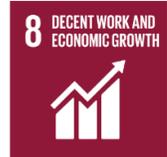




**Chambers
Ireland**
Advancing business together



Pre-Legislative Scrutiny of the General Scheme for the Dublin Airport (Passenger Capacity) Bill 2026

Submission by Chambers Ireland

February 2026

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About Chambers Ireland

Chambers Ireland is an all-island business organisation with a unique geographical reach. Our members are the Chambers in the cities and towns throughout the country – active in every constituency. Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities.

Key Points

- The Passenger Cap has artificially restricted the growth of Dublin Airport, causing economic damage and limiting Ireland's connectivity. Lifting the Cap removes an unnecessary and arbitrary constraint on essential national infrastructure. Planned legislation to lift the Cap is therefore strongly welcomed.
- By constraining connectivity, the Passenger Cap has damaged: Business travel, Export performance, Inward investment and Ireland's overall competitiveness.
- Maintaining the Passenger Cap would harm Ireland's strategic economic interests, particularly as Ireland seeks to diversify beyond traditional markets.
- Aviation emissions must align with Ireland's binding climate targets, but they cannot be addressed unilaterally at national level. Meaningful emissions reductions in aviation will be delivered primarily through: Technological innovation, Sustainable Aviation Fuel (SAF), and Hydrogen and other low-carbon technologies.
- Concerns about under-utilisation of regional airports are legitimate. However, this is not a zero-sum issue. Constraining Dublin does not automatically redirect traffic to regional airports. Airline route decisions are driven by demand, connectivity and commercial viability. The appropriate response is a dual approach: Support Dublin Airport as the State's primary international hub and simultaneously invest in regional airports, route development incentives and surface access.

Chambers Ireland welcome the initiation of legislation aimed at the lifting of the Dublin Airport Passenger Cap. This has been artificially restricting the growth of Dublin Airport and limiting our economic growth and the plans to lift this unnecessary restriction are welcome.

Dublin Airport is essential national infrastructure for a small, open, island economy. It contributes €10 billion in gross value added (GVA) to the Irish economy and supports over 116,000 jobs. As our principal international gateway and only hub airport it is a critical enabler of trade, investment, tourism and national competitiveness. For an island economy at the edge of Europe, air connectivity is a core economic necessity, underpinning both passenger and cargo flows. Dublin Airport is therefore a strategic national asset whose role must evolve in line with population growth, expanding trade intensity and increasing reliance on international markets. Planned infrastructure upgrades are intended to support the more intensive and efficient use of existing terminals, yet the arbitrary 32 million Passenger Cap has acted as a binding constraint on that objective, limiting the effective utilisation of infrastructure that already exists or is being delivered.

Capacity constraints undermine Ireland's economic objectives

Reduced flight frequency and less long-haul connectivity than we could have, undermines same-day and short-notice business travel. This has increased travel times and costs for Irish firms, reduced face-to-face engagement with clients and partners, and weakened Ireland's attractiveness as a base for internationally mobile business activity. Constrained connectivity raises business costs and diminishes productivity by limiting access to global networks. The benefits of maintaining strong flight connections are clear. ACI Europe research shows that every 10% increase in direct connectivity is associated with a 0.5% increase in GDP per capita¹.

¹ <https://www.aci-europe.org/media-room/513-new-study-shows-airports-air-connectivity-power-5-of-european-gdp-also-supporting-quality-education-gender-equality-r-d-and-well-being.html>

In addition, air connectivity plays a critical role in supporting high-value, time-sensitive exports, particularly in sectors such as pharmaceuticals, medtech, technology and professional services. International research² demonstrates that exports to well-connected countries are significantly higher than to poorly connected markets, reflecting the importance of frequent and reliable air links for trade intensity.

Strong air connectivity is also a key determinant of foreign direct investment, especially in knowledge-intensive and internationally integrated sectors. In addition, there is a strong statistical relationship between the quality of a city's air connectivity and the likelihood that multinational firms will locate or expand operations there³. Capacity constraints at Ireland's primary hub airport have therefore weakened Ireland's competitive proposition when compared with peer economies that are actively expanding connectivity.

Maintaining the Passenger Cap would have harmed Ireland's strategic economic interests at a time when it is imperative to strengthen economic links beyond our traditional core markets. Growing uncertainty in EU-US relations has underscored the risks of over-reliance on a small number of trade partners and has accelerated efforts to deepen engagement with alternative markets. In this context, major trade developments such as the EU-India agreement, and the prospective implementation of the MERCOSUR deal, are of particular importance for Ireland.

There is already substantial unmet demand for direct air connections to India and South America⁴, and the expansion of trade relationships under these agreements will further increase that demand. Ireland must therefore ensure that it is in a position to fully capitalise on the economic opportunities they present. This requires that Dublin Airport has the capacity to respond to growing demand and is empowered to develop new long-haul routes to key

² <https://blog.aci.aero/airport-economics/air-connectivity-aviation-policy-economic-growth/>

³ <https://smart.mit.edu/post/smart-study-reveals-strategic-flight-connections-key-to-attracting-global-business-and-investment>

⁴ <https://www.dublinairport.com/latest-news/2026/02/10/daa-welcomes-government-decision-to-remove-the-passenger-cap-at-dublin-airport>

emerging markets. Ensuring adequate connectivity is essential if Ireland is to translate these trade agreements into tangible gains in exports, investment and long-term economic resilience.

Managing capacity while upholding environmental standards

Lifting the passenger cap at Dublin Airport raises legitimate environmental considerations, including emissions, noise, land use and local impacts. These issues must be addressed in line with Ireland's climate and environmental commitments. However, maintaining a fixed and artificial capacity limit was not a proportionate or effective response, particularly given the significant constraints it places on national connectivity, competitiveness and economic resilience. Investment in enabling infrastructure such as MetroLink will play a critical role in supporting lower-carbon access to Dublin Airport, ensuring that increased passenger capacity is aligned with wider climate and sustainability objectives.

Ireland's demographic and economic circumstances have changed substantially since the 32 million passenger cap was imposed following the completion of Terminal 2 in 2010. The population has grown by approximately 30% over the past two decades, and Ireland now has one of the youngest and fastest-growing populations in the EU. Even a simple adjustment to reflect population growth would imply a capacity closer to 37 million passengers per annum, before accounting for increased labour mobility and the needs of an export-led, internationally integrated economy.

Meaningful reductions in aviation emissions require coordinated action within the European Union and through international frameworks, to ensure consistency, avoid competitive distortion, and deliver emissions reductions that are both effective and enforceable. Over the medium to long term, aviation emissions reductions will be delivered primarily through technological and fuel innovation rather than through artificial constraints on capacity. Ireland has already developed credible strategies in areas such as Sustainable Aviation Fuel and hydrogen, and the key policy challenge is to enable their deployment at scale. Constraining

essential national infrastructure risks significant economic harm while failing to deliver a proportionate or durable climate benefit.

Developing regional airports should complement, not substitute for, Dublin Airport connectivity

Concerns about the concentration of passenger traffic at Dublin Airport and the under-utilisation of regional airports are legitimate and should be addressed through targeted policy measures. However, it is important to recognise that this is not a zero-sum situation. Unnecessarily constraining capacity at Dublin Airport does not, of itself, result in additional flights being diverted to Cork, Shannon or other regional airports. Airline route decisions are driven by demand, connectivity, aircraft utilisation and commercial viability, and restricting Dublin risks suppressing overall connectivity rather than redistributing it. That said, there is clear spare capacity at regional airports particularly Shannon, which is underutilised by approximately 2.5 million passengers per annum⁵ and there is scope to develop viable new routes where demand exists. The appropriate response is a dual approach: supporting Dublin Airport to function effectively as the State's primary international hub, while simultaneously investing in regional airports, incentivising route development, and improving surface access and connectivity so that Cork and Shannon can realise their full potential. Strengthening regional airports requires proactive measures and investment, not artificial constraints on the national gateway, and both objectives can and should be pursued in parallel.

⁵ <https://www.gov.ie/en/department-of-transport/press-releases/minister-lawless-announces-funding-allocation-of-over-42-million-to-support-sustainability-projects-at-shannon-and-cork-airport/>