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Peter Kearney, CEO
AirNav Ireland
The Times Building
11-12 D'Olier Street
Dublin 2, D02 T449

Re: Request for Documentation and Clarification Regarding Analysis of RWY28L Missed Approach and RWY28R SID Proposal

cc: Minister Darragh O'Brien (Transport & Environment)
Ethna Brogan (Director General Civil Aviation)
Gillian Toole TD, Darren O'Rourke TD, Minister Helen McEntee, Minister Thomas Byrne
Louise O'Reilly TD, Robert O'Donoghue TD, Grace Boland TD

Dear Mr Kearney,

I am writing to formally request the work product resulting from AirNav Ireland's analysis of the proposal we submitted concerning the modification of the RWY28L missed approach and the RWY28R Standard Instrument Departure (SID).

According to public statements made by Mr. Kenny Jacobs, CEO of daa – including before the Oireachtas Transport Committee – AirNav staff undertook a detailed analysis of our proposal but were unable to arrive at a conclusion beyond restating that Instrument Flight Procedures are “complex and regulated.”

We note that this analysis took place over a five-month period. Accordingly, we request that AirNav provide the following:

1. All work products associated with this analysis, including internal reports, briefings, and communications;
2. Any modelling, simulations, or technical assessments that were conducted;
3. A summary of conclusions reached – or an explanation of why a definitive conclusion could not be produced following five months of work.

As background to this request, it is now publicly acknowledged that daa has breached its planning permission in relation to the operation of the North Runway. Given AirNav's central role in designing, approving, and implementing the flight procedures currently in use –

including retention of the legacy 28L missed approach and development of the RWY28R SID – we wish to understand what responsibility, if any, AirNav may bear in relation to that breach. We would appreciate your comments on whether your organization considers itself to have had any regulatory or advisory duty to ensure compliance with an aerodrome’s planning conditions, and whether that duty was fulfilled.

The daa has repeatedly stated that the flight paths in question were “designed by experts,” and we understand AirNav has previously accepted that, aside from the final procedural documentation produced by ASAP in Bratislava, the development of the 28R SID and associated routing was carried out by IAA-ANSP (now AirNav Ireland). We therefore request that you provide:

- A list of the personnel responsible for this work;
- Their qualifications, expertise, and experience that support their designation as “experts” in the field of aerodrome design.

Finally, while we understand that while only the daa, as the aerodrome operator, can initiate changes to approach and departure procedures, that AirNav’s analysis may have been conducted under “devolved responsibility” in your capacity as the national Air Navigation Service Provider and thus a public body. If this understanding is incorrect, and AirNav was engaged by daa as a private subcontractor, we would appreciate clarification, including details of the contractual and legal basis for your engagement.

We thank you in advance for your cooperation and look forward to your response.

Regards,

Gareth O’Brien BE (Civil) MSc
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