

ALL OTHER CONTENT IN CONSULTATION FOR INTERIM REVIEW

In my opinion a far more wide ranging review is required than is suggested by CAR. Fundamentally, any review has to forget about criteria used for evaluation of passenger charges in the past and consider the future. Global heating considerations are going to predominate. We have seen that industry has responded to an extent and has cut its carbon emissions. Power generation has also substantially reduced its carbon emissions. Aviation has not. In fact, with a total disregard to Ireland's commitment to the Paris Climate Change Accord the aviation industry in Ireland is planning to increase its carbon emissions by 160% between the carbon emissions of 2006 and the carbon emissions in 2030.

Comments on daa submission to CAR on passenger charges.

There is certainly a platform for a fundamental rethink of the regulatory framework as applied to Dublin airport; but it is not covid. Covid will pass. The danger caused by aviation operations to Climate Change and Global Heating will not pass. IAA/CAR must ensure that daa vision is;

LOOK ATER THE EARTH

IAA/CAR must ensure that daa accepts that, while only one billion of the earth's population has flown, the effects of aviation activities are suffered by all 9 billion of the earth's inhabitants. Future regulatory framework and passenger charges allowed to daa must be based on daa adopting the following mission statement:

"daa MISSION IS TO MINIMISE THE EFFECT OF OUR AIRPORT OPERATIONS ON CLIMATE CHANGE.

Allowable passenger charges should be based, inter alia, on daa accomplishing its mission as follows:

- a) Reducing fuel oil supplies to Dublin airport to the level that pertained in 2006. This level is to be reviewed at 10 yearly intervals until a non polluting means of propelling aircraft is available.

This can be done without impacting strategic operations by minimising the number of transit passengers and frequent fliers.

This can be achieved by abandoning the concept of a hub airport.

- b) Presenting a programme for the improvement of passenger comfort in proceeding through the airport.
This should include transport to terminals; space and sufficient seating at departure lounges; improving the security area; providing indoor boarding of all aircraft in two years.
50% of retail space should be closed and reassigned to passenger comfort e.g. seating.
- c) Earning more money from their valuable slots.
This can be done by charging airlines more for aircraft movements. There is no point in daa having market power if they are not going to use it.
- d) daa appear to have an excessive budget for the production of economic evaluations, quoting statistics generated by the aviation industry, including IATA, to demonstrate that Ireland's economy is "vitally" dependent on the "connectivity" provided by the aviation industry for this "island nation". Covid 19 disproved all this. CAR should disallow all daa expenditure on aviation consultants and PR and marketing consultants and ensure that it is diverted to a more useful purpose.
- e) daa has appealed planning conditions 3d) and 5 – fifteen years after the permission was granted. This appeal was occasioned by a change in strategy long after planning permission for the runway was granted. The costs incurred by daa in this appeal should not be allowed by CAR in determining the passenger charge.
- f) daa has recently sought to have a lien on the lands at Dublin airport overturned in the courts. daa should have known about this lien 15 years ago during the planning stage of the 4th runway and the court costs associated with the overturn of this lien should not be allowed to daa.

Oversight

2.1.4 Light Regulation

The word "light" when combined with regulation is an anathema since the financial crash. Light regulation should not be considered.

2.1.5 Financial Issues and Covid 19

Financial issues at the airport existed before covid 19. See Fora of September 2019.

Dublin airport is a "city" airport. Unlike Gatwick and Stansted it can now be said, with the expansion of Dublin, to literally be in the centre of Dublin. It will soon be designated a "City" airport like London City airport and be subject to the same operational conditions. It should be renamed "Dublin City Airport" as soon as possible.