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of commerce

Mr. Cathal Guiomard,
Commissioner,
Commission for Aviation Regulation,
3rd Floor,
Alexandra House,
Earlsfort Terrace,
Dublin 2.

29th July 2009

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RE: Submission on Draft Determination - Maximum Levels of Airport Charges at Dublin Airport 2010 - 2014

Dear Commissioner Guiomard,

The Dublin Chamber of Commerce welcomes this opportunity to make a submission on the setting of maximum levels of airport charges at Dublin Airport for 2010-2014. Dublin Chamber is the largest and most representative business body in the region, with 1,400 companies in membership of all sizes and sectors. We fulfil a central role in the City Region's life as the voice of business in Dublin. At the Chamber, we seek to promote Dublin as a great European multicultural city at the cutting edge of technological development, a city that is well governed and tops the international competitiveness league.

Dublin Airport is central to the continued development of the economic, business and tourism life of the Dublin City Region and the wider economy as a whole. Competition for international investment and employment occurs mainly between city regions. Dublin is the only city region of sufficient size and scale in Ireland to be able to successfully compete internationally. It is therefore important that Dublin is supported in its role as the engine of national growth and has airport infrastructure available that supports the long run requirements of businesses, tourists and international knowledge workers.

Dublin Chamber supports the complete investment programme outlined by the Dublin Airport Authority (DAA) to improve the passenger experience and service level at Dublin Airport, including a second runway capable of serving long distance markets such as Asia and the Far East and additional car parking facilities for passengers. In the immediate term, this capital investment programme is positively impacting on employment and helping to restore confidence – international, business and consumer. In the longer term, it will help to underpin the Dublin City Region's competitive position.

Dublin Chamber believes that all businesses, tourists and domestic users stand to gain from the capital programme that has been outlined and that the funding of the programme should reflect this. Charges for the entire programme should be shared equally between the stakeholders at DAA and not be segmented. In considering the airport charges for the next five years, a balance must be struck between the impact on demand of higher charges and the need to redress the region's aviation infrastructural deficit. Dublin Chamber was extremely disappointed at the introduction of an airport tax in 2008 and believes it should be removed. At the very least, we believe that the airport tax should be brought in line with airport charges in competitor airports of similar capacity in Europe and that the revenue from the tax should be ring fenced for infrastructural development in the areas surrounding the airport. We urgently request that CAR undertake a review of the impact of the airport tax on passenger travel and publish the findings.

Improving the operational efficiency and terminal capacity at Dublin Airport is an important step in reclaiming Ireland's competitive position internationally. We support the links being made by the regulator between the price and quality of the services at Dublin Airport.



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On balance, Dublin Chamber takes the view that the Dublin Airport Authority's investment programme is critical to the future development of the region and requires the funding to deliver it. At all times the level of airport charges should seek to be competitive (below) when compared with those of airports of similar capacity in Europe.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Gina Quin', written over a horizontal line.

Gina Quin
Chief Executive
Dublin Chamber of Commerce