



THE EUROPEAN TRAVEL AGENTS'
AND TOUR OPERATORS' ASSOCIATIONS



Five Years of Lobbying for a Workable Package Travel Directive

ECTAA's Advocacy on the Revision of
Directive (EU) 2015/2302, 2020–2026



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1. Executive Summary

Six years, three top priorities, and roughly 80% of everything ECTAA asked for in the final text — a very strong result by the normal standards of EU lobbying.

Between 2020 and 2026, ECTAA ran a sustained, multi-channel lobbying campaign on the revision of the Package Travel Directive (PTD), now adopted as Directive (EU) 2026/1024 — from the earliest signals of the European Commission's intentions, through the publication of the legislative proposal, to the political agreement reached by the Parliament and Council on 2 December 2025 and final adoption in March 2026. This report brings together the full record of that campaign: what we did, why we did it, and what it achieved.

The results speak for themselves. The final Directive contains no EU-wide cap on prepayments, deletes the Linked Travel Arrangement category, created in 2015, that had confused businesses and consumers alike, removes the unworkable three-hour package concept, and puts insolvency-protection timelines on a more workable footing. All three of ECTAA's top strategic priorities — prepayments, scope simplification, and containing new cancellation triggers — were substantially achieved.

A word on how to read this result. In EU lobbying, a genuinely good outcome is normally getting a little more than half of what was asked for — legislative texts are negotiated among dozens of stakeholders and 27 governments, and no single voice writes the final version. Against that benchmark, securing roughly three-quarters of our documented demands, plus a clean sweep on the top three priorities, is an excellent outcome, not a middling one. Section 4 sets out exactly how that figure is calculated.

It is also worth stating plainly why the final Directive can look, on a first read, like it contains few new ideas: that is by design, and it is the clearest sign that the campaign worked. Much of ECTAA's six years of work was damage control — identifying the most economically damaging provisions in the Commission's proposal early, and systematically working to remove or neutralise them before they became law. Successful damage control is close to invisible in the final text, precisely because the damage never happened. Where a provision survived in some form — the 24-hour package rule for example — the version that made it into law is one that businesses can navigate without difficulty in practice.

This did not happen by accident. It is the product of nearly 80 documented actions between 2020 and 2026 alone, underpinned by a long-term strategy that ECTAA's Secretariat began preparing as early as December 2019 — before the Commission had even confirmed it would revise the Directive — and by a hard-won adaptation, mid-campaign, to a European Parliament and permanent representations that gave ECTAA far less direct access than it needed. It was also the result of close collaboration between ECTAA and its Member Associations, which worked together effectively to communicate and act in a coordinated and timely manner, maximising the reach and impact of ECTAA's position.

Finally, a small number of issues — cross-border refund alignment and systemic crisis flexibility above all — remain open, and now anchor ECTAA's transposition and passenger-rights agenda for the years ahead (Section 6).

Part One of this report gives members the headlines: why the fight mattered, how the campaign unfolded, what we won, and what it would plausibly have cost to buy this level of engagement from an external Brussels consultancy. Part Two is the full record — strategy, story and evidence — for members who want the detail.

PART ONE

Briefing

The headlines — six pages, for members who want the short version

2. Why It Mattered

The Package Travel Directive is not a transport regulation — it is a consumer-protection instrument, falling under DG JUST rather than DG MOVE. Legislative discussions on it therefore tend to focus on strengthening consumer rights, sometimes without fully weighing the operational and financial consequences for the organisers and intermediaries who have to deliver them. This is one of the areas of EU legislation with a particularly visible impact on citizens' daily lives. It is therefore also an area in which the EU is likely to continue placing emphasis on consumer protection, given its importance for citizens' perception of the practical benefits of EU action.

This makes the PTD one of the most politically sensitive files affecting our sector, and it leaves organised travel — an overwhelmingly SME sector — at a structural disadvantage against larger, better-resourced transport industries such as aviation.

Because package travel is already one of the most heavily regulated travel products in the EU, it has increasingly become the default vehicle through which policymakers strengthen travellers' rights generally, even when the underlying problem lies elsewhere in the value chain. That dynamic became especially visible after the COVID-19 refund crisis of 2020, when the political response focused disproportionately on the PTD even though package organisers were themselves waiting on refunds from suppliers, particularly airlines.

It was in this environment — a consumer-law framing structurally unfavourable to our sector, a pandemic-driven political urgency, and a proposal carrying real economic risk for SME travel businesses — that ECTAA built the campaign described in this report. (Part Two, Section 7 sets out this context in full, including the detailed evidence on lobbying-resource disparities across the travel value chain.)

3. The Campaign at a Glance

The full, year-by-year timeline — with every milestone in both Council and Parliament — is in Part Two. Here is the shape of the six-year campaign in outline:

Dec 2019	ECTAA presents a long-term advocacy strategy to the Board, before the Commission confirms a revision.
2020-2022	COVID refund crisis. ECTAA drives national voucher schemes; Commission's Covid EU Guidelines Reynders flags prepayments as a reform target.
2021-2022	Expert-group work, evidence-building, ICF study consultation; Public Consultation, Reynders references a German-style prepayment model.
29 Nov 2023	Commission adopts its proposal. ¹
19 December 2024	Belgian then Hungarian Presidencies engage constructively; Council position published
Jan-Sep 2025	Parliament phase: IMCO adoption (26 Jun), plenary mandate (11 Sep) ² .

¹ European Commission, Proposal for a Directive of the European Parliament and of the Council amending Directive (EU) 2015/2302 to make the protection of travellers more effective and to simplify and clarify certain aspects of that Directive, COM(2023) 905 final, 29 November 2023. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2023%3A905%3AFIN> European Parliament, Legislative Observatory, Package travel and linked travel arrangements: make the protection of travellers more effective and simplify and clarify certain aspects, procedure file 2023/0435(COD). [https://oeil.europarl.europa.eu/oeil/en/procedure-file?reference=2023/0435\(COD\)](https://oeil.europarl.europa.eu/oeil/en/procedure-file?reference=2023/0435(COD))

² European Parliament, Committee on the Internal Market and Consumer Protection, Report on the proposal for a directive amending Directive (EU) 2015/2302 (COM(2023)0905 - C9-0436/2023 - 2023/0435(COD)), rapporteur Alex Agius Saliba, A10-0140/2025, 15 July 2025. https://www.europarl.europa.eu/doceo/document/A-10-2025-0140_EN.html European Parliament, Amending the Directive on package travel and linked travel arrangements, text adopted P10_TA(2025)0195, 11 September 2025. https://www.europarl.europa.eu/doceo/document/TA-10-2025-0195_EN.html

2 Dec 2025	Parliament and Council reach a provisional political agreement. ³
12 Mar 2026	EP Adoption of the PTD in Plenary ⁴
30 Mar 2026	Council formally adopts the Directive ⁵ ..
29 Apr 2026	PTD Published in Official Journal ⁶

³ European Parliament, Legislative Observatory, Package travel and linked travel arrangements: make the protection of travellers more effective and simplify and clarify certain aspects, procedure file 2023/0435(COD). [https://oeil.europarl.europa.eu/oeil/en/procedure-file?reference=2023/0435\(COD\)](https://oeil.europarl.europa.eu/oeil/en/procedure-file?reference=2023/0435(COD))

⁴ European Parliament, Package travel and linked travel arrangements: make the protection of travellers more effective and simplify and clarify certain aspects, text adopted P10_TA(2026)0085, 12 March 2026. https://www.europarl.europa.eu/doceo/document/TA-10-2026-0085_EN.html

⁵ Council of the EU, Consumer protection: Council gives final sign off to additional safeguards for package travel users, press release, 30 March 2026. <https://www.consilium.europa.eu/en/press/press-releases/2026/03/30/consumer-protection-council-gives-final-sign-off-to-additional-safeguards-for-package-travel-users/>

⁶ Directive (EU) 2026/1024 of the European Parliament and of the Council of 29 April 2026 amending Directive (EU) 2015/2302 to make the protection of travellers more effective and to simplify and clarify certain aspects of that Directive, OJ L, 2026/1024, 8 May 2026. <https://eur-lex.europa.eu/eli/dir/2026/1024/oj/eng>

4. What We Asked, What We Got

A direct, issue-by-issue comparison between ECTAA's public position and the text that was finally adopted. The advocacy story behind each of these results — the arguments, the coalitions, the turning points — is told in full in Part Two, Section 12.

Issue	ECTAA's ask	Final outcome	Verdict
Prepayments	No package-only advance-payment cap; address refunds across the whole value chain instead.	No EU-level cap on down payments ⁷ ; Member States may still regulate in line with Union law.	CLEAR WIN
3-hour package	Remove as unworkable and incompatible with pre-contractual information duties.	Not retained in the final package definition ⁸ .	CLEAR WIN
Linked Travel Arrangements	Delete the LTA category — complex, rarely used, little consumer benefit.	LTA definition, chapter and annex fully deleted ⁹ ; recital confirms no tangible traveller benefit was shown.	CLEAR WIN
Official travel warnings	Preserve case-by-case assessment; avoid automatic legal effect.	Warnings carry “considerable evidential value” but are not an automatic condition.	CLEAR WIN
24-hour package	Avoid automatic, retroactive package creation; keep a workable disclosure mechanism.	New Article 5a non-package labelling mechanism ¹⁰ ; automatic creation only where the trader fails to disclose — easily avoided by compliant sellers.	MOSTLY WON
Place of residence & departure risk	Oppose place of departure/return as a free-cancellation trigger — organisers are not insurers.	Departure, destination and journey remain triggers under Art. 12(2) ¹¹ , but the further extension to place of residence was kept out, and the framing of the “personal circumstances” test (Tez Tour) was tightened, even though the underlying principle could not be removed.	MOSTLY WON
Insolvency protection	Keep protection workable; avoid rigid short deadlines and over-collateralisation.	Security must reflect peak holdings and sales variation; refund window set at 6 months ¹² , up to 9 in exceptional cases.	PARTIAL WIN
B2B supplier refunds	Suppliers holding traveller funds must	Providers must refund organisers within	PARTIAL WIN

⁷ Art. 5(1)(d) of Directive 2015/2302, as amended. Directive (EU) 2026/1024 of the European Parliament and of the Council of 29 April 2026 amending Directive (EU) 2015/2302 to make the protection of travellers more effective and to simplify and clarify certain aspects of that Directive, OJ L, 2026/1024, 8 May 2026. <https://eur-lex.europa.eu/eli/dir/2026/1024/oj/eng>

⁸ Art. 3, point 2), of Directive 2015/2302, as amended. Directive (EU) 2026/1024 of the European Parliament and of the Council of 29 April 2026 amending Directive (EU) 2015/2302 to make the protection of travellers more effective and to simplify and clarify certain aspects of that Directive, OJ L, 2026/1024, 8 May 2026. <https://eur-lex.europa.eu/eli/dir/2026/1024/oj/eng>

⁹ Art. 3, point 5), Chapter VI and Annex II of Directive 2015/2302 deleted. Directive (EU) 2026/1024 of the European Parliament and of the Council of 29 April 2026 amending Directive (EU) 2015/2302 to make the protection of travellers more effective and to simplify and clarify certain aspects of that Directive, OJ L, 2026/1024, 8 May 2026. <https://eur-lex.europa.eu/eli/dir/2026/1024/oj/eng>

¹⁰ New Art. 5a of Directive 2015/2302. Directive (EU) 2026/1024 of the European Parliament and of the Council of 29 April 2026 amending Directive (EU) 2015/2302 to make the protection of travellers more effective and to simplify and clarify certain aspects of that Directive, OJ L, 2026/1024, 8 May 2026. <https://eur-lex.europa.eu/eli/dir/2026/1024/oj/eng>

¹¹ Art. 12 of Directive 2015/2302, as amended. Directive (EU) 2026/1024 of the European Parliament and of the Council of 29 April 2026 amending Directive (EU) 2015/2302 to make the protection of travellers more effective and to simplify and clarify certain aspects of that Directive, OJ L, 2026/1024, 8 May 2026. <https://eur-lex.europa.eu/eli/dir/2026/1024/oj/eng> Court of Justice of the European Union, M.D. v “Tez Tour” UAB (Tez Tour), Case C-299/22, judgment of 29 February 2024. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62022CJ0299> Court of Justice of the European Union, QM v Kiwi Tours GmbH (Kiwi Tours), Case C-584/22, judgment of 29 February 2024. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62022CJ0584>

¹² Art. 17 of Directive 2015/2302, as amended. Directive (EU) 2026/1024 of the European Parliament and of the Council of 29 April 2026 amending Directive (EU) 2015/2302 to make the protection of travellers more effective and to simplify and clarify certain aspects of that Directive, OJ L, 2026/1024, 8 May 2026. <https://eur-lex.europa.eu/eli/dir/2026/1024/oj/eng>

	refund organisers so organisers can refund travellers.	7 days ¹³ where they cancel or fail to perform — but not every Article 12 scenario is covered.	
Crisis mechanism	Allow flexible vouchers and ad hoc Member State aid in a major crisis rather than a rigid, costly EU crisis fund; relax the 14-day refund rule when suppliers cannot pay organisers back.	Voucher regime substantially strengthened and formalised ¹⁴ ; but the ordinary 14-day refund rule remains even in large-scale crises, and no ad hoc State-aid flexibility was introduced.	PARTIAL WIN

Containing the damage: topic by topic

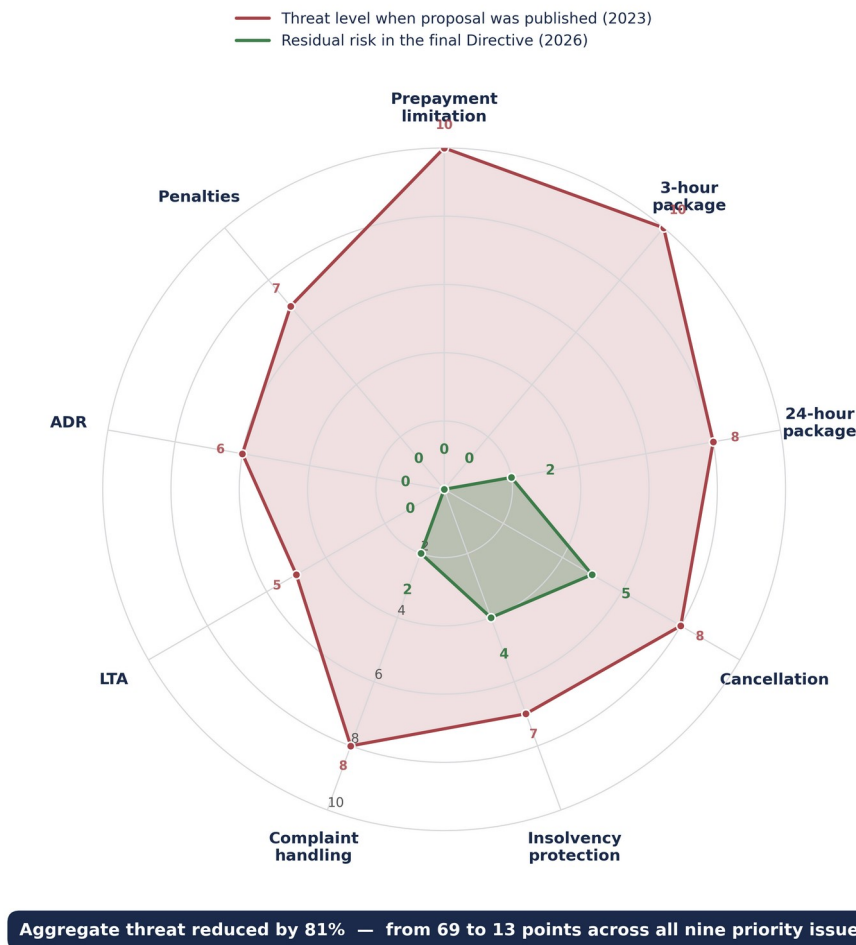
The scoreboard above compares what ECTAA asked for with what the final text delivers. A second, independent way of measuring the same campaign is to track raw threat exposure: how dangerous each provision looked when the Commission's proposal was published in 2023, and how much of that danger remains in the Directive as adopted. ECTAA's own internal threat assessment, scored from 0 (no risk) to 10 (maximum threat) on each of the nine priority issues, tells a consistent story from a different angle.

¹³ Art. 22 of Directive 2015/2302, as amended. Directive (EU) 2026/1024 of the European Parliament and of the Council of 29 April 2026 amending Directive (EU) 2015/2302 to make the protection of travellers more effective and to simplify and clarify certain aspects of that Directive, OJ L, 2026/1024, 8 May 2026. <https://eur-lex.europa.eu/eli/dir/2026/1024/oj/eng>

¹⁴ New Art. 12a of Directive 2015/2302. Directive (EU) 2026/1024 of the European Parliament and of the Council of 29 April 2026 amending Directive (EU) 2015/2302 to make the protection of travellers more effective and to simplify and clarify certain aspects of that Directive, OJ L, 2026/1024, 8 May 2026. <https://eur-lex.europa.eu/eli/dir/2026/1024/oj/eng>

Threat Neutralised: PTD Risk Before and After ECTAA's Campaign

Self-assessed threat level per topic (0 = no risk, 10 = maximum threat) — 2023 proposal vs. final Directive (2026)



Source: ECTAA internal threat assessment, 2023–2026

Figure 1. PTD threat level by topic, 2023 proposal vs. final Directive (2026). Source: ECTAA internal threat assessment.

The two shapes make the campaign's overall effect visible at a glance: the red outline, tracing the risk profile of the original proposal, towers over the green shape that remains today. Aggregated across all nine issues, the total threat score fell from 69 to 13 — an 81% reduction — achieved entirely through the strategy, institutional engagement and topic-by-topic advocacy described in the rest of this report.

Scoring the result: how good is 80%?

In consumer protection, policymakers often seek to strike a balance between the interests and demands of consumer organisations and those of industry stakeholders. As a result, policy outcomes are frequently a compromise, with neither side achieving all of its objectives. Against this backdrop, securing more than half of the proposals set out in a text could reasonably be regarded as a very satisfactory outcome.

Scoring each of the nine issues above (clear win = 100%, mostly won = 85%, partial win = 50%, unresolved = 10%) and weighting them equally gives ECTAA a result of roughly 80% — the top of the range the Secretariat itself estimates (75–80% of its documented demands secured), plus all three of ECTAA's top strategic priorities (prepayments, scope simplification, and containment of new cancellation triggers) substantially achieved. That is an excellent result by the normal standards of the profession.

It is also worth being precise about what “partial” and “mostly” mean here in practice, not just on paper. The 24-hour package rule, for example, was the product of a genuinely hard-fought compromise between Parliament and Council — but as adopted, a trader only risks automatic package creation if it fails to give the traveller the required non-package information. A compliant business that simply discloses correctly avoids the trap altogether, which makes this, in practical terms, close to a full win rather than a marginal one.

“The strongest evidence of influence is issue alignment. ECTAA's repeated asks, public positions, member mobilisation, coalition letters, amendment comments and press engagement show a high degree of congruence with the final institutional outcome on every one of the sector's most contested provisions.”

5. What This Would Have Cost without ECTAA

Modelled estimate — not a vendor quote

Public-affairs retainers and fee structures are not publicly disclosed beyond broad EU Transparency Register bands, so the figures below are a modelled estimate built from general Brussels market benchmarks (boutique retainers of roughly €5–10k/month, mid-to-large consultancy retainers of roughly €12–25k/month, senior consultant hourly rates in the region of €150–500+), not a specific vendor's rate card.

Modelling this campaign as if it had been bought from an external Brussels public-affairs consultancy — a 2–3 persons account team (senior director, policy/legal consultant, communications support) scaled to the intensity of each legislative phase — gives a plausible total of roughly €1.1–1.5 million over six years, concentrated in the 2023–2025 period when the file was most active. One-off items such as infographics, leaflets, podcast production and EP workshop logistics would typically add another €50–100k across the campaign.

Period	Est. annual cost	Why
2020–2022 — positioning & crisis response	€120–160k / yr	Small senior-led account team; expert-group and Commissioner-level engagement.
2023 — proposal published	€190–250k/ yr	Team scales up for hearings, press response, initial position papers.
2024 — Council phase	€190–250k/ yr	Full account team; coalition management; sustained Presidency engagement.
2025 — Parliament & trilogue	€190–250k/ yr	Peak intensity: shadow-rapporteur outreach, amendment analysis, comms campaign.
2026 — closing & transposition prep	~€200k	Tapering engagement as the file moves to national transposition. Involvement of National Consultancy.

This is, deliberately, a conservative, well-sourced order of magnitude rather than a precise figure — the point for members is simple: this level of sustained, senior, technically credible engagement is normally a seven-figure undertaking, and ECTAA delivered it in-house, funded by member contributions, at a fraction of what an external campaign of equivalent scale and duration would have cost.

6. What Remains, and Closing

No campaign secures everything, and ECTAA has been open with members and policymakers alike about the two issues still open: the pandemic showed that airline state aid (€31.8bn) dwarfed package-organisier aid¹⁵ (€2.9bn) with no explicit passenger-reimbursement condition attached, and the final text still allows Member States to regulate down payments nationally — a fragmentation risk ECTAA flagged as soon as the Parliament vote confirmed the wider deal. These are now the headline items on ECTAA's forward agenda, not afterthoughts.

With the 28-month transposition window¹⁶ now running, ECTAA's priorities are to prevent national prepayment caps from quietly recreating the EU-wide limitation we removed; to develop practical guidance on the new Article 5a non-package labelling mechanism; to secure workable national insolvency-calculation rules; to push for faster B2B supplier-refund practice; and to keep pressing, in parallel, on airline insolvency protection and passenger-rights reform. The full list of transposition priorities is in Part Two, Section 16.

If we take a take a step back, though, the overall picture is unambiguous. ECTAA secured all three of its top strategic priorities and roughly 80% of its documented demands — a strong result set against any realistic benchmark for EU legislative influence — achieved through nearly 80 documented actions, sustained over six years, on a file that structurally disadvantaged our sector from the outset (Section 7) and that, for a critical stretch of the process, gave ECTAA far less direct access to the Commission and the rapporteur than it needed (Section 9). Every figure in this report represents time invested on behalf of the 80,000 travel agents and tour operators ECTAA represents — and, as Section 5 sets out, a level of engagement that would plausibly have cost well over a million euros to buy from an external Brussels consultancy. This is precisely the return members should expect on their investment in ECTAA, and precisely why that investment is worth renewing.

¹⁵ European Court of Auditors, Air passenger rights during the COVID-19 pandemic: Key rights not protected despite Commission efforts, Special Report 15/2021, 2021 (paras 55-61, Annex IV). <https://op.europa.eu/webpub/eca/special-reports/passenger-rights-15-2021/en/>

¹⁶ Art. 3 of the amending directive (transposition deadline 28 months after entry into force, application six months later). Directive (EU) 2026/1024 of the European Parliament and of the Council of 29 April 2026 amending Directive (EU) 2015/2302 to make the protection of travellers more effective and to simplify and clarify certain aspects of that Directive, OJ L, 2026/1024, 8 May 2026. <https://eur-lex.europa.eu/eli/dir/2026/1024/oj/eng>

PART TWO

Detailed Report

Strategy, story and evidence — the complete campaign record for members who want the detail

7. The Structural Challenge, in Full

The revision of the Package Travel Directive was never going to be an easy file for travel agents and tour operators — and that had little to do with any single provision in the Commission's proposal.

Two structural features of the file shaped the entire six-year campaign that follows. First, the PTD is consumer law, not transport law: it is written and negotiated with a different institutional logic, and a different set of default assumptions, than the legislation that usually governs our sector. Second, precisely because it is consumer law, the PTD has become a recurring flagship the Commission and Parliament reach for whenever they want to show progress on strengthening travellers' rights — regardless of whether the underlying problem actually originates in package travel. Both dynamics are explained in full below, together with the COVID-19 shock that turned this slow-burning structural disadvantage into an urgent, high-stakes legislative fight.

Package travel as consumer law

Unlike most legislation affecting tourism and transport, the Package Travel Directive is not a transport regulation. It is a consumer-protection instrument, falling under the responsibility of DG JUST rather than DG MOVE or DG GROW. This distinction matters enormously for how the debate unfolds.

Where travel businesses are affected by transport legislation, operational realities and market functioning are generally central to the discussion. The Package Travel Directive, by contrast, is assessed first and foremost through a consumer-protection lens. Legislative discussions have therefore tended to focus on strengthening consumer rights, sometimes without fully weighing the operational and financial consequences for the organisers and intermediaries who have to deliver those rights.

This institutional framing has historically made the PTD one of the most politically sensitive files affecting our sector, and it places organised travel at a structural disadvantage compared with larger transport industries — aviation in particular — which benefit from greater political visibility and more direct access to national administrations.

A frequent vehicle for strengthening consumer protection

The revision must be understood in the broader context of EU consumer policy. Although the Directive applies only to a specific segment of the travel market, it has increasingly become the preferred legislative instrument through which policymakers seek to strengthen the rights of travellers generally — creating an inherent policy challenge for the organised travel sector.

Package travel is already one of the most highly regulated travel products in the European Union. Organisers are subject to extensive pre-contractual information requirements, strict liability rules, mandatory insolvency protection, comprehensive cancellation and refund obligations, and a wide range of consumer rights that do not apply to many standalone services. As a result, there is often a tendency during legislative reviews to address new consumer concerns by adding further obligations to the PTD, rather than considering whether similar issues should be addressed across the wider travel ecosystem. This makes package travel and consumer protection a particularly visible and accessible area for EU consumer advocates to pursue further protections.

This dynamic is reinforced by the structure of the industry itself. The PTD primarily affects travel organisers and intermediaries — a sector composed largely of SMEs with comparatively limited lobbying resources when measured against larger transport industries such as aviation. Unlike airlines, the organised travel sector has fewer opportunities to shape the political narrative surrounding major legislative initiatives. Revising the PTD can therefore be perceived as a relatively straightforward way of demonstrating that travellers' rights have been

strengthened, while the practical and financial consequences fall disproportionately on one of the smallest actors in the travel value chain.

This tendency became particularly apparent after COVID-19. The refund crisis affected travellers across all travel sectors, yet the political response focused heavily on revising the PTD, despite package organisers themselves frequently being unable to reimburse travellers because they were awaiting refunds from underlying suppliers, particularly airlines. Public financial support measures adopted during the crisis did not always place travel organisers on an equal footing with other parts of the travel industry: the European Court of Auditors later found that airline state aid during COVID-19 reached¹⁷ €31.8 billion against just €2.9 billion for package organisers, with none of the 38 airline state-aid cases reviewed explicitly including passenger reimbursement as an objective or condition. The fact that another Directorate General was in charge of the enforcement (DG MOVE, in charge of transport, more industry focussed), contributes to this disparity. This disparity was also influenced by the fact that enforcement fell under another Directorate-General, DG MOVE, whose mandate is primarily focused on transport and industry-related matters, not consumer/passengers.

At the same time, the Commission was clear that, notwithstanding the unprecedented disruption and dysfunction experienced by the travel industry during the pandemic, COVID-19 could not be allowed to result in any lowering of consumer protection. While this position was not without justification, it also illustrates the difficulty faced by the industry in making its case: when the policy starting point was that consumer protection should be maintained or strengthened despite the crisis, it became considerably harder to argue that the experience of COVID-19 called for a more balanced allocation of obligations and risks across the travel value chain.

For ECTAA, ensuring that the PTD did not become the default fix for problems originating elsewhere in the value chain was therefore one of the campaign's central, recurring objectives — and remains one of its live priorities today (see Section 16).

The COVID-19 catalyst

The Commission's intention to act on prepayments became evident early. At ECTAA's Gala Dinner in Brussels in 2020, Commissioner Reynders publicly identified advance payments as an area requiring reform; by his intervention at ECTAA's 60th anniversary event and conference in November 2022, he referenced a system inspired by the German approach to prepayments. From that point on, some form of limitation on advance payments looked politically inevitable — despite ECTAA's early and repeated warnings about the evidence base and the operational consequences for SMEs.

ECTAA also raised concerns, from the outset, that the Commission's evidence base relied on limited market data and did not adequately reflect the diversity of business models across Europe. These concerns were partly validated when the Commission's own impact assessment received a negative opinion from the Regulatory Scrutiny Board before being revised¹⁸ and resubmitted — independent confirmation of gaps that ECTAA had already flagged. Despite this, the Commission adopted its proposal on 29 November 2023 with many of its original, most problematic objectives still intact.

The procedure and negotiations afterwards proved that initial assessment by ECTAA on the weaknesses of the proposal were correct.

¹⁷ European Court of Auditors, Air passenger rights during the COVID-19 pandemic: Key rights not protected despite Commission efforts, Special Report 15/2021, 2021 (paras 55-61, Annex IV). <https://op.europa.eu/webpub/eca/special-reports/passenger-rights-15-2021/en/>

¹⁸ Regulatory Scrutiny Board opinions of 7 July 2023 (negative) and 28 September 2023 (positive with reservations), referred to in the impact assessment accompanying the proposal. European Commission, Proposal for a Directive of the European Parliament and of the Council amending Directive (EU) 2015/2302 to make the protection of travellers more effective and to simplify and clarify certain aspects of that Directive, COM(2023) 905 final, 29 November 2023. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2023%3A905%3AFIN>

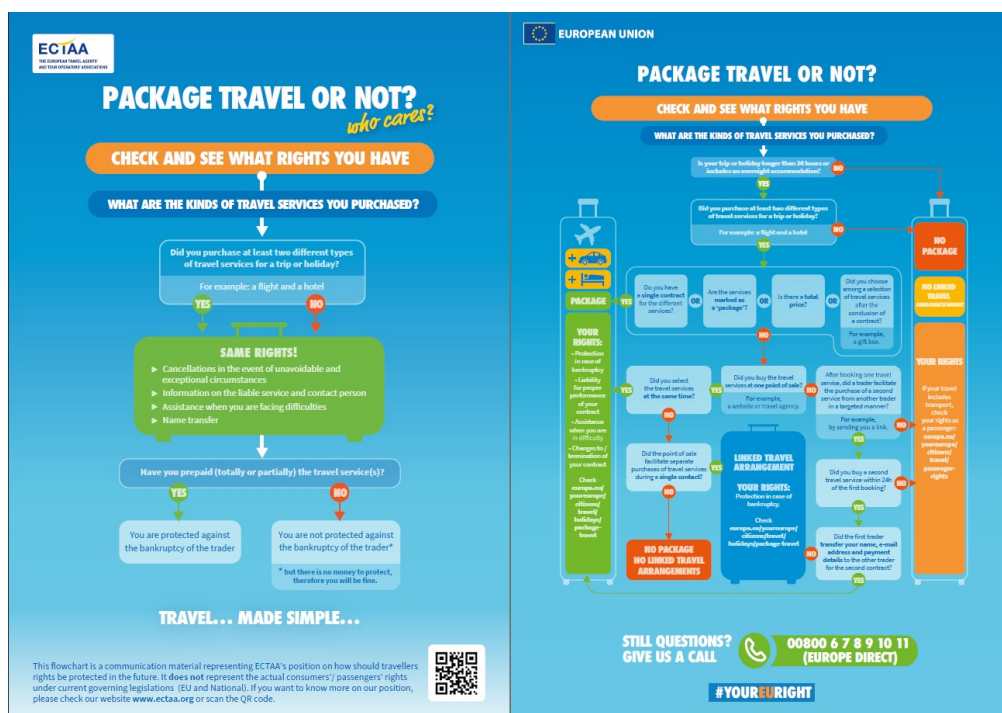
8. Building the Strategy: Anticipation and Reaction

Two faces of the same coin: a long-term strategy that got ahead of the revision, and a real-time capability that protected it once the text was moving. This section tells both halves together, in the order they actually happened — from the 2019 strategy, through the Expert Group phase and the COVID-19 crisis, to the reactive capability that carried the campaign into the Council and Parliament chapters that follow (Section 9).

Anticipating the revision before it was announced

Although COVID-19 became the catalyst that pushed the Package Travel Directive onto the legislative agenda, ECTAA's strategic reflection began well before the crisis. As early as 2019, feedback from member associations flagged growing concerns about the practical implementation of the 2015 Directive: while it had modernised the legal framework, several provisions — particularly the definitions of packages and Linked Travel Arrangements — had introduced unnecessary complexity and legal uncertainty for both businesses and consumers.

At the same time, one of ECTAA's longstanding objectives remained unresolved: a more level playing field between package travel and standalone travel services, in particular through insolvency protection for airlines and other providers taking advance payments. Recognising that the Commission was likely to review the Directive during the new institutional mandate, the Secretariat proposed that preparations begin well before any formal proposal existed. At the Board meeting held in Ras Al Khaimah in December 2019, the Secretariat presented a long-term advocacy strategy built around two guiding principles — simplification and a level playing field — designed to position ECTAA ahead of the revision rather than reacting to it. That early vision was more ambitious than the reforms ultimately pursued, but it proved invaluable: it established the strategic DNA that would guide ECTAA throughout the campaign that followed.



Source ECTAA, 2019

Reading the signals: the Expert Group phase (2018–2022)

The Commission's own PTD Expert Group had existed since 12 June 2018¹⁹, sitting under DG JUST and tasked with helping the Commission gather evidence on application challenges, stakeholder awareness and the state of the market — it would not formally close until 20 December 2024. ECTAA was a consistent participant throughout, with the activity log recording expert-group meetings and consultation rounds in November 2020, February and March 2022, alongside dozens of PTD Working Group sessions inside ECTAA to prepare its own positions for each round. The Commission's click-through report of June 2019²⁰ and its application report of March 2021 — the two documents that formed the evidence base for the eventual revision — were themselves built on this expert-group work and on a targeted stakeholder consultation that drew more than 200 responses.

It was through this channel that ECTAA identified, well before any formal proposal existed, that the Commission's political intent on prepayments was running ahead of its evidence. Commissioner Reynders signalled interest in restricting advance payments during his speech at ECTAA's 60th anniversary Gala Dinner in Brussels as early as November 2021 and was explicit about a German-style model— in both cases, well before the Commission had published the analysis to support such a measure. Throughout the preparatory phase, ECTAA repeatedly warned that the policy discussion was becoming disproportionately focused on prepayments despite the absence of conclusive evidence that restricting them would improve consumer outcomes, and that the underlying market data was too thin to reflect the diversity of business models across Europe.

That warning was subsequently validated by an independent authority: the Commission's own impact assessment received a negative opinion from the Regulatory Scrutiny Board and had to be substantially revised and resubmitted²¹ before the proposal could proceed. For ECTAA, this was independent confirmation, from inside the Commission's own quality-control process, of exactly the evidence gaps the Secretariat had been flagging for two years. Despite this, the Commission adopted its proposal on 29 November 2023 with many of its original, most problematic objectives still intact — which is precisely why the campaign's centre of gravity now shifted to the Council and Parliament.

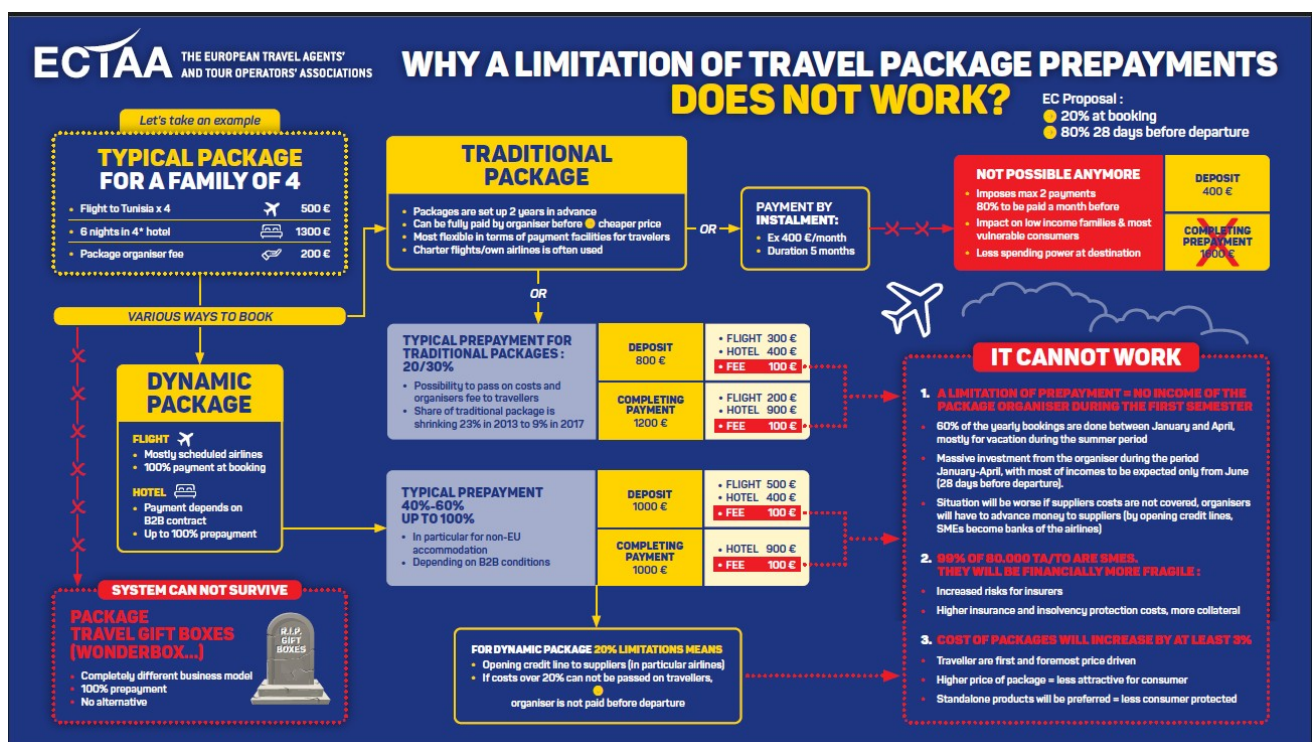
¹⁹ European Commission, Register of Commission expert groups and other similar entities (Package Travel Directive Expert Group, 12 June 2018 - 20 December 2024). <https://ec.europa.eu/transparency/expert-groups-register/>

²⁰ See also the June 2019 click-through report, available on the Commission website. European Commission, Report to the European Parliament and the Council on the application of Directive (EU) 2015/2302 on package travel and linked travel arrangements, COM(2021) 90 final, 26 February 2021. https://commission.europa.eu/document/download/68c2a885-b91c-47e3-ac31-f36669241f47_en

²¹ Regulatory Scrutiny Board opinions of 7 July 2023 and 28 September 2023. European Commission, Proposal for a Directive of the European Parliament and of the Council amending Directive (EU) 2015/2302 to make the protection of travellers more effective and to simplify and clarify certain aspects of that Directive, COM(2023) 905 final, 29 November 2023. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2023%3A905%3AFIN>



Source: EUTT/ECTAA 2022



Source: ECTAA 2023

From long-term reform to crisis management

The 2019 strategy was rapidly overtaken by events. Within months, the insolvency of Thomas Cook and then the COVID-19 pandemic transformed the political and regulatory landscape. Questions that had barely featured in the previous PTD revision — the practical limits of “Unavoidable and Extraordinary Circumstances,” the interaction

between cancellation refunds and insolvency, the sheer scale of simultaneous claims — became central almost overnight.

As borders closed and public-health measures changed by the week, organisers faced successive waves of cancellations without knowing whether departures months away would ever operate. They remained legally obliged to refund travellers within statutory deadlines, even as suppliers — airlines above all — suspended or delayed their own reimbursements to organisers. Consumer money stopped flowing back through the chain, leaving organisers holding the legal liability without the funds to meet it.

ECTAA recognised early that strict enforcement of the existing refund rules risked triggering a second crisis: a wave of otherwise-viable business insolvencies that would, ironically, have undermined the very consumer protection the rules were meant to guarantee. ECTAA therefore took a leading role advocating temporary voucher schemes at EU and national level — not to deprive travellers of their rights, but to preserve the liquidity needed to keep viable businesses alive until travel resumed. Following sustained advocacy from ECTAA and its members, 18 Member States adopted or tolerated voucher-based emergency measures²², providing crucial short-term liquidity and demonstrating, in real time, that the existing Directive lacked the flexibility a systemic crisis demands.

As the pandemic continued past the initial expectation of a summer 2020 recovery, ECTAA's advocacy broadened further, pushing for faster and more effective State aid mechanisms and for clearer, more coordinated EU crisis-management tools. By the time the Commission formally launched the PTD revision, ECTAA's priorities had evolved from simplification and a level playing field alone to a wider agenda: clearer cancellation rules in exceptional circumstances, more balanced B2B refund obligations, stronger and more coherent insolvency protection, effective crisis tools, and ultimately a Directive that protects travellers without undermining the businesses that deliver that protection.



ECTAA
THE EUROPEAN TRAVEL AGENTS'
AND TOUR OPERATORS' ASSOCIATIONS

**REVISION OF
THE PACKAGE
TRAVEL
DIRECTIVE**

ECTAA REVISION OF THE PACKAGE TRAVEL DIRECTIVE

**REVISION OF THE PACKAGE TRAVEL DIRECTIVE
SUMMARY OF ECTAA POSITION**

NO LIMITATION ON ADVANCE PAYMENT SHOULD BE INTRODUCED FOR PACKAGE TRAVEL (NEW ART. 5A)

1. The refund problems faced by consumers during COVID 19 were mainly due to the lack of refund in the whole travel value chain, especially for individual flights.
2. The limitation of prepayment is an additional obligation on top of the insolvency protection and various other guarantees that a package organiser already has to provide (e.g. securities for the sale of tickets and for credit card companies). Suppliers of standalone services providers (such as hotels or airlines) do not have to provide such protection. Applying the PTD principles of insolvency protection to standalone travels would be a better solution.
3. The most vulnerable consumers will be affected by the two-payment rule, which will limit travellers' ability to pay in instalments (4 or 5 times). This restriction will drive up package prices, weaken the liquidity of travel organisers and will not reduce the cost of insolvency protection. On the contrary, it will further fragilize organisers' liquidities and encourage consumers to choose cheaper, less protected travel alternatives.

PROPOSED CHANGES TO THE DEFINITION OF PACKAGE ARE MORE COMPLEX AND IMPOSSIBLE TO APPLY (ART. 3(2) AND 3(5))

1. The definitions of packages and LTAs are far too complex. Simplification would have been much more welcome and future-proof. This can still be achieved if more is done on passenger rights by providing equivalent protection to consumers at all times.
2. The provisions on packages bought within 3 or 24 hours are impossible to comply with. It clashes with the obligation to provide accurate pre-contractual information in the same PTD. It is impossible to know in advance what service will be sold, as it may change afterwards. Moreover, changing the terms and conditions of the first service after the sale will be confusing and burdensome for consumers.

PACKAGE ORGANISERS ARE NOT INSURERS (TAKING INTO ACCOUNT THE PLACE OF DEPARTURE/RETURN IN THE RIGHT TO CANCEL FREE OF CHARGE) (ART. 12)

1. ECTAA strongly opposes the inclusion of the situation of the place of departure and return as a possible reason for a free cancellation by the consumer. The balance of risks goes too far with this proposal. An organiser is responsible for what is promised and provided for in the contract. In addition, we are entering the field of travel insurance. Package organisers are not insurers and more discussion with the insurance sector to cover the risks that have occurred during Covid 19 should be explored. However, the Package Travel Directive is not the place for such a debate.
2. If such a right is introduced, the B2B refund rules need to be aligned, i.e. all services of the package should be refunded by the suppliers, even those not cancelled by the latter.

3

²² Commission Recommendation (EU) 2020/648 of 13 May 2020 on vouchers offered to passengers and travellers as an alternative to reimbursement for cancelled package travel and transport services in the context of the COVID-19 pandemic, OJ L 151, 14 May 2020.
<https://eur-lex.europa.eu/eli/reco/2020/648/oj/eng>



MAIN AREAS OF CONCERN

1. NEW ARTICLE 5A: LIMITATION OF PREPAYMENTS

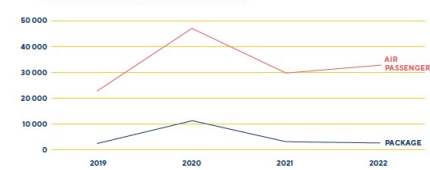
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1. The refund problems faced by consumers during COVID 19 were mainly due to the lack of refund in the whole travel value chain, especially for individual flights.
2. The limitation of prepayments is an additional obligation on top of the insolvency protection and various other guarantees that a package organiser already has to provide (e.g. securities for the sale of tickets and for credit card companies). Standalone service providers do not have to provide such protection. Applying the PTD principles of protection of prepayments to standalone travels would be a better solution.
3. The most vulnerable consumers will be affected by the two-payment rule, which will limit travellers' ability to pay in instalments (4 or 5 times). This restriction will drive up package prices, weaken the liquidity of travel organisers and will not reduce the cost of insolvency protection. On the contrary, it will further fragilize organisers' liquidities and encourage consumers to choose cheaper, less protected travel alternatives.

1.1. PACKAGE TRAVEL IS NOT THE ROOT CAUSE FOR THE LACK OF REFUNDS DURING THE COVID 19 PANDEMIC

In the context of the Covid 19 pandemic, packages were by far less problematic than standalone travel services, in particular flights. Where package organisers were constrained in processing refunds, this was largely due to the refusal or delay on the part of their suppliers to refund (again mostly airlines). There is abundant documentation about the main source of travellers' complaints (Fig 1), the amount of state aids (Fig 2) and whether the grants were actually used for the refund of consumers (Fig 3).

Fig 1: Comparison of cross border complaints received by the European Consumer Centre Network between 2019-2022. Source: Consumer scoreboard 2023¹



Year	Air Passenger (Complaints)	Package (Complaints)
2019	~25,000	~5,000
2020	~45,000	~10,000
2021	~30,000	~5,000
2022	~35,000	~5,000

1. https://commission.europa.eu/document/download/9fca251e-728f-4749-b95d-8854a687832c_en?filename=consumer_conditions_scoreboard_2023%281%29.pdf

Source: ECTAA 2024

The other side of the coin: responding to the legislative process in real time

Everything above was long-range planning. But an equally important part of ECTAA's work, once the formal legislative process was under way, consisted of reacting quickly to developments that no strategy document could have anticipated. The legislative process is inherently dynamic: as negotiations progressed through Council and Parliament, new compromise texts, amendments and drafting proposals regularly emerged — often introducing concepts that had never previously been discussed. Each required a rapid legal and operational assessment of its impact on the sector.

This reactive capacity mattered most during the examination of Council compromise texts and, later, the parliamentary amendment process, when hundreds of amendments were tabled by MEPs. ECTAA established a systematic process to analyse these amendments, assess their practical consequences and provide timely, evidence-based recommendations — covering technical but consequential issues such as ADR rules, complaint-handling mechanisms, penalties and new information obligations. ECTAA also caught provisions that would have been impossible to comply with in practice, such as a requirement for organisers to state the approximate time needed to obtain visas — information controlled entirely by national authorities and subject to constant change.

One particularly valuable tool developed during the parliamentary phase was a comprehensive, structured commentary on all relevant EP amendments, identifying which should be supported, opposed or improved. This gave national associations and political allies a single, consistent analytical framework, keeping advocacy messages coherent throughout the negotiations even as the legislative text itself kept moving.

This ability to combine long-term strategic planning with fast, evidence-based reaction proved essential throughout the revision. While ECTAA's major political objectives stayed constant from December 2019 onward, its capacity to respond quickly to evolving legislative texts meant new regulatory risks were identified and addressed as soon as they emerged — preventing technical provisions from quietly undermining the campaign's broader objectives of simplification, proportionality and legal certainty. Anticipation set the destination; reaction kept the campaign on the road whenever the route changed without warning.



ECTAA Conference Brussels November 2021

9. The Institutional Dialogue: Commission, Council and Parliament

One file, three institutions, three completely different approaches. The Commission's door effectively closed the moment its proposal was published; the Council opened into ECTAA's most productive channel of the whole campaign; the Parliament opened last, and only after ECTAA changed tactics. This section tells the three stories in the order they happened.

A. The Commission: a race to convince, once the doors closed

For as long as the file remained in the Commission's hands, ECTAA had a genuine seat at the table. Commissioner Reynders and his Cabinet met the association repeatedly during the preparatory years, and the Secretariat used every one of those meetings to make the same case, in increasing detail: a mandatory limitation on prepayments was the wrong tool for the problem the Commission was trying to solve. The evidence for it was thin, the real refund failure of 2020 lay upstream with airlines and other suppliers rather than with package organisers, and restricting the businesses that already offered the highest level of consumer protection in EU travel law risked pushing travellers toward less protected alternatives instead of better-protected ones.

The Commission listened — and went ahead anyway. Despite the absence of conclusive evidence, and despite ECTAA's repeated warnings, later echoed independently by the Regulatory Scrutiny Board's own negative opinion on the impact assessment, the Commission adopted its proposal on 29 November 2023 with the prepayment limitation intact. It was, in substance, a political decision dressed as a technical one, and on that specific point ECTAA had lost the argument.

What followed mattered more than the decision itself. Once the proposal was tabled, the Commission's engagement with ECTAA effectively stopped. The meetings and calls that had punctuated the preparatory years — with the Commissioner, with his Cabinet, with DG JUST officials — simply ceased. Rather than continuing to test its reasoning against the industry's evidence, the Commission settled into defending its published text and left the business of negotiating changes to Council and Parliament. ECTAA kept writing, kept publishing analysis, kept making the case in public — but from that point on, it was talking past the Commission rather than with it.

That left ECTAA facing, in effect, a race rather than a negotiation: not a discussion with the Commission that might still move its position, but a contest to convince the two remaining institutions — and the public — that ECTAA's reading of the evidence was the right one, before the Commission's version of events hardened into the default starting point for the rest of the legislative process. That race could no longer be run in Brussels' Commission corridors, because nobody there was still listening. It could only be won by winning over the Council and the Parliament directly — which is exactly where the campaign's centre of gravity shifted next.

B. The Council: building a coalition for balance

Where the Commission proposal had been shaped by a consumer-law logic largely unfavourable to our sector, the Council proved to be where ECTAA's technical arguments first gained real institutional traction.

Following publication of the Commission's proposal, ECTAA adapted its advocacy strategy and increasingly focused its efforts on the Council of the European Union. Working closely with its national member associations, ECTAA mobilised a coordinated campaign aimed at demonstrating the practical consequences of the proposed measures for businesses across Europe — a phase of the campaign that the activity log shows in detail, from the February 2024 meeting with the Belgian Presidency ("Presentation of ECTAA to the chair of the Council in a view to prepare the Council Position") through to the Legal Committee's compromise-text analysis in November 2024.

Successive Council Presidencies, notably Belgium and later Hungary, showed a willingness to engage with the operational realities of the travel sector and to seek more proportionate solutions. Through intensive technical discussions and engagement with Member States, ECTAA was able to demonstrate the risks associated with several key provisions of the Commission proposal.

As a result, some of the most problematic elements of the proposal began to lose support. Mandatory restrictions on prepayments were progressively weakened and ultimately removed. Similar concerns regarding the proposed 3-hour criterion for package qualification gained traction among Member States, which recognised the legal uncertainty and operational complexity that such a provision would create.

The debate surrounding Linked Travel Arrangements proved more nuanced. While ECTAA supported the removal of the LTA category because of its complexity and limited practical value, policymakers remained concerned that its abolition could create a gap in consumer awareness. The compromise eventually developed under the Hungarian Presidency introduced an obligation to clearly inform consumers when a combination of travel services does not constitute a package. ECTAA supported²³ this approach as a pragmatic and proportionate solution that simultaneously increased transparency, simplified the legal framework and reinforced awareness of package travel protection.

By the time the Council and Coreper agreed their negotiating mandate on 18 December 2024²⁴, the Council position had evolved significantly towards a more balanced and workable framework — giving ECTAA, for the first time in the campaign, an institutional ally whose starting position for the trilogue closely matched its own. That advantage would prove essential once the file reached the European Parliament, where ECTAA's path was considerably harder, as the next part of this section shows.

C. The Parliament: winning without the rapporteur

If the Council represented an opportunity, the European Parliament represented a significantly greater challenge — and this is the part of the campaign that best shows ECTAA's ability to adapt under pressure.

Following publication of the Commission proposal in 2023, Alex Agius Saliba was appointed rapporteur²⁵. Throughout much of the legislative process, however, ECTAA experienced considerable difficulty securing meaningful engagement with the rapporteur's office. Despite repeated requests for meetings and dialogue, opportunities to present the sector's concerns directly remained extremely limited.

For a prolonged period, ECTAA's access to the parliamentary process was largely restricted to workshops and public discussions, where opportunities to explain complex technical issues were necessarily limited. Direct engagement with the rapporteur only took place at a very late stage of the process. As a consequence, many of the industry's concerns were not reflected in the rapporteur's initial approach: the Parliament's starting position broadly followed the Commission's logic and generally favoured stronger consumer-protection measures, often without sufficient consideration of proportionality or practical implementation.

The pivot to shadow rapporteurs

²³ New Art. 5a of Directive 2015/2302. Directive (EU) 2026/1024 of the European Parliament and of the Council of 29 April 2026 amending Directive (EU) 2015/2302 to make the protection of travellers more effective and to simplify and clarify certain aspects of that Directive, OJ L, 2026/1024, 8 May 2026. <https://eur-lex.europa.eu/eli/dir/2026/1024/oj/eng>

²⁴ Council of the EU, Package travel, policy page (negotiating mandate, December 2024). <https://www.consilium.europa.eu/en/policies/package-travel/>

²⁵ European Parliament, Legislative Observatory, Package travel and linked travel arrangements: make the protection of travellers more effective and simplify and clarify certain aspects, procedure file 2023/0435(COD). [https://oeil.europarl.europa.eu/oeil/en/procedure-file?reference=2023/0435\(COD\)](https://oeil.europarl.europa.eu/oeil/en/procedure-file?reference=2023/0435(COD))

Faced with this situation, ECTAA adapted. Rather than concentrating efforts exclusively on the rapporteur, advocacy was redirected towards shadow rapporteurs and political groups across the Parliament — a shift that proved significantly more productive. Many shadows demonstrated a greater openness to evidence-based arguments concerning liquidity, legal certainty, administrative feasibility and SME competitiveness. Meetings with MEPs Kokalari, Nesci and Brnjac's office in February 2025, alongside sustained engagement with IMCO staff and RENEW's Cynthia Ní Mhurchú, are documented examples of this redirected effort from ECTAA's activity log.

As a result, numerous amendments reflecting ECTAA's priorities were tabled, particularly regarding prepayments, package definitions and the overall scope of the Directive. While not all were ultimately adopted, they played an important role in shaping the parliamentary debate and strengthening the industry's position ahead of trilogue.

Measuring the impact: amendment alignment by political group

Despite limited access to the rapporteur throughout much of the process, ECTAA succeeded in building broad support among shadow rapporteurs and MEPs from several political groups. The amendment analysis shows that ECTAA's positions were reflected in a significant number of amendments tabled by EPP, Renew, ECR and PfiE members — illustrating that the industry's concerns gained real traction across a wide part of the political spectrum, not just with any single group.

That support was strongest on the issues directly affecting the competitiveness and operational viability of travel organisers: prepayments, package definitions and insolvency protection. On these topics, numerous amendments aligned with ECTAA's recommendations were tabled by multiple political groups, helping shift the parliamentary debate towards a more balanced consideration of both consumer protection and business sustainability. The analysis also confirms that ECTAA's advocacy was not purely defensive: on the replacement of Linked Travel Arrangements with a clearer consumer-information obligation, ECTAA actively supported an innovative solution that improved transparency while simplifying the regulatory framework.

Overall, the amendment exercise demonstrates ECTAA's ability to influence parliamentary discussions despite challenging political circumstances and limited direct engagement with the rapporteur. The breadth of support obtained across political groups significantly strengthened the industry's position during the subsequent trilogue negotiations — turning what began as one of the campaign's hardest problems into one of its clearest demonstrations of resilience.

Conclusion: From political resistance to legislative success

Taken together, the three institutional stories above tell a single narrative of adaptation. ECTAA entered the legislative process facing a Commission whose channel closed early, strong political momentum in favour of additional regulation, and limited initial receptiveness to industry concerns in the Parliament. By building alliances where they were available — above all in the Council — and by redirecting effort the moment one channel proved unproductive — above all in the Parliament — ECTAA helped reshape the debate and secured a significantly more balanced final outcome for the European travel sector than the trajectory of late 2023 would have predicted. Section 11 sets out the coordinated network and the method behind this adaptability in more detail; Section 12 returns to each contested issue in turn to show exactly where that method paid off.

10. A Coordinated Network: ECTAA and Its Members Working as One

One voice in Brussels only carries as far as the twenty-seven capitals that need to hear it too. This section sets out the network behind that consistency - forged during the pandemic - and used at full capacity throughout the PTD campaign.

One of the key factors behind the success of ECTAA's advocacy during the revision of the Package Travel Directive was the close coordination between the Secretariat, the Legal Committee and the national member associations. European advocacy can only be effective if positions developed in Brussels are consistently relayed at national level and, conversely, if national developments and political intelligence are rapidly fed back into the European strategy.

Forged during the pandemic

This methodology did not emerge overnight. It was largely forged during the COVID-19 crisis-management campaign described in Section 8, when the travel sector faced an unprecedented succession of legal, political and operational challenges. In a rapidly evolving environment, frequent exchanges of information became essential. ECTAA significantly increased the frequency of meetings of its Legal and Technical Committees, allowing members to share developments in real time, compare national approaches and rapidly coordinate common positions. This created a culture of continuous dialogue and collective problem-solving that extended well beyond the immediate crisis — the same Legal Committee and PTD Working Group structure that would go on to meet a combined twelve times over the course of the PTD campaign alone (Section 15).

One voice, adapted for every capital

The same working methods were subsequently applied to the revision of the Package Travel Directive. Throughout the legislative process, the Secretariat worked closely with the Legal Committee to analyse legislative developments, identify emerging risks and prepare advocacy positions. These positions could then be discussed, refined and validated quickly by members before being disseminated across the ECTAA network.

This close coordination considerably strengthened the effectiveness of the advocacy campaign. It ensured that ECTAA spoke with one voice while allowing national associations to adapt common messages to their domestic political context — an adaptation visible in the 27 letters that member associations sent in their own name over the course of the campaign (Section 15), each carrying the same underlying position in a form suited to its own government. Feedback from members also enabled the Secretariat to test legal arguments against operational realities, ensuring that advocacy positions remained both technically robust and practically relevant.

Speed: engaging before positions crystallised

Equally important was the speed at which information circulated. As new Council compromise texts, parliamentary amendments or political developments emerged, members were informed rapidly and provided with coordinated analyses, briefing notes and suggested advocacy messages. This enabled national associations to engage their governments and Members of the European Parliament while negotiations were still evolving, rather than reacting after political positions had already crystallised — the network, in effect, was what turned the reactive capability described in Section 8 into action on the ground, in every Member State at once.

The Council pathway: relationships that predated the campaign

The experience gained during the pandemic also proved invaluable in strengthening relationships with national administrations. During COVID-19, member associations had established regular channels of communication with

ministries, consumer authorities and other national decision-makers to address the immediate challenges facing the sector. These relationships remained in place during the PTD revision and significantly enhanced the effectiveness of advocacy at Council level. This was particularly important because the Council's position is primarily shaped through discussions within Member States before negotiations take place in Brussels — which is precisely what made the Council chapter described in Section 9B possible: by the time ECTAA was engaging the Belgian and Hungarian Presidencies directly, member associations were often already a known and trusted voice inside their own capitals. By combining coordinated European advocacy with well-informed national engagement, ECTAA was able to maximise its influence throughout the legislative process.

More broadly, the PTD revision demonstrated the value of ECTAA's network-based approach to advocacy. Rather than relying solely on interventions from the Secretariat, the campaign mobilised expertise and political engagement across the entire membership. This combination of European coordination and national implementation ensured that common positions were developed collectively, communicated consistently and defended simultaneously in Brussels and in the capitals, greatly increasing the credibility and impact of the industry's message. It is also, in a very direct sense, what membership funds: not just a Secretariat that argues on members' behalf in Brussels, but a network that multiplies every position by twenty-seven.

11. Advocacy Method: Six Deliberate Choices

Section 9 showed the campaign moving across three institutions with very different levels of access. What made that adaptability possible was not improvisation: it was a deliberate, six-part method that the Secretariat applied consistently, whichever institution it was dealing with. This section sets that method out explicitly, both as a record for members and as a blueprint for future campaigns.

1. Prioritising the battles that matter most

While the Commission proposal contained numerous problematic provisions, ECTAA deliberately concentrated its political capital on a limited number of strategic objectives: the proposed limitation on prepayments, the redefinition of the Directive's scope, and the revision of cancellation rules. Other issues continued to be monitored through written positions and technical comments, but were kept out of the centre of the political campaign — keeping the message coherent instead of diluting it across too many fronts.

2. Rigorous legal and policy analysis

ECTAA invested heavily in analysing every proposed amendment from both a legal and an operational perspective — not simply flagging provisions the industry disliked, but understanding how they would work in practice and where internal inconsistencies could be demonstrated. Close cooperation between the Secretariat, the Legal Committee and national associations ensured that positions reflected both rigorous legal analysis and operational reality on the ground.

3. Keeping the political message simple

Although the underlying legal analysis was often highly technical, the political messages themselves were kept deliberately simple: delete the mandatory prepayment limitations; delete the three-hour and twenty-four-hour package definitions; delete the Linked Travel Arrangement regime. A concise, consistent message proved far easier to convey to policymakers juggling dozens of files than a series of detailed technical amendments.

4. Holding a clear negotiating position

ECTAA deliberately avoided negotiating against itself, refraining from proposing compromise texts on its principal priorities for most of the process. Where institutions developed their own alternative solutions, ECTAA assessed them on their merits — as shown by its support for the Council's new non-package information obligation once Linked Travel Arrangements were deleted.

5. Building broad coalitions around shared objectives

ECTAA placed greater emphasis on coalition-building than in previous campaigns, aligning with partner organisations around a limited number of shared priorities. Policymakers repeatedly heard the same concerns from different parts of the industry, reinforcing that these were genuine operational issues rather than the interests of a single stakeholder. Section 13 sets out this coalition and communications work in full.

6. Modernising advocacy communication

Technical expertise alone rarely moves political decisions. ECTAA complemented its traditional position papers with a clearer visual identity, simplified infographics, explanatory diagrams, podcasts, short videos and social media campaigns — translating complex policy issues into messages that policymakers, parliamentary assistants and national administrations could grasp quickly.

Taken together, these six choices — paired with the anticipation-and-reaction model described in Section 8 and the coordinated advocacy network described in Section 10 and applied across the very different institutional terrain

described in Section 9 — describe a more strategic advocacy model than ECTAA had used in previous legislative exercises. As EU policymaking grows more complex and more competitive, this experience gives ECTAA a tested blueprint for the legislative campaigns still to come.



Presentation: Actuary Converge Conference November 2024

12. Topic by Topic: The Full Story Behind Each Result

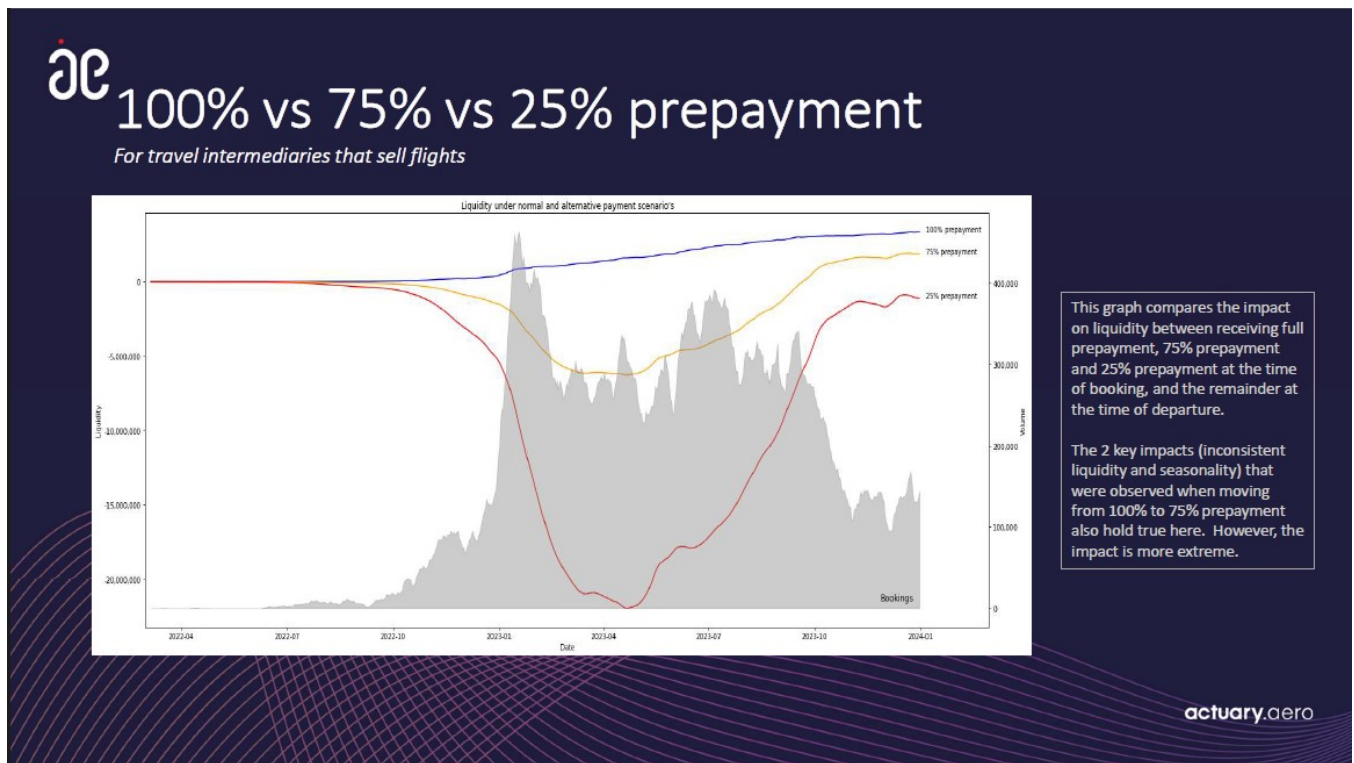
Section 4 gave the scoreboard: nine issues, nine verdicts, one aggregate score. This section is the detail behind that scoreboard, organised by the same major topics ECTAA tracked throughout the campaign — prepayments, the scope of the Directive, cancellation rights and insolvency, and B2B refunds and vouchers. Each topic below sets out ECTAA's ask, how the advocacy strategy evolved as the political situation changed, and exactly how the final result was achieved. Read together with Sections 9–11, this section shows the network, the method and the institutional access described above being applied, issue by issue, to produce the results in Section 4.

Prepayments: from opposition, to damage control, to full removal

Prepayment limitations became the most visible and politically sensitive issue of the entire revision. It carried a simple, powerful narrative — if travellers pay less before departure, less money is at risk if something goes wrong — that was especially hard to counter in the political aftermath of the COVID-19 refund crisis. ECTAA's advocacy evolved in three distinct phases.

At first, ECTAA opposed the measure outright: mandatory prepayment restrictions addressed the symptom of the pandemic refund crisis, not its cause, which was the interruption of reimbursement flows through the travel chain, above all from airlines to organisers. As the political weight behind some form of limitation became clear, the objective shifted to damage control — working to ensure that, if a limitation was introduced, it would remain proportionate to the economic reality of package travel, where organisers routinely commit funds to suppliers months ahead of departure, particularly for peak summer travel.

ECTAA invested heavily in making this financial mechanism understandable to policymakers focused on post-crisis consumer protection: simplified visuals, clearer messaging, dedicated position papers and targeted engagement. As the debate progressed, three weaknesses in the Commission's case became increasingly clear: the evidence base was thin; the proposal addressed only the consumer–organiser relationship while ignoring the real problem of delayed supplier reimbursement; and further restricting the businesses that already deliver the highest level of consumer protection in EU travel law risked pushing travellers toward less-protected, standalone alternatives — the opposite of the intended effect. Through sustained engagement with Member States and MEPs, ECTAA shifted the debate decisively. The final result: no EU-wide prepayment cap in the adopted Directive.



Source: ECTAA/ACTUARY 2024

Scope of the Directive: simplicity restored

The future of Linked Travel Arrangements was not initially one of ECTAA's top priorities — members agreed the concept was rarely used, but its removal was not without trade-offs, since it had acted as a buffer discouraging businesses from structuring transactions to dodge the Directive altogether. That changed the moment the Commission proposed folding part of the LTA concept into entirely new three-hour and twenty-four-hour package definitions never discussed in the expert-group phase. Rather than simplifying the Directive, the proposal made it considerably more complex, and ECTAA's Legal Committee quickly demonstrated why: traders would have had to determine a transaction's legal status — package or not — only after a second purchase, making compliance with pre-contractual information duties a practical impossibility at the moment of the first sale.

ECTAA moved decisively to advocate the deletion of LTAs together with both new time-based definitions, translating this highly technical argument into visual customer-journey illustrations that made the compliance impossibility immediately intuitive for policymakers. The result: both institutions deleted LTAs and the three-hour concept outright. The twenty-four-hour concept proved more resilient, but the Council, under the Hungarian Presidency, developed an elegant alternative that ECTAA strongly welcomed — a new obligation to clearly inform consumers whenever a combination of services does not constitute a package, achieving the same transparency objective through simpler, clearer rules rather than complex new definitions.

Cancellation rights and insolvency: focusing on what was still achievable

Here ECTAA took a different strategic approach. Recent Court of Justice case law — the Tez Tour judgment on unavoidable and extraordinary circumstances²⁶, and the Amlin judgment on the scope of insolvency protection²⁷ — had already settled some of the most contested legal questions. Rather than spend scarce political capital

²⁶ Court of Justice of the European Union, M.D. v "Tez Tour" UAB (Tez Tour), Case C-299/22, judgment of 29 February 2024. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62022CJ0299> Court of Justice of the European Union, QM v Kiwi Tours GmbH (Kiwi Tours), Case C-584/22, judgment of 29 February 2024. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62022CJ0584>

²⁷ Court of Justice of the European Union, Bundesarbeitskammer v HDI Global SE and A, B, C, D v MS Amlin Insurance SE (HDI Global and MS Amlin), Joined Cases C-771/22 and C-45/23, judgment of 29 July 2024. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62022CJ0771>

contesting a jurisprudence the legislator was highly unlikely to reverse, ECTAA accepted these judgments as the new legal baseline and concentrated on preventing additional burdens that went beyond what the case law actually required.

This redirected focus paid off on several fronts. ECTAA successfully opposed granting legal significance to official travel warnings as automatic triggers, opposed extending the assessment of unavoidable and extraordinary circumstances to the traveller's place of residence, and secured a rule that insolvency-refund deadlines run only once a complete reimbursement dossier²⁸ has been submitted — not from an initial, potentially incomplete claim. On the Tez Tour question itself, ECTAA could not persuade legislators to remove the principle that a traveller's personal circumstances may be taken into account when assessing unavoidable and extraordinary circumstances — that was never a realistic ask once the Court had spoken — but it did secure a clearer framing of how and when that test applies, reducing the room for inconsistent interpretation across Member States. The lesson for future campaigns is clear: success does not require contesting every element of a proposal, only identifying, precisely, where political effort is most likely to produce results, and where a narrower, more achievable improvement is the realistic ceiling.

Crisis preparedness: real progress, work still to do

ECTAA consistently argued that refund obligations should be aligned throughout the travel value chain. Package organisers can only refund travellers promptly if the suppliers holding the travellers' money—particularly airlines and other travel service providers—refund organisers within an equivalent timeframe. Throughout the revision, ECTAA therefore advocated for a genuine business-to-business refund mechanism that would address one of the main structural weaknesses exposed during the COVID-19 pandemic.

The final text represents an important step in that direction. Article 22(2) requires travel service providers to reimburse organisers within seven days²⁹ where the provider itself cancels or fails to perform the travel service. Although this solution is more limited than the comprehensive alignment sought by ECTAA, it establishes, for the first time, a mandatory business-to-business reimbursement obligation in EU law. It therefore constitutes a significant improvement in rebalancing the financial relationship between organisers and their suppliers, while maintaining a framework that remains acceptable to the wider travel industry.

The revised Directive also establishes a much more robust framework for the voluntary use of vouchers. Under the new rules, vouchers must at least correspond to the traveller's refund entitlement, remain valid for up to twelve months³⁰ (with the possibility of a single extension by mutual agreement), be redeemable against any travel service offered by the organiser, be transferable once free of charge, benefit from insolvency protection and be automatically reimbursed if they remain unused at the end of their validity period. These provisions considerably strengthen legal certainty for both travellers and organisers whenever vouchers are used voluntarily.

However, the revision stops short of addressing one of the fundamental lessons of the COVID-19 crisis. Despite the experience of 2020, the Directive does not introduce any dedicated crisis-management mechanism allowing temporary flexibility in exceptional, systemic situations. The ordinary fourteen-day refund obligation continues to

²⁸ Art. 17 of Directive 2015/2302, as amended. Directive (EU) 2026/1024 of the European Parliament and of the Council of 29 April 2026 amending Directive (EU) 2015/2302 to make the protection of travellers more effective and to simplify and clarify certain aspects of that Directive, OJ L, 2026/1024, 8 May 2026. <https://eur-lex.europa.eu/eli/dir/2026/1024/oj/eng>

²⁹ Art. 22 of Directive 2015/2302, as amended. Directive (EU) 2026/1024 of the European Parliament and of the Council of 29 April 2026 amending Directive (EU) 2015/2302 to make the protection of travellers more effective and to simplify and clarify certain aspects of that Directive, OJ L, 2026/1024, 8 May 2026. <https://eur-lex.europa.eu/eli/dir/2026/1024/oj/eng>

³⁰ New Art. 12a of Directive 2015/2302. Directive (EU) 2026/1024 of the European Parliament and of the Council of 29 April 2026 amending Directive (EU) 2015/2302 to make the protection of travellers more effective and to simplify and clarify certain aspects of that Directive, OJ L, 2026/1024, 8 May 2026. <https://eur-lex.europa.eu/eli/dir/2026/1024/oj/eng>

apply³¹ regardless of the scale of the disruption, even where refunds cannot realistically flow back through the travel supply chain.

Similarly, the revised Directive contains no provisions recognising the role that public financial support played in preserving both businesses and consumer protection during the pandemic. The COVID-19 crisis demonstrated that extraordinary events may require exceptional liquidity measures, whether through coordinated State aid, temporary financial instruments or other emergency mechanisms. Yet these lessons have not been incorporated into the legislative framework. As a result, while the revised Directive improves several aspects of the refund system, it remains largely designed for isolated business failures rather than systemic crises affecting the entire travel sector.

13. Coalition-Building and the Public Campaign

The lesson had been learned the hard way, a decade earlier.

During the 2013–2015 revision that produced the current Directive, different parts of the travel value chain pursued largely separate agendas rather than a common line. The result was a mixed set of measures that left few stakeholders fully satisfied — a cautionary tale ECTAA's Secretariat kept firmly in mind when designing the 2020s campaign. This time, the priority was to speak with one voice wherever possible, and to back that voice with a modern communications operation loud enough to be heard. Both are set out below.

ECTAA's campaign was never a solo effort, and it was never limited to technical papers submitted behind closed doors. Two features distinguished this campaign from previous ones: the scale of coalition work, and the modernisation of ECTAA's public communications.

³¹ Art. 12 of Directive 2015/2302, as amended. Directive (EU) 2026/1024 of the European Parliament and of the Council of 29 April 2026 amending Directive (EU) 2015/2302 to make the protection of travellers more effective and to simplify and clarify certain aspects of that Directive, OJ L, 2026/1024, 8 May 2026. <https://eur-lex.europa.eu/eli/dir/2026/1024/oj/eng> Court of Justice of the European Union, Union fédérale des consommateurs - Que choisir and CLCV v Premier ministre and Ministre de l'Économie, des Finances et de la Relance (UFC-Que choisir), Case C-407/21, judgment of 8 June 2023. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62021CJ0407>



LET'S TAKE THE TIME

TO MAKE MEANINGFUL,
HARMONISED, AND
MEASURED IMPROVEMENTS

TO TOURIST RIGHTS

Source: Ectaa LinkedIn 2024

Coalition-building

ECTAA worked consistently through the PTD coalition — recorded stakeholder meetings run from March 2024 through to the closing months of the trilogue in mid-2025 — aligning industry partners around a small number of shared, high-priority objectives, principally prepayment limitations and the package definitions. This alignment strengthened the credibility of the sector's message: policymakers repeatedly heard the same concerns from different parts of the industry, reinforcing that these were genuine operational realities rather than the isolated interests of a single association, while giving national associations a consistent line to relay to their own governments.

This work was echoed at institutional level. The European Economic and Social Committee's opinion of 24 April 2024³² called the revision timely and necessary, welcomed the removal of overlap between packages and LTAs, and explicitly warned that refund timelines needed to better reflect cash-flow constraints in exceptional situations — language that closely tracks the proportionality argument ECTAA had been making since its March 2024 position.

ECTAA THE EUROPEAN TRAVEL AGENTS' AND TOUR OPERATORS' ASSOCIATIONS

LIMITATION OF PREPAYMENTS: VIEWS OF TUI, EXPEDIA, AIRFRANCE - KLM

FOREWORD

The COVID 19 pandemic has severely hit the travel industry, bringing it to a halt and questioning the legal framework in which this industry is operating. It is however fair to acknowledge that the ecosystem can be designed to prevent all unexpected events. Therefore, in a context of recovery, the resilience of the travel industry has to remain a priority in the interests of the companies, the employees and the customers.

On 21 March, ECTAA co-organised a workshop in the European Parliament with the support of MEP Iratxe Urdal. The purpose of this meeting was to present, with various representatives of the tourism value chain (tour operators, online travel agents, airlines) the payment flows in the travel industry to MEPs, Permanent Representatives and interested parties and enter a dialogue with them.

You will find hereafter the main takes of that discussion.

TUI

TUI is the world's largest integrated tourism company, serving around 27 million customers in more than 150 countries. TUI covers a wide range of activities including tour operating, cruises, airlines and hotel management. TUI has therefore a unique and global view on the payment cycles in the tourism value chain.

- Prepayments allow advantageous rates on the room and the flight for the consumers while also securing the needed capacities for the high season, again benefiting the consumer.
- Prepayments obtained from consumers are reinvested into the entire tourism ecosystem, both in source and destination markets.
- Prepayments are passed on to hotels, who use them to maintain and upgrade their facilities before the season, as well as to retain and hire staff.
- Prepayments are also used to secure additional flight capacity for the summer, and to perform the intense winter maintenance on TUI's own planes.
- Third party travel shops receive an advance on their commission.

Expedia

Expedia is a leading online travel agency. Expedia does not own the services it intermediates and only offers real time, dynamic packages from a wide variety of suppliers.

- Consumers will choose the different services on the website and then pay in full at the checkout.
- Expedia bundles certain products and gets more favourable prices from the airlines or hotels if they are bundled.
- Suppliers have to be paid within a couple of days.
- This money is reinvested by the services suppliers to cover their fixed costs and maintain the fleets or facilities at the destination during low season.
- Expedia therefore does not hold the money.

AIRFRANCE KLM GROUP

Air France - KLM is a major leading European airline, member of SkyTeam. The group is the result of a merger between two airlines: Air France and KLM.

- Airlines business model is based on the management of the capacity of their planes.
- At least 90% of a plane need to be filled to be profitable.
- Pricing in airline industry is a precarious balance between attractive prices to fill the capacity and high prices to be profitable.
- Prepayments are necessary to ensure travellers' commitment, which in turn guarantees the plane occupancy.

CONCLUSION

Prepayments are a vital part of the tourism business model. Limiting them in the Package Travel Directive would have adverse consequences ...

... FOR INTERMEDIARIES

- Package travel sector is highly competitive and functions on very low profit margins.
- Limiting them will eventually lead to a riskier financing scheme and higher prices for consumers.
- Higher prices will drive consumers to opt for loose and component-based travel, less protected than package travel.
- Competitive disadvantage for EU undertakings when they operate outside of the EU market.
- It would particularly hit an industry comprised of 80% by SMEs and drive many of them out of the market.

... FOR AIRLINES

- Prepayment ensures that passengers commit to their booking, otherwise they could cancel at any time.
- Flights can't be empty. It is difficult to fill a plane at last minute because prices are higher and time is scarce.
- The only solution to lower the 90% capacity threshold is to increase prices.
- Less passengers on an airplane = more carbon emissions and higher environmental impact.

Source: ECTAA 2024

³² European Economic and Social Committee, Revision of the package travel directive, opinion INT/1049-EESC-2023-05478, 24 April 2024.

<https://www.eesc.europa.eu/en/our-work/opinions-information-reports/opinions/revision-package-travel-directive>

Modernising the public campaign

ECTAA's public communications intensified sharply once the parliamentary phase began. On 27 February 2025, ECTAA publicly described the Parliament draft report as “staggering and disconnected” from industry realities, criticising the legal uncertainty created by expanded time-based definitions and warning that prepayment restrictions would weaken organisers without solving the real refund problem. Following the plenary vote on 11 September 2025, ECTAA welcomed the progress made while flagging the risk of national prepayment fragmentation and continuing legal uncertainty around the 24-hour definition, calling directly on trilogue negotiators to fix these points before the deal was closed.

This public advocacy was reinforced by a modernised communications toolkit: a dedicated LinkedIn and Twitter campaign targeting the Council of Ministers in spring 2024, a further LinkedIn campaign aimed at

IMCO members in the run-up to the committee vote in 2025, an “Inside Travel & Policy” podcast episode featuring ECTAA Ambassadors discussing the operational stakes of the revision for SMEs, and a series of infographics and leaflets translating complex legal arguments into messages that any parliamentary assistant could grasp in thirty seconds. Throughout, ECTAA's message stayed remarkably consistent — from the March 2024 position through the press releases of February, September and December 2025 and March 2026: keep high traveller protection, but make the rules operational for the SMEs and intermediaries who make up the vast majority of the sector.

That consistency let ECTAA speak credibly both as a technical expert and as the recognised voice of 80,000 travel agents and tour operators across Europe — a dual credibility that shows clearly in how closely the final legal text tracks ECTAA's repeated public asks.



14. Putting the Industry in the Room

Positions submitted on paper only carry so far. From early on, ECTAA also worked to get MEPs, Commission officials and industry into the same room, and to do so repeatedly rather than once.

The first such event, held in Brussels in October 2021 together with EU Travel Tech, set a pattern that continued through the most intensive years of the file: a further EUTT event the following April, an EGFATT-ECTAA event in May 2022 dedicated specifically to insolvency and prepayments, and a joint event with Germany's DRV that October. Each pairing brought a different partner and a different institutional audience into the room, but carried the same underlying message, reinforcing in person the consistency that also defined ECTAA's written positions.

As the file moved into the European Parliament, this convening effort moved with it. An EP event on payment terms across the PTD value chain, held in April 2023 and prepared jointly through the PTD coalition, gave ECTAA a platform to make its prepayment argument directly to MEPs rather than only in writing. Formal presentations followed at the EP Hearing in October 2023 and the IMCO Hearing in December 2023, the latter prepared in close coordination with TUI and EU Travel Tech to ensure the industry's position landed as one voice rather than several.

Where ECTAA could get into the room on its own terms, it made the most of it — a useful reminder, set against Section 9C, that convening power only works when the host wants a real conversation, and that ECTAA's own events, where it controlled the format, consistently delivered more than the ones it did not.



16. Transposition Priorities in Detail

Winning the legislative text is not the end of the campaign — it is the point at which the campaign changes venue, from Brussels to 27 capitals.

The final adoption of the directive at EU level does not mean the work is over for ECTAA.

With the 28-month transposition window now running, ECTAA's next phase of work focuses on ensuring a smooth and harmonised transposition at national level.

Priorities for members over the coming period are:

- Prevent national prepayment caps from quietly recreating, Member State by Member State, the EU-wide limitation that was successfully removed at EU level.
- Develop model wording and practical guidance for the new Article 5a non-package labelling mechanism and 24-hour booking scenarios.
- Support proportionate national insolvency-protection calculations that properly account for seasonality, peak holdings and genuine risk.
- Secure national interpretations of the B2B supplier-refund rules that let organisers recover money quickly where a supplier cancels or fails to perform.
- Maintain the link to the parallel passenger-rights reform agenda, especially airline insolvency protection and refund redress — the unfinished half of the value-chain argument.
- Prepare practical, member-facing templates for complaint handling, voucher information, non-package notices and insolvency information.

Annex 1 — Full Activity Log, 2020–2025

The full, chronological record of ECTAA's documented advocacy actions on the Package Travel Directive between March 2020 and August 2025, compiled from ECTAA's internal activity tracking. This is the underlying evidence base for every figure presented in this report.

Date	Action	Objective	Involved
March 2020	ECTAA Legal Committee	Taking stock of impact Covid 19 before lockdown	ECTAA- Bischoff Everding
March 2020	Call BEUC ECTAA	PTD/Covid 19/voucher	ECTAA-BEUC
April 2020	Call with Commissioner Reynders	Conference call on PTD	ECTAA-EGFATT-EUTT-BEUC
July 2020	PTD Working group meeting	Preparing the ECTAA position	ECTAA
September 2020	PTD Working group meetings	—	ECTAA
October 2020	PTD Working group meeting	—	ECTAA
November 2020	Call DG Just	Presentation Commission report	ECTAA- Mentre
November 2020	Meeting with Commissioner Reynders	ECTAA 60th anniversary	ECTAA- Reynders
November 2020	EC PTD Expert Group	Exchange of views on PTD and Covid	stakeholders
December 2020	Meeting with DG Grow	Presenting ECTAA position to EC Comments on PTD	ECTAA-Holowska
March 2021	Call BEUC/ECTAA CRS/PTD	Preparing the Commission proposal	ECTAA-BEUC
March 2021	Call with Cabinet Reynders	—	ECTAA- Perignon et Van Ormelingen
March 2021	Call with Commissioner Reynders	—	ECTAA- Reynders
June 2021	PTD Position International dimension	—	ECTAA
July 2021	Call with Commissioner Reynders	call with Commissioner Reynders	ECTAA-EUTT-Expedia-Sunweb-Edreams- Odigeo
August 2021	PTD Working group	Preparing the ECTAA position	ECTAA
September 2021	Informal meeting with Commissioner Reynders	First information about limitation of prepayment by Commissioner	ECTAA-IATA
October 2021	PTD event in Brussels	—	ECTAA-EUTT
December 2021	PTD Working group	Draft Consultation Review	ECTAA
December 2021	Article in Juristourisme	Article on PTD in COVID time	Public
February 2022	ECTAA Legal Committee	Draft Consultation Review	ECTAA
February 2022	PTD Working group	—	ECTAA -
February 2022	PTD Consultation	—	ECTAA
March 2022	PTD Action Plan	aligning ECTAA -EUTT activities	ECTAA-EUTT

Date	Action	Objective	Involved
March 2022	PTD Working group	—	ECTAA
March 2022	Call PTD Expert group	Preparing the industry position	ECTAA-EUTT
March 2022	EC PTD Expert Group	Preparing the Commission proposal	ECTAA and other Experts
April 2022	ICF/ECTAA - PTD Study call	Preparing the Commission proposal	ECTAA-ICF
April 2022	Call PTD Event	Exchange with EGFATT	ECTAA-EGFATT
28 April 2022	PTD event in Brussels	Exchange with industry, Commission on PTD	ECTAA-EUTT
April 2022	Publication of ECTAA-EUTT leaflet	Present industry position	ECTAA-ECTAA Inline policy
13 May 2022	EGFATT-ECTAA event	Insolvency/prepayment	public
October 2022	ECTAA-DRV event	Presenting industry position	Public
December 2022	Meeting with Cabinet Reynders	Update on ECTAA positions and latest developments in DG JUST	ECTAA - Cabinet staff
December 2022	Call with Cabinet Breton	Update on ECTAA positions and latest developments in DG JUST	ECTAA-Cabinet staff
April 2023	PTD Infographic	Publication infographic	ECTAA
April 2023	Update on internal Commission developments	—	ECTAA-EUTT
April 2023	Update on internal Commission developments	—	ECTAA-EUTT
April 2023	EP Event on payment in the PTD value chain	Presenting industry views in particular on limitation of prepayment	PTD coalition
October 2023	Call with Cabinet Reynders	—	ECTAA-Isabelle Pérignon
October 2023	EP Hearing on PTD	—	Public
November 2023	Publication Press release on PTD proposal	—	ECTAA
December 2023	Preparing IMCO Hearing	Aligning positions	ECTAA-EUTT
December 2023	Preparing IMCO Hearing	Aligning positions	ECTAA-TUI
December 2023	IMCO Hearing	Presenting ECTAA position	Public
December 2023	Stakeholders meeting	Assessing key provisions and positions	PTD coalition
January 2024	Meeting with Roberts Zile (EP VP)	Discussion on the PTD with ALTA	ECTAA -ALTA
February 2024	ECTAA Legal Committee	Finalising ECTAA Position	ECTAA
February 2024	Meeting Andrew Hillman (Charanzova's Assistant)	—	ECTAA
February 2024	Meeting with Belgian Presidency	Presentation of ECTAA to the chair of the Council in a view to prepare the Council Position	ECTAA
March-May	LinkedIn and Twitter Campaign	to influence Council of Ministers	ECTAA

Date	Action	Objective	Involved
2024			
March 2024	1st Stakeholders meeting	Setup industry coalition	PTD coalition
April 2024	Stakeholders meeting	—	PTD coalition
April 2024	Leaflet	Presentation of ECTAA position on the PTD	ECTAA
May 2024	Stakeholders meeting	Agree an industry wide approach	PTD coalition
1 0June 2024	Stakeholders meeting with Belgian and Hungarian presidencies	Presentation of the Coalition position on PTD to the 2024 presidencies.	PTD coalition
September 2024	ECTAA Legal/Air Matters Committees	—	ECTAA
September 2024	Stakeholders meeting	—	PTD coalition
September 2024	PTD Revision Call	—	ECTAA-IRU
16 Ocotber 2024	Meeting Maria Grapini (VC IMCO)	Intro to PTD	ECTAA
November 2024	Stakeholders meeting	—	PTD coalition
November 2024	ECTAA-Actuary PTD Session	—	ECTAA-Actuary
November 2024	ECTAA Legal Committee	EU Compromise Assessment	ECTAA
05 Dember 2024	Coalition Letter to Commissioner McGrath	Comments on the Council Compromise and renewed concern over the original proposal	PTD coalition
January 2025	Meeting IMCO Staff	Informing EP administrators	ECTAA-Kadri Bruegel and Davide Stellini
January 2025	Stakeholders meeting	Preparing meeting with Ní Mhurchú	PTD coalition
January 2025	Stakeholders meeting on PTD with MEP Cynthia NÍ MHURCHÚ (RENEW)	—	PTD coalition
23 January 2025	Meeting IMCO Secretariat		ECTAA
17 February	Meeting MEP Brnjac office	—	ECTAA
17 February	Meeting with Nesci (MEP, PTD Shadow)	—	ECTAA
18 February	Meeting Kokalari (MEP, PTD Shadow)	—	ECTAA
27 February 2025	PR Saliba's report	Voice ECTAA's strong concern over the report	ECTAA
March 2025	Stakholders meeting	—	PTD coalition
March 2025	PTD Coalition letter	Concerns over the PTD proposal to the IMCO Committee members	PTD coalition
April 2025	PTD Campaign Podcast with Ambassadors	—	ECTAA-Ambassadors
April 2025	Coalition letter to the Shadow Rapporteur	Asking Shadow rapporteur to stay firm on their policy during the negotiations	PTD coalition
April-June 2025	LinkedIn campaign	to influence IMCO MEPs	ECTAA

Date	Action	Objective	Involved
15 May 2025	PR bankruptcy Air Belgium	—	ECTAA- FIT
26 June 2025	PR IMCO Vote	—	ECTAA
July 2025	Stakeholders meeting	—	PTD coalition
August 2025	Call with the Danish presidency	Presentation of ECTAA to the chair of the Council in a view to prepare the trilogue	ECTAA-Rejs
30 October 2025	Coalition letter to the main stakeholders on the Trilogue Draft	Provide the travel industry input on the ongoing Trilogue negotiations	PTD coalition
4 Nov. 2025	Meeting with Agius Saliba (Rapporteur)	Presentation of the Coalition's position and discussion on trilogue	ECTAA HOTREC

Annex 2: Communication Material

Documents and infographics produced or co-produced during the campaign, in chronological order. Each document is reproduced in its original form, scaled to fit the page.

2.1 Package travel or not? Check what rights you have

June 2021 – Flowchart – 2 pages

ECTAA flowchart showing, side by side with the Commission's own flowchart, how traveller rights should be protected depending on the services purchased and prepaid.

2.2 The Package Travel Directive: how can we make it fit for purpose?

April 2022 – Leaflet (ECTAA – EU Travel Tech) – 7 pages

Joint ECTAA – EU Travel Tech leaflet explaining, with a worked family-booking example, the payment flows in a package and the case for a roadmap towards more consistent consumer protection.

2.3 Limitation of prepayments: views of TUI, Expedia and Air France – KLM

21 March 2023 – Workshop summary – 1 page

Summary of the European Parliament workshop co-organised by ECTAA with MEP István Ujhelyi, bringing tour operators, online travel agencies and airlines together on payment flows (minutes issued July 2023).

2.4 Why a limitation of travel package prepayments does not work

April 2023 – Infographic – 1 page

Infographic using a typical family package to show why the Commission's 20% / 80% payment scheme cannot work for traditional or dynamic packages and what it would cost organisers and travellers.

2.5 Impact of proposed prepayment changes on the liquidity of travel intermediaries

March 2024 – Modelling slides – 6 pages

Six slides, prepared with Actuary, modelling the liquidity of an intermediary selling flights under 100%, 75% and 25% prepayment, showing the cash-flow gaps and seasonal effects of a limitation.

2.6 Revision of the Package Travel Directive: ECTAA position

April 2024 – Position brochure – 16 pages

Illustrated brochure setting out ECTAA's positions on prepayments, package definitions (3-hour and 24-hour), the place of departure in Article 12 and insolvency protection.

2.7 Example of the PTD Twitter (X) campaign run by ECTAA in 2024

April–May 2024 – Social media campaign – 2 pages

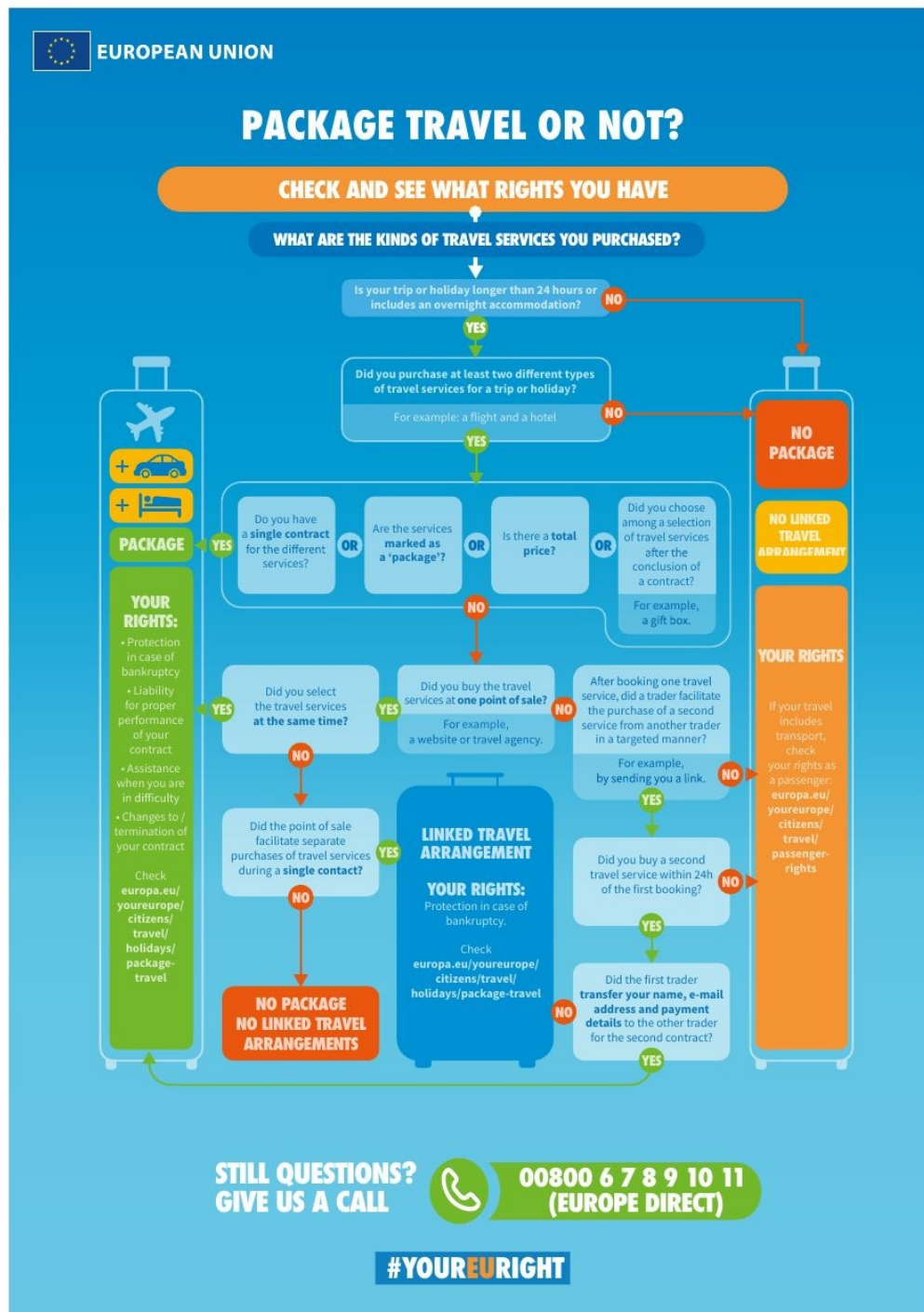
Seven posts from the @ECTAAEurope account, 2 April to 7 May 2024, each pairing one key message with a visual: a global and unhurried approach, simplicity, prepayment protection, a level playing field, crisis tools and B2B refunds.

2.8 Trilogue letter of the European Tourism Industry Coalition

28 October 2025 – Coalition letter – 3 pages

Letter to the European Parliament, the Council and the Commission setting out the coalition's positions on seven points of the trilogue, from the 24-hour package to insolvency protection.





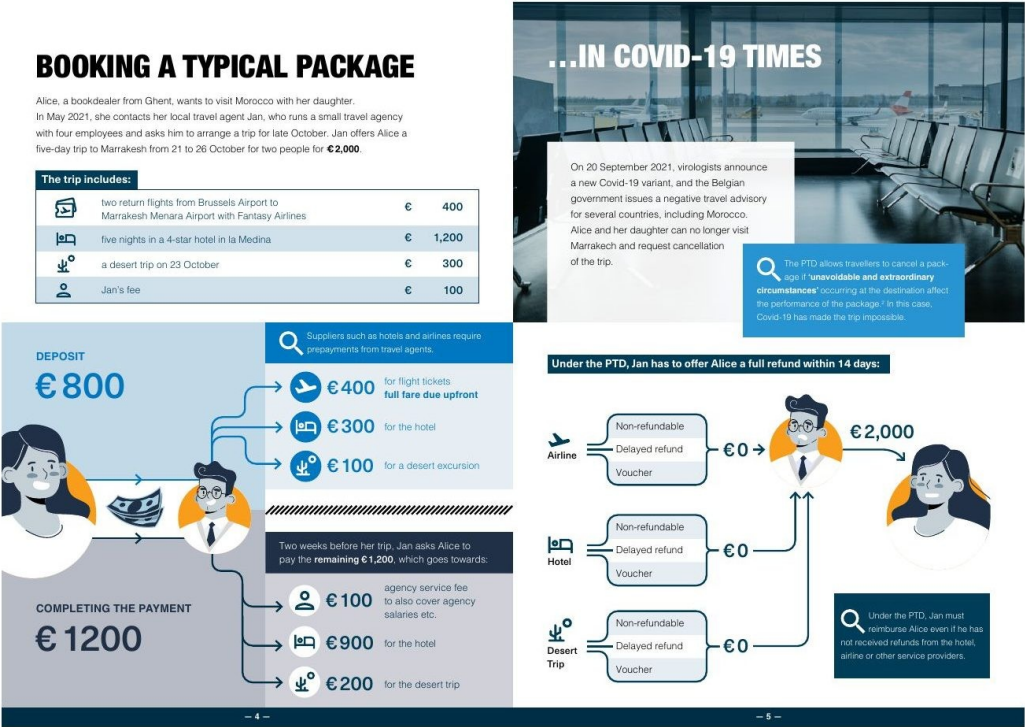


THE PACKAGE TRAVEL DIRECTIVE

How can we make it fit
for purpose?

eu travel tech

ECTAA THE EUROPEAN TRAVEL AGENTS'
AND TOUR OPERATORS' ASSOCIATIONS



A ROADMAP FOR IMPROVED CONSUMER PROTECTION AND A MORE RESILIENT TRAVEL MARKET

1 Harmonising the legal framework

If Fantasy Airlines has not cancelled its flight to Marrakech, it has no obligation to issue a refund for the flight, despite the exceptional Covid-19 circumstances that make the journey impossible.

Travel organisers must bear the full cost of the cancellation. They are obligated by the PTD to refund passengers in full, even without reimbursement from airlines.

SOLUTION
Find increased methods to harmonise cancellation rules for flights and package travel.

2 Ensuing harmonisation and foresight of travel advice

In March 2020, for the first time since the establishment of the European Union, EU Member States began issuing negative travel advice for intra-EU travel. These advisories appeared disparate and oftentimes uncoordinated between Member States.

For instance, at the beginning of the pandemic, Belgian travel advice regarding border entry requirements changed three times in less than one month.

Travel professionals and consumers have been confronted with a high-degree of uncertainty, as international voyages are still susceptible to disparate travel guidance that can change from one day to the next across Member States.

The differences in travel advisories resulted in two negative outcomes:

- Travel agents and tour operators have difficulties in determining whether their customers had the right to cancel under the PTD.
- For those who had booked their holidays in advance – they were uncertain if they should cancel their holidays as travel advice was constantly changing and difficult to interpret.

SOLUTION
Ensure that clear travel advice is harmonised, and coordinated at the EU level with a streamlined approach to announcements.

3 Managing Insolvency Costs

Another challenge faced by travel agents and tour operators is the risk of airline insolvency.

87 EU airline bankruptcies between 2011-2019
Approximately 650,000 passengers stranded
Almost 5 million cancelled bookings¹

Historically, airlines have been exempted from mandatory insolvency protection schemes. This has left consumers exposed to the capricious nature of airline bankruptcies with well over 5 million passengers left either stranded or hunting for new flights.

SOLUTION
Airlines should be obliged to protect tickets against insolvency. This coverage should include air travellers' direct payments and thus their refunds, as well as payments made by package organisers.

- if an airline files for bankruptcy, the protection will benefit the organiser and therefore the traveller.
- Such a scheme is not impossible: Denmark already offers passengers the option of protection on all flights from Denmark on carriers established in Denmark under the PTD fund.

4 Mandating B2B refunds – from suppliers to organisers

In many instances, tour operators and travel agents are unable to receive immediate refunds for the flight tickets. They bear the costs of reimbursing customers within 14 days even if they themselves are not reimbursed by other providers. This situation, multiplied by the thousands, places tour operators, particularly SME operators, in great jeopardy.

SOLUTION

- Introduce an obligation for service suppliers, in particular airlines, to reimburse travel agents and tour operators for consumer cancellations in light of extraordinary events such as the Covid-19 pandemic; or
- Point travel agents and tour operators to reimburse travellers only after they have received a refund from suppliers.

5 Simplifying complex and unclear legal concepts: LTAs

The PTD introduced the incredibly complex concept of Linked Travel Arrangements (LTAs). For example, if a tour operator initially only organises a customer's flight tickets but later adds a hotel at that customer's request, this would now constitute an LTA.

This would also be the case if a consumer books their flight through an airline's website and is then offered options for a cruise. This concept is incredibly complicated for small businesses and consumers alike, who are not regulatory experts or trained lawyers.

Advantages:	Disadvantages:
✓ Travellers receive clear and accurate information on their rights; ✓ Travellers are protected if their service provider goes bankrupt.	✗ It is difficult for travellers and regulators to distinguish between package and LTAs; ✗ The distinction between LTAs and standalone services is unclear; ✗ Many traders are also unaware when their obligations under LTA kick in once a second booking is made; ✗ Many travellers do not know their rights, because the rules are so complex.



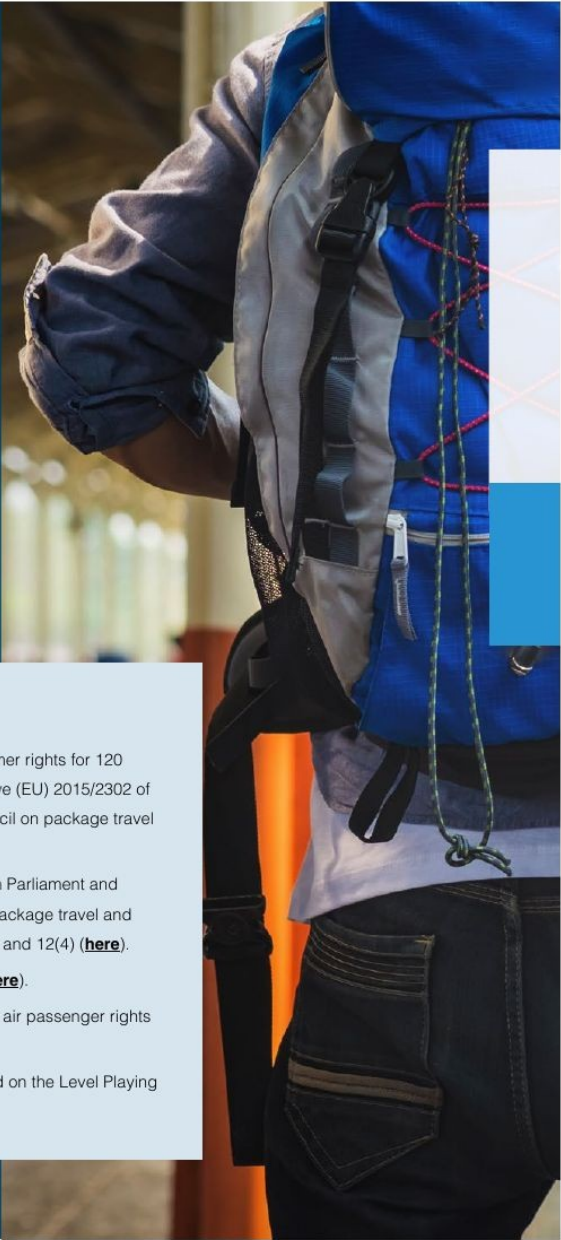
 **SOLUTION**
Simplify the existing framework.

6 Addressing the costs of insurance

Before Covid, travel agents and tour operators already faced difficulties finding professional liability insurance to cover the financial risk of organising a package. The situation has worsened with the Covid-19 crisis, with many insurers pulling out of the market. Any upcoming revision of the PTD should take into account that an increase in existing or new obligations would be very costly for travel agents and operators. Even worse, intermediaries run the risk of not being able to find insurance coverage for their packages at all.



 **SOLUTION**
Any future revision of the PTD should be proportionate in terms of increasing or adding new obligations otherwise these new costs would make it impossible to obtain professional liability insurance.



eu travel tech

ECTAA THE EUROPEAN TRAVEL AGENTS' AND TOUR OPERATORS' ASSOCIATIONS

Sources:

- 1- Commission proposes to improve consumer rights for 120 million holiday makers ([here](#)) and Directive (EU) 2015/2302 of the European Parliament and of the Council on package travel and linked travel arrangements ([here](#))
- 2- Directive (EU) 2015/2302 of the European Parliament and of the Council of 25 November 2015 on package travel and linked travel arrangements, Articles 12(2) and 12(4) ([here](#)).
- 3- Timeline for UK Foreign Travel Advice ([here](#)).
- 4- Study on the current level of protection of air passenger rights in the EU ([here](#)).
- 5- The Effect of COVID-Related EU State Aid on the Level Playing Field for Airlines ([here](#))

ECTAA THE EUROPEAN TRAVEL AGENTS' AND TOUR OPERATORS' ASSOCIATIONS

LIMITATION OF PREPAYMENTS: VIEWS OF TUI, EXPEDIA, AIRFRANCE - KLM



FOREWORD

The COVID 19 pandemic has severely hit the travel industry, bringing it to a halt and questioning the legal framework in which this industry is operating. It is however fair to acknowledge that no ecosystem can be designed to prevent all unexpected events. Therefore, in a context of recovery, the resilience of the travel industry has to remain a priority in the interests of the companies, the employees and the customers.

On 21 March, ECTAA co-organised a workshop in the European Parliament with the support of MEP István Ujhelyi. The purpose of this meeting was to present, with various representative of the tourism value chains (Tour operators, Online Travel agents, Airlines) the payment flows in the travel industry to MEPs, Permanent Representations and interested parties and enter a dialogue with them.

You will find hereafter the main takes of that discussion.



TUI is the world's largest integrated tourism company, serving around 27 million customers in more than 180 countries. TUI covers a wide range of activities including tour operating, cruises, airlines and hotel management. TUI has therefore a unique and global view on the payment cycles in the tourism value chain.

- Prepayments allow advantageous rates on the room and the flight for the consumers while also securing the needed capacities for the high season, again benefitting the consumer.
- Prepayments obtained from consumers are reinvested into the entire tourism ecosystem, both in source and destination markets:
 - Prepayments are passed on to hotels, who use them to maintain and upgrade their facilities before the season, as well as retain and hire staff.
 - Prepayments are also used to secure additional flight capacity for the summer, and to perform the intense winter maintenance on TUI's own planes.
 - Third party travel shops receive an advance on their commission.



Expedia is a leading online travel agency. Expedia does not own the services it intermediates and only offers real time, dynamic packages from a wide variety of suppliers.

- Consumers will choose the different services on the website and then pay in full at the checkout.
- Expedia bundles certain products and gets more favourable prices from the airlines or hotels if they are bundled.
- Suppliers have to be paid within a couple of days.
- This money is reinvested by the services suppliers to cover their fixed costs and maintain the fleets or facilities at the destination during low season.
- Expedia therefore does not hold the money.

AIRFRANCEKLM GROUP

Air France - KLM is a major leading European airline, member of SkyTeam. The group is the result of a merger between two airlines: Air France and KLM.

- Airlines business model is based on the management of the capacity of their planes.
- At least 90% of a plane need to be filled to be profitable.
- Pricing in airline industry is a precarious balance between attractive prices to fill the capacity and high prices to be profitable.
- Prepayments are necessary to ensure travellers' commitment, which in turn guarantees the plane occupancy.

CONCLUSION

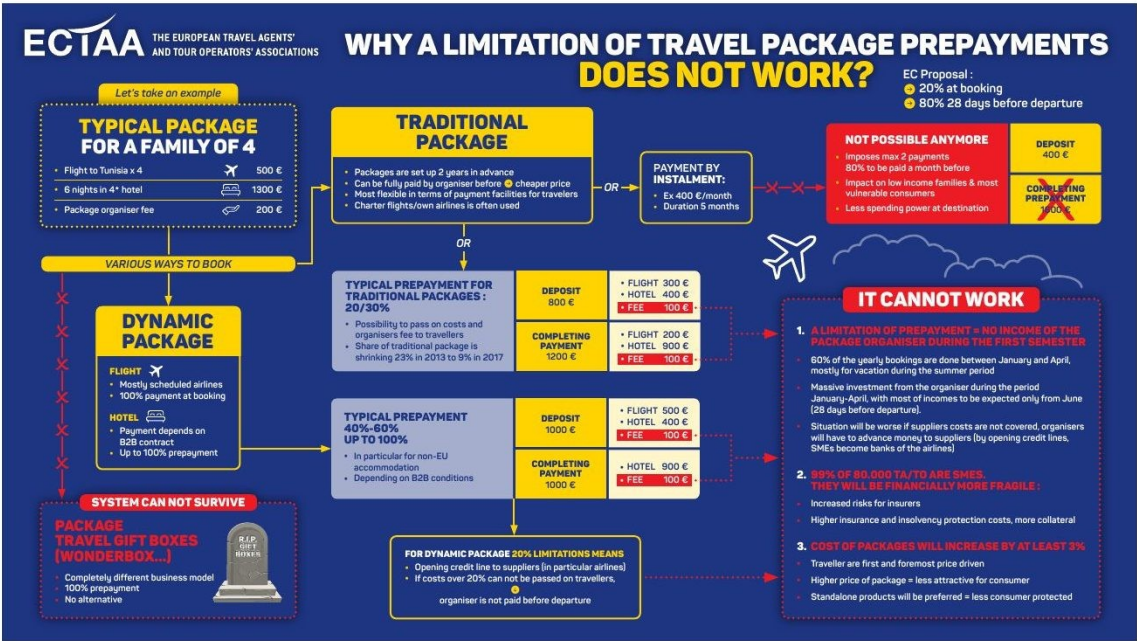
Prepayments are a vital part of the tourism business model.
Limiting them in the Package Travel Directive would have adverse consequences ...

... FOR INTERMEDIARIES

- Package travel sector is highly competitive and functions on very low profit margins.
- Limiting them will eventually lead to a riskier financing scheme and higher prices for consumers.
- Higher prices will drive consumers to opt for loose and component-based travel, less protected than package travel.
- Competitive disadvantage for EU undertakings when they operate outside of the EU market.
- It would particularly hit an industry composed at 99% by SMEs and drive many of them out of the market.

... FOR AIRLINES

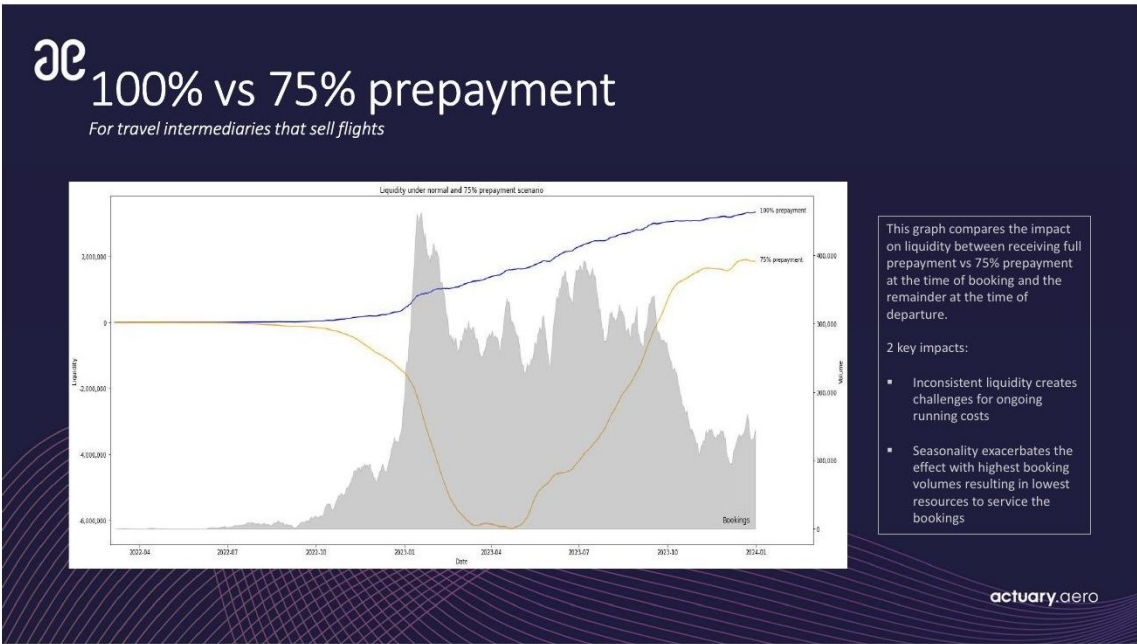
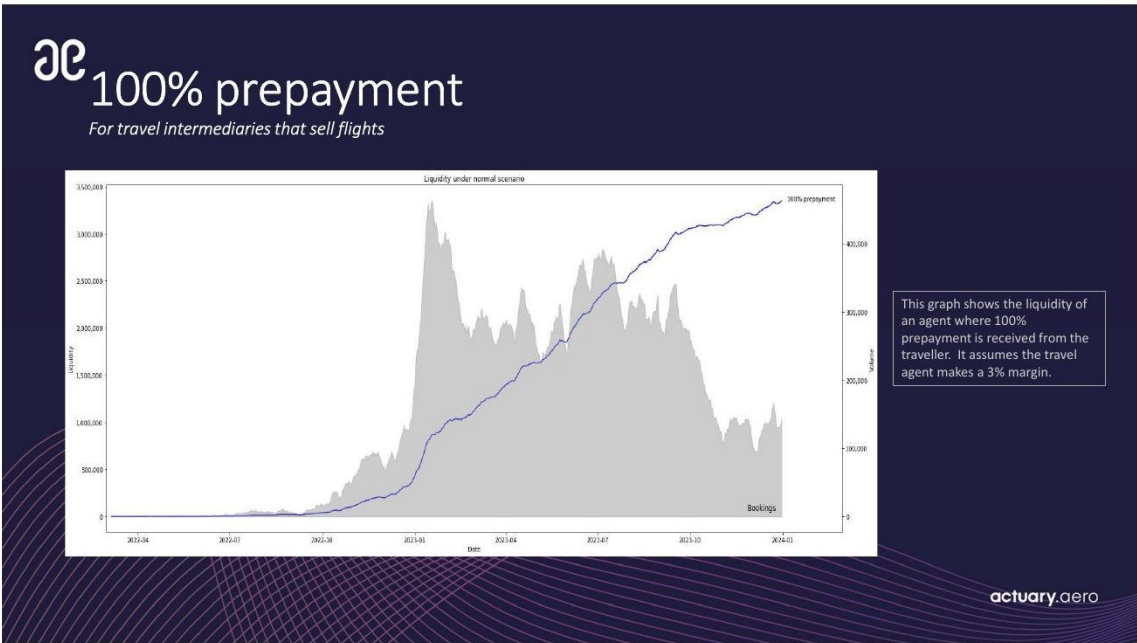
- Prepayment ensures that passengers commit to their booking, otherwise they could cancel at any time.
- Flights can't be empty. It is difficult to fill a plane at last minute because prices are higher and time is scarce.
- The only solution to lower the 90% capacity threshold is to increase prices.
- Less passengers on an airplane = more carbon emissions and higher environmental impact.

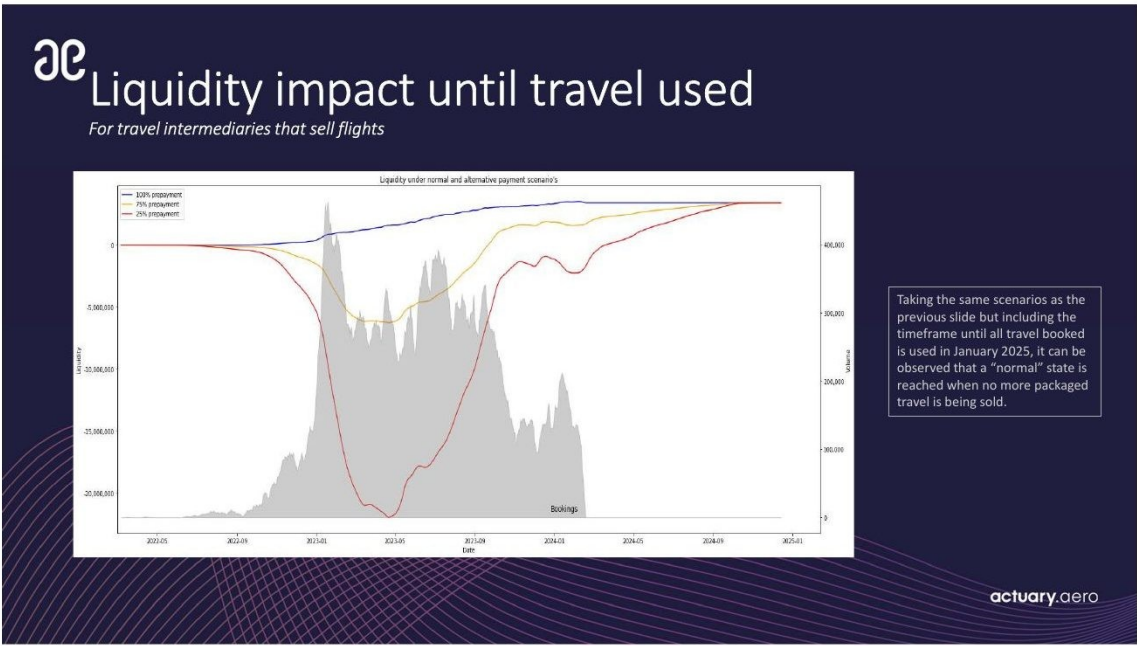
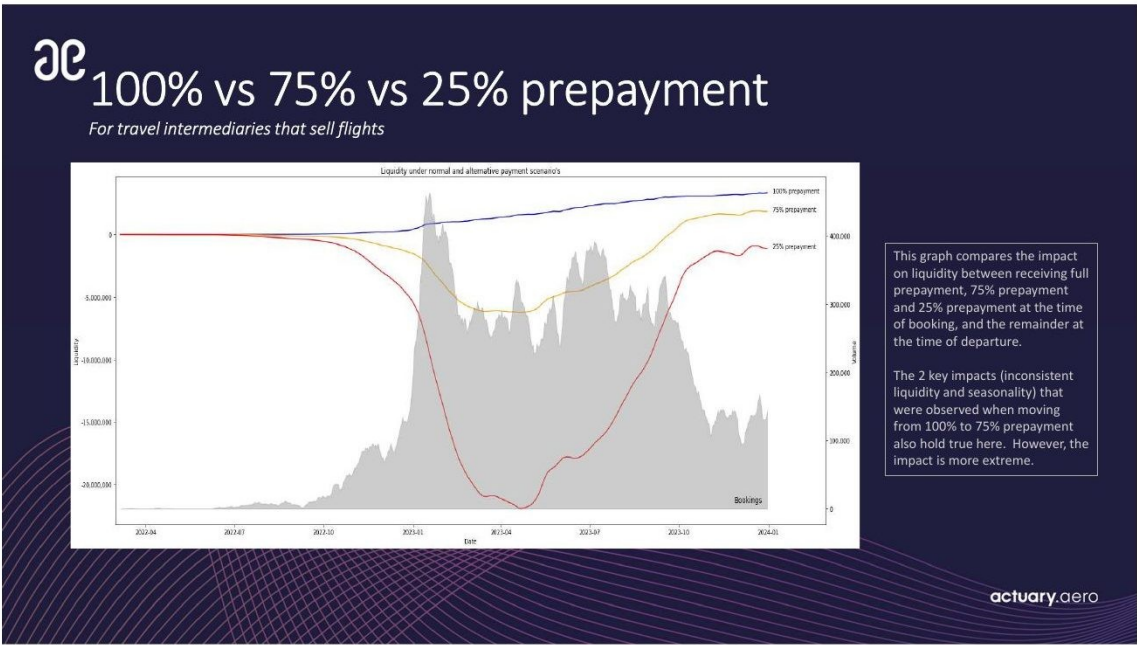




The slide features the Actuary logo, which consists of a stylized 'ae' symbol in white above the word 'Overview' in white. Below the logo, the title 'Overview' is written in large white letters. Underneath the title, a list of bullet points in white text reads: '• 3 scenarios are modelled over the period from April 2022 to Jan 2024:', '• 100% prepayment', '• 75% prepayment', '• 25% prepayment', '• The last graph shows the period from April 2022 to Jan 2025 when all travel is expected to be used (and therefore paid)', and '• A 3% margin is assumed'. The background is dark blue with abstract, wavy, light blue lines. In the bottom right corner, the text 'actuary.aero' is written in white.

- 3 scenarios are modelled over the period from April 2022 to Jan 2024:
 - 100% prepayment
 - 75% prepayment
 - 25% prepayment
- The last graph shows the period from April 2022 to Jan 2025 when all travel is expected to be used (and therefore paid)
- A 3% margin is assumed









Tourism serves as a major economic driver, both regionally within the EU and globally, with a significant impact on economic growth, employment, and social progress. In 2019, before the outbreak of the Covid-19 pandemic, Eurostat reported that tourism contributed an estimated €572 billion to the European economy.

European consumers interact with tourism businesses through various travel services and engagement models, whether directly or through intermediaries, demonstrating the diverse and evolving nature of consumer behaviour within the tourism industry. In this highly competitive and price-driven environment, it is imperative that the most protective travel products remain competitive.

Since 2013, the popularity of package holidays has waned. In 2019, package holidays accounted for 15% of the tourism market share in the EU27, marking a significant decline from the 40% market share (205 million packages sold) recorded in 2013. However, recent trends indicate a resurgence in demand for package holidays. Factors such as the aftermath of the pandemic and increased global uncertainties, including geopolitical tensions and climate change, have contributed to this renewed interest. Individuals are increasingly seeking the security that package holidays offer in uncertain times.

Recently, the number of package holiday users has shown stability and is projected to grow by 1.2% over the next few years, potentially reaching around 94.1 million users by 2025. Additionally, Statista's projections indicate promising growth in the EU's revenue from the package travel segment, expected to reach around €95 billion by 2025, marking a 17% increase compared to 2019. While still a considerable distance from the 205 million packages sold in 2013, package holidays continue to demonstrate resilience and remain a cornerstone of the tourism industry.

Any revision of the Package Travel Directive must strike the appropriate balance between a high level of consumer protection and market attractiveness to maintain options for travelers looking for protected holidays. To this end, ECTAA emphasizes the critical importance of fortifying consumer protection in transactions involving standalone travel services, comprehensively safeguarding consumers' rights and interests throughout their entire travel experience, rather than imposing additional onerous obligations solely upon package tour operators. Our subsequent position on the proposed revision of the Package Travel Directive is aimed at achieving this delicate balance.

Eric DRESIN
Secretary General

ECTAA REVISION OF THE PACKAGE TRAVEL DIRECTIVE

REVISION OF THE PACKAGE TRAVEL DIRECTIVE SUMMARY OF ECTAA POSITION

NO LIMITATION ON ADVANCE PAYMENT SHOULD BE INTRODUCED FOR PACKAGE TRAVEL (NEW ART. 5A)

1. The refund problems faced by consumers during COVID 19 were mainly due to the lack of refund in the whole travel value chain, especially for individual flights.
2. The limitation of prepayment is an additional obligation on top of the insolvency protection and various other guarantees that a package organiser already has to provide (e.g. securities for the sale of tickets and for credit card companies). Suppliers of standalone services providers (such as hotels or airlines) do not have to provide such protection. Applying the PTD principles of insolvency protection to standalone travels would be a better solution.
3. The most vulnerable consumers will be affected by the two-payment rule, which will limit travellers' ability to pay in instalments (4 or 5 times). This restriction will drive up package prices, weaken the liquidity of travel organisers and will not reduce the cost of insolvency protection. On the contrary, it will further fragilize organisers' liquidities and encourage consumers to choose cheaper, less protected travel alternatives.

PROPOSED CHANGES TO THE DEFINITION OF PACKAGE ARE MORE COMPLEX AND IMPOSSIBLE TO APPLY (ART. 3(3) AND 3(5))

1. The definitions of packages and LTAs are far too complex. Simplification would have been much more welcome and future-proof. This can still be achieved if more is done on passenger rights by providing equivalent protection to consumers at all times.
2. The provisions on packages bought within 3 or 24 hours are impossible to comply with. It clashes with the obligation to provide accurate pre-contractual information in the same PTD. It is impossible to know in advance what service will be sold, as it may change afterwards. Moreover, changing the terms and conditions of the first service after the sale will be confusing and burdensome for consumers.

PACKAGE ORGANISERS ARE NOT INSURERS (TAKING INTO ACCOUNT THE PLACE OF DEPARTURE/RETURN IN THE RIGHT TO CANCEL FREE OF CHARGE) (ART. 12)

1. ECTAA strongly opposes the inclusion of the situation of the place of departure and return as a possible reason for a free cancellation by the consumer. The balance of risks goes too far with this proposal. An organiser is responsible for what is promised and provided for in the contract. In addition, we are entering the field of travel insurance. Package organisers are not insurers and more discussion with the insurance sector to cover the risks that have occurred during Covid 19 should be explored. However, the Package Travel Directive is not the place for such a debate.
2. If such a right is introduced, the B2B refund rules need to be aligned, i.e. all services of the package should be refunded by the suppliers, even those not cancelled by the latter.



ECTAA REVISION OF THE PACKAGE TRAVEL DIRECTIVE

1. LIMITATION OF PREPAYMENTS
(NEW ARTICLE 5A)

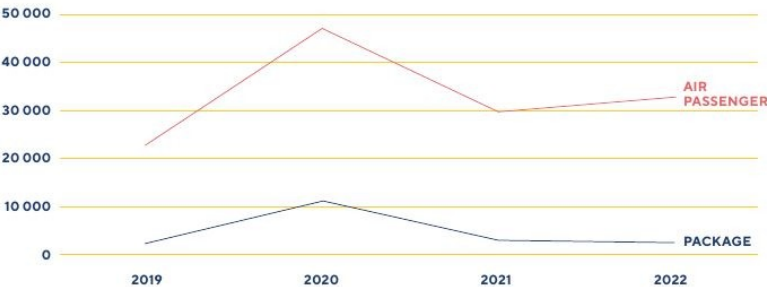
NO LIMITATION ON ADVANCE PAYMENT SHOULD BE INTRODUCED FOR PACKAGE TRAVEL (NEW ART. 5A):

- 1. The refund problems faced by consumers during COVID 19 were mainly due to the lack of refund in the whole travel value chain, especially for individual flights.
- 2. The limitation of prepayments is an additional obligation on top of the insolvency protection and various other guarantees that a package organiser already has to provide (e.g. securities for the sale of tickets and for credit card companies). Standalone service providers do not have to provide such protection. Applying the PTD principles of protection of prepayments to standalone travels would be a better solution.
- 3. The most vulnerable consumers will be affected by the two-payment rule, which will limit travellers' ability to pay in instalments (4 or 5 times). This restriction will drive up package prices, weaken the liquidity of travel organisers and will not reduce the cost of insolvency protection. On the contrary, it will further fragilize organisers' liquidities and encourage consumers to choose cheaper, less protected travel alternatives.

1.1. PACKAGE TRAVEL IS NOT THE ROOT CAUSE FOR THE LACK OF REFUNDS DURING THE COVID 19 PANDEMIC

In the context of the Covid 19 pandemic, packages were by far less problematic than standalone travel services, in particular flights. Where package organisers were constrained in processing refunds, this was largely due to the refusal or delay on the part of their suppliers to refund (again mostly airlines). There is abundant documentation about the main source of travellers' complaints (Fig 1), the amount of state aids (Fig 2) and whether the grants were actually used for the refund of consumers (Fig 3).

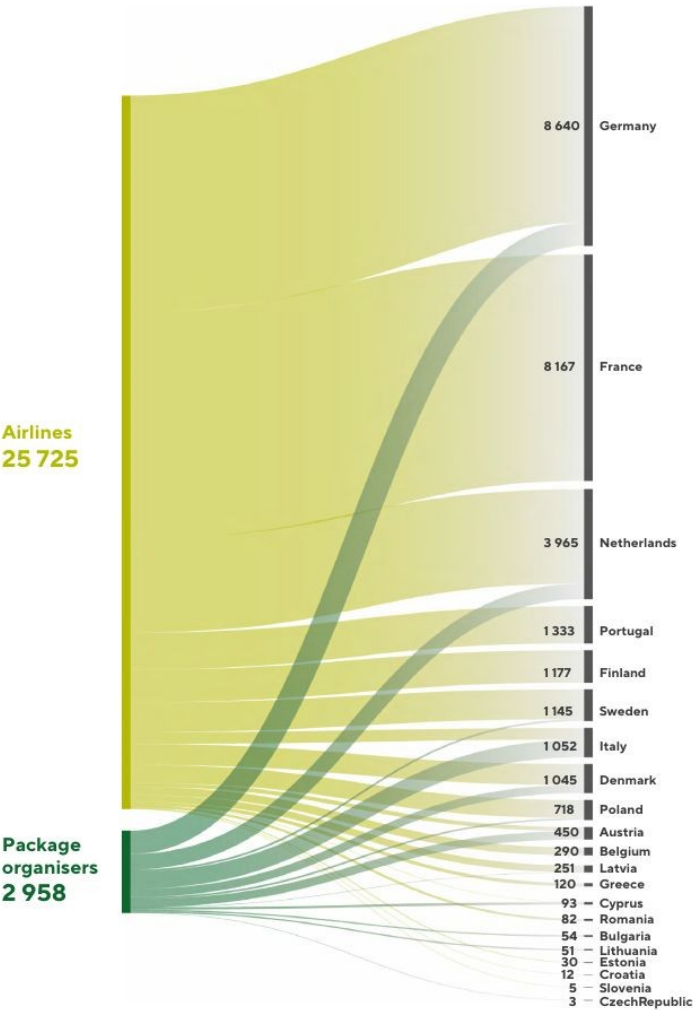
Fig. 1: Comparison of cross border complaints received by the European Consumer Centre Network between 2019-2022. Source: Consumer scoreboard 2023¹



1. https://commission.europa.eu/document/download/89ea35fe-728f-4749-b95d-88544687583c_en?filename=consumer_conditions_scoreboard_2023_v11.pdf

ECTAA REVISION OF THE PACKAGE TRAVEL DIRECTIVE

Fig 2: Comparison of State aid dedicated to airlines vs package organisers.
Source: European Court of Auditors Special Report 15/2021 "Air passenger rights during the COVID-19 pandemic: Key rights not protected despite Commission efforts"²



2. https://www.eca.europa.eu/Lists/ECADocuments/SR21_15/SR_passenger-rights_covid_EN.pdf

ECTAA REVISION OF THE PACKAGE TRAVEL DIRECTIVE

Fig 3: Comparison of State aid dedicated to airlines vs package organisers

Source: European Court of Auditors Special Report 15/2021 "Air passenger rights during the COVID-19 pandemic: Key rights not protected despite Commission efforts"

	Airlines	Package Travel
Share of State aid	58. Our analysis showed that most of the aid granted by Member States (€31.8 billion, more than 90 % of the total aid provided) went to airlines	
Amount spent on State aid	58. €25.7 billion of State aid to specific airlines and €6.1 billion multi-sectoral aid. Total 31.8 billion	60. 16 measures (providing a total support of €2.9 billion)
Objective of the State aid/ refund of consumers	59. We also found that, in none of the 38 cases reviewed, Member States explicitly included the reimbursement of passengers as an objective or as a condition for granting the aid, despite the Commission's suggestion to do so	61. The design of 13 out of the 16 cases reflected a specific and explicit concern with the rights of package travellers

The proposed limitation of prepayments would distort competition. Firstly, payment terms, both advance and final, are crucial competitive parameters in the travel industry. The proposal significantly reduces the ability of tour operators to compete with each others on these terms.

Secondly, the fact that only tour operators are subject to this restriction also distorts competition. This means that all suppliers of travel services not covered by the Package Travel Directive will be in a much better competitive position if the proposal only regulates the organiser's payment terms to the traveller.



ECTAA REVISION OF THE PACKAGE TRAVEL DIRECTIVE

1.2. UNNECESSARY DOUBLE/TRIPLE PROTECTION

Advance payments made by package travellers are already protected against insolvency (Art. 17 & 18 of the current PTD), while none of the service suppliers, who sometimes collect a 100% advance payment at the time of booking (e.g. stand-alone flights), are covered by any protection. It would make much more sense to protect the pre-payments of the vast majority of travellers who book stand-alone services, notably flights.

In addition to the insolvency protection arrangements that package tour operators are required to put in place under the PTD, they are also required to provide various forms of security to third parties, such as bank guarantees, which underpin the PTD insolvency protection arrangements, financial security arrangements are required by suppliers such as IATA for the sale of standalone flights, and credit card companies seek similar arrangements to cover customer charge-back requests. Against this background, the imposition of a limit on advance payments is disproportionate, unnecessary and costly.

Standalone service providers or suppliers will thus gain an obvious unfair competitive advantage by being able to offer more attractive prices and payment terms if they are not affected in terms of liquidity in the same way as tour operators. At the same time, consumer protection will be reduced if travellers are encouraged to buy directly from suppliers at a lower price, at the cost of losing the excellent protection that comes with buying a package.

In order to avoid a situation with such distortive elements of competition, while at the same time ensuring a higher level of protection in the travel and transport sector as a whole, the most obvious solution would indeed be to introduce a common European requirement for insolvency protection in air transport as part of the ongoing revision of passenger rights legislation.

The introduction of common insolvency protection rules for all passenger air transport would provide a much higher level of protection for all EU citizens. At the same time, such an arrangement would address the challenges cited by the European Commission as the reason for its proposal to limit the ability of tour operators to receive advance payments.

Finally, the proposal carries the risk that travellers will cancel their trips shortly before departure but before the final payment has been made. This would result in additional costs and therefore more expensive holidays for both tour operators and travellers.



ECTAA REVISION OF THE PACKAGE TRAVEL DIRECTIVE

1.3. THIS MEASURE WILL DRIVE PRICES UP AND WEAKEN PACKAGE ORGANISERS

Firstly, the restriction on advance payments will require bookings to be settled in two instalments (25% and then 75%). This will de facto prevent operators from offering more flexible payment plans, such as instalment payments (e.g. 4 or 5 instalments). This will affect the most vulnerable consumers.

Moreover, restricting advance payments for packages will not save money on insolvency protection. On the contrary, it is more likely that a package tour operator will not make a profit in the first half of the year, thus weakening its liquidity.

1.4. THE LIMITATION WILL PREVENT PACKAGE ORGANISERS TO MAKE PROFIT FOR THE FIRST HALF OF THE YEAR

The proposed provision allows for exceptions to the general rule that advance payments may not exceed 25% in specific cases. However, this exception is far from sufficient to address the liquidity problems that this provision will create for tour operators.

The proposed exemption scheme does not allow package tour operators to cover their operating costs (salaries, building/energy costs) or their margins. Given that the peak booking period for packages is usually in winter for packages departing in July/August, this means that a package organiser will only start to make a profit in June/July (28 days before departure, when the proposal allows the organiser to collect the balance of the money).

As a result, the liquidity of package tour operators will be weakened and they will be more exposed to insolvency risks (which is the exact opposite of what this limitation is supposed to achieve). Insurance costs will increase to cover the new risks, pushing up package prices. Packages will be less attractive to price-conscious consumers, who will prefer cheaper but unprotected alternatives.

1.5. THE EXEMPTION TO LIMIT ADVANCE PAYMENTS WILL STILL COMPEL ORGANISERS TO PRE-FINANCE PACKAGE HOLIDAY

According to the wording, only prepayments to suppliers at the time of the conclusion of the contract can be received from the traveller. As a package holiday often consists of several different travel services from different suppliers, payment to these suppliers will depend on their individual payment terms and will therefore vary for each package holiday.

The wording of the provision, which provides that only payments at the time of contract conclusion are covered by the exemption, makes the practical application of the provision illusory and thus fails to address the significant liquidity risk that the provision imposes on the travel organiser.

In cases where a payment to suppliers is required after conclusion of the contract but within 28 days before departure, the tour operator is effectively forced to pre-finance large parts of the package for the traveller.



ECTAA REVISION OF THE PACKAGE TRAVEL DIRECTIVE

2. DEFINITIONS (ARTICLE 3)

NEW COMBINATIONS OF PACKAGES MORE COMPLEX AND IMPOSSIBLE TO APPLY (ART. 3(3) AND 3(5))

1. **Definitions of package and LTA are far more complex and unworkable in practical terms. A simplification would have been much more welcomed and future proof**
2. **Provisions on packages concluded within 3 and 24 hours are impossible to comply with. They are incompatible with the obligation to provide accurate precontractual information under the very same PTD. It is impossible to know what service will be sold in advance as it can change afterwards. Moreover, changing the contract terms of the first service after its sale will be confusing and burdensome for the consumers**
3. **Definition on Click Through package should have a time limit. As drafted the combination captured by the definition is too far reaching**

2.1. THE DEFINITIONS OF PACKAGE AND LTA ARE TOO COMPLEX.

A simplification of the scope would have been welcome. The existing definitions of package are difficult to apply, enforce and for consumers to understand. This could be achieved by applying a comparable level of protection to individual travel services and packages. Better equivalence would allow the scope to be simplified without compromising consumer protection.

ECTAA regrets that the European Commission, when working on the parallel revisions of passenger rights and the PTD, did not go further in alignment, preferring a light brush approach on passenger rights, while further complexifying and overburdening the PTD. As a result, the proposed definition of package will be more complex than the current one, to the extent that it will be unworkable for intermediaries to sell both packages and individual services.

2.2. THE NEW DEFINITION OF A PACKAGE MADE BY BOOKING 2 SERVICES CONSECUTIVELY WITHIN 3 HOURS IS PARTICULARLY CRITICAL.

It assumes that the consumer could put together a package without the organiser being informed (different names, different credit cards, etc...). Arrangements made by consumers may not be feasible (eg connecting times between flights too short). An organiser should not be responsible for a package of services put together by the customer and that he would never have agreed to sell.

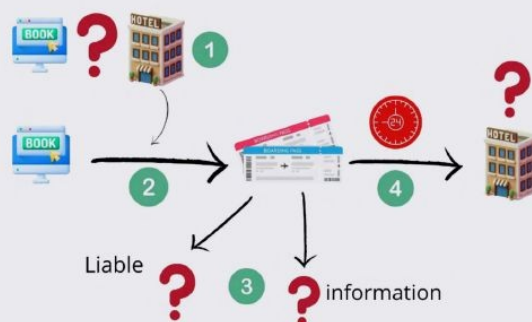
2.3. DEFINITION ON CLICK THROUGH PACKAGE SHOULD HAVE A TIME LIMIT

With the definition of package including now the consecutive sales of two travel services within 3h and 24h, it would be impossible to provide accurate precontractual information of the first travel service as neither the trader nor the consumer will know what kind of service is purchased (package or standalone service) until eventually a second sale is concluded or the time limit is passed.

ECTAA REVISION OF THE PACKAGE TRAVEL DIRECTIVE

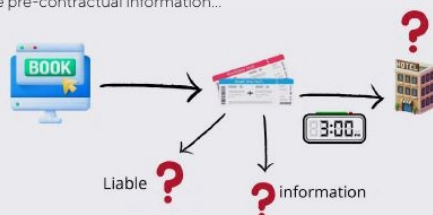
EXAMPLE OF THE “24H PACKAGE”

To be a package, the trader must offer the possibility of booking an additional travel service (here a hotel) (1) during the booking process of the first travel service (a flight) (2). The problem is that it is impossible to know what the consumer actually books as first travel service (standalone service or package) (3) until the second travel service is booked or the 24h time limit is over (4). As drafted it is not possible to provide the consumer with essential information on the first service, such as the identity of the professional responsible for providing the service, the existence of insolvency protection, etc...



EXAMPLE OF THE “3H PACKAGE”

A similar logic would apply to the “3h package”. A valid contract for a single travel service may become part of a package when a consumer books an additional service within 3h. This means, for the first travel service, that (1) the party liable for the contract, (2) the legislation governing B2C relations and (3) the information to be provided might change, depending on the booking of a second travel service. In short, neither the trader nor the consumer knows exactly what is booked on a travel website for 3 hours, resulting in inaccurate pre-contractual information...



Aside the automatic infringement of pre-contractual information, packages concluded “within 3h or 24h” are disproportionately burdensome to apply from a contract law perspective. The conclusion of a package after the sale of the second service within 3h will only be possible with a change in the contract terms of the first service (from standalone service to a component of a package). How to do that? Should the consumer sign an addendum to the first contract he just agreed on? What if the consumer refuses to sign it? Is it even able to refuse (a consumer can’t waive its consumer rights)?

ECTAA REVISION OF THE PACKAGE TRAVEL DIRECTIVE

3. PACKAGE ORGANISERS ARE NOT INSURERS (ARTICLE 12)

1. ECTAA strongly opposes the inclusion of the situation of the place of departure and return as a possible basis for the consumer's right to cancel free of charge. The balance of risk in this proposal goes too far. Rights under the Package Travel Directive should be based on objectively verifiable facts and not on expectations, perceptions or feelings. Similarly, the tour operator should only be liable for what is set out in the package travel contract. Therefore, the tour operator is liable for matters directly related to the provision of the various travel services included in the package. Beyond that, we are entering the realm of travel insurance. Package tour operators are not insurers and further discussions with the insurance sector should be explored to cover the risks that have arisen during Covid 19.
2. If such a right is introduced, then the B2B refund rules need to be aligned, i.e. the third-party supplier of a travel service, such as an airline, should be obliged to refund the organiser, regardless of whether the third-party supplier provided the service (i.e. the airline operated the flight) or not. Otherwise, where will the organiser find the money to refund the traveller? Moreover, in the event of a cancellation due to Unforeseen and Exceptional Circumstances (UEC) at the place of departure/return, the travel services composing the package will still operate, leaving the organisers with no right of redress against the suppliers (i.e. 'the ghost flights' operated during the pandemic).

If the Commission wishes to introduce such a right, then the organiser's right of redress/the suppliers' obligation to reimburse in Article 22(2) must be aligned with Article 12(2), meaning that all services composing the package should be refunded to the organiser, even the ones that were performed or could have been performed. Otherwise, there is a strong possibility that a supplier will retain the travellers' monies, leading to the organiser to reimburse the traveller from its own funds - further weakening the organiser's liquidity and giving the suppliers an unfair advantage in retaining the traveller's monies.





ECTAA REVISION OF THE PACKAGE TRAVEL DIRECTIVE

4. INSOLVENCY PROTECTION (ARTICLE 17)

1. The integration of refund claim of cancelled package should be clarified to ensure that the protection doesn't go beyond what the customer has paid, otherwise the proposal is too far reaching. Similarly, clarification on the concept of refund should be made to ensure the protection is limited to the customer's actual loss, in particular concerning partially performed package.
2. In relation to the three-month deadline in Article 17(6), ECTAA notes that this is not realistic, in particular if refund claims are involved. Instead, some flexibility should be provided for, so that in exceptional situations (e.g. pandemic) this repayment deadline can be waived.

5. OTHER MEASURES TO BE CONSIDERED

In addition to the priorities identified by ECTAA and presented in this document, there are several other issues that deserve to be addressed. More information will be provided in due course.

- Exclusion of business travel should be extended to MICE travel.
- Information on the approximate time of departure should be optional and not mandatory as it is now in the existing PTD.
- B2B refunds should be based on an obligation for suppliers to refund cancelled packages, not on a right of recourse for organisers.
- The rapid refund mechanism should allow Member States to introduce ad hoc State aid in the event of a major crisis. At present, the proposal favours the establishment of a more costly and less flexible crisis fund.
- In the event of a major crisis affecting the ability of package tour operators to recover consumer payments from suppliers, refunds should be made as soon as possible, not within 14 days as in the current legislation.





FULL MEMBERS



AFFILIATED MEMBERS



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Example of the PTD Twitter (X) campaign run by ECTAA in 2024

Seven posts published on @ECTAAEurope between 2 April and 7 May 2024, each pairing one key message with a visual and a link to ECTAA's position. Part of the spring 2024 social media campaign aimed at the Council of Ministers.

ECTAA Europe

@ECTAAEurope

Boost

When it comes to improving tourists' rights, the approach should be global and encompass both packages and standalone travels. Lawmakers are in a unique position to make meaningful & harmonised improvements. The process should not be rushed.

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LET'S TAKE THE TIME

TO MAKE MEANINGFUL, HARMONISED, AND MEASURED IMPROVEMENTS TO TOURIST RIGHTS

ECTAA

5:10 PM · Apr 2, 2024 · 184 Views

2 APRIL 2024

Let's take the time

A global approach covering packages and standalone travel; no rushed process.

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Boost

Designed in the pre-internet 1990s as a way to enjoy a carefree holiday, the #PTD is no longer the only way people book trips . It represents 15% of all travel services sold! Learn how we can take inspiration from the PTD to better protect the other 85%  shorturl.at/adekU



TIMES HAVE CHANGED

THE PTD MUST BE ADAPTED TO IMPROVE THE RIGHTS OF TRAVELERS IN THE INTERNET AGE

ECTAA

1:43 PM · Apr 4, 2024 · 150 Views

4 APRIL 2024

Times have changed

The PTD covers only 15% of travel services sold: adapt it to the internet age.

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Boost

When it comes to the overhaul of the #PTD, lawmakers should prioritise simplicity and clarity and not impose new burdens on small businesses in a rapidly shrinking market.

Want to learn more about our position? Click this link  shorturl.at/onEGV



TO BOOK A TRIP

with confidence you need clear and accurate information

4:37 PM · Apr 16, 2024 · 176 Views

16 APRIL 2024

Clear and accurate information

Simplicity and clarity for small businesses in a shrinking market.

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Boost

Limiting prepayments will lead package organisers not being able to earn money during the first part of a given year.

We advocate instead for including the protection of prepayments in mandatory airline insolvency protection.

Explore our full position  shorturl.at/ckmMU



PREPAYMENTS PROTECTION

IS ESSENTIAL FOR TRAVELER TRUST AND INDUSTRY RESILIENCE

ECTAA

Last edited 2:38 PM · Apr 25, 2024 · 192 Views

25 APRIL 2024

Prepayments protection

Protect prepayments through mandatory airline insolvency protection.



30 APRIL 2024 Levelling the playing field
Unfair stipulations, such as reimbursement duties not imposed on airlines.



2 MAY 2024 Must ease SME burdens
Crisis management measures to refund consumers without overburdening agents.



7 MAY 2024 Enhance B2B process and enforcement
B2B refunds so that package travellers are refunded in time.

Six messages, one campaign

- A global approach: packages and standalone travel alike
- Adapt the PTD to the internet age
- Simplicity and clarity, not new burdens on SMEs
- Protect prepayments through airline insolvency protection
- A level playing field with airlines
- Crisis tools and B2B refunds so consumers are refunded in time

Source: @ECTAAEurope posts, April–May 2024.

To:

The Members of the European Parliament,
The Council of the European Union,
The European Commission

Brussels, 28 October 2025

Subject: Position of the European Tourism Industry Coalition on the Revision of the Package Travel Directive (PTD)

Dear Representatives,

On behalf of the **European Tourism Industry Coalition**, representing a broad ecosystem of travel and tourism businesses across Europe, we wish to express our collective position on key issues currently under discussion during the **trilogue negotiations on the revision of the Package Travel Directive (PTD)**.

The tourism industry plays a vital role in Europe's economy. Almost 1 in 13 enterprises in the EU business economy belonged to tourism industries, employing 12.3 million persons, fostering regional development, and contributing to Europe's global competitiveness. Any revision of the PTD must therefore ensure **legal clarity, proportionality, and a harmonised internal market**, avoiding unnecessary administrative burdens that could undermine the sector's recovery and resilience.

We outline below our key positions on the most critical points under negotiation:

1. Definition: 24-Hour timeframe (Article 3)

The coalition fully supports the **Council's position** to delete the new definition of a package composed within 24 hours. These provisions are **impossible to comply with** and incompatible with the PTD's existing obligation to provide accurate pre-contractual information. At the time of booking, it is not possible to predict which additional services a traveller might later add. Moreover, altering the terms of an initial contract after its sale would create confusion and unnecessary burdens for both businesses and consumers. This new definition could make obsolete the legal provision that permits the combination of a travel service with another, provided that the latter does not constitute a significant proportion (less than 25% of the total value) of the package.

We therefore call on the **European Parliament** to support the deletion of this provision during the trilogue negotiations.

2. Limitation of Prepayments (Article 5a)

The coalition strongly supports the **deletion of Article 5a**, which would have introduced rigid, one-size-fits-all restrictions on consumer prepayments.

Although the Parliament's proposal to allow Member States to set national limitations might appear flexible, it would in practice create **fragmentation across the EU**, undermining the internal market and increasing compliance costs for cross-border operators.

We therefore urge policymakers to preserve a **harmonised framework** that ensures a **level playing field for all tourism operators** throughout Europe.

3. Complaint Handling Mechanism (AM 75)

The proposed complaint-handling obligation would introduce unnecessary duplication and administrative complexity. Existing EU legislation already provides travellers with the right to submit complaints and seek redress. Adding new, overlapping provisions under the PTD would only increase bureaucracy and compliance costs—particularly for **SMEs**—without offering any tangible benefits to consumers.

The coalition therefore supports the **Council's position** to refrain from introducing this new obligation.

4. Penalties

Introducing an additional penalty regime specifically for package travel would impose **disproportionate burdens** on organisers and other actors in the tourism value chain including on those only selling small share of packages in their total turnover. Such a regime would **duplicate enforcement mechanisms** already available under EU consumer law—namely, the **Omnibus Directive (EU 2019/2161)** and the **CPC Regulation (EU 2017/2394)**.

National authorities already possess adequate tools to ensure compliance, which are expected to be further reinforced in the forthcoming revision of the CPC Regulation. Moreover, applying a penalty system based on total turnover would be particularly unfair to traders for whom package organisation is not their primary business activity.

The coalition therefore supports the **Council's approach** and calls for the deletion of the additional penalty provisions.

5. Alternative Dispute Resolution (ADR/ODR)

While the tourism industry supports efficient and fair dispute resolution, the proposed amendments on ADR/ODR mechanisms are **unnecessary and duplicative**. These systems are already **fully regulated at EU level** and have recently been revised. Adding a separate obligation under the PTD would only create confusion and additional compliance costs, without improving consumer protection.

The coalition therefore supports the **Council's position** on this matter.

6. Right of withdrawal

We welcome that both Parliament and Council remove force majeure at the place of traveller's residence as a relevant criterium to allow free cancellations. We would however welcome a further clarification that the travel organiser should not be responsible for personal force majeure situations of the traveller, such as the traveller arriving too late on personal transport to the contractually agreed place of departure.

7. Insolvency protection calculation

We support the Council approach which confirms the current situation that the financial security to be provided by travel organisers should be calculated based on the actual risk, taking into account any changes in the volume of packages sold throughout the year. The Parliament's suggestion to impose the highest level of protection also in times when this is not needed, will drive unnecessary costs.

Conclusion

The European tourism ecosystem remains committed to protecting travellers while maintaining a competitive, innovative, and sustainable industry. We urge all institutions to ensure that the revised PTD fosters **legal certainty, consistency, and proportionality**, rather than introducing overlapping and unworkable provisions.

We thank the institutions for their continued engagement and stand ready to contribute constructively to the final stages of the negotiation process.

Yours sincerely,

The European Tourism Industry Coalition



Annex 3 — Sources and Further Reading

All sources are official EU publications (EUR-Lex, Court of Justice, European Parliament, Council, European Commission and other EU bodies). Each entry follows the same format: issuing body, official title, reference number, date. Article numbers of Directive (EU) 2026/1024 follow the text as agreed in the interinstitutional negotiations and should be read against the Official Journal version. The "Notes" column gives the footnote numbers of this report.

A. Sources cited in the footnotes

Notes	Source	Link
1, 18, 21	European Commission, Proposal for a Directive of the European Parliament and of the Council amending Directive (EU) 2015/2302 to make the protection of travellers more effective and to simplify and clarify certain aspects of that Directive, COM(2023) 905 final, 29 November 2023	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2023%3A905%3AFIN
1, 3, 25	European Parliament, Legislative Observatory, Package travel and linked travel arrangements: make the protection of travellers more effective and simplify and clarify certain aspects, procedure file 2023/0435(COD)	https://oeil.europarl.europa.eu/oeil/en/procedure-file?reference=2023/0435(COD)
2	European Parliament, Committee on the Internal Market and Consumer Protection, Report on the proposal for a directive amending Directive (EU) 2015/2302 (COM(2023)0905 - C9-0436/2023 - 2023/0435(COD)), rapporteur Alex Agius Saliba, A10-0140/2025, 15 July 2025	https://www.europarl.europa.eu/doceo/document/A-10-2025-0140_EN.html
2	European Parliament, Amending the Directive on package travel and linked travel arrangements, text adopted P10_TA(2025)0195, 11 September 2025	https://www.europarl.europa.eu/doceo/document/TA-10-2025-0195_EN.html
4	European Parliament, Package travel and linked travel arrangements: make the protection of travellers more effective and simplify and clarify certain aspects, text adopted P10_TA(2026)0085, 12 March 2026	https://www.europarl.europa.eu/doceo/document/TA-10-2026-0085_EN.html
5	Council of the EU, Consumer protection: Council gives final sign off to additional safeguards for package travel users, press release, 30 March 2026	https://www.consilium.europa.eu/en/press/press-releases/2026/03/30/consumer-protection-council-gives-final-sign-off-to-additional-safeguards-for-package-travel-users/
6, 7, 8, 9, 10, 11, 12, 13, 14, 16, 23, 28, 29, 30, 31	Directive (EU) 2026/1024 of the European Parliament and of the Council of 29 April 2026 amending Directive (EU) 2015/2302 to make the protection of travellers more effective and to simplify and clarify certain aspects of that Directive, OJ L, 2026/1024, 8 May 2026	https://eur-lex.europa.eu/eli/dir/2026/1024/oj/eng
11, 26	Court of Justice of the European Union, M.D. v "Tez Tour" UAB (Tez Tour), Case C-299/22, judgment of 29 February 2024	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62022CJ0299
11, 26	Court of Justice of the European Union, QM v Kiwi Tours GmbH (Kiwi Tours), Case C-584/22, judgment of 29 February 2024	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62022CJ0584
15, 17	European Court of Auditors, Air passenger rights during the COVID-19 pandemic: Key rights not protected despite Commission efforts, Special Report 15/2021, 2021 (paras 55-61, Annex IV)	https://op.europa.eu/webpub/eca/special-reports/passenger-rights-15-2021/en/
19	European Commission, Register of Commission expert groups and other similar entities (Package Travel Directive Expert Group, 12 June 2018 - 20 December 2024)	https://ec.europa.eu/transparency/expert-groups-register/
20	European Commission, Report to the European Parliament and the Council on the application of Directive (EU) 2015/2302 on package travel and linked travel arrangements, COM(2021) 90 final, 26 February 2021	https://commission.europa.eu/document/download/68c2a885-b91c-47e3-ac31-f36669241f47_en

Notes	Source	Link
22	Commission Recommendation (EU) 2020/648 of 13 May 2020 on vouchers offered to passengers and travellers as an alternative to reimbursement for cancelled package travel and transport services in the context of the COVID-19 pandemic, OJ L 151, 14 May 2020	https://eur-lex.europa.eu/eli/reco/2020/648/oj/eng
24	Council of the EU, Package travel, policy page (negotiating mandate, December 2024)	https://www.consilium.europa.eu/en/policies/package-travel/
27	Court of Justice of the European Union, Bundesarbeitskammer v HDI Global SE and A, B, C, D v MS Amlin Insurance SE (HDI Global and MS Amlin), Joined Cases C-771/22 and C-45/23, judgment of 29 July 2024	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62022CJ0771
31	Court of Justice of the European Union, Union fédérale des consommateurs - Que choisir and CLCV v Premier ministre and Ministre de l'Économie, des Finances et de la Relance (UFC-Que choisir), Case C-407/21, judgment of 8 June 2023	https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62021CJ0407
32	European Economic and Social Committee, Revision of the package travel directive, opinion INT/1049-EESC-2023-05478, 24 April 2024	https://www.eesc.europa.eu/en/our-work/opinions-information-reports/opinions/revision-package-travel-directive

B. Additional official sources for further reading

	Source	Link
-	Directive (EU) 2015/2302 of the European Parliament and of the Council of 25 November 2015 on package travel and linked travel arrangements, amending Regulation (EC) No 2006/2004 and Directive 2011/83/EU of the European Parliament and of the Council and repealing Council Directive 90/314/EEC, OJ L 326, 11 December 2015	https://eur-lex.europa.eu/eli/dir/2015/2302/oj
-	European Commission, Package travel - Stronger rights for travellers and simpler rules for the travel industry, news item, 28 May 2026	https://commission.europa.eu/news-and-media/news/package-travel-stronger-rights-travellers-and-simpler-rules-travel-industry-2026-05-28_en