

Annex G5: Verbatim Identical Language, daa CEO to Minister

Source

Comparison of JCTC-33-1216 (Kenny Jacobs to Senator Horkan, 4 April 2024) with TTAS-MO-01250-2024 (Minister Ryan to Cllr Alan Tobin, 10 April 2024).

Context

On 4 April 2024, daa CEO Kenny Jacobs wrote to the Joint Committee on Transport and Communications in response to questions about North Runway flight paths. Six days later, on 10 April 2024, Minister Eamon Ryan's Private Secretary used the same language in a response to Meath County Councillor Alan Tobin, who had requested a meeting on behalf of affected communities.

Verbatim Phrases

The following phrases appear in both documents, word for word:

Jacobs (4 April 2024)	Minister Ryan (10 April 2024)
"complex proposal in the context of Dublin Airport airspace"	"complex proposal in the context of Dublin Airport airspace"
"wide range of factors that must be considered"	"wide range of factors that must be considered"
"proposals of this nature need to be considered in a structured and coherent manner, and not in isolation"	"proposals of this nature need to be considered in a structured and coherent manner, and not in isolation"
"engaged with the relevant agencies to determine how such a process could be run in the future"	"engaged with the relevant agencies to determine how such a process could be run in the future"
"seeking engagement with other airports who have implemented similar consultation processes"	"seeking engagement with other airports who have implemented similar consultation processes"

Jacobs' Letter (JCTC-33-1216, Relevant Extract)

As outlined to the Committee by AirNav Ireland (ANI), a review of the procedures that are in place at Rome FUI airport has recently been completed by ANI, and its findings have been shared with daa. The output of the review reaffirms that this is a complex proposal in the context of Dublin Airport airspace and there are a wide range of factors that must be considered. Ultimately proposals of this nature need to be considered in a structured and coherent manner, and not in isolation.

>

As a result, we are now engaged with the relevant agencies to determine how such a process could be run in the future, which may provide scope to further explore these types of suggestions and other community proposals in respect of flightpaths. As part of this, we are seeking engagement with other airports who have implemented similar consultation processes, and will be coordinating this activity with AirNav Ireland.

Minister's Response (TTAS-MO-01250-2024, Relevant Extract)

This is a complex proposal in the context of Dublin Airport airspace and AirNav Ireland and daa are considering the wide range of factors that must be considered including regulatory and safety requirements. It is important to highlight that any potential changes of this nature would ultimately require detailed consideration in terms of airspace re-design and regulatory compliance, in addition to corresponding consultation processes with key stakeholders.

>

daa advise that ultimately, proposals of this nature need to be considered in a structured and coherent manner, and not in isolation. As a result, daa is now engaged with the relevant agencies to determine how such a process could be run in the future, which may provide scope to further explore suggestions and other community proposals in respect of flightpaths. As part of this, daa is currently seeking engagement with other airports who have implemented similar consultation processes, and will be coordinating this activity with AirNav Ireland over the coming months.

The False Premise

Jacobs' letter opens with the claim that "a review of the procedures that are in place at Rome FUI airport has recently been completed by ANI." AirNav's AIE response (7 July 2025) confirmed that no such review was conducted: "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. No internal reports, technical studies, or presentations were prepared by AirNav in this context."

The Minister's response was therefore not merely copied from daa; it was copied from a letter that contained a false claim about AirNav's work. The Department adopted daa's language as ministerial policy without independent verification, including the false premise on which it was based.

Aarhus Relevance

This demonstrates a structural failure of Article 5 (collection and dissemination of environmental information). The Department of Transport, which is responsible for oversight of the aviation sector, has no independent capacity to assess the information provided by the entities it oversees. It functions as a channel for daa's corporate communications, presenting them to elected representatives and the public as Government policy. The affected public cannot obtain accurate information from the Department because the Department does not produce any.