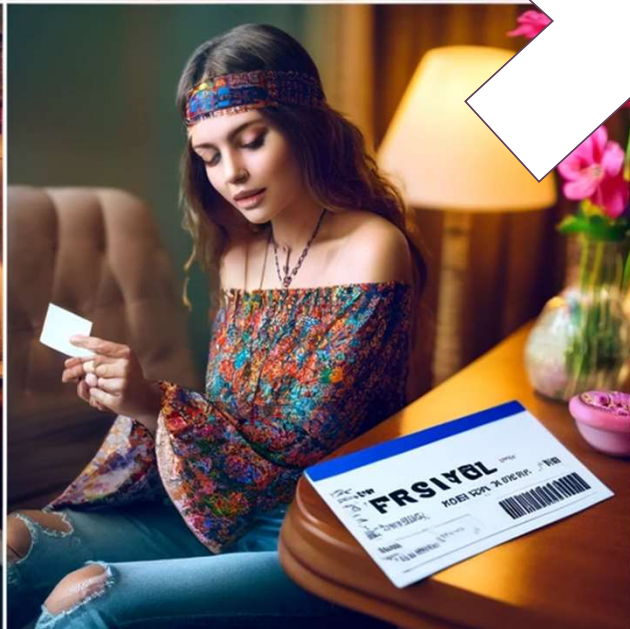


# Current PTD revision proposal

- Step in the wrong direction



# Program

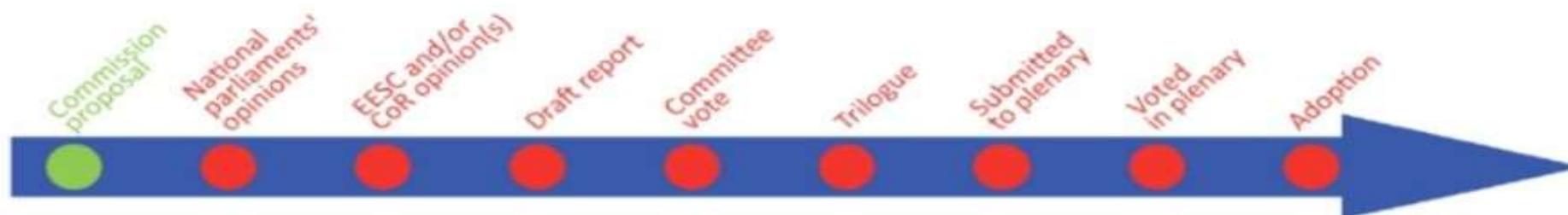
1. Legislative train schedule
2. IFTTA Working Group
3. Feedback
4. What discussion in WG revealed?
5. Action?
6. Discussion
7. Important links





**Proposal for a directive amending Directive(EU) 2015/2302 to make the protection of travellers more effective and to simplify and clarify certain aspects of the Directive**

<i>Committee responsible:</i>	Internal Market and Consumer Protection (IMCO)	COM(2023) 905 29.11.2023
<i>Rapporteur:</i>	Alex Agius Saliba (S&D, Malta)	2023/0435(COD)
<i>Shadow rapporteurs:</i>		Ordinary legislative procedure (COD) (Parliament and Council on equal footing – formerly 'co-decision')
<i>Next steps expected:</i>	Publication of draft report	



---

# Feedback

- 50 individual organizations provided feedback
- 23 of which against
- 13 of which partly in favor, partly against
- 10 of which in favor



# Who said what? – Interest groups

- Against
- Partly against
- In favor

– Aviation industry ●●●●●

Like the IATA or EasyJet Group

– General Business ●●●

Like the Czech Chamber of Commerce Association

– Sports and tourism industry ●●

Like the French equestrian association

– Hospitality sector ●●

Like the Finnish Hospitality Association (MaRa)

– Travel technology ●●●

Like eu travel tech or the Expedia Group

– Holiday homes ●●

Like the German Holiday Home Association

– Travel operators ●●●●●

Like Sunweb or the Nordic Leisure Travel Group

– Mobility (auto club) sector ●●

Like automobile associations or CarTrawler

– Insurance providers ●●●●

European, especially French and German, insurers

– Travel agents and tour operators ●●●●●

Like IFTTA, ABTA, the Lithuanian or Flamish travel associations

– Travel Lawyers ●

IFTTA, Ernst Fuhrich

---

# Positive feedback – key points

- Travellers will benefit from **improved rights**
- **Clearer** rules and **reduced legal uncertainty**
- **Insolvency protection** beneficial to consumers
- Clarification of the **roles of different actors**
- B2B rules on **reimbursement** ensure smooth process for consumers
- Art. 12a: rules for vouchers and refunds provide **transparency** and **quicker** reimbursements
- Art. 17: **minimisation of financial risks** by requiring organisers to have mechanisms for consumer protection in place, **clarity** on organiser's responsibilities

# Negative feedback – key points

- Should not use **COVID-19 pandemic** as baseline for regulating the travel and tourism industry
- Doubts whether measures affecting businesses are **proportionate** to consumer's benefits
- PTD may go against EU goal of competitive and fair **travel market**
- **Broad** definition of packages is unfavourable to consumers, results in less choices and higher price
- **Extension** of definition “**package**” to include purchase of **separate services** with separate payments from a single point in a certain amount of time increases **administrative** burden for organisers
- **Sport** associations and **smaller** enterprises should be excluded from the definition
- **Lack of consistency** between PTD and the Air Passenger Rights Regulation
- According to **airlines companies**, market is already **overregulated**
- **Limitation** of **down payments** for package organisers to 25 % risks weakening different players in the tourism industry, not proportional and not necessary to protect consumers



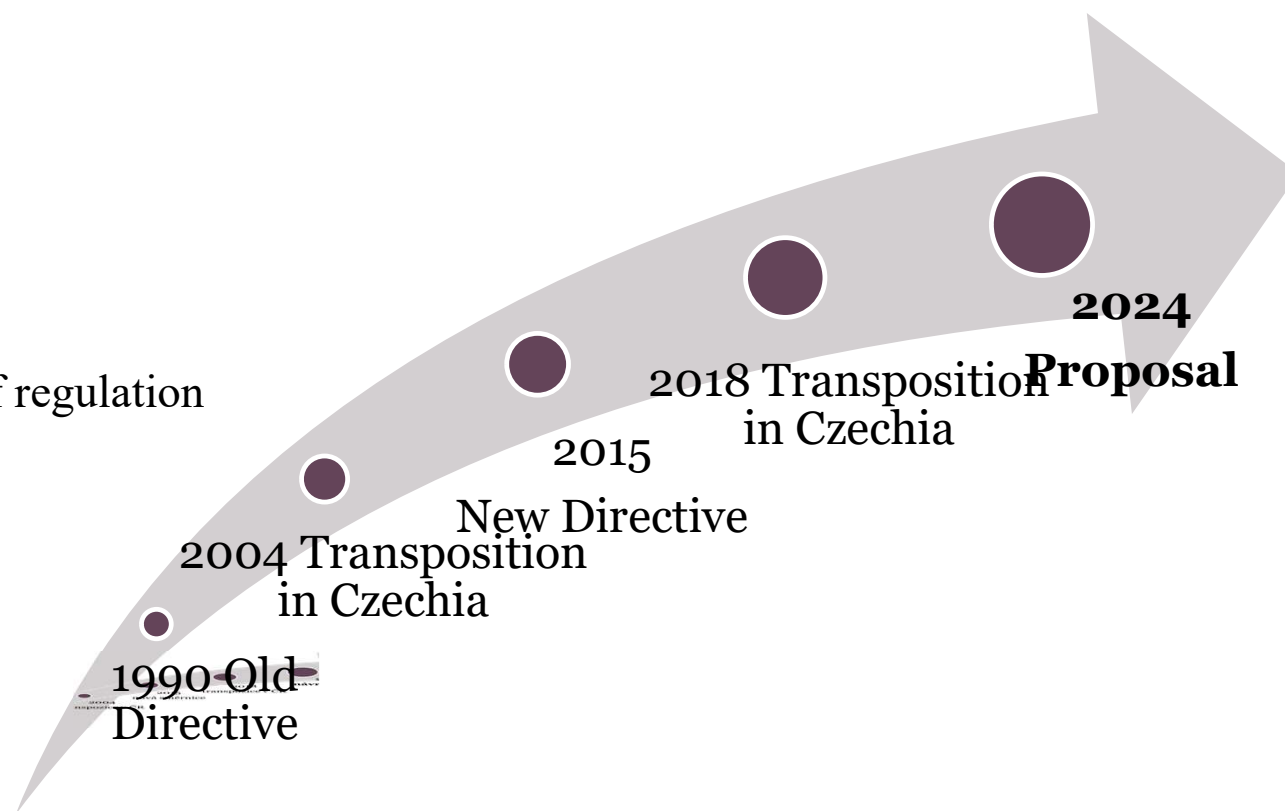
---

# Example of Proposed Changes

- Provide better **balance** of consumers' and travel businesses' interests
- Remove **inconsistencies** between rules on package travel and single transport tickets
- Exclude **vouchers** in **insolvency** protection
- Provide more information on **environmental impact** of travel
- Allow flexibility of requirements in the quality and reporting system (**Annex 5**)
- Consider that **airlines** in package travel **need protection** against possible **insolvency**
- Amend new **definition** of packages services as now it requires user tracking and invites concerns about GDPR
- **Payment in advance** is regulated too strictly
- Regarding consumer's place of residence or departure, liability to **refund** not to be put on organiser (except for natural events when no alternative can be provided)
- Exclude **obligation** to **refund vouchers** after their validity period is over
- Three-month refund period is **unrealistic**

# What WG discussions revealed?

- Moved away from the original goal
- Free travel and protection
- When did it change?
- Exponential technology shift
- Renew the debate on the purpose of regulation



---

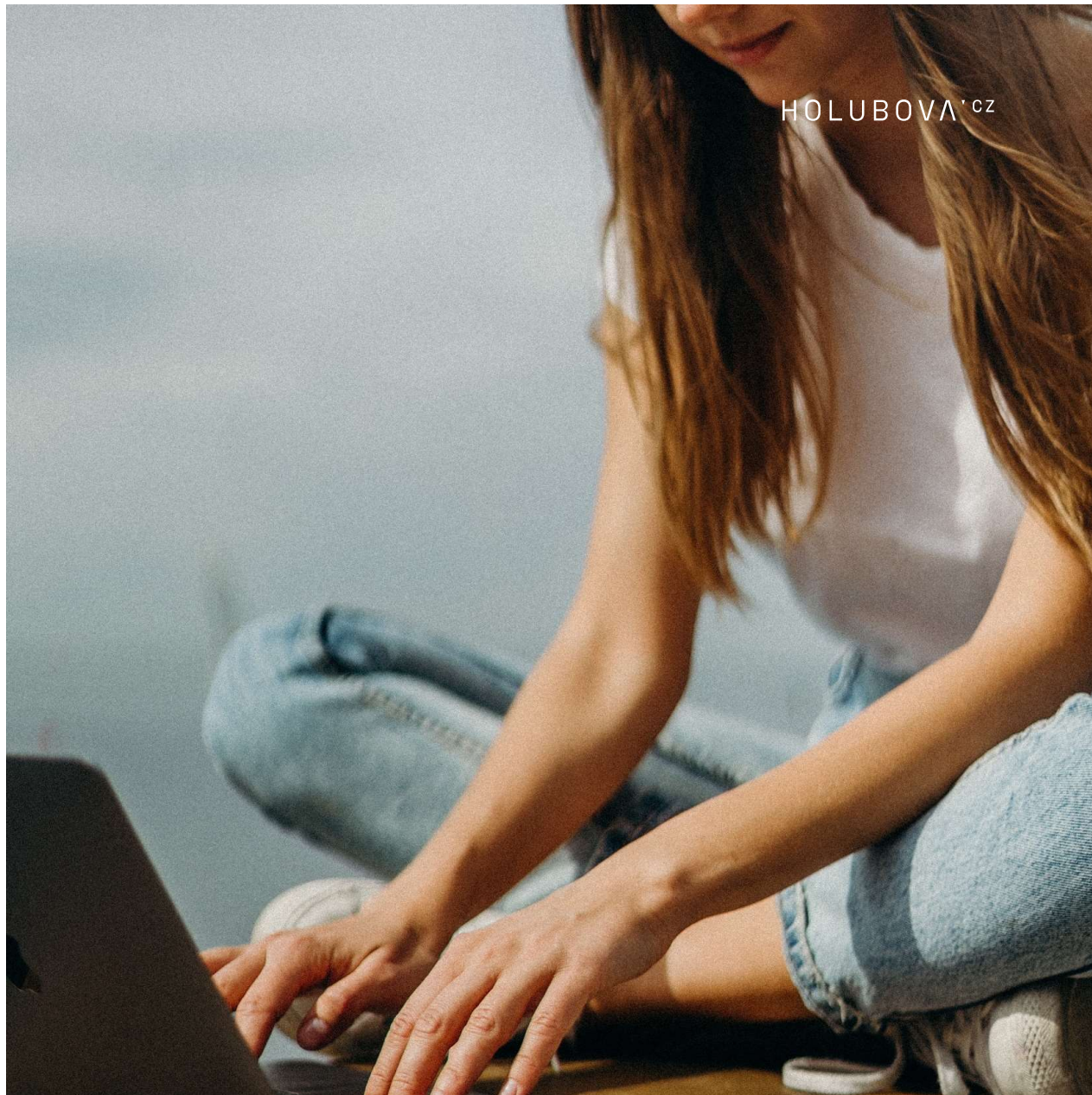
# Action?

HOLUBOVA'02





# Discussion



# Thank you!

Klára Dvořáková  
[klara.dvorakova@holubova.cz](mailto:klara.dvorakova@holubova.cz)