

April 29th, 2026

European Commission
President Dr. Ursula von der Leyen

Subsidiarity in SDBTR: Protect integrated public transport networks

Dear President Ursula von der Leyen,

With the publication of the legislative package on rail ticketing, passenger rights and digital mobility services fast approaching, we feel compelled to express the serious concerns of Europe's metropolitan transport authorities regarding the direction currently being taken.

As the public organisations that organise, finance and integrate the public transport networks of Europe's capital regions and large metropolitan areas, we are very pleased that railways play an important role in your vision for Europe and fully share the goal to make travel by public transport easier for Europeans and leverage the multitude of economic, social and sustainability benefits, that become especially clear with the current energy shock.

We would like to commend you on your stern effort to avoid unnecessary administrative burdens and your clear mission letter to Commissioner Apostolos Tzitzikostas, in which you explicitly highlight proportionality, subsidiarity and wide consultations as the key principles to ensure new rules are simpler and targeted appropriately.

However, at this stage, the approach adopted by the Commission's services seems to deviate from these very principles.

Transport authorities support the goal to reduce fragmentation of railway services, because their metropolitan experience clearly shows that the network effect works: Public transport is most successful in those city-regions, where fragmentation is reduced and services are integrated into a consistent network with a unified fare and one ticket for all public transport modes. In contrast to a traditional train ticket, these integrated tickets enable multimodal journeys and interchanges between trains, metro, tram and bus services across a respective region, which creates an offer that is more resilient and more competitive than any train, tram or bus network could ever be by itself.

In many of Europe's largest urban areas, transport authorities invest significant budgets and bear considerable economic risks to produce and fully integrate high quality regional- and commuter train services. These services are not profitable commercially but play a vital role in the local networks that enable tens of millions of – essential – journeys every day and thus create considerable economic and social benefits. The viability of these services relies precisely on local decision-making ability and public control over fares and ticketing.

By proposing a one-size-fits-all approach to rail ticketing, that would apply indiscriminately even to these profoundly different systems, the Commission will run the unnecessary risk of disintegrating train services and undermines the ability of competent authorities to organise unified public transport networks, which will weaken one of the most effective pillars of sustainable mobility in Europe.

This point is all the more sensitive given that the Commission's own consultations, notably in the framework of the Multimodal Mobility Forum and the Urban Mobility Expert Group, have clearly highlighted the value and specificity of integrated public transport networks as a tool to achieve Europe's transport objective. We believe the direction currently being taken ignores the lessons learned from the stakeholder dialogue and contradicts the principles highlighted in your mission letter unnecessarily.

EMTA's members are convinced that there is a better path that aligns more consistently with your political guidelines: An approach that explicitly recognises the value of multimodal public transport networks by excluding from the scope of SDBTR those regional rail services that are fully integrated into these networks.

In our consistent position shared with Commission services continuously, transport authorities have outlined that this very targeted exemption for fully integrated regional rail services would significantly simplify the implementation of the regulation and enable the achievement of the European objective of seamless sustainable transport, while preserving the integrity of the integrated public transport networks that are vital to the competitiveness of Europe's local economies.

The success of this legislative package will depend on its ability to build on successful existing realities rather than weakening them. In this regard, we urge you to ensure that the proposal your Commission will publish shortly respects **the principle of subsidiarity**, to guarantee the legitimacy and effectiveness of this important European action, by establishing a targeted exemption for fully integrated regional rail services.

We remain fully committed to constructive dialogue and collaboration with the Commission to achieve effective solutions that live up to Europe's ambitions for sustainable transport.

On behalf of Europe's metropolitan transport authorities,

Yours sincerely,



Erik Norling
President of EMTA

EMTA is the association of Europe's metropolitan transport authorities and currently joins 35 transport authorities from European capital regions and large metropolitan areas, that are home to 110 million Europeans. EMTA's members manage, finance, integrate and continuously develop the public transport networks that jointly serve more than 27 billion journeys each year and form the sustainable mobility backbones of Europe's most prosperous, competitive and liveable city-regions.