

Annex D4: IAA Safety Report and Institutional Response

Source

Safety Report filed by Gareth O'Brien on 10 September 2023 via email to multiple IAA addresses and via ECCAIRS2 occurrence reporting portal. Full documents in IAA Safety Report archive. Subsequent correspondence and meeting through June 2024.

The Safety Hazard

The RWY28L (south runway) missed approach procedure is in direct conflict with the RWY28R (north runway) departure tracks (Standard Instrument Departures / SIDs).

When the north runway was added for parallel operations, the legacy missed approach procedure for the old runway (now designated 28L) was never updated. It was designed decades earlier for a single 10-28 runway configuration. The missed approach track now intersects the path of 300+ daily departures from the north runway.

The departure traffic crosses the missed approach track at Ratoath and to the east of Ashbourne, directly overhead an area where approximately 26,000 people live.

Technical Details

- The missed approach altitude in the conflict zone is 3,000ft MSL
- Multiple departure tracks cross the missed approach at or near the same altitude
- Review of ADSB data for 27 February 2024 showed 24 aircraft penetrated the missed approach track with less than 1,000ft vertical separation; several were at or about 3,000ft (zero vertical separation from a missed approach aircraft)
- No communications failure procedures are published for the missed approach; the default behaviour for an aircraft unable to communicate with ATC is to fly the published missed approach directly into the conflict zone
- The procedure is entirely dependent on ATC human intervention every time an aircraft goes missed on 28L

Institutional Response: Full Timeline

1. IAA Dismissal (23 November 2023)

The IAA's entire response, received 10 weeks after the report was filed, consisted of three sentences from an anonymous IAA employee with no individual name:

"On receipt of your email in September, the IAA tasked a team of Air Traffic Services and Airspace Inspectors to review your report. This review examined the current air traffic management procedures used at Dublin Airport and the associated airspace."

"Our review concluded that the procedures, and the personnel that implemented these procedures (air traffic controllers), ensured that safety was maintained within acceptable levels."

"If you have any safety related submissions, please submit to the IAA using the ECCAIRs portal on the IAA web site."

Key features of this response:

1. Anonymous: no individual name attached
2. Past tense ("safety was maintained"), implying treatment as a one-off event rather than an ongoing systemic hazard
3. Deflects onto ATC personnel rather than addressing the published procedure
4. Redirects to ECCAIRS, a system that only accepts single incident reports, effectively shutting down discussion of the systemic problem
5. Provides no technical justification, no explanation of how the procedures were safe, and no acknowledgment of the specific technical evidence presented

2. Reporter's Rebuttal (23 November 2023)

The reporter immediately contested this response on the same day, pointing out that the response did not address the substance of the report and that a 3-sentence email with no technical content was not an adequate response to a documented ongoing conflict between 300+ daily departures and an unpublished missed approach procedure.

3. Six-Month Follow-Up (2 March 2024)

A detailed follow-up was sent including new ADSB data showing 24 aircraft penetrated the missed approach track with less than 1,000ft separation in a single day (27 February 2024). Copies were sent to senior IAA personnel including CEO Declan Fitzpatrick.

4. IAA Meeting (20 June 2024)

Following continued correspondence, the IAA invited the reporter to a meeting at IAA HQ on D'Olier Street on Thursday 20 June 2024 at 0900.

At this meeting, the IAA revealed that AirNav Ireland had implemented a workaround for the missed approach conflict: the airport drops to dependent mode operations in the event of a missed approach on 28L, or when weather conditions make missed approaches likely. In dependent mode, departures from 28R are immediately stopped. A departing aircraft must line up and wait on 28R until the landing aircraft is wheels down on 28L before being cleared for takeoff.

This was significant for two reasons:

First, it confirmed that the conflict between the 28L missed approach and 28R departures was real and required active mitigation, contradicting the IAA's earlier dismissal that "safety was maintained within acceptable levels" as though no hazard existed.

Second, the dependent mode workaround has direct capacity consequences. daa has repeatedly claimed that dependent mode operations are unacceptable because they are "the same as having one runway." This is contradicted by international experience: London Gatwick Airport achieves 48 million annual passengers using a single runway, and has projected it could handle 75 million or more passengers using dependent mode operations on its proposed second runway (which would require moving the existing parallel runway by approximately 12 metres to meet regulatory spacing).

5. AirNav's Parallel Refusal (17 November 2023)

In a separate but related track, AirNav CEO Peter Kearney wrote to daa on 17 November 2023 (via Peter Pollard) declining to study the NRTG proposal for modifying the missed approach to allow straight-ahead departures. The letter stated that a meeting with ASAP (an Italian Air Navigation Services Provider) on 5 November 2023 had established that the proposal was "complex" and required "further consideration," but AirNav concluded it would not conduct any further modelling, simulations, or technical assessments.

This refusal was confirmed by AirNav's AIE response of 7 July 2025 (Annex G8), which stated: "No additional modelling, simulations, or technical assessments beyond the regulatory review and discussion with A.S.A.P. were commissioned or undertaken by AirNav Ireland."

Aarhus Relevance

The safety report and institutional response are relevant to the Aarhus communication because they demonstrate that the flight path deviation from the approved NPR has safety consequences as well as environmental ones. The conflict exists precisely because the departure routes were changed from straight-ahead (as assessed in the EIS) to divergent turns. The same route change that created the environmental impact, without public participation, also created the safety conflict.

The institutional response follows the broader pattern: the IAA initially dismissed the concern with a perfunctory 3-sentence reply, then at a subsequent meeting confirmed that the hazard was real and required active mitigation (dependent mode operations). Despite this confirmation, no steps were taken to address the root cause, namely the departure route design that creates the conflict. AirNav refused to study alternatives. The public was left with information that the hazard exists, that a workaround is in place, and that no one will address the underlying problem.

Source Files

- IAA Safety Report archive: /mnt/c/Users/gobri/ownCloud/Aviation/28R/IAA Safety Report/
- AirNav AIE response (Annex G8): includes Pollard letter of 17 November 2023
- IAA Safety Report PDF and Response PDF: Annexes D4