

A Regulation in Search of a Problem: Why the Multimodal Booking Proposal Should Be Withdrawn

The Multimodal Booking Regulation was presented by the European Commission to enable multimodal booking, widen consumer choice and ensure fair competition. It does none of these. It provides no better consumer access to transport offers; it reduces the quality of transport search and booking sites, and it targets independent travel intermediaries with heavy rules that stifle competition and consumer choice. None of its provisions further the goal of easing multimodal bookings.

What remains is a proposal that layers more obligations on top of rules already in force, at the expense of the very intermediaries that are expected to deliver the multimodal comparison that the EU wants.

Neutral display duplicates existing rules, then bans what benefits consumers

The proposal's default neutral display obligations may on the surface convey a sense of transparency, but they interfere in severe ways with how intermediaries display results and ensure their viability. They also prevent platforms from introducing any innovation in how they surface results, to the detriment of consumers.

The concerns that motivate this proposal are either unfounded or already covered by other rules. The new measures would therefore not solve any real issue, but only create more red tape. The main measures are:

1. To prohibit unfair favoring of results of specific transport operators based on underlying payments. Any such practices are already extensively regulated as advertising under the EU's Unfair Commercial Practices Directives, which bans hidden ranking influence and requires paid prominence to be disclosed. When it comes to vertically integrated platforms, the Rail Ticketing Regulation will ensure they rank other operators fairly.

The Multimodal Booking Regulation goes further: it bans even transparent display of sponsored content in ranking results completely (unless users explicitly request it). Sponsored placement is a legitimate way for free-of-charge services to fund themselves and offer tickets and competitive prices. It is also a route for operators, including new entrants and multimodal service providers, to gain visibility and for consumers to find them. Banning it will raise the price of intermediated tickets to the detriment of consumers, threaten the viability of free comparison services, and reduce the value brought to consumers by the very intermediaries the Regulation acknowledges as key to foster multimodal bookings.

● Today's composite ranking — a diverse first screen

Brussels → Florence		Thu 18 Sep · 1 traveller
Sorted by ▽ Best		
<small>Best weighs price, journey time, emissions, quality, ticket-change flexibility, loyalty-programme membership, profile search history, and many other factors. Sponsoring must be made transparent as per EU consumer law.</small>		
	Flight + Rail · combination Belair · Itarail * Considers user's airline loyalty membership	€165 4h 55m
	Rail · 2 changes Belrail · Velotrain · Itarail	€119 11h 55m
	Flight · 1 stop SPONSORED Central Air	€179 7h 10m
	Coach · direct Vianova	€59 19h 30m
	Flight · direct Cheap Air <small>> Inflexible ticket changes · 2.4★ carrier rating · high ancillary fees — all factored in, lowering its ranking.</small>	€119 2h 05m

● Neutral default — near-identical flights crowd the top

Brussels → Florence		Thu 18 Sep · 1 traveller
Sorted by ◆ Neutral		
<small>Neutral applies only the regulated ranking factors. No sponsored placement.</small>		
	Flight · direct Cheap Air <small>▲ Quality, flexibility and reliability scores may not be used — lowest price ranks first.</small>	€119 2h 05m
	Flight · direct BudgetWings	€124 2h 20m
	Flight · direct SkyEuro	€131 2h 10m
▼ BELOW THE FOLD — SEVERAL MORE NEAR-IDENTICAL LOW-COST FLIGHTS BEFORE ANY RAIL OR MULTIMODAL OPTION		
	Rail · 2 changes Belrail · Velotrain · Itarail <small>▲ As airlines are not obligated to share GHG emissions data, a ranking that considers GHG emissions would be forced to place all flight options last — making the ranking less useful. This effectively inhibits sustainable options from being ranked higher.</small>	€119 11h 55m

One illustrative example. On many origin–destination pairs, a default limited to the permitted ranking factors would surface a long run of near-identical low-cost flights before any rail or multimodal itinerary appears — a less diverse, and for many travellers less useful, first screen than today's composite ranking. Fictional mock-up; not a depiction of how any eu travel tech member currently ranks results.

COM(2026) 231, Art. 7(4)–(5). Illustrative only.

2. To steer how intermediaries can rank transport offers, by limiting ranking criteria to only five ostensibly *neutral* factors. This obligation prevents intermediaries from considering neutral criteria not listed in the proposal which could be highly relevant (quality, ticket conditions, itinerary diversity, etc.). It further hinders the default use of other ranking factors which are inherently useful to consumers (such as user search history, length of stay at destination, loyalty memberships).

In addition to a lack of understanding of how complex it is to rank thousands of options on a given route in a manner that is clear and useful to consumers, beneath the detail of this proposal lies a flawed premise: that there is a correct way to rank and display transport options and that any departure is a distortion to be corrected. Ranking travel options transparently is the basic task of independent intermediaries who carefully calibrate it to match their users' preferences; it is how they innovate and distinguish themselves. And it is how they create value for both business users and European consumers. The final outcome of the EU's heavy-handed regulatory approach will be a much poorer user experience across the board.

It should be noted that contrary to the regulation's aims, it will not help highlight more sustainable or multimodal options. By removing intermediaries' flexibility to uprank rail and multimodal options, consumers will see fewer sustainable cross-border options, not more. Moreover, with no standardised methodologies available to calculate aviation emissions, the Regulation will lead to the downranking of products for which emissions information is not available – further worsening visibility for the very options it purports to support.

→ **Co-legislators should not support and actively remove the extreme ban on sponsored content and the restrictive neutral display obligation.**

A gatekeeper regime aimed at the wrong targets

The proposal establishes a regulatory regime akin to the Digital Markets Act; an EU Regulation designed to tame the market power of digital giants like Google and Apple and adopted after decades of recorded market power abuses and concrete practices to address.

No such *gatekeepers* exist among digital transport intermediaries, and no relevant abuse of market power by an intermediary of transport tickets has ever been flagged by a European or national competition authority. The Commission itself calls ticket distribution competitive, with no intermediary near the share that would presume dominance, a finding confirmed by its own Impact Assessment.

By contrast, the vast majority of all tickets are sold directly by the transport operators, without involvement of intermediaries. Indirect transport distribution is subject to a systemic problem of dominant railways and airlines restricting the flow of information to and sales by independent intermediaries, to the detriment of consumers (see our paper on the Rail Ticketing Regulation for more information). The Regulation thus inverts reality: An intermediary cannot foreclose a market it does not control; an operator that captures most sales and withholds its best fares from everyone else plainly can.

The scope is therefore wrong in both directions at once: the proposal regulates intermediaries without market power as though they are gatekeepers, while failing to tame the players who control how tickets are accessed – particularly the largest airlines. In addition, it explicitly excludes the actors that genuinely shape how journeys are found and booked online. Consumers increasingly search and book their travel through comparison services directly integrated into general online search engines. Yet, search engines sit outside the proposal's scope. Consumer search and book are also shifting fast towards AI assistants and agents, which the proposal does not address at all, and which would have no clear legal status under it. A framework built on today's mistaken picture will be obsolete before it is enforced.

→ **Co-legislators should not support and actively remove the gatekeeper-style obligations; the dominance premise is contradicted by the Commission's own findings.**

Disproportionate red tape for intermediaries and national authorities

Even setting its flawed premise aside, the proposal would impose heavy, ill-justified burdens. Independent intermediaries would face designation, notification, monitoring and compliance obligations designed for the largest digital giants, regardless of their size or market power; costs that fall hardest on the smaller players the Regulation claims to support.

The enforcement load is even heavier. National authorities would have to monitor, designate, handle complaints and investigate across the several hundred intermediary services active in Europe, around 175 by the Impact Assessment's own count. Digital intermediaries operating in an average of twenty Member States and two transport modes implies, on that basis, some **7000 separate annual data points to assess across the Union**, to police problems that either do not exist or are already covered elsewhere. That is the direct opposite of the EU's stated simplification and better-regulation agenda.

→ **Co-legislators should not support and actively remove the proposal's burdensome reporting and compliance framework; ticket intermediaries and authorities should not be burdened with enforcing duplicative rules.**