

For any clarification questions, please contact Mr. Sean Barker on +44 207 910 5247 or by emailing [passenger.rights@steergroup.com](mailto:passenger.rights@steergroup.com).

- If any part of your response is confidential, please highlight the confidential cell in yellow.

Questions		Responses (please expand the row height/column width for each response box as required)
<b>Background Information</b>		
B1a	1 Please briefly describe the activity of your organisation and in particular whether you cover passengers in other modes (e.g. air, rail, bus and coach).	The European Passengers' Federation brings together national and regional passenger associations from more than twenty European states. It seeks to represent passengers' interests at European level, working constructively with the transport industry and policy makers.
b7	Please explain:	
b7a	a) how you interpret "at the earliest opportunity" with respect to rerouting passengers who experience travel disruptions (does it include the use of competitors' services?). How compliant do you think that carriers are with this? How you interpret "partial compensation of the ticket price"? How compliant do you think that carriers are with this?	As soon as the carrier becomes aware that there is a problem, carriers tend to concentrate on resolving operational problems and are quite poor in advising passengers what the delay is and what actions they are going to take. Evidence has shown that if you take time to talk to passengers and update them as to what is happening, you are managing their expectations which results in a greater understanding of the situation.
b7b	b) how compliant carriers (or other performing parties) are with not discriminating based on the nationality of the final customer or on the place of establishment of carriers or ticket vendors within the Union.	No information
b7c	c) how compliant carriers are with ensuring that passengers (including PRMs) are kept informed about their journey before, during and after travel in case of travel disruptions.	In general, it is crucial to ensure good information to passengers at traffic disruptions.
b7d	2 d) what the most frequent situations are, if any, when carriers refuse embarkation/reservation by PRM on safety grounds or other reasons, or ask them to be accompanied by a safety assistant.	No information
b7e	e) what the most frequent situations are, if any, when carriers refuse embarkation/reservation by PRM on the grounds that the design of the vehicle or infrastructure is not adequate.	The main problem is that stations, stops and jetties are often managed by other actors than the operator, which makes it difficult to provide relevant accessibility information to PRM passengers.
b7f	f) what mechanisms are provided to enable PRMs to notify requirements for assistance at points of sale.	No information
b7i	i) how compliant carriers are with ensuring that passengers (including PRMs) are informed about their rights.	Reviews show regularly that only a limited amount of operators provide sufficient and accessible information about passenger rights.
b7j	j) what communication systems terminal managing bodies have in place for PRMs to notify their arrival and need for assistance.	No information
B8	3 How many Regulation 1177/2010-related complaints have you received annually and what are the main types of complaints? How many complaints annually (in % of total) are related to PRM-related provisions of Regulation 1177/2010 and what are the main types of complaint? How many complaints are resolved at your level? Do you think this reflects the real number of cases? If not, what are, in your opinion, the reasons for the low number of complaints compared to the real number of cases?	Please provide quantitative data in the data sheet, and answer the remaining parts of the question below.  Complaints usually are received by EPF's member organizations. Only a very small proportion is forwarded to EPF with a request for support. EPF has not allocated any personnel resources for this purpose.
B11	4 To what extent have complaint handling procedures (of performing parties and/or NEBs) changed since the Regulation came into force in 2012?	No information
B12	5 What measures are in place to ensure that passengers (including PRMs) can make a complaint to a carrier, terminal managing body, other performing party, and/or NEB, and that the complaint is adequately addressed without undue delays and complications for the passenger?	No information
B13	6 Have you undertaken any surveys of the satisfaction of passengers travelling by sea or inland waterways? Do you have any evidence of how far different passenger groups (including PRMs) are satisfied with the passenger protections provided?	No
<b>Relevance</b>		
R1	7 What do you think are the current priority needs of passengers travelling by sea or inland waterway (including PRMs)? Have these changed since the Regulation was implemented in 2012?	Current passenger priority needs are to travel as quickly and safely as possible in exchange for a value for money price. Clear information regarding journey times and fares. Vehicles used to be clean, safe and comfortable which are driven to a high standard. Information about delays and how any impacts to the consequences can be mitigated.
R1A	a) In addition: Should the Regulation make specific provisions for passengers travelling with cars? If so, what protections could these have?	No. It is a considerably greater problem ensuring good conditions for foot passengers. There is a major challenge in achieving a reasonably acceptable level for these passengers today.
R2	8 Compared to 2012 when Regulation 1177/2010 came into force, have there been any technological or scientific advances that may help/obstruct passengers travelling by sea or inland waterway (including PRMs)? And in the future? Please distinguish between:	Digitization has had a major impact in the transport sector over the past decade and has given the operators great opportunities for efficiencies. However, it is very uncertain whether this streamlining has benefited passenger with lower costs. Rather, it has led to a deterioration for those who do not use digital services.
r2a	a) General technological changes;	
r2b	b) Changes affecting the waterborne transport sector; and	
r2c	c) Changes affecting PRMs (e.g. social, population, legal).	
r2d	d) other developments.	
<b>Effectiveness</b>		
E1	9 To what extent has Regulation 1177/2010 changed the protection provided to passengers compared to the period prior to its implementation in 2012?	
e1a	a) Which factors have contributed to/hindered the achievement of the objectives of Regulation 1177/2010?	Common EU minimum level for travel rights has been positive for development.
e1b	b) How much have the exemptions allowed under the Regulation been exercised? What would happen if these exemptions did not exist?	Exceptions rarely favor common legislation.
e1c	c) Are key terms in the Regulation sufficiently well defined to support effective implementation?	No
e3	10 Has Regulation 1177/2010 had any impact on (please explain):	
e3a	a) ensuring that non-discriminatory ticket fares and contract conditions apply to every passenger?	No information.
e3c	b) how you ensure that PRMs have equal right to travel by sea or inland waterway to that of all other passengers?	Difficulties are mainly related to the answer in 2e.
e3d	c) how you ensure that passengers are informed of their rights and are able to exercise them in practice by accessible and user-friendly complaint procedures?	Even good legislation needs regular monitoring about customers satisfaction. For EPF no data on this is available.
e3e	d) the service quality delivered to passengers?	No information

e3g	f)	on fares?	In most European countries there is no national neutral ticket sales platform for public transport tickets and there is no legal support for this which is a major shortcoming for passengers.
e5		How well do you think that the NEB complaints-handling and enforcement processes are working?	No detailed information
e5		In addition:	
e5a	a)	Please explain the reasons.	
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e5b	b)	Do you think that financial penalties (or other sanctions) are effective, dissuasive and proportional?	
e5c	c)	Do you think that sanctions affect the reputation of carriers or other performing parties?	
e6		What is your interpretation of "extraordinary circumstances"? Does this interpretation usually align with that of the carriers? What information is provided by carriers as evidence?	The passenger is always the weaker party in relation to the transport company. In principle, therefore, "extraordinary circumstances" cannot be an exception to the passenger's disadvantage.
e6	12	In addition:	
e6a	a)	How has the COVID-19 situation been treated (by operators and/or NEBs) with respect to extraordinary circumstances? Has a distinction been made between cancellations resulting from government-imposed measures (e.g. border closures) and any cancellations in response to reduced passenger demand?	See EPF's regular COVID-19 update
e7	13	How well do you think that passenger rights are protected in the case where operators become insolvent? Are you aware of any good examples?	No information
<b>Cost efficiency</b>			
ce1	14	What costs (financial and non-financial) do passengers incur in order to enforce their rights? How does this compare to the situation before the Regulation's implementation?	The time to complete a complaint handling procedure needs to be proportionate to the amount of the compensation, otherwise many passengers never will apply for compensation.
ce2	15	What benefits do you think the Regulation has generated for passengers (e.g. assistance received for passengers (including PRM) in case of disruption, time saving, compensation received in case of disruption) and for performing parties (e.g. do carriers benefit from increased demand, increased market share, other)?	In particular it has contributed to increased confidence in traveling by boat which has been beneficial for both passengers and operators.
ce3a	a)	Do you consider the time thresholds for triggering rerouting, reimbursement, assistance and/or compensation to be appropriate?	Reasonably, but with digitization and automation, disruption information and compensation should be able to be personalized easily and handled directly.
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ce3b	b)	Do you consider the level of compensation to be appropriate?	As long as compensation is not refunded automatically, a higher level of compensation is required to compensate the time for manual handling of the complaint.
<b>Coherence</b>			
c3	17	Is there coherence with the wider relevant transport policy framework, for example in respect of safety and security, accessibility, other modes or national legislation? Are there any overlaps, gaps or inconsistencies, and if so what are the impacts of these?	The link between passenger rights and national transport policy is likely to be weak.
c4	18	In your view, to what extent are the requirements of Regulation 1177/2010 coherent and consistent with other EU interventions/initiatives or legislation, for example in respect of non-discrimination, accessibility, EU consumer policy and competition policy?	
<b>Good practices</b>			
g1		Do you have examples of good practice, guidelines or other guidance, minimum standards, contingency plans available in respect of:	
g1a	a)	Right to get assistance in case of long delay at departure or at connecting points. For example, are there contingency plans for assistance and care in case of massive disruptions to avoid long waiting time at the premises or by phone or online?	No information
g1b	b)	How to avoid offering discriminatory contract conditions, including for PRM access, or any direct or indirect discrimination based on residency of the final customer or on the place of establishment of the carriers, or ticket vendors?	No information
g1c	c)	How to reimburse passengers quickly and with a minimum of administrative burden, when the trip is not carried out as planned?	
g1d	d)	How to fulfill the obligation of rerouting and rebooking effectively and efficiently?	
g1e	e)	How to keep all passengers (including PRM) informed without undue delay?	
g1f	f)	Pre-notification and transmission of information between travel agents, operators, ports and PRM service providers?	No information
g1g	g)	The information about and service quality of assistance for PRMs?	No information
g1k	h)	How to keep passengers, including those, who might have disabilities or who are less IT-literate informed about disruptions in an accurate and timely manner?	
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g1i	i)	Replacement of damaged or lost mobility equipment and how to provide assistance with regard to the passengers' immediate practical needs following such an incident?	No information
g1m	j)	Rapid and effective handling of complaints, especially in terms of procedures and deadlines?	No information
g1n	k)	NEB structures or practices in terms of dealing with complaints, cooperating with other NEBs, monitoring cross-border operators, performing ADR functions, etc.? Good practices to incentivise a full application, to avoid circumvention (if any) and to have an effective, proportionate and persuasive enforcement? Types of sanction regimes that have proven to be good practice in this regard?	No information
g1o	l)	Consumer bodies/authorities and/or dispute resolution (ADR/ODR) practices?	No information
g1p	m)	Addressing the interaction between the Regulation 1177/2010 and the Package Travel Directive (2015/2302)?	No information
g1q	n)	How to quickly and easily establish whether the carrier is responsible for a certain travel disruption or whether it can be exempted from its obligation to pay compensation due to extraordinary circumstances?	The passenger is always the weaker party in relation to the transport company. In principle, therefore, "extraordinary circumstances" cannot be an exception to the passenger's disadvantage.
g1r	o)	Systematic use of IT tools which help to improve the implementation of Passenger Rights? Other cooperation between operators of different modes in multimodal travel?	There is a need for open data. This would allow apps to be developed with passenger oriented information.
g1s	p)	Where carriers offer contract conditions which are more favourable for passengers than the conditions laid down in the Regulations?	No information

g1t	q)	With the application, monitoring or enforcement of passenger rights (including PRM) during the COVID-19 pandemic?	No information
g2	20	Can you provide any other examples of good practice, guidelines or other guidance, minimum standards, contingency plans available, including from non-European countries?	There is a national multi modal passenger rights legislation for short-distance public transport in Sweden.
Other			
o1	21	Do you have any other comments to make regarding the existing European framework on passenger rights for travel by sea or inland waterway? Please specify which market and/or socio-economic developments (if any) since the introduction of the Regulation do not support its application.	It is necessary to secure and develop passenger rights including multi-modal journeys.
o2	22	Do you have any other comments?	

Thank you very much for taking part