

TOWARDS EU-WIDE MULTIMODAL TICKETING SYSTEMS

EU TRAVEL TECH POLICY BRIEF

The European transport system is unique in the world in the variety of transport mode it offers to European travellers. Most European cities offer well-developed urban public transport systems which are increasingly complemented with a wide array of micro-mobility schemes (bike-sharing, e-scooters, to name a few). The rail transport network connects the whole continent, with the European Union pushing for more than 20 years for the set-up of a European single railway area allowing travellers to go seamlessly from one country to the other. The European Union has also spent 23.7 billion € since 2000¹ in the development of a European high-speed rail network, connecting all parts of Europe to major cities and hubs.

The EU should therefore be leading multimodal offerings globally: its transport system provides unique possibilities for the combination of all modes of transport, making travel more efficient but also more sustainable, allowing travellers to adopt the less polluting modes of transport whenever possible.

However, the European transport sector accounts for a quarter of CO₂ emissions in Europe. And while travel and interconnectivity between European countries and regions remain pivotal for the social and economic success of Europe, transport emissions continue to grow. The new Commission has announced in its Green Deal that it aims to reduce the transport sector CO₂ emissions by 90% by 2050.

Reconciling the need for seamless mobility across with Europe's decarbonisation objectives calls for a rethink of European mobility. Further developing multimodality is a clear solution to this issue.

In 2016, the total multimodal market was estimated at approximately 65.7 million passengers of the total 10.6 billion passengers, representing 0,6% of travels. And only 5% of these 65.7 million passengers used a single contract for their travel². In order to move the dial towards a fully integrated, sustainable and multimodal travel sector, we need to create favourable conditions for users. Developing an EU- wide multimodal ticketing and payments system in Europe is a precursor for increased multimodal uptake.

Europe has the technology for this. GDSs, OTAs and other content aggregators have been offering multimodal solutions for many years. The European Commission has also worked with a consortium of companies on a number of projects³ which have repeatedly proven that Europe has the technological infrastructure to overcome

¹ https://www.eca.europa.eu/Lists/ECADocuments/SR18_19/SR_HIGH_SPEED_RAIL_EN.pdf

² Source: Source: "[Remaining challenges for EU-wide integrated ticketing and payment systems](#)", 2018

³ See project All Ways Traveling, funded by the European Commission: <https://www.youtube.com/watch?v=hWtyrVKFQl0&feature=youtu.be>

fragmentation. **However, to truly unleash the potential of multimodality, access to fare data is essential. Pooling data from all transport modes into a single system – and allowing travel agencies and consumers to benefit from the vast transport network Europe has to offer - is the only solution to overcome what has, up to now, been a fragmented transport ecosystem.** Such access to data can only be ensured through regulatory intervention at EU level. This is what this paper will explore.

THE DEVELOPMENT OF AN INTEGRATED MULTIMODAL TICKETING SYSTEM HAS BEEN A POLICY OBJECTIVE OF THE EUROPEAN COMMISSION FOR OVER A DECADE.

The European Commission has put a number legislative and policy initiatives forward to support the growth of multimodality. In 2011, the White Paper “*Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system*” set as a policy objective of the European Commission the facilitation of multimodal travel through online information and electronic booking and payment systems. This objective was implemented through the working programme of the Intelligent Transport System (ITS) Directive.

In this framework, the Commission enacted in 2017 the Delegated Regulation 2017/1926 on the provision of EU-wide multimodal travel information services. It provides for the setting up by all Member States of national access points for ITS users to static travel and traffic data (schedules) for all modes of transport. Such an obligation is applied since December 1, 2019.

This is a very positive first step and its results will still need to be evaluated. However, this Regulation has failed to address a key precondition to multimodality: access to all travel data. By not imposing obligations on travel suppliers to share dynamic data (fares, real-time information), ticketing and payments system will remain fragmented.

ENSURING A NON-DISCRIMINATORY ACCESS TO TRANSPORT DATA, STATIC AND DYNAMIC, FOR ALL DISTRIBUTION CHANNELS SHOULD BE THE CORNERSTONE OF A SEAMLESS MULTIMODAL TRANSPORT SYSTEM.

The study “Remaining Challenges for EU-wide integrated Ticketing and Payment Systems”⁴, commissioned by the Commission as part of the “year of Multimodality” in 2018 clearly identified the lack of access to fare data as the main obstacle to develop a seamless multimodal system. The Florence School of Regulation, jointly with the European Commission, came to the same conclusion in October 2019: “*for digitalisation to improve intermodal transport – i.e. for ticketing and payment to become multimodal – data will have to flow across transport operators and across transport modes*”⁵.

⁴ <https://op.europa.eu/en/publication-detail/-/publication/af05b3eb-df43-11e9-9c4e-01aa75ed71a1/language-en>

⁵ <https://cadmus.eui.eu/bitstream/handle/1814/64664/FSR-PB-2019-19.pdf?sequence=1&isAllowed=y>

To achieve a significant upscaling of multimodal ticketing in Europe, access to data cannot rely merely on the conclusion of commercial agreements between travel services suppliers for the combination and distribution of their products. Such agreements will always be limited by the geographical and modal scope of action of its parties. **It has to be extended without any discrimination to all distribution channels, direct and indirect.**

As players of indirect travel distribution, eu travel tech members have the expertise and scale to design multimodal ticketing and payments solutions for their customers, combining services from all modes of transport and from all European countries. Indirect distribution channels can be the real enablers of multimodal transport as they master the technology, know the needs of their customers and have already developed solutions for each mode of transport (air, rail, road, seaborne...) separately.

Indirect distribution platforms are uniquely positioned to provide travellers with a seamless intermodal mobility experience across Member States. As stressed by the Florence School of Regulation⁶, they “*can build a network of networks, a frictionless coordination of fragmented services across Member States, empowering citizens and companies to use transport services across the continent*”⁷.

ACCESS TO TRANSPORT DATA, STATIC AND DYNAMIC, SHALL BE MADE MANDATORY AT EU LEVEL BY THE EUROPEAN COMMISSION

The need of an overarching EU framework is clearly established: it is at EU level that a regulation needs to be adopted, as most long-distance multimodal travel is cross-border. Furthermore, recent legislations adopted in Finland⁸ or in France⁹, while going in the right direction regarding access to data, also show that lack of EU-wide regulation will only lead to more fragmentation and therefore hinder EU-wide multimodal ticketing. Finally, without regulatory intervention, dominant players on national markets will not provide access to their content. On the contrary, they are most likely to continue to deny access to their dynamic real-time data, as witnessed recently in the rail sector in Germany¹⁰ or Sweden.¹¹

⁶ in their [Manifesto](#) for the next five years of EU regulation of Transport

⁷ <https://fsr.eui.eu/manifesto-for-the-next-five-years-of-eu-regulation-of-transport/>

⁸ https://valtioneuvosto.fi/en/article/-/asset_publisher/koko-liikennejarjestelma-mukaan-liikennepalvelulakiin

⁹ <https://www.ecologique-solidaire.gouv.fr/loi-mobilites#e32>

¹⁰ [Press release](#) by the German Competition Authority (BkartA) of 28.11.2019 stating it is examining possible anticompetitive impediment by Deutsche Bahn of mobility platforms, including the fact that mobility platforms are not receiving real-time information about departures and delays.

¹¹ Complaints had been lodged by operators in front of the Swedish competition authority against the dominant Railway undertaking for not giving access to its online portal; <http://www.konkurrensverket.se/nyheter/konsumenter-kan-vinna-pa-reglering-av-forsaljning-av-tagbiljetter/>

TO COMPLEMENT SUCH A MANDATORY ACCESS TO DATA, THE EU OVERARCHING FRAMEWORK SHALL ALSO ADDRESS ISSUES RELATED TO STANDARD-SETTING AND LIABILITY

Access to data only makes sense if it is done through interoperable standard, used within an API (Application Programming Interface) allowing platforms to process the data in a cost-efficient way. One of the challenges of the development of multimodal ticketing is to define such standards. API connections (also known as web services) not only enable the search for timetables, fares and reservations, but also the booking of journeys and tickets.

Public authorities play a key role in such standard-setting exercises, in ensuring standardisation but also in the subsequent enforcement of the common API standards. ETT members stand ready to take part to this effort, as they are the only players with experience in standard setting for each mode of transport.

It is often stressed that multimodal tickets could only be put on the market once all liability issues will have been cleared, as liability regimes can differ strongly from one mode to another. It would therefore be necessary for such an initiative to address this issue in an adequate way. However, although through tickets are obviously a preferable option for travellers, this should not necessarily be seen as an insurmountable obstacle as multimodal solutions could be offered through combined tickets, sold within a single transaction and payment, rather than through-tickets¹².

Such tickets would allow users to get a travel solution suiting their needs without having to design a new multimodal liability regime as each part of the combined ticket will fall under the liability regime of the relevant mode of transport.

eu travel tech represents the interests of travel technology companies. eu travel tech uses its position at the centre of the travel and tourism sector to promote a consumer-driven, innovative and competitive industry that is transparent and sustainable. Our membership¹³ spans Global Distribution Systems (GDSs), Online Travel Agencies (OTA), Travel Management Companies in business travel (TMCs) and metasearch sites.

¹² Such single payments are currently precluded in many instances by the refusal of carriers to let ticket vendors managing the payments, forcing their customers to proceed to several payments in order to purchase combined tickets. Other carriers refuse to provide third parties with full access to their booking APIs. As a consequence, customers have to be redirected to the carrier website to be able to purchase their ticket.

¹³ eu travel tech's members include Amadeus, Booking.com, eDreams ODIGEO, Expedia Group and Travelport. Associate members include Skyscanner, TripAdvisor and American Express GBT. Strategic Partners include Lastminute.com, etraveli, Trainline, Travix, Travelgenio, Hitrail, OAG and CWT