



FLY LIGHT, PAY HEAVY

targeted airlines and identified practices (Annex)

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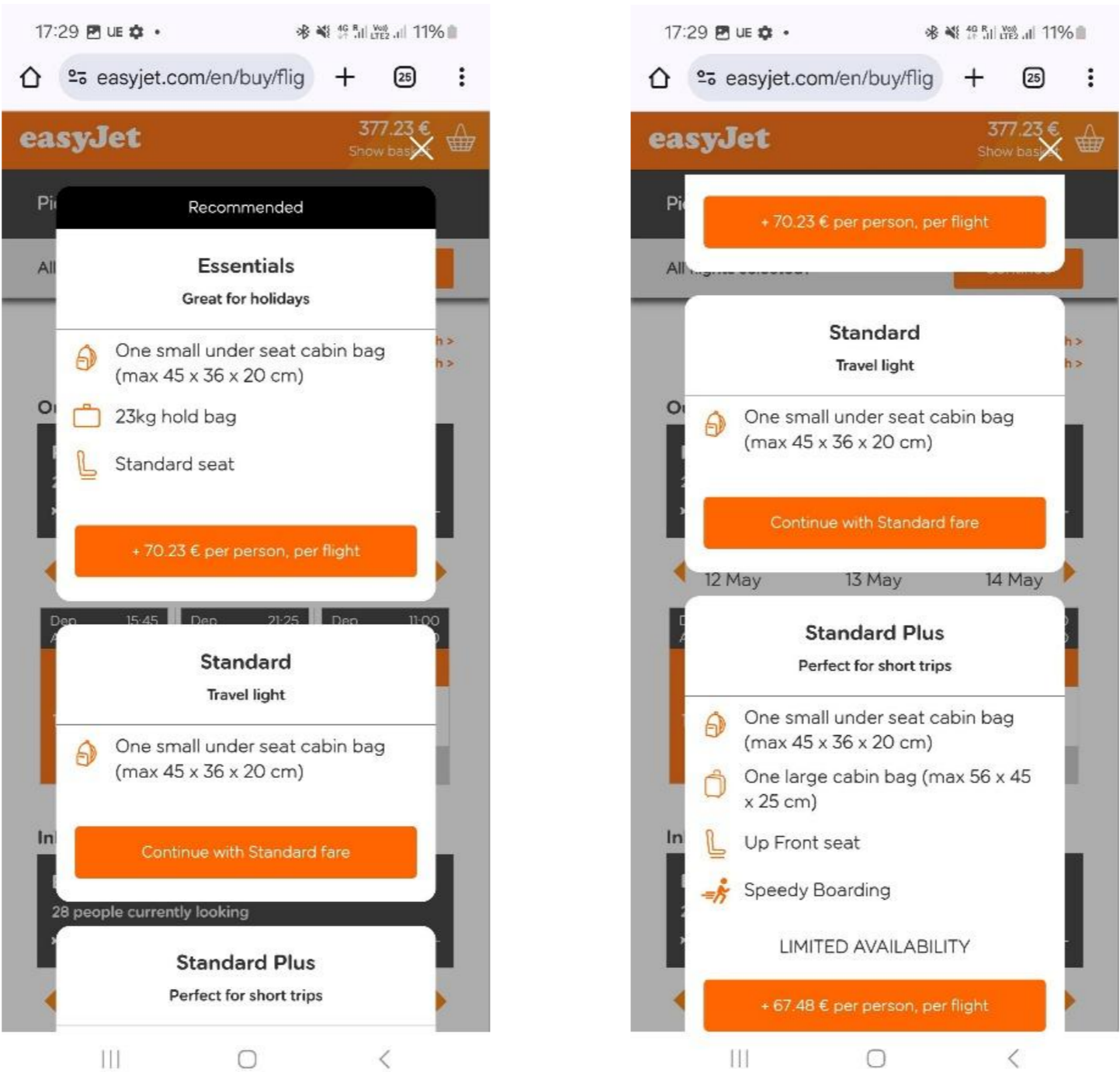
g) Wizzair 17

a) EasyJet

Key figures and data:

- EasyJet impose fees varying on the route selected, flight and time of booking. They range from 5.99 £ (Approx 7.1€) and the maximum amount is not indicated¹. With regards to fees for hand baggage applied directly at the airport, a single fee, called Airport bag fee, of £48 € is applicable².
- Number of passengers potentially affected in 2024 only: 89.7 million³.

Figure 1: EasyJet - Composition of ticket options. Only a "small under the seat hand baggage" in the "Standard ticket" (45x36x20cm)

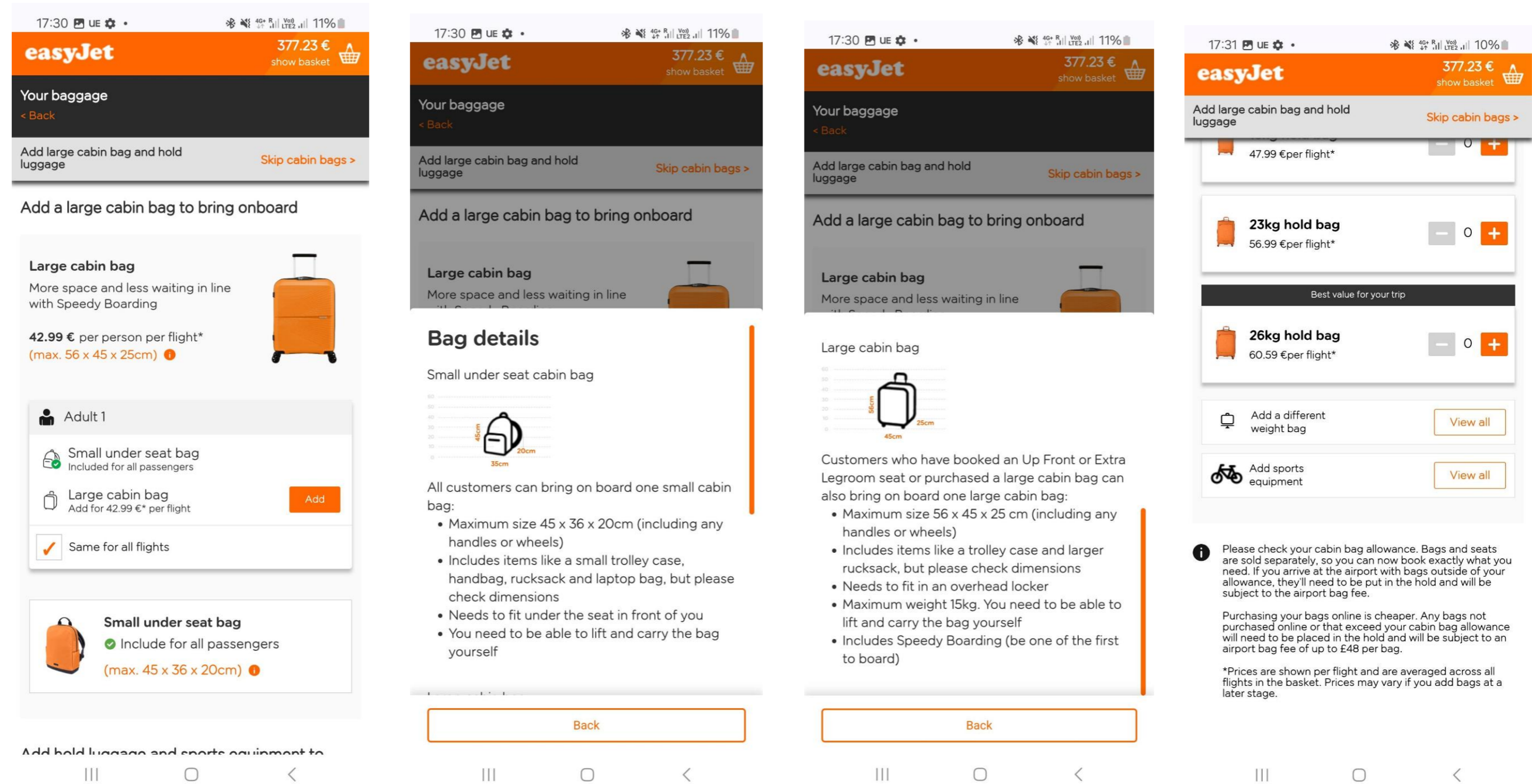


¹ See EasyJet Terms and conditions, "fees and charges" webpage, available [here](#), last consulted on 18 March 2025.

² See Figure 2.

³https://s203.q4cdn.com/522538739/files/doc_financials/2024/ar/Dec/easyJet_AR24_web.pdf, last consulted on 18 March 2025.

Figure 2: EasyJet – Booking process highlighting consumers that they only benefit from a “small under the seat hand luggage” and of the consequences for non-buying an extra (48 pounds or 58€ per extra luggage depending on the language).

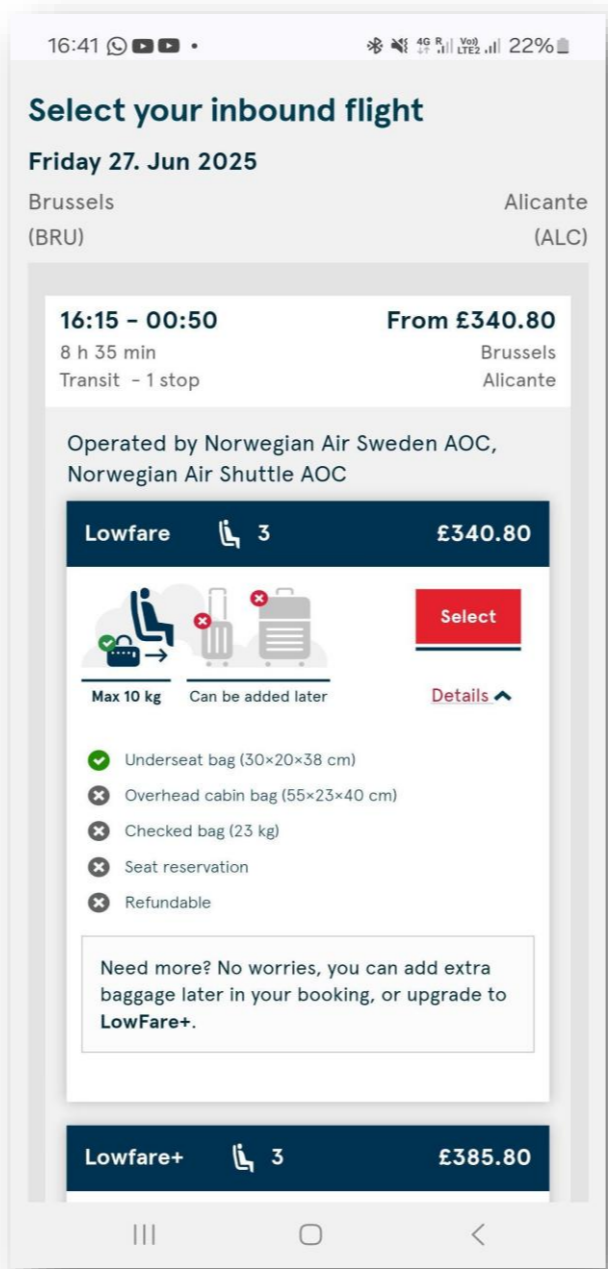


b) Norwegian Air Shuttle Airline

Key figures and data:

- Norwegian Airline applies fees depending on the routes (for domestic flights, they can be up to 12.90 €/£ and for international flights between 14.90 and 24.90 €/£⁴. Bags are charged per item, per leg.
- Number of passengers potentially affected in 2024 only: 27.75 million⁵.

Figure 3: Norwegian Airline Booking process indicating that only a "small under the seat luggage" is available in the "Low Fare" ticket – (30x20x38cm).



⁴ <https://www.norwegian.com/uk/booking/booking-information/optional-charges/>, in English, last consulted on 18 March 2025.

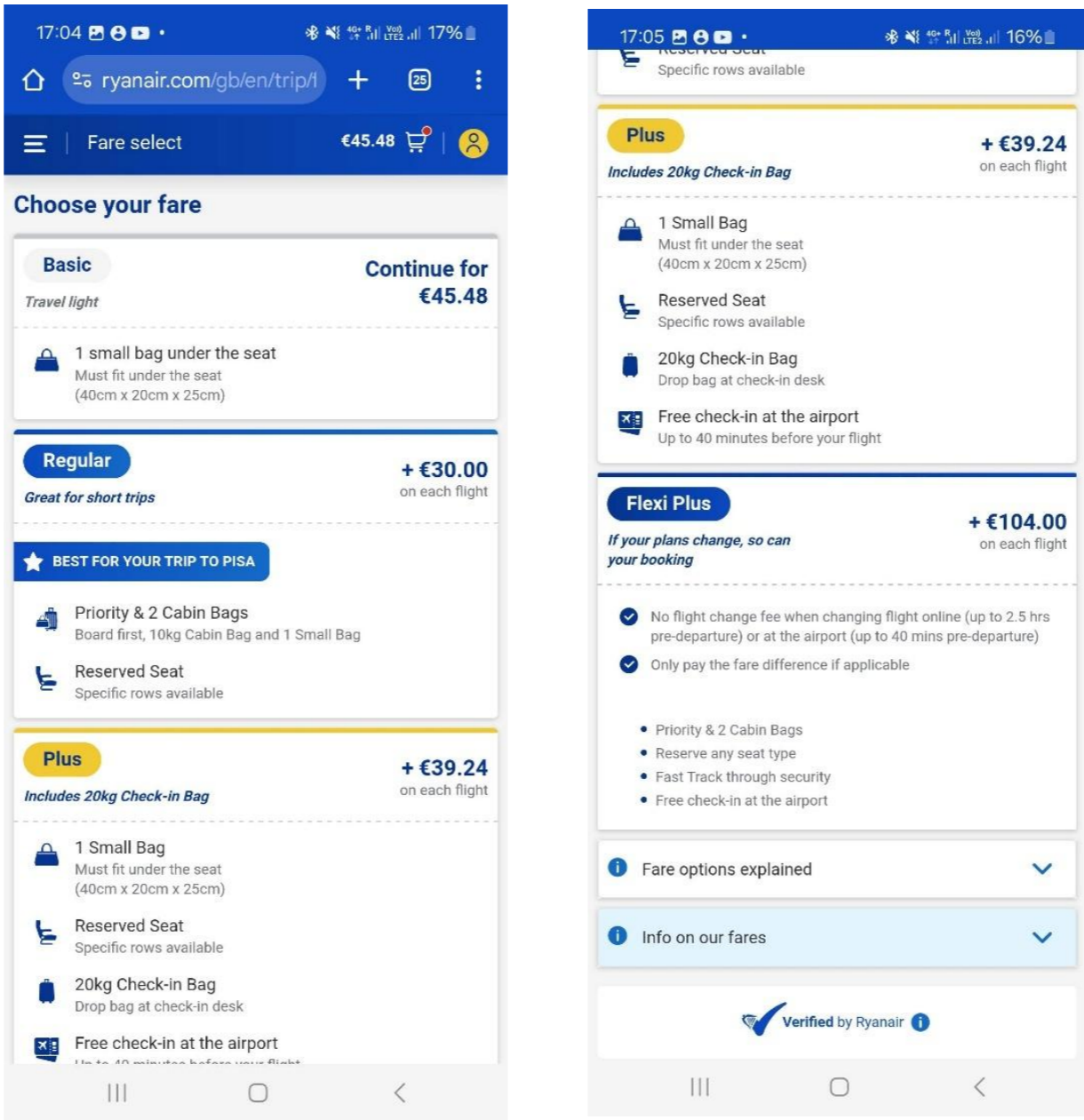
⁵ https://media.uk.norwegian.com/tag/traffic-figures?tags_tab=stories, last consulted on 18 March 2025.

c) Ryanair

Key figures and data:

- Ryanair applies fees depending on the route and selected travel dates. Fees may also depend on whether they are added during the booking process or at a late stage, at the airport. They range from € /£6 - € /£36 at the time of the booking and € /£20 - € /£60 post booking/at the Airport”, respectively (Priority & 2 Cabin bags)^{6 7}.
- Number of passengers potentially affected in 2024 only: 197.1 million⁸.

Figure 4: Ryanair booking process highlighting that only a “small bag under the seat” is included in the “basic fare” (40x20x25cm)



⁶ See Figure 6 Ryanair “[table of fees](#)”, last consulted on 18 March 2025.

⁷ See Ryanair [terms and conditions](#), last consulted 18 March 2025.

⁸ <https://corporate.ryanair.com/facts-figures/key-stats/>, last consulted on 18 March 2025.

Figure 5: Prompts on consumers encouraging them to pay for an additional “cabin luggage” emphasizing several times the consequences for oversized or if consumers bring a second piece of hand baggage (extra of 75€ at the boarding gate).

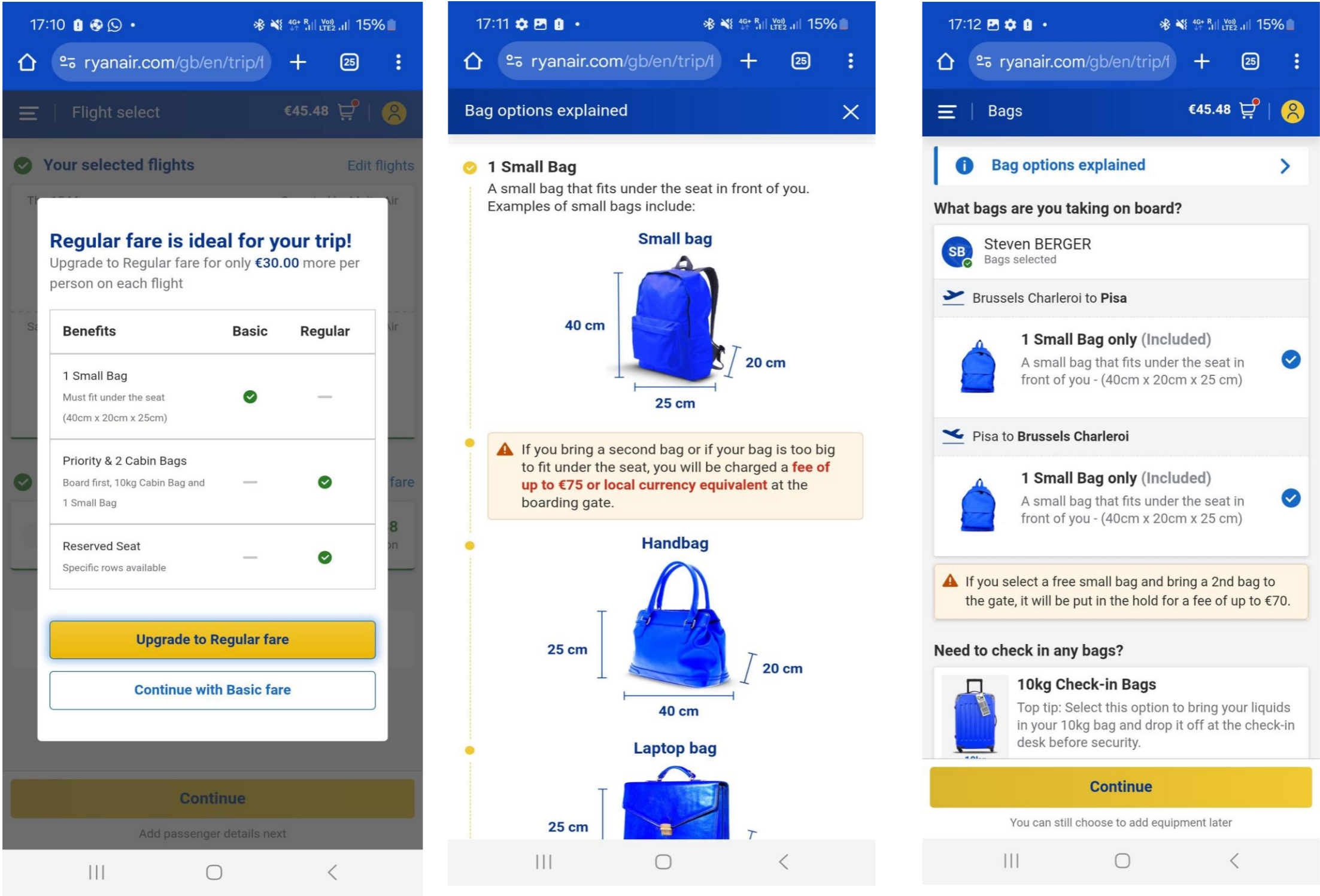


Figure 6: Ryanair "Table of Fees" in their Terms and Conditions - (Link last consulted on 18 March 2025)

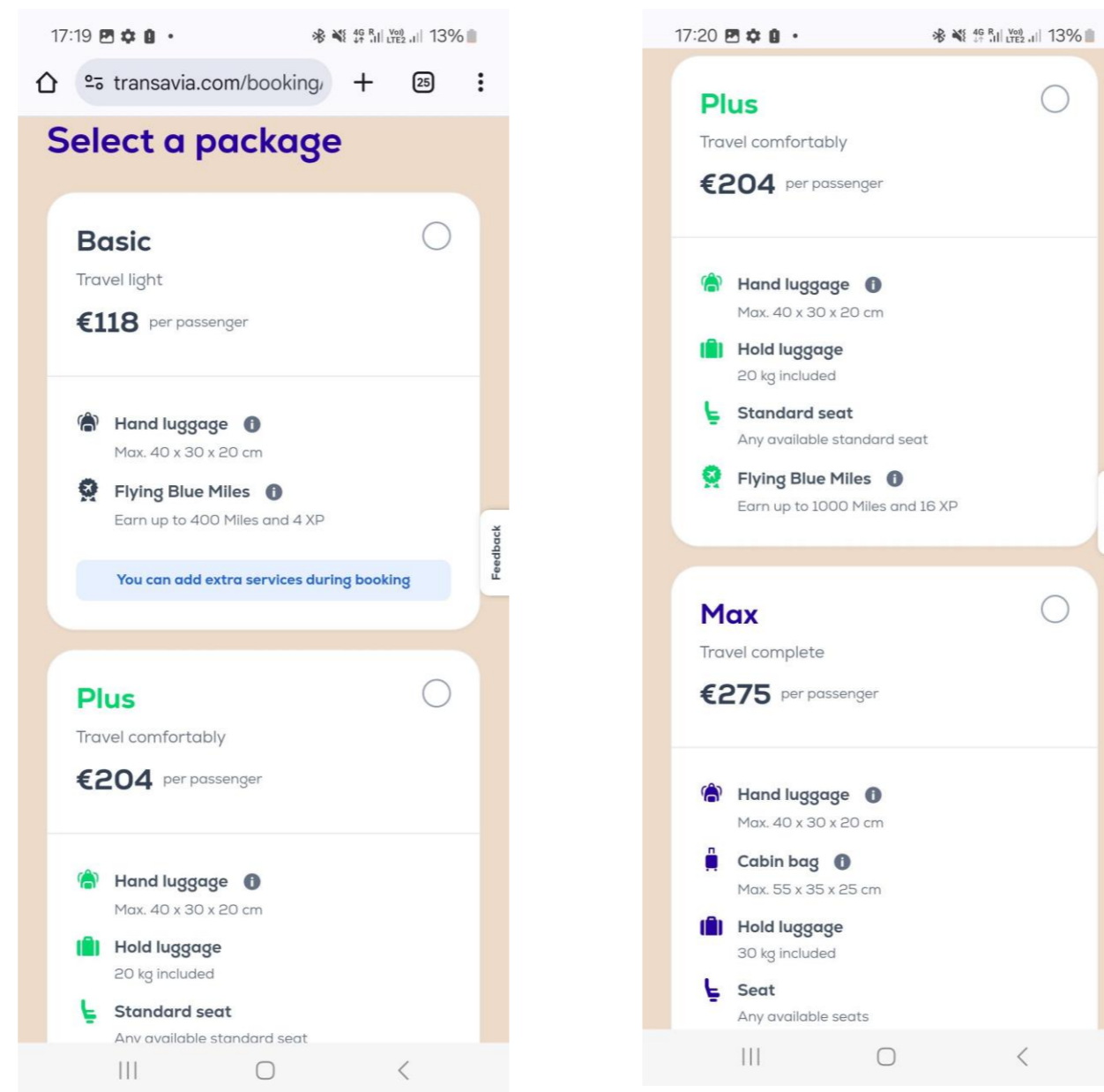
Baggage	At the Time of Booking ⓘ	Post Booking/ ⓘ Airport	More info
Small Bag	Free	Free	
Priority & 2 Cabin Bags Pricing between	€/£6 - €/£36	€/£20- €/£60	Fee varies depending on the route and travel dates selected.
10kg Check-in Bag Pricing between	€/£9.49 - €/£44.99	€/£23.99 - €/£44.99	Fee varies depending on the route and travel dates selected. Non-priority customers who have not added a bag to their booking can still purchase a 10kg Check-in bag at the airport bag drop desk for €/£ 35.99-€/£40. Non-priority customers who bring their 10kg Check-in bag to the boarding gate may check it in against payment of a fee of €/£ 46.00 - €/£ 60.00.
20kg Check-in Bag Minimum and maximum charges per item per flight when bought online	€/£18.99 - €/£59.99 (per flight)	€/£39.99 - €/£59.99 (per flight)	Fee varies depending on the route and travels dates selected. Passengers who have not added a bag to their booking can still purchase a 20kg Check-in bag at the airport bag drop desk for £/€ 59.99. Customers who bring an oversize bag (over 55x40x20cm) to the gate may check it in upon payment of a fee of £/€ 70.00 - £/€ 75.00.
Excess Baggage Fee Per Kilo	n/a	€/£13	The price at the airport/call centre/kiosk is €/£13 per extra kilo.
Fee for Special Declaration of Valuable Baggage	n/a	€/£50	Allows for a higher limit on carrier liability.

d) Transavia

Key figures and data:

- Transavia applies fees depending on the destination and the availability of the fare, flight and time of booking⁹. For Transavia flight numbers starting with “HV” (operated by Transavia Airlines C.V.), rates range from €14 - €32 per one-way trip. For Transavia flight numbers starting with “TO” (operated by Transavia France S.A.S.), rates start from €23 per one-way trip and from €39 on flights to/from Senegal.
- The rates for adding a cabin bag at the check-in counter for Transavia flight numbers starting with HV range between €29 and €47 per one-way trip. The rates for adding a cabin bag at the check-in counter for Transavia flight numbers starting with TO start from €60 per one-way trip.
- Number of passengers potentially affected in 2024 only: 9 million¹⁰.

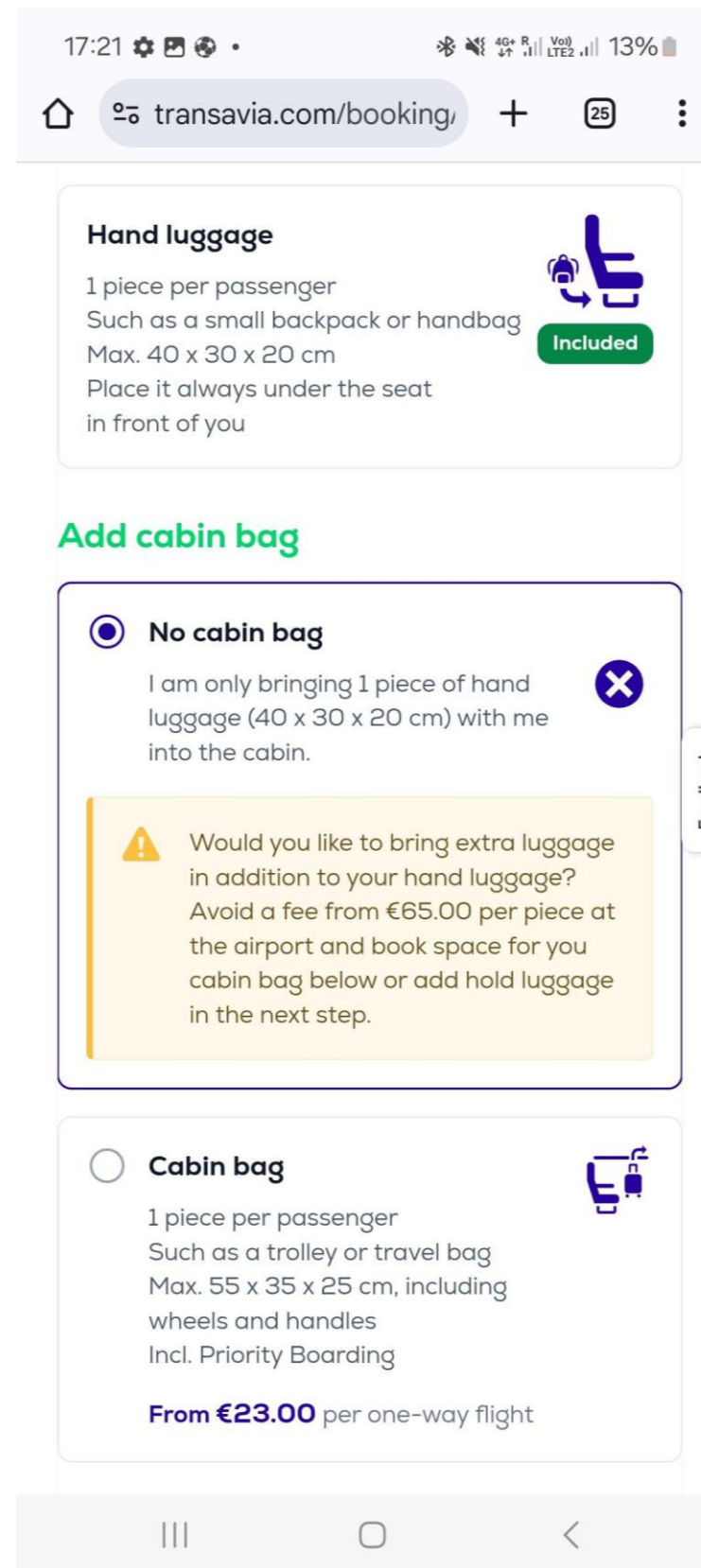
Figure 7: Transavia - Details of the different ticket components highlighting that only a small “hand luggage” is available in the “Basic Fare” – (40x30x20cm).



⁹ See Transavia webpage, “What are the cabin bag fees?”, available [here](#), last consulted on 18 March 2025.

¹⁰ <https://www.airfranceklm.com/en/our-strengths/transavia> , last consulted on 18 March 2025.

Figure 8: Prompts on consumers encouraging them to pay for an additional “hand luggage” emphasizing the consequences if consumers bring a second piece of hand baggage (extra of 65€ at the boarding gate).

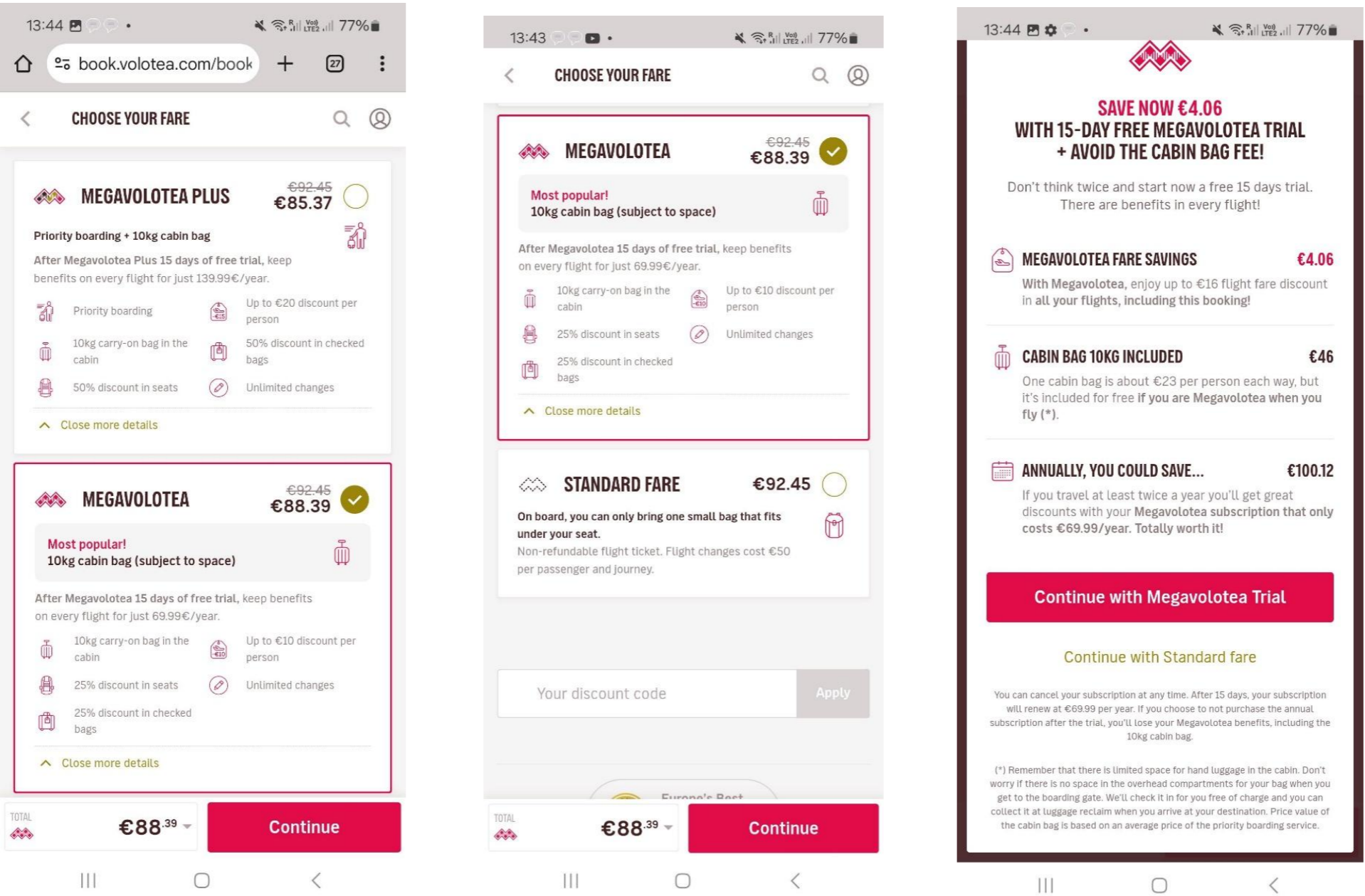


e) Volotea

Key figures and data:

- Volotea applies varying fees depending on the destination, booking date, or whether services are added during the booking process or subsequently at the airport. Only consumers who subscribed to Megavolotea (69.99€/year) and Megavolotea Plus (139.99€/year) have a “cabin baggage 10kg” included in the basic ticket fare. Otherwise, consumers must add a “priority boarding from 9€” and are forced to bundle additional services. Bringing a “cabin bag” into the cabin without priority boarding costs €65 per passenger and per flight (130€ extra in total)¹¹.
- Number of passengers potentially affected in 2024 only: 36.8 million¹².

Figure 9: Volotea - Details of the different ticket components highlighting that only a “small bag that fits under the seat” is allowed in the “standard fare” – (40x30x20cm).



¹¹ See Volotea - Services fees" webpage, [link](#) last consulted on 18 March 2025.

¹² https://static.vueling.com/corporative7/media/2037/eng_vu23-comprimido.pdf, last consulted on 18 March 2025.









Figure 10: Volotea - Example of terms and conditions applicable to hand baggage policies of the carrier allowing only a “handbag under the front seat” – (40x30x20cm).

LUGGAGE FOR YOUR TRIP

Make sure you've got enough room for everything you need for your trip

WHAT BAGGAGE IS INCLUDED IN MY FARE?

Remember that if you do not include priority boarding, you will have to stick to the basic baggage allowance of your fare.

STANDARD	 MEGAVOLOTEA	 MEGAVOLOTEA PLUS
 1 hand bag under the front seat ✓ Free	 1 hand bag under the front seat ✓ Free	 1 hand bag under the front seat ✓ Free
 Cabin baggage 10kg ⚠ Not included	 Cabin baggage 10kg (subject to space*) ✓ Free	 Cabin baggage 10kg ✓ Free

(*) Only for Megavolotea and Megavolotea Plus members, if there is no room for your suitcase in the overhead compartments when you arrive at the boarding gate, we will lower it into the hold of the aircraft free of charge and you will be able to collect it from the baggage belts on arrival at your destination.

Figure 11: Volotea - Prompt pushing consumers to buy an extra “10kg trolley” and emphasizing the possible consequences of not buying it (65€ extra per passenger per flight).

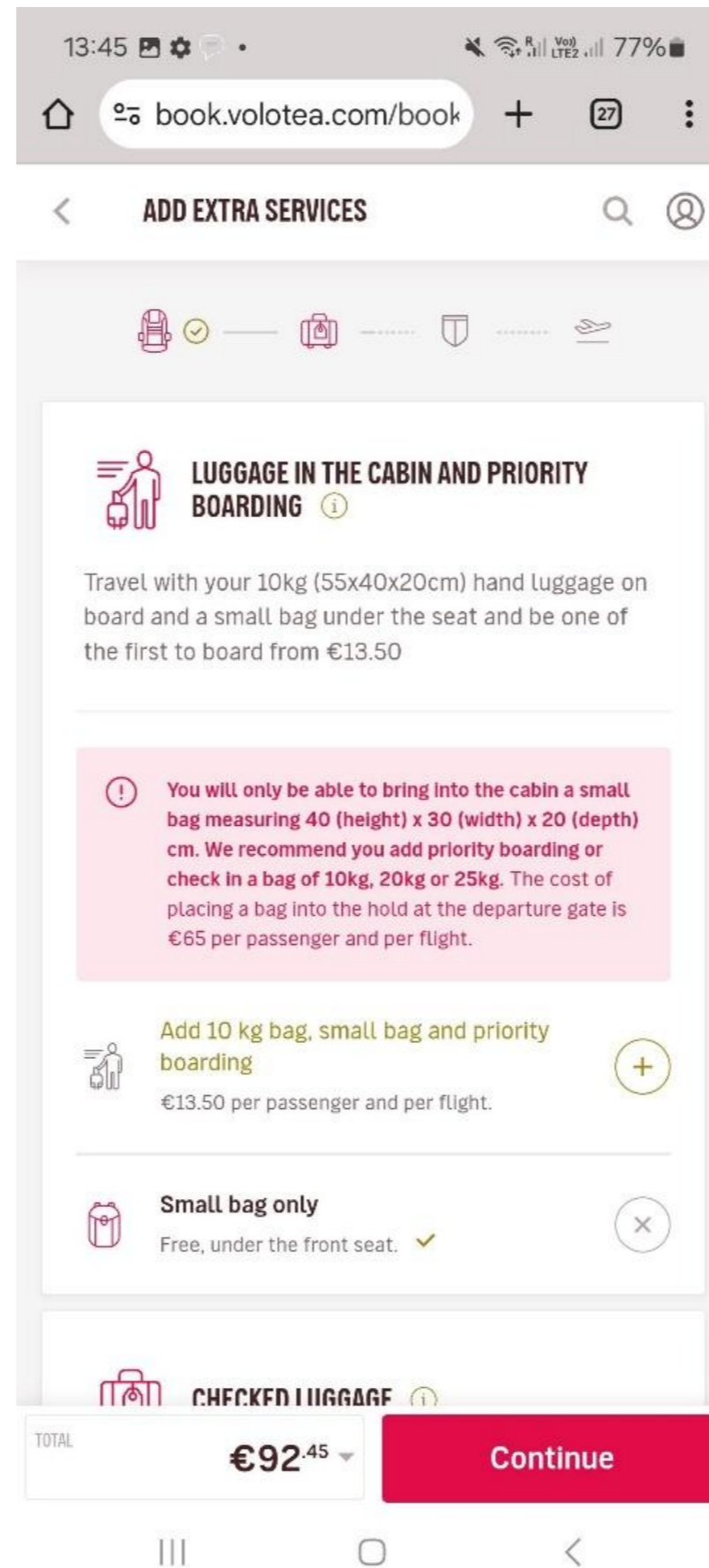
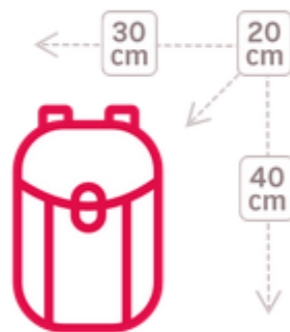


Figure 12: Volotea - New prompt recalling that consumers have a "small bag" allowed and pushing consumers to buy extra "priority boarding" to benefit from another hand baggage. The 65€ possible extra cost at the boarding gate is exacerbated once again.

HAND LUGGAGE WITHOUT PRIORITY BOARDING

One small bag in the cabin is included for each passenger.



Measurements for your small bag


It will go under the seat in front and must measure no more than 40 (height) x 30 (width) x 20 (depth) cm.



Regulations on liquids (100ml)

Remember that liquids in your toiletry bag must travel in bottles containing no more than 100 mL.



 **Remember that you can only bring one small bag with you.**

The cost of bringing a cabin bag into the cabin without priority boarding is €65 per passenger and per flight.

**Add priority boarding from
€9**

f) Vueling

Key figures and data:

- Vueling apply fees depending on demand, the route and selected travel dates, and also depending on whether they are added during the booking process (between € 10 and € 59 per item and flight), through Customer Service (between €10 and € 59 per item and flight)¹³ or subsequently, at the airport (between € 45 and € 75 per item and flight at check-in desk)¹⁴.
- Vueling also implements *dark patterns* by promoting the most expensive option - « Fly Grande » ticket – during the booking process (see Figures 13 and 14). In our assessment, this website default design and interface¹⁵ constitutes a manipulative practice that materially distorts or is likely to distort the economic behavior of an average consumer and breach the trader’s professional diligence requirements (Article 5 UCPD) and amount to a misleading practice (Article 6 UCPD). This is exacerbated visually highlighting with in yellow the most expensive option.
- Number of passengers potentially affected in 2023 only: 36.8 million¹⁶.

Figure 13: Vueling – Booking process highlighting that only a "small under the seat hand baggage" is part of the "Flight Light" ticket on carrier’s website – (40x20x30cm). “Fly Grande” option containing “a piece of luggage in the overhead locker” is brought forward in the presentation (FR Version)

ÉCONOMISEZ AVEC VOTRE TARIF

AJOUTEZ VOS SERVICES SUPPLÉMENTAIRES PRÉFÉRÉS ET VOYAGEZ AU MEILLEUR PRIX !

FLY
Optez pour les bagages que vous souhaitez

- 1 bagage à main sous le siège
Max. 40x20x30 cm
- Choisissez vos bagages
 - ☒ 1 bagage dans le compartiment supérieur
Max. 10 kg et 55 x 40 x 20 cm
 - ☐ Bagage enregistré de 25 kg (+40,00 EUR)
- Choisissez votre place [i](#)

+127,98 EUR/PERSONNE

sur le prix du billet

★ Au moment de la réservation uniquement

FLY GRANDE
Votre voyage plus complet

- 1 bagage à main sous le siège
Max. 40x20x30 cm
- 1 bagage dans le compartiment supérieur
Max. 10 kg et 55 x 40 x 20 cm
- Bagage enregistré de 25 kg
- Choisissez votre place [i](#)
- Changements et annulation [i](#)
- Priorité à l'aéroport [i](#)

+247,98 EUR/PERSONNE

sur le prix du billet

FLY LIGHT
Voyagez avec l'essentiel

- 1 bagage à main sous le siège
Max. 40x20x30 cm

Vous pourrez ajouter des services supplémentaires ultérieurement

SÉLECTIONNER

Prix du billet par personne 315,78EUR

¹³ <https://www.vueling.com/en/vueling-services/supplementary-service-rates> , last consulted on 18 March 2025.

¹⁴ <https://www.vueling.com/en/vueling-services/prepare-your-trip/luggage> , last consulted on 18 March 2025.

¹⁵ As recognized in the 2021 UCPD Guidance: “Default interface settings have a significant impact on the transactional decision of an average consumer. Traders could not only influence consumers to take certain actions, but also take specific actions in their place, for example by using pre-ticked boxes, including to charge for additional services, which is prohibited under Article 22 of the CRD. Such practices can also breach the UCPD as well as data protection and privacy rules” – Section 4.2.7. Data-driven practices and dark patterns.

¹⁶ https://static.vueling.com/corporative7/media/2037/eng_vu23-comprimido.pdf, last consulted on 18 March 2025.

Figure 14: Vueling - Booking process highlighting that only a "small under the seat hand baggage" is part of the "Flight Light" ticket via a mobile phone – (40x20x30cm) – “Fly Grande” option containing “a piece of luggage in the overhead locker” is brought forward in the presentation – (EN Presentation).

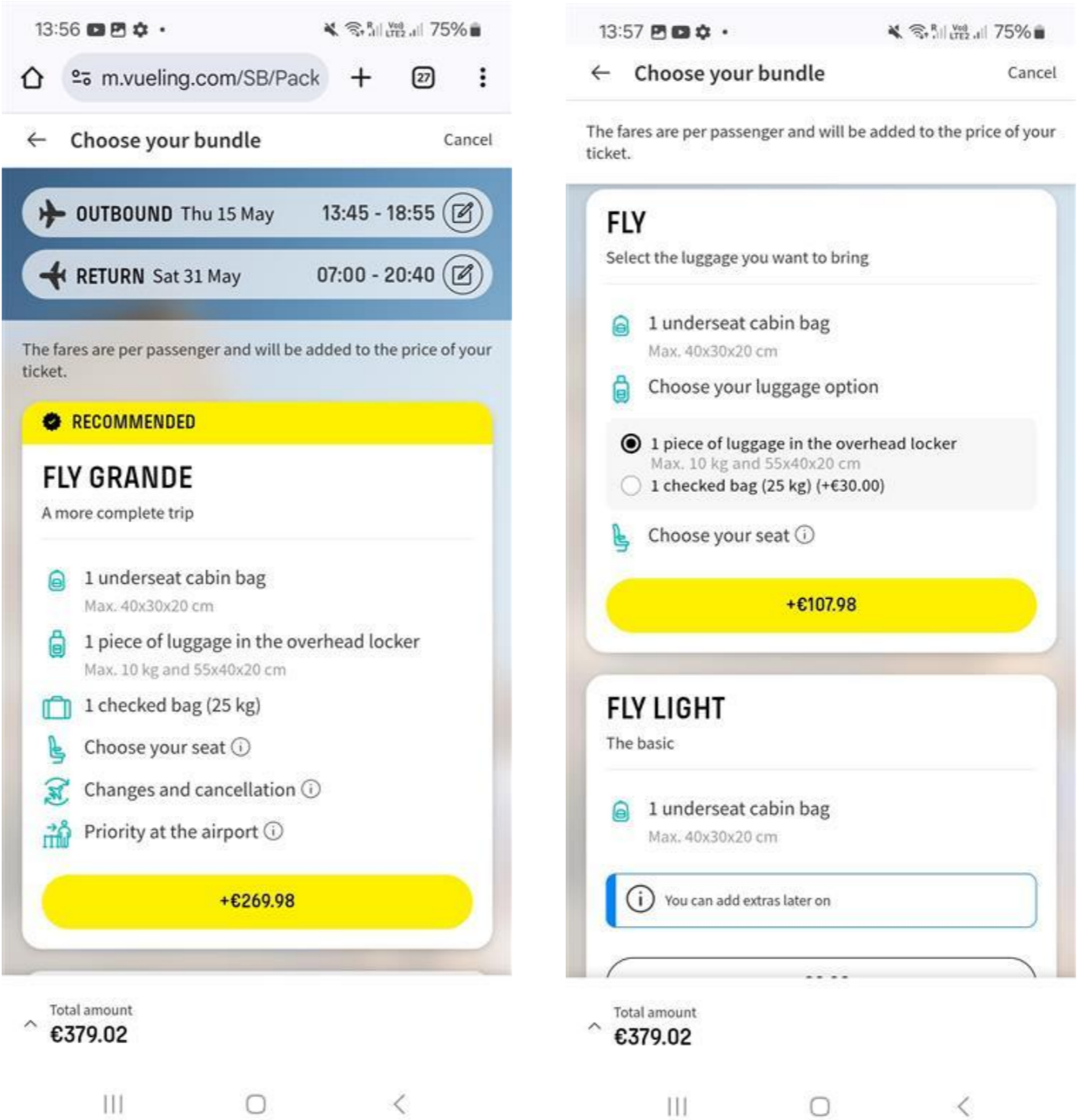


Figure 15: Successive prompts on consumers to buy an extra piece of baggage, some emphasizing the consequences for not doing it (75€ extra costs)

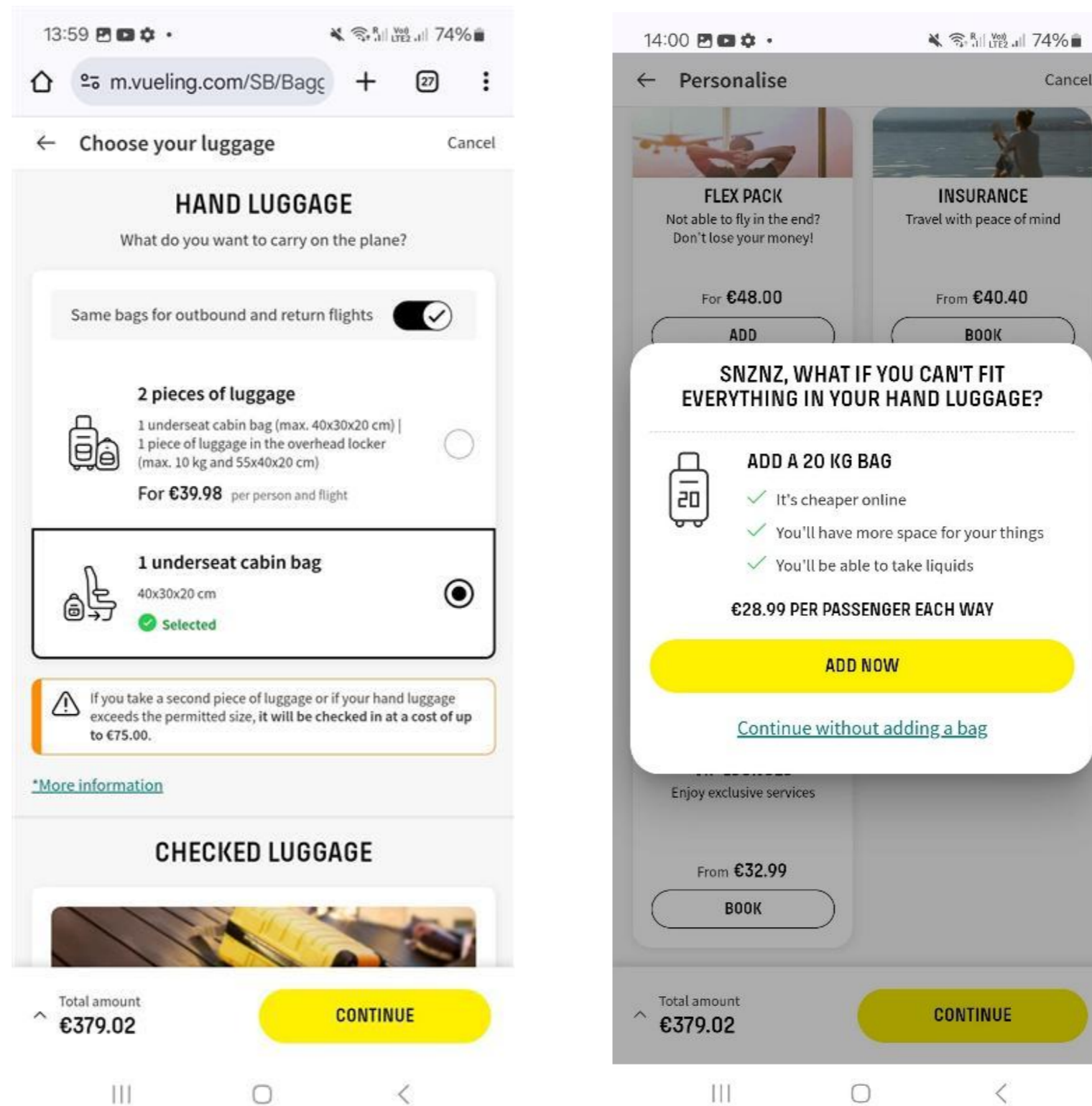







Figure 16: Vueling - Description of “under the seat cabin bag” and “luggage in overhead locker” on carrier’s website

 <https://www.vueling.com/en/vueling-services/prepare-your-trip/luggage> 


S CHECK-IN FLIGHT STATUS **vueling** OFFERS LOYALTY INFO/HELP EN | EUR 



WITH YOU IN THE CABIN



1 FREE UNDERSEAT CABIN BAG SIZE




40x30x20 cm

All Vueling passengers on any flight are allowed a **complimentary underseat cabin bag** with a maximum dimension of 40x30x20 cm, in addition to any items purchased at the airport, provided everything fits beneath the seat in front of them.

✓ Included in all bookings

1 PIECE OF LUGGAGE IN THE OVERHEAD LOCKER



10 kg | 55x40x20 cm

If your bundle includes a cabin bag of max. **10 kg (55x40x20 cm.)**, or you have arranged it separately, you must bring it on board and place it in the **overhead locker**.

It's included for:

- ✓ Customers travelling with **Fly or Fly Grande** bundles
- ✓ All [Premium customers](#)
- ✓ Customers requiring [special assistance at the airport](#) and who have booked this service
- ✓ Customers [travelling with an infant](#) (under 2 years of age)

g) Wizzair

Key figures and data:

- Wizzair applies fees for hand baggage depending on the selected travel dates and on whether they are added during the booking process through the WIZZ Priority passengers’ option, through the WIZZ Call Centre or subsequently, at the airport. According to Wizzair, “prices shown are per flight and averaged over all flights” and can be up to 60€¹⁷. At the airport it would cost €65.00¹⁸.
- Number of passengers potentially affected in 2024 only: 62.8 million¹⁹.

Figure 17: Wizzair - Booking process highlighting that only "a free under the seat carry-on bag" is allowed in the default ticket (top right corner) – (40x30x20cm)

Wizzair

ALL SERVICES & FEES

PLAN

WIZZ & SERVICES

HELP CENTRE

CHECK-IN & BOOKINGS

SIGN IN

14 MAR 2025 - 17 APR 2025

1 PASSENGER

CHANGE

FLIGHTS

€179.99

MAR 14

Vienna – Barcelona El Prat

10:15 - 12:45 (W4 2937)

Basic

1 × Flight ticket

1 × Administration fee

€170.99

€9.00

Choose a return flight

We do not charge you any taxes.

Airport and fuel charges included in the base price

PASSENGERS

SEATS

SERVICES

PAYMENT

TOTAL

€179.99

EUR

Fri, 14 Mar 2025

10:15 UTC+1

2h 30m

UTC+1

12:45

Vienna

Barcelona El Prat

Free carry-on bag

In the cabin placed under the seat

Free online check-in

between 24 and 3 hours before departure

Check-in at the airport costs 40 EUR

Basic price:

Continue for €179.99

per passenger on this flight

QUICK TRAVEL

WIZZ Smart

Free carry-on bag (40cm × 30cm × 20cm)

Free normal seat selection

Excluding row 1 to 4 and extra legroom seats

10 kg trolley bag on board

55cm x 40cm x 23cm

Free online check-in between 30 days and 3 hours before flight departure

Check-in at the airport costs 40 EUR

Priority boarding

Be among the first to board the aircraft

+ €49.93

PACK & SAVE

WIZZ Go

Free carry-on bag (40cm × 30cm × 20cm)

Free normal seat selection

Excluding row 1 to 4 and extra legroom seats

20 kg checked-in bag

Free Airport & online check-in between 30 days and 3 hours before flight departure

+ €57.92

ALL IN & FULL FLEX

WIZZ Plus

Free carry-on bag (40cm × 30cm × 20cm)

Free premium or normal seat selection

Including front row and extra legroom seat

32 kg checked-in bag

Free Airport & online check-in between 30 days and 3 hours before flight departure

10kg trolley bag on board

55cm x 40cm x 23cm

Online flight change without flight change fees

Fare difference fee may be applicable

Refund to WIZZ account

Within 72 hours

+ €81.49

¹⁷ During the testing conducted in the context of this complaint, we have seen a great price variation depending on the route selected by consumers. For a return flight Charleroi-Bruxelles-Sud – Koutaïssi, the Wizz Priority Option was of 21€ per flight (42€ in total). For a Charleroi-Bruxelles-Sud – Budapest the Wizz Priority Option was of 38€ per flight (76€ in total), <https://www.wizzair.com/en-gb/information-and-services/wizz-services/wizz-priority>, last consulted on 18 March 2025.

¹⁸ “Only WIZZ Priority passengers are entitled to bring an extra trolley bag of maximum size 55 x 40 x 23 cm in addition to the free carry on bag (max. 40 x 30 x 20 cm) into the cabin”, <https://www.wizzair.com/en-gb/information-and-services/wizz-services/wizz-priority>, last consulted on 18 March 2025.

¹⁹<https://www.wizzair.com/en-gb/information-and-services/investor-relations/investors/traffic-statistics>, last consulted on 18 March 2025.

17

Figure 18: Wizzair - Booking process highlighting that only "a free under the seat carry-on bag" is allowed in the default ticket – (40x30x20cm)

ALL SERVICES & FEES

PLAN

WIZZ & SERVICES

HELP CENTRE

CHECK-IN & BOOKINGS

SIGN IN

14 MAR 2025 - 17 APR 2025

1 PASSENGER

CHANGE

FLIGHTS

€294.98

MAR 14

Vienna – Barcelona El Prat

10:15 - 12:45 (W4 2937)

Basic

1 × Flight ticket

€170.99

1 × Administration fee

€9.00

APR 17

Barcelona El Prat – Vienna

09:15 - 11:40 (W4 2938)

Basic

1 × Flight ticket

€105.99

1 × Administration fee

€9.00

We do not charge you any taxes.

Airport and fuel charges included in the base price

PASSENGERS

SEATS

SERVICES

PAYMENT

TOTAL

€294.98

EUR

Flights

Passengers & baggage

Seats

Services

Payment

Vienna (VIE) → Barcelona El Prat (BCN)

Fri, 14 Mar 2025

UTC+1

10:15

Vienna

→

2h 30m

→

12:45

Barcelona El Prat

UTC+1

TRAVEL LIGHT

Wizz Basic

€179.99

Free carry-on bag
(40cm × 30cm × 20cm)
In the cabin placed under the seat

Free online check-in **between 24 and 3 hours before departure**
Check-in at the airport costs 40 EUR

WIZZ SMART

UPGRADE
for +€49.93

CHANGE FLIGHT

Barcelona El Prat (BCN) → Vienna (VIE)

Thu, 17 Apr 2025

UTC+2

09:15

Barcelona El Prat

→

2h 25m

→

11:40

Vienna

UTC+2

TRAVEL LIGHT

Wizz Basic

€114.99

Free carry-on bag
(40cm × 30cm × 20cm)
In the cabin placed under the seat

Free online check-in **between 24 and 3 hours before departure**
Check-in at the airport costs 40 EUR

WIZZ SMART

UPGRADE
for +€38.15

CHANGE FLIGHT

All prices are per passenger and include all applicable taxes. WIZZ does not charge Air Passenger Duty ("APD") taxes for any passenger departing from the United Kingdom. Schedule times shown are the local times of the

Figure 19: Examples of what constitute a "carry-on bag" of 40x30x20cm.

BAGGAGE ALLOWANCE AND SIZE



Did you know? If your carry-on bag will exceed the size limit, **extra fee** will have to be paid at the gate, before boarding.

Carry-on bag examples



Backpack



Handbag



Laptop bag



One carry-on bag, which should be placed under the seat. **Maximum size: 40 x 30 x 20 cm, 10kg** This size is recommended for some personal and small items, e.g. a laptop, documents, a limited amount of clothes.

Pictures are for illustration purpose only

