



THE GLOBAL MAP OF AIR PASSENGER RIGHTS

Seven regulatory frameworks, one operating problem. A comparative reading of EU261, UK261, Canada's APPR, Turkey's SHY, Australia, the US DOT framework and Brazil's ANAC 400: what is in force, what is proposed, and what fragmented rights mean for legal and claims operations.

TABLE OF CONTENTS

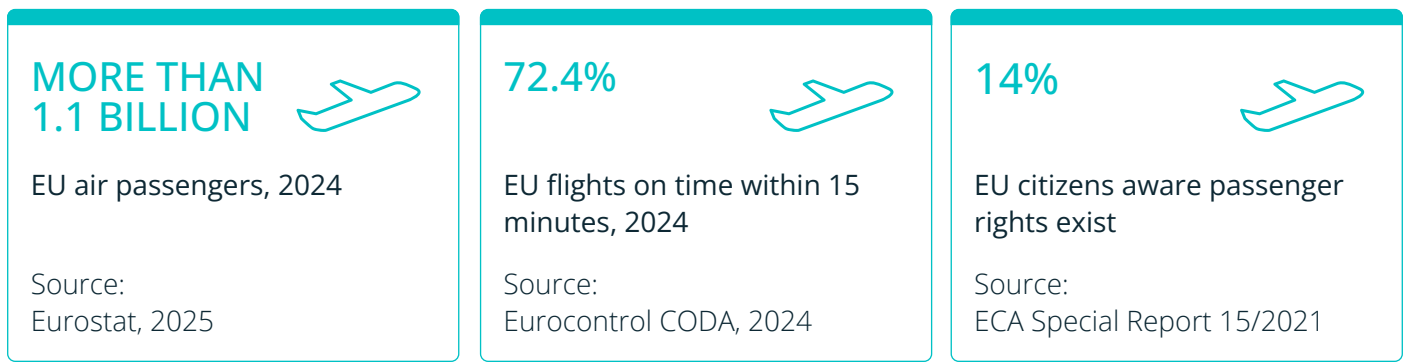
1	WHY THIS MATTERS NOW The spread of statutory rights, the scale of disruption, and low awareness as a shrinking buffer	p. 2
2	THE REGULATORY MAP The seven regimes compared, with current status clearly flagged	p. 4
3	JURISDICTION PROFILES Individual profiles of the seven jurisdictions, including scope, remedies and pending reforms	p. 5
4	DIRECTION OF TRAVEL Reform across the regimes, including the agreed EU261 revision	p. 7
5	THE OPERATIONAL REALITY Parallel obligations, repeated checks, and volume beyond manual handling	p. 9
6	OUTLOOK AND OPERATING MODEL An operating view of high-volume passenger claims	p. 10

1. WHY THIS MATTERS NOW

Three developments coincide. Statutory passenger rights are spreading to more countries. Filing a claim has become easier and largely digital. Specialised flight-compensation claims platforms (such as Flightright or AirHelp) and law firms file consumer claims at scale. Together these raise the volume of compensation demands that reach airlines.

THE SCALE, IN ATTRIBUTABLE TERMS

In 2024 the EU handled more than 1.1 billion air passengers [1]. European traffic reached roughly 10.7 million flights, about five percent above 2023, and 72 percent of flights arrived within fifteen minutes of schedule [2]. Awareness of passenger rights stays low: the European Court of Auditors reported that only 14 percent of EU citizens knew that air passenger rights exist [3]. Industry sources estimate the annual cost of Regulation 261 to airlines at around 8 billion euros, including care and assistance [4]. The claims company AirHelp estimated that some 287 million European passengers were affected by delays or cancellations in 2024 [5].



Cost and affected-passenger figures are interested-party estimates (IATA; AirHelp) and are labelled as such in the text and sources.

A EUROPEAN MODEL GOES GLOBAL

Regulation 261/2004 set the pattern: a defined disruption can give a fixed cash entitlement, and where the basic conditions are met the carrier bears the burden of proving an extraordinary-circumstances defence, including the direct causal link and the reasonable measures taken [6]. Other jurisdictions adapted it. The United Kingdom kept the rules after Brexit [7]. Turkey built a close parallel [8]. Canada created its own regime and has legislated to harden it [9]. Brazil mandates care and refunds, and routes monetary damages through the courts [10]. Australia is legislating a consumer charter and an ombuds scheme [11]. The United States requires automatic refunds, and withdrew a proposal for fixed compensation in late 2025 [12].

Selected indicators of financial and operational exposure — not directly comparable. Disruption costs land very differently across regimes — where disclosure is mandatory the figures are large; elsewhere only process metrics are public.

1. WHY THIS MATTERS NOW

WHAT THE SYSTEMS COST

EU €6BN+ Compensation owed, 2024 [13]	US \$4BN+ Refunds since 2021 [15]	Brazil \$200M Litigation cost, per year [16]
---	---	--

LOW AWARENESS IS A SHRINKING BUFFER

Low take-up has limited exposure so far. That buffer is shrinking. Claim platforms, mobile apps and bulk filing remove friction, and reform across several regimes is designed to make payment more automatic. As filing approaches zero effort, the constraint moves to the carrier's ability to respond accurately in each jurisdiction. Once the revised regulation becomes applicable, airlines will generally have to inform potentially eligible passengers electronically within 96 hours after arrival, explain their rights and provide clear instructions on how to submit a compensation claim.

A single disruption can create obligations under several regimes at once: different triggers, different deadlines, different evidence, each assessed separately. A delayed Istanbul to London service may engage SHY in Turkey and, depending on the operating carrier, UK261 in Britain. A cancelled Toronto to São Paulo flight can engage Canada's APPR and Brazil's ANAC 400.

The EU and Brazil figures are interested-party or industry estimates. The US figure is based on information published by the US Department of Transportation. The figures are not directly comparable.



2. THE REGULATORY MAP

The seven regimes share common roots and differ on the variables that drive cost and dispute: the trigger, the amount, the time limit, and the evidence each side must produce.

IN FORCE (current law)

PROPOSED (not yet adopted)

PENDING (reform drafted, not in force)

WITHDRAWN (proposal dropped)

Regime & status	Compensation trigger	Fixed cash compensation	Care / assistance	Claim deadline	Burden of proof
EU261 — IN FORCE ; reform adopted (Parliament 7 Jul 2026; Council 13 Jul 2026) (Reg. (EC) 261/2004)	Arrival delay 3h or more, cancellation, denied boarding	€250 / €400 / €600 by distance band	Meals, communication, accommodation; refund or re-routing	National limits, varies (about 1 to 6 years)	Carrier proves extraordinary circumstances
UK261 IN FORCE (Retained EU law)	Delay 3h or more, cancellation, denied boarding	£220 / £350 / £520; long-haul over 3,500 km reduced	Mirrors EU261 duty of care	6 years; 5 years in Scotland	Carrier proves extraordinary circumstances
Canada APPR IN FORCE REFORM PENDING (SOR/2019-150)	Arrival delay 3h or more within the carrier's control and not required for safety	Large CA\$400 / 700 / 1,000; small CA\$125 / 250 / 500	Food, drink, communication, lodging; rebooking	1 year to the airline	Today cause-tiered; statute moves it to carrier
Türkiye SHY IN FORCE (SHY-Yolcu)	Delay 3h or more, cancellation, denied boarding	€100 domestic; €250 / €400 / €600 intl, paid in TRY	Communication, meals, accommodation, transfer	No specific deadline in SHY; general Turkish limitation rules may apply	Carrier proves extraordinary circumstances
Australia PROPOSED (Charter + ombuds)	Conduct and refund standards; no fixed delay payout	None fixed; refund and consumer-law remedies	Charter service standards (in draft)	Via ombuds scheme (to be set)	Conduct-based
US DOT REFUND IN FORCE COMP. WITHDRAWN (14 CFR 260 / 399)	Cancellation or significant change; passenger declines	None fixed; automatic cash refunds mandatory	Not fixed federally	Refund processing (not a claim-filing deadline): 7 business days (card) / 20 calendar days (other)	Rule-defined significant-change test
Brazil ANAC 400 IN FORCE (Res. 400/2016)	Care tiers at 1h / 2h / 4h; remedy choice at 4h or more	No fixed compensation tariff for delays or cancellations; material and moral damages via courts	Communication 1h, food 2h, accommodation where an overnight stay is necessary plus transport from 4h	Domestic 5 yrs; intl 2 yrs material, 5 yrs moral	Regulatory care/refund duties (ANAC 400); damages via courts under consumer law and, for international carriage, the Montreal Convention

Cost and affected-passenger figures are interested-party estimates (IATA; AirHelp) and are labelled as such in the text and sources.

THREE FAMILIES OF REGIME

Prescriptive-tariff systems (EU261, UK261, Turkey SHY, Canada APPR) pay fixed sums on defined triggers. Care-and-courts systems (Brazil ANAC 400) mandate assistance and refunds, and leave monetary compensation to litigation. The US DOT framework guarantees automatic refunds in defined circumstances; Australia's proposed framework would add service and redress standards. Neither sets fixed delay compensation.

3. JURISDICTION PROFILES

EUROPEAN UNION

IN FORCE

Regulation (EC) 261/2004

The benchmark regime. Fixed compensation of €250 to €600 by distance for delays of three hours or more, cancellations and denied boarding, with a duty of care owed regardless of cause [6]. The three-hour delay trigger comes from CJEU case law [18]. The carrier must prove any extraordinary-circumstances defence. No EU-wide time limit applies; national limits govern [19]. Reform agreed in conciliation on 15 June 2026 and confirmed by the European Parliament in plenary on 7 July 2026 (646 votes to 12, three abstentions): the three-hour trigger and the €250–€600 amounts stay, for journeys within the €600 compensation band, the amount may be reduced by 50% where the passenger reaches the final destination no more than four hours after the scheduled arrival time, whether following rerouting or on the originally booked journey, and the deal adds a non-exhaustive list of extraordinary circumstances, a nine-month filing window for passengers and a 30-day deadline for airlines to pay or contest claims [20]. The Council gave final clearance on 13 July 2026; the regulation enters into force 20 days after publication in the Official Journal and applies 12 months after entry into force [21].

UNITED KINGDOM

IN FORCE

UK261, retained EU law

A close copy of EU261, paid in sterling at £220, £350 and £520 (long-haul over 3,500 km: £260 for a 3–4 hour arrival delay, £520 beyond four hours), and enforced by the Civil Aviation Authority [7]. The claim window is six years, and five years in Scotland [22]. The Civil Aviation (Consumer Protection and Regulatory Reform) Bill completed its third reading in the House of Lords on 20 July 2026 and was subsequently sent to the House of Commons, where it remains under consideration [30].

CANADA

IN FORCE

Air Passenger Protection Regulations

Under the current APPR, obligations are tiered according to the cause of the disruption. Large-carrier compensation amounts are CA\$400, CA\$700 and CA\$1,000 depending on the length of the delay; small-carrier amounts range from CA\$125 to CA\$500 [9]. The fixed sums apply only to disruptions within the carrier's control and not required for safety; for delays and cancellations, the applicable advance-notice condition also applies. Passengers have one year to claim, and the airline has thirty days to respond. Reform: the statute moves toward compensation owed unless exceptional circumstances apply, with higher penalties; regulations pending.

3. JURISDICTION PROFILES

TURKEY

IN FORCE

SHY-Yolcu

In force since 2012, drafted in parallel with EU261, and amended in December 2024 [8]. It covers departures from Turkey and Turkish-carrier arrivals. Compensation runs from €100 for domestic flights to €600 for long-haul international flights, with the amounts set in euros and paid in Turkish lira at the applicable Central Bank exchange rate on the ticket-purchase date [33]. The regulation sets no specific claim deadline; general Turkish limitation rules may apply (commonly cited as about two years).

AUSTRALIA

PROPOSED

consumer charter and ombuds

The 2024 Aviation White Paper committed to an aviation ombuds scheme and a consumer charter [11]. The Aviation Consumer Protection Bill 2026 was introduced on 1 April 2026, passed the House of Representatives on 29 June 2026 and remains before the Senate as of 6 August 2026 [23]. Interim arrangements apply pending the statutory scheme. The model is refund and consumer-law based, with no fixed delay compensation.

UNITED STATES

REFUND IN FORCE

DOT, 14 CFR

The 2024 final rule requires automatic cash refunds, in the original payment method, for cancelled or significantly changed flights [12]. A separate proposal for fixed cash compensation and care for airline-caused disruptions was withdrawn in November 2025 [24]. The US has no EU-style delay compensation in force.

BRAZIL

IN FORCE

ANAC Resolution 400/2016

Brazil mandates escalating care: communication after one hour, food after two hours, and accommodation, where an overnight stay is necessary, plus transport after four hours. After a delay of four hours or more, the passenger chooses a refund, re-routing or rebooking, and refunds run within seven days [10]. Resolution 400 sets no fixed compensation tariff for delays or cancellations. Material and moral damages are pursued through the courts. For international carriage, material-damage claims are generally subject to the Montreal Convention's two-year period; domestic claims and the treatment and limitation of moral-damage claims fall under Brazilian law and should be assessed separately [25].

4. DIRECTION OF TRAVEL

The reforms point in a consistent direction: clearer or broader entitlements, stronger enforcement, more automatic payment, and a larger role for alternative dispute resolution and ombuds channels.

REFORM TIMELINE

- **2024, Apr** US DOT finalises the automatic refund rule [12].
- **2024, Aug** Australia's Aviation White Paper commits to an ombuds scheme and a consumer charter [11].
- **2024, Dec** Canada pre-publishes APPR amendments for consultation.

US DOT issues an ANPRM on fixed compensation [24].
- **2025, Jun** EU Council sets its first-reading position, proposing 4h short-haul and 6h long-haul thresholds and €300 to €500 [27].
- **2025, Nov** US DOT withdraws the fixed-compensation proposal [24].
- **2025, Dec** EU trilogue talks fail to reach agreement.
- **2026, Jan** European Parliament adopts its second-reading position, keeping the three-hour rule [28].
- **2026, Jun** On 15 June 2026 the EU conciliation committee agreed the revised regulation: the three-hour trigger and €250–€600 amounts stay, with a standardised list of extraordinary circumstances and faster claim handling. The joint text was later adopted by both institutions [29].
- **2026, Jul** The UK Civil Aviation (Consumer Protection and Regulatory Reform) Bill completed its third reading in the House of Lords on 20 July 2026 and was sent to the House of Commons for further consideration [30].

On 7 July 2026 the European Parliament confirms the agreement in plenary, 646 votes to 12 with three abstentions; the Council gave final clearance on 13 July 2026 [20][21].

4. DIRECTION OF TRAVEL

FOUR CONVERGING VECTORS

Clearer, broader entitlements. Canada's reform, the US refund rule and Australia's charter extend or clarify rights, including in markets that had little before.

Stronger enforcement. The UK Bill would give the CAA direct fining powers. The Canadian government announced legislation to permit penalties of up to CA\$1 million for systemic violations of the APPR. Stronger enforcement. The UK Bill would give the CAA direct fining powers, the Canadian government announced legislation to permit penalties of up to CA\$1 million for systemic violations of the APPR, and the US has enforced its refund rule actively.

More automatic payment. US automatic refunds, Canada's move to presumed liability, and the Parliament's proposed pre-filled claim forms all reduce the passenger's need to ask.

ADR and ombuds growth. The UK intends mandatory ADR and Australia is building an ombuds scheme, both lower-friction channels that raise claim throughput.

Once the revised regulation becomes applicable, airlines will generally have to inform potentially eligible passengers electronically within 96 hours after arrival, explain their rights and provide clear instructions on how to submit a compensation claim. The agreement adds a nonexhaustive list of extraordinary circumstances, electronic claim acknowledgement, and a 30-day deadline for airlines to pay or contest a claim, alongside a nine-month window for passengers to file one. The European Parliament confirmed the agreement in plenary on 7 July 2026, and the Council gave final clearance on 13 July 2026 [21]; the regulation enters into force 20 days after publication in the Official Journal and applies 12 months after entry into force, so it is not yet in application.

5. THE OPERATIONAL REALITY

Regulation is written one regime at a time. Disruption ignores those boundaries. A single irregular-operations day can generate claims across several regimes at once, each with its own admissibility test, its own evidence pack and its own clock. The pressure comes from volume, deadlines, evidence and repeated assessment, not from legal complexity alone.

THE SAME EVENT, ASSESSED FOUR DIFFERENT WAYS

EU261 / UK261	Türkiye SHY	Canada APPR	Brazil ANAC 400
trigger 3h+ delay, prove extraordinary circumstances, clock EU varies / UK 6 years, fixed tariff.	trigger 3h+ delay, prove extraordinary circumstances, no specific SHY deadline; limitation under Turkish law, paid in TRY.	trigger 3h+ within carrier control, classify the cause, clock 1 year, CA\$ tiered by delay.	tiered care 1h / 2h / 4h, damages via courts, clock 2 to 5 years, refund in 7 days.



6. OUTLOOK AND OPERATING MODEL

The matrix restates the regimes as an operating problem. For each, it sets out what triggers a claim, the evidence that supports or defends it, the deadline that governs it, the decision logic, the operational risk, and where automation is needed.

Regime	Trigger	Evidence required	Deadline / clock	Decision logic	Operational risk	Automation need
EU261 / UK261 (in force)	Arrival delay 3h+, cancellation, denied boarding	Flight times, cause records, weather and ATC logs, notice given	EU national limits; UK 6 yrs, 5 in Scotland	Distance band sets amount; carrier proves exemption	Bulk aggregator claims; strict CJEU exemptions	High: band calc, evidence retrieval
Turkey SHY (in force)	Delay 3h+, cancellation, denied boarding	Flight data, cause, FX rate on ticket-purchase date	No specific deadline; general Turkish limitation rules	Distance band in EUR, paid in TRY at the applicable Central Bank rate on the ticket-purchase date [33]	Currency conversion timing disputes	High: FX handling, band calc
Canada APPR (in force, reform pending)	Arrival delay 3h+ within the carrier's control and not required for safety	Cause classification, delay length, treatment provided	1 yr to airline; 30-day response	Cause category sets tier (CA\$400 / 700 / 1,000)	Reform shifts burden to carrier	High: cause logic, response SLA
US DOT (refund in force)	Cancellation or significant change; passenger declines	Schedule change vs booking, payment method	Refund processing (not a claim-filing deadline): 7 business days (card) / 20 calendar days (other)	Significant-change test; refund in original form	Automatic-refund SLA; active enforcement	High: detect and issue refund
Brazil ANAC 400 (in force)	Care tiers 1h / 2h / 4h; remedy choice at 4h+	Records of care given; damage proof for court	Refund processing 7 days (not a filing deadline); court damages 2 to 5 yrs	Care duties by tier; damages decided by courts	High-volume individual litigation	High: care tracking, case mgmt
Australia (proposed)	Conduct and refund standards, once in force	Service standards met, refund eligibility	Via ombuds scheme, to be set	Consumer-law remedies; no fixed tariff	New ombuds complaints channel	Medium: intake, refund tracking

Cost and affected-passenger figures are interested-party estimates (IATA; AirHelp) and are labelled as such in the text and sources.

WHAT THE MATRIX SHOWS

The work that scales badly is the same in every regime: classify the event, retrieve the right evidence, apply the jurisdiction's decision logic, and act before the clock expires. These steps repeat thousands of times per disruption and across every market a carrier serves.

FROM FRAGMENTED RIGHTS TO A CONTROLLED PROCESS

Passenger rights are becoming operationally fragmented. Claims are becoming easier to file. Deadlines are becoming harder to miss. Evidence must be assembled faster. Manual handling does not scale with claim volume. Airlines need a controlled processing layer for high-volume passenger claims.

JUNE is built for high-volume legal processes. It helps airline legal and claims teams structure intake, apply jurisdiction-specific decision logic, manage evidence, control deadlines, collaborate with internal and external teams, and keep visibility across thousands of parallel claims. JUNE supports, structures, automates and orchestrates the work. It does not replace legal judgement.

SOURCES & NOTES

1. Eurostat, "Number of air passengers up 8% in 2024", 8 December 2025. <https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20251208-1> (reproduced in: EPRS briefing, "Revising air passenger rights: where do we stand?", 17 January 2026.)
2. Eurocontrol, Forecast 2024-2030 (Autumn 2024) and CODA Digest, Annual 2024 (25 July 2025).
3. European Court of Auditors, Special Report 15/2021: 14 percent of EU citizens aware air passenger rights exist.
4. IATA statements on EU261 reform, November 2025: about €8 billion annual cost (interested-party estimate).
5. AirHelp estimate, 2024: about 287 million European passengers affected (interested-party estimate).
6. Regulation (EC) No 261/2004, EUR-Lex CELEX 32004R0261.
7. Retained Regulation 261/2004 (UK), Art. 7 as amended by SI 2019/278.
8. Turkey DGCA (SHGM), SHY-Yolcu Regulation (in force 1 January 2012; amended 10 December 2024).
9. Canadian Transportation Agency, APPR Highlights.
10. ANAC Resolution No. 400/2016; ANAC passenger guidance.
11. Australian Government, Aviation White Paper, 26 August 2024.
12. U.S. Department of Transportation, "Refunds and Other Consumer Protections", Final Rule, 89 Federal Register 32760, 6 May 2024, 14 CFR Parts 260, 262 and 399. www.transportation.gov/regulations/federal-register-documents/2024-07177
13. AirHelp / Aerotime, 2024: EU261 compensation owed of more than €6 billion; c. 218,000 eligible flights; c. one third of eligible passengers file (interested-party estimate).
14. Canadian Transportation Agency / CBC, 2024: airlines ordered to compensate or refund in c. 50% of resolved cases; complaint backlog.
15. US DOT: c. US\$4 billion in refunds returned to passengers since 2021.
16. Aviation Week: Brazil aviation litigation costs airlines c. US\$200 million a year.
17. UK CAA passenger complaints data / AviationADR: per-airline complaints and ADR uphold rates; no aggregate compensation total published.
18. CJEU, Sturgeon (C-402/07, 2009) and Nelson (C-581/10, 2012): three-hour delay rule.
19. CJEU, Moré v KLM (C-139/11, 2012): national limitation periods apply.
20. European Parliament, press release, „European Parliament achieves upgrade to air passenger rights“, 7 July 2026 (plenary confirmation, 646-12-3); joint text PE-CONS 39/1/26 REV 1 (procedure 2013/0072(COD)).
21. Council of the EU, press release, "Council gives final clearance for stronger air passenger rights", 13 July 2026.
22. UK CAA passenger guidance; Dawson v Thomson Airways [2014] EWCA Civ 845.
23. Parliament of Australia, Aviation Consumer Protection Bill 2026, introduced on 1 April 2026, passed by the House of Representatives on 29 June 2026 and before the Senate as of 6 August 2026. www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bld=r7469
24. US DOT ANPRM, Airline Passenger Rights, 11 December 2024, and its Withdrawal, effective 17 November 2025.
25. STF Tema 210 (ARE 766.618): Montreal Convention prevails for material damages on international carriage.
26. Canada Gazette, Part I, 21 December 2024: proposed APPR amendments (consultation closed 6 March 2025).
27. Council of the EU, first-reading position, press release, 5 June 2025.
28. European Parliament, second-reading position, 21 January 2026.
29. Council of the EU, press release, "Council and Parliament reach landmark agreement on stronger EU air passenger rights", 15 June 2026; joint text PE-CONS 39/1/26 REV 1.
30. UK Parliament, Civil Aviation (Consumer Protection and Regulatory Reform) Bill [HL], third reading in the House of Lords on 20 July 2026; subsequently sent to the House of Commons. bills.parliament.uk/bills/4125
31. Canada Transportation Act as amended by the Budget Implementation Act, 2023 (Bill C-47).
32. Turkish Civil Aviation Act (TSHK), Article 131, and the Montreal Convention, Article 35. The applicable limitation period must be assessed according to the legal basis and type of carriage.
33. Directorate General of Civil Aviation of Türkiye (SHGM), Regulation on Air Passenger Rights (SHY-Yolcu), Article 8, including the amendment published on 10 December 2024. web.shgm.gov.tr/doc4/shy-passenger.pdf