

Mr Huw Merriman
Chair
Transport Committee
House of Commons
London
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REF: CB/104954
03 Mar 2021

Sent by email: huw.merriman.mp@parliament.uk

Dear Huw,

May I thank you and your fellow Committee members most sincerely for your time and hospitality this morning. I hope at least on our panel we were able to answer your questions in a reasonably lucid and concise manner.

I enclose herewith a briefing note on the UK CAA's recent (and still unexplained), policy shift, which has prevented Ryanair UK from maintaining some of its fleet on a wet lease basis, and will as a result, cause the loss of routes and frequencies at a number of UK regional airports, most notably Edinburgh, Liverpool, Luton and Manchester.

The UK CAA is shooting itself in the foot on this and harming the UK's traffic recovery, while at the same time it now pursues criminal cases against UK airlines for bringing passengers into the UK with pre-arrival PCR tests when their test confirmations are not in the English, Spanish, and French languages. What are we supposed to do with inbound German, Italian and Eastern European passengers, none of whom can produce PCR test confirmations in the 3 specified languages?

If we can be of any further service to you or the other members of the Committee, please do not hesitate to contact us.

Here's hoping that the continuing success of the UK vaccine rollout will allow us all to return to normality sooner rather than later.

Sincere thanks,



Michael O'Leary
Group CEO

UK CAA policy shift
in respect of wet-leasing of aircraft by Ryanair UK from an EU airline

Ryanair UK (“RUK”) obtained an Air Operator’s Certificate (“AOC”) and an operating licence from the UK Civil Aviation Authority (“CAA”) in 2018. It has operated one aircraft since and has planned, and offered to the CAA, to grow to 3 aircraft by 1 Apr 2021.

In Feb 2020, the CAA expressed the wish for RUK’s post-Brexit operations to be “balanced” between its own aircraft and wet-leased in aircraft from other Ryanair Group airlines. The CAA said that not more than approx. 50% of RUK’s scheduled operations should be fulfilled by aircraft wet-leased in from other airlines. RUK’s 2021 schedule complies with this condition. In Dec 2020, the CAA unexpectedly advised that it would only be possible for RUK to lease in a number of identified aircraft, up to 50% of its “core UK fleet”, instead of relying on the standard “white list” approach which would allow RUK to lease in any of a list of aircraft pre-approved by the CAA in order to fulfil up to 50% of its scheduled operations.

In the course of discussions with the CAA immediately prior to and after Christmas RUK offered to reduce the white-list from the originally-requested entire Ryanair DAC fleet to approx. 70 aircraft (i.e., the total number of aircraft based in London Stansted, Manchester, Liverpool, Edinburgh and Luton), with the list updated and approved by the CAA on a monthly basis. On 22 Jan the CAA rejected RUK’s white-list application.

In the absence of recourse to white-list based wet-leasing of aircraft from Ryanair DAC, RUK has now been forced to cancel its routes to non-EU destinations as well as UK domestic routes from UK regional airports (Manchester, Liverpool, Edinburgh and Luton) and will only operate routes out of London Stansted. The total **loss of connectivity** to the UK is **13 routes** to Morocco, Ukraine, Montenegro, Norway and UK domestic routes:

S21	RUK’s 5 Jan proposal 3 a/c on AOC 70 a/c on wet-leasing white list		CAA’s “50% policy” 3 a/c on AOC 1 or 2 identified* a/c wet-leased		RUK’s current plan 2 a/c on AOC 1 identified* a/c wet-leased	
	Routes	Weekly freq.	Routes	Weekly freq.	Routes	Weekly freq.
EDI	1	3	0	0	0	0
LPL	2	6	0	0	0	0
LTN	1	4	0	0	0	0
MAN	5	13	0	0	0	0
STN	12	57	10	41	8	28
Total	21	83	10	41	8	28
Wet-lease total	9	26	0	0	0	0
Wet-lease %	43%	31%	0%	0%	0%	0%

* routes cannot be scheduled for an identified wet-leased a/c due to risk of a/c re-positioning or AOGs

The operational flexibility afforded by Ryanair DAC’s fleet being available for lease-in by RUK, as dictated by ad-hoc and schedule requirements, is crucial to RUK.

The total number of flights in its schedule, which RUK is unable to operate with its own fleet of aircraft and for which it requires access to wet-leasing from Ryanair DAC, is miniscule, i.e., an average of **less than 4 daily frequencies in the peak of S21 from 4 UK regional airports**, compared to **approx. 8 daily frequencies that RUK can operate with its own 3 aircraft from London Stansted**. However, these 4 daily frequencies may be scheduled to operate from Manchester, Liverpool, Edinburgh and Luton at the same time.

As Ryanair DAC’s aircraft are constantly being moved around its bases to facilitate crew and fleet currency and minimise delays, it is impossible to assign 4 identified Ryanair DAC aircraft to perform wet-leasing flights for RUK in these 4 bases, setting aside that even this small number would exceed the CAA’s permitted maximum of 50% of RUK’s core fleet at any one time (i.e., 1 or 1.5 aircraft if RUK’s core fleet included 3 aircraft).

The standard white-list approach is therefore the only viable option for RUK, whereby it would be permitted to draw from a wider list of Ryanair DAC aircraft, but within the confines of a schedule approved by the CAA. The schedule’s ratio between flights operated with RUK’s own aircraft and with aircraft wet-leased from Ryanair DAC would remain consistent with the CAA’s 50% policy.