

Inspiretec Response to CMA Consultation on Price Transparency Guidance

(Digital Markets, Competition and Consumers Act 2024)

This document provides Inspiretec's formal response to the CMA's consultation on price transparency guidance, structured against the consultation questions Q1–Q7.

Q1. Do you have any comments on the structure or clarity of the Draft Guidance?

We find the Draft Guidance clear in its intent and structured logically, covering invitations to purchase, mandatory charges, and the presentation of total price. However, we believe additional clarity is needed around how multi-tier supply chains in the travel industry should handle responsibilities for data accuracy. As drafted, the guidance risks placing unrealistic expectations on intermediaries and software providers who cannot validate charges set and levied by end suppliers.

Q2. Do you have any comments about what an invitation to purchase is (Chapter 2)?

The definition of an invitation to purchase is broad and will capture a wide range of advertising and sales touchpoints within travel. We note that this means early-stage advertising will be in scope, but often charges are not known or are only available once consumer requirements are specified. We recommend clearer recognition of this reality for complex products such as travel.

Q3. Do you have any comments about what needs to be included in an invitation to purchase (Chapter 3)?

While the intent to prevent misleading pricing is welcome, the requirement to include all mandatory charges in the initial headline price will be impractical for the travel industry. Charges such as local taxes, resort fees, cleaning fees, and car hire surcharges are not consistently passed through in supplier feeds. Often, responsibility sits with the local hotel or service provider, not intermediaries. Without a safe harbour, intermediaries will be forced to either guess or risk non-compliance. This could lead to confusion for consumers rather than clarity.

Q4. Do you have any comments about the core principles for what the ‘total price’ must include (Chapter 4)?

The principle that the total price should include all mandatory charges is sound in theory, but it is not workable in travel due to supply chain fragmentation. Charges are often:

- Set by end suppliers (e.g. hotels, car hire depots);
- Presented in local currencies, subject to multiple conversions and exchange rate fluctuations;
- Not available in machine-readable formats through upstream XML/API feeds.

This makes it impossible to present a definitive total price at the outset. Forcing inclusion of such charges risks producing headline prices that still diverge from reality, creating consumer mistrust. We strongly recommend a proportionality test and explicit allowance for estimated or example-based disclosure where accurate data is unavailable.

Q5. Do you have any comments about the guidance on specific types of charges and pricing (Chapter 5)?

Yes. Our sector faces multiple ‘hidden’ or non-transparent charges that are outside of intermediaries’ control. We attach below examples across different travel components to illustrate the challenge:

Component	Type of Charge	Why Problematic Under Proposed Rule
Accommodation	Resort/facility fees (per person/night)	Often only payable locally, not passed through in upstream feeds; varies by property and destination.
Accommodation	Local tourist taxes	Set by municipalities, in local currencies; subject to currency fluctuation and multiple levels of conversion.
Accommodation	Mandatory cleaning fees (e.g. villas)	Common in self-catering; not always disclosed at time of booking.
Accommodation	Energy surcharges	Compulsory per-night charges (heating/cooling), difficult to standardise in

		feeds.
Car Hire	Mandatory insurance (e.g. CDW)	Sometimes excluded from headline rental rates; varies by jurisdiction.
Car Hire	Pick-up/drop-off fees	Added locally; not consistently distributed in booking APIs.
Car Hire	Fuel service charges	Applied under 'full-to-empty' policies; mandatory if policy chosen.
Car Hire	Age-related driver fees	Automatically applied based on driver age, not always calculable at advertising stage.
Flights	Airport or departure taxes	In some destinations payable locally at airport; not in airline's upfront fare data.
Flights	Passenger/security charges	Levied by airports/governments, sometimes separate from ticket.
Flights	Seat assignment fees	Increasingly unavoidable for families/groups, but not standardised in fare displays.
Flights	Baggage handling fees	Treated as 'ancillaries' but can be essential for most travellers.
Cruises & Packages	Port fees / surcharges	Mandatory but often excluded from base price; added later in booking process.
Cruises & Packages	Transfer surcharges	Applied on a per passenger basis; not always in upstream inventory feeds.

Cruises & Packages

Visa service fees

Sometimes unavoidable in packages; not always included in upfront price.

As these examples show, mandating inclusion of all charges without flexibility will create a significant compliance burden with only limited consumer benefit. We recommend sector-specific guidance or safe harbour provisions.

Q6. Do you have any comments on the illustrative examples provided in the Draft Guidance?

The examples in the Draft Guidance are helpful but overly retail-focused. We suggest adding examples that reflect international, multi-supplier products such as:

- A hotel in Spain applying a tourist tax in Euros, payable locally.
- A US car hire firm applying a young driver surcharge only at the branch.
- A cruise line where port fees are not disclosed until final payment.

These would give the travel industry greater clarity on how the CMA expects compliance in contexts where charges are set outside the UK and in foreign currencies.

Q7. Do you have any other comments on topics not covered by the specific questions above?

We believe the Draft Guidance should explicitly consider whether package travel should be treated differently or excluded from scope. Packages bring together multiple components, each of which may carry separate local charges. Without recognition of this complexity, the rules risk being unworkable and creating confusion rather than transparency.

Finally, we urge the CMA to work collaboratively with trade bodies, suppliers, and technology providers to develop common data standards so that mandatory charges can be reliably passed through the chain. Without this, implementation will result in high costs, inconsistent outcomes, and potential legal exposure for UK intermediaries.

Conclusion

Inspiretec shares the CMA's ambition to improve consumer trust through transparent pricing. However, the Draft Guidance as currently framed risks creating unintended technical and financial burdens across the travel technology supply chain. These costs will cascade through to consumers, raising rather than lowering the prices they pay.

We recommend a flexible and proportionate approach, recognising the unique realities of the travel industry's multi-tier distribution model, inconsistent supplier data standards, and currency volatility, whilst still upholding the principle of price transparency.