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Dublin Airport Aeronautical Charges and Incentives

30 Mar 2025 – 28 Mar 2026

*Final Proposal for Consultation*

25 November 2024

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## Executive Summary

Due to recent developments in legal proceedings taken against the Summer 2025 slot coordination parameters at Dublin Airport, daa is continuing the 2025 Airport Charges consultation process by setting out this third proposal.

This proposal consists of an updated menu of airport charges to ensure a price cap under recovery in a higher traffic scenario. Amendments have also been applied following a review of the Stage 2 Consultation responses.

The summary of the Final Proposal is as follows:

- (i) The 2025 price cap being applied is €9.34, this has decreased by €0.09 from the Stage 2 Consultation due to lower-than-expected October CPI outturn.
- (ii) Passenger Service Charge is decreasing by 1.5% when compared to 2024.
- (iii) S25/W26 Runway Movement Charge is decreasing by 32% and 4% respectively (when compared to 2024 Band 1 rates).
- (iv) A 70% transfer passenger discount will be applied to Contact, Remote & Satellite Passenger Service charge rates.
- (v) daa will withdraw the Low Emissions Aircraft Discount incentive scheme and remove NOx charges for 2025.
- (vi) A new 3 band PRM charge structure will be introduced whereby airlines who achieve a pre-advised rate of below 70% will pay €0.90, those with pre-advised rate between 70% to 80% will pay €0.85 and those that achieve above 80% will pay €0.74.
- (vii) All growth incentives will continue to be suspended. While a group of airlines were successful in obtaining a stay on that element of the IAA's summer 2025 Decision which imposes a PATM seat capacity of 25.2 million seats, the 32 million planning conditions remains in place, which inhibits daa's ability to incentivise growth.

With the above structural changes considered, the menu of aeronautical charges is set out in Section 2 along with a detailed revenue and cost breakdown provided in Section 3.

Airport Users are requested to submit final written submissions on this proposal by **5pm on the 4<sup>th</sup> December**. daa will then issue a Final Decision informed by the final responses from airport users and the regulatory requirements by mid-December.

# 1. Introduction

## 1.1 Regulatory Compliance

- 1.1.1 This paper sets out daa’s final proposed Aeronautical Charges for 2025-2026 following the consultation process which began on the 3<sup>rd</sup> October 2024.
- 1.1.2 The process of engagement between daa and airport users setting the 2025 airport charges at Dublin Airport, was undertaken in accordance with the ***European Communities (Dublin Airport Charges) Regulations 2011***<sup>1</sup>.
- 1.1.3 daa’s pricing proposal is in compliance with the 2025 price cap set by the IAA, as outlined in the Final Decision on an Interim Review of the 2019 Determination in relation to 2023 – 2026<sup>2</sup> (“Final Decision”), which was published on 23<sup>rd</sup> December 2022.
- 1.1.4 As outlined above, the consultation is now moving to a third proposal before a final decision is made. Below is a summary of the stages to date.

**Stage 1:** 2024 Review & 2025 Initial Proposal. (3 October)

**Stage 2:** 2025 Final Proposal on Aeronautical Charges. (30 October)

**Stage 3:** 2025 Updated Final Proposal. (25 November)

**A Final Decision will be issued by mid-December.**

- 1.1.5 Following the Stage 2 consultation, 10 responses were received.

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<sup>1</sup> <https://www.irishstatutebook.ie/eli/2011/si/116/made/en/print>

<sup>2</sup> [Final Decision 2022 23Dec\(2\).pdf \(aviationreg.ie\)](#)

## 1.2 2025 Price Cap

- 1.2.1 In setting the proposed Aeronautical Charges for 2025, daa is modelling the application of the charges to a price cap of €9.34, based on adjustments made to allow for CPI, W factor, Y factor, K factor, Z factor, SQM and capex triggers. This represents a €0.09 decrease from the expected price cap outlined in Stage 2, due to lower-than-expected October CPI<sup>3</sup>.

Table 1: 2025 Expected Price Cap

Price Cap Formula	2025
Base Price Cap	€7.48
<b>Capex Triggers:</b>	
North Runway (M2)	€0.30
T1 CS to Mezz (A1)	€0.10
<b>Other Adjustments:</b>	
CPI	€1.24
SQM	€0.00
Other <sup>4</sup>	€0.22
<b>Price Cap</b>	<b>€ 9.34</b>

## 2. 2025 Aeronautical Charges Final Proposal

### 2.1 2025 Outturn

- 2.1.1 The Stage 2 Charges Consultation document was based on a forecast of 33.4m pax, given the IAA seat cap slot co-ordination parameter in effect at that time.
- 2.1.2 The passenger forecast has been updated, given that the above parameter is no longer in effect, and in doing so we have anchored our modelling on the IAA forecast for 2025 of 34.7m passengers and this achieves an average aero charge of €9.18 (€0.24 decrease from Stage 2 Consultation figure).
- 2.1.3 For completeness, as shown in Section 3, price cap compliance is comfortably achieved under two scenarios of 33.4m and 34.7m pax, with a forecasted under recovery of €0.16c or more vs. the price cap in both scenarios.
- 2.1.4 daa is now amending the pricing menu as set out below.

### 2.2 Proposed Pricing (30<sup>th</sup> March 2025 – 28<sup>th</sup> March 2026)

<sup>3</sup> [Consumer Price Index October 2024 - Central Statistics Office](#)

<sup>4</sup> Other adjustments are based on the “k”, “w”, “y” and “z” factors, per the December 2022 Final Decision.

2.2.1 This Section sets out daa’s proposed Aeronautical Charges which would commence at the start of the Summer 2025 season (30<sup>th</sup> March 2025). The proposals outlined below are aligned with Dublin Airports strategic objectives for 2025, as detailed in Stage 1 & 2 of this consultation process.

2.2.2 Table 2 and 3 set out the Aeronautical Charges proposed for the Summer 2025 and Winter 2025/26 seasons with changes from Stage 2 highlighted in yellow.

Table 2: Proposed Aeronautical Charges for 2025

	Dublin Charge Basis	Proposed 2025 Charges		2024 Charges		Variance		
		(€)		(€)		(%)		
	Period	Summer	Winter	Summer	Winter	Summer	Winter	
<b>Passenger Charge per Departing Passenger</b>	Departure on a Contact Stand	12.70	9.10	12.9	9.20	-1.5%	-1.5%	
	Departure on a Remote Stand	6.15	3.25	6.25	3.30			
	Departure on a Satellite	11.5	7.90	11.70	8.00			
	Transfer Passengers	Contact	3.80	2.75	2.60	2.10	46%	31%
		Remote	1.85	1.00			-29%	-53%
Satellite		3.45	2.35	33%			12%	
<b>Runway Movement Charge / tonne</b>	Period	Summer	Winter	Summer	Winter	Summer	Winter	
	Band 1 – 0 to 175 tonnes	5.00	2.50	7.35	2.60	-32% (vs. B1)	-4% (vs. B1)	
	Band 2 - >175 tonnes			3.70	1.30			
<b>Aircraft Parking (Per 15 minutes or part thereof, except “Long Term Remote” which is per day or part thereof)</b>	Wide/Contact	44.40		44.40		0%		
	Narrow/Contact	35.80		35.80				
	Wide/Remote	12.30		12.30				
	Narrow/Remote	9.80		9.80				
	Wide/ Satellite	41.00		41.00				
	Narrow/ Satellite	32.90		32.90				
	Light Aircraft Parking Areas	3.50		3.50				
	Long Term Remote	234.50		234.50				
<b>Airbridge Use</b>	Per 15 minutes or part thereof	9.30		9.30		0%		
<b>PRM Charge</b>	<70% pre-notified	0.90		0.74		22%		
	70%-80%	0.85			15%			
	>80%	0.74			0%			
<b>Fast-Track Charge</b>	Per Fast-Track Passenger	0.82		0.80		2.5%		

Table 3: Proposed Noise Charges

Noise Charges		
QC	Set fee per Tonne 2025	Set fee per Tonne 2025

	<i>Day</i>	<i>Night</i>
0	€0.00	€0.00
0.125	€0.00	€0.00
0.25	€0.00	€0.00
0.5	€0.00	€2.00
1	€1.00	€4.00
2	€2.00	€8.00
4	€4.00	€12.00
8	€6.00	€16.00
16	€8.00	€20.00

2.2.3 The application is based on the QC system, with an aircraft’s noise certification which takes account of both aircraft type and specific configurations such as engines and other noise reduction design features. As outlined in the Terms & Conditions, users must provide this information to RDC Loop.

2.2.4 The application of noise measurement under the QC system is managed using:

**Arrival movement**

Noise Classification = Noise Approach (EPNdB) – 9dB

**Departure movement**

Noise Classification = Average of Noise Lateral (EPNdB) and Noise Take-off (EPNdB)

*Table 4: Noise Charge Time Adjustments*

<b>Noise Charge Time</b>
Noise Charging fee per set tonne for aircraft listed within from QC0-QC16 and above applies Day and Night. Day is defined by the hours between 0700 and 2259. Night is defined by the hours between 2300 and 0659. All times are local.

2.2.5 The Noise Classification values are then used to assign a Quota Count Value according to the following table:



Table 5: QC Value Noise Classification Assignments

QC Assignments		
Noise Classification lower bound	Noise Classification upper bound	Quota Count Value
<81		0
81	83.9	0.125
84	86.9	0.25
87	89.9	0.5
90	92.9	1
93	95.9	2
96	98.9	4
99	101.9	8
>101.9		16

2.2.6 In 2024, the PRM charge per passenger was €0.74. It was assumed this would allow for €0.5m of the cumulative under recovery to be recouped in 2024, however as a result of PRM passenger concentration increasing from 2.37% in 2023 to 2.61% 2024 (+10%) it is now expected there will be an under recovery in 2024 of c. €0.8m. In order to allow for the increased concentration of PRM passengers and wage increases of c. 6% from 1 January 2025, an average PRM charge of €0.85 will be required in 2025. This has been stress tested against the passenger forecast range for 2025, as detailed in the following table 6.

Table 6: PRM 2025 Charge Calculation

2025 Charge:	€'m	€'m
Estimated annual cost	13.5	14.0
Under recovery recouped	0.5	0.5
Total cost to recover	<b>14.0</b>	<b>14.5</b>
Departing passenger estimate	<b>16.4</b>	<b>17.1</b>
Av. Charge	<b>€0.85</b>	<b>€0.85</b>

Table 7: PRM Service at Dublin Airport 2020 – 2024

€'000	2021	2022	2023	2024
	Audited	Audited	Audited	Expected

<sup>5</sup> As outlined in the ANCA Regulatory Decision [Regulatory Decision.pdf \(fingal.ie\)](#)

Departing pax	4,116	13,751	16,505	16,880
Actual charge, €	€0.58	€0.58/€0.69	€0.69	€0.69/€0.74
PRM Turnover	2,387	9,285	11,389	12,530
Total PRM Costs	3,423	8,899	11,205	€13,363
Under (-over) recovery for Year	1,035	-386	-184	833
<b>Closing under recovery (2020 – 2023)</b>	<b>4,051</b>	<b>3,666</b>	<b>3,482</b>	<b>4,315</b>
Average cost per PRM, €	38.35	27.86	28.60	32.17
PRM concentration (as % of departing pax)	2.17%	2.32%	2.37%	2.61%

### 3. Aeronautical Revenue Summary

#### 3.1 Regulatory Compliance

- 3.1.1 This section provides an updated aeronautical revenue breakdown following the re-pricing of the 2025 airport charges menu.
- 3.1.2 In accordance with S.I. 116, a detailed breakdown of revenues, costs, capital expenditure and financial accounts have been provided in the Stage 2 consultation document issued 25 October 2024. For further information on the structure of charges please refer to this document<sup>6</sup>.
- 3.1.3 Table 8 outlines the total aeronautical revenue based on two forecasts of 33.4m and 34.7m passengers. As previously highlighted, due to the uncertainties on traffic volumes in 2025 daa has reduced charge rates to a level which ensures an under recovery with higher passenger volumes.

*Table 8: Updated Final Proposed 2025 Aeronautical Charges Revenue Breakdown*

Category	33.4m Passenger Scenario (€'m)	34.7m Passenger Scenario (€'m)
Runway	80	84
Passenger Service Charge	192	200
Noise	9.2	9.8
Parking	26.6	27.6
Airbridge	2.4	2.5
Incentives	-4.1	-4.3
LEAD	-1.1	-1.1
<b>Estimated Airport Charges</b>	<b>304.8</b>	<b>318.5</b>
Passengers	33.4	34.7
<b>Average Revenue per Passenger</b>	<b>€ 9.12</b>	<b>€ 9.18</b>

<sup>6</sup> [airport-charges-consultation-final-proposal.pdf](#)

## 4. Stage 2 Responses

### 4.1 Transfer Charge

#### Stage 2 Proposal

- 4.1.1 daa's Stage 2 proposal outlined a 70% discount when compared to the contact passenger charge. daa believed this is an appropriate and justified response which is relevant, objective and transparent with 41% of the discount being cost-related and the remaining 29% being based on the secondary criteria. A discount of 70% would ensure Dublin remains competitive with the most price competitive hubs, which is crucial given Dublin's lower transfer passenger share.

#### Airport User Responses

- 4.1.2 User 7 rejects any form of transfer charge and requested that it be removed, arguing that no other airport in Europe provide a discount at that level. User 7 also argue that daa's percentage discount ignores the absolute charges when compared to VIE and AMS.
- 4.1.3 Users 1-5 argue that a lower discount will limit Dublin's competitiveness and ability to attract transfer passengers, volumes are low relative to competing airports, and is not aligned with the National Aviation Policy.
- 4.1.4 User 6 proposed that the transfer charge does not account for the lower cost associated with Remote or Satellite stands and should be linked to the level of PSC levied i.e. a lower transfer charge for remote/satellite stands.

#### daa response

- 4.1.5 As outlined in Stage 2, the Transfer passenger charge is a strategic tool to increase Dublin Airport's position as a hub and is a key element to attract and grow transfer passenger traffic while also demonstrating cost relatedness.
- 4.1.6 daa does not agree with the argument presented by User 7 that comparing percentage discounts is not relevant as absolute charges are higher in comparator airports. Transfer passengers in other European hub airports make a significantly larger share of total passengers compared to Dublin Airport, which would require a larger share of cost recovered from transfer passengers.
- 4.1.7 In response to Users 1-5, as part of the Stage 1 and Stage 2 consultation documents, daa detailed the relevant objectives that the transfer charge aims to achieve while transparently outlining the cost and subjective elements that were used to arrive at a 70% discount.
- 4.1.8 daa believes there is merit in the feedback received from User 6. As a result, the transfer charge will be 30% of the respective passenger service charge levied.

## 4.2 Runway Movement Charge

### Stage 2 Proposal

- 4.2.1 Following consideration of user views in the Stage 1 consultation regarding the 3 runway charges options, daa proposed to remove runway banding, instead applying a single unit MTOW calculation per movement while seasonal differentiation was also retained.

### Airport User Responses

- 4.2.2 User 10 who did not respond in Stage 1, expressed dissatisfaction with seasonality being removed as part of the Stage 2 engagement. User 4 supports the maintaining of seasonality and the current runway charging structure. User 1 does not support the removal of banding arguing that it could be justified by non-cost criteria and that it unfairly penalises widebodies, which it states are critical to the hub model. Users 2, 3 and 5 likewise do not support the removal of Band 2. Moreover, User 1 requests that other metrics apart from MTOW be considered. User 6 does not support the increased costs of using the runway in winter arguing it disincentives homebased carriers. User 7 supports the removal of Band 2.

### daa response

#### Transparency

- 4.2.3 As part of the Stage 1 consultation proposal, three different options were outlined as to how to levy a runway movement charge which daa believed would help achieve the strategic objectives for 2025. This gave users an opportunity to contribute and inform the process of selecting the most common option to bring forward to daa's Final Proposal. daa believe Transparency has been met in this regard.
- 4.2.4 Considering airport users responses against the increase of the winter runway charge in Stage 2, the runway charge is now being decreased in winter and summer, resulting in a lower YoY change per turnaround outlined in Table 9. Users 1, 4 and 6 argued the winter charge promotes efficient use of infrastructure in winter, daa recognizes this and has adjusted the charges accordingly, but notes that the winter cap reduces the scope of this argument.

*Table 9. Indicative S25 vs S24 Turnaround Charge.*

Airbus A330	Summer 2024	Summer 2025	2025 vs 2024
Runway Landing	€ 1,366	€ 1,175	-14%
Runway Take Off	€ 1,366	€ 1,175	-14%
Parking	€ 533	€ 533	0%
Passenger Service	€ 2,921	€ 2,953	1%
Airbridge	€ 112	€ 112	0%
PRM	€ 199	€ 229	15%
Noise	€ 470	€ 940	100%
NOx	€ 20	€ -	-100%
<b>Total</b>	<b>€ 6,986</b>	<b>€ 7,117</b>	<b>2%</b>

4.2.5 daa does not agree with User 1 and 2's claim that widebody incentives are needed for the National Aviation Policy nor that the same non-cost justifications for seasonality can be applied to Band 2. Narrowbodies are increasingly being used on transatlantic flights/long-haul flights with next gen aircrafts such as 737 Maxs and A321 XLRs, making it unclear what efficiencies Band 2 would achieve for long-haul operations and thus hard to justify its objectivity. daa would like to highlight that the increased costs to widebodies will be offset by the reduction in runway charges (-14% YoY in summer). Given the 2024 complaint against Band 2, the lack of engagement from other widebody operators on Band 2, and the IAA's regulatory Decision which finds it hard to justify, daa retains the proposal of removing Band 2:

*5.25 Our Draft Decision recommended that the structure of the RWMC be reconsidered. We noted our doubts over whether it is an appropriate/optimal way to achieve the referenced objectives, and consequently noted that it is challenging to justify in line with the 2011 Regulations. At a minimum we highlighted it is necessary for Dublin Airport to provide clarity on the justification/Relevance of the two-banded approach, and how this interacts with the other aspects of the charging strategy such that double counting is avoided.<sup>7</sup>*

4.2.6 Regarding using an alternative modulation to MTOW, daa notes that in Stages 1 and 2 2025 consultation documents, it provided option 2 for a movements charge based off QC, which User 1 did not support. It therefore disputes User 1's claim that it did not consider alternatives to MTOW. User 1 also questions that "a single tonne of MTOW" was the preferred option arguing users did not comment on Band 2 or supported its retention. daa would highlight that Option 1 was the preferred option among airlines from the 3 options provided. Furthermore, contrary to User 1's claim that ICAO does not recommend MTOW modulation it notes the following:

*"i) Landing charges should be based on the weight formula, using the maximum certificated take-off weight as indicated in the certificate of airworthiness (or other prescribed document) as the basis for assessment."*

*ii) The landing charge scale should be based on a constant rate per 1,000 kilograms or pounds in weight, but the rate may be varied at a certain level or levels of weight if considered necessary."<sup>8</sup>*

4.2.7 The language used by ICAO clearly states MTOW should be used as part of landing charges and thus this is not a suggestion from ICAO as User 1 claims.

### 4.3 Noise Charges

#### Stage 2 Proposal

4.3.1 Noise charge rates were uniformly doubled across the QC assignment table, increasing the share of total airport charges collected.

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<sup>7</sup> IAA Final Decision on Back of Ryanair Complaint 2024 Paragraph 5.25: [https://www.iaa.ie/docs/default-source/car-documents/1c-economic-regulation/ryanair-final-decision\\_final.pdf?sfvrsn=38c2ecf3\\_1](https://www.iaa.ie/docs/default-source/car-documents/1c-economic-regulation/ryanair-final-decision_final.pdf?sfvrsn=38c2ecf3_1)

<sup>8</sup> Paragraph 2.3 Landing Charges: [ICAO 9082-10 2024 Edition](#)

## Airport User Responses

4.3.2 Users 1-5 opposed the increase in noise charges noting that the increase is abrupt and does not influence fleet decisions as the nature of such decisions are long term. User 2 notes that widebody aircraft are disproportionately penalised given that larger aircraft generate more noise.

### daa response

4.3.3 Following the removal of other environmental initiatives, noise charges are now the only lever available to Dublin Airport to drive behavioural change, differentiate aircraft based on emissions and achieve strategic goals and local operational obligations. While increases to noise charges are material, other charges have decreased to rebalance noise as a larger component of total airport charges.

Table 10. Noise Charges 2025

Noise Charges					
QC	Proposed Set fee per Tonne 2025 Day	Proposed Set fee per Tonne 2025 Night	Day Variance V's 2024	Night Variance V's 2024	Example Aircraft (Dep.)
0	€0.00	€0.00	€0.00	€0.00	-
0.125	€0.00	€0.00	€0.00	€0.00	ATR72
0.25	€0.00	€0.00	€0.00	€0.00	A320N
0.5	€0.00	€2.00	€0.00	€1.00	B737-8
1	€1.00	€4.00	€0.50	€2.00	A321
2	€2.00	€8.00	€1.00	€4.00	A330
4	€4.00	€12.00	€2.00	€6.00	B767-F
8	€6.00	€16.00	€3.00	€8.00	
16	€8.00	€20.00	€4.00	€10.00	

4.3.4 In response to Users' 1-5 argument that the increase noise charges do not influence behaviour, nighttime noise has reduced by 20% from the period 2019-2023 during which airport charges were introduced and increased each year.

Table 11: Nighttime Noise

Annual	Total movements	Total night movements	QC (8hr night)	Average QC/mvmt
2019	238 002	29 403	15 787	0.537
2022	210 490	31 284	14 270	0.456
2023	238 109	32 994	14 756	0.448

4.3.5 The increase in noise charges reflect significant spend over and above what has been allocated to noise charges for 2025. Such items include Noise Insulation schemes, staff resourcing, regulatory costs, noise monitoring and the school assistance program. This demonstrates that noise charges are revenue neutral at Dublin Airport which satisfies

Thessaloniki Forum 2021 guidance on Noise modulated charges<sup>9</sup>.

4.3.6 Further Justification in relation to local government policies and wider ICAO principles are provided below.

**(i) Final County Council Noise Action Plan**

Noise charges are aimed to achieve the objectives in the Fingal County Council Noise Action Plan for Dublin Airport 2024-2028<sup>10</sup> published in September 2024. The Noise Action Plan is governed by the European Communities (Environmental Noise) Regulations 2018 which transposes European Directive 2002/49/EC into Irish Law. This Noise Action Plan shows that the number of dwellings and people exposed to aircraft noise of over 50dBA at night (55dBA at day) has increased since 2006 when the first iteration of strategic mapping was carried out. Noise charges are a key part of the Action Plan to address aircraft noise at Dublin Airport and daa propose to increase noise charges again in 2025.

To incentivise a quieter fleet use, noise charges were introduced in 2023. Dublin Airport took a stepped approach to noise charges where initially the surcharge applied only at night-time hours, which was then ramped up in 2024 to 24-hour noise charges. daa now proposes to further increase noise charges in 2025, in line with the stepped approach and accounting for the negative impact on the local community and the daa's obligations. As per the Noise Action Plan (NAP), exposure to nighttime noise in the surrounding community has increased and is a key concern for the Council, daa has increased substantially the night time noise charges. This is consistent with the Thessaloniki Forum 2021 Paragraph 3.7, whereby airport users that cause higher negative externalities through higher noise emissions pay more.

**(ii) ICAO Balanced Approach to Aircraft Noise Management (transposed into Irish Law in Act of 2019)**

Under the Balanced Approach (BA), Dublin Airport and the regulator have 4 pillars for noise management. daa has implemented the second pillar (operational measures) of BA through the reduction of use of the Cross Wind Runway which brought flights over Santry and Dublin City Centre. The third pillar of the BA (Land Use Planning) has been implemented by daa through initiatives such as home insulation, but responsibility for the prevention of the encroachment of new housing lies with Fingal Council. Nonetheless, FCC have found these noise mitigation measures did not achieve the intended nighttime noise impact reductions<sup>11</sup>. Despite the FCC Noise Zones already in place, the population in noise impacted areas has increased recently, without significant total noise emissions. As per the Balanced Approach operating restrictions should only be considered after the other 3 pillars. Given, as evidenced in the Fingal Council 2023 Review of Noise Abatement Measures in Dublin Airport that nighttime noise impact has not been reduced adequately, daa is imposing additional charges to aircraft with higher QCs which negatively contribute to individuals being exposed to 55+ decibel counts at night. If noise charges improve the fleet at Dublin Airport, this would be effective implementation of the first BA Pillar –

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<sup>9</sup> [Pepi 11 2020](#)

<sup>10</sup> [draft Dublin Airport Noise Action Plan 2024-2028](#)

<sup>11</sup> [noise-mitigation-effectiveness-review-report-for-2023.pdf](#)



Reduction of Noise at Source.

**(iii) Aircraft Noise Competent Authority (ANCA)**

These increased charges for louder aircraft at night are consistent with the recommendations of the ANCA specifically sections 8.2 and 9.2:

*'Reduction of noise at source is an important objective. The promotion of quieter aircraft through Page 73 of 80 incentives, particularly at night, such as FlyQuiet programmes or environmental charges schemes should continue to be progressed.'*

The increasing of noise charges this year is consistent with progressing incentives for quieter aircraft.

4.3.7 daa has demonstrated that these noise charges are relevant as they are consistent with the regulation on noise charges, the Noise Action Plan which explicitly recommends incentives as a mechanism to achieve a quieter fleet operation and in turn a reduction in the nighttime decibels the local community is exposed to, which Fingal County Council found was not sufficiently reduced in 2023.

4.3.8 This objectively demonstrates daa's regard for all the relevant regulations and explains how these proposed increased noise charges will lead to an increase in the use of quieter aircrafts. This also complies with the transparency requirement, whereby daa has been very clear in explaining why these charges are needed.

#### **4.4 Low Emissions Aircraft Discount & NOx**

##### **Stage 2 Proposal**

4.4.1 Given the lack of support throughout the consultation process, daa proposed to withdraw the Low Emissions Aircraft Discount (LEAD) and NOx from the start of the Summer 2025 season while keeping an open dialogue with stakeholders on other environmental modulation measures.

##### **Airport User Responses**

4.4.2 All users who addressed the LEAD incentive and NOx in their written submissions supported the Stage 2 proposal of their removal from the start of the Summer 2025 season.

##### **daa Response**

4.4.3 The final proposal is that the LEAD incentive and NOx charge will be removed from Summer 2025, which is unchanged from the Stage 2 consultation position.

#### **4.5 Passengers with Reduced Mobility (PRM) pre-advised rebate**

4.5.1 daa proposed a rebate on PRM charges levied over the year that will be applied to carriers who achieve a pre-advised notification rate target. This initiative was proposed to achieve a higher pre-advised rate to improve the efficiency of the

service, minimize delays for passengers requiring assistance, and by extension support on time performance of flights operating at Dublin Airport.

- 4.5.2 The intention was that a minimum pre-notification of 48 hours<sup>12</sup> would be necessary to avail of the discount. Furthermore, pre-notified users would be provided priority status when availing of the service.

#### Airport User Responses

- 4.5.3 Users 1 and 10 expressed concerns with the PRM charge since US DOT regulations do not require passengers to pre-advise. User 1 suggested that the PRM notification target should be 65% which they state is consistent with Scandinavian airports and they argue that this would drive operational improvements. Users 2, 5 and 6 do not support the PRM pre-notification rates arguing they are already high in Dublin and can't be increased further due to human factors. Users 3 and 4 do not support a PRM banded rate and instead asks for a single flat rate of €0.74. User 7 does not support the increase in the base PRM charge arguing they believe this is due to inefficiency, they also believe that the discount should be below the average cost of providing the service.

#### daa response

- 4.5.4 In order to drive the optimal service level, daa proposes banded rebate targets of 70-80% and greater than 80%. In order to qualify for the rebate, a minimum pre-notification of 48 hours<sup>13</sup> is necessary. Furthermore, pre-notified users would be provided priority status when availing of the service.
- 4.5.5 daa also notes that Users 3, 4 and 7 have objected to an increased base PRM charge, however due to the propensity for individuals to avail of PRM services increasing, the cost of providing this service has also increased, this is reflected in the updated cost model (Table 6: PRM 2025 Charge Calculation). Therefore, daa rejects this is due to inefficiencies, but rather mostly due to more passengers using the service. Any such inefficiencies largely arise from non pre-notification which the banded structure will incentivise a reduction of.
- 4.5.6 US DOT regulations are not relevant as they pertain to US departing passengers (Dublin arriving passengers), whereas the PRM charge is based off departing Dublin passengers. Moreover, passengers travelling to Dublin are subject to Irish and European regulation and not US regulation and therefore this does not fall under the scope of the ACD. daa nonetheless acknowledges the broader point of cultural factors that airport users highlighted which may make it difficult to achieve high PRM pre-adviced rates. However, this is the reason for a banded PRM charge which is to drive behavioural change. daa also conducted a peer analysis as part of the PRM charges proposition and notes that airports such as Heathrow, Manchester, Paris CDG and Orly all provide banded rates for PRM to achieve higher pre-notification.

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<sup>12</sup> Article 6 (2), [eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32006R1107](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32006R1107)

<sup>13</sup> Article 6 (2), [eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32006R1107](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32006R1107)

### Objectivity

4.5.7 With the above considered, daa propose a rebate on PRM charges levied over the year which will be applied to carriers who achieve a pre-advised notification rate target. Table 12 demonstrates that on average for 2024 so far only 32% of average monthly PRM passengers were pre-advised by an airline with over 70% pre-notification. Currently only 8 airlines are in the mid-bracket including User 1 and 9 users being within 10% short of the mid bracket (between 60%-70%). daa believes this provides incentive for the top performers to reach the higher brackets and the lower performers to move into the mid bracket with added incentive to move to the higher bracket. Furthermore, the average cost is €0.85 per passenger, therefore consistent with User 7's request the best achievers do get a discount below average cost.

Table 12: Updated Average Current PRM Prenotification Rates.<sup>14</sup>

Pre-advised rate	Number of Pax	% of PRM pax	Number of airlines
<60%	14,917	40%	31
60-70%	10,632	28%	9
70-80%	12,111	32%	8
>80%	0	0%	0

4.5.8 daa disagrees with User 1 that 65% is a sufficient target. Accounting for User 8's request that the PRM benchmarking be conducted based on figures for the whole year for greater accuracy (rather than September 2024), daa conducted a revised PRM benchmarking exercise with data from January to October 2024. The average percent of pre-advised PRM passengers per month for that period is 64%, therefore contrary to User 1's claim that a rate of 65% would drive operational efficiency, it would simply redistribute the PRM charge to other users without leading to any fundamental changes in behaviour.

4.5.9 Under TF 2018 and ACD Article 10 airport charges differentiation to promote behavioural efficiency is justified. Users 7 and 8 responded in Stage 1 stating that the PRM rates should do just that. However, User 1's proposed rate would not incentivise such behavioural efficiencies and would be inconsistent with TF 2018 as well as Article 10. Hence, daa has applied appropriate thresholds based on the reality of attainability. The rate must be higher than the average rate to incentivise pre-advisement. Moreover, daa would highlight that User 1 achieved an average of 74% pre-advised per month for 2024 YTD, therefore the rate they are proposing would not provide any incentive for them to increase their pre-advised rate. daa has applied two bands to provide incentives for both poor and better performers, this is therefore objective.

<sup>14</sup> Where airline has pre-advised at least 36 hours in advance.

## 4.6 2025 Incentive Schemes

### Stage 2 proposal

- 4.6.1 As part of the Terms & Conditions of Growth Incentive Schemes at Dublin Airport, overall passenger numbers must be increased by a new route. As this is not possible under the passenger cap, daa proposed to cease the award of new growth incentive scheme applications for 2025, pending the outcome of the PATM litigation.

### Airport User Responses

- 4.6.2 There was limited engagement in written submission from Airport Users on ceasing the award of growth incentive schemes. User 8 supported the removal of incentive schemes as with a single till structure, Users who are not availing of incentives pay higher charges for the award of discounts. User 1 and 2 outlined that daa's decision to cease incentive schemes should be reconsidered given the developments in legal proceedings with regards to the S25 slot coordination parameters.

### daa response

- 4.6.3 As outlined, despite recent developments in legal proceedings against slot coordination parameters, the passenger cap still exists and daa is still required to take steps within its control to support compliance. daa's final position remains unchanged in relation to the suspension of growth incentive schemes. The award of incentive schemes related to growth will continue to be suspended.

## 4.7 Airport Charges Differentiation

### Airport User Responses

- 4.7.1 User 9 requested that all airport charge differentiation be justified i.e. a similar cost model exercise that was provided as part of the transfer passenger charge review.

### daa response

- 4.7.2 daa will undertake a similar cost model exercise that was carried out for the transfer passenger charge for other charges to support the objectives of differentiation. The findings will inform proceeding consultations and will be based on the regulatory settlement to be detailed as part of the next IAA Regulatory Determination.

## 5. Updates to Terms and Conditions

### 5.1 Changes to Noise Classification bounds & Minimum Runway Charge

- 5.1.1 There was no user feedback to the changes proposed to Noise Classification bounds and Minimum Runway charge. daa plan to implement the changes that were consulted on in Stage 2. For Further information, please refer to the previous consultation document issued 25 October.

### 5.2 Fast Track

#### Stage 2 proposal

- 5.2.1 In 2023 as part of the 2024 Airport Charges Consultation daa advised that Fast Track T&Cs would be clarified and amended in 2025. As part of the 2025 Consultation daa further consulted on this.
- 5.2.2 daa has proposed to clarify the Terms and Conditions of Fast Track to add clarity to who is actually eligible. The previous terms and conditions were not specific enough, resulting in some airport users extending Fast Track eligibility to users beyond what was consulted on in 2011 when Fast Track wholesale charge was introduced.

#### Airport User Responses

- 5.2.3 User 1 argues that the letter and 2011 Consultation is not relevant to the current regulatory period and they argue that daa is moving Fast Track outside the schedule of regulated charges which they deem is not transparent, Users 2-5 echoed the points made by User 1. User 1 also denies that they have taken advantage of the current T+C's and that frequent fliers were previously granted access.
- 5.2.4 Users 1 and 2 also argue that frequent flier access is crucial to the hub model as they claim it supports repeated travel behaviour. They ask for clarity as to how frequent fliers will be charged following the clarified T&Cs.

#### daa Response

- 5.2.5 daa reject the suggestion that the Fast Track proposal would wrongly remove prices from airport charges regulation, and thereby reduce transparency and other legal protections for airlines. Any commercial agreements for Fast Track access to all fare classes would involve retail sales to passengers (not airlines) and thus could not be subject to airport charges regulation and would benefit from equivalent protections because of Dublin Airport's commitment to equal treatment and transparency. We note that User 1 has not considered the proposal from the perspective of either (i) passengers who are not members of its frequent flyer programmes or (ii) airlines which do not have frequent flyer programmes for which they would like to obtain wholesale access.
- 5.2.6 daa reject the suggestion that there is a conflict between the Fast Track proposal and the commercial strategy to promote Dublin Airport as a hub. The hub strategy requires that Fast Track quality of service / wait times, and the integrity and equality of the wholesale offering, be regularly checked and protected, which is inconsistent with having it available to various frequent flier groups who do not pay a fare premium compared to non-frequent fliers.
- 5.2.7 From 30<sup>th</sup> March 2025 if airport users wish to provide Fast Track access for their frequent

flier members, they will be able to do so either through reaching a separate agreement with daa like other Airport Users have done for non-First/Business class passengers or they can pay the dynamic pricing Fast Track has if they do not wish to enter into a separate agreement with daa.

## 6. Next Steps

### 6.1 Responding to the Consultation

- 6.1.1. Following this Proposal, airport users are invited to submit responses in writing no later than 5pm on the 4<sup>th</sup> of December.
- 6.1.2. A review of Airport User Responses to this Proposal will then dictate a 2025 Charges Decision which will be issued by mid-December.