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To:

Irish Aviation Authority (Regulatory Oversight)
Department of Transport (Minister and Aviation Division)

RE: Breach of EASA Regulation (EU) No 139/2014 – ADR.OPS.B.020 Wildlife Strike Hazard Reduction

Dear Sirs,

This letter is to formally notify you of a serious and ongoing breach of European aviation safety regulation resulting from daa's unilateral revision of the Runway 28R Standard Instrument Departure (SID) at Dublin Airport.

Under **EASA Regulation (EU) No 139/2014**, the aerodrome operator is required to:

1. **Assess the wildlife hazard** on and in the surroundings of the aerodrome, implementing a risk management programme that includes an area up to 13 km (7 NM) from the aerodrome reference point;
2. **Establish means and procedures** to minimise the risk of collisions between wildlife and aircraft;
3. **Notify the appropriate authority** if any wildlife assessment identifies hazardous conditions in the surrounding area.

The departure routing currently in use from 28R involves a turn at just 400 feet AGL and routes directly over a **bird-rich compensation habitat established by daa** itself as part of the planning conditions for North Runway construction. This routing places aircraft at elevated risk of bird strike during the critical climb-out phase.

To our knowledge, daa has:

- **Not published any wildlife hazard assessment** relating to this revised flight path;
- **Not notified the IAA or EASA** of increased strike risk as required by ADR.OPS.B.020(c);
- **Increased risk exposure** by voluntarily routing aircraft over a known habitat in a region used by protected species, including Brent Geese and Lapwings;
- **Violated the spirit and letter** of international safety guidance, including EASA SIB 2021-07 which recommends operators avoid bird habitats at low altitude whenever possible.

The 28R routing contradicts core principles of:

- Environmental planning (via unapproved deviation from EIS assessed route);
- Noise mitigation (via unassessed overflight of previously unaffected communities);
- Wildlife hazard reduction (by creating a new conflict zone within the aerodrome's strike radius).

We respectfully demand that:

1. daa immediately suspend the use of the non-compliant 28R departure routing;
2. A full wildlife hazard assessment be conducted and published in line with EASA ADR.OPS.B.020;
3. The IAA confirm whether it was formally notified of wildlife hazard exposure as required;
4. The Department of Transport clarify whether it will intervene to uphold EU aviation safety law.

We reserve the right to escalate this matter to the European Commission and EASA if remedial action is not taken.

Regards,

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