**UPS Response to ANCA’s Draft Recommendations to Amend Aircraft Operating Restrictions at Dublin Airport**

*February 2022*

**Background**

UPS is one of the world’s largest logistics companies, playing a vital role in the collection, warehouse and delivery of goods as well as having the world’s largest in-house customs brokerage operations. Our current operations in Ireland includes over 1,200 employees across 20 facilities. In July 2017, UPS acquired Nightline Logistics, one of the leading express delivery and logistics companies in Ireland. UPS currently operates a daily (Mon-Fri) Boeing 767-300 flight at Dublin Airport which connects Dublin and Shannon to our main air gateway in Cologne, Germany:

* Arrives 04:50 from Cologne and Departs 05:35 to Shannon
* Arrives 20:35 from Shannon and Departs 21:20 to Cologne

**Night Flights**

UPS is committed to ensuring we minimise noise at the airport. We are focused on being a responsible operator and neighbour and believe our operational record reflects this. UPS Airlines, with one of the youngest fleets in the industry contributes to aviation sustainability efforts by operating a fuel-efficient fleet and effectively managing aircraft and air hub operations. As the operator of one of the world's largest cargo fleets, UPS also leads the industry in deploying noise and emission reduction technologies and by executing noise reducing flight procedures. UPS promotes the development, testing and use of noise mitigation procedures to reduce noise on arrival and departure. These can successfully contribute to actual noise reductions, still allowing the competitive and efficient fleet utilisation of global cargo carriers.

Most importantly, air cargo night flights via Dublin Airport will be key in supporting Ireland’s economic recovery from the coronavirus pandemic as well as providing international connectivity both across the Atlantic and into other EU Member States in a post-Brexit world. Having flexibility within its air operations and support for air freight will be critical for Ireland’s competitiveness and potential for growth. Recent research shows that night flights carry around

€19 billion worth of imports and exports every year and supports €1.1 billion in GDP and 15,000 jobs.[[1]](#footnote-1)

**Condition 1:**

We welcome the proposed replacement of Condition 5, which placed a cap of 65 movements on flights during the night period, with a Noise Quota System (NQS) for night-time operations at Dublin Airport between 11pm and 7am. We believe that a NQS is more in line with other airports across Europe and reflects the current environment for night flights at the airport. However, we do not agree with the full eight-hour restriction between 11pm and 7am. This is not in line with what we see at other European airports where similar quota count schemes are in place and should reflect the 6.5-hour period as proposed by daa. This will provide more flexibility within those key shoulder hours.

**Noise Quota System**

While we do support the move towards a NQS we do feel that the associated aircraft restrictions (Schedule A, Part 2.1) outlined will have a disproportionate impact on air express operators and we believe further engagement is required. Ultimately, the most effective thing that can be done to incentivise the use of quieter aircraft is to put in place the conditions to facilitate growth. Growth has enabled UPS to implement new, efficient technologies to the benefit of our customers, the public and the environment. However, it is also important to understand why express carriers have to use wide-bodied intercontinental freighters which are larger and have a higher QC rating than the aircraft operated by low-cost airlines. With one larger aircraft, we can carry more volume, more efficiently, than a smaller, poorly utilised aircraft. In addition, the economic model of the express sector necessitates the use of aircraft for around 25 years as we need to plan our fleet and network strategy for the long term to provide a quality and efficient service for our customers.

UPS’s patterns of fleet use is also relevant. UPS aircraft will usually operate up to two rotations a day, unlike some passenger aircraft, which will operate up to five rotations a day, accelerating the rate of decline of the aircraft.

**Dispensations**

In section 2.2 a list of dispensations are given where the restrictions on noise will not apply. While we do agree with the need for dispensations, we do feel that there are should be more flexibility and breadth in the application of these dispensations. Flights can get delayed for many reasons. The Airport operator should have the ability to offer dispensation for reasonable operation outside of the QC allocation system and consideration should be given regarding use of the shoulder hours and the consequences for freight flights within the QC system

**Summary**

UPS supports ANCA’s recommendations, specifically in condition 1 which replaces the straight cap on flights on the current runway with a NQS. We would however highlight that the full eight-hour restriction between 11pm and 7am is not in line with what we see at other European airports that have NQS and we would ask that a 6.5-hour restriction window is considered to allow more flexibility in the critical shoulder hours.

We understand the need to minimise noise impact on the local communities but we urge this to be weighed against the economic importance of growth at the airport and especially the critical nature of air freight in ensuring the competitiveness of Irish businesses. Aviation is key to the supply chain, enabling Irish businesses, especially in the hi-tech, retail, pharmaceutical and healthcare industries to send and receive just-in-time deliveries. Protecting air freight is critical to economic growth and keeping Irish businesses competitive in a 24-hour global economy. With customers requiring late afternoon collections and early morning deliveries, the only time we can move export and import shipments is by air and at night.

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1. “The Economic Impact of Cargo Night Flying at Dublin Airport” Freight Transport Association Ireland [↑](#footnote-ref-1)