

Cathy Mannion
Commission for Aviation Regulation
3rd Floor, Alexandra House
Earlsfort Terrace
Dublin 2

By email info@aviationreg.ie

4 July 2019

Ibec response to Commission Paper 3/2019

Dear Cathy,

Ibec is grateful for the opportunity to comment on the recent draft determination by CAR on the maximum level of airport charges at Dublin Airport over the period 2020-24. As you are aware, we are Ireland's largest business representation organisation, with corporate members spanning every sector of the economy. Ibec's Transport & Infrastructure Council has previously made submissions to Government on a range of policy consultations that relate to aviation. These include the National Aviation Policy (NAP), the National Planning Framework (NPF) and the recent independent review of capacity needs at Ireland's State airports.

As outlined in our previous submissions, Ireland is heavily reliant on international connectivity provided by aviation infrastructure for both passengers and cargo. In order to ensure that Ireland's globalised economy is as resilient as possible against external threats, airport infrastructure needs to be future-proofed.

Ibec views Dublin Airport as a strategic asset whose continued development will be vital to the country's prosperity. The NPF itself highlights high quality connectivity as a national strategic outcome entailing the continued development of runway and terminal facilities at Dublin Airport. Ensuring that there is adequate pier and stand capacity at Terminals 1 and 2 to accommodate the growing number of air transport movements must be a priority if it is to serve as a secondary international hub as stated in the NAP. The business community therefore wishes to see the approved capital programme proceed in full, and on a timely basis.

We appreciate that the draft determination is based, inter alia, on a detailed economic appraisal of operating costs and the cost of capital. However, we would encourage the CAR to consider procuring further independent analysis on the specific issue of financeability, particularly as it relates to the projected debt levels in the closing years of the 2020-24 regulatory period.

Yours sincerely,

Neil Walker

Dr Neil Walker
Head of Infrastructure