



**EUROPEAN UNION FEDERATION  
OF YOUTH HOSTEL ASSOCIATIONS**

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**EUFED contribution to the consultation on geo-blocking and other geographically-based restrictions**

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As a united voice of youth hostel associations in Europe, European Union Federation of Youth Hostel Associations (EUFED) welcomes the opportunity to contribute to the European Commission's consultation on geo-blocking and other geographically-based restrictions. EUFED represents 14.3 million overnights in youth hostels a year which is equal to 44% of a worldwide market share.

EUFED has chosen to contribute to the survey by providing its own paper rather than by responding to the questionnaire.

EUFED highlights that the European hospitality industry is made of 1.8 million businesses, 99.5% of which being SMEs and 91% being micro enterprises (i.e. employing less than 10 people). SMEs simply do not necessarily have the skills and resources needed to provide customer service in different languages and adapting to different rules of each country.

EUFED is in favour of the general principle of free movement of goods and services in the EU, however, certain measures should be facilitated in order to support and encourage SMEs to provide their services cross-border. Taking into account financial constraints and risks, limited human and time resources, EUFED is in favour of ensuring that traders are free to choose who they want to deal with.

Moreover, pricing across markets can be different for a number of reasons (i.e. currency differences, taxes, supply and demand for particular destinations at different times of the year) and that is why EUFED is convinced that traders should be free to choose the price.

In addition, EUFED would very much welcome if the Commission could clearly define and explain specific cases when geo-blocking is considered unjustified.

We remain at your disposal, should you require any clarification or information on the issues raised in this document.

Yours sincerely,  
Viktorija Ramauskaite

EUFED Operating Director