



Independent  
Federal Commissioner  
for Anti-Discrimination

Antidiskriminierungsstelle des Bundes, 11018 Berlin

Ryanair Holdings PLC

Mr. Michael O'Leary

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**Ferda Ataman**

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Berlin, 15.09.2025

Dear Mr. O'Leary,

I have been following reports that starting November, Ryanair will cease accepting paper boarding tickets, therefore making smartphone-only boarding passes mandatory. You have stated in several interviews that this measure is supposed to boost efficiency, reduce your company's carbon footprint, and reduce cost. While I commend these goals, this development is also cause for concern.

In a recent interview with the Independent's daily travel podcast, you said that 85 to 90 percent of travellers already show up with smartphones at the airport. My concern is with the 10 to 15 percent who do not. That is still millions of people who for various reasons do not have their boarding passes in digital form. This includes vulnerable groups protected by Germany's equality law, the General Equal Treatment Act, like elderly people, or people with disabilities or chronic illnesses. Many of them either do not have a smartphone or if they do, are not able to use all functions. They may consequently be excluded from travelling with your company or will have to jump through unnecessary loops to provide a digital boarding pass.



In my capacity as the head of Germany's national equality body, I urge you to reconsider your decision and to find a way to extend your digital services while still providing paper boarding passes for those who need them. As currently communicated, your measure otherwise runs the risk of constituting an indirect form of discrimination on the base of age, and/or disability under §19 of the German Equal Treatment Act (Allgemeines Gleichbehandlungsgesetz). I would like to encourage you to come up with and provide a solution to prevent that from happening.

My office remains at your disposal for further exchange on this important matter.

Sincerely,

Ferda Ataman  
Independent Federal Commissioner for Anti-Discrimination  
Head of the Federal Anti-Discrimination Agency