

Irish Exporters Association response to Airport Charges Draft Decision Paper 31st July 2014.

The Irish Exporters Association makes the following response to the proposed price cap 2015 - 2019 as outlined in the Commission's paper of May 29th 2014.

"The development of new routes and services, particularly to new and emerging markets" is a key component of the Government's draft National Aviation Policy which is strongly supported by the IEA and which does not seem to be reflected in the Draft Determination.

While just 1% of Irish export volume is by air, this represents about 33% of our export value. Developing direct routes to the BRIC and other emerging and growth markets is a critically important means of establishing trade links with these countries - countries with the highest growth rates and hence of great interest to Irish exporters.

The Irish Exporters Association recently launched the Latin America Trade Forum with the DFAT and Enterprise Ireland. In addition, our Asia Trade Forum has gathered significant interest amongst our indigenous exporting SMEs looking to expand and grow their businesses in countries such as Malaysia and India.

Furthermore, the government, through the IDA, are trying to attract companies from emerging and growth markets to set up operations in Ireland and in this regard we note that the entire tenor of the draft document is to delay to some indeterminable future date the facilities which would allow such routes to begin.

We would draw to your attention that there is:

- No allowance for runway extension.
- No allowance for facilities for large aircraft (which are the most likely aircraft to serve longer distance routes) either in the terminal building or on the airfield.
- A proposal to increase the trigger for a second longer runway and so delay its delivery.
- No allowance for a new transfers facility. Transfer passengers can support routes which could not be sustained on a point-to-point basis, routes such as San Francisco for example. This is a very attractive route to have available as a direct link, however the commercial viability of this (and other) routes is supported by transfer passengers. If Dublin does not have the facilities to provide a quick and efficient transfer process these passengers will simply chose another airport to transfer through, putting routes at risk.
- We note also that this decision on the transfers facilities appears at odds with the development of Dublin airport as a secondary air route hub.

The refurbishment of Terminal 1 has also not been allowed. The terminal has been in use since the early 1970's and the effects of depreciation and long term usage are visible and

this weakens Dublin Airport's ability to compete in attracting new airlines to Dublin, particularly when in competition with airports in the UK.

Our interests as the Irish Exporters Association lie in having the largest network of destinations available from Dublin in order to increase the markets we can target and give support to our exporting companies. One airline alone being attracted to Dublin for even a single flight per week opens up opportunities which would otherwise not exist.

We therefore believe that the appropriate time for the refurbishment of T1 has arrived so that Ireland will maintain its position as a leading country to conduct business.

The IEA see a large number of international companies manage their global supply chain operation from Ireland. As well as facilitating the physical transport of goods, Dublin Airport is also very important in facilitating business travel and trade development. It is critical that the airport provides a fast and efficient service with frequent flights available to the main business cities and cargo hubs

In the early morning, passing through security can be a slow process and we are concerned that the following proposals contained in the Draft Determination:

- To refuse capex for screening equipment,
- To refuse capex for equipment which would speed up the security lanes (new tray system),
- To reduce the number of daa staff,

may result in longer delays at security, which is not a positive development for the enhancement of trade links and should be avoided through appropriate funding.