

daa cuideachta pho bli theoranta
Príomhoifig: Aerfort Átha Cliath,
Co.Bhaile Átha Cliath, Éire

T: 353-1-814-1111
F. 353-1-814-4120
www.daa.ie

daa public limited company
Head Office: Dublin Airport,
Co Dublin, Ireland



Department of the Environment, Climate and Communications
Government Buildings
Newtown Road
Co. Wexford
Y35 AP90

Date: 16th January 2021

Dear Sir/Madam,

Re: Public consultation on the Review of the Access to Information on the Environment (AIE) Regulations 2007-2018

daa welcomes the opportunity to make a submission to the Review of the Access to Information on the Environment (AIE) Regulations 2007-2018.

Q1 What, in your opinion, are the positive benefits of the AIE Regulations?

daa is of the opinion that the fundamentals of the AIE Regulations are beneficial and transparency on environmental information is paramount. daa is transparent in providing access to environmental information on daa website and our regulators website. Our continuous air quality monitoring station data is available to view on the EPA website. We publish monthly noise reports and quarterly air quality reports for the public to access. We also provide updates on our surface water monitoring to our community groups on a quarterly basis.

An Bord Stiúirtheoirí | Board of Directors: Basil Geoghegan - Cathaoirleach/Chairman, Ray Gammell, Marie Joyce, Patricia King, Paul Mehlhorn, Karen Morton, Eric Nolan, Joseph O'Sullivan, Risteard Sheridan, Denis Smyth, Dalton Phillips –
Príomhfheidhmeannach/Chief Executive

Oifig Chláraithe: Aerfort Bhaile Átha Cliath, Co. Bhaile Átha Cliath. Uimhir Chláraithe: 9401 Éire
Registered Office: Dublin Airport, Co. Dublin. Registered Number: 9401 Ireland

Q2 Should any specific part of the Regulations be amended?

While daa agrees with and supports the release of environmental information, the description of environmental information set out in section 3 of the regulations is very broad. This can result in complex and lengthy requests for information. daa recommends the description of environmental information is reviewed to provide clarity on the scope of information to be provided. With that, daa also recommends an extension of 30-day response timelines due to the broad scope of information that has to be gathered and reviewed in order to respond to requests of information.

The current regulations under Section 9, do not explicitly provide exemptions for scope of works that form part of a statutory planning process, where information which in due course would be made available as part a submitted planning application. daa believes that the regulations, should grant an exemption for documentation that is forming part of a planning application, therefore, not undermining the planning process.

Q3 Any other comments on the existing AIE Regulations and their implementation of the AIE Directive 2003/4/EC?

The regulations as they stand fail to provide a mechanism for handling vexatious requests and therefore there is potential for a misuse of the process. daa recommends the right to access information conveyed under the public consultation is protected by adopting measures to ensure legitimate requests are safeguarded and prioritised. While there is a mechanism for applying charges to retrieve data, daa believes this should be strengthened and there should be a minimum standard charge applicable to all requests.

This concludes our comments. As a key stakeholder, Dublin Airport would welcome any opportunity to further discuss the recommendations made in this submission. In the interim however, please do not hesitate to contact us should you have any queries.

Yours faithfully,


AIE Officer