

30 July 2025

Luke Manning  
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by email only: [consultation@iaa.ie](mailto:consultation@iaa.ie)

Dear Mr Manning,

On behalf of Ryanair, we appreciate the opportunity to provide feedback on the consultation regarding the 2024 Actual ANS Costs and the Revised Draft RP4 Performance Plan.

Having reviewed the consultation materials and supporting documents, we would like to provide the following comments and seek clarification on key areas where cost increases, delivery risks, and performance assumptions may impact airlines disproportionately over RP4.

## **1. Cost and Unit Rate Trends (2024–2026)**

The 2025 en-route unit rate is approximately 17% higher than in 2024, and by the end of RP4 it will have risen by nearly 24% compared to 2024 levels, reflecting a sharp and sustained increase in ATC charges on airlines over the period. Ryanair paid over €21 million in combined en-route and terminal ATC charges in 2024, and under the proposed 2026 unit rate, the increase will result in an additional cost of over €670,000 to our passengers. This level of year-on-year volatility places avoidable pressure on airlines, especially in the absence of significant change in traffic or service levels. We would welcome further explanation on what safeguards are in place to ensure that airlines are not paying upfront for capabilities that will only materialise later in the period.

## **2. Staffing and Capacity Measures**

The proposed €10.2m increase in ATCO costs over RP4 reflects a major recruitment drive beyond 2023 baselines. We acknowledge the under-resourcing risk identified by CEPA/THINK but remain concerned about delivery credibility. AirNav's historical performance in staffing and project implementation during RP2 and RP3 indicates that it has not delivered on its budgeted capex. Key elements of the capital programme such as the contingency ATM system and radar upgrades, were not delivered as planned, and ATCO recruitment targets fell short.

We understand that there is a strong focus on staffing throughout the plan and that this is one of the main drivers of the cost increase over RP4. In that context, we would welcome an update or summary on ATCO training, including whether there are any known constraints in terms of recruiting, simulator access, instructor availability, or overall training capacity, and whether the plan to train 123 candidates over RP4 is realistically achievable given current pass/fail rates.

We would also like to better understand what is being done to reach these recruitment and training targets. Additionally, expected retirement rates among ATCOs during RP4 is expected to rise - how these are being accounted for in the staffing plans? Will they be retained to boost training capacity and has this been budgeted for?

### **3. Capital Programme Execution and Efficiency Gains**

We support investments in TopSky and contingency ATM systems. However, given previous under delivery, Ryanair would welcome clear and enforceable delivery milestones along with annual progress reporting across all major RP4 projects.

We understand that automation and system upgrades will enhance controller productivity, and that CEPA/THINK has adjusted staffing needs accordingly. What buffer in staffing levels has been forecast in case of project delay to avoid an understaffing situation? Ryanair supports the approach of aligning staffing and capacity planning with technological advancements, but requests further transparency on how these productivity improvements will be measured and whether failure to realise these benefits would trigger corrective measures or penalties?

### **4. Terminal Charges**

The terminal unit rate is set to rise from €168 in 2025 to €182 in 2029, representing an increase of 8% over the course of RP4. We are particularly concerned by the steep increase in depreciation in 2029, which appears to be driving the terminal cost base upward at the end of the period. This raises questions about the timing and justification of terminal-related capital investments. We would welcome further clarity from AirNav on which specific investments are contributing to this late-stage increase in depreciation, and whether the timing of these costs could be better aligned to avoid concentrated pressure on airlines in the final year of RP4.

### **5. Transparency and Cost Control**

Given the scale of investment and staffing increases proposed, we would expect a clear framework for tracking delivery, cost performance, and benefits realisation. In particular, we encourage AirNav Ireland to provide greater visibility on how support and overhead costs are being allocated, and to commit to annual reporting on key cost drivers.

### **6. Conclusion**

Ryanair is committed to supporting investments that deliver genuine improvements in airspace capacity and performance. However, the step change in costs and unit rates must be matched by equally ambitious improvements in delivery assurance, cost transparency, and performance accountability.

Yours sincerely,



David Graca  
**ATM Manager**