

IATA Submission for the consultation on EU rules on multimodal digital mobility services and single digital booking & ticketing

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IATA supports the objective of facilitating multimodal passenger travel and improving transparency for consumers. The proposal contains a number of important principles that can contribute to these objectives while supporting competitive and innovative transport distribution markets.

As the legislative process progresses, it will be important to ensure that measures aimed at improving multimodal discoverability – meaning the ability for travelers to find travel itineraries that combine travel modes such as rail, bus and air – remain proportionate and do not inadvertently alter commercial distribution dynamics. In particular, the final Regulation should preserve the role of commercial agreements in governing cooperation between transport operators and intermediaries, safeguard operators' ability to determine how they distribute and retail their products and ensure that implementation and enforcement remain technology-neutral and limited to the rights and obligations established by the Regulation.

1. GENERAL OBSERVATIONS

The proposal addresses several challenges affecting the development of multimodal digital mobility services and recognizes the growing importance of digital channels in passenger travel. Airlines share the objective of making transport options easier to discover and compare across modes while ensuring that regulation remains proportionate and future-proof.

Importantly, the proposal avoids imposing direct obligations that would fundamentally alter existing commercial distribution relationships. This market-based approach provides an appropriate foundation for the continued development of multimodal travel solutions.

IATA welcomes the proposal's focus on transparency, fair commercial conduct and improved discoverability of multimodal travel options rather than on mandatory distribution obligations. This distinction is important. Consumers benefit from being able to identify, compare and combine transport options across modes, but facilitating discoverability does not require regulators to intervene in the commercial arrangements through which transport products are distributed and retailed.

The proposal's emphasis on commercial agreements, technology neutrality and proportionate enforcement provides a sound basis for the development of multimodal mobility services. Preserving these principles throughout the legislative process will help ensure that multimodal travel develops through market-driven innovation and voluntary commercial cooperation, while continuing to deliver greater choice and transparency for passengers.

2. BALANCED TREATMENT OF DISTRIBUTION MARKETS

The evolution of digital mobility services has increased the importance of certain intermediaries and distribution platforms within the transport ecosystem. Some B2B and B2C intermediaries occupy increasingly significant positions between transport operators and consumers. The proposal appropriately recognizes the need to ensure that contractual relationships remain balanced, and that commercial arrangements do not unnecessarily restrict market access or transport operator commercial freedom.

Maintaining balanced commercial relationships is important not only for transport operators but also for consumers. Competitive distribution markets encourage innovation, service quality improvements, and investment in new retailing capabilities. Ensuring the prohibition of abusive parity clauses imposed by intermediaries to transport operators should remain a priority of the proposal and throughout the entire legislative process.

The current proposal appropriately addresses this approach. In particular, Article 5(2)(b)(iii) seeks to preserve transport operators' freedom to continue distributing their products through alternative channels and commercial arrangements, including their own direct connect solutions, internet booking platforms and call centers. IATA strongly supports this objective.

However, the terminology used in the provision should better reflect the distribution nature of these activities. The examples cited are not all reservation systems in a technical sense; rather, they are different means through which transport operators distribute and retail their products to customers.

As an underlying policy objective is to protect transport operators' commercial freedom in distribution, references to "distribution channels", "distribution arrangements" or "distribution systems" would be more appropriate and consistent than a sole reference to "reservation systems". This is essential to future-proof the legislation.

Such terminology would also be more consistent with the broader approach of the proposal, which is centered on the functioning of the ticket distribution market (Explanatory Memorandum, Sections 1 and 2), defines B2C and B2B MDMS by reference to the distribution of transport products (Article 3(2) and 3(3)), and expressly refers to distribution facilities in the B2B context (Article 3(18) and Article 5(3)).

3. COMMERCIAL AGREEMENTS AS THE BASIS FOR COOPERATION

The proposal appropriately relies on commercial agreements as the primary basis for cooperation between transport operators and intermediaries. Preserving this principle is important to ensure that participation in distribution arrangements continues to be driven by business needs, customer value, and innovation.

To facilitate multimodal journey discovery, comparison, and planning, consumers should have access to the information necessary to identify and assess available travel options, including schedules and relevant product information. IATA supports the objective of improving transparency and discoverability of multimodal journeys, thereby ensuring that consumers can build itineraries that combine different transport modes.

At the same time, this objective should not be extended to require mandatory sharing of broader commercial distribution capabilities, retailing functionalities or commercially sensitive information that form part of

transport operators' proprietary distribution strategies. Such capabilities should remain subject to voluntary commercial agreements between transport operators and intermediaries.

Maintaining this distinction is important to preserve commercial freedom and incentives to invest in modern retailing solutions, differentiated product offerings and innovative distribution models. A balanced framework should promote transparency and multimodal mobility while avoiding measures that could effectively mandate access to commercial distribution assets beyond what is necessary to achieve the Regulation's objectives.

4. TECHNOLOGY NEUTRALITY AND INDUSTRY STANDARDS

The proposal adopts a generally technology-neutral approach and does not prescribe specific technical architectures. This principle should be maintained throughout the legislative process.

This is particularly relevant in aviation, where retailing and distribution technologies continue to evolve rapidly. The airline industry has developed the Retailing Business Reference Architecture and related standards designed to support modern, interoperable and consumer-focused distribution. Future implementation measures should therefore focus on interoperability outcomes rather than prescribing specific technical interfaces, data exchange protocols or system architecture.

Where equivalent outcomes can be achieved through existing industry standards and technical solutions, transport operators and intermediaries should remain free to determine the means through which information is exchanged and distributed. Recognition of existing standards and the principle of functional equivalence would reduce implementation costs, avoid unnecessary duplication and preserve incentives for continued innovation across the multimodal mobility ecosystem.

5. DISPUTE RESOLUTION AND PROPORTIONATE ENFORCEMENT

The effectiveness of the proposed framework will depend not only on its substantive provisions but also on how those provisions are implemented and enforced over time. In this regard, dispute resolution and enforcement mechanisms should remain closely aligned with the rights and obligations established by the Regulation.

The proposal is designed to address unfair conduct, discriminatory practices and contractual imbalances in relationships between transport operators and intermediaries. IATA supports the availability of effective enforcement mechanisms to ensure these provisions are applied consistently and predictably.

At the same time, enforcement processes should not be used to create de facto rights or obligations that are not expressly provided for in the Regulation. In particular, dispute resolution mechanisms should not become a means of obtaining mandatory access to content, distribution capabilities, retailing functionalities or commercially sensitive information where no such obligation exists under the regulatory framework. Such outcomes would go beyond the Regulation's objectives and could undermine the principle that commercial distribution relationships should remain primarily governed by voluntary agreements between the parties.

Accordingly, enforcement should focus on compliance with the behavioral obligations established by the Regulation, such as prohibitions on unfair contractual conditions, discriminatory treatment or restrictive exclusivity provisions, rather than on compelling access to commercial distribution assets or functionalities that the Regulation does not otherwise require to be shared. Such an approach aligns with the enforcement principles underpinning the EC's Digital Markets Act (DMA). In practical terms, dispute resolution bodies should be empowered to address unfair clauses, discriminatory practices or restrictions on the use of alternative distribution channels. However, they should not be empowered to require transport operators to provide access to content, APIs, inventory, NDC connections, retailing functionalities or commercially sensitive data where no such obligation is expressly established by the Regulation.

To provide legal certainty, IATA recommends clarifying in Articles 13 and/or 14 that national enforcement bodies and dispute resolution mechanisms are limited to enforcing the rights and obligations expressly established by the Regulation and may not impose additional content-sharing, data-sharing or distribution access obligations beyond those provided for in the Regulation.

A proportionate approach should focus on remedying clearly identified instances of unfair conduct while preserving the freedom of market participants to negotiate commercial arrangements and develop innovative distribution models. This will help ensure legal certainty, support investment and innovation, and maintain the balanced approach reflected in the proposal.

CONCLUSION

IATA recognizes the effort invested by the European Commission in developing a framework that seeks to promote multimodal travel while taking account of the realities of digital distribution markets. The proposal generally reflects a balanced approach that supports transparency, innovation and fair commercial relationships.

As negotiations advance, maintaining this balance will be essential. In particular, the final Regulation should continue to support voluntary commercial cooperation, technological neutrality and competitive distribution markets, thereby enabling multimodal mobility objectives to be achieved without creating unintended distortions or reducing incentives for continued innovation.