

EXECUTIVE SUMMARIES – JUNE 2025

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Distribution

The working group took place on 10 April 2025. Documents are available [here](#) The next working group is on 20 November 2025.

Digital Markets Act – Booking.com

[Background documents](#) on the extranet

As of 14 November 2024, **Booking.com** is obliged to comply with the obligations of the Digital Markets Act. HOTREC issued a [press release](#). On 25 November 2024, HOTREC attended a compliance workshop during which Booking.com presented their compliance solutions and stakeholders were allowed to ask questions. The hotel industry was united in challenging Booking.com's compliance solution.

On 29 January 2025, MEP Andreas Schwab hosted a [breakfast event on the DMA](#) during which HOTREC and its members presented their views and concerns to Members of the European Parliament. HOTREC and its members also met with Dragoş Tudorache, cabinet member of Stéphane Séjourné (Executive Vice-President of the European Commission for Prosperity and Industrial Strategy) and Werner Steng, cabinet member of Henna Virkkunen (Executive Vice-president of the European Commission for Technological Sovereignty, Security). As a part of the compliance information sharing, HOTREC also organised a session for the European Commission with a Brussels based hotel. The session focused on explaining how Booking.com system works in practice. HOTREC prepared [a compliance paper](#) on price parity clauses and shared it with the European Commission. HOTREC also met with cabinet members of executive Vice-President Teresa Ribera who is in charge of the DMA.

In June 2025, HOTREC presented its views on Booking.com's compliance during Internal Market Committee's Working Group on the Implementation of the DMA. Booking.com presented their compliance measures which remained largely unchanged from November 2024. The European Commission was in attendance and provided some thoughts however refrained from evaluating the compliance measures.

HOTREC remains in contact with likeminded stakeholders, including European Hotel Forum and Airlines for Europe. We are also in contact with European Consumer Organisation (BEUC) who shares our views on parity clauses. HOTREC is assisted by consultancy Forward Global who provides legal and strategic advice.

Timeline:

- Q2-Q3 2025 – More information on European Commission's views on Booking.com's compliance.

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At the beginning of September 2023, **Alphabet (i.e. Google)** was designated as a gatekeeper platform under the Digital Markets Act. One of their services, Google Search will be required to comply with the obligations envisaged in the law including on the prohibition of self-preferencing. The product would negatively impact hotels, especially SMEs and favour OTAs. The position on the new search page would be even more dependent on the advertising expenses and could push small independent hotels even further down the order of results.

On 19 March 2025, the European Commission sent preliminary findings to Google concerning their compliance with Article 6.5 of the Digital Markets Act. The Google Search changes were found non-complaint. You can find more information [here](#).

On 25 June 2025, HOTREC will meet the DMA Task Force together with the European Hotel Forum and Airlines for Europe. The meeting was coordinated on the initiative of HOTREC. The European Commission is also organising next set of compliance workshops including one focused on Alphabet. While the workshop will not cover self-preferencing, an additional stakeholder meeting is scheduled on 8 July 2025 to cover the issue at the beginning of July. Google shared new mock-ups with HOTREC. According to preliminary analysis, the proposal cannot be endorsed.

Timeline

- TBC – Possible fine for Google.

Restaurants & late-nights

The last working group was held on 13 March 2025 with a focus on late night establishments. Slides and documentation are available [here](#). The next working group will be held in Brussels on 24 September followed by a lunch event in the European Parliament on the future of restaurants.

Packaging & Packaging Waste Regulation (PPWR)

[Latest briefing](#) on the extranet

Since the PPWR entered into force on 11 February 2025 (text available [here](#)), HOTREC has been closely monitoring implementation. The European Commission is expected to publish detailed Q&A by the end of July 2025. However, specific guidelines on implementing the bans on single use packaging in Horeca, as mandated by law, are not expected before February 2027. HOTREC is awaiting selection to the European Commission's expert group on waste who will help draft these guidelines documents.

On reuse and refill, HOTREC, in collaboration with Serving Europe (association of QSR), is involved in drafting guidelines for hospitality. It will help operators comply with obligations arising from Article 32 and 33 and are expected to be finalised by August 2025. The aim is then to promote these guidelines to the European Commission and at national level.

Regarding restrictions to miniature cosmetics in hotels, HOTREC has submitted a parliamentary question to Irish MEP Sean Kelly seeking clarification from the European Commission on whether single toiletry kits could be made available at reception.

Timeline:

- Q3 2025 – Work on secondary legislation and guidelines begins.
- 2027 – Refill obligations take effect.
- 2028 – Targets for reusable packaging in takeaway are introduced.
- 2030 – Ban on single-use plastics in hospitality, alongside the introduction of reuse targets for beverages and the ban on miniature cosmetics.

Food waste reduction[Latest briefing](#) on the extranet

The revision of the Waste Framework Directive adopted in June 2025 establishes **food waste reduction targets for restaurants**: minus 30% per capita reduction in food services including restaurants by 2030.

HOTREC was successful in obtaining flexibility regarding the baseline year, voluntary food donation and the introduction of a tourism correction factor in measurements. Now it will be up to each member state to develop national measures to meet the targets.

A review of the food waste reduction targets as mandated by law is foreseen in 2027. We believe our focus should now be on lobbying in favour of separating edible and non-edible food waste in measurements. In Sweden in 2024, only 25% of the food wasted in hotels and restaurants was edible (unlike 100% in retail).

HOTREC supports the renewal of the mandate for 2027-2031 of the EU Platform on Food Losses and Food Waste. We believe we should continue to share best practices and initiatives showcasing hospitality establishments successfully tackling food waste a local level.

Timeline:

- Q4 2025 – Entry into force (TBC).
- 2026 – Application of the Directive (TBC).
- 2027 – Renewal of the mandate of the EU's Platform on Food Losses and Food Waste.

STR and the collaborative economy

The working group took place on 6 March 2025. Documents are available [here](#). The next working group is on 25 September 2025.

Next Steps on Short Term Rentals

The previous European Commission made important steps forward on regulating short term rentals. Firstly, EU policy makers adopted the [Regulation on Short Term Accommodation Rental Services](#) which sets common rules for host registration and a data sharing framework with public authorities. While voluntary, the member states have until May 2026 to implement the Regulation. Secondly, EU member states adopted a [VAT in Digital Age Package](#), which requires STR platforms to collect and remit VAT to tax authorities. The member states have until 2030 to implement the provision on STR platforms however we are seeking clarification on exact timeline (i.e. if member states start the system earlier).

The new Commissioner for Energy and Housing Dan Jørgensen was tasked to prepare further initiatives on STRs (timeline TBC), especially in connection to housing. The upcoming EU Tourism Strategy (see above) might also offer an opportunity to address this issue further. There is a renewed interest overtourism and housing, especially with the European Parliament's [committee on the housing crisis](#), tasked with preparing a report.

In February 2025, HOTREC prepared a strategy for levelling the playing field between traditional accommodation providers and STRs, available [here](#).

On 4 June 2025, HOTREC submitted [a response to the call for evidence](#) on European affordable housing plan and met with cabinet of Commissioner for Energy and Housing to discuss next steps. The

Commission continues to explore possible gaps on STRs. HOTREC also met with European cities representatives to exchange views on the topic.

Timeline:

- TBC – Initiative(s) on housing and STR.

Sustainability

The last working group took place on 2 October 2024. All relevant documents of the last working group are available [here](#).

Green Claims

[Latest briefing](#) in the extranet

On 23 March 2023, the European Commission presented its proposal for a Directive on Green Claims ([COM\(2023\)166 final](#)). The aim is to propose common criteria against greenwashing and misleading environmental claims. On 14 February 2024, the European Parliament confirmed the vote of the LIBE committee ([consolidated report](#)) during its plenary session. The Council reached its [general approach](#) on 17 June 2024.

Ahead of the last trilogue taking place on 23 June, the EPP sent a letter to Commissioner Roswall, asking for the withdrawal, as the compromise is still too bureaucratic for companies. ECR supported this decision.

HOTREC, together with Independent Retail Europe, Euro coop and Rural Tourism issued a [joint letter](#) for no compromise to be reached at the trilogue. The administrative burden and cost would make it unfeasible for companies to comply.

On Friday, 20 June, and ahead of what was supposed to be the last trilogue negotiation, the European Commission communicated to the press **that it was going to withdraw the proposal**.

This constitutes **a major achievement by HOTREC**, who had been in close contact lately with the EPP and ECR and trying to find the best strategy possible for this outcome to be reached.

Social Affairs/SSD

The Social Affairs working group took place on 18 March 2025. All documents and main outcome are available [here](#). The working group meeting of the Sectoral Social Dialogue took place on 25 March 2025. All documents are available [here](#).

Subcontracting

The European Parliament is working on an own initiative report focusing on Subcontracting. The rapporteur will be MEP Danielsson (S&D/Sweden). The report is scheduled to be issued mid-July.

It is to note that EFFAT, our trade union counter-part, issued a [position paper](#) on subcontracting. Amongst other points it asks for subcontracting to be banned for companies primary functions and asks for joint liability of actors, when subcontracting.

HOTREC is consulting members to finalise a position paper on the topic. Our main priorities are the following:

- Companies in the hospitality sector **must be free to decide how to organise their services**.

- A **full chain liability is not proportionate**. National legislation already exists to protect the interests of workers and businesses.
- **No legislation is needed on subcontracting at EU level.**
- To avoid any possible abuse, solutions are found through **enforcing current legislation and encouraging labour inspections.**

After the Parliament issues its report, the Commission is obliged to take action. It is often the case, that legislation is proposed by the Commission.

Timeline:

- July 2025 – HOTREC to publish its position paper
- Mid-July 2025 – the MEP to publish its draft own initiative report

Quality Jobs Roadmap

[Latest briefing on the extranet](#)

The European Commission is in the process of consulting social partners on the Quality Jobs Roadmap initiative. To build on the strategy, a meeting with Vice-President Minzatu took place in April, followed by a hearing. The Roadmap will support fair wages, good working conditions, training and fair job transitions for workers and self-employed people.

During the consultation meetings and in its written contribution HOTREC highlighted that a competitive and innovative environment business environment will lead to quality jobs. Overall, we **consider that the initiative should take a non-legislative approach** and believe that the implementation of the current legislation should be reinforced. Soft instruments, such as guidelines on how to implement legislation; artificial intelligence tools and the involvement of social partners are welcome.

We call on the EU to support the sector in **improving its image**, promote **different types of work; simplify existing legislation** (e.g. Pay Transparency and Transparent and Predictable Working conditions).

Timeline:

- Q4 2025 – European Commission to present the strategy.

Ad Hoc issues

Package Travel Directive (PTD)

[Latest news](#) on the extranet

At the time of writing, HOTREC has seen the European Parliament's final report likely to be adopted on 26 June. The rapporteur MEP Saliba suggests **leaving the limitation of prepayments to the discretion of member states**, but HOTREC advocates for deleting this measure in trilogue.

While the removal of the 3-hour definition is good news, **HOTREC argues that the remaining of the 24-hour definition should be deleted**. The negative information obligation has been deleted, but HOTREC supports including an information notice to prevent consumer confusion. The concept of Linked Travel Arrangements (LTAs) has been eliminated, which HOTREC supports. However, the scope of cancellation rights remains broad, and HOTREC suggests limiting this scope to avoid placing undue responsibility on hotels acting as package organizers for all unexpected events.

HOTREC continues to lobby MEPs providing amendments and arguments to ensure the industry's perspective is reflected (HOTREC amendments [here](#)).

Timeline:

- 26 June 2025 – Vote in IMCO committee.
- September/October 2025 – Final vote in European Parliament’s plenary.
- Q4 2025 – Trilogue negotiations start.

Online reviewsLatest news ([here](#) and [here](#)) on the extranet

In early 2024, the European Commission (DG GROW, Tourism Unit) initiated a project on the creation of a **Code of Conduct for online ratings and reviews for tourism accommodation**. The primary objective of this initiative was to foster collaboration among key stakeholders and garner their support for a Code of Conduct focusing on online ratings and reviews within the tourism accommodation sector. The project was awarded to the Verian consortium.

HOTREC provided feedback at multiple stages of the project. In June 2024, HOTREC responded to survey to provide feedback to the initial draft commitments. In October 2024, HOTREC attended a dedicated workshop to discuss various issues raised during the consultation process. In December 2024, a new draft was sent which, among other things, included commitments for accommodation providers. In our response, we criticised the new draft due to unbalanced and unrealistic commitments. HOTREC met European Commission, consultants, BEUC and EUTravelTech on 1 April 2025 to discuss the code.

Some controversial elements remain in the final version of the code including the definition of ‘staying guests’, ‘incentivised reviews’, the removal of the possibility to flag contested reviews and the fact that certain principles that apply to online platforms would also apply to hotels that host reviews. That’s why we’re gathering input from HOTREC members on whether endorsing or not endorsing the code. Both options have risks and benefits. The biggest risk of not signing is political as the European Commission’s tourism Unit and Commissioner Tzitzikostas are both supporting this initiative.

Timeline:

- 23 June 2025 – HOTREC to share [the code](#) and [explanatory briefing](#) to decide to endorse or not.
- July 2025 – Completion of the code (tbc).

In parallel, an **Italian draft law aimed at tackling fake reviews** was formally notified to the European Commission on 17 January 2025 under the TRIS procedure (2025/022/IT), which assesses national measures for their potential impact on the single market. After reaching a consensus on the way forward, HOTREC submitted its formal comment to TRIS on 24 March (available [here](#)). The European Commission has asked Italian authorities to provide clarifications on several points saying that the national law was overstepping on existing EU laws. Italian authorities have since then provided modifications. It’s unclear at this stage whether the European Commission will soon reply or not.

In addition, HOTREC has shared social media materials to amplify a [call for action initiated by our Italian member, FIPE](#). This campaign supports the Italian draft law aimed at addressing fake online reviews. To date, ten HOTREC members have utilised these materials on their social media platforms.

Timeline:

- 22 May 2025 – End of standstill period extended in TRIS
- 10 June 2025 – Italian authorities published their reply on TRIS
- Tbc: The European Commission replies to Italian authorities.

In May 2025, the European Commission launched a targeted [consultation](#) to develop the **EU Sustainable Tourism Strategy** by early 2026. The Strategy will build on the 2022 [Transition Pathway for Tourism](#) and the [Council's conclusions on an EU Agenda for Tourism 2030](#).

HOTREC's action will be twofold:

- reply to the **Commission consultation** and
- develop a **position paper** highlighting our strategic planning for the years ahead.

The green and digital transition as well as resilience remain key pillars for the future of hospitality.

Regarding environmental sustainability we call for simplification of legislations, e.g., Energy Performance of Buildings Directive, the Packaging and Packaging Waste Regulation, the ETS II, the Green Claims Directive. We also emphasise the need for adequate time for companies to comply with these regulations and the development of a business environment that enables effective implementation of adopted laws. Support to enhance circularity and waste management systems should be deployed.

On digital, we count on a fair competitive online environment for restaurants and hotels, as well as on a level playing field between STR and traditional accommodation providers. Additionally, we advocate for support to the digitalisation of SMEs. Digital reputation and management of fake reviews are growing issues of concern.

For resilience, we call for extensive trainings to up-skill and reskill the workforce, the promotion of apprenticeship schemes, and readiness to prevent and react to different crisis. We also promote competitiveness and the reduction of regulatory burdens, through simplified legislation. to implement all these actions, a dedicated budget line for tourism is essential.

HOTREC encourages national associations to reply to the consultation.

Timeline:

- 15 August 2025 – deadline to reply to the consultation
- September 2025 – HOTREC to officially publish its position paper

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We call on the EU to support the sector in **improving its image**, promote **different types of work; simplify existing legislation** (e.g. Pay Transparency and Transparent and Predictable Working conditions).

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Ad Hoc issues

Package Travel Directive (PTD)

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Latest news ([here](#) and [here](#)) on the extranet

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- July 2025 – Completion of the code (tbc).

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The green and digital transition as well as resilience remain key pillars for the future of hospitality.

Regarding environmental sustainability we call for simplification of legislations, e.g., Energy Performance of Buildings Directive, the Packaging and Packaging Waste Regulation, the ETS II, the Green Claims Directive. We also emphasise the need for adequate time for companies to comply with these regulations and the development of a business environment that enables effective implementation of adopted laws. Support to enhance circularity and waste management systems should be deployed.

On digital, we count on a fair competitive online environment for restaurants and hotels, as well as on a level playing field between STR and traditional accommodation providers. Additionally, we advocate for support to the digitalisation of SMEs. Digital reputation and management of fake reviews are growing issues of concern.

For resilience, we call for extensive trainings to up-skill and reskill the workforce, the promotion of apprenticeship schemes, and readiness to prevent and react to different crisis. We also promote competitiveness and the reduction of regulatory burdens, through simplified legislation. to implement all these actions, a dedicated budget line for tourism is essential.

HOTREC encourages national associations to reply to the consultation.

Timeline:

- 15 August 2025 – deadline to reply to the consultation
- September 2025 – HOTREC to officially publish its position paper