

**COMMISSION STAFF WORKING PAPER July 14<sup>th</sup> 2005**  
**Rights of passengers in international bus and coach travel**  
**Consultation document DG TREN**  
**(Draft) Comments Vlaamse Vervoermaatschappij VVM De Lijn**

Introductory statement

As a public transport operator , serving 6 million Flemish citizens each day, VVM De Lijn vigorously supports all efforts to make public transport more accessible to persons with reduced mobility.

Within our organisation, a specific project group has been given the task of elaborating a plan (+ timetable) for guaranteeing increased accessibility for passengers with reduced mobility. (document only available in Dutch)

It should be emphasized that improving accessibility of public transport for handicapped people is a gradual process, requiring voluntary commitments of both PT operators and competent authorities.

As far as the questionnaire (in attachment of the above-mentioned consultation document ) is concerned, we can only conclude that the consultation addresses only INTERNATIONAL bus and coach travel, excluding thereby all forms of urban and regional public (non-international) transport.

As a public transport operator, we are unable to emit any judgment on the necessity and opportunity of EU-legislation in the field of international bus and coach travel.

As for the SCOPE OF THE REGULATION (question 3: “Should only international services be regulated and domestic services be left to each member state”) , we think that concepts like “international” and “domestic” are not entirely adequate to circumscribe the exact scope of any future EU-legislation in the field of passenger rights.

We think it is preferable to make a clear distinction between PUBLIC TRANSPORT (regional and urban passenger transport) , operating under a set of public service obligations as a service of general interest, on the one hand, and COMMERCIAL INTERNATIONAL COACH TRAVEL (example: Eurobus-connection between Brussels and Warsaw) which is run on a purely commercial basis without any public service obligations whatsoever, on the other hand.

This finetuning of definitions seems absolutely necessary in order to avoid a situation whereby regional and local public transport bus lines in border regions, often crossing the border occasionally and for very short distances , would be considered “international bus travel” thereby falling within the scope of any future EU-regulation.

As a public transport operator, we are in principle not opposed to a set of rules stipulating the rights of persons with reduced mobility in our sector. The opportunity of EU-initiatives could be questioned however, taking into account that a majority of PT-operators have already worked out voluntary commitments leading to improved accessibility.

It should be borne in mind that public transport, having a purely local/regional character and being operated on the basis of a set of public service obligations put down by a competent organising authority, can by no means be compared to a fully liberalised commercial sector such as the international bus and coach travel.

If future european legislation on passenger rights should ever be extended to encompass the public transport sector, it should fully take into account the limitations and needs of this specific transport mode

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