



Sr. Rafael Pérez Ruiz
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Ministerio del Interior
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H.E. Ms. Rosario Sánchez Grau
State Secretary for Tourism of the
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Sra. Mar España Martí
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Cc:
European Commission, DG JUST
Unit C3

European Data Protection
Supervisor

Brussel, October 29th, 2024

Dear Mr. Pérez Ruiz,

Dear Ms. Sánchez Grau,

Dear Ms. España Martí,

As a coalition of European associations representing the travel and tourism industry, we are writing to you as a follow-up to our previous letter of 17 September 2024, to which we have not yet received a reply.

We have since been informed that the application of Royal Decree 933/2021 has been postponed until 2 December. We have also received reports that during a meeting with the Spanish tourism industry on 4 October, it was stated that no additional data would be required beyond what is already being collected.

There are also rumours that the Decree may not apply companies that are not established in Spain. These developments, so far only verbal, would have a significant impact on the European tourism industry and we are urgently seeking written clarification.

While we welcome the decision to postpone the application of the Royal Decree, we believe there is an urgent need for written clarification from the authorities on which industry may rely, providing specific legal guidance and technical details. The travel industry needs legal certainty and operational specifications to ensure compliance.

It is therefore a matter of increasing concern that we have yet to receive a response to the concerns raised in our previous communication.

We urge the Spanish government to ensure full compliance with European data protection legislation, in particular the Law Enforcement Directive and the General Data Protection Regulation (GDPR).

In addition, the Royal Decree places an impractical burden on businesses, and many are not able to comply due to the complexity and volume of data required. The process needs to be simplified, or at least delayed until significant and practical changes are made. Specifically, public authorities should set a harmonised and digital procedure for automatic and streamlined collection of tourism data.

We respectfully reiterate our previous view that the Decree will not achieve the intended objectives related to security. We remain committed to working with the authorities and look forward to a timely response that addresses the privacy, legal, and operational concerns of the tourism industry.

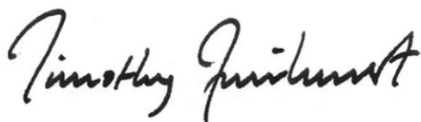
Yours sincerely,



Eric Drésin
Secretary General, ECTAA



Ros Pritchard
Secretary General, EFCO&HPA



Tim Fairhurst
Director General, ETOA



Marie Audren
Director General, HOTREC



Klaus Ehrlich
General Secretary, RuralTour