

Report by the Federal Railway Authority

on the Activities to enforce the Rights of Passengers in Bus and Coach Transport in accordance with Article 29 of Regulation (EU) No 181/2011



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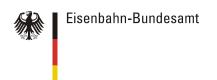
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Table of contents

1. Intro	oduction	4
2. Fun	actions and activities of the national enforcement body as an appeal body	6
2.1	General	6
2.2	Data relating to the handling of complaints in 2021	7
2.3	Data relating to the handling of complaints in 2022	10
2.4	Handling of complaints – outlook	12
3. Enf	orcement of passenger rights by supervisory measures	13
3.1	General	13
3.2	Data on the proactive enforcement of passenger rights in 2021	13
3.	2.1 Carriers	14
3.	2.2 Terminal managing bodies	15
3.3	Data on the proactive enforcement of passenger rights in 2022	16
3.	3.1 Carriers	16
3.	3.2 Terminal managing bodies	17
4. Oth	er activities of the national enforcement body	21
4.1	Public relations work by the national enforcement body	21
4.2	Cooperation between the national enforcement bodies	21
5. Cor	nclusion	22



1. Introduction

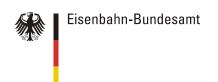
Regulation (EU) No 181/2011 of the European Parliament and of the Council of 16 February 2011 concerning the rights of passengers in bus and coach transport and amending Regulation (EC) No 2006/2004¹ has been in force since 1 March 2013. Article 29 of Regulation (EU) No 181/2011 states that the national enforcement bodies shall publish a report on their activity in the previous two calendar years every two years after 1 June 2015.

Section 3(1) of the EU Bus and Coach Passenger Rights Act (EU-FahrgRBusG) has designated the Federal Railway Authority (EBA) as the national enforcement body. This entity performs the tasks for the enforcement of Regulation (EU) No 181/2011, making use of the synergy effects from the lessons learned as the national enforcement body for railway and maritime and inland waterway transport. Moreover, the EBA is the body that hears appeals by passengers who have not been able to resolve their passenger rights concerns with the carrier (second sentence of section 3(2) of the EU-FahrgRBusG and Article 28(3)(2) of Regulation (EU) No 181/2011).

Germany, as a Member State, had, pursuant to section 1(2) of the EU-FahrgRBusG, availed itself of the exemption provided for in Article 2(5) of Regulation (EU) No 181/2011, exempting particular regular services from the scope of application of this Regulation if a significant part of such services, including at least one scheduled stop, is operated outside the Union. This exemption expired on 28 February 2017. Germany did not avail itself of the option to renew this exemption.

Passengers may submit their complaints not only to the national enforcement body at the EBA but, in accordance with section 6 of the EU-FahrgRSchG, also contact dispute resolution bodies recognized under the Consumer Dispute Resolution Act, provided that the carrier concerned is a member thereof. Currently, these are the Schlichtungsstelle für den öffentlichen Personenverkehr e.V. (söp), the Nahverkehr-Schlichtungsstelle e.V. (SNUB) and the Schlichtungsstelle Nahverkehr e. V. (snv). If the carrier concerned is not a member of a dispute resolution body, passengers can also address their complaint to the Federal Government's General Conciliation Body (Universalschlichtungsstelle) or to the out-of-court dispute

¹ Hereinafter referred to as: Regulation (EU) No 181/2011.

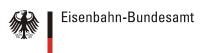


resolution body for consumers and entrepreneurs (Außergerichtliche Streitbeilegungsstelle für Verbraucher und Unternehmer e.V.).

Despite the continuing Covid-19 pandemic, it was possible to resume regular long-distance coach services in the second quarter of 2021. However, passengers were still reluctant to travel in 2021. On-site inspections by the national enforcement body's passenger rights oversight unit were also performed only to a limited extent in 2021 due to the Covid-19 pandemic.

In 2022, the number of journeys in regular long-distance bus and coach transport increased significantly as the pandemic situation improved. Accordingly, on-site inspections by the passenger rights oversight unit could be intensified, too.

On 26 March 2022, the EU Bus and Coach Passenger Rights Fees Ordinance (EU-FahrgRBusBGebV) entered into force. Since then, fees have had to be levied for the conduct of administrative proceedings during which an infringement of passenger rights provisions was determined. In the bus and coach sector, the fees are set as a fixed amount (and not according to the time spent). These fees are an additional means for motivating carriers to respect passenger rights.



2. Functions and activities of the national enforcement body as an appeal body

2.1 General

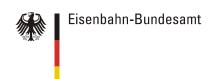
Since 1 March 2013, Regulation (EU) No 181/2011 concerning the rights of passengers in bus and coach transport has been in force. With effect from 27 July 2013, the EBA was designated the national enforcement body. As part of this function, the EBA has, among other things, to look into complaints submitted by passengers.

Section 3(2) of the EU-FahrgRBusG states that passengers have first of all to contact the carrier before consulting the national enforcement body as the appeal body. Subsequently, passengers may submit a complaint regarding the decision taken by the carrier to the national enforcement body for review if they are of the opinion that the carrier did not observe their passenger rights guaranteed by law.

Since the entry into force of Regulation (EU) 181/2011 in 2013, the number of complaints submitted to the national enforcement body for the rights of passengers has steadily increased until 2018. In 2019, a light decrease in the number of submissions was recorded for the first time. This trend increased during the Covid-19 pandemic. Even though the number of submissions has slightly increased again since 2021, the number of passenger rights complaints in 2021 and 2022 reached a level of around 40% of the 2019 figures.

To ensure that it is possible to compare the number of complaints between the individual transport modes, the Federal Ministry for Digital and Transport (BMDV), which is competent in this respect, defined the term 'complaint' in July 2016 as follows. Accordingly, 'complaint', as defined by the relevant EU Passenger Rights Regulation, means only written submissions reporting an infringement of the relevant Regulation and for which the EBA as the national enforcement body takes a decision of substance.

This means that submissions referred by the EBA to other supervisory authorities, national enforcement bodies or dispute resolution bodies are not recorded as passenger rights complaints. This also applies to submissions that are related to passenger rights but obviously do not constitute an infringement of the Passenger Rights Regulation, as well as submissions on service deficiencies, rude drivers or civil law claims by travellers, for example for loss of



luggage. This also includes passenger rights submissions for which a different enforcement body is responsible and that are thus not reviewed in any more detail by the German enforcement body, despite the fact that the German enforcement body often further accompanies the communication between the passenger and the competent national enforcement body in these cases.

These submissions that do not fall under the narrow definition of a complaint are handled and recorded statistically as general enquiries.

Other enquiries where passengers are initially referred to the carrier are recorded as 'misdirected enquiries'.

For all other submissions and general enquiries, the complainants will receive a reply either explaining the function of the EBA as an appeal body and the classification of their submission under passenger rights law and/or referring them, if appropriate, to the carrier or a dispute resolution body. In the case of complaints covered by the narrow definition of the term, complainants will receive an explanation of the outcome of the administrative procedure conducted with the carrier and of the settlement of any claims.

2.2 Data relating to the handling of complaints in 2021

In 2021, a total of 498 written and 172 oral submissions in connection with the rights of passengers travelling by bus and coach were received by the national enforcement body. The oral enquiries are not described in any more detail below.

In 337 written submissions, the complainants were referred directly to the carrier ('misdirected enquiries'). In the vast majority of these cases, the passengers assumed that they would reach the bus or coach operator with their enquiry. These were either submissions that were not related to passenger rights, such as requests for the rebooking of journeys or requests for which the carrier is the first point of contact for submitting a complaint in accordance with Article 28(3)(2) of Regulation (EU) No 181/2011 in conjunction with the first sentence of section 3(2) of the EU-FahrgRBusG.

A further 111 written submissions related to general enquiries. 21 of these submissions dealt with delays or cancellations in general, 12 submissions concerned the carriers' obligations to

provide information before and during the journey and 12 enquiries were related to reimbursement of the ticket price. The subjects of other written submissions were the handling of complaints (2), the provision of assistance in case of cancellation or delayed departure (1) and the rights of persons with reduced mobility (1). 62 cases did not involve any direct passenger rights issues but related to questions of service and other aspects associated with bus and coach travel.

For reasons of competence, 6 of these general enquiries were transferred to other European national enforcement bodies. In 4 cases, passengers were informed that another national enforcement body was responsible for their submission. 12 passengers were referred to the dispute resolution bodies with their requests.

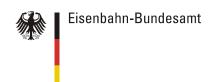
50 other submissions complied with the narrow cross-modal definition of the term 'complaint'. 36 complaints referred to Article 19 of Regulation (EU) No 181/2011, which states, among other things, that the carrier, in the case of cancellation, overbooking or delayed departure from a terminal of more than 120 minutes, has to offer the passenger the choice of continuation of the journey at no additional cost and under comparable conditions or of reimbursement of the ticket price. Instead of this, passengers were frequently rebooked on another service or merely informed about the significant delay without being offered a continuation of their journey by a different route or reimbursement. Such complaints are often associated with poor information or the absence of information about the situation and the estimated time of departure (Article 20 of Regulation (EU) No 181/2011) and inadequate travel information during the journey or the failure to provide such information (Article 24 of Regulation (EU) No 181/2011).

Type and contents of the complaints in 2021 ²					
Regulation (EU) No 181/2011	Contents	Number of complaints	Infringements	Remarks	
Article 19(1)	Choice offered between re-routing/ reimbursement	12		No or only insufficient choice offered	
Article 19(1)(a)	Continuation of journey at no additional cost	8		Failure to reimburse the price of the alternative service	
Article 19(1)(b)	Reimbursement of the ticket price	10		No reimbursement or reimbursement by voucher rather than money or reimbursement under fare schemes instead of under passenger rights law	
Article 19(2) to (5)	Obligations in the case of a cancelled or delayed service or overbooking	6	22 ³	Delay in departure/cancellation, compensation, deadline for reimbursement, inoperability of the vehicle	
Article 20(1) and (4)	Information in the event of a delay in departure/ cancellation	8		No, incorrect or delayed information	
Article 21	Assistance in case of cancelled or delayed departures	2		No meals or refreshments / no accommodation	
Article 24	Provision of adequate information to passengers throughout their travel	1		Lack of information during the journey	
Article 27(2)	Submission of complaints	3		No reply within the specified period	

In all cases, the EBA sought a statement from the carriers to clarify the situation. After reviewing the comments provided by the carriers, 22 infringements were identified, most of which had already been settled in the course of administrative procedures. Further penalties going beyond the administrative procedures were not necessary in these cases.

² Evaluated on 20 February 2023.

³ Related to all complaints complying with the narrow definition of the term 'complaint'.



A notice was issued against one carrier who in some cases did not comply with the requirement under Article 19(5) of Regulation (EU) No 181/2011 to reimburse ticket prices within one month.

2.3 Data relating to the handling of complaints in 2022

In 2022, a total of 634 written and 256 oral submissions in connection with the rights of passengers travelling by bus and coach were received by the national enforcement body. Oral enquiries are not described in any more detail below.

In 454 cases, the passengers had directly contacted the national enforcement body ('misdirected enquiries'). These were often submissions in which the carrier had not yet been involved. The passengers had assumed that they would reach the carrier with their submission and were then referred to the carrier concerned.

A further 134 written submissions related to general enquiries. 26 of these submissions were related to the entitlement to reimbursement deriving from Article 19 of Regulation (EU) No 181/2011. 18 enquires concerned delays or cancellations in general. 24 submissions concerned the carriers' obligations to provide information before and during the journey. 1 submission was related to the handling of complaints, and 5 to the provision of assistance in case of cancellation or delayed departure. 1 submission dealt with the issue of security, 1 with tickets. 1 submission referred to the rights of persons with reduced mobility and disabled persons. 57 submissions involved issues that were not directly related to passenger rights but addressed questions of service and other aspects associated with bus and coach travel.

In 24 of these general enquiries, passengers were informed that another European national enforcement body was responsible for their submission. 11 passengers were referred to the dispute resolution bodies. In this context, it should be noted that even in those cases where the complainant is directly referred to the carrier, the passenger is, if necessary, informed about the dispute resolution body if the facts of the case, in our opinion, are eligible for dispute settlement. These cases are not explained in detail here in terms of numbers, as they are recorded as 'misdirected enquiries'.

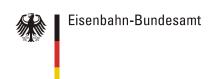
46 other submissions comply with the narrow definition of the term 'complaint'.

Type and contents of the complaints in 2022 ⁴					
Regulation (EU) No 181/2011	Contents	Number of complaints	Infringements	Remarks	
Article 9(1)	Right to transport	2		Refusal of permission to board	
Article 16(1)(b)	Training	2		Driver not trained	
Article 19(1)	Choice offered between re- routing/ reimbursement	12		No or only insufficient choice offered	
Article 19 (1)(a)	Continuation of journey at no additional cost	15		Failure to reimburse the price of the alternative service	
Article 19 (1)(b)	Reimbursement of the ticket price	3		No reimbursement or reimbursement by voucher rather than money or reimbursement under fare schemes instead of under passenger rights law	
Article 19(2) to (5)	Obligations in the case of a cancelled or delayed service or overbooking	6	205	Delay in departure/cancellation, compensation, deadline for reimbursement, inoperability of the vehicle	
Article 20(1) and (4)	Information in the event of a delay in departure/ cancellation	2		No, incorrect or delayed information	
Article 21	Assistance in case of cancelled or delayed departures	4		No accommodation	

The complaints made in 2022, too, referred in the majority of cases to Article 19 of Regulation (EU) No 181/2011, often in connection with poor information or the absence of information about the situation and the expected time of departure (Article 20 of Regulation (EU) No

⁴ Evaluated on 24 May 2023.

⁵ Related to all complaints complying with the narrow definition of the term 'complaint'.



181/2011). Moreover, complaints were made because of the lack of offers for overnight accommodations or the reimbursement of related costs (Article 21(b) of Regulation (EU) No 181/2011) and problems related to the treatment of persons with reduced mobility (Article 9(1) and Article 16 of Regulation (EU) No 181/2011).

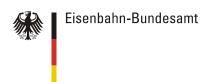
After clarification of the facts, it was possible to identify 20 infringements which had already been settled in the course of the administrative procedures. Further penalties going beyond the administrative procedures were not necessary. On the date on which the data were collected (24 May 2023), 3 administrative procedures had not yet been completed, which means that the actual number of infringements might still increase.

The Covid-19 pandemic did not play a major role in the 2022 submissions. In some cases, passengers complained about the non-observance of the requirement to wear face masks. In these cases, the complainants were informed of the responsibility of the carrier.

2.4 Handling of complaints – outlook

As in previous years, it is apparent that the complainants had to be initially referred to the carrier in the case of most submissions (around 70%). The EBA only took action as an appeal body on around one third of the submissions.

Now that the Covid-19 pandemic has largely been overcome, it remains to be seen how the number of submissions will develop.



3. Enforcement of passenger rights by supervisory measures

3.1 General

During the period under review (2021/2022), as in previous periods, the EBA, as the national enforcement body within the meaning of Article 28(1) of Regulation (EU) No 181/2011 and section 4 of the EU-FahrgRBusG, proactively took measures to ensure compliance with Regulation (EU) No 181/2011. The focus was on checking whether the operators of regular long-distance coach services comply with passenger rights following the restrictions imposed by the Covid-19 pandemic, as well as checking compliance with the obligation to provide information and assistance at bus terminals.

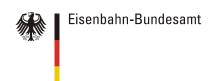
Given that, in the past, the way in which tour operators and travel agents have treated passengers was, in the majority of cases, in compliance with passenger rights legislation, supervisory measures are only carried out for these obligated parties if a relevant incident occurs. Therefore, in reporting years 2021 and 2022, no checks were carried out.

If infringements were identified, the obligated parties were admonished, within the framework of administrative procedures, to comply with the law. Further penalties going beyond the administrative procedures were not necessary in the period under review.

3.2 Data on the proactive enforcement of passenger rights in 2021

Also in 2021, the measures taken to contain the Covid-19 pandemic had a major impact on passenger transport. National and international travel restrictions nearly brought travel to a complete standstill. Following the outbreak of the pandemic, operations were suspended for the second time for months until well into 2021. The market leader was the first carrier to resume operations at the end of March. Further carriers followed in the summer months, all of them initially with a reduced number of services.

In the first six months of the year as well as at the end of the year, the staff of the national enforcement body increasingly focused their activities on reactive supervision. The challenge was to restore the conditions for a progressive return to normal operations. For this purpose,



a task force of the EBA developed a strategy for service operations under pandemic conditions to fulfil its statutory duties while taking into account the health of staff.

It was only possible to actively supervise passenger rights based on the developments of the pandemic in the months of July to November of the reporting year. The focus was on company and structural checks of the carriers as well as regular checks of the terminal infrastructure.

In 2021, 4 checks involving carriers and 13 checks involving infrastructure managers were carried out.

3.2.1 Carriers

Against the background of the renewed suspension of operations in regular long-distance coach services, supervisory activities in the reporting year of 2021 again were focused on compliance with passenger rights following cancellations of journeys by the carriers. A very large number of passengers were unable to travel by coach and made requests for reimbursement of the ticket price.

The fourth sentence of Article 19(5) of Regulation (EU) No 181/2011 states that payments already made have to be reimbursed in money in general. Vouchers may not be issued unless the passenger voluntarily accepts them.

Already in 2020, a long-distance coach operator did not comply with this requirement. Passengers were offered reimbursement in money or by means of a voucher; however, finally, all passengers received a voucher – despite their explicit request for reimbursement in money. The carrier was consulted in preparations for the issuance of a notice. From this point on, the carrier behaved in accordance with passenger rights. No further infringements of Article 19(5) of Regulation (EU) No 181/2011 were identified during further supervisory measures in 2021.

Type and contents of the supervisory measures involving carriers in 2021 ⁶				
Inspections of carriers				
Regulation (EU) No 181/2011	Contents	Number of inspections	Infringements	
Fourth sentence of Article 19(5)	Reimbursement of the ticket price if the passenger is entitled on the basis of Article 19(1)(b)		0	
Article 20(1) and (4)	Information in the event of cancellation	4	0	
Article 25	Information on passenger rights		2	

3.2.2 Terminal managing bodies

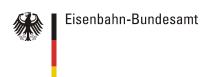
The inspections of the terminal managing bodies focused on compliance with the obligation set out in Article 20(1) of Regulation (EU) No 181/2011 to provide information in the case of deviations from the timetable. At the same time, inspections were carried out at the terminals to check whether passengers were being informed about their rights and provided with the contact details of the national enforcement body, as required by Article 25 of Regulation (EU) No 181/2011.

Inspections of bus terminal managing bodies in 2021 – focal points ⁷				
Regulation (EU) No				
181/2011	Contents	Number of inspections	Infringements	
Article 20(1)	Information in the event of delay in departure or cancellation	13 ⁸	0	
Article 25	Information on passenger rights			

⁶ Evaluated on 31 March 2023.

⁷ Evaluated on 31 March 2023.

⁸ The number of inspections also includes inspections of long-distance bus terminals with regard to their classification as terminals or stops in accordance with Regulation (EU) No 181/2011.



3.3 Data on the proactive enforcement of passenger rights in 2022

After two years marked by the Covid-19 pandemic, passenger numbers had not yet returned to pre-Covid levels in the 2022 reporting year. The overall trend led to significant capacity reductions by the transport operators and also to the complete termination of some scheduled services. At the same time, the share of cross-border transport operations carried out by transport companies from Central and Eastern Europe increased significantly.

As of 1 April 2022, the national enforcement body resumed its regular operations. The supervisory measures focused on checks of the bus stop infrastructure.

20 inspections involving carriers and 59 inspections involving terminal managing bodies were performed.

3.3.1 Carriers

Also in 2022, numerous lines of all carriers were affected by cancellations. Again, an essential part of the supervision of passenger rights at carrier level dealt with checking whether passengers were treated in compliance with the Passenger Rights Regulation. For all carriers inspected, the handling of complaints following cancellations by the carrier was in line with passenger rights.

Another field of action was accessibility in the use of regular long-distance coach services by disabled persons and persons with reduced mobility. For the transport of this group of persons, staff employed in this field, including drivers, have to be trained and instructed accordingly. To examine whether this training is provided in accordance with Article 16(1)(b) of Regulation (EU) No 181/2011, the training schemes of the carriers were requested. The final overall assessment has still to be made, as further supervisory measures will follow.

Type and contents of the supervisory measures involving carriers in 2022 ⁹				
Inspections of carriers				
Regulation (EU) No 181/2011	Contents	Number of inspections	Infringements	
Article 16(1)(b)	Disability-related training of drivers	3	0	
Fourth sentence of Article 19(5)	Reimbursement of the ticket price if the passenger is entitled on the basis of Article 19(1)(b)	4	0	
Article 20(1) and (4)	Information in the event of delay in departure or cancellation	9	0	
Article 19(1) and (4) in conjunction with (5)	Continuation of journey at no additional cost / Reimbursement of the ticket price	2	3	
Article 19(3)	Inoperability of the vehicle	1	0	
Article 21	Assistance in case of cancelled or delayed departures	1	1	

3.3.2 Terminal managing bodies

The inspections at the terminals within the meaning of Regulation (EU) No 181/2011¹⁰ focused on checking compliance with the obligation to provide information and assistance in situations relevant to passenger rights.

Compared to the situation before the Covid-19 pandemic, the previously good quality standards had deteriorated. The requirement under Article 20(1) of Regulation (EU) No 181/2011 to provide information to passengers at the passenger information systems in the event of delay or cancellation of coaches was not fully complied with at all terminals. Real-time data was not consistently communicated via the passenger information systems. Acoustic information in the form of loudspeaker announcements was only provided in isolated cases; active information by staff on site was only available at every second terminal inspected.

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⁹ Evaluated on 31 March 2023.

¹⁰ The following terminals within the meaning of Article 3(m) of Regulation (EU) No 181/2011 were inspected: Berlin, Leipzig, Hamburg, Hanover, Frankfurt/Main, Stuttgart, Mannheim, Munich

The basis for providing passenger information at terminals is that the traffic control centres receive relevant information from the operators of regular long-distance coach services. Against the background of the deficiencies identified, cooperation between the terminal managing bodies and the carriers operating on site was examined in more detail. The outcome was that only the market leader provided continuous and reliable real-time data in cases of delays and cancellations. All other long-distance coach operators were very restrained in the provision of information and communicated virtually no data to the traffic control centres at the individual terminals. This had a negative impact on the quality of passenger information.

Furthermore, accessibility to regular long-distance coach services by disabled persons and persons with reduced mobility was checked throughout Germany. A particular focus was on the terminals *designated* by the Member States in accordance with Article 12 of Regulation (EU) No 181/2011. At these terminals, assistance is to be provided free of charge for the above-mentioned group of persons. This requires a contact point where the arrival can be reported and help requested. Moreover, basic information on the type and scope of assistance available is to be provided. In addition, a description of accessibility is to be communicated either by means of a notice at the terminal or online.

After talks with the terminal managing bodies, significant improvements could be achieved for passengers with regard to the implementation of Regulation (EU) No 181/2011.

Type and contents of the supervisory measures involving terminal managing					
bodies in 2022 ¹¹					
Regulation (EU) No					
181/2011	Contents	Number of inspections	Infringements		
Article 11	Physical/online publication of accessibility conditions		2		
Article 14(5)	Obligation to establish a point of contact for PRM	59 ¹²	2		
Article 20(1)	Information in the		1		
Article 25	Information on passenger rights		0		

3.4 Enforcement of the rights of passengers by supervisory measures – looking ahead

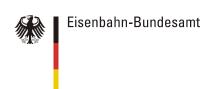
Checking whether passenger information is provided by operators of regular long-distance coach services before and during the journey continues to be an integral part of the supervisory activities. After the end of the Covid-19 pandemic, inspectors travelling anonymously on long-distance coaches are to be re-established as a regular process.

Another focus of the supervisory measures will be on the infrastructure managers' obligation to provide information in the case of deviations. The aim will be to restore the good provision of passenger information that existed until the outbreak of the Covid-19 pandemic. However, this is made more difficult by the fact that in many cases no effective processes for the exchange of information on regular services from neighbouring European countries have been established between the carriers and the traffic control centres at the local terminals. As these carriers are not based in Germany, they are difficult to reach for the enforcement body.

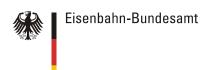
Both the supervisory measures described at the designated terminals and the request of training schemes from the operators of regular long-distance coach services serve to prepare future nationwide targeted enforcement activities to obtain a meaningful overall picture of the

¹¹ Evaluated on 31 March 2023.

¹² The number of inspections also includes inspections of long-distance bus terminals with regard to their classification as terminals or stops in accordance with Regulation (EU) No 181/2011.



accessibility of disabled persons and persons with reduced mobility to regular long-distance coach services.



4. Other activities of the national enforcement body

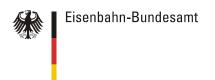
4.1 Public relations work by the national enforcement body

In addition to providing information on passenger rights on the EBA's website, the national enforcement body, in the period under review, also made use of flyers on passenger rights in rail, maritime and inland waterway and bus and coach transport in order to inform passengers about their rights under Regulation (EU) No 181/2011.

At the annual open day of the Federal Ministries in Berlin, the national enforcement body regularly offers a point of contact to provide members of the public with information on passenger rights. In the period under review, this event was again held from 20 to 21 August 2022 for the first time after a two-year break. In 2020 and 2021, the open day of the ministries was cancelled due to the Covid-19 pandemic.

4.2 Cooperation between the national enforcement bodies

Alongside the exchange of information between the national enforcement bodies in bus and coach transport under the auspices of the European Commission in Brussels, individual complaints are transferred to other national enforcement bodies if these cases are outside the remit of the EBA. On an ad hoc basis, the German national enforcement body avails itself of the opportunity for an exchange of views on overarching issues with the enforcement bodies of other EU Member States.



5. Conclusion

This reporting period has shown again that the national enforcement body for passenger rights at the EBA can provide many passengers with support regarding their concerns. Even in cases where the EBA cannot help directly due to a lack of competencies, passengers benefit from a comprehensive presentation of the legal situation or a reference to the right contact person as well as, in many cases, assistance in communication.

There are great synergy effects both in the handling of complaints as well as in the implementation of supervisory measures for bus and coach, rail and waterborne transport.

The focus of the supervisory measures is determined, on the one hand, by the priorities of the complaints handled and, on the other hand, proactively by the obligations resulting from the Passenger Rights Regulation. As the national enforcement body is again able to travel more and more throughout the country and check the actual conditions in the field of transport, these findings will be incorporated in the handling of complaints and serve the systematic enforcement of passenger rights.