

# Public consultation on a possible initiative at EU level in the field of passengers rights in multimodal transport

Fields marked with \* are mandatory.

## Introduction

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**\*\* NOTE: You can change the language of this form in the menu on the right \*\***

The European Commission wants to examine options to better protect passengers in the EU when using multimodal transport. The aim of the present open public consultation is to seek the opinion of the general public about key elements of the impact assessment:

- the problems that passengers face when combining different modes of transport for the same journey, including the drivers as well as the roots of the problem,
- the options to be assessed, and
- the likely impacts of each option.

## Transparency and confidentiality

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\*The contributions received in the context of this public consultation will be published on the internet together with the identification data of the respondent unless the respondent requests that his or her contribution should be published anonymously.

Please indicate your preference as regards publication of your contribution:

- My contribution may be published under the name indicated (organisation / association / authority you represent)
- My contribution may be published but should be kept anonymous

Explanations about the protection of personal data are available on: [http://ec.europa.eu/geninfo/legal\\_notices\\_en.htm#personaldata](http://ec.europa.eu/geninfo/legal_notices_en.htm#personaldata)

The policy on "protection of individuals with regard to the processing of personal data by the Community institutions" is based on [Regulation \(EC\) N° 45/2001](#) of the European Parliament and of the Council of 18 December 2000.

\*May the Commission contact you, in case further details on the submitted information in this questionnaire are required?

- Yes
- No

## A. Identification of the respondents

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1. In what capacity are you completing this questionnaire?

- In my private capacity
- On behalf of an organisation, association, company, authority etc.

\*1.a. Please identify clearly which organisation / association / authority you represent?

*500 character(s) maximum*

European Passengers' Federation EPF [www.epf.eu](http://www.epf.eu)

\*1.b. Is the entity on whose behalf you are replying registered in the EU Transparency Register?  
If your organisation is not registered, we invite you to [register](#), although it is not compulsory to be registered to reply to this consultation.

[Why a transparency register?](#)

- Yes
- No

\*1.c. If so, please indicate the registration number in the Transparency Register

*30 character(s) maximum*

532739823521-44

\*2. Please provide your first name

*100 character(s) maximum*

Josef

\*3. Please provide your last name

*100 character(s) maximum*

Schneider

\*4. Please provide your email address

josef.schneider@epf.eu

\*5. Which of the following categories best describes your activity or that of your members?

- Passenger – Citizen
- Organisation representing passengers/consumers
- Organisation representing persons with disabilities or persons with reduced mobility
- Railway undertaking
- Air carriers
- Air terminal operators
- Port terminal operators
- Ferries, cruise or inland waterway boat operators
- Bus/Coach companies
- Station staff (station manager, other)
- Infrastructure manager
- Public authority (Member State representative, Ministry, Agency, National Enforcement Body, other)
- Workers' organisation
- Tour operator
- Consultancy
- Ticket vendor
- Industry federation
- Research / Academia
- Organisation representing environmental / climate stakeholders
- Other

\*6. Please specify your main country(ies) of operations (for organisations max. 3) or residence (for citizens)

*between 1 and 3 choices*

- |   |  |   |
|---|--|---|
| <input checked="" type="checkbox"/> EU-wide         | <input type="checkbox"/> Global          | <input type="checkbox"/> Austria        |
| <input type="checkbox"/> Belgium                    | <input type="checkbox"/> Bulgaria        | <input type="checkbox"/> Croatia        |
| <input type="checkbox"/> Cyprus                     | <input type="checkbox"/> Czech Republic  | <input type="checkbox"/> Denmark        |
| <input type="checkbox"/> Estonia                    | <input type="checkbox"/> Finland         | <input type="checkbox"/> France         |
| <input type="checkbox"/> Germany                    | <input type="checkbox"/> Greece          | <input type="checkbox"/> Hungary        |
| <input type="checkbox"/> Ireland                    | <input type="checkbox"/> Italy           | <input type="checkbox"/> Latvia         |
| <input type="checkbox"/> Lithuania                  | <input type="checkbox"/> Luxembourg      | <input type="checkbox"/> Malta          |
| <input type="checkbox"/> Netherlands                | <input type="checkbox"/> Poland          | <input type="checkbox"/> Portugal       |
| <input type="checkbox"/> Romania                    | <input type="checkbox"/> Slovak Republic | <input type="checkbox"/> Slovenia       |
| <input type="checkbox"/> Spain                      | <input type="checkbox"/> Sweden          | <input type="checkbox"/> United Kingdom |
| <input type="checkbox"/> Other, non-EU Member State |  |   |

7. For citizens only: Is your country of residence the same as your nationality?

- Yes
- No

### Use of multimodal transport services

The following questions 8 to 11 should only be replied by **citizens** who have made **use of multimodal transport services**, when several modes of transport have been used **to complete a journey**. As mentioned, the purpose of this consultation is to collect views on how to improve passenger rights in case of travel disruptions when two or more different modes of transport are used.

Please note that urban or local public transport services (including taxis) do not fall under the scope of this consultation.

For the purpose of this consultation, only the following journeys including at least two combinations should be considered:

- By planes: flight operated by commercial air carriers
- By rail: interurban domestic or cross-border services (excluding urban or regional services)
- By coach: interurban domestic or cross-border services (excluding urban or regional services)
- By ship: ferries, cruise, inland water transport

8. Please specify which combination of modes of transport mostly reflects the type of multimodal transport services you have used and at which frequency

	At least once per week	At least once per month	At least once every 3 months	At least once per year	Never
Rail/Plane	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rail/Coach	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Plane/Coach	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rail/Ship	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Coach/Ship	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Plane/Ship	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

9. In general, your travel tickets are provided by:

- A travel agent
- Purchasing them directly from the transport company (ticket desk or online)
- By purchasing them online via booking systems
- Other

10. Which answer best reflects the purpose of your multimodal travels in the past 12 months?

- I travelled only for business purpose
- I travelled 75% for business, 25% for leisure
- I travelled 50% for business, 50% for leisure
- I travelled 25% for business, 75% for leisure
- I travelled only for leisure purpose

## B. General relevance of the initiative

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The overall objective of this initiative is to ensure an adequate level of protection for passengers when using a combination of different transport modes during their journeys in the EU.

The situation described below illustrate the type of problems which may arise in the context of a multimodal journey:

A passenger living in an EU city wants to reach a final destination to another continent. The passenger chooses to use rail as a transport mean to reach an airport in another EU member State from where a long haul flights can be taken to reach the final destination to another continent. Unfortunately, the train arrives at the airport with a 60 minutes delay and consequently the passenger misses the flight to his final destination. Since the delay was due to the train the passenger will only benefit from Regulation 1371/2007 on rail passenger rights for that part of the journey and not from Regulation 261/2004 on air passengers' rights. In this case, the passenger will receive as compensation, 25% of the price of the train ticket corresponding to that part of the journey and no assistance and care (e.g. meal, hotel accommodation, etc.) at the airport. In case the journey had been solely done by air, then in this case Regulation 261/2004 on air passengers' rights would apply to the entire journey. In that case, the passenger would have the right for care and assistance at the airport and a higher compensation of up to 600 EUR.

1. **For citizens only:** Are you familiar with the provisions of the existing passenger rights regulations in the different transport modes?

	Yes, very well	Yes, well	No, not well	No, not at all	No opinion
Air	<input type="radio"/>				
Bus & Coach	<input type="radio"/>				
Rail	<input type="radio"/>				
Waterborne	<input type="radio"/>				

2. To what extent do you agree with the following statements concerning multimodal journeys?

	Strongly agree	Somewhat agree	Neutral	Somewhat disagree	Strongly disagree	No opinion /not sure
Passengers are well informed about their passenger rights	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Passengers are well informed as to whom they can complain if their rights are not respected	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Passengers receive correct, complete and transparent information about the full ticket price for the whole journey.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

<p>Passengers are well informed about the details of the whole journey (schedule, transfer time, on-board facilities including for passengers with disabilities or reduced mobility, etc.)</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>Passengers are well informed in the event of disruptions affecting one specific segment of the journey (such as long delays, cancellations)</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Passengers receive assistance (meals, accommodation, etc.) in the event of disruptions during their multimodal journey



### 3. Please feel free to explain below your answer in detail

*1500 character(s) maximum*

On 3: Passengers do not always receive correct, complete and transparent information about the full ticket price. They are sometimes interested in the composition of their ticket prices but cannot access the information. Rail and bus transport tickets usually do not include a complete break-down of cost components, divided by journey segment. In aviation, some charges are displayed on tickets, but e.g. no airport charges or the full set of different taxes (Value-added tax, national levies, CO2 price or cost of the rail section).

On 5 & 6: Passengers are often not well informed about disruptions affecting their journey. With some effort it is usually possible to obtain real-time information on little delays through digital tools. In the case of long delays and disruptions information policy is often bad. As passengers we regard information policy as a central pillar of service quality. Passenger information should be considered as integral part of 'soft' performance measurements e.g. when tendering services. We would favour targets, incentives, obligations & penalties for operators to deliver on service quality in terms of passenger information. Some of the regulatory obligations already cover necessary compensation such as meals, accommodation. Again, this only applies to sections rather than the integral chain of the multimodal journey.

### 4. The following passenger rights might be relevant in the case of multimodal journeys. Please rate the importance of these rights in the context of multimodal journeys.

	Very Important	Important	Not very important	Not important	No opinion
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Information provided by transport companies or their agents to passengers on their rights	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Carrier's liability in case death or injury of the passenger or loss or damage of the luggage	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-discrimination regarding ticketing (e.g. availability, choice, price, sales channels)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Obligations of transport undertakings to passengers in the event of long delays, cancellations or missed connections (information, assistance, compensation)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Choice for passengers to cancel their trip and request reimbursement in the event of long delays, cancellations or missed connections	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Access to transport services for persons with disabilities or with reduced mobility (prohibition of discrimination, assistance)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accessibility of connecting points between transport modes for persons with disabilities or with reduced mobility	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Taking care of passengers, ensuring the continuation of their journey or bringing them back to their point of departure in the event of major transport disruptions (caused by e.g. extreme weather conditions or major natural disasters)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Effective enforcement of passenger rights by national authorities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

4.a. Please specify "Other"

*100 character(s) maximum*

5. In conclusion, do you think that there is a need to address these issues at EU level aimed to enhance passenger rights in multimodal transport as well?

- Yes
- Yes, to a limited extent
- No
- No opinion

### 5.a. Please explain your answer

*1500 character(s) maximum*

We welcome the initiative of the European Commission to address the improvement of multimodal passenger rights and we share the observations stated in the Inception Impact Assessment of the European Commission published in December 2016. Further EU legislation on multimodal journeys would be a continuation of the EU's successful activities on (the various modal) passenger rights in the past. Extending the legislation on passenger rights to multimodal journeys is of key relevance to passengers as most journeys are effectively multi-modal. As indicated in the inception impact assessment, there is an obvious shortfall of regulation at the connection between modes, hindering the development of seamless transport chains. We believe that EU-level action is required rather than national initiatives as a large part of multimodal transport is long-distance international travelling and passenger rights are most needed in those travel cases. We hope that EU action will provide a clear solution on liabilities and passenger rights in multimodal transport, so as to incentivize the offering of multi-modal transport solutions by the industry. We urge the Commission to pursue its future legislation activities bearing the interest of passengers in mind.

### 6. Comments

*1500 character(s) maximum*

In general, from a user's point of view there is a need to understand journeys in their full extension as a door to door trip. This means any action has to cover full travel-information, through ticket and options for through booking over the whole journey. Any operators need to collaborate in case of problems and take responsibility to the passengers.

## C. Assistance to persons with disabilities or with reduced mobility

The existing EU passenger rights Regulations for the different transport modes provide for non-discriminatory access conditions for passengers with disabilities or with reduced mobility. The Regulations impose certain obligations on transport companies and third parties such as airport, railway undertakings, terminal operators, station managers in order to allow such passengers to use transport services under comparable conditions as other passengers. However, the rights for passengers with disabilities or with reduced mobility are not fully protected when using multimodal transport services.

Thus, in case that the passenger mentioned the previous example who was travelling from an EU Member State to another continent is a disabled person he/she will need assistance as from the moment he/she disembarks the train to the moment he/she boards the plane.. Currently, according to the Regulation on rail passenger rights, rail operators have the obligation to provide assistance until the designated point within the railway station. According to the Regulation on air passenger rights, the obligation of air operators starts from the designated point in the airport. In the case that these two designated points are not the same, the disabled person is left without assistance between those designated points.

1. **For citizens only:** Have you ever requested assistance for yourself or another person with disabilities or with reduced mobility when travelling with several modes of transport ?

- Yes
- No
- No opinion

2. How do you assess the following services offered to persons with disabilities or with reduced mobility when using multimodal travelling?

	Very good	Good	Neither good nor bad	Bad	Very bad	No opinion
The general information about the accessibility of multimodal transport services e.g. during transfer from one mode to another	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accessibility of travel information provided before and during the journey (in accessible format taking into consideration their special needs)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accessibility of stations, platforms, rolling stock and other facilities	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Assistance provided during boarding, disembarking and on-board	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Financial compensation in case of loss or damage to mobility equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

2.a. Please specify "Other"

*1500 character(s) maximum*

3. Does the assistance provided to persons with disabilities or with reduced mobility at transfer points in case of multimodal transport need to be improved?

- Yes
- No
- No opinion

3.a. If yes, please provide any additional comments on the level and/or means of intervention required in order to improve such assistance?

*1500 character(s) maximum*

## D. Other questions

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1. Are there any other issues related to multimodal passenger transport which you consider should be tackled? Please give details.

*1500 character(s) maximum*

### HARMONISATION

In order to ensure a level-playing field for competition between transport modes, it would be favourable to bring passenger rights in the various modes of transport into a comparable range. If passenger rights were uniform, the offering of combined transport solutions would be easier from the perspective of providers and it would be easier for the customer to understand the rules.

### THROUGH-TICKETING

EU-legislation will have to strike a good balance between granting high-level passenger rights and incentivizing the offer of multimodal ticketing. Our hope is that legislation on passenger rights for multimodal transport incentivizes the offering of through-ticketing solutions across borders and modes of transport by giving clear indication on the legal setting of passenger claims in multimodal transport. Once this clarification is there, operators and passengers shall both have an interest in offering and using multimodal contracts of carriage.

### THROUGH-BOOKING

New services using IT will enable ticket-vendors to combine different offers from various operators as one through-booking for the customers. As a basic to develop such offers, information on time-table (including real-time-information), tariff and services must be available in a technical standard and reliable quality.

### NATIONAL ENFORCEMENT BODIES

An extended responsibility of national enforcement bodies for multimodal transportation as indicated in the Inception Impact Assessment 12/16 is appreciated

2. Please provide references to any studies or documents that you think are relevant for this consultation, with links for online download where possible.

*1500 character(s) maximum*

VDV, 2012. Vom Verkehrs- zum Mobilitätsbund - Die Vernetzung von inter- und multimodalen Mobilitätsdienstleistungen als Chance für den OV (Accessible on: <https://www.vdv.de/multimodale-mobilitaet.aspx> , last check on 30 April 2017)

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## Useful links

[Consultation page \(https://ec.europa.eu/transport/themes/passengers/consultations/2017-pax-rights-multimodal-transport\\_en\)](https://ec.europa.eu/transport/themes/passengers/consultations/2017-pax-rights-multimodal-transport_en)

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## Contact

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