



## Green Claims: Priorities of the Travel and Tourism Sector

Ahead of the next formal trilogue negotiations on the proposal for a Directive on Green Claims taking place on 24 April 2025, the travel and tourism industry would like to highlight its priorities on the file.

We support the Commission's intention to strengthen consumer protection against greenwashing and false environmental claims. **However, businesses and destinations should not feel demotivated to perform in a greener way, due to administrative or costly procedures.** A balanced system must be found, one that allows companies and DMOs to easily apply the rules and provide consumers with informed choices.

To reach this objective, our priorities are the following:

### 1 - Simplification of substantiation and verification procedures

- Substantiation of the claims based on **the life cycle and recognised scientific evidence**, makes it almost impossible for companies in the tourism sector to promote their sustainable services. It is **too costly and burdensome**, and companies do not have the **legal and environmental knowledge** to do so. Moreover, companies run the risk of, within a few years, being prosecuted by a court or enforcement body (as currently there are no recognised scientific methods companies can follow to substantiate the claims).
- The verification of each claim by a third party in view of certification is also a costly procedure.

### Proposed solution by the travel and tourism industry

- Before the entry into force of the Directive, the Commission should release:
  - A list of explicit environmental claims that, given their nature, typically do not require substantiation or verification of the green claim (**self-declaration system**).
  - Free-of-charge sector-specific compliance toolkits and technical guidance tailored to the tourism sector's realities.
  - Companies holding an existent environmental label should be exempted from substantiating and verifying their claims.

## 2 - Micro-enterprises must be exempted from the scope of the Directive

- The Commission impact assessment shows that micro-enterprises would face additional costs and burdens. This is against the EU institution's trend of boosting businesses' competitiveness.
- Micro-enterprises should at least be included as part of a **presumption of conformity**.

## 3 - Small and medium-sized enterprises (SMEs) and destinations should receive support for implementation

- Any **support measures**, such as access to finance, support for specialised management and staff training, should be made mandatory for SMEs and destination management organisations. The size and turnover of traders should be considered.
- **Digital tools** should be made available, such as the life cycle assessment calculation, to facilitate implementation.
- The lack of legal and environmental knowledge by SMEs, as well as the cost and administrative burdens fully justify this approach.

## 4 - Penalties must be proportionate

- Penalties should consider the nature, gravity, extent and duration of the infringement. However, they must be proportionate and balanced.
- Article 17/3 should be eliminated, as proposed by the Council. The Commission proposal is too strong (e.g., penalties can include confiscation of revenues, exclusion from access to public funding). Ultimately, Member States should decide on their penalties.

## 5 - New public and private schemes should be allowed

The travel and tourism industry is constantly innovating, particularly in sustainability. New sustainability labels often introduce criteria or processes that reflect the evolving market.

- **New private and public labels**, which display new relevant criteria or contain new ideas for businesses to be more sustainable, **should be allowed** to the extent that they are compliant with the new requirements under the Green Claims Directive.
- Competition will lead to innovation.
- Previously established legal schemes **should continue to be in effect**, as they have fulfilled all necessary procedures.

The travel and tourism industry calls on the Council and the European Parliament to reach a compromise that is **feasible for companies and destinations to comply with**. Any other solution will put at risk the implementation of environmentally friendly practices and the green transition of the EU tourism ecosystem.

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### About the Travel and Tourism Organisations

**ECTAA** represents the interests of 80.000 travel agents and tour operators in Europe, which provide consultancy and sell transport, accommodation, leisure and other tourism services as well as combined products to leisure and business customers.

**EFCO&HPA** is the representative body at European level working for all businesses with caravans, tents, motorhomes, chalets and all forms of self-catering accommodation in the park setting. Membership is made up of national trade associations from 23 European countries.

**HOTREC** – the European Hospitality Association – serves as the voice of Europe’s hotels, restaurants, bars and cafés, uniting 47 member associations across 36 countries. Together, we represent 2 million businesses that support over 10 million jobs. Hospitality and tourism are vital drivers of the economy, contributing around 10% of the EU’s GDP. Importantly, 90% of our establishments are micro-enterprises, predominantly family-owned, highlighting their essential role in sustaining local communities.

**NECSTouR** is the Network of European Regions for Sustainable and Competitive Tourism, representing more than 40 European regional tourism authorities and more than 30 associated members (universities, research institutes, representatives of tourism enterprises and sustainable tourism associations). Based in Brussels, it develops Interregional Projects and fosters cooperation to enable Sustainable Tourism Governance in Europe.

**RURALTOUR** – the European Federation of Rural Tourism – is the professional tourism trade organisation representing a sector with an estimated 500.000 micro and nano enterprises and about 6 million bed places. It includes 28 professional and trade organisations from 25 European countries. The represented services include hospitality from rural Bed & Breakfast and self-catering, short term rentals in private homes or farms, to small family-run rural hotels or guesthouses, as well as rural gastronomy and active tourism services.