



Planning Reference: F20A / 0668

Date: 28th February 2022

Re: ANCA Draft Regulatory Decision in relation to North Runway planning conditions

FTA Ireland (FTAI) is a not-for-profit membership trade association for the Irish freight, passenger and logistics industries. Established in Ireland in 2010, we are wholly owned and governed by our members and act solely in advancing their best interests. FTAI represents some of the largest freight distribution logistics and passenger operators in Ireland, with more than 25,000 employees.

FTAI made a substantial submission to Fingal County Council in January 2021, expressing our support for the amendment of the two operating conditions attached to North Runway. Within this submission, we outlined the considerable contribution of air freight to the Irish economy – cargo night flying in particular supports €1.1 billion in GDP and 15,000 jobs.¹

Critical to a continued and efficient air freight service for Ireland, is night flying. Freight flown at night accounts for 38% of the total freight volumes at Dublin airport and around 63% of night air cargo is transported by express freight operators primarily shipping sensitive goods. Operating during the night hours is absolutely essential, as it enables deliveries to occur at the start of the working day, therefore maximising productivity for thousands of organisations across Ireland. However, the two planning conditions as they currently stand, are not conducive to this activity. In fact, if implemented, they will significantly and, to the detriment of the Irish supply chain and economy, impact on air freight services to Ireland.

FTAI has been closely monitoring the process with respect to amending these two planning conditions and welcome the opportunity to provide our view on the draft decision of the Aircraft Noise Competent Authority.

Having reviewed the draft decision, we would like to make the following points for consideration by the Aircraft Noise Competent Authority.

1. FTA Ireland welcome the proposal to remove the upper flight limits during the night.
2. Regarding the proposed Noise Quota System (noise budget), for night-time operations at Dublin Airport between 11pm and 7am, we seek more information on how this quota will be applied. Consideration must be given to dedicated freight integrator services who such a vital component to the Irish economy and to preserve future supply chain competitiveness, obstacles should not be erected to compromise this. Specific recognition of this essential service should be considered for reference in your final report.
3. It is unclear why ANCA has recommended the NQS applies to the full 8hr night period. It is the experience of FTA Ireland members that such controls at other airports apply to a subset of the night period rather than the full period. 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

¹ [Air-Cargo-Night-Flying-FINAL.pdf \(ftai.ie\)](#)

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.

4. FTA Ireland believes the associated aircraft restrictions (Schedule A, Part 2.1) will have a disproportionate impact on air express operators. Fleet replacement cycles for freight operators are different to passenger operators with aircraft used for longer. In addition, to meet the needs of customers express freight carriers require aircraft which meets a minimum payload. Express operators are limited by the market in this respect, as there is no aircraft projected to come to the freighter market which could meet a 40 tonne payload capacity. To manage such a restriction operators would have to fly multiple smaller aircraft to reach the same payload. This is inefficient for operators and bring cost implications (including additional airport fees) as well as environmental implications for the airport community. As set out in ANCA's report, including progressively restrictive aircraft restrictions would impact c.12% of aircraft forecast to operate in the 8-hour night period in 2030. It is our expectation that aircraft used by all-cargo operators would make the vast majority of this percentage.
 - a. The freight industry as a whole is committed to a sustainable approach. However, we have concerns regarding the proposal to limit aircraft noise by 30% by 2030, 40% by 2035 and 50% by 2040, compared to 2019 aircraft noise levels. This recommendation requires further development. As currently structured, it will very quickly disqualify from operation at night a significant number of aircraft types and configurations, that will negatively affect the ability of cargo operators to connect the Irish economy to the rest of the world. We recommend a more considered and comprehensive engagement with airlines, aircraft manufactures and industry, including the air cargo integrator express cargo providers, to develop a more robust and realistic plan (roadmap) to support the phased introduction of aircraft that reflect the realities of airline fleet planning and that can deliver for all stakeholders.
5. There must be greater breadth of authority for the airport operator built into the final recommendations that supports flexibility for freight flights. 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.

Air cargo and particularly night flying accommodates the following:

- Enables trading relationships
- Makes Ireland more attractive place to do business
- Supports advanced logistics and supply chain functions
- Means Irish based companies can provide the highest levels of customer care and after sales service
- Air cargo supports consumer choice.

Finally, it is vital to Irelands reputation and international supply chain links that everything is done to preserve our competitiveness. We have seen during the COVID pandemic the important of Air cargo integrator express cargo services in supplying PPE, ventilators and other essential pharmaceutical



goods and equipment around the world. Recent CSO figures² show that the largest category of exports was Medical and pharmaceutical products. Exports of these goods accounted for 38% of all exports, or €62,631 million in 2021. The main facilitator of this is the air cargo freight sector.

We appreciate your consideration of this submission.

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² <https://www.cso.ie/en/releasesandpublications/er/gei/goodsexportsandimportsdecember2021/>