

**OPINION**

*ERA/OPI/2015-7*

**OF THE EUROPEAN RAILWAY AGENCY**

FOR

*EUROPEAN COMMISSION*

REGARDING

*QUESTION OF NB-RAIL (QC-INF-017) CONCERNING THE DEFINITION OF STAIRS IN THE PRM TSI*

**Disclaimer:**

The present document is a non-legally binding opinion of the European Railway Agency. It does not represent the view of other EU institutions and bodies, and is without prejudice to the decision-making processes foreseen by the applicable EU legislation. Furthermore, a binding interpretation of EU law is the sole competence of the Court of Justice of the European Union.



## 1 General Context

1. In its letter referenced as Ares(2015)2028609 and dated on 13 May 2015 addressed to the European Railway Agency ("ERA"), the European Commission – DG MOVE B2 requested ERA to prepare a technical opinion regarding a request put forward by NB Rail in their Question/Clarification document n° QC-INF-017.
2. The question is relative to the applicability of the requirements expressed in the TSI PRM<sup>1</sup> for stairs of the Infrastructure subsystem: the TSI does not define the number of steps that constitute stairs. Are the requirements also applicable to a single step or are they applicable only from a certain number of steps?
3. NB-Rail suggests that the requirements for stairs shall apply to all stairs, even if they have only one step.

## 2 Legal Background

1. The TSI PRM defines the following requirements for stairs within the subsystem infrastructure:  
Point 4.2.1.2.2 (2): *Staircases on the obstacle-free routes shall have a minimum width of 160 cm measured between the handrails. As a minimum the first and last steps shall be indicated by a contrasting band and as a minimum tactile warning surface indicators shall be installed before the first descending step.*  
Point 4.2.1.2.2. (4): *Stairs and ramps shall be provided with handrails on both sides and at two levels.*  
However, the TSI PRM does not specify the number of steps from which these requirements apply.

## 3 Analysis

1. Regarding Infrastructure parameters in general, the TSI PRM classifies them according to the following criteria (point 4.2.1 (2) of the TSI):  
*The basic parameters that are specified in points 4.2.1.1 – 4.2.1.15 apply to the scope of the infrastructure subsystem that is defined in point 2.1.1; they can be divided into two categories:*

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<sup>1</sup> Commission Regulation (EU) No 1300/2014 of 18 November 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. OJ L 356, 12.12.2014, p. 110–178



- *Those for which technical details need to be specified, such as the parameters relative to the platforms and how to reach the platforms. In this first case, the basic parameters are specifically described and the technical details to be satisfied in order to fulfil the requirement are detailed.*
  - *Those for which technical details are not necessary to be specified, such as the value of ramps or the characteristics of parking places. In this second case, the basic parameter is defined as a functional requirement that can be met by applying several technical solutions.*
2. This classification aimed at enabling the harmonization of requirements, for all parameters that are not specific to railway, between railway stations and other public buildings. Obviously, many of the elements constitutive of a station, including stairs, are not only present in railway stations but also in other public transport buildings, libraries, museums, hospitals, etc... Further clarification how to assess those parameters “for which technical details are not necessary to be specified” is given in the application guide of the TSI PRM<sup>2</sup>. In the guide those parameters are called “parameters of the 2<sup>nd</sup> category”.
3. The requirements for stairs include:
- The need for a contrasting band on the step nose,
  - The need for tactile warning surface indicators before the first descending step,
  - The need for double handrails on both sides and at two levels. Where handrails are present, they may also be used as support for Braille or tactile information.
4. In terms of contrast, the TSI PRM expresses three requirements for the Infrastructure subsystem:
- In point 4.2.1.2.1 (2): “where thresholds are installed on a horizontal route, they shall contrast with the surrounding floor”;
  - In point 4.2.1.2.2 (2): “As a minimum the first and last steps shall be indicated by a contrasting band”;
  - In point 4.2.1.7 (1): “All items of furniture and free-standing devices at stations shall contrast with their background”.

#### **4 The opinion**

1. The Agency is of the opinion that stairs in a railway station should not differ from stairs in other public buildings provided that the requirements of the TSI PRM are fulfilled.

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<sup>2</sup> <http://www.era.europa.eu/Document-Register/Pages/TSI-Application-Guide-PRM-TSI.aspx>



2. Therefore, the Agency is of the opinion that the requirements for stairs shall apply from the number of steps defined in the national or regional rule applicable to the public buildings. According to the terminology used in the application guide of the TSI PRM, the number of steps constituting stairs would be a parameter of the 2<sup>nd</sup> category.
3. However, the Agency is of the opinion that a contrasting band is required for all stairs, even those constituted of one single step (this step constitutes an obstacle to be identified). The Agency considers that the general requirements about contrast that are present in the TSI PRM are sufficient to mandate the presence of such contrasting band from the first step.

Valenciennes, 17.12.2015

  
Josef DOPPELBAUER  
Executive Director



**ANNEX 1**

Letter referenced Ares(2015)2028609 dated on 13 May 2015





## QUESTION / CLARIFICATION

**CO-ORDINATION BETWEEN NOTIFIED BODIES**  
DIRECTIVE 2008/57/EC AND SUBSEQUENT AMENDMENTS  
ON THE INTEROPERABILITY OF THE RAIL SYSTEM WITHIN  
THE UNION

**QC-INF-017**  
Issue 01  
Date: 06.05.2015  
Page 1 of 2

### TITLE

DEFINITION OF STAIRS

**ORIGINATOR**

**SUBJECT RELATED TO**

SUBGROUP INF

TSI PRM 1300/2014  
Subsystem Infrastructure

### DESCRIPTION AND BACKGROUND EXPLANATION

#### Background

TSI PRM (1300/2014) defines the following requirements for stairs within the subsystem infrastructure:

- 4.2.1.2.2 (2) Staircases on the obstacle-free routes shall have a minimum width of 160 cm measured between the handrails. As a minimum the first and last steps shall be indicated by a contrasting band and as a minimum tactile warning surface indicators shall be installed before the first descending step.
- 4.2.1.2.2. (4) Stairs and ramps shall be provided with handrails on both sides and at two levels.

TSI PRM does not define for the subsystem Infrastructure the meaning of stairs/staircases.

National rules in various countries define, that requirements for stairs/staircases apply for stairs which have 3 or more steps.

#### Question:

Are the requirements defined in TSI PRM also applicable for stairs with only one or 2 steps? (one step that is higher than a threshold of 2,5cm as defined in 4.2.1.2.1. (2))

#### Additional Information:

TSI PRM defines in chapter 4.2.2.8 requirements for stairs in the rolling stock subsystem depending on the number of steps: Whereas for all steps a contrasting band is mandatory handrails at both sides and on two levels have to be provided only for stairs with more than 3 steps (for stairs with one, two or three steps "one handrail or other item that can be used for personal stability" may be applied).

### SUGGESTED RESOLUTION / INTERPRETATION

NB-Rail suggests the following solution:

**The requirements for stairs shall apply for all stairs, even if they have only 1 step.**

#### Explanation:

The requirement for a tactile and contrasting band acc. to chapter 4.2.1.2.2 (2) in order

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Page 2 of 2

to provide more attention is regarded (at least) equally important for short stairs. This is also following the concept for the rolling stock subsystem, where all stairs shall be equipped with a contrasting band.

Where the tactile warning surface indicators can cause misunderstanding and can be dangerous, national technical rules can be applied.

Handrails acc. to chapter 4.2.1.2.2 (4) provide on one hand "personal stability" for physically impaired persons and on the other hand they are usually the tactile signage for visually impaired persons to ensure a tactile route identification according to chapter 4.2.1.2.3 (4). Under these considerations handrails according to chapter 4.2.1.2.2 (4) shall be provided for all stairs. The concept for the rolling stock subsystem, that short stairs may also be equipped with alternative solutions providing personal stability does not fulfil the requirement on a tactile path and shall therefore not be applied for the infrastructure subsystem.

#### ORGANISATION(S) REQUESTED TO RESPOND (E.G. TSI GROUP, RISC, ERA ETC.)

ERA

#### DATE OF AGREEMENT AT NB RAIL PLENARY MEETING

06/05/2015 – PM 44

#### RESPONSE FROM ORGANISATION ABOVE