

25 June 2026

Mr. Matthew Cherry
Economic Regulation and Competition Policy
Consumers and Markets Group
UK Civil Aviation Authority
Email: economicregulation@caa.co.uk

By email

Re: Review of the Traffic Distribution Rules 1991

Dear Mr. Cherry,

I refer to the CAA's ongoing review of the 1991 Traffic Distribution Rules ("TDRs"). Ryanair maintains our previous position expressed at the beginning of this consultation process in my 23 January 2026 letter.

We regret that CAA has appeared to ignore the core points of our position (which was aligned with many other relevant stakeholders), carrying on with this consultation as a mere formality.

Responding to the CAA's questions in the order indicated in the consultation document (point 4.53):

1. Opinion on CAA's draft advice to revoke the 1991 TDRs

Ryanair strongly opposes the proposal to revoke the 1991 TDRs.

First, London remains severely capacity constrained. Heathrow and Gatwick are effectively full, and the consultation itself confirms that capacity constraints are structural and persistent. In this context, the TDRs provide the only strategic safeguard ensuring that scarce peak-time slots are reserved for the highest-value passenger services. Removing them would eliminate this protection and risk allowing lower economic/social value operations to displace passenger services at the margin.

Second, as discussed in my previous 23 January letter, not only should the TDRs be maintained but Stansted should also be encompassed in the existing rules given it is now the only London airport with meaningful room for growth..

Third, whole-plane cargo flights generate materially lower economic value per slot than passenger services. Passenger operations maximise throughput, connectivity, tourism, and employment, whereas cargo flights are lower-frequency and lower-density. Allowing cargo operations to access peak periods—particularly at Stansted—would directly displace passenger growth, reduce investment incentives, and undermine job creation across the UK aviation sector.

Fourth, this risk is particularly acute in the context of recent and planned investment at Stansted. Significant terminal expansion is being undertaken to facilitate passenger growth. However, once terminal capacity increases, the runway will become the binding constraint. Allowing cargo operations to occupy peak-time runway capacity would therefore undermine the return on that investment by constraining passenger growth precisely when additional capacity is intended to be utilised.

Fifth, environmental and operational considerations also support maintaining the current framework. Cargo aircraft are typically older and noisier than modern passenger fleets. Prioritising newer, quieter passenger aircraft during peak periods delivers better outcomes for local communities, improves environmental performance, and supports operational resilience.

Finally, cargo operators already have access to suitable alternatives. Airports such as East Midlands and Birmingham offer more appropriate freight environments, with greater capacity, dedicated infrastructure, and significantly more flexibility—particularly for night-time operations, which align closely with cargo business models. There is therefore no compelling case for allowing cargo to compete for scarce peak slots at London's constrained passenger airports.

For these reasons, the 1991 TDRs remain necessary, proportionate, and aligned with the objective of maximising consumer welfare and economic value from scarce airport capacity. They should not be revoked. They should be maintained and revisited to ensure that Stansted is included within the framework.

2. Approach to implementation

Without prejudice to Ryanair's opposition to revocation, if the Secretary of State were nevertheless minded to proceed, any change should be subject to a clearly defined transition period.

A transition period is essential to allow airlines, airports, and cargo operators to adjust operational plans, contractual arrangements, and scheduling decisions in an orderly manner. Immediate revocation would create unnecessary disruption and regulatory uncertainty, particularly given the long-term nature of slot allocation, fleet planning, and investment decisions.

A structured transition would mitigate the risk of abrupt market distortions and ensure continuity in the efficient use of capacity while any new framework is implemented.

3. Condition C4 in HAL's Licence

Condition C4 should be maintained.

Maintaining C4 ensures that cargo operations do not displace higher-value passenger services, particularly at peak times when capacity is constrained. This is especially important given that airports rely on passenger-driven commercial income to fund infrastructure & maintain service levels, without C4, the airport could face reduced commercial income, and ultimately a less efficient allocation of scarce capacity.



Eoin Kealy
Director of Regulatory and Competition