SUBMISSION FROM THE CHARTERED INSTITUTE OF LOGISTICS AND TRANSPORT IN IRELAND TO THE PUBLIC CONSULTATION ON A NATIONAL AVIATION POLICY FOR IRELAND

Introduction

The Chartered Institute of Logistics and Transport in Ireland ("the Institute") is the independent professional body for people engaged in logistics and all modes of transport. The Institute is part of an international body with 30,000 members worldwide. As a professional body, the Institute does not lobby on behalf of any sectoral interest, but seeks to take an independent, objective and considered view on matters of public policy.

Our submission begins by making some general observations on the draft document and goes on to respond selectively to a number of topics discussed in the paper. It also raises a few issues which are not explicitly addressed in the document. Our submission broadly follows the same order as that in the consultation document and uses the same chapter and section headings.

General Observations

The Institute welcomes the publication of the draft document entitled A National Aviation Policy for Ireland ("Aviation Policy") and appreciates the opportunity to respond to the public consultation on it. The publication of the final version of this document will represent an important step in the development of public policy relating to transport. The Institute hopes that in due course the Government will publish a full suite of policies covering all aspects of transport and eventually a comprehensive Transport White Paper properly integrating all dimensions of transport policy into a coherent overarching policy. This would move away from the largely sectoral and incomplete approach which has been followed to date and help create a single integrated vision for transport in a renewed Irish society and economy.

The Institute supports the broad thrust of the draft Aviation Policy but wishes to make a number of general observations which it considers will strengthen the final document:

- The Executive Summary briefly identifies the principal goals of aviation policy but there is no attempt in the main body of the text to develop these themes. The draft document immediately goes into the nuts and bolts of aviation policy without asking what it is all about. While it is possible to establish some of the key objectives of the policy from reading the individual chapters, the final

document would benefit from an introductory chapter which addresses the fundamental objectives of a national aviation policy, in terms of its impact on the economy and society. The relevance of the individual policy proposals can then be judged in terms of their contribution to the achievement of these overarching objectives.

- An introductory chapter providing an overview of the aviation sector in Ireland, briefly outlining its development, the current position and likely future trends, would be helpful and provide context for the subsequent policy proposals.
- The document should be accessible to readers who do not have a detailed knowledge of the aviation sector. It would benefit from a fuller explanation of some of the issues arising and we draw attention to a number of specific examples in our comments on the individual sections of the draft document.
- There should be a detailed glossary explaining terms used in the text.
- A number of the policy proposals would benefit from being more specific and less passively expressed. Again we point to a number of examples in our specific comments.
- Some policy proposals do not appear to arise from the background analysis and it would therefore be important to ensure that the issues which give rise to the proposals are clearly explained.

The International Context

A more detailed explanation of the respective competences of the International Civil Aviation Organisation and the European Union is needed in final version of this Aviation Policy. The draft appears to somewhat underplay the importance of the EU in the international context. It is particularly important to give a clear exposition of the extent to which aviation is governed by EU and international law and of the consequent limitations on independent action by Ireland. The role of the EU should be given a fuller treatment and its competence to act at an international level explained more fully. It is also important that the commercial realities of international aviation are clearly elucidated.

The policy proposals in this Chapter are very broadly stated and expressed in a quite passive form. For example, there is scope to develop policy proposal 1.1 on participation in international fora by setting out what our objectives will be. Building on the text in the issues section, further consideration should be given as to how specifically Ireland might better engage with the international bodies. An example of one possible way of doing this might be the secondment of staff to ICAO and the European Union institutions and encouraging and supporting Irish people to apply for positions in these bodies. Other countries are very active in this area and, if Ireland is to continue to "box above its weight" in this sector, it needs to at least match them. We should also consider how we can more actively influence international policy and

legislation at the drafting stage rather than waiting for the negotiating stage where our formal influence will be small.

Aviation Safety

It would also be useful in this section to have a better understanding of how aviation safety policy is developed and implemented on the ground and a fuller explanation of the respective roles of international and national bodies. It would also be helpful to explain the risk-based approach to Safety Management Systems (SMS) and what is required to achieve full implementation by Ireland of a State Safety Plan and SMS. The policy proposals section could be strengthened by better aligning them with the topics discussed in the background and issues narrative. For example, policy proposal 2.1.3 might be more strongly worded to include a commitment to ensuring that the Air Accident Investigation Unit is appropriately resourced to enable it to continue to discharge its functions in an effective manner and that it "retains the capacity to fulfil its investigative oversight obligations on the Irish registered fleet both at home and abroad". There should also be a policy proposal containing a commitment "to achieve full implementation of the State Safety Plan and SMS across the civil aviation system".

Aviation Security

The Institute welcomes the commitment to an outcome-focussed risk-based approach to aviation security and to the greater use of technological solutions where possible. It is important that the security measures adopted are proportional to the threat assessed. Some specific reference to air freight security would be welcome as most public discourse tends to concentrate on passenger security issues.

The section would benefit from some elaboration on how aviation security is regulated internationally and at EU level. Policy proposal 2.2.1 should refer to the acceptability of security measures to freight users as well as passengers and air transport operators. It would also be helpful to elaborate on the security regimes applying to air freight. Policy proposals 2.2.4 and 2.2.5 would benefit from some further background commentary in the issues narrative, for example to comment further on new and emerging threats and explain the "Trusted Traveller" programme.

Sustainability

It would also be useful in this section to further explain the respective roles of ICAO, the EU and national authorities in regulating for increased sustainability. The section would also benefit from some analysis of the particular challenges and opportunities

for Ireland in implementing increased aviation sustainability, taking account of factors such as the following:

- Our critical dependence on aviation for access passenger transport compared with most of our EU partners and the lack of land-based alternatives;
- The substantial role played by an Irish airline (Ryanair) in short-haul passenger air transport in Europe;
- The important role played by Ireland in the wider aviation business.

Air Services and Connectivity

This section would benefit from some further background analysis. For example, it would be very helpful to tabulate and map our current levels of international connectivity. This would show the parts of the world with which we have direct connections and the density of those connections and help to identify gaps in that network. It would also be useful to try to provide some context for this – how does the extent and density of our connectivity compare with our competitors and particularly with other small comparator countries. Some commentary on the gaps in our connectivity – informed in particular by the views of the enterprise and tourism agencies – would be valuable.

The introductory background section would benefit from some elaboration. For example what third countries has the EU Commission a mandate to negotiate with and what are the current ownership and control limitations in the Chicago Convention?

Market Access Rights

The Institute supports the policy proposals in this section but would welcome some further elaboration. It would be helpful to set out in somewhat more detail the free competition criteria which would form the basis for bilateral negotiations. It may also be appropriate to include other criteria, particularly relating to safety and security, as factors to be taken into account. It is important that the criteria to be used are set in as specific a form as possible as this will provide a clear basis for negotiations with third countries and avoid the possibility, however remote, of more ambiguous language providing cover for measures to protect domestic airlines. The Institute concurs with the view expressed in the draft Aviation Policy that any impact on these airlines is likely to be outweighed by the wider benefits for Ireland. Policy proposal 3.1.2 could usefully give an indication of our priorities for the negotiation of bilateral agreements with third countries, based on the gap analysis recommended earlier.

Irish Airlines

The Institute supports the proposal that Ireland should continue to pursue a policy based on competition between at least two airlines with significant home bases in the Irish market. It also supports the continuing commitment to a fully liberalised domestic aviation market but considers that the wording of policy proposal 3.2.2 might be strengthened by using some of the more robust language in the earlier analysis narrative.

Policy proposal 3.2.3 relating to the State's shareholding in Aer Lingus is expressed in very passive terms and could, we assume wrongly, be read as indicating a reluctance to dispose of the shares. The Institute considers that it is in the interests of Aer Lingus and Irish aviation that the State dispose of its residual shareholding and recommends that the policy proposal be restated in more positive terms, including a specific commitment to dispose of the State's residual shareholding when the conditions are right and spelling out what those conditions are. We accept that disposal should take place when conditions are right, but this caveat should not be used as a basis for unduly delaying the disposal. Price should not be the primary driving factor in any decision to sell the shareholding.

The rules which restrict third countries from owning more that 50% of an EU airline are also a relevant factor when considering the disposal of the State's shareholding in Aer Lingus. It would be interesting to know the Government's position on changing these rules.

The Institute notes that there is no reference in the text to the continuing ownership by Ryanair of shares in Aer Lingus despite significant regulatory interventions by both the EU and the United Kingdom competition authorities. The Government should set out a clear policy position on this based on seeking the disposal by Ryanair of its shareholding in Aer Lingus. Ryanair is a major competitor of the airline and its continuing presence as a shareholder is not conducive to the future development of Aer Lingus and to the retention of effective competition in a significant segment of the Irish aviation market.

The combination of both the Ryanair and State shareholdings creates a very unsatisfactory, destabilising and costly situation for Aer Lingus which needs to be resolved without delay so that Board and management can focus on developing and implementing a longer term growth strategy for the airline.

Air Freight Services

Policy proposal 3.3.1 states that the Department will liaise with the US authorities in relation to improvements in the US preclearance. This is very weak and we would welcome a more active commitment by the Department to progress this issue.

Policy proposal 3.3.3 suggests that Shannon Airport will be asked to prepare a business case for designation as an aero-industry hub. It would be helpful to include some background explanatory text on this topic in the issues narrative. The word "designation" has a particular meaning in international aviation law which does not apply in this context and another word should be used.

The Institute strongly welcomes the commitment in policy proposal 3.3.6 to develop an overall freight policy, including an air freight component. There has been a dearth of public policy on freight for many decades and it is important that this deficiency is addressed without delay and in a comprehensive way. This opportunity should also be used to set out a clear policy in relation to rail freight which has been a matter of ambiguity and uncertainty for a long time.

Capacity constraints for air freight at London Heathrow present an opportunity for the selective expansion of air freight services at Dublin and Shannon. While Irish airports will never have the range of long-haul routes that exist at Heathrow, the increase in long-haul routes to the United States and the Middle East could be further exploited for air freight purposes.

The emergence of the "control tower" as a value added solution in the supply chain has great potential for Ireland. The control tower is a way of organising transport in the most cost efficient way while meeting time constraints and complying with customer requirements and can involve managing many service providers and a complex network across a wide geographical area. Control towers are already being developed in-house by large manufacturers such as Proctor and Gamble and a major multinational logistics company is already investing in such an operation in the Shannon region for its customers. Ireland should seek to exploit the control tower concept for international freight traffic. It is not dependent on the physical movement of freight through Irish ports or airspace and Ireland has a number of competitive advantages which it can exploit – its Atlantic location, time zone, membership of the Euro and a highly educated English speaking workforce.

US Preclearance Service

Policy proposal 3.4.2 contains a commitment to promote the development of Dublin and Shannon Airports as preclearance centres. It would be helpful if this represented a commitment by the airports and not just a Departmental aspiration. The background narrative should elaborate on precisely what is envisaged in a preclearance centre.

Ownership and Operation of State Airports

This section would benefit from some analysis of the commercial risks and opportunities faced by the State airports in the medium term. This is particularly relevant in the case of Shannon Airport which, despite welcome revised governance arrangements and recent strong growth in traffic, faces continuing commercial challenges. It would also be useful to consider whether there is any conflict between policy promoting the development of Dublin as a secondary hub and the development of direct services to other airports.

The section is largely silent on Cork Airport other than noting the legal mechanism in the State Airports Act 2004 allowing its separation from the rest of the Dublin Airport Authority. Does it remain the Government's long term objective to establish Cork as an independent airport? In principle the Institute favours the establishment of an independent Cork Airport but accepts that this is not feasible in the immediate future. A possible way of addressing this might be to amend policy proposal 4.1.2 to include a specific commitment to review this issue as part of the promised overall review of State airport mandates in 2019.

More generally, it would be useful to include a specific interval for all future reviews of mandates rather than the broad phrase "defined intervals". The Institute considers that a lengthy period of perhaps ten years should be left between such reviews. This would provide continuity and certainty for the airports themselves and encourage the Government to be as thorough and comprehensive as possible when conducting each review. Such a commitment would not rule out re-consideration of the mandates in exceptional circumstances in the event of serious unanticipated events arising.

It would be helpful if the policy proposals made an explicit commitment that the State airports will continue to operate at arms-length from Government, with incentives to make profits, a robust and certain regulatory framework and the freedom to make commercial decisions. This language is used in the issues analysis but it bears repetition as an explicit Government policy commitment.

The Future Capacity Needs of the State Airports

The only immediate medium term issue relating to airport capacity is the provision of a second runway at Dublin Airport and the Institute set out its views in some detail in its response to the 2013 consultation paper on national aviation policy.

We can support the policy proposal to carry out five yearly reviews of capacity constraints and infrastructure needs, commencing in 2015. In our view there is a case for advancing the review of Dublin Airport if for no other reason than that the current planning permission for a new runway will expire in August 2017. A question that arises is who should carry out the review. While it is appropriate that the airports should carry out the very detailed assessments of capacity needs and infrastructure

requirements, there may be value in the Department itself commissioning a review at a strategic level which would inform the more detailed work by the airports. Such an approach has been adopted by the Department in relation to port capacity and it is at least worth considering whether a similar approach has merit for airports.

Regional Airports

This is perhaps the most unsatisfactory section of the draft Aviation Policy. It provides little clarity on what precise role is envisaged for these airports in terms of national aviation policy, wider transportation policy or even regional development policy. Until there is much greater clarity it is impossible to judge what, if any, policy or financial supports should be put in place. In the light of this, the Institute can do little more than repeat in updated form what is said in its submission to the 2013 public consultation.

There are a number of important considerations which do not appear to have been adequately taken into account when considering policy on the future of regional airports:

- How many airports are required to serve a state with a population of 4.5 million and a land area of under 70,000 square kilometres or an island with a population of 6.4 million and a land area of over 80,000 square kilometres?
- What are the transport and regional policy implications of the changes that have taken place in the surface transport system in recent years, particularly the completion of an extensive motorway network, the improvement of rail services and the development of the bus network and more particularly direct airport bus services? Planned future developments, such as the construction of the Atlantic Road Corridor, which will extend the catchments of both Cork and Shannon Airports, also need to be considered. Consideration of these issues should also be informed by the work undertaken by the Department on a medium to long term investment framework for land transport.
- Would the regions be better served by using the available funds to improve surface transport links to the State airports, including road improvements and better public transport services?
- To what extent are the catchments of the various airports overlapping and what implications does this have for the viability of individual airports? For example, what is the impact on Shannon Airport traffic of Ireland West Airport Knock and Kerry Airport? Should the State continue to fund competing regional airports which might have a negative impact on the future viability of a State airport?

- To what extent does policy on regional airports conflict with policy on the development of Dublin Airport as a secondary hub and the future viability of Shannon Airport?
- What are the prospects of the regional airports "developing and implementing new business plans leading to self-sufficiency within a ten year period" and what are the consequences if they fail to do so?
- Do the regional airports have a particular role to play in relation to the provision of helicopter search and rescue services and other emergency services?

The interests of business and tourism, from both a national and regional perspective, will always be best served by ensuring that we have viable commercial airports at Dublin, Cork and Shannon which provide the optimum number of air connections to the rest of the world. Efforts should continue to improve access to, and widen the catchment populations of, those airports by further improvements to the road network, particularly the Atlantic Road Corridor and access roads to the northwest, and further development of the public transport system, especially direct bus services to the airports. A greater catchment population will help strengthen viability of these airports and enable them to retain existing air services and convince airlines of the commercial case for the development of new routes.

We can support the retention of Exchequer support for public service obligation services retained in the case of Donegal Airport in view of its remote location and the length of time it takes to reach one of the principal airports on the island of Ireland.

Policy proposal 4.4.3 states that Exchequer support for regional airports will be phased out "over an extended period". This is too imprecise and should be amended to state a specific end date for such assistance. The period should be as short as possible, ideally no longer than five years. This would give the regional airports certainty and incentivise them to phase out dependence on Exchequer support.

Policy proposal 4.4.6 says that the future role of local authorities in the oversight of supports for regional airports will be examined. At a minimum, the supporting narrative should explain what type of role might be envisaged for local authorities in this regard. It is unlikely that local authorities will have the financial capacity to provide any significant funding to meet the ongoing investment requirements of the regional airports.

Review of Economic Regulation

The Institute is disappointed that this section has little to say in relation to policy on economic regulation of the sector. However we welcome the commitment to undertake an independent review of economic regulation in the aviation sector and

there should also be a commitment to publish a statement of policy when the review is completed. A specific timeframe for this review and policy statement should be included in policy proposal 5.1.1.

Aviation Regulatory Bodies

Consideration should be given to a specific section on air traffic management rather than just briefly addressing it in a chapter dealing with regulatory bodies. Ireland's geographic location, the quality of the ATM services provided by the Irish Aviation Authority and the development of the Ireland-UK FAB block are all important factors which can help position Ireland to play an important role in the future development of the Single European Sky and other initiatives to improve global air traffic management.

The Institute considers that aviation safety regulation in Ireland is working effectively and to a high standard. The proposed restructuring of the Irish Aviation Authority and the Commission for Aviation Regulation is intended to separate regulatory and service provision functions. We can support the principle of separating oversight and delivery, but we repeat the concerns expressed in our 2013 submission that its implementation needs to be handled with care to ensure that there is no disruption to the safety regime or no diminution in the standards, particularly during the transition period. It is important that management and staff are not distracted or diverted from their core regulatory jobs during the transition period. The transfer of responsibility for aviation security from the Department to the IAA increases the complexity of the restructuring process.

The Institute understands that the restructuring will result in the aviation safety regulator becoming a non-commercial State body whereas the IAA is currently classified as a commercial State body. The practical effect of this is that the new regulatory body will be subject to detailed controls on staffing and remuneration and that it will be included in the overall employment control framework for the Department of Transport, Tourism and Sport and its agencies. We repeat the concern expressed in our 2013 submission that this could lead to restrictions on the new body recruiting and remunerating the necessary staff and that it could adversely impact on the ability of that body to discharge its functions in an effective way. We strongly urge the Government to ensure that the new regulatory body can continue to do its job effectively. Aviation is very important to Ireland. One of the largest airlines in Europe is Irish. We have a very successful aviation leasing business in this country. There is scope to build on our existing base to generate further value for the economy and create good jobs. Shannon aims to create an international aviation services centre around the airport. The future of all these is dependent to a significant extent on an effective regulatory environment.

Policy proposal 5.2.3 talks of Ireland encouraging investment in modern, technologically advanced and cost efficient aviation infrastructure. The supporting narrative should elaborate on this laudable, if some vague, objective and illustrate how in practical terms the State might encourage such investment. It should also be clarified that the reference is to private commercial investment.

Corporate Governance of State Aviation Bodies

Policy proposal 5.3.2 states that the State aviation bodies should follow best corporate governance practice. It is equally if not more important that the State itself pursue best practice in its corporate governance relationship with these bodies. That includes:

- Communicating a clear and unambiguous mandate to each body setting out the Government's requirements and expectations;
- Putting in place effective and transparent arrangements for the selection and assessment of board members and for succession planning;
- Maintaining effective oversight of performance and effectiveness;
- Respecting the commercial freedom of each body and refraining from interference in their operations and decision-making processes, except where provided for by law or the State Bodies Guidelines.

Policy proposal 5.3.1 sets objectives for these State bodies: maximising financial and other returns, improving services and supporting economic development. They are also expected to have a clear dividend policy – a guideline figure of 30% of after-tax profits is suggested. It is important that the mandates to individual bodies provide greater clarity and precision relating to these objectives and indicate their relative priority. This is important as there can be inherent conflicts between these objectives. For example, service improvements may be more difficult to achieve if maximising financial returns or dividends is the overarching priority. What is the balance to be struck between achieving financial and other returns? The mandate should also set out clear performance criteria against which the boards will be held to account.

Greater attention should be given to the selection of board members for these State bodies. Some of them are big companies in their own right and substantial players in the Irish economy and it is crucial that their board have the right mix of skills and competences. The performance of the board and its individual members should be subject to annual review as is expected of major private companies under Stock Exchange guidelines. Attention should be paid to succession planning, ensuring both continuity and change in board composition. The Minister should meet the full board, not just the chairperson and chief executive, at regular intervals and engage with them – setting out Governmental priorities as

shareholder and discussing performance against objectives and issues of concern to either party.

Should the final Aviation Policy document comment on the role of subsidiaries of State bodies in the aviation sector, particularly the future of Aer Rianta International? It might also be useful to set out some policy principles to guide the pursuit of external commercial opportunities by the State aviation bodies. This might include reference to the extent to which these bodies should get involved in business ventures which are at some remove from their core mandate and the level of financial exposure which it is prudent to assume.

Employment Rights

The Institute has reservations about policy proposal 5.4.1. There is already a wide range of Irish and EU law governing general employment rights. There are also extensive rules which specifically govern employment in the aviation industry. Both the State and the EU should be slow to further intervene in this area unless there are clear safety concerns about some of the current employment practices.

However the Institute supports policy proposal 5.4.2 to support EU work in examining the growth of more complex commercial arrangements for employment in the aviation sector and in particular the human factors implications of such arrangements. The traditional model of an airline buying or leasing an aircraft and operating all or nearly all the services itself is no longer the norm. We are now seeing increasingly complex commercial arrangements. Airlines hire crew from agencies and are no longer the direct employers themselves. Air services are delivered by contracted-in aircraft operators and not by the company that sells the tickets and that contractor could in turn be using agency pilots and a dry leased aircraft. When an airline operated a service itself with its own staff it was relatively easy to police safety. The increasingly complex arrangements make it more difficult. If an agency pilot has no consistent work pattern or operating base, how can the regulatory system ensure that he or she is not already fatigued when starting work? It is fairly straightforward to regulate hours worked for a single employer, but less easy to do so in other circumstances. Consideration should be given to the use of electronic means to regulate this aspect of safety; an interesting approach to look at is the use of the electronic tachograph in the road transport sector which records driving time and rest periods and provides a basis for effective enforcement.

The primary focus of the review should be safety rather than social protection and it should not concentrate solely on employment issues but also consider other potential safety regulatory issues. The excellent and far reaching AAIU report on the accident at Cork Airport provides a good starting point for the review because it illustrates the complexity of some of the existing commercial arrangements in the

sector and the potential for serious adverse consequences. The AAIU report and our significant role in aircraft leasing both provide a strong basis for Ireland pursuing a more active role in relation to the review rather than just reacting in response to a Commission initiative.

Aircraft Leasing, Financing and MRO

The issues analysis states that appropriate policies will be pursued to support continued growth and employment in aircraft licensing. It is not clear from the narrative what policies, other than taxation, are relevant. The final text might elaborate on this.

It would be helpful to provide some further detail on Ireland as an aviation transitioning centre and what precisely is proposed. Should it be included as one of the policy proposals?

The potential adverse implications of the Commission's review of Article 83bis arrangements might be explained and the wording of the relevant policy strengthened.

Pilot Licensing

The issues section on pilot licensing would benefit from some further elaboration.

Recreational and Sport Flying

Some explanation of the purpose of the proposed IAA guidance referred to in policy proposal 7.5.1 would be helpful.

Statistics

The Institute is supportive of policy proposal 8.1 to make key aviation statistics available in one location. However it should be extended, as referenced in the background narrative, to include a review of the adequacy of the data collected. There should also be an explicit commitment to public access, subject to appropriate safeguards for commercially sensitive information.

Consultation with Industry

The Institute has no objection to the proposal to establish a National Aviation Forum. While it welcomes the proposed inclusion of representation from the enterprise agencies and third level educational institutions, it is also important that there is an avenue for consultation with the users of aviation. Consultation should be driven by the needs of consumers as well as producers. The needs of the economy and society and the requirements of the users, potential users and other beneficiaries of air transport (passenger and cargo) should be considered. It is important to understand the needs of business, tourism, the regions and so on. The Institute would also welcome the opportunity to offer an input to any ongoing consultation framework, providing an independent and objective viewpoint from the perspective of logistics and transport professionals.

Other Issues

Economic, safety and security regulation is carried out by independent agencies at arm's length from the Department of Transport, Tourism and Sport. The Institute supports this approach but reiterates the concern outlined in its 2013 submission that the more regulatory and other functions, across all transport modes, are assigned to independent bodies, the greater the risk that the policy making capacity of the Department will be depleted and its expertise hollowed out.

Regulatory **policy** is the responsibility of the Minister and Department and **implementation** the domain of the regulator. The Department needs to have sufficient resources and appropriate expertise to determine regulatory policy, identify and prioritise regulatory objectives and put in place effective governance procedures to ensure delivery by regulators. If the Department does not have the sufficient resources and the necessary skills it will simply cede the policy ground to the regulators and it is simply not appropriate that regulators should be deciding policy by default. The Department should also have the necessary skills and expertise to represent Ireland in EU legislative negotiations and at global decision making fora such as ICAO. While the expertise of regulators can be availed of in such cases, it should be under the leadership of the Department. This need not involve any duplication of resources and it may be possible to ensure that the Department has the necessary policy expertise through appropriate training and/or lateral mobility of staff between the Department and its regulatory agencies.

The Aviation Policy document should include a section on spatial, regional and land use planning, addressing matters such as the following:

- When updating national spatial policy, consideration should be given to measures which maximise the catchment areas of our principal airports. This should include consideration of the location of future population growth, the designation of growth centres and the development of the surface transport network.

- Consideration should be given to the need for further guidance for regional and local authorities on national aviation policy as it affects regional spatial and economic strategies and local development plans, with a view to ensuring greater consistency in policy and practice by those authorities across the country.

Consideration might be given to the scope for Irish port and airports to jointly exploit the potential for growth in the cruise market, with Ireland acting as starting and terminal points for cruises. For example, the wide range of direct services available through Dublin Airport (particularly from North America and the Middle East) coupled with the benefits of US pre-clearance provide a strong basis for market development.

Chartered Institute of Logistics and Transport in Ireland
July 2014