



ALLRAIL

The Future of Passenger Rail

POSITION PAPER

The Great Rail Ticket Unbundling:

***Unpick The TRIPLE Lock-In and
Enable More Choice for Passengers***

Part II

**Passenger Rights -
*Unbundle passenger rights
from formal through-ticketing***

25th February 2026

Executive Summary

Following Part I of our Position Paper “The Great Rail Ticket Unbundling” published last week, and in advance of the EU Commission’s revision of the Rail Passenger Rights Regulation, ALLRAIL now sets out its assessment of the key challenges currently facing rail passengers across Europe.

We highlight deficiencies in the existing framework and propose targeted, practical measures the EU can take to reinforce passenger protection while ensuring a genuinely competitive rail market. Policymakers must now ensure that these elements are fully reflected in the forthcoming revision of the Rail Passenger Rights Regulation. The EU already has the trains, infrastructure and the technology to deliver seamless cross-border rail travel. What has been missing so far has been the consistent enforcement of passenger rights in which services from different rail operators are combined into a reasonable single one-way journey – a so-called **combined journey**.

- ...> ‘Combined journeys’ exist where through-tickets between the relevant rail operators **do not**.
- ...> But alas, **unlike a through-ticket**, missed connection protection (MCP) and delay compensation do not exist for the entire combined journey. The different segments of the trip are separate transport contracts.
 - That means: if a passenger misses a reasonable connection between two rail operators but these have separate transport contracts, then it is the passenger’s fault if she or he turned up to the second operator in the chain late; she or he receives no missed connection help nor delay compensation for the entire booked journey.
 - Even worse, rail ticket vendors are **forced to warn passengers that a combined journey** is not fully protected from the beginning until the end of the journey. This absurd rule actively discourages passengers. It’s as if the rail booking were to carry a **“DO NOT TAKE THE TRAIN”** warning.



Through-tickets would solve the above problems, but they remain at the discretion of market-dominant operators, which often refuse through tickets with new-entrant operators – or sometimes even with each other and even their own subsidiaries.

Without enforceable and effective passenger rights protection attached to a combined journey:



Journey planners will continue to generate a myriad of additional, viable rail options that passengers are put off from taking because of the lack of protection;



Market-dominant passenger rail operators will continue to determine when protection applies;



New-entrant passenger rail operators will remain excluded from protected network effects;



The full potential for rail and revenue for the sector will be lost, and taxpayer subsidy will rise accordingly.

By contrast, **by unbundling passenger rights from the legacy through-ticket**, introducing a binding MCP and a causer-pays system for delay compensation, then multi-operator and cross-border rail travel could become more reliable for passengers, enforceable and genuinely European. To prevent through-ticketing from remaining a tool of market foreclosure, ALLRAIL calls for:



A targeted and proportionate obligation: National railway operators with Significant Market Power (SMP) must be required to conclude through-ticket agreements between each other, their subsidiary operators and with any willing new-entrant operators, on fair, transparent and non-discriminatory terms;



An EU-wide Missed Connection Protection enabling service on the next available train to the passenger's final destination in the case of combined journeys;



Performance-Driven, Causer-Pays Liability Framework For Through-Tickets: Financial responsibility for assistance and compensation in case of disruptions and delay must lie with the railway operator or infrastructure manager that caused the disruption, supported by a robust and transparent back-office settlement mechanism.

Introduction: There is No Single Market for Through-Ticketing

In her Political Guidelines for the current European Commission (EC)¹, delivered in July 2024, **President Dr Ursula von der Leyen emphasised that cross-border rail travel must finally become easier for citizens**, calling for a truly European approach to rail booking and passenger protection¹. **The EU rail system must show some bold ambition**: it must finally function as Europe's backbone for sustainable, competitive mobility.

Yet passenger rail ticketing still does not operate as a Single Market. Cross-border and multi-operator journeys remain fragmented, opaque and **risky** for passengers.

...➤ **Booking a rail journey across the EU is often more difficult than booking a flight, not because of missing infrastructure or technology, but because passenger rights and ticketing practices remain tied to legacy, incumbent-only arrangements.**

EU Cross-border example

Paris, early Friday afternoon

A passenger begins a long-distance rail journey operated by the French state operator SNCF Voyageurs, travelling from Paris in France to Milan in Italy, and then either the state-owned operator FS Trenitalia or the private operator Italo.

The journey is reasonable, bookable, and viable:

- Paris Gare du Nord → Torino Porta Susa
- Torino Porta Susa → Milan

Two long-distance high-speed services and one combined journey (no through ticket). Following a **45-minute delay** of the first service, the connecting train has already departed.

At this point, the journey fails, not for lack of infrastructure or capacity, but because **passenger protection remains bundled to legacy through-ticket structures**. This creates a **structural LOCK-IN**: passengers can only travel "as a network" if state-owned operators choose to allow this, while new-entrant operators or even other state operators are often excluded from visible and protected itineraries.

¹ Full statement available [here](#).

The passenger is immediately confronted with legal uncertainty:

- Are passenger rights **attached to the combined journey**, or only to individual tickets?
- Do any existing voluntary **Missed Connection Protection** schemes apply?
- Can the passenger board the next available service from Turin to Milan, without buying a new expensive same-day ticket?

In practice, continuation depends on voluntary schemes, discretionary participation, and operator-specific conditions. This one-way combined journey demonstrates the structural gap in EU passenger protection.

Core Problem: In Effect, Passenger Rights Are Still at the Discretion of Market-Dominant Operators

According to the latest Eurobarometer survey², **47 % of Europeans** say that three factors are key to encourage them to choose a more environmentally friendly journey: the availability of eco-friendly transport modes, **the ease of finding and booking tickets** (see Part I of our Position Paper “The Great Rail Ticket Unbundling”), **and equal passenger rights across all rail operators.**

As Greenpeace³ highlighted in its latest report, **“the rail ticketing system in Europe is overly complicated and not unified.”** Out of the 109 cross-border routes analysed, it was impossible – or not always possible – to purchase a single through-ticket for 44 routes (40 %), meaning that – if passengers are even aware that it is possible – they often have to buy separate tickets from different rail companies for a one-way journey.

According to another recent (October 2025) **YouGov survey⁴** for the NGO ‘Transport & Environment’ (T&E)⁵, across the EU:

- **61 %** of respondents said they *avoided long-distance rail* due to booking difficulties
- According to the latest Eurobarometer on multimodal travel, one of the main reasons passengers avoid combining different operators is ticketing fragmentation: **18% fear being stranded when travelling on separate tickets, while 9% report that they are unable to purchase all tickets in one place.⁶**

² European Commission. (2025). *Eurobarometer* No. 3178. European Union. Available [here](#).

³ <https://greenpeace.at/uploads/2025/08/greenpeace-analysis-flight-vs-trains-2025.pdf>

⁴ <https://www.transportenvironment.org/uploads/files/Heres-what-European-travellers-think-of-rail-booking-processes-1.pdf>

⁵ <https://www.transportenvironment.org/>

⁶ European Commission. (2025). *Eurobarometer* No. 3178. European Union

These figures **imply a very high share of journeys that would require at least one change**, because the problems cited are specific to **multi-operator journeys**.

This represents **up to 61%** of demand lost for the rail passenger market. Rail is losing out materially on its full potential. This is crucial revenue lost that, for example, could make the difference between services being carried out in a commercially viable Open Access manner, or as a taxpayer-subsidised Public Service Obligation instead.

Regulation (EU) 2021/782 from just five years **ago requires railway operators to make "all reasonable efforts"** to enable seamless journeys. However, in practice, this has proven open to interpretation and largely insufficient. Meanwhile, the alternative of voluntary cooperation has delivered too little, too slowly (as demonstrated below).

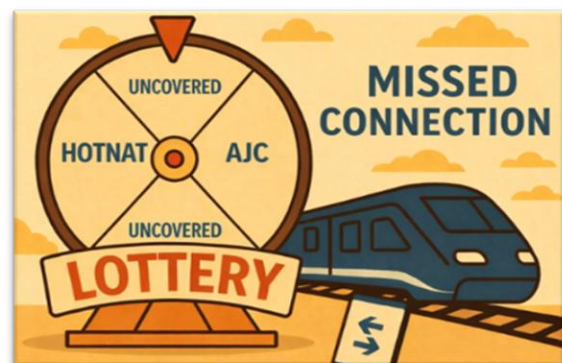
As a result, passenger protection today depends less on the journey itself but more on whether state-owned incumbent operators with Significant Market Power (SMP) have chosen to cooperate, either among themselves or (rarely) with new entrants. Where no such cooperation exists and passengers are forced to combine tickets under separate transport contracts, then they are left without meaningful protection, **even when** the journey is perfectly viable and can be booked in a single transaction.

The Result: Cigarette Packet Warning & a Lottery

Today, when rail ticket vendors innovate to combine options from a variety of rail operators but without a through-ticket they **are forced to warn passengers that their trip is not fully protected**, or else themselves face liability for any missed connections. This absurd rule actively discourages passengers. It is as if the rail booking were to carry a **"DO NOT TAKE THE TRAIN"** warning.



Meanwhile, two voluntary Missed Connection Protection (MCP) schemes already exist when passenger combine two different operators with transport contracts, but they are suboptimal: the "Hop on the Next Available Train



(HOTNAT)⁷” and the “Agreement on Journey Continuation (AJC)⁸”. Both remain optional for operators, with limited scope.

Some impose additional conditions, like only being valid for connections at specific stations⁹. Right now, in 2026, Missed Connection Protection (MCP) for combined journeys is a **lottery for the passengers**.

Case study: Rail Connections between France and Spain

Every day – in both directions – there is a direct and affordable rail journey between **Paris and Barcelona**, one of the busiest cross-border travel corridors in Europe. The route combines two state-operated, taxpayer-subsidised services: the French operator **SNCF’s Intercité de Nuit** night train from Paris to Latour-de-Carol, followed by a **regional service** from Latour-de-Carol to Barcelona by the Spanish operator **Renfe Rodalies**.



The SNCF train from Paris meets the Renfe train to Barcelona at border town Latour-de-Carol, Copyright: Thibault Constant

Both trains have been in operation for years, the infrastructure is fully in place, and fares can be as low as **€49 for the entire journey, even at the last minute** – a price that can easily compete with less sustainable modes of transport, such as the private motor car or a low-cost airline.

- Yet this perfectly viable connection is **invisible to passengers**: in this specific case, no rail ticket vendor can even show or sell the combined journey in one transaction yet.

Furthermore, even where services **are operated by subsidiaries of the same company**, passengers still cannot always buy through-tickets. A clear example is the **Madrid–Paris services** linking two major EU capitals.



SNCF’s TGV InOUI Paris–Barcelona service.

- **Today, it is still not possible to purchase a through-ticket between Madrid and Paris.** Spain’s state-owned operator Renfe provides services and sells tickets between Madrid to Marseilles, but it is not allowed to operate services to Paris yet.

Meanwhile, the French state-owned operator SNCF Voyageurs operates Paris–Barcelona services under its brand TGV INOUI, and Barcelona–Madrid services via its wholly owned

⁷ <https://www.railteam.eu/en/services-on-your-journey/hop-on-the-next-available-train-hotnat/>

⁸ https://www.cit-rail.org/media/files/passenger-info/ajc_web_content_2025-07-01.pdf

⁹ For instance, HOTNAT is only valid for changes at Paris Brussels-Midi, Cologne, Munich, Basel, and Zurich.

subsidiary operator OUIGO Spain. Yet **neither SNCF Connect (the in-house vertically integrated rail ticket vendor of SNCF Voyageurs) nor OUIGO Spain offers a single through-ticket covering the full Paris–Madrid journey.**

The Solution: Unbundle Passenger Rights from Legacy Through-Tickets

- ...> **These cases demonstrate that, despite an existing rail passenger rights framework - including obligations intended to ensure through-tickets when services are operated by the same holding group - passengers still do not benefit from comprehensive and reliable protection.**
- ...> **Fragmented booking systems combined with the absence of enforceable, cross-operator passenger protection for combined journeys continue to erode trust in EU passenger rail. Here is how this must change:**

1. Protect the Combined Journey, Not Just the Legacy Through-Ticket

Passenger rights must cover combined journeys, provided a reasonable Minimum Connection Time (MCT) is respected, regardless of the operators combined.

2. Mandate Through-Ticketing Where Significant Market Power (SMP) Exists

National railway operators with Significant Market Power (SMP) must be required to conclude through-ticket agreements on fair, transparent & non-discriminatory terms with any other willing rail operator.

3. Enshrine Missed Connection Protection (MCP) as a Binding EU Right

Missed Connection Protection must become a binding EU passenger right for all multi-operator journeys booked in a single transaction with a reasonable Minimum Connection Time (MCT). In the event of disruption:

- The ticket vendor that originally sold the ticket must be able to inform passengers in real time of their continuation options;
- The passenger must be entitled to travel on the next available train to their final destination, subject only to available capacity and safety constraints.

4. Introduce a Performance-Driven, Causer-Pays Liability Framework

Stronger rights require legal clarity for through-tickets

- The party responsible for the delay must bear the financial consequences.
- Passengers must never be required to arbitrate between operators.

The ticket vendor that originally sold the ticket may provide immediate assistance and compensation, but in a robust back-office settlement process, the railway operator or infrastructure manager responsible for the disruption must reimburse those costs.

A clear **causer-pays framework** would:

- Reward punctuality and reliability, motivating all to improve performance.