

Tourism Unit,
DG MOVE
European Commission,
Rue Demot 28 / Demotstraat 28
1040 Brussels, Belgium

RE: GBTA comments regarding the PEFCR for hotel accommodation

Brussels, 14 March 2025

For the attention of the Tourism Unit, DG Move, European Commission,

On behalf of the [Global Business Travel Association \(GBTA\)](#), representing business travel professionals (buyers and suppliers) in Europe and globally, I am sending you this letter as an attachment to our response to the public consultation on first draft Product Environmental Footprint Category Rules (PEFCR) for hotel accommodation.

We sincerely appreciate the European Commission's efforts to develop a comprehensive Life Cycle Assessment (LCA) method for quantifying the overall environmental impacts of hotel accommodation, as well as the opportunity for the industry to contribute to its development.

Why this quantification and harmonisation effort matters so much for business travel

The only way we can make progress and achieve our decarbonisation goals in the accommodation sector is by having a universal definition of what good looks like, and a **transparent and comparable way to track progress and communicate it with investors and customers.**

The customer perspective is critical, as they act as the demand signal for more sustainable accommodation services. Business travellers spend more money on lodging than any other vertical (over €400 billion per year), and hotel procurement makes up a massive part of managed travel programs, with travel managers often assessing thousands of hotel RFP (Request for Proposal) responses every year. And now more than ever, **largely due to reporting obligations and due diligence in the supply chain, corporate travel managers and buyers want transparent information about emissions data, water and waste footprint, biodiversity efforts and so on.**

When GBTA launched its [Sustainability Initiative](#) three years ago, we asked our thousands of global members – all business travel professionals – one question: what's the biggest opportunity to accelerate climate action in travel? **And the number one facilitator cited by two thirds of respondents was 'harmonised standards'** [to measure the environmental performance of corporate travel programs AND corporate travel suppliers – including hotels]. This is why we welcome the EU's effort to deliver progress on this front.

Concerns with the fact that existing global industry standards are not being taken into account

As part of the PEFCR effort, we are asking the Commission to further **consider existing standards that the industry has developed and has been using for years**. While these standards need to be updated and strengthened to bring them in line with a full LCA analysis, they provide a strong baseline and starting point.

In particular, the **most widely-used methodology and tool for hotel carbon measurement, the [Hotel Carbon Measurement Initiative \(HCMI\)](#), has been available since 2012**. This methodology was developed by the Sustainable Hospitality Alliance and the World Travel & Tourism Council (WTTC), in collaboration with 23 leading global hospitality companies. It has been tested in hotels of different styles and sizes in different geographical locations and further refined following subsequent stakeholder engagement. It was updated in 2016 and 2022 following further feedback from users and research by Cornell University's Center for Hospitality Research, as well as the support of Greenview. HCMI is already being used by over 30,000 hotels globally, and provides robust, transparent and comparable data. In addition, work is underway to make sure the HCMI methodology is updated to integrate a full life cycle analysis (LCA) approach. GBTA is working closely with industry partners WSHA and Travalyst on these updates and continues to support the use of HCMI as the go-to methodology for calculating a hotel's emission footprint.

In addition, global corporate travel customers are now rallying around the [GBTA Sustainable Procurement Standards](#), developed in collaboration with the industry for three years and released last year. With a specific set of standards for accommodation, this consolidated bank of sustainability questions for procurement enables corporate travel buyers to assess the sustainability efforts of their hotels in a consistent and harmonised manner. As an industry-wide, open-source solution, the standards give corporate travel buyers the tools to make procurement decisions and deliver on their sustainability objectives.

Scope misalignments and the need for a strong and streamlined global approach

At the moment, the scope of the PEFCR is not aligned with the GBTA Sustainable Procurement Standards. Some specific challenges include:

- The fact that short-term rentals and service apartments, including those used for extended stays, are not covered by the PEFCR. This undermines comparability within the sector.
- The fact that food & beverage programs, as well as efforts to provide sustainable modes of transportation to and from the hotel are not part of the hotel's footprint assessment.

To make sure scopes are aligned, we ask for the European Commission to take into consideration the schemes already developed and used by the industry. This would make the rules as streamlined as possible, align the EU's approach with existing standards used at the global level and facilitate compliance by the sector, most of which is composed of small and medium-sized businesses (SMEs).



Thank you in advance for considering our suggestion and we remain at your disposal should you have any questions. We look forward to continuing our cooperation with you for the next five years.

Yours sincerely,

Delphine Millot
Senior Vice President for Advocacy and Sustainability,
Global Business Travel Association (GBTA)

The [Global Business Travel Association \(GBTA\)](https://www.gbta.org) is the world's leading business travel and meetings trade organisation, serving stakeholders across six continents. GBTA and its 8,500+ members represent and advocate for the €1,35 trillion (\$1,48 trillion USD) global business travel and meetings industry. GBTA and the GBTA Foundation deliver world-class education, events, research, advocacy, and media to a growing global network of more than 28,000 travel professionals and 125,000 active contacts. For more information, visit [gbta.org](https://www.gbta.org) and [gbtafoundation.org](https://www.gbtafoundation.org).