



Decision on the Full Coordination of Dublin Airport

Commission Paper 10/2001

Decision on the designation of Dublin Airport as “fully coordinated” under Council Regulation (EEC) No. 95/93 on Common Rules for Allocation of Slots at Community Airports.

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Commission for Aviation Regulation,
36 Upper Mount Street,
Dublin 2,
Ireland

Tel + 353 1 6611700

Fax + 353 1 6611269

E-mail info@aviationreg.ie

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1. EXECUTIVE SUMMARY

By virtue of section 8 (1) of the Aviation Regulation Act, 2001, the Commission for Aviation Regulation is the competent authority in Ireland for the purposes of the designation of Community airports located in Ireland as fully coordinated under Council Regulation (EEC) No. 95/93 ('the Regulation').

Prior to the establishment of the Commission, the Minister for Public Enterprise was the competent authority for the purposes of the Regulation. Having received representations from Aer Rianta that Dublin Airport should be designated as fully co-ordinated, the Minister, in November 2000, commissioned SH&E to carry out the capacity assessment required under the Regulation.

On 1 May 2001, the Commission initiated the process leading to a decision as to whether Dublin Airport should be designated as fully coordinated by publication of the SH&E Report and CP3/2001. CP3/2001 invited comments from interested parties on the capacity analysis performed by SH&E as well as on whether Dublin airport should be fully coordinated.

Comments were received and accepted from Aer Rianta, Aer Lingus, Ryanair, ACL and Servisair.

Following full consideration of the SH&E Report and the submissions received in response to CP3/2001, the Commission has decided that grounds do not exist to designate Dublin airport as fully coordinated under the Regulation.

2. SH&E REPORT

2.1. The Report and its Conclusions.

As was stated in CP3/2001, the Regulation provides that prior to an airport being designated as fully coordinated, the Member State must have carried out a thorough capacity analysis, having regard to commonly recognized methods. In November 2000, the Minister of Public Enterprise commissioned SH&E Limited to carry out a capacity analysis. The SH&E Report has been published on the Commission's website and therefore is not referred to in detail here.

The SH&E Report examined three broad areas of potential infrastructural constraints at Dublin airport: runways, stands and terminal capacity. The conclusions of the report, as to whether Dublin airport should be designated as fully coordinated, are set out below:

"However, it appears, at least on paper, that there should just be sufficient capacity available to delay a designation of full co-ordination for a small number of years. This view is based on our belief that improvements will be implemented in the following areas:

- *The improvement by Aer Rianta of its stand allocation and management processes.*
- *The co-operation of all users of Dublin Airport with Aer Rianta's management of the airport and its stand allocation decisions, particularly in relation to the use of contact and non-contact stands.*
- *Ground handling arrangements match growth in traffic*
- *The co-operation of airlines with requests from ACL for re-scheduling of flights to prevent periods when demands would exceed capacity; and*

- *The co-operation of new airlines to communicate with ACL before operating.”*

SH&E noted *“the most critical element in the airport system currently appears to be availability of stands, especially contact stands.”*

2.2. Submissions received in response to CP3/2001.

The Commission received five submissions in response to CP3/2001: Aer Rianta, Aer Lingus, Ryanair, ACL and Servisair. Those submissions were published by the Commission on its website. Aer Lingus and Ryanair agreed with the conclusions of SH&E that Dublin airport should not be designated as fully coordinated, however, each argued that a stronger case could be made for not designating Dublin airport as fully coordinated than was made in the SH&E report. Aer Rianta and Servisair disagreed with the conclusions of SH&E and argued for the immediate designation of Dublin airport as fully coordinated. ACL did not take a position on the change in the status of Dublin airport under the Regulation but did offer an analysis of the SH&E report.

While Servisair disagreed with the conclusions reached by the SH&E Report, it did not challenge the assumptions, analysis or factual basis contained in the report, nor did Servisair offer any evidence to support alternative conclusions. Aer Rianta, however, did challenge several elements of the SH&E Report. These challenges related to the availability of contact stands and are analysed below.

2.3. Aer Rianta submission on SH&E Report.

The SH&E Report (p. 18) found that *“In an emergency, taxiways P1 and P2 could also be used for parking aircraft.”* Aer Rianta submitted (Section 3.1) that *“What is left of Taxiway P1 (following development of the area for aircraft parking stands) is regularly used as a taxiway and flexibility on the*

manoeuvring area to Air Traffic Control would be reduced if it is used as a parking area.” As to P2, “Taxiway P2 cannot be used for any aircraft parking as this area is used by medium sized aircraft for engine testing.”

The SH&E Report (p. 21) asserts that *“stands wholly used by cargo aircraft were excluded from the turn-round time analysis”*. Aer Rianta replied (Section 3.1) that *“It is misleading to suggest that Dublin Airport reduces its flexibility in stand allocation because of cargo operations”* and that *“there are no parking stands at Dublin Airport dedicated to one type of operation (i.e.) Cargo.”*

The SH&E Report (p.23) found that *“Wide-bodied stand demands peaks at a requirement for six stands simultaneously on the sample days.”* Aer Rianta responded (Section 3.1) that *“this is misleading ... on 25 May 2001 between 0910 and 1115 there was requirement for 11 wide-bodied stands”*.

The Commission does not consider the issues raised by Aer Rianta to be material in the context of the analysis of the conclusions of the SH&E Report. Taxiways have limited ability to relieve stand congestion and this is acknowledged by the SH&E Report. Aer Rianta’s position that there are no dedicated cargo stands at Dublin airport indicates that there is increased operational availability of stands and supports the conclusion of the SH&E Report. Finally, as to wide-bodied stands, the Commission does not consider the one in a year event cited by Aer Rianta to be relevant to determining capacity constraints.

The SH&E Report concluded (p. 32) that *“the improvement by Aer Rianta of its stand allocation and management process is an improvement which if implemented (along with other improvements) will result in sufficient capacity to delay a designation of full coordination for a small number of years”*. Aer Rianta believes (Section 3.2.1) *“there is no evidence that the new stand allocation system will produce far greater flexibility in the*

allocation of scarce aircraft parking stands." The Commission accepts that the degree of the additional capacity that can be delivered at Dublin airport by a new system is uncertain and will need to be reviewed at the time of any future capacity analysis. However, the Commission considers it reasonable to expect that an efficient management of stands can deliver some improvement in capacity and that it was reasonable for SH&E to take such a consideration into account in reaching its conclusion.

2.4. ACL submission on SH&E Report.

ACL did not offer a view on whether Dublin Airport should become fully coordinated. However, ACL indicated that it *"broadly supports the majority of its (SH&E Report) conclusions."* However, it noted that the conclusions of the SH&E Report were based on the assumption that traffic growth will slow markedly to an average annual growth of around 5% and that *"the CAR must determine the reliability of this assumption."* The Commission has formed the view that the traffic forecasts contained in the SH&E Report are reasonable and that significant growth in excess of the forecasts is unlikely in the short to medium term.

2.5. Commission conclusion on SH&E Report.

Having considered the SH&E Report and the submissions of interested parties regarding the conclusions of the report, the Commission is satisfied that the SH&E Report fulfils the condition set out in Article 3 (3) of the Regulation that *"a thorough capacity analysis is carried out having regard to commonly recognized methods . . . for the purpose of determining possibilities of increasing the capacity in the short term through infrastructure or operational changes and to determine the time frame envisaged to resolve the problems."* In this context, the Commission notes that SH&E examined infrastructural constraints in runways, stands and terminal capacity as well as operational changes which may increase capacity in the short term.

3. THE DECISION

In making its decision on the designation of the status of Dublin airport, the Commission must consider both the capacity analysis carried out and the standard specified in the Regulation. The standard, set out in Article 3(4) of the Regulation provides that if the capacity analysis *“does not indicate possibilities of resolving the serious problems in the short term, the Member State shall ensure that the airport shall be designated as fully coordinated for the periods during which capacity problems occur.”*

Therefore, in making its decision, the Commission must go through a two-step process. Firstly, identify what “serious problems”, if any, exist in the capacity of Dublin airport. Secondly, determine if “possibilities” exist of resolving such problems in the “short term.”

The SH&E Report does not identify any serious problems that exist in the capacity of Dublin airport. The Report does state that *“the most critical element in the airport system currently appears to be availability of stands, especially contact stands. There are likely to be adequate stands available in total (contact and non-contact) to accommodate demand in the short term.”*

Accordingly, since the Commission accepts the SH&E Report as the capacity analysis required under the Regulation and since the SH&E Report does not identify any serious problems in capacity in Dublin airport which cannot be resolved in the short term, the Commission finds that there is no basis at present to designate Dublin airport as fully coordinated under the Regulation.

In addition, the Commission notes that SH&E has identified operational changes, in the form of a new stand management system that can increase stand capacity in the short term. Furthermore, Aer Rianta is in the process of adding 5 new wide body (10 narrow body) stands.

In accordance with the provisions of Article 3 of Council Regulation (EEC) No. 95/93 the Commission will update the SH&E capacity analysis periodically. Any update will measure the constraints in infrastructural capacity at Dublin airport and will focus on delays experienced in each of the elements of the infrastructure.

William Prasifka
Commissioner

17th October 2001