

European Rail Passengers Union



Guaranteed rights & easier ticketing

A passenger-centric approach to better cross-border rail

Understanding passengers' challenges

Freedom of movement is fundamental to the European project. Being able to cross borders promotes commerce and brings people together.¹ Furthermore, trains should be the preferred choice for most cross-border trips. Travelling by rail is significantly more sustainable than other options and key to meeting pressing climate goals.² We also know that many people want to be able to take the train for these journeys.³

However, as President of the European Commission Ursula von der Leyen noted in her political guidelines, “Cross-border train travel is still too difficult for many citizens”.⁴ We as passengers know this better than anyone. Our members face these challenges everyday. Cross-border rail often requires relying on multiple railway undertakings (RUs). Navigating the differences and disconnects between them places a large burden on passengers, to the point that many give up entirely on using rail for their cross-border journeys and are forced to opt for less social and environmentally friendly alternatives. To change that taking the train needs to become easy, convenient, and headache free. That means addressing two of the biggest current pain points for passengers: the gap in passenger rights and the fractured ticketing landscape. To solve these transnational problems we need overarching regulation. We welcome the EU’s efforts to implement these much needed reforms.

1. Medeiros et al., “Boosting Cross-Border Regions Through Better Cross-Border Transport Services. The European Case.”

2. Prussi and Lonza, “Passenger Aviation and High Speed Rail”; Avogadro et al., “Replacing Short-Medium Haul Intra-European Flights with High-Speed Rail”; UK Department for Business, Energy & Industrial Strategy, “Greenhouse Gas Reporting: Conversion Factors 2025.”

3. European Federation for Transport and Environment, “Booking Headache Deters Almost Two in Three Long-Distance Rail...”; Polling Europe, *EU Survey: Perception of High-Speed Rail in Europe*.

4. *Europe’s Choice: Political Guidelines For The Next European Commission 2024–2029*.

This position paper applies to the legislative package to be proposed by the European Commission in spring 2026: the revision of the Regulation on Rail Passengers' Rights, the Single Digital Booking and Ticketing Regulation (SDBTR) for rail, and the Regulation on Multimodal Digital Mobility Services (MDMS). We start with two basic premises:

Passenger rights must be guaranteed however many railway undertakings are involved in a journey.

This guarantee is necessary to make choosing rail a viable option for cross-border journeys. Our rights should not stop at the border or fall through the gaps of transferring from one operator⁵ to another. As passengers, having planned a reasonable journey, we expect a smooth continuous trip and to be taken care of when things go wrong.

To make it easier to plan a cross-border rail journey it needs to be easier to find and purchase tickets for the best price.

Making it easier to find and purchase cross-border rail tickets will help passengers choose the train for these journeys, rather than other more environmentally damaging alternatives. More passengers on these trains will mean more income for railway undertakings, resulting in them providing more services, and creating a positive cycle for modal shift to rail.

5. *Railway undertaking* and *railway operator* are used synonymously and interchangeably in this document.

Ensuring passengers' rights

Passengers need:

Full rights to apply to any journey as long as all transfers respect minimum connection times, regardless of the number or nature of the tickets and transactions.

Minimum connection times to be set neutrally and to be made publicly available.

As passengers we expect that the same rights afforded domestically when travelling with a single railway undertaking, as afforded by EU law⁶, will apply to all cross border journeys regardless of the number or nature of RUs involved.

In practice this means that on the spot, when their journey is disrupted, a passenger should be able to present their original travel chain to the operator or station manager, and must then be entitled to continue on the next available most reasonable route to their destination, regardless of operator. That includes RUs and routes other than those for which the passenger had originally purchased their tickets. All original conditions – such as class, luggage allowances, and accommodation – should, of course, be respected. In the case that a passenger is stranded and

6. EU, Regulation (EU) 2021/782 of 29 April 2021

needs overnight accommodation this must be provided by the operator or station manager on the spot at no cost to the passenger. All costs incurred in assisting passengers could be claimed back, by the operator or station manager, from whichever entity was responsible for the original disruption. This way passengers are never left out of pocket, and the cost is ultimately borne by the liable party.

The extension of these basic rights to cross border journeys should be achieved in the simplest, most direct, way and without counter productively placing additional burdens on passengers. From the passenger's perspective that means they should apply seamlessly to any reasonable journey. We see the plainest understanding of a "reasonable journey" as one that respects minimum connection times. That is, a passenger could have two or more tickets for their journey, but providing binding minimum connection times were respected at each station where a passenger changes train, their rights for the entire trip would be guaranteed. This would apply regardless of how or when the individual tickets were purchased.

Minimum connection times need to be published openly and transparently, giving both passengers and ticket selling platforms security, and should be set in an operator-neutral way, as foreseen by the recent TEL TSI regulation⁷. The most neutral solution in a liberalised railway is for infrastructure managers to set these times. Times should always be set to the very minimum necessary, and there must be an appeals process for cases where this is not respected.

7. Commission Implementing Regulation (EU) 2026/253 of 6 February 2026

We see this approach as a simpler way to an adequate solution than the alternatives. While relying on the framework of “through-tickets” or “single tickets” is closer to the result passengers need than the current situation, it will always be insufficient. First, mandating that all railway undertakings work together to the extent necessary to allow the creation of such tickets is a needlessly complicated and costly means to solve the problem and would inevitably delay delivering the rights passengers need into the far too distant future. Second, there will always be journeys that remain impossible to purchase in a single transaction, let alone as a through-ticket, because of travel passes, discount cards, and mismatched booking horizons. If a passenger has a regional pass (e.g. Deutschlandticket, Klimaticket) for part of their trip, and a regular ticket for another part of their trip, they should not be denied passenger rights. Likewise if a reduction card a passenger holds is not accepted by a booking platform, a passenger must be entitled to book that leg where their card is accepted. And lastly, there is no benefit to this approach, only the downside of increased technical complexity. There is no need for railway undertakings to know about a passenger’s entire journey before that journey starts, when what ultimately matters is that the set minimum connection times are respected.

We also wish to emphasise that we view existing industry initiatives such as Agreement on Journey Continuation (AJC) and Railteam HOTNAT, even if they were extended to more operators, as inadequate. As passengers we are only all too familiar with their shortcomings. There is no way to legally enforce their provisions, and accommodation is not covered. Passengers need binding EU regulation to feel secure in choosing rail for their cross-border journeys.

Facilitating easier ticketing

Passengers need:

The obligation on all railway undertakings to make their full inventory available for resale under fair terms.

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 be platforms where prices for all route options are available, and that tickets can be purchased on these platforms for the best price. We are neutral as to who should run these platforms. They could be run by railway undertakings themselves (either state or privately owned), or by third parties, or by public authorities. The priority is what passengers need, not who provides those platforms. Regulation should mandate the conditions necessary for platforms like these to emerge.

To achieve this, all railway undertakings, regardless of size or ownership, should 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 terms⁸. 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

8. For example, using the fair, reasonable, and non-discriminatory (FRAND) framework, cf. Beria, P., and C. Cambini, "The Economics of the Single-Ticketing Regulation in Europe"

any exclusions will prevent the development of genuine “book any train” platforms, something that does not exist currently, but the creation of which would be of clear benefit to passengers. And of course, these provisions do not mean passengers themselves need to book online. Someone in a telephone call centre, or at a ticket office in a station, would likewise have access to this data. With the full inventory available under fair terms, any platform or a diversity of platforms can find the best way to serve passengers’ needs.

With our focus on European and cross-border aspects of rail travel, we see little cross-border benefit in one of the other likely provisions of SDBTR, namely forcing incumbent monopoly or quasi monopoly rail booking platforms to sell all trains (regardless of operator) in their national territory. This may make sense within one member state, but the cross-border benefit is not clear. If a passenger is searching for tickets from country A to country B, but can route via country C or country D, this provision would not help them as all trains in country C and country D might still be on separate platforms. As with the question of passenger rights, we are interested in the simplest, most direct, path to improving passengers’ experiences so that it will be easier to choose rail for more cross-border journeys.

Conclusion

Improving cross-border rail is an opportunity for the EU to shine. Guaranteeing passenger rights and facilitating easier ticketing would promote EU integration and further sustainability goals by reducing longstanding barriers that make cross-border travel unnecessarily burdensome and insecure. These reforms, if done correctly, would deliver better service for citizens, advance green ambitions, and support economic growth and EU businesses.

The European Rail Passengers Union is a direct membership organisation representing the voices and interests of passengers. We believe that better cross-border rail is key to a more connected and sustainable Europe.

For more information, please visit <https://erpu.eu>.

Spring 2026

References:

- Avogadro, Nicolò, Mattia Cattaneo, Stefano Paleari, and Renato Redondi. "Replacing Short-Medium Haul Intra-European Flights with High-Speed Rail: Impact on CO2 Emissions and Regional Accessibility." *Transport Policy* 114 (December 1, 2021): 25–39. doi:10.1016/j.tranpol.2021.08.014.
- Beria, P., and C. Cambini. 2026. The Economics of the Single-Ticketing Regulation in Europe. https://re.public.polimi.it/bitstream/11311/1308705/1/CERRE_The-Economics-of-the-Single-Ticketing-Regulation-in-Europe.pdf.
- Commission Implementing Regulation (EU) 2026/253 of 6 February 2026 on a technical specification relating to the telematics subsystem of the rail system in the European Union for interoperability of data sharing in rail transport (TEL TSI) and repealing Regulations (EU) No 454/2011 (TAP TSI) and (EU) No 1305/2014 (TAF TSI) (2026). http://data.europa.eu/eli/reg_impl/2026/253/oj.
- EU. Regulation (EU) 2021/782 of the European Parliament and of the Council of 29 April 2021 on rail passengers' rights and obligations (recast) (Text with EEA relevance), 172 OJ L § (2021). <http://data.europa.eu/eli/reg/2021/782/oj>"><http://data.europa.eu/eli/reg/2021/782/oj>
- European Federation for Transport and Environment. "Booking Headache Deters Almost Two in Three Long-Distance Rail..." October 22, 2025. <https://www.transportenvironment.org/articles/booking-headache-deters-almost-two-in-three-long-distance-rail-travellers-new-poll-finds>.
- Medeiros, Eduardo, Ricardo Ferreira, Pascal Boijmans, Nathalie Verschelde, Robert Spisiak, Patrick Skonieczki, Jakob Dietachmair, et al. "Boosting Cross-Border Regions Through Better Cross-Border Transport Services. The European Case." *Case Studies on Transport Policy* 9, no. 1 (March 1, 2021): 291–301. doi:10.1016/j.cstp.2021.01.006.
- Polling Europe. EU Survey: Perception of High-Speed Rail in Europe, May 2025. <https://www.cer.be/cer-facts-figures/eu-survey-perception-of-high-speed-rail-in-europe>.
- Prussi, Matteo, and Laura Lonza. "Passenger Aviation and High Speed Rail: A Comparison of Emissions Profiles on Selected European Routes." *Journal of Advanced Transportation* 2018, no. 1 (2018): 6205714. doi:10.1155/2018/6205714. UK Department for Business, Energy & Industrial Strategy. "Greenhouse Gas Reporting: Conversion Factors 2025," June 10, 2025. <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2025>.
- UK Department for Business, Energy & Industrial Strategy. "Greenhouse Gas Reporting: Conversion Factors 2025," June 10, 2025. <https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2025>.
- von der Leyen, Ursula. Europe's Choice: Political Guidelines For The Next European Commission 2024–2029. Strasbourg, July 18, 2024. https://commission.europa.eu/document/download/e6cd4328-673c-4e7a-8683-f63ffb2cf648_en?filename=Political%20Guidelines%202024-2029_EN.pdf.

Cover photo: kallerna https://commons.wikimedia.org/wiki/File:Lille-Flandres_station_3.jpg CC BY-SA 4.0