



Package Travel Directive – HOTREC’s proposal for compromise in trilogue

17 September 2025

The [European Parliament’s position](#) on the revision of the Package Travel Directive (PTD) adopted on 11 September represents a step forward compared to the [initial proposal from the European Commission](#), **yet the balance is still not fully achieved.**

HOTREC¹ recognises the European Parliament’s efforts to address some of the concerns raised by the tourism sector, including **dropping the 3 hours definition of a package** and the concept of **linked travel arrangements (LTAs)**. However, the revised text continues to raise important issues that could impact travellers, tourism operators as well as fair competition and the functioning of the Single Market.

Background

In Europe, 99% of businesses in the hospitality industry are small and medium-sized enterprises (SMEs), many of which are highly dependent on package holidays and operate on a seasonal basis. Hotels are primarily providers of services and accommodation to package organisers.

Individual tourism services, such as hotel stays and services offered on site, should therefore remain outside the scope of the PTD. The risks associated with package travel including transportation, which justify consumer protection measures like insolvency insurance, do not arise with individual services such as a single hotel night or other on-site activities.

We welcome the European Parliament’s amendment to recital 10, which clarifies that *“different on-site activities that are provided as an intrinsic part of or typically associated with accommodation, regardless of their value, should not result in the creation of a package if these services are combined only with accommodation.”*

Below, we set out our views on the remaining controversial elements, provide a summary of our proposals and suggest amendments. This paper should be read in conjunction with [HOTREC full position paper](#) on the revision of the Package Travel Directive.

The final outcome will be determined in the upcoming trilogue negotiations. HOTREC hereby presents its proposal for compromise in trilogue negotiations due to start on 24 September 2025.

¹ HOTREC is the Association of Hotels, Restaurants & Cafes in Europe, which brings together 47 member associations from 36 countries. Our industry is characterised by a high level of entrepreneurship, with 99% of businesses classified as small and medium-sized enterprises (SMEs). We represent over 2 million businesses that support over 10 million jobs.



1. PREPAYMENTS (Article 5a)

The risk of fragmentation remains high if Member States are allowed to set diverging rules on prepayments. Limitation of prepayments will create liquidity challenges for hoteliers during the low season and particularly affect low-to-middle income travellers benefiting from "early bird" rates².

[We support the Council's mandate rejecting the limitation of prepayments.](#)

2. PRE-CONTRACTUAL INFORMATION (Article 1)

This revision is an opportunity to simplify mandatory consumer information, which is currently overly complex, and ensure guests receive clear pre-contractual details about their booking and the protections offered by packages.

[We support the Commission's proposal clarifying pre-contractual information.](#)

3. DEFINITIONS (Article 3 (2))

The introduction of a new package definition of '3 hours' and '24 hours' will confuse both consumers and businesses, adding unnecessary complexity instead of clarity. Changing the terms of a first contract will have legal and financial implications. Given the multiplicity of booking channels available today, keeping track of reservations and ensuring it's for the same journey, within an appropriate time frame, would be difficult when not impractical, especially for small hotel establishments.

[We support the Council's mandate removing both timeframes.](#)

4. OFFICIAL TRAVEL WARNINGS (Article 12 (3a))

Travellers shall assume financial risks when they have been duly informed about travel restrictions and nonetheless proceeded with a booking.

[We support the European Parliament's position on travel warnings.](#)

5. VOUCHERS (Article 12 (a))

Package organisers should be allowed to issue vouchers in exceptional circumstances. Limiting the transferability of vouchers to only once will ease administrative burdens.

[We support the Council's mandate removing both timeframes. We call to let organisers issue vouchers to prevent liquidity loss in exceptional circumstances.](#)

6. PENALTIES (Article 25)

Penalties should be dissuasive and proportionate and therefore based on the share of package holidays sold by a business, not on the total turnover.

[We support the Commission's proposal calling for proportionate penalties.](#)

² See more in [HOTREC position paper on PTD](#), May 2024.