

Ryanair's Comments regarding the full co-ordination of Dublin Airport

5 June 2001

1. Introduction

Ryanair submits the following comments in response to the Commission for Aviation Regulation's consultation paper regarding the full co-ordination of Dublin Airport ¹. As a preliminary comment, Ryanair notes that Aer Rianta requested the Department of Public Enterprise to fully co-ordinate the airport as a quick fix solution to the extreme congestion that occurred in the terminal last summer. The airline users of Dublin Airport unanimously objected to co-ordination of the airport. The airlines noted that the congestion in the terminal was not the result of any capacity constraints at the airport and that forcing full co-ordination unnecessarily on the airport would not solve the congestion problems and would in fact inhibit growth.

However, despite this unanimous opposition, the Department of Public Enterprise decided, unilaterally, to appoint Airport Coordination Limited ("ACL") as the schedules co-ordinator for Dublin Airport. ACL replaced Aer Lingus in this capacity, despite the fact that no problems were identified with respect to Aer Lingus' handling of this function. In addition, the airlines were not consulted on the appointment of ACL, which was presented as a *fait accompli*. In any event, ACL's Interim Seasonal Report for the Summer of 2001 indicates that, although there is some minor peaking on the runway (based on Aer Rianta's low declared capacity), it certainly does not justify full co-ordination.

The Department also appointed the consulting firm, SH&E, to perform a capacity analysis as required under Article 3(3)(iii) of Regulation 95/93. The following are Ryanair's comments on the findings of the SH&E Report.

2. SH&E Report

The conclusion of the SH&E Report is that there is sufficient runway and terminal capacity at Dublin Airport for 3 to 4 years growth and there is therefore no need

for full co-ordination. This is so even despite the fact that SH&E did not properly assess the current and potential capacity of the runway infrastructure at the airport. The report also does not address Aer Rianta's chronic mismanagement of the terminal facilities, which is already leading to a replay of the situation that occurred last year but which Aer Rianta is now attempting to blame on Aer Lingus staffing, amongst other things. (See article from the Irish Independent, Thursday 24th May 2001, at page 36).

i) Capacity of the Runway Infrastructure

The SH&E Report accepts Aer Rianta's declared runway capacity of 40 movements per hour or 38 per hour in a two hour period. However, it notes that this is lower than some 'best practice' single-runway airports and suggests that with the adoption of best practice runway management, the limit might be raised to 44 movements per hour. In fact, the capacity of Dublin Airport's runway infrastructure could be increased to over 50 movements per hour in the short to medium term. Both Gatwick and Stansted are single runway airports and are developing their runways to accommodate 50 movements per hour. Indeed, Gatwick accounts for 30 million passengers on a single runway and Stansted plans to increase its capacity to over 25 million passengers per year, without building a second runway. Dublin Airport, on the other hand, already has the advantage of an existing parallel runway, runway 11/29, and a cross-wind runway, runway 16/34, both of which currently are vastly under utilised, despite repeated comments by Ryanair and others to Aer Rianta and the Department that these runways should be used more extensively.

Indeed, Ryanair submitted comments to SH&E on its draft report on this issue noting that runway 11/29 could accommodate traffic up to the size of a BAE 146 and that by taking this traffic off of the main runway it would increase the overall capacity and efficiency of the runway infrastructure. Ryanair estimates that approximately 40% of traffic currently using Dublin Airport consists of turbo-prop, light jets and 146 traffic that is capable of using 11/29. However, SH&E failed to take these comments into consideration in its final report and still classifies Dublin as a 'single runway airport'. The SH&E Report also does not mention runway 16/34, which could be used generally as a takeoff runway for all traffic up to heavies (i.e., A330's, 747's, etc.).

Moreover, even Aer Rianta recognised in its own Development Plan for Dublin Airport (dated 1997) that proper use of Runway 11/29 would increase overall runway capacity by 16%. Thus, taking 44 movements per hour as a base (i.e., once the shorter separation times are introduced by the IAA, which is currently underway), proper use of runway 11/29 would therefore increase runway capacity to 51 movements per hour. Greater use of runway 16/34 as a takeoff runway would increase this capacity even more. Infrastructural improvements to the existing runways, such as additional rapid exit taxiways, by-pass bays and an additional parallel taxiway for runway 10/28, would further enhance capacity in the

longer term.

It is Ryanair's contention that Aer Rianta is artificially limiting the runway capacity in an attempt to justify its plans to build another 'second parallel runway' or to justify 'peak pricing' on the runway. As discussed in our submission on the Commission's consultation paper on airport charges ², Aer Rianta is proceeding with plans to construct a full length parallel runway on the north side of the airport, despite the fact that the airlines have strongly objected to it because it is completely unnecessary given traffic forecasts and the fact that the existing infrastructure currently is substantially under utilised.

ii) Terminal Capacity

The SH&E Report provides Aer Rianta's current declared capacity for the terminal as 18.5 million passengers per annum whereas estimated throughput for 2001 is only 15.1 million. Therefore, capacity exceeds demand by approximately 20%. The Report notes that, to a large extent, the extreme congestion in the terminal last summer was due to a number of temporary infrastructural and organisational factors, primarily the construction of the 6 bay extension. However, the Report states that although some of the problems are now resolved, others, related to the poor design of the 6 bay extension (such as the fact that passengers arriving in the baggage reclaim area from Piers A and B must cross over those from Pier C to reclaim their bags), will persist. However, the Report does not suggest any solutions to these problems.

In addition, although the Report notes that groundhandlers reported a lack of effective organisation in the Summer of 2000 and that there was consistent anecdotal evidence of other serious mismanagement by Aer Rianta, the SH&E Report does not investigate these issues further nor does it suggest solutions to prevent re-occurrences of the congestion problems experienced last summer. Furthermore, the Report states that even if these reports are true, they do not lead directly to the conclusion that full co-ordination is necessary. However, this statement is only partially true. Instances of mismanagement should never lead to the conclusion that full co-ordination is necessary. Regulation 95/93 is concerned only with instances where demand exceeds available capacity and the capacity analysis should deal with how such capacity could be increased in the short term to avoid the need for co-ordination. ³

iii) Stands

The SH&E Report identifies the availability of stands as an area where there is a capacity constraint issue, although it admits that it cannot be stated categorically that there is a genuine shortage. The Report goes to great lengths to examine the availability of contact versus non-contact stands, even though it acknowledges that such a distinction is irrelevant to determining whether co-ordination is necessary or not.

The Report also notes that there is adequate land for the construction of more stands if Aer Rianta wishes to do so and mentions Pier D or a new terminal complex as possible options. However, although Aer Rianta received planning permission for Pier D - a low cost, efficient facility providing 12 additional contact stands - in 1998, it has consistently failed to build it. Aer Rianta is therefore responsible for the current lack of contact stands.

The Report also acknowledges that Ryanair is the most efficient user of contact stands, with average turnaround times of less than half that of Aer Lingus and other operators at the airport. Ryanair notes, however, that the turnaround times attributed to it in the Report are not reflective of actual turnaround performance. Ryanair consistently operates 25 minute turnarounds whereas Aer Lingus has an average of 45 minutes.

3. Conclusion

The SH&E Report confirms that there are no capacity constraints at Dublin Airport and that there are unlikely to be any for the next 3 to 4 years. There is therefore no need to fully co-ordinate Dublin Airport. Indeed, although the report fails to investigate the issue fully, it acknowledges the true cause of the congestion problems at Dublin Airport as Aer Rianta's mismanagement of facilities.

Ryanair submits that although the Report recognises that capacity on the runway is sufficient to meet short to medium term demands, this capacity could and should be increased through better management of the existing runway infrastructure and infrastructural improvements should be made in order to avoid the need for full co-ordination in the longer term and also to avoid the need to build a second major runway.

The extreme congestion that occurred in the terminal last summer is already repeating itself and is likely to escalate given that Aer Rianta has chosen not to address its own mismanagement and has instead opted to blame others for the problems that have arisen thus far this summer.

Finally, the issue of availability of contact stands, although not an issue with regard to co-ordination, should be addressed by building Pier D, which despite having received full planning permission, Aer Rianta still has not commenced building it, some 2 years later.

We are prepared to provide the Commission with any additional information it may require in making its determination on the full co-ordination of Dublin Airport.

¹ CP3/2001.

² CP2/2001.

³ See Article 3(3) (iii) of Regulation 95/93.