



How to cite this paper: Aghajanyan S., Hayrapetyan A., Gharagyozyan M., Nersisyan S. (2025). Harmonizing Tourism Regulations in Armenia: Lessons from the EU. *Messenger of ASUE*, 3(81), 115-130.
DOI: 10.52174/1829-0280_2025.3-115
Received: 12.08.2025. **Revision:** 07.11.2025. **Accepted:** 29.12.2025.

SUSANNA AGHAJANYAN

*Senior Lecturer of the Chair of International Economic Relations
at the Armenian State University of Economics,
PhD in Economics*

 <https://orcid.org/0000-0002-5469-3995>

ALBERT HAYRAPETYAN

*Senior Lecturer at the Chair of International Economic Relations
at the Armenian State University of Economics,
PhD in Economics*

 <https://orcid.org/0000-0003-1029-3620>

MELANYA GHARAGYOZYAN

*Lecturer at the Chair of Applied Economics at the
Armenian State University of Economics*

 <https://orcid.org/0000-0002-3087-699X>

SONA NERSISYAN

*Student of the Management Department of the
Gyumri Branch of the Armenian State University of Economics*

 <https://orcid.org/0009-0002-4771-2657>

HARMONIZING TOURISM REGULATIONS IN ARMENIA: LESSONS FROM THE EU

This paper presents an in-depth analysis of the legal framework that regulates the Republic of Armenia's tourism industry. The study uses a comparative legal approach to analyze current normative acts, pinpoint important legal provisions, and evaluate how well they are applied in the Armenian context. The European Union's and Armenia's legislations are compared with particular care in order to find any discrepancies, areas for harmonization, and best practices. In addition to highlighting the advantages and disadvantages of Armenia's tourism regulations, the findings provide suggestions for improving regulatory efficacy, encouraging the growth of sustainable tourism, and permitting closer conformity with international norms. This study supports sector-specific

improvement through policy-making processes and advances our understanding of tourist governance in transitional economies.

A comparison of the European Union and the Republic of Armenia's regulatory frameworks in the tourism sector—including Directive (EU) 2015/2302 on package travel and linked travel arrangements, the Decision No. 76-N of the Government of the Republic of Armenia dated January 23, 2025, and the Law of the Republic of Armenia “On Tourism”—reveals significant differences in their legal nature, territorial application, objectives, and impact on competitive relations. These differences are particularly evident from the perspective of antitrust and competition policy, including the structure of legal acts, regulatory mechanisms, and the role of consumer protection in maintaining a competitive balance in the tourism market.

Keywords: *tourism, competition, consumer protection, travel regulation*

JEL: F15, K23, L83

DOI: 10.52174/1829-0280_2025.3-115

INTRODUCTION. Tourism serves as a key economic driver at both the regional and global levels, playing a significant role in economic growth, employment, and social progress. Today, consumers combine various travel services (transport, accommodation, car rental, leisure activities) in different ways for the same trip or vacation. They purchase either “pre-arranged” packages—online or offline—or “customize” their own packages. For this purpose, they may use the services of a travel agency or directly book multiple services (transport, car rental, hotel, excursions) from one or several service providers.

Consumers interact with tourism businesses through various travel services and engagement models, either directly or through intermediaries, reflecting the diverse and evolving nature of consumer behavior in the tourism sector. In this highly competitive and price-sensitive environment, tourism services need to remain competitive.

Armenia has recently initiated a process of harmonizing its tourism sector legislation with that of the European Union, accompanied by reforms in the national legal framework. This study aims to explore the extent to which these legislative reforms create a balance between making the business environment attractive and ensuring fair competition and consumer protection.

In order to enhance sectoral competitiveness, recent assessments by international organizations support bringing national tourism regulations into line with international best practices. In this process, the function of enforcement mechanisms, judicial interpretation, and normative acts is essential. Research on the comprehensive comparison of Armenian and EU laws is, nevertheless, lacking, especially when it comes to consumer protection and tourism regulations. This research helps close this gap by comparing Armenian tourism laws with EU frameworks via a comparative legal analysis.

LITERATURE REVIEW. The governance of tourism has gradually emerged as and remains a topic of academic interest, especially from the point of view of market deregulation, digitization of travel sector services, and increasing focus on consumer protection in competitive markets. The nature of tourism markets is defined by complicated service chains, asymmetry of information between service providers and consumers, and transnational contracts, thereby requiring consistent and appropriate regulatory frameworks (Hall, 2014; Dredge & Jenkins, 2011). Thus, the governance of tourism is usually analyzed at the interface of public policies, consumer policies, and competition policies. In the European Union, tourism regulatory matters have received considerable attention in the general process of the development of the internal market. A large body of literature highlights the importance of EU directives for achieving a high level of consumer protection and balanced competition among market players (Weatherill, 2016; Micklitz & Reich, 2017). In particular, it is pointed out that the Package Travel and Linked Travel Arrangements Directive (EU) 2015/2302 represents the turning point in the process of adjusting legal regulations to the new models of bookings through digital platforms and the creation of customized trips, and that the Directive covers the linked travel arrangements, thus overcoming regulatory shortcomings and preventing the avoidance of liability (Riefa & Weatherill, 2019). There are some studies that draw attention to the fact that the regulation of tourism in the EU should be assessed not only through the prism of consumer protection, but also as an element within competition policy. The fulfillment of the requirements of transparency, the use of standardized pre-contractual information, as well as the clarification of liability, are seen as measures that eliminate distortions which occur because of commercial practices, which mislead, as well as because of informational advantages (Cafaggi & Micklitz, 2009; Akman, 2021).

Considerable attention in the literature is given to insolvency protection and financial guarantees in tourism markets. Studies indicate that mandatory guarantees and harmonized liability systems play a two-way role: they protect travelers against financial loss, while at the same time, such a system acts as a sort of filtering entry mechanism into the market, which deters poorly capitalized or badly organized operators from entry into the market (European Commission 2019; OECD 2018). In the tourism industry, these systems are very significant, where in most cases advance payments need to be made well in advance, and where the consequences of supplier insolvency can be quite dramatic for consumers.

However, compared to the above-mentioned areas, the literature concerning the regulation of tourism in the transition economies and Armenia in the area of tourism regulation is quite limited. There are some publications regarding the tourism sector of Armenia, mainly concentrating upon its economic, sustainable, and regional development and the capacity of the institutions (UNWTO, 2020; World Bank, 2021). There is also a dominant description of the regulation from

the legal aspect, mainly presenting the developments within the domestic legislative systems and their conformity with the global and EU regulatory frameworks concerning the regulation of the respective sector. However, this research paper aims to bridge the research gap by doing a structured comparative legal analysis, comparing the tourism regulatory regime in the European Union and the Republic of Armenia. Contrary to the previous research approach, in this paper, the objective does not stop at legal transposition but also includes the functional significance of the role of consumer protection tools in establishing the competitive relationship in the tourism market. Therefore, the paper, by positioning the tourism legislation in the Republic of Armenia in the wider EU discourse, could contribute to the academic literature on tourism regulation in transition economies.

METHODOLOGY. The methodological basis of this study is the comparative legal analysis approach, which aims to examine and assess the legal regulations related to the tourism sector by comparing the relevant normative acts of the European Union and the Republic of Armenia. The following methodological approaches have primarily been applied:

Analysis of legal and regulatory frameworks aimed at identifying the structural elements of legal regulations, defining key terms, outlining legal consequences, and determining the distribution of obligations. Key legislative acts related to the sector have been studied:

- In the case of the EU: Directive (EU) 2015/2302 on package travel, as well as guidelines and clarifications issued by the European Commission and the Court of Justice of the European Union.
- In the case of Armenia: the Law «On Tourism», the Law «On Protection of Consumer Rights», and relevant provisions of the Civil Code.

The comparative analysis is conducted to identify the strengths and weaknesses of the regulatory frameworks, with the aim of proposing potential improvements.

A comparison of legal provisions has been carried out based on the following criteria: comparison of definitions and legal concepts, structural matching of obligations and rights, comparison of insurance protection and liability mechanisms, and analysis through the comparison of cancellation and refund regulations.

Such an approach can produce a number of results, particularly in a comparative legal analysis of the regulation of the tourism sector:

- Identification of gaps and discrepancies - indicating where Armenian legislation differs from EU norms or lacks certain provisions.
- Outlining EU procedures (case law, enforcement models, and institutional structures) that Armenia could use is known as "best practice mapping."

- Clarification of legal concepts: lowering interpretative ambiguity and guaranteeing a consistent understanding of important terminology.
- Evaluating the practical, not only theoretical, efficiency of rules is known as enforcement effectiveness assessment.
- Suggestions for harmonization: putting forward certain changes or policy modifications to bring Armenian laws into line with contemporary global standards.

Furthermore, the study also uses the doctrinal legal analysis approach, which encompasses the interpretation of the legal norms in the concerned legal systems. This approach is adopted in the assessment of the legal character, intent, and logical consistency of the concerned legal provisions in the rising sector of tourism in relation to the general tenets of consumer protection and competition law. Doctrinal analysis helps in the in-depth comprehension of the legal provisions in relation to the concerned legal texts.

In particular, the research also analyzes the subject by taking a functional regulatory approach whereby the research investigates the effects of legal provisions on legal acts, especially in the areas of consumer protection and competition equilibrium. Such an approach takes an in-depth look at the regulatory effects of legal provisions on issues such as insolvency protection, unitary liability, or transparency.

Considering that this investigation focuses on regulatory and doctrinal issues of tourism, it did not utilize any strategic analysis technique like SWOT or PEST analysis, which may be relevant within management literature on this topic, but not otherwise pertinent due to its nature of analysis that is not geared towards legal or regulatory analysis in this context. The current set of tools will enable an academically rigorous analysis of this topic of tourism regulation as it relates to economic governance.

Contextual Indicators of the Tourism Sector

Despite the general qualitative approach of this study, some statistical context about the tourism sector seems necessary for the purpose of contextually framing the legal analysis within the context of tourism policies. Statistics from international organizations indicate that tourism is a considerable element of the economy, as tourism can be a contributor to employment, mobility, and the export of services.

The recent reform efforts undertaken within the tourism sector have been accompanied by a restructuring process that has culminated in a new law approved on “Tourism” in 2023, enforced in 2024, indicating the heightened importance of the tourism sector as a matter of law.

At the level of the European Union, services related to tourism have been identified as a significant aspect of cross-border transactions involving consumers, especially online, thus pushing the modernization of consumer protection law, including Directive (EU) 2015/2302. There has been an

identification of a significant risk factor related to advance payments, multiple service contracts, as well as cross-border contracts, which can affect consumers, hence constituting a reason to strengthen consumer protection regarding insolvency protection.

These contextual indicators, while not constituting a statistical analysis in the strict sense, provide an empirical background that supports the legal and regulatory assessment conducted in this study.

ANALYSIS. Tourism activities in the European Union are regulated by the following directives:

1) *Directive 2015/2302 on Package Travel and Linked Travel Arrangements, whose aim was to adapt the package travel laws to modern internet booking patterns, especially to better protect customers who use several services.* Today, the majority of travelers book travel services online, and the booking process determines whether the traveler has booked a package, a linked travel arrangement, or simply separate services. This distinction is crucial for defining the legal obligations of tourism service providers and the level of protection afforded to travelers.

For this reason, the definition of "package" is expanded by Directive 2015/2302 on Package Travel and Linked Travel Arrangements, which now encompasses tailored combinations of online and offline travel services that are assembled at the traveler's request or in accordance with their choice. Furthermore, the directive presents the notion of "linked travel arrangements."

The directive ensures a high level of protection for travelers purchasing packages, including guarantees for reimbursement and repatriation in cases where the organizer becomes insolvent. It also establishes the organizer's responsibility for the execution of all travel services included in the package, ensures clear and comprehensive information for travelers, defines permissible circumstances for price changes, and more.

When a traveler books different travel services from the same website—for example, flights and accommodation—their rights depend on whether the services are offered, sold, or charged at an inclusive or total price, or whether the traveler is required to pay or agrees to pay separately for each travel service. In the first case, it constitutes a package, while in the second case, it is considered a linked travel arrangement.

Unlike in the case of a package, companies providing linked travel arrangements are only responsible for their own travel service. They must offer a refund guarantee for any payments received from the traveler if the travel service is not performed due to their bankruptcy.

However, entities facilitating linked travel arrangements are not liable for the performance (or potential insolvency) of any other travel service providers involved in the linked travel arrangement.

2) *Directive 2006/123/EC of the European Parliament and of the Council of 12 December 2006 on Services in the internal market.* The main objective of this directive is to remove barriers to the establishment of tourism-related activities and to simplify procedures for setting up new businesses. Its implementation has contributed to the elimination of certain licensing procedures for hotels, restaurants, and travel agencies. These have been replaced by a declaration of responsibility, which has become an important instrument in simplifying the establishment procedures in the tourism services sector. The directive also facilitates the provision of tourism services across the EU. Tour operators, travel agents, tour guides, and other market participants can offer their services in any EU member state without the need to establish a local presence. The directive further provides that each EU member state must have an online portal (Points of Single Contact), where service providers can find information on applicable requirements and submit applications for licenses or permits within that country.

3) *Directive 2011/83/EU of the European Parliament and of the Council of 25 October 2011 on Consumer rights.* The Consumer Rights Directive aims to establish a genuine business-to-consumer (B2C) internal market with a high level of consumer protection and a competitive environment for businesses. It ensures a consistently high level of consumer protection across the EU and helps the internal market operate effectively, particularly regarding contracts concluded between consumers and service providers. This regulation does not apply to package travel but applies to the provision of individual tourism services.

4) *Directive 2005/29/EC of the European Parliament and of the Council of 11 May 2005 concerning Unfair commercial practices.* This directive directly protects consumers' economic interests against unfair commercial practices between businesses and consumers. Additionally, it ensures fair competition in the industries it governs by indirectly shielding respectable companies from competitors that violate the directive's regulations. According to EU rules, national enforcement authorities take measures to combat unfair business practices, including providing misleading information to consumers or using aggressive marketing techniques intended to influence consumer choice.

5) *Regulation (EC) No 261/2004 of the European Parliament and of the Council of 11 February 2004 establishing common rules on compensation and assistance to passengers in the event of denied boarding, flight cancellations, or long delays.* This regulation applies to:

- Travelers travelling from an airport in a non-EU nation covered by EU treaties; and
- Travelers leaving from an airport in a non-EU nation and arriving at an airport in a non-EU nation covered by EU treaties, as long as the airline operating the flight is an EU carrier.

Regulation of the Tourism Sector in the Republic of Armenia

The regulation of relations in the field of tourism services in the Republic of Armenia is carried out through a number of regulatory legal acts, including the Constitution of the Republic of Armenia, the Law of the Republic of Armenia “On Tourism”, the Civil Code of the Republic of Armenia, Decision No. 76-N of the Government of the Republic of Armenia dated January 23, 2025, international treaties of the Republic of Armenia, and other legal acts.

In December 2023, the Republic of Armenia adopted a new Law “On Tourism”, which entered into force on September 1, 2024. The new Law of the Republic of Armenia “On Tourism” was revised taking into account European experience, aligning with the requirements of the EU Directive (Directive (EU) 2015/2302), and through consultations with experts from the United Nations World Tourism Organization (UNWTO), the International Forum of Travel and Tourism Advocates (IFTTA), and the World Federation of Tourist Guide Associations (WFTGA).

According to the law, some changes have been introduced in the tourism sector, in particular:

- It is established that the activities of individuals providing tourism services are subject to notification in accordance with the procedure defined by the Law “On Notification of Activity Implementation.”
- Rules and requirements for the provision of tourism services by entities engaged in tourism activities have been defined.
- The main provisions of the package travel contract (Article 23), financial guarantees, and other related regulations have been established.
- For the purpose of protecting consumer rights and interests, electronic registries for the provision of tourism services and tourism resources have been introduced (Chapter 3, Article 7).

The new Law “On Tourism” reflects the best EU practices in the field of state regulation of tourism, resource management, and requirements for the provision of tourism services. It is based on the provisions of Directive (EU) 2015/2302 on package travel and linked travel arrangements. In this context, it is necessary to carry out a comparative analysis to determine the extent to which national regulations align with the principles enshrined in the EU directive in terms of ensuring competition in the tourism sector and protecting consumer interests.

Liability Allocation and Insolvency Protection as Regulatory Instruments

The Directive (EU) 2015/2302 centralizes responsibility for performing a package travel agreement on the package travel organizer, which is not dependent on air carriers, accommodation providers, or any other subcontractors. By analyzing this from the regulatory perspective, it can be seen that risk

internalization applies in this context, where responsibility and risks associated with performance lie on one side of the market, that is, on professionals.

The liability structure has multiple regulatory purposes, too. First, it lessens informational asymmetry, as buyers are not required to seek out different suppliers in cases of non-performance. Second, it provides organizers with overwhelming incentives to screen suppliers effectively. Here, it can be argued that liability has become less of an issue of consumer protection, but more of a disciplinary measure in the market as well.

On the other hand, the Armenian Law “On Tourism” defines the financial guarantees for tour operators, but does not specify the extent to which the liability and the possibility of providing equivalent alternative arrangements are defined. In effect, liability is dispersed, and the allocation of risk is less definite. This makes the insolvency risk and the risk of performance greater, placing more of it on the customers and the small market players, especially in complicated journeys that involve several arrangements.

Its implications, as far as economic regulation is concerned, are of great significance. Centralized liability, as exists within the EU, acts as a filtering barrier to entry, which prevents financially undercapitalized or disorganized companies from delivering complex services. However, it seems that the Armenian system is more dependent on formal compliance procedures, which can be conducive to financially weaker companies operating successfully within their markets.

Table 1

Comparison of regulatory provisions in the tourism sector of the EU and the Republic of Armenia

	<i>EU Legislation</i>	<i>RA Legislation</i>	<i>Problem</i>	<i>Recommendation</i>
Package	<p>All sales including two or more distinct travel services for the same trip or vacation, booked under a single contract with a single supplier, are referred to as package travel. If any of the following circumstances are satisfied, package travel also covers sales where services are reserved through independent arrangements with various providers:</p> <ul style="list-style-type: none"> • The travel services are purchased at a single point of sale (such as a physical store, call center, or website), where the traveler selects the services before agreeing to payment—that is, before concluding the first contract. • The services were sold at an inclusive price. • The services were advertised or sold as a “package” or under similar terms. • Customers had the right to choose from a selection of travel services. 	<p>Tourism package means a combination of at least two separate tourism services for the same journey, where the services are combined (at the tourist’s choice) by the same tourism operator before the signing of a single contract, or, in the case of separate contracts, the services:</p> <ol style="list-style-type: none"> a. Are purchased from the same tourism operator and are combined before the traveler agrees to pay. b. Are offered, sold, or paid for at a total or inclusive price under the appearance of a single service. c. The total cost of these contracts is known as the “inclusive price.” d. The services are promoted as a “tourist package” or something like that. e. After signing a contract with the traveler, the services are combined at the traveler’s choice. 	<p>In the EU, the combination of travel services is classified as a package only if the additional service constitutes at least 25% of the total price of the trip or represents a significant part of the travel experience (for example, accommodation is combined with another tourism service, such as concert admission, attendance at sporting events or exhibitions, excursions, ski equipment rental, ski passes, spa services, medical treatments, and so on.)</p>	<p>The current regulations treat all packages equally, regardless of their level of risk.</p> <p>This standard allows for a distinction between simple ancillary services (e.g., a museum visit or a transfer) and complex packages that, in practice, require a higher level of legal and financial responsibility. Based on the above-mentioned international experience, it is proposed to revise the Law of the Republic of Armenia “On Tourism” and/or legal acts on consumer protection.</p> <p>By clarifying the regulatory framework, it will be possible to reduce the insurance costs for business entities, which in turn will affect the final price of travel packages, to the benefit of consumers.</p>

		<p>The services are purchased from different tourism service providers through interconnected online booking processes, where the personal data of the traveler—such as name, email address, and payment details—are transferred by the person who concluded the first contract to other service providers, and the contracts with those other providers are concluded within 24 hours after the confirmation of the first travel service booking.</p>		
<p>Linked travel arrangements</p>	<p>Packages must be separated from linked travel arrangements for transparency reasons. In linked travel arrangements, online or offline retailers simplify the purchase of travel services by requiring the traveler to sign contracts with several travel service providers.</p> <p>This includes linked booking procedures that don't fit the definition of a package and for which applying all package-related requirements would be inappropriate.</p> <p>In such cases, the traveler pays or agrees to pay separately for each travel service.</p>	<p>Such a definition is not provided.</p>	<p>Although complex in terms of measurement and classification, it may nonetheless lead to fragmentation in the provision of tourism services and to avoidance of responsibility.</p>	<p>The proposed intervention would be appropriate based on studies conducted at least three years after the implementation of the 2024 law.</p> <p>To ensure that travelers clearly understand and are able to make an informed choice regarding the services offered, economic operators must provide clear information indicating whether they are providing a linked travel arrangement or a package, along with the corresponding level of consumer protection, before the traveler agrees to make a payment.</p>

<p>Obligations of a tour operator or outbound travel agent, insolvency protection, consumer protection/ protection of consumers' interests</p>	<p>According to the Directive on Package Travel, the rules on liability are clear:</p> <ul style="list-style-type: none"> • The package organizer is responsible if something goes wrong, regardless of who actually provides the travel services (such as an airline, hotel, car rental company, etc.). • The organizer is required to provide travelers with an equivalent or better option at no extra cost if a sizable percentage of the travel services cannot be performed in compliance with the agreed criteria. • If the return of travelers cannot be ensured due to unavoidable and extraordinary circumstances (e.g., a storm), the organizer must cover the cost of accommodation for up to three nights. 	<p>Under the Law of the Republic of Armenia on Tourism and the Rules for the Provision of Tourism Services by Tourism Operators, a guarantee is established to ensure the fulfillment of obligations undertaken by the tour operator or outbound travel agent.</p>	<p>The Armenian legal framework does not specify the exact conditions for the application of the guarantee and does not define the possibility for the tour operator or outbound travel agent to provide alternative offers. An example of disproportionate legal regulation is a situation where a provider of low-cost goods or services, such as a budget accommodation provider, becomes liable for services beyond its control, for example, an expensive theatrical performance. Such a scenario may result in small businesses bearing disproportionately high risks for travelers, which in turn may lead to higher prices for consumers. An example of disproportionate legal regulation is a situation where a provider of low-cost goods or services, such as a budget accommodation provider, becomes liable for services beyond its control, for example, an expensive theatrical performance. Such a scenario may result in small businesses bearing</p>	<p>Assessment of Disproportionate Cost Burden on SMEs: This situation results in economic operators incurring relatively high costs to comply with regulatory requirements, which may be considered disproportionate in the context of the actual need for consumer protection. Possibility of Differentiating the Guarantee Amount Based on Outbound Travel Destinations: All other conditions being equal, a company offering low-cost packages is required to comply with the same obligations as one offering higher-value packages. Alternative strategies, such as differentiating between flight-inclusive and non-flight packages, establishing a minimum threshold, or permitting differentiation of the guarantee amount based on outbound travel locations, are suggested.</p>
--	--	--	--	---

			<p>disproportionately high risks for travelers, which in turn may lead to higher prices for consumers. As an alternative scenario, economic operators may avoid offering additional services to travelers to limit potential liability, which could result in consumers being deprived of the benefits of package offers.</p>	
<p>Regulation providing common standards for passenger assistance and compensation in the case of a flight cancellation</p>	<p>In the EU, travelers who have purchased a package (e.g., flight + hotel, car rental, etc.) are protected under the Directive on Package Travel and Linked Travel Arrangements, as well as the Regulation on Air Passenger Rights.</p> <p>According to both the passenger rights regulation and the package travel directive, any compensation or price reduction granted must be deducted from one another in order to avoid double compensation.</p> <p>It is important to note that neither the Air Passenger Rights Regulation nor the Package Travel Directive addresses the issue of who should ultimately bear the cost of overlapping obligations—the package organizer or the operating air carrier.</p>	<p>The level of protection of passenger rights remains relatively limited.</p>	<p>Under the new legislation, in the event of the insolvency of a national carrier, the responsibility falls on the travel agent or tour operator.</p>	<p>Review of Organizers, Air Carriers, and Existing National Legislation</p>

CONCLUSION. This study examined the regulatory frameworks governing the tourism sector in the European Union and the Republic of Armenia through a comparative legal lens, with particular attention to consumer protection and competition-related effects. The study shows that tourism regulation cannot be understood solely as sector-specific legislation but must be viewed as part of a broader economic governance, used to manage risk, promote market transparency, and maintain competitive balance.

The first important outcome of the research is the identification of two different regulatory models. The EU framework, as expressed in Directive (EU) 2015/2302, is based on a model of centralized liability and risk internalization, whereby the organizer of the package is made liable for the correct performance of all composite tourist services. This model decreases information asymmetry, increases confidence among consumers, and acts as a market-disciplining factor because economically weak or poorly organized tour operators are rejected. Moreover, the Armenian regulatory framework relies more heavily on administrative compliance and formal guarantees without a clearly articulated system of unified liability. Such an approach yields fragmented risk allocation and weaker regulatory incentives for market self-discipline.

The second scientific contribution of the research is the proof of the second hypothesis and the indication that the instruments of protecting consumers work as the policy of the scheme of the second category. Thus, the policy is about the transparency of the companies, the insolvency of the companies, and the responsibility of the companies. These are not just protective rules but the means of negation of the possible distortions of the competition. This is different from the Armenian system, which perceives the protection of consumers as a trust-building policy.

Third, it is clear that there is a proportionality problem that arises due to being structured. Harmonized financial guarantee provisions, if uniformly enforced irrespective of package levels of intricacy and cost, could create a level of mismatch between enforcement costs and volume for small to mid-sized businesses. Although it is true that there is a balance created by more defined financial responsibilities as well as typological distinction between travel packages and related travel combinations within the EU framework, there is no comparable system operating within Armenian law.

In the context of comparative analysis, this research can be seen to fill an existing literature gap on transition economies, since it demonstrates that the mere harmonization of legislation with the EU framework has little bearing upon the actual process of regulatory equivalence. This entails the non-exclusive transposition of the norm, but also the regulatory philosophy, especially concerning the allocation of risk, incentives of enforcement, and the proportionality principle.

The results of this study have policy implications. In the Armenian context, it is recommended that further refinement be carried out in relation to securing

certification in terms of guarantee requirements based on liabilities, while balancing protection for consumers with competition policy. In general, the paper contributes theoretically by way of conceptual analysis concerning the regulation of tourism in countries transitioning to European Union standards.

References

1. Akman, P. (2021). A competition law perspective on consumer protection. *Modern Law Review*, 84(2), 244–270. <https://doi.org/10.1111/1468-2230.12616>
2. Cafaggi, F., & Micklitz, H.-W. (2009). New frontiers of consumer protection: The interplay between consumer law and competition law. *Journal of Consumer Policy*, 32(1), 1–13. <https://doi.org/10.1007/s10603-008-9081-5>
3. Directive (EU) 2015/2302 of the European Parliament and of the Council of 25 November 2015 on package travel and linked travel arrangements, amending Regulation (EC) No 2006/2004 and Directive 2011/83/EU of the European Parliament and of the Council and repealing Council Directive 90/314/EEC.
4. Directive 2005/29/EC of the European Parliament and of the Council of 11 May 2005 concerning unfair business-to-consumer commercial practices in the internal market and amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC of the European Parliament and of the Council and Regulation (EC) No 2006/2004 of the European Parliament and of the Council (Unfair Commercial Practices Directive) (*Text with EEA relevance*)
5. Directive 2006/123/EC of the European Parliament and of the Council of 12 December 2006 on services in the internal market <https://eur-lex.europa.eu/eli/dir/2006/123/oj/eng>
6. Directive 2011/83/EU of the European Parliament and of the Council of 25 October 2011 on consumer rights, amending Council Directive 93/13/EEC and Directive 1999/44/EC of the European Parliament and of the Council and repealing Council Directive 85/577/EEC and Directive 97/7/EC of the European Parliament and of the Council Text with EEA relevance <https://eur-lex.europa.eu/eli/dir/2011/83/oj/eng>
7. Dredge, D., & Jenkins, J. (2011). *Tourism planning and policy*. Chichester: Wiley.
8. European Commission. (2019). Evaluation of Directive (EU) 2015/2302 on package travel and linked travel arrangements. *Brussels: European Commission*.
9. European Commission. (2020). Consumer markets scoreboard: Making markets work for consumers. *Brussels: European Commission*.
10. Hall, C. M. (2014). *Tourism and public policy* (2nd ed.). London: Routledge.
11. Law «On Protection of Consumer Rights». Adopted 26.06.2001.
12. Law of the Republic of Armenia “On Tourism”. Adopted on 22 December 2023, *entered into force on 1 September 2024*.

13. Micklitz, H.-W., & Reich, N. (2017). *The Court and sleeping beauty: The revival of the Unfair Contract Terms Directive (93/13)*. *Common Market Law Review*, 54(3), 771–808.
14. OECD. (2018). *Consumer policy and competition*. Paris: OECD Publishing.
15. Regulation (EC) No 261/2004 of the European Parliament and of the Council of 11 February 2004 establishing common rules on compensation and assistance to passengers in the event of denied boarding and of cancellation or long delay of flights, and repealing Regulation (EEC) No 295/91.
16. Riefa, C., & Weatherill, S. (2019). *Consumer law and policy in the European Union* (2nd ed.). Oxford: Oxford University Press.
17. United Nations World Tourism Organization (UNWTO). (2020). *International tourism highlights*. Madrid: UNWTO.
18. United Nations World Tourism Organization (UNWTO). (2022). *Tourism and jobs: A global overview*. Madrid: UNWTO.
19. UNWTO. (2020). *Tourism policy and governance: Supporting sustainable development*. Madrid: United Nations World Tourism Organization.
20. Weatherill, S. (2016). *EU consumer law and policy* (2nd ed.). Cheltenham: Edward Elgar Publishing.
21. World Bank (2021). *Tourism development and regulatory reform in emerging economies*. Washington, DC: World Bank.