



The Director of Services
ANCA
Fingal County Council, County Hall
Main St.
Swords, Co.
Dublin, K67X8V2

23 February 2022

Sent by email to Angela Flynn for onwards submission

Dear Sir/Madam

RE: Planning reference F20A/0668

We understand that ANCA is undertaking a public consultation regarding its draft Regulatory Decision issued on 11 November 2021. As an airline with a considerable presence at Dublin Airport, we are writing to set out the firm support of Emirates for the proposed draft Regulatory Decision. In Emirates' view, it represents a pragmatic and responsible approach to managing aviation activities at Dublin Airport in the longer term, while ensuring the ongoing benefits that aviation provides to the Irish economy.

While the proposals set out in the draft Regulatory Decision cover a range of business areas, we will opt to highlight and comment on the following aspects. From an operational perspective, we believe the NQS for the full 8-hour night period offers a workable balance and provides sufficient flexibility. At the same time, we would still highlight that with constraints come the increased risk of potentially very penalising compounding operational aspects.

In the short term, the proposed QC limits do not represent a concern for Emirates. Our incumbent fleet of 777s and A380s will be impacted by the QC limits proposed from 2030 onwards for night operations out of Dublin airport, therefore impacting capacity deployment decisions and reducing overall fleet operational flexibility. However, the reduction in flexibility in the future may be offset by the expected evolution of future aircraft and engine technologies in Emirates' current order book. Our fleet of aircraft is already one of the youngest of the global airlines, with an average age of 7.3 years. This long-standing commitment to operating new modern aircraft means not just quality and comfort for our passengers, but that our aircraft are fuel efficient and generate a smaller noise footprint, as well as lower emissions per passenger carried

Emirates, 1st Floor, Skybridge House, Dublin Airport, K67, P6K2
Tel: + 35318124100
Website: <http://www.emirates.com/ie>



Overall, it is also important to stress that at Emirates, we are fully committed to minimising the environmental impact of our operations across all businesses and activities. Our environmental efforts are focussed on three areas – reducing emissions, consuming responsibly, and preserving wildlife and habitats. Emirates also supports the International Air Transport Association’s industry commitment to reach net zero carbon emissions by 2050.

Finally, and in a COVID-19 recovery context, it is worth underlining that Emirates is the only carrier offering non-stop flights between Dublin and Dubai and therefore an important contributor to Ireland’s global air connectivity. Emirates not only connects passengers and cargo between Dublin and Dubai, but also provides efficient connections via Dubai to 74 destinations in the Middle East, Africa, Asia and Australasia that are not directly served from Ireland by any carrier. In conclusion, Dublin is an important market for Emirates and therefore we attach great importance to long term operational flexibility and to a pragmatic local regulatory framework which delivers that, while taking into account the interests of all stakeholders.

Yours faithfully

Enda Corneille
Country Manager – Ireland