



On behalf of Portmarnock Community Association we wish to put forward the following points regarding the review that the Commission for Aviation Regulation is carrying out, in relation to the airport determining maximum airport charges.

- 1) Aer Rianta is engaging in wasteful expenditure regarding the provision of a 4th runway at Dublin Airport.
- 2) Any increase in landing charges granted at Dublin Airport would facilitate Aer Rianta in constructing this additional unneeded runway.
- 3) Efficiency on the present main runway is low compared with e.g. Gatwick. Therefore capital expenditure investment in a new runway at Dublin is unnecessary, environmentally damaging and would encourage 'gold plating' at Dublin Airport. Economic Regulation must not allow income from airport charges to be used in this way.
- 4) While the Portmarnock Community Association are objecting to the proposed new runway on the grounds of environment, health, safety, noise, pollution and negative impact on the community of Portmarnock, we wish to point out that the impact on Airlines of another major runway would be to push up landing charges.
- 5) There is little if any support for this runway proposal from Aer Rianta's airline customers.
- 6) The community of Portmarnock, due to the flight-path of runway 10/28, already suffers noise pollution and also suffers from the lack of a night curfew at Dublin Airport such as exists at other airports e.g. Heathrow.
- 7) As Dublin Airport is severely congested a framework, which would cap it's existing level of business, would be appropriate. Charges should be set so as to favor expansion at Cork and Shannon Airport, both of which have abundant capacity or in the development of a new purpose built airport. The regulator would thus support the National Policy of decentralization.
- 8) The application of the Kyoto Protocol and National plan for Climate Control means the introduction of taxes or levies on greenhouse gas emitters including airports and airlines.  
\* These environmental considerations and their cost implications should be included in this review.
- 9) The pollution of air, water, noise and light resulting from the operation at the airport needs to be factored into charges. The 'polluter pays principle' as provided for in EU Action Plan 5 and 6 should be adopted. There is a requirement not just for monitoring of these effects but of reducing them to a level acceptable to an independent assessor.
- 10) The context of this submission confined to 'any Irish airport with more than one million passengers' reduces the scope for the development of regional airports.

**We look forward to discussing this matter at public consultation**

## **Note**

\* From International Civil Aviation Organisation charged by the UN with providing technical expertise to assist in preparing certain aspects of the Special Report on Aviation and the Global Atmosphere. <http://www.icao.int/>

- The Kyoto Protocol requires countries to reduce their collective emissions, including aviation, of greenhouse gases by approximately 5 per cent by the period 2008-2012. Preliminary analysis shows that in addressing global problems, a route or fuel levy would be most effective, while an airport levy would be most effective in reducing local emission problems.
- Once aviation emissions have been quantified, an important distinction is whether the emissions are domestic or international. For domestic flights, the emissions are considered to be part of the national inventory of the country concerned. However, for international flights, the difficult question arises as to how to allocate the emissions (referred to as "emissions from aviation bunker fuels" in UNFCCC terminology) to national inventories. <http://www.icao.int/icao/en/env/taxes.htm>