

31 October 2008

Ms Cathryn Geraghty
Commission for Aviation Regulation
3rd Floor
Alexandra House
Earlsfort Terrace
Dublin 2

info@aviationreg.ie
Phone 01 6611700
Fax 01 6611269

Dear Ms Geraghty

The current legislation provides full consumer protection for groups from Schools and Clubs who book tours abroad through any of the 290 licensed travel agents or the 74 licensed tour operators in Ireland.

I have read the consultation paper on the review of travel trade legislation in Ireland and would like to raise the following points for consideration in respect of the following parts of the paper:-

- page iii/ 12
- page 18/ 3.18
- page 19/3.23
- page 22/3.36
- page 44/option 18 - the entire page

From our experience Schools take multiple trips per year. Some Schools take up to 5 groups away per year with an average of approximately 2 School tours per secondary school travelling abroad each year. We estimate that approximately 60,000 to 70,000 students from second level Schools travel abroad each year.

The JMB (Joint Managerial Body) represents the interests of all voluntary secondary Schools in Ireland. It is the main decision-making and negotiating body for the management authorities of over 400 voluntary secondary Schools and they have issued recommendations to Schools instructing them to book School group tours with licensed travel agents on the grounds of group leader and School liability, responsibility for tour funds and ensuring professionalism in organising School tours. The Department of Education in circulars issued in 2007/8, specifically bulletin 4, has also stipulated that Schools book tours abroad through licensed travel agents.



NST, Santry Business Park, Swords Road, Dublin 9, Ireland

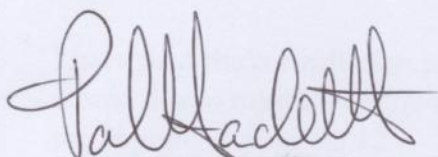
Telephone + 353 1 8940 300 Fax + 353 1 8622 589 Email info@nst.ie Website www.nst.ie

Clubs too make multiple trips, and the estimated size of this market is approximately 20,000 to 30,000 passengers per annum. Clubs and organisations have a full range of travel agents all over the country who provide them with competitive services and full protection for their funds. I'm not sure that either Schools or Clubs would see any advantage in being exempted from the legislation given they are currently working effectively within the legislation by booking with licensed travel agents.

The recommendations in the consultation paper, specifically option 18 to exempt Schools and Clubs from the legislation would remove consumer protection from parents, students, Schools, Clubs and members of Clubs. We don't see the benefit in removing this protection given that the current legislation and market conditions are working and provide full protection once the School or Club book through a licensed travel company.

We recommend that there be no change in the legislation and that no exemptions be given to Schools and Clubs. This will ensure that the 100,000 or so passengers who travel with them each year and book through licensed travel companies in Ireland continue to enjoy full protection.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Paul Hackett', written over a horizontal line.

Paul Hackett
Managing Director