



Civil Aviation Authority
Interim Consumer
Enforcement Strategy

Introduction

The CAA's Strategic Plan 2011-2016¹ recognises that effective competition between airports, airlines and other service providers, with consumers being suitably empowered to engage, is the best way to promote consumers' interests. However, we also recognise that, even in competitive markets, there will sometimes be the need for regulatory intervention to protect consumers' interests and to make markets work well for them. The aviation market is relatively complex with significant product differentiation, considerable choice and a range of suppliers involved in delivering the service to consumers. Faced with such a complex and diverse market, consumers may be exposed to the risk of unfair treatment, in particular where there is a lack of accessible information or where suppliers can take advantage of systematic biases in consumers' behaviour.

In this context, the enforcement of consumer protection legislation² forms an important part of our regulatory toolkit to improve outcomes for consumers.

Our Strategic Plan sets out a number of target outcomes in terms of our enforcement activity:

- Routine compliance with the relevant consumer protection legislation will be the norm, avoiding the need for encouragement and enforcement except in rare circumstances.
- We will achieve the right balance of formal and informal approaches and will use enforcement powers where appropriate.
- Consumer issues will be identified and

resolved in a more structured and consistent manner.

We have already started to implement a number of strategies to deliver against these target outcomes:

- We have carried out an internal reorganisation to give a more coherent approach to our regulatory policies and to place a particular focus on consumer issues. The new group is called the Regulatory Policy Group (RPG) and contains a new team focused on consumer and market issues.
- We have integrated the handling of passenger complaints into RPG, ensuring that this valuable source of market intelligence feeds into the ongoing development of our consumer work.
- We have consulted on and published a set of Prioritisation Principles,³ which describe how we will pick the issues on which we will take action, and which will support our efforts to target resources to where they will make the most difference for consumers.
- We have established a governance process to implement the Prioritisation Principles and to manage the development of our external and internal policies and procedures for assessing consumer issues.

Document purpose

This document explains our current strategy for consumer enforcement, and the framework within which it sits, to ensure compliance with the relevant consumer protection legislation. Whereas the Prioritisation Principles describe

how we will prioritise which issues to investigate, this Interim Consumer Enforcement Strategy describes how we will go about securing compliance, in particular the approach we will take, the tools we will use and how we will interact with industry where there is an (actual or potential) issue of non-compliance.

We have committed to developing and publishing an overall enforcement policy covering all of our regulatory functions, which will include our airspace, safety, competition and consumer enforcement activities. As part of the development of our overall enforcement policy we will be considering how best to engage with stakeholders.

This Interim Consumer Enforcement Strategy is intended to provide transparency to stakeholders about our current approach to consumer enforcement until this overall enforcement policy is finalised, at which time these principles will be incorporated within that policy.

The ATOL Regulations are an important part of our consumer protection role. Currently the Regulations are enforced through criminal sanctions based on our prosecution policy. This document does not cover ATOL enforcement, but that aspect will be incorporated in the overall enforcement policy covering all our functions.

Defining expectations on compliance and enforcement

Over the past decade the Better Regulation agenda has helped define and embed the

principles of good regulation. Implemented in 2006, the Legislative and Regulatory Reform Act⁴ requires regulators to have regard to principles of good regulation, namely that regulatory activity should be carried out in a way that is proportionate, accountable, consistent, transparent and targeted only at cases where action is needed. The duty on enforcers under the Legislative and Regulatory Reform Act to comply with the Regulators' Compliance Code,⁵ applies to some of the CAA's functions. This statutory code of practice which came into force on 6 April 2008 and is aimed at embedding the Hampton principles⁶ (on effective inspection and enforcement) and the Macrory recommendations⁷ (on the principles and characteristics of an appropriate sanctions regime) into regulatory practice.

In defining what industry can expect from us in terms of our enforcement activities, the following section of this document on 'The CAA's approach to enforcement' describes in detail how we will implement the obligations on us in respect of good regulation as described above.

However, as stated in our Strategic Plan, routine compliance with the law is our ultimate goal. In order to achieve this, we expect the following from industry:

- Industry should be aware of its legal obligations and respect them.
- When the law changes, businesses almost always have a reasonable notice period before new obligations come into force, and we expect that they will use this notice period to determine

how to comply. Calculation of a reasonable period to comply begins from the date when a business knows what the law requires – and certainly not from the date when we notify a business that it is non-compliant.⁹

- Consequently, we expect industry to plan for the necessary changes in legal requirements and do not expect the inflexibility of (or cost of making necessary changes to) IT systems to be a valid reason to explain non-compliance.

- We expect industry to develop internal management systems that ensure senior managers are able to both secure (and provide assurance of) compliance with legal responsibilities. We do not regard time for internal escalation as a reason to delay action to ensure compliance. Where requested, we expect businesses to co-operate with us in building confidence that these internal management systems are robust and effective.

- We also aim to drive compliance through empowering consumers by promoting awareness of passenger rights and providing information and advice to allow them to take up their complaint effectively with industry. Where consumers have been unable to resolve their complaint with a business they can refer their complaint to the CAA's Passenger Advice & Complaints Team. We record complaints data and will use this data to inform our compliance and enforcement work, and to identify trends that indicate systematic non-compliance with legal obligations. We may also take steps to resolve a complaint from an individual passenger with the business concerned

where we consider that this is appropriate.¹⁰

The CAA's approach to enforcement

The purpose of enforcement is to protect consumers from unfair practices and from businesses who do not comply with the law. We are committed to taking action where we have identified serious harm to consumers and/or where businesses are disregarding their legal obligations.

As described in more detail below, a range of enforcement sanctions are available to us to secure compliance. These include regulatory sanctions including: providing advice to businesses; publishing industry guidance; developing self- and co-regulation schemes; issuing warning letters; and securing legal undertakings.

For the most serious breaches, we can seek an Enforcement Order from the Court under Part 8 of the Enterprise Act 2002 or could pursue criminal sanctions again through the Courts.

Consistent with our Prioritisation Principles, in choosing where to take action and which sanctions to use to secure compliance, our approach will be risk-based and proportionate and our actions will be prioritised to ensure that resources are used to the greatest effect. We will also consider the impact on businesses to ensure that our actions do not place an unnecessary burden on them. Our preference is for action that changes individual behaviour and has a general impact on the sector, clarifies points



of law and/or has a deterrent effect.

Relationship to the Macrory principles

We will choose our sanctions to be consistent with the principles in the Macrory report, as set out below:

Aim to change the behaviour of the business

When choosing between sanctions we will consider how best to achieve changes in behaviour and a move into compliance, rather than focusing primarily on punishment. Changes in behaviour could include changes to an organisation's policy and processes, or changes of culture within an organisation.

Aim (where our powers allow) to eliminate any financial gain or benefit from non-compliance

We will target practices that result in significant adverse impact upon consumers, which will also tend to be those that lead to the greatest financial gain to those not complying with the law.

Be responsive and consider what is appropriate for the particular offence and particular business which may, or may not, include punishment and a criminal conviction

We will consider the most appropriate sanction to bring a particular business into compliance. Some of the factors we will consider are the size of the business, whether the business is a repeat offender, and the seriousness of a single offence.

Aim to deter future non-compliance

Our aim is to ensure routine compliance and we will consider the most appropriate sanction to deter future non-compliance within the sector. Our approach will generally be to pursue legal action through the Courts only where necessary and after other measures have been exhausted or are not considered appropriate due to the seriousness of the issue. Full details of the legal sanctions available to us are set out in Annexes A and B.

Aim to restore the harm caused by regulatory non-compliance

Wherever possible we will aim to ensure businesses provide redress to consumers who have been unable to access their rights due to non-compliance.

We will consider whether publishing information about a specific business may be an effective sanction for changing the behaviour of a business or eliminating financial gain. We will also consider what the most appropriate method of publication should be to ensure that we achieve a proportionate response, ranging from routinely publishing information on our website to targeted press briefings.

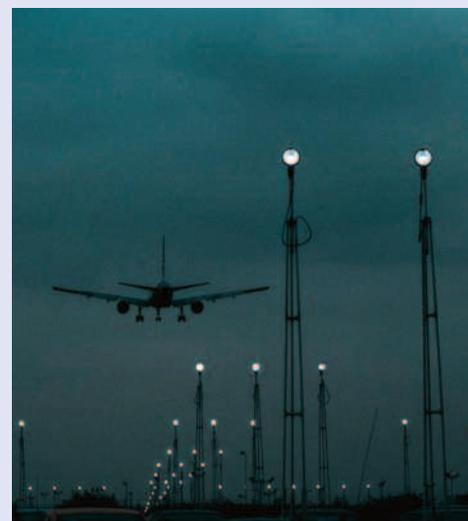
Where a criminal prosecution is considered appropriate, the case will be dealt with by the CAA's Aviation Regulation Enforcement Department (ARE). Our policy on criminal prosecutions is set out on our website¹¹ and is summarised in Annex C of this document.

Enforcement and Better Regulation

We are committed to being an efficient and effective organisation which meets Better Regulation principles and gives value for money. In light of this, the following sub-sections set out our approach to enforcement in more detail, arranged under the Better Regulation principles.

Consistent and Targeted

Where we become aware that a business is not compliant with the law, we will in almost all cases discuss this with the management informally before taking further action. In some cases we might immediately move to enforcement action; this is likely to be in cases where there is significant consumer detriment and we judge that it can be remedied most effectively in this way. We will normally use enforcement as a back-stop,



where informal contacts have not remedied the problem and corrected the underlying issue.

We will employ a consistent approach and will deal with similar issues in a similar way. We cannot deal with all issues and have therefore developed a set of Prioritisation Principles with the aim of ensuring that we use our resources to the best effect. The Prioritisation Principles provide a consistent framework for the way in which we assess issues and make decisions on those that we consider are important and have a serious impact on consumers. Although we will apply a consistent approach, it will be necessary to tailor enforcement action to specific cases and each case will be assessed on its particular circumstances. Whilst we may choose to deal with all similar cases as part of a single process, we may also decide to pursue action against an individual company or small group of companies where this is likely to be a more effective way of resolving the issue and make best use of our available resources.

We have put in place an internal governance process to ensure we take a consistent approach to our enforcement work. We have established the Consumer Issues Panel, which is chaired by the Group Director Regulatory Policy, and which considers issues in the context of the Prioritisation Principles. It makes decisions on whether there has been an infringement, the issues to be pursued, the most appropriate tools to use and also monitors case progress and outcomes. The Panel delegates CAA officials to take action and reports on a regular basis to the

CAA Board and Executive Committee.

The OFT is the lead enforcement authority under Part 8 of the Enterprise Act and has a co-ordinating role to ensure consistency and avoid duplication. We will consult with the OFT on any cases we intend to pursue under Part 8 of the Enterprise Act or the Consumer Protection Cooperation Regulations. We intend to publish a protocol setting out how we will work with the OFT on our common areas of interest.

Proportionate

In determining which sanctions are most appropriate to secure compliance, we will first consider whether we have the power to take action and whether we are best placed to do so. Annex B sets out the key legal provisions which we enforce.

As described in our Prioritisation Principles, to ensure that action is proportionate we will prioritise it to deliver the most consumer benefit whilst minimising the burden on industry in terms of the chosen method of compliance.¹² We will consider four key principles:

Impact – the impact of our intervention on consumers.

Importance – the seriousness of the issue.

Risks – the risks of taking/not taking action.

Resources – the level and cost of resources to take action.

One of the target outcomes of our Strategic Plan is to achieve the right balance of formal and informal approaches. Whilst enforcement through the Courts may be the best response to the most serious breaches of consumer protection legislation, we anticipate that this will be the exception rather than the rule. Wherever possible we will aim to use a range of other enforcement sanctions available to us:

Advice and guidance – we will provide general information and guidance to make it easier for businesses to understand their obligations and to comply with the law. Wherever possible we will involve industry in developing the content and style of guidance and will distinguish between statutory requirements and guidance that is aimed at improvements above minimum standards to identify and encourage best practice.

We encourage businesses to approach us promptly if they have difficulties in ensuring compliance, or their interpretation of the law changes materially. In such circumstances, we will normally provide advice and give the business a reasonable opportunity to comply with the law rather than taking immediate enforcement action.

Self-regulation and co-regulation – we support the use of self-regulation and co-regulation as a good way of driving industry compliance. We will seek to use these tools to consider industry-wide issues and particularly where industry and/or

industry organisations are willing to work in partnership with us.

Requesting information – we may seek specified information from a business or range of businesses to assess compliance and assist in considering whether enforcement action is required.

Inspections – we will not routinely carry out inspections, but would consider them when it is the only way to gain access to information at business premises or to check business practices, such as service provision at airports.

Warning letters – we will use informal warning letters to set out the requirements on a business of a specific piece of legislation and / or explain the steps a business needs to take in order to comply.

Undertakings – we may seek an undertaking from a business to change its behaviour and move into compliance with the law.

Enforcement orders and criminal proceedings – for the most serious breaches, we can seek an Enforcement Order from the Court under Part 8 of the Enterprise Act 2002 or could pursue criminal sanctions again through the Courts.



The diagram below shows the flexibility of our approach to securing compliance and the enforcement sanctions that we have available to us:



Transparent and Accountable

We will aim to be transparent about the reasons why we are taking enforcement action and will provide information to any business being investigated about the process. This will include details of:

- The business activity or practice causing concern.
- The legislation we believe is being breached.
- An invitation to open dialogue.
- An explanation of the next steps, including timescales and the possible consequences of failure to respond.

- The risks we have identified which we believe make enforcement necessary.
- Contact details for the Case Manager and Case Officer.
- Information on any right to appeal following the outcome of enforcement action.

In some cases it will not be appropriate to provide information or discuss the issue with the business, as it may prejudice the investigation.

We will aim to be as transparent as possible about our enforcement work. We will not always publish information about our work, in particular the routine, day-to-day work with businesses on

compliance, but we will normally publish information when we commence an investigation into a particular practice or a particular business. Where we intend to publish information about a named business we will give due notice in advance of any publicity. Publishing information at this stage will allow us to warn consumers about business practices that we consider do not comply with the law. We will also publish information about businesses that do comply with the law and those that deliver best practice. Publication will provide clarity that some parts of industry are performing poorly and will encourage them to take steps to improve performance.

When we have concluded an investigation we will publish the results and details of any compliance or enforcement action taken, including:

- Compliance agreements – including details of signed undertakings.
- Enforcement orders.
- Court action.

In addition to the number of actions taken, we will also aim to measure outcomes to demonstrate the impact of enforcement action. This may include how a business has changed its behaviour following action and moved into compliance providing benefits for consumers. We will also take follow-up action on undertakings or enforcement notices to ensure we can assess whether a business has changed its behaviour.

The CAA is accountable to Parliament, the public and stakeholders through:

- Publishing details of its enforcement strategy,

and the reasons why it has chosen the enforcement actions that it has taken, in its Strategic Plan and Annual Report. This will include details of the outcomes achieved.

- Providing, when requested, written or oral evidence at Parliamentary Select Committees.
- Engaging with stakeholders, including any Consumer Panel set up to represent air passengers,¹³ to seek their views about the proportionality and effectiveness of our regulatory approach;
- To the public through the Judicial Review process.

We will deal with all contacts from stakeholders and consumers in a professional and courteous way.

We operate a complaints procedure that allows stakeholders to provide feedback and comments regarding the activities of our case officers. Complaints and comments should initially be addressed to Chris Hemsley, Director of Consumers & Markets at regulatorypolicy@caa.co.uk. Where appropriate, complaints about the CAA can be escalated to the Group Director Regulatory Policy and on to the CAA's Chief Executive and Chair.

We will consult on our policies, publish them on the internet and review them regularly to ensure they are up-to-date. Reflecting our Strategic Plan commitment to develop a CAA-wide enforcement policy in consultation with stakeholders, this Interim Consumer Enforcement Strategy is not being consulted upon at this stage.

Commercial and personal data that is

provided to us will be protected in line with legal disclosure constraints. There are in place a number of statutory constraints on the disclosure of external information obtained by the CAA; these are contained in:

- Part 9 of the Enterprise Act, which does not allow enforcers to share information obtained from businesses without their consent, apart from some limited exceptions to share information with other designated enforcers;
- Section 23 of the Civil Aviation Act 1982 does not allow the CAA to disclose any information provided to it under the Act without the consent of the person concerned; and
- the general provisions of the Freedom of Information Act 2000.

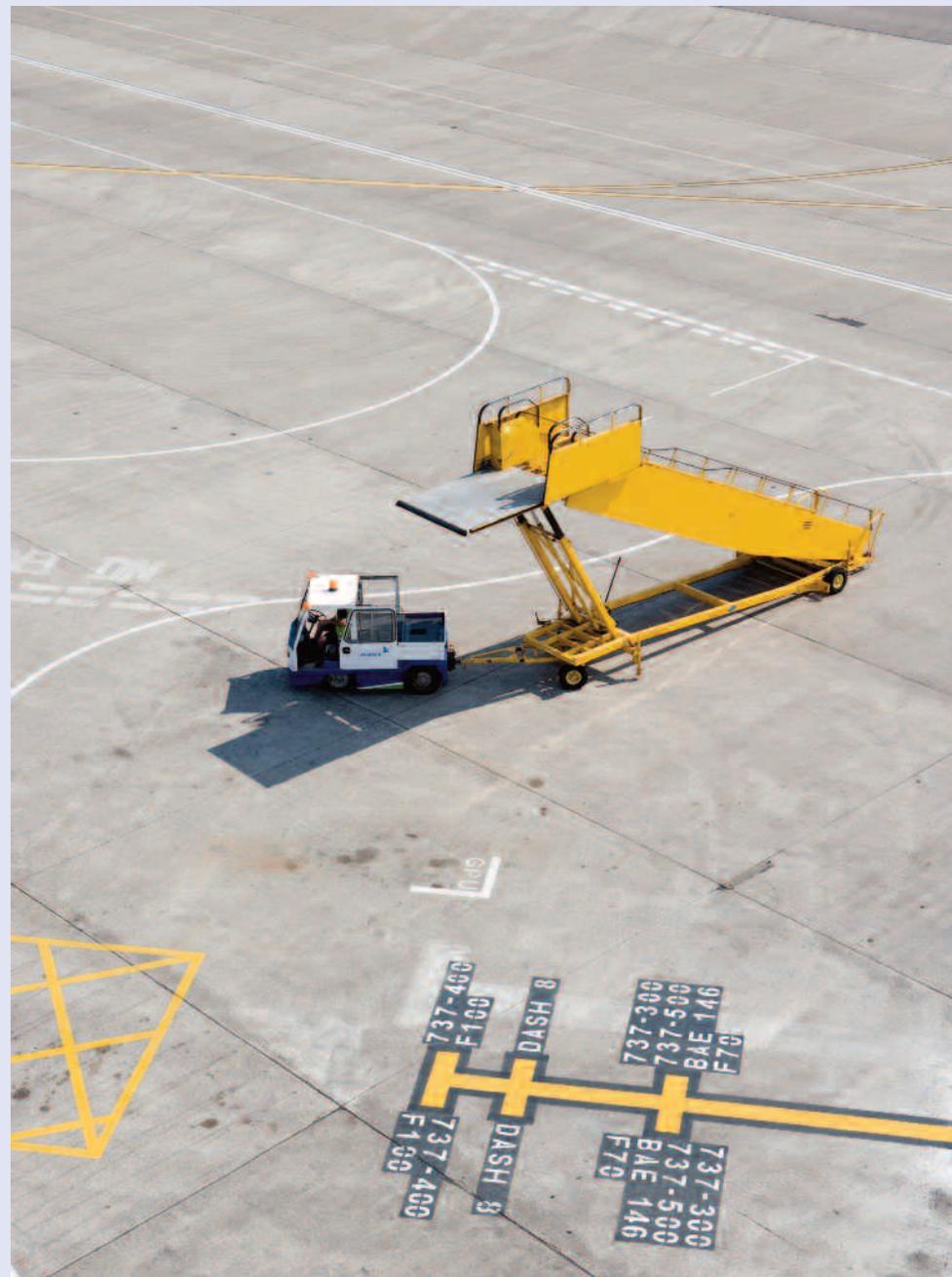
There are circumstances in which we may disclose information if to do so would facilitate the performance of our statutory functions. However, even where we are entitled to disclose for this purpose, we will normally be minded to agree mutually acceptable redactions for sensitive information, and would not normally disclose it, where both of the following conditions apply:

- the information relates to commercial transactions; and
- disclosure of the information would present a significant risk of harm to the legitimate business interests of the person or organisation providing the information.

Parties should be aware that it is possible that some time may elapse between the provision of information and its publication. This may tend to lessen its commercial sensitivity. We will apply

the two criteria above to the circumstances that exist at the time of disclosure. Parties can make representations about any relevant changes of circumstances since the information was originally provided that they think we should consider in making a decision on disclosure.

If we receive a formal request under the Freedom of Information Act for the disclosure of particular information, we have a duty to disclose unless that information falls within a class of information that is exempt from disclosure. Even where an exemption applies it may sometimes be necessary to consider whether it is nonetheless in the public interest to disclose. We have published on our website how we will handle requests for information under the Freedom of Information Act.¹⁴



Annex A: Part 8 of the Enterprise Act

The CAA, along with other UK authorities, is a designated enforcer under Part 8 of the Enterprise Act 2002. This allows us to enforce breaches under a wide range of consumer protection legislation. When investigating a potential infringement we will consult with the OFT to ensure that the best placed authority takes enforcement action. Where we use our powers under the Enterprise Act we will do so in accordance with the OFT Guidance on Part 8 of the Enterprise Act.¹⁵

Part 8 applies to two types of infringements: 'domestic infringements' (breaches of UK legislation) and 'Community infringements' (breaches of European legislation listed in Schedule 13 of the Enterprise Act). It applies only to an infringement which harms the collective interests of consumers, it does not provide for individual redress.

Enforcement Powers

We may make a formal request for information to assist us in considering whether to exercise our powers under Part 8 or to monitor compliance with an order or undertaking we have obtained. This is a statutory power under section 225 of the Enterprise Act. Where we use this power we will issue a notice to the business detailing the information we require and the purpose for the request.

We will generally consult first with a business to seek compliance. This may lead to a resolution

by way of informal assurances as to future conduct. If this approach is not successful we may consider obtaining a formal undertaking from the business or applying to the Courts for an Enforcement Order. The undertaking will relate to the specific aspects of the case and will require that the business does not commence, continue or repeat the conduct which constitutes, or would constitute, an infringement. In some cases, for example, if a resolution is not possible through undertakings, or the matter is urgent, we may apply to the Court for an Enforcement Order without first seeking an undertaking. We are obliged to consult with the OFT before we seek a Court Order of this kind.

We will publish the undertakings we receive from a business, except in exceptional circumstances. We may also apply to the Court for an Enforcement Order if a business fails to comply with an undertaking that has been provided to us.

Where we take proceedings against a business, the Court may accept an undertaking rather than making an Enforcement Order and may require the business to publish the undertaking. Breach of an undertaking imposed and accepted by the Court or an Enforcement Order could result in contempt of Court proceedings.

Before seeking an Enforcement Order we will normally attempt to stop an infringement by consulting with the business and we will also consult the OFT. We will abide by the required time period to consult with businesses:

- Minimum of 14 days – when we seek an Enforcement Order
- Minimum of 7 days – when we seek an Interim Enforcement Order
- In very urgent cases, an immediate application can be made to the Court without consulting the business. This may only be done after approval from the OFT.

Inspection Powers

The Enterprise Act also provides powers of inspection and allows us to enter premises with or without a warrant. These powers were introduced in 2006 when the Enterprise Act was amended to provide inspection powers for domestic breaches. This brought the powers in line with those introduced for cross-border offences under the Consumer Protection Co-operation Regulations.

We will normally give at least two working days' notice of our intention to enter premises without a warrant, unless it has not been possible to serve such a notice, despite all reasonable efforts to do so. Where it is not possible to serve the notice in advance, we will produce the notice when the premises are entered.

We will seek to obtain a warrant in cases where we consider there are reasonable grounds for believing that entry would be refused or documents would be concealed or interfered with.

Annex B: Consumer Legislation enforced by CAA

Consumer Protection Legislation – Criminal Sanctions

The following pieces of consumer protection legislation include criminal sanctions:

- Regulation EC No 889/2002 on air carrier liability in the event of accidents (providing information about the liability for baggage, how to file for compensation and tariffs for carrying baggage above the liability limit).¹⁶
- Regulation EC No 261/2004 establishing common rules on compensation and assistance to passengers in the event of denied boarding and of cancellation or long delay of flights.¹⁷
- Regulation EC No 2111/2005 on the establishment of a Community list of air carriers subject to an operating ban within the Community and on informing air transport passengers of the identity of the operating air carrier (provision of information about the airline operating the flight and any changes).¹⁸
- Regulation EC No 1107/2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air.¹⁹

Consumer protection legislation – Civil Injunctions

The Enterprise Act covers a wide range of domestic and Community legislation.²⁰ The following list sets out the legislation that we anticipate may be of particular relevance to our enforcement role in aviation. Where the OFT or

BIS has published guidance for business on the legislation covered below we will act in accordance with that guidance:

- SI 1999 No 2083 The Unfair Terms in Consumer Contracts Regulations.²¹
- SI 2008 No 1277 The Consumer Protection from Unfair Trading Regulations.²²
- SI 2002 No 2013 The Electronic Commerce (EC Directive) Regulations.²³
- SI 1992 No 3288 The Package Travel, Package Holiday and Package Tours Regulations.²⁴

In addition to our criminal powers we can also enforce EC Regulation No 261/2004, through our powers under Part 8 of the Enterprise Act. When making a decision on enforcement action we will consider which course of action is the most proportionate. In general this is likely to be the use of the Part 8 powers in order to ensure compliance. The inspection and information provisions of the Enterprise Act also apply to EC Regulation No 261/2004.

The powers relating to the pricing transparency provisions of the following piece of legislation are not yet in place, but we expect them to be based on the civil injunctions process:

- Article 23 of Regulation EC No 1008/2008 on common rules for the operation of air services in the Community.²⁵

Annex C: Criminal Prosecutions

Where a criminal prosecution is considered appropriate the case will be dealt with by the CAA's Aviation Regulation Enforcement Department (ARE). We have limited resources and cannot investigate every report which we receive. In deciding how best to deploy our limited investigative resources therefore, the Head of ARE is bound to take account of the likely success of any investigation and whether it is proportionate to the incident or complaint. The task of deciding which cases to investigate is undertaken by the Head of ARE. Once an investigation is complete, the Head of ARE decides whether to refer it to a CAA lawyer to consider if, in accordance with our prosecution policy, the case should be prosecuted. ARE and Legal Department may also provide advice and assistance to other enforcement authorities when requested to do so. During the process of an investigation by ARE there will be no further consultation with the business as this may prejudice the investigation.

Our prosecution policy is to:

- comply with the Code for Crown Prosecutors;²⁶
- have regard to the Regulators' Compliance Code and the Principles of Better Regulation in so far as they apply to criminal investigations and prosecutions;
- meet our obligations as a signatory to the Enforcement Concordat; and
- pursue the objectives and apply the principles of the Prosecutor's Convention.

We will make available suitably anonymised data

concerning the outcome of our prosecutions. We will also consider drawing media attention to factual information about charges which have been laid before the Courts, but will take great care to avoid any publicity which could prejudice a fair trial. We will also consider publicising any conviction which could serve to draw attention to the need to comply with legal requirements, or deter anyone tempted to disregard their obligations under any of the legal provisions for which we are responsible.

Notes

1 <http://www.caa.co.uk/docs/1743/CAA%20Strategic%20Plan%202011-16%20v2.pdf>.

2 See Annex B for a list of the aviation specific and general consumer protection legislation enforced by the CAA.

3 <http://www.caa.co.uk/docs/2107/Prioritisation%20Principles.pdf>.

4 www.opsi.gov.uk/ACTS/acts2006/ukpga_20060051_en_1.

5 www.berr.gov.uk/files/file45019.pdf.

6 Reducing Administrative Burdens: Effective Inspection and Enforcement, March 2005 – <http://www.berr.gov.uk/files/file22988.pdf>.

7 Regulatory Justice: Making Sanctions Effective, November 2006 – <http://www.berr.gov.uk/files/file44593.pdf>.

8 http://www.legislation.gov.uk/ukpga/2008/13/pdfs/ukpga_20080013_en.pdf.

9 In particular, we expect businesses to update their websites and IT systems regularly and in the future will not accept non-compliance on IT grounds after a new law comes into force, particularly when there has been a reasonable preparatory period.

10 It is not possible to take up all individual complaints and the CAA will prioritise its resources to provide the greatest consumer benefit.

11 <http://www.caa.co.uk/docs/755/CAA%20Prosecutions%20Policy.pdf>

12 Clearly, compliance can be achieved in a number of ways. We will typically work with a business to help identify and implement the most efficient method of compliance.

13 The CAA is currently considering whether, and how best, to reform the arrangements for consumer advocacy and representation. More information is available from <http://www.caa.co.uk/default.aspx?catid=2107&pagetype=90&pageid=12290>.

14 <http://www.caa.co.uk/default.aspx?catid=1357&pagetype=90>.

15 http://www.offt.gov.uk/shared_offt/business_leaflets/enterprise_act/oft512.pdf.

16 <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2002:140:0002:0005:EN:PDF>.

17 http://eur-lex.europa.eu/LexUriServ/site/en/oj/2004/l_046/l_04620040217en00010007.pdf.

18 <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2005:344:0015:0022:EN:PDF>.

19 http://eur-lex.europa.eu/LexUriServ/site/en/oj/2006/l_204/l_20420060726en00010009.pdf.

20 <http://www.legislation.gov.uk/ukpga/2002/40/schedule/13>.

21 <http://www.legislation.gov.uk/uksi/1999/2083/contents/made>.

22 <http://www.legislation.gov.uk/uksi/2008/1277/contents/made>.

23 <http://www.legislation.gov.uk/uksi/2002/2013/contents/made>.

24 <http://www.legislation.gov.uk/all?title=package%20travel%20regulations>.

25 <http://www.caa.co.uk/docs/213/Aviation%20Third%20Package%20Final%20Text%20OCT%202008.pdf>.

26 <http://www.cps.gov.uk/publications/docs/code2010english.pdf>.