



## QUESTION / CLARIFICATION

### CO-ORDINATION BETWEEN NOTIFIED BODIES

INTEROPERABILITY DIRECTIVE AND SUBSEQUENT AMENDMENTS ON THE INTEROPERABILITY OF THE RAIL SYSTEM WITHIN THE UNION

**QC-INF-013**

Issue 02

Date 15/09/2016

Page 1 of 3

### TITLE

PRM INFRASTRUCTURE: STAIRCASES REQUIREMENTS OFFSIDE OBSTACLE-FREE ROUTE

### ORIGINATOR

ARSENAL RACE

### SUBJECT RELATED TO

TSI PRM 2008/164/EC

TSI PRM 1300/2014

### DESCRIPTION AND BACKGROUND EXPLANATION

*Notes to Issue 02*

*The Issue 02 takes the analysis and solution from the Technical Opinion of the European Railway Agency ERA/OPI/2014-4 of 10 July 2014 as approved at RISC 71 into account. Moreover, the references to the draft version of TSI PRM were replaced by the published TSI PRM 1300/2014.*

\*\*\*\*\*

**Question:** Are requirements for stairs mandatory for the whole station area or along the obstacle free route only (especially: tactile bands prior to stairs)?

Tactile bands provided offside the obstacle-free route would be tactile fields which are not connected to the tactile path. Concerning requirements for stairs, the TSI PRM 2008/164/EC refers to “staircases on the main route” (4.1.2.15); whereas the new TSI PRM 1300/2014 explicitly refers to “staircases on the obstacle-free route”.

In both versions, the requirements concerning information for visually impaired (among them the tactile path) are only mandatory along the obstacle-free route.

### TSI PRM 2008/164/EC

#### 2.1.1 Infrastructure

[...] This includes the accessibility of the public areas of the Infrastructure (including stations) controlled by the Railway Undertaking, Infrastructure Manager or Station Manager. [...]

#### 4.1.2.15. Stairs

Staircases shall comply with European or National Rules.

**Staircases on the main route** shall have a minimum obstacle-free width of 1 600 mm measured between the handrails. [...]

Prior to the first ascending stair and also prior to the first descending stair there shall be a tactile band, over the whole width of the stair. This band shall have a minimum depth of 400 mm, shall contrast with and be integrated into the floor surface. This band shall differ to those used for the tactile guide path where installed. [...]



## QUESTION / CLARIFICATION

### CO-ORDINATION BETWEEN NOTIFIED BODIES

INTEROPERABILITY DIRECTIVE AND SUBSEQUENT  
AMENDMENTS ON THE INTEROPERABILITY OF THE RAIL  
SYSTEM WITHIN THE UNION

**QC-INF-013**

Issue 02

Date 15/09/2016

Page 2 of 3

### TSI PRM 1300/2014

#### 2.1.1 Scope related to Infrastructure

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. [...]

#### 2.3 Other Definitions

##### Obstacle-free route

An obstacle-free route is a link between two or more public areas dedicated to the transport of passengers such as specified in clause 2.1.1. It can be navigated by all persons with disabilities and reduced mobility. In order to achieve this, 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.

##### 4.2.1.2.2 Vertical circulation

(1) Where an obstacle-free route includes a change in level, there shall be a step-free route providing an alternative to stairs for mobility impaired people.

(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.

(3) Ramps shall be installed for persons with disabilities and persons with reduced mobilities unable to use stairs where lifts are not provided. They shall have a moderate gradient. A steep gradient is allowed for ramps on short distances only.

(4) Stairs and ramps shall be provided with handrails on both sides and at two levels.  
Both TSIs:

##### TSI PRM 1300/2014: 4.2.1.2.3 Route identification

Obstacle-free routes shall be clearly identified by visual information as detailed in clause 4.2.1.10. Information on the obstacle-free route shall be given to visually impaired people by tactile and contrasting walking surface indicators as a minimum.

##### TSI PRM 2008/164/EC: 4.1.2.3.2 Route identification

Obstacle-free routes shall be clearly identified by visual information as detailed in clause 4.2.1.11. Information on the obstacle-free route shall be given to visually impaired people by a minimum of one of the following means: e.g. tactile paths, audible, tactile signs, talking signs, Braille maps.



## QUESTION / CLARIFICATION

### CO-ORDINATION BETWEEN NOTIFIED BODIES

INTEROPERABILITY DIRECTIVE AND SUBSEQUENT  
AMENDMENTS ON THE INTEROPERABILITY OF THE RAIL  
SYSTEM WITHIN THE UNION

**QC-INF-013**

Issue 02  
Date 15/09/2016  
Page 3 of 3

### SUGGESTED RESOLUTION / INTERPRETATION

The requirements of both PRM TSIs are nearly identical for staircases; however they are defined through a different approach.

The TSI PRM 2008/164/EC defines the requirements for stairs regardless to the criteria of the obstacle-free route. Consequently, the requirements of stairs of chapter 4.2.1.15 are also applicable to staircases that are not on the obstacle-free route. The term "main routes" is used to describe all staircases between public areas.

The TSI PRM 1300/2014 defines in chapter 2.3 that the obstacle-free route is any link between two or more public areas. In 4.2.1.2.2 (2) the requirements for staircases are linked to the obstacle-free routes. Therefore all staircases on any link between two or more public areas have to fulfil the requirements of 4.2.1.2.2 (2).

According to both TSIs it is allowed (and this is also the purpose of the TSIs) to have staircases that are not linked to the guided path (tactile walking surface indicators) for visually impaired people. However, the requirements for width, tactile marking, contrast, anti-slip, handrails on both sides and at two levels always have to be applied.

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

ERA

### DATE OF AGREEMENT AT NB RAIL PLENARY MEETING

PM44, 06/05/15

### RESPONSE FROM ORGANISATION ABOVE

ERA issued the TO ERA/OPI/2014-4 on 10/07/14

Disclaimer: ERA TO always supersedes NB-Rail suggested solution in case of difference.

**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:

**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 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 system<sup>1</sup> (“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 TSI<sup>2</sup> (“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.

---

<sup>1</sup> OJ L 64, 7.3.2008, p. 72

<sup>2</sup> RECOMMENDATION N. ERA-REC-02-2013/REC of [6<sup>th</sup> 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

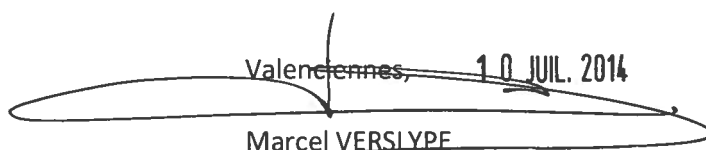


is clearly meant by the wording of clause 4.2.1.2 of the revised PRM TSI requiring: *“obstacle free routes shall be provided (...)”* where the clause 4.1.2.3 of the PRM TSI 2008 did only require: *“a minimum of one obstacle-free route shall be provided (...)”*

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  
  
Marcel VERSLYPE  
Executive Director