Submission on A National Aviation Policy for Ireland (Draft)

July 2014

Introduction

In June of 2013 Chambers Ireland, along with the Air Transport Users Council, made a submission to the initial consultation on an Integrated Irish Aviation Policy.

In that submission we highlighted the importance of aviation to Ireland. More than any other country in Europe, Ireland depends on air connectivity for business and personal travel. As an organisation that represents the needs of businesses, our recommendations focus on how an integrated aviation policy can best serve their needs.

We propose that all policy and service offerings must support the country's efforts to:

- Sustain the strong record on Foreign Direct Investment;
- Strengthen the domestic economy; and
- Stimulate import and export activity levels.

Chambers Ireland broadly welcomes the draft National Aviation Policy. Many of the recommendations included in our submission have been adopted and we welcome the recognition that is given to the needs of business, both with regard to imports/exports and the specific needs of business travellers.

However, we believe the draft policy omits a number of key points which could leave Ireland, certain geographic regions or economic sectors exposed if not addressed in the final policy.

Connectivity to Heathrow

For many business customers, Ireland's connectivity to Heathrow is arguably one of its greatest assets. We believe that a commitment to protecting the take-off and landing slots at Heathrow should be explicitly mentioned in final National Aviation Policy.

The importance of Ireland's three State airports

We welcome the continued support of Ireland's three State airports. All are essential to regional economic development, including tourism, and facilitate inward investment through the access they provide for international business travellers.

We would recommend the designation of all three as 24 hour airports of national importance, with robust 24 hour air traffic control.

Furthermore, while the draft policy mentions rail and road connectivity in relation to the declining significance of regional airports, we believe the final policy should include a commitment to developing internal travel infrastructure to ensure all three State airports are accessible from and provide access to all areas of the country. In particular, following the decision not to proceed with Metro North in Dublin, there is a need for alternative rapid rail links to and from the city, along with other national transport infrastructure, to be examined.

Regional airports

Chambers Ireland also welcomes the recognition given regional airports, which contribute significant value to localities and regions throughout Ireland.

We accept that Exchequer supports ought to continue beyond 2014; however, we believe that these should be phased out over a ten year period to incentivise self-sufficiency. To this end, we support the proposal that, in line with the increasing role of local government in community development, Local Authorities should have increased authority in the administration of regional airports.

In our original submission we suggested this could mirror the 'tiering' framework set out in the 2013 National Ports Policy.[1] This document identifies 'Ports of Regional Significance' that, while not dealing with large scale throughputs, are "best placed within their regional and local communities to allow both develop in a manner that is mutually beneficial."[2]

Air freight

The draft policy recognises that while the amount in tonnage of freight moved by air is low, the value of it is significant. Furthermore, there is a recognition that the nature of Irish exports are changing towards more 'low volume, high value' products.

In response, increased consultation between stakeholders and the National Facilitation Committee is welcome. The inclusion of all three State airports in any initiative is also welcome, as is the commitment to pursue an "open-cargo" policy for dedicated freight services.

However, we believe that, as this is an issue of increasing importance for Irish business, a timeline should be established to ensure swift progress on these matters and to guarantee that all stakeholders are aware of their responsibilities.

Flight training and education

The focus on education to ensure there is no 'lag' between the needs of the airline industry and the supply of skilled workers is very welcome. We support the range of qualifications identified, including apprenticeships, further education, degrees and post-graduate study. We also welcome the commitment to develop these further through the National Aviation Forum.

In addition, we would support the introduction the Multi-Crew Pilot Licence (MPL)[3] syllabus as a cost-effective method of training pilots. This method of preparing safe, competent airline pilots for a career on a multi-crew flight deck makes much use of modern simulators rather than hours in light aircraft. Therefore, it is not weather dependent and could be introduced in Ireland.

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[1] http://www.transport.ie/uploads/documents/news/National%20Ports%20Policy%202013%20-%20Web.pdf
[2] Ibid. Pg 13
[3] http://www.iata.org/whatwedo/ops-infra/itqi/Pages/mpl.aspx

Conclusion

Ireland will always be heavily dependent on air travel. The rapid pace of change in this sector makes an integrated aviation policy increasingly vital.

The contribution of Ireland's State airports in terms of economic growth and job creation is significant and the potential to increase this contribution cannot be overstated. These airports play a key role in our connectivity to international markets; markets which can be nurtured and developed to achieve further economic progress.

This is a time of significant challenges and opportunities for the entire aviation sector in Ireland.

An integrated aviation policy, which tackles these challenges and exploits these opportunities, will result in considerable benefits for Ireland.

Policy makers and regulators must remain mindful of the risks associated with the changing global economy and the aviation sector worldwide.

Above all else, Irish businesses require:

- Competition between a range of airlines, offering services to a range of international destinations;
- Connectivity to locations worldwide including those through Heathrow; and
- A regulatory environment which encourages travel through Ireland and facilitates the growth of a cost competitive aviation sector.

This must result in an aviation sector which helps to:

- Sustain Ireland's strong record on Foreign Direct Investment via rich levels of connectivity to vital global markets;
- Strengthen the domestic economy by facilitating incoming tourism traffic; and
- Stimulate cost competitive and timely import and export activity levels.