

Ms Teresa Ribera

Executive Vice-President for a Clean, Just and Competitive Transition

Mr Dan Jørgensen

Commissioner for Energy and Housing

European Commission
Rue de la Loi / Wetstraat 200
1049 Brussels

2 September 2026

Re: Ensuring proportionality and better lawmaking in short-term rental measures under the Affordable Housing Act

Dear Executive Vice-President Ribera, dear Commissioner Jørgensen,

We write to you on behalf of the Computer & Communications Industry Association (CCIA Europe) as the Commission finalises the Affordable Housing Act, which may include new rules on short-term rental services. We represent online platforms and digital services, including intermediaries of short-term accommodation rental services. Our members are directly affected by how this Act is designed, and we write from that position.

CCIA Europe strongly believes that if the Union is going to further legislate on short-term rentals, it should do so in a targeted and evidence-based, data-driven way.

A half-measure not grounded in accurate and granular data and without enforceable proportionality checks would serve no one well: not the homeowners who let a room to help make ends meet, not the regions and industries that live from tourism, and, in time, not the local authorities the Act is meant to equip either.

There is a reason for caution, which is one of sequence. The Union already has an instrument on short-term rentals: Regulation (EU) 2024/1028, which entered into application on 20 May 2026 and was designed precisely to give public authorities the data on which to base proportionate measures.¹ That data is only beginning to be collected now. To legislate further before such data exists inverts the logic of the Commission's own framework, and asks local authorities to act first and establish only afterwards whether the action was warranted.

¹ [Regulation \(EU\) 2024/1028](#) of 11 April 2024 on data collection and sharing relating to short-term accommodation rental services, OJ L, 2024/1028

Sequencing aside, the Commission's own Joint Research Centre places short-term rentals at only 1.2 percent of the Union's housing stock,² against vacancy rates approaching 20 percent across the EU.³

For the great majority of cities, the claim that short-term rentals are driving housing stress does not survive contact with this evidence. Where cities have restricted them regardless, Lisbon and Edinburgh among them, both rent paid by local residents and hotel prices actually rose rather than fell, finding no evidence of benefit.⁴ Lisbon has since overturned the freeze on new registrations, on the express ground that they had failed to bring housing costs down.⁵ Amsterdam points the same way from another direction: some of the strictest short-term rental rules in Europe have not eased visitor pressure, and visitor numbers have continued to climb.⁶ Crucially, in none of those cases was the measure tested against the purpose for which it was adopted.

An Act built on a premise this weak will not achieve its aim by handing local authorities a freer hand. It will achieve its aim only by setting the conditions on when, where, and how that hand is used.

This is not a matter of housing policy alone. Short-term rental platforms provide a service that moves across borders and sustains tourism economies throughout the Union; measures that constrain them touch the free movement of services on which the Single Market rests. The Draghi report on European Competitiveness cited IMF estimates that the Union's own internal barriers already weigh on trade in services as though a tariff of 110 percent were being applied.⁷ An Act that permits disproportionate local measures to multiply unchecked would add to that burden, at the very moment the Union wants to reduce it.

Setting conditions for local restrictions on short-term rentals, in practice, means requiring a demonstrated link between a genuine local problem and the response chosen, rather than permitting authorities to act on assumption. That is not a novel demand: the obligation to justify and substantiate restrictions on the freedom to provide services is already established in Union law and the Court's case-law on short-term rental authorisation schemes, in *Calí Apartments*⁸ and, most recently, in the Advocate General's Opinion in *Smartflats*.⁹

² JRC, Housing investment needs in the EU, December 2025 ([JRC144703](#))

³ European Affordable Housing Plan, [COM\(2025\) 1025](#), 16 December 2025.

⁴ *Edinburgh short-term let control area has 'delivered no measurable housing benefit', FOI reveals*, [Scottish Housing News](#), 9 February 2026. For Lisbon, [Estatísticas de Rendias da Habitação ao nível local](#), 26 June 2026, and [Estatísticas do Turismo](#), Instituto Nacional de Estatística, 2026.

⁵ Assembleia Municipal de Lisboa, Deliberação n.º 570/AML/2025 of 2 December 2025, amending the Regulamento Municipal do Alojamento Local, published as [Aviso n.º 29926-A/2025/2](#), *Diário da República*, 2.ª série, 5 December 2025.

⁶ See [Harnessing the Short-Term Rental Advantage in Europe](#), Tourism Economics, December 2024, p. 30

⁷ [The future of European competitiveness](#), Part A, Mario Draghi, September 2024.

⁸ Joined Cases C-724/18 and C-727/18, Judgment of 22 September 2020, ECLI:EU:C:2020:743

⁹ Case C-813/24, Opinion of AG Campos Sánchez-Bordona, 5 February 2026, *Smartflats SA v Région de Bruxelles-Capitale*

What this Act can usefully do is give that proportionality obligation concrete form. It means building in a way to verify, once a measure is adopted, that it continues to serve the purpose it was designed for, rather than persisting indefinitely by default. And it means distinguishing, as a matter of basic fairness, between commercial operators and the homeowner letting a second residence over the summer. Absent this, the Act risks becoming an instrument through which every local anxiety about tourism extends beyond the situations the evidence supports.

For all those reasons, we respectfully call on your leadership to ensure that any additional rules on short-term rentals in the Affordable Housing Act provide:

- a requirement that any local restriction demonstrate a causal link to an identified local problem;
- a distinction between commercial operators and occasional hosts, and between primary residences and second homes;
- an obligation to review measures periodically against the purpose for which they were adopted;
- and an explicit role for the Commission in monitoring national and local restrictions, issuing opinions where they appear disproportionate and, where they are not remedied, pursuing them through the ordinary compliance channels.

We remain entirely at your disposal to discuss these considerations in person, should you consider it useful.

Yours sincerely,



Daniel Friedlaender
Senior Vice President, Head of Office
Computer and Communications Industry Association (CCIA Europe)

cc:

- **Mr Valdis Dombrovskis**, Commissioner for the Economy and Productivity; Implementation and Simplification
- **Mr Stéphane Séjourné**, Executive Vice-President for Prosperity and Industrial Strategy
- **Mr Raffaele Fitto**, Executive Vice-President for Cohesion and Reforms
- **Mr Apostolos Tzitzikostas**, Commissioner for Sustainable Transport and Tourism