

Written evidence submitted by Ryanair (EEE0001)

1. Introduction

Ryanair Holdings plc, Europe's largest airline group, is the parent company of Ryanair UK, Ryanair, Buzz, Lauda and Malta Air. Carrying 183m passengers p.a. on more than 3,000 daily flights from 91 bases, the Group connects 230 airports in 36 countries, flying 2,400 individual routes. It currently operates a fleet of over 540 aircraft, with a further 410 Boeing 737s on order, which will enable the Ryanair Group to lower fares and grow traffic to 225m p.a. over the next 3 years. Ryanair has a team of over 20,000 highly skilled aviation professionals delivering Europe's No.1 on-time performance, and an industry leading 38-year safety record. Ryanair is Europe's greenest, cleanest, airline group and customers switching to fly Ryanair can reduce their CO₂ emissions by up to 50% compared to the next four largest European airlines.

Ryanair's UK operations contribute £13.8 bn GVA and 98,000 direct and indirect jobs to the UK economy. It carries over 45m passengers pa with 115 UK-based aircraft, serving over 500 routes to, from and within the UK, accounting for more than 20% of all UK air traffic.

In this submission, Ryanair will outline its views on the planned European Entry/Exit arrangements, including the operational impacts and procedures.

2. Background to the European Exit/Entry System initiative

As the Committee will be aware, the European Entry/Exit System ("EES") project involves the electronic recording and storage of vital data, such as the date, time, and location of entry and exit for travellers crossing the borders of EU member states, specifically within the Schengen area.

Under this project, Ryanair is required to, at least 48 hours before a scheduled departure, verify the travel eligibility of passengers by sending verification queries to the EU system to determine their "OK" or "NOT OK" status.

Ryanair is currently working with EU-LISA (LISA = Large-scale IT Systems in the Area of freedom) for the implementation of EES and ETIAS (European Travel Information and Authorisation System). The implementation date has, however, been postponed on three occasions due to the complexity of the programmes and the lack of readiness of border authorities across the EU. The aviation industry has expressed dissatisfaction with the way these programmes have been managed by EU-LISA and currently we are awaiting the commencement of testing, as there are no test environments ready and available for us to use yet.

Below, please find some of the challenges associated with the implementation of EES and ETIAS

3. Detailed actions required for implementation

- Ensuring our system is prepared to meet the timelines set by EU-LISA (EES- potentially autumn 2024)
- Registering all local Departure Control Systems (DCS) for airports that do not use the Navitaire system and establishing effective communication channels to ensure that these airports act upon any "board" or "no board" messages received from authorities, preventing passengers without permission from boarding.
- Providing training to airports to adapt to these changes.
- Notably, multiple entry visas and long-stay visas fall outside the scope of EES, necessitating us to continue performing standard visa checks for passengers holding these documents.
- The procedures for handling system outages and boarding passengers when we cannot receive "board" or "no board" messages remain unclear.
- Carriers' liability charges apply if we allow non-compliant passengers to board.
- Implementing an interactive API message system, distinct from the existing non-interactive API program sent to various EU/Schengen member states.

- Note that the “hard” 48-hour deadline is too long, this will preclude late ticket sales which are an extremely important element of Ryanair’s (and other airlines’) revenues.

4. Conclusion

Overall, this whole project has been delayed multiple times and has been poorly managed. As mentioned above, it is not yet possible to properly test changes to our systems due to delays in providing test environments and many aspects of the system requirements either have not been specified or are simply not clear to us. This makes meeting the requirements very difficult, regardless of the repeated delays in the implementation date.

It will also result in significant duplication of effort because of the potentially high proportion of visas that will not be in scope. This means that we are forced to duplicate systems and processes, so it is a far from ideal arrangement; normally one would expect such a development introducing electronic systems to improve, rather than detract from efficiency.

8 December 2023