BATA – Complete original reply

5 October 2026 | Robinson Tours EOOD | Complete reply, excluding quoted original inquiry and email signature graphics

Dear Mr. Pakuts, Thank you for your inquiry addressed to the Bulgarian Association of Travel Agencies – BATA regarding the case of Robinson Tours EOOD and for giving us the opportunity to present the professional position of the Bulgarian tourism industry.

BATA has reviewed the case, and we would like to state clearly that we do not approve of such practices or actions, which may undermine the confidence of tourists and business partners in the tourism sector.

The case is exceptional and, to the best of our knowledge, such a situation is not representative of the practice of the organized Bulgarian tourism industry over the past 10–15 years. With regard to your questions, we can provide the following information:

1. Was Robinson Tours EOOD a member of BATA, or was the company known to BATA?

Robinson Tours EOOD has never been a member of BATA and is not known to the Association as a member or partner. We will also make further inquiries among our members to establish whether any of them had professional contacts with or knowledge of the company.

2. Did any BATA member cooperate commercially with Robinson Tours EOOD?

Based on the information currently available to us, we are not aware of any BATA member having had a commercial cooperation with Robinson Tours EOOD. However, as this question also concerns the individual experience of our members, we will conduct an additional inquiry among them.

3. Were BATA or its members aware of delayed payments, unpaid invoices, financial difficulties, disputes or other warning signs before the company’s collapse?

BATA did not receive information regarding delayed payments, unpaid invoices, financial difficulties, disputes between business partners or other warning signs concerning Robinson Tours EOOD. At present, we are also not aware of any reports from our members concerning such circumstances prior to the public development of the case. We will nevertheless seek additional information from our members, as individual companies may have had direct business experience with Robinson Tours EOOD.

4. In BATA’s professional assessment, was the insolvency protection available to Robinson Tours EOOD adequate in relation to the actual scale of its business?

At this stage, BATA cannot provide a definitive professional assessment on this matter, as the competent authorities are examining the case and we do not have access to all relevant information concerning the actual scale of the company’s activities, its financial obligations and the circumstances that led to the current situation.

It is also important to consider that the mandatory Tour Operator Liability Insurance under Bulgarian legislation must be assessed within the framework of the applicable Bulgarian and European legislation. With regard to foreign tourists, including Hungarian citizens, the applicable consumer protection mechanisms in the country where the travel product was purchased, as well as the relevant European rules governing cross-border tourism activities, should also be taken into consideration.

5. Does BATA consider the current Bulgarian legal framework sufficient?

BATA believes that there is always room to improve the legal framework, particularly where practical experience demonstrates the need for stronger consumer protection and more effective supervision of tour operator activities. For many years, BATA has raised the issue that insolvency protection should be more closely connected to the actual volume of business, turnover and business model of the individual tour operator.

In this context, BATA has also been working on proposals to strengthen the existing protection mechanisms and to establish a Tourism Guarantee Fund, providing an additional mechanism of protection in situations of this nature.

6. What is BATA's professional position on a business model where a company is registered as a Bulgarian tour operator, but a significant part of its activity is conducted in another EU Member State?

BATA considers that such a business model cannot in itself be regarded as unlawful when it is carried out in compliance with European and national legislation. A company registered as a Bulgarian tour operator may conduct tourism activities in Bulgaria as well as cross-border activities in another EU Member State, provided that the applicable legal requirements are respected.

At the same time, where a significant part of sales, customer relations and operational activities is effectively concentrated in another Member State, we believe that there must be clear transparency and traceability of the business activity, as well as effective cooperation between the competent authorities of the countries concerned.

7. Should such a business model lead to enhanced supervision and closer cooperation between the authorities of the two countries?

Yes. BATA considers that cross-border tourism activities require closer institutional cooperation between the country where the tour operator is established and the country where a significant part of its actual business activity is concentrated. This is particularly important with regard to financial stability, consumer protection, information exchange and the ability of authorities to act promptly when risks to tourists arise.

8. Does the Robinson Tours case demonstrate weaknesses in the Bulgarian system?

In BATA's view, the case demonstrates the need for further discussion and improvement of the mechanisms for registration, supervision and insolvency protection of tour operators. For precisely this reason, BATA has already submitted proposals for legislative amendments, including changes to the registration regime for tour operators and higher requirements for carrying out tour operator activities.

Our position is that tour operator activities should be conducted by companies and individuals with the necessary professional experience, financial stability and genuine capacity to provide a secure and reliable tourism product. In this regard, BATA is proposing higher requirements for tour operator registration, including requirements concerning professional experience and financial stability.

9. Has BATA taken any action following the case?

Yes. Following the development of the case, BATA contacted the Bulgarian Ministry of Tourism and held discussions concerning the need to improve the regulatory and institutional framework. It is important to emphasize that Robinson Tours EOOD is not a member of BATA. Therefore, the Association cannot exercise internal control over the company or take action against it as a member.

Nevertheless, as a national professional organization representing the interests of the tourism industry, BATA has used this case to raise with the competent institutions the broader issue of necessary amendments to the Bulgarian Tourism Act, consumer protection and the supervision of tour operator activities.

10. Does BATA intend to propose legislative, regulatory or supervisory changes?

Yes. BATA, as a professional tourism organization with a 34-year history, continuously works to improve the regulatory environment in the tourism sector and has repeatedly submitted proposals for amendments to the Bulgarian Tourism Act.

Our key areas of work include strengthening the requirements for tour operator registration, more effective supervision, improved consumer protection, strengthening insolvency protection mechanisms and the establishment of a Tourism Guarantee Fund. Our objective is to create a safer and more predictable environment both for Bulgarian tourists and for foreign tourists choosing Bulgaria as a destination.

Additional information concerning possible prior warning signs

Regarding your question as to whether other companies operating on the Bulgarian tourism market were aware of problems concerning Robinson Tours before the company's difficulties became public, at present we do not have information confirming this.

Robinson Tours EOOD was not a member of BATA and, to the best of our knowledge, a significant part of the activity relevant to the current case was directed towards the market of another EU Member State. Consequently, BATA did not have access to information concerning the company's internal financial or operational situation.

At the same time, as some of your questions require information based on the practical experience of individual tourism companies, we will circulate an inquiry among BATA members. Collecting and verifying this information will require some time.

If we receive additional specific information that can appropriately and responsibly be shared, we will be pleased to provide it to you.

BATA believes that cases of this nature should not be viewed solely as an issue concerning one individual company. They should serve as an opportunity to analyse and improve the overall system, with the aim of ensuring stronger protection for tourists, greater financial sustainability of tour operators and more effective cross-border institutional cooperation and supervision.

Thank you for your professional interest in the matter. We remain at your disposal for any further exchange of information on this subject.

Yours sincerely,
Odysseus Spasov
Chairman
Bulgarian Association of Travel Agencies – BATA