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Dublin Airport Aeronautical Charges and Incentives

30 Mar 2025 – 28 Mar 2026

**Decision**

17 December 2024

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## Contents

1	Introduction and Consultation Programme .....	1
1.1	Introduction.....	1
1.2	Overview of the 2025 Charges Consultation Process .....	1
2	2025 Aeronautical Charges.....	3
2.1	Pricing.....	3
2.2	2025 Incentive Schemes.....	4
3	Summary of Stage 3 Consultation Responses .....	5
3.1	Runway Movement Charge.....	5
3.2	Noise.....	5
3.3	PRM .....	6
3.4	Fast track .....	8
3.5	Other comments from Airport Users .....	10
3.6	Consultation Process .....	10
4	Competitive Charges .....	12
4.1	Airport Charges Benchmark .....	12
5	Conclusion .....	13
5.1	Conclusion .....	13

## Tables

Table 1: 2025 Consultation Process.....	1
Table 2: Aeronautical Charges for 2025 .....	3
Table 3: Noise Charges.....	4
Table 4. PRM notification rates .....	7
Table 5. Fast track wholesale revenue forecast .....	8
Table 6. Proposals, User feedback & Decision .....	11

## Figures

Figure 1. Turnaround Charge .....	6
Figure 2. Airport Charges Index .....	12

# 1 Introduction and Consultation Programme

## 1.1 Introduction

- 1.1.1. Dublin Airport is the only Irish airport currently subject to economic regulation by the Irish Aviation Authority (“IAA”). In determining our airport charges our aim is to be transparent, objective & relevant while following sound economic principles.
- 1.1.2. This paper sets out daa’s decision for the level of 2025 airport charges following the consultation process which began in October 2024 after 3 stages of consultation.
- 1.1.3. The process of engagement between daa and airport users setting the 2025 airport charges at Dublin Airport, was undertaken in accordance with the *European Communities (Dublin Airport Charges) Regulations 2011*<sup>1</sup>.
- 1.1.4. Dublin Airport’s pricing decision is in compliance with the expected 2025 price cap, as outlined in the Final Decision on an Interim Review of the 2019 Determination in relation to 2023 – 2026<sup>2</sup>, which was published on 23<sup>rd</sup> December 2022.

## 1.2 Overview of the 2025 Charges Consultation Process

- 1.2.1. The table below sets out the consultation process Dublin Airport adhered to in arriving at the 2025 airport charges decision.

Table 1: 2025 Consultation Process

Date	Step	Deliverable
3 Oct.	First Consultation Document Issued	The consultation document outlined the proposed airport charges for 2025 and set out a range of information, including airport costs, revenues, capital plan update and charging methodology.
18 Oct.	Response Deadline	Airport users were requested to provide written response by COB 18 <sup>th</sup> October 2024.
25 Oct.	Second proposal Issued	Following airport user feedback, a second proposal was issued prior to the consultation meeting.
30 Oct.	Consultation Meeting	The consultation meeting was held both in-person and virtually, in which daa presented pricing proposals for 2025.

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

<sup>2</sup> [Final Decision 2022\\_23Dec\(2\).pdf \(aviationreg.ie\)](#)

Date	Step	Deliverable
31 Oct.	Minutes & Clarification questions issued	daa issued the minutes from the 2025 Airport Charges Consultation Meeting and provided further information in response to clarification questions.
13 Nov.	Response Deadline	daa received 10 airport user responses to the second proposal.
25 Nov.	Third proposal issued	Due to legal developments on the S25 slot coordination parameters, daa issued a third proposal to reflect a scenario of higher passenger numbers in 2025.
4 Dec.	Response Deadline	
17 Dec.	Decision on 2025 Airport Charges, Incentives and Terms & Conditions	This document completes the annual charges consultation held under the provisions of S.I. 116/2011.

## 2 2025 Aeronautical Charges

### 2.1 Pricing

2.1.1 The following table sets out the Aeronautical Charges for the Summer 2025 and Winter 2025/26 seasons:

Table 2: Aeronautical Charges for 2025

	Dublin Charge Basis	Charges to come into effect from Summer 2025		
		Summer	Winter	
Passenger Charge per Departing Passenger	Period			
	Departure on a Contact Stand	12.70	9.10	
	Departure on a Remote Stand	6.15	3.25	
	Departure on a Satellite	11.50	7.90	
	Transfer Passengers	Contact	3.80	2.75
		Remote	1.85	1.00
Satellite		3.45	2.35	
Runway Movement Charge / tonne	Period			
	Per tonne of MTOW	5.00	2.50	
Aircraft Parking (Per 15 minutes or part thereof, except "Long Term Remote" which is per day or part thereof)	Wide/Contact	44.40		
	Narrow/Contact	35.80		
	Wide/Remote	12.30		
	Narrow/Remote	9.80		
	Wide/ Satellite	42.00		
	Narrow/ Satellite	32.90		
	Light Aircraft Parking Areas	3.50		
	Long Term Remote	234.50		
Airbridge Use	Per 15 minutes or part thereof	9.30		
PRM Charge <sup>3</sup>	<70% pre-notified	0.90		
	70%-80%	0.85		
	>80%	0.74		
Fast-Track Charge	Per Fast-Track Passenger	0.82		

<sup>3</sup> For cost-breakdown, please refer to the [Stage 3 consultation document](#) issued 25 November. Prenotification data from the previous month will determine the PRM charge. Invoices will issue in arrears each month.

Table 3: Noise Charges

Noise Charges		
QC	Set fee per Movement 2025 Day	Set fee per Movement 2025 Night
0	€0	€0
0.125	€0	€0
0.25	€0	€0
0.5	€0	€150
1	€300	€600
2	€400	€800
4	€500	€1000
8	€600	€1200
16	€700	€1400

\*Following airport user feedback, noise charges are now levied at a set fee per movement. Please refer to section 3.2

\*\*For more information on QC assignments & the definition of night/day please refer to the 2025 Terms & Conditions of Use in relation to Airport Charges

## 2.2 2025 Incentive Schemes

2.2.1 The following incentive schemes will be suspended until further notice:

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

2.2.2 The Low Emissions Aircraft Discount (LEAD) scheme will be removed from the start of the Summer 2025 season.

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

2.2.4 Dublin Airport fully intend to reintroduce the New Route Support Schemes (Long and Short Haul RSS) in their current forms when the Infrastructure Application (IA) is approved by Fingal County Council and the 32mppa terminal cap is amended. We envisage that any new routes that may have commenced in the interim, will be eligible for access to the relevant year of the schemes once reintroduced (considering all criteria of the schemes are still achieved).

## 3 Summary of Stage 3 Consultation Responses

### 3.1 Runway Movement Charge

3.1.1 Users 1-5 disagreed with the proposal to remove banded runway charges and resort to a single fee per tonne of MTOW. User 1 suggested that daa did not conduct transparent consultation process by proposing “narrowly defined” options for the 2025 runway movement charge. User 1 however welcomed the reduction in the winter rate. User 7 acknowledged the removal of the banded runway charge, which addresses an IAA Decision<sup>4</sup>.

3.1.2 daa wish to clarify comments made by User 1 in relation to the Runway Movement charge and the broader consultation process.

- As part of Stage 1, daa proposed 3 options with seasonality removed and asked airport users to provide a preferred option:

User 1 did not directly respond to this question but instead produced text insisting that MTOW banding should be retained. Following a review, daa could not effectively justify its retention under the 2011 Regulations<sup>5</sup>. The suggestion that banded runway charges are “commonly adopted” across European airports is false.

- In daa’s second proposal, a single set fee per tonne of MTOW was chosen as the preferred option with seasonality retained:

In their response to Stage 2, User 1 welcomed seasonality being retained while raising concerns over the winter rate increasing. User 1 again produced text as to why banded runway charges should be retained, despite this not being a proposal by daa and explicitly noting the difficulties in justifying this differentiation under the 2011 Regulations.

- In daa’s third proposal, the summer rate was reduced, and a recalibration of the winter rate also made in response to comments made by User 1.

### 3.2 Noise

3.2.1 Users 1-5 accept that noise charges at Dublin Airport are relevant and transparent, however they state that they are not objectively justified and do not achieve the intended purpose.

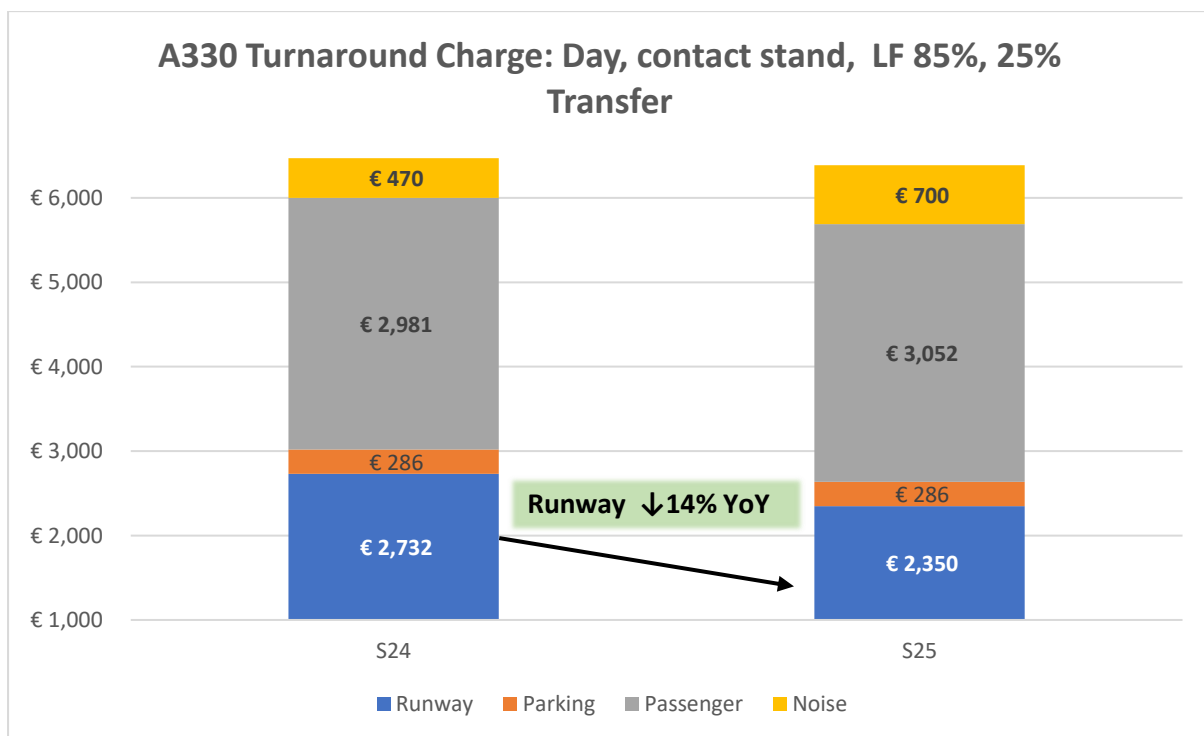
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<sup>4</sup> IAA Final [Decision](#) on Ryanair Complaint on Airport Charges at Dublin Airport, 3 September 2024.

<sup>5</sup> S.I. No. 116/2011 European Communities (Dublin Airport Charges) Regulations 2011.

- 3.2.2 User 11 outlined that while it understands Dublin Airports obligations in relation to noise, it deems the increases as aggressive.
- 3.2.3 User 1 argues that for the same level of noise, a heavier aircraft will pay more given the structure of noise charges being based on QC and levied at a rate per tonne of MTOW.
- 3.2.4 Following a review of the consultation responses made by users 1-5 & 11, daa is amending the approach to noise rates to reflect User views, whereby noise charges are no longer driven by MTOW. Daa recognises that an aircraft with equal noise emissions should have the same cost allocation, regardless of aircraft weight. As a result, a set charge per movement will be levied. The set fee per movement was derived using the same level of aeronautical revenue allocated to noise charges and the average charge for each QC in the previous structure.
- 3.2.5 daa would like to highlight that in the case of heavier aircraft, while noise charges have increased, the turnaround charge has decreased marginally. This is demonstrated graphically in Figure 1 below.

Figure 1. Turnaround Charge



### 3.3 PRM

- 3.3.1 Users 1-4 were the only users to respond to the PRM charge in Stage 3 of the consultation. They argued that the rates are unattainable with Users 3 and 4 stating



the flat charge of €0.74 should be applied. User 2 asked how many passengers daa believes will fall into each category.

- 3.3.2 daa views the claims of User’s 1-4 as repetitive and duplicitous, as in their responses to Stage 3 they provided no new reasoning as to why they believe the rates are unachievable, therefore daa’s responses in paragraphs 4.5.7 – 4.5.9 of Stage 3 of the consultation document<sup>6</sup> remain unchanged. In the interest of transparency daa has outlined the justification below.
- 3.3.3 Table 4 outlines for 2024, airlines that achieve 70-80% pre-notification make up 44% share of total PRM passengers. daa believes that the bands applied provide an adequate behavioural incentive to increase the pre-notification rate and subsequent operational performance. This adequately discharges the objective obligations of the charge application.

Table 4. PRM notification rates

Pre-advised rate	Pre-advised Pax	Non-advised Pax	% of total pax	Number of airlines
<60%	1,226	4,228	14%	31
60-70%	10,632	5,111	42%	9
70-80%	12,111	4,353	44%	8
>80%	0	0	0%	0
Total	23,969	13,691	100%	48

- 3.3.4 Under TF 2018 and ACD Article 10 airport charges differentiation to promote behavioural efficiency is justified. User 1 claims that Table 4 demonstrates that lower levels of pre-notification would be more beneficial. However, the objective of the PRM rate banding is to maximise pre-notification and not to reward inferior performance.
- 3.3.5 The average prenotification rate per month is 64%. To incentivise behavioural efficiency the rate must be higher to achieve an increase in prenotification rates through behavioural incentives. daa therefore does not deem Users 1-4 objections to the bands as relevant nor objective.
- 3.3.6 Under (EC) No 1107/2006<sup>7</sup> the airport managing body can levy a PRM charge to fund the provision of PRM assistance and it must be cost related. In Paragraphs 2.2.6 & 4.5.5 of Stage 3, daa outlined why due to the propensity to use the service has increased, the cost of provision has also increased. Therefore, a flat charge of €0.74 would lead to a cost under recovery.

<sup>6</sup> [https://www.dublinairport.com/docs/default-source/corporate/2024-11-25-2025-airport-charges-consultation-stage-3-v1-0-\(1\).pdf](https://www.dublinairport.com/docs/default-source/corporate/2024-11-25-2025-airport-charges-consultation-stage-3-v1-0-(1).pdf)

<sup>7</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32006R1107>

3.3.7 In Table 12 of Stage 3, daa showed which bands airlines currently achieve and refer User 2 to same.

### 3.4 Fast track

3.4.1 Users 1-5 were the only Airport users to respond on Fast track in Stage 3 of the Consultation. Users 1-5 oppose the clarification of the Fast track Terms and Conditions to ensure full transparency.

3.4.2 User 1 claims that daa has changed the approach to the regulated charge by limiting the cost related charge to business and first-class passengers. User 1 also claims that daa is taking advantage of its dominant market power.

3.4.3 User 2 claimed that this clarification to Fast track T&Cs undermines fairness and transparency. User 2 further alleges that daa is increasing its advertising of Fast track means there are no efficiency issues and that according to User 2 airlines have not brought up capacity constraints at Fast track. Users 2 and 5 also requested revenue forecasts and passenger forecasts based of the clarified T&Cs, refer to Table 5 below.

Table 5. Fast track wholesale revenue forecast

	2024	2025	2025
		33.4m Scenario	34.7m Scenario
Departing Passenger (Point to Point)	16.4	15.8	16.4
FT Users ('m)	1.35	1.26	1.31
Penetration (%)	8.2%	8.0%	8.0%
<b>FT Wholesale Revenue (€'m)</b>	<b>1.08</b>	<b>1.03</b>	<b>1.07</b>

3.4.4 Lastly, Users 2 and 5 argue daa is looking to commercialise a regulated charge and alleges daa is pushing additional unknown charges onto carriers who rely on the consistent and equitable application of regulated services. User 3 asked for clarification on charges that will apply to different fare classes for Fast Track.

3.4.5 daa rejects User 1's claim that daa is changing the approach to a regulated charge. In Stages 2 and 3 of the consultation daa outlined that the wholesale charge when initially introduced as consulted was only for first and business class passengers. Due to a lack of clarity in the Terms and Conditions certain airlines have been allowing non-business class passengers utilise the Fast track lanes. As part of the 2024 Airport Charges Consultation process, daa provided advance notice on its intention to clarify the Terms and Conditions of Fast track starting from 2025. daa therefore disputes User 1's claim it is significantly changing the approach to a regulated charge by limiting the cost related charge to business and first-class passengers. daa has further explained in Stages 2 and 3 of the 2025 Consultation Process that the Fast track wholesale charge was never designed for frequent fliers.

3.4.6 daa also notes that Dublin Airport is subject to a single till structure, the most restrictive form of regulation on an airports aeronautical charging structure. As a result, daa does not have dominant market power as User 1 suggests. daa again

highlights that clarity must be added to the Fast track T&C's as to who is eligible, daa again reiterates paragraph 5.2.5 in Stage 3 of the Consultation Document:

*Any commercial agreements for Fast Track access to all fare classes would involve retail sales to passengers (not airlines) and thus could not be subject to airport charges regulation and would benefit from equivalent protections because of Dublin Airport's commitment to equal treatment and transparency. We note that User 1 has not considered the proposal from the perspective of either (i) passengers who are not members of its frequent flyer programmes or (ii) airlines which do not have frequent flyer programmes for which they would like to obtain wholesale access.*

- 3.4.7 User 2 has misunderstood daa's response in paragraph 5.2.6 in the Stage 3 Consultation Document where User 2 claims that daa has tried to justify its proposal on the basis that too many passengers are currently using the service. daa note that it said the following:

*daa reject the suggestion that there is a conflict between the Fast Track proposal and the commercial strategy to promote Dublin Airport as a hub. The hub strategy requires that Fast Track quality of service / wait times, and the integrity and equality of the wholesale offering, be regularly checked and protected, which is inconsistent with having it available to various frequent flier groups who do not pay a fare premium compared to non-frequent fliers.*

- 3.4.8 daa again clarifies that by continuing to allow wholesale access to Fast track for frequent fliers, the Terms and Conditions results in non-premium fare paying customers gaining access to a premium service, which subsequently can have negative impacts on service quality and wait times. User 2 and 5's comments that this condition imposes unpredictable costs is not valid. daa notes that Directive 2009/12/EC<sup>8</sup> defines aeronautical revenue as the amount an airport earns through the supply of airport infrastructure needed for the provision of air passengers and cargo services to airlines. User 2 does not need wholesale Fast track access for its frequent fliers to use the airport facility and therefore this is not imposing an unpredictability in the costs to airlines. Its frequent fliers can still pass through the terminal without using Fast Track and would lead to cost savings for its users.

- 3.4.9 Furthermore, daa provided c. 18 months' notice of this update to the T&C's. daa therefore does not deem User 2 and 5's claim of unpredictable costs as relevant. daa reiterates that it is not amending the current regulatory treatment of the regulated wholesale Fast track charge, instead it is clarifying the T&C's for the sake of maximum transparency and equitable access of a service whereby the wholesale Fast track charge is intended to apply to premium fare paying customers.

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<sup>8</sup> [ACD](#)

### 3.5 Other comments from Airport Users

- 3.5.1 User 1 outlined that they were not expecting the Stage 3 Consultation claiming it was not communicated in advance and that the purpose of this consultation was not clear.
- 3.5.2 User 7 is of the view that daa's airport charges complies with the European Communities (Dublin Airport Charges) Regulation of 2011 and the IAA's Final Decision on Ryanair's complaint of 15<sup>th</sup> of December 2023.
- 3.5.3 User 1 welcomed the transfer charge discount was now being applied to satellite and remote stands.
- 3.5.4 User 1 requested that following the reinstatement of new route incentive schemes, there should be a mechanism to backdate such schemes for new routes.
- 3.5.5 daa outlined in the Consultation Meeting and throughout (Section 2.1 of the second proposal issued 25 October), that a revised proposal will be issued if there were material developments in the various legal actions taken against slot coordination parameters at Dublin Airport.
- 3.5.6 Regarding User 1's comments on incentive schemes, please refer to paragraph 2.2.4

### 3.6 Consultation Process

- 3.6.1 daa is of the view that it has fully discharged the necessary compliance obligations under the 2011 Regulations. This has been achieved by following a lengthy consultation process, providing direct questions to airport users in order to aid the structure of airport charges at Dublin Airport while making necessary remedies in light of the IAA's Final Decision on Ryanair's complaint on 2024 Charges.
- 3.6.2 Table 4 is a non-exhaustive summary of proposals made by daa, airport user feedback & daa's subsequent decision. This demonstrates that airport user views were considered in formulating the structure of airport charges, in addition to remedying the Ryanair complaint in accordance with the associated IAA Decision.

Table 6. Proposals, User feedback & Decision

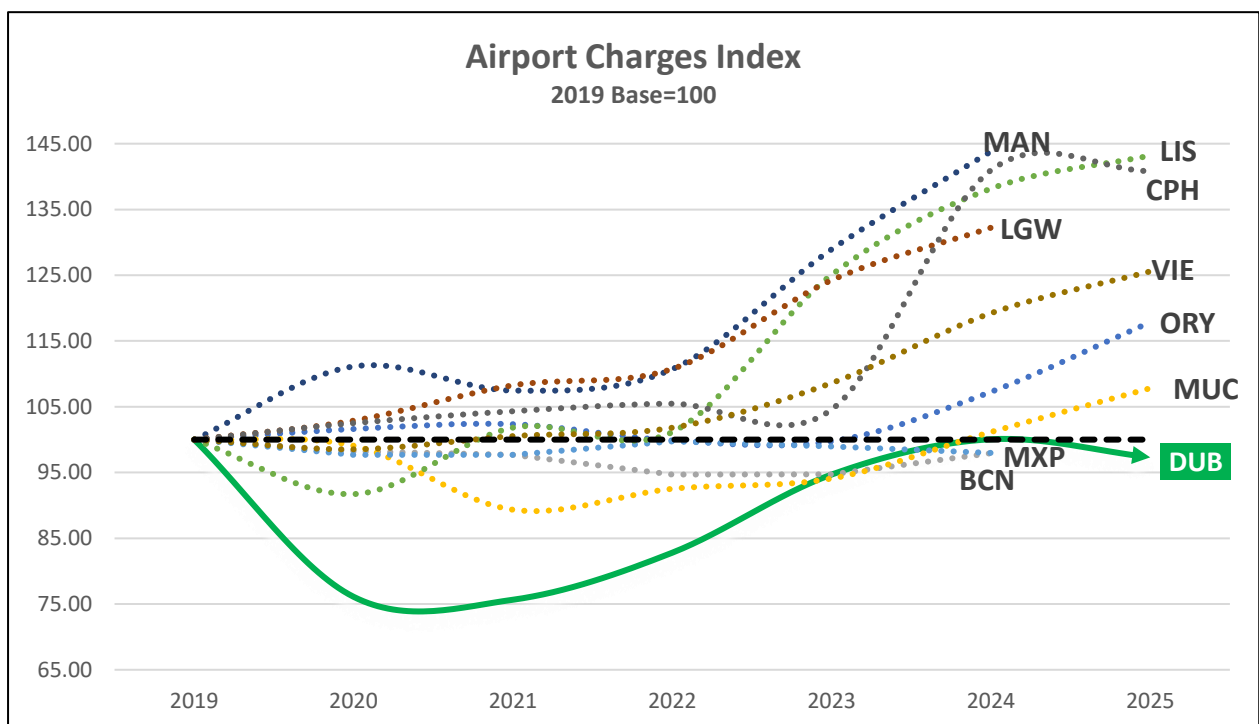
Charge	daa proposal	Airport User feedback	daa Decision
Transfer passenger	<ol style="list-style-type: none"> <li>50% cost differential between transfer and local departing passengers provided by cost model.</li> <li>Airport users asked what level of discount for secondary criteria.</li> </ol>	<ol style="list-style-type: none"> <li>User responses varied from no discount to maintain 2024 level of discount (c. 80%).</li> <li>Users also requested that the discount be applied to contact, satellite &amp; remote passenger service charge rates.</li> </ol>	<ol style="list-style-type: none"> <li>70% discount.</li> <li>Applied to contact, satellite &amp; remote rates.</li> </ol>
Runway Movement	<ol style="list-style-type: none"> <li>3 Runway charge options:               <ol style="list-style-type: none"> <li>Single rate per tonne of MTOW</li> <li>Noise Modulated</li> <li>Noise / NOx modulated</li> </ol> </li> <li>Seasonality Removed</li> </ol>	<ol style="list-style-type: none"> <li>Majority of users not in favour of option ii. &amp; iii. Preferred option single rate per tonne.</li> <li>Seasonality retained</li> </ol>	<ol style="list-style-type: none"> <li>Single rate per tonne of MTOW.</li> <li>Seasonality retained.</li> <li>Both Summer/Winter rates decreased by 5% vs. S2 proposal</li> </ol>
Noise	<ol style="list-style-type: none"> <li>Double noise charges for existing QC bands.</li> </ol>	<ol style="list-style-type: none"> <li>Aggressive increase over a short period.</li> <li>Better instruments to differentiate i.e. Noise chapters.</li> </ol>	<ol style="list-style-type: none"> <li>No longer derived by MTOW, now a set fee per movement.</li> </ol>
LEAD	<ol style="list-style-type: none"> <li>Retain amended scheme</li> </ol>	<ol style="list-style-type: none"> <li>Retainment strongly opposed</li> </ol>	<ol style="list-style-type: none"> <li>Removed from S25</li> </ol>
NOx	<ol style="list-style-type: none"> <li>Retain</li> </ol>		
PRM	<ol style="list-style-type: none"> <li>Banded charge based on pre-advised rate</li> <li>Users asked for appropriate target for a discounted charge</li> </ol>	<ol style="list-style-type: none"> <li>65% pre-advised rate only target provided</li> </ol>	<ol style="list-style-type: none"> <li>3 bands implemented:               <ul style="list-style-type: none"> <li>&lt;70%</li> <li>70-80%</li> <li>&gt;80%</li> </ul> </li> </ol>
Growth Incentives	<ol style="list-style-type: none"> <li>Suspended due to planning conditions.</li> </ol>	<ol style="list-style-type: none"> <li>Limited feedback</li> <li>Backdated for new routes during the period of suspension</li> </ol>	<ol style="list-style-type: none"> <li>Will be reintroduced once 32mppa cap lifted.</li> <li>New routes commenced during the period of suspension will be placed on the relevant level of discount once 32mppa lifted.</li> </ol>

## 4 Competitive Charges

### 4.1 Airport Charges Benchmark

- 4.1.1 To demonstrate Dublin's competitiveness when compared to EU peer airports of similar size & scale, daa have indexed airport charges data in a time series outlined in Figure 2.
- 4.1.2 The index showcases the year-on-year percentage change from 2019 to 2025.
- 4.1.3 Airport charges for a Boeing 737-800 turnaround in a Summer season were used. Other assumptions include a load factor of 85%, 78 tonne MTOW and a parking period of 30 minutes.
- 4.1.4 As seen below, Dublin has only recovered to 2019 airport charging levels in 2024, with the charge reductions in 2025 bringing the DUB index back below 2019 levels.

Figure 2. Airport Charges Index



Source: RDC Aviation

## 5 Conclusion

### 5.1 Conclusion

- 5.1.1. Dublin Airport is committed to optimising the provision of our services in a sustainable and economically viable way. We will continue to monitor all aeronautical charges while delivering the necessary infrastructure for airlines and best in class passenger service.
- 5.1.2. daa would like to thank all airport users and the IAA for participating in this consultation process.