Tourist services – short-term rental initiative

Introduction

In its [SME Strategy](#) of March 2020, the Commission announced an **initiative on short-term accommodation rental services**. The Commission's Staff Working Document (SWD(2021) 164 final) proposes scenarios towards the co-creation of a [transition pathway](#) for a more resilient, innovative and sustainable tourism ecosystem. This document mentions a possible legislative proposal for improving the framework for short-term accommodation rental services ('STR') among other actions to be explored.

STR refers to the **provision of accommodation, typically on a daily or weekly basis, principally for short stays by visitors. The accommodation can take the form of a furnished room or an entire apartment or house, with possible access to other facilities and services.** Hotels and campsites are not considered [STRs](#).

STR have grown in recent years as an alternative offer to **more traditional accommodation such as hotels or campsites**. STRs may be offered by **private individuals on an occasional basis ('peers')**, but STRs can also be provided more **professionally**, for example by businesses using property bought for this purpose specifically or individuals who make the property available on a regular basis. **Online booking platforms** play a key role in connecting hosts and guests across the EU, and STRs are supported by a growing number of providers of various services, such as **management, reception and cleaning services**. STR have created new opportunities for hosts, guests and a range of new service providers, most of which are SMEs. However, the rapid growth of the STR segment has also given rise to **concerns** related to the sustainable development of cities, consumer safety and level regulatory playing field.

Many authorities across the EU have taken initiatives to regulate STRs. They have imposed requirements such as **registration** and **authorisation** schemes on hosts, and have imposed restrictions such as **limitations** on the number of nights per year properties can be rented out. Whilst doing so, some national rules make a difference between so-called '**peers**' offering STRs in a private capacity occasionally, and those offering STRs in a more **professional** capacity. Criteria differ however and not everywhere a distinction is made between peers and professionals. Authorities have also taken a variety of measures to **obtain better data** from platforms, with a view to better assessing the volume of STRs and facilitating law enforcement.

The foregoing has resulted in a [patchwork of varying rules and regulations](#).

Under EU law, imposing restrictions and conditions on the provision of a service can be justified if necessary to pursue a legitimate public interest objective and proportionate to achieve that end. In spite of important clarifications offered by EU case law, there is still much uncertainty regarding the measures authorities may adopt and enforce as regards hosts and other service providers such as platforms.

EU horizontal regulatory initiatives such as the Digital Services Act aim to impose harmonised obligations on online platforms, including collaborative economy platforms in the area of STRs. However, in order to foster a balanced development of the STR segment in the EU and to address the sector-specific aspects, a dedicated sector-specific initiative may be needed.

The Commission is initiating a process for analysing and collecting evidence, as well as a stakeholder consultation for identifying whether there are issues that would benefit from intervention by the EU. This consultation covers a series of topics related to the environment of STR and aims to consult all types of stakeholders about challenges in this sector as well as possible measures to address these challenges. The consultation contains questions grouped in four thematic parts:

1. General market information
2. Issues related to transparency
3. Issues related to market access restrictions
4. Any other issues

You may respond to one, several or all of the modules. At the end of the questionnaire, you will also be able to upload a document, if you wish to do so, including examples of non-confidential agreements that you may have entered into to address the issues that are raised in this questionnaire. You may also flag other issues not specifically covered in the questionnaire.

The Commission seeks precise data and information about your particular experiences, perceptions and judgements and/or informed opinions about the potential impacts of options for further action. The Commission will analyse the data and preferences in evaluating the status quo, the scope and scale of problems for stakeholders, as well as preferences or different policy options.

About you

*Language of my contribution
- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian

- ○ Irish
- ○ Italian
- ○ Latvian
- ○ Lithuanian
- ○ Maltese
- ○ Polish
- ○ Portuguese
- ○ Romanian
- ○ Slovak
- ○ Slovenian
- ○ Spanish
- ○ Swedish

*First name

*Surname

*Email (this won't be published)

*I am giving my contribution as
- ○ Academic/research institution
- ○ Business association
- ○ Company/business organisation
- ○ Consumer organisation
- ○ EU citizen
- ○ Environmental organisation
- ○ Non-EU citizen
- ○ Non-governmental organisation (NGO)
- ○ Public authority
- ○ Trade union
- ○ Other

* Scope

- ○ International
- ○ Local
- ○ National
- ○ Regional

* Level of governance

- ○ Local Authority
- ○ Local Agency

* Level of governance

- ○ Parliament
- ○ Authority
- ○ Agency

* Organisation name

255 character(s) maximum

* Organisation size

- ○ Micro (1 to 9 employees)
- ○ Small (10 to 49 employees)
- ○ Medium (50 to 249 employees)
- ○ Large (250 or more)

* What is the annual turnover of your company?

- ○ Micro (<=2m EUR)
- ○ Small (<=10m EUR)
- ○ Medium (<= 50m EUR)
- ○ Large (more than 50m EUR)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

*Country of origin

Please add your country of origin, or that of your organisation.

- Afghanistan
- Åland Islands
- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda

- Djibouti
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece

- Libya
- Liechtenstein
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique

- Saint Martin
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname

○ Bhutan	○ Greenland	○ Myanmar/Burma	○ Svalbard and Jan Mayen
○ Bolivia	○ Grenada	○ Namibia	○ Sweden
○ Bonaire Saint Eustatius and Saba	○ Guadeloupe	○ Nauru	○ Switzerland
○ Bosnia and Herzegovina	○ Guam	○ Nepal	○ Syria
○ Botswana	○ Guatemala	○ Netherlands	○ Taiwan
○ Bouvet Island	○ Guernsey	○ New Caledonia	○ Tajikistan
○ Brazil	○ Guinea	○ New Zealand	○ Tanzania
○ British Indian Ocean Territory	○ Guinea-Bissau	○ Nicaragua	○ Thailand
○ British Virgin Islands	○ Guyana	○ Niger	○ The Gambia
○ Brunei	○ Haiti	○ Nigeria	○ Timor-Leste
○ Bulgaria	○ Heard Island and McDonald Islands	○ Niue	○ Togo
○ Burkina Faso	○ Honduras	○ Norfolk Island	○ Tokelau
○ Burundi	○ Hong Kong	○ Northern Mariana Islands	○ Tonga
○ Cambodia	○ Hungary	○ North Korea	○ Trinidad and Tobago
○ Cameroon	○ Iceland	○ North Macedonia	○ Tunisia
○ Canada	○ India	○ Norway	○ Turkey
○ Cape Verde	○ Indonesia	○ Oman	○ Turkmenistan
○ Cayman Islands	○ Iran	○ Pakistan	○ Turks and Caicos Islands
○ Central African Republic	○ Iraq	○ Palau	○ Tuvalu
○ Chad	○ Ireland	○ Palestine	○ Uganda
○ Chile	○ Isle of Man	○ Panama	○ Ukraine
○ China	○ Israel	○ Papua New Guinea	○ United Arab Emirates
○ Christmas Island	○ Italy	○ Paraguay	○ United Kingdom
○	○	○	○

○ Clipperton	○ Jamaica	○ Peru	○ United States
○ Cocos (Keeling) Islands	○ Japan	○ Philippines	○ United States Minor Outlying Islands
○ Colombia	○ Jersey	○ Pitcairn Islands	○ Uruguay
○ Comoros	○ Jordan	○ Poland	○ US Virgin Islands
○ Congo	○ Kazakhstan	○ Portugal	○ Uzbekistan
○ Cook Islands	○ Kenya	○ Puerto Rico	○ Vanuatu
○ Costa Rica	○ Kiribati	○ Qatar	○ Vatican City
○ Côte d'Ivoire	○ Kosovo	○ Réunion	○ Venezuela
○ Croatia	○ Kuwait	○ Romania	○ Vietnam
○ Cuba	○ Kyrgyzstan	○ Russia	○ Wallis and Futuna
○ Curaçao	○ Laos	○ Rwanda	○ Western Sahara
○ Cyprus	○ Latvia	○ Saint Barthélemy	○ Yemen
○ Czechia	○ Lebanon	○ Saint Helena Ascension and Tristan da Cunha	○ Zambia
○ Democratic Republic of the Congo	○ Lesotho	○ Saint Kitts and Nevis	○ Zimbabwe
○ Denmark	○ Liberia	○ Saint Lucia	

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

*Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

○ **Anonymous**

The type of respondent that you responded to this consultation as, your

country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself.

○ **Public**

Your name, the type of respondent that you responded to this consultation as, your country of origin and your contribution will be published.

* **Contribution publication privacy settings**

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

○ **Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

○ **Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☐ I agree with the [personal data protection provisions](#)

Categories of respondents

In order to better tailor the questions that will be asked to you in the following sections, please select the specific category of respondent that you belong to:

* Are you a / an:

○ Hotels and other similar tourist enterprises other than short term rentals type of accommodation and their associations

○ Online booking platforms (generally meaning online platforms which connect potential guests with hosts offering short-term accommodation services), travel agencies and their associations

○

Other service providers (e.g. property management, cleaning, maintenance, reception, whether or not they also intermediate transactions between hosts and potential guests through an electronic platform)

○ Individual Host

○ Professional Host

○ Public Authority

○ Other (please specify)

*Other (please specify)

255 character(s) maximum

I. General market information

This module will gather general market information from stakeholders active in the short-term rental sector.

*Is one of the following your primary activity?

○ Operation of an independent hotel

○ Operation of a hotel which is part of a hotel chain

○ Other (please specify)

*Other (please specify)

255 character(s) maximum

*Is one of the following your primary activity?

○ Operation of an online booking platform

○ Operating a travel agency

○ Other (please specify)

*Other (please specify)

255 character(s) maximum

*

Is one of the following your primary activity?

- ○ Providing catering to hotels/STR
- ○ Providing cleaning services to hotels/STR
- ○ Providing accounting/fiscal services to hotels/STR
- ○ Providing other services to hotels/STR
- ○ Other (please specify)

*Please explain what kind of services

255 character(s) maximum

[ ]

*Other (please specify)

255 character(s) maximum

[ ]

*Do you gain a significant part of your customers/revenue from services requested by hosts and/or by referrals from online booking platforms?

- ○ Yes
- ○ No
- ○ I don't know

What type of accommodation do you offer?

	Urban area	Rural area	Not Applicable
* Room(s) in my main residence (apartment or house)	☐	☐	☐
* The entirety of my main residence (apartment or house)	☐	☐	☐
* An apartment or house other than my main residence	☐	☐	☐
* Several apartments or houses other than my main residence	☐	☐	☐
Other, please specify	☐	☐	☐

Other (please specify)

255 character(s) maximum

[ ]

Which means do you use to offer your STR services?

	Yes	No
* Large platforms	○	○
* Small/local platforms	○	○
* Word of mouth/offline means	○	○
* A combination of the foregoing	○	○
Other (please specify)	○	○

Large platforms (if possible, please specify which platform)

255 character(s) maximum

Small/local platforms (if possible, please specify which platform)

255 character(s) maximum

Word of mouth/offline means (please specify)

255 character(s) maximum

A combination of the foregoing (please specify)

255 character(s) maximum

Other (please specify)

255 character(s) maximum

* Do you offer STR or online booking services (e.g. rent out a room/apartment /house, offer an online booking platform/service) in your 'EU' country of residence /place of establishment?

○ Yes

○ No

* In how many locations in your country of residence/place of establishment do you offer STR or online booking services? (if you do not have this information, please input "NA")

255 character(s) maximum

* Do you offer STR or online booking services (rent out a room/apartment/house or offer an online booking platform/service) in another 'EU' country, that is not your country of residence/place of establishment (i.e. operate across country borders)?

- ○ Yes
- ○ No

* Please specify in how many EU Member States you operate (if you do not have this information, please input "NA")

255 character(s) maximum

What are the costs (e.g. time, resources) associated with finding and complying with obligations in different Member States or in different places within a single Member State (please specify which costs and provide an estimate of the costs; if you do not have this information, please input "NA")

255 character(s) maximum

* For which reasons: (multiple replies possible)

- ☐ I am not interested in operating in several Member States/across country borders
- ☐ It would be too costly to expand my business in other Member States/across country borders
- ☐ I don't know which rules apply in other Member States and I prefer not to take any risks
- ☐ There are too many rules that apply in other Member States
- ☐ Other (please specify)
- ☐ Not applicable

* Other (please specify)

255 character(s) maximum

*Do you use providers of other services or are you considering doing so? (e.g. property management, cleaning, maintenance, reception…)

- ○ Yes
- ○ No

*Please specify which one

255 character(s) maximum

*Do you help arrange other services (offered by external providers) for hosts (e.g. cleaning services, property management, key management…)?

- ○ Yes
- ○ No

*Please indicate what percentage of STR transactions over the past three years included other services (e.g. cleaning services, key management…) (if you do not have this information, please input "NA")

255 character(s) maximum

Impact of the COVID crisis

*What has been the impact of the COVID crisis on your activity? (please specify the type of impact and if possible quantify; if you do not have this information, please input "NA")

Roughly, how many of the below operate in your local area? (if you don't know the answer, please input "NA")

	Hotels	STR Hosts	Online Booking platforms
*1			*1

* Please specify and if possible, quantify the economic impact (costs and benefits) of STR in your area (for example, in terms of tax revenues, SMEs creation, impacts on the price of housing, local economic development, cost for the public administration, etc.). (if you do not have this information, please input "NA")

> [   ]

* Please specify and if possible, quantify the social impact (costs and benefits) of STR in your area (e.g. employment, welfare of guests/hosts/local communities) (if you do not have this information, please input "NA")

> [   ]

* Please specify and if possible, quantify the environmental impact (costs and benefits) of STR in your area (e.g. impact on pollution or waste) (if you do not have this information, please input "NA")

> [   ]

* How has the COVID crisis changed these impacts? (if you do not have this information, please input "NA")

> [   ]

* Did the COVID crisis induce you to adopt/adjust rules for STR? If so, which ones? (if you do not have this information, please input "NA")

> [   ]

General questions

In your view, what are the typical characteristics of "short-term accommodation rentals"?

	Strongly agree	Somewhat agree	Neutral	Somewhat disagree	Strongly disagree	I don't know /no opinion
* It includes the provision of accommodation, typically on a daily or weekly basis principally for short stays by visitors	○	○	○	○	○	○
* It includes the provision of accommodation, for periods longer than on a daily or weekly basis (e. g. on a monthly basis), principally for short stays by visitors	○	○	○	○	○	○
* It includes furnished rooms or entire apartments or houses	○	○	○	○	○	○
* It excludes the provision of furnished short-stay accommodation with daily cleaning, bed-making, food and beverage services	○	○	○	○	○	○

* What do you consider to be the main benefits generated by STR overall? (multiple replies possible)

- ☐ There are no benefits
- ☐ It is an additional source of income for citizens
- ☐ It is an alternative to more traditional accommodation offers
- ☐ It caters to unfulfilled tourism needs (e.g. low-income tourists, (large) families)
- ☐ It creates employment
- ☐ It attracts visitors
- ☐ It encourages investment in local services (e.g. housing, tourism, transport)
- ☐ Other (please specify)

* Other (please specify)

255 character(s) maximum

[   ]

* What do you consider to be the main drawbacks of STR overall? (multiple replies possible)

- ☐ There are no drawbacks
- ☐ It increases the price of renting or buying housing in cities
- ☐ It decreases the availability of housing for rent or sale in cities
- ☐ It raises security issues (e.g. theft)
- ☐ It increases nuisance for local residents
- ☐ It has a negative economic impact on traditional accommodation providers (e. g. hotels)
- ☐ Other (please specify)

* Other (please specify)

255 character(s) maximum

[   ]

II. Issues related to transparency

The STR segment is characterised by a lack of transparency. Online booking platforms often have data on STRs but, except in the field of taxation, do not share it on a systematic and consistent basis with public authorities across the EU.

This is often due to, amongst others, uncertainty regarding the applicable rules, lack of consistent and systematic requests from public authorities and privacy concerns. Public authorities find it difficult, to assess the exact volume of STRs; in addition, law enforcement is rendered difficult where authorities are not in a position to assess who rents out what.

To address a lack of transparency, many authorities have started putting in place registration schemes for hosts. Such schemes may be combined with other requirements and arrangements designed to gather information and data, notably from platforms.

Online booking platforms, for their part, have entered into voluntary arrangements, notably with Eurostat, which is collecting statistical data on STRs, and with certain cities/Member States. Such arrangements have contributed to more transparency but may not address all needs.

This module will gather information on what type of data on short-term rentals might be needed and why, what data is currently obtained and the means by which it is shared. Data can be non-personal data (i.e. aggregated and anonymised) or personal data (e.g. identity of hosts, address of the accommodation being rented out).

*What type of data would you need to **design** appropriate rules on STR (for policy making)?

255 character(s) maximum

*What type of data would you need to **enforce** appropriate rules on STR?

255 character(s) maximum

Do you have access to this data?

	Yes	No
* Non-personal, aggregated data on the number of STR and number of nights rented out	○	○

* Personal data on who rents what and how often	◎	◎

Why do you not have access to this Non-personal data? (multiple replies possible)

- ☐ I don't know where to find the data sources
- ☐ There is no appropriate legal framework allowing data sharing
- ☐ Existing data sources do not cover the data I need for policy making
- ☐ Online booking platforms do not respond to our requests
- ☐ Online booking platforms do not have the data available
- ☐ Lack of internal resources
- ☐ It has a cost
- ☐ Other (please specify)

* Please specify the cost (if you do not have this information, please input "NA")

* Other (please specify)

255 character(s) maximum

* Why do you not have access to this Personal data? (multiple replies possible)

- ☐ There is no appropriate legal framework allowing data sharing
- ☐ Online booking platforms do not respond to our requests
- ☐ Online booking platforms do not have the data available
- ☐ Online booking platforms are unable to share the data, for example, due to data privacy concerns
- ☐ Lack of internal resources
- ☐ It has a cost
- ☐ Other (please specify)

* Please specify the cost (if you do not have this information, please input "NA")

* Other (please specify)

255 character(s) maximum

What would you use the following data for?

	Policy Making	Enforcement	Other
* Non-personal, aggregated data on the number of STR and number of nights rented out	☐	☐	☐
* Personal data on who rents what and how often	☐	☐	☐

How do you get access to this data? (Tick all that are relevant)

	Using publicly available data	Using private / commercial data	From hosts	From online booking platforms	Other
* Non-personal, aggregated data on the number of STR and number of nights rented out	☐	☐	☐	☐	☐
* Personal data on who rents what and how often	☐	☐	☐	☐	☐

* Is it on a voluntary or mandatory basis?
- ○ Voluntary
- ○ Mandatory
- ○ Don't know/no opinion

* How often do you request data?
- ○ Yearly
- ○ Every six months
- ○ On a real time basis (for example through APIs)
- ○ Other, please specify

* Other (please specify)

255 character(s) maximum

* Please specify

255 character(s) maximum

* Have you specified the format in which the data is sent to you?
- ○

Yes

No

*Other (please specify)

255 character(s) maximum

[   ]

*Are hosts required to share data with you?

Yes

No

*If you obtain data from the hosts, please explain how (if you do not have this
information, please input "NA")

[   ]

*If you do not obtain the required data from the hosts, please explain why (if you do
not have this information, please input "NA")

[   ]

*Please specify the costs of obtaining relevant data (please specify the type of cost
and quantify; if you do not have this information, please input "NA")

[   ]

*Do you collect or receive data from hotels?

Yes

No

*Please specify which type of data and how you get this data (if you do not have this
information, please input "NA")

[   ]

*Please specify the costs of having to implement a EU registration scheme at
national or local level (please specify the type of cost and if possible, quantify; if
you do not have this information, please input "NA")

[   ]

* Are you required to share information on short-term rentals with public authorities?

○ Yes

○ No

* What type of information and how is it gathered? (multiple replies possible)

☐ I have to register with local authorities and provide information in that context

☐ I share information when complying with tax obligations

☐ Other (please specify)

Other (please specify)

255 character(s) maximum

If you completed a registration procedure, please share your experience for each of the following

	Strongly agree	Somewhat agree	Neutral	Somewhat disagree	Strongly disagree	I don't know /no opinion
* The procedure was clear and simple to understand	◉	◉	◉	◉	◉	◉
* The procedure could be completed online	◉	◉	◉	◉	◉	◉
* The procedure was quick to complete (please give an indication of the amount of time spent to complete it)	◉	◉	◉	◉	◉	◉
* I had to provide a large number of documents	◉	◉	◉	◉	◉	◉
* Registration numbers were issued automatically after completion of the procedure	◉	◉	◉	◉	◉	◉
* The procedure was expensive	◉	◉	◉	◉	◉	◉
* The procedure needs to be repeated/updated frequently (e.g. I have to renew my registration)	◉	◉	◉	◉	◉	◉

Please indicate the cost of the procedure if available

Please indicate how frequently the procedure needs to be repeated / updated, if available

*Are you required to share data on bookings with public authorities?

○ Yes

○ No

*What type of data do you share? (multiple replies possible)

☐ Non-personal, aggregated data (e.g., on the number of nights rented out)

☐ Personal data on who rents what and how often

☐ Other

*Other (please specify and indicate all types of STR data that your company shares)

*Do you share data with public authorities from at least one Member State?

○ Yes

○ No

*Do you share STR data with public authorities from <u>more than one</u> Member State (if you share data with public authorities from <u>only one</u> Member State, please select "no")?

○ Yes

○ No

*Please specify the costs of having to comply with different requirements on data sharing of different Member States (please specify the type of cost and quantify; if you do not have this information, please input "NA")

* Could you give an indication of the level of diversity between the requirements of the Member States with which you share data:
- ○ No difference in requirements
- ○ Low difference
- ○ Significant difference

* Please explain why not (multiple replies possible)
- ☐ I have not received any requests so far
- ☐ I have received requests but I do not have the data requested by the public authority
- ☐ I have received requests but I cannot legally share the data requested (e.g. I have concerns about GDPR compliance)
- ☐ I have received requests but I believe that they are unlawful
- ☐ I have received requests but I believe that I am not subject to the jurisdiction of the relevant Member State(s)
- ☐ Other (please specify)

Other (please specify)
255 character(s) maximum

* Please specify the type of public authorities (e.g. tourism authorities, tax authorities, consumer protection authorities, etc.) which requested the data that you share. Please also specify if the authorities that you share data with are local, regional or national authorities (if you do not have this information, please input "NA")

* Is your STR data sharing with public authorities on a voluntary or mandatory basis?
- ○ Voluntary
- ○ Mandatory
- ○ It depends on the data
- ○ Other (please specify)

* Other (please specify)

255 character(s) maximum

[ ]

* What type of STR data do you share? (multiple replies possible)

☐ Non-personal, aggregated data (e.g., on the number of nights rented out)

☐ Personal data on who rents what and how often

☐ Other (please specify)

* Other (please specify and indicate all types of STR data that your company shares)

[ ]

* How often do you share data? (multiple replies possible)

☐ Yearly

☐ Every six months

☐ Upon request by public authorities (e.g. ad hoc requests)

☐ On a real time basis (for example through APIs)

☐ Other, please specify

* Please specify how many requests you receive on average per year (if you do not have this information, please input "NA")

255 character(s) maximum

[ ]

* Other, please specify

255 character(s) maximum

[ ]

* What is the average time it takes to respond to a request for data? Please insert number of days (if you do not have this information, please input "NA")

255 character(s) maximum

[ ]

* Is the data exchange automated?

◉ Yes

◉ No

*

Insert the number of people and/or departments who are required to prepare a response (if you do not have this information, please input "NA")

[   ]

* Please give an indication of the average cost incurred to respond to these requests (if you do not have this information, please input "NA")

[   ]

Other costs (please specify)

[   ]

* Are you subject to obligations to cooperate with public authorities to enforce existing STR rules (e.g. obligation to display registration numbers, delist listings without a registration number) in the area where you operate?

  ○ Yes
  ○ No
  ○ I don't know

* Please specify which obligations apply to you

[   ]

* Please give an indication of the costs to comply with such rules (in particular in terms of time and resources needed; if you do not have this information, please input "NA")

[   ]

General Questions

* Are you aware of the voluntary agreement between Airbnb, Booking, Expedia Group, Tripadvisor and EUROSTAT to share data on the STR sector?

  ○ Yes
  ○ No

* Do you consider it useful?

  ○ Yes
  ○ No

*Why? (multiple replies possible)

- ☐ It can be used to design/discuss public policy on STRs
- ☐ It can be used to develop new business models or services that support short term rentals (if selected, could you please give examples/use cases where this data has facilitated the emergence of new business models)
- ☐ Other, please specify

*Other (please specify)

255 character(s) maximum

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*Why? (multiple replies possible)

- ☐ The data does not contain sufficient detail
- ☐ The data is too limited (e.g. it only covers four online booking platforms)
- ☐ I do not know how to use the data
- ☐ Other, please specify

*Other (please specify)

255 character(s) maximum

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With regards to the possible ways public authorities get access to the data they need to design/enforce rules on STR, what is your view on the following:

	Strongly agree	Somewhat agree	Neutral	Somewhat disagree	Strongly disagree	I don't know /no opinion
*They should not get access to such data	○	○	○	○	○	○
*They should carry out checks and enforcement actions directly on the ground	○	○	○	○	○	○
*They should obtain it directly from the (registered) hosts	○	○	○	○	○	○
*They should get it from the online booking platforms, upon request	○	○	○	○	○	○

* They should get it from the online booking platforms, periodically	○	○	○	○	○	○

Do you see any other possible way for public authorities to get the data referred to in the previous question?

[ ]

* In your view, do you see merit in a registration obligation for hosts as a tool to increase transparency on STR?

○ Yes
○ No
○ I don't know

Please specify the impact(s) you would expect

[ ]

* Do you believe that host registration systems would be more effective if organised:

○ At EU level
○ At national level
○ At regional/local level
○ At national/regional/local level based on an EU template

Do you see merit in a more harmonised approach to host registration schemes within the EU?

	Strongly agree	Somewhat agree	Neutral	Somewhat disagree	Strongly disagree	I don't know/ no opinion
* I see merit in having one single registration scheme at EU level, but it should replace existing local/national registration schemes	○	○	○	○	○	○
* I see merit in having national/local registration schemes aligned to an EU standard	○	○	○	○	○	○

	Strongly agree	Somewhat agree	Neutral	Somewhat disagree	Strongly disagree	I don't know /no opinion
* I see merit in having an optional EU standard for national/local registration schemes	○	○	○	○	○	○
I see no merit in having a harmonised approach at EU level	○	○	○	○	○	○

* Do you see merit in requiring online booking platforms to share data on STRs with public authorities?

- ○ Yes
- ○ No
- ○ I don't know

Please specify the impact(s) you would expect

[   ]

* Should such requirement(s) be put in place/facilitated at EU level?

- ○ Yes
- ○ No

What would be the most appropriate way to facilitate the sharing of data by online booking platforms with public authorities:

	Strongly agree	Somewhat agree	Neutral	Somewhat disagree	Strongly disagree	I don't know /no opinion
Obligation for hosts and booking platforms to display the registration number when advertising a property	○	○	○	○	○	○
Development of technical tools at EU level (such as application programming interfaces, 'APIs')	○	○	○	○	○	○
Development of a standard format to share data	○	○	○	○	○	○

| Development of harmonised rules for sharing such data (type of data, frequency) | ⊚ | ⊚ | ⊚ | ⊚ | ⊚ | ⊚ |

Do you see any other possible way to facilitate the sharing of data by online booking platforms with public authorities?

[ ]

*If data sharing rules were adopted, do you consider that some online booking platforms should benefit from an exemption (e.g. start-ups, platforms with low revenues, etc.)?

  ⊚ Yes

  ⊚ No

  ⊚ I don't know

*Please specify which type of platforms should benefit from an exemption and why (if you do not have this information, please input "NA")

[ ]

*Do you consider that online booking platforms should assist the enforcement activities of public authorities?

  ⊚ Yes

  ⊚ No

Please specify how:

[ ]

III. Issues related to market access restrictions

This module will seek to gather stakeholders' views and experiences on the current conditions to access the market for STR, and on the business development opportunities in the internal market.

The module will hence seek the views of stakeholders on the possible options to address market access barriers, as well as on the cost and burden of each option. It will also inquire about the perceptions of stakeholders on the degree to

which there is currently a level playing field between different types of STR accommodation providers and between STR providers and other accommodation providers.

For the purposes of this questionnaire, registration means that the host must simply notify the public authority before the host starts to offer a property for STR and the host is allowed to rent out the property immediately after having submitted the registration.

For the purposes of this questionnaire, authorisation means that the host is required to take steps in order to obtain a formal/implied/tacit decision from a competent authority before the host may start to offer a property as a STR.

* What did you need to do to offer STR services? (possibility to give further information for each option and multiple replies possible)

- ☐ I could start my activity immediately after creating my profile on the online booking platform
- ☐ I had to register with public authorities before starting my activity
- ☐ I had to obtain a prior authorisation[s] from public authorities
- ☐ It is not possible to provide STR in my city/country
- ☐ Other (please specify)
- ☐ I don't know

Please specify

255 character(s) maximum

If you were required to obtain an authorisation, please share your experience

	Strongly agree	Somewhat agree	Neutral	Somewhat disagree	Strongly disagree	I don't know /no opinion
* The conditions for obtaining the authorisation were clear, made public in advance, transparent and accessible	○	○	○	○	○	○

32

* The procedure could be completed online	○	○	○	○	○	○
The procedure was quick to complete (please give an indication of the time spent completing it)	○	○	○	○	○	○
* I had to provide a large number of documents	○	○	○	○	○	○
* The application for authorisation was processed quickly	○	○	○	○	○	○
* The procedure was expensive (please indicate the cost if available)	○	○	○	○	○	○
* The authorisation is granted for an unlimited period	○	○	○	○	○	○

* What other rules are applicable to you as a host? (multiple replies possible)

☐ No rules

☐ A limit on the number of nights I can rent out per year

☐ A limit on the number or type of rooms/apartments/houses I can rent out

☐ A limit on the number or type of rooms/apartments/houses that can be rented out in a defined area

☐ Health & safety requirements/consumer protection rules

☐ Other, please specify

☐ I don't know

* Other (please specify)

255 character(s) maximum

* Who imposes these other rules? (multiple replies possible)

☐ The city or local authorities

☐ The regional authorities

☐ The national authority

☐ I do not know

*

Overall, do you consider the existing rules on STR in your country/region/city to be clear, necessary and proportionate (e.g. rules suitable to attain the objective pursued)?

- ○ Yes
- ○ No
- ○ I don't know
- ○ Not applicable

* If no, please specify any rules that you consider to be unsuitable and give reasons.

If any, what are the obstacles you face in intermediating STR?

	Yes	No	Not applicable
* No obstacles	○	○	○
* Different rules applying in different Member States (if you operate cross-border or would like to do so)	○	○	○
* Complexity of rules applying within Member States	○	○	○
* Different rules applying in different cities/regions within Member States	○	○	○
* Complexity of rules compared to other more traditional services, such as hotels	○	○	○
* Other (please specify)	○	○	○

* Other (please specify)

255 character(s) maximum

If you qualify as micro or small enterprise (SME), please explain whether you have faced difficulties to grow and expand your business cross-border, and what are the causes

If any, what are the obstacles you face in providing your services to hosts / online booking platforms?

	Yes	No	Not applicable
* No obstacles	○	○	○
* Different rules applying in different Member States (if you operate cross-border or would like to do so)	○	○	○
* Complexity of rules applying within Member States	○	○	○
* Different rules applying in different cities/regions within Member States	○	○	○
* Other (please specify)	○	○	○

* Other (please specify)

255 character(s) maximum

If you qualify as micro or small enterprise (SME) , please explain whether you have faced difficulties to grow and expand your business cross-border, and what are the causes

* If any, what are the rules that you have to comply with in order to start your activity?

* If any, what are the rules that you have to comply with in order to exercise your activity?

* Who imposes these rules or restrictions? (multiple replies possible)

☐ The city or local municipality

☐ The regional authorities

☐ The national authority

☐ I do not know

* Do you apply conditions and restrictions to STRs?

- ○ Yes
- ○ No
- ○ I don't know

* Please explain why not

[   ]

* What public interest objectives do you pursue when regulating STR (multiple replies possible)?

- ☐ Availability and affordability of housing
- ☐ Protection of the urban environment
- ☐ Security and safety
- ☐ Public health
- ☐ Other (please specify)
- ☐ Do not know/no opinion

* Other (please specify)

255 character(s) maximum

[   ]

* What type of rules does your authority apply to STRs (multiple replies possible):

- ☐ Registration for hosts
- ☐ Authorisation for hosts
- ☐ Different rules for professional hosts and those that rent out properties occasionally
- ☐ Rules for online booking platforms
- ☐ Total ban of STRs in certain areas
- ☐ Other (please explain)

* Please specify the different rules for professional hosts and those that rent out properties occasionally (if you do not have this information, please input "NA")

[   ]

*

Please specify the rules for online booking platforms, if any (if you do not have this information, please input "NA")

[ ]

*Other (please explain)

[ ]

*Please specify the costs of applying and enforcing this rule/system (if you do not have this information, please input "NA")

[ ]

*How do you enforce the rules? (multiple replies possible)
- ☐ Checks and physical inspections, with fines or other penalties
- ☐ Requesting online booking platforms to remove illegal listings (voluntary cooperation)
- ☐ Requiring online booking platforms to remove illegal listings (legal obligation)
- ☐ I cannot enforce the rules
- ☐ Other (please specify)

*Please explain why you cannot enforce the rules (if you do not have this information, please input "NA")

[ ]

*Other (please specify)

[ ]

*Have the legality of the rules in question been challenged in courts?
- ○ Yes
- ○ No
- ○ I don't know

*Please explain why and what was the outcome

[ ]

What is your opinion on the following statements?

	Strongly agree	Somewhat agree	Neutral	Somewhat disagree	Strongly disagree	I don't know /no opinion
* I know which public policy objectives I can pursue, in line with EU law	○	○	○	○	○	○
* I know how to ensure that my policies are proportionate, in line with EU law	○	○	○	○	○	○
* I am aware of Court of Justice rulings and their implications for my policy on STRs	○	○	○	○	○	○
* I am aware of policies developed in other Member States relating to STRs	○	○	○	○	○	○
* I would welcome further clarity at EU level on the characteristics that registration/authorisation schemes for STR should comply with	○	○	○	○	○	○

General Questions

In your view, what type of rules and requirements for STR could be acceptable?

	Strongly agree	Somewhat agree	Neutral	Somewhat disagree	Strongly disagree	I don't know / no opinion
* Registration obligation for all hosts (provision of STR service possible automatically after filling in the registration form of public authorities)	○	○	○	○	○	○
* Authorisation requirements for all hosts (provision of STR service only possible after the public authorities have granted the authorisation)	○	○	○	○	○	○
* Authorisation requirements for professional STR hosts only (provision of STR service on a professional basis only possible after the public authorities have granted the authorisation)	○	○	○	○	○	○
* Limit on the number of nights the room/apartment /house is rented out per year for occasional hosts ('peers')	○	○	○	○	○	○

* Limit on the amount of income that occasional hosts ('peers') may generate from STR	◎	◎	◎	◎	◎	◎
* Limit on the number of rooms/apartments /houses rented out by occasional hosts ('peers')	◎	◎	◎	◎	◎	◎
* Total ban on STR	◎	◎	◎	◎	◎	◎

Do you see merit in a more harmonised approach to authorisation schemes for STR hosts within the EU?

	Strongly agree	Somewhat agree	Neutral	Somewhat disagree	Strongly disagree	I don't know / no opinion
* I see merit in having national/local authorisation schemes aligned to an EU standard scheme	○	○	○	○	○	○
* I see merit in having an optional standardised format at EU level	○	○	○	○	○	○
* I see merit in having EU criteria that national/local authorisation schemes must comply with	○	○	○	○	○	○
* I see no merit in having a harmonised approach at EU level	○	○	○	○	○	○

* Do you think that 'peers' should be subject to the same rules and requirements as professional providers?
○ Yes
○ No
○ I don't know

* If 'peers' and professional STR hosts were to be treated differently, what should be the basis for the distinction? (multiple replies possible):
☐ Whether or not the STR activity is the main occupation of the host
☐ Threshold based on the level of income generated by the STR activity
☐ The property rented out is a primary or secondary residence of the host
☐ The number of rooms/apartments/houses rented out by the host
☐ The number of nights the room/apartment/house is rented out per year
☐ The number of guests that are hosted in the room/apartment/house
☐ Other (please specify)

* Other (please specify)
255 character(s) maximum

[   ]

* In your view, how should the criteria referred to in the question above, distinguish between 'peers' and professional STR hosts, be enforced?

[   ]

In your view, what would be the costs associated with a distinction between peers and professionals? Please specify the type of cost and if possible, please quantify.

[   ]

In your view, what would be the costs associated with the absence of distinction between peers and professionals? Please specify the type of cost and if possible, please quantify.

[   ]

* Do you think that professional STR hosts should be subject to comparable rules as hotels?

○ Yes
○ No
○ I don't know

What other types of rules could be put in place to ensure a level playing field between professional STR hosts and hotels?

[   ]

IV. Any other issues

* Is there any other issue that you see the STR sector is facing, and that has not been addressed by the previous questions? Please specify (if you do not have this information, please input "NA")

[   ]

* Are there any other measures that you think could support innovation in the STR and the development of new business models? Please specify (if you do not have this information, please input "NA")

[   ]

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Final comments