

9th trilateral (D/A/CH) informative meeting on Regulations (EC) No 261/2004 and 1107/2006, Vienna, 8 October 2026

Enforcement of Air Passenger Rights by the Consumer Protection Cooperation (CPC) Network

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1) Context: Air Passenger Rights as consumer rights in the EU's framework for the public and private enforcement of consumer law

a) Private enforcement

- Alternative Dispute Resolution (ADR) Directive 2013/11
- European Consumer Centres Network (ECC-Net)
- Representative Actions Directive (RAD) 2020/1828

b) Public enforcement: CPC Regulation 2017/2394

2) The CPC enforcement framework – how does it work in practice?

a) Mutual assistance mechanism

b) Coordinated actions (widespread cross-border infringements of consumer law)

- Alerts
- Common Positions and Requests for Information
- Negotiation and acceptance of commitments
- Monitoring of commitments and enforcement

c) Sweeps

3) Coordinated CPC actions to enforce air passenger rights – examples and impact

a) 2021 action to enforce cancellation-related rights against 16 major EU airlines

b) 2023 CPC action against three major Online Travel Agencies (OTA)

c) Impact

- Immediate effect on consumers
 - 2.5 million consumers offered to exchange vouchers for reimbursement; 500k consumers making use of that option
 - stark drop in complaints
- Extension of commitments to other companies in the sector
 - De facto compliance by airlines not addressed by the airlines action
 - Sing-up by two additional major EU OTAs to the commitments under the OTA action
- Commitments as blueprint for filling a legislative gap
 - the new regime for intermediaries in the revised Air Passenger Rights Regulation
- Commitments as blueprint for preventing large-scale infringements in subsequent crises
 - COM Guidance for the EU transport sector in Middle East crisis (C[2026] 3172 final)

4) Outlook: CPC review – making the current public enforcement framework for consumer rights more effective and deterrent
