

> *Position*



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About STA

The Smart Ticketing Alliance (STA) is an international organisation promoting dialogue on public transport ticketing amongst stakeholders, driving the harmonisation of various ticketing systems and, overall, contributing to cross-border ticketing.

STA brings together public transport authorities, operators, ticketing organisations and industry stakeholders to exchange expertise and develop common approaches to interoperable ticketing. Through this cooperation, STA works to bridge differences between national and regional ticketing environments, promote greater technical and organisational interoperability and facilitate seamless passenger journeys across national, administrative and fare-system boundaries.

On the one hand, the STA covers around two third of public transport ticketing in Europe through its member organisations in the public transport sector; on the other hand, it counts companies in the public transport ticketing industry amongst its members.

The STA is based in Brussels.

Our position on the Passenger Package

In May 2026, the European Commission published its proposals on the EU Passenger Package.

The STA expressly welcomes the fact that the EU intends to take steps to facilitate seamless travel, including through simple, seamless ticketing for passengers. It is the STA's founding mission (and remains its primary objective to this day) to enable 'seamless travel' across borders – not just national borders, but often also administrative boundaries or the boundaries of fare zones – through 'seamless ticketing'.

When striving to achieve 'seamless travelling' through EU regulation, it is important to realise that ticketing in rail transport (particularly on long-distance services) works completely differently and follows a different logic to that of local and regional public transport; this differentiation must be made due to the technical and organisational differences between rail and local or regional public transport.

Differences in ticketing between rail and local transport – some examples:

- Long-distance rail travel generally involves single journeys. Tickets are usually valid for a specific route or train and often include a seat reservation.
- In local and regional public transport, commuters often make up the largest group of passengers and, as such, usually hold zone-based season tickets that allow them to travel as often as they like, even on different routes within the fare zone.
- In rail travel, paper tickets – or, if they are digital, in the form of barcodes – are the norm.
- By contrast, in local and regional public transport, particularly in metropolitan areas, smart cards are common (often with gates for access control). There are even local or suburban rail services where access to stations is controlled by gates that can be opened with smart cards.
- There are several technical standards for ticketing in local and regional public transport. Many existing ticketing systems in Europe were actually developed as dedicated technical solutions, which is why technical harmonisation in this area is exceptionally challenging.
- On rail services, it is common to have on-board staff. The intervals between stations tend to be longer. Both of these factors create a completely different set of conditions for ticket inspections. By contrast, on local or regional public transport, inspections must be able to be carried out in a matter of seconds, which consequently leads to different ticketing solutions.

Having said this, the STA recommends that the regulation be restricted solely to rail transport and to tickets which fall within the sphere of rail transport.

Ticketing procedures originating from local or regional public transport which do not correspond, either technically or organisationally, to the principles of rail ticketing should be explicitly excluded from the regulation.

In addition to this, it is important to emphasise the following:

If platforms resell tickets for local or regional public transport, they are only technically able to do so if they use or integrate with the ticketing technology of the transport operator issuing the tickets. That is why platform operators must be able to use precisely this technology when reselling these tickets, as otherwise the tickets would be technically unusable by the passenger.

If the regulation was to be implemented without this exemption, there would be two main risks:

- Its implementation will fail in practice, as overhauling regional ticketing systems (including station gates) is practically impossible and, above all, unaffordable.
- Existing integrated fare schemes, which currently enable passengers in many major cities and regions across Europe to travel intermodally and seamlessly, could be scaled back or abolished iff stand-alone local or regional rail tickets had to be introduced in parallel to the integrated public transport tickets.

STA suggestion

Based on our experience with ticketing systems in Europe and in order to mitigate these risks, the STA highly recommends amending the following points of the proposed regulation:

1. Regulation on Multimodal Booking

We recommend that in the Regulation on Multimodal Booking, **Article 6(1) point (c)** ('impose an obligation to accept specific technical equipment or software') should be deleted.

Article 6 / Conditions for commercial agreements between B2B MDMS providers and business users

1. Commercial agreements between B2B MDMS providers and business users shall not intentionally or otherwise:

(a) hinder or prevent a business user from subscribing to or using effectively any other similar system;

(b) require the acceptance of additional conditions which are not necessary for the subscription to the B2B MDMS;

~~***(c) impose an obligation to accept specific technical equipment or software;***~~

(d) impose any other unfair or unjustified conditions.

2. Regulation on Rail Ticketing

We recommend that in the Regulation on Rail Ticketing, in the **second subparagraph of Article 4(1)**, the phrase ‘provided that tickets for the relevant railway service are made available and can be purchased as a stand-alone rail product’ should be deleted.

Article 4 / *Obligation to provide content to online ticketing service providers (sharing obligation)*

1. A railway service provider shall conclude a commercial agreement with a requesting online ticketing service provider for the purpose of providing content for the display, re-linking, resale or distribution of its rail products.

The agreement referred to in the first subparagraph shall not cover tickets that allow their holders to travel on multiple transport modes, ~~provided that tickets for the relevant railway service are made available and can be purchased as a stand-alone rail product.~~

A railway service provider shall enter into negotiations for the conclusion of the agreement referred to in the first subparagraph within two months of receiving the request of the online ticketing service provider. Unless otherwise agreed between the parties, the agreement shall be concluded within eight months from receiving the request.

2. Subject to any decision pursuant to Article 11(5), paragraph 1 of this Article shall not apply where the requesting online ticketing service provider refuses to comply with the conditions required by the railway service provider in accordance with Article 6(2).

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