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SUBMISSION TO COMMISSION FOR CIVIL AVIATION DRAFT DETERMINATION AND EXPLANATORY MEMORANDUM

I welcome the statement from Mr. William Prasifka, Commissioner, “The Commission has made no final conclusions, and none will be made until the Commission has considered any and all representations, which it receives, and has decided to either accept or reject them.”

Shannon Airport has played a vital role in the economic development of County Clare, the Mid-West Region and the West of Ireland over the past 50 years.

It is an essential part of the infrastructure of these regions.

It has been the single most important factor in the promotion and development of the Industrial Life of the Western Seaboard.

It has enabled the development of the Tourism Industry in Clare, the Mid-West Region, and the South and West of Ireland.

Without taking into account the location and historical context of Shannon, its strategic location and designation as an emergency and 24 hour airport this draft determination can only be considered a mathematical exercise.

To arrive at comparisons one must compare like with like and it does appear that in this case this has not happened. It would help my understanding of the determination if he would provide the basis for comparing such diverse airports and how precisely he arrived at his conclusions.

The Commission Draft Determination and Explanatory Memorandum on page 6 refers to the “Statutory Objective” and proceeds to outline the reasoning behind the resulting decisions and the factors considered. The development of such a vital infrastructure component must include the broader context of Statutory Objective to include Government policy such as Regional growth, balance and development and not be confined to the narrow interpretation that appears to have been applied.

It does appear that he is allowing charges to be applied at Dublin, which are lower than those to be applied to Shannon are. Landing charges should be set to encourage use and development of the facility.

Dividing the % cost among passenger numbers will automatically benefit the Airport with the highest throughput of passengers.

This to me does not appear to make sense at a time when Dublin is operating at near capacity. It is more logical surely that you would be encouraging greater utilisation of the other main airports such as Shannon as the Gateway into Ireland, thus maximising on investment.

The State should ensure that balanced development takes place and promote and encourage Regional Development. This can only be done if proper support structures are in place.

In page 13 it is clearly stated that “Aer Rianta is free to price below the maxima, or to use allowable funds”.

You have however included the cost of infrastructure development as a factor to be taken into account in arriving at the charges. Is infrastructure not a vital component of access particularly for an Island Nation? Our only means of access is through our air and seaports. Is it then logical that persons wishing to access/ depart this island should have to pay for the infrastructure that would allow access/ exit.

You are allowing Aer Rianta the freedom to determine, and to introduce below the maximum charges should they so decide, but putting in constraints that will militate against Shannon and have not considered nor allowed for consideration of the role of Shannon both for the travelling public and the greater good.

Thank you for your consideration,

Patricia McCarthy,M.C.C.