## Consumer Protection Cooperation (CPC) network action on airlines' COVID-19 related cancellation practices

## Implementation table submitted by Ryanair

Date: 29/03/2022

## [NB: The Commission and CPC authorities may decide to publish this implementation table]

In the context of the CPC network's coordinated investigation into airlines' COVID-19 related cancellation practices, 16 major airlines operating on the EU market have made wide-ranging commitments to clear their reimbursement backlogs, offer cash reimbursement for unused vouchers that had been pushed on consumers in the early stages of the pandemic and better inform consumers about their cancellation-related passenger rights.<sup>1</sup>

This implementation table outlines the commitments made by Ryanair, the measures taken by Ryanair to implement its commitments, the state of play of implementation as well as any issues encountered by Ryanair that still need to be resolved in order to achieve full implementation.

Commitment	Measures taken by the airline	State of play of implementation / currently remaining issues
Clear remaining     reimbursement backlog by     September 2021	Due to increased cancellations arising out of Covid-19, we deployed additional resources to clear our reimbursement backlog in a timely manner. The creation of a specialist Covid-19 taskforce by Ryanair – whose sole purpose was to handle refunds arising from Covid-19 cancellations – greatly assisted with this.	Completed.

<sup>&</sup>lt;sup>1</sup> <u>Airlines: reimbursement after flight cancellations (europa.eu)</u>

	Restoration to normal operations, including the processing of refunds on a daily basis, ensures Ryanair maintains its position of no reimbursement backlog.	
2. Refund passengers within 7 days as required under EU law (at the latest from 1 September 2021 onwards, since there should be no more reimbursement	Ryanair remains compliant with this commitment and confirms it refunds passengers within 7 days in accordance with EU261 obligations.  The current average time of reimbursement	Completed.
backlog from that date on [see point 1 above])	is less than 7 days. We regularly monitor our average reimbursement time and implement changes to our refund processes (particularly in light of recent learnings from the pandemic), to ensure compliance with our obligations under EU261.	
	Normalised cancellation volumes and fully operational head office functions mean that complying with this legal requirement does not pose a challenge as it did during the Covid-19 crisis.	
3. Provide clear information to consumers about their passenger rights in the event of a flight cancellation by the airline	All passengers whose flights are cancelled receive an email notification that provides all necessary information on passengers' rights and options available. The same email also provides a link to Ryanair's Art 14(2) Notice, in compliance with EU261.	Completed.
	Customers may also find information about passenger rights in the event of cancellation on our website, in the Help Centre, at the	

4. Present the different options the passenger has in the event of a flight cancellation by the airline (rerouting, refund in money and – if offered by the airline – refund in a voucher), with equal prominence on the	link: <a href="https://help.ryanair.com/hc/en-ie/articles/360017824958-Flight-Cancellations">https://help.ryanair.com/hc/en-ie/articles/360017824958-Flight-Cancellations</a> These notifications and notices are regularly reviewed to ensure the highest standard of message clarity.  All options available to the passenger are presented with equal prominence in our notification e-mails (please refer to question 3 above), as well as on our website.  We have a section of our website specifically dedicated to "Disruptions and Refunds" in the Ryanair Help Centre, which is approached from accordal links allowed as a pleased as a section of the placed as a section of the	Completed.
websites, e-mails and other communication to passengers	is accessible from several links placed on the Ryanair homepage (see here: https://www.ryanair.com/ie/en/useful-info/disruptions-and-refunds). With specific reference to passengers who have initiated the reimbursement process, all relevant information is now available in the dedicated "Refund Hub" section of our website (https://www.ryanair.com/ie/en/refundfaqs/).  We are conducting an ongoing review of our website cultures to ensure consistency	
5. Clearly distinguish in the	across the Ryanair network.  Ryanair's cancellation notification email	Completed.
communication to	clearly informs passengers that they have	
passengers flight	the right to choose between the options	
cancellations by the airline	indicated in the email, and also provides	

(and the passenger's ensuing statutory rights) from flight cancellations by the passenger (and possible contractual rights that the passenger may have in those cases under the airline's terms and conditions of carriage)	passengers with a link setting out a full text of their EU261 rights (the Article 14(2) Notice).  Ryanair's GTCCs make it clear that the right to reimbursement for flight cancellations is statutory, rather than a gesture of goodwill, and that it is only available if it is Ryanair, rather than the passenger, who has cancelled the flight.	
	Furthermore, the section "Disruptions & Refunds" (https://www.ryanair.com/ie/en/useful-info/disruptions-and-refunds) available from the Ryanair Help Centre, which is accessible from several links placed on the Ryanair homepage, includes extensive information on passengers' right to request a reimbursement under EU261 in case of flight cancellation by the airline.	
	The circumstances where Ryanair accepts refund requests for flight cancellations made by the passenger, rather than Ryanair, are clearly detailed in our GTCCs (Art 10) as well as on our dedicated web page available here: <a href="https://help.ryanair.com/hc/en-ie/articles/360017824978-Refund-Policy">https://help.ryanair.com/hc/en-ie/articles/360017824978-Refund-Policy</a> .	
6. Offering reimbursement in money to passengers holding unused vouchers that had been pushed on	Ryanair's passengers whose flights were cancelled due to Covid-19 were always offered the choice between receiving reimbursement in the form of a travel	Completed.

them (i.e. issued without the passenger having an effective choice to opt for reimbursement in money instead).	voucher or in cash. Since November 2021, we have been sending "Reminder Emails" to Covid-19 Voucher holders, providing them with the choice between retaining their voucher or converting it into cash (giving equal prominence to each option) one month prior to expiry.	
	Passengers who opted to extend their voucher received a voucher extension confirmation email while passengers who opted for cash were refunded to the original payment method used to make the booking within 7 days.	
	In line with our commitment, the Reminder Email specified in a clear and transparent manner that passengers who did not respond, would be automatically placed in the queue for a cash refund. Where the passenger did not respond to the Reminder Email, the relevant booking was placed in the queue for an "auto-refund" of any remaining voucher balance.	
7. Inform passengers about the possibility of requesting a refund directly from the airline and any conditions for requesting a direct refund on their websites, for passengers who booked their flights through an	For safety and security reasons, passengers who booked their flight via an unauthorised intermediary and request a refund directly from us are required to complete customer verification before their refund can be processed. Such passengers can either verify their identity using online verification	Completed.

## **intermediary** and are experiencing difficulties

or manually using our customer verification form.

Alternatively, the unauthorised intermediary may avail of our letter of authority process to claim any refunds already paid to the passenger.

Additionally, we have an "OTA Information Hub" on our website dedicated to informing customers about the risks associated with unauthorised intermediary bookings, and clear guidance on how to claim a refund if the passenger has booked through an unauthorised intermediary.

On 30 September 2021 we issued an "unauthorised intermediary reminder email" to unauthorised intermediary bookings with outstanding cash refund requests, reminding of the Letter of Authority and Customer Verification processes which can be availed of to obtain a cash refund. In addition, we have updated our "OTA Information Hub

(https://www.ryanair.com/ie/en/online-travel-agents/) to allow passengers who booked through an unauthorised intermediary to "identify themselves" to Ryanair in order to update their contact details in our reservation system.