

EXECUTIVE SUMMARIES – OCTOBER 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 subject to the Digital Markets Act (DMA). Notably, the DMA's ban on self-preferencing prohibits the use of parity clauses, allowing businesses to offer better deals outside the platform. HOTREC responded with a [press release](#). Since then, however, HOTREC has observed that Booking.com has implemented a strategy that indirectly discourages hotels from diverging from price and availability parity, clearly circumventing the DMA.

HOTREC has therefore kept advocating to challenge Booking.com's compliance solutions on multiple occasions, including:

- A [breakfast event on the DMA](#) with MEP Andreas Schwab (EPP, Germany)
- A meeting with Dragoș 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).
- A session for the European Commission with a Brussels based hotel. The session focused on explaining a meeting with cabinet members of executive Vice-President Teresa Ribera who is in charge of the DMA.
- A presentation before the Internal Market Committee's Working Group on the Implementation of the DMA.

HOTREC prepared [a compliance paper](#) on price parity clauses and shared it with the European Commission. On 15 September 2025, HOTREC met with the DMA Task Force which expressed its interest in assessing Booking.com's broader commercial strategy and its impact on DMA compliance. HOTREC is assisted by consultancy Forward Global who provides legal and strategic advice.

On 24 September 2025, HOTREC submitted its [response to the Commission's consultation on the review of the DMA](#), highlighting, among others, the adverse impact of Booking.com's compliance solutions.

Timeline:

- Q4 2025 – European Commission to gather views on Booking.com's compliance.

Digital Markets Act – Google

[Background documents](#) on the extranet

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 8 July, the European Commission organised a stakeholder meeting where Google presented new mock-ups which nevertheless fell short from addressing HOTREC's concerns. On 9 September 2025, HOTREC met the DMA Task Force together with the European Hotel Forum, Airlines for Europe, and European Regions Airline Association. The Commission indicated that it was up to Alphabet to provide new mocks but did not have a clear timeline nor significant information on the new compliance solution.

On 24 September 2025, HOTREC submitted its [response to the Commission's consultation on the review of the DMA](#), highlighting, among others, the adverse impact of Google's compliance solutions.

Timeline

- Q4 2025 (TBC) – Google's new mock-ups
- May 2026 – European Commission's evaluation of the DMA
- TBC – Possible fine for Google.

Restaurants & late-nights

The last working group was held on 24 September 2025 in person, in Brussels, followed by a lunch event in the European Parliament on [the future of restaurants](#) well attended by MEPs and external stakeholders. All relevant documents are available [here](#).

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 keeps postponing the publication of detailed Q&A now due in Q4 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.

HOTREC, in collaboration with Serving Europe (association of QSR), is involved in drafting guidelines for hospitality expected by the end 2025. It will help operators comply with reuse and refill obligations. 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](#). The [European Commission's cryptic answer](#) confirms at least that the hospitality sector will be consulted on implementation

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. HOTREC members expressed interest in sharing best practices on how to tackle food waste a local level. This will help them negotiate with national authorities on designing implementing measures.

HOTREC supports the renewal of the mandate for 2027-2031 of the EU Platform on Food Losses and Food Waste. 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 25 September 2025. Documents are available [here](#).

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. In September 2025, HOTREC met with the European Commission unit responsible for STR regulation, which was nearing completion of its technical support framework to help Member States establish data-sharing systems. Secondly, EU member states adopted a [VAT in Digital Age Package](#), which requires STR platforms to collect and remit VAT to tax authorities.

The new European Commission is renewing efforts to regulate STR in connection to their impact on housing affordability and availability. Commissioner for Energy and Housing, Dan Jørgensen (Denmark), has been tasked with developing a **European Affordable Housing Plan (EAHP)**, which is expected to include further measures addressing STRs. This commitment was reaffirmed by Commission President Ursula von der Leyen during her State of the Union address on 10 September 2025, where she announced a forthcoming legal initiative on STRs. In response, HOTREC submitted [input to the EAHP call for evidence](#) and is preparing its contribution to the broader consultation.

Meanwhile, on 25 September 2025, the European Parliament's special committee on the housing crisis (HOUS) reviewed a [draft report](#) by MEP Borja Giménez Larraz (EPP, Spain), which also highlights the negative impact of STRs on housing. HOTREC has already met with MEP Larraz to present key data on STRs and their link to overtourism and housing pressures.

Timeline:

- 17 October 2025 – Deadline for the European Commission's consultation on the European Affordable Housing Plan (EAHP)
- 20 October 2025 – Deadline for amendments to MEP Larraz's draft report
- Q1 2026 – EAHP publication

Sustainability

The next working group takes place on 3 October 2025. All relevant documents of the 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 ENVI and IMCO committees ([consolidated report](#)) during its plenary session. The Council reached its [general approach](#) on 17 June 2024.

Before summer, HOTREC engaged in a strong advocacy campaign with the EPP and ECR groups from the European Parliament, as well as several other stakeholders sharing concerns with the outcome of the trilogue negotiations between the European Parliament and the Council (last [joint statement](#) issued in July 2025). The substantiation of the claims, which need to be scientifically proved and based on a life-circle, constitutes a tremendous burden for companies.

At present there is uncertainty about the next steps of the file:

- A Commission spokesperson mentioned in July its intention to withdraw the file. This action was heavily criticised by S&D and Green MEPs from the European Parliament. The Commission did not comment on the topic ever since.
- The Danish Presidency seems to be willing to work with Member States on securing enough majority within the Council to pursue negotiations with the Parliament.
- Within the European Parliament there is still no majority to continue negotiating: EPP + ECR + Patriots ask for the proposal to be withdrawn.

At national level, HOTREC members should be very active in contacting the respective national experts and express their position clearly (it would help, if you explicitly ask for the withdrawal).

Timeline:

- Q4 2024 – Member States to discuss the general approach.

Social Affairs/SSD

The Social Affairs working group took place on 17 September 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

[Latest briefing on the extranet](#)

Trade unions have been asking for a Directive on subcontracting to be issued by the Commission. EFFAT, our trade union counter-part, issued a [position paper](#) asking for subcontracting to be banned for companies primary functions and asking for joint liability of actors, when subcontracting.

In July 2025, HOTREC published its [position paper](#). The main points are:

- No legislation is needed on subcontracting at EU level.
- An EU-wide subcontracting limit risks damaging efficiency, innovation, and SME participation.
- 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.
- To avoid any possible abuse, solutions are found through enforcing current legislation and encouraging coordination of labour inspections (with the agreement of Member States).

Also in July 2025, MEP Danielson (S&D/Sweden) published his [INI draft report](#). Overall, it calls on the Commission to issue a Directive; it limits subcontracting to two tiers and proposes subcontracting to ensure joint liability along the chain. HOTREC proposed amendments to the report and called on the support of members.

Timeline:

- December 2025 – Vote EMPL committee.

Traineeship Directive

[Latest briefing on the extranet](#)

On 24 March 2024, the European Commission published a [proposal for a Directive Traineeships](#). The main aim is to improve working conditions for trainees and combat "false traineeships". The Council reached its [general approach](#) on 19 June 2025.

On 23 September 2025, the European Parliament approved the EMPL Committee draft report by MEP Alicia Homs Ginel (S&D/Spain). The main outcome of the vote is as follows:

- Scope: apprenticeships or traineeships that are integral to education and training are excluded. But traineeships part of labour market policies are included.
- Payment: should be included, in accordance with national law, collective agreements or practice.
- Collective bargaining: it cannot derogate from the Directive.
- Different treatment of trainees on objective grounds is not possible anymore.

On 8 October 2025, the negotiation mandate was confirmed at the plenary meeting of the European Parliament.

HOTREC will now distribute its position paper for the negotiations between the Council and the European Parliament. HOTREC supports the Council general approach.

Timeline:

- Q5 2025 – 2026: agreement between Council and the European Parliament to be reached.

Fair Labour Mobility[Latest briefing on the extranet](#)

On 16 September 2025, the European Commission organised a high-level dialogue meeting, with Vice-President Mînzatu. The objective was to discuss the challenges and opportunities presented by the implementation and enforcement of the existing rules on labour mobility.

HOTREC sees labour mobility as an opportunity to decrease the labour and skills shortages. Digitalisation should support labour mobility. Examples of tools include:

- Establishing the EU Talent Pool as a one-stop online portal linking private and public databases.
- Interconnecting national systems and harmonizing forms to facilitate cooperation between administrations.
- Developing a European digital social record to easily track rights (healthcare, unemployment, pensions) across the EU.
- Creating more accessible multilingual portals with integrated chatbots and intercultural training resources.

It is to note that trade unions asked for more EU legislation on the topic, namely on subcontracting.

Timeline:

- 2026 – European Commission to present the strategy.

Ad Hoc issues**Package Travel Directive (PTD)**[Latest news](#) on the extranet

On 11 September, the European Parliament adopted its position suggesting leaving the limitation of prepayments to the discretion of member states.

EU member states in Council will now negotiate with European Parliament's representatives. HOTREC will advocate to delete the remaining 24-hour timeframe for a package as well as the limitation of prepayments left to member states. HOTREC has called on its members to disseminate its proposal for compromise in trilogue available [here](#).

Timeline:

- September 2025 – Trilogue negotiations start.
- End of 2025 – expected end of trilogue negotiations.

Online reviewsLatest news ([here](#) and [here](#)) on the extranet**The Code of conduct on online ratings and reviews for tourism accommodation**

On 1 September 2025, HOTREC signed [the Code of Conduct for online ratings and reviews for tourism accommodation](#), a project initiated early 2024. Platforms such as Expedia, Tripadvisor and Booking.com together with their European association also signed 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.

Far from being perfect, the code marks the beginning of a necessary journey—one we hope will be reinforced through the upcoming EU Consumer Agenda and the Digital Fairness Act.

Italian law against fake reviews

In parallel, HOTREC submitted [another contribution](#) in support of the revised Italian law against fake review (HOTREC previous comments from 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.

Timeline:

- October 2025 – European Commission’s decision on Italian law.

Sustainable Tourism Strategy 2025

[Latest news](#)

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:

- Publish its [vision paper](#) highlighting our strategic planning for the years ahead.
- Reply to the Commission consultation.

The green and digital transition as well as resilience remain key pillars for the future of hospitality. We call on the EU to simplify procedures and reduce red tape to ensure coherence across EU legislation.

HOTREC’s key priorities for a Sustainable Tourism Strategy include:

- **Workforce & Skills:** Support training, apprenticeships, legal migration, and the swift roll-out of the EU Talent Pool.
- **Sustainability:** Achieve climate goals with SME-proof legislation, tailored support for energy-intensive hospitality, and realistic implementation timelines.
- **Digital Fairness:** Full enforcement of the Digital Markets Act & Digital Services Act, effective STR regulation, and action against fake reviews.
- **Seamless Travel:** Faster digital visa procedures, strong connectivity, and resilience planning for future emergencies.
- **EU Funding:** A dedicated tourism budget line with simplified access for SMEs, supporting training, digitalisation, infrastructure, and crisis preparedness.

Timeline:

- Q2 2026 – European Commission to present its Strategy