

EPF's Complementary Contribution to the Public Consultations on the Next Multiannual Financial Framework (MFF) post-2027

In view of the next Multiannual Financial Framework (MFF), the European Passengers' Federation (EPF) calls upon the European Commission to prioritise investments in public transport, ensuring that passengers – EU citizens – have access to a public transport system that is affordable, dependable, accessible and coordinated, with sufficient capacity to get people comfortably to where they want to go at the times they wish to travel. In parallel, the MFF should make financial provision to allow for stronger end-user/passenger representation in EU policy-making and R&I projects, to make sure that public investments are in line with end-users' needs and that their rights are adequately protected, monitored and enforced.

The European Passengers' Federation's mission – in line with the role of public transport for people and society – lies at the intersection of two domains closely linked to important EU values and policy objectives: environment/ climate action and consumer protection/ social justice.

Strong consumer protection is enshrined as a core principle in the EU's Founding Treaties and the Charter of Fundamental Rights of the European Union. Furthermore, transport is recognized as an **essential service** by the European Pillar of Social Rights, and is considered a Service of general economic interest (SGEI), as defined in the Treaty on European Union: These services are not only crucial to meet basic human needs; they also facilitate access to other services, necessary to participate fully in society and safeguard social inclusion.

At the same time, in terms of guidance on **environmental and climate aspects**, the Green Deal Communication (2019) and the accompanying Sustainable and Smart Mobility Strategy and Action Plan (2021) have set out the main outlines for the EU strategy for sustainable mobility, highlighting the need to put users first and to make affordable, accessible, healthy and sustainable alternatives more widely available, to enable better modal choices.

Transport currently accounts for around 25% of overall EU greenhouse gas emissions as well as over 25% of its energy consumption. Achieving a sustainable future for Europe requires prioritising the shift to greener modes of travel, such as public transport. To **facilitate a modal shift** to rail and multimodal mobility, while leaving no one behind, adopting a **user-centric perspective** is key. Availability of an attractive offer, in terms of travel time & cost, is crucial, pointing towards the need to address missing (cross-border) links and ensure maximal interconnectivity between the core TEN-T network and local and regional public transport, with multimodal hubs playing a vital role. In addition, improvements are needed in terms of integrated information and ticketing, and passenger protection.

Passengers, as the **weaker party to the service contract**, must be treated fairly when things go wrong with their journey. Passengers' willingness to choose public transport is compromised by fears that in the event of disruption, they will not receive adequate assistance or be able to reach their final destination at the earliest available opportunity without paying additional charges. At the same time, **informed consumers are essential to any truly competitive market**. To make informed choices, passengers need to be aware of the existing travel options and be able to easily plan, book and pay for their (multimodal) trip in a one-stop-shop.

End-user **awareness** of EU Regulations directly relevant to them, for example on passenger rights, is still (too) low. There also appear to be considerable variances in terms of **compliance and enforcement**, as shown for example by a special report of the European Court of Auditors (2021)¹ as well as evaluation reports of other, mode-specific passenger rights regulations². While the Passenger Mobility Package (2023)³ aimed to address some of the identified barriers, in EPF's view further efforts are needed to ensure effective enforcement and compliance, and to empower passengers and increase awareness of their rights.

Considering the above, **EPF's priorities for the next Multiannual Financial Framework** can be summarised as follows⁴:

- **Harmonise implementation and enforcement** of passenger rights and other legislation relevant to passengers across the EU, thereby better protecting passengers and enhancing the competitiveness of more environmentally sustainable mobility modes;
- **Focus Research & Innovation projects on user needs**, ensuring that technical innovations create added value and align with real wishes and needs; this should be a central point of attention and evaluation criterion for any mobility related projects and investments;
- **Enhance the social climate fund** by making room for transport-related projects that adopt a user-centric approach and guarantee access to transport, thus addressing transport poverty and in general, recognizing the social role of public transport;
- **Invest in infrastructure** that focuses on missing links in the public transport network, maximises interconnectivity, and improves connections with local and regional transport, recognizing the importance of thinking in terms of 'a network of networks' and facilitating end-to-end journey making;
- **Empower strong representation of end-users** by fostering their engagement in relevant representation bodies and advisory groups, thus allowing them to advocate more efficiently passengers' interests and impact on policy and R&I priorities related to transport and mobility.

¹ <https://www.eca.europa.eu/en/Pages/DocItem.aspx?did=58696>

² https://transport.ec.europa.eu/facts-funding/studies-data/evaluations_en

³ https://transport.ec.europa.eu/news-events/news/passenger-mobility-package-2023-11-29_en

⁴ These objectives are aligned with EPF's priorities for EU action: <https://www.epf.eu/wp/wp-content/uploads/2024/05/EPF-priorities-24-04-10.pdf>

By **bringing in the end-user perspective**, passenger organisations, like EPF and its members, can significantly contribute to EU transport policy by:

- **Collecting input and feedback** from passengers across Europe on how EU policy is perceived, implemented and enforced, hereby also working on higher acceptance and awareness of EU policy's impact on people's daily lives – including mobility;
- **Channeling input from passengers** across Europe effectively towards EU-level decision-makers and funding programmes, including creative and perhaps out-of-the-box ideas for new solutions or policy initiatives, identifying and addressing issues that affect passengers on a higher than national scale, and that are currently insufficiently considered.

To bridge the gap and to facilitate interaction between EU-level policy makers and end-users, EPF proposes to set up a '**passenger observatory**', which would collect input from the grassroots level or civil society to feed into the policy process, but also vice versa, communicate and disseminate EU policy to civil society and end-users. Thus, the 'passenger observatory' would encompass several aspects:

- **Monitoring compliance with and enforcement of existing EU regulations**, evaluating to which extent these are implemented across EU Member States, identifying gaps where additional efforts would be welcome;
- **Monitoring the progress of sector initiatives**, such as the [Ticketing Roadmap](#) by CER, or the [Agreement on Journey Continuation](#) by CER/CIT, by developing a set of measurable KPIs;
- **Benchmarking performance and collecting best practices** in terms of e.g. compliance with passenger rights' regulations – including monitoring of Public Transport service quality –, integrated information and ticketing initiatives (including cross-border) based on open data, ...
- **Raising awareness and increasing acceptance of EU policy** related to transport and mobility, focusing on aspects that impact public transport users, e.g. in terms of setting the right pricing signals, improving easy information and ticketing, extended passenger rights, etc.

Civil society organisations, including EPF, are equipped with the expertise to advance such ambitions, and we welcome a post-2027 Multiannual Financial Framework that **reflects the needs of passengers – EU citizens – and empowers their active participation** in the development of EU policy and R&I as described.

Whilst European acquis acknowledges that passengers are the weaker party in the transport contract, greater effort is still needed to connect with them and, where possible, to ensure they are encouraged to participate in policy development processes. However, the costs of representation at European level are a heavy burden to passenger representatives and civil society organisations. Yet **without effective representation there is a democratic deficit** that needs to be addressed. The new MFF should therefore make financial provision for this.