

Centro do Portugal  
ECTAA's Preferred Destination 2017

# ANNUAL REPORT 2017

**ECTAA**

THE EUROPEAN TRAVEL AGENTS'  
AND TOUR OPERATORS' ASSOCIATIONS

[ectaa.eu](http://ectaa.eu)

**Merike Hallik**  
President of ECTAA



## / Introduction

Dear colleagues,

Dear friends,

2017 has been an interesting but challenging year.

A number of European legislations and requirements impacting travel agents and tour operators will come into force in 2018, among other a complex new package travel directive, a complete new set of data protection rules, a new payment services directive prohibiting surcharging for card payments, new rules on the processing and transfer of passenger data, and the requirement for IATA agents to comply with the payment security standard, PCI DSS. A lot of work has gone into ensuring a smooth transposition of these laws into national legislation and preparing the trade for the upcoming changes.

In parallel, new legislative initiatives have been brewing in Brussels. ECTAA has been busy on various fronts: better enforcement of consumer protection legislation, revised rail passenger rights, possible new passenger rights in multi-modal passenger transport, a possible instrument of collective consumer redress, just to name a few.

A lot of work and time has also been invested on IATA matters, notably on the modernisation of the IATA settlement system, aiming primarily at securing airlines' money but adding complexity and cost for travel agents. ECTAA managed to mitigate some of the harmful proposals (higher RHC threshold, maintenance of alternative forms of payment, etc.) but what needs to be done is a fundamental reform of the Passenger Agency Programme and the Passenger Sales Agency Agreement, which continue to operate under 1980 rules.

Priority in 2018 will be the modernisation of governance rules and a more balanced approach between airlines and agents, in particular as regards airline failure protection, acceptance of travel agents' credit cards and more flexibility in forms of payment.

2018 promises to be equally challenging! Our priority will be the upcoming review of air transport legislation that could have an impact on agents' access to airfares and their ability to compete with airlines' direct sales. Consumer protection legislation and IATA matters will continue to dominate the work programme in 2018.

I thank all our Members for their support and participation in the ECTAA matters and look forward to continuing the fruitful collaboration in 2018.

**Merike Hallik**  
President of ECTAA

A handwritten signature in black ink, appearing to read 'Merike Hallik', written over a light blue background.

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# / About ECTAA

## MISSION OF ECTAA

ECTAA is the voice of European travel trade, representing ECTAA Members who speak for Europe's travel businesses.

ECTAA works to drive growth and competitiveness in the European travel industry by working with Members to inform and shape the debate in the European institutions and industry bodies.

## ACTIVITIES

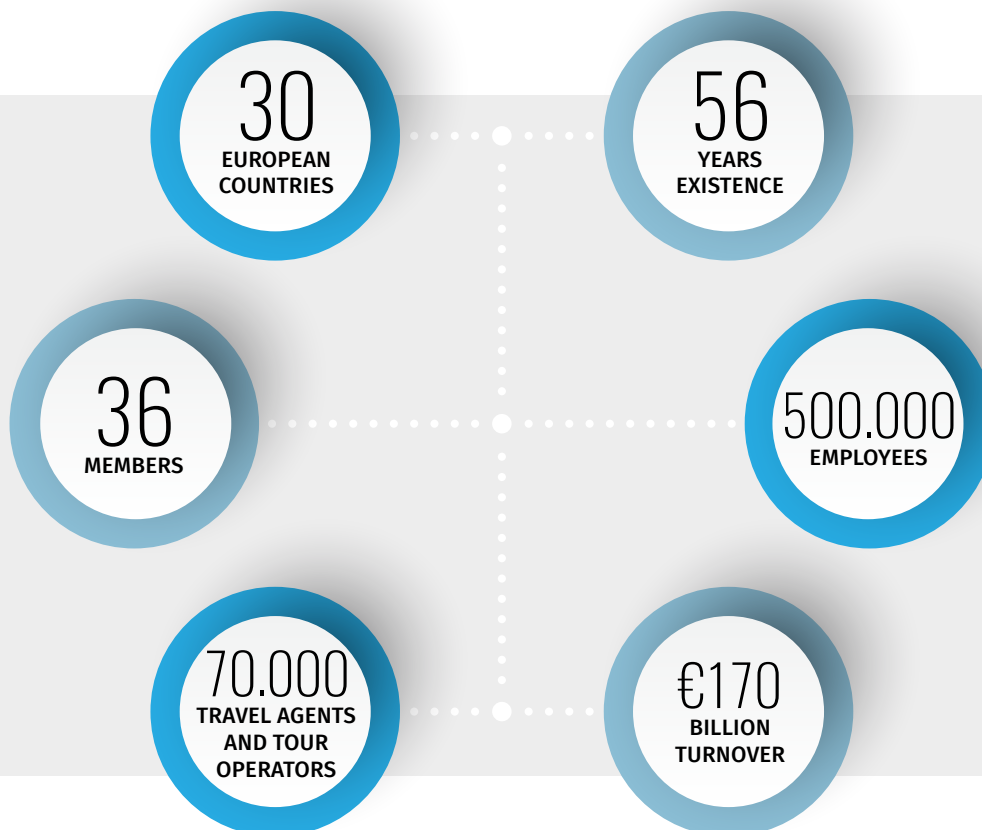
ECTAA's activities range from European Union policy affairs (tourism, consumer protection, transport and competition, visa and border control, standardization, etc.) and IATA matters (New Distribution Capability, New Generation Settlement System, etc.) to destination matters (promotion of selected destinations, dealing with specific destination issues, such as health and safety, travel restrictions, etc.).

## WHO WE ARE

ECTAA regroups 32 national associations of travel agents and tour operators of 27 EU Member States, one accession country (Montenegro) and 2 EEA/EFTA countries (Norway and Switzerland). It also counts 4 International Members from Israel, Malaysia, Morocco and Tunisia.

## REPRESENTATION

ECTAA represents some 70,000 travel agents and tour operators in Europe, which provide consultancy and sell transport, accommodation, leisure and other tourism services as well as combined products to leisure and business customers. The turnover generated by travel agents and tour operators in 2016 is estimated at €170 billion. They employed some 500,000 people in 2016. According to IATA, travel agents account for 60% of airline tickets issued worldwide.



# / Our successes in 2017

## SECURITY IN ELECTRONIC PAYMENTS

Following concerns expressed by Members, ECTAA lobbied and obtained an exclusion of corporate payment solutions from a potentially damaging regulation, which would have introduced unnecessary security requirements for Travel Management Companies (TMCs). The latter would have had to introduce stricter customer authentication procedures in their automated payment solutions, such as lodged and virtual credit cards. Yet, the identification of the customer is not possible for lodge and virtual cards, which are used by many different employees. This would have weakened the attractiveness of using a TMC for corporate clients.

## AGENTS' CASH SALE RESTRICTIONS

As part of its plans to modernise the settlement system (IATA NewGen ISS), IATA wanted to introduce a sales capping, called 'Remittance Holding Capacity' (RHC), which would have required agents to pay upfront to airlines, when their average BSP cash turnover increases by 15% compared to the three highest reporting periods in the previous year. Following long discussions and the intervention of ECTAA at the PAPGJC, IATA eventually agreed to increase the RHC to 100%. While this new threshold constitutes an improvement, ECTAA still challenges the legitimacy of the RHC, which is a collective capping of agents' sales by airlines.

## IATA GOVERNANCE

All IATA distribution related issues are unilaterally decided by airlines in the Passenger Agency Conference (PACConf). Agents have no say and no vote. Following ECTAA's repeated request, travel agents' representatives have been authorized to attend part of the Conference and express the agents' views on all matters affecting them. This is a small step in the direction of a more balanced and efficient governance of the IATA Agency Programme, which ECTAA has been advocating for many years and will continue to do so in the future.

## AIRLINE DISTRIBUTION COST CHARGE

On proposal of ECTAA, MEP Claudia Monteiro d'Aguiar raised an oral question in the plenary session of the European Parliament on the distribution cost charges introduced by a number of airlines for bookings made through a Computerised Reservation System (CRS). MEPs expressed serious concerns regarding the negative impact of distribution cost charges on consumers' ability to compare airfares. They urged the Commission to take a decision in the complaint lodged by ECTAA against Lufthansa group for infringement of European legislation on CRSs, pending since 2 years. The oral question was signed by 50 MEPs from different Member States and different political groups, thanks to an efficient coordination among ECTAA and its Members.

## IATA POST-BILLING DISPUTE TREATMENT

Travel agents will maintain their right to recourse to the Travel Agency Commissioner in case of default action. This right was removed in the process of revising Resolution 818g on post-billing dispute treatment. IATA accepted ECTAA's proposal for amendment to the Resolution 818g and included the explicit reference to the recourse of the Travel Agency Commissioner in default actions.



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## BETTER ENFORCEMENT OF CONSUMER LEGISLATION

ECTAA has secured a number of improvements in the revision of the European Consumer Protection Cooperation (CPC) legislation, which provides rules on how national consumer authorities can cooperate with each other at EU level and tackle infringements of consumer protection. Firstly, transport is now included in the scope. This will ensure that consumer legislation, such as rules on package travel and transport (air passenger rights in all modes of transport, tariffs in air services) are equally enforced, ensuring a better level playing field. Secondly, the legislation allows national professional organizations, such as ECTAA Members, to alert national consumer authorities of infringements by companies.

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## TRAVEL AGENTS' VAT RULES

The special VAT system for travel agents is in dire need of review. This is what ECTAA has been advocating for many years and now it is confirmed by a study carried out by KPMG on behalf of the European Commission. ECTAA and its Members have actively contributed to the 8 months study. Mirroring much of what ECTAA has said in the past, the study concludes that the special rules for travel agents should be maintained, but that a review is necessary to address the distortions of competition and make the rules more future proof.

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## RECOGNITION OF TOURISM

Europe is the world's number one tourist destination with a market share of 50% in 2016. The tourism industry generates 10.2% of total EU GDP, a figure which is forecasted to rise to 11.2% of GDP by 2027. Despite this, our industry is still not sufficiently recognised by decision-makers at European and national level. ECTAA has joined a coalition of industry stakeholders and political figures - The Tourism Manifesto - to address this situation. A first success can be claimed: Thanks to MEP Monteiro de Aguiar, Tourism is for the first time included in the priorities of the European People Party's Group for the next EU Multiannual Financial Framework, which proposes the creation of an exclusive budget line dedicated to Tourism.

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## ALTERNATIVE FORMS OF PAYMENT

Thanks to ECTAA's efforts, travel agents will have a choice between different providers of pay-as-you-go e-wallet solutions for issuance of airline tickets. IATA's initial plan was to impose one single payment method, notably Easy Pay, IATA's own payment product. This effectively prevents other payment providers to propose alternative competitive e-wallet solutions. ECTAA highlighted that a collective decision of airlines to impose their own payment solution in certain circumstances contravenes EU competition rules. This was finally accepted and changed.

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## IMPLEMENTATION OF PACKAGE TRAVEL LAW

Member States were given until 1 January 2018 to transpose the complex new rules on package travel and linked travel arrangements. ECTAA has assisted its Members in several ways, notably coordinating and sharing information on the transposition process in the various countries, as well as legal assistance on specific questions regarding the interpretation of the most complex provisions of the legislation. A workshop with key EU decision-makers and the industry was organised in April 2017, highlighting the main problem areas of transposing said legislation.

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## DATA SECURITY IN CREDIT CARD PAYMENTS

ECTAA managed to obtain a 10 months postponement of the deadline for IATA accredited agents to be compliant with the Payment Card Industry (PCI) Data Security Standard (DSS). In 2016 IATA reviewed Resolution 818g and added an obligation for travel agents to comply with PCI DSS by 1 June 2017. Given the complexity of the PCI DSS certification process, IATA agreed to postpone the deadline until 1 March 2018 and develop a PCI DSS wizard tool to help agents in the process.

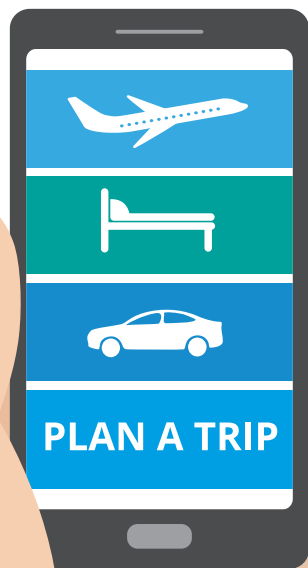
# / Our priorities in 2018

Each year the European Commission adopts an ambitious work programme for the next year, which includes a number of legislative and non-legislative initiatives that all have a direct or indirect impact on travel agents and tour operators.

In parallel, other organisations and stakeholder groups develop standards and rules that have a bearing on the business of travel agents and tour operators.

The list of initiatives is long (see work programme).

In 2018, ECTAA will focus on the following:



## 1

### REVIEW OF THE CRS CODE OF CONDUCT

The Commission plans to evaluate the European legislation on Computerized Reservation Systems (CRS). The aim is to see whether the legislation has achieved its objective of offering consumers an unbiased choice of air fares with low airline ticket distribution costs via effective competition between the CRS providers. ECTAA's priority will be to ensure travel agents' non-discriminatory access to airlines' fares and inventory.

## 2

### AIRLINE BANKRUPTCIES

ECTAA will intensify its efforts to convince the EU legislators to introduce consumer protection against airline failures. 2017 has been a record year in terms of airline failures, including Air Berlin, Alitalia, Monarch Airlines and Niki. There is currently no obligation on airlines to put up guarantees for the repatriation and refund of stranded passengers when they go bankrupt. By contrast, tour operators need to take out professional liability insurance to protect their customers against supplier failures, such as airlines.

## 3

### DATA PROTECTION

The new Data Protection Regulation (GDPR) will enter into force in May 2018. All customer data handled and processed by travel agents and tour operators will be affected. There is an increasing demand to understand and mitigate the risks when handling customers' personal data. ECTAA will be reviewing questions relating to the GDPR application in the newly formed working group specifically focused on data protection.

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# / Our priorities in 2018

## 4

### IATA AFFAIRS

ECTAA will focus on the implementation of New Generation of IATA Settlement Systems (NewGen ISS), which will introduce (i) new forms of travel agent accreditation (ii) Remittance Holding Capacity (a threshold after which cash as a form of payment is disabled), (iii) a Global Default Insurance and (iv) IATA EasyPay (pay-as-you-go e-wallet solution for issuance of airline tickets). ECTAA will also assess the legitimacy of some rules, notably airlines' refusal to accept agents' credit card as form of payment. In addition, ECTAA will assist in helping travel agents to become PCI DSS compliant, which is a condition for travel agents to retain IATA accreditation.

## 5

### APPLICATION OF THE PACKAGE TRAVEL LEGISLATION

The new package travel legislation foresees a report by the European Commission by 1 January 2019 on online bookings made at different points of sale such as click through packages and linked travel arrangements, with recommendations on whether an adjustment or broadening of the definitions are required. ECTAA will contribute to this study with a view to obtaining a modification of the legislation to ensure a level playing field between all suppliers of package travel and linked travel arrangements.

## 6

### INJUNCTION PROCEDURE AND COLLECTIVE REDRESS

The European Commission plans to revise the Injunction Directive, which harmonizes some aspects of the injunction procedure across the EU in particular in the event of consumer law infringements. The Commission may use the opportunity of this revision to introduce a collective redress procedure.

## 7

### REVIEW OF TRAVEL AGENTS' VAT RULES

Referring to the recent study carried out by KPMG, which concluded that the special VAT scheme for travel agents needs to be modernised, ECTAA will be pressing for a revision of the VAT rules of travel agents. A coordinated action at EU and national level will be required to put this matter on the work programme of the European Commission.

## 8

### VISA AND BORDER MANAGEMENT POLICY

The Commission plans to modernise its visa and border management policy to respond to the increased migratory and security challenges faced by the EU. ECTAA will stress a balanced approach between migration and security concerns as well as economic considerations. Europe needs a smart policy that facilitates travel to Europe for legitimate travellers, while maintaining a high level of security.





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# / Work programme of ECTAA for 2018

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## CONSUMER PROTECTION

- ▶ Implementation of the Package Travel Directive and preparation of the application report
- ▶ Revision of the Injunction Directive
- ▶ Possible introduction of consumer collective redress
- ▶ Targeted revision of EU consumer legislations

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## TRANSPORT

- ▶ Better protection of passengers in case of airline' bankruptcy
- ▶ Fitness check of Air Services Regulation
- ▶ Revision of Code of Conduct on Computerised Reservation Systems (CRS)
- ▶ Revision of Air Passenger Rights Regulation
- ▶ Revision of Rail Passenger Rights Regulation

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## IATA

- ▶ ECTAA court case to recover unflown tickets of defunct airline Malev
- ▶ Review of the Passenger Sales Agency Programme
- ▶ Implementation of the New Generation IATA Settlement Systems (NewGen ISS)
- ▶ New Distribution Capability (NDC), One Order, etc.
- ▶ Compliance with PCI DSS

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## TAXATION

- ▶ Revision of the special VAT scheme for travel agents
- ▶ Implementation of guidelines on the VAT treatment of intermediary services
- ▶ Revision of the EU VAT system

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## JUSTICE AND HOME AFFAIRS

- ▶ Implementation of new General Data Protection Regulation (GDPR)
- ▶ Implementation of the Passenger Name Record (PNR) Directive
- ▶ Revision of EU Visa Code
- ▶ Introduction of a European Travel Information and Authorization System (ETIAS)
- ▶ EU visa reciprocity mechanism

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## DESTINATION AND SUSTAINABILITY

- ▶ Destination issues, such as health and safety, travel restrictions, taxes and fees, etc.

& more



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## GOVERNANCE OF INDIRECT AIR TRAVEL DISTRIBUTION

The effectiveness and efficiency of today's IATA's Passenger Agency Programme is no longer fit for purpose as it does not optimally address the broad and varied needs of each and all of the stakeholders within the air travel distribution chain.

ETESA and ECTAA jointly commissioned a study to fully examine key airline distribution related issues, in particular issues resulting from the IATA Passenger Agency Programme, which provides the processes and rules governing the reporting and settlement of agents' sales to airlines. The data supporting the study was gathered through a series of in-depth interviews with a wide spectrum of distribution chain stakeholders which include agents, airlines, GDS and travel associations.

Five key areas of concern to the non-airline distribution chain players were identified. The study makes a number of recommendations to improve the effectiveness and efficiency of the IATA Passenger Agency Programme in those five areas:

- ▶ **Governance:**  
Change from 'airlines only' governance to inclusive approach

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- ▶ **Risk management:**  
Rebalance the key elements of how risk is controlled and managed between airlines and agents

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- ▶ **Accreditation:**  
Increase both process efficiency and ensure transparency of pricing

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- ▶ **Resolutions:**  
Replace unbalanced unidirectional resolutions with balanced 'business rules'

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- ▶ **Payments:**  
Encourage alternative forms of payments and abandon rule prohibiting agents to pay with their credit card

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The study concludes that a new model should be adopted to govern indirect air travel distribution which requires the active participation of all stakeholders in the 'chain' including airlines, agents and GDS.

<http://www.ectaa.org/files/cms/governance-of-iata---white-paper.pdf>

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## TRAVEL AGENTS' VAT SCHEME

**VAT rules for travel agents are no longer adapted to the market and must be revised.**

KPMG has carried out a study on behalf of the European Commission on the application of the special VAT scheme for travel agents (often referred to as 'TOMS') in Member States and assessment of reform options. The study concludes that while TOMS should be retained, it needs to be reviewed to (i) ensure that TOMS rules are in alignment with the general EU objectives and (ii) address a number of distortions of competition (treatment of B2B supplies and varying definitions of 'travel facilities') and material issues (different VAT treatment between EU / non-EU travel agents and margin VAT calculation) arising from the current application of the TOMS. ECTAA and its Members have actively contributed to this study.

[https://ec.europa.eu/taxation\\_customs/sites/taxation/files/travel\\_agents\\_special\\_vat\\_scheme\\_en.pdf](https://ec.europa.eu/taxation_customs/sites/taxation/files/travel_agents_special_vat_scheme_en.pdf)

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## AIRLINE DISTRIBUTION COST

**Expert study refutes airline claim that direct distribution is less expensive than indirect distribution.**

The study carried out by Infrata highlights the deficiencies in previous distribution cost calculations presented by airlines.

The report concludes that selling through travel agents using neutral booking platforms (often called global distribution systems or "GDSs") is just as cost-effective for airlines

as selling “direct”. When taking into account advertising, marketing, customer support and payment fees, as well as the significant costs of online customer acquisition such as search engine fees, the costs of “direct” bookings and those made through online and offline travel agencies is equivalent. Airlines seeking to justify a move to less transparent “direct” distribution schemes often omit from consideration these important – and unavoidable – costs.

Some airlines claim that sales made via travel agents using neutral booking platforms cost them several times more than direct sales. Yet the evidence shows that there is no reduction in costs when airlines push for more direct sales – and costs actually increase for some categories of airlines.

Infrata also found that the higher the proportion of “direct” distribution, the higher the cost to airlines of customer acquisition, marketing, advertising, technology development and customer service.

The findings raise significant questions about what must drive an airline to encourage more direct distribution of fares, if not cost savings.

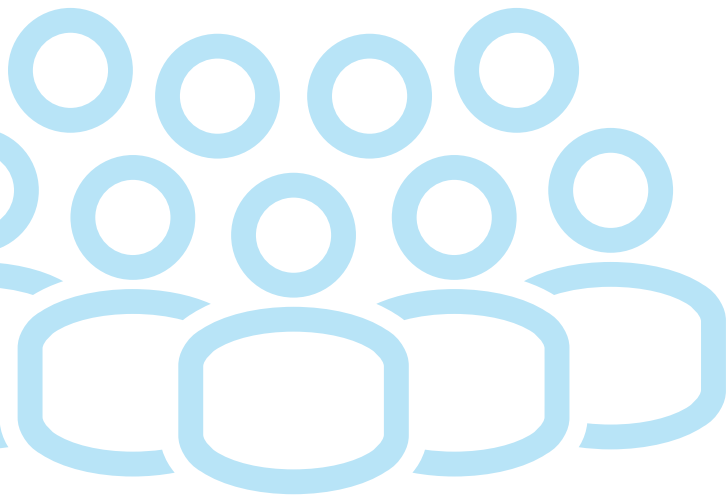
<http://www.ectaa.org/files/cms/20171024-infrata-airline-distribution-myths-full-report.pdf>



AIRLINE DISTRIBUTION COST



## / Events and projects



### WORKSHOP ON IMPLEMENTATION OF THE PACKAGE TRAVEL DIRECTIVE

On 11 May 2017 ECTAA organized with EGFATT (the European Guarantee Funds' Association for Travel and Tourism) a workshop on the challenges of the transposition of the Package Travel Directive in the European Parliament (EP). The event was held under the patronage of Member of the European Parliament Claudia Tapardel, co-chair of the EP Tourism Intergroup.

The aim of the workshop was to identify and discuss best practices in the EU when implementing the directive as regards the main provisions of the text and the financial security in the event of a travel organizer's insolvency.

The event gathered speakers from all concerned sectors (EU institutions, trade and consumer associations, new online players, guarantee funds and insurance companies) to discuss the challenges in transposing this complex piece of legislation before its entry into force on 1 January 2018. This event gathered more than 120 participants from all over Europe.



## TRAVEL ADVICE WORKSHOP

On 25 October 2017 the Estonian Presidency of the EU held a joint workshop with ECTAA on travel advisories. The objective was to bring together the private and public stakeholders and exchange views on the challenges and successes of travel advice from the point of view of the authorities (Member States, EU European External Action Service), the trade (travel agents and tour operators) and the travellers.

The first work session on the current situation showed the existence of many different forms of travel advisories (information, advisory levels, number of advisory levels, maps, etc.).

The second work session on the future travel advisories raised an interesting question on the objective of travel advisories – are they meant for information or for warning and thus constricting travel? What are the legal implications of a travel advice? From a tour operators' perspective this is clear – a travel advice is binding and

will have a direct impact on package travel customers. But Member States have different views. It would seem that courts also have differing interpretations. The workshop concluded that while harmonisation may not be feasible in this area, more coordination of travel advice could be promoted.

## EU PROJECT 'PARTNERSHIPS IN TOURISM'

'Partnerships in European Tourism' is an EU initiative aimed at supporting EU tourism businesses and operators wishing to expand their businesses into the Chinese and US markets, through tutoring activities, facilitating new collaborations and partnerships around trans-European tourist products and the organisation of B2B matchmaking and other promotional events alongside international fairs.

The programme offers the opportunity to learn about and directly engage with the Chinese and US markets at a series of in-market and European-based events. The launch event in Venice and events in China will form part of the 2018 EU-China Tourism Year.

The project is entrusted to the ETOA (European Tourism Association), ETC (European Travel Commission) and ECTAA.

<https://www.eutravelpartnerships.org/>



# / Preferred Destination 2017

*The Centre of Portugal is a beautiful region of Portugal, a place where one can discover villages of rare beauty frozen in time, breath-taking landscapes, cities that know how to preserve their history and at the same time embrace modernity.*



The Centre of Portugal is a region full of history. It counts many sites included in the UNESCO list of World Heritage, such as the Monasteries of Alcobaça and Batalha, the Convent of Christ in Tomar and Coimbra University. There

are also 12 historic villages located in the beautiful landscape of the Portuguese Beira with centuries of old heritage proudly displaying the history of the region.

But it's not only about history. For the shop addicts, there is the charming city of Leira with four shopping districts: Rodrigues Lobo Square, Sant'Ana Square, Castle district and riverside district.

Not far from Leira is Fátima, which includes one of the most important shrines of the world dedicated to the Virgin Mary. This Sanctuary welcomes millions of pilgrims and tourists from all over the world. The fame of this place is the result of the Apparitions of Our Lady of the Rosary to three shepherd children.

The Centre of Portugal is also famous for its traditional gastronomy as well as excellent wine selection. Surrounded by mountains and rivers Vouga and Dão, lies the city of Viseu. This is an excellent place to do wine tasting and to take a walk through the museums and churches where you can find dark granite, typical in the region, surrounded by contrasting white façades.

There is also Bairrada, known as the land of sparkling wine. But it is more than that: the region counts numerous spas set in a beautiful landscape and is perfect for wellness tourism.

Among the region's other cities, Aveiro is known as Portugal's Venice, thanks to the canals linking it to a vast, mysterious marshland. It's renowned for art nouveau houses, brightly painted boats and artery-clogging egg and sugar confections called ovos moles.

From mountains to sea, there are many reasons to visit the Centre of Portugal.

It was a huge honour to be ECTAA's Preferred Destination 2017!

A special thanks to APAVT, particularly, Pedro Costa Ferreira, Merike Hallik and Michel de Blust!

Thank you all, travel agencies and tour operators, for your effort on the promotion of our extraordinary region!

Hope to continue counting on your efforts in the promotion of our region!



**Pedro Machado**  
Turismo Centro Portugal, President

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# / Representation of ECTAA in consultative bodies

As the voice of European travel agents and tour operators, ECTAA participates in a number of consultative bodies and forms alliances at international and European level. The national level is covered by the Member associations of ECTAA.

ECTAA participates in:

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## EU INSTITUTION STAKEHOLDER GROUPS

- ▶ REFIT of Consumer Laws Stakeholders Group
- ▶ Digital Tourism Network Steering Group
- ▶ European Parliament Tourism Intergroup

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## IATA CONSULTATIVE BODIES

- ▶ Passenger Agency Programme Global Joint Council (PAPGJC)
- ▶ Agency Debit Memos (ADM) Working Group
- ▶ Transparency in Payments (TiP) Working Group
- ▶ PCI DSS Working Group

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## FACILITATION AND STANDARDIZATION

- ▶ ECAC Facilitation Sub-Group on the Transport of Persons with Reduced Mobility
- ▶ ECAC Facilitation Sub-Group on Immigration (border control matters)
- ▶ ISO Technical Committee on tourism standardisation

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## UNWTO WORKING GROUPS

- ▶ Working Group on the Convention on protection of tourists and rights and obligation of tourism service providers
- ▶ Task Force for the Protection of Children in Tourism

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## ALLIANCES WITH OTHER STAKEHOLDERS

- ▶ Network for the European Private Sector in Tourism – tourism stakeholders
- ▶ Tourism Manifesto – tourism stakeholders
- ▶ Full Service Model – rail distribution stakeholders
- ▶ TACG – Trade Associations Consumer Group – Industry stakeholders on consumer protection matters

# / Who's who at ECTAA

## LIST OF STRATEGIC COMMITTEE MEMBERS

- ▶ Merike Hallik, President (EE)
- ▶ Boris Zgomba, Vice-President (HR)
- ▶ Corinna Kleinert, Vice-President (DE)
- ▶ Frank Oostdam, Vice-President (NL)
- ▶ Pawel Niewiadomski, Vice-President (PL)
- ▶ Pedro Costa Ferreira, Vice-President (PT)
- ▶ Nikki White, Vice-President (UK)
- ▶ Tomas Olsson, Treasurer (SE)

## LIST OF STAFF

- ▶ Michel de Blust, Secretary General
- ▶ Christina Russe, Deputy Secretary General
- ▶ Ewa Grabiak, Legal Advisor
- ▶ Benoît Chantoin, Legal Advisor
- ▶ Anne Dhoop, Office Manager

## MEMBERS

AUSTRIA	ÖRV	<a href="http://www.oerv.at">www.oerv.at</a>
AUSTRIA	WKÖ	<a href="http://www.reisebueros.at">www.reisebueros.at</a>
BELGIUM	FIT/FTI	<a href="http://www.fti-fit.be">www.fti-fit.be</a>
BULGARIA	ABTTA	<a href="http://www.abtta.com">www.abtta.com</a>
CROATIA	UHPA	<a href="http://www.uhpa.hr">www.uhpa.hr</a>
CROATIA	UPA-HGK	<a href="http://www.hgk.hr">www.hgk.hr</a>
CYPRUS	ACTA	<a href="http://www.acta.org.cy">www.acta.org.cy</a>
CZECH REPUBLIC	ACCKA	<a href="http://www.accka.cz">www.accka.cz</a>
DENMARK	DRF	<a href="http://www.travelassoc.dk">www.travelassoc.dk</a>
ESTONIA	ETFL	<a href="http://www.etfl.ee">www.etfl.ee</a>
FINLAND	SMAL	<a href="http://www.smal.fi">www.smal.fi</a>
FRANCE	ENTREPRISES DU VOYAGE	<a href="http://www.entreprisesduvoyage.org">www.entreprisesduvoyage.org</a>
GERMANY	DRV	<a href="http://www.driv.de">www.driv.de</a>



GREECE	HATTA	<a href="http://www.hatta.gr">www.hatta.gr</a>
HUNGARY	MUISZ	<a href="http://www.muisz.com">www.muisz.com</a>
IRELAND	ITAA	<a href="http://www.itaa.ie">www.itaa.ie</a>
ITALY	CONF TURISMO	<a href="http://www.confiturismo.it">www.confiturismo.it</a>
LATVIA	ALTA	<a href="http://www.alta.net.lv">www.alta.net.lv</a>
LITHUANIA	NTVA	<a href="http://www.ntva.lt">www.ntva.lt</a>
MALTA	FATTA	<a href="http://www.fatta.org">www.fatta.org</a>
MONTENEGRO	CTU	<a href="http://www.ctu-montenegro.org">www.ctu-montenegro.org</a>
NETHERLANDS	ANVR	<a href="http://www.anvr.nl">www.anvr.nl</a>
NORWAY	VIRKE	<a href="http://www.virke.no">www.virke.no</a>
POLAND	PIT	<a href="http://www.pit.org.pl">www.pit.org.pl</a>
PORTUGAL	APAVT	<a href="http://www.apavt.net.pt">www.apavt.net.pt</a>
ROMANIA	ANAT	<a href="http://www.anat.ro">www.anat.ro</a>
SLOVAKIA	SACKA	<a href="http://www.sacka.eu">www.sacka.eu</a>
SLOVENIA	ZTAS	<a href="http://www.ztas.org">www.ztas.org</a>
SPAIN	ACA VE	<a href="http://www.acave.travel">www.acave.travel</a>
SWEDEN	SRF	<a href="http://www.srf-org.se">www.srf-org.se</a>
SWITZERLAND	SRV	<a href="http://www.srv.ch">www.srv.ch</a>
UNITED KINGDOM	ABTA	<a href="http://www.abta.com">www.abta.com</a>

## INTERNATIONAL MEMBERS

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