



Euroconsumers' response to the consultation on the targeted revision of the Rail Passenger Rights Regulation

Proposal for a Regulation amending Regulation
(EU) 2021/782 — COM(2026) 233

July 2026



Introduction

Euroconsumers¹ and its member organisations, Altroconsumo (Italy), OCU (Spain), Testachats/Testaankoop (Belgium), DecoProteste (Portugal), Euroconsumers Polska (Poland) and Proteste (Brazil), welcome the opportunity to respond to the proposed targeted revision of Regulation (EU) 2021/782. **We support its central goal** of ensuring that a passenger who buys a single ticket for a journey involving several railway undertakings is protected across that whole journey, including when a connection is missed. This **closes a real and long-standing gap**.

A rail network that consumers trust is not a brake on a competitive rail sector, but it's foundation. **Passengers choose rail more often when they can rely on it:** when a journey runs on time or is fairly compensated when something goes wrong. But rights only work if they are calibrated to how often things actually go wrong, and if they are enforced.

Our response draws on **first-hand evidence** from our members. We are responding separately to the proposed Rail Ticketing Regulation (COM(2026) 232), where our evidence on cross-border ticket distribution is set out in full.

1. Compensation calibrated to the delays passengers actually experience

The proposal extends existing protection to multi-operator single-ticket journeys, meaning consumers would benefit from 25% of the ticket price for a delay of one to two hours, and 50% for two hours or more.² While we welcome this as a positive first step, **our data shows that these thresholds sit above the great majority of real disruption**.

When Altroconsumo monitored 54 Italian routes over 43 consecutive days, totalling roughly 28,000 observations taken from Rete Ferroviaria Italiana's public live-arrivals service, only 5.7% of Frecciarossa services and 3.6% of Italo services were delayed by 30 minutes or more. However, 13% and 7.8% respectively were delayed

¹ **About Euroconsumers:** Gathering six national consumer organisations and giving voice to a total of more than 7 million people in Italy (Altroconsumo), Belgium (Testachats/Testaankoop), Spain (OCU), Portugal (DecoProteste), Poland (Euroconsumers Polska) and Brazil (Proteste), Euroconsumers is the world's leading consumer group in innovative information, personalised services and defence of consumer rights. <https://www.euroconsumers.org/>

² Art. 1

by 15 minutes or more.³ Measured train by train, in other words, **more than half of the high-speed services delayed by 15 minutes or more never reach even the 30-minute mark**, let alone the one-hour floor at which EU compensation begins.

Spanish passengers report the same pattern from the other direction. In a consumer survey carried out in April 2026, OCU found that **62%** of those who had travelled on high-speed (AVE) or long-distance services in the previous three months **experienced frequent punctuality problems, with delays exceeding 30 minutes in 35% of cases**. On regional and medium-distance services, 55% reported frequent delays and 21% delays of more than 30 minutes; on commuter and short-distance services, 48% reported frequent delays, and 3% said their last service was cancelled or never departed at all.⁴ Both studies show that **delays are not exceptional, and most are invisible to the current compensation regime**.

Lowering the trigger is neither novel nor untested. Parts of the Spanish market already compensate from 15 minutes: OCU notes that Renfe had previously maintained a voluntary long-standing commercial commitment on high-speed services that refunded 50% of the fare for 15-minute delays and 100% at 30 minutes. While this was dropped in 2024, the Thirty-First Additional Provision of Law 9/2025 on Sustainable Mobility reinstated the commitment from 2026.⁵ Altroconsumo's Italian figures make clear the benefits of introducing a dedicated 15-minute trigger for high-speed services, which would more than double the number of passengers entitled to redress.

The case for lower thresholds is not that passengers simply want more money. Compensation at these levels does two things that matter to the wider goals of the Package.

First, it recognises a real cost. Arriving 20 or 40 minutes late at a final destination is not a trivial inconvenience. It can mean a missed onward booking, a lost work commitment, or an arrangement at the other end that cannot be remade. Standardised compensation puts a modest, predictable price on that disruption.

Second, the threshold is not only a consumer-protection tool but a performance signal to operators. It marks the point at which delay starts to carry a cost, and an incentive to operators to improve. With the current floor set at one hour, the large

³ <https://www.altroconsumo.it/vita-privata-famiglia/viaggi-tempo-libero/news/inchiesta-tempi-percorrenza-treni>

⁴ <https://www.ocu.org/organizacion/prensa/notas-de-prensa/2026/retrasostrenes010626>

⁵ <https://www.ocu.org/organizacion/prensa/notas-de-prensa/2026/transporte230226>

volume of shorter delays, which our evidence shows is where most disruption actually sits, carries no consequence at all. A threshold that never reaches the delays passengers routinely experience cannot exert the pressure to improve that a compensation regime is meant to create. And because the Package's central aim is rail a trustworthy alternative to flying and driving, a regime that leaves the most common delays unaddressed undercuts the very confidence on which a shift to rail depends.

Compensation should also reach passengers without having to chase it.

Altroconsumo's survey of around 1,500 passengers found that only 49% of those entitled to compensation for a delay of 30 minutes or more actually claimed it. This is even more startling when you consider that almost all claims that were submitted were paid.⁶ A right that must be actively claimed is a right most passengers never exercise. OCU has likewise asked that operators be required to send affected passengers an automatic confirmation stating the amount due.

Recommendations:

- **Lower the compensation thresholds** to 30% of the ticket price from 30 minutes, 50% from 60 minutes and 100% from 120 minutes, with a dedicated trigger at 15 minutes for high-speed services.
- **Make compensation automatic**, paid through the original method of payment without requiring the passenger to submit a claim, and confirmed to the passenger in writing with the amount due.
- **Apply the thresholds uniformly** across all operators and service types, so that protection does not depend on which company a passenger travels with.

⁶ <https://www.altroconsumo.it/vita-privata-famiglia/viaggi-tempo-libero/news/inchiesta-disagi-treni>

2. Protection should follow the journey, not the transaction

The proposal defines a single ticket as evidence of a through-ticket, or of two or more transport contracts for a journey purchased in a single commercial transaction.⁷ Every right it creates depends on meeting that condition. **A passenger who buys the same journey in two purchases falls outside it entirely.**

Whether a passenger can meet the condition depends on something largely outside their control: whether one sales channel carries every leg of their journey, at a price they are willing to pay. Our review of cross-border ticket sales found that neither holds reliably. ÖBB and Trenitalia were the two channels that most often did not sell a given international journey at all. Trenitalia sold the Milan–Paris Frecciarossa journey, but not the Paris–Brussels Eurostar, so a passenger beginning on the Italian incumbent's site could not have assembled a Milan to Brussels journey there. SNCF did not offer either of the Vienna–Munich services we tested.

Price makes the problem sharper. We found the same Vienna–Munich EuroCity sold at €19.99 through DB and €99.70 through Trip.com, and the same Munich–Vienna Railjet Express ranging from €44.99 to €59.49 depending on the channel. A passenger who takes the best price on each leg of a two-leg journey will often have to buy from two different sellers. Under the proposal as drafted, doing so costs them every right it creates. The result is a regime in which the most price-sensitive passengers are the least protected.

The proposal does prohibit sellers from segmenting a journey that could have been sold under a single ticket, which we welcome. But that **prohibition only binds a seller who was in a position to sell the journey whole**. Where a channel does not carry the other operator's service, no obligation arises, and the passenger simply has no protected route available to them.

A second limit on scope sits in the Regulation this proposal amends. Article 2 of Regulation (EU) 2021/782 allows Member States to exempt urban, suburban and regional services from rail passenger rights, and the proposal leaves that architecture untouched. A large majority of Member States still apply such exemptions.

⁷ Art.1(1)

This matters for cross-border journeys specifically. Very few journeys begin and end at a major international station. Many begin with a regional or commuter service that carries the passenger to the hub, and they end the same way.

The consequence is practical rather than theoretical. A passenger who cannot rely on the regional leg will drive to the hub instead, or drive the whole way, which is the opposite of what the Package sets out to achieve. OCU's April 2026 survey found that 48% of Spanish commuter passengers experienced frequent delays and 3% found their most recent service cancelled or never departed, on services that carry no punctuality guarantee at all.⁸

Recommendations:

- **Extend the rights in Article 12 to any journey whose connections respect the applicable minimum connection times**, regardless of the number of commercial transactions in which it was purchased.
- **Ensure that national exemptions under Article 2 of Regulation (EU) 2021/782 cannot apply to a service that forms part of a journey connecting to a long-distance or cross-border service**, so that protection covers the first and last legs of the journey unless that service is operated strictly for historical or touristic routes.

⁸ <https://www.ocu.org/organizacion/prensa/notas-de-prensa/2026/retrasostrenes010626>

3. Clear responsibility when a journey goes wrong

Two features of the proposal **risk leaving passengers unsure who owes them what.**

First, for journeys of 12 hours or more made up of several transport contracts under one single ticket, **compensation is calculated only on the individual delayed leg rather than the whole journey.**⁹ This limitation falls precisely on the long, multi-operator journeys the Package is designed to encourage.

Second, while the proposal usefully provides that a railway undertaking remains liable even when it entrusts a third party with handling a claim, and that the passenger must be told of that arrangement before purchase, it stops short of guaranteeing that the transfer will not slow or degrade the resolution the passenger actually receives.¹⁰ **Being told who will handle a claim is not the same as that claim being handled as quickly and fully as the liable operator would have handled it.**

Passengers also need to know what is happening to them in real time. OCU has called for operators to be obliged to inform affected passengers clearly and promptly of any incident, and to remind them of their rights as a delay lengthens, and for companies to hold contingency plans capable of reaching passengers stranded in remote locations after a train or track failure.¹¹ Both are practical gaps that become acute on cross-border journeys, where no single operator may regard the stranded passenger as its own.

A related problem is that passengers cannot always see what they are agreeing to. In our review of cross-border ticket sales, set out in our response on the Rail Ticketing Regulation, we found tickets sold with cancellation penalties that the selling channel did not specify, and fare conditions published only on separate linked pages rather than alongside the fare being bought. When something then goes wrong, a passenger who was never clearly told which terms applied, or which company stood behind them, is poorly placed to claim what they are owed.

⁹ Art.1(3)

¹⁰ Art.1(2)

¹¹ <https://www.ocu.org/acciones-colectivas/retrasos-trenes>

Recommendations:

- **Calculate compensation for single-ticket multi-operator journeys on total journey delay**, regardless of journey length, removing the 12-hour limitation.
- **Build on the proposal's transfer-of-liability provisions** by guaranteeing that entrusting a third party with a claim never reduces the speed or quality of resolution, not merely that the passenger is informed of the transfer.
- **Require prompt, proactive information** to affected passengers when an incident occurs, including a reminder of the rights that accrue as the delay lengthens.
- **Name the responsible operator explicitly and set and set quantified minimum standards for assistance and binding timeframes** for rerouting, meal assistance and overnight accommodation, and require operators to hold contingency plans for passengers stranded away from major stations.
- **Require operators and ticket vendors to give consumers access to a certified alternative dispute resolution (ADR) mechanism** that works across borders, covering not only automatic delay compensation but also proven consequential losses such as replacement transport, missed onward connections and accommodation.
- **Require Member States to sanction railway undertakings promptly** where delay-related non-compliance is repeated, and to report publicly on the enforcement action they take.



Conclusion

Euroconsumers supports the ambition behind this revision: that a single ticket should mean a single, protected journey, wherever it crosses an operator boundary. The evidence from our members in Italy and Spain shows that the ambition will only be realised if compensation is calibrated to the delays passengers actually experience and paid automatically, if responsibility during disruption is never in doubt, and if these rights are enforced rather than left to national timelines or operator goodwill.

Passengers are not the counterparty to a healthy rail sector; they are what makes one possible. A railway that people trust enough to choose over flying or driving is the entire objective of this Package, and it is consumer confidence, earned through rights that work, that turns that ambition into ridership, revenue and a genuine shift to sustainable mobility. Euroconsumers and its member organisations remain at the disposal of the Commission, Parliament and Council to support this work with further evidence as the legislative process continues.



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