

Consultation
On
Strategic Plan 2017-2019

Commission Paper 2/2017

23 February 2017

Commission for Aviation Regulation

3rd Floor, Alexandra House

Earlsfort Terrace

Dublin 2

Ireland

Tel: +353 1 6611700

Fax: +353 1 6611269

CONTENTS

1. Introduction	3
2. About the Commission for Aviation Regulation	4
3. Mission and Strategic Goals.....	5
4. Efficient, High-Quality Airport Services	6
5. Safe and Financially-Robust Airlines and Groundhandlers	10
6. Financially Strong Travel Agents and Tour Operators	11
7. Robust Framework to Enforce Passenger Rights.....	13
8. Regulation that Represents Best International Practice	14
9. Summary of Goals, Objectives and Actions.....	16
Appendix 1 Organisation Structure	19

1. Introduction

This is the first Strategic Plan that the Commission for Aviation Regulation has published for a number of years. We have decided to publish this Plan for consultation, because there are a number of areas where we need to consider changes to the regulatory framework currently in place. Our last price determination for Dublin Airport was made in 2014 and runs for the period 2015 to 2019. The next determination needs to be in place by late 2019. Now is the time to review and improve the processes we used in the last determination to apply in the next round. This would include considering the potential for improving the level of consultation between the airport, airlines and passengers and examining the regulatory model to ensure it is sufficiently flexible to adapt to changing circumstances; for example, the recent unexpected growth in passengers going through Dublin Airport.

There is also a new European Directive that needs to be in place by mid-2018 concerning the rights of people who buy package holidays from Tour Operators and Travel Agents that are licensed by this Office or by other European Member States.

This Strategic Plan, for the period 2017 to 2019, clearly sets out what we intend to concentrate on in the next three years and will underpin our work plans for the same period. We will be reviewing our Strategic Plan each year to make sure it remains relevant.

This is a consultation paper and interested parties are invited to provide comments by close of business on 24th March 2017. As responses may be published in full on our website, respondents should highlight if they wish their response to be kept confidential.

Responses and submissions to this paper should be marked as a response to the **Strategic Plan** and forwarded to:

Commission for Aviation Regulation
Alexandra House
Earlsfort Terrace
Dublin 2
D02 W773
Email: info@aviationreg.ie

2. About the Commission for Aviation Regulation

The Commission for Aviation Regulation regulates certain aspects of the aviation and travel trade sectors in Ireland. It was established on the 27th February 2001 under the Aviation Regulation Act, 2001. It is an independent public body under the auspices of the Department of Transport, Tourism and Sport and is accountable to the Houses of the Oireachtas.

The Commission is in charge of setting the maximum level of airport charges at Dublin Airport for regulatory periods of a minimum of 4 years. Dublin Airport is subject to economic regulation since it has significant market power in the Irish airport market. This means that if there is no price regulation, Dublin Airport can set the prices that it charges to airlines using its facilities at levels that are higher than necessary. This is true for any company that has significant market power. Our role is to set a price which closely mirrors what might be charged in a competitive environment thus protecting the interest of users of the airport. We also ensure that the infrastructure and services provided meets the needs of the users. The charges collected by the airport are passed through to passengers by the airlines, as part of the price of their ticket.

The Commission is responsible under EU legislation for discharging Ireland's responsibilities for schedule coordination/slot allocation at Irish airports and the appointment, where necessary, of a schedules-facilitator/slot-coordinator. Dublin Airport is the only coordinated airport in Ireland, where demand exceeds capacity. This means that more airlines than can be accommodated want to fly out of Dublin Airport at the same time. It is our responsibility to appoint someone to decide at what time each airplane can take off or land. A company called Airport Coordination Limited currently carries out this function at Dublin Airport.

The Commission licenses the travel trade in Ireland. Tour Operators and Travel Agents apply each year and we issue them with licences when they meet certain criteria. As part of this function, the Commission administers a bonding scheme and a travellers' protection fund. This allows us to reimburse many travellers in the event of a licensed travel agent collapse.

The Commission is also responsible for licensing Irish-based Air Carriers in accordance with EU legislation. It is also the competent authority in Ireland for approving groundhandling operations at Dublin, Shannon and Cork Airports.

The Commission has a significant role to play in addressing complaints against airlines and all airports in Ireland. We are the agency you contact if you have been denied boarding, have been downgraded or if your flight has been cancelled or delayed. When necessary we will forward your complaint to another regulator, as we can only deal with airlines flying out of Ireland or EU airlines flying directly into Ireland from somewhere outside Europe.

In addition, we work to ensure that people with disabilities or reduced mobility are offered the same opportunities for air travel comparable to those of other citizens at all Irish airports. To this end we deal with queries and complaints where an airline has refused to allow a passenger on board. We also set out what assistance these passengers should expect from airports and airlines. Finally, we look at compensation for lost or damaged wheelchairs, mobility equipment or assistive devices.

Appendix 1 sets out our organisation structure.

3. Mission and Strategic Goals

The Commission for Aviation Regulation has developed a Strategic Plan for the period 2017 to 2019 to provide information to Air Passengers, Travel Agents, Tour Operators, Airlines, Groundhandlers, Airports and other stakeholders about our high-level work objectives for the next three years. These objectives may change over time due to changes in our working environment. At the moment the Department of Transport, Tourism and Sport is carrying out a review of airport charges regulation. The conclusion of this study may impact on the work carried out by the Commission. Even with this uncertainty, we think it is important to provide stakeholders with information on what we intend to do in the short- to medium-term. We will, of course, adjust our strategic objectives in light of any changed circumstances as they occur.

Over the next three years, the mission of the Commission for Aviation Regulation will be to protect the interests of Air Passengers. We will achieve our mission by focusing on five strategic goals. We will focus on delivering:

- ❖ Efficient, high-quality airport services
- ❖ Safe and financially-robust Airlines based in Ireland and Groundhandlers at the three state airports
- ❖ Financially strong Irish Travel Agents and Tour Operators
- ❖ A robust framework to enforce passenger rights in all Irish airports
- ❖ A regulatory framework that represents best international practice

In this Strategic Plan, we list the objectives that we need to achieve to meet our goals. We also provide more detail on the actions that we will undertake to achieve our objectives.

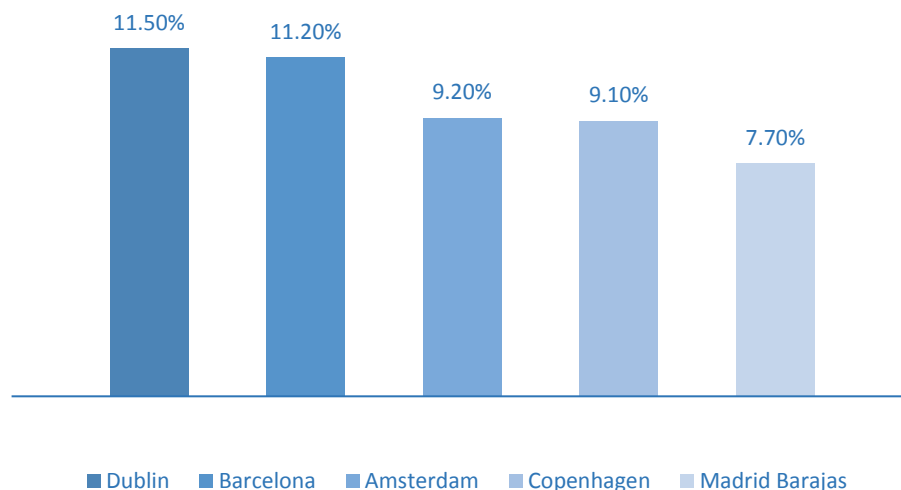
We plan to achieve our strategic goals while striving for the best use of resources, value for money and operating under strict corporate governance arrangements. We will monitor our performance against this plan at the end of each year and include a commentary in our annual report.

4. Efficient, High-Quality Airport Services

One of the key objectives for the Commission for Aviation Regulation for the period 2017 to 2019 will be to apply price cap regulation to Dublin Airport in line with our three statutory objectives¹. We must protect the reasonable interests of current and prospective users of Dublin Airport. We must also facilitate the efficient and economic development of Dublin Airport which meets the requirements of current and prospective users of Dublin Airport and we must enable Dublin Airport to operate and develop in a sustainable and financially-viable manner.

This will be done in the context of a fast-changing industry. Dublin Airport was the fastest-growing Airport in Europe in the first semester of 2016, within the group of airports that welcome more than 25 million passengers annually. Growth at Dublin Airport was higher than expected by ourselves, the airport and the airlines. Conversely, in the late 2000s there was a dramatic and unexpected reduction in passengers travelling through Dublin Airport. Given that we regulate Dublin Airport charges on a five year cycle, these examples highlight the need to incorporate sufficient flexibility in the regulatory model to deal with uncertain demand for services and infrastructure.

Figure [1]: Dublin Airport is the Fastest-growing in Europe in 2016*



**Within the group of airports welcoming more than 25 million passengers annually.
Table Source: ACI EUROPE Airport Traffic Report released on 17th February 2017.*

Objective 1: Set efficient charges at Dublin Airport

- ❖ To set a price cap for Dublin Airport for the next regulatory period 2020-2024, which emulates as closely as possible a competitive outcome, in order to protect the interests of current and prospective users. Extensive consultation in 2018 and 2019 will inform this price cap. Prior to this, we will develop policy which is in accordance with best regulatory practice and which allows us to achieve our statutory objectives. Competitive airport

¹ In 2016 The Department of Transport, Tourism and Sport commenced a review of economic regulation of Irish airports. Implementing any new legislative framework derived from the review will form part of our 2017-2019 strategy.

charges benefit passengers directly, through reduced fares and indirectly, through a larger number of routes becoming profitable for airlines, especially for low cost and short haul routes. For instance, as noted in our submission to the consultation of the Department of Transport, Tourism and Sport², airport charges for a low cost airline such as Ryanair were 13% of its costs for the financial year ended 31 March 2016.

Table [1]: Airport charges as a proportion of low-cost airline’s costs and ticket prices paid by passengers

Ryanair Costs / Year ended March 2016		
Fuel	€19	32%
Airport and handling charges	€8	13%
Route charges	€6	10%
Staff costs	€6	9%
Other	€9	15%
Operating Profit	€14	22%
Total	€61	100%

Source: Ryanair Annual Report 2016

- ❖ To regulate and monitor the cost-efficient provision of capital projects, in particular the North Runway project, giving incentives for Dublin Airport to operate efficiently and sustainably to the benefit of current and future users. The North Runway is the second largest project at Dublin Airport since regulation started in 2001, following the construction of Terminal 2.

Table [2]: The North Runway as % of the Total Capital Allowance for 2015-2019

Type of Allowance	Amount	Share
North Runway	€246.7m	38%
Other Triggered Allowance	€61.3m	9%
Allowed Flexible	€260m	40%
Allowed Non-flexible	€81m	12%
Total	€649m	100%

Source: CAR 2014 Determination

- ❖ To continually monitor the compliance of airport charges, as well as fees charged to airlines for passengers with reduced mobility and the quality of service measures at Dublin Airport, to ensure passengers, including those with disability, continue to have access to effective, high-standard services.

²

http://www.aviationreg.ie/_fileupload/2016/2016-09-16%20CAR%20response%20to%20dept%20consultation.pdf

Figure [2]: Consumer Satisfaction at Dublin Airport

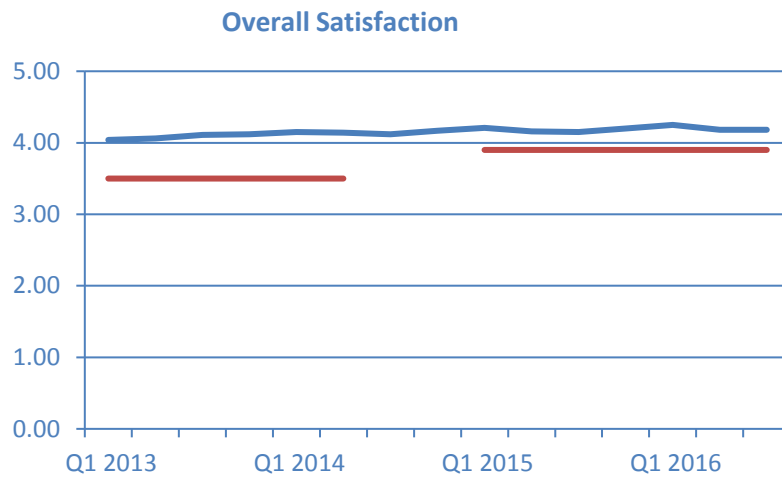


Table Source: Dublin Airport reported ACI Survey Results.

Objective 2: Increase stakeholder involvement in decision making

Figure [3]: Dublin Airport and stakeholders

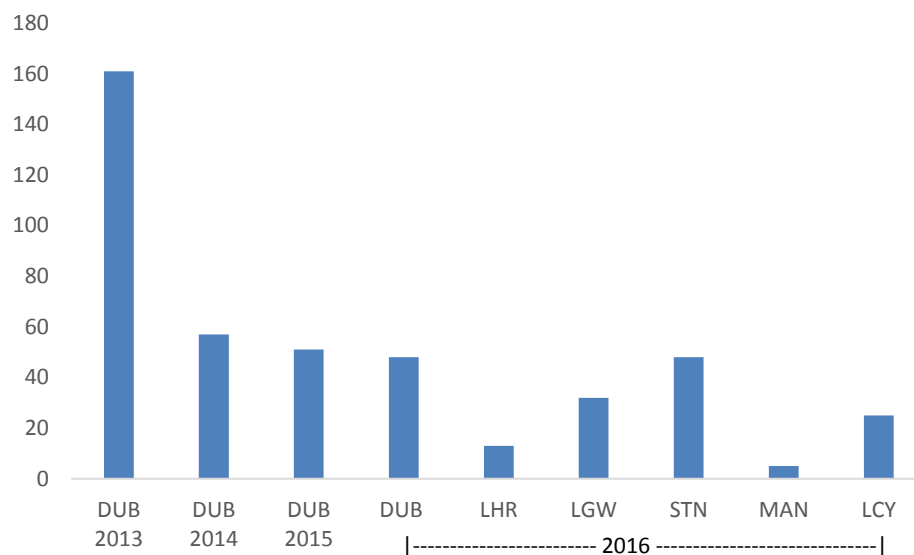


- ❖ To put in place a framework to encourage an increased level of consultation on airport charges and new infrastructure. Meaningful and transparent consultation between Dublin Airport and stakeholders is essential, given the lack of competition that would otherwise ensure that airport charges are justified and that required capital infrastructure is supplied at minimum cost. This will also help to prevent investment in infrastructure that is not needed or cost-inefficient. This will assist us in achieving our objective to facilitate the efficient and economic development of Dublin Airport to meet the requirements of current and prospective users.
- ❖ To examine how to better engage the passenger in the regulatory process and to ensure the service provided and the cost paid matches their expectations. The Commission will endeavour to implement new mechanisms to become better informed of the views and needs of passengers and to better reflect them in the airport charges determination.

Objective 3: Promote competition and facilitate new entry into relevant markets

- ❖ To declare slot-coordination parameters at Dublin Airport in a way that makes best use of available infrastructure. This should help potential new airline entrants and benefit passengers. Dublin Airport is a level 3 airport (fully coordinated), where demand exceeds capacity, and slot allocation permits the efficient use of the limited airport resources to the benefit of airport users and passengers.
- ❖ To engage an independent slot-coordinator at Dublin Airport to allocate airport slots in a neutral, efficient, and transparent manner and in accordance with the IATA Worldwide Slot Guidelines.
- ❖ To enforce sanctions against Airlines operating without a slot at Dublin Airport. Sanctions have been effective at reducing such operations, although they remain higher compared to those in airports in London and Manchester in the UK in 2015.

Figure [4]: Operations without slot at Dublin Airport.



- ❖ To ensure that Access to Installation (ATI) fees charged to Groundhandlers at Dublin, Cork and Shannon Airports are relevant, objective, transparent, and non-discriminatory, thus allowing fair access to the market.

5. Safe and Financially-Robust Airlines and Groundhandlers

The Commission is the competent authority in Ireland for licensing of Air Carriers and approving Groundhandlers operating at Irish airports. All Air Carriers who transport passengers for hire or reward must hold a valid Operating Licence and Air Operator's Certificate. An Operating Licence is issued by the Commission for Aviation Regulation to Air Carriers who have their principal place of business in Ireland. A licensed Air Carrier must also have, and for the duration of the Operating Licence hold, an Air Operator's Certificate (AOC). The Irish Aviation Authority is responsible for the granting of AOCs to Irish Air Carriers. Licensed Air Carriers are monitored closely to make sure they meet a number of requirements including safety standards, satisfactory insurance cover and financial fitness.

The Commission also grants approvals to companies engaged in groundhandling activities at Cork, Dublin and Shannon airports. Groundhandling broadly comprises all those services required by an aircraft between landing and take-off; for example marshalling aircraft, loading/unloading, refuelling, baggage handling, passenger handling and aircraft maintenance. An airline may choose to provide services for itself (self-handling) or contract with another company (third-party handling), be it an airline or a dedicated groundhandling company. The Commission ensures that groundhandling approval holders comply with legal requirements such as financial fitness and technical competence.

The Commission currently licenses 14 Irish-based Air Carriers and 45 Groundhandling operators at Dublin, Shannon and Cork Airports. The total number of licences in issue over the last number of years has remained constant, with only marginal changes from year to year. This trend is expected to continue; although the implications of Brexit may bring a level of uncertainty as UK-based airlines could seek to apply for an Irish operating licence in order to allow them to continue to avail of access to European routes following Brexit. Other airlines have also signalled their intention to apply for an Irish Operating Licence due to the various supports available here in order to allow them to compete more effectively in the industry. In addition, economic recovery has contributed to growth at our airports, especially at Dublin. This growth, and future anticipated growth, may result in an increase in licence holders and/or expansion by existing licence holders, especially in the groundhandling area as demand for these services increases.

Although there are no significant changes expected to the regulatory framework in these areas, the Commission will be monitoring the impact of the European Commission revision of the EASA Basic Regulation, which includes proposals for the introduction of requirements for the safe provision of groundhandling services. It will be necessary to consider how any new proposals will sit with the existing groundhandling regime in place in Ireland. Similarly, we will monitor the European Commission evaluation of the application of Regulation (EC) No 1008/2008 and any changes in legislation going forward.

Objective 1: Operate an efficient process for licencing airlines and ground handlers

- ❖ Continue to be effective by keeping our systems and internal processes under review.
- ❖ Review timelines for responses, processes for licence issue, reviews, renewals, withdrawals or revocations.
- ❖ Further coordinate processes with the IAA in our respective roles of issuing licences to airlines and review our information-sharing arrangements.

6. Financially Strong Travel Agents and Tour Operators

Many people buy holidays from Travel Agents and Tour Operators. These companies can be based in Ireland, elsewhere in Europe and outside Europe. There are a range of rules, set out in legislation, that are used to determine if licences are required.

The Commission will issue licences to Travel Agents and Tour Operators who have demonstrated that they have the necessary business, organisational and financial capabilities and have put a bond in place for the protection of the travelling public. These bonds, together with a travellers' protection fund, are used to provide protection to some classes of customer in the event of a collapse (either by issuing refunds or arranging repatriations).

Legislation underpinning the current bonding and travel protection arrangements dates back to 1982 and since then there have been significant developments in how people book and pay for their holidays, particularly with the advent of the internet. The EU Services Directive and cross-border trading rules have led to amendments in the laws in Ireland. As a result, the type and level of protection available to Irish customers may vary depending on the location of the company they are booking their holiday with, and the type of products that are being purchased.

A new European Commission Package Travel Directive (2015/2302/EU) has been adopted, which aims to harmonise protection across Member States. This Directive needs to be transposed into Irish legislation by January 2018 and will come into force in July 2018. This may bring changes to the regulatory environment for the sector, as well as changes to how this office carries out its functions. The Commission will work with the Department of Transport, Tourism and Sport and the travel trade industry to develop a clear understanding of the requirements of the Directive and any changes that may be required to be made to existing arrangements. This will be a key area of work during 2017 and we will consult widely with the travel trade industry and other interested parties when developing options.

Recent years have seen some growth in the travel trade industry, with the number of licensed Travel Agents increasing slightly each year. The majority of new applicants have been non-Irish companies. Since the vote by the United Kingdom to leave the European Union, we have noted a slight increase in interest from companies established in the UK seeking to open a branch in Ireland. In time we can determine if this becomes a trend.

Every year Travel Agents and Tour Operators apply to the Commission for a licence. We assess their financial, business and organisational capabilities before deciding whether or not to issue a licence to an applicant. Once a licence is issued, we continue to monitor the performance of Travel Agents and Tour Operators to determine if they are complying with the licence conditions.

Unfortunately, company collapses do occur and in the last six years there have been four such incidences. In each case the Commission has administered refunds to affected customers. The most significant collapse occurred in July 2016 (Lowcostholidays Spain SL), which resulted in over 4,000 claims. We will be reviewing current bonding and customer protection arrangements to ensure that they remain fit for purpose.

Objective 1: Implement requirements of the Package Travel Directive

- ❖ We will work closely with the Department of Transport, Tourism and Sport, the travel trade industry and other interested parties to determine what changes need to be made to current regulatory arrangements in order to comply with the 2015 Package Travel Directive (for example, in the areas of licensing, bonding and travel protection). In tandem with this, we will review our own internal processes to ensure we can continue to fulfil our legal remit.
- ❖ We will work with the travel trade industry and other interested parties to identify options and implement any changes that need to be made. We will consult widely and aim for a smooth transition from the current scheme to the future one.

Objective 2: Provide adequate protection to the travelling public

- ❖ We will review current bonding and travel protection arrangements in consultation with stakeholders to ensure they remain effective given our experience of company collapses over time.
- ❖ Some companies sell holidays to customers without having the necessary licence in place. If such a company were to collapse, its customers are not protected by our scheme. We will continue to review our internal processes for monitoring the sector so that we can effectively investigate such activities.

7. Robust Framework to Enforce Passenger Rights

The Commission deals with queries and complaints where passengers are denied boarding or their flight is cancelled or subject to a long delay. In addition we enforce the rights of disabled persons and persons with reduced mobility when travelling by air.

The public's awareness of their rights has grown steadily in recent years and this trend is actively encouraged at both national and European level, through a mixture of media campaigns and other advertising strategies. However, from our experience there is room to further increase the public's awareness of their rights. This increased awareness, coupled with the sectoral growth projected by many airports in Ireland, may lead to an increase in the volume of complaints received by this office in the coming years. Brexit may, in time, result in an increase in complaint volumes, by virtue of the fact that passenger complaints arising from flights departing in the UK and arriving into Ireland, will now fall within our remit. This differs from the situation today where these complaints are dealt with by the Civil Aviation Authority in the UK.

In light of this, our strategy for the period 2017 to 2019 is twofold. Against a background of a likely increase in volume of complaints, we will review our complaint-handling service to ensure it continues to operate effectively. It is worth noting that for every 1,000 valid complaints that we deal with, we also assist over 3,000 other individuals by providing them with information (see Table below). This effort may be better directed at increasing public awareness of air passenger rights, which in turn may reduce the volume of queries received.

Table 3: Overview of complaint versus query volumes from 2010 - 2015.

	Queries	Valid Complaints	Total
2015	3844	1019	4863
2014	3039	1170	4209
2013	3058	1251	4309
2012	2449	823	3272
2011	2954	1151	4105
2010	4311	821	5132

Objective 1: Deal with passenger complaints efficiently, effectively and fairly

- ❖ Review our complaint-handling processes, investigating opportunities to reduce volume of queries that fall outside our remit.

Objective 2: Increase the travelling public's awareness of their rights

- ❖ Develop a communications plan, including a review of our websites, to increase awareness of air passenger rights.

8. Regulation that Represents Best International Practice

The world within which CAR operates is not static. By way of example, the new Package Travel Directive is likely to bring changes to how we licence Travel Agents and Tour Operators and changes to how customers are protected in the event of a company collapse. This will present a challenge to the Commission to ensure that Ireland has the appropriate customer protection measures in place. However, all Member States have to carry out a similar exercise and it is important that we learn from the experiences of other Member States, to ensure we have a regulatory framework in Ireland that best suits the needs of Irish customers.

The Department of Transport, Tourism and Sport is consulting on the economic regulation of airport charges and the outcome of that process is not yet known. We need to be prepared to adapt our regulatory framework to accommodate the outcome of that consultation. In any event, there are at least two areas where we can enhance the current model of regulation. We can work with the industry to increase the level of engagement between Dublin Airport, airlines and passengers when decisions that impact on these parties are made and explore how the voice of the passenger can be better heard in the consultation process. Again, CAR can learn from the experiences of other countries when dealing with these challenges.

Retaining the right people with the skills and experience necessary, together with enhancing those skills will be a significant challenge for CAR, particularly as competition for these skill sets increases across the domestic economy. We also recognise that as a small knowledge-based organisation, collaboration and information-sharing remains important to the successful achievement of our goals. This will require flexibility in our organisation structure and job roles in order to respond to the rapidly changing external environment in ways that remain effective and efficient.

We rely upon the expertise and knowledge of our staff to achieve our strategic goals and we need to sustain motivation and enhance our knowledge in order to be in a constant state of readiness to meet the challenges ahead.

Objective 1: Operate efficient and fit-for-purpose systems

- ❖ We will review our systems for issuing licences to Airlines, Groundhandlers, Tour Operators and Travel Agents to make sure that they remain up-to-date and represent best practice. In doing this we will look to other, similar agencies to draw from their experiences. In addition, we will look to imposing the minimum level of regulatory requirements necessary for applicants.
- ❖ We will benchmark ourselves against other agencies to ensure we are using best practice in enforcing passenger rights, promoting their rights and ensuring airline compliance.

Objective 2: Consult effectively with stakeholders

- ❖ Develop and implement a formal communications plan for each of the sectors we operate including Airlines, Groundhandlers, Airports, Travel Agents, Tour Operators and passenger representatives. Engage early and consult widely with stakeholders and operate a policy of “no surprises”. Develop a formal plan for regulatory compliance visits to licensed entities.
- ❖ Continue to engage with regulators and industry both nationally and internationally to improve our regulatory practice. Nationally, the Economic Regulatory Network is a

grouping of the key Irish economic regulators that was setup in response to the Government's initiatives on Better Regulation. This network shares best practice, which supports a more consistent regulatory approach.

- ❖ Continue to actively participate in the Thessaloniki Forum of European Airport Charges Regulators to promote best practices in the economic regulation of airports. To date the Commission has chaired the 2016 subgroup examining consultation and the weighted average cost of capital (WACC). European-level guidelines were published in December 2016.³
- ❖ Develop an approach to regulatory policy in preparation for our 2019 Dublin Airport Determination according to best international practice, in particular, concerning better passenger representation, transparency, flexibility, and constructive consultation between Dublin Airport and users.
- ❖ Keep up-to-date on developments and provide information to stakeholders in a timely manner.
- ❖ Publish a strategic plan for the period 2017 to 2019 setting out our goals for that period and the key areas of work on which we intend to focus.
- ❖ Review the structure and content of our main website and our consumer-focused website (flightright.ie) to ensure we provide stakeholders with information that is easy to access and understand.

Objective 3: Maintain a Skilled and Motivated Staff

- ❖ Align resource education and development plans with this strategic plan.
- ❖ Put in place a training plan for staff development based on an analysis of the skill and competency requirements of CAR. As part of this process, develop our knowledge further on the specific training requirements which apply in the Groundhandling area.
- ❖ Continue to use our Performance Management Development System to ensure best business practice together with facilitating individual and organisational education and development needs identification.
- ❖ Develop and implement a knowledge management system in order to retain and enhance our skill set appropriate to the needs of CAR.

³ <http://www.aviationreg.ie/news/thessaloniki-forum-on-airport-charges-recommendations-%e2%80%93-consultation-transparency-and-wacc.763.html>

9. Summary of Goals, Objectives and Actions

Efficient, High-Quality Airport Services

Objective 1	Actions
Set efficient charges at Dublin airport	<ul style="list-style-type: none"> ❖ Set a price cap for Dublin Airport for the next regulatory period 2020-2024. ❖ Regulate and monitor the cost-efficient provision of capital projects. ❖ Monitor the compliance of airport charges and the quality of service measures at Dublin Airport.
Objective 2	Actions
Increase stakeholder involvement in decision-making	<ul style="list-style-type: none"> ❖ Encourage increased level of consultation on charges and infrastructure. ❖ Examine how to better engage the passenger in the regulatory process.
Objective 3	Actions
Promote competition and facilitate new entry	<ul style="list-style-type: none"> ❖ Declare slot-coordination parameters at Dublin Airport to optimise the use of infrastructure, facilitating new airline entrants. ❖ Appoint an independent slot-coordinator. ❖ Enforce sanctions for airlines operating without a slot. ❖ Ensure fees charged to Groundhandlers are relevant, objective, transparent and non-discriminatory.

Safe and Financially Robust Airlines and Groundhandlers

Objective 1	Actions
Operate an efficient licensing system	<ul style="list-style-type: none"> ❖ Continue to be effective by keeping our systems and internal processes under review. ❖ Review timelines for responses, processes for licence issue, reviews, renewals, withdrawals or revocations. ❖ Further coordinate processes with the IAA in our respective roles of issuing licences to airlines and review our information-sharing arrangements

Financially Strong Tour Operators and Travel Agents

Objective 1	Actions
Implement requirements of the Package Travel Directive	<ul style="list-style-type: none"> ❖ Work closely with stakeholders to determine requirements. ❖ Identify options and implement necessary changes.
Objective 2	Actions
Provide adequate protection to travelling public	<ul style="list-style-type: none"> ❖ Review bonding and travel protection arrangements to ensure they remain effective. ❖ Investigate cases of alleged mistrading.

Robust Framework to Enforce Passenger Rights

Objective 1	Actions
Deal with passenger complaints effectively, efficiently and fairly	<ul style="list-style-type: none"> ❖ Investigate opportunities to reduce volume of queries that fall outside our remit
Objective 2	Actions
Increase travelling public's awareness of air passenger rights	<ul style="list-style-type: none"> ❖ Develop a communications plan, including a review of our websites, to increase awareness of passenger rights.

Regulation that Represents Best International Practice

Objective 1	Actions
Operate efficient systems	<ul style="list-style-type: none"> ❖ Review systems for licensing Airlines, Groundhandlers, Tour Operators and Travel Agents to ensure best practice. ❖ Benchmark ourselves against others to ensure best practice in enforcing and promoting passenger rights and airline compliance.
Objective 2	Actions
Consult effectively	<ul style="list-style-type: none"> ❖ Implement a communications plan to update stakeholders. ❖ Continue to engage with regulators and industry both nationally and internationally to improve regulatory practices. ❖ Actively participate in the Thessaloniki Forum of European Airport Charges Regulators.

	<ul style="list-style-type: none"> ❖ Develop regulatory policy in preparation for our 2019 Dublin Airport determination drawing from experience of other regulatory bodies. ❖ Keep up-to-date and provide information to stakeholders in a timely manner. ❖ Publish a strategic plan. ❖ Review and improve websites.
Objective 3	Actions
Maintain a skilled and motivated staff	<ul style="list-style-type: none"> ❖ Align resource education and development plans with this strategic plan. ❖ Put in place a training plan based on an analysis of the skill and competency requirements of CAR. ❖ Continue to use our Performance Management Development System to ensure best business practice. ❖ Develop and implement a knowledge-management system.

Appendix 1

Organisation Structure

