AK EUROPA

Position Paper
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Transport & Environment



Passenger Package: One journey, one ticket, full rights

COM(2026) 231
COM(2026) 232
COM(2026) 233

Executive summary

Key points at a glance

As part of the Passenger Package, the European Commission has put forward three regulation proposals, which are designed to simplify cross-border rail travel through seamless bookings across different providers and to legally safeguard comprehensive passenger rights in the rail sector throughout the entire travel chain:

- **COM (2026) 231** (Proposal for a **Regulation on multimodal booking** and repealing Regulation (EC) No 80/2009) creates a legal framework for cross-provider, neutral platforms that enable users to search for and book multiple modes of transport.
- **COM (2026) 232** (Proposal for a **Regulation on rail ticketing**) defines how operators and platforms must issue and share rail tickets.
- **COM (2026) 233** (Proposal for a **Regulation** amending Regulation (EU) 2021/782 as regards the **protection of passengers with single tickets**) specifically extends existing EU rail passenger rights to combined 'through tickets' (single tickets) covering services operated by multiple operators.

Key advances under the Passenger Package:

AK generally welcomes the European Commission's 'One journey, one ticket, full rights' initiative as an important first milestone towards strengthening rail passengers' rights and promoting environmentally friendly mobility.

This corresponds in many respects to AK's long-standing calls for a simple and comprehensive booking system offering comprehensive legal protection. The convenient single-ticket system saves time and aims to guarantee compensation for delays or cancellations throughout the journey. The obligation to display offers on digital platforms in a non-discriminatory manner also makes it easier for passengers to compare environmentally friendly and affordable travel options.

However, as the last 30 years have shown, obligations are necessary, as voluntary cooperation has not achieved the desired results.

Nevertheless, AK has a number of **suggestions for improvement:**

- **Clear and consistent liability rules:** Passengers must be able to clearly identify the company responsible for compensation and claims. One option would be to introduce a rule whereby the company that sold the ticket bears primary responsibility.
- **Legal protection regardless of ticket type:** All passengers – whether they are travelling on single tickets, combined tickets for a single mode of transport, or using a multimodal journey involving different modes of transport – must be fully covered.
- **Integration of local transport:** Local transport should be better integrated, particularly with regard to ticket availability, in order to cover the 'first and last mile' of each journey.
- **Strengthening national arbitration boards:** Effective enforcement mechanisms are essential to ensure that passengers can exercise their rights without encountering bureaucratic obstacles.

AK's position

Key provisions of the draft

In recent years, AK has consistently called for uniform, high-quality, comparable and transparent passenger rights across all modes of transport in Europe, as well as pointing out that urgent action is required regarding combined tickets for through journeys. On the one hand, cross-border travel within the EU – especially by rail or multiple transport modes – can be highly complex for passengers and, where clear options are unavailable, sometimes impossible. On the other hand, comprehensive passenger rights protection applies only in exceptional cases. Changing trains is even less attractive because passengers who miss a connection usually have to bear the cost of replacement tickets and additional expenses, such as overnight accommodation themselves. This unsatisfactory situation for travellers was also confirmed by a 2024 Eurobarometer survey of 26,000 EU citizens. The Commission itself has already acknowledged that Regulation (EU) 2021/782 on rail passengers' rights and obligations provides only very limited protection in this area, and that such restrictions significantly reduce the appeal of rail travel compared to other modes of transport.

Criticism of the current proposal

Notwithstanding the progress mentioned at the outset, AK argues that the package of measures falls short of several fundamental requirements:

Rail travel from a passenger perspective

Various approaches are needed to make rail travel more attractive to passengers. As past experience has shown, market liberalisation alone is not the answer (see the example of the UK). Instead, to encourage travellers to choose rail requires comprehensive measures, such as adequate and functioning infrastructure, cost transparency across different transport modes, affordable and readily available tickets, plus a high-quality service.

Lack of transparency

Vague terms such as 'fair', 'reasonable' or 'appropriate', used in the proposals, create legal uncertainty and, in practice, make it difficult for passengers to enforce their rights. They are open to interpretation and require clarification. In many cases, a court ruling will be necessary.

Complexity

The proposal's many layers of exceptions require expert knowledge instead of making passengers' rights easy to understand and exercise. The wording must therefore be unambiguous and clear to both experts and passengers without specific prior knowledge, indicating which trips are covered and the conditions that apply. In this context, numerous exceptions must be reconsidered to reduce complexity and avoid disappointing passengers' expectations raised by the slogan 'one journey, one ticket, full rights'.

Lack of clear liability rules

From the passenger's perspective, it must be clear which company is liable to the passenger (for example, the company that sold the ticket). Instead of naming a clear point of contact, under the current proposal passengers must go to great lengths to find out - if they manage at all - to determine whom to claim from. This is despite the fact that it is far easier for companies to settle their claims for recourse amongst themselves than it is for passengers to resolve the issue of liability under the current proposal. The companies concerned already cooperate under contracts that can also define the terms of recourse. Furthermore, unlike most passengers, companies are familiar with legal matters and have the necessary staff available to resolve these issues.

Promises at risk of being broken

Furthermore, the slogan 'One journey, one ticket, full rights' is already being used in advertising, creating an expectation that passengers will be granted their full rights in all circumstances when travelling in this way. However, as numerous exceptions have been made, it is to be expected that the European Commission's idea – which is sound in principle – will lead to frustra-

tion amongst passengers. This is due to the system being too complicated and, in some cases, incomprehensible, for example if it transpires that, because of these exceptions, full rights do not apply after all.

Unequal treatment across transport modes

Compared to air travel, rail still has a long way to go. Although the package aims to make affordable rail tickets easier to obtain, with regard to compensation claims, rail passengers will remain disadvantaged compared to air passengers.

In light of these concerns, AK calls for simple, uniform passenger protection rules, backed by effective enforcement, to make long-distance and connecting journeys universally more attractive to all passengers without exception.

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About us

The Austrian Federal Chamber of Labour (AK) is by law representing the interests of about 4 million employees and consumers in Austria. It acts for the interests of its members in fields of social-, educational-, economical-, and consumer issues both on the national and on the EU-level in Brussels. Furthermore, the Austrian Federal Chamber of Labour is a part of the Austrian social partnership. The Austrian Federal Chamber of Labour is registered at the EU Transparency Register under the number 23869471911-54.

The main objectives of the 1991 established AK EUROPA Office in Brussels are the representation of AK vis-à-vis the European Institutions and interest groups, the monitoring of EU policies and to transfer relevant Information from Brussels to Austria, as well as to lobby the in Austria developed expertise and positions of the Austrian Federal Chamber of Labour in Brussels.