

Annex F6: Corporate Enforcement Campaign, Summary of Letters and Responses

Source

Compiled from NRTG corporate enforcement campaign records (April-August 2025).

Campaign Overview

On 24 April 2025, the North Runway Technical Group (NRTG) launched a coordinated enforcement and letter-writing campaign comprising 14 formal letters sent simultaneously to government departments, regulators, airlines, and oversight bodies. A second wave of follow-up letters continued through August 2025.

Letters and Responses

Recipient	Date Sent	Response	Date	Summary
daa Board of Directors (all 13 individually)	24 Apr 2025	Yes	2 May 2025	"No further engagement" via Company Secretary
daa Chair Basil Geoghegan (conflict of interest)	24 Apr 2025	Yes	29 Apr 2025	2-line dismissal
daa CEO Kenny Jacobs	24 Apr 2025	None		
Corporate Enforcement Authority	24 Apr 2025	Yes	1 May 2025	Declined jurisdiction: "not within the remit of the CEA"
CEA Supplementary	30 Apr 2025	None		
Attorney General	2 May 2025	None		
Fingal County Council	24 Apr 2025	Yes	7 May 2025	Confirmed seven Warning Letters and one Enforcement Notice issued across five permissions; on Condition 1 (flight paths): "No further update regarding this matter is available at this time"
Ombudsman (re Fingal)	24 Apr 2025	Investigation opened		
Minister for Transport (governance)	24 Apr 2025	None		As of August 2025 follow-up
Minister for Transport (board)	24 Apr 2025	None		As of August 2025 follow-up

Asst Secretary Ethna Brogan	24 Apr 2025	None		Not even acknowledged
Follow-up to Minister	29 Aug 2025	Pending		
Minister for Housing/Planning	24 Apr 2025	None		
Ryanair Board	24 Apr 2025	daa is responsbile for running the airport		
Aer Lingus Board	24 Apr 2025	None		
AirNav Ireland	24 Apr 2025	None		
An Bord Pleanala	26 Apr 2025	None		
Minister for Housing (PSZs)	11 Nov 2025	None		Requested clarification on PSZ responsibility; no response
SIPO	28 Aug 2025	Filed		Complaint No. 68b174387ef8e60012e6349d
FOI to Dept of Transport	2 May 2025	Yes	3 Jun 2025	5 records partially released (FOI-2025-0120)

Response Pattern

Of the 14+ formal letters:

- 4 received substantive responses (all negative: "no further engagement," dismissal, declined jurisdiction, "no further update")
- 1 received a FOI response
- 1 received a referral to daa (Ryanair)
- 1 SIPO complaint was filed
- 8+ received no response at all, including letters to the Attorney General, the Minister for Transport, the Minister for Housing, AirNav Ireland, and An Bord Pleanala

Key Quotes from Responses

daa Board (2 May 2025):

"Please regard this letter as a formal notice that there will be no further engagement with your group on these points from a board perspective."

CEA (1 May 2025):

"The issue the subject of your correspondence does not fall within the remit of the CEA and as such we have no role to play in this matter."

Fingal County Council (7 May 2025):

"No further update regarding this matter is available at this time."

Fingal confirmed that "seven Warning Letters and an Enforcement Notice have now been issued" across five planning permissions (F04A/1755, F04A/1755/E1, F19A/0023 / ABP-305298-19, F06A/1248, F06A/1843). The Enforcement Notice (singular, as of May 2025) relates to night flights (July 2023). The passenger cap enforcement notice was issued in June 2025, after this response.

Aarhus Relevance

The campaign documents a systematic attempt to exhaust domestic remedies. Every body in the chain of responsibility was formally notified. The pattern of responses (refusal, jurisdictional declination, or silence) demonstrates that there is no effective domestic mechanism through which the affected public can secure enforcement of the planning conditions upon which public participation in the original EIS process was predicated.