

Targeted revision of Regulation (EU) 2021/782 on rail passengers' rights and obligations

Response to call for evidence

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Introduction

Pearle* – Live Performance Europe is the European federation representing employers in the live performance sector, including theatres, concert venues, festivals, and orchestras across Europe.

We welcome the Commission's initiative to revise Regulation (EU) 2021/782. Rail is vital to connecting people across borders, advancing the Union's sustainability goals, and ensuring the mobility of cultural professionals.

Musicians travelling by train in the EU often face inconsistent policies and practical difficulties, as the regulation leaves detailed rules to individual operators, leading to wide variation in how musical instruments are treated across rail companies and countries. These obstacles create uncertainty, additional costs, and limited protection in case of damage, discouraging artists from choosing rail and undermining cultural mobility.

We also support the aim to align this revision with the Single Digital Booking and Ticketing Regulation and the Multimodal Digital Mobility Services framework. Ensuring reliable, seamless rail travel is particularly important to the cultural sector, which depends on the free movement of artists and their musical instruments.

Below we set out our comments on the revision of the Rail Passengers' Rights Regulation.

Comments

Close the protection gap for combined tickets sold in one transaction

Pearle* proposes that multi-leg journeys bought in a single transaction are treated as through-tickets with full passenger rights. Exceptions should be limited, clearly disclosed in advance, and matched by equivalent protection from the seller.

Extend protection across operators

- Require rail companies to cooperate so that delayed passengers can take the next available train, and make these arrangements public.
- Set clear minimum standards for assistance and re-routing, including hotel accommodation if the next train is only available the following day.

- Clarify that liability is shared between operators, so passengers do not need to find out which company caused the delay.

Transparency and data for enforcement

The revision should require publication, in machine-readable form, of whether a multi-leg offer constitutes a through-ticket, the applicable conditions of carriage for each leg, and contact points for assistance. National enforcement bodies should receive data on missed-connection handling and resolution times to monitor compliance.

Recognise the mobility needs of cultural professionals travelling with musical instruments

While the targeted revision focuses on through-tickets, Pearle* urges the Commission to seize this opportunity to remove long-standing barriers faced by passengers travelling with musical instruments, which are currently treated only under general luggage clauses and vary widely by operator. To support a modal shift to rail for artists and touring companies, we recommend the following targeted, proportionate additions:

- Explicit recognition in the regulation that musical instruments are a distinct category of personal articles permitted on board, as they can be considered professional equipment, subject to reasonable safety limits.
- Minimum EU-wide baseline for acceptance in passenger areas for musical instruments within defined dimensions, without extra charge.
- Obligation to offer a workable solution for larger musical instruments (for example, the possibility to purchase a companion seat or to use a designated storage space), with transparent and reasonable fees.
- Publication duty: railway undertakings should clearly publish their musical instrument policies, including dimensions, fees, reservation requirements, and on-board storage options, in the same way as bicycle carriage conditions must be published.
- Service quality and staff training: include reference to appropriate handling of fragile, high-value personal items and provide simple guidance for train crews on accommodating musical instruments safely without obstructing aisles or exits.
- Liability clarity: provide an option to declare a higher value for registered carriage where offered, or require clear information on insurance options for high-value musical instruments.

These measures would harmonise expectations, reduce disputes at boarding, and make rail a predictable option for cultural workers whose musical instrument is their tool of trade.

Interoperability with digital ticketing frameworks

The revision should dovetail with the upcoming **Single Digital Booking and Ticketing Regulation and Multimodal Digital Mobility Services**, so that:

- Through-ticket status and passenger rights are determinable at the time of offer and carried in the digital ticket.
- Re-routing offers and assistance can be delivered digitally, across operators, with audit trails for enforcement.
- Ancillary conditions relevant to the journey (for example, bicycle or musical instrument policies) are exposed via standardised metadata in booking interfaces.

SME-friendly implementation

Many organisations in the live performance sector are SMEs and micro-enterprises planning complex itineraries for ensembles and crews. The rules should be simple to apply in procurement and touring logistics. Clear default protections, standardised disclosures, and capped ancillary fees will lower transaction costs without imposing disproportionate burdens on railway undertakings.

Conclusion

Pearle* strongly supports a targeted revision that ensures passengers who buy multi-leg journeys in a single transaction benefit from through-ticket rights across operators. This is essential to consumer trust, to a functioning Single Market for passenger rail, and to achieving climate goals through a shift to rail.

At the same time, the revision can make rail travel more attractive for cultural professionals by clarifying and modestly harmonising the carriage of musical instruments. A small number of precise provisions (explicit recognition, a baseline acceptance standard, transparent fees and published policies, and basic handling expectations) would remove uncertainty and costs that currently deter rail use for tours and performances.

We stand ready to contribute sector expertise and to engage with the Commission, railway undertakings, and digital ticketing stakeholders to ensure the final text is both practical and impactful for passengers and operators alike.