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Modernising the EU's rail ticketing regulation

How to streamline passenger rail travel across Europe

T&E

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Foreword by the Youth on Track Coalition

In the midst of an extreme climate crisis, young people are faced with dilemmas whenever we travel long distances for holiday, work or university. Despite being the most climate conscious of generations, it is often difficult for us to avoid flying when the greener alternatives are so inaccessible to us. The barriers that young people face when considering travelling by rail in the EU are huge: ranging from high prices, insecure passenger rights and highly complex ticketing.

It shouldn't be so hard to book a ticket in one place from the beginning to the end of your journey. A T&E Commissioned YouGov survey showed 61% of long distance rail passengers have at least once avoided journeys because the booking process is perceived as a hassle. University of Applied Sciences St. Pölten found that often participants got stuck booking international train tickets, spending up to 60 minutes booking. In comparison on average it took people 70% longer than booking a flight. The same studies found that booking international rail journeys fails ten times more often than booking a flight, making it arguably unsurprising that passengers are tempted by more convenient travel by plane. Considering that planes emit about five times more $C0_2e$ per passenger kilometer than trains on average, this barrier to low carbon travel reflects a failure in EU policy which urgently needs to be resolved in the EU Single Ticketing Package.

What makes matters worse, is that without changing ticketing regulation platforms will continue failing to show all available journeys including cheaper ticket offers. That means that cash strapped young people aren't necessarily seeing the cheapest train tickets or buying the cheapest tickets, which distorts access to affordable tickets and can make train travel prohibitively expensive.

The reality is that the current booking system is stuck in the stone age for passengers. Operators have stood in the way of progress, now we need EU regulation to maximise rail travel. Now the responsibility lies squarely with EU decision makers to make things right. It's time to put passengers first and reduce the EU's transport emissions with an ambitious Single Ticketing Package.

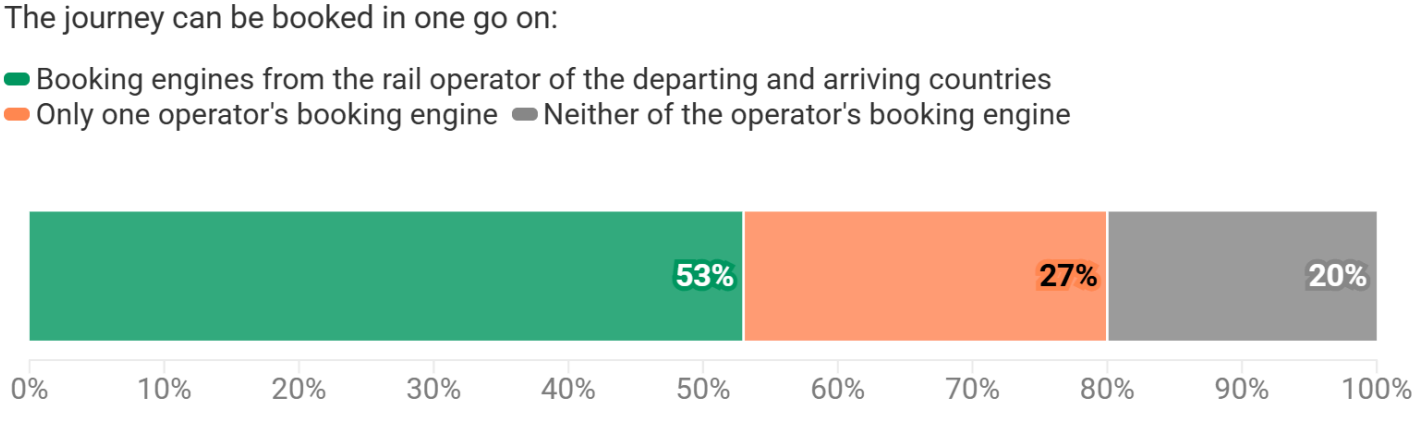
Executive summary

In this report we investigate the rail equivalent journeys to routes among the most heavily frequented by aviation in the EU. Our results highlight the current weaknesses of rail booking in Europe that require urgent attention in the upcoming Single Ticketing Package. The upcoming EU Single Ticketing package should mandate commercial negotiations between rail operators and booking platforms to ensure tickets are displayed and sold across platforms under fair, reasonable, and non-discriminatory terms so that passengers can **buy a single train ticket from the beginning to the end of their journey across Europe with full passenger rights**.

- Most passengers rely on booking platforms from their local incumbent operators to book rail tickets. Yet, when looking at the rail equivalent to the 30 most busiest aviation routes in Europe, **20% of the international routes we studied cannot be booked in one go from major rail companies booking platforms**, even though these routes are frequented by thousands of flights, emitting thousands of tonnes of CO_2 every year. **The mismatch is striking, and highlights a major shortfall in rail competitiveness.**
- Booking possibilities from incumbent rail operator's booking platforms fall short, especially for longer distances: by increasing the geographical range of our analysis, we observe that **more than half of the journeys above 900 km studied are unbookable in a single booking from the beginning to the end of a journey between EU countries.**
- Independent platforms provide more cross-border options, with 77% of journeys above 900 km possible to book a whole journey in one single booking**.** Yet, prices between different platforms greatly vary. **T&E's case studies in this report show prices up to six times more expensive on independent booking platforms than rail operators.**
- **On more than half of the routes analysed, operators do not display all available journeys including competitors' tickets.** This practice not only **prevents passengers from easily comparing and booking the most suitable services** on the same route, but also keeps them unaware of the very existence of these alternatives, even though they may be cheaper than those offered by incumbent operators.

Rail operators fail to provide sufficient booking options on half of the EU's busiest aviation routes

Available rail booking possibilities for the EU's 30 busiest aviation routes under 1500km



Source: T&E • Research performed between August and November 2025, on incumbent operator's booking engines from the departing and arriving countries of the routes studied

Introduction

What is the Single Ticketing Package?

The Single Ticketing Package includes:

1. *The Multimodal Digital Mobility Services Regulation (MDMS),*
2. *Single Digital Booking and Ticketing Regulation (SDBTR)*
3. *and the revision of the Rail Passenger Rights Regulation (RPRR)*

This package provides a crucial opportunity to streamline and improve passenger's booking experience of European railways tickets, enabling people all over the EU to choose climate friendly transport with full passenger rights. The MDMS file regulates tickets that platforms sell and display for rail, air, sea, and road transport that is long-distance, medium-distance and regional. The SDBTR regulates rail operators sharing ticket data for long-distance, medium-distance, regional, excluding urban and metropolitan services.

This has the potential to improve and introduce:

- The *Multimodal Digital Mobility Services Regulation* file may mandate major booking platforms, including third party platforms such as Trainline and incumbent operators booking platforms, such as SNCF Connect or DB Navi, to show all existing train connections in their geographical scope. This could enable passengers to view all available tickets, including the cheapest prices available.

- The *Multimodal Digital Mobility Services Regulation* file could introduce an anticipated requirement for all platforms including air, rail, bus and ferry tickets to disclose the greenhouse gas (GHG) emissions associated with their journey at the point of booking their ticket. In the European Commission Eurobarometer on MDMS published in March 2025, three in four Europeans said climate impact was important when planning a regional or long-distance journey.

- The *Single Digital Booking and Ticketing Regulation* file could mandate rail companies to share their ticket data with all platforms in order to create a through or combined ticket for passengers for their entire international rail journey. Progress on MDMS and SDBTR could significantly ease passengers' experience of booking international rail travel on one website, and increase the visibility of existing connections for passengers, including extras such as bicycle spaces. This file could also encourage operators to share their cancellation and delay data, improving passenger access to real-time journey information.

- The *Rail Passenger Rights Regulation* could improve passenger rights and enshrine the existing CER Agreement of Journey Continuation (AJC) supplied by some operators into law. This could create a "hop in the next train" passenger right between all existing rail operators when you missed your connecting train in the event of a delay, and pay for assistance covering food and accommodation should you have to stay overnight or face

long delays as a result of train delays or cancellations when passengers are travelling using connections between different rail operators. This could go above the limited scope of the AJC by applying also to domestic only connections and not exclusively to cross-border journeys.

What is the mandate of the EU Single Ticketing package?

President Von Der Leyen's 2024 political guidelines

"To achieve our climate objectives, we also need to make it easier for people to shift to more sustainable options. This is notably the case with mobility. Cross-border train travel is still too difficult for many citizens. People should be able to use open booking systems to purchase trans-European journeys with several providers, without losing their right to reimbursement or compensatory travel.

To this end we will propose a Single Digital Booking and Ticketing Regulation, to ensure that Europeans can buy one single ticket on one single platform and get passengers' rights for their whole trip."

Why is this important now?

We are awaiting a proposal on three crucial files under the Single Ticketing Package from the EU Commission imminently which will then be scrutinised by the EU's co-legislators in the coming months. We urge decision makers to reflect on the findings of our study, and agree to an ambitious Single Ticketing package that prioritises passengers and the reduction of the EU's transport emissions which remains the only economic sector where emissions are still above 1990 levels.

Aim of the study

In this study we analysed how easy it is for passengers to book rail journeys in the EU, and the impact of not regulating rail operators and third party's ticketing practices on passenger experience and access to the most affordable train tickets available. To do so, we evaluated rail journeys equivalent to the busiest aviation routes in Europe. This rail vs air journeys comparison allows us to challenge rail booking options with another popular travel mode for long distance in Europe.

We performed our analysis in two steps. Firstly we targeted the most frequented aviation routes by examining the 30 busiest international aviation routes in the EU, for which rail equivalent journeys are below 1500 km (more information is available in the methodological section). On these routes, we assessed some of the difficulties passengers face from the very early stages of their journey: booking tickets. We investigated the possibility of booking a full journey in one go from the websites of incumbent rail operators (see section 1.1).

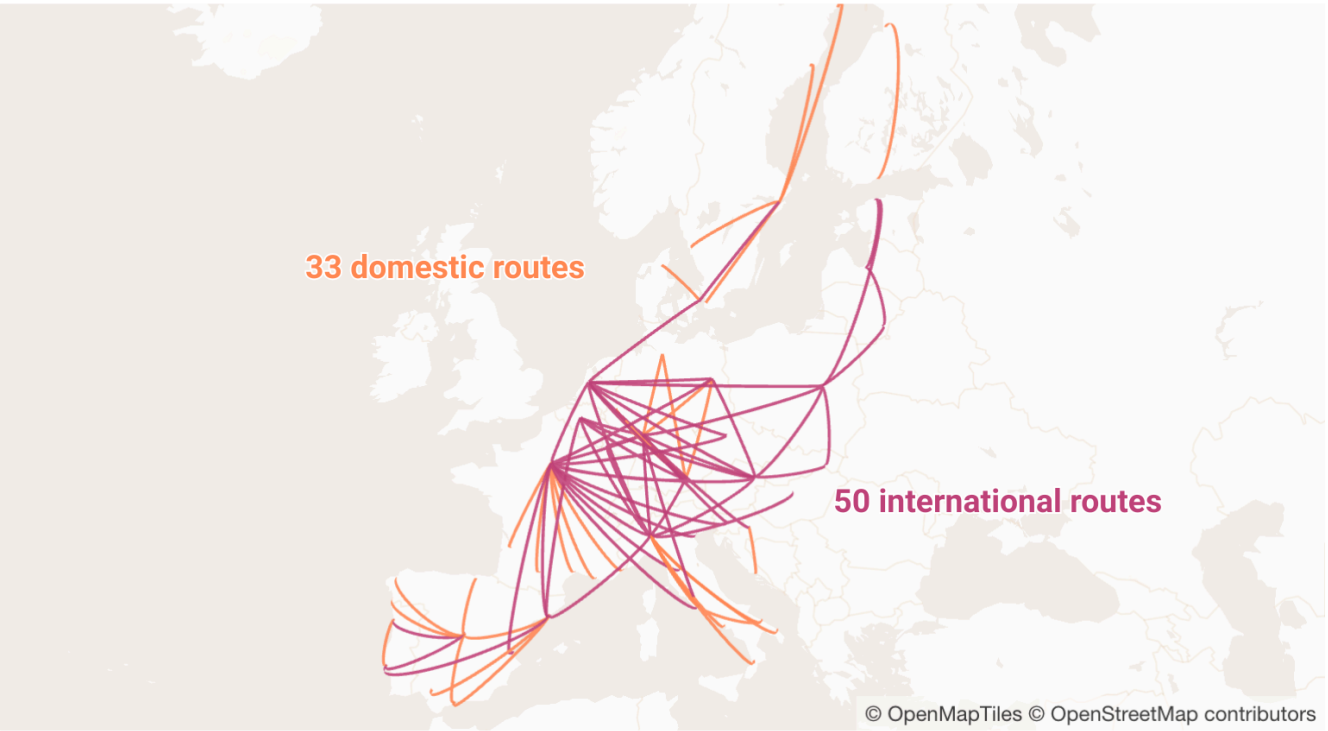
Secondly, we extended the geographical coverage of our analysis and completed these initial 30 routes with a selection of 53 routes, domestic and international, among the most heavily frequented by aviation in the EU, and all below 1500 km by rail (more information regarding the selection process available in the methodological section). Those 83 routes include 33 domestic and 50 international connections, and are covering 21 Member States (see the map below). For each route, we also investigated the possibility of booking a full journey in one go from the websites of incumbent rail operators (see section 1.1), and from four different independent booking platforms (see section 1.2). Furthermore, in cases of competition between operators on a same route, we observed how incumbent operators were showing, or selling their competitors services (see section 2.).

This study does not aim to indicate how many passengers give up on booking rail journeys, or whether they defer to flying instead and their reasons for doing so. But we do outline the possibilities of booking rail tickets, and aviation emissions linked to routes with limited or complex booking options. We are not covering passenger rights legislation in this study, but we will release a further publication on this issue in the coming months.

Geographical coverage of the study

Routes studied are covering 21 Member States

International journeys Domestic journeys



Source: T&E

Overview of long-distance rail booking in the EU

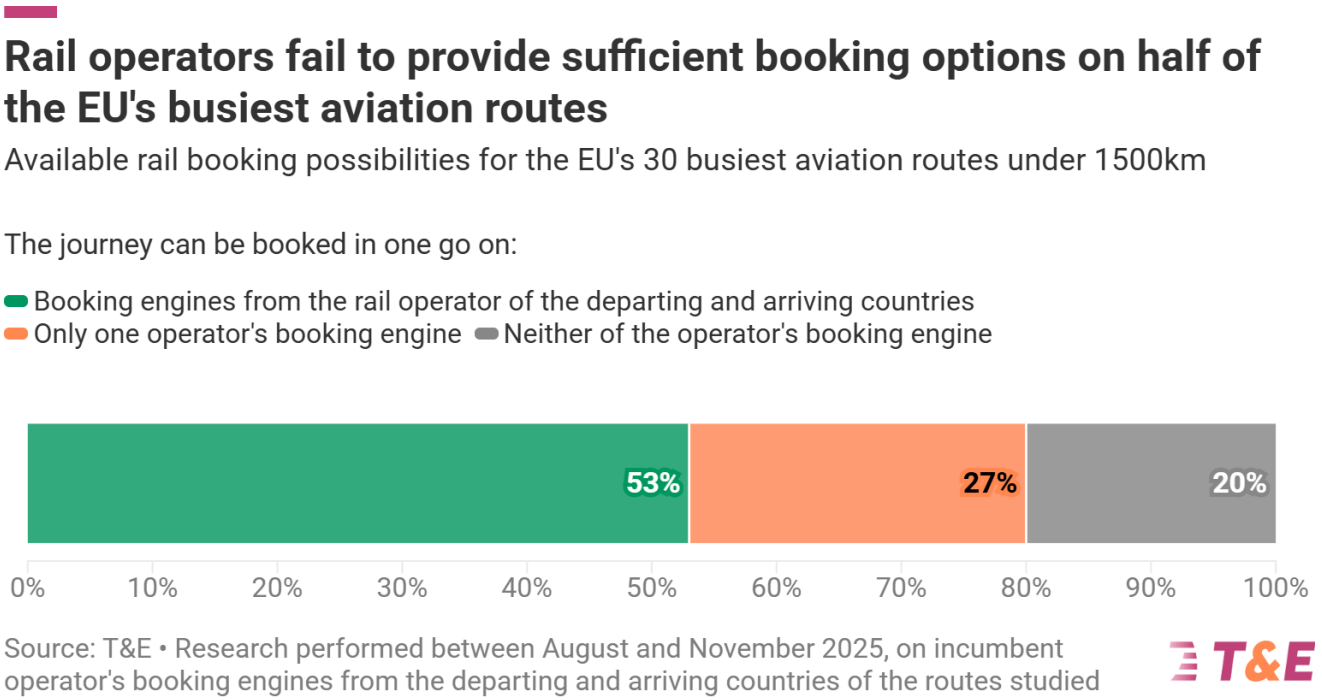
1. Rail ticket booking possibilities

1.1 Booking from incumbent operators

A focus on the rail equivalent to the top 30 busiest international aviation routes in the EU

The first part of our analysis focuses on the 30 busiest international aviation routes in the EU, that can be reached by international rail, with a journey under 1500 km. We investigated the possibility of booking a rail journey, in one go, between the departing and arriving cities for these 30 routes. To do so, we tested incumbent operators' booking engines from the departing and from the arriving countries. So, for instance, for a journey between Milan and Paris, we tested the possibility to book a journey in one go from Trenitalia's booking engine, the Italian incumbent operator, and from SNCF connect, the booking engine from French incumbent operator SNCF.

We observed that for **six of the routes (20%) it was impossible to book** a full journey in one go from any of the vertically integrated booking engines tested. For **another quarter of the routes (27%) it was possible to book journeys from only one out of two of the booking engines tested**.



Increasing geographical coverage to better capture the overview of rail booking in the EU

The second step of our analysis is covering both domestic and international routes from the top 100 busiest aviation routes, as well as routes departing from Eastern Member States that were not represented in this top 100, to increase our geographic coverage (see the methodological section for more details). We investigated routes that can be reached by international rail, with a journey length below 1500 km. As previously, we investigated the possibility of booking a rail

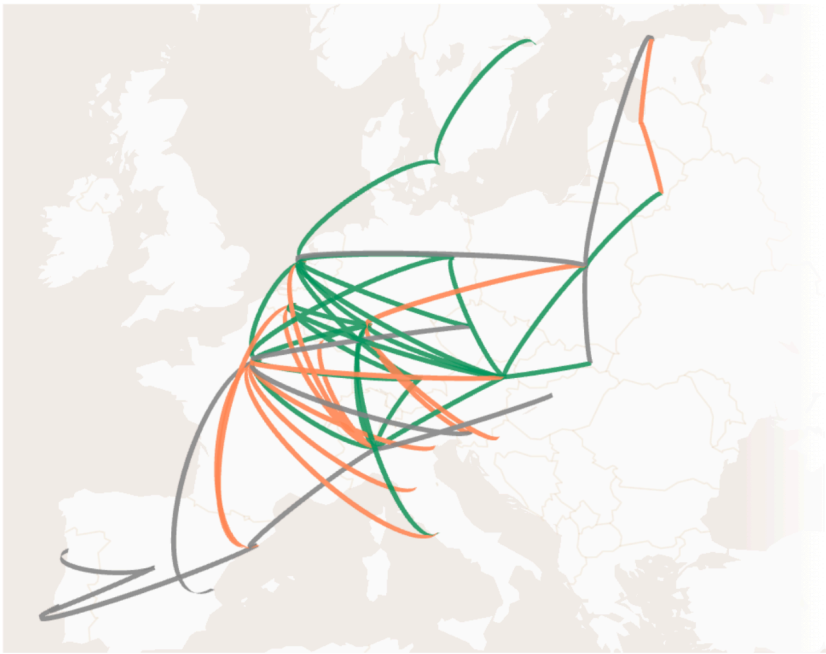
journey, in one go, between the departing and arriving cities from the routes studied from incumbent operators' booking engines from the departing and from the arriving countries.

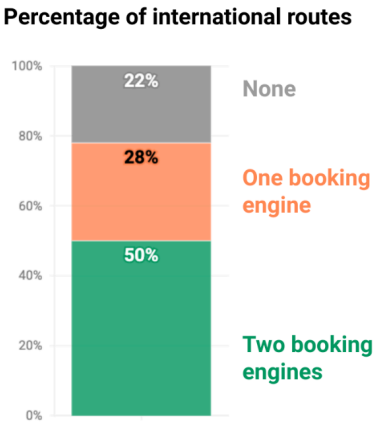
For domestic journeys, it was as expected always possible to book single tickets from the beginning to the end of a journey from incumbent operator booking engines. For international journeys, however, the picture is far less satisfactory. As shown on the figure below, **for over a fifth of the international routes studied (22%) it was impossible to book tickets** from the booking engines tested. **For another quarter of the routes (28%) it was possible to book only from one of the two booking engines tested** per route. For half of the routes investigated, it was possible to book from both booking engines of incumbent operators from the departing or arriving country. **This shows that booking issues affect not only routes between the busiest hubs, but are widespread across the EU.**

International journeys: a mixed picture for incumbent operator booking engines

Journeys can be booked in one go on:

Both booking engines · Only one booking engine · Neither of the booking engines





Source: T&E • Research performed between August and November 2025, on incumbent operator's booking engines from the departing and arriving countries of the routes studied

Air to rail?

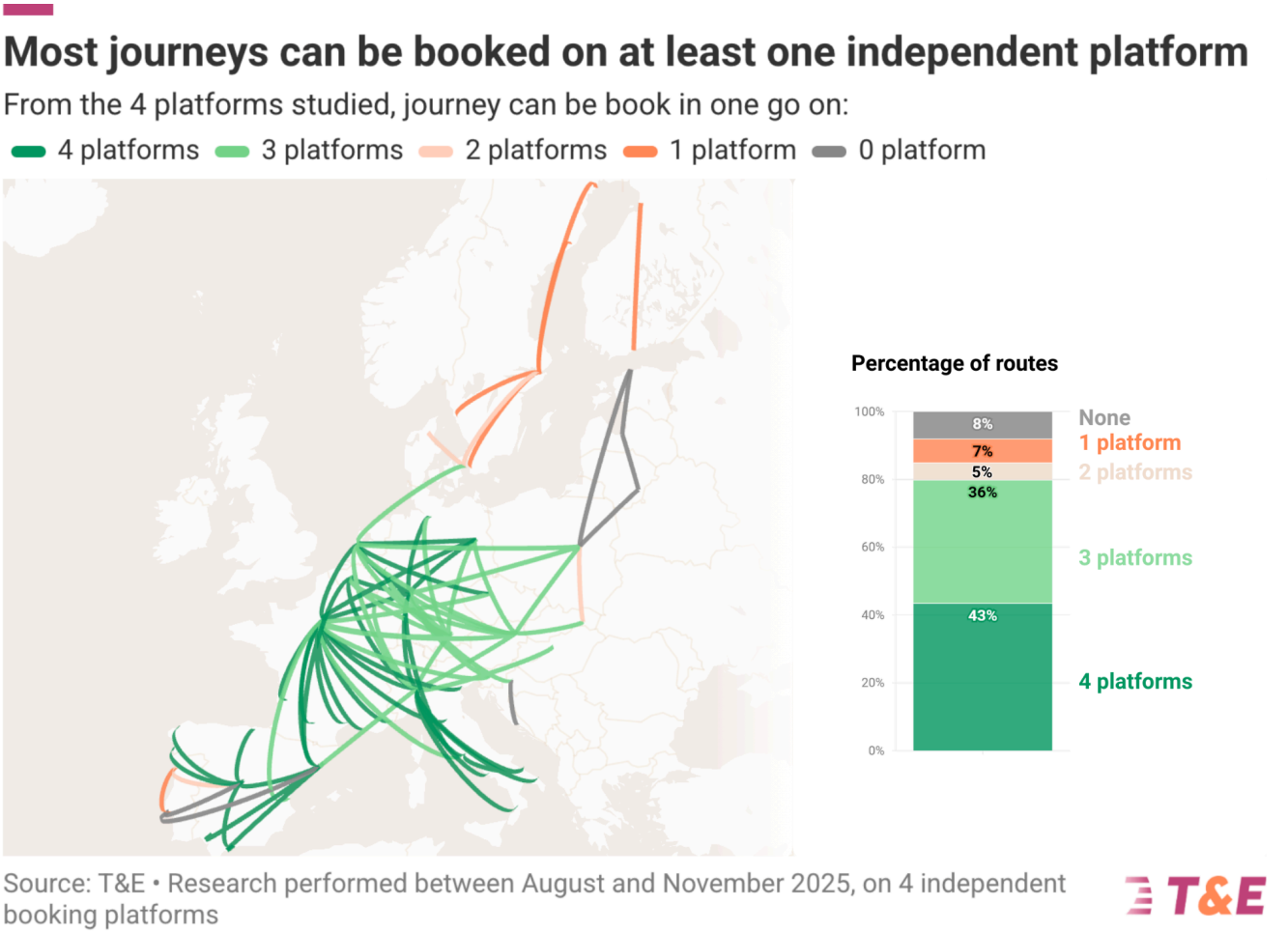
157,000 flights **1.9 Mt of CO_2**

Those are the total flight frequencies and CO_2 emissions linked with the activity of the aviation equivalent to the rail routes tested, for which booking from the incumbent operator's websites **is either impossible, or possible only from one of the two booking engines tested** (see figures above).

For example, our research shows that contrary to SNCF Connect, it's impossible to book a single rail journey from Barcelona to Paris on Renfe's website, even though more than 15,000 flights operate annually between the two cities (**more than 40 per day**).

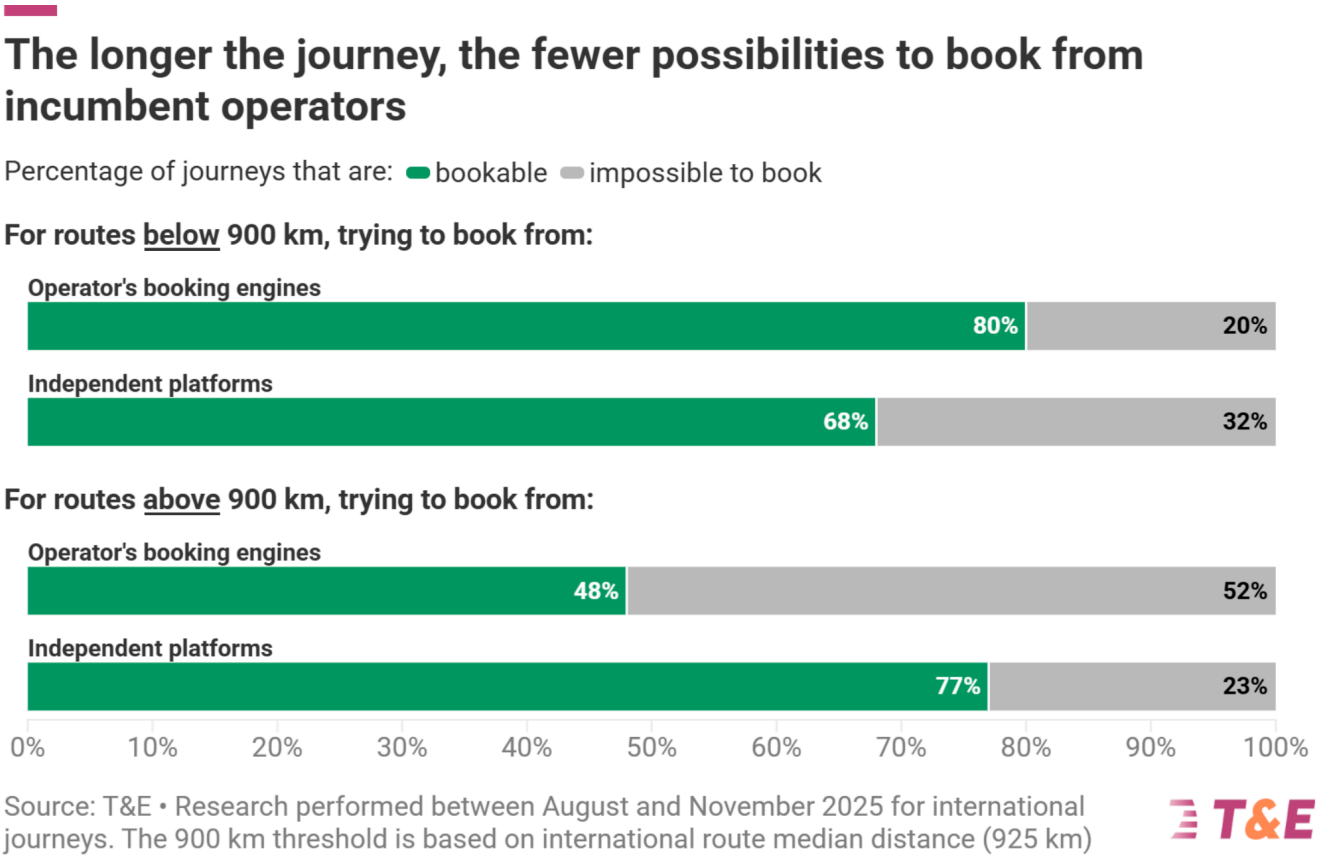
1.2 Booking from independent platforms

Based on the routes from our extended geographical coverage, we tested the possibility of booking domestic and international rail journeys in one go from the website of four independent rail booking platforms: Trainline, Omio, RailEurope and Kombo. As seen on the figure below, **for 80% of the 83 routes, it was possible to book rail journeys on at least three of the four tested platforms**.



Source: T&E • Research performed between August and November 2025, on 4 independent booking platforms

We further compared the booking possibilities from independent platforms with those of incumbent operators' booking engines, in relation to international journeys distance. The figure below reveals two contrasting patterns. **For incumbent operators, the possibilities to book decreases with journey distance increasing**. In contrast, independent platforms show the opposite trend, with booking possibilities increasing for longer journeys.



Selling long-distance journeys represents a commercial risk for incumbent operator platforms. Longer journeys tend to increase the likelihood of delays and missed connections (as outlined by Deutsche Bahn and ÖBB long distance and regional punctuality statistics), which may result in additional compensation and assistance obligations. Independent platforms, by contrast, usually do not offer such guarantees.

The majority of passengers use incumbent rail operators booking websites. For instance in Germany, the Monopolkommission showed that 9 out 10 web visits were done on bahn.de (DB's website) in comparison with other rail booking platforms. In France, there is evidence that 9 out 10 rail tickets are sold by SNCF connect. Considering their market dominance, **it is crucial that these platforms display and sell through tickets for long-distance journeys in order to encourage more passengers to take long distance rail journeys over flights.**

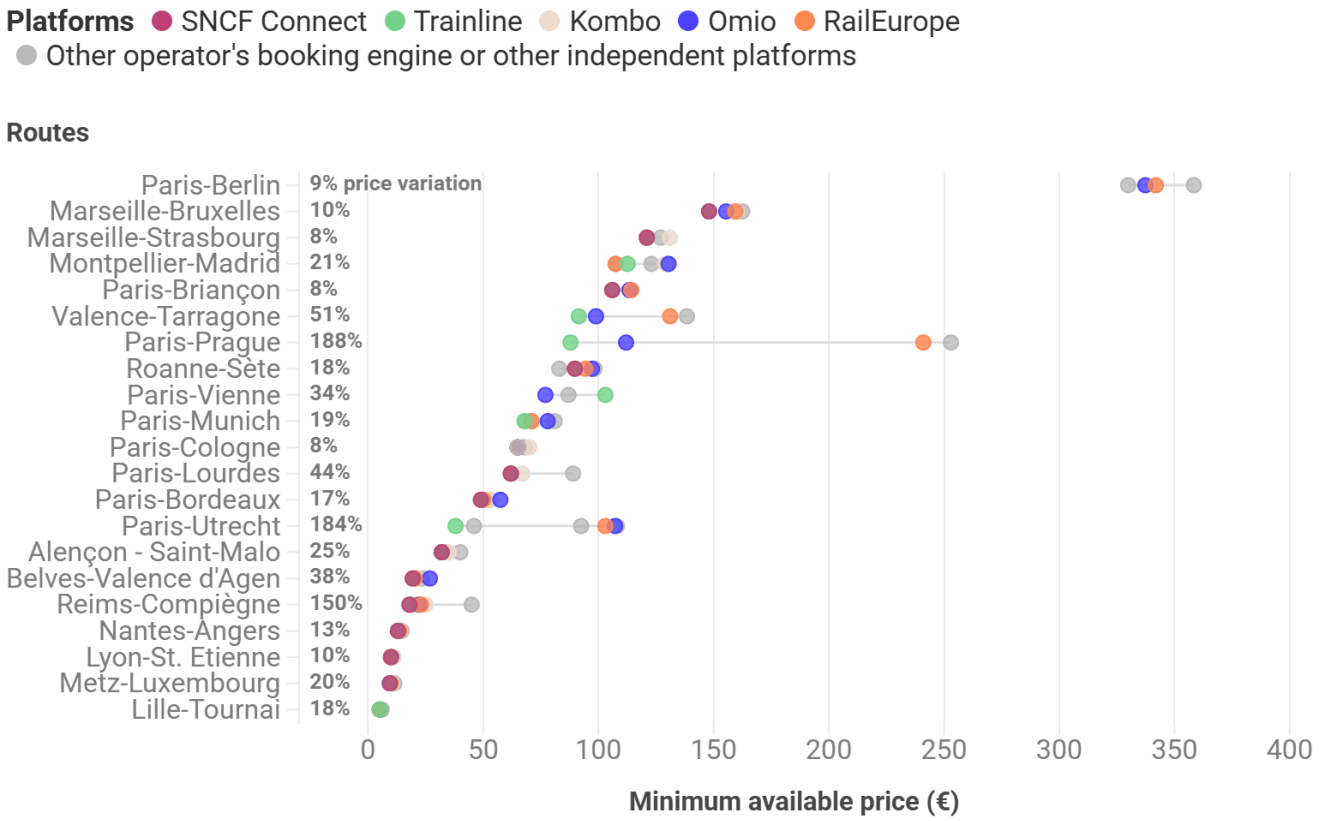
1.3 Case studies 1 and 2: other issues beyond booking possibilities

Booking complexities can be a major barrier passengers face when it comes to choosing rail for long-distance journeys, as demonstrated in YouGov's recent poll on this issue. But it's not the only barrier.

In their 2024 study, French consumer group Que Choisir Ensemble (formerly known as UFC que choisir) compared prices of train tickets among seven independent booking platforms, and websites from rail operators for more than 20 routes departing from France. Results are displayed on the figure below. Their conclusions are clear: **for a same journey, prices may be nearly three times as high depending on the platform used for booking**.

Depending on which booking platform they chose, passengers might face completely different prices for a same journey

Selected data from 2024 Que Choisir Ensemble analysis, based on 21 routes departing from France, with booking researches performed on 7 ticketing platforms and rail operator websites



Source: Que choisir Ensemble • Minimum price available (2nd class) collected in July and August 2024 for departing dates between August and November 2024.

Case study 1: special fares or subscriptions from operators, not available on third party platforms.

These price variations result from several factors, including the fact that in some cases passengers may not find operators' best fares or special offers when booking through third-party platforms. The table below highlights five examples of specific fares or subscriptions from rail operators that were not available for a passenger to book at the time of our research on all of the four independent platforms that we investigated, leading to significant price differences. It's worth noting that independent platforms may also apply service fees, which can further increase these price differences.

Testing operator special fares or subscriptions availability for booking on independent platforms

Offer	Route and date-time analysed	Price on operator's website	Price on Trainline	Price on Omio	Price on Raileurope	Price on Kombo	Average ticket price difference with platforms
NS Voordeel	Amsterdam-Rotterdam *20 Jan 09:06*	**€12.1** with subscription (**€20.2** without subscription)	No NS tickets on Trainline	Reduce fare not available: **€21**	Reduce fare not available: **€20.2**	No NS tickets on Kombo	**1.7 times** more expensive
SNCB Train+	Antwerpen-Liège *04 Mar 10:25*	**€12.8** with subscription (**€20.9** without subscription)	Reduce fare not available: **€25.6**	SNCB Train+ available: **€13.6**	Reduce fare not available: **€21.3**	No SNCB tickets on Kombo	**1.8 times** more expensive on platforms not proposing the fare
DSB Orange ticket	Aalborg-Copenhagen *20 Jan 09:25*	**€13.2**	No DSB tickets on Trainline	No special fare: **€80**	No DSB tickets on Raileurope	No DSB tickets on Kombo	**6 times** more expensive
Italo eXtra Magic	Milan-Rome *28 Jan 12:20*	**€39.9**	eXtra Magic available: **€39.9**	No special fare: **€49**	No special fare: **€43.9**	eXtra Magic available: **€39.9**	Close to **1.2 times** more expensive on platforms not proposing the fare
Eurostar SNAP	Amsterdam-Paris *14 Jan. Average prices of trains departing between 06:10 and 14:00*	Price on snap.eurostar.com **€45**	No special fare: **€98.3**	No special fare: **€98.3**	No special fare: **€98.3**	No special fare: **€98.3**	**2.2 times** more expensive

Source: T&E. Research was performed on the 6th January 2026 for NS Voordeel, DSB Orange, Eurostar Snap and Italo eXtra Magic. Research performed on the 25 February for SNCB Train+. Prices collected, for the indicated dates and time. **Ticket prices displayed without taking into account platform booking fees**. At the time of research, Italo eXtra Magic was available on omio.it, but not on omio.com

These situations may result from different causes. In some cases, rail operators may choose not to share certain special offers or subscriptions with third-party platforms. In other cases, even if operators make their special fares available for resale, independent platforms may not be willing to integrate and display these offers. For instance, even if NS standard ticket prices are similar between all booking engines investigated, independent platforms do not propose prices similar to the *NS Voordeel* subscription. However, it seems that any third parties with access to the NS resell package have the possibility to match their ticket prices with subscription.

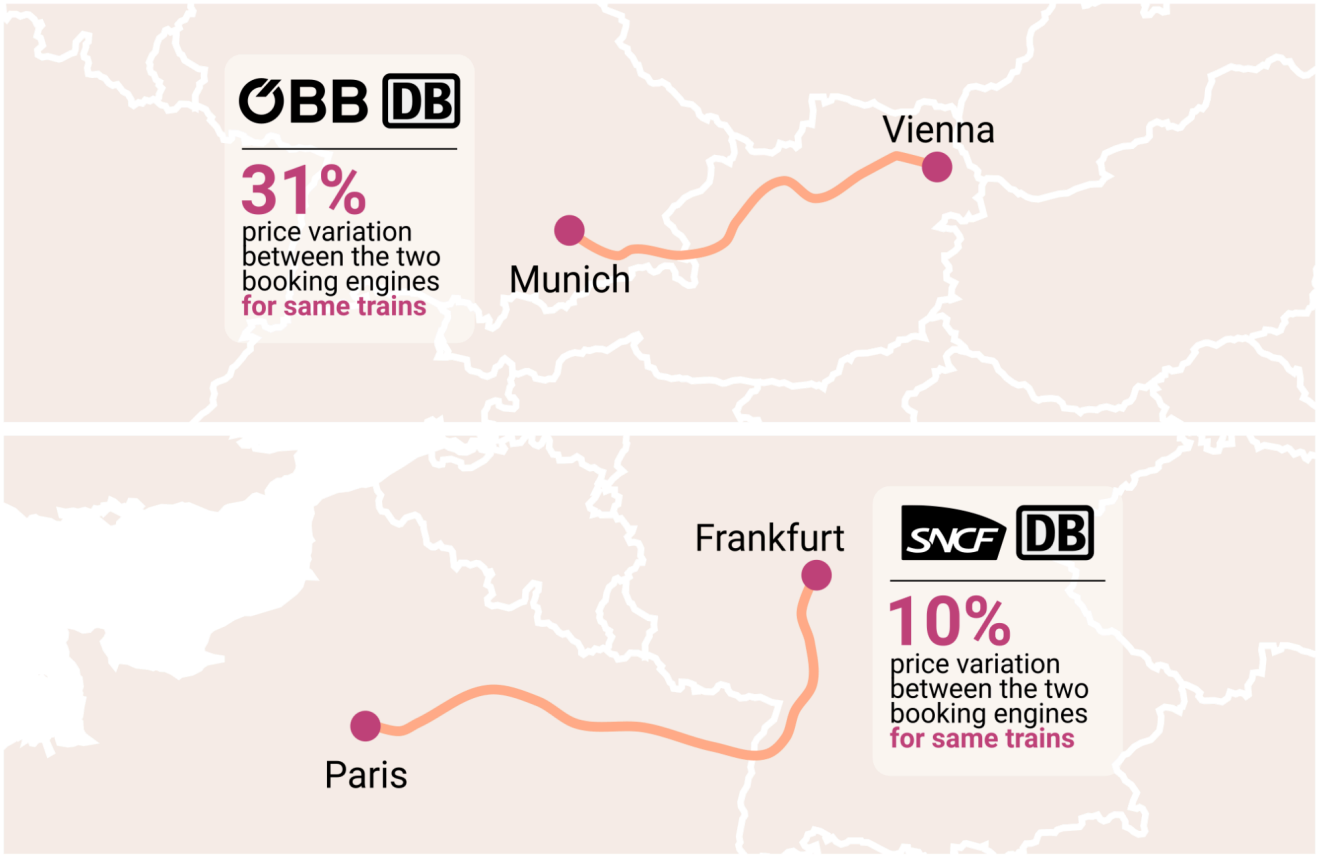
Regardless which parties are responsible for the price variations described in the above table, the upcoming MDMS regulation should ensure that passengers face comparable prices no matter where they book their tickets.

Case study 2: price differences from a same train

In particular cases, when several operators coinjointly run services on a route, passengers may face very different prices across booking engines from the two operators, even though trying to book a ticket for the exact same train. In the situation highlighted on the map below, DB and ÖBB jointly operate IC and Railjet trains between Munich and Vienna. Each of them apply their own fare system and yield management to their respective seats quotas. Prices fluctuate depending on how each operator sells its tickets and specific offers, resulting in noticeable differences between booking engines: our research showed that **prices on the two booking engines differed by more than 30%** for the connections we analysed. Similarly, DB and SNCF operate joint ICE and TGV services between Frankfurt and Paris. In this case also, both operators apply their own pricing management. Our research highlights an average **price variation of 10% between the two booking engines**.

Depending on the booking platform, passengers may pay very different prices for the same train

These two examples highlight services jointly operated by two operators. However, in each case operators apply their **own fare system and yield management independently, resulting in significant price differences**



Source: Operator's booking engines, for journeys departing in one or two weeks. Research performed 07 Jan 2026 for Munich-Vienna, and the 05 Feb 2026 for Paris-Frankfurt

What could be the impact of the Commission's new regulations on rail booking?

With the SDBTR and MDMS package, new regulation should mandate operators with significant market power (SMP) to allow third party platforms with SMP to resell their tickets, including all special fares. The package could also mandate third party booking platforms to sell these tickets which would expand booking options on independent platforms, and also potentially on other vertically integrated booking platforms.

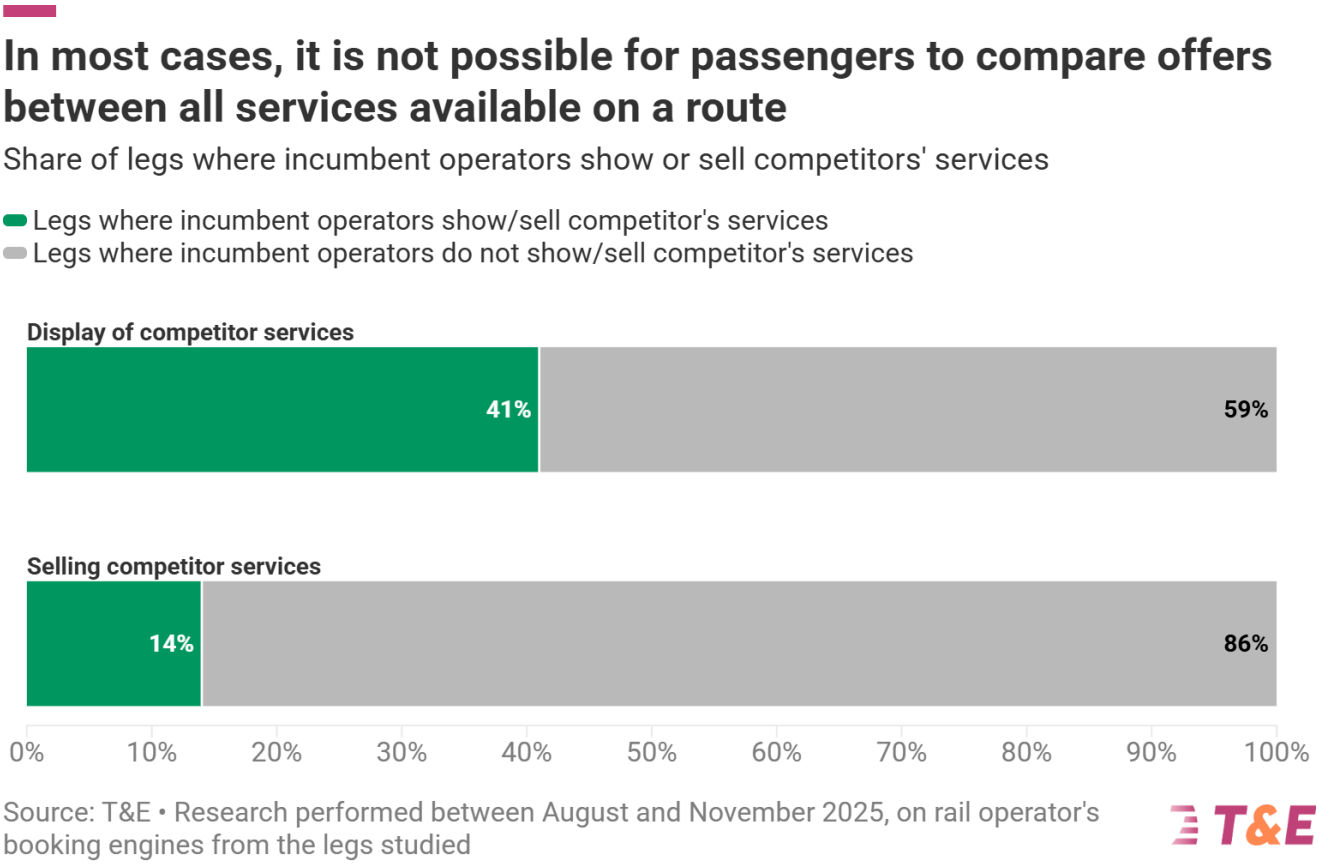
2. How incumbents display competitor services on shared routes

2.1. Limited display of competitor services

Our investigation shows that displaying competitors' services is not common practice among incumbent operators : **competitors' services were displayed for only 41% of the legs studied**. **Selling those services is even less common** (only on **14%** of the legs analysed). The lack of options to compare services from different rail operators on a same booking engine is a barrier to seamless rail booking. According to our findings, this lack of comparability seems to be especially true when trying to book a journey on rail operator websites.

We investigated how incumbent operators are displaying, or selling their competitor services when running on the same route. To do so, for each of the 83 routes from our extended geographical coverage, we considered the relevant itineraries to go from the departing to the arriving cities. For all the legs of these itineraries, we identified the number of operators running services. For instance, from Barcelona to Sevilla, it's possible to travel with Renfe and Iryo that are operating direct services. It's also possible to travel first from Barcelona to Madrid with Renfe, Iryo or Ouigo, and change trains in Madrid to reach Sevilla, with one of the three same operators. In that case, we investigated how Renfe were displaying or selling competitors' services for trips between Barcelona - Sevilla, Barcelona - Madrid, and Madrid - Sevilla.

We observed competition on 53 routes (70% of the routes analysed), occurring on 51 legs. For all legs, we investigated whether incumbent operators were displaying, or selling, their competitor offers on their own booking engines. Results are displayed below.

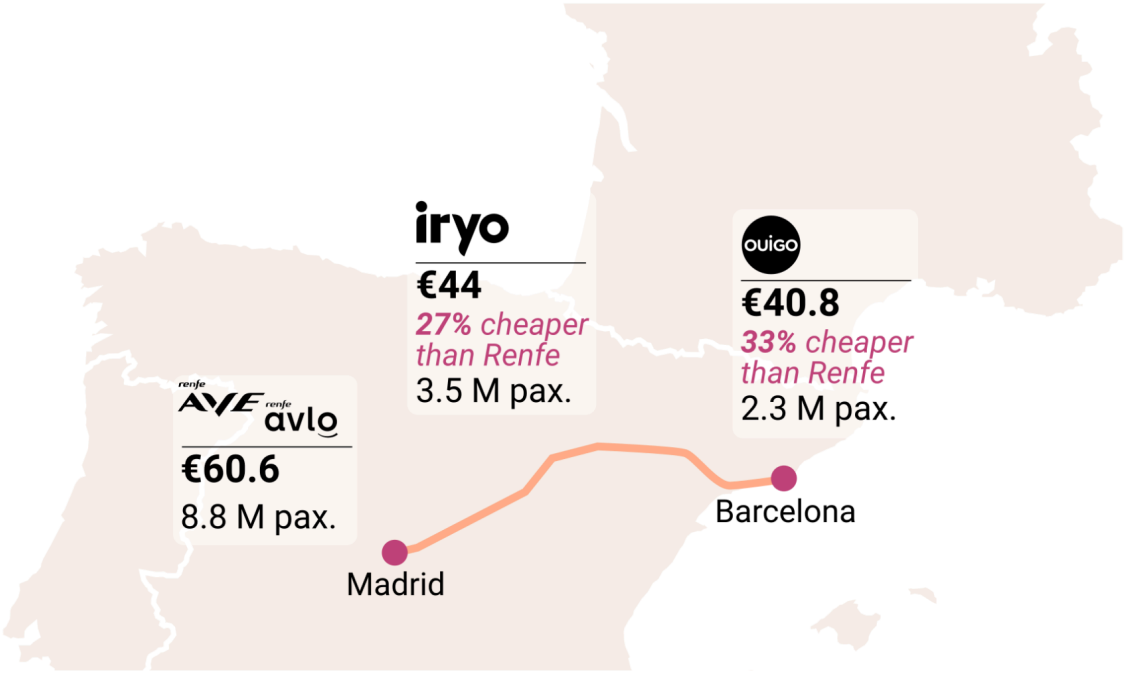


2.2. Case study 3: What is the impact for passengers when they are not able to compare offers from different train companies?

Our results show that in 59% of the legs studied, incumbent rail operators, such as Renfe, DB or SNCF, do not display competing services on their vertically integrated ticketing platform (see the above section). **According to the 2024 quarterly reports** of the Spanish competition authority, **tickets offered by Ouigo and Iryo on the Madrid - Barcelona route are, on average, close to a third cheaper than Renfe's** (see the map below). However, because these offers are not displayed on Renfe's website, millions of passengers are prevented from easily comparing services on the same timetable.

Major rail companies often fail to display new entrant's tickets on their websites which prevents passengers from easily comparing services on the same route or even prevents passengers from being aware of the existence of these services. A recent survey by Opinionway for French passenger federation FNAUT showed that in France, only 15% of respondents '*knew Trenitalia well*', and just 11% for Renfe, the two new entrants on the French network. By contrast, 53% indicated that they had '*never heard of*' Trenitalia, rising to 68% for Renfe.

By not showing competitor offers, incumbent operators prevent millions of passengers from easily comparing cheaper options



Source: Weighted average prices and total passengers based on 2024 quarterly reports from Comisión Nacional de los Mercados y la Competencia.

What could be the impact of the Commission's new regulations on display of available services?

The MDMS regulation should mandate platforms to show all existing services and connections existing on their geographic scope. This could mean for instance Ouigo and Iryo services could be displayed on Renfe's booking engine, or Trenitalia France trains display on SNCF Connect. This would allow passengers to seamlessly compare all offers available on the same route.

Recommendations

1	All major rail operator booking platforms with significant market power should be required to **display and sell available tickets** domestically and internationally**.** This includes **selling and displaying willing competitors' tickets** under FRAND (Fair, Reasonable, and Non-Discriminatory terms), to ensure passengers can access the best ticket for their journey.
2	Rail operators with significant market power **should be required to share journey data with other willing operators and third party platforms** under FRAND. This includes fares, delays, cancellations, disability or bike access and real time data so that passengers have access to all relevant information for their journey regardless of where they booked their tickets.
3	**Third party booking platforms with significant market power should be mandated to display and sell tickets from all willing operators including** all ticket discounts and offers, to ensure passengers can access the cheapest available tickets and current journey data.

What should the geographical scope of this regulation be?

Major rail operator booking platforms with significant market power must provide access to all rail segments necessary to complete a passenger journey between two European cities, if it is considered a "Single Market Relevant" route.

Definition of a Single Market Relevant Rail Passenger route
A single market relevant rail passenger route is where a rail journey between an origin and a destination satisfies all of the following conditions:

a) Identifiable Passenger Demand
There is demonstrable and non-negligible passenger demand for travel between the origin and destination, as evidenced by air ticket sales data and road traffic, search queries, transport studies, or other relevant market indicators.

b) Reasonable Rail Feasibility
The journey can be completed exclusively by rail services operated by one or more railway undertakings, involving no more than three legs.

What about the revision to Rail Passenger Rights Regulation (RPRR)?

T&E's full stance on RPRR revision is available in our public consultation on the European Commission's website here. T&E will be publishing another full report on this issue in the coming months, and will continue our campaign to improve the rights of passengers travelling by train in the EU.

What other factors are important to consider for the upcoming EU ticketing regulations?

In addition, other important points should be addressed in the upcoming SDBTR and MDMS regulations under FRAND where relevant, such as:

- Ensuring operators offer fair prices to third-party platforms for ticket resale
- Ensuring independent platforms apply service fees fairly, and transparently
- Ensuring operators make their full catalogue of products available to third-party platforms, including bike space reservations, tickets and assistance for passengers with reduced mobility, or any other add-ons
- Ensuring that all available services are displayed fairly, without favoring any specific operator
- All travel platforms should demonstrate climate impact for each trip (greenhouse gas emissions and non CO_2 effects) so that passengers can make informed decisions about the impact of their journey.

Conclusion

The latest EU survey by European railway lobby group CER suggests that passengers are increasingly keen to travel by high speed rail over flying. However, despite this public appetite and flying being the most carbon-intensive travel mode, aviation traffic continues to grow each year after a sharp decrease in demand during the Covid-19 pandemic. We urge EU policy makers to seize the opportunities available particularly under SDBTR and MDMS to address market failures and ensure that climate friendly travel is easy, accessible and affordable for all. We want passengers to be able to book one through journey with multiple legs from the beginning to the end of their journey on one website in a seamless booking, whether that's a third party booking platform or on the market dominant rail companies' websites where most passengers are currently booking their train tickets.

T&E advocates for an ambitious Single Ticketing Package, starting with an ambitious proposal from the European Commission which we anticipate to be published in the coming months. It's time to make rail travel available and attractive to the ever growing market of passengers keen for climate friendly travel and to meet the EU's untapped rail potential.

Recommended readings

- Etude sur les marques relatives aux déplacements - An OpinionWay survey for FNAUT, 2024
- Informes trimestrales de supervisión del mercado de transporte ferroviario 2024 - CNMC, 2024
- International Rail Ticketing: Future Perspectives on Competitive Booking Procedures for European Railways - David Prenninger, University of Applied Sciences St. Pölten, 2023
- L'information tarifaire et les droits des consommateurs déraillent - Que Choisir Ensemble, 2024
- Market dominant rail ticket vendors must finally be opened up to ensure multichannel sales - ALLRAIL, 2025
- Opinion poll: rail booking and ticketing - Transport & Environment, 2025
- Perception of High-Speed Rail in Europe - CER, 2025
- Railway to (consumer) heaven: BEUC report on an "EU Masterplan for Rail" - BEUC, 2024
- Simplifying European Ticketing: A chance for a green transformation of public and multimodal transport in the European Union - Jon worth, 2024

Methodological note

1. Data review with operators and third party platforms and right of reply

All data collected for the research on booking possibilities and the display and sale of offers in cases of competition were shared with the relevant rail operators and booking platforms. This review process allowed them a right of reply to our claims, and to confirm or correct the information collected. All itineraries included in this analysis were reviewed with rail operators to correct itineraries that involved poor or technically irrelevant connection options and to identify itineraries that may have been overlooked. From the 36 companies contacted (operators and independent platforms), only Italo and CFL did not provide any feedback. Any development in booking policies introduced after 1 November 2025 are not considered in this research.

Regarding case study 1, each independent platform and operator from which data was collected was contacted to verify data accuracy. For case study 2, DB, SNCF and ÖBB were contacted to understand the reasons behind differences observed for jointly operated services. All our conclusions based on these case studies were shared with relevant stakeholders to allow them a right of reply.

2. Overall research process

Our aim is to evaluate the necessity of the forthcoming EU single ticketing regulation. With this research we are providing an overview of the current rail booking possibilities in the EU, and the possibilities to compare or buy offers from different rail operators running on the same route. To do so, we are basing our research on routes among the most heavily frequented by aviation in the EU, and investigate the booking possibilities of rail equivalent journeys.

Our analysis is based on a selection of aviation routes, for which we investigated rail journey equivalents. This approach allows us to focus on hubs that are strongly connected by high-volume long-distance passenger flows, both domestic and international. This comparison allows us to highlight potential mismatches between the putative limited availability of rail booking options and some of the most polluting air routes in Europe.

3. Route selection

Selection process

Using OAG data, we have aggregated flight frequencies from 2024 per city pairs in the European Union. As shown on the infographic below, we first extracted the top 100 frequented EU routes (between Member States only), and excluded destinations that are impossible to reach by international rail. The list of excluded destinations are : EU Outermost regions; Cyprus; Ireland; Malta; Greece; Corsica; Sicily and Dubrovnik (Dubrovnik has no passenger rail station).

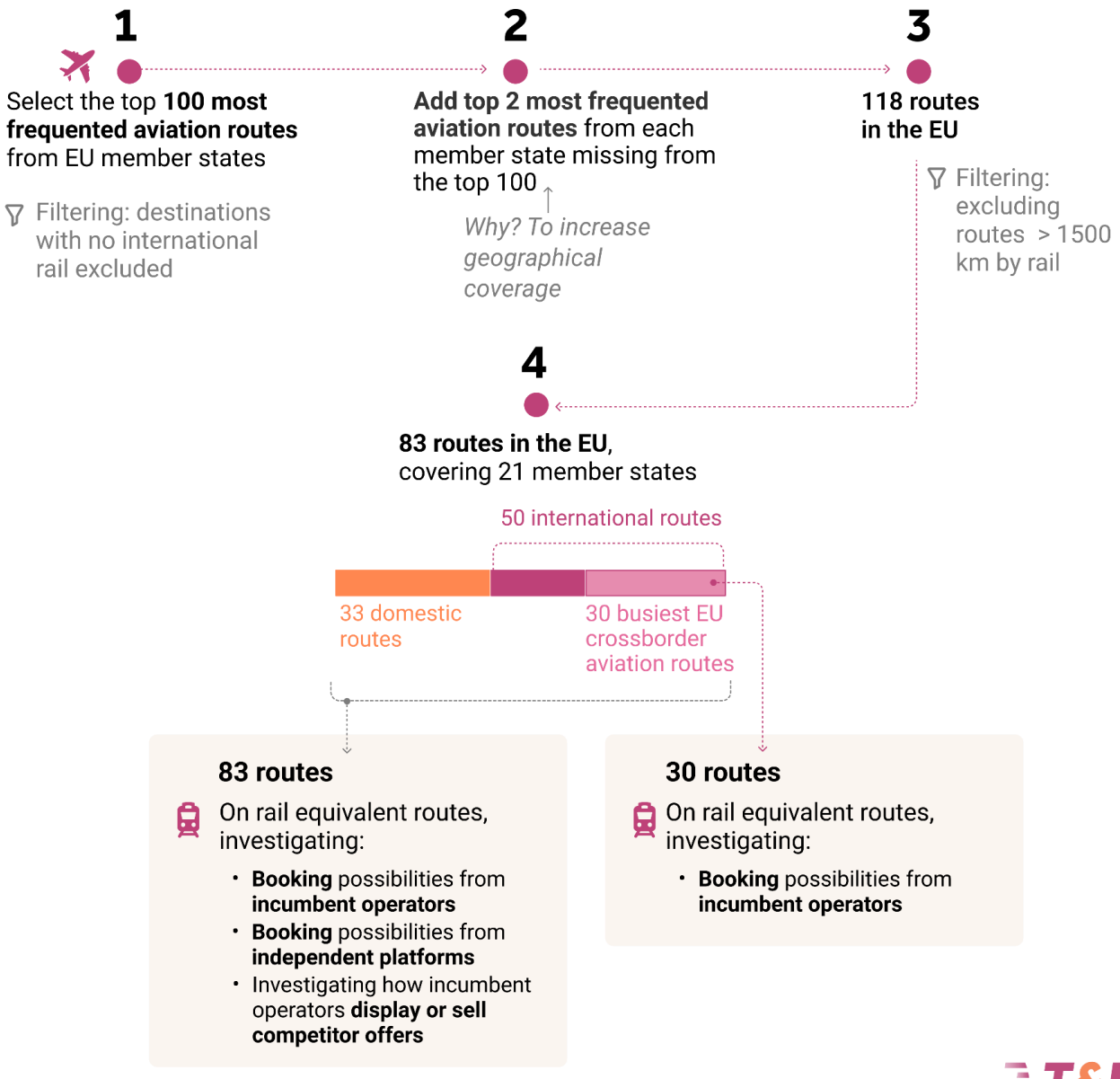
Since this top 100 route is based on most connected hubs, it is de facto centered towards Western Europe. To increase our geographical coverage, we identified Member States that were not represented in the top 100 routes, and added to our selection the top 2 destinations departing from each of these countries (still applying the same exclusion criteria as above). After this step, our selection totalled 118 routes within the EU.

Finally we filtered our 118 routes based on rail journey distance, to exclude all journeys above 1500 Km. We estimated rail journey distances using Google Maps Distance API. This resulted in a list of 83 routes within the EU, including 33 domestic and 50 international routes and covering 21 Member States. Due to this filtering, two member states with international rail connections are not covered in our analysis: Bulgaria and Romania.

For these 83 routes, we estimated aviation emissions by calculating the aircraft fuel consumption of scheduled flights data from OAG, and applied the emission factor of kerosene. Fuel consumption from aircraft is calculated following Eurocontrol's fuel consumption methodology.

Route selection and analysis process

Starting from the busiest aviation routes in the EU to investigate the possibility to book tickets or compare offers on rail equivalent journeys



Source: T&E, Aviation data from OAG (2024)

Analysis scopes: top 30 aviation routes *vs* extended geographical scope

For the first part of our analysis covering booking journeys from incumbent rail operator booking engines we conducted our research in two steps. First, we focused our research on a subset of 30 routes, which corresponds to the 30 cross-border routes that are the most frequently flown in the EU, and for which international rail equivalents are below 1500 km. In a second step, we extended our research to cover all the other destinations from the rest of our 83 routes selected as explained above.

4. Data collection

All data for our main research (booking possibilities and display of competitor's offers were collected between August and November 2025. No updates were taken into account after this cutoff date.

4.1 Booking possibilities from incumbent operators

We investigated the possibilities to book a journey, **in one go**, from the booking engines from the departing and arriving country of each route included in our research. For instance, for a journey between Paris and Frankfurt, we investigated the possibilities to book from SNCF connect and from DB's website. We chose to focus on booking engines from incumbent operators as these platforms are market dominant and that passengers tend to book rail tickets from their own national incumbent operators.

In this research we are referring to the booking possibilities of **journeys** as we are testing the possibilities to connect all departing and arriving cities from our route selection, without taking into account the potential number of tickets issued by the operators at the end of the booking process.

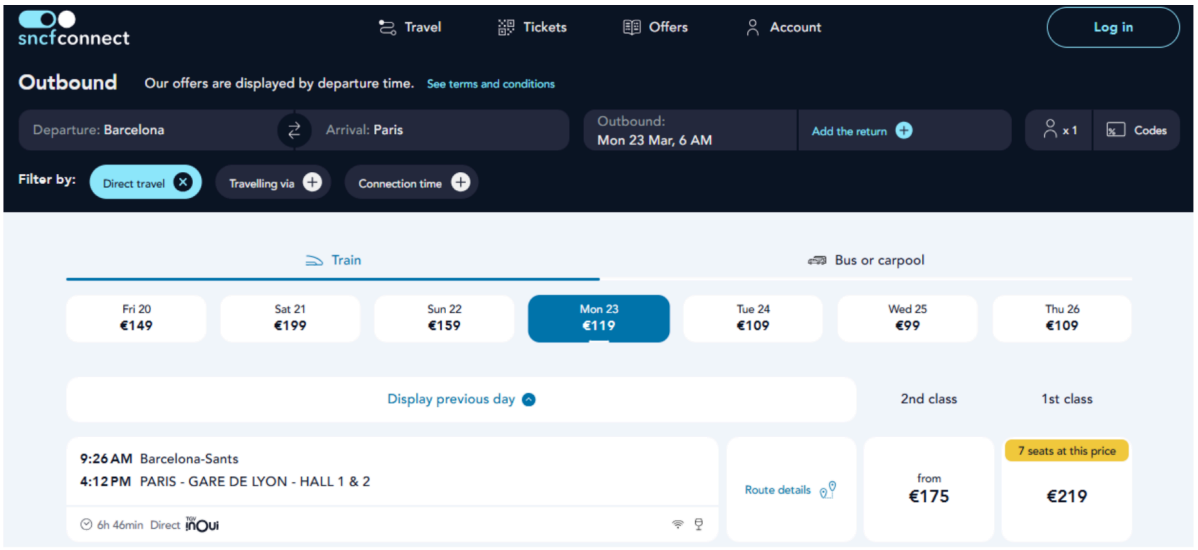
For the booking possibility to be considered as successful, the research from the tested booking engine must return a result connecting the two cities, and clearly indicate that this option is possible to book. See examples highlighted in the screenshots below. Each research was performed in **one go**, meaning that the departing and arriving cities of each route were directly entered in the tested booking engine**. We never tested the possibilities to book by entering an intermediate city** (e.g. for a journey Milan-Paris we directly tested the booking possibilities from Milan to Paris. We did not try Milan-Lyon, and then Lyon-Paris).

To ensure that booking failures were not due to train services being fully booked, or to train services not running on the route on a particular day of the week, we tested booking journeys booking well in advance (two weeks to one month in advance) and at several days during the week.

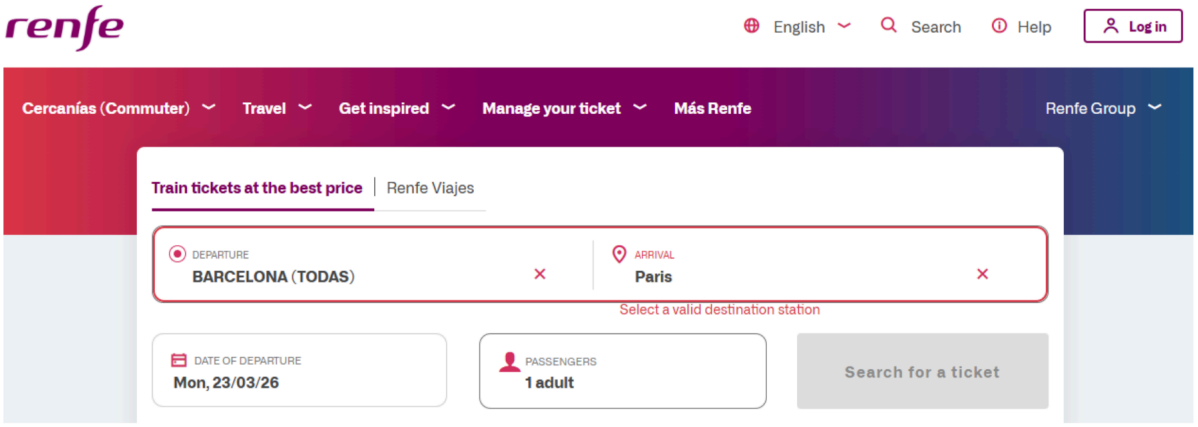
Evaluating booking possibilities from incumbent operators

Example for the Barcelona - Paris route

From SNCF connect the journey **can be booked in one go.**



However on Renfe's booking engine, Paris is not a valid destination, and it is not possible to launch the research: **the journey cannot be booked.**



Source: T&E

4.2 Booking possibilities from independent platforms

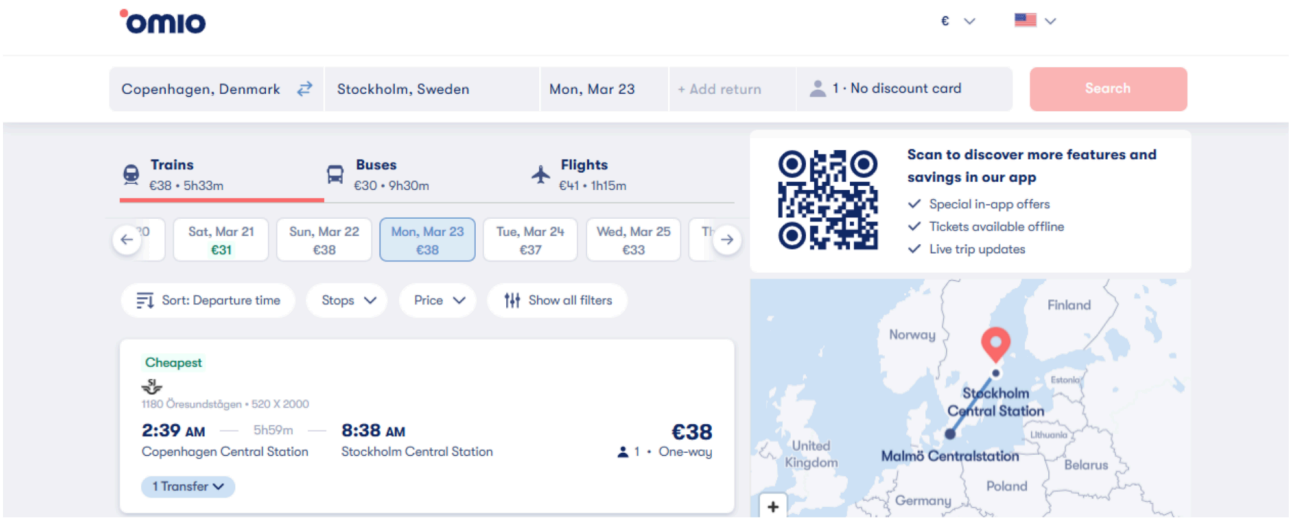
We investigated the possibilities to book a journey, **in one go**, from the booking engines of four different independent booking platforms : Trainline, Omio, RailEurope, Kombo. As for booking from incumbent operators, for a booking possibility to be considered as successful, the tested website must clearly display that the journey is available for booking (see the screenshots below). Note that we considered train booking possibilities only, and did not take into account journeys available by coaches.

As for booking possibilities on operator's websites, to ensure that booking failures were not due to fully booked trains or by services not operating on specific days, we tested booked journeys several weeks in advance and on multiple days of the week.

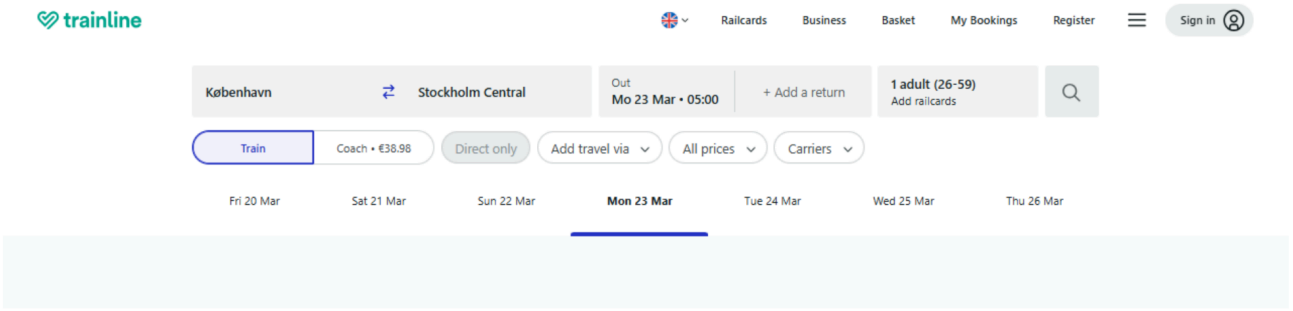
Evaluating booking possibilities from independent platforms

Example for the Copenhagen - Stockholm route

From Omio the journey **can be booked in one go.**



However on Trainline's booking engine, no train options are available: **the journey cannot be booked.**



Source: T&E

4.3 Comparing booking possibilities from incumbent operators and from independent platforms in relation to journey length

Our research showed that the average length of journeys possible to book was **842 km for incumbent operators**, and **954 km for independent platforms**. To assess if this 13% difference was statistically significant, we performed a Wilcoxon test, as the distance distributions were not following a normal distribution. We found a p.value of 0.04, suggesting that **the journey distances bookable from independent platforms are significantly higher than the ones bookable from incumbent operators**.

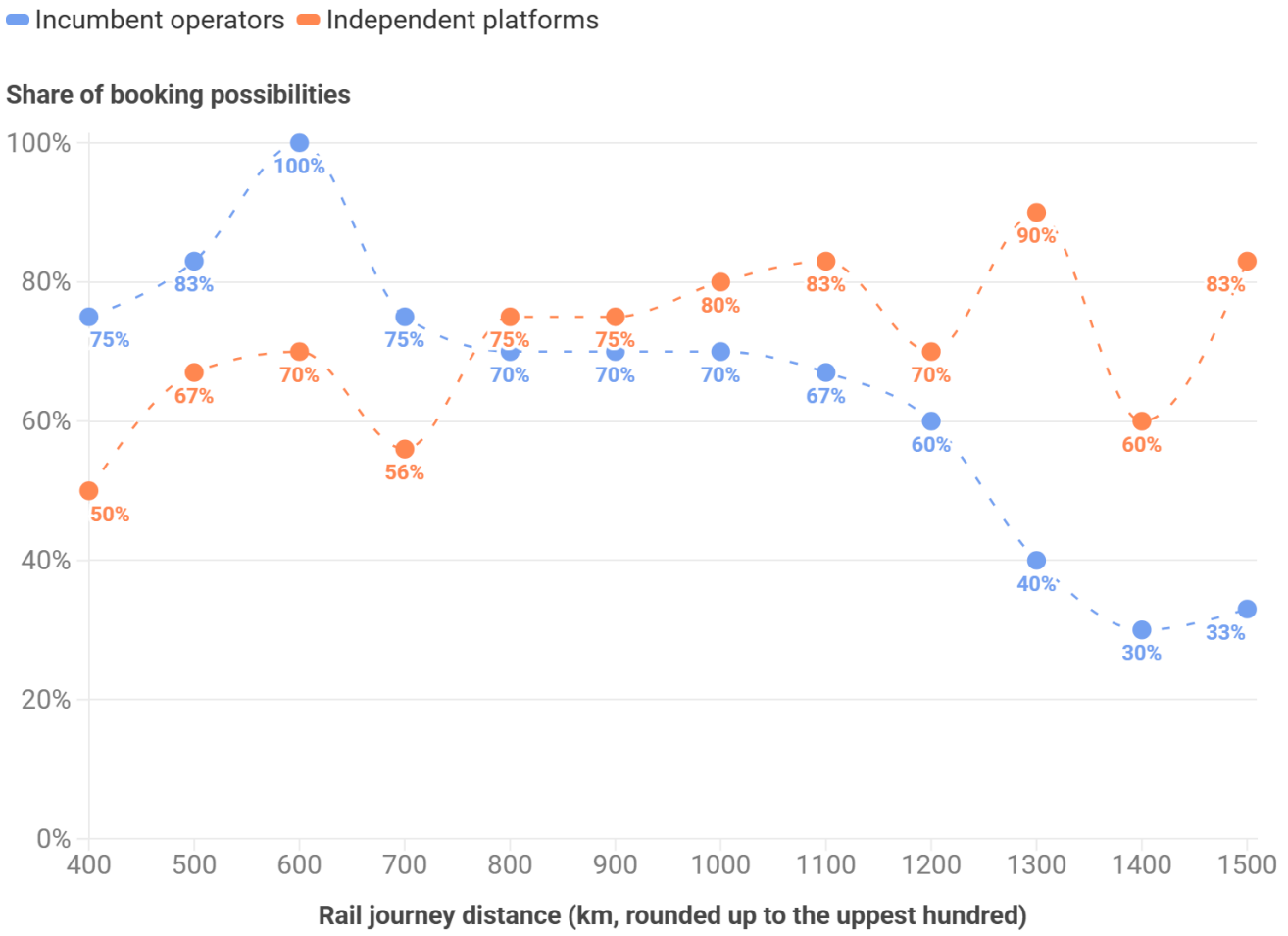
We further investigated how booking possibilities were influenced by journey distance for incumbent operators and independent platforms. In the figure plot below we grouped journeys

in 100 km ranges and calculated the share of booking possibilities as follows :

$$Booking\ possibilities = \frac{Total\ journeys\ possible\ to\ book\ across\ all\ tested\ booking\ engines}{(Number\ of\ routes \times Number\ of\ booking\ engines\ tested\ per\ route)}$$

For incumbent operator booking engines, the number of routes is multiplied by two because, for each route, we evaluated the operator from the departing and arriving countries. For independent platforms, the number of routes is multiplied by four, as we tested four booking engines per route (Trainline, Omio, RailEurope, Kombo).

Booking possibilities decrease with journey distance for incumbent operators, but tend to increase for independent platforms



Source: T&E • Research performed between August and November 2025, on incumbent operator's booking engines from the departing and arriving countries and on 4 independent platforms. Only international journeys are displayed

It appears that **booking possibilities decrease with journey for incumbent operators**, while we observed the **opposite trend for independent platforms**. To test if this observation was statistically significant, we analysed our data using a generalised model (GLM) with a logit link function, following a binomial distribution. We analysed the effects of the booking engine types and journey distances through an analysis of deviance which revealed a significant interaction between these variables (χ^2=15.8 ; degree of freedom = 1 ; p.value < 0.001). **This is confirming that distance affects booking possibilities differently for incumbent operators and independent platforms**.

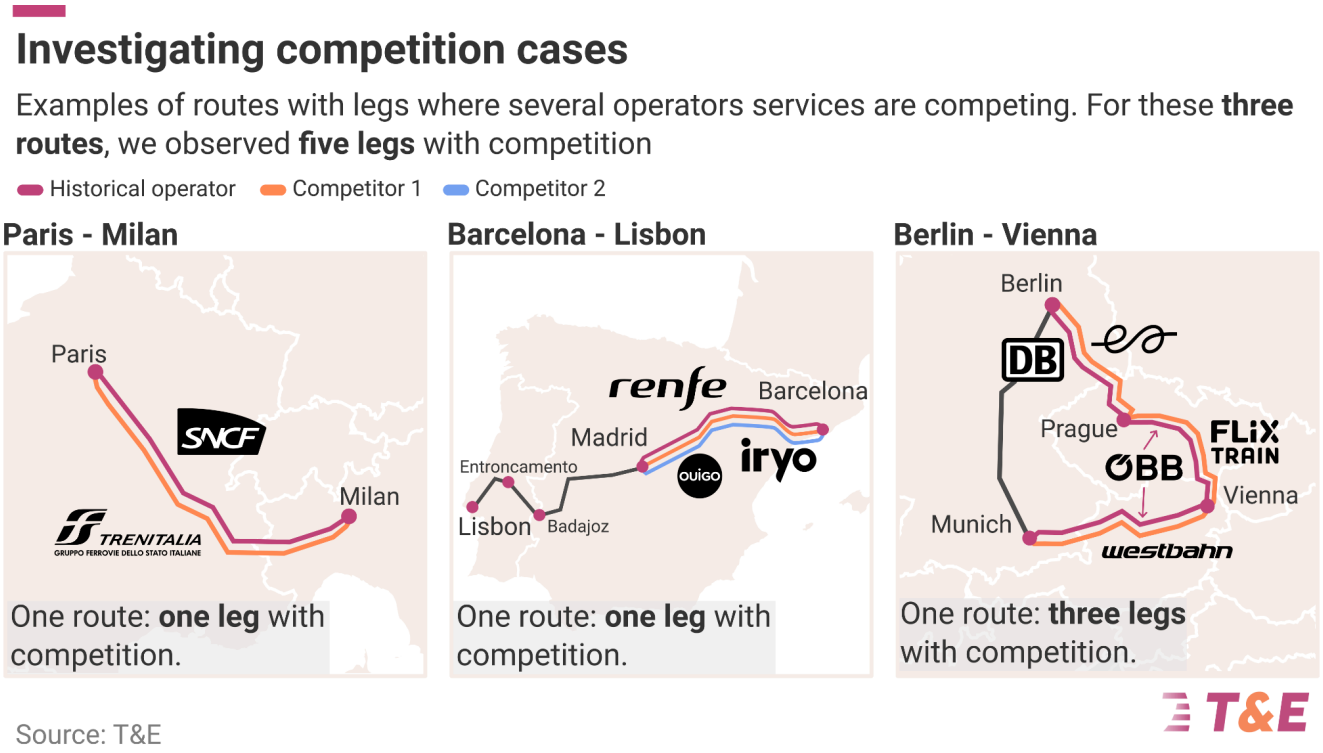
To have a clear display of this pattern in our report, we divided our data in two subsets, based on the median international journey distance (925 km) and plotted the booking possibilities per platform (calculated using the formula above), for journeys below and above median distance (see the Result section 1.2).

4.4 Display and selling of competitor's services by incumbent operators

To evaluate how incumbent operators are displaying or selling their competitor's offer on their booking engines, we first investigated where competition was taking place in the routes included in our study. To do so, for each route we first identified the different relevant itineraries that could be used to travel between departing and arriving cities. For instance, to go from Berlin to Vienna, it's possible to travel from Berlin to Munich, and then jump in another train to reach Vienna. It is also possible to use direct Railjet trains going through the Czech Republic, and it is also possible to change trains in Prague: three different possible itineraries for the Berlin - Vienna route.

Then, for all identified itineraries, we looked at the operators running services on all legs, to identify competition cases. In the three examples illustrated in the table and infographic below, for three routes, we identified five legs with competition. For each leg where we identified competition, we investigated how incumbent operators were showing or selling their competitor offers on their own vertically integrated booking engines.

For certain legs, where the distinction between the incumbent operator and the new entrant is not straightforward (e.g. Eurostar and SNCF Ouigo services on Brussels-Paris), we defined the incumbent as the operator that historically began operating on the route and currently runs the highest number of daily services.



Source: T&E

Example of routes with legs where several operators services are competing

Route	Itinerary	Leg with competition	Operators running services
Paris - Milan	Paris - Milan	Paris - Milan	SNCF, Trenitalia
Barcelona - Lisbon	Barcelona - Madrid - Lisbon	Barcelona - Madrid	Renfe, Ouigo, Iryo
Berlin - Vienna	Berlin - Munich - Vienna	Munich - Vienna	ÖBB, Westbahn
	Berlin - Prague- Vienna	Berlin - Prague	DB, European Sleeper
		Prague - Vienna	ÖBB, Flixtrain

4.5 Case studies

In this report, we developed three different case studies. Case studies 1 and 2 (see result section 1.3) are based on data collected from operators' and independent platforms' websites. Research dates are specified in each infographics. For case study 1, we compared operator specials fares availability for booking by a passenger on independent platforms. Prices are based on specific examples of journeys for specific days and time within the day for NS Voordeel, SNCB Train+, DSB Orange ticket, Italo eXtra Magic. For Eurostar Snap prices, we compared prices for a train departing in the morning, i.e. 06:10 - 14:00, on snap.eurostar.com with average prices of trains departing at similar times on independent platforms. Data collected reflects the ticket prices displayed to and available for purchase by passengers. Regarding NS tickets, during our exchange with NS, they indicated to us that they offer the same prices and discounts to all third parties wishing to resell their products.

In case study 2, we focused on trains that are jointly operated by two operators. For these trains, we are comparing price differences between booking engines of the two operators running the service. We collected prices for trains departing 7 and 14 days after the research date. For each train available for booking at the same time on both booking engines, we calculated the absolute price difference expressed as a percentage variation. We then averaged these values to estimate the overall price variation between the two booking engines.

In case study 3 (see result section 2.2), we compared prices of the three operators running services between Barcelona and Madrid. To do so, we collected data from the 2024 trimestrial reports from the CNMC. Annual average prices for Renfe, Iryo and Ouigo were calculated using weighted averages based on their own trimestrial prices and passenger numbers. For Renfe, weighted averages include Renfe AVE and Renfe AVLO services.

All data for case studies were collected between January and February 2026. No updates were taken into account after this cutoff date.