



Car Rental Council of Ireland

I am writing in response to the Commission for Aviation Regulation's Draft Determination, on behalf of the Car Rental Council of Ireland. The Car Rental Council of Ireland is the representative trade organisation for the car rental industry in Ireland. The Council is a constituent member of the Irish Tourist Industry Confederation. It is recognised by Ireland's official agencies Fáilte Ireland and Tourism Ireland and contributes to the development of national tourism policies.

Car rental penetration rates at Dublin airport (car rental agreements v passenger numbers) remained consistent during 2012 and 2013. It is therefore reasonable to assume that the forecasted growth in passenger numbers at Dublin airport will reflect in continued growth in the demand for car rental services between 2015 and 2019.

However a draft National Tourism Policy for Ireland published by the Government in July 2014 sets targets by 2025 for tourism revenues of €5 billion in real terms (i.e. in 2014 prices), and employment in the sector of 250,000. To effectively compete in a highly competitive and dynamic global tourism marketplace, Ireland will need an insightful investment policy for the sector. With the level of investment in tourism marketing consequent on these targets and the significant role car rental plays in the regional spread of tourism, the car rental industry expects that the penetration rates at Dublin Airport will significantly exceed the current levels during the next five years.

To ensure a modern, competitive and productive car rental sector to meet the growth in demand, significant investment in new and improved visitor experiences is required. Therefore it is essential that the regulator seeks to support and facilitate growth in the car rental sector at the airport through its regulatory framework.

While the Car Rental Council welcomes the allowance of part of the proposed capital expenditure in the draft determination, it represents a cut of 21%. In recognition of the Government's tourism policy the full capital amount proposed should be permitted in order to provide appropriate and adequate facilities to accommodate the forecasted growth in the car rental industry. Furthermore, recognising Dublin airport's critical role in tourism, all facility and environmental investment plans in the airport facilities that reduce congestion, improve efficiency and the overall visitor experience should be given greater consideration in the Commission's final regulatory decision.

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Chief Executive
July 2014