VISITA

SWEDISH HOSPITALITY INDUSTRY

2026





Swedish Hospitality in a stronger Europe







Introduction

A competitive, sustainable and open European visitor economy

Visita represents more than 6,000 Swedish hospitality businesses, ranging from restaurants and hotels to ski resorts, amusement parks and contract catering companies. The sector is an important employer, integration engine and contributor to Sweden's visitor economy, employing more than 200,000 people. EU policy increasingly shapes the conditions under which these businesses operate, whether through rules on digital platforms, labour mobility, consumer protection, packaging, payments or tourism data.

Europe needs a visitor economy that is competitive, sustainable and resilient. This requires regulation that is evidence-based and proportionate, effective enforcement of rules already in place, and stronger recognition of the different conditions facing destinations across Europe.

Visita will work with Swedish and European partners to ensure that EU policy supports growth, innovation, quality jobs and sustainable tourism throughout the Union.

"EU policy should be evidence-based, developed in early dialogue with affected sectors and implemented proportionately. Sweden must be present and influential where EU policy is shaped."



1. A stronger European tourism; Strengthening Sweden's Role and Influence

Tourism policy must reflect the diversity of Europe. While some destinations face severe visitor pressure, other regions need better connectivity, a longer season, access to skills and conditions for sustainable growth. This is particularly relevant for Sweden and other sparsely populated northern regions, where long distances, seasonality and limited transport connections shape the visitor economy.

The EU's tourism work should therefore balance the management of overcrowded destinations with measures that enable development in regions that are underutilised or at risk of being left behind. The Commission has itself highlighted the need to balance these different destination challenges and improve the use of timely data, digital tools and skills in tourism.

Visita calls for:

- **A stronger and more visible Swedish role in EU tourism policy, including sustained participation in relevant Council, Commission and Nordic forums.**
- **A tourism strategy that recognizes the needs of northern, rural and sparsely populated regions, including transport connectivity, season extension and workforce needs.**
- **Better representation of Swedish and Nordic expertise in EU expert groups.**
- **Improved tourism data on visitor flows, travel patterns, transport modes, accommodation, purpose of travel, spending and seasonality, to support better policy at both EU and national level.**
- **A short-term rental reform that closes regulatory gaps, ensures a level playing field between accommodation providers and preserves fair competition.**



2. A competitive and predictable regulatory framework

A competitive visitor economy depends on regulation that is clear, proportionate and workable in practice. Small and medium-sized enterprises form the backbone of hospitality and tourism, but are least able to absorb administrative complexity, overlapping obligations and short implementation deadlines.

EU competitiveness is shaped not only by what legislation requires, but also by how laws are designed, negotiated, implemented and enforced. Businesses need realistic transition periods, meaningful consultation and national implementation that does not create avoidable additional burdens.

Visita calls for:

- **Mandatory and transparent impact assessments for substantial legislative proposals and material amendments.**
- **Early, structured dialogue between the Swedish Government and the visitor economy on relevant EU files.**
- **Consultation processes that are accessible to SMEs, predictable in timing and adapted to seasonal sectors.**
- **Sufficient implementation periods and practical guidance before new obligations apply.**
- **Strong Swedish safeguards against gold-plating and unnecessary administrative[1] burdens in national implementation, supported by the Implementation Council.**
- **A review of public-procurement rules that promote fair competition, facilitate SME [2] participation, and place greater emphasis on quality, sustainability and value for money rather than lowest price alone.**

1. The Implementation Council's task is to bring the business perspective into the EU policy process at an early stage and to ensure that EU legislation is not implemented in Sweden beyond the minimum requirements. The aim is to reduce the regulatory burden on businesses, administrative costs, and other compliance costs arising from forthcoming, new and amended EU legislation.
2. Small and medium-sized enterprises, as defined in Commission Recommendation 2003/361/EC: enterprises employing fewer than 250 persons and with annual turnover not exceeding €50 million and/or an annual balance-sheet total not exceeding €43 million.



3. Fair digital markets, consumer rules and payments

Digital platforms, payment systems and data are essential to the visitor economy. Hotels, restaurants and tourism businesses rely on online travel agencies, delivery and reservation platforms, and cross-border payment solutions to reach customers and manage bookings, pre-authorizations, no-shows and post-stay charges.

Fair digital markets require transparent terms, effective enforcement, and meaningful access to business data. Consumer rules should tackle genuine harm without duplicating existing obligations or restricting legitimate practices such as dynamic pricing and yield management. Payment solutions — including a future digital euro — must be practical, interoperable, and cost-effective for businesses operating across borders.

Visita calls for:

- **Effective platform enforcement. Enforce the DMA[3], DSA[4] and P2B Regulation[5] against unfair parity clauses, opaque ranking, excessive fees, fake reviews and unjustified restrictions on business users, while ensuring access to relevant commercial data.**
- **Targeted consumer rules. The Digital Fairness Act should address harmful manipulative design and misleading pricing, while protecting transparent, demand-driven dynamic pricing and yield management.**
- **Seamless and competitive payments. EU payment rules should support cross-border tourism, merchant choice and workable payment flows for reservations and no-show charges.**
- **A workable digital euro. If introduced, the digital euro must be usable online and offline by merchants in non-euro Member States, without disproportionate fees, technical burdens or other barriers to acceptance.**
- **Digital capability for SMEs. SMEs should have practical support to adopt AI, digital tools and data-driven services.**

3. DMA: Digital Markets Act (DMA) — Regulation (EU) 2022/1925. It imposes obligations on designated "gatekeepers", including rules against certain parity restrictions, self-preferencing in ranking and the use of non-public business-user data; it also provides specified business users with access to relevant data.
4. DSA: Digital Services Act (DSA) — Regulation (EU) 2022/2065. It regulates intermediary services and online platforms, including transparency of recommender systems (which influence ranking) and trader traceability on online marketplaces.
5. P2B-regulation: Platform-to-Business Regulation (P2B) — Regulation (EU) 2019/1150 on fairness and transparency for business users of online intermediation services. It establishes contractual transparency and redress rights concerning, among other things, ranking, differentiated treatment, restrictions or suspensions, and data-access terms.



4. A feasible circular and climate transition

The Swedish hospitality industry is committed to reducing its environmental impact and contributing to Europe's climate objectives. EU sustainability policy should deliver measurable environmental benefits while preserving competitiveness, innovation and businesses' capacity to invest in the green transition.

Rules must be technology-neutral, proportionate, and practical, allowing businesses to choose the most effective solutions in different operational settings. EU policy should avoid overlapping, contradictory and cumulative obligations that increase administrative burdens without corresponding environmental benefits.

Visita calls for:

- **A technology-neutral and evidence-based approach to sustainability policy that focuses on environmental outcomes, avoids overlapping obligations and enables businesses to invest in the most effective circular and climate solutions.**
- **Proportionate, harmonized and practical implementation, guidance and enforcement of existing sustainability legislation such as the Packaging and Packaging Waste Regulation before new horizontal obligations are added.**
- **A Circular Economy Act that removes barriers to circular solutions, complements existing legislation and strengthens the internal market, rather than creating unworkable new burdens for service-based businesses.**
- **An evidence-based evaluation of the Single-Use Plastics Directive, with meaningful stakeholder involvement and attention to practical outcomes.**



5. Skills, mobility and the Swedish labor-market model

Hospitality is a major employer and an important entry point into the labor market. The sector offers jobs for people at different stages of life and supports integration, mobility and skills development. At the same time, many businesses operate with seasonal demand, irregular hours and narrow margins.

EU labor-market policy should therefore strengthen skills, mobility and enforcement of existing rights while respecting national labor-market models and the autonomy of social partners.

Visita calls for:

- **Full respect for the Swedish model and the autonomy of social partners in matters of wages and working conditions.**
- **Recognition of part-time, fixed-term and seasonal work as legitimate and necessary employment forms in service sectors.**
- **Better conditions for combining irregular working hours with family life, including access to childcare and public services adapted to non-standard working hours.**
- **Practical support for upskilling and reskilling in small businesses, including micro-credentials and digital training.**
- **Labor-mobility rules that facilitate recruitment and cross-border services while protecting workers' rights and national systems.**

Visitas EU Work Programme 2026 – 2027

Priority	File	Visitas focus	New Commission initiative	Implementation, enforcement and ongoing files
1	EU Strategy on Sustainable Tourism	Swedish and Nordic influence; balanced destination policy; data, connectivity and skills.	Anticipated Q3 2026 (Non-legislative)	
1	Tourism statistics	Better Swedish and EU Tourism data, including visitor flows, spending and seasonality.	Anticipated Q2 2027 (legislative)	
1	Affordable Housing Act	Balanced approach between housing affordability, local conditions and sustainable tourism.		Ongoing
1/3	Short-term-rental regulation[6]	Full implementation, data quality and level playing field.		Follow-up and implementation
2	Public Procurement Act	Conditions for contract catering;		Ongoing
3	Digital Fairness Act	Target genuine harmful practices; avoid duplication and protect legitimate pricing models.	Anticipated Q4 2026 (legislative)	

6. Regulation (EU) 2024/1028 of the European Parliament and of the Council of 11 April 2024 on data collection and sharing relating to short-term accommodation rental services and amending Regulation (EU) 2018/1724

Priority	File	Visitas focus	New Commission initiative	Implementation, enforcement and ongoing files
3	Digital Markets Act	OTA conduct, parity clauses, data access, ranking and effective redress		Enforcement and application
3	Payment Services Regulation	Protect Merchant-Initiated Transactions (MITs) from inappropriate refund rights and safeguard hospitality businesses' ability to recover legitimate post-stay charges.		Ongoing
	Digital Euro	Ensure interoperability for non-euro Member States and preserve consumer choice in digital payments.		Ongoing
3	Package Travel Directive	Swedish implementation and practical impacts for operators		Implementation
3	AI Act	Practical guidance, SME support and workable use of AI in hospitality.		Implementation
4	Circular Economy Act	Feasible circularity rules for hospitality and service businesses.	Anticipated Q3 - Q4 2026 (legislative)	
4	PPWR [7]	Proportionate Swedish implementation and legal certainty for businesses.		Implementation
5	Quality Jobs Act	Skills, mobility, enforcement and respect for the Swedish model.	Anticipated Q3 - Q4 2026 (legislative)	

7. Packaging and Packaging Waste Regulation (PPWR) — Regulation (EU) 2025/40 on packaging and packaging waste. It establishes EU-wide requirements across the packaging life cycle, including environmental sustainability, extended producer responsibility, prevention of unnecessary packaging, reuse and refill, and the collection and recycling of packaging waste. The Regulation applies from 12 August 2026.

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