

European Rail Passengers Union

Does it deliver for passengers?

ERPU's feedback on COM(2026) 232 & 233

Freedom of movement and the ability to seamlessly cross borders are fundamental to the European project. There are currently two big hurdles for those who want to choose rail for those cross-border journeys: a lack of easy ticketing and an absence of passenger rights. At the moment finding and purchasing tickets for many journeys can be challenging, requiring visiting multiple websites and platforms. On top of that, passenger rights – like rerouting in the case of a missed connection and delay compensation – are not necessarily guaranteed when your trip involves multiple operators.

As passengers we are glad that the EU is taking up these challenges and we welcome the Commission's proposal as an important step in the right direction. However, we want to make sure that the final legislation truly delivers what passengers need so it will result in growth in rail ridership. It is with this perspective that we provide the following feedback.

Executive summary:

- 1. We strongly support the “sharing obligation” under FRAND terms.**
- 2. We oppose the “single platform” and “single transaction” requirement. Passenger rights must apply to any journey as long as all transfers respect minimum connection times.**
- 3. The final legislation should more clearly address how rights will be realised by passengers at the point of disruption.**

Ticketing – COM(2026) 232

We strongly support the “sharing obligation” under FRAND terms as outlined in Articles 4 and 6.

The current fragmented ticketing landscape is a challenge even for seasoned travellers, let alone for those exploring rail as an alternative to other modes of travel. The crucial mechanism in order to improve the situation for passengers is for there to exist platforms where prices for all route options are available, and that tickets can be purchased on these platforms for the best price. The priority must be what passengers need, not who provides those platforms. Regulation should mandate the conditions necessary for platforms such as these to emerge.

To achieve this, all railway undertakings, regardless of size or ownership, must be required to make available their entire ticketing inventory to third parties that wish to resell rail tickets, and this must be done on fair terms. The commission paid to a reseller must be at least adequate to cover the platform’s operational costs to re-sell the ticket. There must also be no categories of tickets excluded from this obligation, because any exclusions will prevent the development of genuine “book any train” platforms. These do not exist currently, but their creation would be of clear benefit to passengers.

Passenger rights – COM(2026) 233

We support the underlying impulse to extend rights to multi-operator journeys. However, we find the proposed implementation severely flawed.

We oppose the “single platform” and “single transaction” requirement. Passenger rights must apply to any journey as long as all transfers respect minimum connection times.

We see three main shortcomings with the proposal’s current approach:

1. Not all journeys will be available with rights. The rights now associated with the “single ticket” will only be available to passengers once the entire infrastructure and required coordination to sell such tickets are in place. It is clear that this will take many years. Even then, there is no guarantee that all journeys will ever be available as a “single ticket”. This is especially likely to be a problem for itineraries that cross more than one border (which is not uncommon in Europe) and those connecting to smaller destinations with regional services. Fundamentally, passengers shouldn’t have to hope that there exists – and that they are able to find – a ticketing platform that happens to sell all of the tickets they need. Our rights shouldn’t be dependent on how tickets are sold or from which platform, including in-person at a ticket office that may only sell part of the journey.

2. Even journeys that can be made with rights will come with extra hassle and a price premium. The proposal does not envision a way to combine travel passes, such as the popular Deutschlandticket or Klimaticket, with onward connections into a “single ticket”. Passengers who use discount cards or loyalty programs will face similar problems. This means that in order to travel with full rights these passengers will

suddenly have the extra burden of needing to purchase an additional, potentially more expensive, ticket. The current proposal risks undermining important public transit programs and offerings, and unfairly penalising those that use them.

3. The “single ticket” robs passengers of needed flexibility. The proposed rules won't cover those who need the flexibility of not locking in their whole trip at once. For example, mismatched booking horizons might make it necessary to book a seat on a high demand train before tickets for other legs of the journey are available. The proposed legislation attempts to address this with a five month minimum booking horizon, but we are very sceptical that it will succeed in practice. There are too many gaps and exceptions for trains to be added to the timetable at less than five months notice, leaving passengers unable to successfully purchase a “single ticket”. Or, if one part of a traveller's journey changes they would then have to repurchase the entire ticket chain in order to still have rights. Ease and flexibility is one of the advantages of choosing the train, and should not be artificially restrained.

What passengers need is the guarantee that when they have planned a reasonable journey they will be able to get to their destination, even in the case of disruptions. The current proposal already uses minimum connection times as the basis for defining what is a reasonable journey, and the new TEL TSI regulation already creates a framework for minimum connection times to be set neutrally and made publicly available.

This guarantee would align travel rights with how passengers most naturally and intuitively expect their rights to function: Having arrived delayed and therefore missed your connection you show your tickets that demonstrate that you should have been able to make that connection. The operator or station manager on the spot should then

help put you on the next best train, or arrange a hotel for the night as appropriate. It also avoids the absurd situation where two passengers travelling on the same itinerary with the same tickets seek assistance and one of them has full rights, because they knew how to purchase their tickets the “correct” way, and the other does not have those same rights because they did not.

We know this approach can work because it already partially does. Most railway operator have limited voluntary agreements (e.g. HOTNAT and AJC) that work exactly like this. They don’t rely on how or where you bought your ticket, but just on showing that you missed a connection you would have otherwise have been able to make. We find these agreements currently insufficient because they are voluntary, inconsistently applied, and not universal.

The result for passengers who go online and buy all of their tickets at once from a single source would be the same under the Commission’s current proposal and our suggested amendment. In the case of the former, the ticketing platform would make sure all minimum connection times are respected when creating an itinerary. In the inevitable and unavoidable cases where it isn’t desirable or, importantly, even possible to purchase tickets in a single transaction from a single platform passengers would still be able travel with the same rights and peace of mind as everyone else, by proving they are travelling on a valid itinerary.

Rights in practice– the passenger experience

Rights are only as useful as a passenger's ability to exercise them in practice. **To this end, the final legislation should more clearly address how rights will be realised by passengers at the point of disruption.**

Under the current proposal a “single ticket” is to be composed of individual tickets connected only by how they were purchased. Furthermore, railway undertakings will have no knowledge of the other legs of a passenger's journey except and until a passenger petitions for assistance in the case of disruption. Given this, it is unclear to us what passengers will hold that shows they are entitled to rights or how they will be expected to demonstrate this. No matter the framework for rights ultimately adopted, this must always be transparent, simple, and without undue burden for the passenger.

We would also like more clarity on from whom passengers can expect assistance. Passengers should be able to proceed directly to the local station manager or operator of their connecting train when in trouble to arrange a solution for rerouting or, if necessary, accommodation. The question of who is ultimately liable for the costs should be settled between the railway undertakings, and not affect the passenger.

We urge the co-legislators keep the experience of passengers front of mind. This should be the guiding principle when it comes to making ticketing easier, the framework under which rights are to be granted, and also for **how those rights will be exercised in practice by a stressed traveller stranded on a distant train platform hoping to get to their destination.**

We would be happy to answer any question or provide any further insight from the perspective of passengers that may be helpful to the co-legislators as they move forward.