



Back-on-Track Europe a.i.s.b.l.

European network to promote cross-border and night trains
www.back-on-track.eu

The EU Passenger Package: A solid foundation in need of finishing touches

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Back-on-Track's position paper on the new ticketing regulations

In this paper, we first of all give our understanding of the legal framework that the European Commission is proposing to solve the issue of ticketing in Europe. Then, we explain our major concerns on topics which may prevent the regulation of achieving its goal of “one single ticket on one single platform and get passengers’ rights for the whole trip”, especially regarding a long-awaited extension of passengers to avoid costs induced by missed connections. We also give our concerns over some less important subjects, such as the 12-hour rule, which, given the complexity of the issue it addresses, is given significant attention. A few technicalities and loopholes are then explained. We finish by talking about other issues on ticketing and more generally on cross-border rail travel that this regulation will not tackle.

Our understanding

The issue

Three barriers currently prevent citizens from using any rail option for cross-border travel. First of all, operators have over the last decades shortened the length of their routes, targeting in particular night trains, so that travelers now need to take several connections to reach their destination. Moreover, travelers must hand-craft trips by finding and booking each leg separately on different websites. Finally, if they succeed in getting their tickets, **operators along the route won't cover missed connections** caused by another operator, potentially causing cascading delays and surprise costs for last-minute tickets or hotels.

The proposal aims, in short, to allow passengers to book tickets on a single website in a single transaction without having to worry about missed connections.

The proposed framework

The proposal addresses the issue of ticketing by, basically, **de-bundling the activity of distributing train tickets from the activity of [issuing train tickets](#)**, strengthening independent Multimodal Digital Mobility Services as intermediaries for the booking of train journey through the *sharing obligation*, while forcing the ticketing platforms of dominant railway undertaking to sell train tickets of competitors, increasing their visibility, through the *hosting obligation*. **The question of passenger rights is addressed by creating the legal concept of *single ticket***, a bundle of tickets bought in a *single transaction*, through amending the regulation 2021/782 on rail passenger rights.

The 12-hour rule

On top of the limitation of having bought the tickets in one transaction, a *12-hour rule* applies: **a single ticket for a journey longer than 12 hours does not give rights to compensation** (getting up to 50% of the value of the ticket for the delay) for more than the affected leg of the journey. **This limitation does not apply in the case where one of the tickets is a night train ticket**, as missing a night train is regarded by the commission as a bigger inconvenience than for a day train, due to the high risk of being stranded or the impossibility, in general, to just take the next train to destination. The commission regards this exception to the limitation as a way to promote night trains. **The other passenger rights in case of delays and cancellations - information, re-routing (taking another train to the destination, or another means of transportation, or canceling the journey), and assistance (having access to meals and refreshments and accommodation if necessary) - are not affected by this limitation.** This rule is understood as a liability cap for operators.

Grey areas

Back-on-Track is a volunteer-run organization, and as such admits having limited capacity to fully analyze the text of the regulation and its implications. In particular, it is not clear to us **how this regulation would apply in the context of Eurail and Interrail passes**, which, in the context of European journeys, are especially relevant, because Interrail and Eurail passes are tickets, but only seat reservations warrant transportation contracts. The same question can be asked for subscriptions such as Klimaticket or Deutschlandticket, as sometimes no seat reservations on regional trains can be made.

Back-on-Track notes that **the extension of the booking horizon to 5 months should be understood in [the framework of the new regulations on the management of infrastructure](#)**, which are meant to make this extension realistic. In the context of night trains, the reason why some night trains such as the train from Paris Austerlitz to Latour-de-Carol Enveight have very short booking horizons is the impossibility for the infrastructure managers to plan works in advance. Back-on-Track does not have the workload to check that the combination of these regulations will indeed allow this extension of the booking horizon to come into force in a meaningful way, since the proposed single ticket regulation will still allow railway undertakings to add trains on a horizon shorter than 5 months.

The question of how this new regulation will be applied to services which blurs the line between regional transportation and urban services remains for us unsolved. For example, the RER in Paris, which has “regional” in its name, is operated as an urban service inside Paris, and is critical for connecting railway stations. Such can also be said for the connection between Barcelona and Latour-de-Carol - Enveigt, run by Rodalies de Catalunya and critical to the connection between Paris and Barcelona by night train. **It is not clear if the regulation will make it possible for passengers to book such tickets online** - which would strengthen their passenger rights, especially in the framework of the single ticket - in spite of the fact that regions like Île-de-France - in the case of the RER - require passengers to buy a special physical medium to hold the ticket (if they do not possess a recent smartphone).

Back-on-Track's major concerns

The proposal does not guarantee the emergence of a single platform for booking

The issue

The European Commission addresses an issue, the distribution and issuing of cross-border train tickets, which is complex in nature, as train tickets are products which vary greatly across the continent and operators, due to the diversity of fares, applicable discount cards, offered services, and their distribution touches complex problems of data sharing. The approach taken by the European commission is seemingly to strengthen the position of Multimodal Digital Mobility Services (MDMS) in order to create a competition between distributors for solving this complex issue, while, at the same time, trying to increase the visibility of competitors of dominant railway. **This does not guarantee that one MDMS will emerge as capable of selling all European train tickets, due to the complexity of the issue.**

As the regulation requires nationally dominant platforms to sell all operators' tickets only as long as their trains touch their country, this does not yet make sure passengers will be able to book on their platforms a cross-border trip with connecting trains at each side. Nationally dominant platforms like SNCF connect or DB Navigator might fail to see a chance in selling all tickets from all operators, and private companies like Rail Europe or Trainline might choose to focus only on more simple products like seats in day trains. More complicated products like reservations for travellers with Interrail tickets and **particularly night trains,** offering a range of special options like women-only couchettes or breakfast, **might be missed out.**

Our proposals

Without any actor deemed as responsible for the distribution of all train tickets across Europe, it is entirely possible that such an actor does not emerge. **Within the framework of this regulation, the simplest solution would be to designate state railways as responsible for this.**

If such a solution still appears as too much of a strain put on national operators, this **obligation could be restricted to state operators having significant market share on the European scale** such as the SNCF or the DB.

If this proposal still is too much of a strain, it should be ensured that operators sell major connections, even if one of the legs starts outside of their geographical area of interest. The obligation could for example be extended to **journeys starting 100 km away from the border.**

Back-on-Track notes that this could also be the role of an agency of the European Union, especially as it may appear necessary at some point to **impose norms on fares in the European Union** to make booking more readable, but such a proposal would go far beyond the framework of this regulation.

The proposal still does not provide passenger rights for a lot of journeys because it bundles them with the single ticket

The issue

This package proposes an extension of passenger rights for passengers holding a single ticket. Yet, this extension of passenger rights was long awaited by passengers association, as right now, passengers are still at risk of paying for the costs of re-routing or accommodation induced by missed connections, notwithstanding the non-existent right to compensation. **This package needlessly bundles passenger rights to the existence of a *single transaction*, because it carries the**

assumption that a platform allowing passengers to seamlessly book any kind of combination of tickets (according to fares) will come to existence after this regulation. As noted above, due to the complexity of the distribution of train tickets due to the diversity of fares, it is not obvious that such a platform will emerge. In such a case, passengers having bought their train tickets on different websites, or even on different transactions on a single website, will not be covered by passenger rights. In other words, defects of booking systems will create a financial exposure of passengers for their missed connections.

Our proposals

Bundling the long-needed extension of passenger rights to multi-legs journeys is unnecessary, and can be done outside of the single ticket framework, by simply requiring railway undertaking to assist passengers holding a bundle of tickets (possibly bought in different transactions) respecting the minimum connection times, in the case of missed connections, even if they are due to other operators' failings. [Such a proposal is very similar to what should soon become law in France.](#) Railway undertakings should remember that transportation works as a network, and that they benefit from this network effect by the increase of the number of passengers it brings. The financial liability can still be given to the operator responsible for the missed connection.

Back-on-Track emphasizes that **the most fundamental rights of passengers - besides information - are the one which guarantee them the absence of costs induced by missed connection,** such as assistance and re-routing. Compensation should not be the primary focus of any extension of passenger rights, and Back-on-Track is open to the idea of a weakened right to compensation, outside of the *single ticket* framework, as long as **passengers are sure that delays do not induce costs.**

Back-on-Track also notes that the condition of "single transaction" is not in line with the original mandate from Commission president von der Leyen: "*one single ticket on **one single platform** and get passengers' rights for the whole trip*". If the European Commission does not want to extend passenger rights beyond the *single*

ticket framework, we propose that, at least, the **“one single transaction” requirement is changed into the original “one single platform”**, allowing citizens to build up trips over time on the same platform and to make any adjustments needed in concordance with the individual transport contracts. In the case where some legs have different booking horizons, or that some last-minute timetable changes make some trips impossible, this change would allow passengers to change their tickets accordingly.

Back-on-Track’s minor concerns

A 12-hour rules which both creates unlimited liability for some operators while still discouraging long distance journeys

The issue

An incomplete liability cap

Back-on-Track understands that the 12-hour rules set by the European Commission is thought of as a way to **cap the liability of operators** who will now be held liable for connections over which they have little control, and to avoid cascading effect where missing a connection for a regional operator would make it liable for a missed connection at the other end of Europe, which would be particularly unfair for small operators in European countries with generally lower prices.

Yet, Back-on-Track first of all notes that this liability cap is incomplete, as **it still creates financial exposure** to operators for costs such as assistance and re-routing. Furthermore, a passenger who encounters such a delay that they are allowed to cancel their onward journey and return at no cost would still be eligible for a reimbursement of their tickets in the name of the Article 18 of the regulation 2021/782, creating a financial exposure for operators which goes beyond the 50% value of the tickets. The exemption for night trains, on the one hand, is an incentive to include them in longer trips with many connections. On the other hand this exemption would lead to a **structurally higher liability risk for night train**

operators, as they are *a/ways* part of a longer journey including a night train. Higher liability risk leads to higher cost which might make using and operating night train services less attractive. Night trains operate in general with very thin margins which makes them even more vulnerable to unforeseen costs.

Finally, written as it is, the exemption creates strange situations where connections in journeys lasting more than 12 hours become suddenly fully covered by passenger rights if a night train has been used before the journey.

A disincentive to long distance journeys

The use of a metric as rough as the length of the ticket creates a situation where passengers engaging in longer trips get fewer rights than passengers using the train for shorter journeys. Back-on-Track acknowledges that its members represent a fraction of the population which is highly skewed toward doing long train journeys, and that the regulation aims at making train travel more workable for passengers doing train journeys for periods which are still comparable to a flight.

Yet, it would go against the goals of decarbonation of transportation to disincentivize long train trips, even if it means that passengers would have to engage in multi-day journeys. Achieving decarbonation of transportation means reducing the absolute value of GHG emissions; refusing to address the question of long intra-European flights because their replacement by a multi-day train journey is deemed “non-realistic” does nothing to cut their GHG. Back-on-Track fully acknowledges that multi-day journeys are harder to fit in a schedule than flights lasting a few hours, and its long-standing focus has been on the replacement of short and medium-haul flights by night trains. Yet, we think that replacing long-haul flights by train trips should be incentivized, not disincentivized.

Furthermore, putting such a short cap on the length of single tickets creates a situation where journeys which are perfectly doable in a day are not covered by the right to compensation for a single ticket. Such an example is the journey from Paris to Vienna, whose length oscillates between 10 and 14 hours depending on the route. Passengers would be incentivized to take journeys with snap connections, which are unrealistic regarding the punctuality of some operators, in order to be covered. Travellers living in smaller cities, who generally need to have a connection in a bigger city for long distance journeys, will on average have fewer rights than

passengers living in a hub. There would be connections from Paris to Vienna which could be covered by the 12 hours rule, while almost no connection from Paris to Graz would be covered.

Our proposals

On the question of liability

Back-on-Track tries, as much as it can, to be sensitive to the point of view of operators, which need to make a profit in order to run trains. **Therefore, we understand that a cap on the liability of operators can be needed.**

One solution to the problem of liability for the costs of assistance and rerouting for smaller operators could be to put a more severe cap, where not only the right to compensation but also the right to assistance and rerouting are capped to 12 hours single ticket. Such **a hard liability cap, while potentially attractive to operators, would put passengers, who are the weakest party, in an even worse position than before the regulation**, and would be an even stronger disincentive for long train journeys.

Back-on-Track notes that the problem of operators becoming liable for connections they have not chosen to guarantee is inherent to the European framework of the liberalisation of rail transportation. While the railway network is still controlled by state-owned infrastructure managers, no state-level entity is in charge of the train network which effectively runs on it and liable for the financial aspects of how the cost of running trains is passed on either to the passenger or to the taxpayer. In a country like Switzerland, where only the SBB CFF FFS are liable for running trains on the territory, **the question of liability for missed connections does not exist, and such used to be the case when only state railways were meant to run trains.** The point of such a remark is not to bemoan the liberalisation of rail transportation, on which Back-on-Track has no opinion, and which has led to the emergence of companies such as European Sleepers who are more inclined than some state operators to run night trains. **We only want to point out that without any actor naturally liable for missed connections between two competitors, shifting the**

liability to the delayed operator looks like the lesser evil, as the other parties - the MDMS or the passenger - are weaker, and even less responsible for the situation.

On handling long distance journeys

A first idea, in order to have a simple rule which is both fairer to passengers and to night train operators, would be **to extend the length of the liability cap to 18 hours, and to 36 hours in the case where the single ticket includes a night train**, as it would include most of day journeys and journeys that Back-on-Track considers, thanks to the experience of its member, as realistically doable with only a single night train (departing on the day before, arriving on the day after, such as a trip from Bucuresti to Brussels). Back-on-Track also acknowledges that, in practice, long distance travellers need to put buffers in their journeys in order to be able to avoid cascading effects. If this liability cap only is about compensation, it is understandable that a 50% compensation for a 2 hours delay on a 36 hours journey is already quite a good compensation with regards to the inconvenience. It is always possible to find situations where such a rule may seem ill-fitted to the reality of the journeys of travellers, but there would be far fewer such situations than with a 12 hours cap.

Another way to compute the liability cap could be to cap the **compensation to 50% of the price of train tickets departing in an 18 hours window after the departure of the train of the delayed operator**. With such a cap - which would also incentivize railway undertakings to engage in longer train journeys -, passengers having longer train journeys would still be covered for compensation regardless of the length of their journeys.

Another proposal would be to try to have a more detailed approach to what multi-days journeys look like, and to what exactly needs to be compensated, by **taking a day-by-day approach to compensation, where passengers would be compensated only for the trains of the day**.

This regulation could be the opportunity to reflect on what long train journeys look like, and on how to provide passenger rights which are both fair to passengers and to railway undertaking. **Back-on-Track welcomes the fact that the current regulation acknowledges the particular case of night trains for long train**

journeys, but more could be done to define how they can contribute to long train journeys. In the context of passenger rights, night trains both reduce the need for hotel nights for passengers who would otherwise have been stranded by missing the last train of the day, while at the same time shortening the gap between the last train of the day and the first, a gap which adds delays for stranded passengers which go far beyond the maximum 2 hours currently considered for compensation, reaching easily 10 hours.

Finally, of course, it can be considered removing any liability cap for compensation, because, as said above, operators are already exposed to costs for other rights such as assistance or rerouting.

The need for a fair governance of Minimal Connecting Times

The issue

In order to be a valid single ticket, a bundle of tickets need to respect the Minimal Connecting Times (MCTs) between trains. MCTs are proposed to be in the hands of station and infrastructure managers. Connection times should cover walking between platforms, but also sometimes taking public transport between stations. Therefore a time buffer should be added depending on the connection distance and delay statistics to reduce the probability of missed connections. . **In particular night train operators do often need more time** for a check-in when entering the train and they bear a higher risk of accumulating delays due to the longer distances they cover and due to crossing borders. This increases their liability risk, when continuing the journey with another train.

Our proposals

We propose that operators should be allowed to ask station and infrastructure managers for **additional connection time buffers for their service type**. Station and infrastructure managers must, of course, only consider reasonable extensions.

Make re-routing practical

The issue

A passenger affected by a missed connection needs a pragmatic journey continuation solution to limit the impact of the incident, and operators should have a mutual interest in minimising additional costs (hotels, compensation...) for the liable operator. This is the core motivation for existing voluntary schemes like Agreement on Journey Continuation (AJC). **The proposal, written as it is, imposes the re-routing obligation only onto the operator whose connection has been missed. Such an obligation is ineffective for small operators**, which may run a route only once or twice a day, especially in the case of night trains. If the proposal does not force the operators to broadly cooperate for helping passengers affected by a delay, the only improvement to the current situation will be that passengers will have increased rights to compensation and being repaid for rerouting, but will face operators which refuse to acknowledge the existence of each other and to help passengers having missed connection between two different operators.

Our proposals

To avoid that passengers need to learn when and when not operators do agree on schemes like the AJC, the **regulation proposal should extend such a scheme to all operators, by requiring all operators to cooperate for re-routing.**

As far as Back-on-Track understands, the marginal cost of accepting a delayed passenger on a train is only the opportunity cost of not selling the seat to a last minute passenger, which is zero when the seat is dedicated to passengers having missed a connection. **Therefore, it would be possible to force operators to issue zero-cost tickets for passengers affected by a missed connection without affecting their profitability, and avoiding the need for a more complicated system of compensation between operators.** Only the eventual costs of assistance, reimbursement and re-routing through other means could be pushed to the liable operators.

The booking platform's role as the main information contact for stranded passengers should also be clearly defined, to make sure that the right to information of passengers is guaranteed, and they should be proactive in the re-routing.

Finally, Back-on-Track wants to insist that the quality of the re-routing should be considered, and **that a passenger who has missed the last day train of the day should not be forced to accept reroutings which do not involve at least a couchette when they are a 2nd class passenger, or higher if they have a 1st class ticket**. This means that when a stranded passenger only has the possibility to take a night train in seated accommodation, or day trains which run at night (possibly involving connections at times such as 2 a.m), they should be given the possibility to stay at a hotel without prejudice to their other rights.

Technicalities and loopholes

Availability of seats

The issue

The practical possibility of rerouting is bound to the availability of seats by operators. Some operators tend to have 100% occupation, having very little slack capacity in the case of missed connections, and therefore would contribute far less to the resilience of the transportation network.

Our proposals

Operators could be required to keep a certain percentage of slack capacity to ensure that the transportation system remains resilient, beyond seats which are already dedicated to passengers having missed a connection. Such a percentage could be adjusted by station and infrastructure managers in order to have a limited amount of stranded passengers or standing passengers. It is in the interest of all

operators that passengers are sure that they will reach their destination in good conditions, beyond immediate profit.

User interfaces

The issue

With the diversity of fares and possibilities of accommodation, especially night trains, a case can be made on the difficulty to have the right user interface.

Furthermore, dominant railway undertakings with a hosting obligation might act in bad faith and design a bad user interface for their competitors. Even in good faith, user interfaces can be difficult to get right.

Our proposals

Such an issue is related to Back-on-Track's major concern that possibly no one will sell all the train tickets in Europe. If it is possible that the dominant railway undertaking of the most populated countries in Europe, like France and Germany, may have the budget to design a proper interface, it may still be that on specific sectors, such as night trains, independent platforms are more efficient. **This explains why Back-on-Track is critical of the idea of bundling passenger rights to a single transaction or a single platform, as it is sometimes easier to book tickets on different platforms.** Yet, Back-on-Track does not think that it is impossible for platforms to at least display all fares and options, even if the user experience might be bad.

Related issues on ticketing that this regulation will not solve

True multimodal booking

The issue

In spite of its name, the proposition tackles mostly the booking of train tickets, which Back-on-Track indeed regards as a very important issue, especially in its area of interest. Back-on-Track still acknowledges that this proposal does not really tackle [the question of how journeys involving multiple modes of transportation should be booked](#), because, as far as Back-on-Track understands, no extension of passenger rights for multimodal booking—such as a Rail + Air, Rail + Coach, Rail + Ferry—is in the proposal. Back-on-track knows that in legislations such as [the French](#) or [German law](#), a railway undertaking causing a missed connection between a train and a plane due to the delay is recognised as not responsible for the missed connection if the Rail + Air connection is not part of a ticket. [The Austrian regulation is a bit different](#). Such an issue is also important for climate-conscious passengers, who may sometimes need to have connections between trains, coaches and ferries.

Our proposals

Having concrete proposals on the matter goes beyond the scope of interest of Back-on-Track, and it would probably require significant work to design a legal framework to make true multimodal booking practical.

Bundling tickets is not integrated pricing

The issue

The future possibility for passengers to book single tickets should not be seen as equivalent to the possibility of passengers to book *through tickets*. The first major difference is that single tickets will still be **bundles of tickets with different cancellation conditions**, meaning that travellers will still be faced with complex packages of tickets where they may be able to cancel some legs, but not some others. In particular, Sparpreis tickets of the DB are only refundable as vouchers, which may make them difficult to use on other platforms than the one of the DB.

Furthermore, the price of journeys with different legs will remain the sum of the prices of the legs when the legs are operated by different railway undertakings. This is different to *integrated pricing*, where railway undertakings compute a fare based on the distance or even on the highest cost of a journey, regardless of connections. At least on a national territory, state railways like the DB or the SNCF have decided to have decreasing prices per kilometer for longer journeys - even though the SNCF already tends to sum the prices of each leg. For example, a Vienna to Stuttgart on the website of the DB can cost as much as a Vienna to Karlsruhe in day trains, despite Karlsruhe being further away from Vienna than Stuttgart and requiring a connection. Meanwhile, using a night train from Vienna to Stuttgart and then a train from Stuttgart to Karlsruhe will always lead to paying the leg from Stuttgart to Karlsruhe.

Our proposals

Defining an integrated ticketing scheme for the whole Europe is quite a challenge, and requires technical and legal work which needs to be done beyond this regulation. Back-on-Track hopes that this regulation, which, in some sense, bypasses [the CER Ticketing Roadmap](#), will not lead to abandoning the ambition to have a true European integrated ticketing system, but will on the contrary stimulate the effort to reach it. Back-on-Track insists on the necessity to

have a ticketing scheme which goes beyond dominant railway and also encompasses private operators, and thinks that this regulation will already provide a much needed extension of passenger rights and some ease in the booking.

The problem of discount cards

The issue

Similarly to the problem of integrated pricing, **this regulation does not tackle the question of railway discount cards**, which are critical to get interesting prices for passengers. The high dependency of ticket prices on discount cards, which are numerous, almost each operator having its own, makes it difficult and expensive for passengers to have all the relevant discount cards for a given journey, even if they do it regularly. **Furthermore, European residents may have very different prices for the same journey depending on where they live.**

For example, for a trip between Paris and Vienna, a person living in Austria would have far fewer difficulty to travel in Europe in general using an Interrail pass, valid outside of Austria, due to the ease of reaching the border, especially if they have a Vorteils card. Before the suspension of the night train between Paris and Vienna, an Austrian resident holding a Vorteils card would get significant discounts on the Nightjet. A German resident going from Vienna to Paris could use its Bahncard, for both ends of the journeys, but would not have a discount for Standard tickets inside Austria. Finally, a French resident having only a Carte Avantage Adulte could not use it beyond the first leg of the journey after they reach Germany.

Our proposals

Here again, the problem would require legal and technical work which would go far beyond this regulation. **Back-on-Track hopes that the European Commission is aware of this problem and intends to tackle it.**

An impact of prices which remain to be seen

The issue

While this proposal aims at lowering train tickets prices by creating a fair competition on operators, by not tackling the two issues cited above on integrated train ticketing and discount cards, this regulation may have a limited impact on prices. **One of the problems railway undertakings encounter is that they suffer from the unfair competition of polluting transportation modes such as airplanes.** While this regulation will make booking easier, it does not solve the problem that flights still enjoy fiscal advantages and do not need to bear the costs of their pollution, while trains often have to pay taxes on energy. This regulation does not propose mechanisms which would have a direct impact on the train ticket prices in order to make them more attractive, even relative to polluting means of transportation.

Our proposals

Back-on-Track continues to ask for concrete measures in favor of night trains such as decreased track access costs and, if necessary, public subsidies, as well as **measures to ensure that polluting modes of transport are no longer given preference.**

An over-reliance on digital means

The issue

This proposal gives a framework which relies **exclusively on the use of digital tools such as online booking platforms.** Passengers should still be allowed to book train tickets at a booth without losing passenger rights.

Our proposals

This issue is both related to the problem of asking for a single transaction to ensure passenger rights and to the problem of integrated ticketing. Dropping the requirement for a single transaction would allow passengers to at least buy their tickets one by one. If state railways are designated as responsible for distributing all train tickets, **their ticket booths** would be a place for passengers to buy their tickets around Europe.

Having to bundle train tickets is still a less comfortable journey than direct trains

The issue

Back-on-Track notes that the problem of getting train tickets to travel across Europe is very much linked to the progressive disappearance of long distance trains across Europe, especially night trains, which has made it impossible to cross long distances without having connections.

Our proposals

Back-on-Track hopes that the European Commission will continue to see the importance of night trains for long distance journeys across Europe and [will consider our proposals in our position paper](#).