European Commission Impact Assessment on the development of Multimodal Digital Mobility Services (MDMS) and a Single Digital Booking and Ticketing Regulation (SDBTR)

Non paper by the Netherlands as informal contribution to the EC's ongoing Impact Assessment

Introduction

The European Commission (EC) is working on an impact assessment with a view to develop new proposals on the development of multimodal digital mobility services (MDMS) and a single digital booking and ticketing regulation (SDBTR) in the autumn of 2025. Such initiatives would help improving multimodal transport and facilitate open booking for trans-European journeys. In our increasingly connected world, seamless and multimodal door-to-door travel is crucial not only to improve the mobility of citizens, but also to contribute to wider policy goals such as sustainability, accessibility, inclusivity and efficiency.

Recommendations for future SDBTR legislation

With a view to the EC's aim to facilitate open booking for trans-European journeys and an upcoming SDBTR proposal, we suggest to focus in particular on cross border long distance passenger rail services, taking into account the principles of subsidiarity and proportionality. This will help boosting the attractiveness of international rail traffic to compete with short-haul flights and will also help to improve international connectivity. Furthermore, it is important that passenger rights are guaranteed for the whole trip. In this respect it is recommended to relate an upcoming proposal on SDBTR to the current obligations regarding rail passengers' rights[1], especially in the field of through ticketing and enforcement.

For the development of a trans-European rail ticketing system it is important to establish uniform conditions and technical standards at European level embraced by all railway operators and third party ticket vendors. A first step is to establish at European level technical standards for data exchange, as currently discussed in the Railway Interoperability and Safety (RISC) committee concerning the EC's proposal on Technical Specifications for Interoperability (TSI) Telematics.

The Ministerial Platform on International Rail Passenger Transport (IRP), set up in 2020 following the June 2020 Ministerial Declaration on international railway passenger transport and co-chaired by the Netherlands and Austria, has paid a lot of attention in its various progress reports to customer experience and digitalization, including the development of a trans-European rail ticketing system. For recommendations, conclusions and lessons learnt on this topic we refer to the fourth IRP progress report of 12 June 2024[2] and the fifth IRP progress report of 26 May 2025[3]. In its fifth progress report the Platform concludes that "the ongoing development and implementation of common data standards are vital steps that must continue without delay. For reasons of efficiency, standards should be further developed in a complimentary rather than in a competing fashion".

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[1] (EU) 2021/782

[2] IRP Fourth Progress Report - PR EU, Brussels | The Netherlands and PR EU, Brussels, Chapter 3

[3] Fifth Integrated Progress Report | Report | Government.nl

Besides the importance of standards, it is important to set conditions to create a level playing field. In this regard, setting FRAND (fair, reasonable and non-discriminatory) conditions is very relevant. This means that transport operators should be willing to sell their services through third parties. At the same time, interested parties should share certain data with transport operators, as to optimize services. An example of setting FRAND conditions in the Netherlands are the so-called 'MaaS worthy concessions'[4]: an agreement between public transport operators and authorities on requirements for fair (re)selling of tickets by third parties. It should be ensured that reselling of tickets of transport operators by third parties can take place under transparent, non-discriminatory and competitive conditions in order to guarantee a level playing field. These concessions also include rules on the exchange of mobility data and liability related to complaints and restitution. Given the rapid dynamic developments in the field of MaaS, these conditions are flexible in the sense that they can be updated periodically. In the end the conditions for the reselling of tickets in 'MaaS worthy concessions', such as the main rail network concession, are transparent, non-discriminatory and competitive. These conditions are stipulated in article 44 of the main rail network concession[5]. Moreover, the concessions describe requirements for public transport operators to share mobility data with public authorities for policy purposes. Additionally, a mechanism for dispute resolution can greatly benefit the development of MaaS.

Recommendations for future development of MDMS

To support the development of a robust and future-proof MDMS and SDBTR framework, fostering an open, fair, and integrated mobility market in Europe and further development in public-private cooperation is essential. The Dutch Mobility-as-a-Service (MaaS) program has demonstrated the added value of structured cooperation between public authorities and private mobility providers. The importance of improved data access, interoperability, and user-oriented multimodal services has been recognized. It enabled the integration of shared mobility and public transport through clear agreements on data exchange, quality, and access conditions. Thus far, the collaboration has been non-committal, however forthcoming European legislation concerning MDMS could prove instrumental in formalizing and sustaining this partnership on a more structural basis. Frameworks like the open-source City Data Specification for Mobility (CDS-M) show how municipalities and service providers can jointly develop policy-relevant mobility insights while respecting commercial freedom. As indicated by the outcomes of the impact scan (2023), to enable cooperation between mobility providers and MDMS conditions should be attached to cooperation on quality and connection costs. In addition, certain freedom remains necessary on what commercial arrangements parties can make in the process.

In parallel, standardization remains a prerequisite for interoperability and scalability of MDMS across borders. The Netherlands supports the use of open standards or non-proprietary recognized standards, such as the TOMP-API, which facilitates booking, payment, and planning between MDMS and transport operators. Rather than imposing a single standard, the EU should promote convergence and compatibility between existing ones—and explore setting minimum interoperability requirements, obliging parties to support at least one recognized standard (e.g. TOMP-API or OSDM). In addition, standardizing contractual frameworks—such as the Open Wheels partner agreement—can accelerate cooperation and reduce transaction costs. Furthermore, investing in

[4] Kamerbrief eindrapportage NOVB | Kamerstuk | Rijksoverheid.nl
[5] Concessie voor het Hoofdrailnet 2025-2033 | Rapport | Rijksoverheid.nl

strengthening the alignment with existing National Access Points (NAPs) and European data spaces is as well crucial. Together, such technical and legal alignment will foster a level playing field and support the broader EU goals of seamless, sustainable and inclusive mobility.

Final comments

This paper is a follow up of a non-paper on MDMS of 26 June 2023[6], as response to a previous European consultation on this topic. This paper is drafted pending future EC's proposals on MDMS and SDBTR and it therefore does not present the formal Dutch position. It can therefore not prejudge any future decision making on future legislative developments.

[6] Reactie op wetgevend voorstel Multimodale Digitale Mobiliteitsdiensten (MDMS) | Rapport | Rijksoverheid.nl