



An Integrated Irish Aviation Policy

Submission by Limerick Chamber, the largest business member's network in the West of Ireland to the Department of Transport, Tourism and Sport Consultation

July 2013

Executive Summary

The wider economic benefits of air transport need to be included in all policy and investment appraisals. Access to a global air transport network *widens the available market* resulting in higher revenues and potential returns from investment; it *facilitates efficiency improvements* allowing access to a wider base of suppliers and production techniques; and it *fosters greater competitiveness* allowing increases in both inward and outward investments as well as empowering the ability to exploit economics of scale (IATA, July 2007). There is a clear and positive relationship between the World Economic Forum Global Competitiveness Index and a country's connectivity.

“Greater connections to the global air transport network can produce a virtuous cycle for a country's economy. Improved links can stimulate higher productivity and GDP, which in turn further helps to support a country's aviation industry” (IATA, July 2007)

Introduction

Limerick Chamber welcome this consultation and congratulate government on initiating an overdue debate on an Aviation Policy for Ireland. It is something which the Chamber has sought for many years. We also wish to acknowledge and thank government for the leadership they have shown and the decisions they recently made regarding the separation of Shannon Airport from the Dublin Airport Authority. This is something which Limerick Chamber had lobbied for since 1996.

Limerick Chamber has an inherent interest in the preparation of an Airports policy as the leading business group in the Mid-West region. Shannon Airport has been identified as a strategic infrastructural asset and economic driver for the Mid-West region, Atlantic Corridor and metropolitan Limerick city region as identified in strategic spatial and development strategies including the NSS, the Mid-West Regional Planning Guidelines, The (draft) Limerick City Economic Spatial master plan, the Clare County Development Plan and the Shannon Town Plan.

Contained in this submission are the views of Limerick Chamber, the largest business network in the West of Ireland, representing businesses of all sizes, across all sectors. The primary focus of this submission is on the national strategic and infrastructural importance Shannon Airport plays in supporting economic growth and employment.

The Chamber proposes to make comments for consideration by the government in drafting the aviation policy under the following headings:

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Airports

Ownership

Ireland has three national airports as set-out in the 2004 State Airports Act located at Dublin, Cork and Shannon. These are fixed assets and instruments of public policy and must therefore remain the primary focus of government policies as engines of connectivity, supports for business growth and drivers of tourism.

The three state airports must remain within state ownership but the operations of the entities must encourage competition. In this regard the separation of Shannon Airport from the Dublin Airport Authority (DAA) Group was greatly welcomed.

The Department plays a key role as owner of these key infrastructural assets and should continue to support investment into the development of the infrastructure. The department must also ensure that international best practice is observed in the adoption of policies nationally specifically in the context of a European Aviation framework. The Department must also oversee that corporate governance and due diligence are adhered to in the running of these assets.

Critical mass is a prerequisite for airport success. The frequency of direct access flights to the US from Shannon is a connectivity as unique as the history of the airport itself. There is little doubt that it has played a vital role not only in supporting the tourism and hospitality sectors throughout the country, but the routes have also acted as catalysts and facilitators of inward investment; there are 515 US companies based in Ireland and the US accounts for 25% of export market.

To ensure the commercial longevity and support growth at our three state airports, national road and rail infrastructures must continue to be upgraded to improve the connectivity of our citizens, tourists and exports with our air portals to the world. It is essential for example that the M20 motorway, as part of the Atlantic Corridor supporting balanced regional development, be fast-tracked.

As an island economy located on the periphery of Europe, our three state airports, which are fixed assets of public policy, must remain under government ownership.

Regional Airports

A serious inequality between state airports and regional airports was allowed to develop in the past decade. Government pursued a policy of capital (CapEx) and operational (OpEx) expenditure supports for Ireland's regional airports while pursuing a purely commercial mandate toward the

three state airports. Between 2000 and 2009, in addition to Public Service Obligations (PSO) expenditure totalling €159.3m to regional airports program subsidising 2.7 million passenger journeys, the exchequer spent €22.4m on OpEx and €30.6m on CapEx supports. Despite recent realignments and shifts in policy focus the government has committed to continuing CapEx and OpEx funding for certain regional airports going forward. This commitment does nothing to alleviate the disparity in the funding models being applied to State and regional airports. A thorough economic impact study needs to be conducted to assess the financial rationale for continued state funding to subsidise regional airports. It is not appropriate that regional airports receive exchequer funding where they directly compete with state-owned entities. Such a policy undermines and underwrites the commercial viability of both operations.

Regional airports play a key role in connecting regions and support social cohesion. Proximity to an airport remains a key consideration for international investment decisions. Internationally Ireland has a high airport density, ranking 22nd in a review of 140 countries (World Economic Forum), ahead of countries such as the United Kingdom (42) and Germany (86). While the dispersion of population densities is an important factor to consider when assessing this figure one must acknowledge that one-quarter of Ireland's population lives in the Greater Dublin region and recent improvements and upgrades to national road infrastructure and motorway network has improved access to the three State Airports.

Current disparities and inequalities of policies being pursued toward state and regional airports need to be addressed

Capacity

Forfás (May 2012) identified the need for increased terminal capacity at Dublin; the subsequent development of Terminal 2 more than adequately addresses this deficit. Any future increase in demand can be adequately met through existing runway infrastructures at the three state airports and such utilisation is more cost effective than the construction of new runways.

We therefore do not believe that the construction of any additional terminals or runways is required in the foreseeable future.

Shannon is a unique national asset as the only airport in Ireland with runway capacity to accommodate larger planes – as highlighted recently when the world's largest plan, the Antonov 225 Mriya landed. It is essential that as an island economy on the periphery of Europe the facility to allow access to such aircraft be maintained. The runway capacity and adjacent lands available at Shannon Airport make it an ideal location for a freight cargo hub in Ireland and Europe.

Existing terminal and runway facilities can adequately cater for growth in passenger numbers

Non-Aeronautical Developments

48% of Europe's airports revenues are from non-aeronautical sources¹. Non-aeronautical revenues are helping airports across the world fund their infrastructural expansion programmes – Dubai Duty Free is an example of this, raising the equivalent of \$1.7bn from a consortium of lenders to support the airports fourth phase expansion. This reflects the global airport sector transformation from aviation infrastructures to outward-facing, commercially focused business-orientated service providers.

In their report on the future ownership of Shannon Airport Booz & Co. consultants concluded that for Shannon to operate in a commercial viable and profitable manner 'new sources of revenue should be explored including exploitation of land banks, exploration of cargo business potential and improved leverage and expansion of the US pre-clearance facilities to include cargo'.

The Irish Government plays a key role in facilitating non-aeronautical growth by implementing and adopting the necessary legislative and financial framework which allows for and incentivises such investments. In this regard the policies introduced in Budget 2013 to introduce a range of measures to support aviation related business, the construction of aviation service facilities such as hangers, as well as exploring funding opportunities for financing and leasing companies are greatly welcomed and commended.

Non-aeronautical revenues play an ever-increasing role in supporting airports viability. Government policy must facilitate and encourage this expansion

Pricing

The separation of Shannon Airport from the Dublin Airport Authority (DAA) with effect from January 2013 has opened up competition in Irish airports. The previous structure was masking the ever-increasing dominant position that Dublin Airport has played in recent years, accounting for upward of 80% of all passenger traffic. To ensure no abuse of power and dominant position, pricing regulation is necessary at Dublin Airport.

¹ <https://www.aci-europe.org/policy/fast-facts.html>

The emergence of low cost airlines has forced highly competitive charging structures by airports to airlines. To facilitate this airports' must be competitive in terms of their cost base.

This low aeronautical revenue can only be justified if non-aeronautical revenues – such as parking, food & beverage and shopping –increase. The 'one bag rule' being pursued by low cost carriers is limiting passengers' ability to shop and is placing additional revenue pressures on airports. A review of this rule could allow our state airports to offer competitive aeronautical charges.

As a designated emergency stop for all transatlantic flights Shannon Airport has a unique role in Europe, but also plays an integral role in international air traffic control (which is envisaged to continue with the emergence of the Single European Sky agreement). As a 24/7, 365 day a year operation Shannon Airport is also important asset of national security. This status comes at an additional cost that is not off-set by government funding or by in-frequent use of its round-the-clock services.

As a business representative association Limerick Chamber supports competition however government policy must ensure no abuse of dominant position by Ireland's largest State airport at Dublin.

Services

Irish Airlines

"There is statistically significant and positive link between connectivity, productivity and long-term economic growth" (IATA, July 2007)

As highlighted in the consultation document international airlines are trending toward consolidation. As a small island economy on the periphery of Europe Ireland is in a unique position as home to the largest low cost European airline Ryanair, while the government retains a 25.1% stake in Aer Lingus, the historical national airline. Both airlines play a pivotal role, albeit serving different market demands, in supporting Ireland as a key destination for tourism and inward investment.

Ryanair's 29.8% shareholding in Aer Lingus is the focus of a current investigation by the British Competition Commission, the ruling on which is due next month. As stated from the onset Limerick Chamber supports competition, both in the private and public sectors. In February this year we made a submission to the European Commission DG Competition (Appendix one) outlining our observations on Irish business needs from the aviation sector as well as expressing concerns over a potential monopoly position that would be created if Ryanair were to successfully bid for and takeover Aer Lingus.

Competition in the Irish Aviation sector is best served by having at least two Irish airlines of scale

Connectivity

A cause of concern on the part of the business community is government's commitment to the sale of its share in Aer Lingus. Hub connectivity is a key pre-requisite for business locations. Businesses need reliable, timely and appropriately priced access to their existing and potential suppliers and customers, as well as linking into their intra-and external business networks. London Heathrow is Europe's best connected and busiest airport. Taxi slots at Heathrow are a sought after and valuable asset as reflected in the balance sheet of Aer Lingus. Ireland holds a unique position – our three state airports have unparalleled rights to slots at Heathrow. There is no doubt that this connectivity plays a pivotal role not only on the attractiveness of Ireland as a location for inward investment but also supports our growing export orientated economic recovery.

Where market failure exists state intervention is required. If the sale of Aer Lingus is pursued the Irish government are putting the connectivity of Ireland in jeopardy. We therefore call on government to conduct a vigorous and comprehensive analysis assessing the potential impact on the loss of this connectivity. If this evidence based research finds that market failure exists i.e. that this connectivity will be transferred to other routes were Aer Lingus taken over by any international carrier, then government intervention is not only justified but required, and the sale of Aer Lingus must be reviewed.

Finally, it is imperative that government policy supports and encourages 'alternative' European hub connectivity which is not limited to Dublin. Aer Lingus's Cork-Amsterdam route is the only European hub, other than Heathrow, that is serviced outside of Dublin. A policy which addresses this and complements European policies of balanced regional development must be adopted.

Limerick Chamber reiterates the Forfás (April 2013) recommendation that Ireland maintain competition in the airline market. We echo their call that "should the State share of Aer Lingus be sold, maintaining and developing competition, and expanding the network of routes should be a key criterion in the sale process". This stipulation needs to be in place over these valuable slots indefinitely, not merely for one or two IATA seasons.

Air Travel Tax

The current €3 travel tax is impacting negatively on Ireland's competitiveness. Ireland ranks 79th with a value of 76.3 in an index of ticket taxes and airport charges – an index of relative cost of access to international air transport services (World Economic Forum) lagging behind our European counterparts such as Germany, France and the UK as well as accession countries such as Croatia and Macedonia. A penalty placed on people entering our country for business or leisure is an unnecessary barrier, particularly in an era with the strong emergence of low-cost travel preferences, particularly in intra-European tourism.

Evidence based research by consultants PriceWaterHouseCoopers (PWC) (February 2013) into the economic impact of the UK equivalent travel tax 'Air Passenger Duty' (APD) concluded that its abolition would boost growth in the immediate term and contribute to longer-term growth in the economy. They estimate an additional 60,000 jobs would be created and a net positive gain of £0.25bn per annum for the exchequer. While acknowledging that the APD in the UK is higher than the Irish Travel Tax, critically the PWC report concludes that it would be the business community that would benefit most from the abolition of the tax; their model suggests abolition would lead to business expansion and an increase in productivity.

Transatlantic and European routes account for over 96 per cent of passengers through our three state airports in 2012. A 2007 report by Intervistas for IATA estimates an elastic demand for these routes (1.2 for Transatlantic and 1.4 for intra-European), confirming the sensitivity to price increases.

To support business expansion and growth, the Irish travel tax should be abolished

Future Traffic Negotiations

Fifth freedom rights are particularly important for Shannon. A report in the UK by the Civil Aviation Authority (2005) explicitly recommended the granting of fifth-freedom traffic to airports outside the overly congested 'city' airport. We recommend that this is a model government should examine.

Historically bilateral and fifth freedom rights have been more liberally accorded to Shannon than other airports in Ireland, allowing for example Aeroflot carry passengers between Shannon and Cuba in the 1970s and 1980s. As identified in the Shannon Aviation Business Development Task Force Report the Russian carrier Transaero has publically expressed interest in flying from Moscow via Shannon to the United States and in carrying Irish and American passengers between Ireland and the US. The Irish government must pursue policies which allow for the full realisation of these potential long-haul market opportunities which complement the US pre-clearance facilities already in existence at our national airports, particularly successfully at Shannon.

Fifth freedom rights should be actively pursued to complement the pre-clearance facilities available

Cargo Services

There are 509 airports in the US and 450 in Europe. Shannon, Ireland was the first airport outside the Americas to successfully achieve customs and border pre-clearance (CBP) for passengers. This is a hugely significant and differentiating factor for the Irish Aviation sector. It allows Ireland to become a European gateway to the US. However there is also huge untapped potential to exploit Ireland as a pan-European cargo pre-clearance destination. The Irish government should actively pursue the development of the necessary relationship and trust as well as legislation framework necessary, highlighting the success and track record of passenger CBP, to extend CBP to cargo. The approval of this facility by the US Food and Drug Administration (FDA) is particularly important given the importance the pharmaceutical industry plays in driving Ireland's export orientated sustainability and growth. The Irish pharmaceutical industry is one of the largest critical mass employment sectors nationally, supporting 60,000 Irish jobs and exports over €50 billion annually.

In particular, as identified in the Shannon Business Task Force Report, there is a lack of temperature controlled, or 'cold-chain' facilities to accommodate the demand for this high-value pharmaceutical air freight. There is also untapped potential in the export of Irish fresh foodstuffs and seafood, which acclaims international recognition as a quality product with associated international demands, particularly in East Asia.

Despite repeated shocks and recession, cargo volumes continue to grow internationally. Dublin Airport currently accounts for over 90 per cent of Ireland's air freight (approximately 120,000 tonnes in 2010). There is huge opportunity for Shannon Airport to develop its offering in this respect, capitalising on its long runway, freedom of congestion and curfews.

The World Bank rank Ireland 15th out of 185 countries for 'ease of doing business' (2013)². Ireland has the lowest cost of moving export goods internally in Europe – however this competitive advantage is eroded by our island location and when distance to customer is factored in Ireland ranks less impressively, with the cost of exporting in Ireland exceeding the OECD average³. Ireland's inadequate air cargo infrastructure is driving this lack of competitiveness; air cargo is being transported in truck across Europe unnecessarily forcing costs upward.

While the potential of air freight cold-chain facilities must be actively pursued the majority of cargo still travels in the holds of passenger aircraft, specifically on long-haul operations. It is therefore imperative that airports have the necessary airport cargo facilities to assist airports in attracting

² <http://www.doingbusiness.org/data/exploreeconomies/ireland#trading-across-borders>

³ World Bank Doing Business indicator 'Trading Across Borders' Cost to Export (US\$ per container) Ireland 1,135. OECD average 1,028. <http://www.doingbusiness.org/data/exploreeconomies/ireland#trading-across-borders>

long-haul carriers offering additional revenue streams. The provision of a dedicated cargo terminal at Shannon would provide a significant boost in assisting the Irish export sector.

It is vital that the Irish government obtain US cargo and FDA preclearance. It supports our role as an international hub location for the pharmaceutical industry. Shannon Airport has the capacity to develop the necessary cold-chain facilities necessary to exploit the cargo potential services from Ireland as a European gateway to the US.

Regulation and Governance

Aviation Security

With US Customs and Border Preclearance (CBP) already operational at Irish airports it would be highly advantageous and beneficial for the Irish government to pursue international agreements, particularly with the US, to develop global passenger alliances to link into initiatives such as the FLUX, Privium and Global Entry trusted traveller programmes. If Shannon was to have the ability to offer fast tracking of 'trusted travellers' in addition to CBP it would reaffirm its position as the European gateway to the US. The infrastructural requirements to allow for this fast-track facility would complement and utilise the facilities already in existence for CBP.

The introduction of 'trusted traveller' programmes would complement existing facilities and deepen Ireland's presence as a European gateway to the United States. We recommend that government seek to have the Global Entry programme opened to Irish citizens.

Aircraft Leasing and Governance

Ireland is one of the largest worldwide centres for aircraft leasing and registration; it is a vibrant sector with expansion opportunities. With more companies electing to lease than own, the commercial aircraft leasing market is a huge and growing part of the aviation industry. It has been estimated that in 2010, aircraft lessors had over 7,500 aircraft on lease, almost 36% of the world fleet. This share is projected to climb to 50% or more within ten years. But there is untapped potential to enhance Ireland's position as a leading global leader.

Ireland must pursue our global position as a leader in this sector by "preserving the competitiveness that attracted leasing companies to Ireland in the first place, and developing additional support capabilities, which will serve to anchor their activities more firmly in Ireland. The area of lease transition, has been identified as a key "anchor" service for lessors and one that Shannon is particularly well equipped to provide" (Shannon Aviation Business Development Task Force, November 2012, p. 18).

The government must encourage and adopt fair tax treatment to ensure we can continue to compete with emerging countries in this sector such as the Isle of Man and Malta. Ireland must also be watchful of international developments and trends in the market place, such as the growth in corporate aircraft leasing, which is almost entirely bypassing the country at present. With competitors aggressively pursuing potential expansion opportunities, Ireland must counteract to ensure our competitive advantage in the aviation leasing and finance sector is in the first place maintained but more importantly pursued vigorously.

To facilitate growth, specifically in the field of aviation financing, government must ensure the necessary legal provisions for insolvency are aligned with international best practice. The current system is an obstacle to developing the opportunities that exist in the capital markets.

With its new structure, Shannon Airport has both the necessary infrastructural capacity and workforce, for the development of an International Aviation industry cluster. An International Aviation Services Centre (IASC) at Shannon would build on Ireland's strengths and would serve to anchor the aviation and aircraft leasing and financing industries already present in Ireland supporting business and job growth.

Aerospace, maintenance, repair and overhaul

As highlighted in the Shannon Task Force final report the maintenance, repair and overhaul (MRO) market is forecast to grow and Europe is a key player in this market offering high levels of quality and consistency. A number of variables impact on a firm's location decision including reputation, downtime and flexibility. A 'one-stop-shop' facility, provided by one or several co-operating providers in the one location, is a particularly attractive option to a lessor. Shannon has the infrastructural capacity and runway capabilities to develop this type of cluster facility, building on existing strengths of Shannon-based companies.

The Shannon Task Force report also identifies potential business expansion opportunities in the Original Equipment Manufacturer (OEM) approved transition management facilities citing the example of Transaero Engineering – benefiting from the support of its parent airline, when there is spare capacity in the Shannon facility, Transaero aircraft are sent to Shannon for maintenance rather than to an alternative external facility. A one location, which can offer reliable service, is an attractive offer for lessors. Shannon has the potential to develop such a facility, given Ireland's existing international reputation, is one that cannot be replicated in many other locations.

As identified in the Shannon Aviation Business Development Task Force Final Report, Ireland – specifically at Shannon Airport, has the opportunity to maximise returns on investment in the aviation growth sectors of Maintenance, Repair and Overhaul and Original Equipment Manufacturing. This is a sector with job growth potential and government aviation policy must complement the work of the DJEI and Action Plan for Jobs.

Education, Training and Employment Rights

The Mid-West region has an established reputation in educational excellence both nationally and internationally. Associated with the predicted expansion in aircraft over the next 20 years comes the need to train and up-skill not only those who are directly employed by airlines, such as pilots and flight crew, but also those in the ancillary support services such as engineers.

Research conducted by the Shannon Task Force found that training providers identified Shannon as an attractive location both the airfield itself as well as the uncongested surrounding airspace. However an obstacle to securing such a training facility is the lack of suitable hanger facilities. In this regard, incentives included in Budget 2013 to promote their construction were very welcome.

With the national realignment of educational facilities in Ireland Limerick Chamber reiterates the recommendations by the Shannon Task Force in their final report that the Irish government should: actively pursue complementary opportunities for technical and ATC training as well as other aviation industry education provision; explore the possibility for College of Ireland or a successor body, to be based in Shannon, to provide co-ordination and marketing support for the activities of Irish aviation training SMEs; target additional industrial placements for local universities with key aerospace companies and OEMs worldwide; and develop specific academic and training courses focusing on composites at UL, LIT and other institutions.

There is an emerging trend for airlines to outsource the management of their technical documentation to third party providers with the appropriate regulatory approval to operate as a Continuing Airworthiness Management Operator – a heavy technical documentation burden placed on airlines, associated with the strong need for on-going operation of an aircraft and the high levels of safety and regulation within the sector.

As Shannon plays a pivotal role internationally as an air traffic control centre the IAA should maximise on Ireland's potential as a European centre of excellent in education and training centre for aviation staff.

General Aviation

Limerick Chamber believe there is an opportunity for growth in the corporate and business aircraft sector and recommend the government develop a complementary aircraft registry which could attract specialist companies not merely lessors and brokers, but also corporate-aircraft MRO providers and completion centres to Ireland. Such a registry would complement the existing strengths Ireland has an aviation leasing centre internationally. Competitors in this field, such as Malta and the Isle of Man have already sought to establish such a registry.

Conclusion

The wider economic benefits of air transport need to be included in all policy and investment appraisals. Air transport plays a key role in economic development and in supporting long-term economic growth. The IATA (July 2007) find a positive correlation between the level of connectivity and productivity; a 10% rise in connectivity, relative to GDP, will boost labour productivity by 0.07%. They conclude that investment in aviation can generate wider economic benefits, that these must be included in policy appraisals, that liberalisation can create increases in air transport connectivity and that the wider economic benefits from aviation help to boost competitiveness.

Limerick Chamber wishes to make the following observations and recommendations in regard to this policy issues paper on the development of an integrated aviation policy for Ireland:

- As an island economy located on the periphery of Europe, our three state airports, which are fixed assets of public policy, must remain under government ownership;
- Current disparities and inequalities of policies being pursued toward state and regional airports need to be addressed;
- Existing terminal and runway facilities can adequately cater for growth in passenger numbers;
- Non-aeronautical revenues play an ever-increasing role in supporting airports viability, Government policy must facilitate and encourage this expansion;
- As a business representative association Limerick Chamber supports price competition;
- Competition in the Irish Aviation sector is best served by having at least two Irish airlines with significant Irish bases;
- Ireland must maintain competition in the airline market; should the State share of Aer Lingus be sold, maintaining and developing competition, and expanding the network of routes should be a key criterion in the sale process;
- To support business expansion and growth, the Irish travel tax should be abolished;
- Fifth freedom rights should be actively pursued to complement existing pre-clearance facilities;
- It is vital that the Irish government obtain US cargo and FDA preclearance. It supports our role as an international hub location for the pharmaceutical industry. Shannon Airport has the capacity to develop the necessary cold-chain facilities necessary to exploit the cargo potential services from Ireland as a European gateway to the US;
- The introduction of 'trusted traveller' programmes would complement existing facilities and deepen Ireland's presence as a European gateway to the United States;
- With its new structure, Shannon Airport has both the necessary infrastructural capacity and workforce, for the development of an International Aviation industry cluster. Many existing aviation clusters worldwide lack at least some of the strengths Shannon already has. An International Aviation Services Centre (IASC) at Shannon, would build on Ireland's strengths and would serve to anchor the aviation and aircraft leasing and financing industries already present in Ireland;
- As identified in the Shannon Aviation Business Development Task Force Final Report, Ireland – specifically at Shannon Airport, has the opportunity to maximise returns on investment in the aviation growth sectors of Maintenance, Repair and Overhaul and Original Equipment Manufacturing;
- As Shannon plays a pivotal role internationally as an air traffic control centre the IAA should maximise on Ireland's potential as a European centre of excellence in education and training centre for aviation staff;
- Government should look to introduce an aircraft registry for business and corporate aircraft.

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