

To: Members of the TRAN Committee

15/12/2016

Dear Madam, Dear Sir,

At their recent General Meeting, the representatives of the European Passengers' Federation (EPF) member associations discussed the Commission's report to the European Parliament and European Council on the operation and the effects of Regulation 181/2011 concerning the rights of passengers in bus and coach transport. This report has been issued pursuant to Article 32 of the Regulation. EPF members' representatives came to the following conclusions:

- 1. EUROSTAT presently lacks sufficient appropriate data to inform judgements on long distance coach travel despite the recent rapid growth in this market in the EU.
- 2. In the absence of such data from EUROSTAT the European Commission has drawn on data collected by the National Enforcement Bodies in 2013 and 2014. This data fails to capture recent trends such as, for example, the mushrooming number of complaints reflecting these developing market conditions that have been recorded by the German National Enforcement Body.
- 3. Further, the Commission appears not to have taken into account the evidence available from the work of the Alternative Dispute Resolution bodies. Again, evidence from Germany shows a rapid increase in these complaints.

EPF therefore rejects the Commission's proposal made in accordance with its duties under Article 32 of Regulation 181/2011 that no changes are required to the passenger rights regime for long distance coach travel. EPF asks the TRAN Committee of the European Parliament to consider undertaking an own initiative report which draws together and reviews all appropriate available data in relation to passenger rights and the recent rapid growth in the market for long distance coach services in the EU.

Yours sincerely

J. Samerich

Josef Schneider Chairman of EPF