



Department for  
Business, Energy  
& Industrial Strategy

# THE PACKAGE TRAVEL AND LINKED TRAVEL ARRANGEMENTS REGULATIONS 2018

Review July 2018 – March 2019

**July 2019**



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## Executive Summary

### Background

1. The Package Travel and Linked Travel Arrangements Regulations 2018 ('PTR 2018') came into force on 1 July 2018 and implement the EU 2015 Package Travel Directive<sup>1</sup> ('the Directive'). PTR 2018 introduced a broader definition of a package and the new concept of Linked Travel Arrangements. The effect of PTR 2018 is to increase the number of packages that have insolvency protection in place so that consumers are refunded and, where appropriate, repatriated if the organiser becomes insolvent.
2. In the lead up to implementation of PTR 2018 we held a consultation and workshops with business and consumer groups, at which they highlighted some concerns over the complexity of the new regulations. We responded by engaging with the travel industry to develop guidance to support businesses in complying with PTR 2018 and also committed to taking stock of them after 6 and 12 months of its implementation.
3. In order to carry out the 6-month review, we engaged with key industry bodies, businesses, consumer groups and enforcement authorities and sought responses to a questionnaire which focused on key immediate issues faced by businesses and consumers when adjusting to the new requirements in PTR 2018. The review closed on 8 March 2019.

### Key Findings

4. Overall, the review finds that stakeholders have a number of concerns with PTR 2018, many of which are similar to those raised during implementation. The key issues are as follows:
  - a. **Linked Travel Arrangements** 61% of respondents found interpreting the new concept of Linked Travel Arrangements (LTAs) either somewhat or very difficult. The concept of a LTA is not well understood, with some respondents suggesting that they should be removed from PTR 2018 entirely. In addition, 68% of respondents said that they do not facilitate LTAs.
  - b. **Packages** 50% of respondents found interpreting the new definition of a package either somewhat or very easy. Written responses suggested that the concept of a package was well understood but that the new definition is considered too wide in scope. Generally, the definition of a package was less of a concern to respondents than LTAs.

- c. **Mutual Recognition** 29% of respondents suggested that mutual recognition of insolvency regimes across all EEA Member States had either a minor or moderate impact on their organisation. Most respondents that reported an impact emphasised the benefits of mutual recognition and were concerned about what would happen in a no deal scenario.
- d. **Information Requirements** 79% of respondents either somewhat or strongly agreed that the new information requirements are burdensome for businesses. Many suggested that changing systems and training staff was time intensive, and several indicated that the benefit to consumers of additional information was negligible.

### Next Steps

- 5. We recognise that the industry continues to have reservations about certain aspects of the PTR 2018. The Government has limited scope or opportunity to change PTR 2018 as the Directive harmonises the rules relating to package travel across the EU. However, where appropriate, we will make changes to clarify our Guidance for Businesses. We are prepared to work with the industry and other interested parties on this.
- 6. We acknowledge that some respondents have requested a review of PTR 2018 after the UK has left the EU. We believe this would offer better insight into the operation of PTR 2018 than would be gained from carrying out another review in just a few months' time, as was originally planned. Due to this we have decided to postpone the 12-month review until a time when the UK's position in a post-EU exit landscape is clear. Of course, we are happy to receive feedback on any new issues that may arise in the interim.

## Questions and Responses

### Introduction

7. Following implementation of the PTR 2018 we agreed to consult on the regulation at 6- and 12-months post implementation. For the 6-month review, we sent a questionnaire to key stakeholders in the travel industry. The questionnaire comprised 25 questions relating to the implementation of PTR 2018, including 5 questions that were only relevant to enforcement bodies. These questions elicited a mixture of qualitative and quantitative responses. Qualitative responses have been condensed into summaries which aim to give a snapshot of the broad range of responses received. Quantitative responses are presented by percentage and have been rounded to whole numbers. In total we received 29 responses<sup>2</sup>. A full list of respondents is available in Annex A.

### Definition of a Package Holiday

**Question 1.1** Please select the response which best describes how easy or difficult you have found interpreting the new definitions of a package.

8. In total 24 responses were received (5 from Industry Groups, 1 from an Enforcement Body and 18 from Businesses). The results presented below show that 50% of respondents found it somewhat or very easy to interpret the new definitions of a package:

Very easy	17%
Somewhat easy	33%
Neither easy nor difficult	13%
Somewhat difficult	25%
Very difficult	13%

**Question 1.2** If you have any further comments on the definition of a package, please enter them below. *Summary of responses:*

9. Overall the new definition of a package was fairly well understood. However, several respondents found the definition to be too complicated which, they suggested, makes it difficult for businesses to understand their obligations and for consumers to understand their rights. In particular, respondents highlighted confusion about package category 6 in the Guidance for Business (packages sold through linked online booking processes) which seems similar to a linked travel arrangement (LTA). As a result, it was suggested by a few respondents that LTAs should be removed entirely.

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<sup>2</sup> In addition, 'Which?' provided a response in an alternative format. Their views are included as part of the qualitative responses only.

10. Many respondents felt that the definition of a package is too wide and some expressed concern that multiple services provided on the same premises by the same operator (e.g. a hotel also offering services such as a spa) fall within the scope of PTR 2018.
11. One respondent indicated that there is confusion in the travel industry regarding what is meant by a 'tourist service', which can be one component that makes up a package. It was also suggested that it is unclear whether a package holiday could, in itself, be considered as another 'tourist service' when selling additional services alongside an existing package. It was queried as to whether a new package would be created if a trader sells an additional tourist service (i.e. transport to an airport) with a pre-existing package.
12. One respondent raised concern about businesses which now offer multiple tourism services on their platforms in a similar way, the respondent claims, to 'online travel agencies' (OTAs). It was suggested that while OTAs recognised that many of their arrangements are in scope of PTR 2018, sharing economy platforms<sup>3</sup> do not. The respondent would like to see the Guidance altered to clarify that products and services purchased on sharing economy platforms are considered to be subject to PTR 2018.
13. Concern was raised regarding the indication in recital (18) of the Directive that a package may be created if "any other tourist service" forms 25% or more of the total value of the relevant combination of travel services. It was suggested that the percentage threshold is confusing and impractical as the trader (and the customer themselves) might not always know how much the other service will cost, for example if the other tourism service is a restaurant booking. Respondents indicated that this is particularly problematic for small businesses providing packages that do not include transport.
14. Several respondents commented on Article 3(2)(b)(v) of the Directive, which covers linked online booking processes<sup>4</sup>. They noted that protection is only offered to consumers making linked online booking if their personal details (such as name, or payment card details) are transferred from one trader to another. The feasibility and legality of transferring these details, particularly given the General Data Protection Regulation (GDPR), were also questioned. It was felt that Article 3(2)(b)(v) should be reconsidered by the European Union so that only date of travel or destination needs to be transferred.

## Government response

15. We have taken note of respondents' comments about the definitions of a package. However, as the Directive harmonises EU rules, we cannot substantively depart

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<sup>3</sup> Sharing economy platforms enable the exchanged access of goods and services between two or more parties facilitated by online platforms.

<sup>4</sup> Linked online booking processes are where the traveller's name, payment details and e-mail address are transmitted from the trader with whom the first contract is concluded to another trader or traders.

from the agreed EU definition. Regarding businesses which now offer multiple tourism services on their platforms in a similar way to OTAs, they will be in scope of PTR 2018 if their activities fall within the definitions contained within PTR 2018. This will depend on the specific circumstances of each case and will ultimately be a matter for the courts to decide. Trading Standards and the CAA will continue to engage constructively with key industry stakeholders on enforcement matters.

16. We understand the concerns that PTR 2018 may impose unnecessary burdens on the UK's domestic tourism industry. The purpose of PTR 2018 is to ensure additional protection for consumers buying combinations of travel arrangements for the same trip, regardless of the monetary value of the trip, what travel services make up these arrangements or where the trip takes place.
17. In response to the comments on linked online booking sales, Article 26 of the Directive commits the European Commission to provide a report regarding the definition in Article 3(2)(b)(v), and specifically whether an adjustment or broadening of the definition is appropriate. The report was adopted on 24 June 2019 and is available online<sup>5</sup>. The Commission will carry out further assessment before drawing conclusions regarding a possible adjustment of the definition provided in the Directive. A general report on the application of the Directive will follow in 2021.
18. With regards to comments about the transfer of personal information between traders we would like to note that any such activity must adhere to the requirements of the General Data Protection Regulation (GDPR). It is important to note that the GDPR does not stop personal data from being shared; instead it sets out the rules for how data may be shared in line with the data protection principles. More information on obligations under the GDPR is available on the ICO's (Information Commissioner's Office) website.

## Linked Travel Arrangements (LTAs)

### Question 2.1 Do you currently facilitate LTAs?

19. In total 25 responses were received (6 from Industry Groups, 1 from an Enforcement Body and 18 from Businesses). As shown below most respondents (68%) are not currently facilitating LTAs.

Yes	32%
No	68%

**Question 2.1a** If you answered yes to the question above, approximately what percentage do they constitute of your overall sales? *Summary of responses:*

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<sup>5</sup> Report available at: [https://ec.europa.eu/info/law/law-topic/consumers/travel-and-timeshare-law/package-travel-directive\\_en](https://ec.europa.eu/info/law/law-topic/consumers/travel-and-timeshare-law/package-travel-directive_en)



20. Respondents facilitating LTAs reported that sales from LTAs constitute a small portion of their sales. Almost all respondents estimated that less than 10% of their sales are classified as LTAs. One respondent reported that 15%-20% are LTAs.

**Question 2.2** Please select the response which best describes your overall experience of interpreting the concept of LTAs.

21. In total 23 Responses were received (6 from Industry Groups, 1 from an Enforcement Body and 16 from Businesses). The results show that 61% of respondents found it somewhat or very difficult to interpret the concept on LTAs:

Very easy	0%
Somewhat easy	13%
Neither easy nor difficult	26%
Somewhat difficult	13%
Very difficult	48%

**Question 2.3** If you have any further comments on LTAs, please enter them below. *Summary of responses:*

22. The majority of respondents suggested that businesses do not understand LTAs because they are too complicated. As a result, businesses are generally more inclined to sell packages, and some have altered their business practices to avoid providing LTAs. Some respondents advocated for removing LTAs from PTR 2018 entirely.

23. A few respondents raised concerns that LTAs provide less protection to consumers than packages. They noted that many consumers find LTAs confusing, and often mistakenly believe that they have purchased a package. A recent investigation by the consumers' association Which? found that many of the largest package and LTA providers do not understand PTR 2018. Which? comment that although PTR 2018 is difficult to understand, 'that is no excuse for travel agents offering a sub-par service to consumers.'

24. Respondents noted that the rural tourism industry is dominated by small businesses working together to provide different tourism services to attract customers. However, in some cases, it was suggested that businesses hesitate to work together because they are not sure whether an LTA is being formed which has had a negative effect on the rural tourism industry. It was suggested that further guidance is needed regarding what 'targeted manner' means in the context of LTAs. Respondents proposed that an LTA should only be formed where there is a commercial relationship between businesses.

25. It was also reported by a few respondents that there did not seem to be appropriate insolvency protection products on the market for small businesses

and some people were disappointed that the CAA does not offer protection for LTA as they do for packages via the ATOL scheme.

26. It was suggested that booking patterns are changing, leading to a rise in last-minute reservations. When customers book last-minute, respondents commented that the chance of an LTA being created is much higher. This is because consumers are more likely to book extra activities within a 24-hour period if their holiday is just days away. This brings many sales into the scope of PTR 2018 as LTAs. It was commented that this is damaging to small businesses and contradicts government policies designed to promote the collaboration of local businesses.
27. One respondent has raised concern that the definition of a 'package' and 'linked travel arrangement' could create loopholes in certain situations.

### Government Response

28. We note the comments that some businesses and consumers have found it difficult to understand the concept of a Linked Travel Arrangement and there were also concerns that last-minute bookings could lead to more sales falling into scope. We acknowledge the request to remove the concept of LTAs from PTR 2018 but this is not currently possible because the UK is legally obliged to fully implement the EU Directive, including LTAs.
29. Citizens Advice have issued guidance in order to help consumers understand their rights when purchasing package holidays and linked travel arrangements. We will continue to work closely with Citizens Advice and businesses to ensure that guidance is as informative and helpful as possible.
30. We understand how important the collaboration of small businesses is for the tourism industry, particularly in rural areas, and acknowledge the difficulty some are having with understanding what is meant by 'targeted manner'. We have already offered an explanation of the concept in paragraph 72 of the Guidance for Businesses. In paragraph 73 we have indicated that arrangements in scope of LTAs will often be based on a commercial link involving remuneration between multiple traders. We will work with stakeholders to provide further clarity where possible, but the Guidance cannot be changed as it will alter the meaning of PTR 2018 or be used as a gateway to include concepts in PTR 2018 that are not currently present.
31. We recognise that there are still concerns regarding the definition of a package and linked travel arrangements which had initially been flagged during implementation. We have replicated text from the Directive on the new definitions from the Directive in order to ensure the Directive is fully implemented and to avoid creating ambiguity in that regard. Hence our intensive engagement with stakeholders to develop guidance to support the PTR 2018 and provide clarity for industry-

## Changes to Information Requirements

**Question 3.1** I feel the new information we are required to provide is useful for consumers.

32. In total 25 responses were received (6 from Industry Groups, 1 from an Enforcement Body and 18 from Businesses). The results below show that most respondents (56%) either somewhat or strongly disagree that the new information they are required to provide for consumers is useful:

Strongly agree	4%
Somewhat agree	28%
Neither agree nor disagree	12%
Somewhat disagree	36%
Strongly disagree	20%

**Question 3.2** I feel the new information we are required to provide is burdensome for businesses.

33. In total 23 responses were received (6 from Industry Groups, 0 from Enforcement Bodies and 17 from Businesses). As shown below a majority of respondents (79%) felt that they either somewhat or strongly agreed that new information requirements were burdensome for business:

Strongly agree	57%
Somewhat agree	22%
Neither agree nor disagree	17%
Somewhat disagree	4%
Strongly disagree	0%

**Question 3.3** If you have any further comments on the new information requirements, please enter them below. *Summary of responses:*

34. Several respondents suggested that the information requirements are confusing for consumers, who are not aware of them, rarely read them and do not understand them. It was also noted that the benefit of providing the information to consumers is negligible because their rights and protections under PTR 2018 are not affected if the information is not provided.

35. A few respondents suggested that the information is beneficial for consumers purchasing traditional packages, but less useful where the consumer is purchasing value-added products which combine accommodation with 'other tourism services' or where services are being provided on the same premises by the same operator.

36. Many respondents suggested that the new information requirements are an unnecessary administrative burden for businesses. It was suggested that making

changes such as updating IT systems, training staff and altering terms and conditions was resource and time intensive and businesses were not given enough time to prepare in order to comply by 1 July 2018.

37. There was also concern that information requirements would be ignored by non-compliant businesses while responsible and compliant operators end up with more bureaucracy.
38. Some commented that providing flight information for bookings made over a year in advance is difficult as flight schedules do not exist that far in advance. Respondents proposed that flight information should only be given when flight times are confirmed by the carrier. Respondents also noted that the amount of information that needs to be read out to the customer is impractical in a call centre environment.
39. It was suggested that further guidance on the meaning of 'generally suitable' in Schedule 1(10) of PTR 2018 would be helpful when advising people with reduced mobility.

## Government Response

40. Whilst noting the concerns raised by businesses that the information requirements could pose an administrative burden, we would like to emphasise that information requirements were introduced to enhance consumer protection and ensure that consumers are appropriately informed when buying combined travel arrangements.
41. We acknowledge that many businesses are concerned that non-compliant businesses will fail to meet their obligations under PTR 2018. We continue to work closely with businesses and enforcement authorities to support businesses to comply with PTR 2018.
42. We recognise that for packages booked significantly in advance it might not be possible, at the time of booking, to give specific flight times. In these cases, travellers must be given an approximate time and should be provided with the actual scheduled time as soon as this is possible.
43. We are unable to offer a precise definition of the phrase 'generally suitable' in paragraph 1 of Schedule 10 of PTR 2018 as it was not clearly defined in the Directive. This is because what is meant by 'generally suitable' is circumstance specific, taking into account individual needs.

## Mutual Recognition of Insolvency Regimes

**Question 4.1** Has the recognition of compliant insolvency cover across all EEA Member States had any impact on your organisation?

44. In total 24 responses were received (5 from Industry Groups, 1 from an Enforcement Body and 18 from Businesses). The results below show that a majority of respondents (71%) think that the recognition of compliant insolvency cover across all EEA Member States has had no impact on their organisation with 29% considering it to have a minor or moderate impact:

Major Impact	0%
Moderate Impact	21%
Minor Impact	8%
No impact	71%

**Question 4.1a** If you answered minor, moderate or major impact to the question above, please describe what impact this has had on your organisation? *Summary of responses:*

45. Most respondents reported that altering their insolvency arrangements to fall in line with the requirements of PTR 2018 was time consuming. Whilst a few respondents reported that some small businesses do not understand mutual recognition, one noted that it had significantly simplified their financial arrangements for packages within Europe.
46. A few respondents expressed concern with regards to the status of mutual recognition after the UK exits the EU, especially in a no deal scenario. Respondents emphasised the benefits to businesses and consumers of reaching an agreement with the EU to ensure a continuation of mutual recognition of insolvency regimes and asked the Government to provide advice for the sector on the issue.

**Question 4.2** If you have any further comments on the mutual recognition of insolvency regimes please enter them below. *Summary of responses:*

47. Respondents generally had a positive view of mutual recognition and reasserted the desire that it stays in place after the UK exits the EU. Particular concern was raised about cross-border sales between the Republic of Ireland and Northern Ireland.
48. Some respondents reported teething problems, particularly regarding the recognition of the ATOL scheme in other Member States. Many respondents also believe that it should be easier to check whether non-UK entities are providing protection.
49. A few respondents questioned the robustness of the system and suggested that it will only be tested when there is a collapse.

### Government Response

50. Businesses experiencing difficulties with recognition of ATOL protection in other member states should contact the Civil Aviation Authority (CAA) for advice. The

CAA is the lead central contact point for the UK, responsible for cooperating with contact points across Europe in the supervision of organisers operating in different Member States.

51. The mutual recognition of insolvency protection is EU-wide and leaving the EU with a deal remains the Government's top priority. However, in the event of a no deal EU exit, mutual recognition will cease with the consequence that other Member States are unlikely to recognise the UK's insolvency protection regime. Therefore, travel providers will have to comply with multiple insolvency regimes across the EU and will have to make themselves familiar with the regime of the country they are selling into.
52. The Government has issued guidance on the impact of a no deal EU exit on consumer rights including on package travel, which is available on [gov.uk](http://gov.uk).

## Central Contact Point

**Question 5.1** Have you used this service either in the UK or an EU Member State in the last 6 months?

53. In total 24 responses were received (5 from Industry Groups, 1 from an Enforcement Body and 18 from Businesses). As shown below most respondents (83%) have not used the Central Contact Point Service in the last 6 months:

Yes	17%
No	83%

**Question 5.1a** If you answered yes to question 5.1, please select the response which best describes your experience with using this service.

54. A few respondents reported that they had used the Central Contact Point to enquire about information regarding other Member States. One respondent claimed that they made a test enquiry to the Central Contact Point but did not receive a response.

**Question 5.1b** If you answered yes to question 5.1, please select the response which best describes your experience with using this service.

55. In total 4 responses were received (1 from Industry Groups, 1 from an Enforcement Body and 2 from Businesses). The results below show that the majority (75%) of respondents had neither a positive nor negative view on the service:

Very Positive	0%
Somewhat Positive	0%
Neither positive nor negative	75%

Somewhat negative	0%
Very negative	25%

**Question 5.2** If you have any further comments on the Central Contact Point service, please enter them below. *Summary of responses:*

56. Respondents questioned how many other EU member states have assigned a central contact point. It was reported that the efficiency of the UK's central contact point was hampered by other Member States that have failed to implement this part of the Directive. Others noted that they knew of very few businesses that have made use of the UK's central contact point.
57. A number of respondents suggested that an online registration scheme should be introduced as part of the central contact point role. It was noted that this could help consumers to make informed decisions when purchasing packages and could reduce strain on Trading Standards.

### Government Response

58. In order to support the mutual recognition principle on insolvency arrangements, EEA states must designate central contact points. These facilitate the administrative cooperation and supervision of organisers operating in different Member States. The UK's central contact point, the CAA has liaised with contact points in some Member States on a few occasions. We continue to work closely with the CAA and will keep the suggestion of an online solution under review.

### General Implementation of PTR 2018

**Question 6.1** Please select the response which best describes your overall view of the implementation of the Package Travel Regulations 2018.

59. In total 25 responses were received (6 from Industry Groups, 1 from an Enforcement Body and 18 from Businesses). The results below show that most respondents (56%) had either a somewhat or very negative view on the implementation of the Package Travel Regulations 2018:

Very Positive	0%
Somewhat Positive	16%
Neither positive nor negative	28%
Somewhat negative	32%
Very negative	24%

**Question 6.2** How easy or difficult have you found making the necessary modifications to your business (e.g. IT changes, T&C updates etc.) to implement the changes required by PTR 2018?

60. In total 25 responses were received (6 from Industry Groups, 1 from an Enforcement Body and 18 from Businesses). As shown below most respondents (62%) found it somewhat or very difficult to make the necessary modifications to their business:

Very easy	0%
Somewhat easy	9%
Neither easy nor difficult	29%
Somewhat difficult	33%
Very difficult	29%

**Question 6.3** If you have any further comments on the implementation of the Package Travel Regulations 2018, please enter them below. *Summary of responses:*

61. Many respondents commented that the changes required by PTR 2018 were relatively straightforward but time consuming which was problematic as the timeframe given to make changes was too short. Respondents suggested engagement with BEIS prior to implementation was constructive.

62. Others suggested that the requirements of the CAA and PTR 2018 are too onerous and overly bureaucratic, especially for small businesses. Some respondents requested that aspects of PTR 2018 be reformed after EU exit and suggested that a detailed post-Brexit review should be carried out.

### Government Response

63. We acknowledge the timeframe given to business to implement changes during implementation was challenging and would like to commend their efforts to comply. The Government has worked with industry to develop Guidance for Businesses, which has clarified a number of issues and enforcement authorities committed to taking a pragmatic approach focussed on supporting businesses to comply. We will continue to work closely with trade associations, businesses and enforcement bodies to assist as far as possible with any compliance issues.

64. Regarding regulatory reforms, it is notable that a post EU-exit review could provide a good opportunity for interested parties to register their views. As the 6-month review has provided an opportunity for further engagement regarding implementation, we believe that for now our focus should be on working with industry to address the issues already raised. As a result, it is sensible to delay the 12 months review of PTR 2018 until a time when the UK's position in a post-EU exit landscape is clear.

### Enforcement of PTR 2018

**Question 7.1** Have you taken any enforcement action in the last 6 months



65. In total 5 responses were received from Enforcement Bodies as shown below 80% of Enforcement Bodies had not taken any enforcement action in the last 6 months:

Yes	20%
No	80%

**Question 7.1b** If you answered yes to question 7.1 please provide examples of the enforcement activity you have carried out

66. Respondents suggested that since implementation, enforcement authorities have been providing advice and direction to businesses, specifically regarding the new definitions, the information requirements and the need to update travellers about any changes to their package holidays. For example, one regional authority reported that they had visited businesses offering Hajj packages to advise them of PTR 2018 and their continuing responsibilities.

67. Respondents highlighted a few issues that have affected their ability to enforce PTR 2018. For example, there is a lack of funding for training enforcement officers to enable them to understand the expanded definitions within PTR 2018. Enforcers also felt that trading standards officers have limited capacity to investigate, interview and prosecute traders in other jurisdictions and particularly those based outside of the EEA.

68. Respondents consider that there is an ineffective division of responsibility between Trading Standards and the CAA in enforcing LTAs. It was suggested that the CAA should be responsible for enforcing the law relating to flight-inclusive LTAs instead of Trading Standards, as the CAA have the experience and records of these types of businesses.

**Question 7.2** What enforcement-related issues have been brought to your attention in the last 6 months? Please provide examples if possible

69. One respondent reported that a number of complaints were raised by consumers, who broadly did not understand their rights under PTR 2018 and suggested that this is because information about the purchase is not sufficiently clear in pre-contractual information.

**Question 7.3** How have the new requirements of the Package Travel Regulations 2018 impacted your organisation? Please provide examples if possible

70. Respondents suggested that the main impacts were on resources because enforcement officers needed to familiarise themselves with the new requirements when offering advice to businesses and consumers. Many respondents reported that they do not have the capacity to look into holiday complaints, with other areas of consumer detriment being a higher priority.

## Government Response

71. We understand the concerns that some respondents raised about limited resources for Trading Standards to enforce PTR 2018. However, we are encouraged to hear that some Trading Standards authorities have been proactively engaging with businesses regarding the new requirements of PTR 2018. We will continue to work with the CAA and Trading Standards in order to support compliance and enforcement.
72. Regarding flight-inclusive LTAs, when PTR 2018 was introduced, it was decided that the CAA would work closely with Trading Standards on enforcement where applicable. Although this decision may be reviewed in the future, we are not presently aware of material consumer detriment.

## Concluding remarks

73. We are grateful to the organisations and individuals who took time to respond to the questionnaire as part of the 6-month review of PTR 2018. The feedback we received was helpful in understanding the impacts of PTR 2018 on businesses and consumers. We will continue to engage with enforcement authorities, businesses and consumer representative bodies to support businesses in complying with PTR 2018 and ensure that consumers continue to be protected.

## Next steps

74. We recognise that the industry continues to have reservations about certain aspects of the PTR 2018. The Government has limited scope or opportunity to change PTR 2018 as the Directive harmonises the rules relating to package travel across the EU. However, where appropriate, we will make changes to clarify our Guidance for Businesses. We are prepared to work with the industry and other interested parties on this.
75. We acknowledge that some respondents have requested a review of PTR 2018 after the UK has left the EU. We believe this would offer better insight into the operation of PTR 2018 than would be gained from carrying out another review in just a few months' time, as was originally planned. Due to this we have decided to postpone the 12-month review until a time when the UK's position in a post-EU exit landscape is clear. Of course, we are happy to receive feedback on any new issues that may arise in the interim.

## **Annex A – List of Respondents**

- ABTA
- AITO
- Alternative Adventure
- BA Holidays
- Can be done Ltd
- Chartered Institute of Trading Standards
- Cossington Park
- Destination Bristol
- DFDS Germany
- GB Tours
- International House (Bristol)
- Nature Trek
- Overland Adventures
- Professional Association of Self-Caterers (PASC) (on behalf of multiple businesses)
- Services for Tourism
- STA Travel
- Sunvil Holidays
- Tank Museum
- Theatre Workout
- Thomas Cook
- Tourism Alliance
- Tribes Travel
- TUI
- Trading Standards (Bedford)
- Trading Standards (Greenwich)
- Trading Standards (Norfolk)
- Trading Standards (North West)
- Unicorn Trails
- Wales Tourism Alliance
- Which?