

GBTA Position on the EU Passenger Package

Rail Ticketing Regulation | Multimodal Booking Regulation | Rail Passenger Rights Revision

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GBTA ([Global Business Travel Association](#)) is the voice of the corporate travel industry, a 1.5 trillion Euros global economic engine. Through our advocacy efforts in Brussels, we represent the voice of thousands of corporate travel buyers and travel managers responsible for moving employees around the world, as well as the airlines, hotels, ground transportation providers, technology companies and other suppliers that power business travel. Because our members experience firsthand how policies on transportation, borders, sustainability and traveller protection work in practice, GBTA provides policymakers with a direct line to the businesses and professionals affected by those decisions. Our goal is simple: to help create the conditions for business travel to be seamless, sustainable, safe and a driver of economic competitiveness.

Why the EU Passenger Package Matters to Business Travel

Business travel differs from leisure travel because employers must manage traveller safety, policy compliance, cost, payment, reporting, sustainability and disruption support across the full journey. Corporate programmes depend on integrated booking and servicing channels that keep itinerary information visible and actionable.

Content and choice: Fragmented or unavailable content pushes travellers toward supplier-direct bookings, reducing policy compliance, itinerary visibility, reporting quality and the ability to provide disruption support.

End-to-end servicing: A booking is not complete unless authorised corporate channels can change, cancel, refund, exchange and rebook it when plans change.

Duty of care: Complete itinerary visibility and clear responsibility during disruptions help companies locate and support travellers.

Competition and innovation: Practical access for qualified distributors can improve comparison, support new technology providers and reduce dependence on a limited set of aggregators or incumbent platforms.

Efficiency and sustainability: Comparable air, rail and combined options allow companies to select lower-emission travel where it is operationally viable, without treating reduced travel as the only sustainability outcome.

For these reasons, GBTA broadly supports the package. Taken together, the proposals can expand access to rail content, make air-rail comparison more practical, strengthen competition in distribution and give travellers clearer protection when multi-operator journeys are disrupted. The three files should be treated as one connected policy framework: better content access has limited value without full servicing, and easier booking has limited value without end-to-end passenger protection.

Proposal	What it achieves	Business travel significance	GBTA priority
Rail Ticketing Regulation (RTR)	One journey, one train ticket.	Determines whether complete rail content can be sold and serviced through managed channels.	Ensure access to fully serviced and protected multi-operator tickets.
Multimodal Booking Regulation (MBR)	One place to compare and book transport.	Shapes how air, rail and other modes are displayed, combined and managed.	Preserve corporate policy displays and deliver genuine air-rail integration.
Rail Passenger Rights Revision (RPR)	Better protection when rail trips are disrupted.	Provides certainty, rerouting and clear responsibility across operators.	Guarantee one transaction, one protected journey, with continuity of travel first.

GBTA Core Policy Asks Across the Three Files:

GBTA priority	GBTA policy ask	Primary files
1. Complete content access	Require practical, non-discriminatory access to comprehensive rail and multimodal content, including schedules, fares, products, availability and disruption information, on fair, reasonable and non-discriminatory (FRAND) terms.	RTR / MBR
2. Equivalent servicing	Ensure TMCs, OBTs and other authorised distributors can sell and service bookings with capabilities equivalent to supplier-direct channels, including changes, exchanges, cancellations, refunds, rebooking and disruption management.	RTR / MBR
3. Corporate control & choice	Explicitly preserve corporate policy-based ranking and display, including preferred suppliers, negotiated rates, payment controls, duty of care, reporting and sustainability objectives.	MBR
4. Genuine multimodal functionality	Enable meaningful air-rail comparison, booking and servicing so multimodal integration delivers practical benefits for travellers and travel programmes while supporting sustainability objectives.	MBR / RTR
5. Protected end-to-end journeys	Treat multi-operator journeys purchased in one transaction as one protected journey, prevent artificial ticket splitting and ensure clear responsibility across operators.	RTR / RPR
6. Disruption recovery	Put journey completion first, with timely rerouting, protected connections and automatic rebooking where feasible, rather than leaving travellers to resolve disruption across multiple operators.	RPR / RTR
7. Proportionate data safeguards	Limit data sharing to what is necessary, secure and appropriate for booking, servicing, traveller protection, reporting and corporate payment needs, with clear accountability for its use.	RTR / MBR

GBTA Position on Each File:

1. Rail Ticketing Regulation (RTR)

Making rail work for managed business travel

GBTA POSITION: Access to rail content must translate into practical rights for TMCs, online booking tools and other authorised distributors to display, sell and service complete rail journeys across European markets. The final rules should deliver open competition, end-to-end servicing and protected multi-operator travel.

Policy context

The RTR seeks to simplify cross-border and multi-operator rail booking by improving access to schedules, fares, reservation availability and ticketing information, and by enabling greater cooperation across operators and distribution platforms. For corporate travel, success depends on whether that content can be found, booked, paid for, serviced and reported through managed channels.

GBTA policy priorities

1. Mandatory, practical content access

Require rail operators to make relevant schedules, fares, reservations, products, real-time availability and disruption information available to qualified third-party channels on FRAND terms. Scope should include TMCs, online booking tools, corporate agencies and professional servicing platforms.

2. End-to-end corporate servicing

Provide authorised distributors functionality equivalent to operator channels for modifications, exchanges, cancellations, refunds, rebooking and disruption management. Access should also support traveller profiles, corporate payments, Level 3 transaction data and VAT-compliant invoicing.

3. Protected multi-operator single tickets

Enable platforms to create single tickets across operators with clear conditions, protected connections, journey-continuation rights and clear responsibility when disruption occurs.

4. Open and competitive distribution

Prevent licensing, commercial, technical or approval barriers from undermining access. Strengthen independent distribution rather than relying only on incumbent operator platforms to host competitors.

5. Reliability and traveller confidence

Pair ticketing reform with reliable operational delivery, realistic connections, timely rerouting and effective disruption support.

Specific policy asks

- Define “content” and “functionality” broadly to include relevant fares, products, real-time information, booking and full post-booking servicing.
- Apply FRAND requirements so access cannot be defeated by excessive connection costs, discriminatory terms or impractical technical conditions.
- Use common technical standards and robust APIs for consistent cross-border implementation.
- Guarantee equivalent servicing, payment, data and invoicing capabilities across supplier-direct and authorised third-party channels.
- Ensure every multi-operator single ticket carries genuine end-to-end protection, including rerouting and clear liability.
- Include appropriate safeguards for secure and lawful transfer of passenger and traveller-profile information.

2. Multimodal Booking Regulation (MBR)

Preserving managed travel while expanding multimodal choice

GBTA POSITION: GBTA supports greater access, transparency and multimodal choice, but the regulation must recognise corporate booking tools, TMCs and managed travel programmes. Companies must retain control over policy-based presentation while receiving fair access to comprehensive content and servicing.

Policy context

The MBR would govern the search, comparison, combination and purchase of journeys across transport modes. It addresses display and ranking, content access, commercial relationships, interoperability and transparency. The framework should allow business travellers to compare air, rail and combined journeys in a common workflow while preserving corporate requirements.

GBTA policy priorities

1. Preserve corporate policy-based displays

Explicitly recognise corporate booking tools so companies can prioritise compliant options, preferred suppliers, negotiated rates, duty-of-care requirements, payment processes, sustainability goals, safety and operational reliability.

2. Separate content neutrality from corporate presentation

Platforms should receive fair access to comprehensive content, but customers should control how that content is filtered, ranked and presented to their travellers.

3. Ensure meaningful FRAND access

Prevent unreasonable licensing, commercial, technical or approval barriers. Access should cover fares, schedules, booking and servicing, corporate payments, Level 3 data, VAT invoicing and reporting.

4. Protect passenger and corporate data

Limit data sharing to what is necessary to book, manage, service and protect the journey, with clear responsibility for information at each stage.

5. Deliver genuine air-rail integration

Enable comparison, booking and servicing across relevant modes using total price, door-to-door time, connections, reliability, flexibility, traveller experience and sustainability indicators.

6. Strengthen disruption management

Facilitate flexible ticket conditions, automatic rebooking, protected connections, realistic connection times, coordinated communication and clear responsibility during irregular operations.

7. Advance efficiency and sustainability together

Help companies choose the most efficient and sustainable practical option for each journey, rather than framing sustainability solely as reduced travel.

Specific policy asks

- Preserve corporate policy-based ranking and display, including preferred suppliers, negotiated rates and company controls.
- Apply enforceable FRAND principles to content, commercial terms, technical access and servicing.
- Support corporate payment, invoicing, reporting, modifications, cancellations and refunds.
- Enable meaningful air-rail comparison, booking and servicing.
- Strengthen automatic rebooking, protected connections and disruption responsibility.

3. Rail Passenger Rights Revision (RPR)

Ensuring seamless, protected multi-operator rail journeys

GBTA POSITION: A multi-operator rail journey purchased in one commercial transaction should be treated as one protected journey. Passenger rights must follow the traveller from origin to destination, with timely rerouting, clear responsibility and practical assistance taking priority when disruption occurs.

Policy context

The revision would strengthen protection for journeys involving multiple railway undertakings, including missed connections, assistance, rerouting, reimbursement and compensation. The proposal addresses fragmented booking structures and uncertainty over who is responsible when disruption affects an itinerary involving more than one operator.

GBTA policy priorities

1. Protect the full journey

Treat a multi-leg, multi-operator itinerary purchased in a single transaction as one protected journey, regardless of underlying commercial agreements or ticketing systems.

2. Prevent artificial ticket splitting

Do not allow commercial or technical practices to divide a journey into separate contracts where a protected single ticket could reasonably be issued. Where separate contracts are unavoidable, provide clear pre-purchase information about the effect on rights and remedies.

3. Put journey continuation first

Require timely rerouting, practical assistance, protected onward connections and coordination across operators. Reimbursement and compensation should not substitute for completing the journey.

4. Establish passenger-facing responsibility

Travellers should receive immediate help through a clear point of contact. Operators and the selling platform should coordinate behind the scenes without delaying support.

5. Preserve compensation for accountability

Maintain compensation when obligations are not met, while designing operational remedies around continuity of travel.

6. Make protection workable for managed travel

Support transparent ticket conditions, real-time disruption information, automated flexibility where appropriate and efficient servicing through corporate booking channels.

Specific policy asks

- The final framework should establish a simple principle: one commercial transaction, one protected journey and one clear path to assistance.
- Rights must not be diluted by ticket structure, cross-operator rerouting must be effective, and travellers should receive immediate support without navigating liability disputes among operators.

For any questions, please contact Shane Downey at sdowney@gbta.org

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