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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Transport - Intermodal Questions and Networks
Subject:	Compilation of MS submitted Horizontal and Digital questions– Intermodal WP 16.07.2026

Delegations will find attached a compilation of the questions submitted by MS on the above subject.

Intermodal Working Party 16 July 2026

Interlinkages across Passenger package and with other relevant Union legislation

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1. Horizontal questions across Passenger package proposals

Interactions between RMB, RTR and RPRR

Q1. How to ensure streamlining with the Proposal on Multimodal Passenger Rights (2023/0436), given that the definitions in the RTR are streamlined with the Rail Passenger Rights Regulation as well? In general, the RTR/RPRR and RMB use different definitions for the same concepts, while both addressing the same market and partly the same entities. Can the EC explain the need for clearly distinguishing these definitions from the other proposal? (NL)

Q2. Has the Commission considered introducing transitional periods or a phased implementation approach for the obligations and passenger rights provided for in the three proposals, in order to facilitate compliance by the operators concerned and ensure an effective and proportionate implementation of the new framework? (IT)

Q3. How does the Commission envisage ensuring consistency between the proposed rules on ticketing, multimodal services and passenger rights, on the one hand, and the existing EU framework governing transport interoperability and operational management systems, on the other? In particular, how will the proposed framework take into account the need to ensure, within reasonable operational margins, the reliability of connections, timetables and planned service levels underlying integrated and multimodal travel offers? (IT)

Q4. The regulations use the term "ticket" in different contexts and contain different definitions of the term "ticket".

- Rail Ticketing Regulation:
  - ‘ticket’ means a ticket as defined in Article 3, point (7), of Regulation (EU) 2021/782 of the European Parliament and of the Council;
- Regulation amending the Rail Passenger Rights Regulation:
  - ‘through-ticket’ means a ticket or tickets representing a transport contract for successive railway services operated by one or more railway undertakings;’;
  - ‘single ticket’ means valid evidence, regardless of its form, of a through-ticket or of the conclusion of two or more transport contracts for a journey purchased in a single commercial transaction from a railway undertaking, ticket vendor or tour operator;’;“
- Multimodal booking Regulation:
  - ‘ticket’ means valid evidence of the purchase of a transport product;

Do you see/expect problems with the application? How should these problems be dealt with? How can they be avoided? (DE)

Q5. Recital (11) Here, a term ('single tickets') to be introduced in Regulation 2021/782 (Rail Passenger Rights Regulation) as part of the Passenger Package is used. What is the relationship between the different Regulations that form the Passenger Package? Is each (combined) ticket under the Rail Ticketing Regulation automatically a single ticket? (DE)

Q6. Although the three regulations operate in similar contexts the proposals introduce a number of new terms which leads, in part, to an inconsistent use of terms in the passenger package and passenger rights legislation. Do you see problems with the application and if so, how can they be addressed? (DE)

Example 1:

- "railway service providers" (Rail Ticketing Regulation)
- "railway undertaking" (Rail Passenger Rights Regulation)
- "transport operators" (multimodal-booking-Regulation)

Why did the Commission choose to introduce the new term "railway service provider" instead of sticking to the well-established term "railway undertakings"?

Interactions between the RTR and RPRR

Q7. How does this Regulation articulate clearly with the proposed revision of the rail passenger rights Regulation, notably regarding liability for missed connections on a single ticket combining products from different operators? Are the two texts fully consistent with one another? (BE)

Q8. It is essential that the transport operator is aware of any previous or subsequent legs of the journey. However, MDMS providers are not obliged to pass that information to transport operators. Why is this obligation not included? (CZ)

Interactions between RMB and RTR

Q9. Can the EC elaborate on the choice to use the definition of "B2C and B2B MDMS" in this proposal, while choosing the definition of "online ticketing service providers" in the RTR, given that these definitions may partly encapsulate the same entities in practice? (NL)

Q10. Why the choice to use "distribution" and "re-linking" in the RMB, while using "reselling" and "re-linking" in the RTR? (NL)

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2. INTERACTIONS WITH HORIZONTAL DIGITAL FRAMEWORK

Q1: BE: *Significant market presence resembles concepts used under the DMA, yet the proposal creates a separate designation process* ***BE:*** *Possible overlap: Strong overlap with competition law and potentially with the DMA's fairness obligations. The FRAND concept is used without a detailed methodology, unlike in some telecommunications and digital-market legislation. How will Article 5 interact with competition-law assessments under Articles 101 and 102 TFEU?*

Q2: BE: *Potential overlap with the Digital Services Act (DSA), Digital Markets Act (DMA), and Regulation (EU) 2019/1150 (P2B Regulation), because the proposal regulates ranking, transparency, and business-user treatment.* ***The exact division of competences should be clarified.*** ***BE:*** *What is the precise boundary between a "multimodal digital mobility service" covered by this Regulation and other online intermediation services already regulated under the Digital Services Act and Platform-to-Business Regulation?*

Q3: FR : *Article 7(4), on the transparency of the criteria for ranking the display of transport products: these criteria are listed in paragraph 5 of the same Article. Why does the text not use the more detailed and already established transparency standard of Article 5 of Regulation (EU) 2019/1150 on fairness and transparency for online intermediation services, which requires online intermediation service providers to ensure transparency regarding ranking parameters, instead of the more general wording used in Article 7(4)?*

Q4: BE*: Possible overlap: Potential overlap with the GDPR and Data Act on Art.8*

Q5: BE: *The proposal repeatedly states that it is "without prejudice" to the DSA, DMA, competition law, the proposed Rail Ticketing Regulation, the Data Act and other information-society legislation, but it does not establish a detailed* ***hierarchy of norms*** *or enforcement coordination mechanism. It is an important issue for legislators to clarify during negotiations.*