



The EU Host Action Plan

As travel and tourism change and evolve in the wake of the COVID-19 pandemic, the EU has the opportunity to enact bloc-wide rules that more clearly regulate speculator activity while making it easier for everyday people to welcome travelers into their homes. Such rules would allow the EU to address the challenges—from a shrinking supply of affordable housing, to overcrowding and overburdened local services, to noise and nuisance caused by some visitors—that have come along with the continued popularity of tourism in the region.

At Airbnb, we believe that all players in the short-term rental (STR) space have a responsibility to be part of the solution to the challenges created by overtourism. We support the enactment of bloc-wide rules that regulate the activity of speculators in swaths of short-term rental housing, whilst also leveling the playing field to enable non-professional Hosts and small and medium-sized firms to take part alongside other tourism operators and hotels. Our CEO Brian Chesky speaks often of how the COVID-19 pandemic served as a wake-up call for Airbnb to “go back to our roots” in stays hosted by everyday people in the homes in which they live. Globally, nine out of 10 Hosts on Airbnb are individual hosts.¹

As Chesky said in our public market documents, “When we started Airbnb, it was about belonging and connection. The Covid crisis has sharpened our focus to get back to our roots, back to the basics, back to what is truly special about Airbnb – everyday people who host their homes and offer experiences.”

As a company, we have reorganized the business around our community of core Hosts and taken a number of steps over the past 20 months to help these Hosts flourish, from launching AirCover to the Airbnb Host Endowment and our Rural Bootcamp, and we are committed to a policy approach that will do the same for all everyday (“peer”) Hosts across the EU.

Bloc-wide short-term rental rules that support these Hosts will not only make their lives easier through the extra income they can earn, but also will make travel easier for everyday people. Airbnb is a technology platform that helps Europeans take part in, and benefit directly from, travel. The returns that used to accrue to legacy hospitality businesses, many of which are based outside the EU, are now distributed to more EU families and communities, giving them more ownership of the tourism they are making happen. Middle-class families are leveraging their most valuable asset, their home. In the EU, the typical earning of a Host on Airbnb is about €1,800.² Among EU Hosts who have identified their gender, 55 percent are women. More broadly across EMEA, 20 percent of Hosts have declared themselves as either teachers or healthcare workers, or living with one.

¹ As of December 31, 2019

² For the year ended 30 September, 2021.



At the same time, guests on Airbnb— increasingly families and friends reconnecting during the pandemic while business travelers have dropped off—have more choice and flexibility beyond the traditional hotel offering.

Airbnb is committed to an EU-wide regulatory framework for short-term rentals that harmonizes the rules, laws, and regulations to best support effective compliance and enforcement. Airbnb wants to be regulated—we want to be responsible, and through regulation and responsibility, provide certainty for our EU Hosts and guests:

- **Our EU community is predominately everyday (“peer”) Hosts.** The EU is home to 1.34 million Airbnb Hosts—more than any other region in the world—and 1 million of these Hosts rent just one listing. These peer or non-professional Hosts represent a category of accommodation providers who differ fundamentally from both property speculators and hotels.
- **The popularity of Airbnb in Europe continues to grow.** Across all of Europe and since Airbnb began, Hosts on Airbnb have welcomed more guests than any other region in the world, and the profile of guests staying with EU Hosts is more European than at any point in history. European guests are more likely to stay outside of big cities than international or business guests, helping to distribute the economic benefits of travel to more families and communities.
- **Airbnb is helping Europeans benefit from travel in their communities on an unparalleled scale.** While industry-wide tourism activity across the EU fell during the pandemic, the positive impacts of Airbnb travel in the EU grew and the number of EU jobs supported by travel on the platform increased to 5.1 jobs per 1,000 guests in 2020, up from 4.7 per 1,000 guests in 2019, driven by increased guest spending and longer stays on Airbnb.³

We have worked proactively with European governments to make sure short-term rentals work for everyone, with France, Greece and the Netherlands all being recent examples. In many cities, we have introduced or collaborated on registration systems to ensure proper registration of our Hosts so that fair taxes are paid and illegal rentals are delisted.

We know Airbnb has succeeded because we have supported regulation and government partnerships—ranging from collecting and remitting tourist taxes, to sharing data with cities through our bespoke City Portal, to blocking or redirecting reservations from nearly 375,000 people across the UK, France and Spain to help enforce our party ban policy. Through our platform to date, we have collected and remitted more than \$4 billion in taxes on tourism—i.e. offline—activity to governments around the world, including €315 million in the EU.⁴

³According to Oxford Economics - Airbnb: An Economic Engine In The EU27 (released November 2021).

⁴ As of August 2021



We want to build on our work with governments at all levels and collaborate with the EU and Member States on clear and consistent rules that unlock the benefits of hosting equally for everyone across the EU.

Our Vision for Harmonised EU Rules to Support Everyday Hosts

The majority of Hosts on Airbnb are everyday people typically sharing space in one home to boost their income and afford their home.

At the opposite end of the spectrum, property speculators negatively impact local communities and urban centres struggling with complex issues such as housing affordability and over-tourism.

Airbnb wants to work with the EU to find a way forward that supports everyday Hosts while allowing local governments to take action to limit property speculators. Hosts with a handful of listings - for example, the existing Host that has inherited the family home - should be regulated according to a set of fair and proportionate rules that promote responsible home-sharing.

To build on Airbnb's work with governments, and in response to the EU Commission's short-term rental initiative consultation, Airbnb is outlining its vision for how the EU, Member States and Airbnb can work together to support everyday Hosts in the EU, based on five interdependent pillars:

1. Establishing an EU Host register

A new EU-wide Host register would ensure that Hosts have access to fair and proportionate rules and retain their right to provide services as a fundamental freedom of the EU. A common EU system that replaces local registration would streamline registration especially for everyday Hosts who are disproportionately affected by burdensome local rules. Airbnb would support this process by ensuring that eligible Hosts provide a registration number. This would help ensure that only those Hosts with an EU registration number are allowed to publish their listings on a platform.

2. Clarifying local rules and introducing safeguards for everyday Hosts

As we work to create more economic opportunities for everyday Europeans to participate in the travel economy, we must also have a way to address cases where an over-concentration of STR speculator activity can negatively impact residents. This includes an EU policy approach which allows local governments to take action to limit property speculators. Local authorisations should also be permitted moving beyond an EU Host register, to the extent these local rules are reasonable and proportionate and notified to the Commission, whilst safeguarding everyday Hosts from excessive restrictions.



3. Supporting enforcement

As well as removing listings that do not show the necessary EU registration numbers, Airbnb commits to expanding access to the City Portal to support enforcement actions for local authorities and to further support and empower everyday Hosts. Already utilised by more than 100 partners globally, the City Portal is Airbnb's purpose-built tool to support public sector regulation by providing insights on Airbnb's presence in neighborhoods, tools to help enforce laws, and better access to Airbnb when needed.

4. Greater access to data

Airbnb commits to working with EU policymakers to share data on all Host activity at EU-level, and to ensure that local and national authorities have the necessary data to manage effective enforcement. As EU officials continue work on a harmonised approach to income tax collection via DAC7, we see our support of this work as one way that communities can help keep the economics generated by travel on Airbnb for themselves.

5. Supporting local communities

Airbnb will continue to work with governments and authorities across the EU to make Airbnb part of the solution to the challenges they face. This includes expanding our Community Support Lines to tackle noise and nuisance, leveraging our flexible travel tools to guide guest demand to where it is needed most - as both a tool to generate economic development and disperse the concentration of travelers - and working with more governments and tax authorities to simplify and automate the payment of tourist taxes, through which our collaboration has already seen €315 million of tourist tax revenues remitted to EU authorities.⁵

Airbnb supports regulation and we welcome the EU's consultation on a short-term rental initiative as recognition of the vital role that Hosts and home sharing hold in Europe's economy. While we are still in the early stages of our thinking and want to continue moving forward in collaboration with governments at all levels, we would like to share our more detailed thinking on how our proposals will generate benefits for families, communities and authorities across the EU.

Commitments Brought to Life

1. Establishing an EU Host register

Airbnb believes in rules that make it easy for everyday Hosts to list their homes and that establish fair and proportionate rules for all professional Hosts, depending on the underlying activity being regulated.

⁵ As of August 2021



Unfortunately, Hosts in Europe today face a patchwork of rules, many of which introduce requirements that are overly burdensome and difficult to follow, especially for everyday Hosts – families and individuals renting out their own homes and spaces on a non-professional basis. Registration processes vary from being simple and online, to complex, bureaucratic and offline. Some local systems act as de-facto authorisation schemes, by introducing restrictions on a Host's ability to rent their space.

This is why Airbnb calls on the EU to build and administer a common EU registration system to replace local registration systems and to ensure that Hosts across Europe have equal access to fair and proportionate rules. This should be an opt-in system: as and when a local or national authority determines registration is necessary, it should do so according to this common European registration system administered at EU-level. This would help drive greater harmonisation across the region and establish a recognisable and trusted EU wide number for STRs to the benefit of local and national authorities, and to EU consumers. A common EU Host register would also provide the necessary basis for additional regulatory intervention and effective enforcement at local level.

To ensure that this registration system is simple and easy to follow for all Hosts across the EU, we believe it should be built around the following principles:

- **Clear eligibility criteria:** a common EU registration system will necessitate greater clarity and alignment across the bloc regarding who is eligible for the scheme. In particular, clarity is required regarding the following terms:
 - What constitutes a **“short-term rental”** vs **long-term rental**. An EU-wide definition of “short-term rental” is essential in bringing about more clarity for industry stakeholders. This definition would also help differentiate short-term rental activity from longer-term rental activity, given that the latter is not the main focus of the Commission's short-term rental initiative.
 - A distinction between **“professional”** and everyday (i.e. **“peer”**) activity. Within the category of “professional”, **“speculator activity”** should also be distinguished from smaller **“professional”** activity. The aim is to ensure **balanced and proportionate rules** across the board and especially for ordinary families renting out their own homes and spaces. This differentiation should follow the distinction between traders and non-traders established under EU consumer law. The onus should remain on the Hosts themselves to declare their status, though the EU should establish guidance on where this threshold may lie by deferring to national rules around thresholds for business licences or VAT, for example – or by providing specific guidance as to the types of STR hosting activity which may be considered “peer”, where no local thresholds exist. The number of listings held by a Host could be an easy and relevant proxy to indicate peer activity. As an aside, the fact that a property manager may be helping to manage a number of STR properties simultaneously should not change the fact that the underlying accommodation services are being hosted by a peer (or otherwise).



- **Proportionate:** building off the above, the rules underlying the registration scheme must be proportionate to the nature of the activity being regulated - with the lightest obligations for “peers” (for example an obligation to provide a contact number and self-declare compliance with relevant local rules) and, depending on the policy goals defined at EU and local level, potentially additional layers of regulation for professional operators, whilst ensuring the latter are still able to offer their services freely across the EU. Local authorities should be able to take action against property speculators. Non-STR, traditional hospitality offered via an STR platform should continue to be subject to separate rules, as is the case today.
- **Online one-stop-shop:** eligible Hosts should be able to complete their registration in a single visit to a user-friendly website, in their native EU language. Hosts should receive their registration number automatically and in real time on this website after completing the registration. This EU registration number should substitute existing registration numbers at national or local level in the mid-term, to ensure that a Host is not encumbered with several overlapping registration obligations. However, we understand that a transition from local or national registration to European-level registration would have to be carefully managed in the short-term, for those authorities who opt-in to registration.
- **Instantaneous and one-time-only:** Hosts should not need to repeat, renew or confirm their registration once complete, except in the case of material changes of circumstance.
- **Affordable for Hosts:** non-professional Hosts should be able to register cost-free. The EU could consider reasonable nominal fees for other Hosts, to the extent these are proportionate to the activity in hand and aligned with EU and national policy objectives.
- **Data minimisation:** consistent with data protection best practices, Hosts should only be required to provide the minimum data necessary to process a registration, including (i) full name, (ii) ID/Passport no, (iii) full listing address, (iv) previous registration number (if applicable). The Host will hold ultimate responsibility for reporting this data in a timely and reliable manner. There should be no requirement on the Host to give information that is unrelated to the purpose of identifying a Host and the address of their proposed listing.
- **Notification to the European Commission:** local or national authorities should notify the Commission of their intent to roll out registration and opt-in to the EU Host register. This notification should include some basic justification as to why Host registration is necessary to better understand and track STR activity at local or national level.
- **Regionally consistent:** where a local or national authority decides to implement registration, the EU register should supersede any existing national or subnational registration schemes and make the Host compliant with all laws, meaning there cannot be cases in which a Host has several registration obligations at various governmental levels. The EU system should incorporate a self-declaration by the Host, to confirm understanding of - and adherence to - any applicable local rules affecting STR in their region (e.g. laws regarding the use of social housing for STR activity), to the extent those



rules are in accordance with EU legal frameworks. Local and national authorities should ensure that all necessary information regarding these local legal requirements are made accessible to Hosts via the EU register and national authority websites.

- **Reasonable implementation period:** there should be a sufficiently long grace period for both Hosts and platforms to allow existing Hosts to register once an EU system is introduced, and before enforcement begins against non-compliant listings. The EU should partner with industry, Member States and local governments to communicate jointly about the process for registration. We also recognise that some local authorities and Member States will require a grace period to shift from existing regulatory regimes to a common EU register.
- **Consistent application and level playing field:** obligations should apply to Hosts whether they are listing the same accommodation online or offline, and all online platforms must be treated consistently, regardless of their exact business models.

2. Clarifying local rules and introducing safeguards for everyday Hosts

Whilst a common EU registration system would do much to harmonise rules for STR Hosts across the bloc, Airbnb also acknowledges that local authorities may occasionally need to move beyond a simple EU registration scheme and **into the domain of authorisation schemes** (e.g. permits) to achieve specific policy goals as set out in the EU Services Directive, and in situations where the over-concentration of property speculators can negatively impact residents. Local authorisation schemes could be integrated into the EU-level system so that Hosts access one EU register portal, but with varying degrees of friction within the portal depending on additional local requirements in place.

Crucially, these local authorisation schemes **should never be applied to peer activity**, to the extent that such activity is by definition occasional and smaller scale, based around individuals renting out their primary or secondary residences.

Wherever a local authority looks to restrict professional STR activity beyond an EU Host register, guardrails should be defined to ensure these authorisations are also proportionate and justified depending on the nature of the professional activity being regulated, and with the toughest restrictions for property speculators. The onus should be on local authorities to enforce these authorisation schemes.

These authorisation schemes should always follow a phased approach; that is, authorities should not directly introduce authorisation processes before having first introduced registration via an EU-wide system, and proven that this is insufficient to meet their policy goals. Authorities should establish ex-ante objective thresholds for additional local restrictions, and demonstrate to the European Commission that these quantitative thresholds have been met and that there is an associated public policy need, before it moves to restrict STR activity.

Any local authorisation schemes should be limited geographically to the districts of a city where there is a proven challenge and limited in time with a clear date for review, to ensure that excessive restrictions on hosting do not become the norm.



Any local authorisation scheme should be notified to the European Commission ahead of time, to ensure that the Commission can retain an overview of local policy measures and confirm that local derogations to an EU registration system are proportionate and consistent.

Finally, outright or de-facto bans on STR activity can never constitute a proportionate policy response by their very nature, and should thus never be an acceptable policy response at local or national level.

3. Supporting enforcement

Airbnb strives to be a responsible platform. Fairer, more consistent, and more harmonised rules for STR Hosts Europe-wide will provide greater possibilities for STR platforms to support local authorities in their oversight and enforcement responsibilities, and to support everyday Hosts with their compliance obligations to ensure responsible home-sharing across the bloc. A major part of the challenge with today's hyper-fragmented system is that no STR intermediary - be they online or offline - can effectively support compliance with hundreds of varying local rules which serve to undermine the Single Market and which often contravene EU legal frameworks, such as the EU Services and e-Commerce Directives.

With the existence of one single Host register, Airbnb can more effectively help support Host compliance by ensuring that eligible Hosts display a registration number according to a pre-agreed registration format. This would help ensure that only those Hosts with an EU registration number are allowed to publish their listings on a platform. There should be no obligation on the platform to pre-verify a Host registration number - it should remain the responsibility of the local authority to conduct the necessary checks and related enforcement processes, based on the data they receive via an EU STR database which we explore below.

Platforms can be expected to facilitate Notice and Action (N&A) processes for local authorities in accordance with the e-Commerce Directive and future DSA. Airbnb is the only STR platform to have developed a dedicated tool to help local authorities with N&A compliance around registration requirements, where such requirements are aligned with EU frameworks. The [City Portal](#) is currently being used by several cities in France, as well as Amsterdam City Hall, to help streamline N&A processes. A harmonised EU framework would allow Airbnb to scale this offering across the region and allow local authorities to implement effective control over the STR listings in their jurisdiction.

The DSA also presents a useful opportunity to clarify how local and national authorities and other stakeholders can flag illegal content and request information to a platform that is legally established in another Member State. Airbnb would welcome discussions on an STR-specific Code of Conduct to establish dedicated N&A mechanisms for specific policy challenges as defined at local level, for example vulnerable districts suffering from housing availability or affordability issues.



4. Greater access to data

Airbnb understands that authorities require data on Host activity in order to effectively enforce against potentially non-compliant STR Hosts. However, despite the myriad of ways in which Airbnb is already regularly sharing data with national authorities, including in France, Spain, Denmark, Estonia, Ireland and Greece, local data requests continue to pose numerous legal and privacy challenges for platforms as they are often fragmented, inconsistent and run contrary to EU legal frameworks. Furthermore, many local authorities lack the necessary resources and expertise to effectively manage platform data-sharing and related enforcement on a regular basis.

To turn this situation around, Airbnb supports the idea of an EU database for STR activity, managed by a central authority and to sit alongside - but separate to - a common EU registration system. A central EU database would allow platforms to report data on Hosts with a listing in the EU, and on associated hosting-activity per listing (nights rented out), in an efficient and secure manner. Airbnb could support this data sharing in numerous ways; by leveraging the secure file transfer capabilities of the Airbnb City Portal, or via an API solution at the EU-level. Streamlined and harmonised data sharing processes can significantly reduce the compliance burden for both platforms and Hosts, improve data quality to the extent that the data points to be reported are standardised across the region, and create a “one-stop-shop” for Host data reporting akin to the approach codified in the DAC7 Directive. Crucially, national and local authorities would be able to obtain relevant data regarding STR activity in their jurisdictions from an EU-level data-base in a streamlined and straightforward way, without extensive technical expertise or resources

Any data reporting conducted via the EU database should be guided by an EU legal framework for STR Host data sharing. This framework should ensure that GDPR principles such as data minimisation and necessity are respected, that data is shared according to a pre-agreed schedule (e.g. quarterly - to ensure data is sufficiently recent to make it relevant to local authorities, whilst limiting the compliance burden on platforms), and that the data points to be reported align as far as possible with existing data collection requirements -- such as exist under DAC 7. As with the rollout of a single EU Host registration system, there should be sufficient lag time granted to platforms to collect data from existing Hosts before data sharing begins. This approach should align with existing work on an EU Data Strategy whilst recognising some of the particularities around Host data sharing in an STR context, for example the sharing and transfer of personal data.

5. Supporting local communities

Airbnb will continue to work with governments and authorities across the EU to make Airbnb part of the solution to the challenges they face.

Airbnb will continue to expand the Community Support Line to tackle noise and nuisance, which provides communities with a direct line of communication to Airbnb to report concerns about listings or guest behavior. Airbnb is committed to the tools and policies



necessary to help ensure the safety of guests and protect communities from negative impacts of tourism on their quality of life. The Neighborhood Support Line is already live in 27 countries and territories globally, including France, Spain, Italy, Ireland, Hungary, the UK, Czech Republic and Netherlands, and we will continue to expand this important tool across the EU.

Airbnb will also continue to leverage our flexible travel tools to guide guest demand to where it is needed most - as both a tool to generate economic development and disperse the concentration of travelers - and in the way that destination marketing organisations across the EU see fit. People are increasingly discovering new places to travel, and I'm Flexible also supports guests who are flexible on where they go. Instead of guests traveling to the same historically popular urban destinations, we've seen consistent demand growth globally in both nearby and rural destinations. Over 40% of gross nights booked in Q3 2021 were within 300 miles of home, up from 32% in Q3 2019, while gross nights booked to rural destinations increased more than 40% in Q3 2021 from Q3 2019. Meanwhile, we've seen urban travel gradually returning, but fanning out beyond iconic cities. In Q3 2021, our top 10 cities worldwide represented 6% of gross revenue, down from 11% in Q3 2019. During the pandemic, more than 100,000 cities have had at least one Airbnb booking, including more than 6,000 cities and towns receiving their first booking ever.

I'm Flexible allows us to point guest demand to where and when we have ample Host supply—increasing demand for our existing Host community, without the need to always add listings. To support this work, Airbnb has signed more than 100 partnerships and collaborations with destination marketing organizations to support the redistribution of travel, including in Germany, Austria, Spain, Italy, Denmark, and in France where we are working with the Association of Rural Mayors, and we will continue this important work.

Airbnb will also work with more governments and tax authorities to simplify and automate the payment of tourist taxes, through which our collaboration has already seen €315 million of tourist tax revenues remitted to EU authorities. Travel on Airbnb can often be subject to tourist tax and collaborations with authorities across the EU make the process simple for everyone by automating the collecting and remitting of tourist taxes from guests on behalf of Hosts. Airbnb first began collecting and remitting tourist taxes in the EU in Amsterdam in 2014 and now has agreements with cities and regions in seven out of 18 EU Member States where tourist tax is applied, including Amsterdam, Florence, Lisbon and Milan, and generalised collection in France that covers more than 29,000 cities.

We look forward to participating in the upcoming discussions on future rules for STRs in Europe and stand ready to work with EU policy makers to ensure the sustainable development of short-term rental activity in the coming months and years.

Airbnb

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