

Operating Expenditure

APPENDIX



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1. Executive Summary

Dublin Airport's operating cost proposal for 2027–2031 is a proportionate, efficiency-tested response to operating a congested and complex airport, anchored to a stretched baseline and focused on maintaining safe, resilient and affordable services.

The proposed opex framework allows Dublin Airport to operate safely and robustly through a period of significant congestion and construction, supporting 5 million additional passengers and ██████████ in incremental commercial revenue, while maintaining service quality and strengthening security performance through a commitment to process 90% of passengers through security within 20 minutes.

1.1. Purpose and context

This Operating Expenditure proposition has been developed to support the IAA's statutory objectives by setting out a transparent, proportionate and efficiency-tested operating cost framework for Dublin Airport over the 2027–2031 regulatory period. The proposition demonstrates how the airport will meet forecast demand and regulatory obligations while protecting affordability for passengers and airlines.

Dublin Airport's 2026 operating baseline is not fully funded in two critical, service-driving areas: security resourcing is €14m (and >300 FTEs) under-funded and facilities & cleaning is €12m under-funded across pay and non-pay. These requirements were clearly set out in Dublin Airport's 2022 opex forecasting for the current period, and subsequent operating experience has reinforced that they represent necessary costs rather than discretionary uplift. Without this level of frontline resourcing, the airport could not safely and reliably accommodate the passenger growth achieved within a constrained footprint while meeting required service standards; this was evidenced by the deterioration in operational outcomes in 2023 and 2024, including security queue-time under-performance and weaker customer satisfaction results, which required active operational intervention and investment to restore stability.

The strategic context for the proposition is defined by sustained passenger growth, capacity constraints and the related step-change in operational complexity. Dublin Airport is committed to delivering consistently high levels of safety, security and service quality in an environment characterised by infrastructure congestion, evolving security and PRM requirements, aging assets and heightened environmental and resilience expectations. These factors materially shape the nature and scale of operating expenditure required to maintain stable and reliable airport operations.

Against this backdrop, the opex proposal is deliberately anchored to a proven 2026 cost base and focuses on incremental, justified change rather than structural expansion. Core operating costs grow modestly over the period, reflecting largely unavoidable external drivers such as wage inflation, volume-related operating pressures and targeted resilience enhancements. These pressures are partially offset by explicit efficiency targets and the benefits of higher passenger throughput, ensuring that the underlying cost base remains well controlled and predictable.

Costs associated with new security requirements and capital investment are transparently identified and treated separately, ensuring clarity between baseline operating costs and incremental obligations arising from regulatory change and asset expansion. This approach supports regulatory scrutiny and provides confidence that operating expenditure allowances are not overstated.

In parallel, the operating framework enables the delivery of sustained commercial revenue growth, which under the single-till model directly benefits users by reducing the long-run burden on aeronautical charges.

In summary, the Operating Expenditure Proposition reflects a balanced and proportionate response to the challenges facing Dublin Airport. It provides assurance that operating costs are necessary, efficient and aligned with the delivery of safe, resilient and high-quality airport services over the 2027–2031 regulatory period.

1.2. Key themes: Capacity constraints, Passenger-Centric Efficiency, Operational Resilience, Sustainability, Technology and Innovation

The operating expenditure proposition for 2027–2031 is built around six core themes that directly support the IAA's objectives:

- Maintain high quality service standards in capacity constrained infrastructure,
- Protecting passengers and airlines from unnecessary cost escalation,
- Ensuring efficient service delivery, and
- Maintaining safe, secure and reliable airport operations.

These themes explain how the opex programme has been constructed, where cost growth is unavoidable, and how it is mitigated through explicit efficiencies, productivity improvements and disciplined prioritisation.

1.2.1. Capacity constrained operation

Dublin Airport is operating in an environment where existing infrastructure is already stretched beyond its effective design capacity, and this pressure will intensify throughout the coming regulatory period. Passenger growth, evolving behaviours, and heightened service expectations are all converging on assets and processes that are structurally constrained. These constraints are not temporary or easily managed through incremental efficiencies; rather, they represent a systemic limitation that materially affects day-to-day operations, driving longer processing times, increased congestion, and higher resource requirements simply to maintain existing standards. Compounding this challenge is the fact that multiple major capital projects will be under active construction across the campus, reducing operational flexibility, taking stands and terminal areas out of service, and requiring temporary relocations, revised passenger flows, and more intensive operational oversight. The combination of operating above capacity while simultaneously accommodating large-scale construction creates a uniquely challenging environment, one where efficient operations inherently require higher levels of staffing, resilience resources, maintenance interventions, and real-time management to protect passenger satisfaction, safety, and operational performance.

1.2.2. Passenger Centric Efficiency

Efficiency is pursued as a means to deliver a consistently high-quality passenger experience. The operating framework is anchored to a proven 2026 baseline and incorporates explicit efficiency targets, particularly within central functions and maintenance, to ensure that resources are deployed where they add most value to passengers. Cost growth is therefore tightly focused on supporting forecast demand and service obligations, while ensuring that passengers benefit from scale effects as volumes increase. This approach enables the airport to operate efficiently at high levels of utilisation, restraining growth in costs per passenger while maintaining service quality, reliability and value for money.

1.2.3. Operational Resilience

Operating at high utilisation in a capacity-constrained environment increases the system's sensitivity to disruption. The proposition therefore includes targeted, proportionate investments in operational resilience where the risk-adjusted cost to users of disruption (delays, queues, missed flights, service failure) materially exceeds the incremental opex required to prevent it. This is not "gold-plating": it is a controlled approach to ensuring that safety-critical and front-line services remain reliable under stress, and that service quality can be maintained consistently through the regulatory period.

1.2.4. Sustainability

Sustainability is integrated into the operating model with a clear focus on affordability and value for money. The proposition reflects a pragmatic approach where sustainability obligations and initiatives are progressed in a manner that avoids structural uplift to the cost base, with net impacts minimised through operational efficiencies (e.g., energy and resource management) and disciplined selection of measures that deliver measurable outcomes. This ensures environmental commitments are advanced without transferring disproportionate cost burdens onto passengers and airlines.

1.2.5. Technology

Technology related operating expenditure is positioned as an essential enabler of efficiency, commercial revenue growth, resilience and compliance rather than a discretionary enhancement. The opex framework includes provision to operate and maintain critical operational systems and digital infrastructure required for modern airport operations, particularly where this supports regulatory compliance, cyber-resilience, operational continuity and the prevention of disruptive failure events. This reflects the increasing dependence of safe and efficient airport performance on robust, secure and up-to-date systems.

1.2.6. Innovation

Innovation is applied as a practical mechanism to improve productivity, enhance the passenger experience and enable sustainable commercial revenue growth within a constrained operating environment. The opex framework reflects targeted innovation in processes, data and technology that improves throughput, optimises resource allocation and supports more effective use of existing infrastructure. Incremental operating costs associated with commercial activity are directly linked to revenue-generating initiatives and are more than offset by the additional income delivered, which under the single-till model benefits passengers and airlines through lower

long-run aeronautical charges. Innovation therefore plays a dual role in stabilising unit costs and reinforcing affordability, while supporting service quality and operational performance.

1.3. Forecast Overview

Dublin Airport’s proposed operating expenditure per passenger for the 2027–2031 regulatory period shows a modest and well-controlled increase over the period, particularly before the impact of additional assets or new VCP screening requirements is taken into account.

	2026	2027	2028	2029	2030	2031	CAGR
	€	€	€	€	€	€	%
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

On a like-for-like basis, opex per passenger excluding the impact of a congested airport, the Capital Investment Programme and the additional VCP resourcing increases from [REDACTED] [REDACTED]. This limited growth reflects a strong focus on efficiency and cost discipline, despite a challenging operating context. Further cost increases come from the impact of congestion on the operation, changed requirements for VCP screening and the opex related to CIP additions.

The underlying increase is driven primarily by:

- Prevailing wage inflation, and
- The operational reality of an airport already operating at capacity accommodating c.13% passenger growth with limited additional infrastructure delivered in the regulatory period.

In this context, higher activity levels necessitate increased service inputs, such as more frequent cleaning, enhanced wayfinding support and additional customer service resources, to maintain service quality in the increasingly restricted capacity.

Importantly, these opex levels are designed to fully accommodate passenger growth while maintaining service quality at current high levels, ensuring resilience and consistency of the passenger experience in a capacity-constrained environment. At the same time, the proposed operating framework supports the delivery of approximately €89m of additional commercial revenues in real terms over the period, reinforcing the value delivered to both passengers and the wider system.

	2026	2027	2028	2029	2030	2031	CAGR
	€m	€m	€m	€m	€m	€m	%
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

2. Introduction

2.1. Role of Opex within the price cap building blocks

Opex is a central component of the price cap building-block model and plays a critical role in determining the level of aeronautical charges required to operate Dublin Airport safely, efficiently, and sustainably throughout the regulatory period. While capital investment, commercial revenues, cost of capital, and passenger forecasts all shape the final price cap, Opex is the element that directly reflects the day-to-day cost of running the airport and delivering the service levels expected by passengers, airlines, and regulators.

Opex provides the funding necessary to operate the airport in compliance with all safety, security, operational, and environmental obligations. It supports the staffing, systems, maintenance, utilities, and contracted services that underpin the airport's licence to operate and maintains the infrastructure, processes, and capabilities required to meet regulatory, operational, and customer-service standards. Without full recovery of efficient Opex, the airport cannot fulfil its statutory duties nor maintain the operational performance upon which the wider aviation ecosystem relies.

As Dublin Airport operates within a building-block price control framework, the efficient level of Opex allowed by the regulator influences multiple components of the overall settlement. Opex interacts directly with passenger demand and traffic forecasts, scaling as throughput increases and intensifying where capacity constraints require additional operational interventions. Opex also links inherently with the capital programme: constrained infrastructure raises operating costs today, while the delivery of major capital projects within a live airport environment brings additional temporary Opex requirements to enable construction, manage transitions, and maintain service quality.

In the building-block model, Opex also underpins the revenue requirement and therefore influences the calculation of aeronautical charges. Higher commercial revenues can moderate the price cap, but sustainable commercial performance is itself dependent on a stable, high-quality operating environment. Under-funded Opex diminishes the passenger experience, reduces commercial yield, and undermines the broader financial architecture of the regulatory settlement. Similarly, Opex recovery is essential to maintaining financeability: efficient operating margins support credit metrics, borrowing capacity, and the airport's ability to fund and deliver the capital programme Ireland requires.

For these reasons, Opex must be seen not as an isolated line item but as a foundational building block that supports the entire regulatory construct. It provides the operational stability upon which capital investment, commercial activity, financial sustainability, and passenger service quality all depend. This section therefore sets out the principles, drivers, and approach that define Dublin Airport's efficient Opex requirement for the coming regulatory period, ensuring that the price cap reflects the resources necessary to deliver safe, resilient, passenger-focused operations in a capacity-constrained environment.

2.2. Alignment with IAA objectives and regulatory principles

The Opex Proposition has been developed to align directly with the IAA's new statutory duty under the Air Navigation and Transport Act 2022. Under this framework, the IAA's principal objective is

to protect and promote the reasonable interests of current and prospective users of Dublin Airport, while seeking to:

- promote safety and security at the airport;
- facilitate its efficient and economic development and operation;
- promote high-quality and cost-effective airport services; and
- take account of wider Government policy on aviation, climate change and sustainable development.

This objective signals a divergence from any narrow interpretation of efficiency as simply minimising operational expenditure or aeronautical charges. Instead, the IAA's mandate recognises that users' interests are shaped by a broader set of considerations, including passenger expectations, changing demographics, infrastructure constraints, the resilience of operations, and the service proposition delivered in a complex and evolving airport environment. An airport that is safe, resilient, and capable of meeting these standards cannot be assumed to operate at the lowest possible cost, nor should an efficient outcome be defined in those terms.

In this context, the regulator must assess not a hypothetical "steady-state" operation, but how an efficient, well-run airport would be organised today, given the reality of a system operating above its effective design capacity and undergoing multiple, large-scale capital works. The IAA's primary objective therefore provides the latitude, and indeed the requirement, to recognise that efficient operations in the current environment necessarily involve higher levels of Opex than historic ratios alone would suggest.

For this reason, the Opex Proposition reflects the real operational context facing Dublin Airport and the costs required to meet the IAA's statutory duties. This includes allowances necessary to maintain existing service and safety standards in an increasingly constrained physical environment, and costs that enable the airport to run a resilient operation. Security, facilities, cleaning, PRM services, airfield operations, digital systems, and contingency resources must all be appropriately funded to deliver the safety, service quality, and reliability expected of a national gateway.

Additionally, passengers' expectations have evolved significantly. A modern airport must support a wider set of service quality dimensions across cleanliness, wayfinding, digital accessibility, queue-time stability, and special assistance needs. The Opex Proposition therefore incorporates the cost required to deliver service outcomes consistent with these changed behaviours and demands. This reflects the IAA's duty to promote high-quality and cost-effective airport services rather than minimal service at minimal cost.

Practically, this approach requires operational allowances that recognise the pinch points that will continue to arise as long as capacity constraints remain in place. It also requires explicit provision for operational resilience, given the increasing frequency of unexpected events—technology outages, equipment failures, air traffic management disruptions, extreme weather, and energy-supply volatility. These events have become more prevalent in recent years, and resilience cannot be delivered without appropriate and sustained Opex.

Finally, the structure of this Opex Proposition is consistent with established regulatory best practice. It reflects the standard steps followed by economic regulators: assessing base-year efficiency; evaluating potential catch-up efficiencies; applying a forward-looking frontier-shift

challenge; scrutinising company forecasts; allowing for a restricted level of uncertainties through the cost pass through mechanism and completing cross-checks to ensure the overall allowance is both stretching and deliverable. In applying these principles, the Proposition ensures that allowances are evidence-based, transparent, and aligned with the IAA's statutory mandate, while grounded firmly in the operational realities of Dublin Airport today.

In summary, this document has been developed to reflect the IAA's broader statutory objective and the practical requirements of regulating an airport that is simultaneously capacity-constrained, service-critical, and undergoing major transformation. The Opex allowances proposed are therefore those required to deliver safety, compliance, resilience, quality, and efficiency—not in the abstract, but in the real operating conditions that users experience and the IAA is mandated to protect.

3. Operating Context and Experience 2022–2026

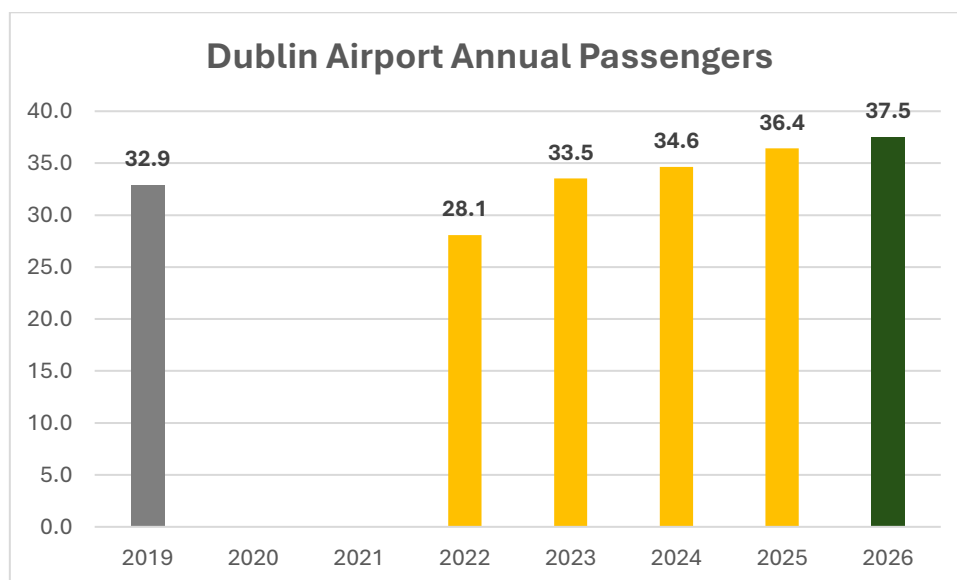
3.1. Traffic recovery post-pandemic

Dublin Airport has benefited from traffic growth since 2022 which has been ahead of both Dublin Airport and IAA expectation and is also ahead of growth levels at most European peers in non-sun destinations. The recovery has been driven by leisure travellers, while corporate travel has been slow to return. This level and growth and change in passenger profile have changed the operational requirements at Dublin Airport as outlined below.

3.1.1. Passenger growth of [REDACTED]

Passenger demand has increased materially over the period, rising by 30% between 2022 and 2025 and projected to reach [REDACTED] by 2026. Traffic volumes in 2026 are expected to be [REDACTED] above 2019 levels. This growth has been accommodated without any increase in terminal capacity and during a period of significant operational disruption, including the full replacement of security search areas in both Terminal 1 and Terminal 2 with next-generation C3 screening technology.

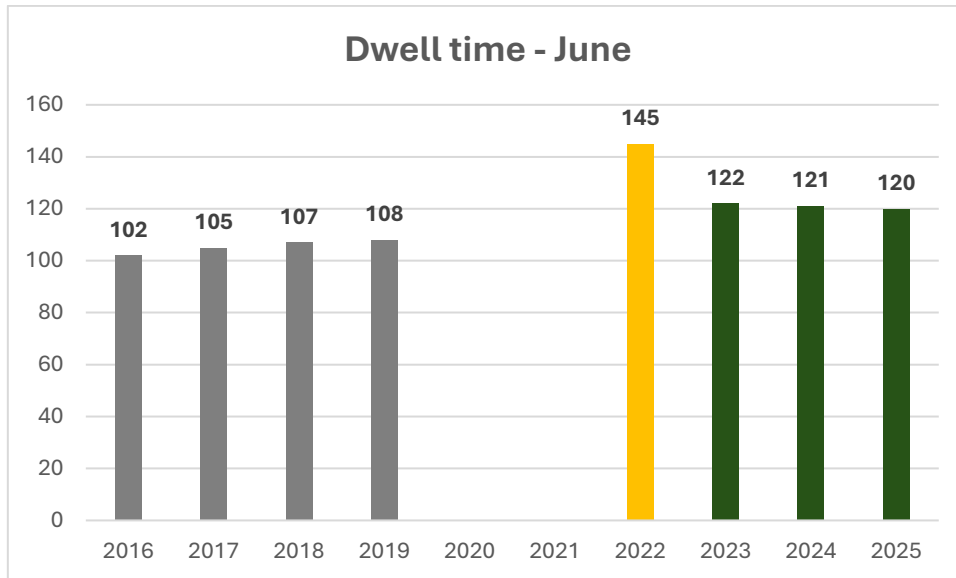
Crucially, this sustained traffic growth has coincided with the complete replacement of security search operations in both Terminal 1 and Terminal 2 with next-generation C3 screening equipment. The transition required the reconfiguration of passenger flows, revised operating procedures, intensive staff retraining and the careful management of commissioning and bedding-in phases, all within live operational environments. Delivering safe, compliant and predictable passenger processing under these conditions has materially increased operational complexity, requiring greater coordination, flexibility and management intervention to maintain service continuity and regulatory performance within an unchanged physical footprint.



3.1.2. Passenger dwell time airside increased by 11%

Dwell time has not normalised to pre-COVID levels. 2025 dwell time¹ was 11% higher than 2019, with the average 2023 to 2025 dwell time 15% higher than the average 2016 - 2019 levels.

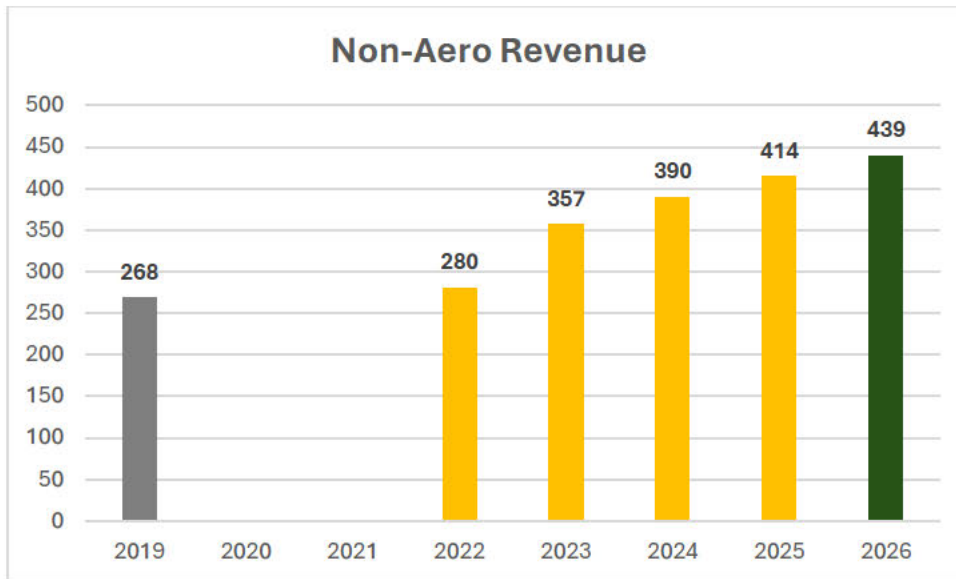
This increase in dwell time compounds with passenger growth, with the airside at Dublin Airport in 2025 23% more busy than 2019, increasing demands on cleaning, maintenance and passenger support.



3.1.3. Non-Aero Revenue increases have been supported by increased opex

Non-Aero revenue has increased materially since both 2019 [REDACTED] and 2022 [REDACTED]. This revenue has driven some higher opex costs through increased direct costs for existing revenue lines (e.g. retail staffing and overhead, lounge operating costs), new direct costs for new revenue lines (e.g. drop and go) and increased workload on the general commercial and retail teams.

¹ Dwell time is measured as the median time between security boarding pass scan and scheduled off-block time.

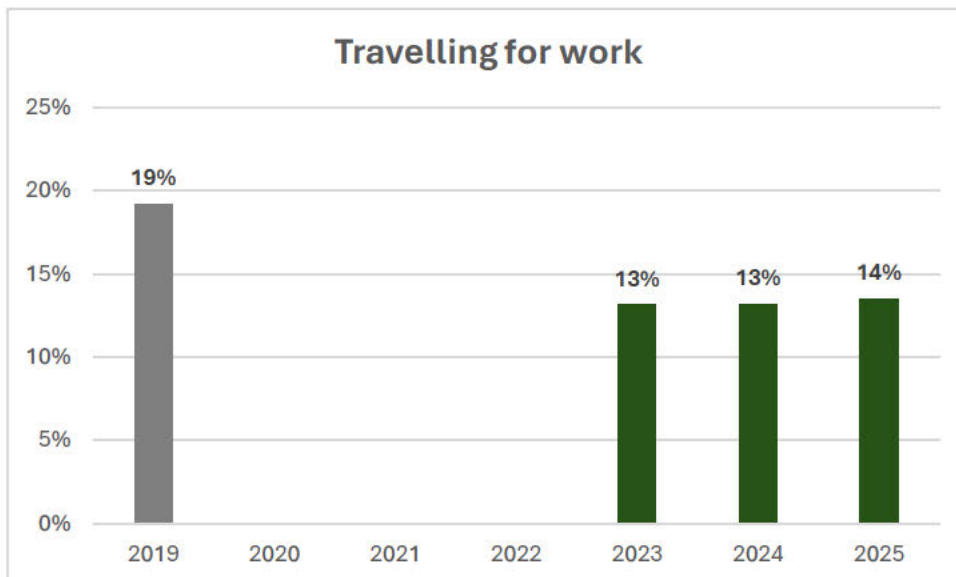


3.1.4. Change in overall passenger type

The type of passenger travelling through Dublin Airport is, on average, less familiar with Dublin Airport and older than pre-covid. A lot of this change is driven by the reduction in business travellers.

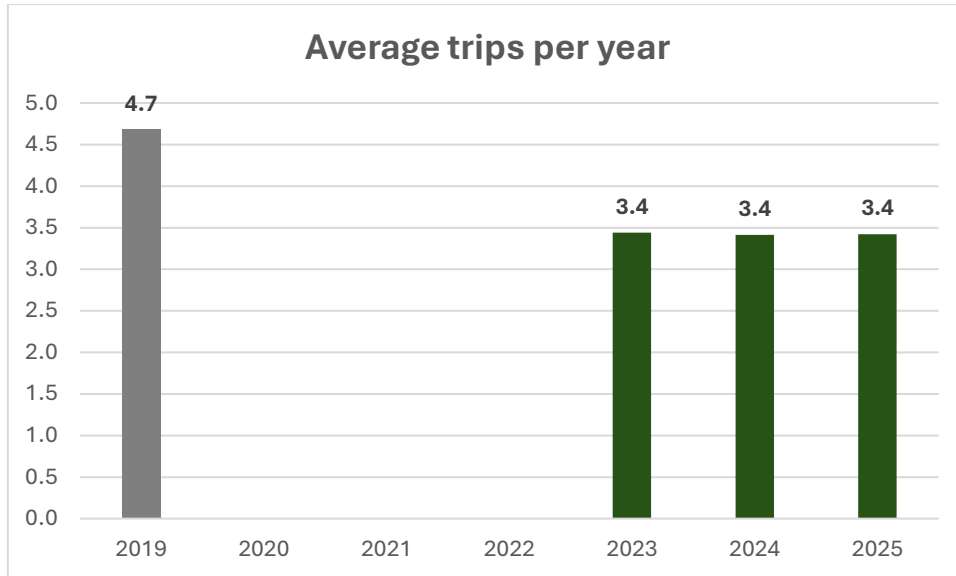
3.1.4.1. Share of passengers travelling for work down 5bps

The share of passengers travelling for work through Dublin Airport has fallen from 19% in 2019 to 13% and 14% in 2024 and 2025. This removes a cohort of travellers that are particularly familiar with the airport layout and procedures, bring less luggage (through carry-on and check-in) and dwell less in the airport.



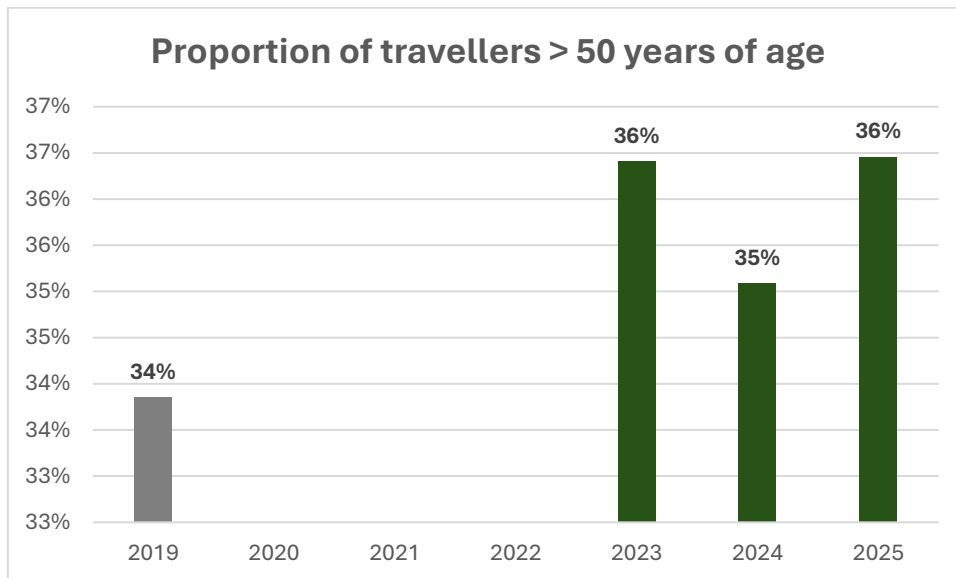
3.1.4.2. Average trips per year falls to 3.4

The average trips through Dublin Airport per year has fallen from 4.7 to 3.4. This follows from the reduction in business travel and demonstrates the reduction in familiarity with Dublin Airport.



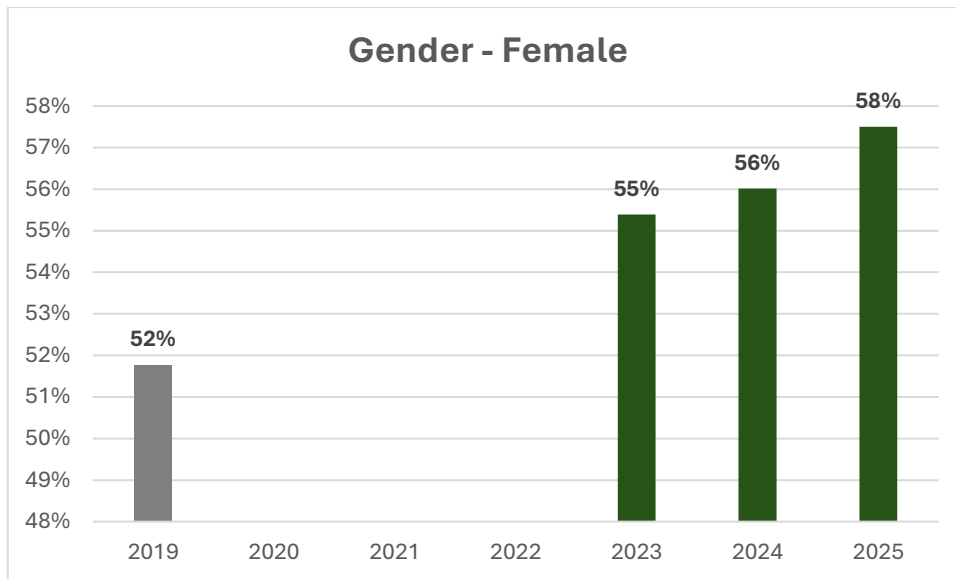
3.1.4.3. Age of travellers increasing

The proportion of passengers aged 50 years and above has increase from 30% - 34% in the pre-covid period to 35% - 37% today. Passengers aged over 65 have increased from 9% - 11% pre-covid to 12% today. The impact of this can particularly be seen in the increased use of PRM services which have increased from 2.1% of departing pax in 2019 to 2.6% in 2025.



3.1.4.4. Increase in proportion of female passengers

The proportion of female passengers has increased from c50% pre-covid to 58% in 2025. As the share of male and female bathrooms has not changed in this period, this increases the cleaning requirement for female bathrooms.

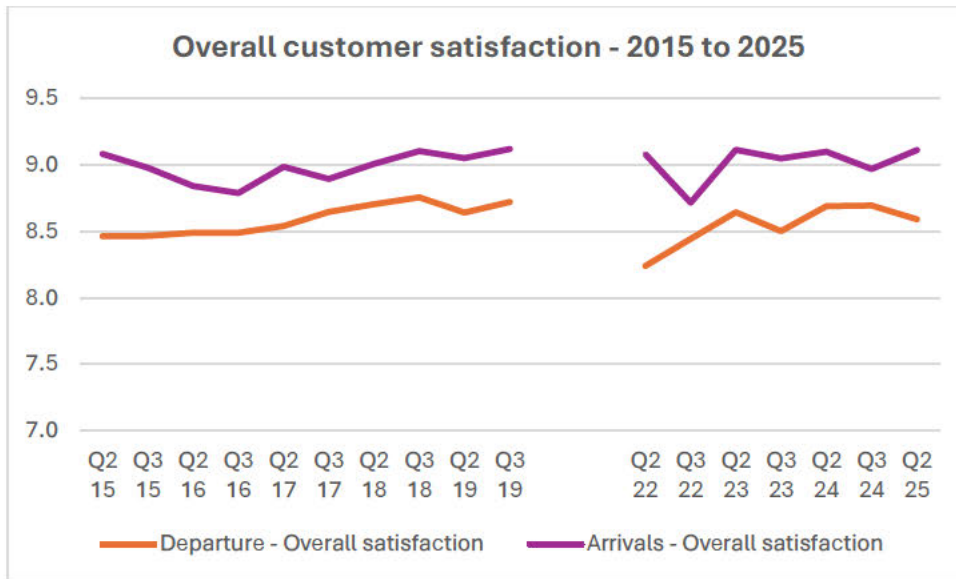


3.2. Operational challenges and lessons learned

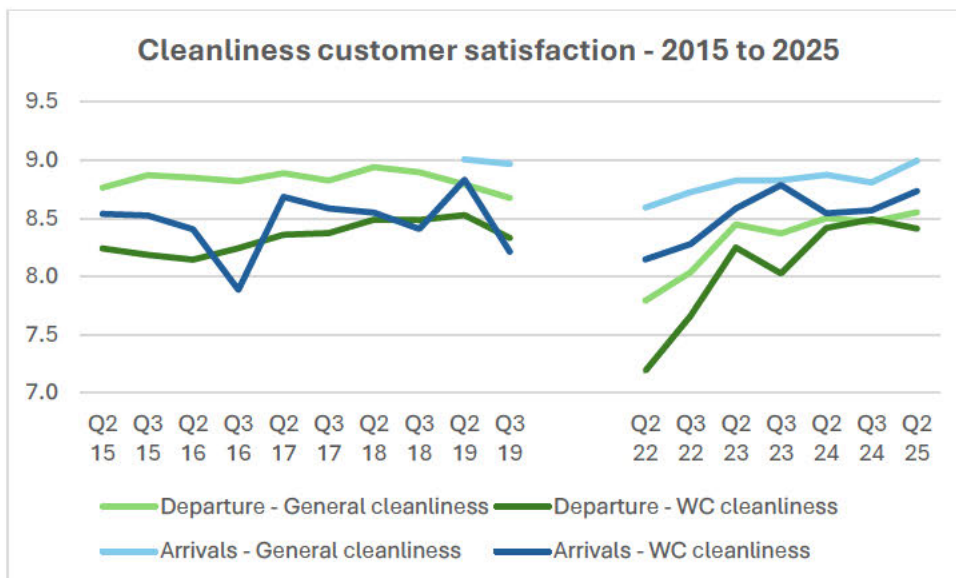
3.2.1. Passenger satisfaction

In 2019, Dublin Airport achieved exceptionally strong passenger satisfaction scores, with overall satisfaction rated at 9.1 for arrivals and 8.6 to 8.7 for departures. These figures reflected a period of consistently high service delivery and robust operational performance. However, by 2022, in the aftermath of the COVID-19 pandemic and its associated operational disruptions, satisfaction levels had declined noticeably. Arrivals satisfaction dropped to 8.7, while departures satisfaction fell more sharply to 8.2, marking a clear shift in passenger perception of the airport experience.

Recognising the scale of this challenge, Dublin Airport initiated a comprehensive recovery programme across 2023 and 2024. This strategy focused on the core elements of the passenger journey most affected during the pandemic: terminal cleanliness, security screening experience, and overall passenger service standards. These areas were prioritised based on their strong influence on customer satisfaction scores and their critical role in shaping traveller confidence and comfort.



A key component of this recovery effort involved restoring cleanliness standards, an attribute particularly visible to passengers and highly influential in shaping their impression of airport quality. During the immediate post-pandemic period, satisfaction with cleanliness had suffered significant declines, falling by 12–14% among departing passengers, who tend to spend more time in the terminal, and by 4% among arriving passengers, who typically engage with fewer touchpoints on their way out of the airport. These declines underscored the operational and resource challenges faced during the crisis, particularly in managing high passenger volumes alongside heightened public expectations for hygiene and sanitation.



Through focused investment, revised cleaning protocols, and enhanced service oversight, Dublin Airport succeeded in rebuilding cleanliness satisfaction to pre-COVID levels by 2024 and 2025. This recovery indicates that the airport has effectively re-established the baseline performance that passengers associated with Dublin Airport prior to the pandemic. However, it is notable that while satisfaction has returned to 2019 levels, it has not exceeded them. This suggests that the current level of cleanliness is meeting, but not surpassing, the standard passengers had come to

expect before the pandemic. In other words, the airport has restored confidence and stability, but further improvements would be required to deliver a step-change beyond historical benchmarks.

In both 2023 and 2024, Dublin Airport Cleanliness of washrooms, along with information on ground transport, were below the Quality of Service target set by the IAA, resulting in a penalties to the price cap.

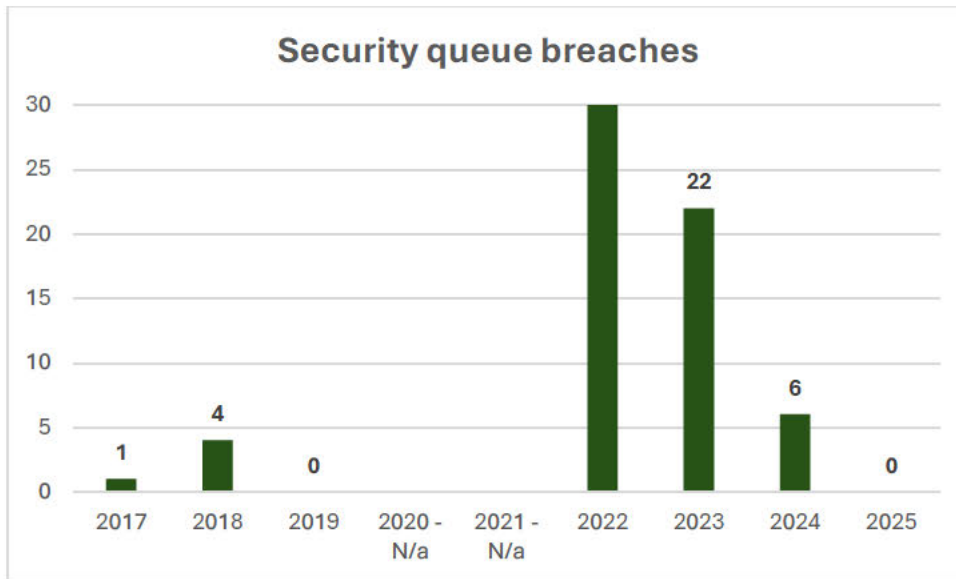
Overall, the return to pre-pandemic satisfaction scores across arrivals, departures, and cleanliness demonstrates that Dublin Airport's recovery plan has been effective in stabilising and restoring passenger experience. The airport now operates at a level consistent with its 2019 performance, reflecting both successful operational recovery and the resilience of its service model. Continued progress beyond these baseline levels will depend on further enhancements in service quality, continued investment in facilities, and an ongoing focus on elevating the passenger journey in ways that exceed, rather than simply meet, established expectations.

3.2.2. Security queue times

Prior to the pandemic, Dublin Airport's security operation consistently delivered strong performance, with minimal breaches of agreed queue-time standards. In the years since the pandemic, however, the operating environment became significantly more challenging. Dublin Airport was managing a combination of factors: the need to rebuild staffing levels, shorter average staff tenure, and enhancements to security standards all while delivering the roll out of new C3 technology in the live operation.

Recognising this environment, Dublin Airport set a clear objective for 2025: to stabilise the operation and deliver measurable improvements in security throughput. This effort focused on adequate resourcing, improved training, while delivering the progressive rollout of C3 security screening technology. These targeted interventions were designed specifically to restore performance to pre-pandemic levels and to create capacity for future growth.

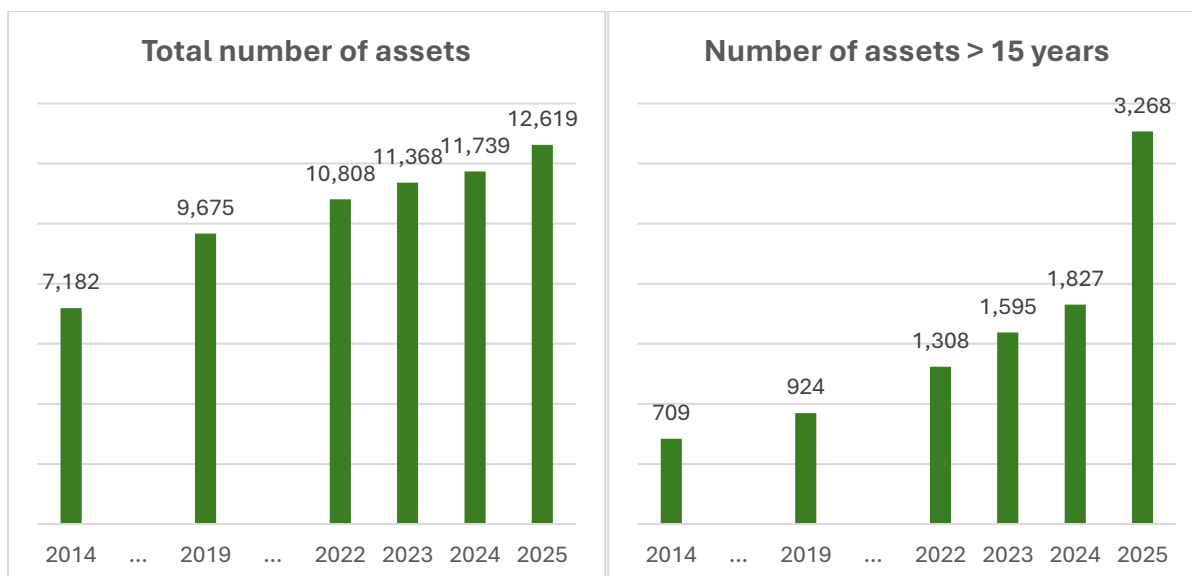
As shown in the graph below, 2025 marks the first year since 2019 in which Dublin Airport achieved zero security Service Quality Metric queue time breaches. This milestone demonstrates that the combined investment in people, processes, and technology has enabled the security operation to fully meet customer demand for the first time in six years. It also highlights the effectiveness of the strategic improvements implemented throughout 2025.



3.3. Asset reliability

Maintaining critical assets is essential to the safe, secure and reliable operation of Dublin Airport, as these systems underpin core functions including passenger processing, security screening, baggage handling, airfield operations and utilities. Asset reliability is therefore not simply an engineering outcome; it is a direct determinant of service continuity, operational performance and compliance. In a high-utilisation environment, reduced asset availability can translate quickly into congestion, service degradation and recovery activity that materially exceeds the cost of maintaining reliability through planned interventions.

First, Dublin Airport’s asset reliability challenge has become structurally more complex because the size and age profile of the asset estate has shifted materially in recent years. The airport’s asset base has increased by 17% in absolute terms, and the proportion of assets in later-life stages has risen significantly, with the share of assets over 15 years of age increasing from 12% in 2022 to 26% in 2025. This profile change increases maintenance intensity in two ways: it raises the volume of planned preventative activity required to sustain availability (more frequent inspections, servicing and component replacement) and increases the likelihood of reactive intervention as assets age and failure risk rises. These pressures are not discretionary as many of the affected assets remain operationally critical and must remain in service to protect safety and passenger outcomes.



Second, Dublin Airport’s experience in 2024 highlighted the operational sensitivity to discrete reliability events through two critical asset failures, including the failure of key security equipment and the failure of a backup generator to operate as intended. These incidents resulted in operational disruption and heightened scrutiny of resilience arrangements, reinforcing that asset reliability has immediate operational consequences, particularly where a failure affects regulated processes or critical utilities. They also underlined the importance not only of preventative maintenance programmes but of rapid detection, escalation and response capability when faults do occur.

In response to these 2024 incidents, Dublin Airport increased operating expenditure to strengthen monitoring, specialist support and service level arrangements in high-risk areas, including Hold Baggage Screening (HBS), Central Search and the Medium Voltage (MV) power network. The objective of these measures is practical and outcomes-focused: to reduce response times, improve fault resolution capability and limit the duration and knock-on impact of future incidents on passenger processing and service quality performance.

3.4. Impact of inflation and cost pressures

3.4.1. Inflationary and Wage Cost Pressures

Since 2022, Dublin Airport has operated in a sustained inflationary environment. Consumer Price Index (CPI) inflation has totalled 11% between 2022 and 2025, and 22% since 2019. Wage inflation has risen even more sharply, increasing 14% between 2022 and 2025 and 30% since 2019, placing significant cost pressure on labour-intensive operations.

A key driver of this wage pressure has been the substantial uplift in statutory and sectoral minimum pay rates. The Irish National Minimum Wage, which has a material impact on Dublin Airport’s operational workforce, has increased by 44% since 2019 and 35% since 2022. In parallel, the Employment Regulation Order (ERO)—which sets minimum pay rates and conditions for

specific sectors—has increased pay for the cleaning sector to €14.80 for 2026, representing a 37% rise since 2019 and 29% since 2022.

3.4.2. Cost Base Exposure

Dublin Airport’s cost structure is highly sensitive to these developments.

- 54% of the airport’s total cost base relates to direct staff costs, and
- a further ~50% of non-pay expenditure is linked to labour-based contracted services, including cleaning, PRM support, and on-site maintenance.

This combination means that increases in statutory wage floors, ERO rates, and general wage inflation have a direct and immediate impact on the airport’s operating cost profile.

3.4.3. Operational Pay Rate Adjustments

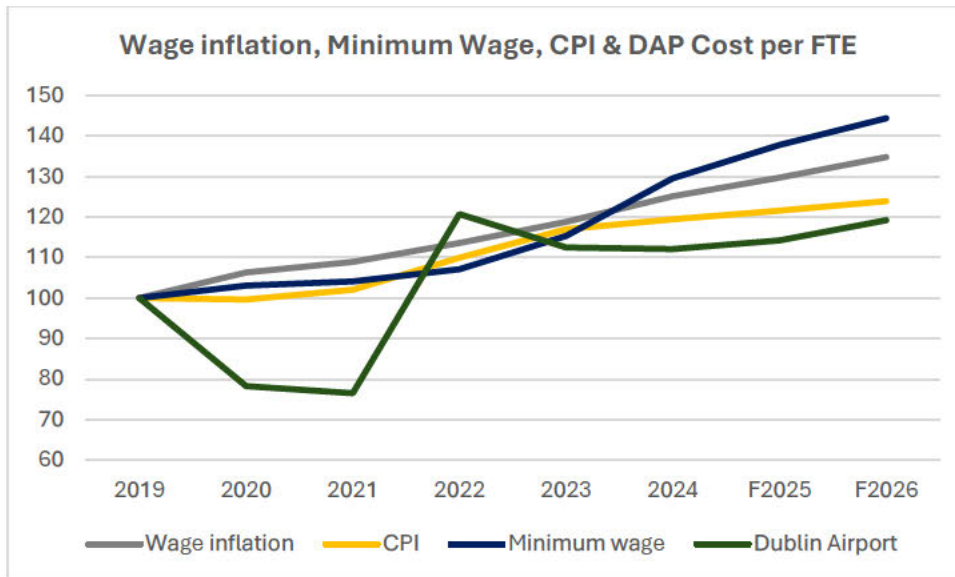
In response to rising minimum wage levels and competitive labour market conditions, Dublin Airport has implemented proportionate pay adjustments for its own operational roles. Between 2022 and 2026, the starting rate for core operational positions has increased [REDACTED]. These adjustments were agreed through a three-year pay deal with unions in 2023, designed to maintain recruitment competitiveness and operational stability while ensuring affordability.

3.4.4. Impact on Average Employment Cost

Despite these upward pressures, the airport’s average employment cost per FTE has increased at a more measured pace, partly due to higher staff turnover in recent years.



This relative moderation reflects a workforce profile with a higher proportion of staff turnover at entry-level rates, while also resulting in operational challenges associated with maintaining service quality during periods of elevated turnover.



1.1.1 Impact on Non-Pay costs

The direct impact of this level of inflation can be seen within Dublin Airport’s non-payroll costs. It is particularly visible within the cleaning contract which is linked to the cleaning ERO rates and also within the PRM cost which has been recently retendered with the cost per user increasing by 6%. Material increases have also been seen across asset care tender returns.

- Regulatory compliance developments

Dublin Airport operates within a highly structured and increasingly demanding safety and security regulatory environment. Oversight is led by the Irish Aviation Authority (IAA), which carries statutory responsibility for:

- Civil aviation safety regulation, including licencing, airworthiness, and aerodrome oversight; and
- Civil aviation security oversight, including inspection and audit of airports, air carriers, cargo handlers, and airport suppliers.

These functions are delivered under a framework aligned with ICAO, EASA, ECAC and EU regulations. Recent regulatory developments have strengthened both the scope and depth of compliance expectations, reflecting global trends in risk-based and performance-based oversight.

3.5. Developments in Safety Regulation

The IAA’s State Plan for Aviation Safety (SPAS), covering the 2023-2025 period, outlines a series of safety management and aerodrome-specific actions that directly affect Dublin Airport. Key areas include:

- Implementation of risk-based and performance-based oversight, requiring enhanced reporting, data analytics, and internal quality assurance systems.
- Integrated safety and security risk management, increasing expectations for cross-domain coordination within the airport’s operational governance framework.

- Aerodrome-specific obligations, including runway safety, ground operations oversight, wildlife hazard management, and airside incident prevention.

These requirements necessitate continued investment in training, competency development, safety systems, monitoring tools, and airside operational controls. They also expand Dublin Airport's internal compliance workload, particularly in relation to documentation, audit readiness, and continuous performance improvement.

3.5.1. Developments in Security Regulation

Security regulation has similarly intensified, shaped by evolving EU aviation security legislation and by strengthened national oversight. Recent developments include:

- Temporary EU security restrictions affecting passenger screening protocols (e.g., liquids, aerosols, and gels), requiring rapid operational and communications adjustments.
- Increasing regulatory emphasis on the deployment of advanced screening technologies, including next-generation computed tomography (C3) equipment, to enhance detection capability and resilience.
- Expansion of audit and inspection activity by the IAA across all security-critical areas, including airport screening operations, access control systems, hold baggage processes, cargo security, and supply-chain partners.

A very significant change is expected to be announced in 2026 in relation to the screening of airport supplies where the IAA still intends on introducing a 100% screening requirement. The change is expected to move airside screening from 25% today progressively to 75% by 2031 and 100% in 2032.

These combined requirements drive both capital expenditures, particularly in screening lanes, equipment and associated infrastructure, and ongoing operational cost increases relating to staffing levels, training, and compliance systems.

3.5.2. Cost Base Implications

Safety and security regulation is a structural driver of Dublin Airport's cost base. Key impacts include:

- Increased staff requirements across security screening, airside operations, compliance, and quality assurance to meet regulated service levels and audit standards.
- Higher training and competency maintenance costs, aligned to regulatory expectations for professional standards and continuous development.
- Capital expenditure obligations, particularly the rollout of C3 screening technology, upgrade of airside safety systems, and modernisation of compliance and reporting tools.
- Greater operational overhead, arising from recurrent audits, inspections, enhanced documentation requirements, and more intensive monitoring and control activities.

These regulatory obligations are mandatory, non-discretionary, and fundamental to the safe and secure operation of the airport. They also represent a growing portion of operating expenditure as both EU and national frameworks continue to evolve.

3.6. Sustainability progress and commitments

daa's ESG Strategy 2024–2030² sets out a clear and purposeful response to the dual challenge of sustaining Ireland's vital global connectivity while accelerating the transition to a more sustainable airport system. It articulates a long-term vision in which daa continues to enable economic growth, support communities, and connect people, but does so by embedding sustainability into every aspect of its operations. This strategic direction recognises that environmental pressures, societal expectations, and regulatory requirements are intensifying, and that the business, primarily at Dublin Airport, must move decisively to lead the sector in sustainable airport practices.



The strategy is anchored in three mutually reinforcing pillars: Climate & Environment, People & Community, and Good Practices.

- The Climate & Environment pillar commits daa to reducing its carbon footprint, adopting cleaner technologies, expanding on-site renewable energy generation, and embedding circularity across materials and waste systems.
- The People & Community pillar focuses on developing a diverse, inclusive, and high-performing workplace while deepening the organisation's long-standing commitment to local communities.
- Meanwhile, the Good Practices pillar emphasises robust governance, transparency, and ethical decision-making, ensuring ESG principles guide capital allocation, operational planning, and risk management across the Group.

Dublin Airport enters the 2024-2030 period with a strong track record of ESG delivery, having made meaningful progress between 2021 and 2023. The organisation advanced sustainable mobility initiatives, such as developing a Mobility Management Strategy, improving facilities for active travel, and supporting lower-emission commuter options, while simultaneously strengthening community programmes. These included consistent annual investment of €300,000 through the Dublin Airport Community Fund, support for ten DCU Access Programme students each year, and the continuation of daa's staff charity and volunteering initiatives. Dublin Airport also advanced noise-mitigation measures, including insulation supports for eligible local

² daa ESG Strategy

homes, and made progress on sustainable sourcing within its retail operations. These achievements provide a credible platform from which the new strategy can scale ambition and impact.

Delivery of the 2024–2030 strategy is underpinned by a clear governance and reporting framework designed to maintain transparency and accountability. Progress will be monitored through established committee structures, with public reporting in the Annual Report and interim ESG updates scheduled in 2026 and 2028. An online ESG platform will also be launched to provide accessible, ongoing visibility of commitments and performance. This disciplined approach ensures that ESG remains a core business lens, informing infrastructure planning, capital investment, operational decisions, and stakeholder engagement, ultimately enabling daa to deliver sustainable, responsible growth through 2030 and beyond.

Operating cost commitments related to ESG include:

- Dublin Airport local schools €2m
- Dublin Airport community fund (€400k)
- Apprenticeship
- €420k Scholarship Fund and double the number of student placements
- 2100 volunteering days
- Disability / hidden disability training delivered to 2000+ staff
- 100% compliance with CSRD and work towards closure activities
- ESG / Sustainability evaluation criteria to be included in 100% of public tenders
- Continued roll out of EV across daa and 3rd party fleets (e.g. bussing).

Further costs are set to arise from increased charges on water drainage which are being implement from 2026 onwards.

4. Operating Impact of Capacity Constraints at Dublin Airport

This section sets out how Dublin Airport's existing capacity constraints are already shaping day-to-day operations and why continued passenger growth through the next regulatory period will require disproportionately higher operating inputs than would be expected in an unconstrained airport. Dublin Airport's Opex proposition is anchored to a proven 2026 baseline and is deliberately framed around incremental, justified change rather than structural expansion. However, the operating environment is not steady-state. The airport is already operating at high utilisation and within a constrained footprint, and this is compounded by the requirement to maintain service quality and safety during a period of material live construction and operational reconfiguration.

The practical implication is that incremental passengers are not absorbed smoothly through spare capacity. Instead, they are absorbed through operational interventions: queue management, crowd safety controls on busy piers and at gates, remote stand bussing and towing, more intensive cleaning cycles, additional wayfinding and customer support, and tighter landside/kerb/car-park management to prevent congestion spillback and service degradation. As the system moves closer to its effective limits, Opex requirements rise in a non-linear way because the airport must spend more effort simply to maintain safe, stable, and predictable performance at each point of the passenger journey.

4.1. Current operating situation: constrained headroom

Dublin Airport's recent operating experience is defined by rapid traffic recovery and growth being delivered within an unchanged terminal footprint. Passenger volumes have increased materially since 2022 and are forecast to reach approximately 37.5m in 2026, which is above 2019 levels, while the airport has simultaneously delivered major live operational changes (including the full replacement of security search operations across both terminals). In parallel, airside dwell time has not normalised to pre-COVID levels and remains higher than historic benchmarks, which increases density and the intensity of terminal use, driving additional demand for cleaning, facilities and passenger support services.

The CIP27 capacity assessment reinforces that the airport's binding constraints are not best understood through annual passenger totals alone. Planning is driven by peak-hour throughput and the way in which peak demand is distributed across the day. The report anticipates that the current peak hour will increasingly extend throughout the day, filling gaps at gates and stands and raising peak intensity across multiple processors. In this context, "capacity constraint" becomes a system characteristic: local congestion at one processor quickly spills into adjacent areas (circulation space, piers, gate lounges), triggering wider operational disruption unless actively managed.

Airport Systems Capacity RAG Assessment

Terminal 1	Today	2032+
Check-in	Green	Yellow
Check-in	Green	Green
Security (CSA)	Green	Green
Fast Track (Mezz)	Green	Green
IDL (Population)	Green	Yellow
Immigration (Pier 1 and 2)	Green	Green
Immigration (Pier 3)	Green	Green
Baggage Reclaim	Green	Green
Gates	Red	Red
Stands	Red	Red

Terminal 2	Today	2032+
Check-in	Yellow	Red
Sortation	Yellow	Red
Security	Green	Green
IDL (Population)	Green	Green
TSA	Yellow	Yellow
CBP	Red	Red
Transfer	Green	Yellow
Immigration	Green	Green
Baggage Reclaim	Green	Green
Gates	Red	Red
Stands	Red	Red

The report identifies several specific pinch points that illustrate how constraints show up in practice today:

- Terminal 2 check-in is nearing capacity at peak times, with queues overflowing into circulation and obstructing access to vertical circulation routes.
- US Preclearance (TSA/CBP) experiences peak pressure, with TSA/CBP queues shown to exceed current facility capacity in peaks and overflow into adjacent Pier 4, obstructing circulation and degrading transfer performance. Remote CBP bussing is now a requirement for the CBP operation.
- Gates and stands are under increasing strain, with peak demand managed through careful scheduling and extensive towing; shortages of contact stands are particularly acute during peak periods and for US-bound operations.
- Kerbside and surface access are constrained by space limitations, with additional passenger drop-off lanes described as not feasible; the emphasis is therefore on “soft” operational measures to improve kerb efficiency, dwell time and safety.

- Public transport facilities (bus/coach) are operating close to capacity and lack modern amenities, reinforcing the need for active management of flows and crowding.
- Car parks are described as fully utilised during peak periods, which materially changes how the car parking system must be managed operationally to avoid excessive circulation, customer frustration and landside congestion.
- The airfield’s binding constraints are increasingly the availability and operational fit of stands (with the heaviest reliance on contact stands adjacent to the piers, and a specific operational limitation that only Pier 4 contact stands are suitable for US Pre-Cleared departures, increasing pressure on that subset) and, in parallel, taxiway layout constraints around the pier complex, where the capital programme explicitly seeks to avoid repeating the existing “single taxi lane cul-de-sacs” between Piers 2–3 and Piers 3–4 by enabling more efficient aircraft movements in/out of the apron system.

These constraints are further compounded by the requirement to deliver and stage significant construction works on a live campus. The Opex proposition already recognises that multiple major capital projects will be under active construction, reducing operational flexibility, taking areas out of service, and requiring temporary relocations and revised passenger flows. As a result, the airport must operate not only at high utilisation, but at high utilisation with reduced slack and frequent operating-model change, conditions that inherently increase the operational resource required to maintain stable outcomes.

4.2. How passenger growth will impact operations

The operational impact of growth is not evenly distributed. In constrained conditions, the marginal passenger disproportionately increases workload at “interfaces” in the passenger journey—where processes join, where circulation space narrows, and where safety and service quality depend on active control. The following sub-sections set out the main areas where growth toward ████████ passengers will most directly increase resourcing requirements.

4.2.1. Terminal processors: check-in, security, immigration, and US Preclearance

4.2.1.1. Check-in

Check-in operates close to capacity during peak periods and, as passenger volumes and flight frequency increase, the operational challenge is shaped not only by transaction throughput but also by the way check-in infrastructure must be actively reconfigured to match the live schedule. A key feature of the Dublin Airport operating model is the management of common-use check-in desks, including the controlled changeover of desk banks between airlines as peak waves progress through the day. These changeovers require coordinated planning, on-the-ground supervision and rapid issue resolution to ensure that desks, systems and queue layouts are available for the next airline without creating spillback into circulation areas. As the schedule becomes denser and more tightly packed, the frequency of these common-use transitions is expected to increase, reducing operational slack and increasing the need for dedicated check-in hall management, queue marshalling and floorwalking support (particularly around self-service and bag-drop) to maintain safe flows and stable service outcomes.

The continuing shift toward leisure and VFR travel increases both the prevalence and intensity of trolley usage, driven by larger baggage volumes, family groups and longer-stay trips. In a constrained terminal footprint, trolley availability becomes a visible and operationally important

service enabler: shortages create friction at kerb, check-in and circulation pinch points, while unmanaged accumulation can obstruct routes and exacerbate congestion. Maintaining service levels therefore requires more active trolley circulation management—higher-frequency collection and redistribution cycles between kerbside, car parks, check-in halls, and arrivals reclaim (supported by rapid removal of damaged units and tighter control of trolley “hot spots” during peak waves).

As overall throughput and peak density increase, the operational burden shifts toward sustaining safe and predictable circulation, particularly where queues and dwell areas encroach on walkways. This increases the demand for visible customer service presence (to direct passengers, reduce hesitation at decision points, and manage re-routing during disruption), as well as additional “soft” crowd management to keep routes clear and prevent congestion spillback. It also drives a step-up in circulation-area cleaning intensity: higher footfall and longer dwell times increase litter, spill risk, washroom pressure and touchpoint use, requiring more frequent patrols and rapid-response cleaning to protect safety and maintain service quality.

Ensuring these elements are well managed also has a direct knock-on effect on the security operation: stable, well-controlled flows reduce bunching at the security interface, improve passenger preparedness, and help maintain steady lane utilisation, whereas congestion and confusion upstream can quickly translate into surges, queue spillback and increased intervention requirements at security.

4.2.1.2. Security

While security capacity has been enhanced through the C3 programme, operational performance depends on ensuring staffing levels and flow management are aligned with peak presentation. The operating context described in this Opex proposition reflects that delivering predictable processing in a live reconfigured environment requires greater coordination, flexibility, and management intervention. In constrained terminals, small deviations in passenger presentation or lane availability propagate quickly into upstream queues and downstream crowding; resourcing needs therefore extend beyond lane staffing to include queue control, passenger preparation support, and supervisory oversight to keep throughput stable and avoid service-quality penalties.

Looking ahead, Dublin Airport expects that the significant investment made over 2022–2026 in screening equipment, training capability and the recruitment of additional frontline resources will provide a more stable operational baseline for the next period. On this basis, and subject to the realised passenger mix, presentation profile and any further regulatory change, the airport does not currently anticipate a material step-change in core security resourcing requirements solely as a result of passenger growth. However, this position remains dependent on continued operational learning and the bedding-in of newer technologies and processes, and will be kept under review in light of peak-hour conditions and emerging compliance obligations.

4.2.1.3. US TSA/CBP Preclearance

US processing is a direct example of non-linear operating pressure. Peak TSA/CBP demand has exceeded current facility capacity where queues overflow into Pier 4 and obstruct circulation, driving poor passenger experience and undermining time-sensitive transfers. As passenger volumes rise, the operational consequence is not merely longer queues; it is higher risk of “system interference” where CBP queues compromise pier circulation, gate access and boarding

readiness. This increases the need for dedicated queue management, passenger communications, active crowd control, and rapid escalation capability to maintain safe and reliable operation at peak waves.

In addition, Dublin Airport's planned expansion of the TSA/CBP facility introduces a further operational overlay that will persist throughout the delivery period. The programme envisages a significant extension to provide additional queue space, expanded CBP processing capacity and improved post-preclearance circulation and waiting areas. Delivering this project in a live terminal environment will require phased construction, temporary re-routing and heightened operational coordination to protect safety and service continuity, with construction-related constraints expected to impact day-to-day operations through to around 2030. Once operational, the expanded facility will also create an enduring increase in the operational footprint that must be managed and maintained: additional passenger areas and processor space will require higher ongoing inputs for cleaning, facilities attendance, wayfinding and crowd management, alongside the staffing and oversight required to operate and supervise the expanded processing and queue environment at peak times.

4.2.2. Piers, gates and stands: the binding constraint and the growth amplifier

Gates and stands represent "hard" capacity constraints because they are fundamentally allocation-limited. The CIP27 report highlights rising demand during peak hours, with operations managed today through careful scheduling and extensive towing, and it notes that some gate facilities are outdated and undersized for modern high-capacity aircraft, contributing to congestion and inefficiency. As peak utilisation increases, the airport has less ability to absorb delays, and small disruptions cascade rapidly across the stand plan.

In practical operating terms, growth toward [REDACTED] passengers increases resource needs in three main ways:

- More active pier and gate management. As peak utilisation intensifies, constrained pier circulation and gate seating areas require more active management to maintain safe densities, keep egress routes clear and prevent boarding queues from spilling into main corridors. This need is reinforced by the recent rise in public order and disruptive behaviour incidents reported at Dublin Airport, including highly visible gate-area incidents and a marked increase in disruptive passenger behaviour handled by airport policing and Gardaí. Accordingly, additional pier and gate resourcing is required for proactive crowd control, rapid incident response, and closer coordination with airlines on boarding call-forward and gate change management to protect both safety and service continuity during peak waves.
- Higher reliance on operational workarounds. Where contact stands are constrained, the system relies more on towing, stand swaps and remote operations to make the schedule work. These workarounds are labour-intensive and increase the demand for operational coordinators, stand control, and real-time decision support.
- Increased remote stand bussing intensity. As peak stand and gate capacity tightens, remote stand operations require more frequent, tightly coordinated bussing, which is labour-intensive and time-critical. This includes active management of the Gate 335 bussing operation to the South Gates Passenger Boarding Zone (covering passenger marshalling and queue control at the gate, dispatch coordination and real-time

communications with apron operations, and safe passenger movement at both the gate and stand interfaces). As volumes rise, these movements increase in frequency and complexity, driving additional resourcing to protect punctuality, maintain safe crowd densities in constrained areas, and ensure consistent service delivery, including for PRM passengers.

4.2.3. Airside Operations

Dublin Airport's airfield is already operating at high utilisation, with limited operational headroom. In this context, passenger growth increases the intensity of stand and taxiway utilisation and reduces the system's tolerance to minor disruption. At the same time, the operating environment is compounded by multiple major capital projects being delivered on a live campus, which reduces operational flexibility and periodically takes operational areas out of service, requiring temporary reconfigurations and more intensive oversight to maintain safe and predictable outcomes.

The practical implication is that airside performance increasingly depends on active operational intervention and higher coordination overhead. Where stands, apron taxiways, taxiways or links must be taken into possession to facilitate construction, the impact on stand planning and aircraft routing must be assessed and governed through established airfield planning and safety forums. In addition, where it is not practical to provide diverted taxiway/taxilane routings during works, the operating model explicitly relies on "Follow Me" mitigations (approval and planning in advance, and temporary follow-me guidance/markings as agreed through risk assessment), increasing the demand for Follow Me escorts as construction interfaces intensify.

4.2.4. Surface access, kerbside and taxi rank: constrained space, higher flow management

Expanding passenger drop-off lanes is not feasible due to space limitations. The airport will have to rely on "soft initiatives" to improve kerb efficiency and safety and manage vehicle dwell times. As passenger volumes rise, constrained kerb and forecourt space increases the risk that congestion spills back into the road network and undermines punctuality and passenger satisfaction.

Operationally, this drives increased resourcing requirements for:

- kerbside stewarding and traffic marshalling,
- taxi rank management and dispatch coordination, and
- passenger assistance at kerb pinch points to reduce dwell time and improve circulation.

Public transport is also under pressure: the report notes that bus/coach operations are close to capacity and do not provide modern amenities, implying both a capacity and service-quality challenge. This elevates demand for passenger information support, queue/crowd management at stops, and active incident handling during peaks or disruption.

4.2.5. Cleaning and facilities: density effects and service quality protection

Higher passenger volumes in constrained circulation space translate into higher service intensity requirements rather than simple linear scaling. This document already sets out that cleaning requirements must be adjusted for passenger density, peak usage and constrained circulation and that the model includes targeted adjustments for pinch points in high-density areas.

As the airport moves toward [REDACTED] passengers without a corresponding step-change in available space, three effects intensify:

- More frequent washroom and touchpoint cleaning cycles because density increases usage rates and the visibility of cleanliness standards;
- More rapid response interventions because spills, litter build-up and minor failures become operational blockers in constrained routes; and
- Higher facilities attendance to monitor the performance of lifts, escalators, doors, HVAC and critical services available under greater utilisation and reduced slack.

These requirements protect service quality and prevent the “hidden cost” of under-resourcing, where small failures escalate into queue growth, crowding and disruption that is more expensive to recover from.

4.2.6. Car park management: peak full utilisation changes the operating model

The CIP27 report describes car parks as fully utilised during peak periods, while acknowledging continued demand for both passenger and staff parking due to travel patterns and limited public transport options in certain time windows. In high-occupancy conditions, car parks require more active operational control to avoid excessive circulation (customers searching for spaces), prevent internal gridlock, and maintain safety for pedestrians and vehicles.

This changes resourcing requirements in two distinct ways:

- Security and passenger safety: higher occupancy increases exposure to minor incidents, customer anxiety, and the need for visible patrols and faster response capability.
- Customer service and occupancy management: when car parks are near full, the customer experience depends on active support, such as helping customers find available spaces, directing flows between facilities, and rapidly resolving barrier/payment issues to prevent exit queues.

4.3. Conclusion: Growth to [REDACTED] passengers requires disproportionate resourcing

In unconstrained growth conditions, additional passengers are partially absorbed through spare processing headroom and additional circulation space, and operating inputs can scale more smoothly. Dublin Airport’s current operating context is different. The airport is already operating at high utilisation with identifiable pinch points, most clearly at immigration, check-in and US TSA/CBP peaks, and through the structural constraints on gates/stands and kerbside space, and is required to maintain service quality during significant live construction and ongoing operational reconfiguration.

As passenger volumes grow toward [REDACTED], incremental demand will therefore be absorbed primarily through operational intervention, not spare infrastructure capacity. This drives a non-linear resourcing requirement: additional passengers increase not only transactional workload, but also the operational effort needed to manage congestion, maintain safe passenger flows, protect pier/gate crowding thresholds, prevent queue spillback into circulation, and sustain cleanliness and facilities availability at higher density.

Accordingly, the efficient operating cost allowance for Dublin Airport cannot be assessed against a steady-state or unconstrained benchmark. The relevant comparator is the operating model required to run a safe, resilient, and high-quality airport in capacity-constrained conditions, where the cost of maintaining performance is structurally higher and where the marginal passenger requires more active management than in normal growth environments.

5. Historic Performance and Efficiency

5.1. Dublin Airport Operating Costs 2023 – 2026

Operating costs at Dublin Airport reflect the prevailing inflation, passenger and revenue growth, investment in C3 security equipment plus the impact of changed passenger demographics (e.g. PRM costs).

	A2023	A2024	A2025	B2026
	€m	€m	€m	€m
Payroll Costs	194	204		
Nonpay Costs	162	176		
Total Operating Costs	356	380		
FTEs	2,723	2,870		

5.1.1. Payroll costs 2023 – 2026

The movement in average cost per FTE includes:

- 2023 pay inflation of 3.5%
- 2024 to 2026 pay agreement with staff with headline increases of 4% in 2024, 3% in 2025 and 3% in 2026, plus increases of 10% in both 2024 and 2025 to the entry rates of pay in front line roles (Security, Operations and Retail) in response to the flagged increase in minimum wage.
- Pay progression for front-line staff as per agreed contracts.
- A dilution in average cost per employee due to a) the increased proportion of front-line staff following the required increase in security staffing for C3 equipment and b) the high turnover of staff experienced in front line areas.

5.1.2. FTEs 2023 – 2026

The FTE increase of 479 is predominantly related to the operational areas across security, facilities, cleaning, policing & maintenance with further investment to support revenue growth and meet ESG commitments.

Security

Security staffing increased by 230 FTEs over the period to 2026, driven by a combination of technology change, operational factors, passenger growth and new regulatory requirements.

C3 security equipment and lane staffing model

The introduction of C3 security screening technology fundamentally changed the lane operating model and materially increased staffing requirements. Under the legacy model, staffing averaged 12 FTEs per lane in Terminal 1 and 8 FTEs per lane in Terminal 2; however, the C3 configuration requires 18 FTEs for a short lane and 23 FTEs for a long lane. This increase reflects the additional roles required to support image analysis, passenger flow management and compliance with enhanced screening procedures associated with the new technology, representing a structural rather than discretionary uplift in staffing.

Throughputs, staff tenure and decision times

Security throughputs have declined in Terminal 1, reducing from approximately 420 passengers per hour in 2019 to around 360 passengers per hour in 2025, while throughput assumptions in Terminal 2 have remained consistent with 2019 levels, with the introduction of ATRS balancing out the increased decision times. The reduction in throughput reflects a combination of structural and workforce-related factors rather than inefficiency. Average staff tenure has fallen materially, with approximately 85% of staff having more than 1.5 years' experience in 2019 compared with around 65% in 2025, reducing familiarity with new screening technologies and processes. In addition, decision times have increased significantly due to the complexity of interpreting 3D images generated by C3 equipment, with average decision times rising from approximately 6.5 seconds to 16 seconds.

Passenger growth and seasonal operating profile

Passenger volumes increased from 32 million to [REDACTED] over the period, representing growth of approximately [REDACTED] placing additional demand on security operations across the year. The absence of a passenger cap during the winter season has required Dublin Airport to maintain a higher base level of trained security officers for a longer portion of the year, rather than flexing staffing only around peak summer periods. This has increased baseline staffing requirements in order to ensure resilience, continuity of service and compliance during shoulder and off-peak months.

Regulatory requirement for divestment of hoodies and boots

The regulatory requirement for passengers to divest hoodies and boots introduced an additional processing step at security lanes, necessitating the introduction of a dedicated host role per lane pair. This role is required to ensure passenger compliance, manage divestment efficiently and prevent bottlenecks at the screening point. The introduction of hosts has increased total FTE requirements and reflects a mandated change to security processes rather than an operational choice by the airport.

Security trainers

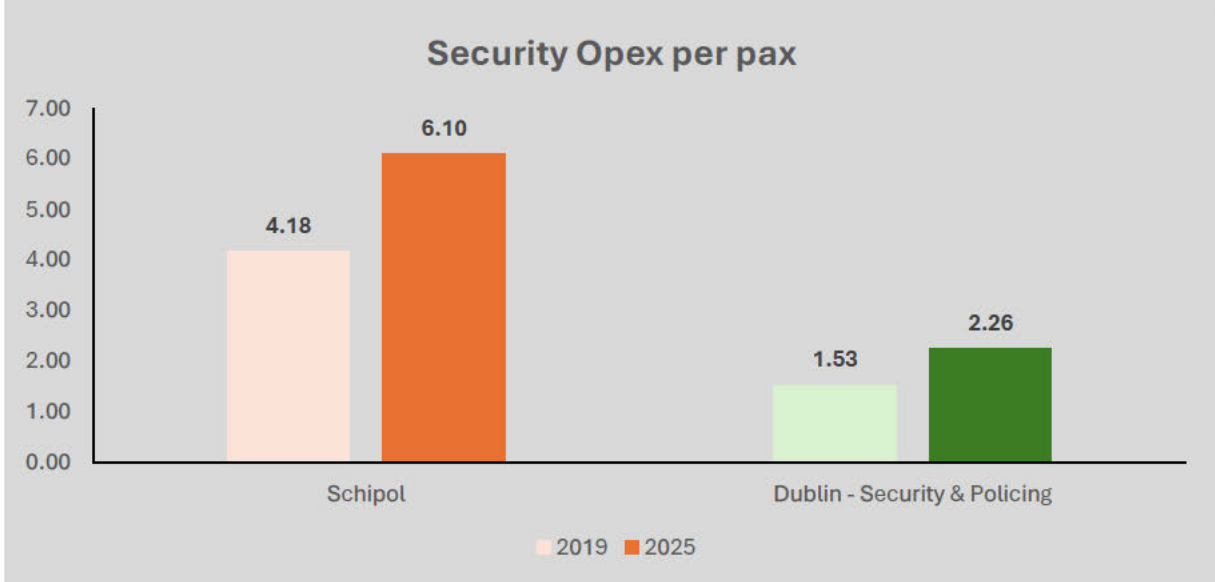
Security trainer capacity increased by 8 FTEs over the period to ensure that training provision remained aligned with both the significant growth in frontline security staffing and the increasing complexity of training requirements. The expansion of the security workforce, alongside the introduction of new screening technologies, revised operating models and additional regulatory requirements, has materially increased the volume, frequency and sophistication of initial and recurrent training. Additional trainer resources are required to support onboarding of new recruits, maintain competency standards, deliver certification and refresher programmes, and ensure consistent operational performance across all security functions. This increase in trainer

capacity reflects a necessary and proportionate response to structural changes in the security operation, supporting compliance, resilience and sustained service quality.

Security Opex - Dublin Airport Vs Schiphol

Publicly available information on disaggregated airport operating costs is limited. One of the few comparable disclosures is provided by Schiphol Group, which publishes disaggregated operating expenditure for the Security function within its Aviation business segment at Schiphol Airport, Amsterdam.

A comparison of this cost with Dublin Airport’s Security and Policing operating expenditure on a per-passenger basis demonstrates that Dublin Airport operates at a materially lower opex per passenger. Notwithstanding this, the analysis also shows that both airports have experienced a broadly similar increase in security-related operating expenditure since 2019, reflecting common regulatory and operating pressures: 48% at Dublin Airport compared with 46% at Schiphol.



Operations & Maintenance

Operational staffing across Campus Services, Airside Operations, Facilities & Cleaning, Car Parks and Maintenance increased by a total of 135 FTEs over the period, reflecting a combination of delayed workforce ramp-up post COVID-19, service quality improvements and passenger growth.

A significant portion of the increase (71 FTEs) relates to the more gradual than planned completion of planned resourcing, as recruitment was impacted by slower hiring timelines and elevated attrition, resulting in staffing levels only reaching steady-state progressively over 2023 rather than immediately. An additional 9 FTEs relate specifically to baggage operations, reflecting increased operational demands in this area.

Further staffing increases were targeted at improving service standards and addressing passenger feedback, particularly in areas directly influencing the passenger experience and SQM

performance. This included additional resources for summer season trolley management and outdoor cleaning (23 FTEs in total), and increased staffing at taxi ranks and for wayfinding (10 FTEs), all introduced to address identified service gaps and improve operational outcomes. The remaining increase in FTEs reflects underlying passenger growth through the period, which placed additional demand on frontline operational services and required higher staffing levels to maintain safe, efficient and reliable airport operations.

Revenue

FTEs have grown by 76 FTEs across commercial and retail business units.

- Retail FTEs have increased by 60 FTEs (19%) in response to the 28% increase in sales revenue. Sales per FTE has increased by 8% in the period.
- Commercial management FTEs have increased by 12, driving an increase in commercial revenue of €47m (21%), or +8% per pax.
- Platinum Services FTEs have increased by 4 FTE (12%) to cater for a 33% increase in revenues.

Digital

Dublin Airport has made an investment of 18 FTEs in its Digital team with an aim of increasing penetration of the B2C commercial products such as car parking, lounges and fast track, and also aimed at reducing the direct marketing and in-path costs of selling these products. See section below that reviews the net pay and non-pay cost saving related to the digital investment.

ESG

Dublin Airport has increased its FTEs by 28 related to ESG commitments.

- 9 FTEs directly relate to the increased management and reporting of noise related obligations for the Airport. These FTEs appear in the “Maintenance Staff” category.
- 18 FTEs relate to the increase in Graduate and Interns or apprentices taken on by Dublin Airport. This commitment was made in daa’s ESG strategy and is being implemented in 2026.





Other areas

Other area with smaller movements in FTEs are:

- Cyber – an increase of 5 FTEs in response to the increased importance of cyber security at all airports.
- Dublin Airport has insourced recruitment in order to improve control over the quality of applicants that are brought to interview and hired. This is to increase the speed of recruitment and reduced the level of attrition both during training/qualification and once

in the operation. A compensating non-payroll saving of €1.5m has been made on recruitment fees.

- The non-capitalised element of Capital Projects FTEs has increase by 4 FTEs, reflecting the increased capital spend since 2023.

5.1.3. Non-pay costs 2023 – 2026

Non-pay costs have increased by [REDACTED] between 2023 and 2026. The cost increases mainly relate to business growth, with other increases driven by inflation, imposed costs from Dublin Airports regulators, an improvement in airport standards and critical asset response times, aging infrastructure and accounting changes.

Business growth



Regulatory & statutory imposed costs

Costs from daa’s regulators (across IAA, AirNav, ANCA) increased the cost base by [REDACTED] between 2023 and 2026. These costs are included in the pass-through mechanism within the price cap and Dublin Airport requests that they continue to do so.

Airport Standards and Critical Assets

In response to ASQ scores, customer feedback and some critical asset failures in 2024, Dublin Airport has invested [REDACTED] in:

- Car park security [REDACTED]
- Improved cleaning [REDACTED]
- [REDACTED] on faster response times across critical assets within passenger screening, hold baggage screening, medium voltage support, airfield lighting controls.

Accounting treatment change

Dublin Airport has changed the accounting treatment of Microsoft licences from Capex to Opex. This has increased the IT & Technology costs by [REDACTED] with a partial year impact in 2025 and full year impact in 2026.

Maintenance costs

Outside of direct new assets and increased service levels, the aging infrastructure at Dublin Airport and general cost increases on newly tendered contracts has resulted in cost increases of [REDACTED]

The asset base at Dublin Airport has grown considerably in recent years, as have the number of assets >15 years. There has been a 17% increase in the total number of assets between December 2022 and December 2025, but a 150% increase in the number of assets > 15 years. The proportion of assets > 15 years has increased from 12% in 2022 to 26% in 2025. This aging of assets contributes materially to opex costs as they remain in use and critical to the operation, but required more frequent preventative and reactionary interventions.

While CPI for the period 2023 to 2026 has been 6%, prices have increased by 24% since 2019. As maintenance contracts run for multiple years, some contracts have had to pick up on pre 2023 inflation. Construction inflation, which has a closer relationship to maintenance costs, has run at 10% in the 2023 to 2026 period.

IT & Technology costs

IT costs in total have increased by [REDACTED] related to revenues, new assets, digital and the changed accounting policy described above. [REDACTED]

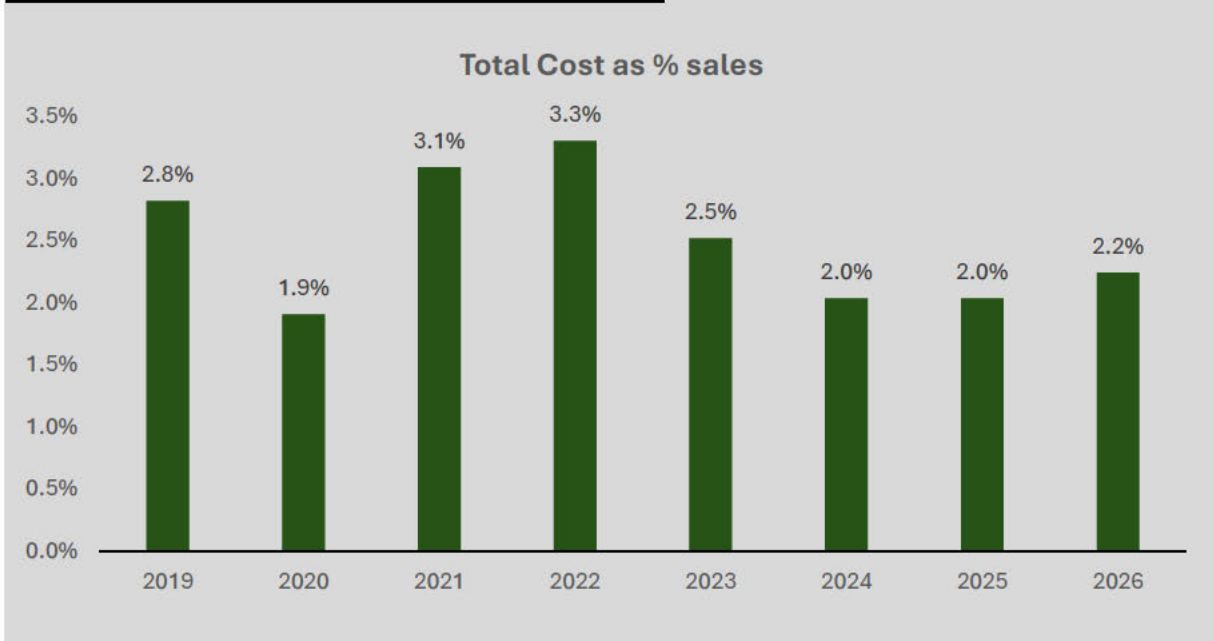
Growth in IT results from hardware, storage & device expansion across key airport services such as CCTV, new C3 cabin baggage screening devices, ACDM/IAOP initiatives and data growth. Dublin Airport's IT growth numbers include:

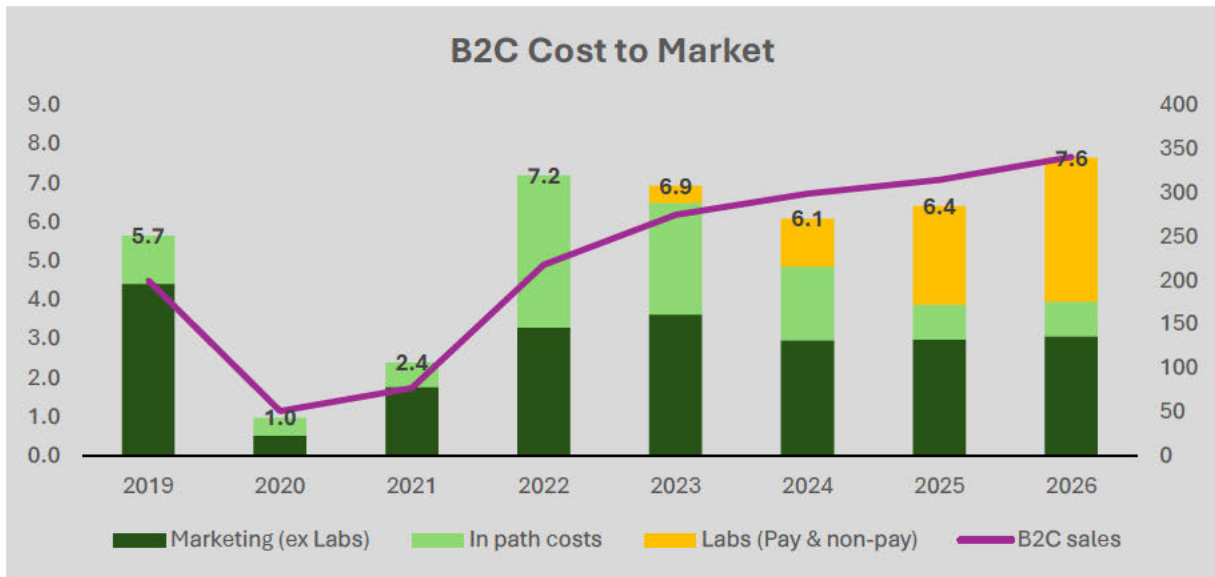
- Dublin airport's infrastructure footprint saw significant growth over this period with an increase in virtual servers from 750 to 1,150
- Storage growth from 1.7PB to 4.9PB (Influenced by Baggage & C3 ATRS)
- User and mailbox growth from 3800 to 4440
- Significant network expansion and CCTV camera growth from 1,200 to 1,700.
- Cyber Security Spend Services Increased
- D&A Services moved to Cloud to utilise Native cloud tools
- Database growth on average of 7% Year on Year.

Cybersecurity

Dublin Airport continues to invest significantly in cyber security to ensure we protect key assets and data from compromise and ensure the integrity of critical business services. Key callouts are that:

other services), which aligns with the Group’s strategic emphasis to “really embrace AI innovation and efficiency” as a core lever of performance and growth. This digital focus also extends into retail and e-commerce capability (including duty-free e-commerce and a “one-basket” purchasing concept), alongside loyalty programmes and product bundling designed to improve conversion and spend per passenger. The approach is being actively developed through structured exploration of future digital opportunities, demonstrating an intentional pipeline from ideas to revenue delivery rather than ad-hoc initiatives. Framed as an investment case, the return on investment is achieved across both a lower “cost to market” (through reusable digital channels, targeted campaigns and measurable conversion funnels that reduce reliance on higher-cost marketing and in-path routes) and increased sales (by expanding the proportion of passengers purchasing digitally and improving conversion through e-commerce, loyalty and bundled propositions).



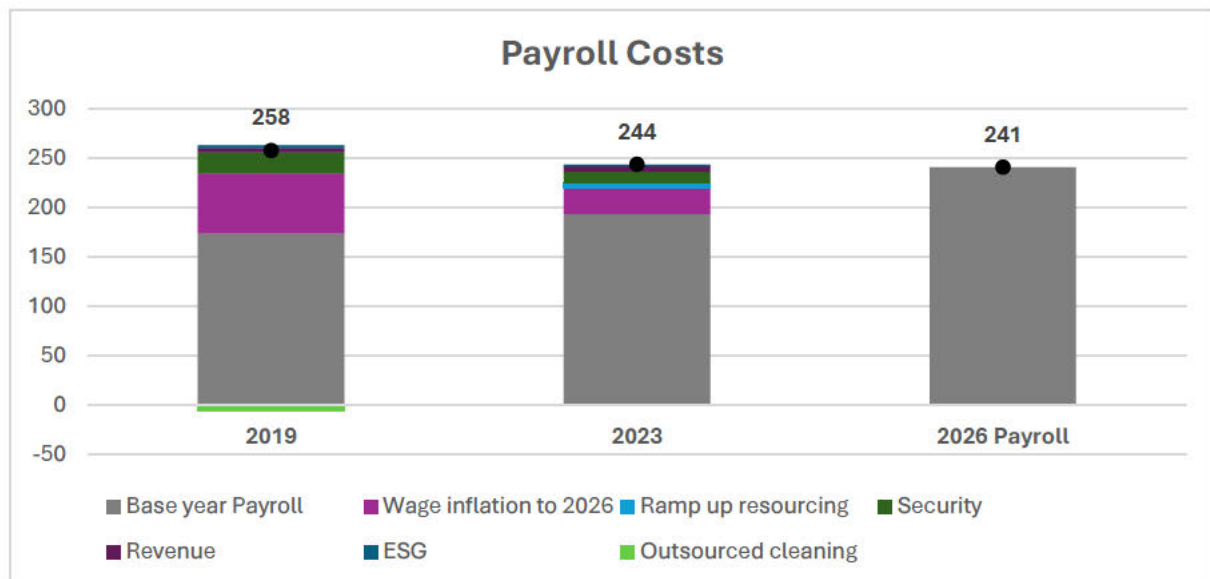


5.1.4. Opex efficiency

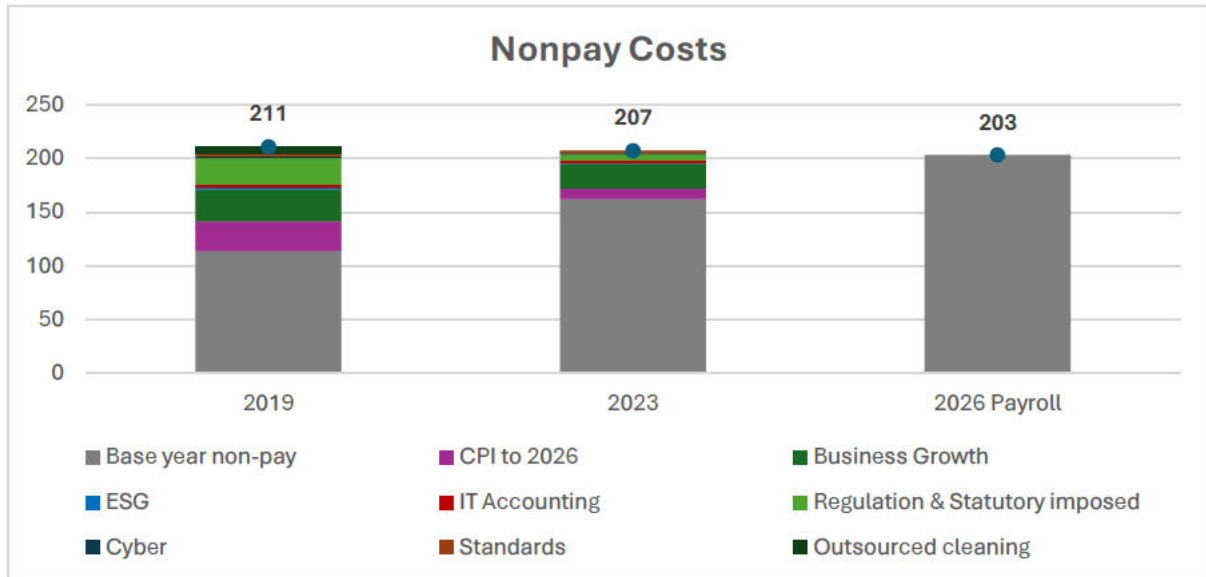
Opex Development Relative to Prevailing Inflation

The evolution of Dublin Airport’s operating cost base is consistent with prevailing inflationary pressures across wages and general consumer prices, while also reflecting the minimum level of operational investment required to safely and efficiently operate the airport.

When the payroll cost base from 2019 and 2023 is uprated for observed inflation and adjusted for necessary investments in security, revenue generation, ESG obligations and the completion of post-COVID workforce ramp-up, the resulting cost trajectory demonstrates that underlying costs have moved broadly in line with expectations. Importantly, this analysis indicates that Dublin Airport has delivered a material efficiency improvement relative to the 2019 cost base, notwithstanding a materially more complex and regulated operating environment.



A similar assessment of non-pay operating costs shows a consistent pattern, with cost movements largely explained by inflation, asset base growth and unavoidable regulatory and service-driven requirements rather than underlying inefficiency. Once these factors are taken into account, non-pay costs have evolved broadly in line with expected trends, supporting the conclusion that Dublin Airport’s OPEX growth reflects disciplined cost control and efficient operation within the context of sustained inflationary pressure and higher service expectations.



2026 Outturn Budget Performance Relative to the Dublin Airport 2022 Forecast

Dublin Airport’s 2026 budget demonstrates disciplined cost management and operational efficiency when compared with the forecast submitted as part of the 2022 Determination, despite a more demanding operating environment and higher expectations for service quality and passenger satisfaction. Payroll costs are lower than originally forecast, reflecting cost inflation outcomes below 2022 assumptions and higher attrition rates which reduced the average cost of employment.

Total staffing levels are higher than forecast by 89 FTEs, driven by targeted increases in security (+22 FTEs), graduates and interns (+38 FTEs), digital capability (+18 FTEs) and other operational roles (+12 FTEs). These increases reflect deliberate investment in capability, resilience and future workforce sustainability, and have been absorbed without exceeding forecast payroll costs.



³ Comparison to Dublin Airport and IAA forecast treats pass through opex as like for like

Budget 2026 Performance Relative to the IAA Forecast

Dublin Airport's Budget 2026 OPEX exceeds the IAA forecast primarily due to targeted investments required to maintain safe, compliant operations and meet rising passenger satisfaction expectations. The payroll variance of [REDACTED] concentrated in frontline and capability-critical areas. Security staffing accounts for the largest component of this variance ([REDACTED]), reflecting structural changes in screening operations and regulatory requirements that are not fully captured in the IAA's top-down modelling approach. Facilities and cleaning staffing increased by [REDACTED] to support higher service standards across terminals and landside areas, while additional investment in graduates and interns [REDACTED] and digital capability [REDACTED] reflects a deliberate strategy to strengthen operational resilience, succession planning and productivity over the medium term. These increases are partially offset by lower retail staffing [REDACTED] and tight control across other staff categories.

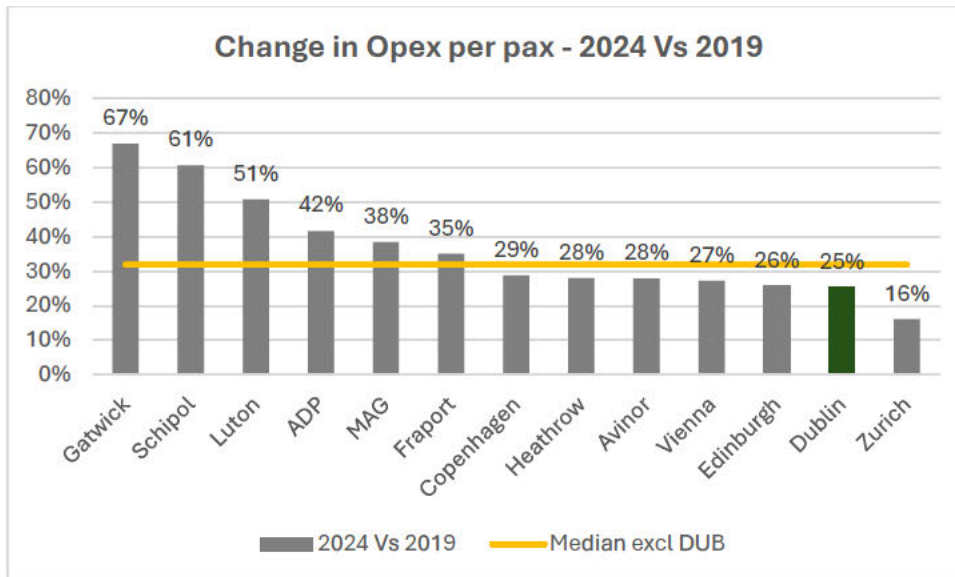
Non-payroll costs in Budget 2026 are [REDACTED] higher than the IAA forecast and are similarly concentrated in areas directly linked to revenue generation, operational delivery, asset resilience and passenger service. Increased spend on revenue-generating activities [REDACTED] reflects costs that scale directly with commercial performance. Cleaning contract costs [REDACTED] and PRM services [REDACTED] reflect the tendered, third party cost for these services, while investment in new assets and critical asset resilience [REDACTED] addresses known operational risks and supports reduced response times and system reliability. These increases are partially mitigated by marketing cost savings (which offset digital investment), with no material variance across other non-pay categories.

5.2. Trends in Opex per passenger

Dublin Airport's opex per passenger has been on an increasing trajectory since 2019, due to the high inflationary environment and the factors discussed in the section above.

Opex per pax has increased by 25% between 2019 and 2024, but reduced by -3.4% since 2022 as the operational difficulties seen in that year have been corrected.

This trend of increased opex per pax is replicated across European airports. The graph below shows the median increase in opex per pax of 32% from 2019 to 2024 (average of 37%), while Dublin Airport's opex per pax has increased by 25%. Only Zurich, where CPI for the period was 6% (Ireland: 19.5%) shows a lower increase in opex per pax.



Source: daa analysis of Annual Reports & Investor Presentations; all % change calculations are made in local currency

5.3. Customer centric efficiency

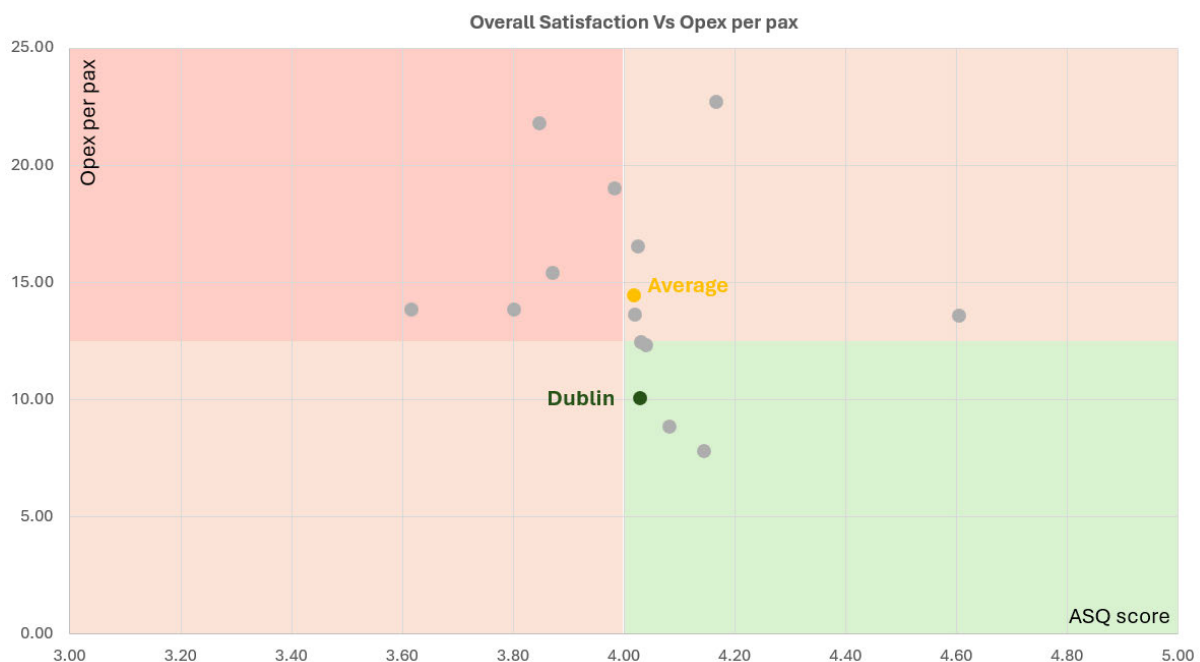
Customer centric efficiency at Dublin Airport over the period 2023 to 2026 is defined as the delivery of safe, resilient and high-quality airport services in a manner that is directly responsive to passenger needs, while ensuring that operating expenditure is targeted, proportionate and demonstrably value-adding. Efficiency in this context is not pursued as cost minimisation in isolation, but rather as the optimal use of resources to support punctuality, service continuity, regulatory compliance and a positive passenger experience across periods of both peak demand and operational disruption.

Following the unprecedented volatility experienced during and after the pandemic, the 2023 to 2026 period represents a transition from recovery to stabilisation and forward planning. Customer centric efficiency during this period therefore places particular emphasis on operational resilience: ensuring that staffing models, systems and processes are sufficiently robust to meet demand variability, enhanced security and safety requirements, and evolving passenger expectations, while avoiding the service failures and congestion costs that ultimately undermine both customer outcomes and economic efficiency. Investment decisions are assessed through the lens of their impact on end-to-end passenger journeys, with a focus on reducing friction at critical touchpoints such as security screening, airside operations and passenger assistance.

In practical terms, this approach means prioritising expenditure that improves service reliability, predictability and compliance, even where this entails higher baseline operating costs than a purely reactive or minimum compliance model. Customer centric efficiency recognises that under-investment can lead to disproportionate downstream costs, including delays, recovery expenditure, reputational damage and regulatory risk. Accordingly, Dublin Airport's operating model over 2023 to 2026 seeks to balance disciplined cost control with targeted investment in people, processes and technology that deliver sustained service improvements for passengers and airlines.

Ultimately, customer centric efficiency supports the broader regulatory objective of ensuring that Dublin Airport operates in the long-term interests of users. By aligning operating expenditure with clearly articulated service outcomes and passenger benefits, Dublin Airport aims to demonstrate that efficiency gains are achieved not through service erosion, but through smarter deployment of resources, continuous improvement and a clear focus on what matters most to customers using the airport.

The success of this model can be observed in the overlay of opex per passenger and service quality scores for Dublin and peer airports. The graph below shows Dublin Airport outperforming the majority of peer airports when both opex per passenger and service quality are taken into account.



Source: Dublin Airport analysis, adjusting for major like for like difference in retail and ground handling operations. Peer airports include Heathrow, Zurich, Charles de Gaul, Frankfurt, Rome, Vienna, Schiphol, Gatwick, Copenhagen, Madrid, Oslo and Luton.

5.4. Dublin Airport Staff Costs

Staff costs at Dublin Airport have increased since 2019 in order to remain competitive with the local market, in particular at a time when the airport and local economy has been growing rapidly.

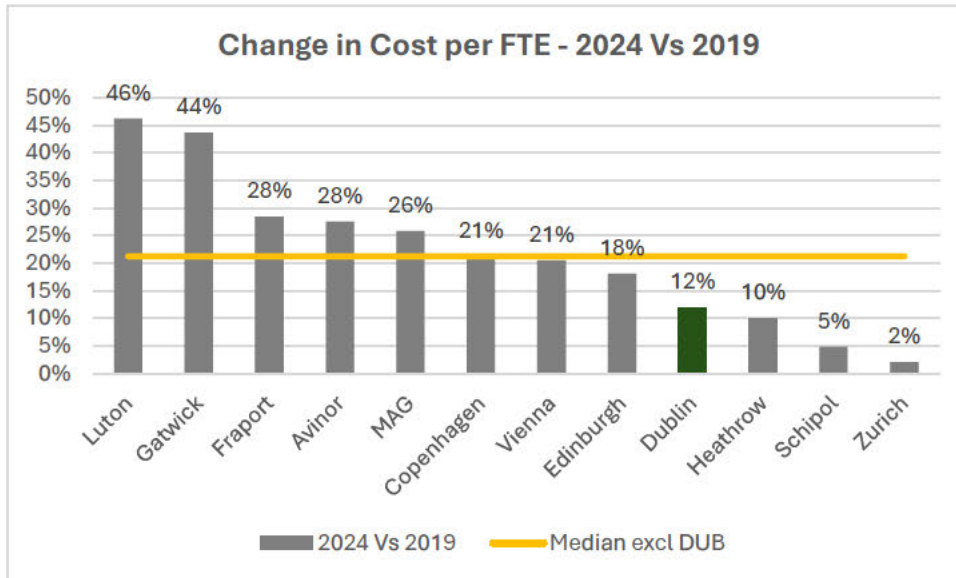
The increase in staff costs at the airport have been influenced by:

- National wage inflation of 25% to 2024, forecast to increase to 29.7% to 2025 and 34.8% to 2026
- Irish National Minimum Wage has increased by 38% between 2019 and 2025, 44% between 2019 and 2026 and 35% between 2022 and 2026.
- Competing employers, Lidl & Aldi, increasing their wages by 17% & 18% since 2022

5.4.1. Cost per FTE benchmarking

As stated above, Dublin Airport’s average cost of employment in 2026 will have increased [REDACTED]

Dublin Airport’s increase in cost per FTE is the fourth lowest of peer airports and almost half of the median increase of 21%.



Source: daa analysis of Annual Reports & Investor Presentations; all calculations are made in local currency

When benchmarked to the peer group, Dublin Airport’s average cost of employment is the third lowest of the peer group, 9% below the median and in line with most of the peer group.

Employment costs at Dublin Airport includes wages & salaries, overtime, social security tax (PRSI), pension costs and smaller costs for payment protection insurance.

5.4.2. Wages and Salaries

Wages and salaries for non-front-line staff are benchmarked with similar roles through Towers Watson.

For front line roles, Dublin Airport increasingly has to compete against local employers for talent. Two relevant employers with which Dublin Airport competes, and who publish their wage rates are LIDL and ALDI. Both are material employers in the Dublin Airport catchment area, and while the roles at Dublin Airport require a higher degree of skill and training, a combination of the higher proportion of unsocial hours and the overall tightening of the labour market has resulted in competition between Dublin Airport and these employers for key staff.

Both LIDL and ALDI both offer €15.10 per hour on joining, with ALDI increasing this to €15.70 for Dublin based stores. Both then progress to paying €17.40 per hour. LIDL offers €15.40 per hour for Warehouse Operatives, with the same pay structures (progression, premium pay etc.) as retail

staff. ALDI's website does not disclose its shift allowances but LIDL's website is clear that it also offers:

- 25% additional pay for any unsocial hours worked (12am to 7am)
- 50% supplement for any hours worked over 39 hours
- 50% supplement working on a Sunday
- 75% supplement working unsocial hours in conjunction with working over 39 hours or on a Sunday
- 100% supplement working on a bank holiday
- Company pension

LIDL Warehouse Operative & Dublin Airport Operations staff

Taking LIDLs Warehouse Operative rate of €15.40 (and noting it as the midpoint of LIDL retail operative ALDI's Dublin rate) and mapping it over the average roster of a Dublin Airport staff (normal hours 56%, unsocial hours 30%, Sunday 14%) gives an average rate of €17.65. This is in line with the Dublin Airport rate of €17.76 (noting also that the Dublin airport rate applies to bank holidays, whereas LIDL pays €30.80 per hour on bank holidays).

LIDL's rate progresses with experience from €15.40 to €17.90, an increase of 16%. Dublin Airports rate progresses from €17.76 to €20.45, an increase of 15%.

Dublin Airport has also reviewed the current vacancy postings at UK airports. As of January 2026, only Manchester Airport are actively seeking security staff for which they are offering:

- £15.43 per hour (this equates to €17.81 per hour, with the 8% differential to Dublin Airport being more than accounted for by the 18%⁴ to 26%⁵ cost of living differential between Dublin and Manchester)
 - Manchester note that the hourly rate is inclusive of 22.5% shift allowance
- Pension plan with company contribution options up to 10%
- 24 days holiday plus bank holidays

5.4.3. Skills and training

Dublin Airport roles require different levels of training prior to starting on the floor. All roles undergo corporate induction and require Basic Safety and Awareness training.

5.4.3.1. Security training

Security team members perform a skilled, regulated role and are required to demonstrate competence through a structured programme of training, assessment, and external certification before operating independently. All new joiners complete a mandatory six-week training pathway, with progression strictly contingent on achieving defined performance thresholds at each stage.

⁴ [Cost of Living Comparison Between Dublin, Ireland And Manchester, United Kingdom](#)

⁵ [Dublin vs Manchester comparison: Cost of Living & Salary](#)

The programme begins with two weeks of formal knowledge transfer training, during which new joiners are instructed in regulatory requirements, operational procedures, and core security principles. Competence is assessed at the end of this phase, with a minimum pass rate of 85 per cent required. A maximum of two assessment attempts is permitted, reinforcing the expectation that individuals can assimilate and retain critical knowledge.

In week three, new joiners undertake computer-based image interpretation training, a core operational competency for aviation security screening. This phase focuses on developing the ability to accurately identify prohibited items and anomalies. As with earlier stages, a minimum pass rate of 85 per cent applies, with no more than two attempts allowed.

Week four transitions training into the live operational environment through structured on-the-job training. New joiners operate under supervision while undergoing formal competency assessments. Successful completion requires achieving an assessment score of at least 85 per cent, ensuring that theoretical knowledge is consistently and correctly applied in practice.

Week five represents the critical regulatory gateway within the training programme and is the point at which new joiners are formally assessed against externally mandated standards. All security team members are required to obtain Irish Aviation Authority (IAA) certification prior to any independent operational deployment. This certification is a regulatory requirement and is not discretionary.

IAA certification comprises seven separate examinations per individual, reflecting the breadth of knowledge and practical understanding required to perform the role effectively and compliantly. The examinations cover both theoretical and applied elements of aviation security screening and are designed to test the individual's ability to understand, interpret, and apply regulatory and operational requirements.

The certification examinations span the following areas: theory, access control, X-ray, explosive trace detection (ETD), security search cabin (SSC), person search, and bag search. Each examination must be passed independently, with a minimum required score of 80 per cent per exam. This structure ensures that competence is demonstrated across all key functional areas rather than through an aggregate or averaged outcome.

The requirement to pass seven distinct examinations in a single certification phase underscores the skilled nature of the role and the level of individual accountability involved. New joiners must demonstrate not only knowledge retention but also the ability to consistently meet regulatory standards across multiple security disciplines within a defined timeframe.

Failure to achieve IAA certification results in non-progression and prevents the individual from undertaking unsupervised security duties. This control ensures that only those who have met the full regulatory standard are authorised to operate independently, maintaining compliance and safeguarding operational integrity.

Following certification, week six provides a hypercare period during which newly qualified officers operate with enhanced oversight. This phase is designed to consolidate learning, reinforce consistency, and ensure sustained compliance with both regulatory and operational standards.

The duration of training, the multiple assessment gateways, and the requirement for externally mandated IAA certification collectively demonstrate that the security officer position is a skilled

role. Independent operation is permitted only once competence has been evidenced through examination performance, practical assessment, and regulatory approval.

5.4.3.2. Operations training

The training programme for new joiners into the Operations Teams at Dublin Airport is comprehensive and reflects the safety-critical, customer-facing and operationally diverse nature of airport activities. All new employees complete a core induction suite covering corporate induction, fire safety, aviation security, apron safety, driving and access requirements, dignity and respect, and regulatory compliance. This foundation ensures that staff understand both daa’s operating environment and their individual responsibilities from the outset, regardless of role.

Beyond induction, a set of generic operational modules applies across multiple functions. These include conflict management and customer service, radio communications, manual handling, disability awareness, and basic cleaning and chemical safety. These modules are designed to support consistent service delivery, safe working practices and effective interaction with passengers, particularly those with reduced mobility or additional needs.

Role-specific training then builds on this core through specialised programmes tailored to cleaning operations, landside and terminal delivery, trolley services and winter operations. This includes extensive hands-on training on cleaning machinery, airside and terminal environments, traffic and forecourt management, queue and barrier layouts, and seasonal winter equipment such as gritters, ploughs and snow-clearing assets. The breadth of this training reflects the operational complexity of Dublin Airport and ensures that new joiners are fully competent, compliant and deployment-ready before undertaking duties in live operational environments.

The table below sets out the time taken to complete the required training modules for different roles within the Dublin Airport operations team.

Landside and Terminals Roles Training Courses Duration

Role:	Course Duration (hours):
Airport Cleaning Team Member	53.17
Landside Cleaning Driving Team Member	68.67
Landside Airport Delivery Team Member	51.67
Landside Airport Delivery Team Member (Trolley Driver)	68.17
Terminals Airport Delivery Team Member	42.67

The breadth and depth of mandatory training required for new joiners clearly demonstrates that these roles cannot be characterised as entry-level or minimum-skill positions. Staff are required to complete extensive induction, regulatory, safety, security, customer service and role-specific operational training before they are deemed competent to operate independently. This includes aviation security compliance, airside and landside safety, specialist equipment operation, disability awareness, conflict management and seasonal resilience activities such as winter operations. The scale, technical content and regulatory significance of this training reflects the complexity, responsibility and accountability inherent in these roles, and underscores that they require a skilled, well-trained workforce capable of operating safely and effectively in a highly regulated airport environment.

5.4.3.3. Retail roles

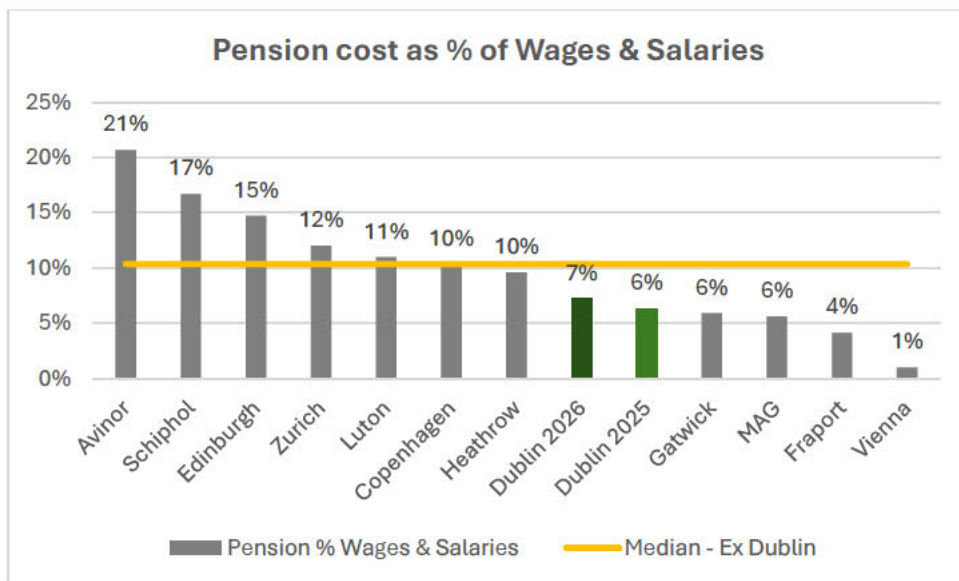
The training and onboarding model for retail staff at Dublin Airport is structured and extensive. All new hires complete a full six-day induction programme delivered entirely off the shopfloor, covering mandatory compliance, customer service standards, operational procedures and airport-specific requirements. Only after completing this structured classroom training do employees transition to the retail environment, where they undergo a further 28-day period of supervised, on-the-job development through buddying and shadowing experienced sales professionals. This phased approach reflects the complexity of the operating environment, the high standards expected in a premium international airport retail setting, and the level of skill, judgement and customer engagement required to perform these roles effectively and independently.

5.4.4. Pension costs

daa’s pension offering was agreed with staff and unions in 2015, and offers company contribution up to 10%, depending on the employee contribution levels.

Up to December 2025, circa 300 staff have not participated in the scheme but will be automatically enrolled from 2026. This will increase the Dublin Airport pension cost by [REDACTED]

The table below shows that Dublin Airport’s pension scheme aligns with peer European airports. This tallies with MAG’s offer of up to 10% and Heathrow’s offer of up to 12%⁶.



Source: daa analysis of 2024 Annual Reports & Investor Presentations; all calculations are made in local currency

⁶ [Benefits - Heathrow](#)

6. Dublin Airport Efficiency Position

Dublin Airport's operating performance demonstrates that the airport is an efficient operator, with cost outcomes that are proportionate to external inflationary pressures, structural regulatory change and rising service expectations, rather than reflective of underlying inefficiency. When assessed across multiple dimensions, including cost trends, peer benchmarking, service-quality outcomes and outturn performance relative to regulatory forecasts, the evidence consistently indicates disciplined cost control and effective deployment of resources.

6.1. Cost Trends Since 2019 and 2023

Since 2019, Dublin Airport has operated in a period characterised by unusually high inflation, significant regulatory change, and materially increased operational complexity. Wage inflation nationally has exceeded 30% since 2019, with statutory minimum wage increases of over 40% over the same period, while CPI has increased by more than 20%. Against this backdrop, [REDACTED]

[REDACTED] materially below national wage inflation over both horizons. This indicates that the airport has absorbed a significant portion of external cost pressure through workforce composition, attrition effects and productivity improvements rather than passing costs through to the overall cost base.

A similar pattern is observed in non-pay expenditure. Once inflation, asset-base growth, new regulatory obligations and service-quality investments are taken into account, non-pay costs have evolved broadly in line with expected trends. There is no evidence of cost escalation beyond what is required to maintain a safe, compliant and resilient operation in a constrained infrastructure environment. In real terms, this points to an underlying efficiency improvement relative to the 2019 baseline, notwithstanding a materially more demanding operating context.

6.2. Peer Opex Benchmarking

Benchmarking against peer European airports further supports the conclusion that Dublin Airport operates efficiently. In absolute terms, Dublin Airport continues to exhibit one of the lowest operating cost bases per passenger among comparable large European hubs. While operating costs per passenger have increased across all airports since 2019, Dublin Airport's increase between 2019 and 2024 (approximately 25%) is materially below the peer median (32%) and well below the increases observed at many major European airports operating under similar regulatory and security regimes.

6.3. Service Quality and ASQ Performance

Efficiency at Dublin Airport is not achieved through service degradation. ASQ results show that passenger satisfaction has recovered to pre-COVID levels by 2024–2025, following targeted investment in security operations, cleanliness and passenger support. Cleanliness and overall satisfaction scores, which deteriorated sharply in 2022, have been restored to 2019 levels, demonstrating that expenditure has been effective in delivering tangible service outcomes.

When considered alongside peer airports, Dublin Airport delivers comparable or stronger service quality outcomes at a lower or mid-range cost base, reinforcing the conclusion that resources are

being deployed efficiently. The recovery of ASQ performance without a disproportionate increase in opex per passenger is a key indicator of customer-centric efficiency.

6.4. Outturn Performance Relative to the IAA Forecast

Finally, comparison of Dublin Airport's outturn and Budget 2026 position against the IAA forecast provides further evidence of efficiency. Where costs exceed the IAA forecast, the variances are concentrated in clearly identifiable areas, security, cleaning, PRM services and critical asset resilience. These investments have been targeted, proportionate and supported by observable improvements in operational stability and passenger outcomes.

At the same time, Dublin Airport has demonstrated restraint in areas where management discretion exists, delivering lower-than-expected average employment costs, savings in non-frontline functions, and cost offsets through digital investment and commercial efficiency. This pattern is consistent with an operator that actively manages efficiency rather than one that passively absorbs cost growth.

6.5. Conclusion on Dublin Airport Efficiency Position

Taken together, the evidence from cost trends, peer benchmarking, service-quality outcomes and regulatory comparisons demonstrates that Dublin Airport operates efficiently by European standards. Cost increases reflect unavoidable external pressures and necessary operational investment rather than inefficiency, while the airport's ability to restore service quality, control unit costs and outperform peer benchmarks underscores the effectiveness of its operating model. This provides a robust basis for recognising Dublin Airport as an efficient operator within the context of the forthcoming Determination.

6.6. Change required to the IAA/CEPA approach

The IAA/CEPA approach to assessing baseline efficiency appears to place disproportionate weight on an intensely granular, bottom-up review of the cost base. While bottom-up scrutiny can be a useful diagnostic tool, it risks creating false precision when it becomes the primary determinant of the allowed baseline. In practice, a line-by-line exercise requires a very large number of individual judgements around staffing, productivity, "efficient" unit rates, and operating practices. No organisation is ever 100% efficient, yet a methodology that implicitly assumes a fully optimised steady state at every micro-level can systematically understate what is required to operate safely, compliantly and reliably in the real world.

The key concern is not any single assumption, but the cumulative effect of many small, conservative calls. A granular review encourages decisions that, taken in isolation, may appear reasonable or "stringent but fair". However, when dozens of such decisions are combined, they can set a substantial efficiency challenge that is greater than the evidence would justify at an overall level. This compounding effect is particularly problematic where the airport is operating in a constrained environment with heightened service expectations, evolving regulatory obligations, and limited ability to flex infrastructure (conditions under which resilience and operational stability are not discretionary "nice-to-haves", but core requirements).

A more balanced and robust approach would place greater emphasis on top-down benchmarking as the anchor for baseline efficiency, with bottom-up review used as a targeted sense-check rather than the starting point. Benchmarking provides a more grounded, outcome-based view of

efficiency because it assesses what comparable operators actually achieve, rather than what an analyst can construct through a large set of modelling choices. Applied properly, benchmarking in absolute terms can compare opex per passenger across a carefully selected peer group, with transparent adjustments for material structural differences in operating model, such as the treatment of activities that may sit inside or outside the airport's reported cost base, and differences in commercial operating arrangements, so that like-for-like comparisons are genuinely meaningful.

Even more powerful than a single "snapshot" is benchmarking the evolution of unit costs over time. Comparing how opex per passenger develops year-on-year for Dublin Airport against the trajectories of individual peer airports provides a direct read on relative efficiency progress, capturing productivity improvements, technology change, service standards and operating model evolution. This longitudinal lens also mitigates the risk of anchoring conclusions on an atypical year or a temporary distortion, and it is better aligned with the practical reality that efficiency is a journey, continuous improvement over time, rather than an instantaneous state.

In short, a credible baseline assessment should be triangulated: benchmarked top-down at the aggregate level (and over time), cross-checked against internal performance and operational outcomes, and complemented by selective bottom-up deep dives only where there is clear evidence of potential inefficiency or where the operating model is undergoing genuine step-change. This rebalancing would reduce the risk of false precision, avoid compounding conservative micro-assumptions into an unrealistic baseline, and provide a more transparent and proportionate foundation for the 2027–2031 period.

7. Forecasting Approach

7.1. Baseline efficiency of the 2026 Cost Base

The forecasting approach for operating expenditure over the 2027–2031 regulatory period is anchored to the 2026 cost base, which represents a mature and efficiency-tested operating position for Dublin Airport. This baseline reflects a period in which significant cost reductions and organisational restructuring had already been delivered following the pandemic, alongside the operational scaling required to safely accommodate the recovery and subsequent growth in passenger volumes.

By 2026, Dublin Airport is operating at high levels of asset utilisation and workforce intensity, within a constrained and increasingly complex operating environment. The baseline incorporates the full operational effects of major changes already absorbed into the cost base, including the transition to C3 security screening, increased PRM demand, the re-establishment of staffing levels following COVID-related downsizing, and the management of congestion across terminal, airfield and landside systems. These changes involved material cost frictions during implementation, the impacts of which are embedded within the 2026 position.

Accordingly, the 2026 cost base should not be regarded as a theoretical steady-state benchmark from which further structural efficiencies can be readily extracted. Rather, it represents a stretched operating environment in which efficiency opportunities have already been substantially realised, and where further reductions in operating costs would risk undermining safety, resilience or service quality. This starting position is a critical consideration in the assessment of forecast efficiency over the regulatory period.

Future movements in operating expenditure over the 2027–2031 period are therefore driven primarily by unavoidable external factors, including passenger growth, congestion-related operational complexity, the increasing scale and age of the asset base, regulatory and security requirements, and labour market pressures. The forecasting approach is designed to transparently distinguish these drivers from underlying efficiency performance, ensuring that incremental cost changes are clearly linked to operational need rather than baseline inefficiency.

On this basis, the forecasting methodology set out in the following sections combines bottom-up operational modelling with top-down reasonableness checks to ensure that projected operating expenditure remains proportionate, justified and consistent with the delivery of safe, resilient and high-quality airport operations over the regulatory period.

7.2. Overview of Forecasting Principles

The operating expenditure forecast for the 2027–2031 regulatory period has been developed using an evidence based, bottom up approach, designed to ensure that all proposed costs are necessary, efficient, and proportionate to the level of activity and service standards required at Dublin Airport.

The forecasting approach is underpinned by four core principles.

7.2.1. Cost reflectivity

Opex forecasts reflect the underlying operational requirements of running a safe, secure, and resilient airport, with costs explicitly linked to identifiable activities, service standards, and asset requirements.

7.2.2. Transparency and traceability

Material cost categories are modelled from first principles, allowing a clear line of sight between:

- Operational assumptions (e.g. passenger volumes, service levels),
- Resource requirements (e.g. staff, contracts, asset maintenance),
- Resulting operating costs.

7.2.3. Responsiveness to key drivers

Where costs are materially influenced by changes in demand, labour markets, or regulatory requirements, these relationships are explicitly captured.

7.2.4. Consistency with shareholder and passenger expectations

The approach is aligned with the daa focus on efficient cost recovery, affordability for users, and the maintenance of appropriate service quality and operational resilience over the regulatory period.

The forecast distinguishes between:

- Structural costs, which are largely fixed in the short to medium term;
- Volume-driven costs, which vary with passenger throughput and activity levels; and
- Policy or compliance driven costs, arising from regulatory, safety, or sustainability obligations.
- Incremental capex driven costs

This structure ensures that cost growth is evidence-led rather than assumption-led, and that Dublin Airport is neither over-recovering nor under-providing for essential operational activities.

7.3. Bottom-Up Cost Modelling Approach

For the most material and operationally sensitive areas of expenditure, Dublin Airport has adopted bottom-up cost modelling to forecast Opex over the 2027–2031 period. These models are built from detailed operational inputs rather than high-level trend extrapolation, providing a robust basis for regulatory assessment.

Bottom-up modelling has been applied to cost categories that:

- Represent a significant proportion of total Opex;
- Are directly linked to passenger activity or service standards; and
- Are subject to regulatory oversight or contractual obligations.

The approach involves:

- Defining the operating model for each cost category;

- Identifying the key resource drivers (e.g. staff numbers, hours, asset base);
- Applying relevant cost rates (e.g. wage assumptions, contract pricing); and
- Aggregating outputs into annual Opex forecasts consistent with traffic projections.

7.3.1. Major Cost Categories Modelled Bottom-Up

Security

Security costs are modelled using a structured, demand-led approach that aligns operational resourcing with both regulatory requirements and expected passenger volumes. The model is anchored to the busy-day passenger profile and reflects mandated screening obligations, ensuring that resource planning is compliant with applicable aviation security standards. Passenger throughput assumptions are applied to determine required staffing levels, taking account of defined staffing ratios and established shift patterns. In addition, the model incorporates the impact of technology deployment and process changes on productivity, ensuring that efficiency gains are appropriately reflected. This approach ensures that security expenditure is proportionate, evidence-based, and responsive to anticipated passenger demand while maintaining full regulatory compliance.

Customer Service / Service Delivery

Customer service costs are modelled using a structured, demand-led methodology that is anchored to the final year of the forecast period and then worked backwards to the current year. This approach ensures that resourcing and cost assumptions are aligned with the level of service required to support forecast passenger demand over time.

The model is primarily driven by passenger volumes and terminal activity, with particular emphasis on busy-day passenger demand and passenger flow patterns. These demand assumptions are aligned to the busy-day stand plan, ensuring that customer service resources are matched to expected aircraft movements and terminal congestion points. Service level commitments, including the requirement to maintain resilience during peak periods, are incorporated to ensure that service quality is maintained under high-demand conditions. Staffing models are then applied to balance service delivery expectations with operational efficiency, ensuring that customer service costs are proportionate, justified, and reflective of both demand and service standards across the forecast period.

Cleaning

Cleaning costs are modelled using a structured approach that is anchored to the final year of the forecast period and then worked backwards to the current year. This ensures that cleaning resources and associated costs are aligned with the scale and intensity of activity required to support forecast passenger demand over time. As the airport becomes increasingly capacity-constrained, this framework also allows for targeted adjustments to address resourcing pinch points that emerge in high-density or operationally stressed areas.

The model is driven primarily by the terminal and facility footprint, with cleaning requirements defined by area type and required cleaning frequencies. These frequencies are adjusted to reflect differing levels of intensity across the estate, recognising that higher-use and passenger-facing areas require more frequent intervention. Passenger density, peak usage periods, and the

additional operational pressure created by constrained circulation space are explicitly factored into the model to ensure that cleaning provision remains adequate during periods of highest demand. Where cleaning services are outsourced, including contracted terminal footprints such as Terminal 1, the model reflects agreed contractual terms to ensure costs are consistent with existing service arrangements.

This approach ensures that cleaning expenditure is proportionate, demand-led, and reflective of both operational usage and contractual obligations across the forecast period, while also capturing the additional resource requirements created by localised pinch points in a highly constrained operating environment.

PRM (Passengers with Reduced Mobility)

The forecast for PRM costs is derived by projecting forward the observed propensity of PRM usage between 2019 and 2025, reflecting the sustained increase in the proportion of older passengers and the broader shift in passenger demographics. This historical trend is rolled out to 2031 to ensure that resourcing levels remain aligned with the expected long-term demand for assistance services.

The model incorporates the costs, terms and service standards of the new PRM contract tendered in 2025, which introduces updated service requirements, performance obligations and associated cost structures. As a result, the forecast reflects both the underlying demographic-driven increase in demand for PRM support and the operational and commercial implications of the new contractual framework, ensuring that PRM provisions remain adequately resourced, compliant, and capable of meeting passenger needs across the entire forecast horizon.

Maintenance non pay costs

Maintenance expenditure is derived from the scale and condition of the underlying asset base and the contractual arrangements in place for its upkeep. The modelling reflects established maintenance regimes and known lifecycle requirements, ensuring that assets are maintained in a safe, reliable, and compliant condition over time. The interaction between new capital assets and ongoing operating costs is explicitly considered, recognising that changes to the asset base can alter maintenance profiles and expenditure requirements.

Particular focus is applied to aging assets, with targeted consideration given to assets over 15 years old, where maintenance intensity and cost pressures are typically higher. This approach ensures that maintenance investment is efficient, proportionate, and aligned with asset condition, safety, and long-term operational resilience.

IT and Digital Contracts

IT and digital costs are forecast based on a structured assessment of existing contractual commitments and their associated renewal profiles, ensuring that baseline expenditure reflects current obligations. The forecast incorporates known scope changes arising from commercial, operational, and security requirements, recognising that evolving business needs drive changes in system capability, support, and cost. In addition, the model reflects the planned transition from legacy systems to more modern digital platforms, capturing the cost implications of system replacement, rationalisation, and modernisation over time. This approach ensures that IT and

digital expenditure is forward-looking, aligned with operational requirements, and reflective of the ongoing shift towards more resilient and efficient digital solutions.

Across all categories, bottom-up outputs are reconciled against historic outturns and subject to internal challenge to ensure that forecasts represent efficient, not aspirational, cost levels.

7.3.2. Cost Driver Elasticities

While bottom-up modelling provides a robust foundation for forecasting operating expenditure, not all costs scale in a linear manner with airport activity. To ensure that forecast Opex appropriately reflects changes in operational demand and cost pressures, Dublin Airport has applied cost driver elasticities where there is a demonstrable relationship between cost levels and underlying drivers.

The use of elasticities allows the forecast to move beyond simple trend extrapolation by explicitly recognising that:

- Some costs vary directly with passenger volumes or activity levels;
- Some costs change only once thresholds are reached; and
- Other costs are largely fixed in the short to medium term but may adjust over longer horizons.

Applying elasticities ensures that cost growth is proportionate, evidence-based, and responsive to changes in demand and the operating environment, while avoiding both over-recovery during periods of lower activity and under-provision during periods of growth.

Elasticities have been applied selectively and conservatively, focusing on cost categories where:

- There is a clear operational or contractual linkage to the cost driver;
- Historic data demonstrates a consistent relationship; and
- The driver is outside management’s direct short-term control (e.g. passenger volumes, labour market conditions).

This approach supports the good regulatory practice by:

- Linking allowed Opex more closely to actual service delivery requirements;
- Incentivising efficiency by distinguishing between fixed and variable cost elements; and
- Improving transparency around how changes in passenger demand and wage pressures affect operating costs over the regulatory period.

The table below sets out how elasticities have been applied to key cost drivers, including passenger volumes and revenues, and how these have been calibrated to reflect Dublin Airport’s operating model and historic experience.

Cost line	Driver	Elasticity	Cost type	Explanation
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Airfield operations	Passenger growth	1.0	Staff	Airfield operations staffing scales broadly in line with passenger volumes because movements, stand activity, towing, inspections and safety-critical oversight increase proportionately with traffic levels. Given the safety-critical nature of the function and limited scope for productivity gains at peak utilisation, additional passengers require a near-one-for-one increase in operational coverage, making an elasticity of 1.0 appropriate. In addition, 6 FTEs are added in each on 2030 and 2031 to allow for additional follow me escorts and FOD control.
ARI retail logistics FTEs	Direct retail sales growth	0.3	Staff	Retail logistics staffing rises with sales volumes, but operational efficiencies dampen the rate of increase.
Asset Management technicians & engineers	Passenger growth	0.4	Staff	Passenger volumes increase asset utilisation and maintenance activity, but staffing growth is moderated by preventative maintenance regimes and scale efficiencies.
Baggage Operative	Passenger growth	0.4	Staff	Baggage handling demand grows with passenger numbers, though productivity improvements constrain the rate of staff growth.
Baggage Team Lead	Passenger growth	0.4	Staff	Supervisory baggage staffing increases with passenger volumes, but efficiency, rostering and automation limit proportional growth.
Capital projects	Capex spend	0.2	Staff	Capital projects staffing is primarily driven by the scale and complexity of the capital programme rather than passenger throughput. While increased capex requires some additional client-side oversight, governance and assurance, these requirements grow at a significantly lower rate than total spend due to programme management leverage and the use of external delivery partners, justifying a low elasticity.
Car Parks Team Member	Car parking revenue growth	0.4	Staff	Operational car park staffing increases with customer volumes but benefits from scale efficiencies and automation.
Control Centre Staff	Passenger growth	0.1	Staff	Control centre staffing is predominantly fixed, reflecting the need to maintain continuous 24/7 operational oversight regardless of passenger volumes. Incremental passenger growth marginally increases monitoring intensity but does not require proportional increases in staffing, as existing systems, automation and shift structures absorb most additional demand.
In-house maintenance staff (pax driven)	Passenger growth	0.4	Staff	Maintenance demand increases with passenger usage due to higher asset wear, fault frequency and reactive maintenance requirements. However, a substantial portion of maintenance activity is preventative, time-based or compliance-driven rather than volume-driven, resulting in partial rather than full proportionality to passenger growth.
Police Service	Passenger growth	0.2	Staff	Police resourcing is largely fixed and driven by baseline security and public order requirements rather than marginal passenger volumes.
Retail Front Line Staff	Direct retail sales growth	1.0	Staff	Front-line retail staffing scales directly with transaction volumes and opening hours.
Support Staff – Procurement Team	Total non-pay cost	0.4	Staff	Procurement workload rises with non-pay spend, though contract management and governance functions are partly fixed.
Bank and Credit Card Charges	B2C Commercial Revenue	1.0	3rd party	Transaction fees are charged as a fixed percentage or per-transaction rate on customer payments. As a result, these costs scale directly with B2C revenue volumes, with no material fixed component, making a fully elastic assumption appropriate.
Commercial management staff – Platinum Services	Platinum services revenue	1.0	3rd party	Management and support costs for premium services scale directly with the level of service activity and revenue.
Corporate Trade Subscriptions	FTEs	1.0	3rd party	Trade and professional subscriptions are allocated on a per-role or per-user basis and therefore scale directly with the number of relevant staff. .
Digital marketing	Commercial revenue	1.0	3rd party	Digital marketing expenditure is directly aligned to commercial revenue objectives and campaign intensity.

Employee related overheads	Total staff	1.0	3rd party	Employee-related overheads such as pensions, insurance and HR services scale directly with total headcount.
Employee Related Overheads	FTEs	1.0	3rd Party	Employee-related overheads (e.g. occupational health, payroll services, insurance and statutory costs) are incurred on a per-employee basis and therefore increase proportionately with headcount.
Executive Lounge Direct Costs	Executive lounges revenue growth	1.0	3rd party	Lounge catering and service costs vary directly with passenger usage and associated revenues.
External waste disposal	Passenger growth	0.4	3rd party	Waste volumes increase with passenger throughput, but contractual baseloads and fixed collection frequencies mean costs rise less than proportionately.
IT contracts (staff related)	Total staff	0.5	3rd party	IT support and licensing costs increase with staff numbers, but benefit from shared infrastructure and fixed contract elements.
Local Authority Rates Recover	Concession income growth	1.0	3rd party	Rates recoveries move proportionately with concession income in line with the underlying contractual recovery.
Logistics Costs	Retail sales growth	1.0	3rd party	Retail logistics costs vary directly with sales volumes through stock handling, distribution and warehousing activity.
Maintenance	Increase in # assets > 15 years	0.1	3rd party	Older assets marginally increase reactive maintenance requirements, but year-on-year cost sensitivity remains low relative to the overall estate.
Other marketing	Commercial revenue	1.0	3rd party	Broader marketing spend scales proportionately with targeted commercial revenue growth.
Security Regulatory Charge	Passenger growth	1.0	3rd party	The security regulatory charge is a statutory, exogenous levy that scales directly on a per-passenger basis.
Telephone Print & Stationery	FTEs	1.0	3rd party	These costs are directly linked to headcount, as each additional FTE requires access to communications, consumables and basic office supplies.
Travel & Subsistence	FTEs	1.0	3rd Party	Travel and subsistence costs are primarily role-based and linked to the size of the workforce. As staffing levels increase, these costs scale broadly in proportion, reflecting necessary training, inter-site travel and operational support requirements.
Valet Operating Expenses	Valet parking revenue and wage inflation	1.0	3rd party	Valet operating costs vary directly with service usage and staffing intensity.

7.4. Payroll inflation and wage growth assumptions

Payroll costs represent a material component of Dublin Airport’s operating expenditure and are a critical input to the Opex forecast for the 2027–2031 regulatory period. The approach to forecasting payroll inflation and wage growth has therefore been developed to be prudent, evidence-based, and reflective of the external labour market environment, while remaining consistent with the delivery of safe, secure, and resilient airport operations.

The forecast recognises that wage growth is influenced by a combination of factors that are largely outside the airport operator’s short-term control, including:

- Economy-wide inflation and cost-of-living pressures;
- Labour market conditions and skills availability, particularly in operational and technical roles;
- Sector-specific competition for staff; and
- National and sectoral pay bargaining dynamics.

In developing payroll assumptions, Dublin Airport has sought to strike an appropriate balance between:

- Affordability for users, by avoiding the automatic pass-through of short-term volatility; and
- Operational sustainability, by ensuring the airport can recruit, retain, and motivate the workforce required to meet regulatory, safety, and service quality obligations.

Payroll inflation has therefore not been treated as a uniform uplift across all staff categories. Instead, wage growth assumptions reflect the underlying composition of the workforce whereby there are differences between some frontline operational roles which currently have an unusually high proportion of new staff at the lower end of pay scales and the more mature parts of the organisation.

Payroll inflation has also been applied to non-pay costs which are materially workforce led (e.g. cleaning and PRM)

This approach ensures that payroll costs are forecast on a realistic and proportionate basis, consistent with historic experience and forward-looking labour market indicators, while avoiding over-statement of cost pressures. It also supports the IAA’s objective of allowing recovery of efficient costs only, by clearly distinguishing between unavoidable external wage pressures and areas where management retains discretion to drive efficiency.

The following subsections set out how payroll inflation assumptions have been calibrated, how they interact with cost driver elasticities, and how productivity and workforce planning have been reflected in the overall Opex forecast.

7.4.1. Base payroll inflation

Base payroll has been forecast using the Department of Finance, Budget 2026, Economic & Fiscal Outlook⁷ forecast data. This data has been summarised in the table below and gives real wage growth of 1.7% to 1.6% across the period to 2030. Dublin Airport has held the 2030 rate into 2031.

Wage inflation	2026	2027	2028	2029	2030	2031
Wage inflation	3.9%	3.6%	3.6%	3.6%	3.5%	3.5%
CPI	1.9%	1.9%	1.9%	1.9%	1.9%	1.9%
Internal base real wage growth	2.0%	1.7%	1.7%	1.7%	1.6%	1.6%

7.4.1.1. Payroll inflation across Security, Retail & Operations

Front-line operational roles across Security, Retail and Operations currently exhibit a disproportionately high concentration of lower-tenure staff. This workforce profile reflects a combination of factors, including:

- Workforce attrition through voluntary severance and natural exits the suspension of recruitment during the pandemic period (2020–2022);
- The rapid ramp-up of operations to respond to passenger growth from 2022 onwards;

⁷ [Budget 2026 - Economic and fiscal outlook.pdf](#)

- Higher attrition levels since 2022 that pre pandemic; and
- Additional staffing requirements arising from the introduction and operation of new C3 security screening equipment.

As a result, a significant proportion of staff in these functions have joined within the last three years. The table below sets out the tenure profile of staff by function as at Q4 2025.

	< 3 years	3 to 6 years	7 to 15 years	> 15 years
Security	76%	3%	14%	7%
Retail	65%	6%	19%	10%
Operations	63%	2%	22%	12%

As tenure normalises over the regulatory period and staff progress through established pay bands that reflect increased capability, productivity and operational effectiveness, the average cost per full-time equivalent (FTE) in these areas is expected to increase by more than headline wage inflation.

Dublin Airport’s forecast model explicitly reflects this dynamic by:

- Modelling progression of staff through pay bands as experience and competence increase; and
- Allowing for ongoing attrition, replacement hiring and hiring to match passenger growth at entry-level pay points.

The combined effect of these factors is a period of real wage growth in affected operational functions, which is structural in nature and reflects workforce maturation rather than discretionary pay uplifts. The resulting impact on payroll costs is set out in the table below.



7.4.2. Resilience overlay on opex forecast

Airports across Europe are experiencing growing operational risks driven by climate volatility, regulatory change, technological dependency, and increasing passenger volumes. The EU’s Critical Entities Resilience (“CER”) Directive reinforces this reality by requiring Member States to classify airports as critical infrastructure and ensure they have robust risk-management and business-continuity capabilities. These requirements rely not only on capital expenditure but also on sustained operational investment to maintain preparedness, responsiveness, and resilience over time.

As the complexity and frequency of disruptive events increase (spanning security incidents, IT /equipment failures, cyber threats, supply-chain shocks, transport access issues, and climate-related events) airports must strengthen anticipative and adaptive capacities embedded in everyday operations. These are not one-off initiatives. They involve continuous monitoring,

training, simulation exercises, operational planning, and contingency resourcing. Such activities must be funded from Opex, as they represent ongoing capabilities essential to maintaining safety, service quality, and regulatory compliance.

Resilience is an operational, not solely infrastructural, discipline. Recent experience highlights that airports face increasing exposure to extreme weather, infrastructure stresses, and interconnected risks, calling for resilience measures integrated throughout the full operating lifecycle. This includes staffing, emergency readiness, and systems maintenance that cannot be delivered through capital projects alone.

Operational experience across several major European airports demonstrates why Opex-funded resilience is indispensable. Heathrow Airport has identified more than 250 climate-related risks affecting its business, from runway integrity to ground access and terminal operations. Its resilience programme depends on continuous climate-risk assessments, operational planning, and mitigation work (i.e. activities that require day-to-day operational expenditure).

Broader climate-risk research also illustrates the operational burden of resilience. European airports, like many globally, face rising threats from weather events which disrupt surface access, impact runways, and disrupt passenger presentation profile and behaviour. Preparing for these types of events require continuous operational measures such as emergency staffing, incident response, and resilience planning.

In recent years, Dublin Airport has experienced a series of operational disruptions that collectively highlight the increasing vulnerabilities facing modern aviation infrastructure. In September 2024, an ESB Network fault in North County Dublin resulted in a power outage affecting Terminal 2. The incident was compounded when the airport's backup generators failed to activate due to a voltage-related control system issue. This led to congestion, delays to at least 15 flights, and temporary suspension of core passenger-processing functions, including check-in and U.S. Pre-Clearance facilities. Although power was restored the same morning, the event demonstrated the material operational impact that can arise when external utility failures interact with on-airport systems.

A further disruption occurred in September 2025, when Terminal 2 was fully evacuated following the detection of a suspicious item of luggage. The precautionary evacuation halted scheduled operations for several hours and caused widespread knock-on delays across international services.

These localised incidents coincided with broader systemic shocks affecting European aviation. The Collins Aerospace MUSE system outage, a cyber-related disruption of electronic check-in, boarding-pass, and baggage-tagging systems, forced airlines at Dublin and other major European hubs to revert to manual processing for extended periods, significantly slowing passenger throughput and degrading schedule performance. Similarly, the global CrowdStrike outage of July 2024 caused critical Windows-based systems at airports across Europe to crash, leading to suspended arrivals, widespread cancellations, and large-scale reliance on contingency procedures.

Other significant events across Europe include:

- Nationwide UK Air Traffic Control Radar Failure (July 2025)
- Heathrow Airport Power Supply Failure (March 2025)
- By 2025, European ATC delays had more than doubled over the previous decade.
- US winter storms (January 2026)

Taken together, these events demonstrate a clear pattern: airport operations are increasingly exposed to a combination of external utility failures, security-driven operational stoppages, third-party IT system vulnerabilities and regular weather and ATC delays and disruptions. Each of these has the potential to produce immediate, material impacts on passenger processing capacity, airline punctuality, and the resilience of the wider aviation network. The incidents underline the importance of maintaining robust operational-resilience measures, including redundancy in power systems, diversification of IT dependencies, and contingency resourcing, to ensure continuity of service in line with regulatory expectations for safety, reliability, and consumer protection.

If operational resilience is not properly funded, Dublin Airport faces increased risk of service disruption, higher emergency response costs, compliance challenges under the CER Directive, and reputational damage. Embedding resilience into the Opex forecast ensures that Dublin Airport remains reliable, safe, and aligned with European best practice. It safeguards national connectivity, protects passenger experience, and supports the long-term stability of Ireland's aviation ecosystem.

Dublin Airport's proposition has embedded resilience through:

- CIP projects that address resilience gaps (e.g. MV resilience)
- 2026 opex baseline that includes the full year cost of increased service levels across critical assets
- Contingency staffing included in the opex forecast across security and service delivery front line staff:
 - Security staff forecast includes n+1 lanes
 - Service delivery staff increased by 5%

Allowing operational resilience within the Opex forecast is not optional but an essential requirement for Dublin Airport to meet regulatory obligations, manage increasing risks, and operate at the standard expected of a modern European hub.

8. Strategic Drivers of Operating Expenditure

Dublin Airport's operating expenditure over the coming regulatory period is shaped by a set of interconnected strategic drivers that reflect the realities of running a major international airport under significant regulatory, capacity, and service-quality pressures. The airport must manage increasing passenger demand, strict compliance obligations, and the complexity of delivering capital projects within a live operational environment, all while maintaining resilient, safe, and passenger-focused operations. These drivers do not operate in isolation; rather, they reinforce one another and collectively define the cost base required to provide a functioning, compliant, and competitive national airport.

8.1. Regulatory Compliance and Safety Obligations

Regulatory compliance remains the foundational requirement for Dublin Airport's operations. The airport must continuously meet evolving safety, security, environmental, and governance obligations set by the IAA, EASA, ICAO, and a range of other authorities. Delivering on these obligations requires a robust and well-resourced operational environment: trained personnel, continuous safety oversight, specialist inspections, and ongoing investment to maintain certifications and operational approvals.

Compliance is not a static state; it evolves as regulations tighten, new directives are introduced, and standards rise across European aviation. Associated Opex therefore reflects the need to ensure that Dublin Airport maintains the safe and compliant environment required to operate an international gateway.

8.2. Passenger Growth and Infrastructure Capacity Constraints

Dublin Airport continues to experience strong passenger demand, and forecasts indicate sustained pressure on the system in the years ahead. This growth alone drives additional Opex, as higher volumes increased staffing needs, extend operational hours, and intensify wear on infrastructure. However, the impact is amplified by the fact that the airport is operating within infrastructure that is already capacity-constrained.

These constraints mean that incremental demand cannot be absorbed efficiently. Instead, the airport must deploy disproportionate operational resources simply to maintain service levels. Managing long queues, supporting congested processes, supervising crowded terminal zones, operating remote stands, and implementing manual workarounds all carry additional operating costs. In effect, Dublin Airport is managing not only growth but growth within a system that is operating above its intended design capacity.

As a result, Opex does not rise linearly with passenger numbers; it rises at an accelerated rate because of the operational inefficiencies inherent in working within a constrained environment. Maintaining safety, service quality, and regulatory compliance at these volumes requires significant additional investment in people, processes, and infrastructure support.

8.3. Passenger-Centric Efficiency

Despite these pressures, Dublin Airport remains committed to providing a high-quality passenger experience. Achieving passenger-centric efficiency requires targeted operational expenditure on the resources and systems that make the airport function smoothly from the customer's perspective. This includes maintaining predictable processing times, providing accessible information, ensuring clean and comfortable facilities, and delivering effective customer-service support.

These investments are essential to protecting service standards in the face of growing demand and infrastructure limitations. They enable passengers to move through the airport safely, efficiently, and with confidence, even under challenging operating conditions.

8.4. Operational Resilience

Operational resilience has become a strategic priority across global aviation, and Dublin Airport is no exception. Weather disruptions, staffing market tightness, global supply-chain volatility, and the complexity of airport systems all require an operating model that can absorb shocks and recover quickly. Building and maintaining this resilience requires additional expenditure on contingency staffing, emergency preparedness, redundant systems, and proactive maintenance regimes.

These investments allow the airport to respond to irregular operations, maintain continuity during disruptions, and protect the integrity of the wider aviation ecosystem. In a constrained airport, resilience is even more resource-intensive, as operating buffers are smaller and the system has less natural flexibility.

8.5. Sustainability

Sustainability commitments and regulatory climate obligations continue to drive Opex requirements across the airport campus. Meeting carbon-reduction targets, upgrading energy systems, supporting waste-reduction programmes, and preparing for new airline technologies all require sustained operational resources. As Dublin Airport progresses toward its ESG commitments, it must fund the monitoring, reporting, and operational programmes that underpin decarbonisation, including the early transition to more energy-efficient systems and equipment.

8.6. Technology and Digital Transformation

Digital transformation plays a crucial role in improving efficiency, enhancing resilience, and elevating the passenger experience. Operating modern airport platforms, from A-CDM systems to security technology, digital passenger interfaces, analytics tools, and cybersecurity defences, requires ongoing operational funding. Licensing, maintenance, monitoring, and skilled staffing remain essential to ensuring that these systems deliver the benefits expected of a modern European hub. In many cases, technology also partially offsets the operational inefficiencies created by infrastructure constraints.

8.7. Delivering Capital Projects in a Constrained Airport

Dublin Airport's capital programme is essential to resolving long-standing capacity constraints and enabling the airport to operate more efficiently and more sustainably in the future. However, capital delivery itself generates additional operating costs, particularly in a campus that is already congested.

There are two distinct but interrelated Opex impacts.

- First, until new infrastructure is delivered, the airport must continue to operate within the physical constraints of the existing system. As outlined earlier, this requires additional staffing, more intensive maintenance of ageing assets, and greater operational intervention. The closer the airport gets to full utilisation of its facilities, the more resource-intensive day-to-day operations become.
- Second, building major capital projects in the middle of a live airport requires extensive operational adjustment. Areas must be decanted or relocated to make space for construction, stand and gate availability is reduced, aircraft movements must be carefully reconfigured, and temporary facilities are often required. These adjustments carry significant operational costs, ranging from additional bussing and towing to new layouts, transition management, commissioning costs, and enhanced safety oversight to protect both workers and passengers during construction.

In effect, the airport must invest today to create the conditions that will ultimately resolve its operational constraints. Operating in a constrained environment and making room for construction are unavoidable drivers of higher Opex during the transition period.

8.8. Inflationary Pressures and the Broader Cost Environment

Finally, Dublin Airport's operating expenditure is influenced by the wider economic environment. Wage inflation—particularly in skilled operational and technical roles—energy costs, contracted service pricing, and material costs have all increased significantly in recent years. These market-driven factors apply to airports across Europe and represent a structural cost backdrop against which Dublin Airport must operate.

9. Proposed Opex for 2027–2031

9.1. Overview

Dublin Airport’s proposed operating expenditure per passenger for the 2027–2031 regulatory period shows a modest and well-controlled increase over the period, particularly before the impact of additional assets or new VCP screening requirements is taken into account.

	2027	2028	2029	2030	2031	2032	2033
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

On a like-for-like basis, opex per passenger excluding the impact of a congested airport, the Capital Investment Programme and the additional VCP resourcing increases [REDACTED]. This limited growth reflects a strong focus on efficiency and cost discipline, despite a challenging operating context. Further cost increases come from the impact of congestion on the operation, changed requirements for VCP screening and the opex related to CIP additions.

The underlying increase is driven primarily by:

- Prevailing wage inflation, and
- The operational reality of an airport already operating at capacity accommodating [REDACTED] passenger growth with limited additional infrastructure.

In this context, higher activity levels necessitate increased service inputs, such as more frequent cleaning, enhanced wayfinding support and additional customer service resources, to maintain service quality in the increasingly restricted capacity.

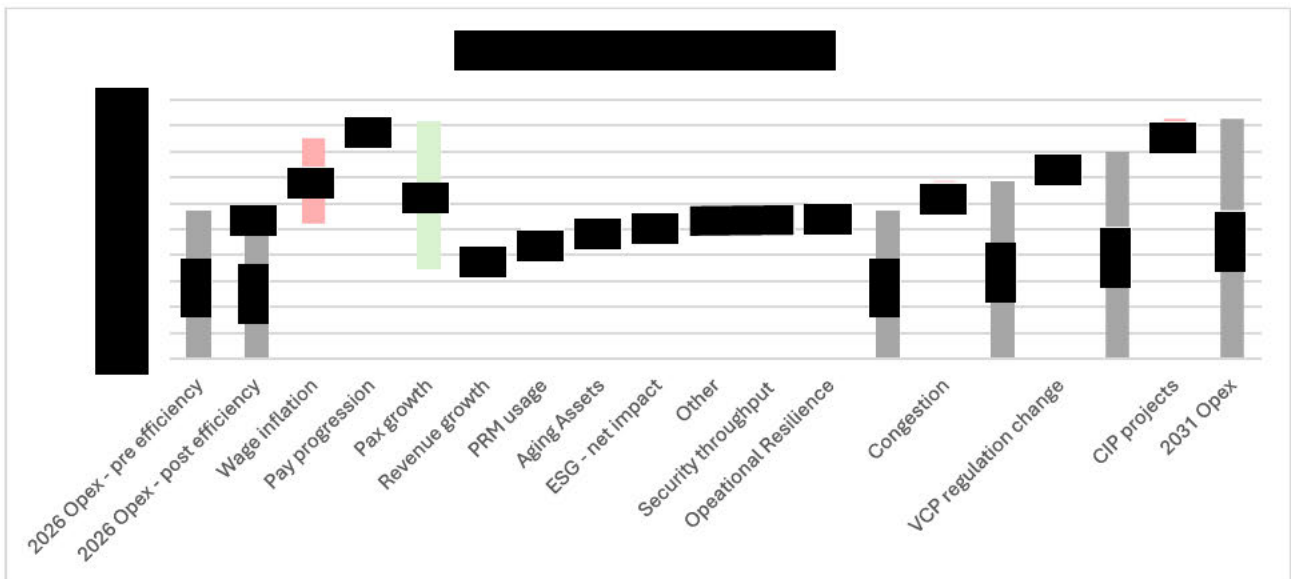
Importantly, these opex levels are designed to fully accommodate passenger growth while maintaining service quality at current high levels, ensuring resilience and consistency of the passenger experience in a capacity-constrained environment. At the same time, the proposed operating framework supports the delivery of [REDACTED] of additional commercial revenues in real terms over the period, reinforcing the value delivered to both passengers and the wider system.

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Core operating expenditure remains well controlled over the period, increasing gradually from [REDACTED]. This reflects modest, steady growth across both payroll and non-pay costs, with no material step-changes year-on-year. Excluding the impact of CIP and incremental VCP resourcing, the underlying cost base shows a stable and predictable trajectory, consistent with a disciplined approach to cost management over the medium term.

9.1.1. Opex per passenger development

The graph below outlines the development of opex per passenger between 2026 and 2031.



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Real wage inflation is the single largest upward driver over the period and reflects external labour market conditions rather than discretionary growth. The assumption is based on Department of Finance projections and is consistent with economy-wide wage pressures and is necessary to maintain a suitably skilled and experienced workforce in safety-critical and operationally complex roles. This increase supports service continuity and resilience.

[REDACTED] Pay progression reflects contractual and structural increases associated with staff tenure and progression through established pay scales. This is a predictable and unavoidable cost driver that supports retention, reduces turnover and avoids the higher costs associated with recruitment, training and operational disruption, thereby representing prudent long-term cost management.

[REDACTED] Passenger growth delivers a significant offset to underlying cost pressures by spreading largely fixed and semi-fixed operating costs across a higher volume of passengers. While congestion within the airport limits the full realisation of scale benefits, the net effect remains materially beneficial, demonstrating that the airport continues to absorb growth efficiently and protect affordability on a per-passenger basis. Passenger growth adds €26m or 6% to the 2026 cost base by 2031, primarily across facilities & cleaning, security and repairs and maintenance.

[REDACTED] Revenue growth contributes a modest increase to opex per passenger, reflecting the operational costs required to support €89m of expanded commercial activity. These costs are directly linked to the delivery of higher non-aeronautical revenues, which in turn reduce the overall cost burden on airlines and passengers, ensuring a balanced and value-for-money outcome.

[REDACTED] Increased PRM usage reflects both higher passenger volumes and changing passenger demographics. The associated cost increase is necessary to meet statutory obligations and service quality standards, ensuring accessibility and inclusivity. These costs are demand-led, carefully controlled and aligned with best practice in passenger assistance provision.

[REDACTED] As core infrastructure continues to operate beyond its original design life, incremental maintenance and reliability costs arise. This increase reflects prudent asset stewardship, ensuring safety, availability and performance while avoiding the higher costs and disruption that would result from deferred maintenance or asset failure.

[REDACTED] The net ESG impact is minimal, reflecting a balanced approach where new sustainability-related costs are largely offset. Increases are seen in increased water charges from FCC, the cost of moving to an electric airside bussing fleet. Environmental objectives are being progressed in a cost-conscious manner, with negligible impact on passengers.

[REDACTED] The “other” category captures a range of minor, diverse cost drivers that are individually immaterial but collectively necessary to support day-to-day operations. These include technology, compliance and operational support costs, all of which are tightly managed and do not represent structural cost expansion.

Improvements in security throughput efficiency partially offset cost pressures by enabling more effective use of staff and infrastructure. These gains arise from operational learning, process refinement and technology deployment, demonstrating that productivity improvements continue to be realised within security operations.

A modest increase is included to enhance operational resilience in a capacity-constrained environment. This reflects targeted buffering in critical areas to reduce the risk and impact of disruption, improving reliability for passengers and airlines. The cost is proportionate and materially lower than the economic and passenger costs of service failure. While the cost is reflected in security and facilities, this represents a general risk across the entire cost base.

passenger growth within a highly constrained airport footprint increases operational congestion across terminals, piers and the airfield, reducing efficiency and requiring higher levels of active frontline management. This drives additional resourcing for queue and crowd control, customer service intervention, pier and gate management, bussing coordination and supervisory oversight, as well as increased operational friction across security, cleaning and facilities. The resulting cost pressure reflects the unavoidable cost of maintaining safe, quality, resilient and orderly operations in a capacity-constrained environment.

After all underlying drivers, opex per passenger excluding CIP additions and VCP resourcing increases only modestly relative to 2026. This demonstrates that inflationary and structural pressures are largely offset through efficiencies and passenger growth, resulting in a stable and predictable cost trajectory.

The increase associated with VCP resourcing reflects new and evolving security requirements. These costs are phased, transparent and strictly necessary to maintain compliance and security effectiveness. They are treated separately to clearly distinguish the incremental and uncertain nature of these costs.

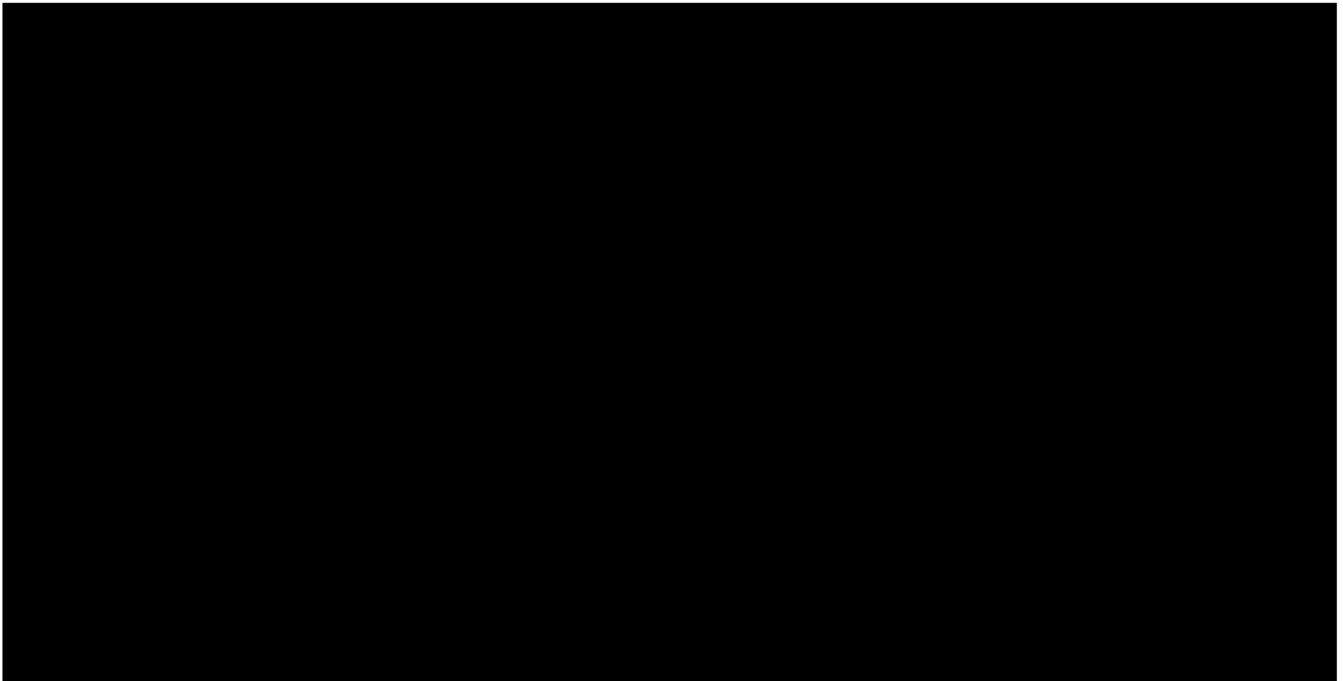
2031 opex per passenger – Excluding CIP impacts, the opex per passenger remains tightly controlled, reinforcing that new capital investment is not being used to inflate the operating baseline and that cost increases remain modest and justified.

CIP impact – new asset additions New asset additions result in incremental operating costs associated with running and maintaining enhanced infrastructure. These costs are proportionate to the scale of investment and are offset by improvements in asset reliability, capacity and passenger experience, supporting long-term operational efficiency.

2031 total opex per passenger By 2031, total opex per passenger increases by a limited amount relative to 2026, reflecting a carefully balanced outcome. The bridge demonstrates that cost increases are largely unavoidable, efficiency-tested and necessary to support safety, resilience, accessibility and service quality, while maintaining affordability for passengers and airlines over the regulatory period.

9.1.2. Opex cost development

The graph below outlines the development of opex costs between 2026 and 2031.



9.2. Major cost categories

9.2.1. Central Security Payroll Costs

In the 2022 pricing decision, the allowance for security resourcing did not fully reflect the staffing levels that daa had forecast would be required to support the operational deployment of C3 cabin baggage screening equipment. daa’s submissions at the time anticipated a material uplift in in-lane and supporting security resources as the C3 rollout progressed; however, this uplift was not incorporated into the regulatory settlement. As a result, by 2026, security FTEs are projected to be approximately 35% higher than the level implied by the IAA forecast, while passenger volumes are expected to be around 5% higher over the same period.

Security Forecast Accuracy

Dublin Airport’s 2026 security forecast, prepared in 2022, provided for 1,163 Security FTEs to support 34.1 million passengers. Relative to the 2026 Budget outturn, this represents a variance of approximately 3% in FTEs, with FTEs per passenger around 7% lower than originally forecast, indicating a high degree of forecast accuracy.

By contrast, the IAA’s Final Determination allowed for 881 Security FTEs to support 35.7 million passengers in 2026. This implies a 35% variance relative to the 2026 Budget and an FTEs-per-passenger assumption approximately 29% higher than the forecast outturn.





Dublin Airport places significant emphasis on understanding the operational realities of its security function and invests considerable effort in developing its forecasts, including detailed engagement with frontline operational teams. The comparatively low variance between forecast and outturn demonstrates the robustness of this approach and the value of forecasts grounded in detailed operational planning.

The cost impact of this divergence has been partially mitigated through a lower average cost per FTE, reflecting sustained attrition and changes in the experience mix across the security workforce. Notwithstanding these efficiencies, the cumulative effect over the period has been that approximately €30 million (around 14%) of security operating expenditure has not been funded through the regulatory settlement. This expenditure has nonetheless been incurred by daa in order to deliver the staffing levels originally forecast as necessary, and to maintain a safe, secure, and reliable security operation in compliance with statutory and regulatory requirements.

This opex category includes staffing within the security function covering:

- Central search & FastTrack
- Vehicle control posts
- Supervisors, duty managers and resource optimisation managers
- Equipment testers
- Training partners

The roll out of C3 equipment has been completed between May 2023 and December 2025 across central search in T1 and T2, with roll out across other security posts (e.g. staff screening, VCPs) continuing into 2026. As such, 2026 will be the

9.2.1.1. Forecast methodology

The security forecast for the 2027–2031 regulatory period has been developed on the basis that the transition to C3 security screening technology has now been completed and embedded within day-to-day operations at Dublin Airport. As a result, it reflects a stable operating environment in which the benefits of C3 implementation are expected to be progressively realised.

This approach allows the forecast to incorporate scope for improved operational performance over the regulatory period. In particular, the security resourcing model reflects continued improvements in FTE efficiency as staff familiarity with C3 processes increases and operational deployment is further optimised. These efficiency gains are reflected in both workforce planning assumptions and throughput performance expectations.

Consistent with this position, the security forecast is aligned with Dublin Airport’s enhanced service quality commitment, under which 90% of passengers are expected to pass through security in less than 20 minutes on a monthly basis. The forecast therefore supports higher service standards while maintaining a disciplined and efficiency-tested approach to resourcing,

ensuring that performance improvements are delivered through operational maturity rather than through structural increases in the underlying cost base.

9.2.1.2. Base demand

Dublin Airport's forecast for security is driven by the busy day forecast for different passenger levels and includes ambitious improvements in through-put and attrition levels:

- **Throughput** (in terms of trays) in 2025 was 380 in T1 and 350 in T2, with T1 benefiting from some longer lanes. Throughput has been forecast to increase to 420 (+11%) in T1 and 380 (+9%) in T2. This equates to a saving of x FTEs and €m in 2031, and €m across the forecast period.
- **IPP** is forecast to remain at 1.4 in both T1 and T2

T1, T2 and the T1 Mezz are forecast separately based on the busy day schedule, with this cascaded over the year. Lane demand is built up based on passengers per hour to give the number of hours required on a busy day and week, with this turned into staffing demand.

Static posts are included in the forecast and comprise fixed, presence-based security roles that must be staffed to meet regulatory, safety, and operational requirements and therefore do not flex with passenger throughput. These posts cover critical control points across the terminal environment, including Fast Track access points, internal and landside queue management, transfer corridors for connecting passengers, and automated access controls such as Autopass and secure doors. They also include staff entry points at both arrivals and departures levels, swing gates, and third-state sweeps, all of which are required to maintain secure segregation and regulatory compliance regardless of passenger volumes. In addition, static posts support VIP and Platinum Services, where dedicated security presence is required for service and protection reasons. Collectively, these roles provide the fixed baseline of the security operation, ensuring continuous access control, queue oversight, and compliance with the airport security programme, and are therefore held broadly constant within the security forecast over time.

Staffing demand incorporates two distinct adjustments. First, a 28% non-availability factor reflecting benchmark levels of sickness, leave, training and other paid non-productive time, consistent with workforce-planning guidance and absence benchmarks. Second, a 12% roster coverage allowance to provide roster coverage across the peaks and troughs of a busy day and ensure minimum service levels are maintained in regulated, service-critical operations. These adjustments address different risks, availability loss and coverage sufficiency, and therefore are additive rather than duplicative.

9.2.1.3. 28% non-availability assumption

In forecasting staffing requirements, it is necessary to distinguish between contracted headcount and effective rosterable capacity. The 28% non-availability assumption reflects the proportion of paid time during which staff are not available to be rostered to operational demand due to statutory, contractual, and regulatory requirements. It represents expected and recurring non-productive time, not contingency or operational slack.

Annual leave is the largest component of this adjustment. Employees are assumed to have a contractual annual leave entitlement of 25 days, in addition to 10 public holidays per annum. For a full-time employee with approximately 260 potential working days per year, this equates to 35 paid days not worked, or 13.5% of annual working time ($35 \div 260$). This figure represents a

theoretical minimum, assuming leave can be perfectly smoothed across the year. In practice, the effective impact of leave in rostered, service-critical operations is higher due to a number of structural factors, including:

- Leave being taken in blocks rather than evenly distributed, which can remove entire roster lines or materially reduce coverage over sustained periods;
- The concentration of public holidays on fixed dates, often coinciding with peak demand periods and limiting the ability to smooth absences across the year; and
- Skill and role interaction effects, whereby the absence of staff in specialist or safety-critical roles cannot always be readily substituted, leading to a disproportionate loss of usable rosterable capacity.

Taken together, these factors mean that the operational impact of annual leave and public holidays is materially greater than the simple calendar calculation. Accordingly, a planning allowance of 18% is applied to reflect the effective loss of rosterable capacity associated with annual leave and public holidays, rather than the nominal contractual entitlement.

The remaining elements of the 28% reflect other unavoidable sources of non-availability. Sick absence is assumed at 7-8%, consistent with expected average levels in operational and shift-based roles. Finally, other statutory and paid leave (such as family-related leave, force majeure leave and jury service) contributes 2-3%, representing small but persistent absences that must be recognised in planning.

Taken together, these components produce a total non-availability factor of approximately 28%, representing expected paid time during which staff cannot be rostered to demand. This adjustment ensures that staffing forecasts reflect realistic operational capacity rather than theoretical headcount and avoids systematic understating of required resources.

9.2.1.4. 12% coverage allowance

The 12% coverage allowance is applied after adjusting staffing levels for non-availability and serves a distinct purpose from the 28% assumption. While the 28% reflects paid time during which staff are not available to be rostered, the 12% allowance reflects the additional capacity required to reliably meet operational demand in a service-critical, rostered environment.

Availability-adjusted headcount alone is insufficient to ensure consistent service delivery because operational demand is neither smooth nor predictable throughout the day. Demand typically fluctuates sharply, with an early-morning peak, followed by a trough, a further peak in mid-morning, and additional pronounced peaks in the late afternoon and evening. In addition to these structural intraday patterns, passenger presentation varies materially due to a range of external factors, including road traffic conditions, weather disruption, and the composition of passengers arriving at the terminal. For example, large cohorts such as school tours can present simultaneously, creating short-duration surges that cannot be absorbed by staffing levels based on average demand. These demand fluctuations must also be managed alongside statutory and contractual staff break requirements, which temporarily remove staff from active duty during peak operating periods. Taken together, these factors mean that staffing models based solely on average demand and availability would systematically under-resource peak periods, necessitating a standing coverage margin to maintain service levels.

The 12% allowance represents a measured and proportionate coverage margin, consistent with common practice in service-critical, shift-based environments, where coverage buffers in the range of approximately 10–15% are typically required to maintain reliability. At 12%, the allowance sits toward the lower end of this range, indicating a cost-conscious approach rather than conservative over-staffing.

Importantly, the coverage allowance does not double-count any element of the 28% non-availability adjustment. The two assumptions address different risks: the 28% captures time when staff are not available to work, while the 12% captures the additional capacity required to ensure that the remaining available workforce can consistently meet demand. Applied together, they ensure that staffing forecasts reflect realistic operational capacity and resilience rather than theoretical headcount.

9.2.1.5. Forecasting for operational resilience: n+1 lane resourcing

The n+1 resourcing assumption represents a targeted staffing resilience measure designed to protect against role-critical operational failure within the security screening process. It addresses a risk that is not mitigated by either the 28% non-availability adjustment or the 12% coverage allowance, both of which operate at an aggregate capacity level rather than at the point of delivery.

The 28% adjustment converts contracted headcount into effective availability by accounting for predictable, structural absences such as leave, sickness, and training. The subsequent 12% coverage allowance provides additional capacity to manage intraday demand volatility, passenger-presentation variability, staff breaks, and roster inefficiencies once staff are available to work. However, neither of these adjustments protects against situations where the temporary loss or redeployment of a single officer results in the closure or degradation of an entire security lane.

Security screening is characterised by binary operational dependencies: a lane can only operate if all required roles are simultaneously filled. Where staffing is planned exactly to the number of lanes intended to be open, routine operational events, such as regulatory interventions, welfare issues, incident response, or the need to redeploy an officer at short notice, can remove one critical role and immediately render a lane inoperable. This produces a step-change loss of capacity that is disproportionate to the underlying headcount shortfall and cannot be absorbed through average coverage margins.

The n+1 resourcing layer provides a narrow but essential margin of staffing resilience to address this exposure. It ensures that the planned number of lanes can continue to operate during normal, credible disruption without reliance on emergency overtime, reactive redeployment, or acceptance of service failure. In doing so, n+1 resourcing safeguards compliance and service continuity at the point where security capacity is most fragile, translating operational-resilience principles into a practical staffing assumption rather than a reactive intervention.

Taken together with the 28% and 12% adjustments, the n+1 allowance completes a layered resilience model: availability risk is addressed first, demand variability second, and role-critical failure third. This approach ensures that security staffing forecasts reflect not only average capacity requirements, but also the operational realities of delivering a statutory, service-critical function in a constrained environment.

9.2.1.6. Vehicle control posts

Two changes will impact the staffing levels at vehicle control posts:

- a) The introduction of C3 security equipment
- b) New EC regulations on searching of supplies entering the airport

Dublin Airport is in the process of introducing next-generation C3 Computed Tomography (CT) screening equipment at the Vehicle Control Posts (VCPs) as part of its ongoing compliance with evolving EU aviation security standards. C3 technology provides enhanced three-dimensional imaging and automated threat detection, significantly improving the effectiveness and consistency of security screening compared with legacy X-ray systems. While this represents a material enhancement in security capability, it also increases the level of staffing required at the VCP.

[REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

- [REDACTED]

[REDACTED]

- [REDACTED]

[REDACTED]

- [REDACTED]

[REDACTED]

- [REDACTED]

[REDACTED]

The combined effect of higher screening volumes and the introduction of C3 CT technology is particularly significant for staffing. As the percentage of supplies subject to screening rises, each C3 lane will experience materially higher utilisation, with increased demands for alarm

resolution, secondary inspection and supervisory oversight. To avoid congestion, delivery delays and knock-on operational impacts across the airport campus, additional VCP staffing will be required, both to operate screening equipment and to manage the wider process.

Dublin Airport's preliminary analysis of the impact of these changes is to double the level of VCP staffing.

9.2.1.7. Supervision and span of control

Effective supervision is a critical component of the security operating model, underpinning regulatory compliance, operational control, and service quality. The supervision model is based on a span of control of one supervisor for every 15 front-line security roles, which is consistent with regulatory requirements and established airport security practice.

This ratio reflects the need for active, in-lane supervision on every shift, rather than remote or supervisory oversight in name only. Team Supervisors are responsible for ensuring compliance with screening procedures, managing real-time operational issues, supporting staff welfare and performance, and maintaining the quality and consistency of security outcomes. Regulatory requirements explicitly require that a supervisor is responsible for screeners of cabin baggage to assure appropriate team composition, quality of work, training, support, and appraisal (EU Regulation 2015/1998, as amended). When benchmarked against comparable airports, a 1:15 ratio is mid-range and consistent with peer practice, including airports such as Paris and Zurich.

In addition to direct operational supervision, supervisors are required to undertake a range of mandatory administrative, compliance, performance management and coordination activities that remove them from active in-lane oversight for part of each shift. These include incident reporting, regulatory documentation, staff performance management, certification and training coordination, audit preparation, and engagement with operations management and the Security Operations Centre. To ensure that active supervision is maintained while these essential tasks are performed, a 15% supervisory buffer is incorporated into the model.

This buffer does not represent additional layers of management or discretionary overhead. Rather, it reflects the structural reality that supervisors cannot be continuously present in-lane while also fulfilling mandatory governance and compliance obligations. Without this allowance, the effective span of control would widen beyond 1:15 during normal operations, undermining the intent of the supervision model and increasing compliance and service risk.

Taken together, the 1:15 supervision ratio, supplemented by a 15% buffer for non-operational supervisory duties, ensures that active, compliant supervision is consistently available at the point of delivery. This approach balances operational efficiency with regulatory assurance and reflects a proportionate response to the supervisory demands of a service-critical, regulated security operation.

9.2.1.8. Other roles

All other roles, Duty Managers, Resource Optimisation Coordinators, Equipment Testers and Training Partners are forecast to remain at current levels for the forecast period.

9.2.2. Facilities & Cleaning Staff Costs

Facilities and Cleaning staff costs have been forecast using a bottom-up methodology, built from detailed task-level requirements. The approach identifies the specific activities required to support airport operations, the resources needed to deliver those activities, and the associated staffing levels and costs. This ensures that the forecast reflects the operational reality of the facilities and cleaning function and is directly linked to service requirements, rather than relying on high-level averages or historic ratios.

Base demand

Facilities and Cleaning staff costs have been developed using a detailed bottom-up approach grounded in operational reality. The process begins with the busy day schedule, reflecting peak passenger demand conditions. Passenger flows are then mapped across terminals using the stand plan, anticipated aircraft movements, and terminal occupancy, with particular attention to known capacity constraints and operational pinch points. The physical footprint of the airport estate is overlaid onto this analysis to determine the cleaning, facilities, and support activities required across different zones and time periods. Resource requirements are assessed at task level, taking account of service standards, regulatory obligations, and operational resilience. This work is undertaken by the operational management team, drawing on their detailed understanding of how the airport functions in practice and how staffing must be deployed on the ground to safely and effectively support passenger and airline operations. As a result, the forecast staffing levels and costs are directly linked to observable operational needs rather than derived from high-level ratios or historic averages.

9.2.2.1. Non-availability assumption

For team member and Team Lead roles, the same 28% non-availability assumption has been applied. For service deliver manager roles, a 20% assumption is applied.

9.2.2.2. Coverage allowance

Coverage allowances vary by task type and reduce over time as teams become more fully established and operational resilience improves.

- In-house cleaning: No coverage allowance is applied. Demand for cleaning activity is relatively stable across the year, with lower passenger volumes during winter broadly offset by increased cleaning requirements arising from seasonal conditions (e.g. wetter floors, more delays). As a result, overall resourcing requirements do not vary materially between summer and winter periods.
- Service Delivery Team Member: A 10% coverage allowance is applied in 2026 to facilities operations, reflecting the comparatively stable and predictable nature of demand in this area relative to security functions. This allowance reduces progressively to 4% by 2031, as fuller team establishment increases robustness and reduces the need for additional coverage. Unlike security operations, facilities activities are not subject to sharp intra-day demand spikes or regulatory queue-time thresholds that require significant operational buffering. The coverage assumption therefore reflects lower demand variability while maintaining sufficient flexibility to manage minor operational disruption and ensure service continuity across the airport estate. Team member roles are assumed to be 15% lower during winter months, consistent with seasonal operating requirements.

- Service Delivery Team Lead and Manager: No coverage allowance is applied, reflecting the nature of these roles and their requirement for continuous on-site leadership, oversight and decision-making.

9.2.2.3. Service Delivery Team members

The forecast for Service Delivery Team Members has been developed on a bottom-up, task-led basis to ensure that staffing levels are directly linked to the operational requirements of running a safe, compliant and high-quality airport in a capacity-constrained environment. The need for additional Service Delivery resourcing is driven by a set of structural factors described earlier in this proposition: sustained passenger growth without commensurate terminal capacity, increased operational congestion and passenger dwell time, changing passenger demographics and behaviours, and the increasing need for active queue management, wayfinding and passenger safety interventions across constrained pinch points. In particular, the operating experience since 2022 demonstrates that Dublin Airport has had to accommodate strong traffic growth within an unchanged footprint while maintaining service performance, which inherently increases the on-the-ground management required to keep passenger flows safe, orderly and predictable. These factors mean that additional Service Delivery staffing is not discretionary: it is required to maintain service standards, manage safety risks and protect users' reasonable interests in the face of physical constraints and intensifying demand.

- Landside delivery (+7.2 FTEs). Landside delivery resourcing increases by 7.2 FTEs, primarily reflecting additional operational interventions that are necessary to manage passenger volumes and congestion outside the terminals. This includes 1.2 FTEs for the trolley management team, required to accelerate trolley circulation from the wider campus back into terminal areas (including airside), where trolley availability has a direct impact on passenger experience and terminal flow. This requirement strengthens as aircraft size and baggage volumes increase; wide-body flights are expected to rise materially over the period, with a particularly pronounced increase in Terminal 1, which increases trolley demand and the speed of turnaround required to keep circulation functioning effectively. In addition, taxi rank operations require +8.0 FTEs due to increased pressure on landside passenger flows and safety-critical crowd management. A new taxi rank configuration in Terminal 1 from 2026 increases operational complexity (two lanes rather than one), requiring additional active management to maintain orderly boarding and reduce conflict points. In Terminal 2, the passenger safety risk associated with queue growth toward the escalator requires constant, visible staffing presence as queues build and passenger circulation becomes more constrained. These requirements are fundamentally driven by growth occurring ahead of capacity enhancements, increasing the need for manual interventions to protect safety and service quality.
- Landside trolley driving (+0.5 FTEs). Landside trolley driving increases by 0.6 FTEs, mirroring the required uplift in trolley management as passenger volumes grow and as trolley circulation distances increase across the wider campus. This resourcing is necessary to maintain trolley availability at critical points and to prevent knock-on congestion in terminal forecourts and arrival/departure interfaces, particularly during peak operating periods when the system's tolerance for delay is lowest. The forecast reflects the operational reality that, as the airport operates closer to effective capacity, small degradations in landside logistics can translate quickly into passenger friction and congestion costs.

- Terminal delivery (+24.8 FTEs). Terminal-based Service Delivery staffing is forecast to increase by 24.8 FTEs to maintain safe passenger flows and predictable service outcomes within increasingly constrained terminal environments.
 - First, the departures check-in function, currently operated as one combined team across Terminal 1 and Terminal 2, must be split into dedicated terminal teams as the scale and complexity of each operation increases. Service Delivery staff support desk turnaround, passenger wayfinding and real-time issue resolution at check-in, all of which become more resource-intensive as congestion grows and passenger familiarity declines.
 - Second, additional pier-based customer service coverage is required across Piers 1, 2 and 3 to manage higher gate turnaround intensity (including changeovers between airlines), and to strengthen monitoring of public order and passenger safety in high-density boarding environments.
 - Third, immigration queuing and wayfinding requires increased staffing across multiple constrained points: in Pier 1, escalators must be turned off when queues build and queuing is not permitted on the sky bridge, meaning staff must actively hold and release passengers before and after the bridge; in Pier 4, queue spill extends into arrivals areas and past the transfer corridor, requiring staffing to maintain segregation and prevent conflict between flows.
 - Fourth, the transfer corridor requires increased resourcing as queuing builds at autopass gates, with additional staff needed both within the corridor and at its entrance to manage passenger “injection” into the process and maintain flow control.
 - Fifth, increased CBP demand will require additional queue management at the point of entry to the preclearance process. Higher passenger volumes and longer dwell times increase the need for active crowd control, passenger direction and supervisory presence to maintain safety, orderly flows and service standards within a constrained facility footprint.

These additions are best understood as the minimum operational response required to maintain service quality and passenger safety in a constrained system, rather than service enhancement.

- Bussing interface (static post-2027). While bussing frequency is forecast to increase, Service Delivery resourcing associated with bussing is expected to remain broadly static (slight reduction) once the new facility opens in 2027, reflecting the expectation that the facility design will mitigate the need for further manual staffing increases. This reflects the principle applied throughout the forecast: where infrastructure solutions reduce operational friction, the forecast does not assume further structural staffing growth.

9.2.2.4. Cleaning Team members

The forecast for Cleaning Team Members has been developed using a bottom-up, activity-based approach that links resourcing directly to the operational tasks required to maintain safety, service quality and regulatory compliance in a capacity-constrained airport environment. As set out earlier in this proposition, Dublin Airport is accommodating sustained passenger growth within an unchanged terminal footprint over recent years, alongside longer dwell times airside and heightened congestion pressures. This operational context increases the intensity and frequency of cleaning interventions required to keep passenger areas safe and presentable and

to prevent minor issues (spills, waste build-up, wet floors) from escalating into safety risks and service failures. Experience since 2022 demonstrates that cleanliness is a visible and material driver of passenger satisfaction, and that maintaining acceptable standards requires appropriate resourcing. In addition, Dublin Airport has faced service quality pressures in cleanliness-related metrics in recent years, with washroom cleanliness and other passenger-experience factors contributing to outcomes below the Quality of Service target and resulting in penalties to the price cap. Against this backdrop, additional cleaning resourcing is not discretionary: it is a necessary operational response to higher throughput, more congested passenger flows, changing passenger behaviours and sustained use of facilities, all within a constrained estate.

- Landside cleaning (+5.1 FTEs). Landside cleaning FTEs are forecast to increase by 5.1, reflecting the introduction of a wider campus cleaning task that is required to keep the expanded airport campus clean, safe and operationally efficient. All passenger growth, both arriving and departing, uses the campus environment (forecourts, approaches, circulation routes), increasing litter, waste handling needs and the frequency of interventions required to maintain basic hygiene and safety standards. This is a direct consequence of growth being accommodated through a constrained campus and terminal system, where passenger activity increasingly extends into landside areas and therefore increases cleaning workload outside the terminal footprint.
- Front-of-house terminal cleaning (+29.7 FTEs). Front-of-house terminal cleaning is forecast to require an additional 29.7 FTEs, driven by two unavoidable factors.
 - First, due to increased passenger flows within already constrained terminal areas, a scheduled deep-cleaning task team is required to protect standards and asset condition through a rotating programme of intensive cleaning activity. This approach allows critical areas to be taken in sequence (zone-by-zone) for deeper interventions that cannot be delivered effectively through routine “on-the-run” cleaning while passenger throughput remains high. The deep-clean programme would typically include activities such as foaming/scrubbing hard floors, machine-cleaning and re-sealing of floor surfaces, steam or pressure cleaning of tiled and grout areas, deep cleaning of washroom fixtures and cubicle panels, high-touch surface detailing (handrails, door plates, seating touch points), spot treatment and extraction cleaning of soft furnishings/carpets where applicable, and drain/odour management in high-use washrooms and food-adjacent areas (all undertaken on a planned rotation to minimise disruption).
 - Second, routine cleaning coverage across all passenger areas must increase to manage the practical consequences of sustained growth and congestion: higher footfall and longer dwell time increases spills, waste and washroom usage, while crowding increases the likelihood that hazards (e.g., wet floors, dropped items) will trigger slips, trips or passenger frustration if not dealt with quickly. The forecast therefore reflects the minimum level of resourcing required to maintain safety and service quality outcomes as passenger density rises in a constrained footprint, rather than a discretionary enhancement.
 - Back-of-house cleaning. Back-of-house cleaning is forecast to increase marginally to keep staff corridors, welfare areas and breakrooms clean and safe as operational staffing levels and internal activity increase. The operating environment has become more complex, with greater movement of staff,

equipment and goods through narrow back-of-house routes that are not designed for sustained high-intensity throughput. This raises the cleaning workload and the need for timely interventions to prevent clutter, spillages and waste accumulation from becoming safety risks, and to ensure that staff welfare areas remain fit for purpose in a 24/7 operational environment. In a constrained airport, clean, safe corridors and welfare areas reduce the risk of incidents and help maintain workforce effectiveness, which in turn supports stable delivery of passenger-facing services. Some of this increase will be mitigated by a reduction in office cleaning.

Overall, the cleaning resourcing forecast reflects a pragmatic response to the realities described in Sections 3 and 4. Dublin Airport is operating at high utilisation, accommodating continued growth with limited physical capacity, and must therefore deploy additional operational effort to maintain baseline service standards and manage safety risks. The forecast does not assume step-change improvements in service levels; rather, it provides the staffing required to sustain acceptable cleanliness and hygiene outcomes and protect passengers and staff as congestion and facility usage intensify over the regulatory period.

9.2.2.5. Service Delivery Team Leads

Team Leads are allocated across the campus on a zonal basis and are forecast to increase by 21 FTEs over the period. This increase reflects both the higher frontline staffing levels required to operate the airport and the growing complexity and frequency of operational issues arising from increased congestion. In practical terms, this includes the addition of two Team Leads across two key operational zones, the introduction of a specialised Team Lead role, and an increased allocation of time to staff coordination, real-time issue resolution and performance management to maintain safe and effective operations.

9.2.2.6. Forecasting for operational resilience: +5% Service Delivery Team Member staffing

A 5% operational resilience allowance has been applied to the Service Delivery Team Member role to ensure continuity of service across a wide range of frontline operational activities that are time-critical and highly visible to passengers. While demand for these roles is generally predictable and planned through busy-day scheduling, the nature of the role requires flexibility to respond to short-notice operational pressures ranging from major disruptions such as IT or electricity outages or to more localised congestion, disruption to passenger flows, stand or gate changes, transport issues, or seasonal surges. Service Delivery Team Members are deployed across multiple touchpoints, including check-in, departures, immigration, transfers, and landside operations, where maintaining service standards relies on having limited additional capacity available to redeploy resources in real time. The 5% allowance provides an appropriate level of resilience to manage routine absence, minor disruption, and redeployment requirements, without introducing excessive buffering or over-resourcing.

9.2.2.7. Impact of congestion

While the direct cost of congestion is inherently difficult to isolate within aggregate operating expenditure, its impact can be evidenced through comparison with alternative modelling approaches. When the bottom-up resource assessment is benchmarked against a simple passenger-driven elasticity assumption of 0.7, the differential highlights the operational friction introduced by congestion within a constrained airport environment. This comparison indicates

that congestion results in an additional 62 FTEs and approximately €3.9 million of operating cost in this area, reflecting the increased staffing intensity required to manage reduced throughput efficiency, higher intervention rates and more complex day-to-day operations as capacity constraints bind.

9.2.3. PRM Costs

PRM costs at Dublin Airport have increased materially over recent years, reflecting a combination of structural growth in demand for PRM services and economy-wide inflationary pressures, rather than any change in service scope or standards.

9.2.3.1. Historical experience

Since 2019, Dublin Airport has experienced a significant and sustained increase in PRM usage. Total PRM users have risen by 39% between 2019 and 2025, with PRM usage per departing passenger increasing from 2.1% to 2.6% over the same period. The emerging trend into 2026 indicates a further increase to approximately 2.8% of departing passengers.

This growth is not anomalous. It is consistent with international evidence from ACI surveys, which show PRM usage across European airports increasing from around 1% of total passengers in 2019 to approximately 1.44% by 2024⁸. Dublin Airport's experience reflects this wider structural shift and is driven by similar underlying factors, most notably the increasing proportion of older passengers travelling and a greater awareness and take-up of PRM services.

In parallel with rising usage, the average cost per PRM user at Dublin Airport has increased by approximately 33% between 2019 and 2026. This increase closely tracks, but remains slightly below, forecast payroll inflation over the same period. Given the inherently labour-intensive nature of PRM services, this confirms that cost growth has been driven primarily by wage and cost inflation, rather than inefficiency or over-expansion of service provision.

Importantly, the growth in total PRM costs has therefore been the compound effect of two reinforcing trends:

- more passengers requiring assistance; and
- higher unit costs associated with delivering that assistance in a high-inflation environment.

9.2.3.2. Interpretation of the trend

The data demonstrates that PRM costs at Dublin Airport are now structurally different from the pre-2019 baseline. PRM services are no longer a marginal or static cost line; they are an increasingly material component of passenger service delivery.

While the increase in average cost per user has been notable, it has remained broadly aligned with labour cost inflation. This indicates that cost discipline has been maintained, even as service volumes have expanded materially. The dominant driver of total cost growth has been volume, not escalation in per-unit service intensity.

⁸ [New survey results shed light on airports' readiness to welcome passengers with reduced mobility | Airport](#)

9.2.3.3. Expectations for the future

Looking ahead, the evidence suggests that upward pressure on PRM costs will persist over the medium term, although the nature of that pressure will evolve.

On the demand side, PRM usage at Dublin Airport is expected to continue increasing, with projections already indicating further growth in users per departing passenger into 2026. Demographic trends point to an ageing travelling population, and there is no indication that PRM penetration will stabilise or reverse in the near term. As a result, total PRM volumes are likely to grow at a faster rate than overall passenger numbers.

Dublin Airport's forecast for PRM costs has extrapolated the CAGR in usage penetration over the period 2019 to 2025 and applied that across the forecast period. Cost per user has been inflated in line with real pay inflation assumptions.

Taken together, these factors suggest that:

- Total PRM costs will continue to rise in real terms, driven mainly by increasing usage;
- Average cost per user is likely to continue to track payroll inflation, rather than diverge materially from it; and
- The overall PRM cost base will become an increasingly important and enduring element of airport operating costs.

9.2.3.4. Conclusion

Dublin Airport's experience is consistent with wider European trends and reflects structural, not cyclical, change. The combination of rising PRM usage and labour-driven cost inflation has fundamentally reset the PRM cost baseline relative to 2019.

Looking forward, PRM costs are expected to continue growing steadily rather than episodically, with demand growth playing a larger role than unit cost escalation. This reinforces the importance of continued focus on efficiency, workforce planning, and transparent cost recovery, while recognising that PRM services are an essential and expanding component of modern airport operations.

9.2.4. Staff Mobility

Sustained passenger growth, combined with minimal expansion in staff car parking capacity across the wider airport employment ecosystem, requires Dublin Airport to actively manage staff travel demand through alternative mobility solutions. Without intervention, increasing reliance on private vehicles would place pressure on finite car-parking capacity, create operational risk and undermine the efficient use of airport land and infrastructure.

The forecast therefore includes provision for the introduction of targeted staff mobility incentives, at an estimated cost of [REDACTED] which have the potential to release up to 2,000 car-parking spaces for operational and commercial use. These measures are intended to encourage modal shift away from private car usage and support reliable staff access to the campus as employment levels grow. While the forecast reflects a specific incentive-based option, a range of potential measures may be deployed over time, including the provision of

underpass, further operational activity will be displaced into areas such as the West Apron, which will require additional airside operational resources to manage aircraft movements, interfaces with construction zones and associated safety risks.

The incremental cost associated with airfield congestion has been assessed by comparing the forecast resource requirement against a counterfactual “normal operations” scenario based on a 0.4 passenger elasticity assumption. The resulting differential reflects the additional staffing and operational intensity required to safely manage aircraft operations in a highly constrained and construction-impacted airfield environment, rather than inefficiency in underlying airside operations.

9.2.5.2. Facilities & Cleaning staff

The Facilities & Cleaning forecast methodology is set out in section 9.2.2.

9.2.5.3. Facilities & Cleaning Non-pay costs

Maintaining current cleaning service quality in an increasingly congested terminal environment will require additional resourcing. Higher passenger density increases the frequency and intensity of cleaning interventions, including more rapid toilet turnaround, increased litter collection and more active monitoring of high-use areas. In 2023, Dublin Airport increased the [REDACTED] in order to improve performance from 8.0 to 8.5 SQM, demonstrating the cost sensitivity of service quality outcomes. However, even with this additional spend the “cleanliness of washrooms” baseline target remains particularly challenging to attain. As detailed in chapter 12 of the Regulatory Proposition, a target of 8.0 maintains a high standard of cleanliness while allowing for variation in passenger perception and peak-period demand. Challenging targets are beneficial in many cases, but in relation to the cleanliness of toilets metric, considering the growing passenger volumes and strained capacity, it is not aiding the passenger’s experience.

The forecast includes two further step changes, in 2027 and 2030, to sustain this performance level as congestion intensifies (but at a credible service quality metric target rating), reflecting the additional effort required to maintain standards rather than any change in service ambition.

Other costs

The congestion element of “Other costs” relates to the staff mobility costs set out in section 9.2.4.

Other staff costs and IT & Technology

Other staff-related costs and IT & Technology expenditure move in line with changes in Airside Operations and Facilities & Cleaning FTEs, reflecting their treatment as driven costs within the forecast model. As frontline staffing levels increase, there is a corresponding and unavoidable uplift in training, staff welfare and occupational support costs, alongside additional IT infrastructure, licences and end-user equipment required to support a larger operational workforce.

9.3. Efficiency Commitments

Dublin Airport’s Opex forecast includes a defined and deliverable set of efficiency commitments designed to protect affordability for users while maintaining safe, resilient operations in a capacity-constrained environment.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]
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[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Across the wider workforce, FTEs per passenger are influenced by both structural changes to processing requirements and the additional staffing intensity required to manage persistent congestion within the terminals. In particular, changes to VCP processing and the need for active intervention to manage congested passenger flows increase baseline resourcing requirements relative to simple volume-driven assumptions. The table below illustrates FTE efficiency outcomes (excluding additional VCP resourcing) with and without the impact of resilience and congestion factors. Even after allowing for these pressures, Dublin Airport’s opex proposition demonstrates a 3% improvement in FTE efficiency, evidencing that the proposed cost base continues to deliver productivity gains while accommodating higher operational complexity.

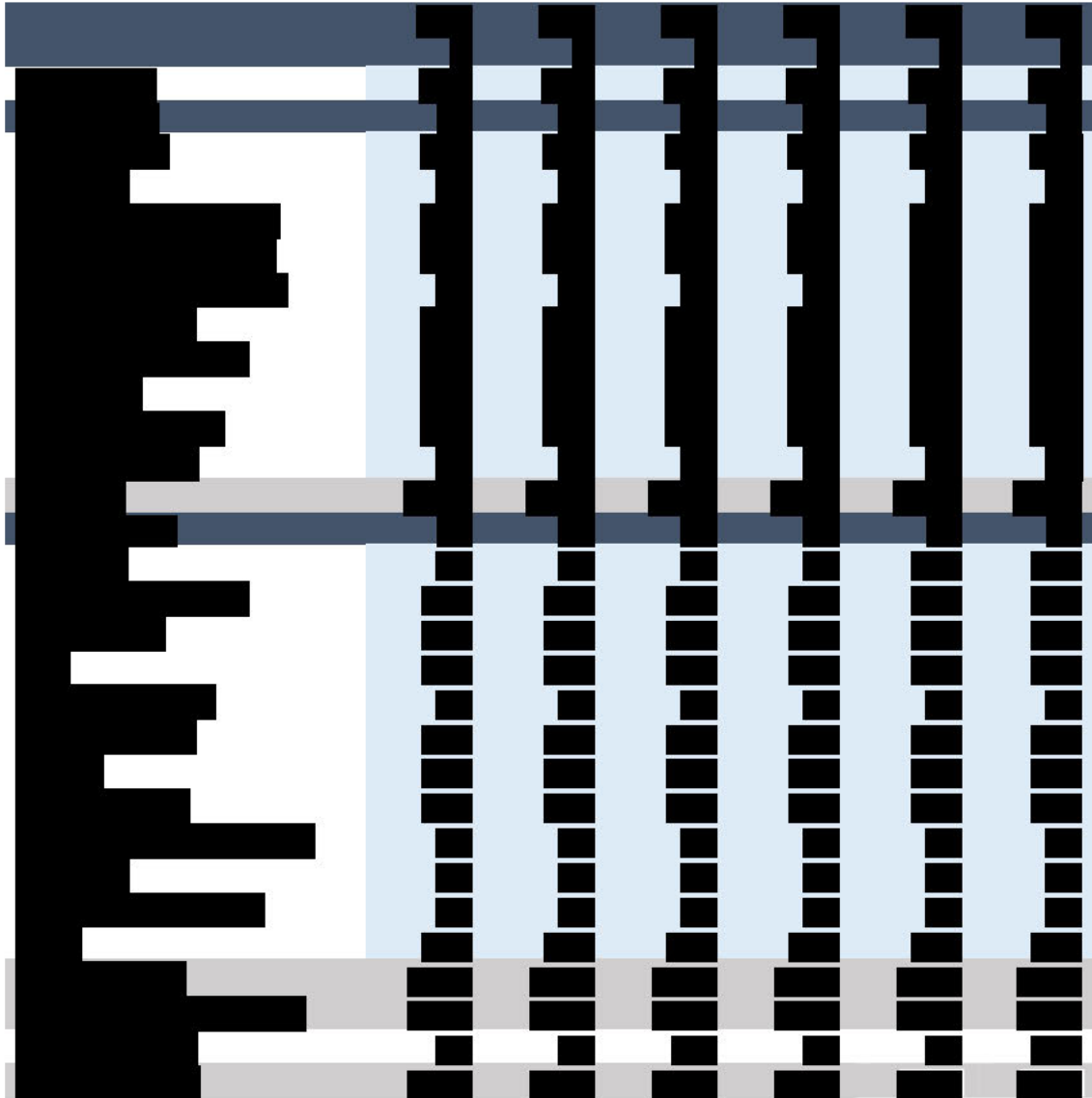
FTE / pax (excluding								
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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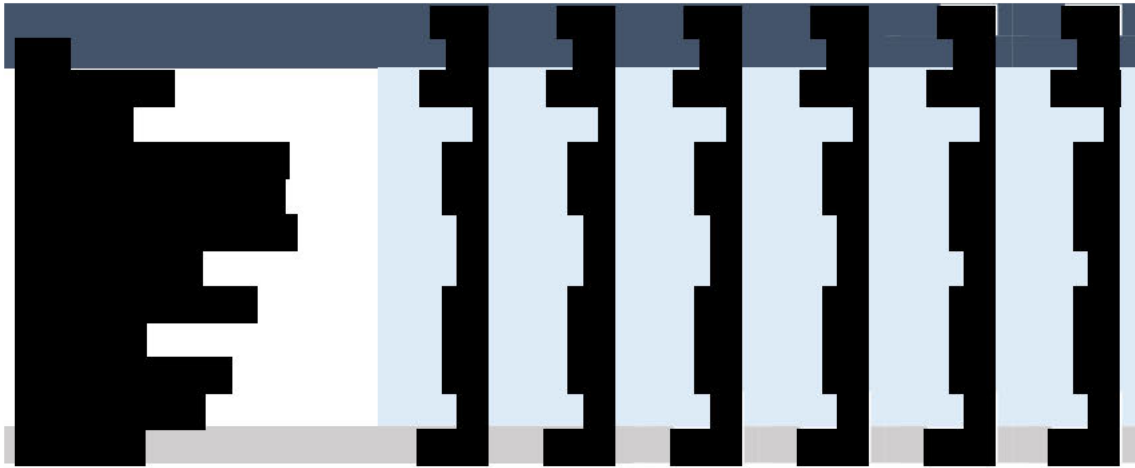
Finally, non-pay costs per passenger are held broadly constant while the airport delivers approximately [REDACTED], accommodates increased PRM usage, manages an increasingly ageing asset base and a more constrained operating environment, and maintains service standards.

[REDACTED]								
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

9.4. Summary table

The table below sets out the Dublin Airport operating expenditure forecast over the regulatory period, disaggregated across payroll, non-payroll, CIP-related operating costs and associated FTEs. It illustrates how the overall opex profile evolves from the 2026 baseline, reflecting the combined effects of passenger growth, operational complexity, asset expansion and targeted resilience measures, while maintaining a clear distinction between core operating costs and incremental obligations arising from capital investment.





10. Conclusion

10.1. Summary of cost, efficiency and benefits

This Operating Expenditure Proposition sets out a transparent, proportionate and efficiency-tested framework for funding the operation of Dublin Airport over the 2027–2031 regulatory period. It is explicitly anchored to a proven and stretched 2026 cost base, reflecting a position in which significant efficiencies have already been delivered and operational change absorbed, rather than a transitional or steady-state benchmark.

The proposition demonstrates that forecast movements in operating expenditure are incremental and justified, arising primarily from unavoidable external drivers. These include sustained passenger growth in a constrained operating environment, congestion-related increases in operational complexity, the scale and age profile of the asset base, ongoing construction activity, regulatory and security requirements, and labour market pressures. The forecast does not rely on structural expansion of the operating model and clearly distinguishes baseline operating costs from incremental obligations associated with capital investment and regulatory change.

Throughout the document, Dublin Airport has set out how operating expenditure supports the delivery of safe, secure and resilient airport operations while maintaining service quality in increasingly challenging conditions. The proposed opex framework enables the airport to accommodate material passenger growth within an already congested system, manage the operational impacts of extensive construction activity, and maintain passenger satisfaction outcomes. At the same time, it supports continued improvements in operational performance, including enhanced security outcomes following the completion of C3 implementation.

The proposition also reflects a disciplined approach to efficiency. Historic efficiency delivery is evidenced, efficiency is embedded within the 2026 baseline, and future efficiency improvements are incorporated where operationally achievable. Where further reductions in unit costs are constrained by physical, safety or service quality considerations, this is transparently explained. This ensures that the assessment of efficient costs appropriately distinguishes between underlying efficiency and the incremental costs required to operate a complex and capacity-constrained airport system.

In parallel, the operating framework underpins sustained commercial revenue growth, which under the single-till regulatory model directly benefits passengers and airlines by reducing pressure on aeronautical charges. The opex proposition therefore supports both operational resilience and economic efficiency, consistent with the IAA's statutory objectives.

Taken together, the Operating Expenditure Proposition provides assurance that the level of operating expenditure proposed for the 2027–2031 period is necessary, efficient and proportionate, and that it will enable Dublin Airport to continue to deliver safe, reliable and high-quality airport services in the long-term interests of users.