

POSITION PAPER

EU Passenger Package: a golden opportunity to maximise green travel

It's clear that ticketing and passenger rights are not working across Europe. The EU Passenger Package creates the biggest opportunity yet to change this, however the EU Passenger Package still falls short of aligning with the EU's climate targets and is not harmonious enough with the EU's rail policy agenda.

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Lead author: Georgia Whitaker georgia.whitaker@transportenvironment.org

Lead analyst: Thomas Enquerez thomas.enriquez@transportenvironment.org

Contributors: Victor Thevenet victor.thevenet@transportenvironment.org

Key data points

Only 53%

Of the 30 most flown routes in the EU can be booked by rail in one go on major operators

Just two

Of these routes would be changed by the current hosting obligation proposals: Barcelona to Paris and Madrid to Porto.

40%

On 40% of the routes T&E investigated, passenger rights were not guaranteed

"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."

The EU Passenger Package is a big leap forward to passenger rights, and presents vast progress in dragging European rail ticketing out of the stone age and helping people switch from cars to trains. However the geographical scope of the proposals is limited in effect to neighbouring countries. This risks limiting the modal shift potential from air to rail, which could hinder the EU meeting its climate targets. [Transport remains](#) the EU's largest source of greenhouse gas emissions, and unlike other sectors, since 1990 these emissions have continued to rise in recent decades. [Aviation](#) is the largest growing source of emissions, and road transport still accounts for the [majority of transport emissions](#) in the EU. Therefore it is crucial to enable the conditions for rail, Europe's greenest mass market transport mode to be maximized in upstream and downstream measures such as the EU Passenger Package.

01 The Hosting Obligation: Article 5 Rail Ticketing Regulation

Align the EU Passenger Package with the High Speed Rail plan

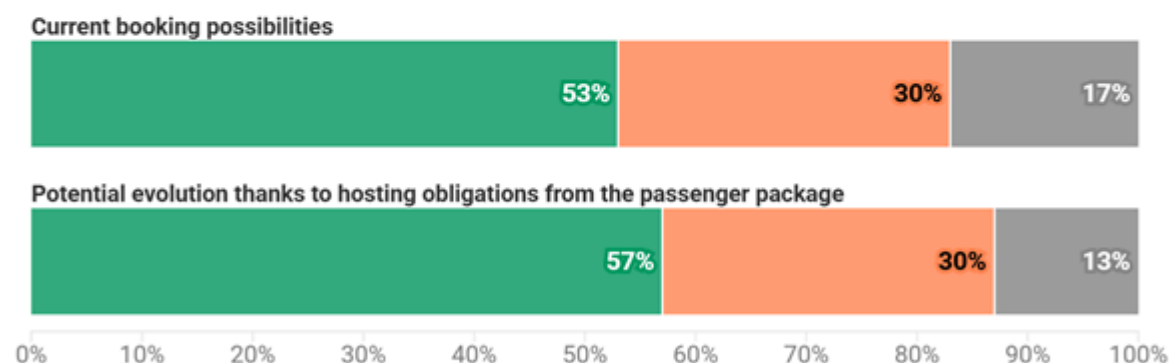
The hosting obligation must complement the EU's broader rail agenda

The Passenger Package would not guarantee passenger rights on nearly half of the rail journeys reviewed

New mandatory requirements on major ticketing platforms will barely change booking possibilities. This will limit access to full passenger rights protection

The journey can be booked in one go on:

- Booking engines from the rail operator of the departing and arriving countries
- Only one booking engine
- None of the booking engines



Source: T&E, OAG • Rail booking possibilities for the 30 most flown EU cross-border air routes where rail equivalent journeys are under 1500 km. Booking projections assume dominant platforms will receive booking requests from other operators and not just display their services



1.1 Hosting obligation: necessary but limited in scope

Expanding the geographical scope for the single ticket, the EU Passenger Package would expand passenger rights and the simplification of booking, making train travel more attractive to passengers. The Commission's current proposal is a good first step towards this. Convenience matters in a modern digital world and the rail sector must keep up. T&E commissioned polling found that [61% of respondents](#) were put off taking long distance journeys at least once because the booking process was too complicated.

Changing major platform practice on ticketing is important. The majority of passengers use incumbent rail operators booking websites. For instance in France, [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.

However, the hosting obligation's international geographical scope is so small that the potential to encourage modal shift from air travel is limited. As our research demonstrates, many of rail equivalent journeys of the most flown routes across the EU will not be bookable with a single ticket, and therefore passengers won't necessarily have passenger rights protected. This makes international rail travel less attractive than alternative flight routes, and limits the success of other flagship EU Rail initiatives such as the High Speed Rail Plan.

The EU must harmonize the EU Passenger Package and High Speed Rail Plan by extending the hosting obligation to capital cities under 1500km with maximum 2 changes, where there is an available rail route. For example Brussels to Madrid would count as one of these routes. SNCF, SNCB and Renfe would all be required to sell this route.

Key recommendation one: expand the hosting obligation to align with the High Speed Rail Plan

- **Expand the geographical scope of hosting obligations on major rail operators' booking platforms to increase the availability of single tickets in line with the High Speed Rail Plan.** This will extend passenger rights and encourage modal shift between the EU's capitals under 1500km.
- **We recommend that EU institutions mandate major operators to sell tickets for journeys between EU capitals in line with the EU High Speed Rail Plan.** This will count for journeys with up to two changes, where there is an alternative rail route under 1500km.
- **The hosting obligation should also include journeys leaving the EU or arriving in the EU when requested.** We also recommend, much like the sharing obligation and aligned with the High Speed Rail Plan, that this includes journeys leaving the EU and arriving in the EU from other capitals.

02 Regulation 2021/782 Article 1 (b) 9a RPRR

Single tickets should be purchasable on a single platform, not just in a single transaction.

2.1 Passengers should be able to add to their existing journey later on the same platform and still keep a single ticket and associated passenger rights

In the context of limited booking horizons, and the reality that operators sell their tickets at different times: some in advance, some with limited notice, this proposal is a sure-fast way of ensuring that multi-operator tickets are genuinely protected as the legislation is intended for.

For this new regulation to fully deliver, its scope needs to be revised to cover passengers who have bought their ticket on one platform, not just those who have bought their tickets in a single

transaction. Otherwise, there is a risk that this new regulation will create different, unequal rights for passengers, depending on where and when they book their tickets.

For example, if someone is travelling from Paris to Madrid, my SNCF ticket might be available six months in advance, but the Renfe ticket for the Barcelona to Madrid ticket may not be ready until five months before the journey (assuming the booking horizon amendments are approved). Passengers should be able to book the entire journey on Trainline, and simply update the ticket when travelling on the same continuous journey over the course of a day or night and maintain their passenger rights, as well as keeping the journey as a single ticket for convenience.

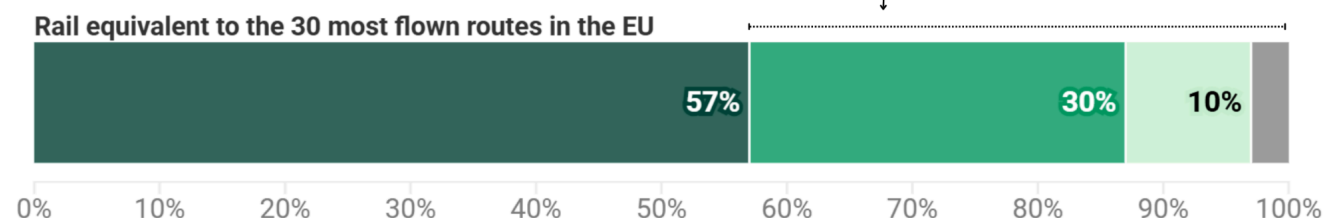
There is a risk that this new regulation will create different, unequal rights for passengers, depending on where they book their tickets.

European rail passengers risk facing unequal rights under the EU Passenger Package

While full rights require a single ticket, not all platforms are mandated to offer them, meaning passenger protection will vary depending on the platform used

Single tickets will potentially be available on:

- Both incumbent operators and independent platform(s)
- Only one incumbent operator and independent platform(s)
- Only independent platform(s)
- No single ticket



Source: T&E • Research performed August 2025 - May 2026, on incumbent operators' booking engines from departing and arriving countries of routes studied and 4 independent platforms



Key recommendation two: passengers should be able to buy a single ticket on one platform, not just in one transaction

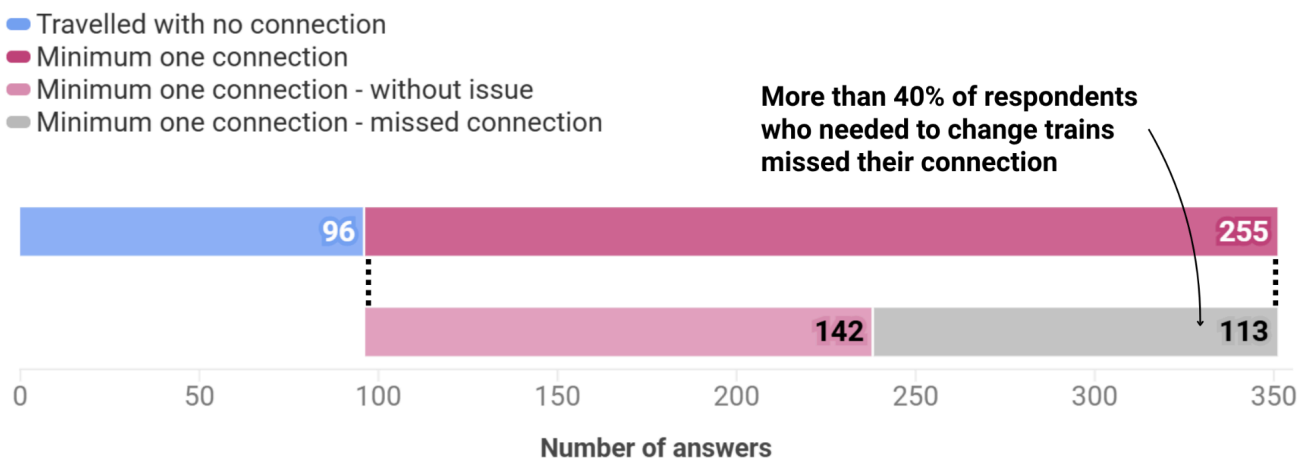
Passengers should be able to hop on whichever train to finish their journey

3.1 If a passenger misses a connection, they should be able to use whichever suitable next train regardless of the railway undertaking.

What is being currently proposed is very similar to the Agreement on Journey Continuation (AJC), although it covers all operators covered in the single ticket purchase. However the next available journey is likely to be operated by a railway undertaking not covered by the single ticket. For example, if the passenger is travelling from Brussels to Milan, and the Brussels to Paris train is late, the passenger should be able to get on the Trenitalia France train to Milan as opposed to waiting another however many hours for the next SNCF to Milan. This would make the journey a lot more convenient for passengers, and may well save money for the operators who would be at risk of having to pay for passengers accommodation should they miss the last train for example.

Changing trains remains a challenge in Europe

A third of respondents missed a connection



Source: T&E, Que Choisir Ensemble • Based on 351 answers from an online call for testimonials



Key recommendation three: when passengers miss a connection, allow passengers to get on whichever next available train connection to finish their journey without a seat reservation

See T&E's previous reports for more information:

- [Modernizing the EU's rail ticketing system](#)
- [Advancing EU rail passenger rights](#)
- [Booking headache deters almost two in three long distance rail travellers](#)

Georgia Whitaker

Rail Campaigns Manager

georgia.whitaker@transportenvironment.org

www.transportenvironment.org | [BlueSky](#) | [LinkedIn](#)
