



EDF proposals for the TSI – PRM revision (accessibility of railway system)

European Disability Forum Position Paper
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EDF's priorities and proposals for the revision of Commission Regulation (EU) No 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 (TSI – PRM)

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About the European Disability Forum (EDF)

The European Disability Forum

The European Disability Forum is an independent NGO that advocates the rights of 100 million persons with disabilities in Europe. EDF is a unique platform which brings together representative organization of persons with disabilities from across Europe. EDF is run by persons with disabilities and their families. We are a strong, united voice of persons with disabilities in Europe.

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Executive Summary

The European Disability Forum (EDF) welcomes the announced revision of the TSI-PRM, as it represents an important opportunity to address existing gaps and improve access to rail transport for persons with disabilities. The main priorities for the upcoming revision should be:

- **Ensure level access and fully independent boarding.** This could be achieved by harmonizing platform heights through the adoption of a single standard value. The current diversity of platform heights (mainly 550 mm and 760 mm), both between and within Member states, remains one of the biggest barrier to independent and autonomous travel. EDF remains open to discussing alternative proposals provided they achieve the same outcome: independent and autonomous travel.
- **Update the definition of level access to effectively allow fully independent boarding.** The currently accepted horizontal and vertical gap of 75 x 50 mm is difficult to overcome by many people with disabilities, especially wheelchair users.

- **Require all types of rolling stock to be equipped with boarding aids for as long as level access is not the norm.** Staff operated solutions, such as platform ramps or lifts, are discriminatory and do not enable independent and spontaneous travel.
- **Remove the exceptions for double-decker vehicles,** which render them practically inaccessible for passengers with disabilities despite being formally compliant with the TSI-PRM.
- **Define clear accessibility requirements for restaurant vehicles and sleeping compartments,** ensuring that passengers with disabilities, including wheelchair users, can access them on an equal basis with others.
- **Improve the accessibility of train stations** by enhancing the signalling of platform edges and ends, strengthening the provision of visual information, further specifying the characteristics of platform seating facilities and harmonising tactile walking surface indicators.
- **Improve accessibility of rolling stock** by updating the characteristics of interoperable wheelchairs (Appendix M) to reflect standard wheelchair dimensions, improving the design requirements for universal and standard toilets, requiring door-finding signals, improving internal circulation and clarifying the provision of audible and visual information on board.
- **Strengthen implementation and enforcement** by requiring Member States to make concrete progress under their National

Implementation Plans (NIPs), including setting ambitious targets and clear timelines for the removal of existing barriers.

Ahead of the discussions at the European Union Agency for Railways (ERA), the European Disability Forum (EDF) reiterates that the primary objective of the TSI-PRM revision must be to ensure spontaneous and autonomous travel for passengers with disabilities. To achieve this objective, the focus must shift from a system primarily based on the provision of assistance to one that guarantees equal access, including through a higher level of accessibility in trains and stations.

About the TSI - PRM

[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) is a key legislative instrument that has already significantly improved access to rail travel for persons with disabilities.

For example, the TSI-PRM requires manufacturers to equip new and refurbished trains with wheelchair-accessible toilets and with audio signals for door opening and closing. It also obliges train stations to provide hearing loops at ticket desks, tactile markings on platforms, and many other accessibility features that were previously not mandatory.

As a Regulation, the TSI-PRM is directly applicable in all EU Member States, the need for national transposition. It is therefore one of the strongest legislative tools available to the EU to ensure harmonised accessibility requirements across the Union.

Despite the amendments to the [Annex of the TSI-PRM Regulation](#) adopted in August 2023, which were largely technical and limited to upgrading references, EDF continues to strongly advocate for a comprehensive revision of the text. Important gaps remain, leading to situations where vehicles and stations that are formally compliant with the TSI-PRM remain, in practice, inaccessible for many passengers with disabilities and reduced mobility.

In its [2025 concluding observations](#), the UN Committee on the Rights of Persons with Disabilities expressed similar concerns and encouraged the EU to revise the TSI-PRM in order to include comprehensive accessibility requirements that ensure independent boarding.

Following the European Commission's request to the European Union Agency for Railways (ERA) to revise the Technical Specifications for

Interoperability, including with regards to accessibility, EDF has prepared this document to highlight the outstanding issues that must be addressed in the revision. Where possible, the documents puts forward concrete technical proposals of improvement. This position paper is intended to guide EDF's engagement in the ERA technical meetings that will follow the Commission's request.

Part 1: Requirements for infrastructure and rolling stock

Level access and boarding aids

Equal access to rail transport for persons with disabilities means traveling independently (without external help) and spontaneously (without having to plan and notify their intention to travel)¹.

The way to ensure independent and autonomous travel is by designing rail infrastructure and rolling stock that meets the level access requirements (minimal horizontal and vertical gap between the platform and the door sill of the train).

While point 2.3 of the TSI-PRM already proposes a definition of level access (75 mm horizontally and 50 mm vertically), this is a gap that most wheelchairs' wheels cannot overcome.

- **EDF's proposal:** The target value for level access should be 0 mm horizontally and 0 mm vertically, with some deviation tolerances up to 50 mm horizontally and 25 mm vertically².

Meeting this requirement in real life can be challenging as countries often have different platform heights that are used by different models of rolling stock.

¹ Although the provision of assistance is regulated by the [Rail Passenger Rights Regulation](#), not the TSI-PRM, EDF would like to recall the need to eliminate the 24h prenotification time to request assistance.

² In Switzerland level access requirements are 50 mm x 30 mm.

- **EDF proposal:** the TSI-PRM revision should set requirements that allow for independent and autonomous travel. One way to achieve this could be by harmonizing platform heights and using low floor rolling stock. If the remaining gap is still too big, other solutions could be used, such as gap fillers in the platform, partially raised platforms or bridging plates (sliding steps) in the rolling stock. When using these solutions, it should be ensured that there are no obstructive edges. When needed, solutions should be available at different doors (to be able to board if one device is broken) and available at different parts of the train (not only at wheelchair accessible doors, especially in intercity / suburban trains³). EDF is open to discussing alternative proposals that achieve this result.

Since level access requirements are rarely met, the current version of the TSI-PRM (points 4.2.1.14 and 4.2.2.12) allows different types of boarding aids to bridge the remaining gap. These solutions can be movable steps, bridging plates, on-board ramps, on-board lifts and platform lifts and platform ramps.

- **EDF proposal:** the use of boarding aids (excluding bridging plates) can only be a temporal solution (with clear phase out targets).
- **EDF proposal:** while boarding aids are in use, prioritise those that are built in the vehicle (such as on-board ramps or lifts) over external ramps or monster lifts. Such devices should be able to lift heavy electric wheelchairs (up to 350 kg with occupants included) and include a back-up system in case of failure (such as a second boarding aids at another set of doors).

Keeping in mind platform ramps and platform lifts should be a temporary solutions until we achieve level access, the requirements in point 5.3.1.2

³ If only one door provides level access, then passengers using wheelchairs, bicycles, heavy luggage and other passengers with reduced mobility will accumulate in that compartment.

and 5.3.1.3 should be amended to improve use by persons with disabilities.

- **EDF proposal:** for platform ramps, the maximum gradient allowed should be 8% and a minimum clear width of 800 mm (now it is 18% gradient and a minimum clear width of 760 mm)
- **EDF proposal:** the platform lift shall have at a surface level, a minimum clear width of 900mm (now it is 800 mm) and a minimum clear length of 1400mm (now it is 1200 mm), preferably 1500mm, and a withstand a weight of minimum 350 kg. The bridging plate overriding the gap between the lift platform and the carriage floor should also have a minimum width of 800 (now it is 760 mm).

Point 4.4.2.14 requires operational rules for the use of manual and powered wheelchair boarding aids, ensuring use with minimal physical effort and procedures of operation in event of loss of power (for powered aids). Despite this requirement, some boarding aids are too heavy to be operated by only one person, making it difficult to use by on board or station personnel.

- **EDF proposal:** boarding aids should be designed in a way so they can be operated by one person with minimum effort.

Transparent objects (4.2.1.5 - 4.2.2.3.3)

The points on highlighting of transparent obstacles (4.2.1.5) and interior doors (4.2.2.3.3) require transparent objects in the obstacle-free route and rollingstock, including doors, to be marked. However, they do not specify the technical way to do it.

- **EDF proposal:** label the transparent objects with two clearly visible marking strips. The upper marking placed at a height between 1.500 mm and 1.600 mm and the lower one between 900 mm and 1000 mm. Both marking strips shall contrast with the background,

be visible from both sides and run across the entire width of the door or object. Where both the wall and the door are made of glass, there should be different markings to indicate where the entrance is located.

Door operating devices (4.2.1.3 – 4.2.2.3.2 – 4.2.2.3.3)

Current requirements for Door and Entrances in the obstacle-free route (4.2.1.3) and Interior Doors in rolling stock (4.2.2.3.3) require operating devices to be at a height between 800 mm and 1100 mm. For external doors in rolling stock (4.2.2.3.2), the placement of exterior opening control, operable from the platform must be between 800 and 1200 mm (800 mm and 1100 mm if the train is designed for single platform heights). The current text does not mention horizontal distance from corners.

- **EDF proposal:** require door operating devices to be at a height between 800 mm and 1000 mm and a horizontal distance of 700 mm from corners or other vertical obstacles⁴.

Tactile information (2.3 - 4.2.1.10 – 4.2.2.7.2)

The current definition of 'tactile signs' and 'tactile controls' (point 2.3) gives discretion to choose among raised pictograms, raised characters and braille lettering.

- **EDF proposal:** Tactile signs should always include both braille and raised lettering⁵. Raised pictograms on signs should only be used in conjunction with tactile text. Where space allows, tactile controls with raised pictograms should include braille lettering.

The points on visual information (4.2.1.10) and Signage, pictograms and tactile information (4.2.2.7.2) require the introduction of tactile

⁴ In line with TR EN 17621 (Point 9.3.8 on Door Hardware and Controls)

⁵ Not all blind and partially sighted users can read braille or raised characters. Both types of tactile text should be provided to accommodate their needs

information signage in toilets and lifts of stations as well as toilets, wheelchair accessible accommodation, open and close buttons of passenger accessible doors and call for aid devices in rolling stock.

- **EDF proposal:** extend requirements of tactile information signage to ticket machines, service devices and emergency buttons / devices.

Visual information (4.2.1.10 – 4.2.2.7)

When it comes to customer information in visual formats for infrastructure and rolling stock (4.2.1.10 and 4.2.2.7), the TSI-PRM does not require the use of pictures, sign language or easy-to-read format, including for the safety information.

- **EDF proposal:** introduce requirements to provide relevant information in pictures, sign language and easy to read formats.

In both points, typeface used for the provision of information needs to be easily readable. However, there are no requirements that specify how to achieve this technically.

- **EDF proposal:** define what an 'easily readable' font is (spacing, font, contrast, etc.).

Interoperability with personal devices (4.2.1.2.3)

Personal devices, such as mobile applications and universal remote controls, can improve route identification or information provision for persons with disabilities. However, only point 4.2.1.2.3 (route identification in infrastructure) seems to promote these type of solutions.

- **EDF proposal:** explore the use of these type of devices in rolling stock, such as Door Locator Beacons, which can be remotely activated (smartphone or remote control) to broadcast the carriage number and the train destination.

Part 2: Requirements for infrastructure

Platform heights

The current version of TSIs allows two values for platform height: 550 mm and 760 mm above the running surface (with a tolerance within -35 mm / 0 mm). This situation creates a significant barrier to persons with disabilities ever being able to obtain level access or fair access conditions when crossing the borders of EU, as countries choose different heights between them (and even within their own country). For example, platforms in [Belgium's railway network](#) currently consist of three heights: 288 mm, 550 mm and 760 mm.

- **EDF proposal:** one single nominal value for platform heights (specific numbers can be discussed).

Vertical circulation (4.2.1.2.2)

Point 4.2.1.2.2 (2b) requires the installation of tactile warning surface indicators only in the top of the stairs.

- **EDF proposal:** this requirement should be extended at the bottom of the stairs as well (before the first ascending step)⁶.
- **EDF proposal:** Clarify the distance between the markings and the first step. For instance, between 300 to 500 mm before the front edge of the step⁷

Point 4.2.1.2.2 (2a) requires contrasting bands in the first and last step, as a minimum.

- **EDF proposal:** Provide contrasting band in all steps (not only the first and last one).

The requirements for ramps could be further improved.

⁶ In line with TR 17621 – 2021

⁷ In line with TR 17621 - 2021.

- **EDF proposal:** specify that ramps should have straight flights (without curves)

Point 4.2.1.2.2 (3a) requires ramps to have a width of 120 cm measured at floor surface, when used as complement to stairs

- **EDF proposal:** the width of the ramp should always be measured between rails and require a minimum width of 160 cm. This requirement should be higher in busy stations.

The placement of the handrail in ramps and stairs could be better specified:

- **EDF proposal:** request the horizontal extension of the handrail beyond the first and last steps of a stair or at the beginning or end of a ramp⁸.

Point 4.2.1.2.2 (6) requires escalators and moving walks to follow standard [EN 115-1:2017](#) Safety of escalators and moving walks:

- **EDF proposal:** in case this is not included in the referred standard, a new requirement should mandate the installation of TWSI at the top and bottom of escalators and moving walks.

Horizontal circulation (4.2.1.2.1)

Point 4.2.1.2.1 (horizontal circulation) allows thresholds in obstacle-free routes to reach a maximum 2,5 cm.

- **EDF proposal:** This requirement should be reduced to a maximum of 1,5 cm (and bevelled when higher than 0,5 cm⁹).

⁸ In line with TR 17621 – 2021 (10.3.3)

⁹ In line with TR 17621 – 2021.

Handrails in stations (4.2.1.2.2)

The current point 4.2.1.2.2 (4) on vertical circulation requires stairs of 3 steps or more and ramps to have handrails on both sides and at two levels.

- **EDF Proposal:** specify that handrails shall continue uninterrupted at stairwells and intermediate landings.
- **EDF proposal:** handrails should be provided even on stairs with less than three steps.

Route identification (4.2.1.2.3)

While point 4.2.1.2.3 (route identification) requires the use of tactile and contrasting walking surface indicators, it also says that this requirement does not apply to obstacle free routes to and from car parks.

- **EDF proposal:** remove this exception.

Point (2) mentions the provision of a walking surface that has tactile and contrasting indicators. To ensure proper implementation, the concept used should be tactile walking surface indicators (TWSIs) and trackable elements. The mere fact that a pavement marker is different in shape and contrast does not make it trackable.

Point (3) allows the use of technical solutions using controlled audible devices or mobile apps as an addition or alternative to tactile walking surface indicators.

- **EDF proposal:** This point should be amended so it is only used as an addition, not alternative.

Point (4) requires use of tactile information in either braille, prismatic letters or numbers in handrails or wall.

- **EDF proposal:** The point should be amended so information is provided both in braille and raised characters (prismatic letters or numbers). When placed on the handrail, information should be

placed on the upper side of the handrail and ensure comfortable access by the reading hand.

Door operating devices (4.2.1.3 – 4.2.2.3.2 – 4.2.2.3.3)

While internal and external doors in rolling stock (4.2.2.3.2 and 4.2.2.3.3) require both visual and tactile contrast for door operating devices, nothing is said about this in the requirements for the obstacle-free route (4.2.1.3).

EDF proposal: operating devices on doors and entrances in obstacle free route should include tactile and visual contrast elements.

Floor surface (4.2.1.4)

Point 4.2.1.4 defines the characteristics of floor surfaces in train stations (to be slip resistant) and prohibition to have irregularities of more than 0,5 cm (with certain exceptions).

- **EDF proposal:** The point could be further improved by studying the possibility to add slip resistance value and only allow tactile walking surface indicators to go beyond the 0,5 cm limit (remove exceptions for thresholds and drainage channels). For drainage channels, the maximum allowed shall be 1cm in horizontal.

Accessibility of platform seats (4.2.1.7)

Point 4.2.1.7 on furniture and free-standing devices requires an area with seating facilities and a space for a wheelchair on platforms where passengers are allowed to wait for trains as well as waiting areas are required to provide. However, there is no technical requirement regarding the height of the seat.

- **EDF proposal:** Where more than one seat is to be installed in a pedestrian area, a variety of seat heights should be provided, with at least one each with a seat height of 380 mm, 480 mm and 580

mm from floor level. Where only one seat is installed, the seat height should be between 450 mm and 480 mm, and the seat should have both back support and arm rests¹⁰. Additionally, a requirement on Ischiatic support bench should be included.

Ticketing, information desks and customer assistance points (4.2.1.8)

This point describes the basic characteristics of ticketing, information and customer assistance points in stations. Among others, it requires the availability of a wheelchair accessible desk and induction loops. However, new requirements could be added to improve accessibility:

EDF Proposal:

- Provision of a sign language interpretation (either in person or remotely via videoconferencing with a remote interpreter).
- if there is a glass barrier between the passenger and salesperson at the ticket counter, it should be ensured that it is transparent non-reflecting, without interfering elements such as stickers or advertisements.
- Point (5) also requires the provision of accessible control machines with a minimum width of 90cm and length of 125cm. This point should be revised to make sure that all type of wheelchairs can use it.
- Point (4) should be updated so ticket vending machines are accessible to all persons with disabilities, not only wheelchair users or people of small stature. Additional features could include use simple use, keyboards with tactile indicator, audio and visual use. For this provision, a link with the European Accessibility Act should be established.

¹⁰ In line with TR 17621 - 2021. Apart from height, the TR also requires back support and armrest.

Visual information in infrastructure (4.2.1.10)

EDF proposal: improve the accessibility of visual information provided in stations by amending several points.

- Point 4.2.1.10 (1) should specify that the information to be provided should be easy to find and designed in the two-senses principle.
- Point 4.2.1. 10 (14) should be amended so that the horizontal scrolling speed for the information is decreased from the current 6 to 4 characters per second¹¹.
- Point 4.2.1.10 (15) should amend the formula to calculate the character height for maximum viewing distance. The new formula should be reading distance in mm / 50 = character height¹².
- Mark the wheelchair boarding location on the platform with the international wheelchair symbol on the platform. The meeting point should also be marked with tactile paving for blind and partially sighted passengers. Infrastructure managers should explore alternative solutions for those stations where different models of trains are used and have different location of wheelchair accessible doors.
- Explore requirements to ensure unobstructed proximity to display systems and that light is not reflected on their surface
- Clarify the typology of typeface that can be used.

¹¹ Visual information cannot be perceived if the scrolling text is too fast. This can affect people with different language and reading skills.

¹²Font sizes calculated using the current formula give smaller characters than those used in public areas.

Spoken information (4.2.1.11)

This point establishes the speech transmission information for spoken information (STI-PA).

- **EDF proposal:** explore the introduction of a PA dynamic level, as it allows for quietness when there are no trains or other noise sources around but increases the levels when they are present¹³
- **EDF proposal:** this point should specify that the information to be provided should be easy to find and designed in the two-senses principle.

Platform width and edge of platform (4.2.1.12)

The current requirements for platform width and edge (point 4.2.1.12) require the installation of visual marking and tactile walking surface to indicate the boundary of the danger area. However, the current TSI-PRM allows Member States to choose between two types of walking tactile indicators: a pattern indicating a hazard at the boundary of the danger area or a guiding pattern indicating a path of travel at the safe side of the platform. To improve safety for passengers with disabilities, attention patterns should always be available in both forms since one is orientational and the other one a warning. Besides, the train platform can be crowded, and blind and partially sighted passengers won't always be able to follow the central patterns.

- **EDF proposal:** Tactile walking surface indicators should always include an attention pattern indicating a hazard at the boundary of the danger area and a guiding pattern indicating a path of travel at

¹³ This allows neurodivergent people not to be overwhelmed by PA but also allows hard of hearing people to hear the PA when there are other noise sources active nearby. It also allows for train stations near homes, or in quiet places, to generate less noise, especially at night.

the safe side of the platform. The Tactile walking surface indicators should include visual contrast.

- EDF proposal: point 4.2.1.12(3) allows the minimum width of the platform to be the width of the danger area plus the width of two opposing freeways of 80 cm (160 cm), a dimension that can taper to 90 cm at platform ends. This point should be changed so the minimum width is two opposing freeways of 90 cm (180 cm) + danger area and maintained at platform endings.

End of platform (4.2.1.13)

The current requirements for end of platform (4.2.1.13) require stations to have either a barrier or a visual marking and tactile walking surface indicator with an attention pattern to indicate the end of the platform.

- **EDF proposal:** the end of the platform should always be a secured by a fixed barrier and a tactile walking surface indicator indicating attention patter. The barrier should be installed outside the clearance diagram in the form of a railing which shall have a height of no less than 1000 mm. The railing shall have a 100 mm wide tactile bar, the lower edge of which starts at 150 mm above the floor surface.

Track Crossings (4.2.1.15)

While point 4.2.1.15 defines the characteristics of level track crossings to be considered part of the obstacle free route and makes references to the requirements for blind and partially sighted passengers, it does not explain the technical ways of meeting such requirements.

- **EDF proposal:** explore ways to improve accessibility of track crossing for the blind and partially sighted. For example, if crossing lights are provided, some sort of audio signal should be provided.

When it comes to accessibility for other types of passengers, for example, those using a wheelchair or other mobility devices, the current TSI-PRM fails to specify how the crossing should be constructed (beyond slope or width allowed). Existing systems, such as bodan, could be explored.

- **EDF proposal:** explore if new elements should be added to ensure the accessibility of crossing tracks.

Point 4.2.1.15 (2) establishes some general requirements when safety chicanes are used as part of the step free route.

- **EDF proposal:** explore new requirements to improve accessibility of safety chicanes, including greater width.

Point 4.2.1.15 (3) requires crossings in obstacle-free routes to have visual and tactile markings at the beginning and end of crossing surface:

- **EDF proposal.** Explore new tactile and visual requirements to support perception of the crossing surface by blind and partially sighted

Turnstiles (4.4.1)

Point 4.4.1 requires that in those cases where turnstiles are utilized for ticketing control, operational rules are implemented so that persons with reduced mobility, including their assistive devices and assistance dogs, are offered parallel access through such control points. This special access shall permit wheelchair users, and may be controlled by staff or be automatic

- **EDF proposal:** the availability of a non-turnstile access point should be fully automated (and not require staff operation, as the wording currently accepts).

This point is also related to point 4.2.1.8 (6) which requires that If turnstiles are used, there shall be a non-turnstile access point available for use by persons with disabilities and persons with reduced mobility at

all operational times. However, "at all operational times" can prove problematic if this is also the way to leave the platform. If a train arrives later, all other passengers go through the turnstiles, and the route through the "non-turnstile access" ends at the "operational time." This is unsatisfactory for those affected and should be addressed.

Application of TSI-PRM to existing infrastructure (7.2.2)

While infrastructure that is renewed or upgraded needs to be TSI-PRM compliant, point 7.2.2 allows exceptions to certain elements of the obstacle free route (doors, lifts, ticket control machines, etc.)

- **EDF proposal:** the list of such exceptions should be reduced as some parts of the infrastructure can be adapted to be accessible.

Tactile walking surface indicators (new)

While requiring the installation of tactile walking surface indicators (TWSI), the current TSI-PRM does not specify their technical requirements. As a result, some are not high enough to be detected by the white cane or be felt under the shoes soles. They also differ throughout the EU.

- **EDF proposal:** further define the technical characteristics of tactile walking surface indicators to ensure coherence across the EU. A proposed technical requirement for the TWSI could be a profile height between 4 and 5 mm¹⁴. The base of the tactile, if any, should be measured separately (max of 3 mm over floor surface).

Prevent access in specific areas (new)

Sometimes, certain parts of infrastructure are not accessible for passengers (platforms not in use, escalators and lifts in maintenance).

¹⁴ In line with TR 17621 - 2021.

While this is often visually indicated, persons with visual disability might not be able to perceive such information, putting them at risk.

- **EDF proposal:** define operation rules to prevent passengers from accessing certain infrastructure areas or equipment when not in use.

Audible information in lifts (new)

A new requirement should be added to ensure that lifts providing access to the platform provide information on the specific track they provide access to. Lifts should also announce when they open on both sides.

Relief areas for assistance dogs (new)

A new requirement should be added to ensure that relief areas are available for assistance dogs at train stations.

Part 3: Requirements for rolling stock

Priority seats (4.2.2.1.2)

EDF proposal: The list of characteristics of priority seats (point 4.2.2.1.2) should be amended and expanded to:

- add new features such as sockets, USB port, headphone jack, dimmable reading light, emergency and call for aid devices, movable armrests. Such features should include accessible features, including tactile and visual information.
- change the height of each priority seat cushion from the current minimum 430 mm to a minimum of 450 mm above floor level.
- Define provision and signposting of space for assistance dogs.
- Consider the needs of people traveling with walkers or rollators

Wheelchair spaces (4.2.2.2)

The current TSI-PRM requires the provision of a minimum number of wheelchair spaces depending on the length of the unit. For example, 1 space if less than 30 m or 2 spaces if the length of the unit is between 30 and 250 m). This requirement does not require wheelchair spaces to be next to each other. Persons with disabilities should be able to travel in groups and it should be possible for wheelchair users to seat together.

For example, in [Switzerland](#), 4% of available seats in the train are accessible and usable for wheelchair users (wheelchair spaces and multifunctional areas), both in the 1st and 2nd class.

- **EDF proposal:** increase the number of wheelchair spaces in the rolling stock. One way to calculate this could be based on the number of seats (not the length of the rollingstock). The wheelchair spaces should allow passengers to travel together and be available in other train facilities, including restaurant cars.
- **EDF proposal:** assess the need to add a new requirement for the provision of wheelchair spaces in both the 1st and 2nd class.

Wheelchair spaces should also include new features:

- **EDF proposal:** if they are available in other seats in the same class, equip wheelchair spaces with power socket, USB port, dimmable reading light. If available and different from call for aid, they should also provide emergency button.

Point 4.2.2.2 (10) requires trains with a design speed higher than 250km/h to have a movable armrest that allows transfer from wheelchair space to passenger seat.

- **EDF proposal:** apply this requirement on trains at lower speed.

Point 4.2.2.2 (9) requires the availability of a seat for a companion to travel with a wheelchair user (with the same level of comfort as other passenger seats).

- **EDF proposal:** such seat should be designated / signposted, so it is always available for the accompanying person.

Doors (4.2.2.3.2, 4.2.2.3.3, 5.3.2.1, 5.3.2.2)

The TSI-PRM requires internal and external doors in rolling stock (points 4.2.2.3.2 and 4.2.2.3.3) to have a minimum width of 800 mm (1000 mm for external wheelchair access doors of trains whose speed is less than 250 km / h).

- **EDF proposal:** all doors to have minimum width of 900 mm. (including those with speed of more than 250 km/h).

Point 4.2.2.3.2 (5) requires wheelchair access doors to be labelled with a wheelchair symbol. However, it can still be difficult to find them if only few entrances are wheelchair accessible.

- **EDF proposal:** all external doors should indicate the direction of the nearest wheelchair accessible door. If the composition of the train changes often, alternative measures should be explored.

Internal automatic and semiautomatic doors need to include devices to prevent travellers from being trapped. However, the requirements for their use could be improved.

- **EDF proposal:** specify that such devices should prevent objects with a minimum diameter of 5 mm (like dog leads or long canes) from being trapped.

Point 4.2.2.3.2 gives the possibility to provide a door finding signal.

- **EDF proposal:** require the provision of a door finding signal in all rolling stock.

Point 4.2.2.3.2 (10) requires sound for door signals to be in the area local to the control device.

- **EDF proposal:** specify that the noise is located above or the side of the door opening (if the sound source is close to the button, it can be muffled from other passengers)

Point 4.2.2.3.3 (interior doors) and 5.3.2.2 (standard and universal toilets) require that the force to open or close a manual door shall not exceed 60N.

- **EDF proposal:** require the maximum force to be 25N¹⁵

While the distance of door controls from corners is an important element to ensure the accessibility of doors, there is no such requirement in the TSI-PRM text.

- **EDF proposal:** Controls at 700 mm distance from internal corners.

Point 5.3.2.1 (1) on interface of the door control device currently requires the door control device to be operable with a maximum force of 15 N.

- **EDF proposal:** reduce operating force of door control device to a maximum of 5N ¹⁶.

Visual information (4.2.2.7.2, 4.2.2.7.3)

According to Point 4.2.2.7.2 (7), if seats are identified by numbers or letters, the number or letter of the seat shall be displayed on or adjacent to every seat in characters not less than 12 mm high. Such numbers and letters shall contrast with their background. However, this is not enough to guarantee accessibility:

- **EDF proposal:** seat number information should be accessible from the aisle of the car to allow close-up and tactile reading. Therefore, should not be mounted in a panel above the window. Besides, the seat number information should be tactile identifiable (tactile characters and braille).

¹⁵ In line with TR 17621 – 2021

¹⁶ In line with TR 17621 – 2021

The dynamic visual information provided in rolling stock (4.2.2.7.3) should be improved. While the information needs to be displayed in the platform at a 50m interval, at the head of the train and outside the train on the platform side next to the entrance doors, the later can be omitted if information is provided in front of the train and on the platform.

- **EDF proposal:** always provide dynamic visual information outside the train, on the platform side next to the entrance doors.

Point 4.2.2.7.3 (4) accepts that displayed information of next stop is to be read from at least 51% of passenger seats (including 51% of priority seats) and all wheelchair spaces:

- **EDF proposal:** improve wording so this information is seen from all priority seats.

Point 4.2.2.7.3 should include new requirements:

- **EDF proposal:** dynamic visual information should provide updates on connecting trains, delays and platform changes.
- **EDF proposal:** Before a door opens, there should be a visual display indicating which side the door will open and the platform number. If both sides open, there should be information about the platform that provides a lift (if only available in one platform).
- **EDF proposal:** When trains with different destinations separate at a certain station, visual display systems should provide a separate information for each individual vehicle section.
- **EDF proposal:** In international journeys, dynamic visual information, including on the destination and next stop, should be provided in English on top of national languages.

Audible information (4.2.2.7.4)

EDF proposal: The accessibility of dynamic audible information provided in rolling stock (4.2.2.7.4) could be improved by introducing new requirements.

- In international journeys, dynamic audible information, including on the destination and next stop, should be provided in English on top of national languages.
- Dynamic audible information should include last time changes for connecting trains, including delays and platform changes.
- Door opening signal should be preceded by voice announcement indicating the side of the door that is opening and the platform number. If both sides open, there should be information about the platform that provides a lift (if only available in one platform).
- When trains with different destinations separate at a certain station, loudspeaker and audio display systems should provide a separate announcement for each individual vehicle section. This should also be the case for monitor system display (visual information)
- Information communicated verbally should be easy to understand for all users, spoken clearly and read slowly.
- When available, all dynamic audible information must also be transmitted to headphone jacks at every seat and displayed in clearly legible text on monitors¹⁷.
- Point 3 should be clarified so information on destination and current stop is provided while the train is stopped, and information on next stop is provided after departure.

¹⁷ Headphone jacks enable listening without background noise. They allow people with hearing impairments to access auditory information and continue to communicate effectively.

Height Changes (4.2.2.8 – 4.2.2.9)

Point 4.2.2.8 defines the characteristics for ramps and stairs inside the rolling stock. To improve accessibility, some parameters should be amended.

EDF proposal:

- Reduce the maximum slope in ramps to 12 % gradient.
- Reduce the maximum height of stairs to 180 mm (from the current maximum of 200 mm)
- Provide contrasting band in all steps (not only on the first and last one). Such contrasting band should also be applied to entry and exit steps.
- Provide tactile walking surface indicator at the top of the stairs. Clarify the distance between the markings and the first step. For instance, between 300 to 500 mm before the front edge of the step¹⁸
- Surface of steps to be slip resistant.
- Provide two uninterrupted handrails at different heights, especially in double decker trains
- Explore whether the technical requirements of point 4.2.2.9 could be aligned with those of TR 17621, especially when it comes to the diameter, distance from any adjacent surface or height from floor.

Access steps in rolling stock (4.2.2.11.2)

- **EDF proposal:** The point that sets the requirements of access / egress steps to the rolling stock (4.2.2.11.2) should explicitly prohibit the use of steps with large mesh gratings, as it can be

¹⁸ In line with TR 17621 - 2021.

dangerous for passengers with disabilities (white cane can get stuck and assistance animals might get hurt).

- **EDF proposal:** point 4.2.2.11.2 (4) requires that, as a minimum, the first and last steps are indicated by a contrasting band. This should be amended so all steps include contrasting band.

Carriage of assistance dogs (4.4.2.3)

Point 4.4.2.3 sets operating rules to allow that passengers traveling with an assistance dog are not charged extra.

- **EDF proposal:** ensure sufficient space for assistance dogs both in 1st and 2nd class in all new rolling stock (see proposal for priority seats). This can include a right to a second seat free of charge.

Combinations of rolling stock compliant and non-compliant with this TSI (4.4.2.18)

Point 4.4.2.18 allows that, when combinations of TSI compliant and non-compliant rolling stock are used, dynamic information systems, wheelchair space, universal toilet, wheelchair accessible sleeping accommodations or call for aids are not fully functional.

- **EDF proposal:** remove such exception

Provision of services on-board of train (4.4.2.20)

Point 4.4.2.20 requires operational rules to ensure that a service is provided directly at the wheelchair spaces free of charge when the area where the service is provided to other passengers is not accessible.

- **EDF proposal:** while the goal should be that all areas of the train are accessible so there is no need for a specific service at the wheelchair space, the operational rules should allow that other

passengers with disabilities, not only those on a wheelchair, can also benefit from such service¹⁹.

Toilets (5.3.2.2, 5.3.2.3, 5.3.2.4)

Point 5.3.2.4 defines the parameters of universal toilets, to be used by passengers with disabilities. Some elements could be improved.

EDF proposal

- Door width should be increased and consider the width of the corridor nearby. For example, a minimum width of 900 mm (from its current 800 mm) if the width of the corridor is 1000 mm. The smaller the corridor, the wider the door²⁰.
- The height of the toilet seat should be increased so it is placed between 460 and 500 mm (it currently allows 450 mm as a minimum allowed)²¹.
- Place higher call for aid device at a height between 800 mm and 1050 mm (from its current 800 mm and 1100 mm). Lower one at a height between 100 and 200 mm (from its current 450 mm).
- Increase rotation inside toilet
- At the side of the door at the door handle side, there shall be a free space of min. 300 mm, when the door opens away from you and min. 500 mm when the door opens towards you.
- The toilet sliding door system to allow partial small opening and then closing for an assistant to get out without revealing the PRM sitting at the toilet pan.

¹⁹ People walking with frames, for example, can also be affected by inaccessible rolling stock.

²⁰ Dynamic width of doorways is considered in the EN 16585-3:2017 Railway applications - Design for PRM use - Equipment and components on board rolling stock - Part 3: Clearways and internal doors.

²¹ In line with TR 17621 - 2021

- Better define the height of handrails inside the WC²².
- Apart from the horizontal handrails, consider introduction of vertical handrail next to toilet seat for better accessibility.
- The WC and washbasin (sink) shall be placed at a 90° angle to each other and with such a distance between the two that – when sitting at the WC – it is possible to operate the soap dispenser and the water tap at the water basin in front of you. This shall also be possible sitting in your wheelchair in front of the washbasin.
- Define the space needed for lateral, frontal and diagonal transfer²³ (currently there is no requirement for frontal transfer. Point 6 establishes a minimum clear space of 700 mm in front of toilet seat. Should be increased to 1500mm).
- Include a point on accessibility of soap dispenser and hand drying.
- More than only 1 accessible toilet per train (in case one does not work). Accessible toilets should be connected by an accessible route.
- Consider rotating space for better use of baby napping facilities. If new devices are installed, such as baby seats, they should also consider the needs of passengers in wheelchairs.
- Consider the needs of ostomized passengers.

Point 5.3.2.2 on parameters for standard and universal toilets should be amended.

EDF proposal:

- The centre of any door handle, lock or door control device on the exterior or interior of the toilet compartment shall be located at a

²² Use TR 17621 point 12.1 (Accessible toilets) as reference.

²³ EDF proposes alignment with TR 17621, which requires between 900 to 1200 mm wide space to at least one side of toilet pan. No other equipment may encroach on this space, except for the sink.

minimum of 800 mm and maximum of 1000 mm above the floor (from the current 800 mm and 1100 mm).

- Availability of a crutch holder next to the toilet and sink as well as a coat holder.

Point 5.3.2.3 on parameters for standard toilets should be amended.

- **EDF proposal:** the free width of the door should be minimum of 600 mm (from current 500 mm).

Boarding aids: on-board ramps (5.3.2.9)

Further define the requirements for on board ramps (point 5.3.2.9) to that they can remain in operation in the event of emergency, failure or evacuation.

Assessment of contrast for the rolling stock (6.2.3.3)

The contrast requirements in the rolling stock are to be required based on Annex A, point A.1 of the standard EN 16584-1:2017 Railway applications - Design for PRM use - General requirements - Part 1: Contrast. In the 2017 version of the standard required a very poor visual contrast, which was not in line with existing standards, like ISO 21542 and TR 17621. The standard was revised in 2025, but EDF does not have access to the latest version (it is a paid standard).

- **EDF proposal:** check if the current standard is good enough to be mentioned in the TSI-PRM. If not, the standard should not be referred.

Double decker vehicles

The TSI-PRM includes certain exceptions that allow double-decker vehicles to be TSI-PRM compliant while remaining, in practice, inaccessible to persons with disabilities. There is no reason why such trains should remain inaccessible.

- **EDF proposal:** remove existing exceptions for double-decker vehicles and find a way to make them accessible for persons with disabilities.

Upgrade or renewal of existing rolling stock (Appendix F)

This appendix lists cases where conformity with the TSI PRM is not mandatory when rolling stock is renewed or upgraded. The current version is very permissive, allowing rail companies to delay equal access for passengers with disabilities.

Appendix F points on Wheelchair Spaces, accessible sleeping accommodation and toilets require the installation of a call for aid device only if the vehicle has an electrical communication system that can be adapted.

- **EDF proposal:** the wording should be changed to make sure that if an electrical system is added during the refurbishment, a call for aid is installed as well (not only when there is a preexisting system as is currently the case).

The provision of a fully complaint universal toilet is only mandatory when existing toilets are completely renewed or upgraded, a wheelchair space is provided and a complaint universal toilet can be accommodated without structural alteration.

- **EDF proposal:** there should be more strict conditions to decide when a universal toilet cannot be added and to prove the reasons why the train can't accommodate such installation.

Other points could be further improved in order to advance accessibility, including the installation of wheelchair spaces or height changes.

Passenger external doors audible signals (Appendix G)

- **EDF proposal:** consider reviewing the acoustic signals to make sure they are not too loud or alarming for the actual use (for example, more moderate levels for informative sounds).

Size of the wheelchair (Appendix M)

The reference values used for the dimension on the wheelchair (Appendix M) are currently 700 mm (+ 50 mm in each side for hands) and 1200 mm (+ 50 mm for feet). The gap dimensions for wheels are 75 mm horizontally and 50 mm vertically. The maximum weight for an electric wheelchair is 300 KG (including occupant + baggage). The turning cycle is 1500 mm. These values do not represent the standard size of a wheelchair and should be amended accordingly:

- **EDF proposal:** increase the length from 1200 mm to 1500 mm. The lifting capacity should always be 300 KG as a minimum regardless of wheelchair type.

Some countries have already gone beyond the TSI-PRM requirements. In [Denmark](#), the dimensions allowed are 700 mm x 1400 mm. In the [Netherlands](#), the dimensions allowed are 700 mm x 1500 mm.

Restaurant vehicles (new)

The current TSI-PRM text lacks accessibility requirements for restaurant cars (or similar).

EDF proposal (non- exhaustive list)

- Establish requirements for the width of the corridor, space between tables, height of bars, vending desks and counters.
- Make sure that the accessible area of bar or restaurant vehicle is accessible from wheelchair spaces in the train.

- All items in the restaurant / kiosk / self-service should be accessible to persons with disabilities. This should include payment terminals, selector keypads and coins ingress.
- Vending machines should be accessible for persons with disabilities (even if not placed in the restaurant car)
- If there is an area where passengers can seat, at least two of the seats shall be wheelchair accessible.
- If there is an area where passengers can stand next to a table, at least one table shall be wheelchair accessible²⁴.
- The restaurant car should provide handrails and ischiatic support.

Sleeping compartments (New)

Point 4.2.2.10 provides minimum requirements for the wheelchair accessible accommodation. Additional things to consider are:

- Increase width of the door / corridors (from 800 mm to 1000 mm)
- Increase the ratio of accessible wheelchair accommodation per train (current minimum of 2)
- Improve placement of call for aid devices (decrease height of lower one)
- Require storage space for mobility devices inside PRM compartment
- Define position and accessibility of operating devices (light, plugs, door control, baby napping facility)

²⁴ In case there is a mixed area where passengers can seat and stand, the rule shall be the one regarding the seats at the table.

- Minimum accessibility features of basic elements (bed, power socket, washbin, shower, floor surface)
- Consider the placement of the bed for the accompanying person (putting second bed upstairs is not always the best option)
- Require accessible route between sleeping compartments, accessible toilet (if separate from compartment) and other facilities open to the public (restaurant cars, catering areas)
- Establish operation procedures relevant for PRM (i.e that passengers can ask staff to prepare bed linen)
- Accessibility for coaches (they are sometimes a cheaper option and wheelchair users should also be able to use them).
- Possibility to recharge mobility devices on board.
- Revise point 4.4.2.5 on operational rules to prevent non-reserved occupation of wheelchair accessible sleeping compartments to make sure it considers all situations that make the reservation difficult (delay, change of trains, rerouting...)
- Reduce noise disturbances. The wheelchair accessible accommodation should meet the same maximum noise level (dBA) standards as comparable sleeping compartments elsewhere on the train.
- Clarify point 4 on what are the 'actions expected from wheelchair users in sleeping accommodation'.

Passengers with disabilities can also travel in regular sleeping compartments couchettes and, therefore, they should also contain some accessibility features.

- Flashing light to know when someone is knocking at the door
- Information screens with real-time information, including auditory announcements)

- Visual contrast and tactile identification of relevant elements of sleeping compartments / couchette (Compartment and berth number, call for aid devices, available features such as USB ports and plugs, toilet and sanitary equipment.
- Accessibility of access control systems for sleeping compartments such as keypad, card reader and touch screen.
- Space for assistance dogs
- Operational procedures to make sur that travel instructions / kit, if distributed, is made accessible to passengers with disabilities.

Emergency button (New)

While points 4.2.2.2, 4.2.2.5 and 4.2.2.10 cover the installation of an accessible call for aid device in wheelchair space, universal toilets and wheelchair accessible accommodation, it is not clear that this call for aid device is equivalent to the emergency button that other passengers have at their disposal. While emergency call buttons are used for life threatening and dangerous situations, call for aid devices are used for situations where passengers with disabilities might require specific assistance.

- **EDF proposal:** the emergency button to be accessible to passengers with disabilities. When possible, Emergency buttons should be installed in the same place in all carriages so that passengers with visual impairments can find them quickly.

Point 4.4.2.7 requires operational rules to ensure appropriate response and action from staff in the event of activation of the call for aid device.

- **EDF proposal:** the emergency call must also run to a staff location with constant supervision during operating hours from which qualified assistance can arrive within a short time to assist.

Monitoring, implementation and enforcement

While the application of the TSI-PRM is mandatory for newly built train stations and rolling stock, it only requires the removal of existing barriers when infrastructure and vehicles are renewed or upgraded (subject to several exceptions).

Article 8 requires Member States to adopt National Implementation Plans (NIPs) setting out a strategy and priorities for renewal and upgrade. However, the implementation of the NIPs has been largely insufficient. The existing mechanisms are weak and allow inaccessible infrastructure to remain in place for extended periods of time.

- **EDF proposal:** article 8 should be revised to require Member States to make actual progress on NIPs and in eliminating existing barriers. NIPs should include concrete objectives, clear indications and ambitious timelines. They should ensure a balanced approach between urban and rural areas.

The European Commission should regularly and publicly report on the progress made by Member States and initiate enforcement actions (such as infringement proceedings) where progress is insufficient. Furthermore, Member States should be required to meaningfully and proactively involve organizations of persons with disabilities in the preparation, implementation and monitoring of NIPs.

Other considerations for TSI-PRM revision

- **Two-sense principle for information provision:** access to information is of paramount importance for passengers with disabilities. While the TSI-PRM already contains provisions to ensure accessible information in train stations and rolling stock, these provisions should be strengthened to fully reflect the two-senses

principle: all information provided audibly must also be provided visually, and vice-versa. This is particularly crucial in situations outside normal operations, such as delays, accidents or cancellations, where timely and accessible information is essential.

- **Design of boarding aids (1):** some boarding aids are designed exclusively for wheelchair users and lack essential features (like a support rail) for other passengers who might also require assistance such as passengers using walkers or rollators.
- **Design of boarding aids (2):** certain boarding aids are too heavy to be operated by a single staff member. As a result, they are rarely used by onboard staff and may only be operated by specifically designated station personnel, limiting their availability. As long as they are in use, manufacturers should construct manual ramps and lifts are ergonomic and that can be used by one single person with minimal effort.
- **Accessibility for persons with cognitive or neurodevelopmental disabilities.** This could include clear and intuitive wayfinding systems such as lines on the floor to help find platforms, amenities or pick-up points as well as the provision on easy-to-read formats. Additionally, the TSI-PRM should consider the availability of quiet rooms in big train stations.
- **Accessibility of vending machines:** vending machines are widely available in stations and on rolling stock, but are often inaccessible to persons with disabilities due to their poor design. Products may be difficult to reach, tactile and audible information is often lack and payment systems may be inaccessible. TSI-PRM revision should consider the minimum requirements in this respect.
- **Adapted bicycles:** while rail companies are increasingly accommodating bicycles, they should also consider the needs of

passengers with disabilities, who might wish to travel with their adapted bike (or tandem) like any other passenger.

- **Innovation and technology:** infrastructure managers and rail undertaking should explore the potential of emerging digital technologies to enhance accessibility. In cooperation with local and national organizations of people with disabilities, they should promote the use of new technological solutions that can improve access to audio information or improve orientation and guidance .

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