



Strictly Private & Confidential

9 November 2021

Commission for Aviation Regulation
Dublin
Ireland

By email: info@aviationreg.ie

Re: Response to supplementary consultation on RP3 Performance Plan

Dear Sir/Madam,

Ryanair welcomes this supplementary consultation following the publication of Eurocontrol's revised traffic forecast in October.

Ryanair supports CAR's proposal to apply Scenario 2 of the October 2021 STATFOR to the revised RP3 performance plan in Ireland, subject to the following comments.

1. Safety and Capacity

Ryanair supports the unchanged safety and capacity targets for RP3.

2. Costs

Ryanair urges CAR to keep IAA ANSP costs unchanged from the draft performance plans presented in August 2021. ANSPs across Europe failed to effectively reduce costs in line with traffic levels during the COVID downturn, therefore, we do not see a reasonable argument for increasing costs while traffic remains below 2019 levels.

We question the justification for increased staff costs in 2022/early 2023 on the basis that the IAA ANSP's controller training footprint will make it unable to release new controllers to the operation in such a short time period.

Ryanair also requests clarification for the proposed 5% increase in terminal unit rates in 2024 despite traffic forecasts decreasing by only 3%.

3. Environment

While we note CAR's comments that Irish environmental targets are strong compared to union-wide targets, Ryanair believes that union-wide targets are not ambitious enough to motivate ANSPs to satisfy the environmental improvements being pursued by the industry. Ryanair calls for unchanged environmental targets to incentivise the IAA ANSP to lead European environmental performance.

We remain available for any further clarifications required.

Yours sincerely,

Conor Gillardy
ATM Manager