



**RYANAIR HOLDINGS PUBLIC
LIMITED COMPANY**

Airside Business Park, Swords
K67NY94, Dublin

Brussels, 03/12/2024

Re: Extension of Ryanair’s commitments related to information on online check-in and on the ‘priority and hand luggage’ service in the event of a return flight to Belgian, Spanish and Portuguese consumers

Dear Mr O’Leary,

On 14 November 2024, the Italian Competition Authority (Autorità garante della concorrenza e del mercato - hereinafter the “**AGCM**”) issued a press release in which it informed that it “*has closed with commitments the investigation launched against the company Ryanair D.A.C. for possible unfair commercial practice in violation of articles 21 and 22 of the Consumer Code*”.¹

This investigation PS/12689 concerned the following (alleged) practices of Ryanair:

- the failure to provide passengers with relevant information regarding the deadline for online check-in (available only up to two hours before the flight’s departure);
- the failure to provide adequate information about the existence of an additional fee, amounting to 55 EUR, applicable in the event of check-in at the airport after the online check-in time window had closed;
- the failure to provide passengers with relevant information on the ‘priority and hand luggage’ service for the hypothetical purchase of a return flight (*i.e.* no separate indication

¹ PS12689 - Grazie all’attività dell’AGCM, Ryanair rimborserà i consumatori per i costi extra del check-in, <https://www.agcm.it/media/comunicati-stampa/2024/11/PS12689> (last accessed on 14 November 2024) – free translation.

in the unit price of the service for outward and return flights and automatic application by the booking system of the 'priority and hand luggage' service to both the outward and the return flights, without the consumer having immediate knowledge of that choice nor of the prices individually applied).

To address the concerns expressed by the AGCM in the Initiation Communication dated 14 December 2023, Ryanair has expressed its intention to undertake the commitments attached to the AGCM's decision as published on its website, to which this letter fully refers.²

Euroconsumers welcomes the adoption and forthcoming implementation by Ryanair of these commitments, which are intended to enhance the information provided to Italian consumers on different services and related costs during the online flight booking process on Ryanair's website and app. These commitments also provide consumers with substantial redress for the illegitimate expenses they have incurred.

In line with this approach aimed at ensuring a better compliance of Ryanair's commercial practices with consumer rights and European law, Euroconsumers kindly asks (1) to extend the benefit of these commitments, under the same terms and conditions as accepted by the AGCM (including the timing for implementing them), to Belgian, Spanish and Portuguese consumers, and (2) to send confirmation of this extension as soon as possible.

Consumers in these countries should not receive a treatment different from that of Italian consumers, and we are confident that Ryanair will agree with the importance of avoiding discrimination at the European level.

Should you fail to respond or deny the request within thirty days of receipt, we will have no alternative but to bring the matter to the attention of the competent national authorities, requesting them to issue an alert to the CPC network to ensure a harmonized resolution at the European level.

For the sake of clarity, Euroconsumers wishes to emphasize that the positive reception of these measures does not in any way alter its position regarding Ryanair's hand baggage policy and its view that the policy is illegal under applicable European law, namely Regulation No 1008/2008 of 24 September 2008 on common rules for the operation of air services in the Community as interpreted by the Court of Justice.³

² Formulario per la presentazione degli impegni ai sensi dell'art. 27, comma 7 del Codice del consumo, dell'art 8 comma 7 del d.lgs.145/2007 e dell'art. 9 del Regolamento sulle procedure istruttorie in materia di tutela del consumatore, Proposta di impegni presentata da Ryanair DAC, https://www.agcm.it/dotcmsdoc/allegati-news/PS12689_Formulario_impegni_omi.pdf (last accessed on 14 November 2024).

³ See Euroconsumers' letters to Ryanair dated 2 July 2024 and 3 October 2024.

Sincerely

Marco Scialdone
Head Of Litigation
Euroconsumers

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Empower people,
improve the market.

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Empower people,
improve the market.

Julie Frère

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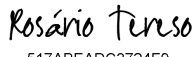
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