

Summary of Responses to the Consultation on the Replenishment of the Air Travel Trust Fund and Proposed Reform of ATOL Bonding

1 Introduction

- 1.1 This document summarises the responses to the proposals outlined in CAP 765, a Consultation on the Replenishment of the Air Travel Trust Fund and Proposed Reform of ATOL Bonding, and should be read in conjunction with that publication. It is a factual summary and is not intended to be a CAA statement on the views expressed.
- 1.2 A full list of the 85 respondents is attached at the end of this document, with links to copies of the responses received. There is also a table with the breakdown of responses by category and of the constituencies of the largest trade associations.

2 Overview

- 2.1 The responses showed that there was widespread support across industry for the proposals to replace bonding with a £1 per-passenger charge, as outlined in CAP 765. There was majority support both by market share of ATOL passengers and market representation by trade associations. Notwithstanding this overall support, respondents raised a number of points that have been outlined in the relevant sections of the summary below.
- 2.2 Six of the seven largest tour operator groups, representing 51% of all licensed passengers, were supportive. Similarly, the main trade associations (FTO, ABTA, AiTO and AAC) expressed support. Together, they represent ATOL holders of all sizes and a significant proportion of the regulated sector, both by volume of ATOL protected passengers and by absolute number of ATOL holders. There was overwhelming support from small business respondents, with 80% in favour. A small number of respondents opposed the proposals. These included the Association of British Insurers, Expedia and the Travel Trust Association (TTA).
- 2.3 A number of respondents raised points that were not directly related to the issues raised in the consultation document. These are set out in the two paragraphs below for completeness.
- 2.4 Firstly, several respondents (including ABTA, FTO, MyTravel, First Choice and Thomas Cook) expressed disappointment at the Government's decision last year not to extend financial protection to all air travellers departing the UK. They were

concerned about the continuing regulatory imbalance between tour operators and scheduled airlines and considered the proposals outlined in CAP 765 as only a step in the right direction. There was a concern that competitive pressures would lead operators to re-organise their business outside ATOL to enable them to compete with scheduled airlines. ABTA, FTO and others considered that a financial protection scheme that protected all air travellers remained the most appropriate solution and would continue to push for this outcome.

- 2.5 Secondly, two respondents (ABTA and Thomas Cook) stated that they considered that the regulatory burden could be further reduced if the CAA was to take on a wider regulatory role, with responsibility for all package travel activities.

3 Consultation Questions – Reform of ATOL Bonding

- 3.1 The vast majority of respondents concentrated their comments on the proposed reform. The summary of responses to questions on the reform has therefore been addressed first.

Section 5: Proposed Reform of ATOL Bonding

The CAA invites responses on its preliminary view that:

- **Reform of ATOL bonding through a per-passenger CPC would bring a reduction in the regulatory burden, through the removal of bonding costs and a reduction in the compliance burden.**

- 3.2 All 85 respondents commented on this point. 76% agreed with this statement and expressed general support for the proposed move from bonding to a £1 per passenger charge. A further 8% agreed that reform was needed, and suggested other mechanisms, such as insurance, should be used to replace bonding, rather than the CPC.

- 3.3 The merits of the current system were highlighted by a small number of ATOL holders who felt that a change was unnecessary. In total, 10 respondents stated that they were content with the current system. A further 3 (a law firm, an SBA¹ holder and a consumer body) either stated that they required more information before they could make a decision or provided comments on various components of the proposal without making an overall judgement.

Comments on the Benefits of the Removal of Bonding Costs

- 3.4 The ABI considered that CAP 765 had overstated the current cost of bonding and in turn the potential reduction in costs that might arise from its removal. On the other hand, there was significant support for the reform from small and medium-sized businesses who agreed that replacing bonding with a £1 per passenger CPC would significantly reduce their costs. This was supported by the response from AiTO, who questioned the insurance industry's estimate of bonding costs and confirmed that the average cost of bonding for its smaller members was nearer the industry estimate of £2 per passenger. FTO also commented on the cost of bonding. Following a review of its members' bonding costs, it concluded that the cost per passenger for its members was now lower than estimated last year, averaging

¹ The 'Small Business ATOL' (SBA) is a licence granted to tour operators who are licence for up to 500 passengers a year.

between 80p and £1.25. Despite this, FTO and the largest ATOL holders expressed overall support for the proposals given other potential benefits such as the release of credit lines currently tied up with bonding facilities. The AAC stated that the need for urgent action was overwhelming and that they supported an end to bonding and its attendant administration.

- 3.5 In CAP 765 the CAA stated that bond obligors contribute to the regulation of the industry through their assessment of licence holders as part of the bonding renewal process. This assertion was questioned by one trade association who expressed doubts as to the extent to which obligors monitored companies for which they issued bonds.

Comments on the Benefits of the Reduction of the Compliance Burden

- 3.6 A number of respondents questioned the extent of any reduction in compliance costs borne by ATOL holders if a CPC was introduced. This included ABI, FTO and ABTA. All three organisations saw an increase in the CAA's monitoring activity as essential and questioned whether the cost of this could realistically be absorbed within its current running costs.
- 3.7 The compliance saving aspect of the proposed reform appears to be an important issue for smaller companies however. One SBA holder, for example, stated that the work involved in estimating quarterly turnover and the complex nature of the bonding market makes compliance with the bonding requirements onerous and time consuming.
- 3.8 These responses suggest that the compliance burden is felt more acutely by the smaller ATOL holders, and the AAC stated in its response that that the proposed reform should go some way to reduce the imbalance in compliance costs felt by different sized licence holders.

Section 6: Financial requirements

The CAA invites responses on its preliminary view that if bonding is removed:

- **Directors of new entrants (and licence holders where there has been a change of control) should be required to provide a financial guarantee to the CAA for four years, as outlined in paragraph 6.8.**
- **These guarantees should be reduced over a four year period, dependent on the administrative record of the licence holder and its ability to comply with its licence terms;**

Directors Financial Guarantees – New Entrants

- 3.9 32 respondents commented on these points, with 81% in agreement with the proposal. AiTO stated in its response that this requirement would ensure that new entrants took the observance of an ATOL licence seriously.
- 3.10 As well as expressing their support, a number of respondents offered suggestions for the implementation of this proposal. For instance, the FTO expressed strong support for financial guarantees for the directors of new entrants, but requested that the CAA consider retaining these beyond the proposed 4 years if the circumstances

required it. This view was also put forward by ABTA and a number of the larger ATOL holders.

- 3.11 These organisations also commented on the level of the proposed guarantees. The AAC stated that it expected the CAA to satisfy itself that the higher cost would not act as a major barrier to entry to the market. The converse view was typified by TUI who questioned whether the guarantees were high enough, and stated that a larger financial investment by directors would act as greater motivation for them to monitor compliance effectively.
- 3.12 The 5 respondents who opposed the proposal cited the level of the guarantee as the reason for their position. These respondents stated that the requirement was too severe or, more specifically, that the proposed level of the guarantees was too high. This view came mainly from licence holders who had recently been granted an ATOL, who were concerned that the proposal would result in an increase in their costs.

Directors Financial Guarantees – Change of Control

- 3.13 Whilst recognising the need for the CAA to manage closely a change of control of an ATOL holder, respondents asked for reassurance that the proposed requirement would not have a detrimental impact on their ability to buy and sell businesses. For instance, ABTA and the larger ATOL holders questioned whether a blanket measure would pose an unjustified restriction on business transfer.
- **In-depth financial assessment should be introduced for licence holders that meet the criteria specified in paragraph 6.11.**
- 3.14 Of the 26 respondents who replied on this point, 92% were in favour of the proposal for targeted assessments to be carried out on specific ATOL holders. FTO reported that its members strongly supported the idea of targeted monitoring, but suggested that the CAA should be more flexible when deciding who should be assessed than is implied in the consultation document.
- 3.15 Many respondents appreciated that the proposed assessments should not require anything from an ATOL holder that would not be produced in normal circumstances by a business. A number requested clarification on the requirements and the process by which that information would be reviewed. Expedia was amongst those with concerns on this point as they felt the additional information that the CAA would require in order to carry out these assessments would take considerably more time to prepare and collate than under the current arrangements. It was also concerned that the information requested would include confidential business information that it would not be prepared to disclose.

Section 7: Licence Compliance

The CAA invites responses on its preliminary view that if bonding is removed:

- **Directors' overtrading guarantees should be removed;**
- 3.16 65% of the 23 respondents agreed with this proposal, as the current guarantees would no longer be relevant in a system without bonds.

- 3.17 Of the 35% who had concerns about the proposed change, a number suggested that the CAA should amend the overtrading guarantee to make it relevant under the new system. ABTA urged the CAA to be cautious in removing a tool that may prevent unscrupulous operators causing calls on the ATTF. FTO stated that they believed the guarantees had acted as a significant incentive to ATOL holders, particularly the smaller ones, to manage their businesses properly and effectively.
- **A minimum standard specification should be set for licence holders' systems;**
- 3.18 27 respondents answered this point, of which 70% agreed and understood the need for minimum standards. These respondents recognised that the existing systems employed by most ATOL holders would meet the requirements proposed in the consultation document, and that the proposal would not be a great burden on a well-run business. Of the remaining respondents who opposed the proposal or who were looking for clarification, a majority expressed concern that the CAA intended to become involved in the day-to-day running of an ATOL holder's business.
- **There should be targeted "audits" of systems to ensure standards are met;**
- 3.19 This proposal received a similar response to that given above. 76% of the 25 respondents agreed that the CAA should carry out a review of companies' systems to ensure they comply. The remaining 24% expressed opposition because of concerns about the CAA's involvement in their businesses or about the CAA's ability to judge the systems.
- **Reporting should be on the basis of booking taken, rather than departure date;**
- 3.20 Of the 31 responses on this point, 84% agreed. The AAC commented that, as many sets of accounts are produced on this basis, this could result in a reduction in the work required from accountants and result in further financial benefits. 16% opposed the idea, citing concerns over the impact of cancelled bookings, on the assumption that they would end up paying for passengers that did not subsequently travel. Eventia, the trade association for conference and incentive travel, expressed concern that it would not be practical for its members to report on a booking basis as it was not possible to determine the number of passengers on a particular booking at the time it was made.
- **There should be tighter requirements around change of control at a licence holder;**
- 3.21 14 of the 21 respondents on this point (67%) agreed with this proposal in principle, including FTO and ABTA. 10% of respondents thought that it was important that this was not introduced as a blanket measure; one medium sized ATOL holder, for example, stated that the requirements should not be imposed if the director has a 'clean' history, whilst another larger ATOL holder raised further concerns about the impact this would have on legitimate business transfer.
- 3.22 As outlined in Section 6, some respondents were unhappy with the concept of providing personal financial guarantees where there had been a change of control at a licence holder and 5 respondents opposed the proposal. W A Shearings, for example, was concerned about the level of influence that the CAA might have when there was a change of control in a business.

- **Each licence holder nominates two “Accountable Managers”, who are responsible for ensuring compliance with the terms of the Licence**

3.23 The proposal on “Accountable Managers” attracted 14 responses, from a range of operators and trade associations. 12 (86%) were in favour, including FTO and AAC who saw this as going some way towards protecting the ATTF. The 2 responses that opposed the concept were concerned that it represented a greater burden on ATOL holders and that such requirements might not be practical. A number of respondents did not state an opinion but asked for more information about the concept.

Section 8: Air Travel Trust Fund principles

The CAA welcomes responses on its preliminary view that the ATTF should be built up through a:

- **Non-refundable £1 CPC applied to all passengers,**

3.24 This proposal attracted 42 responses. 88% agreed that the fund should be built up through a £1 non-refundable CPC. 7% disagreed on the basis that £1 was too high, whilst 2 respondents (5%) thought that the CPC should be set at a higher amount. These 2 respondents, 1 ATOL holder and the card payments association APACS, thought that the CPC should be higher. The ATOL holder believed that passengers would be happy to pay more, whilst APACS stated that a higher CPC might be required to collect sufficient funds to clear the deficit of the ATTF and to cover the liabilities that would fall to it.

3.25 Similar concerns were also expressed by some of the respondents who supported the proposal, particular in relation to the failure of a major operator. A number of respondents stated that the Government should guarantee the ATTF to enable it to meet its obligations to customers if a substantial collapse occurred early in the build-up phase. FTO requested reassurance that this would be the case and AiTO stated that an increase in the CPC to recoup ATTF losses if a large failure occurred would only deepen the regulatory imbalance.

3.26 ABTA supported the concept of a £1 CPC applied to all passengers but raised a query about the nature of the charge i.e. whether it was a charge on the passenger or ATOL holder. It had concerns about whether there might be a conflict between a non-refundable CPC and Regulation 13 of the Package Travel Regulations. ABTA was looking for clarification on this point prior to implementation. The Trading Standards Institute gave its full support to the proposal for a non-refundable £1 CPC as the simplest and easiest form of protection for consumers to understand.

3.27 The larger ATOL holders argued that this proposal did not take into account the different level of risk posed by different ATOL holders, but there was overall acknowledgement that all ATOL holders should charge the same amount for the sake of simplicity.

- **The existing principles under which failure liabilities are apportioned between the credit card companies and the ATT, which are intended to be in the best interests of the consumer, are maintained as far as possible.**

3.28 18 respondents commented on this point and, whilst the majority (61%) expressed support for the proposal, there was no clear consensus on this issue. The trade

associations and larger ATOL holders were divided. ABTA supported the proposal whilst AAC stated that it would accept the proposal if it would avoid a substantial increase in claims to the ATTF.

- 3.29 A number of respondents commented that it was difficult to assess the impact of a change to the current arrangements without greater information on the extent of claims met by credit card companies. There was recognition amongst some respondents, however, that if the ATTF was to meet all liabilities the size of fund and/or the level of the CPC paid by ATOL holders would potentially have to increase. Libra, for example, suggested that further consultation was required to find a solution to balance the risk of high payouts from the ATTF and a higher CPC against the potential increase in merchant fees.
- 3.30 AiTO and FTO, however, expressed their opinion that the ATTF should meet all liabilities in the event of a failure, with both organisations expressing concern that credit card companies would seek greater security if tour operator bonds were no longer provided. TUI and Thomas Cook stated that they considered the proposed reform as an opportunity to reduce merchant acquirer fees and simplify the refunds process.
- 3.31 APACS² argued that customers would expect to be able to make a claim against the ATTF if they had contributed to it through a passenger charge, irrespective of the method of payment used by the customer when they booked. It therefore considered that all claims should be met by the ATTF.

Section 9: Collection of a Consumer Protection Charge

The CAA invites responses on its preliminary view that the CPC should be:

- **Collected from the customer at the point of booking;**

- 3.32 21 responded on the proposal that the CPC should be collected from the passenger when they book their travel arrangements. Supportive responses were received from a full range of ATOL holders as well as the main trade organisations. A total of 86% of the 22 respondents agreed that ATOL holders should collect the charge from the passenger when they book the holiday. Responses suggest that it is straightforward to charge the passenger at the point of booking and agreed that it was logical, as it was the point at which a liability to the ATTF began.
- 3.33 3 respondents, including the trade association Eventia, expressed opposition for the proposal. The business and incentive travel market often collects payment after the booking has been completed, which, Eventia argue, would make it impractical for its members to collect the CPC from their customers at the point of booking.
- **Transparent, disclosed on the customer's documentation;**
- 3.34 There was widespread support from trade associations, consumer bodies and ATOL holders for the CPC to be a transparent charge, with 86% of respondents agreeing with the concept. Only 4 respondents (14%) did not agree.

² APACS is the UK trade association for those institutions that deliver payment services, with specific responsibility for all plastic card payment products such as credit and debit cards. The payment traffic volumes of the association's 31 members account for approximately 97% of the total UK payments market.

- 3.35 FTO supported the proposal but suggested that some ATOL holders might wish to absorb the cost of the CPC, rather than charge the customer, and believed that those ATOL holders should not be penalised for doing so.
- 3.36 The OFT said that they strongly welcomed the suggestion that the CPC be shown as a separate sum on customer documentation. Several trade association who supported the proposal, raised a concern that if the charge was separately identified this might conflict with other legal obligations, in particular the Consumer Protection Act 1987. They requested clarification on this point.

That licence holders:

- **Pay into the ATTF at different times, determined by the level of passengers they are authorised to accept;**

- 3.37 Of the 25 respondents who commented, 68% agreed with the breakdown proposed in the consultation. A small number of respondents argued that the proposal gave certain ATOL holders an advantage, as they would benefit from holding the cash for longer. Some were also concerned that companies might fail holding significant sums payable to the ATTF in respect of passengers booked to travel.
- 3.38 2 respondents (8%) suggested that all returns should be made monthly. This included AiTO, who suggested that all licence holders pay monthly. It highlighted the benefits of such an approach as a means of identifying trading patterns that might warrant further investigation. One respondent felt that everyone should report quarterly.
- 3.39 The vast majority of respondents agreed with the proposal that SBA holders, should pay upfront at the beginning of the licensing year with an adjustment at the end of the year to reflect the numbers of passengers actually booked. 3 respondents (12%), who were all SBA holders, opposed the proposal expressing a desire to be treated the same as larger ATOL holders or citing concerns that they would be significantly overpaying considering their current trading patterns. An equal number of SBA holders agreed with the proposal, as they saw this as giving them freedom to trade up to the 500 passenger limit without the need to vary, and accepted that the need to pay upfront was balanced by the convenience of one annual payment.

And that a penalty regime is put in place, which includes;

- **Comprehensive “audits” of licence holders’ systems;**
 - **An ability to obtain CPC payments more regularly, or in advance in cases of late reporting/payment;**
 - **Interest penalties for late payment; and**
 - **In extreme cases, formal action to suspend or revoke an ATOL for non-payment.**
- 3.40 All the responses that commented on this point recognised that the CAA requires a penalty regime to ensure that CPC payments are made by ATOL holders to the ATTF on time. All except two of the 22 respondents agreed with the proposal as outlined in the consultation. Of those two, one suggested that the CAA should introduce more severe penalties, whilst the other, Eventia, argued that such a

penalty regime conflicted with the lower burden of regulation that the reform set out to achieve.

Section 11: Transitional arrangements

The CAA invites responses on its preliminary view that:

- **Bonds should be replaced at the point a CPC is introduced;**

3.41 86% of the 21 respondents, agreed that bonding should be removed at the same time a CPC was introduced, to avoid a dual system that would increase the burden on ATOL holders. The 3 respondents that disagreed were travel industry specialists that provide advice to the industry; they expressed concerns over the ability of the ATTF to meet liabilities in the build up stage.

- **A licence holder should begin collection of a CPC from customers at the same time;**

3.42 All 19 respondents who commented agreed that all ATOL holders should start collecting the CPC at the same time.

- **The changeover to a CPC should take place at the renewal in September 2007.**

3.43 81%, of 27 who commented, agreed that this should take place in September 2007. 11% of respondents felt that September 2007 was too soon for the CAA to have the appropriate systems in place. Bastion Surety and ABTA questioned whether this timescale was practical; ABTA suggested that the CAA should delay implementation if that would result in a more complete system.

3.44 The remaining 7%, all smaller ATOL holders, wanted the system in place earlier so that industry could enjoy the benefits sooner. There was some concern expressed about the availability of bonds in the run-up to any change, dependent on how obligors react to the proposed reform. For example, Western & Oriental stated it was not inconceivable that the availability of bonding within the insurance market would reduce significantly, making it difficult for ATOL holders with March renewals to raise sufficient bonding for the six-month period to September 2007.

4 Consultation Questions – Replenishment of the Air Travel Trust if Bonding Remained

4.1 The first section of CAP 765 addressed the issue of the replenishment of the ATTF in the event that bonding remained.

Section 4: Replenishing the Air Travel Trust Fund (“ATTF”)

The CAA invites responses on its preliminary view that if bonding remains:

- **The ATTF should be built up to £90m and maintained at this level**

4.2 71% of the 24 respondents who answered this question agreed that a fund should be built up to £90m (if bonds remained). This included responses from AiTO and

AAC. ABTA and FTO believed that this level was too high. In total 25% of the respondents opposed the proposal, with a number stating that they believed a lower target level should be sufficient if an insurance product was used to provide additional access to funds in the event of tour operator failure.

- **The per passenger charge should be set at £1**

- 4.3 Many respondents were concerned at the burden that a passenger charge would place on ATOL holders, if this were an additional requirement to bonding. 77% of the 43 respondents that commented on the level of the CPC agreed that £1 was appropriate, although many of these questioned whether this should be introduced in conjunction with bonding. 12% of respondents felt that, if a levy was required whilst bonding was still in place, the CAA should collect a higher amount to shorten the length of time it would take to replenish the fund. A further 10% expressed concern that £1 was too high if bonding remained. For instance, ABTA said that an ongoing bonding cost together with a requirement to impose a charge per passenger would only add to the regulatory imbalance in the sale of air seats that is currently felt by ATOL holders. It could not therefore support this proposal.
- 4.4 In summary, it was apparent from respondents that if bonding remained there was no overall agreement either on the appropriate size of the ATTF or how it should be funded.

Information about the respondents

Breakdown of Respondents

Category	Number of Responses
ATOL holders	
SBA	25
Other	38
Bond Obligors/Insurers	3
Travel Trade Associations	6
Professional advisors	4
Consumer Bodies	5
Airlines (inc ELFAA)	2
Other	2
Total	85

Area of Representation of Main Trade Associations

Organisation	ATOL holders	Constituency
FTO	13	The largest four operators plus a range of companies in the Top 30. They are primarily traditional package tour operators. Its members represent 55% of all licensed passengers.
ABTA	760	Represent a wide range of businesses by type and size (travel agents and tour operators). Roughly two thirds of businesses are licensed for less than 5,000 passengers.
AiTO	150	Predominantly represent medium sized ATOL holders, specifically independent, owner-managed specialist operators.
AAC	57	Represent scheduled flight only specialists. Members represent more than 50% of that sector.
TTA	250	An association of 500 independent travel companies who provide financial protection through a combination of trust account and insurance arrangements. Of the 250 TTA members who have been granted an ATOL, 97% hold an SBA.

Written responses were received from:

[Accolade Holidays Ltd](#)
[Active Adventures Ltd](#)
[Air transport Users Council \(AUC\)](#)
[Airholidays Ltd](#)
[Amro Holidays Ltd](#)
[Andante Travels Ltd](#)
[ANS Travel \(International\) Ltd](#)
[APACS \(Credit Card Trade Association\)](#)
[Association of ATOL Companies \(AAC\)](#)
[Association of British Insurers \(ABI\)](#)
[Association of British Travel Agents \(ABTA\)](#)
[Association of Independent Tour Operators \(AITO\)](#)
[Atkins Travel t/a Prestige Holidays](#)
[ATM Travel Ltd](#)
[Bastion Surety](#)
[Bateman K t/a Caledonia Languages Abroad](#)
[Beachcomber Tours Ltd](#)
[British Airways](#)
[Bryan Somers Travel Ltd](#)
[Burnett G t/a Interchange](#)
[Chaudhury, N & Lines, J t/a CL Travel](#)
[Chiltern Trains Ltd](#)
[China Holidays Ltd](#)
[Complete North America Ltd](#)
[Conderbury Ltd t/a Sunbird Tours](#)
[Cosmos Holidays Plc](#)
[Discover Ltd](#)
[Donaghy, N t/a Celtic Bird Tours](#)
[Durmast Travel Ltd](#)
[European Low Fares Airline Association \(ELFAA\)](#)
[Eventia](#)
[Excel Airways Group Plc](#)
[Expedia.com Ltd](#)
[Federation Tour Operators \(FTO\)](#)
[First Choice Holidays & Flights Ltd](#)
[Flight Centre \(UK\) Ltd](#)
[Fred Olsen Cruise Lines Ltd](#)
[GB-GT Ltd t/a Ghana Tours](#)
[Genesis Motivation Ltd](#)
[Gold Star Travel Ltd](#)
[Goldleaf Enterprise Ltd t/a TEJ Air Travel](#)
[Hall, A & Hall, C t/a New Horizons](#)
[H-C Travel Ltd](#)
[Himalayan Connection Ltd](#)
[Honeyguide Wildlife Holidays Ltd](#)
[Kirker Travel Ltd](#)
[Lane & Partners](#)
[Last Frontiers Ltd](#)
[Leisure Management International Ltd t/a Flying Fish](#)
[Libra Holidays Ltd](#)
[Link Overseas Exchange Ltd](#)
[Link Travel Ltd t/a Sherpa Walking Holidays](#)
[Lotus Group Ltd](#)
[Medway Travel Management Ltd](#)
[Midlands Co-operative Society Ltd](#)
[Minorca Sailing Holidays Ltd](#)
[MyTravel Tour Operations Ltd](#)
[Naturally Morocco Ltd](#)
[Office Fair Trading \(OFT\)](#)
[Oonas Divers Ltd](#)
[Orbital Travel Ltd](#)
[Personal Service Travel Ltd](#)
[Ramblers Holidays Ltd](#)
[Rashid A & Rashid T t/a A. R. Travel](#)
[Saga Holidays Ltd](#)
[Sam McKee Ltd](#)
[Scottish Passenger Agents Association \(SPAA\)](#)
[Silver Ski Holidays Ltd](#)
[Sloan, La Rue & Chang-Leng t/a Stylish Resorts](#)
[Strandtown Travel Ltd](#)
[Sunways Travel Ltd](#)
[Tayler, J. S. & Tayler, M t/a Solmar Villas Teletext Ltd](#)
[Thomas Cook UK Ltd](#)
[Trading Standards Institute - Essex](#)
[Trading Standards Institute - Sussex](#)
[Travel & General Insurance Company Plc](#)
[Travel Trade Consultancy Ltd](#)
[Travel Trust Association](#)
[Travelwise Ltd](#)
[TUI Northern Europe Ltd](#)
[Vantis NM LLP](#)
[Virgin Holidays Ltd](#)
[Vitalise Ltd](#)
[WA Shearings Holidays Ltd](#)
[Western & Oriental Travel Ltd](#)