

# EDF input for the TSI PRM Revision Process

April 2024

The Regulation 1300/2014 on the Technical Specifications for interoperability relating to accessibility of the Union's rail system for persons with disabilities and reduced mobility (TSI – PRM) has greatly improved access to rail travel for persons with disabilities as it obliges manufacturers and public authorities to equip new and refurbished trains with accessibility features (such as wheelchair accessible toilets and opening / closing audio signals).

Despite the latest [amendments to the Annex of the TSI – PRM Regulation](#) (August 2023), EDF still believes that a more comprehensive revision of the text is urgently needed.

Taking into account the recent announcement to include the TSI-PRM in the next revision package, EDF would like to take the opportunity to draw attention pending issues that should be covered:

- Need for common platform heights and level access between stations and rolling stock to allow for independent access. Assisted access is not acceptable.
- Need to address the inaccessibility of restaurant cars and double decker vehicles (now an exception allowed in the TSI-PRM).
- Need for more than one wheelchair space per carriage. Persons with disabilities should be able to travel in groups like everyone else.
- Need to Increase space for wheelchair is transportable by train. At least, the length of the basic dimensions should be increased from 1200 mm to 1400 mm, preferably even 1500 mm to include mobility scooters. The weight should be increased to 600kg.
- Freedom of possibility of choice between 1<sup>st</sup> and 2<sup>nd</sup> class for wheelchair users.
- Accessible emergency breaks for wheelchair users.
- Rotation radius Inside the 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 footrest for persons of short stature.
- Need for sufficient space for guide dogs both in 1<sup>st</sup> and 2<sup>nd</sup> class in all new rolling stock. The places need to be available from reservation until last minute for a guide dog users.
- Right of guide dog user 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.
- Need for design for all approach to accessibility to benefit wider diversity of passengers (persons with disabilities, persons with temporary reduced mobility, older persons...)
- Need to improve the enforcement mechanisms of TSI-PRM. The role of the Commission should be strengthened to ensure proper implementation of the provisions by member states, including on-site visits.

Unless these gaps are addressed, we will continue with the paradox of TSI PRM compliant vehicles that are, in practice, inaccessible.

### **About 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.

EDF has represented passengers with disabilities in the TSI-PRM Advisory Body as well as the European Railway Agency (ERA)'s Working Party of the TSI-PRM. One of the deliverables of the ERA Working Group was the [Recommendation 128-2 of June 2020](#), which was addressed to the European Commission, and proposed amendments to the Annex of PRM TSI Regulation. Such changes were included in the revised Annex of the PRM TSI Regulation, [published in the official journal in August 2023](#).