



## Revision of the Package Travel Directive

This briefing provides an initial analysis of the strengths and weaknesses of the European Commission's [impact assessment](#) (IA) accompanying the [proposal](#) to revise [Directive \(EU\) 2015/2302](#) (PTD) on package travel and linked travel arrangements. The proposal aims to strengthen the rights of travellers and improve insolvency protection.<sup>1</sup> It was referred to the European Parliament's Committee on the Internal Market and Consumer Protection (IMCO).

### KEY FINDINGS

The IA underpins the revision of the Package Travel Directive with a qualitative and quantitative analysis, which relies on a wealth of data sources. It identifies the problems and their drivers, and presents alternative policy options to address them. However, a further illustration of the scale of the problems and a clearer indication of the limitation thresholds of prepayments in all policy options would have been useful. As required in the Better Regulation Guidelines (BRG), the IA assesses the economic, social and environmental impacts of the policy options, and compares the options against the BRG criteria of effectiveness, efficiency and coherence. It also offers sufficient justification for the choice of the preferred option. As the large majority of package organisers (99 %) are small and medium-sized enterprises (SMEs), an SME test was duly performed. Furthermore, the methodology used – including a price sensitivity analysis and multi-criteria methods – is explained in detail. The IA openly admits limitations in quantifying impacts due to the unavailability of quantitative data. The external study supporting the IA does not appear to be easily accessible, which reduces transparency. Overall, the legislative proposal appears to follow the preferred option of the IA.

## Background

This initiative, included in the [2022 Commission work programme](#) (REFIT initiatives), was first announced in the Commission's [2020 communication](#) on the new consumer agenda. The proposal was put forward as part of the '[passenger mobility package](#)' on 29 November 2023.

## Problem definition

The IA first describes the existing EU regulatory framework, in particular Directive (EU) [2015/2302](#) on package travel and linked travel arrangements (LTAs) (hereafter PTD), which aims to ensure a high level of protection for travellers and promote fair competition in the internal market. The IA also mentions the relevant complementary legislation, for instance Regulation (EC) No [261/2004](#) on air passenger rights (APRR), and describes the economic context of package travel in brief. The package travel sector is estimated to account for 10.5 % of the travel and tourism market (2023 data), amounting to a market volume of €96.4 billion in the EU-27 (IA, pp. 1–6).

Even though the PTD has improved consumer protection and created a level playing field for businesses, the Commission's [2021 report on the application of the PTD](#) highlighted a number of difficulties in its application. These include issues with refunds and effective insolvency protection in the event of a major crisis, and complexity and uncertainty caused by the provisions on LTAs (i.e. two or more travel services purchased from different traders in separate contracts for the purpose of the same trip).<sup>2</sup> The IA also mentions the lack of rules on vouchers, specifically addressing uncertainties surrounding insolvency protection coverage for vouchers and refund claims for



cancelled packages. In this context, it highlights challenges that resulted from the 2019 Thomas Cook bankruptcy and the COVID-19 pandemic. Owing to the COVID-19-related travel restrictions, the travel market saw mass cancellations of package travel arrangements at a scale that could no longer permit organisers to satisfy refunding entitlements (IA, p. 4).

The [2022 Fit for Future Platform Opinion](#) identified a need to clarify certain PTD provisions (e.g. the pre-contractual information requirements, uncertainties relating to insolvency protection, the definitions for a package, LTAs and other tourist services). Moreover, the Commission conducted an ex-post evaluation of the existing PTD in parallel with the IA ('back-to-back'); it was published as Annex 13 of the IA (pp. 179-393). This evaluation concluded, among other things, that the PTD has been only partially effective, and also stressed the need for more clarification, for example, in relation to prepayments and the definitions of certain concepts.

Drawing on an external Commission study supporting both the IA and the ex-post evaluation (by the [ICF](#), 'not yet published', IA, p. 1), the above-mentioned reports and the stakeholder consultation, the IA identifies **three main problems** (Ps), which are interlinked and have a cumulative impact on the effectiveness of the PTD (IA, pp. 6-24).

- **P1: Travellers face difficulties in recovering prepayments for cancelled packages, in particular in the event of a major crisis.** Under the PTD, travellers and organisers have the right to cancel packages free of charge in the event of unavoidable and extraordinary circumstances. Travellers are entitled to a full refund of any payments made for the package within 14 days from the termination of the contract. According to the IA, in practice, organisers use travellers' prepayments to pay for travel services. Therefore, organisers may face liquidity problems in case of cancellation if confronted with many concurrent refund requests, and service providers do not refund organisers swiftly enough. This also increases the risk of delays in reimbursement to travellers. According to the Commission's report on the application of the PTD, travellers had been having problems in recovering prepayments for cancelled packages as per the PTD requirement already before COVID-19 times. In this respect, the IA estimates that around 4.4 % of package travellers experienced a financial loss in 2017.<sup>3</sup> The challenge of recovering prepayments became a particular issue during the COVID-19 pandemic, when travel organisers themselves suffered huge losses (estimated at €15 billion for 2020 and 2021) and therefore tended to postpone or deny refunding prepayments to their customers, often offering vouchers instead of cash refunds.<sup>4</sup> The IA mentions that travellers from all Member States had 'major difficulties' in recovering prepayments within 14 days for cancelled travel packages, and quotes the [European Consumer Organisation](#), according to which 'half of European households lost money' (IA, pp. 7-13, 34).
- **P2: Prepayments made by travellers are not sufficiently protected against insolvency of the organiser.** According to the IA, the diverse insolvency protection systems across the EU do 'not necessarily imply that travellers are less well protected in some Member States than in other ones or that there is a potential distortion of competition in the EU' (p. 14). Nonetheless, the evaluation found that the Member States' different insolvency protection systems 'could potentially' affect the effectiveness of the PTD (IA, p. 14). The IA could have further explained this finding; it merely states that 'the current degree of harmonisation has left scope for different implementation in the Member States, leading to certain variations in the level of consumer protection and, consequently, in the costs for businesses' (not quantified) (p. 18). In addition, the IA points out that it is not clear whether pending travellers' refund claims and vouchers are covered by the insolvency protection systems in accordance with the PTD in cases where the package is cancelled before an organiser becomes insolvent. In this context, the IA mentions two cases for a preliminary ruling taken to the Court of Justice of the EU (CJEU) ([C-771/22 HDI Global](#) and [C-45/23 MS Amlin Insurance](#); the Court joined the cases and issued its [ruling](#) on 29 July 2024). The IA also

draws attention to insufficient insurance solutions for travellers in the market; those available for travellers usually cover only certain personal risks and not gaps in insolvency protection (IA, pp. 13–18).

- **P3: Difficulties in implementing the directive.** The IA mentions issues, in particular with regard to the interpretation of certain concepts, such as [click-through-package](#), unavoidable and extraordinary circumstances and LTAs, and the enforcement of the rules relating to them. It notes that differences in implementation negatively affect the functioning of the package travel market and lower the level of consumer protection. The IA mentions that uncertainties related to LTAs have led to 'abuse by traders' (not quantified), which, in some cases, have deprived travellers of their rights under the PTD by changing their booking processes/business models to avoid being considered package organisers. While the IA depicts this problem in detail, it could have further illustrated its scale (IA, pp. 15, 18–24, 27).

The IA also identifies the underlying **problem drivers** (pp. 24–28):

- **Drivers relating to P1:** The typical business model of service providers and package travel organisers relies on prepayments. Organisers request travellers to pay a large part of the travel package in advance, to finance their bookings with service providers (e.g. hotels, airlines). However, during the COVID-19 crisis, many organisers lacked sufficient liquidity to reimburse travellers' pre-payments. Similarly, travel service suppliers either reimbursed organisers with delay or not at all. The IA points out that the PTD does not regulate the business-to-business (B2B) effects of the termination of package travel contracts. Moreover, there is a legal uncertainty about the use of vouchers, which is not specifically regulated in the PTD.
- **Drivers relating to P2:** The IA mentions that there is legal uncertainty about whether vouchers and refund claims are protected against an organiser's insolvency. In addition, differences exist in Member States' national insolvency protection systems. In some Member States, package travel organisers find it difficult to obtain insolvency protection (prepayments, repatriation) due to insufficient insurance solutions.
- **Drivers relating to P3:** Certain provisions in the PTD contain gaps, lack sufficient clarity or are too complex. Examples include: the definitions for LTAs, the cancellation rules in the case of unavoidable and extraordinary circumstances, the complexity of the standard information forms, and the role of different parties (package travel organisers, retailers and service providers).

While the IA, as per the [Better Regulation Guidelines](#) (BRG), identifies the problems and their drivers, the description could be clearer at times. For example, the same elements are discussed under P2 and its drivers (e.g. national differences, insufficient insurance solutions). Moreover, under P2 and P3, an illustration of the scale of the problem could have been strengthened.

## Subsidiarity / proportionality

The proposed **legal basis** of the initiative is Article 114 of the Treaty on the Functioning of the EU (TFEU), the same as for the current PTD. With regard to **subsidiarity**, the IA underscores the need and added value of EU action, pointing to the cross-border dimension of package travel for both consumers (travellers) and travel organisers. It argues that the initiative would address the identified problems, as well as clarify and simplify certain provisions of the PTD. This would improve the functioning of the internal market by ensuring more uniformity in the application of the directive. The IA further highlights the initiative's compliance with the **proportionality** principle, as it would be 'limited to aspects of travel law for which EU action is necessary' (IA, p. 30).

The accompanying [subsidiarity grid](#) provides additional reasoning with regard to subsidiarity and proportionality, and highlights the targeted nature of the proposed amendments. The deadline for

the **national parliaments to do a subsidiarity check** ended on 14 March 2024. No national parliament issued a reasoned opinion under Article 6 of [Protocol No 2](#) on the application of the principles of subsidiarity and proportionality by that date.

## Objectives of the initiative

According to the IA, the **general objective** of the initiative is to 'strengthen the level of consumer protection, at all times, including in the event of a major crisis, while improving the functioning of the internal market in the package travel sector' (p.30).

To tackle the problems identified, the IA defines **three specific objectives (SOs)** (p. 31):

- **SO 1:** Better protection of travellers' prepayments and their right to a swift refund of prepayments in the event of cancellations, including in times of a major crisis, while maintaining the liquidity of package organisers (P1);
- **SO 2:** Better protection of travellers against the organisers' insolvency, including in times of a major crisis, while ensuring a level playing field in the internal market (P2);
- **SO 3:** Increased legal certainty and enforceability by clarifying and/or simplifying certain provisions of the directive that are interpreted or applied differently or are difficult to apply in practice (P3).

Contrary to the BRG recommendation, the IA does not break down the specific objectives into operational objectives after selecting the preferred option, something that could have undermined the measurability of the objectives. However, as the IA provides a number of measurable monitoring indicators (pp.86-87), the objectives appear to follow the requirements of being specific, measurable, achievable, relevant and time-bound (S.M.A.R.T.) (BRG Toolbox, [Tool #15](#)).

## Range of options considered

The IA presents **three policy options (POs)** in addition to a dynamic **baseline** scenario. The options are linked to the defined problems and the specific objectives. The IA points out that, like the problems and specific objectives, the proposed measures are interlinked. The options offer real alternatives: the IA characterises PO A as a minimal cost solution, PO B as a middle-solution, and PO C as a maximal effectiveness and a high-cost solution. The IA also explains the **options discarded** at an early stage, and states the reasons for discarding them (IA, pp. 31-45).

Overall, the IA describes the measures and options in a balanced manner. However, for ease of reading, the IA could have stated the limitation thresholds for prepayments in all options as clearly as it does in PO B (20 %). In particular, PO C only mentions a 'strict limitation' but not the threshold. This element is clearer in the [summary](#) of the IA, which defines the thresholds in all options: PO A includes 25 % and PO B 20 % for travel organisers, and PO C includes 20 % for both travel organisers and service providers. Similarly, the explanatory memorandum of the legislative [proposal](#) indicates the thresholds for all options (pp. 9-10) when explaining the main elements of the IA. With regard to the range of alternative measures, the offer appears limited under P2, as each policy option presents only one measure, and under PO A and PO B the proposed measure is the same.

<b>P1: Travellers face difficulties in recovering prepayments for cancelled packages, in particular in the event of a major crisis.</b>	PO A	PO B	PO C
1.1.1. Flexible limitation of prepayments: the organiser would retain the flexibility to ask for prepayments higher than the threshold (25%), where justified	x		
1.1.2. Strict limitation of prepayments: no flexibility for organisers, the maximum prepayment for travellers would always be 20 %		x	
1.1.3. Strict limitation of prepayments (20 %) to organisers and service providers: would limit prepayments between travellers and organisers, and between organisers and service providers			x

1.2.1. Regulatory option to set up a crisis fund at the Member State level	x		
1.2.2. Mandatory rapid refund mechanism at the Member State level			x
1.3.1. Business-to-business (B2B) refund right if service not performed: service providers obliged to refund to organiser all prepayments within 7 days from the cancellation	x		
1.3.2. Business-to-business (B2B) refund right if the package travel is cancelled: service providers obliged to refund to organiser all prepayments within 7 days from the cancellation			x
1.4.1. Voluntary vouchers at all times: travellers are entitled to a refund within 14 days but may accept a voucher	x		
1.4.2. Mandatory vouchers in crises: vouchers would be permitted only during a crisis and travellers have to accept them instead of a refund		x	
<b>P2: Prepayments made by travellers are not sufficiently protected against insolvency of the organiser</b>	PO A	PO B	PO C
2.1. Strengthened rules on national insolvency protection systems (incl. cover of vouchers and refund claims + explicit reference to voluntary back-up funds at the Member State level)	x	x	
2.2. Mandatory insolvency back-up funds at the Member State level			x
<b>P3: Clarification and/or simplification</b>	PO A	PO B	PO C
3.1.1. Deletion of LTAs type (a) and adaptation of the definitions of package (click-through package, single-point-of-scale package) and of LTAs type (b)	x		
3.1.2. Deletion of LTAs type (b), adapting the definition of click-through package and clarifying LTAs type (a)		x	
3.1.3. Deletion of LTAs type (b). LTAs type (a) and the definition of click-through-package to be adapted. LTAs type (a) and the definition of single-point-of-purchase package remain unchanged.			x
3.2.1. Clarification of cancellation rights + case-by-case assessment of travel warnings	x	x	
3.2.2. Clarification of cancellation rights + formal value of travel warnings			x
3.3.1. Clarification of the role of the parties	x		
3.3.2. Clarification of the role of the parties and several liability organisers and retailers for refunds			x

Source: Compiled by the authors on the basis of the IA (pp. 32, 38-45) and its summary (p. 2). The preferred policy option A is highlighted in grey.

## Assessment of impacts

In accordance with the BRG requirements, the IA assesses the policy options' economic, social and environmental impacts. The assessment is quantitative, to the extent possible, and qualitative (IA, pp. 45-76). In terms of **economic impacts**, the IA assesses costs and savings for travel organisers, service providers, retailers, travellers (consumers) and public authorities. It identifies benefits, for instance, for travellers from lower prepayments (liquidity gain) and for organisers as a result of the B2B refund measure (organisers' liquidity). The simplification and clarification of the PTD provisions would have a positive impact on all stakeholders. The IA also estimates costs for organisers and service providers from the limitations placed on prepayments and transposition costs for public authorities.

When assessing **social impacts**, the IA specifically considers how the proposal would affect consumer (traveller) protection. It expects that potential increases in costs for organisers and

service providers resulting from the reduced amount of money required as prepayment, would translate into price increases for packages, i.e. these costs would be passed on to consumers. At the same time, travellers would benefit from improved consumer protection, as limiting prepayments would reduce travellers' risks of delayed or lost reimbursements (and hence the amount to be refunded).

The IA finds that all options, expected to neither increase nor reduce the overall travel volume, are consistent with the **environmental** objectives set by the [European Green Deal](#) and the [European Climate Law](#), and are therefore in line with the 'do no significant harm' principle (p. 45).

According to the IA, the initiative would not have negative or limiting effects on **fundamental rights**; it seeks to strike a balance between consumer rights and the right to conduct business in the area of package travel (IA, p. 145). The IA also considers the **'digital by default' principle** and finds that all options would have a neutral impact on digitalisation (p. 46).

The IA compares and scores the policy options against the BRG criteria of effectiveness, efficiency and coherence. It finds Option C to be the most **effective** option in achieving the specific objectives, especially owing to the mandatory nature of the measures. Option A scores best in terms of **efficiency** (costs and benefits; only partially quantified) and **coherence** with other relevant EU transport legislation, such as the revision of the passenger rights and the APRR (e.g. rules applicable to stand-alone services, insolvency protection) (pp. 59–63, 65–68, 74–85).

The IA concludes that **the preferred option is Option A**, as it provides a balanced and the most proportionate solution with regard to the objectives, means and methods. In particular, it would bring benefits for travellers and businesses at lowest costs (IA, pp. 81–85). According to the IA, the 'overall economic impact of the preferred option is thus expected to be positive or at least neutral for all stakeholders' (p. 83). The IA presents the estimates of costs (partially quantified) and benefits (partially quantified) of the preferred option (IA, Annex 3, pp. 117–123).

### SMEs / Competitiveness

The IA refers to the ex-post evaluation, according to which approximately 99% of the package travel agencies, tour operators and other reservation services (112 000 companies) in the EU are small and medium-sized enterprises (SMEs) (2019 data). It specifies that 94% of these companies were micro businesses. Consequently, as required by the BRG, an **SME test** was performed (BRG Toolbox, [Tool # 23](#)). A dedicated Annex 6 of the IA briefly explains the main elements of the four-step test. Regarding mitigating measures, such as transition periods, the IA considers that, as the large majority of organisers are SMEs, it would not be justified to set different transition periods based on the size classes of companies (IA, pp. 46, 84–85, 137–138).

The IA describes the impacts that the preferred option is expected to have on competitiveness in a dedicated Annex 5. This **competitiveness check** focuses on the aspects of cost and price, SMEs, international competitiveness and capacity to innovate. It finds, for example, that the B2B refund right would positively affect package travel organisers (liquidity gain) and would not lead to changes in international competitiveness, as non-EU organisers offering packages to EU consumers would have to apply the revised PTD. In addition, the IA explains that possible obstacles to recover funds from non-EU service providers could prompt organisers to give preference to EU service providers (e.g. airlines) (IA, pp. 48, 52, 83–84, 134–136).

### Simplification and other regulatory implications

The IA briefly and qualitatively (without quantified estimates) discusses the expected reduction in burden resulting from the improved legal clarity and simplification of this REFIT initiative (p. 85).

When assessing the **'one in, one out'** (OIOO) approach (BRG Toolbox, [Tool #59](#)), the IA identifies administrative cost savings of €181.4 million per year (recurring) for travel organisers (stemming from the deletion of LTAs type (a) and simplification measures) and one-off administrative costs of €6.5 million for businesses to familiarise themselves with the new provisions (IA, pp. 85, 117–123).

In addition, the IA discusses how this initiative relates to the existing EU legislation (e.g. [Air Passenger Rights Regulation](#), [Consumer Protection Cooperation Regulation](#)) and new initiatives (e.g. [passengers' rights proposal](#) as part of the mobility package, and the [proposal on insolvency](#)) (IA, pp. 2-6, 59-68, 74-85, 171-177). The IA also mentions that the initiative contributes to three UN [Sustainable Development Goals](#) (SDGs): 8, 10 and 16 (IA, pp. 5, 45).

## Monitoring and evaluation

The IA presents a monitoring plan with relevant and quantifiable monitoring indicators, including indicators of success, which are linked to the specific objectives. The IA indicates the data sources for each indicator, such as stakeholder surveys and feedback from the Commission's PTD Expert Group. It mentions that the collected data could feed into a Commission report five years after the directive is adopted, and could also underpin 'subsequent evaluations' (not specified) (pp. 85-87).

## Stakeholder consultation

The IA describes the stakeholder consultation activities in a dedicated Annex 2 (pp. 100-116), as required in the BRG. The consultations were carried out as widely as possible to collect data, relevant input and evidence on the needs of various stakeholder groups (e.g. travellers/consumers, tour operators, travel agencies, carriers, national authorities, insolvency protection funds, consumers and business associations, academia and non-governmental organisations).

The [inception impact assessment](#) ran from 6 August 2021 to 17 September 2021, and an [open public consultation](#) (OPC) from 15 February 2022 to 10 May 2022, meeting the 12-week BRG requirement. Various targeted stakeholder consultations included surveys, workshops, interviews and expert meetings. Further input was received from the [Fit for Future Platform](#).

The IA describes stakeholder groups' views on policy measures throughout in the IA. Their views on some measures differ from each other. For example, while consumer organisations supported limiting prepayments, companies (small and large) stressed the importance of prepayments, stating that a strict limitation would increase costs. Companies' participation in the OPC is broken down based on their size class: out of the total 520 responses, 323 came from companies (62%). Among these, 310 (96%) were SMEs (249 micro-, 43 small- and 18 medium enterprises). There were also 13 responses from large companies (IA, p. 100). However, the description of the targeted consultations lacks such differentiation.

## Supporting data and analytical methods used

The IA draws on a wealth of data sources, such as a study supporting the evaluation and the IA (conducted by ICF S.A.), an ex-post evaluation, a PTD application report, the ECA [special report 15/2021](#), the Fit for Future Platform [opinion](#) and stakeholder consultations. According to the IA, the above-mentioned supporting study was 'not yet published' at the time the proposal was issued. It still does not appear to be easily accessible at the time of writing, which is an issue of transparency.

The IA describes the methodology used, including multi-criteria methods, in a dedicated Annex 4 (pp. 124-133). Furthermore, it explains the price sensitivity in Annex 8 (pp. 140-142), the results of the benefits and costs analysis, the scoring of options and the sensitivity analysis in Annex 10 (pp. 147-170). The IA openly explains limitations in quantifying impacts, citing reasons such as the unavailability of quantitative data for LTAs and the inability of SMEs and consumer organisations to provide quantified estimates (IA, pp. 55, 58, 60, 74, 81, 97-98, 137).

## Follow-up to the opinion of the Commission Regulatory Scrutiny Board

The Regulatory Scrutiny Board (RSB) examined an earlier version of the draft IA and issued a negative [opinion](#) on 7 June 2023. The successive revision received a positive [opinion](#) with

reservations on 28 September 2023. The RSB stressed in particular the need to further clarify the overall impact on consumers and to better demonstrate the rationale for the intervention, including its added value. It also considered that the potential impact on international competitiveness needed to be explained more by better substantiating it with quantitative evidence.

As required by the BRG, the IA explains in Annex 1 how it has addressed the RSB's comments, and it appears that these have been duly addressed. However, regarding the quantification of the impact on competitiveness, the IA indicates only the number of affected businesses, while impacts are qualitatively assessed due to the limited availability of data (IA, pp. 46–52, 80–84, 88–97, 134–136).

## Coherence between the Commission's legislative proposal and IA

It appears that the legislative proposal follows the preferred option.

### ENDNOTES

- <sup>1</sup> See also C. Evroux, [Package travel and linked travel arrangements: Improving protection for travellers](#), EPRS, European Parliament, February 2024. For details on the implementation of the current legal framework, see T. Jansen, [Revision of the Package Travel Directive](#), EPRS, European Parliament, February 2024.
- <sup>2</sup> Under Article 3(5) of the [PTD](#), there can be two types of LTAs. **Type (a)**: 'A trader facilitates the separate selection and separate payment of each travel service by travellers on the occasion of a single visit or contact with his point of sale'. **Type (b)**: 'a trader facilitates in a targeted manner, the procurement of at least one additional travel service from another trader where a contract with such other trader is concluded at the latest 24 hours after the confirmation of the booking of the first travel service' (see also IA, p. 2, 178).
- <sup>3</sup> The IA supporting study (ICF) estimates travellers' losses to amount to between €540 million and €1.6 billion in a normal year; it also provides an alternative estimate for a yearly consumer detriment at between €126 million and €378 million (IA, pp. 7, 34).
- <sup>4</sup> The Court of Justice of the European Union found the voucher practice to be unlawful (travellers are not obliged to accept vouchers) (Case [C-407/21 UFC – Que choisir and CLCV](#) and [Case C-540/21 European Commission v Slovak Republic](#)).

This briefing, prepared for the Committee on the Internal Market and Consumer Protection (IMCO), analyses whether the principal criteria laid down in the Commission's own Better Regulation Guidelines, as well as additional factors identified by the Parliament in its Impact Assessment Handbook, appear to be met by the IA. It does not attempt to deal with the substance of the proposal.

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