



EDF recommendations on the revision of the TSI-PRM 2019

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About the European Disability Forum (EDF)

The European Disability Forum (EDF) is an umbrella organization of persons with disabilities that defends the interests of persons with disabilities in the EU. It is a unique platform run by persons with disabilities and their families, and is a strong, united voice of persons with disabilities advocating for the implementation of the UN Convention on the Rights of Persons with Disabilities (UN CRPD) in the EU.

Introduction

EU [Regulation 1300/2014](#) on the technical specifications for interoperability relating to accessibility of the Union's rail system for persons with disabilities and persons with reduced mobility, also called "TSI-PRM", is an EU law that deals with the accessibility of trains and railway stations. EDF has been part of a working group of the [European Union Agency for Railways](#) (ERA) since 2011 which has helped drafting the Regulation and has thus been actively involved in shaping today's law. EDF is also a member of the European Commission Advisory Body on the TSI-PRM, which monitors the implementation of the law in Member States.

EDF bases its work on the United Nations Convention on the Rights of Persons with Disabilities (UN CRPD) that the EU, as well as all Member States, has ratified in 2010. [Article 9 of this Convention](#) requires all EU legislation to provide the necessary accessibility provisions to allow persons with disabilities to participate in society "on an equal basis with others".

Background

The TSI-PRM is an important law that has already improved access to rail travel for persons with disabilities a great deal since its entry into force in 2007. It obliges manufacturers and public authorities to equip new and refurbished trains with wheelchair accessible toilets, opening- and closing audio signals of the train doors, hearing loops at ticket desks, tactile markings on platforms, and many other accessibility features that were previously not mandatory. The law takes the form of a Regulation which means that it is directly applicable to Member States, without modification, and is therefore the strongest legislative tool that the EU can apply.



The 2014 revision of the law strengthened it even further, extending its scope to parts of the railway station and, amongst others, providing for a step-free route from the entrance of the station building to the platform. Another welcome improvement was that the revised law now applies to the entire railway network of the EU, whereas it previously excluded many domestic and local services.

In 2016, the ERA Working Party started a “small” revision of the text of the TSI-PRM in order to update some provisions that had not been included in the previous revision. However, it was made clear from the beginning that there was no political will to touch upon bigger issues in the text that would be of importance for persons with disabilities. Therefore, only minor editorial changes were proposed.

Within the limits of those restrictions, EDF suggested changes and made recommendations to still try and make rail travel more accessible to persons with disabilities, e.g. by improving the contrast requirements for printed and on-screen information or by raising the length limit for wheelchairs on boarding aids. While EDF expects a more thorough revision in the coming years that will hopefully tackle more fundamental issues such as the different platform heights throughout the EU and the lack of adequate boarding aids, for now we give our comments on draft text of the TSI-PRM revision for October 2019.

EDF comments on draft TSI-PRM submitted for consultation

Other definitions

Interoperable wheelchair transportable by train

An interoperable wheelchair transportable by train is a wheelchair the characteristics of which permit the full usage of all features of a rolling stock designed for wheelchair users. The characteristics of an interoperable wheelchair transportable by train are within the limits specified in appendix M.

EDF recommendation: The train should be adapted to various types of wheelchairs and not the other way around. That is why we have the TSI-PRM.



Rolling Stock subsystem

Providing services on-board trains¹

When a service is provided to passengers in a specific area of a train that cannot be accessed by wheelchair users or other PRMs, operational means shall be in place to ensure that:

- free of charge assistance is available to assist wheelchair users reach the service or
- the service is delivered free of charge to wheelchair users at the wheelchair spaces unless the nature of the service makes it impossible to provide it remotely.

EDF recommendation: this service should not only be limited to wheelchair users, it can also be provided to persons with other types of disabilities with similar difficulties; e.g. somebody who is using a walking frame. It should be clarified that this service cannot be charged for in addition to the regular ticket price and standard services.

Assessment: on-site visits by Notified Bodies (NoBos)

The Working Party debated in depth about the role of Notified Bodies (NoBos) for the assessment of stations. During the revision of the PRM TSI conducted in 2011-2014, the number of parameters that NoBos have to check on-site was considerably reduced. As expressed in the report made during that revision: *“most of the parameters related to stations in the PRM TSI can be easily assessed with a simple ruler: door width, marking of transparent obstacles, presence of information, ... for all those parameters, it is expected that the realization on site will comply to the approved design and therefore the revised TSI does not require the on-site inspection by a Notified Body”*.

The return of experience shows that the assessment of these parameters is not as easy as it seems and that to ensure a proper accessibility requires expertise. Works in stations being generally performed by subcontractors of the Station Manager, the solutions designed with expertise are often not implemented with the same level of expertise, resulting in mistakes/omissions caused by a misperception of the importance of some parameters. NB-Rail provided several examples of stations showing severe non-conformities to the PRM TSI while the design was compliant.

¹ This case is based on a complaint to the Ombudsman in Finland. EDF thinks that the solution proposed in the TSI is not sufficient. It does not cover all disabilities but only wheelchair users. Also, the solution in the TSI should aim at making all areas of the train accessible instead of opting for the “service at the wheelchair space” solution. This is not ambitious enough.



European Association of Infrastructure Managers (EIM) expressed concerns about the role given to NoBos by the Interoperability Directive. EIM would like to work together with the NoBos during the course of projects and not only at the end. Therefore, EIM is opposed to the site inspections. However, it is clear that NoBos must not act as consultants and therefore, to ensure the correct application of the PRM TSI, we strongly believe that reintroducing on-site visits are crucial.

EDF recommendation: reintroduce the on-site visits to ensure more effective monitoring of compliance with the Regulation.

Appendix M Interoperable wheelchair transportable by train

M.1 SCOPE

This appendix identifies the maximum engineering limits for an interoperable wheelchair transportable by train. These limits are used for designing and assessing the rolling stock (architecture, structure, layout) and its components (access doors, internal doors, seats, toilets etc.). When the characteristics of a wheelchair exceed these limits, the conditions of use of the rolling stock might be degraded for the user (for instance no access to the wheelchair areas). Exceeding some limits may prevent the user to access the rolling stock. Those limits are defined by each railway undertaking as specified in the point 4.2.6.1 of the TAP TSI.

M.2 CHARACTERISTICS

The minimum technical requirements are:

Basic Dimensions

- Width of 700 mm plus 50 mm min each side for hands when moving.
- Length of 1200mm plus 50 mm for feet

EDF recommendations: The length of the basic dimensions should be increased from 1200 mm to 1400 mm, preferably even 1500 mm to include mobility scooters, etc. In Denmark DSB has stated the limit of the length of a wheelchair/mobility scooter to be max. 1400 mm, as is the general length of the lifts in buildings and stations, and the length of the Danish boarding lifts used for boarding the trains. Links:

https://www.dsb.dk/globalassets/produkter_og_services/pdf/handicapservice_august2017.pdf

<https://www.dsb.dk/find-produkter-og-services/handicapservice-i-dsb/>



Weight

- Fully laden weight of 300 kg for wheelchair and occupant (including any baggage) in the case of an electrical wheelchair for which no assistance is required for crossing a boarding aid.
- Fully laden weight of 200 kg for wheelchair and occupant (including any baggage) in the case of a manual wheelchair.


EDF recommendation: The lifting capacity always to be minimum 300kg regardless of type of wheelchair.

Need for further improvement

In addition to the recommendations given for the current revision, EDF hopes that substantial gaps will be addressed during a foreseen comprehensive revision of the TSI PRM. As regularly flagged during discussions within the TSI PRM ERA Working Group, we note that the following aspects of the Regulation need further attention²:

- Need for common platform heights and level access between stations and rolling stock.
- Need for more than one wheelchair space per carriage. Persons with disabilities should be able to travel in groups like everyone else.
- Freedom and possibility of choice between 1st and 2nd class for wheelchair users.
- Accessible emergency breaks for wheelchair users.
- Rotation radius inside toilet: The existing measurements only consider manual wheelchair access, and current 'universal toilet' standard does not provide sufficient space for all wheelchair users.
- Need for foot rest for persons of short stature.
- Need for sufficient space for guide dogs both in 1st and 2nd class in all new rolling stock. The places need to be available from reservation until last minute for a guide dog user.
- Right of guide dog users to a second free of charge seat for the guide dog on all existing rolling stock.
- Mandatory door opening and closing signals for all renewed and upgraded rolling stock.

² EDF will publish a final detailed position ahead of the next TSI PRM revision, which is likely to incorporate further issues in addition to the above mentioned.

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- Need for design for all approach to accessibility to benefit wider diversity of passengers (e.g. persons with disabilities, persons with (temporary) reduced mobility, older persons, etc.).

Conclusion

Given this “small” revision of the text, EDF looks forward to the opportunity to address many of the major gaps during the next revision of TSI PRM (e.g. common target height for platforms or better solutions for boarding). In the meantime, some comments have been transferred to the Accompanying Report.

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