

AIRE's perspective on the revision of the Directive amending Directive (EU) 2015/2302 to make the protection of travellers more effective (Package Travel Directive)

Airlines International Representation in Europe welcomes the European Commission's Proposal for Directive amending Directive (EU) 2015/2302 to make the protection of travellers more effective which was officially unveiled on 29 November 2023. Airlines, as key players in the travel and tourism sector, are directly impacted by the rules set out in the Directive, particularly with regard to liability and the obligations imposed on organisers of packages.

While the Directive offers important protections for consumers, **its current framework may need to be updated to reflect the evolving landscape of the travel industry**, especially considering the increasing integration of services across multiple transport modes and digital platform.

- **AIRE welcomes the updated definition of a package, which now accounts for situations where services are purchased from separate traders through linked online booking processes (art. 3).** Under this definition, a package is recognized when a traveller's personal details are transferred between traders. Additionally, bookings made for different types of travel services for the same trip or holiday, whether within a short period of time at one point of sale or selected prior to the conclusion of the first contract, will be considered as packages. This clarification helps eliminate the current overlap between the definitions of 'package' and 'linked travel arrangement' under the existing regulation.
- **We consider it an advancement that passengers are now offered the option of receiving vouchers instead of a cash refund when a contract is terminated (art. 12 a).** The proposal specifies that organisers may issue vouchers with a validity of 12 months, but passengers must be clearly informed that accepting the voucher is not obligatory. This provision offers flexibility and enhances the passenger's ability to use the value of their refund in the future.
- **AIRE finds it a very positive development that service providers who cancel or fail to provide a service that is part of the package** will be required to refund the organiser the payments received for the relevant service within 7 days (art. 22).

By revising the Package Travel Directive, AIRE believes that the European travel and tourism sector can be made more efficient, competitive, and fair, ensuring that both consumers and service providers, including airlines, are properly protected in an increasingly complex travel environment.