

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



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