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19th November 2020

Commission for Aviation Regulation
3rd Floor, Alexandra House
Earlsfort Terrace
Dublin 2
Ireland
D02 W773
Email: info@aviationreg.ie

By email

Re: Consultation: Work Plan to Establish an Irish Performance Plan Containing Revised Targets for the Third Reference Period 2020-2024 ('RP3') due 1 October 2021

Dear Sir/Madam,

I refer to the above issue and the CAR's invitation for views published on 4 November.

Ryanair welcomes the work plan developed by the Commission for Aviation Regulation to Establish an Irish Performance Plan Containing Revised Targets for the Third Reference Period 2020-2024 ('RP3'). However, we believe some changes are needed to ensure that all the information needed for an accurate assessment is available to all the stakeholders and the timeline is adequate to discuss the final draft of the Irish Performance Plan.

It is unclear from the description of the work plan if the IAA will also provide an analysis of the overall savings generated thanks to the cost containment measures applied. We consider this information essential to analyse the effectiveness of such measures and the potential impact in airspace user's operation in the years ahead. Our view is that the IAA should provide a detailed assessment of their cost containment plan including the savings achieved and expected over RP3.

Moreover, we ask CAR to evaluate the cumulative gains generated by the IAA when considering the whole of the Second Reference Period 2015-2019 ('RP2'). In their annual monitoring report published in October 2020¹, the EC Performance Review Body (PRB) confirmed that the IAA generated an overall estimated surplus of +93.0 M€2009 for en route activities and +25.2 M€2009 for the terminal activity when considering the whole of RP2. The IAA must use this unacceptable surplus to mitigate the effects of COVID19 impact and reimburse the amount through ATC charges to the airspace users.

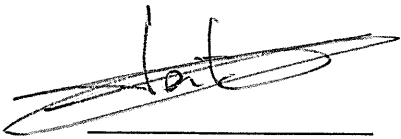
¹ PRB Monitoring Report 2019 and RP2 Overview – 29 Oct 2020

Finally, we think the final consultation for the Irish Performance Plan should be held in July 2021 instead of August 2021, to ensure CAR and the rest of stakeholders have enough time to provide written feedback and clarify open points if needed after the event. Consequently, the consultation documents should be provided in early July 2021 to comply with the new consultation date proposed.

Please do not hesitate to contact us if you want to discuss any point of our position.

We look forward to hearing from you

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Enrique Ventas Garcia', written over a horizontal line.

Enrique Ventas Garcia
ATM Manager