

Passenger Package

EPF response – July 2026

On 13 May, the European Commission published its long-awaited “[Passenger Package](#)”: three legislative proposals aimed at improving rail passenger protection, rail ticketing, and multimodal digital mobility services. Together, these proposals seek to make multimodal and, in particular, multi-operator rail travel, easier to plan and book, while also strengthening rail passenger rights throughout the journey.

Since the launch of the Multimodal Digital Mobility Services (MDMS) initiative in 2021, EPF has consistently advocated three key outcomes for passengers. These objectives remain equally relevant to both multimodal and multi-operator rail journeys:

- Passengers should have access to **unbiased, dynamic journey information**, enabling informed choices, both when planning and making their journeys;
- Buying multimodal/ multi-operator tickets should be **easy, affordable and offer protection** in case something goes wrong;
- **Data sharing and readiness to conclude distribution agreements** between operators and MDMS should be the default option, i.e. the norm.¹

Against these objectives, the Passenger Package delivers mixed results. While the multimodal booking proposal falls short of expectations, the rail proposals represent an important step forward. However, key issues remain regarding scope, definitions and implementation, which should be addressed during the legislative process. EPF sets out its main observations and recommendations below.

Protection of passengers with single tickets

Key changes to the existing Rail Passenger Rights Regulation:

- Full passenger rights (reimbursement, re-routing, compensation, assistance) now apply to all multi-operator rail journeys sold under a single ticket.
- The railway undertaking whose delayed, cancelled or early departed service causes a missed connection – under a single ticket – shall be liable for the entire journey.
- Passengers with missed connections must be allowed to continue their journey on the next available service of the same operator.
- Railway operators, ticket vendors and tour operators must not split journeys that could be sold as a single ticket and respect minimum connection times (MCTs).
- If MCTs are not respected, ticket vendors/ tour operators must pay 75% compensation and reimburse either the full ticket price or reasonable re-routing costs incurred.
- Compensation applies to the whole journey, except for journeys over 12 hours sold under separate transport contracts (unless a night train is included).

EPF warmly welcomes this ambitious proposal, which is a major step forward in strengthening rail passenger rights. It addresses a longstanding gap by extending

¹ See EPF's position paper on *Multimodal Digital Mobility Services* (2023), available [here](#). Integrated information and ticketing, together with improved passenger protection, are also identified as key priorities in EPF's *Priorities for EU Action* paper (2024), available [here](#).

protection to passengers travelling across multiple rail operators, reflecting the reality of increasingly interconnected rail travel and passengers' need and expectation that sold connections come with guaranteed protection. However, important questions remain regarding scope and implementation.

The "single transaction" criterion leaves important gaps for passengers using season tickets, travel passes, flexible tickets, or those who need to book parts of a journey separately, a.o. due to diverging booking horizons. EPF recommends replacing it with a "single journey" approach, ensuring that protection follows the passenger's itinerary rather than the way tickets are purchased – or at least a "single platform" approach, allowing more flexibility to modify, cancel or add different legs of the journey at a later stage. Ideally, passenger rights should apply regardless of ticket type, number of transactions, or sales channel, provided minimum connection times are respected.

Existing cooperation mechanisms such as AJC and HOTNAT should be strengthened and made mandatory as a basis for robust re-routing guarantees, ensuring practical solutions and ensuring that rights do not only exist on paper. Passengers should have the right to continue their journey on the next available train in all situations, including those outside the "single ticket" scope, and including on competing operators' services where this enables the fastest onward journey, without additional cost or administrative barriers.

Minimum connection times are a useful basis to determine whether connections are viable and should be offered. MCTs should be transparent, subject to independent oversight, and based on realistic operating conditions. They should take into account factors such as historical delay performance, congestion levels, station layout and complexity, accessibility requirements, transfer distances and transfer types, as well as the consequences of missed connections, including service frequency and whether the missed service is the last train of the day. Passengers should receive clear information on what constitutes a protected connection and, when complying with applicable MCTs, enjoy full passenger rights.

Operators, ticket vendors and intermediaries should have clearly defined responsibilities for providing information, handling complaints and assisting passengers with re-routing. While self-re-routing is a useful fallback, passengers should not be forced to arrange alternative travel on their own during disruptions. Protection should include accessible contact points, non-digital channels, and practical support throughout the disruption.

Rail Ticketing Regulation

Key provisions:

- Data-sharing obligation: Railway undertakings must provide online ticketing service providers with all relevant content (tickets, discounts, real-time data) and conclude agreements on fair, reasonable and non-discriminatory (FRAND) terms.
- Hosting obligation: Major railway ticketing platforms must host rail products from other operators and display available services based on National Access Point data.
- FRAND conditions: Agreements must avoid unfair requirements; remuneration, technical, financial, cybersecurity and data protection conditions must be FRAND.
- Booking horizon: Tickets must be available at least five months before travel when services are included in the working timetable.

EPF strongly supports the objective of enabling passengers to find, compare, combine and purchase multi-operator rail tickets through the channel of their choice. The proposal advances this objective through complementary sharing and hosting obligations. From a passenger perspective, the key requirement is that all rail services across Europe can be booked through a one-stop shop, with passenger protection applying to the entire journey.

EPF particularly welcomes the sharing obligation, which reflects its long-standing position that transport operators – across all modes – should share data and be prepared to negotiate distribution agreements with mobility distribution service providers (MDMS) on fair, reasonable and non-discriminatory (FRAND) terms. The hosting obligation is also a positive step, increasing the visibility of rail services on widely used platforms. Effectiveness in terms of displaying rail alternatives (i.e., without selling tickets) will depend on the availability of comprehensive National Access Point data and has limited relevance if not including information on fares and real-time availability (for which APIs are likely needed).

EPF welcomes the proposed five-month booking horizon but stresses that it must be reliable in practice. Stable timetables are essential, and operators should be prevented from circumventing the rules by gradually adding services to the working timetable, thereby delaying access to protected single tickets and creating different levels of passenger protection depending on when tickets are purchased.

Multimodal Booking Regulation

Key provisions:

- Scope: Applies to significant B2C and B2B Multimodal Digital Mobility Services (MDMS) providing travel information and distributing/ re-linking transport products from multiple operators *within the same mode*. Excludes urban/suburban services, operator distribution channels, search engines and SMEs.
- Commercial agreements: MDMS and operators must cooperate under FRAND conditions, ensuring fair remuneration, no unfair contractual requirements or exclusivity, and protection of commercially sensitive data.
- Neutral display: MDMS must display options neutrally and rank them based on criteria such as price, travel time, emissions, departure time and accessibility. Paid ranking is only allowed if requested by users.
- Data sharing: MDMS must share relevant data with public authorities upon request for mobility management purposes.

Despite its name, the Multimodal Booking Regulation is not truly multimodal, as MDMS are limited to information and distribution of transport products of different operators *within the same mode*. This is a missed opportunity to support modal shift by enabling passengers to compare and book seamless end-to-end multimodal journeys.

The original MDMS initiative aimed to address market barriers, but the proposal falls short of this objective. Unlike the Rail Ticketing Regulation, it does not extend FRAND obligations consistently to platforms *and operators*, despite similar competition concerns, particularly in aviation. EPF therefore recommends extending FRAND data-sharing obligations across all modes, applying them to all operators and MDMS regardless of market share or business model, as foreseen in the Rail Ticketing Regulation. Data sharing and the willingness to conclude distribution agreements should become the default.

EPF supports the neutral display obligation but considers that a return to the idea of mandatory filter options, as proposed in the Multimodal Passenger Mobility Forum's final report, would be beneficial. This would allow passengers to filter options according to criteria such as price, travel time, number of transfers and sustainability, while still enabling MDMS to rank results based on a combination of criteria.

Environmental information will only be meaningful if available for comparison across multiple modes – which is not the case under the current proposal – and if emissions data is consistently available. All transport operators should therefore provide emissions data, or a harmonised methodology should be applied where data is unavailable.