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Position Paper: EU Rules on multimodal digital mobility services and single digital booking & ticketing

Business & Science Poland

Background

The European Commission has put forward two complementary legislative proposals aimed at establishing a coherent regulatory framework for multimodal digital mobility services within the European Union. The initiatives seek to enhance the functioning of the digital ticketing market by improving transparency, ensuring fair and non-discriminatory access to transport data and ticket distribution, and fostering effective competition among transport operators and digital mobility platforms. The proposed Regulation on Multimodal Booking introduces a horizontal framework governing multimodal digital booking services, and the proposed Regulation on Rail Ticketing establishes sector-specific obligations to improve the availability, accessibility and distribution of rail tickets, with particular emphasis on cross-border and multi-operator journeys. The proposals aim to address structural barriers to seamless multimodal travel, support the completion of the Single European Transport Area, and facilitate a modal shift towards more sustainable transport.

BSP Position

Business & Science Poland (BSP) welcomes the European Commission's Passenger Package and supports its objective of improving the accessibility, transparency and integration of rail passenger services across the European Union. The proposed measures represent an important step towards facilitating journeys involving multiple railway operators, strengthening the Single European Railway Area and improving the passenger experience through enhanced ticket availability and distribution.

BSP considers the proposed Rail Ticketing Regulation and the Regulation on Multimodal Booking as important building blocks for the development of an integrated European mobility ecosystem. Simultaneously, the current proposals should be regarded as an intermediate step rather than the final stage of multimodal integration. On the one hand, they significantly improve interoperability within the rail sector, on the other, they do not yet establish a comprehensive framework enabling seamless multimodal journeys across different transport modes, including aviation.

In the longer term, BSP believes that the European regulatory framework should facilitate the development of integrated air-rail mobility solutions, allowing passengers to plan, book and complete multimodal journeys through a single, user-friendly booking process while ensuring appropriate consumer protection and fair market conditions.

Key recommendations

- **Ensure proportionate implementation** – taking into account the technical, operational and administrative challenges faced by railway undertakings, ticket vendors and multimodal mobility service providers.
- **Promote digital interoperability** – supporting investment in common standards, real-time data exchange and interoperable digital infrastructure across the European transport sector.
- **Strengthen legal certainty and consumer transparency** – ensuring that passengers clearly understand the distinction between journeys booked under a single transport contract and those booked under separate transport contracts, together with the corresponding rights and liabilities.
- **Maintain a long-term vision for multimodal integration** – recognising that future policy development should facilitate the voluntary integration of rail and aviation services in support of seamless, sustainable and passenger-centered travel experience across Europe.

Detailed recommendations

1. Ensure practical and proportionate implementation

BSP supports the objectives of the proposed framework but emphasises that its successful implementation will depend on realistic implementation timelines and continuous dialogue with transport operators, distribution platforms and other stakeholders. The proposed obligations regarding data sharing, ticket distribution and commercial cooperation will require significant organisational, technical and financial resources. Specifically, ensuring real-time exchange of operational information, including schedules, delays, cancellations and seat availability will require continued investment in interoperable digital systems and common technical standards throughout the European transport sector. In addition, mandatory commercial agreements between transport operators and ticket vendors should be implemented in a proportionate manner that limits unnecessary administrative burdens, particularly for smaller market participants.

2. Promote digital interoperability across transport modes

The proposed framework creates an opportunity to accelerate digital integration within European passenger transport. BSP encourages the Commission to continue supporting the development of interoperable data standards and digital infrastructure that facilitate efficient ticket distribution while ensuring fair competition between market participants. At the same time, experience from sectors where integrated ticketing and passenger information systems are already well established, including aviation, may provide valuable operational insights that could support the effective implementation of the new framework.

3. Strengthen passenger transparency and legal certainty

The distinction between journeys covered by a single transport contract and those consisting of separate tickets may not always be apparent to passengers. Without clear communication, travellers may incorrectly assume that equivalent rights apply in cases of missed connections, rerouting or compensation. To avoid misunderstandings and maintain consumer confidence, the final legislation should require clear, consistent and easily understandable information throughout the booking process, enabling passengers to make informed purchasing decisions before concluding their travel arrangements.

4. Maintain a long-term vision for integrated multimodal mobility

While the proposed measures significantly improve the framework for digital booking services and rail ticketing, they should be viewed as part of a broader transition towards genuinely seamless multimodal mobility. The successful implementation of the proposed framework has the potential to build the operational experience, digital interoperability and market confidence necessary to facilitate closer cooperation between rail and aviation. By combining strategic infrastructure investment with an enabling regulatory framework and the effective implementation of integrated ticketing solutions, the European Union can create the conditions for a truly integrated transport system. In such a system, major multimodal hubs can serve as key gateways connecting national, regional and European mobility networks. This would maximise the value of investments in both High-Speed Rail and airport infrastructure while contributing to seamless, sustainable and passenger-centred mobility across Europe.

About BSP

Business & Science Poland (BSP) is the largest Brussels-based association representing Polish companies from various sectors in discussions with EU institutions. It bridges the experience of leading Polish enterprises with the EU agenda. BSP represents the expertise and interests of Polish companies employing over 280,000 people in Poland, across the EU, and globally. The main objective of BSP is to strengthen the representation of Polish economic interests and ensure that EU legislation takes into account the specific circumstances and needs of the Polish economy