



Consumers and Markets Group

19 May 2026

Dear Colleague

Letter to Aviation Industry: Passenger considerations during periods of operational disruption due to fuel supply constraints

I am writing to you today at a challenging time for the aviation industry. We recognise the significant disruption arising from the ongoing conflict in the Middle East, in particular in respect of airspace restrictions, the potential for fuel supply constraints and the consequential impact of the events on consumer confidence. The situation has created significant uncertainties, which are subject to change at short notice, and presents complex challenges for airlines to manage.

With this in mind, we are writing to set clear expectations, including how passengers are supported when services are disrupted, especially where flights are cancelled. While we recognise the efforts many airlines are making in demanding circumstances, this letter is intended to remind industry of its existing obligations and encourage continued focus on passenger needs during this period.

Obligations to only sell flights which are expected to operate

Increasingly, airlines are highlighting a risk of flight cancellations over the summer months. We expect airlines to be mindful of not offering flights for sale where there is a reasonable expectation that those flights will not operate.

We specifically note that under the Digital Markets, Competition and Consumers Act 2024 ('DMCCA'), consumers must be given all the information they need to make informed decisions, in a clear and timely way, which could include information about the likelihood of flights not operating.¹ In addition, the DMCCA may also be breached if there are reasonable grounds for believing that it will not be possible to offer flights advertised at a specific price in reasonable quantities and this is not made clear.²

¹ Section 225 of the DMCCA.

² Paragraph 5 of Schedule 20 of the DMCCA.

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Providing early and clear notice of cancellations

Where flight cancellations are unavoidable, passengers should be given as much notice as possible of the cancellation. Timely notification allows customers to make alternative arrangements, reduces distress and inconvenience, and helps maintain confidence in the aviation industry. Even where decisions are taken at short notice, we expect airlines to communicate with customers clearly and promptly.

Obligations when consolidating flight schedules

We understand from airlines that, where they operate regular flights (i.e. multiple daily flights) to a destination, it may become necessary to reduce the volume of flights operated and consolidate existing bookings into this reduced number of flights.

In undertaking any exercise to consolidate passengers onto fewer flights, we remind you that Assimilated Regulation (EU) No 261/2004 ('UK261') obliges airlines to give priority to carrying persons with reduced mobility and any persons or service dogs accompanying them, as well as unaccompanied children.³

Provision of passenger information

UK261 obliges airlines to inform passengers of their rights during disruption.⁴ We expect airlines to meet this obligation proactively through all available channels, including direct SMS messages, apps, websites and airport communications.

Passengers should receive clear information about:

- the reason for the cancellation, recognising that some details may evolve;
- their available options, including rebooking, re-routing or refunds; and
- any support being offered, such as accommodation, meals or transport where applicable.

We expect information to be presented in a clear, easy-to-understand format, which enables consumers to make informed decisions in what will likely be stressful situations for them.

Appropriate care and support

UK261 also obliges airlines to provide care and assistance during disruption and take reasonable, proportionate steps to look after their passengers.⁵ This obligation applies regardless of the cause of the disruption.

³ Article 11 of UK261.

⁴ Article 14 of UK261.

⁵ Article 9 of UK261.

Handling refunds, rebooking and complaints

If there is a need for large scale cancellations, it will likely lead to increased contact between airlines and passengers. Airlines should ensure that refund and rebooking processes are straightforward, timely and transparent, and that customer service channels are adequately staffed to handle increased demand. Refunds should be made to all passengers within seven days.⁶ Claims and complaints should be handled fairly and promptly, with clear information provided on escalation routes, such as Alternative Dispute Resolution, where customers remain dissatisfied.

Passengers' right to compensation when flights are disrupted

UK261 provides a right to fixed-sum compensation for passengers where they receive less than 14 days' notice of their cancellation, unless the airline can demonstrate that the cancellation resulted from extraordinary circumstances which could not have been avoided even if all reasonable measures had been taken.⁷

While appreciating that the rising price of jet fuel creates significant operational challenges for airlines, the view of the CAA is that decisions by airlines to cancel flights or consolidate schedules for operational or commercial reasons (including fuel prices) would not constitute extraordinary circumstances. We also expect that airlines will typically be able to provide affected passengers with at least 14 days' notice of such decisions, in which case fixed-sum compensation would not apply.

Where flight cancellations arise due to fuel shortages, the position is likely to be more complex. Where it is clear that a cancellation is directly due to a fuel shortage at the airport which prevents the flight from departing, this may be considered extraordinary circumstances. However, where there are multiple considerations driving an airline's decision to cancel a flight (for example, where fuel restrictions mean that some flights operate and others do not), whether the circumstances are extraordinary would depend on the specific facts of each cancellation and would need to be assessed on a case-by-case basis.⁸ We advise airlines to maintain good records of the specific circumstances surrounding each cancellation.

Transparency of jet fuel surcharges

We are mindful of discussion in the media of a risk to consumers of incurring increased costs through jet fuel surcharges. We would like to take this opportunity to highlight that UK consumer protection legislation requires airlines to present the full and final price of

⁶ Article 8 of UK261.

⁷ Articles 5 and 7 of UK261.

⁸ The CAA's interpretation of extraordinary circumstances is illustrative and for guidance only, rather than determinative of our view in any specific case that may arise. Each case will be context and fact specific. This does not mean that a passenger or group of passengers cannot try to claim compensation, including through the courts, if they disagree with our interpretation.

a booking upfront, including any mandatory jet fuel charges. All applicable taxes, charges, surcharges and fees must also be clearly itemised.⁹ Mandatory charges must not be presented incrementally or misrepresented at any stage of the booking process. We therefore consider that price increases to existing flight-only bookings are not permissible.

We note that for package holidays only, price increases may be permitted in limited circumstances under the Package Travel and Linked Travel Arrangements Regulations 2018 ('PTRs').¹⁰ However where consumers are offered a "price promise" at the time of booking that the price of their package will not increase, we expect terms and conditions to reflect this and consider that price increases under PTR Regulation 10 would not be permissible.

Where these rules are breached, consumers may have rights to refunds, cancellation or other redress.

Working collaboratively

We encourage airlines to continue working closely with airports, regulators and government to manage disruption effectively and to share information with passengers in a coordinated way.

We recognise the significant pressures facing the sector and do not underestimate the complexity of operating in the current environment. However, placing passengers at the centre of decision-making and communication, as well as upholding their rights, is critical to maintaining trust and protecting consumers during periods of disruption.

We appreciate your continued cooperation and commitment to supporting passengers during this challenging period.

Yours sincerely,

Anna Bowles

Head of Consumer Protection

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⁹ Flight Pricing information is set out in Article 23 of Regulation (EU) No 1008/2008.

¹⁰ Regulation 10 of PTRs.