# GBTA Position Paper: Impact Assessment study MDMS & SDBTR

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## Executive summary

*The Global Business Travel Association (GBTA) welcomes the opportunity to contribute to the European Commission's [Impact Assessment support study](#) for the new proposal addressing market challenges for the development of multimodal digital mobility services (MDMS) and the single digital booking and ticketing regulation (SDBTR). Business travellers are eager to be able to combine different transport options within one ticket in a seamless way, which would help the sector become more efficient and sustainable.*

*GBTA believes that regulatory action from the European Union is needed to solve the lack of offer of multimodal trips in Europe in spite of an existing strong demand from customers. The lack of clear conditions for combining and reselling mobility products and the lack of consistent, reliable information on the emissions associated with individual and combined modes of transport is the primary problem the European Commission should address in its future legislative proposals.*

*To do so, the Commission should focus on 1) ensuring open access to transport data by MDMS platforms, 2) providing GHG emissions data on MDMS platforms in a harmonised way, 3) ensuring travel options are displayed in a neutral way to allow for consumer choice, and 4) guaranteeing passenger services and a "one-stop shop" for travellers.*

*These measures would allow for MDMS platforms to have access to all data on trips from transport operators, in turn allowing business travellers to choose the most sustainable and efficient options and the ones most in line with their travel policies, leading the way to a more sustainable and competitive travel sector.*

## Introduction

GBTA has long supported the EU's work towards facilitating multimodal travel by providing the regulatory framework needed to meet the demand for combining different transport options within one ticket. This would make it easier for business travellers to choose greener transportation options in a seamless way – both in the booking process and in the trip itself. The technology to compare rail with flights or airport-to-city train with taxi fares or to combine multiple modes of transport in one trip is emerging but is hindered by lack of access to data and the lack of opportunity for intermediaries to sell multimodal transportation tickets.

With corporate travel managers eager to reduce the environmental footprint of their travel programmes, the availability and comparability of data across modes of transport, especially when combining air and rail, will be key to success.

Furthermore, figures from the recently published [Eurobarometer](#) on EU citizens' travel habits, preferences and experiences, support the need for policy action at the EU level to address their concerns:

- More than three-quarters of respondents replied that **environmental impact is important to them** when planning a regional or long-distance journey. Nonetheless, while 21% of

respondents report that this means they adapt their journey accordingly, 22% find it difficult to change their habits, and another 22% find it difficult to find sustainable alternatives.
- When it comes to multimodal travel, over a third of respondents – who have experience with booking **multimodal journeys** – report that these journeys **are difficult to book**.
- Among respondents who never or rarely booked journeys combining different collective transport modes nor journeys combining different transport operators within one mode, 29% said they didn't because it not necessarily. Excluding those, however, the most-frequently mentioned reason for not booking multimodal trips is that **the journey would have taken too long, chosen by 25% of respondents**. This is followed by the journey would have been more expensive (20%), that respondents could not find a suitable combination (17%), and that they did not want to buy several separate tickets and risk being stranded if they missed a connection (13%).

These figures show a clear need to address the barriers that citizens face when considering booking multimodal travel. **The right regulatory framework would meet the demand for combining different transport options and would make it easier for citizens to shift towards more sustainable and efficient ways of travelling.**

### A. *Problem definition: Resolving data sharing challenges to support a seamless and greener travel experience*

GBTA believes the problem definition fits with problem 1 as identified by Ricardo: "limited and distorted information and access to tickets for consumers on MDMS". This makes it difficult for business travellers to compare and combine travel options and fares, leading to low take-up of multimodal options by business travellers.

Specifically, business travellers face:

a. The lack of clear conditions for combining and reselling mobility products, as well as for journey continuation.
b. The lack of consistent, reliable information on the emissions and calculation standards associated with individual and combined modes of transport.

These problems stem mainly from problem driver 1 as defined by Ricardo: "limited willingness of indispensable operators to provide their full offer on fair terms to MDMS". **Regulation is necessary to address the current market failure of large transport operators withholding data and travel information from MDMS platforms and reserving such data exclusively to their direct distribution channels**. Without non-discriminatory access to data (schedules, fares, emissions…) on various transport modes, MDMS platforms will not be able to offer multimodal tickets and business travellers will not have visibility of more sustainable transport options.

GBTA believes that the SDBTR and MDMS initiatives **should set the stage for greater harmonisation across the EU** and support a seamless travel experience for business travellers across borders.

### B. *Policy measures: Access to transport data, emissions data, and neutral display*

1. *Ensure open access to transport data by MDMS platforms*

To address the above-mentioned problem 1, the Commission should focus on achieving specific objective 1: "improve completeness and transparency of information on multimodal digital mobility services", though not exclusively for the purchase of rail tickets but for all transport modes.

The MDMS and SDBTR initiatives have the potential to engage a wide range of transport providers wishing to participate in multimodal platforms based on transparent ranking criteria, ensuring fair competition and market access for the various mobility players.

**To realise this potential, GBTA believes that it is essential for the European Commission to create the conditions for transparent and fair, reasonable and non-discriminatory access by MDMS to real-time data and travel information from transport operators.**

It is crucial that all transport providers, regardless of their focus on serving different types of customers, are treated equally in terms of providing non-discriminatory access to real-time data and travel information to MDMS platforms on fair, reasonable and non-discriminatory (FRAND) terms. This data will have to be made available to intermediaries on FRAND terms to help business travellers make sustainable choices and compare and switch between travel modes.

**To fully achieve its ambitious objectives, the SDBTR and MDMS Regulation must cover all relevant players of all modes, meaning those with a certain degree of market power. In our view, this specifically includes obligations for large airline groups, rail operators and municipal & long-distance public transport operators.**

For these purposes, the Commission should consider adopting the policy measures as outlined in Ricardo's Impact Assessment study:

- 15. Applies to all rail operators: respecting the principles on distribution fees and without imposing highly restrictive clauses (exclusivity clauses, marketing clauses and other technical restrictions) when entering into commercial agreements with MDMS.
- 17. Applies to all rail operators with significant market power and to all other rail operators in relation to PSO and cross-border services: obligation to enter into commercial agreements with willing MDMS to enable the sale of tickets.

These measures would allow for MDMS to show and sell all available tickets, making it easier for business travellers to choose the most efficient and sustainable options. **However, while the proposed measures would apply exclusively to rail operators, GBTA believes that the obligations should be equal for operators in other modes, including aviation. Only universal obligations on transport operators to share their content with MDMS will allow for multimodality to flourish.**

### 2. Provide GHG emissions data on MDMS platforms

Business travellers are looking to switch to greener modes of transport. However, the lack of emissions data is a major barrier to climate action: a study by GBTA shows that two-thirds (63%) of business travel professionals claim the lack of transparent sustainability data is the main barrier to climate action.

The MDMS and SDBTR initiatives offer the opportunity to help travellers select greener modes of transport by displaying the climate impact associated with a trip at the point of sale.

**To this end, GBTA calls on the European Commission to include a provision on the disclosure of GHG information on MDMS platforms, based on a harmonised measurement framework to allow comparability.**

This again relates to problem 1: "limited and distorted information and access to tickets for consumers on MDMS". Consumers on MDMS should have access to all information before purchasing their tickets and this should include information on emissions. To achieve this, policy measures 15 and 17 on commercial agreements between MDMS and transport operators should include obligations on transport operators to share data on their emissions. Again, this should include all modes, not exclusively rail. That would allow MDMS to share this information with all its customers.

This information on emissions should be shared using a harmonised framework. Such harmonised framework has already been developed by the European Commission through its CountEmissionsEU proposal and Parliament and Council are expected to approve it soon. GBTA has been supportive of this effort (view GBTA position on CountEmissionsEU here) and calls on the European Commission to ensure alignment between CountEmissionsEU and the upcoming SDBTR and MDMS initiatives.

### 3. *Neutral display*

Business travel, as opposed to leisure travel, is usually 'managed travel', as companies and organisations often have a travel policy that reflects their values and preferences that match their corporate social responsibility, and fiscal goals. They often also contract with preferred suppliers to provide services that meet the goals of the organisation.

Because of this, companies willing to book multimodal travel for their employees need for MDMS to show the different travel options in a neutral way, so that travel managers can easily choose the options for viewing by their corporate travellers that align with their company's travel policy.

To make sure this is the case, the Commission should consider applying proposed policy measure 1:

- 1. "Obligation for all MDMS to apply the CRS Code of Conduct neutral display obligations. Neutral display ranking criteria and display rules are updated. For transport operators (in all modes): obligation to apply data accuracy rules."

That way, it will be up to the customer, in the case of managed business travel usually the travel manager, to choose based on a neutral display of travel options. Should the company decide it wants travellers to take a preferred carrier to save on emissions or cost, then they will be able to highlight the options that align with company policy. In turn, this saves time for the corporate traveller when booking a trip.

### 4. *Guarantee passenger services and a "one-stop shop" for travellers*

Business travellers rely on digital technologies to make bookings and plan their travel in order to increase efficiency and convenience. GBTA sees the MDMS and SDBTR initiatives as an opportunity to create a "one-stop shop" for business travellers where they can find all relevant information about their travel in one place. This includes data on price, emissions, and real-time data. Regulations should guarantee that all this data is not only available but also easy to find and understand for the final customer on a single platform.

In connection to this, passenger rights in the context of multimodal trips should be protected and travellers should be made aware of them. The future regulation on passenger rights in the context of multimodal journeys, currently being debated in Parliament and Council should be well aligned with the proposals on MDMS and SDBTR, to ensure legal clarity for all stakeholders.

### C. Baseline

If the European Commission takes no action to fix the identified problem of the lack of multimodal travel offers in Europe, it will be very difficult for business travellers to switch towards greener yet efficient travel options. The lack of harmonisation in digital mobility services across the EU would persist, making it difficult for business travellers to book and combine different modes of transport seamlessly.

In addition, the absence of transparent greenhouse gas (GHG) emissions data would hinder business travellers from making environmentally conscious decisions, slowing down efforts to reduce the carbon footprint of corporate travel. Without trustworthy and available data, it will be very difficult for travel managers to make the more sustainable choice. Furthermore, the inability to compare and switch between travel modes due to inconsistent data would result in inefficiencies and higher costs for business travel.

Overall, inaction by the Commission would impede progress towards greener, more efficient, and seamless business travel across Europe.

### D. Impacts of potential policy measures

The suggested policy measures endorsed by GBTA, policy measures 15 and 17 (though extended to all modes of transport) and policy measure 1, would allow for MDMS platforms to have access to all data on trips from transport operators. This would allow them to show and sell all travel tickets, allowing business travellers to choose the most sustainable and efficient options and the ones most in line with their travel policies. This would include the provision of transparent information on emissions from each leg of the trip and the display of the travel options in a neutral way.

For this to be achieved, MDMS must have access to travel information from transport operators under transparent, fair, reasonable and non-discriminatory conditions.

**About GBTA**

*The Global Business Travel Association (GBTA) is the world's leading business travel and meetings trade organisation, serving stakeholders across six continents. GBTA and its 8,000+ members represent and advocate for the €1,250 trillion ($1,357 trillion USD) global business travel and meetings industry. GBTA and the GBTA Foundation deliver world-class education, events, research, advocacy, and media to a growing global network of more than 28,000 travel professionals and 125,000 active contacts. For more information, visit gbta.org and gbtafoundation.org*