



QUESTION / CLARIFICATION

NB-Rail Coordination Group

According to Interoperability Directive (EU) 2016/797 art. 44
and Interoperability Directive 2008/57/EC art. 28.5

QC-INF-021

Issue 01

Date 02/07/2019

Page 1 of 3

TITLE	
PLATFORM HEIGHT - EXEMPTION TRAINS OUTSIDE LOC&PAS	
ORIGINATOR	SUBJECT RELATED TO
NOBo ARSENAL RACE GMBH	<ul style="list-style-type: none">- Commission Regulation (EU) No 1299/2014/EU - TSI INF- Amendment of Commission Regulation (EU) No 2019/776
AMENDMENT RECORD:	
DESCRIPTION AND BACKGROUND EXPLANATION	
<p>The aim of this question is to clarify the application and consequences of point 4.2.9.2 (3) in the annex of TSI INF (EU) No 1299/2014. As the sentence is being kept without change in the upcoming amendment of TSI INF 2014 (refer to point 4.2.10.2. (3)), some questions have to be clarified.</p> <p>The nominal platform height is defined in the annex of TSI INF in point 4.2.9.2 (1). Two nominal platform heights (550 mm and 760 mm) above the running surface shall be used.</p> <p>Within TSI INF several provisions for deviating from the nominal platform height are given, such as:</p> <ul style="list-style-type: none">a. Member states related specific cases detailed in point 7.7 of annex of TSI INF.b. Point 7.4. (a) For existing platforms it shall be allowed to apply other nominal platform heights for consistency with a particular upgrade or renewal programme of a line or a section of a line.c. Point 7.4. (b) For existing platforms it shall be allowed to apply other nominal platform heights, if the work requires structural alterations to any load bearing element.d. Point 4.2.9. (1) Nominal platform height requirement is only applicable for platforms where trains are intended to stop in normal service. ("Normal service" = The railway operating to a planned timetable service).e. Point 4.2.9. (2) It is permissible to design platforms required for the current service requirement provided provision is made for the reasonably foreseeable future service requirements. When specifying the interfaces with trains intended to stop at the platform, consideration shall be given to both the current service requirements and the reasonably foreseeable service requirements at least 10 years following the bringing into service of the platform.f. Point 4.2.9.2. (3) For platforms where trains, which are outside the scope of the LOC&PAS TSI, are intended to stop, different provisions for the nominal platform height might apply. <p>Exemption cases a. to e. detail several options where a newly built or upgraded platform does not need to meet the nominal platform height requirement. All these exemption</p>	



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QC-INF-021

Issue 01

Date 02/07/2019

Page 2 of 3

cases detail clear rules and constraints or refer to a “fixed” constraint like needed alteration to any load bearing element which is unlikely to change over the time.

Exemption case f., i.e. 4.2.9.2. (3) however can be easily misinterpreted in such a way that where older rolling stock is still intended to stop, different platform height might be realized without any further requirements such as it must still be in line with a particular renewal programme of a section of a line, etc. Older rolling stock in this context means wagons that had been put into service before TSI LOC&PAS came into force.

Example:

A rolling stock running on a specific line was put into operation in May 2009 before the TSI LOC&PAS for conventional railways came into force. Considering a service life of approximately 30 years it remains in service another 20 years.

In June 2019 on this specific line a platform is being renewed, expected service time another 60 years. For some reasons (which are none of the specified exemptions a. to e.) it is intended to build the platform at a different nominal height. To still gain an EC-certificate of verification, exemption f. is claimed as being applicable since on this line rolling stock outside of LOC&PAS is intended to stop. Note: “intended to stop” does not necessarily require *only* rolling stock outside of LOC&PAS stopping at this platform.

Legally, an EC-certificate of verification must be granted even without the provision of boarding aids by the infrastructure manager although clearly a non-interoperable situation has been created. The responsibilities to guarantee a barrier free access between infrastructure manager and railway undertaking are not defined in course of the EC verification of both subsystems INF and RST. Requirement of provision of boarding aids is defined in the annex of TSI PRM point 4.4.3. only. With the current legal framework both the infrastructure and the rolling stock subsystem may have a valid EC-certificate of verification without the platform/wagon doorway interface being validated.

We think that chapters 7.4 and 7.7 of TSI INF 1299/2014/EU already allow sufficient possibilities to not apply uniform platform height, which is not the aim of interoperability regulation and always shifts the problem to the producers of rolling stock.

SUGGESTED RESOLUTION / INTERPRETATION

The solution would be to erase exemption 4.2.9.2. (3).

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

ERA



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QC-INF-021

Issue 01

Date 02/07/2019

Page 3 of 3

DATE OF AGREEMENT AT NB RAIL PLENARY MEETING

PLE056, 26/06/2019

RESPONSE FROM ORGANISATION ABOVE

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