

Ms. Catherine Mannion  
Commissioner  
Commission for Aviation Regulation  
3<sup>rd</sup> Floor, Alexandra House  
Earlsfort Terrace  
Dublin 2

14<sup>th</sup> July 2017

Dear Ms Mannion,

**Proposed revision to the Slot Sanction Scheme Guidelines**

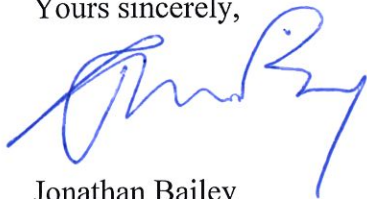
I am writing to you on behalf of the members of IAG (Aer Lingus, British Airways, Iberia and Vueling) to express our concern about the proposed revision to the guidelines governing the Slots Sanction Scheme in Ireland, with particular reference to Dublin airport.

Whilst we support a number of the suggested changes, we are extremely worried by the removal of the text '*in the past 6 months*' from Section 3.5. Under the revised guidelines, the coordinator would be able to sanction airlines based on single instances of slot misuse years apart, which we do not believe to be appropriate for the majority of operators.

If, as we understand it, this change has been prompted by the behaviour of GA/BA operators at Dublin, we suggest that the guidelines be updated so that the revised text applies only to these particular operators and not to those of regular scheduled flights. We also recommend consideration is given to incorporating Section 6.2 of the UK guidelines into the Irish text, allowing the coordinator to consider the impact a particular instance of misuse had on other operators and previous behaviour when deciding whether a sanction is appropriate, or at what level a sanction should be set.

Lastly, although we agree with the revised definition of '*intention*' as detailed in Section 3.6, we think the guidelines should include a reference to events beyond an airline's reasonable control being able to be used as a defence against a sanction, similar to provisions in the UK. This would include elements such as exceptional weather conditions, industrial action, air traffic control delays, and other factors preventing the safe operation of a flight.

Yours sincerely,



Jonathan Bailey  
Head of Corporate Affairs  
Registered Office

International Consolidated Airlines Group, S.A.  
El Caserío, Iberia Zona Industrial nº 2 (La Muñoza)  
Camino de la Muñoza s/n, 28042 Madrid, Spain

Registro Mercantil de Madrid,  
tomo 27312, folio 11, hoja M-492129  
C.I.F. A85845535

UK Branch Registered Address

International Airlines Group  
Waterside (HAA2), PO Box 365  
Speedbird Way, Harmondsworth  
UB7 OGB, United Kingdom

Registered in England & Wales BR014868