





Key EU Passenger Rights Initiatives: Multimodal Journeys and the Revision of the Rail PRR on Single Tickets

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Overview



The draft MM PRR



Update on „Enforcement Omnibus“



New proposal: Passenger Package

Proposal on passenger rights in the context of multimodal journeys (“MM PRR”)



- Main goal: Establish **new rights** for passengers using a combination of **different modes of transport**
- Should apply **in addition to the different EU Passenger Rights** Regulations already in place for each mode of transport (plane, bus, train and ship).
- Rail Passenger Rights Regulation of 2021 served partly as “model”; however, now in the context of a single/combined or separate multimodal ticket (contract).

The scope of application according to the MM PRR draft text

- The Regulation would apply to multimodal journeys offered by carriers or intermediaries to passengers in the form of:

(a)

A single multimodal contract

(b)

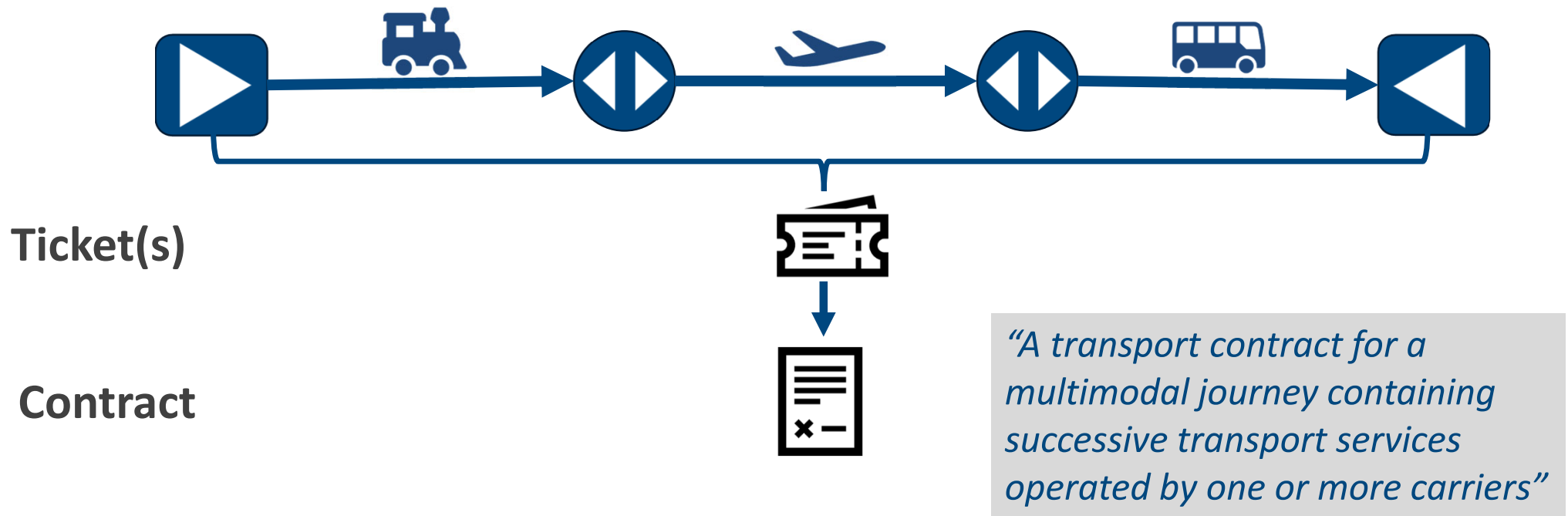
A combined multimodal ticket

(c)

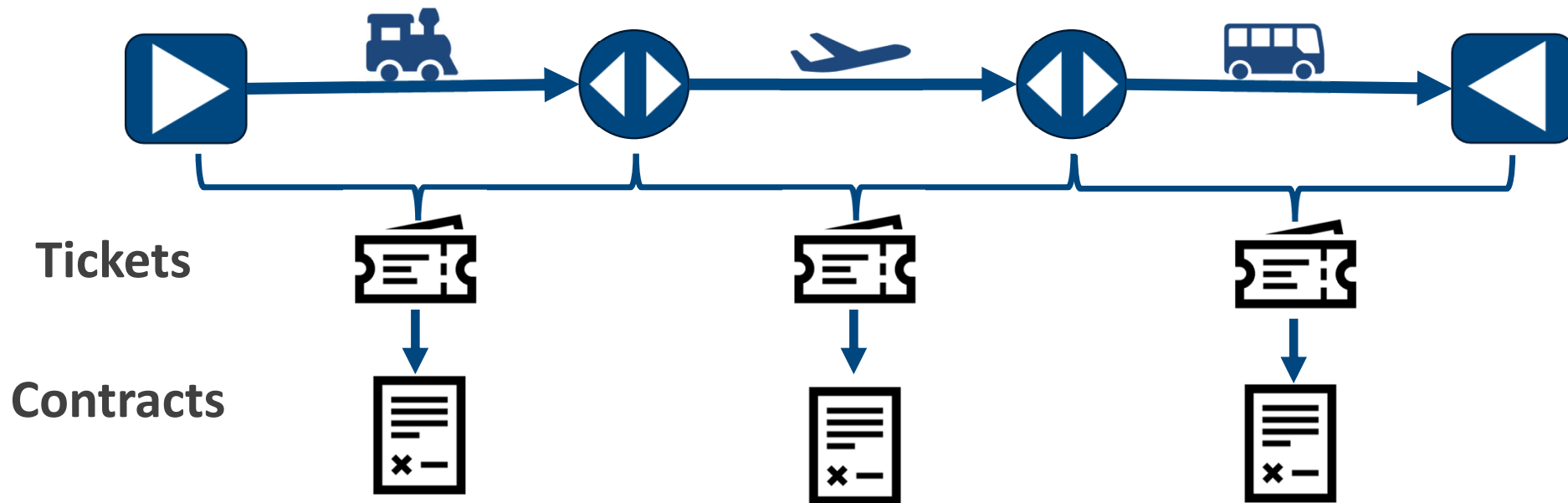
Separate multimodal tickets

- For the **definition of “carrier”**, the MM PRR refers to the individual passenger rights regulations for each mode of transport (plane, bus, train, ship).

Multimodal journeys under a single transport contract

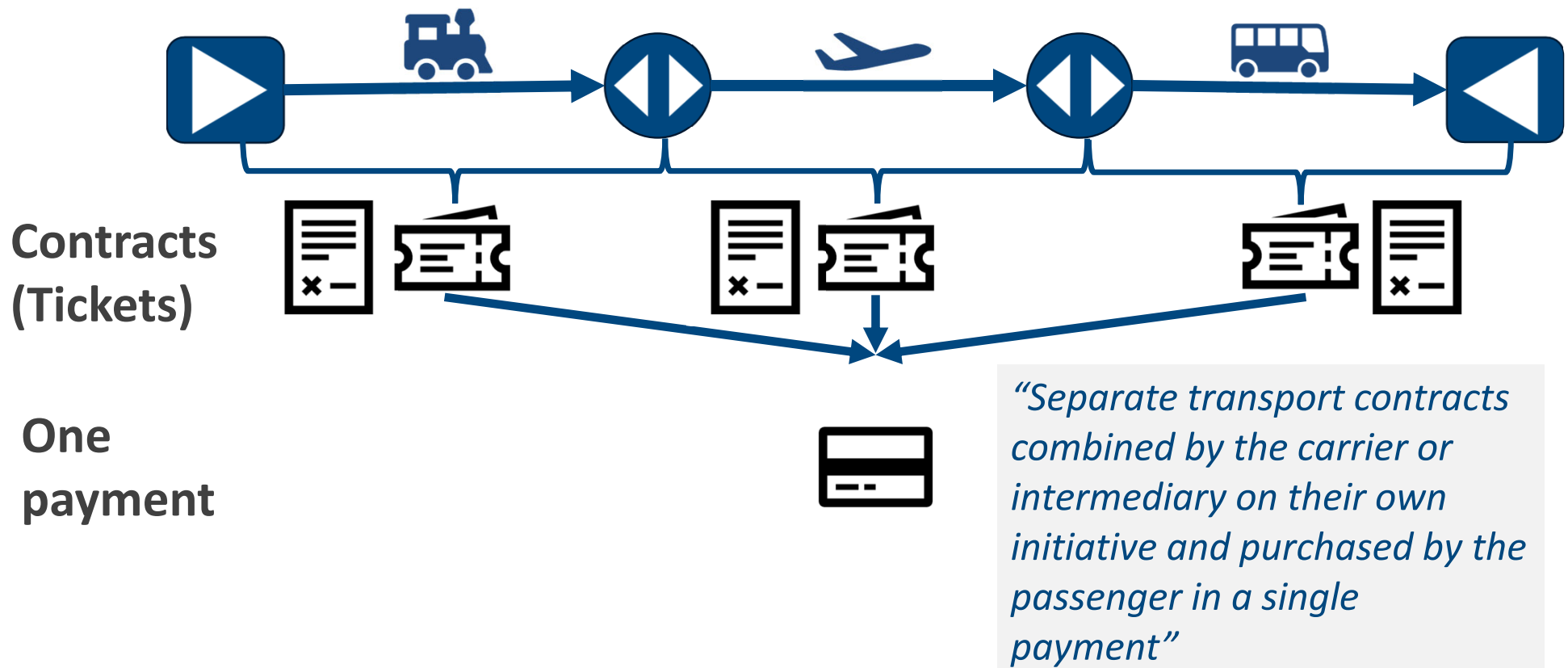


Multimodal journeys under separate multimodal tickets



*“tickets for a multimodal journey representing **separate transport contracts** which are **offered together** by the carrier/intermediary but which the passenger purchases by means of **separate payments**”*

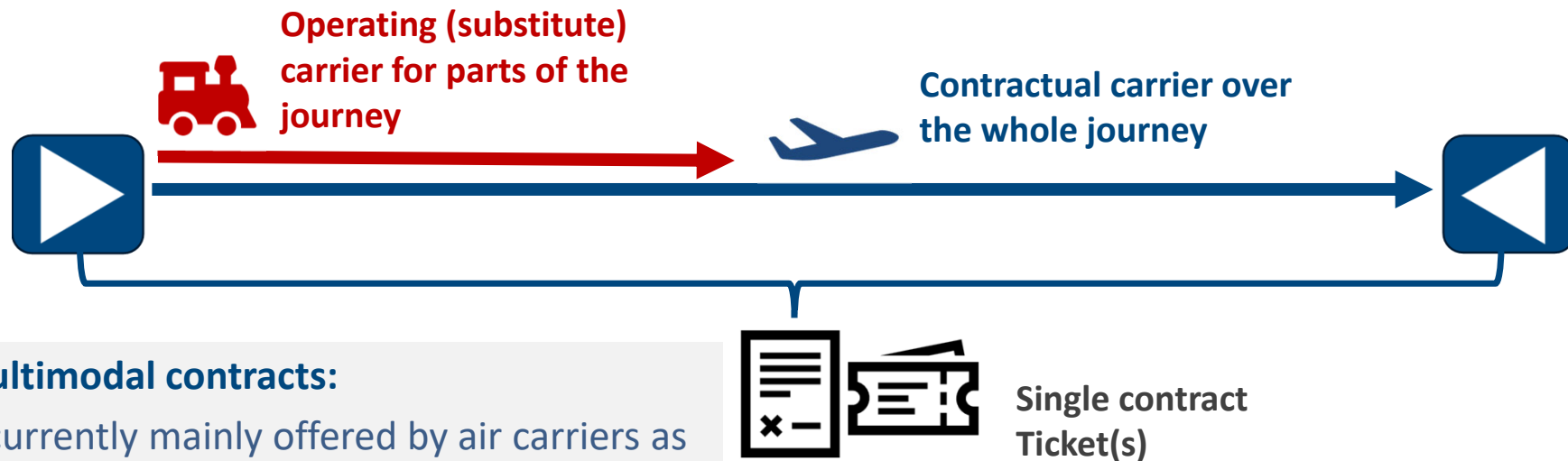
Multimodal journeys under a combined multimodal ticket



Overview of obligations under the different contract types

	Single multimodal contract	Combined multimodal ticket	Separate multimodal ticket
Pre-purchase information	✓	✓	✓
Real-time information	✓	✓	✗
Set of passenger rights (reimbursement and re-routing, assistance) Responsibility: contracting carrier	✓	✗	✗
Information on separate nature of tickets	✗	✓	✗
Single point of contact to assist PRMs	✓	✓	✓
Complaint-handling by industry and NEBs	✓	✓	✓

Ambiguities: what about this single contract situation?



Single multimodal contracts:

- Are currently mainly offered by air carriers as leading partner
- railway undertakings only act as substitute carrier;
- the legal regime of air carriage applies to the whole journey
- Will this change in the future?

Ambiguities: the carrier definition and related responsibilities

- The MM PRR contains **no uniform carrier definition**: obligations apply to “carriers”, but each mode of transport defines the carrier in its own regulation.
- Additional terms used under the MM PRR such as “contracting carrier” or “operating carrier” create further ambiguity.

CER proposal supported by CIT – “carrier” means:

- a natural or legal person **on behalf of whom a contract of carriage has been concluded**.
- This applies irrespective of whether the carriage is actually performed by that carrier or by a substitute or operating carrier.
- In cases of a through contract of carriage, several carriers may cooperate as successive carriers.
- Each carrier is only responsible for its own part of the journey.

Status of MM PRR discussions at EU level

- **Discussions to be continued under the Irish Presidency of the Council of the EU**
- **Council and Parliament have already drafted their positions**
- **Council:**
 - Exclusion of separate multimodal tickets
 - Recognised assistance dogs added to the definitions
- **Parliament:**
 - More extensive information requirements towards passengers
 - Passengers actively provided with a claim form where passenger rights apply



“Enforcement Omnibus” Regulation – impacts on Rail PRR

Scope: Enforcement of passenger rights

Concerns amendments to all passenger rights (air, bus, rail, ship)

Status: Final provisional agreement reached at EU level on 25 June 2026

Amendments shall enter into force jointly with revised Regulation on Air Passenger Rights, i.e. **12 months after publication** in the Official Journal of the European Union.

Rail PRR – key future changes

New definitions of “recognised assistance dog” and “accessible format”

Extraordinary circumstances: explanation to passengers and information to NEBs upon request

New Art. 30a – written electronic correspondence (incl. date/time) must be provided in a form passengers can keep for future reference

Passenger Package – new proposal of the European Commission

In May, the European Commission published its “Passenger Package”, comprising three proposals:

- “Targeted” revision of the Rail PRR 2021
- Rail Ticketing Regulation (RTR)
- Multimodal Booking Regulation

→ CIT focuses on the Rail PRR and the parts of the RTR that concern CIT products

→ The Passenger Package would have a significant impact on carriers.

→ EU institutions have started to discuss the proposals



Main points of the targeted Rail PRR “single ticket” proposal

- New definition of “*single ticket*” under which all passenger rights should in principle be covered (Article 3)

*“valid evidence, regardless of its form, of a **through-ticket** or of the conclusion of **two or more transport contracts for a single journey purchased in a single commercial transaction** from a railway undertaking, ticket vendor or tour operator.”*



- Full replacement of the current “*through-ticket*” concept with “*tickets for journeys including one or more connections*” (Article 12)
- Revised compensation rule: compensation over the whole single ticket if the passenger’s journey is up to 12 hours.

The single ticket proposal would have far-reaching impacts

Scope of passengers rights

- Existing obligations for **through-tickets** remain in place
- Rights extended to journeys with several RUs sold as a **“single ticket”**:
 - assistance
 - reimbursement and re-routing
 - compensation (conditions apply above 12 hours journey time)

Liability

- The RU that causes the missed connection is liable for the full journey (possible exclusion if minimum connection time was not respected)
- **“AJC”** rule written into the legislation

Distribution

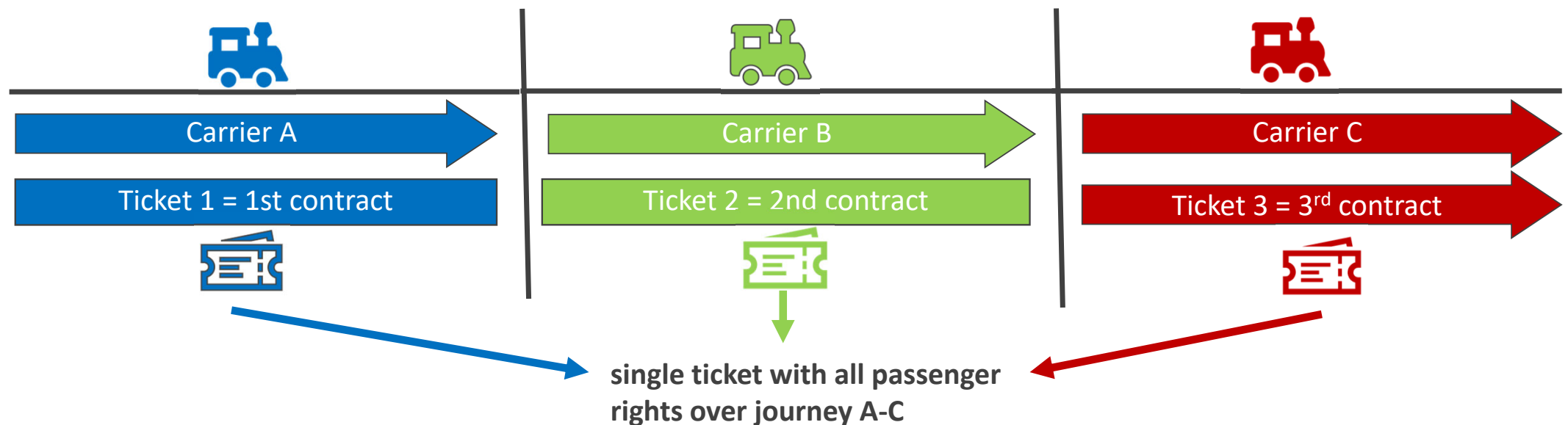
- RUs, ticket vendors and tour operators may no longer split journeys into separate tickets on their platforms
- Adherence to **minimum connection time** according TEL TSI is a requirement when selling single tickets

Interaction with the Rail Ticketing Regulation

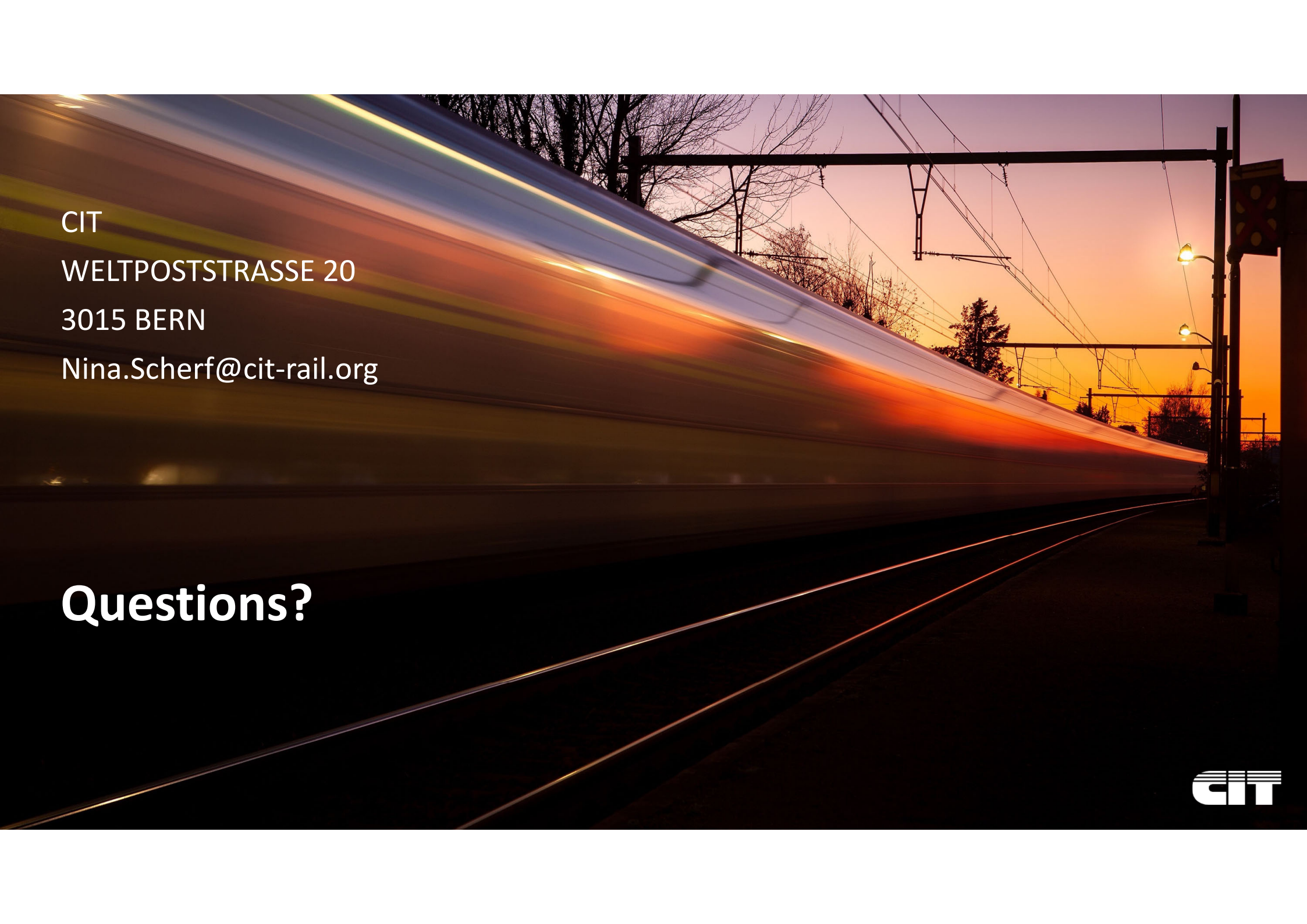
- Ticket vendors may combine rail products and sell them as a **single ticket**, where **minimum connection times** are respected

The single ticket proposal is a fundamental change of concept

It introduces a fundamental shift from “through-tickets” (one contract) to “single ticket” (several contracts) protection of passengers.



The transport contract as a basis for rail transport and passenger protection is replaced by a protection over the passenger's whole journey under a single ticket.



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Questions?



Annex: carrier definition – changes proposed by CIT and CER

Proposal in the draft MM PRR

Article 3 Definitions

(2) ‘**carrier**’ means a natural or legal person, other than an intermediary, offering transport services to the general public, including:

(...)

(b) **railway undertakings as defined in point (1) of Article 3 of Regulation (EU) 2021/782;**

(...)

(3) ‘**ticket vendor**’ means any natural or legal person, other than a carrier, acting on behalf of a carrier or a passenger for the conclusion of transport contracts;

Proposed changes by CIT and CER

Article 3 Definitions

(2) ‘carrier’ means a private or public legal entity, offering transport services to the general public and, including **on behalf of whom a contract of carriage has been concluded**, irrespective of whether the carriage is actually performed by that carrier or by a substitute or operating carrier; in cases of a single multimodal contract **several carriers may co-operate as successive carriers, every carrier being responsible for its part [leg] of the journey only**, including;

(b) **carriers as defined in article 3 (a) of the Annex I to Regulation (EU) 2021/782;**

(3) ‘**ticket vendor**’ means any natural or legal person, acting on behalf of one or more carriers for the conclusion of transport contracts with passengers; **a carrier can also act as a ticket vendor for its own and/or other carriers’ transport services;**