Council of the European Union
General Secretariat

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Interinstitutional files:
2026/0113 (COD)
2026/0114 (COD)
2026/0115 (COD)

Brussels, 03 July 2026

WK 9846/2026 INIT

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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Transport - Intermodal Questions and Networks
Subject:	Passenger Package questions from Finland– Intermodal WP 09.07.2026

Delegations will find attached the written questions from **Finland** on the above subject.

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Passenger Package questions from FINLAND

- Rail Ticketing:
    - As our preliminary view, we consider the initiative to be important in terms of enhancing seamless passenger transport within Europe. We also support the aim to simplify planning and booking, especially in rail journeys involving multiple operators.
    - Sharing obligation would not cover tickets that allow their holders to travel on multiple transport modes, provided that tickets for the relevant railway service are made available and can be purchased as a stand-alone rail product. Does this mean that there is a requirement to provide stand-alone tickets or otherwise tickets covering multiple transport modes are to be shared?
    - How have the effects of the hosting obligation on independent ticketing platforms and competitiveness in ticket sales been assessed?
    - We would like to know also, has it been assessed, how the obligations would affect the small and medium-sized companies?
    - According to Article 5(2), indispensable railway online ticketing service provider shall conclude a commercial agreement with a requesting railway service provider for the purpose of displaying, re-linking, reselling or distributing the rail products of that provider. What criteria or mechanisms determine which of these is applied in practice? Is it for the requesting provider to decide?
    - When it comes to renumeration in commercial agreements, can it be requested by either party of the agreement?
    - We would also like to know how the displaying of tickets should be handled technically? For instance, will it be solved by APIs or by enforcing certain standards? What is the relation between Telematics TSI and Rail ticketing initiative?
- Protection of passengers with single tickets:
    - It is not clear if the concept of single tickets and the obligation to offer single tickets is supposed to cover also urban and suburban services. In article 12 point 2, journeys involving long-distance and regional rail passenger services are mentioned but paragraph 3, 4, or paragraph 5 (b) does not specify the type of service.
    - Regarding article 12 paragraph 3 and the prohibition to segment or sell any journey, which can be sold under single ticket. Could the obligation to combine and sell as single rail tickets actually affect the provision of multimodal products or can the railway undertakings continue to make agreements with other transport operators and provide multimodal ticket products, even if part of a multimodal product is a rail journey that could otherwise be combined with a rail journey which is not part of that multimodal product?

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- To continue, what if there is a multimodal ticket combining e.g. air+rail ticket, does this mean that when offering tickets, the RU, ticket vendor, or tour operator would have to combine additional rail journeys to this ticket (without the agreement of the parties which originally agreed to offer this multimodal ticket) whenever this is technically possible? Could this change the nature of the *single multimodal ticket* (agreed between e.g. the RU and the air carrier) to *combined multimodal ticket* and affect the responsibility of the contracting parties to the multimodal ticket for disruptions?

- o How is the necessary awareness of changing the ticket from a ticket to a single ticket guaranteed between the operating RUs when the ticket has been sold and combined as a single ticket by someone else than the operating RU. E.g. how is the RU aware that it should reroute the disrupted passengers if they originally provided ticket only for their own journey but it was sold as a single ticket together with legs operated by another RU. Secondly, how the latter RU would know to allow the passenger to continue the journey on their (next) service if the ticket has been changed to a single ticket without that RU's involvement.

- Multimodal Booking:

  - We consider the definitions in Article 2 to be quite complicated. We would like to clarify the definitions. Particularly, the definitions of B2B and B2C MDMS are complicated.

  - Despite its name, it seems that the proposal does not address multimodal travel. Could you explain what the reasoning behind this is? Was there an intent to address multimodal travel too? Also, according to Article 1, regulation establishes a framework to facilitate multimodal (as well as multi-operator). What does that mean in practice?

  - It seems that the proposal focuses quite heavily on air transport and revising old CRS Regulation. Have the main principles used in the proposal been assessed from perspectives other than that of air transport?

  - Paragraph 1 (b) states that Regulation applies to providers of business-to-business multimodal digital mobility services when they offer transport products to business users in the Union, *or when the transport product's underlying transport service is provided, wholly or partially, within the territory of the Union;* Does that mean that B2B MDMS service that operates for example, in China and is used by Chinese business users, is in the scope, if the transport service in question is operated even partly in the territory of the Union?

  - The regulation does not apply to MDMS that are small or medium size enterprises. Does the requirement apply only to the turnover from MDMS services, or to the turnover of the entire company or group?

  - When it comes to designation of B2C MDMSs with significant market power, how have the thresholds in the Annexes been calculated at the Union level and national level?

  - Is the intent that only those B2C MDMS providers that sell tickets could be designated as MDMS providers with significant market presence, as compared to those who only relink services (meta search engines, for example)?

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- In terms of ranking criteria in Article 7, we would like to know the reasoning behind the ranking criteria.
- Initially, we consider the proportionality of the proposed rules important. For instance, in terms of ranking criteria, we consider that it could be appropriate to allow platforms to include other additional ranking criteria.
- As the use of alternative criteria is only allowed if explicitly requested by the end user or the client of the business user, how would such a request be made in practice? Also, how would a request to display sponsored content be made?
- Given that some platforms have developed their own algorithmic ranking and ways of organizing search results, has the impact of introducing ranking criteria on their business models been assessed? Also, what implications would restricting sponsored content display (to user-requested situations only) have for the business models of MDMS providers?
- We would like also to inquire about the relation between Multimodal Booking regulation and the Unfair Commercial Practices Directive (UCPD), taking also into consideration that the Commission is expected to propose amendments to UCPD in the near future. It already protects consumers regarding, for instance, misleading search results on various platforms. How has the UCPD and the ongoing work been taken into account when it comes to this proposal? What is the order of priority between these instruments?
- In terms of equivalent treatment of air carriers in third countries (Article 11), we would like to know the reasoning behind the proposal of the Commission to adopt implementing acts. There is no explanation what such implementing acts would regulate. Could you explain this a bit more?