UITP EUROPE

→ Position

Multimodal Booking: the view of the local & regional public transport sector



Table of contents

Executive summary 3

Main challenges of the proposal 4

Scope: Exemption for all MDMS at the local level 4

Neutral display and ranking criteria 5

Sharing of marketing data 7

Data sharing with public authorities 8

Reporting obligations: as little administrative burden as possible 9

Date of application 9

Conclusion 9

Executive summary

UITP Europe represents local and regional public transport authorities and operators providing regional, suburban and urban public transport services across Europe. UITP represents both the transport operators (PTOs) and the transport authorities (PTAs). Most of our members operate their own online ticketing services locally or at regional level.

UITP fully supports the European Union's objective of making travelling across the EU easier and improving the digital ticket distribution of all transport modes. Our members' main concern from a PTA's point of view is that they are still able to use their own ticketing platforms as a public policy tool at local and regional level and choose the default ranking criteria they need to accomplish their mission. Moreover, local ticketing distribution should not be affected by the proposed EU regulation, which focuses on fair competition between platforms at national and EU level.

Our members are ready to engage constructively with the proposal for a Regulation on multimodal booking (COM 2026 - 231) and express their position in this present paper.

Regarding the proposal on Rail Ticketing and the proposal on Rail Passenger Rights (the Single Ticket), please refer to our respective UITP position papers.

Main challenges of the proposal

The Commission's objective to create a fair level playing field for multimodal digital mobility services (MDMS) providing travel information and tickets from all transport modes is a legitimate endeavour. Making transport offers available on multiple platforms in a fair manner might help citizens get all the information they need when planning a trip and choosing a means of transport. We support the inclusion of environmental data in this proposal.

UITP also explicitly support the Commission's approach to keep local MDMS providers out of the scope, as local ticket distribution falls under the subsidiarity principle and the proposal would put too much burden on smaller local stakeholders. However, the proposal currently does not consider local B2B MDMS, which should be equally exempted. The proposal also limits the freedom of MDMS providers which are public transport authorities to be able to rank the results according to their own public policy criteria. Finally, we suggest some small improvements to the mandatory emission ranking, amongst other things by tying the present proposal better to the timeline of the CountEmissionsEU Regulation[1], and invite policymakers to consider the level of administrative burden of this proposal.

Below, we outline our concerns and possible solutions in more detail.

Scope: Exemption for all MDMS at the local level

The European Commission exempts local transport apps (multimodal digital mobility services, MDMS) from the scope of this regulation. UITP and our members strongly support this. However, the exemption in Article 2(1)(a) applies only to business-to-consumer (B2C) MDMS, while in reality a few local operators or authorities also have activities that would make them qualify as business-to-business (B2B) MDMS, e.g. selling tickets to travel agencies, concert venues, etc. As the proposed legal framework is especially stringent for B2B platforms, the text in its current version would cause a heavy burden on some local stakeholders, while their share of the European B2B ticketing market is comparatively small.

[1] Regulation (EU) 2026/1030 of the European Parliament and of the Council of 29 April 2026 on the greenhouse gas emissions accounting of transport services

UITP suggestion:

Extend the exemption foreseen for local B2C MDMS in Art. 2 (1) (a) to local B2B MDMS, by mirroring the exemption in Art. 2 (1) (b).

- Amend Art. 2 (1):
  This Regulation applies to:
  (a) providers of business-to-consumer multimodal digital mobility services when they offer transport products to end users in the Union, for journeys within, to or from the Union, except for transport services whose principal purpose is to meet the transport needs of an urban centre or conurbation, including a cross-border conurbation, or to meet the transport needs between such a centre or conurbation and the surrounding area.
  (b) Providers of business-to-business multimodal digital mobility services when they offer transport products to business users in the Union, or when the transport product's underlying transport service is provided, wholly or partially, within the territory of the Union***, except for transport services whose principal purpose is to meet the transport needs of an urban centre or conurbation, including a cross-border conurbation, or to meet the transport needs between such a centre or conurbation and the surrounding area***.

Neutral display and ranking criteria

According to Article 7, B2C MDMS providers and B2B MDMS providers shall apply the criteria outlined in paragraph 5 to rank the transport products and combinations of transport products on a non-discriminatory basis to all transport operators. UITP supports the general approach of fair and neutral ranking. However, the list of criteria is a closed list, leaving no room for public transport apps (such as B2C MDMS operated by a public transport authority) to display search results according to their own criteria, which could be "most space available" or "seat availability" or "direct connection", etc. to spread travellers equally across the available capacity in public transport or nudge people to travel off-peak. New additional criteria would remain neutral and non-discriminatory.

MDMS providers are also required to enable ranking according to GHG emissions or CO2 equivalent emissions data. In our opinion, the display of GHG emissions should be expressed in one common unit (not GHG emissions and/or CO2 equivalent emissions). We would like to point out that the Count Emissions EU Regulation (Regulation (EU) 2026/1030) enters into force only on 2 December 2030 and that, prior to that date, the emission calculations are not fully comparable.

Operators that cannot or do not yet provide CO2 emission data would be displayed at the end of the ranking list when results are ranked on the basis of GHG emissions or CO2 equivalent emissions. It is not clearly stated in the text whether this penalty applies only in cases where the GHG emissions or CO2 equivalent emissions are the *sole* criterion for the ranking (in which case such a mechanism may be acceptable) or whether this penalty also applies to searches where a combination of criteria is used for the ranking, one of which being GHG emissions or CO2 equivalent emissions. In the latter case, it would not be justified to display operators at the very end, as the other criterion/criteria should also play a role in the ranking.

UITP suggestion:

Add a sentence in Article 7 (5) which allows MDMS operated by public authorities to rank the results, in addition to the possible criteria listed in this same article, according to their own public policy criteria.

Clarify that the obligation to display and allow a ranking according to GHG emissions or CO2 equivalent emissions applies only once the CountEmissionsEU Regulation is fully applicable.

Clarify in Article 9 that operators who do not provide GHG emissions data or CO2 emissions data would only be displayed at the end of the list when the ranking is done *solely* based on GHG emissions or CO2 equivalent emissions.

- Amend Art. 7 (5) second sentence (new):
  When displaying transport products or a combination of transport products, B2C MDMS providers and B2B MDMS providers shall by default rank the transport products or combinations of transport products based on one or more of the following criteria:

  (a) final price;

(b) travel time;

(c) greenhouse gas (GHG) emissions;

(d) CO2 equivalent emissions;

(e) Products including a single-leg transport service ranked by departure time;

(f) Products including stops and available subsequent connecting transport services, ranked by departure time and total travel time;

(g) Accessible transport services for persons with disabilities or reduced mobility.

When a B2C MDMS or B2B MDMS is operated or overseen and controlled by a local or regional public authority, it may by default rank the transport products or combinations of transport products according to its own public policy criteria, provided that these criteria are neutral and non-discriminatory.

- Amend Art. 9 (3):

  When ranking transport products or a combination of transport products ***solely*** on the basis of GHG emissions or CO2 equivalent emissions, B2C MDMS providers or B2B MDMS providers shall display the transport products or combination of transport products for which such information is not available at the end of the ranking. Where information is only partially available for a part of the journey, B2C MDMS providers or B2B MDMS providers shall display that product in the ranking order lower than the display of transport products or a combination of transport products for which all information is available.

Sharing of marketing data

Article 8 states that when marketing, booking, or sales data is provided by a B2C or B2B MDMS provider at the request of a transport operator, it must also be made available in a timely manner to all transport operators with whom that provider has entered into a commercial agreement. While UITP does not oppose this approach, it demands that legislators bring more precision on the targeted data in order to provide a safeguard so that this obligation does not involve commercially sensitive information.

UITP suggestion:

- NEW Art. 8(1a):
  The data sharing requests referred to in paragraph 1 shall be granted only if they do not require the disclosure of trade secrets or information that could reveal commercially sensitive business activities or undermine competition.

Data sharing with public authorities

Article 10 of the proposal establishes the right of public authorities to request passenger volumes data from B2C MDMS providers that are active in their territory. UITP supports this article and suggests a few elements for improvement. Authorities would be interested in data about trips taking place within their territory but also commuting into or out of this territory. The details about which data is provided to authorities in which format and within which timeframe are not specified in the current regulation.

UITP suggestion:

Include several details in the legal text to make the provision of data to public authorities clearer and therefore more dependable.

- Amend Article 10 (1):
  Upon request of a public transport authority, and provided that they offer transport products ***into, out of or fully*** within the territory under the responsibility of that authority, B2C MDMS providers shall transmit passenger volumes data in each transport mode covered by the MDMS. Such data shall be used exclusively to improve the effectiveness of public transport policies and sustainable mobility policies falling under the responsibility of that authority. The data shall be aggregated and anonymised***, providing information at the level of granularity useful to analyse ridership on specific lines, in specific periods, and per mode. The data shall be provided in machine-readable format within a reasonable deadline***. B2C MDMS providers shall only be required to share data

already in their possession and shall not be obliged to produce new data in response to a request from a public transport authority.

Reporting obligations: as little administrative burden as possible

In Article 4 (1) B2C MDMS providers shall, each year, inform the Commission and the member State of their establishment, of the number and value of tickets sold per transport mode per year per Member State. We understand the Commission's wish to get more data about sales volumes and sales channels. As long as local B2C and B2B MDMS, as well as small and medium enterprises (SME) are exempted from the scope under Article 2 paragraphs (1) and (3), UITP can support this proposal. However, it could also be an option to collect such data only from those service providers approaching the Annex I thresholds.

Date of application

Considering the impact the new regulation would have on ticket sales platforms, requiring adaptations to their IT systems, algorithms and contractual relations, the date of application to be determined for this regulation should not be too short.

Conclusion

The proposal on multimodal digital mobility services is relevant for UITP members as many public transport authorities and public transport operator are also B2C or B2B MDMS. UITP Europe is ready to work with policymakers to achieve a balanced legal text that improves multimodal planning and booking opportunities for citizens but remains proportionate, particularly for local and regional public transport companies and authorities. Multimodal digital ticket distribution should develop under fair conditions where it has the highest added value for European citizens, while local public transport policy remains with the authorities responsible for it.

A European market for multimodal digital mobility services requires neutral, comprehensive travel information and a fair business environment in which all modes, public transport included, are displayed on equal terms. On the other hand, public

authorities should remain free to setting default rankings that serve their mobility policy objectives.

The text as drafted today includes an obligation to rank transport products based on emissions data that will not be comparable before December 2030 while penalising operators that do not disclose such data (yet). It also leaves the authorities' right to passenger volumes data without the precision needed to exercise it. This weakens the role of public transport authorities' digital services and data as tools of local and regional mobility policy.

UITP Europe therefore urges the co-legislators to amend the proposal along the lines set out above.

Contact persons

Annika Degen | annika.degen@uitp.org

Arthur Marsande | arthur.marsande@uitp.org

FIND ALL UITP KNOWLEDGE ON
MYLIBRARY
.UITP.ORG

This is an official publication of UITP, the International Association of Public Transport. UITP represents the interests of key players in the public transport sector. Its membership includes transport authorities, operators, both private and public, in all modes of collective passenger transport, and the industry. UITP addresses the economic, technical, organisation and management aspects of passenger transport, as well as the development of policy for mobility and public transport worldwide.

This publication was prepared by UITP EU Committee.

© UITP - All rights reserved - Responsible Publisher: Mohamed Mezghani,
Rue Sainte Marie 6, B-1080 Brussels, Belgium

Rue Sainte-Marie 6, B-1080 Brussels, Belgium | Tel +32 (0)2 673 61 00 |
info@uitp.org | www.uitp.org