

Summer 2023 Coordination Parameters at Dublin Airport



20th September 2022

RE: Summer 2023 Coordination Parameters at Dublin Airport

To Whom it may Concern,

FTA Ireland (FTAI) is a not-for-profit membership trade association for the Irish freight, passenger and logistics industries. Established in Ireland in 2010, we are wholly owned and governed by our members and act solely in advancing their best interests. FTAI represents some of the largest freight distribution logistics and passenger operators in Ireland, with more than 25,000 employees.

FTA Ireland welcome the draft publication of Summer 2023 coordination parameters at Dublin Airport and we are making this submission to recommend that the draft proposals are supported in the final publication. In addition, we also want to take this opportunity to highlight the importance of express integrated cargo services to the Irish Economy and reiterate that the summer 2023 slot allocation as proposed meets our requirements (as it replicates summer 2022). Air freight make a considerable contribution to the Irish economy – cargo night flying in particular supports €1.1 billion in GDP and 15,000 jobs.¹

Critical to a continued and efficient air freight service for Ireland, is night flying. Freight flown at night accounts for 38% of the total freight volumes at Dublin airport and around 63% of night air cargo is transported by express freight operators primarily shipping sensitive goods. Operating during the night hours is absolutely essential, as it enables deliveries to occur at the start of the working day, therefore maximising productivity for thousands of organisations across Ireland. However, planning conditions No. 3(d) and No. 5 of the 2007 North Runway Planning Permission as they currently stand, are not conducive to this activity. In fact, if implemented, they will significantly and, to the detriment of the Irish supply chain and economy, impact on air freight services to Ireland. Moreover, it is not demonstrated that such implementation of the two planning conditions would be consistent with Irish obligations under European Directive (EC) 2002/30 and the subsequent Regulation (EC) 598/2014 that replaced it. Neither would it be consistent with the obligations of the Government of Ireland under the U.S.-EU Air Transport Agreement (ATA) with regards to U.S. carriers operating in Dublin.

We would like to make the following in support of the proposed slot allocation for Summer 2023

1. FTA Ireland welcome the proposal to replicate summer 2022 slots
2. Air cargo and particularly night flying accommodates the following:
 - Enables trading relationships
 - Makes Ireland more attractive place to do business
 - Supports advanced logistics and supply chain functions
 - Means Irish based companies can provide the highest levels of customer care and after sales service

¹ [Air-Cargo-Night-Flying-FINAL.pdf \(ftai.ie\)](#)

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As an island on the periphery of Europe, we are reliant on effective and efficient multi-modal connectivity. Dedicated Air freight integrators allow Irish businesses to send time-sensitive and/or critical manufacturing components, perishable produce, urgent consumer goods, time critical medical or pharmaceutical products, or even financial, legal or business documents over night to arrive the next day in European and global markets.

Express cargo services are about mission critical timeframes, fine margins, and speed. Any changes to slot allocations will have a negative impact on air cargo services and ultimately have a negative impact for Ireland's competitiveness and global reputation.

We appreciate your consideration of this submission.

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CEO

Freight Transport Association Ireland

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