that daa leverage its strong commercial revenue performance to absorb some cost pressures rather than passing them entirely to airlines.

- 3.4. During the 2025 charges consultation (Q4 2024), there was much uncertainty surrounding seat caps for 2025. The IAA had already set a seat cap for Q1 2025 and all of Summer 25. High Court proceedings were running in parallel to the annual charge's consultation and slot allocation for Summer 25. The High Court ultimately suspended the seat cap and subsequently, late in the seasonal process, the slot co-ordinator was able to approve additional slot requests. In the absence of clarity on confirmed capacity, daa explained at the charges consultation meeting that it would simply use the IAA regulatory target of 34.7m to demonstrate price cap compliance for 2025. There was no ulterior motive. With the seat cap suspended for Summer 25, passenger numbers subsequently trended above the IAA target and the outturn for the year is currently running 4.5% above the IAA estimate.
- 3.5. The initial passenger projection for 2026 was based on limited airline schedule information for Summer 26. More clarity has now emerged, and we are in a position to revise the original projection of 37.3m to 37.5m passengers. This is based on schedule filings for Q1 at +9.5% capacity growth on 2025. At present, we assume Summer 26 capacity to be +4% on Summer 25, albeit many airlines have yet to finalise their schedules, and we have no real guidance on Nov/Dec 2026, so assume 2-3% capacity growth on Nov/Dec 2025 (which will be record months). Amending the passenger forecast upwards has no material bearing on the pricing proposal, as the allowed aeronautical revenue increases in line with the passenger forecast increase.

# 4. Noise Charges

# **Proposal**

- 4.1. Noise emissions greatly affect the surrounding community of Dublin Airport. To incentivise a quieter and cleaner fleet use, noise charges were introduced in 2023<sup>2</sup>. Dublin Airport took a stepped approach to noise charges were 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.
- 4.2. Noise charges are referred to in Dublin Airport's Noise Management Plan 2025-2028<sup>3</sup>. This contains the list of Noise Mitigation Measures (albeit updated from a 2023 version) referred to in the Dublin Airport Noise Action Plan 2024-2028 developed by Aircraft Noise Competent Authority (ANCA) / Fingal County Council (FCC) under the EU Environmental Noise Directive. Dublin Airport is required to report compliance with these mitigation measures in its Annual Section 19 Compliance Report submitted to ANCA and published on the FCC website.
- 4.3. Charges are based on the Quota Count (QC) system, which assigns values for take-off and landing to aircraft 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.
- 4.4. 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

<sup>&</sup>lt;sup>2</sup> See <u>Terms & Conditions</u> for QC Methodology

<sup>&</sup>lt;sup>3</sup> dublin-airport-noise-management-plan--2025-2028.pdf

quota of 16,260 as well as an annual night movement cap of 35,672. The Decision also prohibits the night-time arrival of aircraft with QC(Arrival) of 2 or greater, and the night-time departure of aircraft with QC(Departure) of 4 or greater.

4.5. To achieve the desired outcomes outlined above and following the ACP Decision, daa proposed 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

	20	025	2026		YoY Variance	
QC	Day	Night	Day	Night	Day	Night
0.125	€0	€0	-€75	€0	€0	€0
0.25	€0	€0	-€50	€0	€0	€0
0.5	€0	€150	€0	€200	€0	+€50
1	€300	€600	€400	€800	+€100	+€200
2	€400	€800	€500	€1000	+€100	+€200

# Airport User Feedback

- 4.6. Airlines and industry bodies broadly agree that the proposed changes to noise charges are premature and insufficiently justified. Airport users highlight that the ACP decision introducing a night movement cap and a noise quota system remains under Judicial Review and cannot be considered final. They argue that implementing significant changes before legal and regulatory clarity is achieved risks non-compliance with EU and ICAO principles. Stakeholders also criticize the lack of transparency in the methodology used to calculate day/night differentiation and the absence of evidence showing how these charges will reduce community noise exposure. Concerns were raised that the proposed increases—particularly for certain QC categories—may be disproportionate, discriminatory, and primarily revenue-driven rather than environmentally effective. Other users raise concerns about the proposed increase for QC1 and QC2 aircraft introduced without clear rationale or methodology. They argue charges disproportionately affect express cargo operators, who must use wide-bodied intercontinental freighters for overnight operations due to market constraints. Furthermore, users argue the structure may contravene ICAO's non-discrimination principle and obligations under the U.S.-EU Air Transport Agreement.
- 4.7. While some carriers support the principle of noise-related charges to incentivise quieter aircraft, most respondents call for a more balanced approach. Suggestions include introducing rebates for ultra-low-noise aircraft during night operations, ensuring any modulation is linked to measurable compliance objectives, and avoiding punitive uplifts that undermine hub connectivity or penalise airlines constrained by long-haul scheduling. Overall, users urge Dublin Airport to provide detailed impact assessments, confirm compliance with non-discrimination requirements, and postpone implementation until the ACP decision is legally validated.

#### Decision

4.8. Airport users raised significant concerns regarding the initial proposal to limit noise charge rebates to daytime operations, arguing that this approach failed to reflect the heightened community sensitivity to noise during night-time hours. Stakeholders emphasized that excluding night-time periods would undermine the effectiveness of the incentive scheme and could lead to disproportionate impacts on the local community. In response to this feedback, it has been decided to broaden the scope of the rebate program to include night-time operations, see Table 8 in Appendix 1 for the corresponding rate changes. This adjustment ensures that the scheme provides stronger financial incentives for operators to adopt quieter aircraft and operational practices when noise disturbance is most critical, aligning the program with both user expectations and community priorities. In response to airport users disputing the effectiveness of noise charges addressing noise on the local community, Table 4 illustrates the significant increase year-on-year of noise charges collected and a corresponding reduction in noise emissions at night, displayed as average quota count per movement. Dublin Airport's noise charge structure is fully aligned with the ICAO Balanced Approach and meeting the requirements of Regulation (EU) No. 598/2014 as implemented under the Aircraft Noise (Dublin Airport) Regulation Act 2019.

4.9.

**Table 5.** Noise Charges and Quota Count

Month	July 2025	July 2024	<b>A</b>
Noise Charges collected	€999,300	€539,660	85%
Number of Movements	24,598	23,344	5%
Total Quota Count	10,128	10,130	0%
Quota Count per Movement	0.412	0.43	-5%

# 5. Runway Charge

# **Proposal**

- 5.1. In response to the ACP Final Decision on nighttime flights at Dublin Airport, it was proposed that a higher runway charge rate is levied year-round during nighttime hours as defined in the ACP Final Decision (2300-0700).
- 5.2. The imposition of differentiated runway charges during night-time operations at Dublin Airport was to support objectives, ensure regulatory compliance, and maintain the financial sustainability of airport infrastructure. This justification draws on the regulatory framework established by the ANCA, the final decision of ACP, and the principles of cost recovery and modulation embedded in EU and national aviation policy.

### Regulatory Context

5.3. 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.

5.4. 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.

#### **Airport User Responses**

- 5.5. Airport users strongly question the proposed scale and rationale. Respondents emphasize that any modulation should be proportionate, evidence-based, and linked to environmental objectives rather than revenue generation. Concerns center on the lack of transparency in how the night-time surcharge was calculated and whether it genuinely incentivises quieter aircraft. Several carriers argue that punitive uplifts risk undermining route economics for hub-based operations, particularly long-haul services constrained by time-zone differences and slot availability at overseas airports. Other submissions outright rejected the surcharge, calling it discriminatory and unrelated to infrastructure costs, while noting that noise levels are not considered in the current structure. Other users emphasized that differentiating runway charges between day and night unfairly penalizes cargo operators, who must fly at night to meet just-in-time delivery commitments for key industry sectors. They argue this approach adds unnecessary cost to critical supply chain operations without clear evidence of benefit and should be delayed until the ACP judicial review concludes.
- 5.6. Some users supported differentiated charges in principle but requested a blended approach to limit daytime increases while achieving overall revenue targets. Other carriers stressed that the proposed night-time differential disproportionately impacts connecting carriers and could harm Dublin's hub competitiveness. Suggestions include aligning charges with measurable compliance objectives and postponing implementation until legal clarity on ACP restrictions is achieved. Overall, users call for a transparent methodology, proportional adjustments, and avoidance of measures that impose unnecessary cost burdens without delivering clear environmental benefits.

### Decision

- 5.7. This proposal was developed in response to the ACP NRRA decision (July 2025) which sets an annual movement cap on night-time activity. Unfortunately, the condition is not related to encouraging quieter aircraft operations at night, but instead is a blanket constraint on night-time activity, irrespective of aircraft noise category. Current activity in night-time hours is not restricted in any specific way and the annual volume of movements is approaching the level set by ACP. Hence, night-time activity will need to be rationed in order to manage compliance with the cap. Market economics widely advocates that scarce capacity should attract a price premium. More than one stakeholder response agrees that day/night price differentiation can be a legitimate compliance tool. Since the initial publication of the consultation material, daa has learned that the notification process to the European Commission is now subject to a Request for Information, which at a minimum, will delay the approval process. The notification timelines will now not be achieved for implementation in the Winter 26/27 season.
- 5.8. Airport users have strongly opposed the introduction of differentiated runway charges as a means to mitigate night flying following the ACP decision to cap night aircraft movements. Their feedback highlights that such charges would fail to create any meaningful incentive for airlines to operate quieter aircraft at night, as the planning cap applies equally to all aircraft types regardless of noise performance. This removes any potential benefit for carriers investing in low-noise technology, since quieter aircraft cannot access additional night slots under the current restriction. Users argue that differentiated charges in this context would simply impose additional costs without influencing behavior, while adding complexity and potential distortions to network planning. Stakeholders also caution that punitive pricing could lead to unintended consequences, such as shifting demand to less

efficient time periods or alternative airports, undermining connectivity and regional economic activity. The view of consultation respondents' is that compliance with planning conditions should be managed through operational and regulatory measures rather than through pricing strategies that lack a clear incentive effect.

5.9. Airport users have indicated that differentiated runway charges would not deliver the intended outcome of incentivising quieter aircraft during night hours, as the planning cap on night movements applies to all aircraft types regardless of noise performance. This means that even the quietest aircraft cannot gain additional access under the current restriction, removing any incentive effect. Therefore, based on user feedback, we have decided to postpone the introduction of the differentiated night-time runway rate and intend to reassess this regulatory compliance measure in twelve months' time, as part of the 2027 annual charges consultation. See Table 7 in Appendix 1 for the corresponding rate changes It should be noted that as there are currently no specific capacity restrictions in place for new slot applications in the night-time hours, nor any form of charging dissuasion for additional night-time activity for lower QC categories, it is highly likely that the annual levels of night-time movements in 2027 will be at or exceed the proposed annual cap.

# 6. Fast Track

#### Proposal

- 6.1. 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.
- 6.2. 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.
- 6.3. Over the past two years, Dublin Airport proposed changes to Fast Track Terms & Conditions to address capacity issues caused by increasing the number of passengers who can avail of Fast Track through their airline ticket class or loyalty programmes. 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.
- 6.4. 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)<sup>4</sup>.
  - 6.5. The 2025 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 Fast Track charge will be undertaken. This will consider the costs involved in T1 Security to the Mezz as-well as the new C3 and body scanners introduced

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<sup>&</sup>lt;sup>4</sup> See 3.7 of Terms & Conditions for more detail.

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 Security to the Mezz Project.

### **Airport User Responses**

- 6.6. Airlines expressed strong concerns about the proposed 38% increase in Fast Track charges, citing a lack of transparency and cost justification. Airlines have questioned the basis for such a significant uplift and requested detailed documentation on the underlying cost drivers, including any links to the Terminal 1 Mezzanine security project. Respondents emphasised that Fast Track is a premium facilitation service rather than an additional security service, and therefore core security equipment costs (e.g., C3 scanners) should remain within the standard security charge rather than being allocated to Fast Track. Several carriers noted that daa has provided no evidence of capacity constraints to justify changes in pricing or eligibility criteria.
- 6.7. Stakeholders also opposed proposed amendments to Fast Track Terms & Conditions that would restrict access to First or Business Class passengers, arguing these changes lack operational necessity and would breach the EU Airport Charges Directive's non-discrimination requirements. Airlines highlighted that daa's simultaneous promotion of Fast Track as a commercial product—through discount campaigns, "tap and go" services, and unlimited memberships—suggests revenue-driven motives rather than regulatory compliance. Overall, users call for daa to maintain existing eligibility criteria, ensure any price adjustments are strictly cost-based, and provide full transparency before implementing any changes.

#### Decision

6.8. Dublin Airport has decided to maintain the increase to Fast Track charges to reflect the significant investment made in upgrading the service as part of the Security to the Mezz project. This adjustment follows consultation and ensures that the enhanced facilities, improved passenger experience, and expanded capacity delivered through the project are sustainably funded and will be continually revised over the coming years. The revised pricing aligns with the airport's commitment to maintaining premium service standards while covering the increased operational and capital costs associated with these improvements.

# **7. PRM**

#### Proposal

- 7.1. 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.
- 7.2. 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.

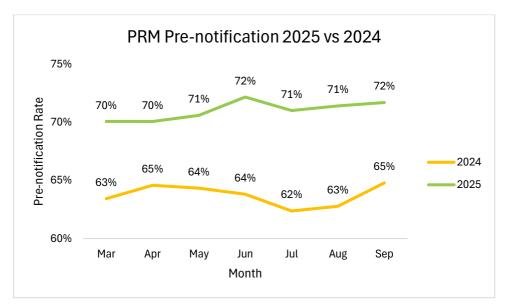


Figure 1. PRM pre-notification S25 vs. S24

- 7.3. 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 invited users to indicate the preferred option below:
  - a. A single PRM charge, removing banded rates.
  - b. retain the current banded structure.
- 7.4. Maintaining the current structure which rewards higher pre-notification. Table 7 displays the proposed PRM charges for both options a and b. Both options were 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 has been consulted on in the AOC subcommittee working group on PRM.

**Table 6.** PRM cost recovery

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

#### **Airport User Responses**

- 7.5. Airlines and industry bodies strongly object to the proposed 24–28% increase in PRM charges, citing a lack of transparency and insufficient cost justification. Respondents argue that daa has provided no detailed breakdown of cost drivers or evidence of service improvements to support such a significant uplift. Several submissions note that daa's reference to a "tender cost model" is inadequate for statutory consultation purposes, particularly as the new contract has not been finalized or agreed with airlines. Stakeholders emphasize that PRM charges must be cost-related, efficient, and compliant with EU Regulation 1107/2006 and Thessaloniki Forum guidelines on transparency and proportionality.
- 7.6. Concerns also focus on the proposed tiered structure based on pre-notification performance, which many carriers view as discriminatory and unrealistic. Airlines highlight that the highest threshold (80%) is unattainable due to structural factors such as passengers declaring assistance needs only upon arrival and regulatory constraints on requiring advance notice. Users propose lowering thresholds (e.g., top band to 75% and others by 5%) to make performance bands achievable, while other respondents favor reverting to a single PRM charge rate. Overall, users call for daa to provide full cost transparency, adjust thresholds to reflect operational realities, and ensure any incentive mechanism is objective, proportionate, and non-discriminatory.

#### **Decision**

- 7.7. PRM charges must remain cost-related and revenue-neutral, as required under Article 8(3) of Regulation (EC) No 1107/2006, which permits airports to levy charges solely to fund assistance for passengers with reduced mobility. Dublin Airport discharges this obligation by applying a dedicated PRM charge designed to recover the efficient cost of providing assistance services, without generating surplus revenue or cross-subsidizing other activities. This approach is aligned with the principles of transparency, proportionality, and non-discrimination under the EU Airport Charges Directive and Thessaloniki Forum guidelines.
- 7.8. In 2025, a tender was run for the provision of PRM services at Dublin Airport. An Airline Operators Committee (AOC) Working Group made up of daa and airline representatives was established as the decision making body on PRM tender matters including the agreement of service levels, final decisions on tender evaluation and agreed full consensus scoring in the tender evaluation. The increased PRM related costs for 2026 reflect the tender cost model, calibrated for 2026 volumes and adjusted for minimum wage increases. Whilst the tender cost model is commercially sensitive and cannot be shared as part of this consultation, a full breakdown of 2026 PRM costs as they relate to the tender cost model was shared with the AOC Working Group on the PRM tender at a meeting on 18/11/25.
- 7.9. daa has also observed a clear behavioral change among airlines (see Figure 1) in relation to preadvised rates, with improved compliance and earlier notifications contributing to more efficient resource planning and service delivery. daa considers that the existing approach continues to deliver operational benefits and incentivise timely communication. However, there has been large support for the reintroduction of a single PRM charge, daa will therefore remove the banded PRM charging structure based on pre-advised rates.

# 8. Incentives

- 8.1. 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.
- 8.2. 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.
- 8.3. 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 continue to pause the application of 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<sup>5</sup>.

# Airport User Feedback

- 8.4. Airlines consistently expressed disappointment with daa's decision to keep growth-related incentive schemes suspended, citing the critical role these programs play in route planning and long-term investment decisions. Respondents emphasized that incentives are integral to supporting new services and network expansion, particularly for long-haul routes requiring significant upfront investment. The absence of clear guidance on when and how these schemes will be reinstated creates uncertainty and undermines strategic planning. Respondents stressed that daa should provide greater transparency on the future structure, timing, and eligibility criteria for incentives to maintain a predictable and competitive operating environment.
- 8.5. Several carriers also requested that any reinstated incentives apply retrospectively to routes launched during the suspension period to avoid distortionary outcomes and ensure fairness for early movers. Airlines warned that failure to backdate incentives could penalize carriers that continued to invest despite uncertainty, while rewarding those who delayed expansion. Additionally, some airlines criticized daa's benchmarking approach for excluding the impact of incentives offered at peer airports, arguing that this omission presents a misleading view of Dublin

<sup>&</sup>lt;sup>5</sup> Incentive Schemes | Regulatory and Planning | Dublin Airport

Airport's competitiveness. Overall, users call for clear, transparent, and equitable incentives that supports sustainable growth and Ireland's connectivity objectives.

#### Decision

8.6. Dublin Airport will continue to suspend growth and new route incentives to ensure compliance with current capacity constraints and planning obligations. Annual capacity is still expected to be constrained regardless of current or future planning conditions, hence we intend to prioritise new connectivity for the Island of Ireland over additional capacity on existing routes. If additional developments occur sooner, fast-tracking the resumption of the above schemes to support growth will be considered.

# 9. Terms & Conditions

# Proposal

9.1. Minor changes to Section 4 were 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.

#### **Financial**

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

#### **Required Business Data**

- 9.3. The introduction of an administrative charge for non-use of the Loop platform in respect of Aircraft Fleet Declaration was 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.
- 9.4. 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.
- 9.5. To account for the additional administration cost of being 'off-system', a fee per aircraft was proposed to encourage the use of RDC/Loop which can be found in section 4.24.

#### **User Responses**

9.6. There was limited to no feedback from airport users on the proposed changes to the Terms & Conditions

### Decision

9.7. The changes to the Terms and Conditions, as consulted with users during the previous engagement process, will be applied for the upcoming period. These updates were designed to provide clarity and consistency in the application of airport charges and related processes, and daa considers that they continue to offer an appropriate and transparent framework.

# 10. Conclusion

10.1. daa has carefully considered the feedback received during the consultation process alongside operational and planning constraints. Based on this review, daa will postpone day/night differentiated runway charges, revert PRM charging structure based on a single charge and continue the suspension of growth incentives. In addition, noise charge rebates for night operations will be introduced, supporting airlines that operate quieter aircraft at night and reinforcing daa's commitment to incentivizing noise reduction. These decisions reflect daa's focus on fairness, transparency, and compliance with regulatory obligations while ensuring operational efficiency and service quality. daa would like to thank all airport users for their participation in the 2026 Airport Charges Consultation.

# Appendix 1: 2026 Airport Charges Decision

**Table 7.** 2026 Airport Charges

	Dublin Charge Basis		2026 C	ŭ
			(€)	
	Period		Summer	Winter
	Departure on a Contact Stand		14.20	10.20
	Departure or Remote Stan		6.90	3.65
Passenger Charge per Departing Passenger	Departure or Satellite	n a	12.90	8.85
	- (	Contact	4.25	3.05
	Transfer	Remote	2.05	1.10
	Passengers	Satellite	3.85	2.65
D	Period		Summer	Winter
Runway Movement Charge	Per tonne		5.55	2.78
	Wide/Contact		49.	75
	Narrow/Contact		40.	10
	Wide/Remote		13.	80
Aircraft Parking (Per 15 minutes or part	Narrow/Remote		11.00	
thereof, except "Long Term Remote" which	Wide/ Satellite		47.05	
is per day or part thereof)	Narrow/ Satellite		36.85	
	Light Aircraft Parking Areas		3.90	
	Long Term R	emote	262	.65
Airbridge Use	Per 15 minutes or part thereof		10.	40
PRM Charge Single Rate		Single Rate 1.09		05
Fast-Track Charge Per Fast-Track Passenger		:k	1.3	13

 Table 8. Noise Charges Decision

	20	26
QC	Day	Night
Α-	Set fee per movement	Set fee per movement
0.125	-€75	-€75
0.25	-€50	-€50
0.5	€0	€165
1	€400	€800
2	€500	€1000

# Appendix 2: Revenues & Costs

**Table 9.** Updated 2026 Aeronautical Revenue Budget Summary

Category	€′m
Runway	101.2
Passenger Service Charge	238.0
Noise	6.1
Parking	30.7
Airbridge	2.8
Incentives	-2.6
Estimated Airport Charges	€ 376.3
Passengers	37.5
Average Revenue per pax*	€ 10.03

**Table 10.** Regulated Entity Financial Accounts Revenue Summary<sup>6</sup>

	2022 Per Regulated Entity Accounts	2023 Per Regulated Entity Accounts	2024 Per Regulated Entity Accounts
	€′m	€′m	€'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	1	-
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

<sup>6</sup> Regulatory Reporting

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**Table 11.** Regulated Entity Financial Accounts Cost Summary<sup>7</sup>

	2024 Per Regulated Entity Accounts €'m	2023 Per Regulated Entity Accounts €'m
Pay	e III	e III
ruy		
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
риу		
	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

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<sup>&</sup>lt;sup>7</sup> 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	
		Arr Score	Dep Score	Arr +/-	Dep +/-	Arr Score	Dep Score	Arr +/-	Dep +/-	Arr Score	Dep Score	Arr +/-	Dep +/-		
Pax Care	Overall satisfaction	9.2	8.8		0	9.1	8.6	0	0	9.2	8.7	0	0	0	-€0.02
	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	