

AFGØRELSE FRA ANKENÆVNET FOR BUS, TOG OG METRO

Journalnummer:	25-0476
Klagerne:	XX på egne vegne og på vegne af YY
Indklagede:	Metroselskabet I/S v/Metro Service A/S
CVR-nummer:	21 26 38 34
Klagen vedrører:	To kontrolafgift på hver 750 kr. grundet rejse med Metroen uden billet
Parternes krav:	Klagerne ønsker, at ankenævnet annullerer kontrolafgifterne, og gør gældende, at de forud for påstigning oplevede problemer med at købe billetter på mobiltelefonen grundet manglende netværksforbindelse, og herefter ikke kunne finde andre måder at købe billet på Indklagede fastholder kontrolafgiften
Ankenævnets sammensætning:	Nævnensformand, dommer Lone Bach Nielsen Dorthe Thorup Nikola Kiørboe Helle Berg Johansen Dorte Lundqvist Bang

Ankenævnet for Bus, Tog og Metro har på sit møde den 17. juni 2026 truffet følgende

AFGØRELSE:

Metroselskabet I/S v/Metro Service A/S er berettiget til at opretholde kravet om klagernes betaling af to kontrolafgifter på hver 750 kr., i alt 1.500 kr.

Klageren skal betale beløbet til Metroselskabet I/S v/Metro Service A/S, der sender betalingsoplysninger til klagerne.

Da klagerne ikke har fået medhold i klagen, tilbagebetales klagegebyret ikke, jf. ankenævnets vedtægter § 24, stk. 2, modsætningsvist.

- oOo -

Hver af parterne kan anlægge sag ved domstolene om de forhold, som klagen har vedrørt.

Klagerne henvises til at søge yderligere oplysning om eventuel bistand i forbindelse med sagsanlæg fx på www.domstol.dk, www.advokatnoeglen.dk og /eller eget forsikringssselskab om eventuel forsikringsretshjælp.

SAGENS OMSTÆNDIGHEDER:

Klagerne, som er bosiddende i Moldova, blev den 23. oktober 2025 kl. henholdsvis 22:07 og 22:10 pålagt hver en kontrolafgift på 750 kr. i Metroen på strækningen Christianshavn st. – Københavns Lufthavn st., efter at Metroen havde forladt Amagerbro st., da de ved kontrol ikke kunne forevise gyldig rejsehjemmel.

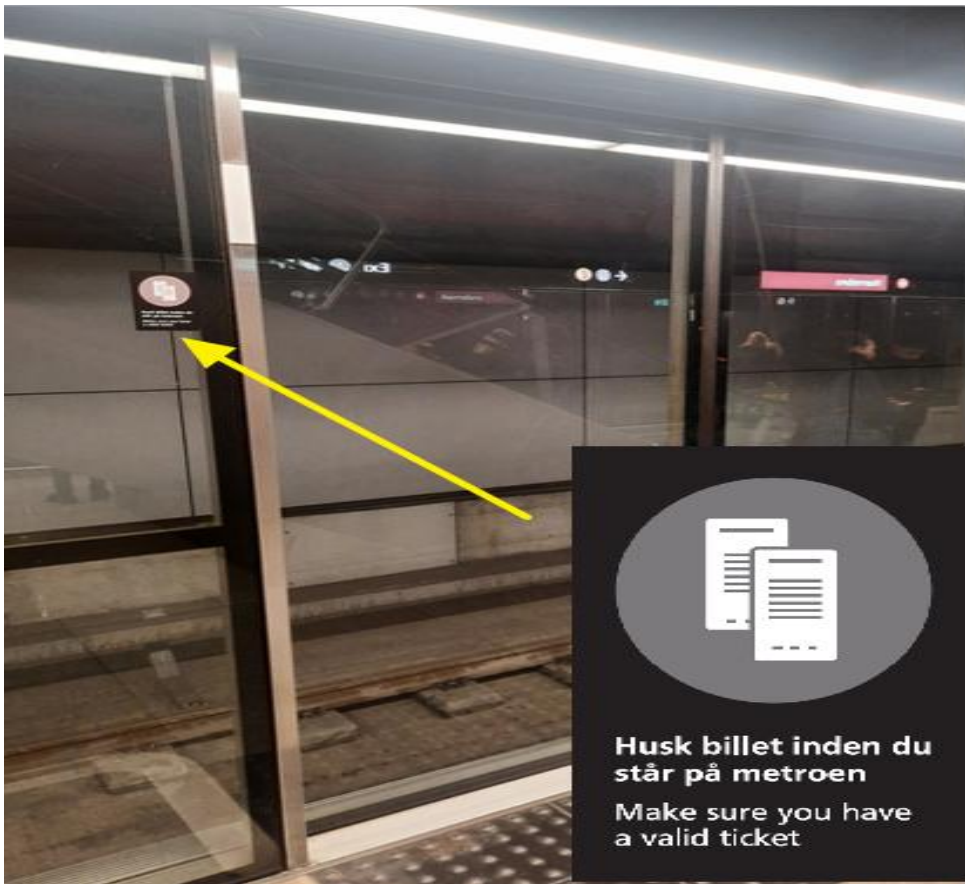
Klagerne har oplyst, at de under et kort ophold i Danmark forsøgte at købe billet online inden påstigning, men at dette ikke lykkedes som følge af tekniske problemer, muligvis relateret til ustabil netværksforbindelse på mobiltelefonen. De har anført, at de flere gange forsøgte at gennemføre købet, søgte efter billetautomater på stationen og spurgte andre passagerer om hjælp, men uden at finde en løsning. Herefter steg de på Metroen med henblik på at få hjælp af en steward og købe billet. De har endvidere anført, at de handlede i god tro, og at de generelt havde købt gyldige billetter under deres ophold.

Metro Service har oplyst, at klagerne ved kontrol ikke kunne fremvise nogen form for gyldig rejsehjemmel, og at der derfor blev udstedt kontrolafgifter i overensstemmelse med gældende rejseregler. Metro Service har henvist til, at Metroen drives efter et selvbetjeningsystem, hvor det er passagerens eget ansvar at sikre sig gyldig billet inden påstigning. Det er endvidere oplyst, at der på stationerne findes både billetautomater og gule opkaldspunkter med mulighed for at kontakte kontrolrummet for vejledning, og at billetautomater er synlige på stationen.

Klagerne har fastholdt, at de ikke havde reel mulighed for at købe billet inden påstigning, og at informationen på stationen var utilstrækkelig for udenlandske besøgende. Derfor har de indbragt sagen for ankenævnet.

Informationen på stationen fremgår som følger:

Skilte på perron-dørene med påmindelse om, at passagerer skal være i besiddelse af gyldig billet inden påstigning:



Billetautomat på stationen:



Informationstavle med mulighed for opkald til Metro Service-personale:



For at give den bedst mulige rejseoplevelse for alle kunder i Metroen, bedes du overholde følgende ordensregler.

To provide the best possible travel experience for all passengers, you are required to abide to the following regulations.



Du kan benytte de gule kontaktpunkter til generelle henvendelser til Metroens kontrolrum ved at trykke på den grønne knap, INFO. Ved akut fare skal du trykke på den røde knap, ALARM.

Inquiries to the Metro control room may be made from the yellow intercoms by pressing the green button, INFO. In case of emergency, press the red button, ALARM.



Metrostationer og metrotog er kameraovervåget af hensyn til de rejsendes sikkerhed og tryghed.

For passenger safety and security, Metro stations and trains are under video surveillance.



Rejser med Metroen kræver gyldigt kort eller billet inden påstigning. Der findes Rejsekort- og billetautomater på alle stationer. Billetkontrol kan ske både under rejsen, ved udstigning og på stationen efter endt rejse. Har du ikke gyldigt kort eller billet udstedes kontrolafgift efter gældende regler.

Travelling on the Metro requires a valid ticket. Tickets are available from ticket vending machines at the stations. Ticket control may be performed during the journey, when leaving the train and at the station after the journey has ended. Passengers boarding a train without a valid ticket will be liable to pay a fare evasion ticket.

ANKENÆVNETS BEGRUNDELSE FOR AFGØRELSEN:

Ankenævnet lægger til grund, at klagerne ved billetkontrollen ikke var i besiddelse af gyldig rejsehjemmel.

Det følger af de fælles landsdækkende rejseregler, at det er passagerens eget ansvar at sikre sig gyldig rejsehjemmel inden påstigning.

Ankenævnet finder, at det forhold, at klagerne ikke kunne gennemføre billetkøb på mobiltelefonen, ikke kan føre til et andet resultat. Ankenævnet lægger herved vægt på, at klagerne, efter at de erfarede, at det ikke lykkedes at købe billet via mobilen, ikke sikrede sig billet på anden vis inden påstigning.

Ankenævnet bemærker i den forbindelse, at der på metrostationer findes alternative muligheder for billetkøb, herunder billetautomater, ligesom der er mulighed for at søge assistance via opkaldspunkter.

Det kan endvidere ikke føre til et andet resultat, at klagerne oplyser at have handlet i god tro, eller at de tidligere havde købt gyldige billetter under deres ophold.

Herefter blev kontrolafgifterne til klagerne pålagt med rette, da det ikke er en betingelse for at pålægge en kontrolafgift, at passageren bevidst har søgt at omgå rejsereglerne, finder ankenævnet, at der ikke har foreligget sådanne særlige omstændigheder, at kontrolafgifterne skal frafaldes.

RETSGRUNDLAG:

Ifølge § 2, stk. 1, jf. § 3 nr. 3 i lovbekendtgørelse nr. 686 af 27. maj 2015 om lov om jernbaner, gælder loven også for metroen. Ifølge § 2 i lov nr. 206 af 5. marts 2019 om ændring af lov om trafikelskaber og jernbaneloven fremgår det, at jernbanelovens § 14, stk. 1, affattes således:

»Jernbanevirksomheder, der via kontrakt udfører offentlig servicetrafik, kan opkræve kontrolafgifter, ekspeditionsgebyrer og rejsekortfordringer.«

§ 14, stk. 2 og 4, ophæves, og stk. 3 bliver herefter stk. 2. Stk. 3 har følgende ordlyd:

”Passagerer, der ikke er i besiddelse af gyldig rejsehjemmel, har pligt til på forlangende at forevise legitimation for jernbanevirksomhedens personale med henblik på at fastslå passagerens identitet.”

I de Fælles landsdækkende rejseregler (forretningsbetingelser), som trafikvirksomhederne har vedtaget, præciseres hjemmelen til udstedelse af en kontrolafgift.

Det anføres således bl.a., at passagerer, der ikke på forlangende viser gyldig rejsehjemmel, herunder er korrekt checket ind på Rejsekort til deres rejse, skal betale en kontrolafgift på 750 kr. for voksne.

Det er passagerens ansvar, at rejsehjemlen er endeligt modtaget på den mobile enhed før påstigning. Som passager uden gyldig rejsehjemmel betragtes også passager, der benytter kort med

begrænset tidsgyldighed (f.eks. pensionistkort) uden for kortets gyldighedstid, eller hvis andre rejsebegrensninger ikke overholdes (f.eks. for hvornår cykler må medtages, eller om der er betalt metrotillæg). Passagerer, der rejser alene på andres Rejsekort Personligt eller med en anden kundetype, end passageren er berettiget til, rejser uden gyldig rejsehjemmel. Kortindehaveren skal altid selv være checket ind på kortet på de rejser, hvor et Rejsekort Personligt benyttes.

PARTERNES ARGUMENTER OVER FOR ANKENÆVNET:

Klageren anfører følgende:

“Dear Appeal Board,

First of all, I apologize for any possible translation errors because I am using Google Translate to write this message to you.

My name is XX, from the Republic of Moldova. I wish to contest the inspection fee no. 01460271, issued to me on October 23, 2025 in the Copenhagen Metro, a situation that I contest jointly with my colleague YY through whom she also received the inspection fee applied by case no.01460270-40.

Together with my colleague, YY, we were in Denmark between 20–24 October 2025 to participate in the CLRTAP intersessional meeting in Elsinore (Helsingør), organized under the UN Convention on Long-Range Transboundary Air Pollution. It was our first visit to Denmark, and we tried to comply with all transport rules and to purchase valid tickets throughout our stay — which we did successfully on all days except for the evening of October 23, when the problem occurred.

At that time, while traveling from the Airport/Copenhagen to our hotel (CPH Studio Hotel), we attempted several times to buy metro tickets online, but we encountered technical errors during the payment process — possibly due to an unstable internet connection (in Roaming). The station did not have any available staff or clear ticket purchase instructions in a language we could understand. We also asked some passengers for help, who told us that tickets could only be purchased online.

After repeated unsuccessful attempts, and considering the late hour, we decided to board the metro intending to ask the inspector for assistance and to purchase the tickets directly with his help, in good faith. When the ticket inspector arrived, we immediately explained the situation, presented our identification, and explicitly asked him to help us purchase tickets. However, instead of providing assistance or explaining that he was issuing a fine (“inspection fee”), the inspector simply handed us a paper and told us that we could “scan the QR code later and pay for the tickets.”

Only later, at the hotel, we learned that the document was not a ticket but a fine of 750 DKK each.

We consider this situation to be the result of a lack of opportunity to perform check-in or ticket purchase, technical errors in the online system, missing staff at the station, and unclear or insufficient information for foreign visitors. We acted transparently, communicated honestly with the inspector, and expressed our readiness to pay for the normal ticket price, not to evade payment.

Therefore, I respectfully request the Appeal Board to cancel or annul the inspection fee, taking into account:

- the technical impossibility to complete the online payment,
- the absence of station staff or functional guidance in English,
- the lack of explanation and incorrect guidance provided by the inspector, and
- the good faith demonstrated by our immediate communication and willingness to pay the regular fare.

The same request is for my colleague YY (case no. no.01460270-40), because we consider that the respective fee was not applied objectively and correctly to us taking into account the described case.

Even though we are now at home in the Republic of Moldova, I repeat that we are open to presenting, if necessary, all demonstrations regarding the payment of transport tickets during our stay in Denmark, and to make the payment for the unpaid ticket during our trip on October 23, 2025, to Denmark. At your

decision, you can send us an invoice with the cost of the tickets and we will pay the necessary amount by transfer.

We remain open to paying the standard ticket cost for that journey.

Thank you for your understanding and fair consideration of our case.

Kind regards,

Indklagede anfører følgende:

” Due to power of attorney regarding inspection fee number 01460270 this reply regards both inspection fee number 01460270 and 01460271.

Herewith follow our comments and appendices to the above complaint.

The metro, like the other means of public transport in the Capital Region, operates according to a self-service system, where it is the passenger's own responsibility to secure a valid ticket or card before boarding, which can be presented upon request.

In cases where a valid travel document cannot be presented upon request, it must be accepted to have to pay an inspection fee, which for an adult amount to DKK 750. This basic rule is a prerequisite for the self-service system that applies to travel by public transport in the Capital Region.

The above is stated in the Common Travel Rules, which are on [Joint-National-Travel-Regulation-01012025.ashx](#). and this is also stated on the information boards that are set up at all stations. We have yellow call points. These can be found on all metro stations, and via those, you can get in contact with our control room, if you require assistance or directions.

The control room is staffed 24 hours a day. If they cannot help you, they can send a steward to the station.

For at give den bedst mulige rejseoplevelse for alle kunder i Metroen, bedes du overholde følgende ordensregler.



To provide the best possible travel experience for all passengers, you are required to abide to the following regulations.



Du kan benytte de gule kontaktpunkter til generelle henvendelser til Metroens kontrolrum ved at trykke på den grønne knap, INFO. Ved akut fare skal du trykke på den røde knap, ALARM.

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Travelling on the Metro requires a valid ticket. Tickets are available from ticket vending machines at the stations. Ticket control may be performed during the journey, when leaving the train and at the station after the journey has ended. Passengers boarding a train without a valid ticket will be liable to pay a fare evasion ticket.

In the specific case, the complainants were ticketed on October 23, 2025, (Inspection fee no. 01460270 at 10:07pm and inspection fee no. 01460271 at 10:10pm) on the route Christianshavn St. and Copenhagen Airport St. just after the train left Amagerbro St. According to the passenger possibly due to unstable internet connection in roaming. As the complainants could not present any form of valid travel document they each were an inspection fee in accordance with applicable regulations.

The Joint National Travel Regulations require that you have a valid travel document before boarding a bus, train, or subway

2.4. Use of travel document

Public transport in Denmark is an open system with widespread self-service, and **it is therefore always the customer's own responsibility to have a valid travel document upon boarding,** including ensuring that the Rejsekort has been checked in correctly. When receiving the travel document, the customer must make sure that the ticket is in accordance with the desired requirements.

2.4.2. Concerning the use of mobile products in particular (delivered via text message or app)

It is the customer's own responsibility to ensure that the travel document has been received on the mobile device before boarding. It is not sufficient that the order has been commenced.

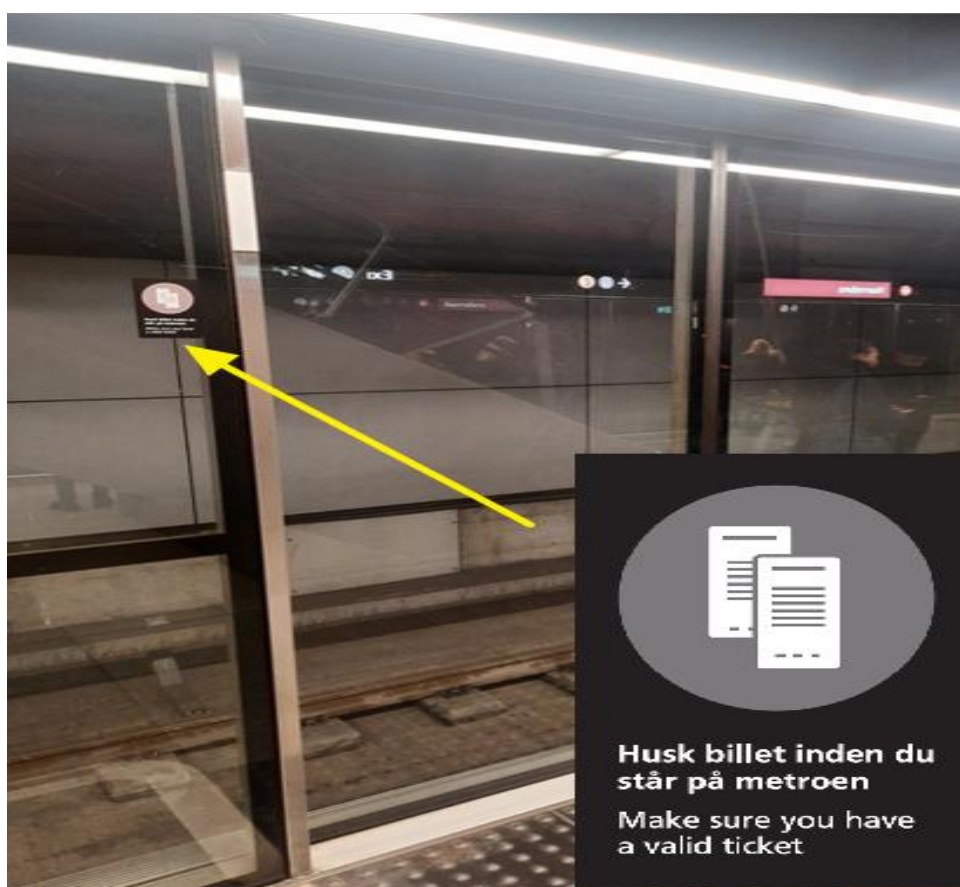
2.7. Inspection fee

2.7.1. Validity of travel documents

Customers who do not, when requested, present valid travel documents, including having checked in correctly on Rejsekort for their travel, **must pay an inspection fee.** This also applies if the customer has purchased a travel document via a mobile device that cannot be inspected, for example if it has run out of power or is broken.

The requirement for a valid travel document for every trip applies to everyone, regardless of the length of the trip, and prior knowledge of public transport generally.

There are signs at entry doors alerting passengers that they must have a ticket in their possession prior to boarding. (see below)



Further information can be found here: [Tourist in Copenhagen - How to travel](#)

Please understand that on the metro the stewards are under orders to issue an inspection fee to anyone who has boarded the metro and cannot present a valid travel document for ticket inspection, regardless of reason. They are not allowed to use warnings and must instead inform customers about their complaint options and refer them to customer service.

While I understand it can be difficult adjusting to the public transport system of another country, it is not possible for us to make exceptions to our national travel regulations based on how long a passenger has been in Denmark.

Finally at every station there is a ticket vending machine where it is possible to purchase tickets using cash or payment cards



We must emphasize that our steward acted correctly and in accordance with applicable regulations when issuing the inspection fees.

We have consulted the inspector who issued the inspection fees, and the steward cannot remember the actual situation. The steward confirms always to follow the instructed procedure when travelers cannot present a valid ticket which is to issue an inspection fee.

While we sincerely understand that this situation is unfortunate for the complainant, we want to treat all passengers equally. Consequently, we do not take into consideration whether the passenger has acted in good or bad faith, nor if the passenger intended to travel without a valid ticket. We only consider whether the passenger – prior to boarding – has ensured that they are in possession of a valid ticket which can be presented at any time on the journey.

Due to the above, we maintain our claim of DKK 750 for each inspection fee totaling DKK 1.500, -“

Klageren anfører herefter:

“First of all, I apologize for the possible expression because I used Google translate to understand what the people from the transport company wrote and to formulate a response back.

I will try to answer for each element in this document, then at the end I will make a general conclusion.

So, if I refer to the mention of Metro Service, the fact that the "Common Travel Rules" are indicated in several places on the panels and platforms,

- I answer that "Yes" the rules as an informative document, perhaps they are indicated, and yes even if we did not have the opportunity to read or study them due to the language barrier, even if there is no Metro in the Republic of Moldova, we know very well that the rules are for everyone, and that it is not allowed to circulate without a ticket on the train. For this reason, during the four days I was in Denmark, I respected the rules to the fullest extent, both in Copenhagen and in Helsingør (the saved tickets are attached for argumentation). For these reasons, we are going to request a justification for this case and to identify an amicable solution acceptable to all parties involved. (A more detailed and long explanation of this whole story was presented in the first letter addressed to Metro Service and you previously).

The fact that there are yellow emergency call points in the stations. - Yes, these may and do exist. Now it is difficult for me to say whether it was at the station from which he got off, or whether there was no such point, because I no longer have access to return to Denmark and go to the station to check all the elements indicated in the letter from Metro Service. However, these yellow points in the image look more like "Emergency Points" in case something serious happens on the platform or in the station, and do not seem to be an access point for tourists or visitors to contact a dispatcher who can explain how to purchase train/metro tickets.

Here it is mentioned about unstable internet roaming connection - a fact that we mentioned in our previous letters and what we tried to tell the controller who did not even bother to listen to us. We consider it right to help/guide us in the next station how to buy tickets. Especially since the distance traveled from the moment of boarding the metro and until the discussion with the controller, was only between the first and second stations. Any rule admits exceptions for travel on distances between two stations, and this could be an exception (maybe the traveler makes a mistake in the station-direction, maybe as in our case, we did not understand something).

I repeat the same comment above here on this remark. I also reflected this in message no. 2 to the transport company. That there was no guidance from the controller, nor any attempt to explain to us what was happening. The controller just told us to present the documents and he issued us tickets "on the spot". For this reason, we were very disappointed with the situation, because we only had to find out at the hotel reception that we actually had a fine and not tickets.

What about ticket machines - we tried to look for them in the station but we did not find them, only some yellow bars with blue lights where people scanned cards, which we did not manage to obtain a payment by scanning our bank cards. And when trying to communicate with travelers at the station, as I explained in previous explanations to the Transport Company, people told us that we had to buy tickets online. (I will attach a video found on the internet to the message that roughly shows our entrance to the metro station and the station inside where we did not find an automatic ticket machine).

Of course the controller doesn't remember the case because he has many cases a day. Or he makes me think he doesn't want to remember because he knows what approach he took and that he didn't make any effort to understand us. The easiest thing is to say "I don't remember the case".

Considering all our previous and present explanations, in our case, foreign short-term visitors who are not familiar with the rules and local aspects of Denmark, in the absence of a steward at the station, I consider it acceptable to board public transport, especially at a late hour in autumn, to contact a steward / inspector inside the public transport and obtain more information about purchasing tickets or procedures in case of lack of internet or ticket purchasing point at the station.

We condemn this decision of the transport company and the fact that they do not want to reach a common understanding, including the approach that the inspector had in relation to our request, and we consider the application of the fine (tax) incorrect.

We are responsible civil servants from Moldova, open to cooperation, and we note that we were and are willing to pay the cost of the transport ticket, even with a delay, but let us not be considered evildoers and associated with other ordinary people who regularly violate the internal rules of Denmark.

Please examine our case and make a correct and appropriate decision in relation to the created situation. Even though we are now already at home in the Republic of Moldova, we repeat that we are open to making the payment for the unpaid ticket during our 4-day trip to Denmark. At your decision, you can send us an invoice with the cost of the tickets and we will pay the necessary amount by transfer, including other procedural costs of inconvenience, except for the fee established by the transport company (fine).

Thank you for your understanding.”

Indklagede anfører herefter:

“We have closely read complainant’s comments.

While we sincerely understand that this situation is unfortunate for the complainant, we want to treat all passengers equally.

While I understand it can be difficult adjusting to the public transport system of another country, it is not possible for us to make exceptions to our national travel regulations based on how long a passenger has been in Denmark.

Consequently, we do not take into consideration whether the passenger has acted in good or bad faith, nor if the passenger intended to travel without a valid ticket. We only consider whether the passenger – prior to boarding – has ensured that they are in possession of a valid ticket which can be presented at any time on the journey.

Due to the above, we maintain our claim of DKK 750 for each inspection fee totaling DKK 1.500, -

Metro Service has no further comments to the case.”

Klageren anfører herefter:

”Thank you for the opportunity to comment on the latest reply submitted by Metro Service regarding appeal case no. 25-0476.

We have chosen to bring this matter before the Appeal Board because we are seeking a fair and objective examination of a situation which we believe is more particular than a standard case of travelling without a valid ticket. Despite our efforts to explain the circumstances, we did not feel that our situation was sufficiently understood or taken into account, neither during the inspection nor in the subsequent correspondence with Metro Service.

After reviewing their response, we would respectfully like to maintain my disagreement with the position expressed by Metro Service. While I understand the principle of the self-service ticketing system, I believe that the specific circumstances of our case deserve careful consideration.

We would therefore like to briefly highlight three key aspects.

1. Demonstrated good faith

During our four-day stay in Denmark, we consistently respected the rules of public transport and purchased valid tickets for several journeys by metro and train. The tickets submitted earlier as evidence demonstrate that we had no intention of travelling without paying and that we were acting in good faith throughout our visit.

2. Limited practical possibility to purchase a ticket

At the moment of entering the station we experienced unstable roaming internet, which prevented us from purchasing tickets online. We attempted to find a ticket vending machine but could not clearly identify one at the station. We also tried to ask other people present in the station for assistance; however, the individuals we approached were only able to direct us to the online ticket purchasing option, which was not functional in our situation. Instead, we saw only validation poles that appeared to require a pre-existing travel card.

While Metro Service indicates that ticket machines exist, the lack of clear directional signage and guidance can create confusion for passengers unfamiliar with the Danish system. The signs visible at the station indicate that travelling without a ticket is prohibited, but they do not equally guide passengers to the place where tickets can actually be purchased when the online option fails.

3. Proportionality of the sanction

The inspection took place shortly after boarding, between the first and second stations. We attempted to explain the situation to the steward, including the technical problem with purchasing tickets, but no assistance or guidance was offered on how to obtain valid tickets at the next station.

In such circumstances, where passengers demonstrate willingness to comply with the rules and the travelled distance is extremely short, we respectfully believe that issuing the full inspection fee may not represent the most proportionate outcome.

For these reasons, we kindly ask the Appeal Board to reconsider the proportionality of the inspection fees totaling **DKK 1,500**.

We would also like to reiterate that we remain fully willing to pay the cost of the transport tickets for the journey concerned, as well as any reasonable administrative costs if applicable.

We would also like to add that we would gladly consider returning to Denmark in the future to participate in other events. While this experience has certainly made us more attentive to the formal requirements of the transport system, it has also highlighted certain practical shortcomings in the way information is communicated to passengers. In particular, we believe that it would be both reasonable and beneficial if stations provided not only prohibitive notices, but also clear and visible guidance—such as directional signs, maps, or floor indicators—showing where tickets can be purchased, especially in situations where digital solutions are temporarily unavailable. Such improvements would significantly support tourists and foreign visitors in complying with the rules in good faith.

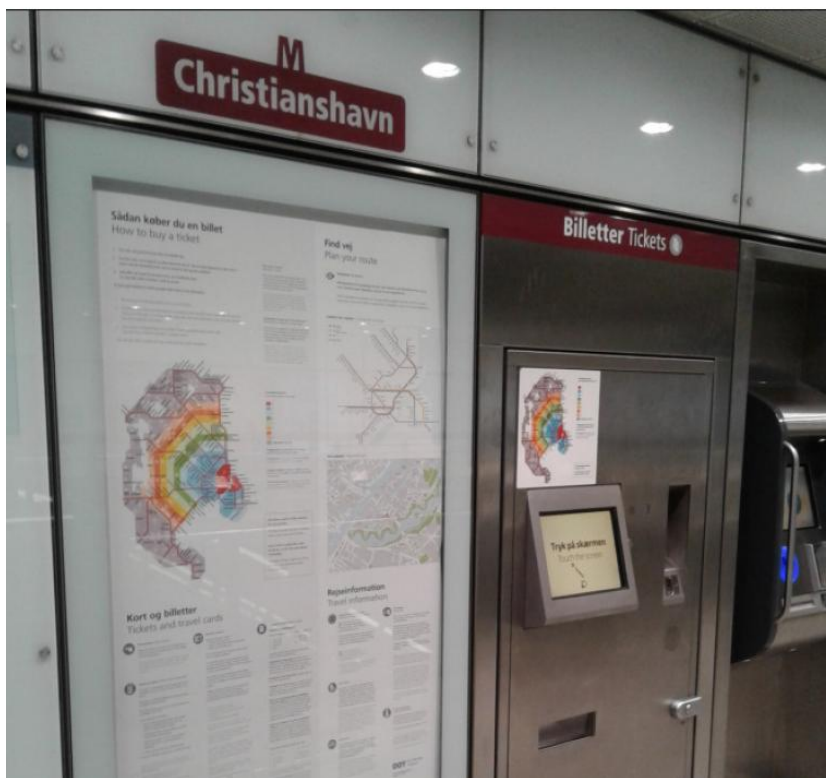
We place our trust in the Appeal Board's neutral and independent assessment and respectfully rely on your consideration, understanding, and careful attention to the circumstances of this case in reaching a fair final decision.

Thank you very much for your time and consideration.”

Indklagede anfører herefter:

“After reading the complainant's further comments, we must inform that the inspection fee will be maintained.

Ticket vending machines are visible as shown below at Christianshavn St. – at Concourse level.



While we still sincerely understand that this situation is unfortunate for the complainant, we want to treat all passengers equally. Consequently, we do not take into consideration whether the passenger has acted in good or bad faith, nor if the passenger intended to travel without a valid ticket. We only consider whether the passenger – prior to boarding – has ensured that they are in possession of a valid ticket which can be presented at any time on the journey. This cannot be affected by previously travel history.

Due to the above, we maintain our claim of DKK 750 for each inspection fee totaling DKK 1.500, -

We consider this case fully informed and have no further comments.”

Klageren anfører følgende:

“Thank you for forwarding the latest reply from Metro Service dated 19 March 2026 and for giving us the opportunity to submit our final comments in this case.

We would like to confirm that, after carefully reviewing Metro Service’s position, we respectfully maintain our disagreement and consider that the specific circumstances of our case have not been sufficiently taken into account.

We chose to bring this matter before the Appeal Board in order to obtain a fair and objective assessment of a situation which, in our view, differs from a standard case of travelling without a valid ticket. Despite our efforts to explain the circumstances, both during the inspection and in our subsequent correspondence, we did not feel that our situation was fully understood or assessed in its entirety.

We would like to briefly reiterate the key elements of our case.

First, our conduct throughout our stay in Denmark demonstrates clear good faith. During our four-day visit, we consistently purchased valid tickets for multiple journeys by metro and train. The documentation already submitted confirms that we had no intention of travelling without paying and that we were making genuine efforts to comply with the applicable rules.

Second, the situation on the day of the inspection was influenced by objective and practical difficulties. Due to unstable roaming internet, we were unable to purchase tickets online at that moment. At the station, we actively attempted to identify alternative ways to purchase tickets, including asking other passengers for assistance. However, we were unable to locate a clearly visible ticket vending machine, and the only visible equipment appeared to require a pre-existing travel card.

While Metro Service states that ticket machines are available, the lack of clear and accessible guidance—such as directional signs, maps, or other indicators—can create real confusion for passengers unfamiliar with the system, particularly for foreign visitors. The existing signage primarily emphasizes the obligation to hold a valid ticket, but does not equally facilitate the practical ability to obtain one in situations where digital solutions are unavailable.

Third, we consider that the proportionality of the inspection fee should be carefully assessed. The inspection took place shortly after boarding, between the first and second stations. We attempted to explain the situation to the steward, including the technical difficulties we encountered, yet no guidance or opportunity was offered to regularize the situation at the next station.

In light of these circumstances—our demonstrated good faith, the practical obstacles encountered, and the extremely short distance travelled—we respectfully believe that the imposition of the full inspection fees totaling DKK 1,500 may not represent a proportionate outcome.

We would also like to reiterate that we remain fully willing to pay the cost of the transport tickets for the journey concerned, as well as any reasonable administrative costs if deemed appropriate.

Furthermore, we would like to add that we would gladly consider returning to Denmark in the future to participate in other events. While this experience has made us more attentive to the formal requirements of the transport system, it has also highlighted certain practical aspects that could be improved. In particular, clearer and more visible guidance within stations regarding where tickets can be purchased—especially in situations where digital solutions are temporarily unavailable—would greatly assist tourists and foreign visitors in complying with the rules in good faith.

Finally, we would like to express our trust in the Appeal Board's neutral and independent assessment and respectfully rely on your careful consideration of all the circumstances of this case in reaching a fair and balanced decision.

Thank you very much for your time and consideration.”

På ankenævnets vegne



Lone Bach Nielsen
Nævnensformand