



Emirates Airline response to the 2019 Draft Determination CP3/2019

8 July 2019

RE: Emirates Airline response to the 2019 Draft Determination CP3/2019

Sent by email to info@aviationreg.ie

Dear Sir/Madam,

Emirates Airline ('Emirates') welcomes the opportunity to respond to the 2019 Draft Determination CP3/2019. Please find our response below.

Introduction – Emirates' operations in Ireland

In 2012, Emirates began operating non-stop daily flights between Dubai and Dublin. Due to significant demand outstripping supply, a second daily flight was introduced in September 2014. Currently Dublin is served twice daily with a Boeing 777-300ER. With this long-standing presence, Emirates has a significant impact on the Irish economy. A 2015 study by Frontier Economics found that Emirates' flights to and from Ireland had an annual GDP impact of €57 million. As Emirates is the only carrier offering non-stop flights between Dublin and Dubai, it is also an important contributor to Ireland's global air connectivity. Emirates not only connects passengers and cargo between Dublin and Dubai, but also provides efficient connections via Dubai to 80 destinations in the Middle East, Africa, Asia and Australasia that are not directly served from Ireland by any carrier. In 2018, Emirates carried 429,000 passengers to and from Dublin and currently we see there is potential for growth of our operations in Ireland.

The Draft Determination

Generally, Emirates believes that airport charges should be set at a level which enable airlines to satisfy demand for connectivity, while allowing for sufficient investment in current and future infrastructure development and service quality. In this case, we welcome the proposals in the 2019 Draft Determination to reduce charges in the 2020-2024 period, but we would also stress that a potential reduction should not be at the cost of infrastructure development and reduction of service quality.

Service levels

We believe the proposed reduction in airport charges is a bold step which could contribute to an increase in passenger traffic through attracting more airlines, but we would be particularly concerned if the impact would be a further deterioration of service levels.



Emirates has been a Dublin Airport Terminal 2 (T2) carrier since we began operations in 2012. It is our experience that the exponential growth of all traffic from Dublin - and especially Trans-Atlantic traffic - has had a steady negative impact on our ability to deliver a quality service to our customers travelling to and from Dublin. The impact of this month-on-month growth is now evident on a daily basis and in particular for our daytime service when the terminal is at its peak. During the summer peak period, it is particularly prevalent.

All customer touch points are under severe strain due to the lack of available check-in desks; boarding gates which are unsuitable for our aircraft type, passenger profile and volumes (up to 428 passengers per flight). Additionally, when US CBP is in operation, there is only one suitable Boeing 777-300ER stand at T2 and this is frequently occupied by other aircraft when we land in Dublin. This ultimately delays our actual arrival despite our consistently good on-time landing statistics.

All of the above circumstances consistently create negative experiences for our customers.

Growth opportunities at risk

When it comes to projected infrastructure development, Emirates strongly believes there is a clear business case for investment and expansion of the airport facilities. We have in the past supported DAA's capital plan to finance this expansion and will continue to do so. This support is rooted in a firm belief that without expansion, Emirates' own growth at Dublin Airport may be compromised.

For example, Emirates strongly supports the development of the new Pier 5 and the South Apron projects and we believe it is imperative to take into account any potential negative consequences a reduction in airport charge levels may have on the ability to finance those projects.

The fact that the Pier 5 project is connected to T2, is warmly welcomed by Emirates given it will provide an additional four stands capable of B777 aircraft or equivalent. Unlike Pier 4, this new development has a smart approach to CBP and non CBP / non- EU operations, as it is without the "swing-gate" element. This is a major development for Emirates and we would sincerely encourage that the project retains this important positive feature.



The Pier 5 gates also present a holding lounge opportunity which would be the first of its kind in Dublin and this would greatly enhance our service delivery.

In conjunction with the Pier 5 project is the overall redesign of the South Apron and this will permit bi-directional movements of Code E aircraft. This will enhance departure times as the current design is highly restrictive and creates a cul-de-sac which in turn prevents ATC from permitting aircraft to pushback despite being fully ready to depart.

Emirates sincerely wishes to remain a T2 carrier as has been our mantra for over seven years. We believe the T2 facility and Emirates are well matched and both complement one another, however, as outlined above, there are many current constraints. We had a temporary move of the Emirates daytime flight to Pier 3 from 25 January 2019 to 23 March 2019 and this proved very problematic on almost every level. Pier 3 is not compatible with B777-300ER operations and especially not for a 3 class service carrier such as Emirates. Every aspect of our operation at Pier 3 was impeded by the age, design, appearance and functionality of the facility, both internal and external.

Fundamentally, Emirates believes it would be regrettable if the future investment programme – especially with regards to Pier 5 – would have to be discontinued at the expense of passengers mainly.

Conclusion

The future plans for T2 as outlined in CIP 2020-2024 present the only realistic opportunity for Emirates to deliver its comprehensive service levels that our passengers expect and also offer us the opportunity to grow our business in Dublin.

Therefore, Emirates would have significant concerns if our ability to grow at Dublin Airport would be at risk due to CAR's judgment that lower airport charges in the next five years are more important than long term investments and improving service levels.

We thank you for the opportunity to respond to this consultation and are at your disposal should more information be required.

Kind regards,

A handwritten signature in black ink, appearing to be "Enda Corneille".

Enda Corneille
Country Manager