

RyanAir

Oslo, 1. December 2022

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## Regarding deceptive design on your website

To whom it may concern,

Forbrukerrådet (The Norwegian Consumer Council) is an independent consumer interest organization that helps consumers and works to influence public authorities and private enterprises in a consumer-friendly direction.

Over many years, the Consumer Council has documented and analyzed the use of deceptive design, which is used to trick consumers into spending more time and money than planned, or to share more personal data than what is in the consumers' own interests. Deceptive design exploits emotional and cognitive biases, for example by exploiting that people have a tendency to assign higher value to products and services that appear to be valued by others, or that appear scarce.

In the past months, the Consumer Council has looked at websites and apps targeted at Norwegian consumers, and that employ deceptive design patterns. The research has predominately been based on tips and suggestions from Norwegian consumers.

The report containing the results of the research can be found here:

<https://www.forbrukerradet.no/siste-nytt/bruker-design-til-a-lure-oss-for-tid-penger-og-personopplysninger>

RyanAir is one of the companies that the Consumer Council believes is using deceptive design, including when booking plane tickets on the website.

When choosing the cheapest tickets, consumers have to actively choose to only order one small hand luggage, which triggers a warning that if the luggage is too



large, this may include an extra fee of up to £69.99. This sum may be as high as the entire price of a one-way ticket.

The screenshot shows a flight booking interface with the heading "Velg hvilken type bagasje du ønsker å ta med deg om bord\*" (Select which type of baggage you want to take with you on board\*). Below the heading, there are two main options: "Kun én liten håndbagasje" (Only one small handbag) and "Prioritert & 2 Håndbagasjer" (Priority & 2 Handbags). The "Kun én liten håndbagasje" option is selected and priced at Nkr152,00. A warning box is overlaid on the interface, stating: "Dersom du tar med deg ekstra bagasje, eller om bagasjen din er for stor til å passe under setet, belastes du en avgift på opp til € 69,99 eller tilsvarende i lokal valuta ved ombordstigningsgaten." (If you take extra baggage, or if your baggage is too large to fit under the seat, you will be charged a fee of up to € 69.99 or the equivalent in local currency at the boarding gate.) The interface also includes a "Verifisert av Ryanair" (Verified by Ryanair) badge and a "Legg til fra Nkr152,00" (Add from Nkr152,00) button.

Consumers also receive a warning about it being smart to book an additional piece of 20 kg luggage in order to “avoid paying up to £50 at the airport”.

The screenshot shows a flight booking interface with the heading "Trenger du pakke mer?" (Do you need more packages?). Below the heading, there are two main options: "10 kg bagasje" (10 kg baggage) and "20 kg bagasje" (20 kg baggage). The "20 kg bagasje" option is selected and priced at Nkr289,00. A warning box is overlaid on the interface, stating: "Kjøp nå og unngå å betale opptil € 50 på flyplassen" (Buy now and avoid paying up to € 50 at the airport). The interface also includes a "Legg til fra Nkr168,30" (Add from Nkr168,30) button and a "Legg til fra Nkr289,00" (Add from Nkr289,00) button.

The choice to receive newsletters via e-mail, text message and push alert is preselected. This exploits the fact that consumers are naturally predisposed to assume that preselected alternatives are useful or necessary. It is also easy for consumers to miss that these alternatives are preselected.



 **E-post** linn.hogaasen@forbrukerradet.no  
Lagre e-post

Landskode \*  47  Telefonnummer \*


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Ryanair-abonnenter får første tilgang til eksklusive rabatter på flyvninger og produkter samt den nyeste informasjonen om nye destinasjoner, kun tilgjengelig gjennom markedsføringsmeldinger. Hvis du ikke ønsker å motta disse tilbudene via e-post, tekstmelding eller push-varsel, fjerner du merket i boksen.

Send flyinformasjon på SMS for **Nkr41,16**





When presented with the choice of whether or not to purchase travel insurance along with the ticket, at least when booking a ticket to Great Britain, consumers are informed that the “EU recommends that all European citizens that travel to Great Britain purchase travel insurance before they travel”. If they still do not wish to purchase travel insurance, consumers actively must choose “I do not want to be insured”. This design exploits that people are influenced by how choices are presented and plays on consumers’ possible worry that something may go wrong on their trip. Additionally, consumers who already have travel insurance may be confused by the wording and believe that they need additional insurance, although this would be superfluous.



**Nyt London uten bekymringer**

 Velg om du vil ha reiseforsikring eller ikke

 EU anbefaler at alle europeiske borgere som reiser til Storbritannia kjøper reiseforsikring før de reiser.

**Insurance Plus** Fra / per person  
**Nkr196,00**

-  Medisinske utgifter opptil **€150 000**
-  Personlige eiendeler opptil **€1 500**
-  Kansellering for uventede omstendigheter opp til **€500**
-  Billettrefusjon

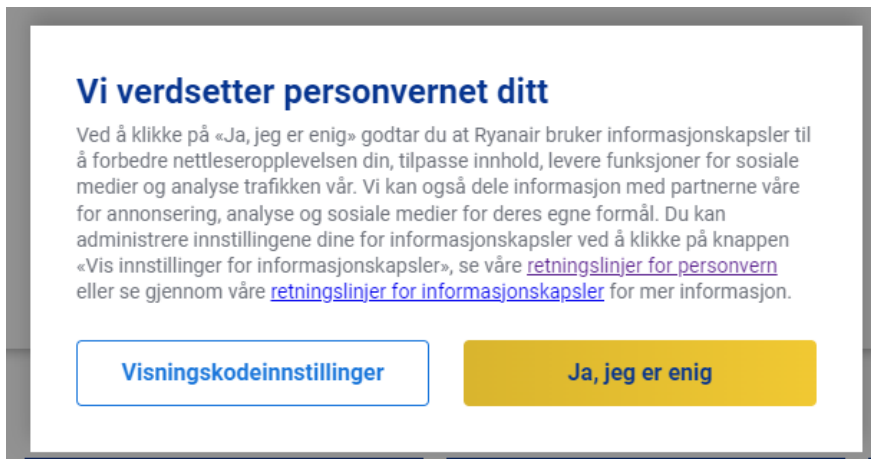
Levert av:   Kun for personer bosatt i Norway | [Se retningslinjer](#)  
Ved å legge til forsikring bekrefter jeg at jeg har lest og godtar innholdet i IPID-dokumentet

**Jeg ønsker ikke å være forsikret**  
Ryanair anbefaler at alle passasjerer skaffer seg reiseforsikring

As far as the Consumer Council could find, it is not possible to delete a RyanAir user account without sending an e-mail to the company. It should be as easy to delete a user account as it is to create the account in the first place.



The Consumer Council also emphasizes that RyanAir has a particularly confusing cookie banner, where it is quite difficult to understand how one may decline to accept cookies. In particular, the Norwegian word “Visningskodeinnstillinger” is very difficult to understand. It should also be as easy to decline as it is to accept cookies.



The Consumer Council requests that you go through the aforementioned examples, in addition to other consumer-facing interfaces in your control, and make sure that you no longer use deceptive design. Advice on how to do this can be found in the industry-facing guidelines that are named in the report.

As a part of the Consumer Council mapping of deceptive design, YouGov has conducted a survey of Norwegian Consumers about their attitudes and experiences with deceptive design. The survey shows that consumers react quite negatively to deceptive design, and that many lose trust in businesses that use them. Additionally, many consumers report that they have considered quitting, or actually stopped using websites and apps where they notice the use of deceptive design.

With this letter, the Consumer Council aims to make RyanAir aware that many of the types of deceptive designs described in the report are, in the Norwegian Consumer Council’s view, in breach of several rules and regulations. The relevant legal provisions are described in the report.



The Norwegian Consumer Authority, which enforces the Marketing Control Act and other consumer law in Norway, is in copy on this letter.

We look forward to hearing back from you.

Regards,

Forbrukerrådet

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