Webinar: "EU Rail Accessibility Legislation for Beginners: Explaining the TSI- PRM"

Questions & Answers Summary

All questions refer to [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 (TSI-PRM).

1) Scope of the TSI

Are dog toilets included?

No, dog toilets as they exist at some airports and bigger stations are not obligatory under the TSI-PRM.

Do stations have to have ramps at the entrance?

No, stations do not need to have specifically a ramp at the entrance. The TSI-PRM require an "obstacle-free route" within the station but this can also be provided by a lift. The following public areas of the station have to be accessible via an "obstacle-free route": stopping points for other connecting modes of transport within the station confines (for example, taxi, bus, tram, metro, ferry, etc.); car parks; accessible entrances and exits; information desks; visual and audible information systems; ticketing facilities; customer assistance; waiting areas; toilet facilities; platforms. The obstacle-free route should always be the "shortest practical distance". (For more information see section 4.2.1.2. of the TSI-PRM text).

Can you get pre-recorded written messages for persons who are deaf or hard of hearing?

The TSI-PRM does not say this specifically but it creates at least three different requirements that concern visual and written information for persons who are deaf or hard of hearing:

- Dynamic displays inside the train shall display the final destination or route of the train as well as the next stop of the train inside each vehicle. It has to be displayed such that it can be read from a minimum of 51 % of passenger seats inside each vehicle including 51 % of the priority seats, and from all wheelchair spaces. This information shall be displayed at least two minutes before arrival at the station concerned. If the next station is less than two minutes planned journey time away, the next station shall be displayed immediately following departure from the previous station (section 4.2.2.7.3. - Dynamic visual information).
- Audible safety instructions coupled with visible signals in case of emergency (section 4.2.2.7.1. – Customer information)

- When a door is released for opening a signal shall be given that is clearly audible and visible to persons inside and outside the train (section 4.2.2.3.2 – Exterior doors)

Is public transport (e.g. trams or metros) covered?

No, unfortunately the TSI-PRM only cover the conventional and high-speed rail systems in the EU. However, since it also covers stations including multi-modal hubs (e.g. a train station that also a metro station or a bus station attached), some of the requirements of the TSI-PRM also apply for public transport stations, but not the vehicles. (Art. 2 - Scope)

Do the TSI-PRM cover all trains and stations or just those that go across borders?

Yes, the TSI-PRM covers all trains and train stations in the whole of the EU. This is actually one of the biggest improvements that was made during the last revision of the text and EDF has advocated strongly for this widening of the scope – before it was limited to the so-called "Trans-European Networks" and excluded for example local and regional trains and stations.

However, the TSI-PRM still do not go far enough because it does not oblige Member States to make ALL trains and stations accessible immediately. For newly built stations and new trains it is obligatory. But for existing stations and trains that are being renovated, it leaves the choice up to the Member States to prioritize which stations should be made accessible first so that for example smaller stations can remain inaccessible for a long time to come.

A positive thing about the TSI-PRM is that Member States are obliged to define those priorities and make so-called "National Implementation Plans" (NIPs) to set clear goals over the next ten years to achieve accessibility step-by-step. The so-called "Inventory of Assets" will also serve as a tool to identify the main obstacles so they can be removed step by step. (Chapter 7 – Implementation of the TSI)

Is easy-to-read information covered? Are there any specific provisions related to cognitive disabilities?

No. The TSI-PRM recognize persons with intellectual disabilities as "Persons with Reduced Mobility" in the definition but there is no concrete provision on easy-to-read information. In fact, this is one of the main weak points of the Regulation that it does not sufficiently address intellectual or other "hidden" disabilities. (Section 2.2. Definition of 'person with disabilities and person with reduced mobility').

EDF is trying to introduce more specific reference to accessible information also via other EU laws, for example the revision of the Rail Passengers' Rights Regulation (1371/2007) or the proposed European Accessibility Act.

2) Inventory of Assets (IoA)

In Recital 6 of the TSI-PRM the "Inventory of Assets" is described as a tool, that "should enable obstacles and barriers to accessibility to be identified and their progressive elimination to be monitored." It will in fact be a central database in which the railway undertakings or other responsible bodies feed data on accessibility of stations. This data will also be publicly available so that passengers can search on the website to see how accessible a particular station is and make their travel

decisions and arrangements accordingly. Finally, passengers will have the possibility to give feedback and to monitor and evaluate the progress that has been made.

When will the IoA be available?

This is not fully decided yet but most likely the first phase of data collection will be finished in 2019. The public website will be launched after that, so probably around 2020.

Who will be able to introduce information?

First of all it will be the task of the so-called "station manager" to collect the information in existing stations to feed the database at the first stage. The "Station manager" can be designated by different entities but most likely it is somebody from the railway undertaking (e.g. SNCF, Deutsche Bahn, RENFE…) or the infrastructure manager (e.g. INFRABEL, ADIF, SNCF Réseau….). The second stage will be more relevant for passengers: via the public website it will be possible to give feedback to the "station manager" e.g. if information is outdated or incorrect and this will influence the decision of national authorities which stations should be made accessible and how.

Where can we find the IoA?

Since it is still in the testing phase, the website is not public yet. EDF and AGE will make sure to promote its use once the final version is ready.

Can we participate in the testing?

EDF and AGE are still trying to convince the European Commission to organize a testing session with "real-life users" similar to a focus group. We have already given feedback regarding usability and accessibility but we are insisting that it has to be tested by passengers that do not have previous knowledge of EU legislation or the TSI-PRM to make sure that everybody will be able to use it later. We have not received the confirmation for such a testing session by the Commission yet but if you are interested please e-mail us (marie.denninghaus@edf-feph.org) and we will forward your contact details to the European Commission.

3) Revision of the TSI-PRM

The very first version of the TSI-PRM dates back to 2007. In 2014, a revised version has been published (Regulation 1300/2014). EDF and AGE Platform have actively contributed to improve the current version of the Regulation. Since 2014, many related laws have already changed again so the responsible working party of the European Railway Agency (ERA), of which EDF and AGE are members, have been tasked with preparing another revision of the text which is likely to be adopted in 2019. However, this revision will only contain minor changes, mainly related to legal references and smaller issues.

Who are the stakeholders involved? Can a state organisation represent persons with disabilities?

The stakeholders involved in the revision and drafting of the text of the TSI-PRM are very diverse. There is the European Commission and the European Railway Agency who are in charge of making or changing legislation and who have set up the working group. Of course there are also the Member States, represented by the National

Safety Authorities for the railway sector. Then there is industry such as the train manufacturers, the railway undertakings, or the infrastructure managers, represented by their European associations (e.g. CER, EIM, UNIFE, etc.). There is a representative of the railway employees such as train drivers, conductors, or other on-board and station staff. Finally, there are also civil society organisations representing passengers such as EDF, AGE, and the European Passengers' Federation (EPF). A state organisation cannot represent persons with disabilities in this case since this would most likely represent a conflict of interest.

4) Other questions

Where can I find the national Mirror Groups and how can I join them?

The so-called "Mirror Groups" are set up by the national authorities and they discuss the issues that have come up in the EU-level working group in the context of the national situation. Usually they also have representatives of the government, industry, and other stakeholders to "mirror" the discussions on the EU-level. It is also very important that persons with disabilities and older persons are represented so we encourage you to participate. There is no official procedure to join those Mirror Groups but we can provide you with the contacts on national level. If you are interested please e-mail us (marie.denninghaus@edf-feph.org) and we will forward you the contact information of the national governments who are usually setting up the groups.

If the TSI-PRM relies also on voluntary European Standards, how can it be ensured that they are applied?

European Standards are indeed voluntary and have also some other shortcomings (e.g. the difficulty for persons with disabilities and older persons to participate in the drafting) but they are nevertheless a useful tool. Since they provide an "accepted means of compliance", i.e. a technical solution that has been recognized as fulfilling the requirements set out in the TSI-PRM, it is an insurance for the industry that if they use the Standard, it will be accepted by the authorities. Therefore, the Standards are usually used even though they are not compulsory because they make it easier for industry to comply with the rules instead of coming up with their own solutions.

What if the train is not staffed, who can operate the lifts for example?

EDF and AGE prefer of course to keep staff on-board of trains. However, this issue is not directly dealt with in the TSI-PRM because it focuses on the technical side of things. For the pure technical part of the boarding process it is in fact not strictly necessary to have staff on-board of the train (depending on the type of boarding aid of course) but you can have a ramp or lift integrated in the train which is operated by the driver. Since we advocate for independent and spontaneous boarding, this option is the preferred one because you do not need additional assistance or "monster lifts" that are located on the platform. We are aware though that there is even a trend towards "driverless trains" and in that case we have to ensure that boarding aids can be operated in an accessible way.

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