

OPINION

ERA/OPI/2014-4

OF THE EUROPEAN RAILWAY AGENCY

FOR

EUROPEAN COMMISSION

REGARDING

*QUESTION AND CLARIFICATION NB RAIL CONCERNING STAIRCASES REQUIREMENTS IN THE PRM TSI-
QC-INF-013*

HAL:

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1 General Context

1. In its letter referenced as MOVE/B.2/NM/fz D (2014) and dated on 13 May 2014 addressed to the European Railway Agency (“ERA”), the European Commission requested ERA to prepare a technical opinion regarding the Question/Clarification request numbered QC-INF-13 put forward by [the Infrastructure subgroup of] NB-Rail.
2. This question is relating to the requirements for staircases in stations as they are specified in the Annex to Commission Decision 2008/164/EC of 21 December 2007 concerning the technical specification of interoperability relating to ‘persons with reduced mobility’ in the trans-European conventional and high-speed rail system¹ (“PRM TSI 2008”). The Commission’s request and the NB-Rail question can be found in Annex 1 to this opinion.
3. NB-Rail is asking in its question whether the requirements that apply to stairs are applicable in the whole station area or only along the obstacle-free routes within the station area. The justification for this question is that the wording of the PRM TSI 2008 seems to require that the requirements apply only to “staircases on the main route” (without defining what the “main route” is) while the proposed revised PRM TSI² (“Revised PRM TSI”) seems to require that they apply only to “staircases on the obstacle-free routes”.

2 Legal Background

1. The PRM TSI 2008 indicates its scope, with regards to infrastructure, in the clause 2.1.1: *“The track, points, engineering structures (footbridges, tunnels, etc.), associated station Infrastructure (platforms, zones of access, including the needs of persons with reduced mobility, etc.), safety and protective equipment. This includes the accessibility of the public areas of the Infrastructure (including stations) controlled by the Railway Undertaking, Infrastructure Manager or Station Manager. This TSI is only applicable to the public areas of the stations and their zones of access controlled by the Railway Undertaking, Infrastructure Manager or Station Manager.”*
2. In its clause 4.1.2.3.1, the PRM TSI 2008 defines what an obstacle-free route is and requires that *“a minimum of one obstacle-free route is provided that interconnects the following points and services if provided: (...)”*.
3. The technical details relating to the obstacle-free routes are given in clauses 4.1.2.3.1 and 4.1.2.3.2.

¹ OJ L 64, 7.3.2008, p. 72

² RECOMMENDATION N. ERA-REC-02-2013/REC of [6th May 2013] on the adoption of the revised Technical Specification for Interoperability relating to ‘persons with reduced mobility’ (PRM TSI).



4. The revised PRM TSI received a positive vote during the RISC 69 in January 2014 (Item 03 - ST27EN03) and it is planned to be adopted by the Commission in the second half of 2014 in order to be applicable from 1 January 2015.
5. The revised PRM TSI indicates its scope, with regards to infrastructure, in the clause 2.1.1: *"This TSI applies to all the public areas of stations dedicated to the transport of passengers that are controlled by the railway undertaking, infrastructure manager or station manager. This includes the provision of information, the purchase of a ticket and its validation if needed, and the possibility to wait for the train."*
6. The revised PRM TSI defines the obstacle-free route in clause 2.3. In clause 4.2.1.2, it requires that *"obstacle-free routes are provided that interconnect the following public areas of the infrastructure if provided: (...)"*
7. The technical details relative to the obstacle-free routes are then given in clauses 4.2.1.2.1, 4.2.1.2.2 and 4.2.1.2.3 of the revised PRM TSI.

3 Analysis

1. In the PRM TSI 2008, requirements for the obstacle-free routes are under clause 4.1.2.3, while the requirements for stairs are under clause 4.1.2.15: both are subclauses of the same clause 4.1.2 that gather the functional and technical specifications for the infrastructure subsystem. This demonstrates that the requirements for stairs are not a subclause of the requirements for the obstacle-free routes. Consequently, requirements for stairs do not apply only to the stairs located along obstacle-free routes.
2. Clause 4.1.2.15 of the PRM TSI 2008 gathers several requirements for stairs: as explained in point 1 above, these requirements shall apply to all stairs that are in the scope of the TSI, unless otherwise specified in the requirement itself. This is the case only for the second requirement, which says that *"Staircases on the main route shall have a minimum obstacle-free width of 1 600 mm measured between the handrails. (...)"*. The requirement itself clearly specifies to which staircases it applies, the main route being defined by the applicant, together with the Notified Body, at the beginning of a project.
3. Similarly, clause 4.1.2.16 of the PRM TSI 2008 defines requirements for handrails: these requirements shall apply to all handrails that equip stairs and ramps within the scope of the TSI.
4. In the revised PRM TSI, the technical requirements for staircases and handrails have been gathered under the general clause 4.2.1.2 entitled *"Obstacle-free route"* because all routes that interconnect different areas of a station, within the scope of the TSI, are required to be obstacle-free routes. This



is clearly meant by the wording of clause 4.2.1.2 of the revised PRM TSI requiring: *“obstacle free routes shall be provided (...)”* where the clause 4.1.2.3 of the PRM TSI 2008 did only require: *“a minimum of one obstacle-free route shall be provided (...)”*

5. This does not mean that all parts of an obstacle-free route shall be equally accessible by all passengers: the definition provided in clause 2.3 of the revised PRM TSI clarifies that *“the route can be divided to better meet the needs of all persons with disabilities and reduced mobility. The combination of all the parts of the obstacle free route constitutes the route accessible for all persons with disabilities and reduced mobility”*. Consequently, there does not need to be a continuous and coherent tactile path to each staircase, provided that there is one staircase that is equipped with such a tactile path. But each staircase situated along a route interconnecting the public areas of the infrastructure within the scope of the revised PRM TSI is a part of an obstacle-free route, and as such it needs to satisfy the requirements of clause 4.2.1.2.
6. It can be reminded that the chapter 4 of the TSI describes the target system. It respects as much as possible the principles of the “design for all” approach, in particular the Equitable Use and the Flexibility in Use. The chapter 4 applies in particular to new subsystems for which it is reasonable to expect that the “design for all” approach will be respected; for existing subsystems, the transition to the target system is decided according to the stipulations of the chapter 7 of the TSI, that gives flexibility regarding the progressive elimination of obstacles so as to reach the target system.

4 The opinion

1. The Agency is of the opinion that, according to both the PRM TSI 2008 and the revised PRM TSI, the requirements for staircases (especially tactile and contrasting bands and double handrails) shall apply to all staircases within the scope of the TSI.
2. This is clearly meant in the PRM TSI 2008 by the structure of the document, with the requirements for stairs being independent and at the same hierarchical level that the requirements for obstacle-free routes.
3. This is also clearly meant in the proposed revised PRM TSI, according to which all staircases of a station, within the scope of the TSI, are parts of an obstacle-free route.
4. The Agency proposes to clarify the point above in the application guide of the revised PRM TSI, that is currently being finalised.

Valenciennes,

10 JUL. 2014

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Executive Director