



ALLRAIL

The Future of Passenger Rail

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IIIR (International Independent Rail Association) is the European non-profit association of independent passenger rail companies – THE PPPPPP PPP PPPPPP PPPPPP PPPPPP



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Regarding the proposed Amendments to Regulation (EU) 2021/782 (rail passenger rights)

Art. 30a - requires RUs, station managers, ticket vendors, and tour operators to ensure PAX can keep written electronic correspondence on a durable medium (with time and date), as well as quick and effective means of communication.

- **Benefits:**

- Builds passenger trust, aiding new entrants in establishing reliability;
- Leveling the playing field ensuring both state-owned incumbent and new entrant operators maintain accessible and reliable passenger interaction.

- **Challenges:**

- Possible additional administrative burden for new entrants and needed investment in customer service technology.

Art. 32a - National Enforcement Bodies (NEBs) are to develop a PAX rights compliance monitoring program with audits, inspections, interviews, document verification, and unannounced checks for RUs, station managers, TVs and tour operators. NEBs will prioritise these based on a risk assessment informed by complaints and other data, conducting assessments every two years (and one year after the Regulation becomes applicable).

- **Potential benefits:**

- By emphasising a risk-based approach, this amendment could reduce compliance burdens for new entrants that maintain high standards, as inspections would theoretically target entities with higher compliance risks.

- **Challenges:**

- Unannounced inspections and document verifications may disproportionately impact small operators or ticket vendors with limited administrative resources, as they may lack the capacity to handle extensive audits or meet short-notice compliance demands.

Art. 34a - Member States will share data regarding compliance with the Regulation with the European Commission. The Commission can request NEBs to investigate non-compliance by RUs, infrastructure managers, station managers, TVs and tour operators.

- **Benefits:**

- Greater transparency and consistency across Member States;
- May incentivise ticket vendors and operators to collaborate with NEBs proactively, potentially helping to anticipate and resolve compliance issues faster, and building regulatory goodwill.

Several challenges remain

- Private individual motor car : 82% market share in the EU
- To achieve modal shift to sustainable modes of transport,
 - Passengers need certitude that they will get to their final destination (delay, cancellation)
- Missed Connection Protection
 - All ground transportation, including first and last mile;
 - Technically enabled by a standard referred to in EU legislation;
 - Should become a mandatory agreement – not just known to rail enthusiasts;
 - For both through tickets in 1 transport contract and combined journeys of 2+ separate tickets in same travel chain ensuring that minimum connection times (25-30 mins) are adhered to, allowing all passengers—including seniors, people with disabilities, and families—to comfortably transition from one platform to another.



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