



Council of the European Union  
General Secretariat

Brussels, 06 February 2026

---

---

**Interinstitutional files:  
2023/0437 (COD)**

---

---

WK 1297/2026 ADD 2

**LIMITE**

**TRANS  
CODEC**

*This is a paper intended for a specific community of recipients. Handling and further distribution are under the sole responsibility of community members.*

## WORKING DOCUMENT

---

From:	General Secretariat of the Council
To:	Working Party on Transport - Intermodal Questions and Networks

---

N° prev. doc.:	WK 798 2026 INIT
N° Cion doc.:	ST 16284 2023 INIT + ADD 1

---

Subject:	Proposal for a Regulation of the European Parliament and of the Council amending Regulations (EC) No 261/2004, (EC) No 1107/2006, (EU) No 1177/2010, (EU) No 181/2011 and (EU) 2021/782 as regards enforcement of passenger rights in the Union - Presidency non-paper - Comments from Finland
----------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

---

Delegates will find attached comments from **Finland** on the subject above.



# Finland's written comments on enforcement of passenger rights

## Service quality standards

As mentioned in the non-paper, we see that evaluating the possible impacts of SQS in rail sector first before introducing new legislation would be ideal. We could still have some flexibility in the matter of SQS, especially if the smallest entities are left out of the Regulation, and the items of reporting are carefully analyzed. We are not certain about the logic of establishing certain service quality standards. Some items in the Annex do not seem something where the carrier could set up their own standard, like "Information on safety provisions and restrictions applied" or cancellations caused by weather conditions, for example.

## Aviation

It is important to note that currently there are no obligations for airport managing bodies in **Regulation 261**, only in air PRM Regulation. In the ongoing 261 file, some new obligations are possibly added. However, according to the definition the service quality standards would be "based on the relevant items listed in Annex II, **which are under their direct responsibility**". We are not certain which of the items listed here would be under the direct responsibility of the airport managing body. It needs to be carefully considered whether it is necessary to oblige airport managing bodies here at all.

## Maritime & water

100 000 passengers during a year is not a high number if there are carriers who operate several small ferry services across the country. The information required in the annex is not necessarily something those actors have readily available.

## Bus and coach regulation

Now, when we look at the Scope, it seems that SQS's would also apply to where the scheduled distance of the service is 250 km or less. In our opinion, this should not be the case.

## Technical note

There seems to be some repetition in the line 97 (making publicly available).