

Seirbhís Aerloingseoireachta
na hÉireann

ag trádáil mar **AirNav na
hÉireann**

Foirgneamh na hAimann
11–12 Sráid D'Olier
Baile Átha Cliath 2, D02 T449,
Éire

The Irish Air Navigation
Service

trading as **AirNav Ireland**

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1 May 2026

Gareth O'Brien BE (Civil), MSc
North Runway Technical Group
24 White Ash Park
Ashbourne
Co Meath
A84 H563

BY EMAIL

Re: Decision on a request dated 3 April 2026 under the Access to Information on the Environment Regulations 2007–2018 (as amended).

Dear Mr O'Brien

I refer to your request dated 3 April 2026, made under the Access to Information on the Environment Regulations 2007–2018 as amended (the "**AIE Regulations**"), seeking access to environmental information held by The Irish Air Navigation Service trading as AirNav Ireland ("**AirNav Ireland**").

Your request sought:

- 1. The total number of off-track flight events (i.e. flights deviating from the published SID for any runway at Dublin Airport) that daa has referred or forwarded to AirNav Ireland, from 1 August 2022 to the date of this request. A single total is sufficient; if the data is readily available by runway designator or by calendar year, I would welcome that breakdown but do not require it.*
- 2. A summary of the actions taken by AirNav Ireland in response to these referrals. I am not requesting individual case files. I am requesting: (a) the total number of referrals that resulted in an investigation by AirNav; (b) the total number that resulted in any corrective action; (c) the total number where an outcome was communicated back to daa; (d) the total number where an outcome was communicated to the original complainant.*
- 3. Any protocol, procedure, memorandum of understanding, or agreement between AirNav Ireland and daa governing the referral of off-track flights, including the respective responsibilities of each party for investigation and corrective action.*
- 4. Any internal analysis, report, or briefing note prepared by AirNav Ireland on the pattern, frequency, or causes of off-track departures from any runway at Dublin Airport since 1 August 2022.*

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Dublin 2, D02 T449, Ireland

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Foirgneamh na hAimann, 11–12 Sráid D'Olier
Baile Átha Cliath 2, D02 T449, Éire

Uimhir Chláraithe: 734291. Áit Chláraithe: Éire

Cuideachta Ghníomhaíochta Ainmnithe

5. A description of the corrective actions available to AirNav Ireland when an off-track referral is received (for example: communication with the airline operator, amendment to ATC procedures, notification to the IAA), and which of these have been used since 1 August 2022.

I, Deirdre Forrest, AIE Officer, have now made a final decision on 1 May 2026 regarding your request. The purpose of this letter is to explain that decision. For clarity, AirNav Ireland has assessed your request based on our understanding of what is meant by “off-track flight events”, meaning flights deviating from the published Standard Instrument Departure (“SID”). If some other meaning is attributed to this, please advise, and AirNav Ireland will undertake an assessment based on the alternative meaning provided.

1. Findings, particulars and reasons for decisions

1.1 The total number of off-track flight events (i.e. flights deviating from the published SID for any runway at Dublin Airport) that daa has referred or forwarded to AirNav Ireland, from 1 August 2022 to the date of this request. A single total is sufficient; if the data is readily available by runway designator or by calendar year, I would welcome that breakdown but do not require it.

I have completed my consideration of your request.

Regulation 7(5) of the AIE Regulations requires a public authority to inform an applicant where the environmental information requested is not held by that authority. Following reasonable and proportionate searches and consultation with relevant personnel, AirNav Ireland has determined that the information does not exist or is not held by AirNav Ireland corresponding to the information sought, namely; AirNav Ireland does not hold records of flights deviating from a published SID that have been referred or forwarded by the Dublin Airport Authority plc (the “daa”).

The AIE Regulations provide for a right of access to environmental information held by a public body, they do not require a public body to create records where none exist.

Accordingly, and in line with Regulation 7(5) of the AIE Regulations, AirNav Ireland is informing you that the information requested does not exist and is not held by AirNav Ireland.

1.2 A summary of the actions taken by AirNav Ireland in response to these referrals. I am not requesting individual case files. I am requesting: (a) the total number of referrals that resulted in an investigation by AirNav; (b) the total number that resulted in any corrective action; (c) the total number where an outcome was communicated back to daa; (d) the total number where an outcome was communicated to the original complainant.

For the reasons set out at paragraph 1.1 above, AirNav Ireland is relying on Regulation 7(5) of the AIE Regulations in respect of this part of your request. Following reasonable and proportionate searches and consultation with relevant personnel, AirNav Ireland has determined that the information does not exist or is not held by AirNav Ireland corresponding to the information sought.

For clarity, the daa does not refer flights deviating from a published SID to AirNav Ireland, therefore the following information does not exist or is not held by AirNav Ireland:

- (a) the total number of referrals that resulted in an investigation by AirNav Ireland;
- (b) the total number that resulted in any corrective action;
- (c) the total number where an outcome was communicated back to the daa; or

(d) the total number where an outcome was communicated to the original complainant. Accordingly, under Regulation 7(5) of the AIE Regulations, the information does not exist or is not held by AirNav Ireland.

1.3 Any protocol, procedure, memorandum of understanding, or agreement between AirNav Ireland and daa governing the referral of off-track flights, including the respective responsibilities of each party for investigation and corrective action.

For the reasons set out at paragraph 1.1 above, AirNav Ireland is relying on Regulation 7(5) of the AIE Regulations in respect of this part of your request. Following reasonable and proportionate searches and consultation with relevant personnel, AirNav Ireland has determined that the information does not exist or is not held by AirNav Ireland corresponding to the information sought.

For clarity, AirNav Ireland holds no protocol, procedure, memorandum of understanding or agreement with the daa governing the referral of flights deviating from a published SID, including respective responsibilities for investigation or corrective action. No such arrangement exists, as the daa does not refer published SID deviations to AirNav Ireland.

Accordingly, under Regulation 7(5), the information does not exist or is not held.

1.4 Any internal analysis, report, or briefing note prepared by AirNav Ireland on the pattern, frequency, or causes of off-track departures from any runway at Dublin Airport since 1 August 2022.

For the reasons set out at paragraph 1.1 above AirNav Ireland is relying on Regulation 7(5) of the AIE Regulations in respect of this part of your request. Following reasonable and proportionate searches and consultation with relevant personnel, AirNav Ireland has determined that the information does not exist or is not held by AirNav Ireland corresponding to the information sought.

For clarity, AirNav Ireland does not hold any internal analysis, report or briefing note analysing the pattern, frequency or causes of flights deviating from a published SID at Dublin Airport. Accordingly, under Regulation 7(5) of the AIE Regulations, the information does not exist or is not held by AirNav Ireland.

1.5 A description of the corrective actions available to AirNav Ireland when an off-track referral is received (for example: communication with the airline operator, amendment to ATC procedures, notification to the IAA), and which of these have been used since 1 August 2022.

For the reasons set out at paragraph 1.1 above, AirNav Ireland is relying on Regulation 7(5) of the AIE Regulations in respect of this part of your request. Following reasonable and proportionate searches and consultation with relevant personnel, AirNav Ireland has determined that the information does not exist or is not held by AirNav Ireland corresponding to the information sought.

Accordingly, under Regulation 7(5) of the AIE Regulations, the information requested does not exist or is not held by AirNav Ireland.

For completeness only, where an aviation safety occurrence arises, it is managed through AirNav Ireland's approved Safety Management System and addressed on a case-by-case basis in accordance with applicable aviation safety legislation.

2. Rights to Seek a Review

AirNav Ireland recognises the statutory right of requesters to seek a review or appeal of decisions made under the AIE Regulations.

A requester may seek a review where they are dissatisfied with a decision, including a decision to refuse access to records (in whole or in part), to grant access in a particular form or manner, to impose a fee, to extend a statutory timeframe, or where a decision has not issued within the time limits provided for in the relevant legislation (a deemed refusal).

2.1 Internal Review – Access to Information on the Environment

Under Article 11 of the AIE Regulations, a requester has the right to seek an internal review of an AIE decision within one month of the date of receipt of the original decision or the date on which a decision should have been made.

An internal review under the AIE Regulations involves a complete reconsideration of the matter by a member of staff senior to the original decision-maker, who may affirm, vary or annul the original decision. AirNav Ireland will notify the requester in writing of the outcome of the internal review within one month of receipt of the request. The notification will state the decision reached, give reasons for the decision, and inform the requester of their right of appeal to the Commissioner for Environmental Information, including the applicable time limits.

2.2 Appeal to the Commissioner for Environmental Information

Following the completion of an internal review, or where AirNav Ireland fails to issue a review decision within the statutory timeframe, a requester has the right to appeal the matter to the Commissioner for Environmental Information under Article 12 of the AIE Regulations. An appeal must be initiated within one month of receipt of the internal review decision, or within one month of the date on which the decision should have been notified.

Should you wish to discuss the above, please contact me at aie@airnav.ie.

Yours sincerely,
Deirdre Forrest
AIE Officer
AirNav Ireland