

## **IEA Submission: Aircraft Noise Consultation**

*Irish Exporters Association submission to the Fingal County Council*

28 January 2022

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### **Overview: The Irish Exporters Association**

The Irish Exporters Association (IEA) is the leading independent representative body and voice for exporters based in Ireland. The IEA represents exporters and supply chain operators across the country and works at regional, national, and European level, representing its members in front of legislators to create a regulatory and legislative framework that supports, drives, and fosters Irish exports.

We assist our members to grow their exports to world markets and drive the growth and development of all exporting businesses based in Ireland. We provide a set of highly relevant business services and products to assist our members with international trade.

- We **represent** the needs of members in the development of policy, lobbying, intervention at Government and EU level and in the media. Brexit and the Diversification of Export Markets, Trade Compliance, Climate Change & Sustainability and their impact on Irish exporters are core to our work.
- We offer **trade services** in the form of practical training, support, and advice right across the supply chain including our Certificate in International Trade, customs awareness, GDP, export and import compliance, consular, business travel support (visa and export documentation), route to market and general assistance with trade related queries.
- We have created **knowledge networks** among our membership to support our members in exploring new markets, route to market scenario planning, understand customs and supply chain challenges and provide thought leadership through a series of events and webinars. Networking and connectivity remain an important part of membership benefits. Our Export Industry Awards programme is our flagship event that celebrates the achievements of exporting companies and highlights the importance of the export sector to Ireland.

The IEA represents the whole spectrum of companies within the export industry including SME's who are beginning to think about exporting for the first time right through to global multinational companies who are already extensively exporting from Ireland as well as the providers of key services to the sector. The IEA is the connecting force for Irish exporters, providing practical knowledge and support across the Island of Ireland and in foreign markets.

Dear Madam/Sir,

We understand that ANCA is undertaking a public consultation regarding its draft Regulatory Decision issued on 11 November 2021. As an organisation representing Irish exporters, we are writing to ensure that our views and our members' interests are considered when reviewing the proposed Draft Regulatory Decision.

Our members utilise Dublin Airport plays an increasingly critical role in supporting our members to achieve success in international markets. These companies use Dublin Airport, whether to travel in person and/or to export and import physical goods on and off Ireland, on a regular basis for their business. Dublin Airport and its routes remain an important conduit for inward investment, particularly from the USA. Irish Exporting firms and the FDI community in Ireland employ hundreds of thousands of people directly and even more indirectly, and make a considerable contribution to our economy and society. As such, we believe that it is critical to maintain the existing air passenger and airfreight routes and to ensure that none of them is disrupted by the proposed Regulatory Decision. As Irish exporters continue to expand their markets, particularly most recently as a result of Brexit, we feel this consultation must also keep an eye on the effects this increased diversity of routing will have on requirements of the future.

Our members have been experiencing difficult trading conditions for two full years, and these have severely impacted their inbound and outbound supply chains. With our geographically peripheral location within the EU, air freight is playing an increasingly important role to counterbalance the delays experienced in EU ports such as Rotterdam and Antwerp, US ports on the Eastern Seaboard and other ports around the world. The international airfreight sector is vitally important to the Irish economy and for Ireland to maintain its competitive advantage. Further restricting access to the country's biggest airport during night-time will certainly hinder economic growth.

In conclusion, we note the decision by ANCA with regard to the North Runway and support the removal of the 65/night flight cap stated in Condition 1 of the DRD noise mitigation measures.

Whilst we welcome the replacement of both conditions as now written in Conditions 1 and 2 of the DRD noise mitigation measures, and whilst we note that the Draft Decision goes a long way to balancing the requirement for operational flexibility at Dublin Airport, allowing it to recover essential connectivity in a post-Covid environment, whilst also taking into consideration community concerns around noise impact, we feel the need to raise some concerns, all pertinent to the comments we make in our opening paragraphs above.

We would like to call attention to the fact that restricting access to the North Runway between 00:00 and 05:59 could disproportionately impact some carriers including express freight operators who out of no choice of their own (more to do with our geographical position and access to central hubs) carry out operations at night. Many Irish companies trade time-sensitive goods internationally (namely in the pharmaceutical and agri-food sectors), which will require timely access into global air-freight hubs. This is aside from the considerable amount of smaller inbound items, including consumer items, but also critically required items that need to arrive early into Dublin airport in order to access on time, our internal (on-land) onward logistics.

We also note that the proposal for an 8-hour noise quota system is longer than what would be the norm in other European airports which operate a similar scheme and have questions about our overall competitiveness with regard to this decision.

We welcome the introduction of the Residential Sound Insulation Grant Scheme for the impacted local residents.