



Irish Air Line Pilots' Association

Woodford Business Park
Santry, Dublin 17, Ireland
E-mail: admin@ialpa.net
Website: www.ialpa.net

Dr Adrian Corcoran
Commission for Aviation Regulation.
Alexandra House
Earlsfort Terrace
Dublin 2
D02 W773

05 July 2019

Ref: Response to the 2019 Draft Determination CP3/2019.

1.0 Introduction:

IALPA welcomes the opportunity to comment on Commission paper 3/2019 in relation to the “Maximum Level of airport Charges at Dublin Airport” for the period 2020 – 2024.

The Commission received five responses to its issues paper and, given the CAR acknowledged DAA improved pre-consultation process (excluding IALPA*), we expect an overall reduction from the 33 responses to the 2014 Draft determination.

* IALPA received a DAA CIP briefing (Jan 2019) following their previous CIP submission of Nov 2018.

Our submission shall summarize the current situation in relation to:

- 1.1 CIP Overview and Accountability
- 1.2 The 2014 - 2019 determination.
- 1.3 The intervening period 2014 -2019.
- 1.4 IALPA Overview of the DAA 2020 – 2024 CIP document.
- 1.5 Dublin Airport Development.
- 1.6 Stakeholder positions?
- 1.7 IALPA S&T's role in relation to determinations.
- 1.8 Annex A - Brief comments in relation to the certain Draft CAR approved CIP projects.

1.1 CIP Overview and Accountability

CAR's Draft Determination (1.21) sanctioned a “Capital investment at just over €2bn including the remaining PACE projects” and at 9.48 the “Scale of Proposed Capital investment would see over €1m in Capex being spent in each day of the 5-year period”.

This, we note excludes, the cost of the new Northern Runway, previously covered in the 2014 Determination for which the DAA declined a 2017 CAR offer to review said costings.

Excluding two projects, CAR's full funding of the 2020 – 2024 CIP can be seen as a resounding approval of the DAA's proposed development of the Airport. Alternatively, the CAR may not wish to be seen as restricting expansion by placing absolutely no supervisory guidance or oversight on the Masterplan but merely acting (in consultation with an IFS) as a *de facto* external independent Quantity Surveyor / Cost controller.

The CEPA report on State Airports put this proposed 2020-2024 CIP development period at a crossroads. We have yet to witness either a direction from Government or a DAA roadmap as to how the Airport will develop Land and Airside facilities beyond this CIP 40mppa barrier. We therefore foresee nugatory expenditure within the €2bn on assets that shall not cover CAR's expected lifespan.

Public Accountability

The National Children Hospital (NCH) saga exposed a systemic failure to present (at a Dail Public accounts Committee), an accountable manager willing to accept ultimate responsibility for the Capital expenditure overrun.

Therefore, whilst acknowledging that the DAA is a commercial semi state body, and in order to avoid a repeat of past NCH oversight failings, we deem it appropriate (that for a €2bn passenger CIP expenditure) CAR's first priority is to devise (in conjunction with the DAA) a transparent system of managerial accountability / in the construct of the Stagegate CIP projects.

IALPA welcome the Steer Report of June 2019 in relation to Stagegate and we consider it prudent and appropriate that there be a requirement for a DAA Accountable Manager to sign off each phase of work. This should be fully transparent. Why? The CAR is acutely aware of past reactive development projects which are demanded by Airlines and undertaken by the DAA. CAR is correct not to allow dubious expenditure to enter the RAB, however, CAR is noticeably silent on the accountability of monies that would be squandered were the DAA to proceed with certain South Apron (SA) CIP projects.

{In order to protect past funding our airside plan proposes that Tri-angle operations be moved to SA Phase 1 on completion of our Western Satellite Pier 5 alongside a redeveloped Pier 2 predominately for Ryanair operations.}

We therefore see no reason why a confident DAA executive management team would be unwilling to accept a transparent accountable sign off to Stagegate CIP projects. A failure of the DAA to accept such a transparent accountable system is indicative of a lack of confidence in its masterplan.

1.2 The 2014 – 2019 Determination:

In Aug 2014, having become aware of threats to the overall long-term safety of aircraft operations at Dublin Airport, IALPA S&T engaged with the CAR process.

We expressed serious concerns in relation to inadequacies associated with the “2035 Airport Masterplan Vision” expounded by the then DAA CEO in 2010. This “2035 Vision” was subsequently withdrawn by the DAA. For the record, at that time the DAA aspired to eliminate the cross runway at Dublin Airport (Runway 16/34) and to develop a dual only parallel Westerly runway system for Dublin Airport. Presently S&T and the IAA SRD has achieved its 2014 objective in retaining the Operational cross Runway 16/34 thereby ensuring near term Airport resilience. We shall continue to promote the retention and enhancement of the cross-runway capabilities during the proposed CIP.

With the exception of CAR, and despite our exclusion from a consultative process, IALPA S&T will constructively engage, to modify the current DAA Airfield Vision to 50mppa. The 2015 National Aviation Policy sought to develop Dublin Airport as a secondary Hub. This necessitates a requirement to eventually gain access to the DAA acknowledged “non operational / inaccessible” Western Apron.

Being progressive, we had suggested to CAR, as early as 2014 that the DAA should commence tunnelling under Runway 16/34.

We therefore welcome the DAA’s belated acknowledgement of the requirement for same and CAR’s provisionally funding at CIP 20.03.051B which supersedes, and renders obsolete the CAR approved PACE project i.e. West Apron Stands.

Please note IALPA have serious concerns regarding the proposal to use a road crossing of 16/34 as an interim measure to the construction of the tunnel.

1.3 The Intervening Period: 2014 - 2019:

From a DAA planning agents’ perspective, “IALPA is not a prescribed body to the planning process nor a body that the DAA consults as a stakeholder with regards to Dublin Airport operations or procedures”. Indeed, the former DAA Chairman assumed IALPA to be solely a “Trade Union” which CAR knows to be factually incorrect.

Consequently, between determinations, it is regretful that the DAA continues to isolate IALPA S&T despite our offer to constructively engage with the development of the airfield masterplan. The DAA subsequently excluded S&T from the “Local Runway Safety Forum”, the “Northern Runway Project Group”, the PACE review and more recently the formal stakeholders 2020+ CIP consultation process.

Having been denied an opportunity to contribute constructive / guidance within these forums IALPA S&T was left with no recourse but to lodge a Planning appeal to FCC in relation to the scaled down “Northern Runway Project Groups” deliberations. There remains outstanding PACE and certain proposed CIP 2020+ projects which we will keep under review and may in time progress our concerns through the full planning process.

1.4 IALPA Overview of the DAA 2020 – 2024 CIP document.

Our initial Assessment of the challenges to the €2bn 2020 – 2024 DAA CIP programme is.

- Expanding T1/2 passenger processing to 40mppa capacity contradicts the ABP permitted Eastern Campus surface access limit of 32mppa. The DAA SID application to ABP to review said limit remains an overhang to the entire CIP.
- Compressing additional passenger processing to 40mppa within Current Terminal footprints shall ultimately constrain any additional passenger expansion above 40mppa.
- Revenue generating projects, such as short-term Car park expansion may contravene ABP DAC guidance on inner core vehicular limits.
- The T1 Kerbs proposal faces significant overall vehicular and passenger flows challenges to / from Terminal 1 and ultimately the Metrolink station.
- A failure to demolish T1's Spiral Car ramps ultimately thwarts T1 Easterly expansion.
- A Base Carriers Pier 5 design- a segregated "single sided, four storey T2 Pier" is ironically proposed on lands supposedly reserved (by the DAA) for T2 Phase 2. Hence Pier 5 shall also thwart T2's Easterly Terminal expansion. If we err on this statement, we call on the DAA to indicate the proposed design that clearly incorporate both Pier 5 and revised T2 phase 2.
- The original T2 Architects have now dispensed with their initial Phase 2 incremental expansion of T2 and now opt at a base carriers' request, to compress passenger processing into what has now exposed initial poor design. E.g. the present-day inability to install T2 - 25m security screening lines.
- When processed, Terminal 1&2 overflow passengers shall be bussed to Satellite Pre- Boarding Zones (PBZ) on the Northern and Southern Aprons.
- Pier 5 "costing €289m "implies a cost of €96.3m per (NET three) wide body aircraft stand.
- Scattered US CBP screened passengers bussed from a central facility may be incompatible with US Authorities stringent security requirements.
- Piers and apron expansion with enhanced extended Cul-de-sacs shall restrict aircraft movements, eliminate the benefits of the Dual F taxiways design thus compounding overall ATC Ground controller complexity with additional runway capacity. (10L / 28R).
- A May 2019 Section 5 exempt planning application by the DAA relating to the PACE Dual F taxiways highlights the deficiencies of same whereby they don't actually link with the Dual Code E SA bypass proposals. Therefore, the proposed Taxiway system at the head of Pier 4 remains an unmitigated mess and an enhanced critical "Hotspot" in LVP operations.
- A lone Wide bodied Aircraft secondary top up de-ice facility at the RWY 10 bypass serves no practical purpose.
- We question basic IAA & DAA assumptions used in the Helios Airfield modelling. We request, prior to the Final determination, that CAR review same with an offer of joint presentations from the DAA, IAA ANSP, IAA SRD and IALPA-S&T (in the presence of Helios). A failure by the DAA and IAA (ANSP & SRD) not to participate would / should be of concern to CAR.

1.5 Dublin Airport Development:

IALPA S&T acknowledge the tremendous pressure placed upon the DAA by Airlines. Indeed, a recent DAA Board decision to "Suspend" CIP projects due to a lack of alleged insufficient CAR funding approval is a matter of concern. The CAR has endeavoured to improve the Regulatory process with additional proposed "Stagegate" safeguards.

Recent historical trends have unfortunately demonstrated a DAA organisation endeavouring to fulfil the demands of dominant base Carriers. These demands are for the provision of facilities within a short timespan without consideration to future development, These Airlines in 2014, decried any requirement to significantly increase CIP expenditure, yet presently demand facilities to match their sudden expansion opportunities.

This reactive trend shall continue during the 2020 – 2024 CIP period adding little overall long-term value to the Development of Dublin airport, there being no demonstrable visibility on subsequent “Masterplan building blocks” eg Pier 2 & 3 redevelopment.

This continuous reactive development policy merely consolidates the current duopoly / influence enjoyed by Base Carriers whom, if unchecked by CAR, shall continue to have a stranglehold on Eastern Campus infrastructure.

Who controls Dublin Airport Development, the DAA or Base Airlines?

IALPA accepts that the CAR has no responsibility to micromanage the DAA. However there certainly is a responsibility on CAR to ensure domestic and foreign carriers have equal access / rights to CAR funded infrastructure. After all, foreign carriers pay 23% of passenger service charge imposed by the CAR.

We note the role of the CAR is to determine whether CAPEX proposals (as presented by Dublin Airport) are in the interests of current and future users to meet an identified need. CAR also states at 9.88 that “we cannot compel Dublin Airport to deliver any particular project, nor is it our role to provide allowances for alternative projects not proposed by Dublin Airport”.

These simple statements pose fundamental and obvious questions:

- 1) Who, on behalf of passengers has ultimate control /direction to Dublin Airport development? Publicly quoted airlines or the DAA?
- 2) Who (as the CAR declines), shall ultimately determine if the €2bn capital expenditure provided, is indeed for the best long-term development of the airport? The DAA, Airlines, or IATA and industry best practice?

S&T Suggestion:

The Winter 2019 “Co-ordination Committee” document clearly demonstrates the Duopoly that exists at Dublin with IAG affiliated airlines in pole position vis-a-vie voting rights. Indeed a CAPA analysis outlines the control enjoyed by the base carriers.

The June 2019 Steers report (at pie chart Figure 1.1: Airline share of seat capacity at Dublin Airport Summer 2019) indicates Ryanair having 39%, IAG affiliated airlines at 38%, and others at 23%.

We fully respect CAR’s Draft Determinations comments at 9.86 and 9.89 in relation to the “Broader Developments and Masterplan”. However, in reality the Airlines (“Users”) as opposed to the DAA, are effectively controlling how the Airport is developed eg Aer Lingus planned Pier 5. This is not an appropriate or sustainable way to plan an airports development. Individual user concerns effectively lead to a piecemeal approach to airport design rather than a holistic approach in the long-term interests of all airport stakeholders.

This by no means denigrates the highly mobile Airlines who naturally are vital components, providing access and goods to the Country. However, the DAA on behalf of the taxpayers should not be subservient to any particular operator but should promote competition to all markets. Passengers, (who pay the Airport Service charge as opposed to base airline shareholders) interests should therefore be to the fore in any CAR Determination.

For the €2bn CIP expenditure the travelling public might ultimately (in 2024) expect state of the art facilities. However, in reality the results will be passenger processing compaction within existing Terminal footprints combined with widespread disruption during renovations. A fact honestly acknowledged by the DAA in what an enormous project management challenge is, building while keeping the terminals open.

CAR too is sanguine, simply stating at 9.50 “We are of the view that the proposed investment programme is challenging and the proposed delivery schedule ambitious”. In summary, we strongly recommend that IATA (representing at a minimum 23% of passengers) be given a key role within the Stagegate Capital Expenditure process which determines as to whether CIP projects are warranted or a nugatory expenditure.

IATA’s vast experience and Master planning principles should, with respect weigh heavily on the DAA and CAR as to what is indeed beneficial to the best long-term interest of the Airport development, in effect a counterbalance to Dominant Base carriers current pressing requirements.

1.6 Stakeholders positions?

CAR Emphasis on the 2020 CIP.

IALPA is of the view that too much emphasis has been placed on the requirements of Dominant Base Carriers as opposed to the long term DAA requirement.

Whilst there is aggressive competition in the short-haul market there is a present-day requirement for CAR to ensure improved market access to facilities for competing airlines (who’s crews IALPA represents). Indeed, IALPA has a responsibility to ensure home Airport facilities meet the expectations of our International IFALPA colleagues.

A pressing requirement for the DAA is therefore to ensure unfettered access to the TA and Asian Long-haul market for both WB and NBE gauge aircraft. IATA’s involvement as outlined above shall provide counterbalance.

Base Airlines Emphasis on the 2020 CIP.

As a result of the improved bilateral relationship with the newly incumbent DAA CEO, during this 2020 – 2024 CIP period Aer Lingus shall naturally seek to dominate T2 Pier 4, its proposed new Pier 5 and its relocated South Apron PBZ.

Ryanair shall naturally aspire to retain dominance at T1 Pier 1, with associated enhancements to Pier 1 (Module 1), and Pier 2 (in preference to bussing operations to the Northern PBZ). Wide Bodied (WB) aircraft access to Pier 1 shall no doubt be vehemently resisted.

The Real Politic of Base Airline pressure on the DAA is therefore a staunch reluctance to move / share new Infrastructure.

The consequences of this subtle pressure are exemplified by the DAA having to resort to enabling Pier 2 for WB operations - a feature never envisaged by its original designer. With the subsequent loss of the triangle, the consequences of which shall effectively restricts commuter and other carriers' access to any meagre remaining stands on Piers 2, 3 but giving them sole exclusively to the Northern PBZ.

DAA Long Term Core Airfield Development Strategy?

Transient Airline, Regulatory Authorities and DAA Airport management may not necessarily care how Dublin Airport shall function in 2035? The simple answer is they wont actually have to live with the consequences nor be held accountable in retirement for past decisions.

On the contrary, IALPA who's members may have a 40-year career operating from a Dublin Base can at the outset rightly justify and challenge incumbent DAA management as to what is the effective long-term development strategy.

In this context and with the utmost respect to the CAR it is not apparent that long term policy decisions of the DAA are being challenged by CAR. Stagegate does offer limited near-term financial assessment of CIP items however their relationship to an overall Masterplan remains unclear.

Example:

The CAR places significant emphasis on the needs of current base airlines which poses this Question:

What's CAR response if the DAA wished to attract additional global carriers and sought to extend Runway 28L to 3500m?

Given past form the logical reaction from Ryanair would be that its not needed for their operations and should not be funded. Whilst IAG, will naturally protect their Dublin and Heathrow Bases would logically state that the current planned runway length is sufficient.

The corollary for the DAA (due to lack of CAR funding) therefore thwarts the DAA from providing infrastructure that would allow other airlines greater access to global markets "without weight restrictions". We ask that CAR and the DAA reflect on their respective Statutory roles to protect current and future users of the airport and not to focus on the here and now.

We cite this example as we anticipate following the €2Bn 2020-2024 CIP expenditure that the Airport shall no doubt still be deficient in the following areas:

- The continued lack of provision of early morning improved contact stand Terminal access facilities.
- The non-availability of Code F Contact Stands at Dublin Airport.
- Given a fuselage length of 77m, the high probability that PIER 4 nor the proposed Aer Lingus Pier 5 shall be able to accommodate Emirates (EK) 2020 EIS (Entry into service) of the B777-9. This ultimately may require EK to divert operations to Pier 3 thus benefiting EI operations at Piers 4 & 5.
- The continued lack of central de-icing facilities sought by five airlines.

1.7 S&T's role in relation to Determinations.

Steer at 5.9 states “As with Heathrow, there appears to be significant benefit at Dublin in involving the airlines, or an airline group representative such as IATA, as well as an IFS, throughout the StageGate process.”

We have outlined our reason why IATA should be a key stakeholder and in relation to the Airfield we remind CAR of our suggestion in response to Issues paper CP7/2018 whereby we recommended at 3.1 that the CAR transition to a Regulatory and Safety Oversight Role thus ensuring that CIP items conform to EASA and ICAO regulations.

As our relationship with the IAA-SRD matures, we would welcome an opportunity to dovetail our input to CAR along side that of the ANSP. In essence CAR's input to Stagegate (as to the functionality of CIP Airfield projects) should ideally be to co-ordinate IALPA-S&T, ANSP and SRD views.

We reiterate CAR's stated position at DRAFT 9.88 in that “We cannot compel Dublin Airport to deliver any particular project, nor is it our role to provide allowances for alternative projects not proposed by Dublin Airport”. We therefore expect an early interim review of the 2020 -2024 CIP which is devoid of the following items.

- A) A RWY 28L extension to 3500m (allowing Overweight Return to land and Extended Global Range / Markets Operations.
- B) ICAO standard 90 deg line up to the RWY 16 Threshold from the Eastern & Western Campus.
- C) Funding for High Intensity Centreline lighting on RWY 16/34.
- D) Construction of Taxiway W linking the West Apron and Apron 5M.
- E) Dual line up options to RWY 28L from both F Taxiways.
- F) Centralized De-icing facilities.

1.8 Brief comments in relation to the certain Draft CAR approved CIP projects.

Annexes and Associated Appendices:

- Appendix A: *Asset Care: Civil, Structural & Fleet (CSF)*
- Appendix B: *Asset Care: Mechanical & Electrical (M&E)*
- Appendix C: *Capacity*
- Appendix D: *Commercial Revenues – no comment*
- Appendix E: *IT - Information Technology*
- Appendix F: *Security – no comment*

Appendix A Asset Care: Civil, Structural & Fleet (CSF)

- CIP.20.01.001** Southern Runway (10R/28L) Decentralisation Programme
- We recommend the Removal of taxiway S3 (the old RWY 05 threshold), A Redesign of S5 to RET standard and the Installation of Drainage shores at the RWY 28 intersection with S5 and S2 exits.
- CIP.20.01.002** Apron Rehabilitation Programme
- To avoid nugatory expenditure works should comply with the 50mppa Masterplan.
- CIP.20.01.003** Airfield Taxiway Rehabilitation Programme
- To avoid nugatory expenditure works should comply with the 50mppa Masterplan.
- CIP.20.01.010** Airfield Lighting Control & Management System Improvement Programme
- IALPA-S&T request study of and installation of “Follow the Green” Technology
- CIP.20.01.012** AGL Substation T Development Programme
- Exclude Pier 2 & 3 Built in 1970’s i.e. It’s unwise to fund these Piers until DAA produce a revised Pier layout to cater for 50mppa.
- CIP.20.01.020** Terminal 1 Facade, Roof & Spirals
- A Removal of the Spirals would allow Future Terminal 1 Expansion and integration with T2. Eg a centralized Passenger Transfer Facility to the Western Campus via a Automatic Transfer Movement Facility.
- CIP.20.01.074** Advance Visual Docking Guidance System (5G, Pier 1 & Pier 2)
- Continued rollout on stands with the Ability to relocate same following a review of Eastern Campus Stand layout to 50mppa.
- CIP.20.01.099** RWY 16/34 Lighting for Low Visibility Procedures (LVP)
- RWY 16/34 is an operational Runway. This therefore is nugatory expenditure and funds should be diverted towards a new LVP Taxiway W.

Appendix B Asset Care: Mechanical & Electrical (M&E)

- CIP.20.02.004** Passenger Boarding Bridges (Maintenance & P3 Enhancement) & Fixed Electrical Ground Power.
- Maintain existing Bridges and Exclude any NEW Funding for Pier 2 & Pier 3 Bridges. Pier 2 requires redevelopment whilst Pier 3 expansion effects Dual F’s Taxiway Efficiency.
- CIP.20.02.008** Terminal Buildings HVAC Upgrade
- Pending a review of Piers Exclude Pier 2 & 3 upgrade.

CIP.20.02.010 Pier 3 Life Extension Works - Mech, Elec and Foul Drainage

- Campus Masterplan should investigate a New T1 Hammerhead Pier suggested by CEPA as an option to replace Pier 3.

Appendix C **Capacity**

CIP.20.03.006 Terminal 1 Kerbs

- € 13.6m. According to Riconda the justification for this is to increase additional set down facilities to cater for 40mppa. Essentially practically all T1 access and Car parks traffic shall use a 9m wide entry road between T2 and T1. S&T shall highlight public hazards associated with this project at a later stage. Funding should be predicated on receiving Planning permission.

CIP.20.03.016 Terminal 1 - Rapid Exit Arrivals

- At €2.2m this unnecessarily duplicating Meet and greet, Customs exit posts /Offices.

CIP.20.03.020 Terminal 2 Check-in Area Optimisation

- € 14.8m Poor initial T2 design or start of compaction within original design.

CIP.20.03.028 Terminal 2 Early bag store and transfer lines

- At €27,9m This CIP shall be Built within the HBS “existing footprint”. Other options worth considering are additional ULD Storage Units (as per CIP.20.07.032) as a stopgap pending review of the IALPA Pier 5 which eventually shall eliminates this CIP requirement at T2.

CIP.20.03.029 New Pier 5 (T2 and CBP Enabled)

- Facilitates a dominant base carrier – Thwarts CAR’s principles of meeting the needs of Future users and its location Prevents T2 Easterly Expansion.

CIP.20.03.030 Expansion of US Pre-Clearance Facilities

- This € 50m expenditure meets the Base Carrier requirements but is Incompatible for HUB Competition and expansion to 50mppa. However, the current Facility is ideal for NBE CBP operations. Locating a WB facility at the IALPA Pier 5 ensures adequate competition and facilitates additional expansion opportunities to 50mppa.

CIP.20.03.031 South Apron Expansion (Remote Stands, Taxiway and Apron)

- At € 89.7m. Incompatible for HUB Competition and current design carries height restrictions on certain aircraft types. Divert funding to IALPA Pier 5

CIP.20.03.033A Enablement of Pier 3 for Precleared US bound passengers

- At €8.5m. Incompatible for HUB Competition and complicates the limited space available in Pier 3. S&T have concerns for emergency egress routes in a building that shall segregate both EU and 3rd Country arrivals, EU departures and secured /sterile US CBP passengers. Nugatory expenditure, therefore, divert funding to IALPA Pier 5.

CIP.20.03.034 Pier 3 Immigration (Upgrade & Expansion)

- At €5.7m. Incompatible for HUB Competition. Divert funding to IALPA Pier 5

CIP.20.03.036 North Apron Development – Pier 1 Extension (Module 1) & Apron 5H PBZ

- At €175m Apron 5H conflicts with Runway 28R Dual Taxiway system and centralised de-icing Facility for RWY 28R Departures. Expansion of passenger operations on the North Apron causes additional pressure on T1 Immigration facilities and restricts movement to Hangers.

CIP.20.03.043A Terminal 1 Piers - New Airbridges (6NBE / 3WB)

- At €33.9m Incompatible for HUB Competition. Nugatory expenditure, divert funding from Pier 2 & 3 to IALPA Pier 5

CIP.20.03.049 De-icing pad at Runway 10R.

- At €5m this sub-standard lone WB facility is not strategically located. IALPA propose Centralised De-icing facilities for RWY 10L and 28R. The Western Campus RWY 10L and 28R combined WB and NBE de-icing facility should be located within Apron 5M.

CIP.20.03.051B West Apron Vehicle Underpass - Pier 3 Option

- Pier 3 Exit Location requires redesign to suit long term new Pier3. International norms would locate a Dual entry / exit parallel to the F-Inner Taxiway. Further advise available on request.

CIP.20.03.052 Surface Water Environmental Compliance

- Our proposed Centralised de-icing facilities for exclusive RWY 10L/28R operations may negate this proposed expenditure.

CIP.20.03.054 New Remote Apron 5M - 17 NBEs

- CODE E / CODE E Taxiway Centreline separation should be (min 330m) to allow insertion of a Satellite Pier.

CIP.20.03.071 Hydrant Enablement - Pier 2 & 3

- At €23.6m this is obvious nugatory expenditure, there being No near term (15yr) Masterplan forthcoming from the DAA in relation to these Piers. Divert funding for fuel line to serve a Holding Tank on the western Campus.

Appendix E IT - Information Technology

CIP.20.05.011 Security Technology Innovation (Biometrics & FOD Detection)

- Await fully proven technology system installed at other peer airports.

CIP.20.05.020 Innovation Fund

- Specific funding should support an Aerodrome drone detection system compliant with EASA regulations.

Appendix F Security - no comment

Appendix G Others

CIP.20.07.004 Metro Coordination

- We agree that this is not a CIP project. The DAA should engage with the NTA on this matter to future proof Terminus Status at Dublin Airport on the Western Campus.

Conclusion:

IALPA S&T thanks the CAR for the opportunity to participate in the Draft Determination and are available to discuss any matter including an opportunity to voice our views on the Airfield Simulation exercise carried out by Helios.

It is no secret that IALPA and DAA have very serious differences on the development of infrastructure at Dublin Airport. It is regrettable that consultation between the parties to date is unsatisfactory. However, IALPA and DAA agree that Dublin Airport should provide world class facilities to serve all the stakeholders in the Irish Economy. It is the view of IALPA that the draft determination will have detrimental consequences on meeting these shared objectives. We would ask the CAR to review its determination.

Finally, as already stated the DAA does not consciously engage with the representatives of the primary end users (eg line pilots) of their proposed Airside CIP infrastructure projects. Therefore, IALPA very much welcome the continued opportunity afforded to us by CAR.

Yours sincerely,



pp Capt. John Goss
Director
Safety & Technical
Irish Air Line Pilots Association