

Submission by Brian Rafferty Travelsavers Ireland.

Travelsavers Ireland is a subsidiary of Travelsavers International agent's consortium, which acts on behalf of over 3500 agencies worldwide. In Ireland we have 65 members. Our role as consortia is to negotiate on behalf of member agencies with suppliers of all types to increase the agent's income and profit. We play a major role in training and marketing for the agents, and supply technology free for their use.

We in Travelsavers would like to see the 4% bond requirement reduced as it is placing unnecessary pressure on a low profit business model. With the agency community over bonded by in excess of €120m euro pressure on cash resources is enormous. There is a complete imbalance in the market at present with 78% of the travelling public booking direct with suppliers and being unbonded, while 22% are considerably over bonded.

We would request of the commission to request from the department the following;

1. Reduce the bond requirement of agents to 1%, by increasing the fund available through the public protection fund.
2. Keep the existing licensing system in place, with an annual submission of accounts, these being the basis for licensable turnover.
3. Lodge 30% of the new government taxes in the Public Protection Fund, and develop a fighting fund to deal with supplier, tour operator and agency failure. Within four years there would be 120 million euro available.
4. Using the PPF place a bond requirement on all travel suppliers selling into the Irish market be they selling single elements or packages i.e. airlines, ferries, hotels, transport providers, accommodation, by any means of sale, particularly the internet.
5. Carriers must begin to carry some responsibility in the market, particularly when they charter. They must have an arrangement with CAR in this situation to bond the agent, CAR and the clients.
6. Enforcement should not be by Local Authorities but the local Authority could have a role in policing the market with enforcement being from CAR only. Local authorities are already overstretched and underfunded, and a burden like this will lead to fragmentation of policy and variations of enforcement as is the current situation with fire regulations enforcement.

We note the change by government during the process, by the introduction of the government departure tax. This tax should apply to all departures as it did in the past.

We thank you for this consultation process and remain.

Yours Sincerely,

---

Brian Rafferty  
Agency Sales and Service