

ERA project PRM regulation – revision and development of NIP (National Implementation Plans)

Accessibility to heavy Rail was a COST 335 project based on EU money that made an investigation in accessibility to railway travel all over Europe, and listed a number of best practice examples. The final report was published in a conference in London 1999. I was one of the national experts in the working party and chairperson in the Station subgroup, one of four groups.

After that EU started a WG for implementing a regulation on PRM accessibility to railway, and a regulation was decided on in 2005, valid from 2007. I did not participate in that work.

The UN convention on accessibility, the EU policy on PRM generally and the influence from the American Accessibility Act, made a revision of the newly introduced regulation necessary. The ERA, that had led the first WG got the task to perform a revision, got a new task. That one was decided already 2008 and worked for several years. I was the EPF representative in that WG, where also representatives for EDF, for AGE and for certain other voluntary organisations were included. The revision was made thoroughly and finished in 2014 with a proposal of a revised regulation. That group had approximately 30 meetings during the years. ERA pays costs for participating.

However, it was clear that quite a number of complementary activities had to be done in order to fulfil the aims of the regulation. So there was a new complementary revision working party in 2015, as a result of the first revision. So a new WG was arranged, principally with the previous expert members, in order to work out an introduction of the new rules in the real world. I continued to be the EPF representative in that WG. Two or three meetings per year have been worked through.

In addition to the implementation WG the DG MOVE wanted to follow the work. The DG MOVE PRM Advisory Body was created in parallel in 2015. That has had two meetings up to now. I am the EPF representative in the Advisory Body. And the topic is only rail travel, and buses and ships are not focus of the work by ERA (European Union Railway Agency).

The work of the present revision WG is primarily to investigate the situation in the MS about how the accessibility has been implemented and which are the plans for implementing. A lot of work has been done in the “Inventory of Assets” (IoA), finding out how the stations and trains are equipped today. That is the first step and includes the number of full quality stations, not so well equipped stations and not equipped stations. The second step is that the MS have to describe their plans for implementation, their “NIP, National Implementation Plan”. All MS should present their NIPs by the 31 Dec 2016.

Most of the experts in the WG are representatives of MS Safety Authority (NSA) . They are civil servants working in authorities that have got their task from that perspective. Most of them are not especially updated on PRM topics.

Problems of IoA. It is clear that some countries already have quite good registers of how the stations are equipped, including staff service on spot. Among those are Germany, Great Britain, Netherlands, Sweden and Denmark. Some MS did not have much information, but could produce a NIP. However, the Inventory of Assets meant that the stations had to be scrutinized anew, using the regulation as a measure. The work to do the Inventory of Assets was outsourced by ERA to a company without discussion with the expert group. The firm chosen, a Spanish firm called Bilbomatica, is probably good as a consultancy,

but it did not know anything about PRM topics. They sent a questionnaire that had to be filled in and especially the information about the stations was not always available. The questionnaire was “checked” by the experts in two stations in Lille, but our comments of lacking factors were not taken seriously. The inventory did not really concentrate on the most important factors. Most of the delegates in the expert group were not aware of the lacking focus. The experimental questionnaire was still used as the permanent one.

However the idea to use the already existing knowledge in the existing national organisations did not seem to be used. Specifically I know that the Swedish NSA (Transportstyrelsen) found that making a real investigation about the equipment on all stations would have a cost that was far too high for being done, and by the way there were no station managers at all in Sweden (NSA told them there are five station managers at every station, but the EU does not accept that).

Another problem is the NIP. The national plan did not require a number of fully accessible stations, not even a percentage. The plan asked for a time schedule for implementing the accessibility on the rest of the stations, but there is no specific year required and no minimum quality or minimum percentage of stations. So the NIPs are really not worth much in the present condition.

Basic in the work is that ERA is not able to prescribe what the MS shall do. Only the Commission can do that. But ERA could well inform the DG MOVE Advisory Body about that. Next meeting is on the 12 October.

The DG MOVE Advisory Body planned meeting on 3 July was cancelled, since there were no real results. The ERA PRM WG had a meeting on the 29 June, that I sadly could not attend for health reasons.

The ERA handling, including the choice of Bilbomatica is not well done.

EPF Management Board
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