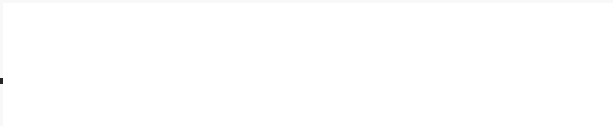


eu travel tech

Unlocking Europe by Rail: How the EU Can Solve Ticketing Challenges

Transport Ticketing Global

March 2025



The European association of travel platforms

eu travel tech was established in 2009 as a dedicated organization to represent and promote the interests of travel technology companies in the EU.

We work collaboratively with industry stakeholders and policymakers towards the common goal of **fostering a consumer-driven, innovative, and competitive travel and tourism industry that embraces digitization, transparency, and sustainability.**

Full Members



Associate Members



Strategic Partners





Commitments – Transport ticketing

“You will prepare a proposal for a **Single Digital Booking and Ticketing Regulation** to ensure that Europeans can buy one single ticket on one single platform and benefit from passenger rights protection for their whole trip.”

President von der Leyen’s Mission letter for Commissioner Tzitzikostas, 2024

“I will also have the **multimodal initiative** [...], meaning you will be able to have **single ticketing for different modes**, for example using an airplane on one leg of your trip and a **train for the second leg**”

Commissioner Tzitzikostas at his confirmation hearing, 2024

Multimodality in Europe – The Problem

Case study: Brussels - Graz



Single-mode trip:

Brussels - Frankfurt (air)
Frankfurt – Graz (air)

Price: EUR 128

Duration: 4:30 h (+ transfer)

Emissions: 181 kg CO₂



- Highly visible
- Easily searchable, bookable, payable
- Indirect channels impacted by unfair practices (e.g. withholding cheapest options)

Multimodal trip:

Brussels – Vienna (air)
Vienna – Graz (rail)

Price: EUR 76 (61 air + rail)

Duration: 6:00 h

Emissions: 119 kg CO₂ (107 + 12)



- Invisible to travelers
- Not easily searchable, comparable, bookable, payable
- Lack of content access and unfair practices preventing fair competition and combination of modes

Different modes – similar problems

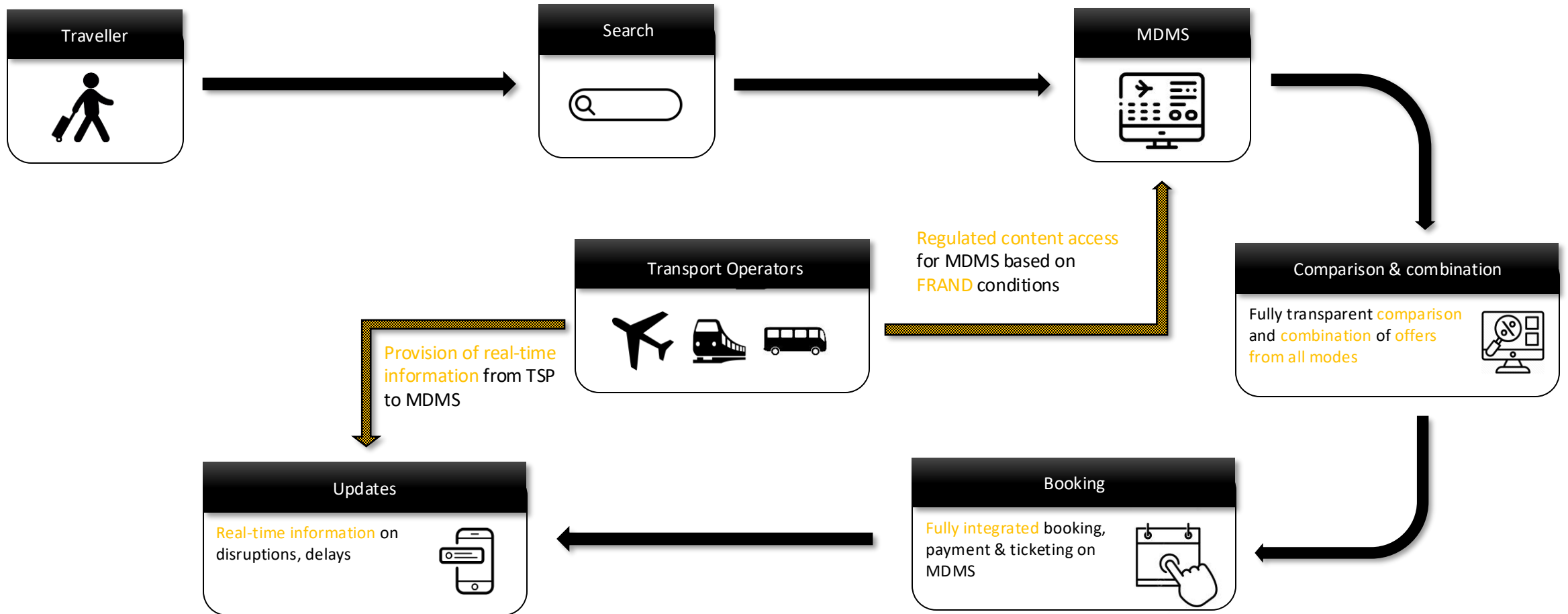
Example air transport: AGCM investigation against Ryanair

- Investigating authority: Italian Competition Authority
- Legal basis: Art. 102 TFEU (abuse of dominant position)
- Subject: Ryanair
- Alleged abusive conduct (i.a.):
 - Refusal to enter into distribution agreements with online travel agents (e.g. eDreams)
 - Providing discriminatory offers to indirect distributors
- Competitive and consumer impact:
 - Reduced consumer choice due to lack of intra-brand competition and combination options
 - Strengthening of Ryanair's dominant position

Example rail transport: BKartA investigation against Deutsche Bahn

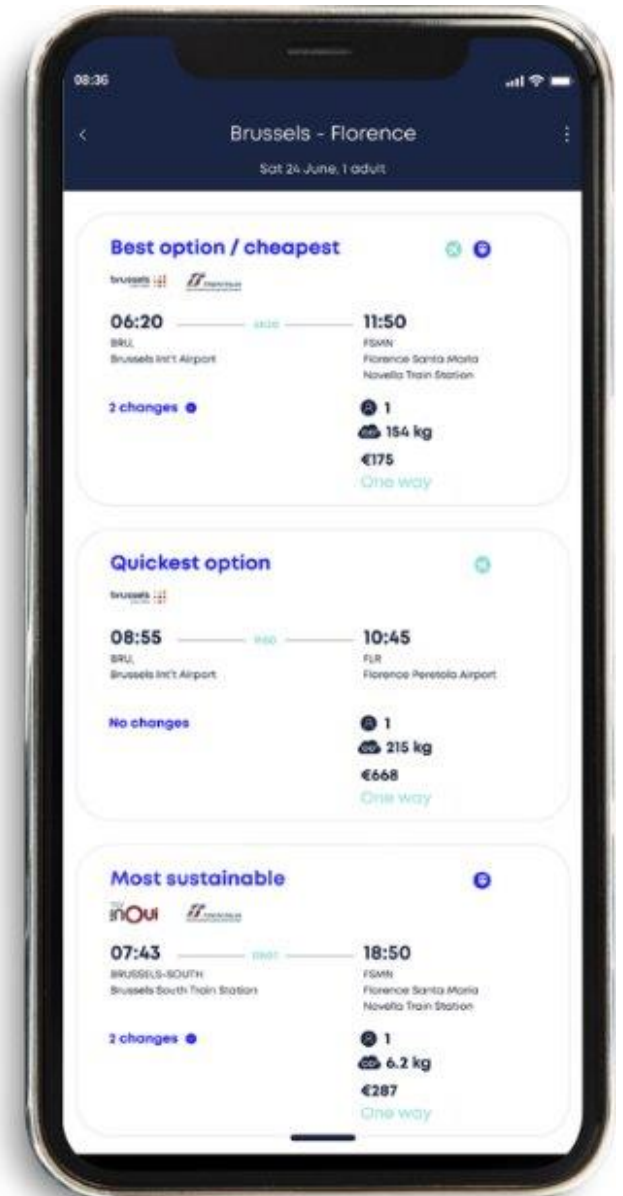
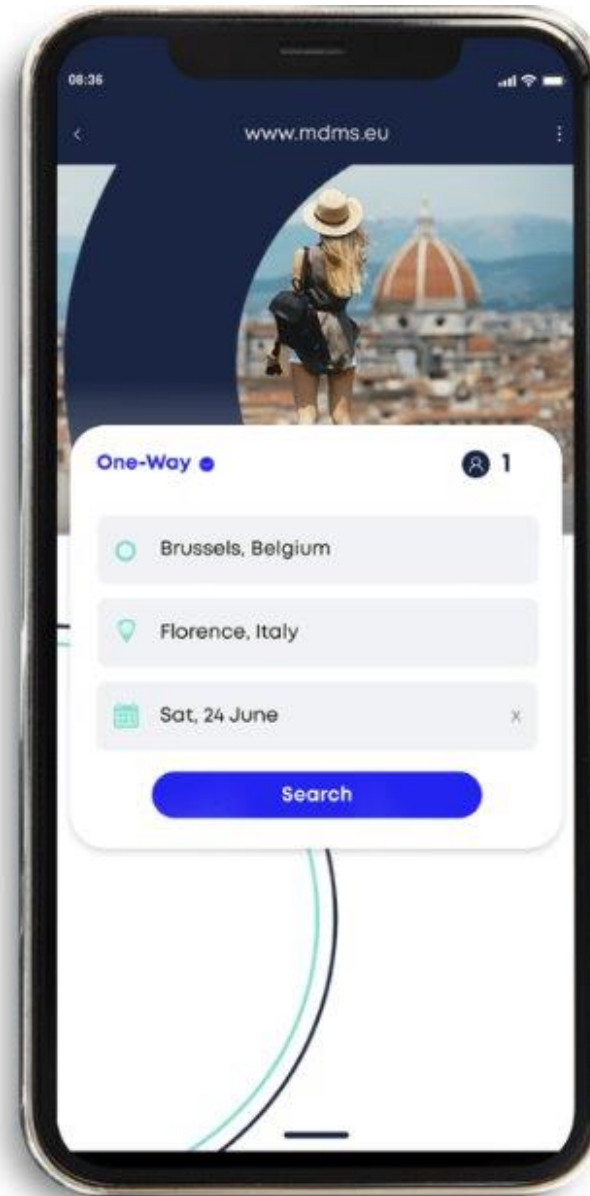
- Investigating authority: German Competition Authority
- Legal basis: Art. 102 TFEU (abuse of dominant position)
- Subject: Deutsche Bahn
- Alleged abusive conduct (i.a.):
 - Refusal to enter into distribution agreements with online travel agents (e.g. Trainline)
 - Providing discriminatory offers to indirect distributors
- Competitive and consumer impact:
 - Reduced consumer choice due to lack of intra-brand competition and combination options
 - Strengthening of Deutsche Bahn's dominant position

Multimodality in Europe – The Vision



Consumer experience facilitated by EU ticketing policy

A new EU Regulation, the **Multimodal Digital Mobility Services (MDMS) Regulation**, could provide you with the full range of transport options when booking travel



Example eDreams - Search "Flights" on a Spanish route where high-speed rail is available

The screenshot shows the eDreams website interface. At the top, there is a navigation bar with the eDreams logo and menu items: Vuelos, Hoteles, Vuelo + Hotel, and Otros. On the right side of the navigation bar, there are links for 'Gestionar reserva', 'Mi cuenta | Mi Prime', '¿Te podemos ayudar?', and a language/currency selector for 'ES (€)'. Below the navigation bar is a large banner image of a man and a woman standing by a car on a beach. Overlaid on this banner is a search form. The search form includes a header 'Busca. Reserva. Viaja.' and a green badge that says 'Ahorra hasta un 40 %'. The search form has four main categories: 'Vuelos' (selected), 'Hoteles', 'Vuelo + Hotel', and 'Coches alquiler'. Below these are options for 'Ida y vuelta' (selected), 'Solo ida', 'Múltiples destinos', 'Turista', and 'Vuelos directos'. The search parameters are: Origin: Madrid, Destination: Barcelona, Departure date: Sab, 28/09, Return date: Lun, 30/09, and Number of travelers: 1 viajero. There are two search buttons: 'Buscar Vuelo + Hotel' and 'Buscar vuelos'. Below the search form is a promotional banner for 'Alquiler de coche con cancelación gratuita' with a 'Reserva ya' button. At the bottom right, there is a vertical 'Comentarios' button.

Busca. Reserva. Viaja.

Ahorra hasta un 40 %

Vuelos Hoteles Vuelo + Hotel Coches alquiler

Ida y vuelta Solo ida Múltiples destinos Turista Vuelos directos

Madrid Barcelona Sab, 28/09 Lun, 30/09 1 viajero

Buscar Vuelo + Hotel Buscar vuelos

Alquiler de coche con cancelación gratuita Reserva ya

Comentarios

Example eDreams - Search "Flights" on a Spanish route where high-speed rail is available

Escalas [Ver todas](#)

Modo de transporte

✕ Vuelos

🚂 Trenes

Horas

Madrid a Barcelona

00:00 23:59

Barcelona a Madrid

✕ Resumen de tu viaje

Itinerario: tren

Ida ⌚ 3 h 14 min

19:30 28 sep **Madrid Atocha**
Madrid (España)
renfe Renfe 4R06309
⌚ 3 h 14 min 🚂 tren 🚶 Turista

22:44 28 sep **Barcelona Sants**
Barcelona (España)

Maleta facturada incluida

Vuelta ⌚ 2 h 30 min

21:25 30 sep **Barcelona Sants**
Barcelona (España)
renfe Renfe 4R03610
⌚ 2 h 30 min 🚂 tren 🚶 Turista

23:55 30 sep **Madrid Atocha**
Madrid (España)

Maleta facturada incluida

✕ Resumen de tu viaje

Itinerario: vuelo

Ida ⌚ 1 h 25 min

07:30 28 sep **Adolfo Suárez Madrid - Barajas, T2**
Madrid (España)
Air Europa UX7701
⌚ 1 h 25 min ✈️ 789 🚶 Turista

08:55 28 sep **El Prat, T1**
Barcelona (España)

Equipaje de mano

Vuelta ⌚ 1 h 25 min

18:55 30 sep **El Prat**
Barcelona (España)
Iberia IB3033
⌚ 1 h 25 min 🚶 Turista

20:20 30 sep **Adolfo Suárez Madrid - Barajas**
Madrid (España)

Equipaje de mano

Direction of travel

Facilitating multimodal travel by
regulating a single mode of
transport?

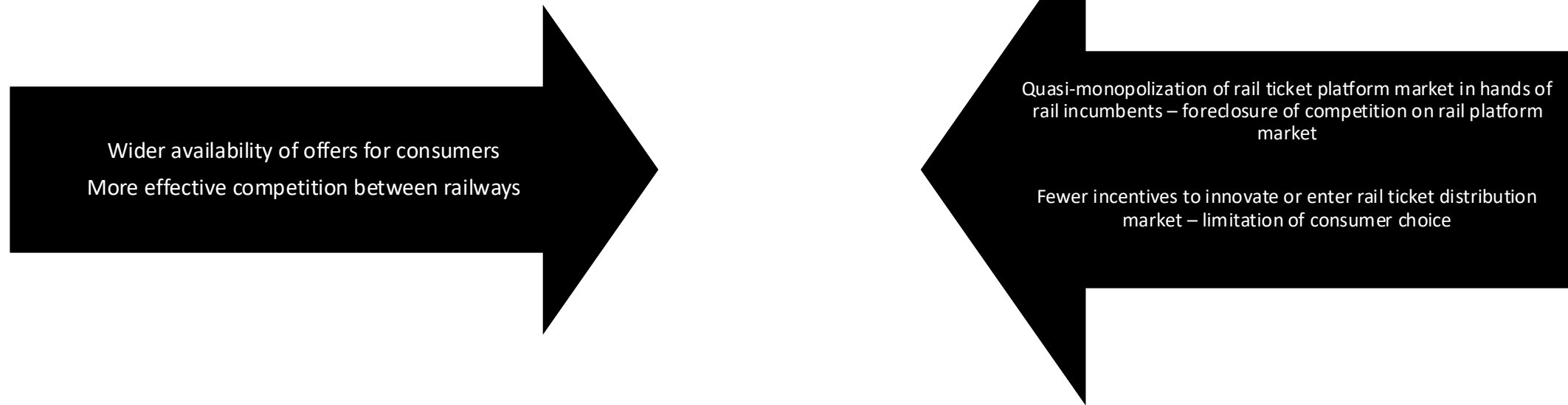
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“All Tickets on All Platforms”

Policy measure considered by the EC :

- Obliging dominant railways’ integrated sales channels to distribute services of smaller rivals



“All tickets on all platforms” forces direct trade-off between competition in ticket distribution and competition in passenger rail services.

Multimodality in Europe – The Solution

1. **Access to content** of indispensable transport operators is the fundamental precondition for multimodal platforms to be able to transparently distribute all modes of transport and play their role as modal shift enablers.
2. Multimodal platforms must be enabled by law to distribute transport services of all indispensable operators under “**fair, reasonable and non-discriminatory (FRAND)**” **distribution agreements** providing a level playing field.
3. Such obligations and rights must be supported by a strong enforcement framework: designated enforcement authorities, clear procedural framework.

Thank you!


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