

Briefing note:
to inform decision about the Code of Conduct on reviews for accommodation

1. Introduction

The purpose of this document is to gather input from HOTREC members on HOTREC's endorsement of the Code of Conduct for Online Ratings and Reviews for Tourism Accommodation (referred here as 'the code'). To facilitate this, we present an overview of the key issues stemming from the code and risks and benefits of two options in the table below.

The Code is annexed to this note.

NB: The scope is limited to accommodation. The European Commission has no intention to extend it to food services.

Option		Benefits	Risks
Option 1	HOTREC endorses/signs the code with the objective to continue pushing to improve the situation around reviews	<p>Political benefit vis-à-vis European Commission including Commissioner Tzitzikostas who supports this code.</p> <p>The 'stakeholder network' under the code creates a zone of exchanges for HOTREC to raise issues with online platforms during annual meetings.</p>	<p>Perception that HOTREC agrees with all principles and concepts, potentially leading to misalignment with members who do not support all aspects of the code.</p> <p>Potential dependency on the code's framework, limiting flexibility to address issues outside of the annual meetings of the 'Stakeholder network'.</p>
Option 2	HOTREC does not endorse/sign the code	<p>Express our view that as it is, we don't believe this code is going to help our businesses.</p> <p>Continue to raise the issue in our terms in other fora, e.g. public events, by commissioning a study on reviews, upcoming Digital Fairness Act.</p>	<p>Political risk of being seen as non-cooperative or resistant to collaboration efforts, potentially weakening relationships with the European Commission.</p> <p>Risk of missing out on potential benefits and influence within the stakeholder network created by the code.</p>

2. Background

In February 2024, the European Commission (DG GROW (now MOVE), Tourism Unit) launched the work on a Code of Conduct for online ratings and reviews for tourism accommodation. The objective was to foster collaboration among key stakeholders and gain support for a Code of

Conduct focusing online reviews in accommodation. The project was awarded to the Verian consortium (referred to as consultants throughout this document).

HOTREC provided feedback at multiple stages of the project (see more [here](#)):

- In June 2024, HOTREC responded to a survey and provided feedback to the initial draft. HOTREC organised an online meeting with HOTREC members to better understand their concerns.
- In October 2024, HOTREC attended a dedicated workshop hosted by the European Commission with consultants to discuss issues raised during the consultation process.
- In December 2024, HOTREC shared with the European Commission its concerns and criticism of the new version of the code due to unbalanced and unrealistic commitments.
- On 1 April 2025, HOTREC raised again concerns linked to the concept of 'staying guests', the process to flag contested reviews, the concept of 'incentivised reviews' with the European Commission, consultants, BEUC and EUTravelTech .
- Final rounds of meetings with the European Commission, consultants and EUTravelTech took place in June 2025. HOTREC regularly informed its members of the progress and sought their feedback.

3. What would be the implications of signing the code?

If HOTREC was to sign the code, according to principle 2.2 of the code, we would commit to promoting the code and its principles among our members as well as raising awareness of the code more broadly. National associations and hotels could decide whether to join the code or not. While codes of conduct are non-binding and voluntary, HOTREC would insist on ensuring the code does not lead to any legal obligations or liability for businesses.

To note that from the platform side, the same principle applies: EUTravel Tech as well as individual platforms are invited to endorse the code.

4. Remaining issues in the code

Although certain parts of the code show improvement, such as section 4, which outlines principles supported by online travel agents, platforms, and meta-search engines hosting first-party reviews, there are still outstanding issues listed below on which we raised our opposition. We recommend reviewing the entire code to identify any other potential concerns.

a. 'Staying Guest'

The current wording is a compromise found during the last meeting with the European Commission, EUTravelTech and consultants. At this stage it seems unlikely that a strict separation between booking experience on the platform and actual experience at the accommodation is a viable and acceptable compromise:

- 1. Introduction - This **Code of Conduct for Online Ratings and Reviews for Tourism Accommodation** aims to achieve greater transparency and reliability of online reviews for consumers and businesses in the tourism and accommodation sector. The Code shall enable greater cooperation and cohesion in the tourism accommodation industry's digital space, improving practices around ensuring the authenticity of reviews, **from guests who have had an experience with the accommodation.**

- **5.2 Cooperation with platforms:** *Collaborate with platforms to flag fake reviews where appropriate, while recognising that consumers who attempted to book - or booked but ultimately did not stay for whatever reason - **may have legitimate reason to share their actual experience with the accommodation provider in a review, which should not be considered a fake review.***

b. Contested reviews

The previous version of the code included a possibility to remove reviews contested by accommodation providers. This option was removed due to EUTravelTech and European Commission's opposition. The latter argues that removal/flagging of contested reviews could be perceived as censorship:

- **4.12 Dispute resolution:** *Set reasonable timeframes for the handling and removing of disputed reviews to ensure a prompt and transparent conflict resolution. The Stakeholder Network can provide further guidance on what these timeframes would entail, considering different business models.*

c. Incentivised Reviews

While accommodation providers should refrain from disproportionate or conditions incentives (i.e. please leave positive review and you will receive one night for free) this does not apply to other incentivised reviews (i.e. encouraging guests to leave a review on a free drink voucher):

- **5.3 Incentivised reviews:** *Refrain from using disproportionate or conditional incentives to entice guests to leave biased reviews, as these can unduly skew the ratings. Signatories representing accommodation providers commit to actively inform their members about the detrimental nature of disproportionate and conditional incentives.*

d. Accommodation providers that host reviews

According to the code, certain principles that apply to online platforms hosting reviews would also apply to hotels that host reviews, such as:

- Management of fake, misleading and harmful reviews (from 4.1 to 4.4)
- Communicate about processes in place to tackle fake reviews (4.7)
- Verification of review origin (4.8)
- Transparency in cases of pseudonymisation (4.9)
- Flagging fake, policy-violating and illegal reviews (4.10)
- Relevance of reviews and ratings (4.13, 4.14)

See previous exchange and information on this workstream on HOTREC legislative tracker [here](#).