



**Submission to the Commission for Aviation Regulation on the
Draft Decision on an Interim Review of the 2019 Determination (CP3/2022)**

INTRODUCTION

The Car Rental Council represents the major car rental companies in Ireland (see Appendix 1) and is an active member organisation of the Irish Tourism Industry Confederation.

The strategic importance of the car rental industry to the tourism and hospitality sector in Ireland has been widely acknowledged in the last year.

“Car hire plays an important role in facilitating tourism in Ireland as 32% of holidaymakers visiting Ireland hired a car in 2019”

REF: Indecon report to Fáilte Ireland “An Examination of Car Rental Taxation and Tourism in Ireland” August 2021

“The sector is an important part of wider tourism infrastructure.” “Tourists hiring cars are more likely than other visitors to visit regional locations. For many regional and rural locations car hire tourists represent a majority of visitors.” Ref: Indecon Report

“People who rent cars in Ireland spend longer in Ireland. They spend more money in Ireland; they visit places like Wexford, Kerry, all around the country and they require rental cars to do that.”

Paul Kelly, chief executive of Fáilte Ireland.

REF: <https://www.thetimes.co.uk/article/cheaper-to-buy-a-car-than---one-in-ireland-8krqf3hbz?t=ie> (subscription article, 16th June 2022)

The car rental industry:

- Provides substantial annual investment in new vehicles, a critical component in “greening” Ireland’s fleet of cars. In 2019, 16% of all new registrations were registered to the car rental fleet.
- Provides a steady stream of newer cars into Ireland’s second-hand car market. In 2019, 95% of the car rental fleet was purchased within the previous three years, with most cars reaching their fourth year being sold into the second hand market.

These two values of the car rental fleet are now critical given the Governments ambitious plans to electrify the national car fleet.

In addition, the car rental industry:

- Provides consumers with mobility options as an alternative to car ownership including shared transport options
- Provides essential car rental services to international business travellers
- Provides alternative fleet options to companies and public agencies
- Provides car replacement services to the vehicle repair industry

The facilities at Dublin Airport are important to the car rental sector in that 80% of tourism car rentals are initially rented at Dublin Airport. Equally, the ongoing development of top-class car rental

facilities at Dublin Airport is essential to match the passenger growth projections and ambitions of a world class international airport.

SUBMISSION

The Car Rental Council welcomes the following elements of the Dublin Airport Capital Investment Plan (CIP):

- CIP.20.04.002 – Car Hire Consolidation Centre
- CIP.20.04.005 – Eastlands Long Term Car Park
- CIP.20.09.001 – Airport Charging

We urge the Commission to do everything in its power to ensure that these projects are implemented without delay and that the planning and scheduling of the projects are subject to ongoing consultation with car rental stakeholders and are flexible to reflect the evolving needs and strategies of the sector, particularly on elements which are evolving very rapidly such as EV charging.

Peter Boland
CEO
Car Rental Council of Ireland
16th September 2022

APPENDIX 1

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 Failte Ireland and Tourism Ireland Ltd and contributes to the development of national tourism policies. Membership of the Council is open to companies operating a year-round car rental business with a minimum fleet size of thirty vehicles and is subject to acceptance of and compliance with the Council's constitution and code of practice.

Our current membership includes:

Avis/Budget
Enterprise Rent a Car
Europcar
Hertz
Motability Ireland
Sixt

Website: <https://www.carrentalcouncil.ie/>