Aer Lingus

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July 2, 2024

Re: Draft Decision in relation to a complaint received on airport charges at Dublin Airport (the "Draft Decision").

Dear Adrian,

We refer to the above Draft Decision. Aer Lingus welcomes the opportunity to participate in this consultation.

1. Summary of Aer Lingus position

For the reasons set out herein, we believe that the structure of charges is consistent with the ACD, 2011 Regulations and the principles of the Thessaloniki Forum. We are therefore of the firm view that the IAA should not refer the issue of structure of charges back to daa for review or indicate that it may issue a direction if daa does not carry out such a review to its satisfaction.

That is not to say (as outlined below) that we agree with each individual element of the charges, but that, given the overall price cap and daa's desire to price to its limit, the overall structure of charges is reasonable and is non-discriminatory in that it does not favour one business model over another.

As further addressed below Aer Lingus does not support the current Low Emissions Aircraft Discount (LEAD) or Nitrogen Oxide (NOx) charges and we believe their introduction by daa is not justified. However, it is our view that any changes or withdrawal in respect of those charges can be dealt with effectively within the context of the annual airport charges consultation. Accordingly, this submission focuses on the differentiation of the passenger charges between transfer and point to-point passengers, and the structure of the runway movement charges.

2. Structure of airport charges

The structure of airport charges is clearly an issue of vital importance for all airlines operating at Dublin or any other airport. It is well established that there is no universal structure of charges that applies to all airports. The IAA is familiar with different airports setting different levels of charges in accordance with different commercial strategies and pricing structures. The IAA is also well versed in the arguments, reasoning, and policies which ensure that airports are held accountable for their chosen structure of charges, and that such structures comply with the European and national legislation and applicable guidance.

However, as will be made clear in this submission, the IAA has not paid sufficient regard to daa's commercial discretion to determine how its charges best meet its business objectives having regard to the National Aviation Policy for Ireland (the "NAP").

As highlighted by the IAA in the Draft Decision, the 2011 Regulations do not prevent the modulation of airport charges for issues of public and general interest, including environmental issues but provides that the criteria used for such a modulation shall be "relevant, objective and transparent."[1]

In assessing the objectivity of the modulation of airport charges, the two key overarching principles are cost relatedness and the extent to which the pricing structure implements public policy. These two factors are crucial in guiding airport decision-making when setting its structure of charges. As stated above, there is no universal structure of charges, and therefore it is these two principles which, for the most part result in different airports having different charging structures.

In paragraph 3.29 of the Draft Decision the IAA refers to TF Non-Discrimination in that "*A grounding in stated government policy is required in order to justify an element of a charging strategy on the grounds of public or general interest under Article 3*." However, the IAA have put too much emphasis on cost relatedness (notwithstanding that there is ample objective justification based on cost relatedness for the transfer passenger charge ("TPC") TPC and runway charging bands) rather than permitting daa to make charging decisions which are mapped on to public or general interest.

For the reasons outlined below, Aer Lingus considers that the reduced transfer passenger charges and banded runway movement charges are objectively justified based on both cost relatedness and public policy (having regard, in particular, to the policy objectives set out in the NAP).

3. The present structure of charges is not discriminatory

In paragraph 2.25 of the Draft Decision, the IAA states that: *"Ryanair alleges that the [transfer] charge is discriminatory against point-to-point airlines, who are cross-subsidising transfer passengers."* There is no evidence presented to support this statement. The TPC cannot be considered in isolation when assessing whether or not charges are discriminatory but rather the overall charges per passenger payable under the charging structure by carriers of different business models should be considered in the round.

In this regard, we would point out that the overall average cost per passenger incurred by Aer Lingus in respect of aeronautical services at Dublin Airport is [redacted] which clearly indicates that the overall charging structure does not discriminate against point-to-point carriers as is alleged in the complaint. It is worth considering the decision of The Netherlands Competition Authority (NMa) dated 16 December 2009, as reported by the Dutch Authority for

[1] European Parliament and Council of the European Union. *Directive 2009/12/EC on Airport Charges*. Article 3. 2009.

Consumers and Markets (set out below) that the offer of a reduced charge for different types of passengers does not in itself constitute discrimination if it is available to all carriers.

> *"According to the NMa however , the Aviation Act allows for different tariffs for different types of passengers, as long as competition is not impeded. The mere fact that an airline is charged a higher tariff, because of the type of passengers it carries, than other airlines that also carry other types of passengers does not automatically mean it is discriminated against. First, the NMa points out that easyJet has made its own choice of solely focusing on o/d-passengers at Schiphol or at any other airport. Having such a business model has its advantages as well as its disadvantages. Schiphol cannot be held accountable for easyJet's own choice."*[2]

4. Passenger Charges

In paragraph 3.2 of the Draft Decision IAA states that Dublin Airport provided three justifications for offering a discounted charge to transfer passengers, namely:

> *"a) a return transfer passenger will pay four sets of airport charges.*
>
> *b) many transfer passengers do not enter the main terminal facilities and remain airside in a pier environment.*
>
> *c) many capital city airports have a national strategic objective to develop as an inter-continental hub, which requires competing with other airports for transfer passengers."*

For the reasons outlined below, these justifications, meet the requirements of the 2011 Regulations.

Cost relatedness:

Under price cap regulation in general, and under the 2011 Regulations in particular, there is no explicit requirement for each individual tariff within the overall regulated airport charges to be justified based on precise underlying cost calculations.[3] To do so, would impose an intolerable burden on airports and require an increased overhead to carry out the necessary economic analysis.

In the Draft Decision, the IAA confirms that the charges do not necessarily have to be justified on the basis of cost alone.[4] Nevertheless, daa demonstrates in its submissions to the IAA that there are strong cost justifications for its approach to transfer charges. Increased transfer passenger numbers reduce overall charges

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2 Autoriteit Consument & Markt, "NMa Rejects easyJet's Complaint," last modified September 30, 2011, https://www.acm.nl/en/publications/publication/6383/NMa-rejects-easyJets-complaint.

3 European Parliament, *European Airport Charges Directive*, 2020, https://www.europarl.europa.eu/RegData/etudes/BRIE/2020/654202/EPRS_BRI(2020)654202_EN.pdf.

4 Irish Aviation Authority (IAA), *Draft Decision on Airport Charges*, [01.07.2024]. Available at: https://www.iaa.ie/docs/default-source/car-documents/1c-economic-regulation/ryanair-draft-decision_final.pdf?sfvrsn=b648eff3_1

by increasing the number of passengers (i.e. a greater number of regulated passengers for similar Regulatory Asset Base ("RAB") and operating expenditure) and increasing commercial revenue as they move through the terminals and/or piers. In addition, each connecting passenger that uses the CBP facility incurs a charge of €9.20 which supplements daa's commercial revenues which reduce aeronautical charges for all users. It succeeds in doing this by attracting passengers flying via Dublin who would otherwise have travelled via a number of different hubs. This incremental traffic benefits all airlines by resulting in a lower per passenger cap and a more efficient use of the RAB.

In figure 1 of the APC 2024 Clarification Questions daa provided information on which airport facilities are used to serve point-to-point and transfer passengers. It is clear from this information that in terms of allocation of the RAB, operating costs and commercial revenue, transfer passengers require little incremental resource to process.

Furthermore, in March 2024, as part of its submission to Fingal County Council setting out the reasons why transfer passengers should not be counted in the assessment of the 32 passenger cap, daa provided a report titled "Dublin Airport – 2023 Passenger Categorisation Analysis Revision 05 dated 20 March 2024". This report contains a detailed analysis of just how little airport infrastructure transfer passengers can use. For example, on page 27 of that report, it states that "*An estimated 79.79% of all Pier 4 CBP departing transfer passengers did not enter a Terminal Building during their journey through the Airport*".

Accordingly, there is significant evidence of cost relatedness which objectively justifies the lower TPC. In addition to this cost related justification, the TPC is, as set out below, justified in terms of the public interest due to the NAP, which daa is required to take account of in its charging structure and commercial strategy.

Finally, neither Ryanair nor the IAA has suggested that other discounted charges offered by daa within its charging structure need to be subject to a full cost related analysis. For example, no reference is made to the discounts available during the winter season together with growth / new route incentive schemes where there is no material difference in the related costs. Accordingly, there is well established acceptance of daa's discretion to charge other than for reasons of cost relatedness.

<u>National Aviation Policy / public interest</u>

As is acknowledged by the IAA in the Draft Decision, the development of Dublin Airport as a hub is underpinned by the NAP the principal goals of which are:

- *"to enhance Ireland's connectivity by ensuring safe, secure and competitive access responsive to the needs of business, tourism and consumers;*

- *to foster the growth of aviation enterprises in Ireland to support job creation and position Ireland as a recognised global leader in aviation;*
- *and to maximise the contribution of the aviation sector to Ireland's economic growth and development."*[5]

One of the key actions in the NAP refers to developing Dublin as a vibrant hub, competing effectively with the UK and other European airports for the expanding global aviation services market. It notes that a hub combines local passengers with transfer passengers enabling airlines to operate services to more destinations and more frequently than could be supported by local demand alone.

The role that Dublin Airport plays in the NAP framework is to provide a platform for a competitive aviation market. That includes encouraging airlines with varying business models to operate to and from Dublin Airport. Ireland's aviation industry will not continue to grow and evolve were the regulatory regime to favour one business model over another.

Whilst many carriers (including Aer Lingus) provide point-to-point services to/from Dublin Airport, Aer Lingus and other carriers (i.e. any carrier that wishes to – including Ryanair) also offer passengers and freight forwarders hubbing and on-line connecting services. This adds connectivity and expands the mix of users of the airport which stimulates activity. That, in turn, adds value to the Irish economy.

The NAP constitutes the "public and general interest" serving as an objective justification under Regulation 6(1)(d) of the 2011 Regulations.

There are two further points to bear in mind. Firstly, a different rate for transfer passengers, as opposed to point-to-point passengers, is normal practice among similar airports. Those charges vary by airport considerably. This may be due to a number of factors, including (of particular relevance) the importance which the airport (and the national aviation strategy) places on transfer passengers and the building (and preserving) of a hub airport facility.

For airports such as Istanbul (IST), Singapore (SIN) and Abu Dhabi (AUH), the relevant national policy is to 'punch above their weight' by discounting the charges for transfer passengers by as much as, or more than, Dublin Airport. For an airport of the size and location of Dublin, and in the competitive environment in which airlines operating a hub model from Dublin Airport find themselves, more nuanced considerations apply. IST and SIN have huge national carriers with long-haul hub and spoke operations at the core of their business plans. Similar to Dublin Airport which competes with London Heathrow, AUH has a smaller national carrier (i.e. Etihad) and is close to a very large competition hub airport with a very large national carrier (i.e. Dubai (DXB)) and also offers US pre-clearance as a

[5] Department of Transport, Tourism and Sport, Ireland. *National Aviation Policy*. Dublin: Government of Ireland, [August 2015]. Available at: https://assets.gov.ie/14197/9b90e1b8a47d47c8950ead2492a54030.pdf, page 7

competitive differentiator. As a result, AUH uses market driven levels of discount to enable it the airlines operating a hub from its infrastructure to compete. In implementing the NAP, Dublin Airport recognises the need to be relevant in the market and support policy implementation through price incentivisation.

Secondly, it is normal for airports which are in a position to do so, to encourage both connecting hub operations and point-to-point operations as two separate, parallel, business models at the airport. The support of both models offers inherent risk mitigation to the airport as it reduces dependency on local demand. This is particularly important for Dublin Airport given the small size of the Irish market. Airlines that compete for transfer traffic need a pricing policy enabling them to do so. This cannot be reduced to 'spreadsheet accounting' driven entirely by insisting that every passengers must pay the same. To do so, would result in a single rate per passenger charge (i.e. the regulated cap), with no mechanism for daa to drive is own business objectives. For example, there would be no new route incentive, no differentiation between contact and remote stands, no seasonal incentives, no hub incentive and cargo operators would arguably fly for free.

As noted above, there are good policy and economic reasons for the current rate. The key issue is at what level does the discount which daa applies ensure that the hub operating from Dublin airport infrastructure remains competitive with the numerous formidable hubs in Europe and elsewhere. This is a finely balanced decision and should be a matter for daa alone to determine (provided always such decision making is grounded in the public interest).

Plotting the transfer passenger share of several other airports against the discounting of transfer charges (refer to tables 3 and 4 in the appendices) reveals that Dublin Airport, despite the level of TPC discount it offers, has the lowest transfer share among its peers. Similar to Dublin, other airports also discount transfer charges to promote hub connectivity, such as Copenhagen (56%), Zurich (62%), and Rome FCO (65% and 100% for domestic-to-domestic transfers) [2024 rates].

Raising the TPC would make airlines operating a hub model from Dublin Airport less competitive and be contrary to the aim of the NAP. Raising the charge would in fact induce a downward spiral as fewer passengers leads to fewer flights compromising further flights as operations become less and less competitive.

The economics of long-haul, wide-body routes depend on connecting passenger flows. The number of 'spokes' that feed into a hub is a fundamental driver. Many routes to and from Dublin would be unsustainable without the ability to hub and to blend passengers to and from various destinations. The high share of transfer passengers on Aer Lingus' US routes demonstrate that many long-haul routes would not be viable otherwise. If those routes become unsustainable Ireland's connectivity would be greatly reduced.

[redacted] The strategic role of Dublin Airport as a connecting hub is critical not only for Aer Lingus but also for sustaining these international routes that contribute to the overall connectivity and economic benefits for Ireland.

The TPC allows Aer Lingus to price these routes competitively, which in turn keeps the routes viable, bringing more overall traffic to Dublin, which benefits Ireland in line with the NAP. It also generates traffic into and out of Dublin, which in turn can benefit other carriers, including Ryanair. Passengers stopping over in Dublin and indeed around the rest of Ireland add to the Irish economy. Whilst there are no figures on the number of visitors to Ireland who then 'self-connect' to other places in Europe, anecdotally, there are such passengers. Many will continue their journey on carriers such as Ryanair, or other carriers, of course.

By making appropriate investments in product development and integrating connectivity into their business models, airlines currently not benefiting from transfer discounts could potentially benefit in the future, as these discounts are universally accessible.

Aer Lingus championed the collocation of the IAG group airlines to Terminal 2, solidifying the hub proposition and demonstrating the effectiveness of daa's airport strategy in attracting further investments. This strategic move enhances the customer experience by providing a seamless and convenient travel process while driving substantial operational and cost efficiencies for Dublin Airport. This and other investments made by Aer Lingus and IAG in the Dublin hub proposition, underpinned by the current structure of charges, is crucial for maintaining a competitive and attractive hub. The IAA's potential decision to alter the charging structure based on Ryanair's unsubstantiated claim threatens to undermine economic benefits achieved through this recent development.

The InterVistas economic impact study, commissioned by daa, puts the value of this 'catalytic'[6] impact at more than €5.7 billion in 2022. InterVistas forecasts this to grow over the next twenty-five years[7]. Assuming unconstrained growth, the gross added value to the Irish economy would be staggering – 55 million passengers contributing more than €15.8 billion (Appendix 5).

We further note that in paragraph 3.41 of the Draft Decision the IAA takes exception to the slight variation in percentage terms of the TFC as against other charges. While we acknowledge such variation, we point out that if the Covid

[6] By catalytic effects we mean the wider impacts on employment and income generated by the airport via, amongst other mechanisms, improving productivity, enhancing competition, promoting inward investment and tourism.

[7] InterVistas Consulting Inc., *Economic Impact Study on Dublin Airport*, 2022.

years are not considered then the actual variation in the rate is relatively small. Also, while the percentage varies, the fee itself is less volatile. Similar to other commercial pricing decisions, it is possible that daa were keen to have a notable headline transfer rate which it could promote as part of its hub strategy to airlines as part of its commercial objectives which are underpinned by legitimate public interest.

5. Runway charges

For the reasons outlined below, these charges meet the requirements of the 2011 Regulations relating to transparency, relevance and objectivity.

Cost relatedness

The IAA determined that the proposed discount for Band 2 aircraft failed to meet the thresholds of transparency, relevance, and objectivity, arguing that a) daa has not justified either the rationale for a discount or the percentage of discount, and in so doing, failed to comply with regulations 6 (public/general interest) or 11 (threshold for cost-related or other justification); b) daa's rationale that a lower runway charge for Band 2 aircraft is needed to help offset the higher turnaround cost is irrelevant; and c) daa can consider an alternative tariff driver to MTOW and/or leverage other aspects of the charging strategy to incentivize long-haul traffic.

The IAA has asked daa to justify its rationale for discounting Band 2 aircraft and ensure that there is no double-counting with other incentives. Importantly, IAA acknowledges that cost-relatedness is not the only basis for a differentiated charge, disagreeing with Ryanair's argument.

Aer Lingus disagrees with the IAA's decision for various reasons. Firstly, there is the question of usage of airport resources. While Band 2 aircraft require more airport infrastructure than Band 1 aircraft, such as larger aprons and hold rooms, the additional infrastructure is not proportional to the higher MTOW (and in any event is recovered proportionally under passenger charges). For instance, an A330-300 weighs nearly three times more than a B737 MAX 8 but does not utilise three times more airport capacity. Importantly, a landing or departure by either aircraft Band utilizes a single slot. Applying the same charge per MTOW would clearly result in over-charging Band 2 aircraft, thus disincentivising their use.

Secondly, it is common industry practice to charge for runway usage based on aircraft movements (and very often, although not always, using MTOW as the driver) as this incentivises the most efficient use of aircraft capacity, i.e., it encourages an airline to maximise passengers per movement. daa's runway charge structure benefits a low-cost carrier like Ryanair, which operates high density aircraft with high load factors.

Thirdly, it is important to note that, while the runway charge is calculated based on aircraft size, airlines ultimately transfer the cost burden to passengers via the air fare.

Consequently, it is the effective runway charge per passenger that must be analysed when assessing whether the Band 2 discount is discriminatory. When reviewing on a cost per pax basis, an A330-300 pays 86% more than a 737 MAX 8 on runway charges - see Appendix Table 1 for the detailed analysis. This proves that the proposed charges still favour band 1 aircraft operators and broadly do not discriminate between passengers, independent of the aircraft choice.

Fourthly, as the Band 2 discounts apply to aircraft with weight greater than 136 tonnes, it is not "incentivising" long-haul traffic. It is simply correcting what would otherwise be a large aircraft "penalty". There is no double-counting with other incentives to long-haul air service.

In fact, it could reasonably be argued that all aircraft movements should be charged a single movement charge calculated by dividing the economic value of the runway by the number of slots utilised. Such an approach would likely result in an increase in Ryanair's runway charges and a decrease for Aer Lingus.

Finally and as noted above in relation to the passenger related charges, there are well established differentiated landing charges for winter and summer which have not been questioned by Ryanair or the IAA on the basis of there being no cost justification. In this regard, it is clear that there is no material difference in the cost (in terms of operating costs, infrastructure, or otherwise) of an aircraft landing in the winter than in the summer.

National Aviation Policy / public interest

Band 2 aircraft are critical to objectives of the NAP enabling long-haul routes that benefit the national economy by supporting trade (Band 2 aircraft transport significantly more air cargo than Band 1 aircraft) and inbound tourism, one of the nation's most important revenue and employment drivers. The long-haul routes operated with Band 2 aircraft support Dublin Airport's transfer traffic, which benefits all airport users by spreading the airport operating cost base over a larger number of passengers, and by reducing aeronautical charges thanks to their contribution to the airport's commercial revenues (since Dublin Airport is single till). However, Band 2 aircraft are significantly more expensive to acquire and operate than Band 1 aircraft and represent a major investment. The discount for Band 2 aircraft helps to assure an even playing field and supports investment in these aircraft and the objectives of the NAP.

In summary, Band 2 aircraft are more efficient than Band 1 aircraft in terms of runway utilisation (more passengers per movement) and emissions (lower CO_2 emissions per available seat kilometre), and their increased use should be encouraged through a banded runway movement charge.

Unlike Ryanair, Aer Lingus (and other carriers) transport cargo through Dublin Airport. Heavier widebody aircraft are crucial for facilitating the transport of cargo. Air cargo represents approximately 5% of global cargo volume but accounts for 35% of its total value. Given Ireland's increasingly high-tech economy, flights with cargo capacity from the US, Europe, and other global destinations provide an additional benefit to Dublin Airport's multi-business model. Aer Lingus alone transported [redacted] of air cargo in the past 12 months including [redacted] freight to and from London airports . Encouraging and supporting cargo traffic underscores the advantages of maintaining a diverse operational model at Dublin Airport.

6. Low Emissions Aircraft Discount (LEAD) scheme and Nitrogen Oxide (NOx) charge

Aer Lingus, like many airlines, takes its environmental responsibilities seriously and is actively investing to reduce emissions, through for example: fleet purchases; the use of biofuel; and supporting drives for efficiency in airport and airspace management.

In its response to daa's consultation on aeronautical charges at Dublin airport for 2024-25, Aer Lingus objected to daa's proposal to introduce LEAD and NOx charges, as greenwashing by daa to use the aeronautical charges to burnish its credentials, but that would have no overall environmental benefit. Our arguments are not repeated here, and we refer IAA to the above consultation response (attached for reference). Regardless, any changes to or removal of these charges are appropriately addressed within the context of the annual airport charges consultation.

7. Conclusions

As stated above, Aer Lingus are of the firm view that the IAA should not direct a review of the structure of charges at this time.

At present, there is profound complexity in the Dublin aviation environment (including the 32 mppa cap, likely implementation of night flight quotas, complex airport planning applications and a statutory appeal of the price cap), and that a further distracting review of the structure of charges (outside of the established annual process) is entirely unnecessary.

However, if notwithstanding our position, IAA should nevertheless consider it appropriate to refer the charges back to daa for review, then that the factors below should be part of any such direction:

a) The entire scheme of charges should be referred back for consideration given the nature of the price cap and the consequential impact any adjustments will have to other charges.
b) That there is an independent and accountable economic assessment to validate any changes to the charging structure in respect of the effect it would have on Dublin Airport performing as set out in the NAP, and in particular the impact it would have on the volumes of connecting passengers.
c) That the IAA must direct an appropriate means for daa to provide the airlines with access to comprehensive and transparent data in respect of <u>all</u> relevant issues including valuations under the RAB, OpEx, commercial revenue, incentives, and any

bilateral commercial agreements in respect of airport charges which may exist between daa and carriers at Dublin Airport.

d) That any changes must be gradual (see International Civil Aviation Organization (ICAO) principles on airport charges[8]) and not within any current booking or financial planning cycle. For example, assuming carriers plan on a minimum of a calendar year basis, then any changes should only apply in the next subsequent year. At an absolute minimum change must not take effect before summer 2025 - airlines are already selling tickets based on the current structure of charges and would not be able to adjust their charges to reflect any changes in airport charges.

In summary, Aer Lingus firmly believe that there should be no immediate review of the structure of charges, and any residual issues can be dealt with on an ongoing basis through the annual charges consultation.

Aer Lingus is available to discuss any of the issues raised as required by the IAA.

Yours sincerely

[8] International Civil Aviation Organization, "ICAO's Policies on Charges for Airports and Air Navigation Services," Section II-1, ICAO Doc 9082, 9th ed., 2012, https://www.icao.int/publications/Documents/9082_9ed_en.pdf.

Appendix 5

Intervistas Consulting Group. (n.d.). Economic Impact Study of Dublin Airport (Draft 3). Retrieved from https://www.dublinairport.com/docs/default-source/corporate/economic-impact-study-draft-3.pdf?Status=Temp&sfvrsn=cb3175b6_8, page 45.

4.2

Catalytic Impacts

The catalytic impacts capture the way in which Dublin Airport facilitates the business of other sectors of the economy. This includes facilitating tourism, trade, investment and productivity growth which ultimately leads to employment growth and economic development. **Appendix B** summarises general research demonstrating the linkage between aviation connectivity and trade, investment, productivity and economic growth.

To illustrate Dublin Airport's contribution to the national economy, analysis was conducted of the relationship between connectivity at the airport and tourism, trade and economic output. Due to the impact of COVID-19 on both air traffic and economic activity, the analysis uses data from prior to the pandemic.

Tourism

Out of the 28.1 million passengers to/from Dublin Airport in 2022, it is estimated that 12.3 million were overseas visitors to Ireland (the remaining 15.8 million were residents of Northern Ireland and the Republic of Ireland and transfer passengers).27 This means that Dublin Airport facilitated approximately 6.1 million overseas visits to Ireland in 2022.[28]

The wide range of visitors through Dublin Airport is shown in Figure 4-3. Visitors from the British mainland accounted for 34.4% of international visitors through Dublin Airport, while U.S. residents accounted for 20.7%. Visitors for mainland Europe accounted for approximately 39%. Other prominent countries include Canada and Australia.

Each visitor through Dublin Airport spends money in the Irish economy on hotels, retail, restaurants, transportation, entertainment, etc. Tourism Ireland figures indicate that each visitor from the UK spends an average of € 293 per person, while visitors from mainland Europe spend € 514 and from the United States spend € 897 per person.[29] This injection of spending generates jobs and GVA for the Irish economy.