



Deutsche Lufthansa AG, Lufthansa Aviation Center
Airportring, 60546 Frankfurt/Main, Germany

IAA
Irish Aviation Authority
11 – 12 D'Olier St. Dublin 2
Ireland

Lufthansa Response to IAA 's draft decision regarding Ryanair 's complaints

Dear all,

Lufthansa appreciates the opportunity to provide our perspective on the IAA's draft decision regarding Ryanair's complaint about Dublin Airport's charges for 2024. Overall, we find it appropriate that the IAA is evaluating Dublin Airport's charge scheme using a structured approach based on transparent, relevant, and objective criteria. Unjustified charges can result in market distortions, particularly given the context of a monopoly provider. We also concur with many of the findings outlined in the consultation document.

Our detailed views on each of the charge modulations are outlined below.

CO2 Modulation

We fully support the IAA's position that the CO2 modulation has not been adequately justified. As we have repeatedly expressed, we remain highly skeptical about the implementation of the low emissions scheme, fearing it might distort the market without effectively reducing emissions. Our rationale is detailed below:

- **Cost-Relatedness:** CO2 emissions from aircraft operations are unrelated to the provision of airport infrastructure or services, and airports do not incur costs associated with mitigating or preventing greenhouse gas emissions from aircraft engines.
- **Inconsistency with International Policies and Regulatory Requirements:** ICAO member states have unanimously endorsed the principle that CO2 emissions from international aviation should be accounted for only once. They have also



agreed to address these emissions through CORSIA, recognizing it as the sole market-based measure for international flights.

- Trade-Offs: If charges are intended to act as incentives, it is crucial to recognize that modulating charges based on too many variables will render them ineffective and could lead to undesirable trade-offs.

NOx Charges

- Similar to our concerns with CO2 modulation, we also have reservations about the implementation of NOx-related charges at Dublin Airport. Specifically, the airport has not demonstrated the existence of a NOx issue nor explained how the proposed charging mechanism will address it.
- We therefore concur that the NOx modulation does not meet the criteria of being transparent, relevant, and objective.

Incentive Schemes

As previously communicated to Dublin Airport, user charges are significantly increased to fund the airport's incentive schemes, resulting in users paying for incentives from which they do not benefit. The airport has neither justified the necessity of such incentives nor provided a counterfactual scenario in the absence of these incentives.

Aircraft Parking Charges

Currently, there are eight types of parking charges. While some of the differences are intuitive, it remains unclear whether the scale of these differences is relevant, objective, and transparent

Mit freundlichen Grüßen

Gentili, Pia
Director Commercial Airport Agreements Cont

Pia.gentili@dlh.de

Mitglied der IATA/Member of IATA

Telefon/Phone +49 69 696-0
lufthansagroup.com

Deutsche Bank AG, Köln
Kto. Nr. 106 141 500
BLZ 370 700 60
IBAN DE95 3707 0060 0106 1415 00
SWIFT-Code DEUT DEDK XXX

Citibank N.A., New York
(nur Zahlungen/only payments in USD)
Kto. Nr. 405 628 92
BLZ 021 000 089
SWIFT-Code CITI US 33

USt-ID-Nr./Tax ID number DE 122 652 565

Sitz der Gesellschaft/Corporate Headquarters
Deutsche Lufthansa Aktiengesellschaft, Köln

Registereintragung/Registration
Amtsgericht Köln HRB 2168

Vorsitzender des Aufsichtsrats/
Chairman of the Supervisory Board
Dr. Karl-Ludwig Kley

Vorstand/Executive Board
Carsten Spohr (Vorsitzender/Chairman)
Dr. Michael Niggemann
Grazia Vittadini
Dieter Vranckx