

# Air Travel Accessibility for Passengers with Disabilities

### Background

Air travel should be accessible to all passengers and therefore all stakeholders should work together to eliminate barriers to travel. The World Health Organization (WHO) has estimated that more than 1.3 billion people live with some form of disability, which constitutes approximately <u>16% of the world's population</u>. Furthermore, as the population ages, the proportion of people with disabilities grows.

The airline commitment to accessible air transport was reaffirmed at the 2019 IATA Annual General Meeting, when IATA members approved a <u>Resolution on Passengers with Disabilities.</u>

The UN Convention on the Rights of Persons with Disabilities (CRPD) requires its parties to take appropriate measures so that persons with disabilities have access, on an equal basis with others, to the physical environment, to transportation, to information and communication including information technologies and systems, and other facilities and services open or provided to the public both in urban and rural areas.

The Convention has also identified the need for international cooperation to create a legislative framework with a concrete, enforceable and time-bound benchmark for monitoring the gradual implementation of accessibility for all.

IATA supports the application of the provisions of the Convention into national regulation, including "the identification and elimination of obstacles and barriers" in transportation.

To promote consistent and coordinated airline policy and to ensure high-quality service provision, IATA calls on ICAO and its member states to develop comprehensive strategic planning that includes appropriate coordination mechanisms between states and provides a foundation for sustainable and transformative change towards accessibility in all pillars of aviation.

# Multilateral Collaboration and Global Standards are Key

States have shown a clear and positive interest in advancing accessibility for passengers with a disability. However, existing regulations are still fragmented and are mainly geared toward eliminating complaints in national jurisdictions, rather than laying the necessary foundations to achieve accessible and universal air transport in a global and coordinated way.

This does not help the industry to consolidate policies and processes and leaves room for interpretation.

By its very nature, international air transport involves multiple parties working together, operating into and out of more than one (national) legal jurisdiction every time an aircraft takes off or lands, and connecting to different carriers during a single itinerary.

The smooth functioning of this network requires a carefully coordinated industry approach to the standardization of certain functions.

### **Invisible Disabilities**

Negotiating the numerous processes involved in air transport can be a stressful experience for even the most seasoned travelers. It is especially difficult for those with so-called invisible disorders, such as deafness, autism, or dementia. Unfortunately, the very fact that these symptoms are invisible can lead to misunderstandings, false perceptions, and unfair judgments.

At present there is not a global understanding of invisible disability and the assistance to these passengers at airports and on board. There are already examples of good practice by airlines and airports. This includes communication of information

prior to travel and at the airport; awareness raising regarding the importance of advanced notification of assistance service; assistance at the airport for areas that are the responsibility of the airline; direct assistance onboard the aircraft; and assistance during flight disruptions.

# Shared accountability and common standards to help prevent damage to mobility aids

The safe handling of mobility aids including wheelchairs is a key topic to advance air travel accessibility. When damage or loss events occur, it can be devastating to the traveller as these devices are extensions of their body and crucial to their independence. It also represents a reputational issue for the airline.

At the root of the challenges in the loading and safe storage of mobility aids is the fact that few, if any of these devices, have been designed with air transport in mind.

There are several issues that work against the ability to transport them safely and without risk of damage or injury to loading staff that need to be addressed:

- The size & dimension of some mobility aids can create significant operational challenges during the process of navigating airports, loading, and off-loading.
- The weight of such devices can present risk of injury to ground staff during loading and unloading of these devices, often manually.
- The lithium-ion batteries that provide power to mobility aids can cause severe safety hazards if not properly handled during transport. Lithium-ion batteries are classified as dangerous goods for the purposes of transport.
- The design of airports is not optimized to transport mobility aids from the airport to the ramp and this operation often happens manually, to the detriment to the safe handling of the mobility aid.
- The design of many mobility aids and the design of aircraft cargo compartments on typical domestic single aisle and regional aircraft are incompatible. Many of these mobility aids cannot be configured to fit through the cargo compartment door and are difficult to secure once loaded.
- Lastly, there is often an information gap. The airline may not have the necessary information regarding the dimensions of a mobility aid that a passenger is using. And there may not be an easily accessible or dedicated channel for the passenger to communicate that information, including whether any special tools may be required to partially disassemble the device in order to facilitate loading.

In February 2023, IATA published <u>new guidance material</u>. Key elements include:

- Better processes for booking and information exchange, including the use of Special Service Request (SSR) and Passenger Name Requirement (PNR) codes to give advance information on the specifications of mobility aids
- A recommendation to create an electronic mobility aid tag, fixed to the mobility aid and containing technical information which will help airlines and ground handlers transport the aid safely
- Advice to airlines on developing a communications toolkit for engaging with passengers with disabilities, including a clearly signposted and accessible website area.
- Best practices for loading, collection and return of mobility aids
- A recommendation for dedicated specialized ramp personnel to be trained and deployed to handle mobility aids
- Guidance for how to properly resolve instances where mobility aids are damaged
- Revised and enhanced training of ground handlers and airline staff

# Standards and Certification for Trained Service Dogs

IATA supports the right of individuals with disabilities who have a legitimate need to travel with a trained and certified assistance dog.

Some regulations define assistance and service dogs, other leave space for interpretation creating chaos and confusion for airlines and passengers. For example, under the terms of the current EU Regulation 1107, there is no definition of service dogs and carriers are left to determine if service dogs is a legitimate service animal trained to work in a public setting and in support of a person with disabilities.

IATA suggests that state regulators engage in collaborative work to develop a global, consistent definition and standard for certified assistance dogs, so the industry and passengers have a clear guidance to reflect the acceptability of assistance animals.

This definition should include an explicit exclusion of Emotional Support Animals (ESAs). To this end, IATA urges state regulators to collaborate towards the introduction of a definition of an "assistance trained dog" that establishes parameters for the acceptance and use of assistance trained dogs in society more generally and not only in the narrow context of aviation.

For airlines, it is vital that this definition only includes dogs individually trained to do work or perform tasks for the benefit of an individual with a disability and at the same time clearly excludes all other species of animals, whether wild or domestic, trained, or untrained. This is a common-sense approach that recognizes that dogs are the primary species that can be trained to assist an individual with a disability (and be trained to behave in a public setting).

### The 'one person one fare' regulation is an expropriation of airlines' seats

One person one fare (1P1F) refers to the proposal that persons who are required to use extra seats, either for an accompanying carer or because they cannot fit in a single seat, be only charged the price of a single seat.

In the case of an accompanying carer, that person would effectively travel free of charge. At present this is not a legal requirement anywhere except on some domestic routes in Canada, although airlines in some countries have been "recommended" to offer this service.

The issue is a complicated one. A unanimous resolution at IATA's 75th AGM in 2019 committed IATA members to ensure 'Passengers with disabilities have access to safe, reliable and dignified travel', and the industry is working diligently with representatives of the disabilities community to improve travel for passengers with disabilities.

However, the industry does not support the 1P1F principle on several grounds:

- The finances of an air route are often precarious. The average airline profit per passenger in 2023 was \$2.25. This can equate to around 3-4 seats in total on a flight. If these seats are given away for free, then the financial viability of an entire flight could be threatened.
- The circumstances under which a disabled or very large traveler would require two seats are not easily defined and could be open to abuse. A lack of single global definition would create an unworkable minefield of unharmonized requirements which would confuse airlines and passengers alike.
- Under the UN Convention there are longstanding definitions of proportionality and the reasonable steps that should be taken to ensure people with disabilities have equal access. This is why, for example, not all legacy metro stations in key cities have step-free access the cost of retrofitting them all is disproportionately large. The same principle would hold for giving away free seats to disabled or obese passengers on aircraft.

Airlines remain committed to working with regulators and travelers with disabilities for proportionate and workable solutions to the various challenges of ensuring fair and equal access to air travel.

# Airlines record 30% yearly increase of wheelchair assistance requests at airports

The huge increase in wheelchair assistance requests by passengers who would not normally need assistance is a key issue for the aviation industry. To understand the scale of the problem IATA surveyed major airlines and the results suggest that:

- The increase in assistance requests at airports is significant and continuing to grow yearly with increases of +30% in bigger airports.
- The requests are more prevalent in certain geographies (e.g. flights to and from India, the United States, the United Arab Emirates and Europe).

Many assistance requests may come from passengers who do not have disabilities but who do not feel confident
navigating their way through a busy airport, or people who simply need directional assistance for whatever reason
including age.

This growing number of wheelchair assistance requests as a way to navigate airports is not sustainable for airports and airlines.

At present no regulation mandates the use of wheelchair as the sole methodology to support passengers in need. IATA therefore urges state regulators to encourage airports and assistance services providers to look at more sustainable solutions to address this issue.

The managing body of the airport is ultimately responsible for the provision of the assistance service and should therefore make all reasonable efforts to provide it in such a way that the individual is able to arrive at their departure gate on time and without undue delay.

Asking passengers to pre-notify the airline of any assistance requirements at the time of the booking would be very useful in ensuring the industry can provide a good service. It is IATA's view that the accessibility challenges faced at some of the European airports require a far more coordinated approach in the long term, in addition to closer engagement from the national and European regulators with airports and airlines.

### Accessibility information is one click- away from airlines' landing page

Clear information is crucial for anybody who wishes to travel. This is particularly relevant for persons with disabilities who require assistance and must carefully prepare their travel arrangements. While airlines have made strides in providing extensive guidance on their websites, there remains room for improvement, particularly in easing the search for specific information.

IATA has recently issued guidance material on ensuring airline websites provide easy access to all necessary information for travelers with disabilities. With the aim to ensure equal access for all passengers, this includes:

- Developing a user-friendly gateway to the dedicated accessibility area of airlines' websites,
- Clarifying the criteria for assistance entitlement, and
- Emphasizing the importance of passengers requesting assistance early, preferably during the booking process.

The guidance stresses a streamlined approach, enabling travelers with disabilities to access crucial information with just one click from the homepage. It provides best practices on creating clear and intuitive information pathways on airline websites for passengers with disabilities or reduced mobility, ensuring they have direct access to essential details about air travel arrangements and passenger rights.

### The future

IATA has committed to disability inclusion through its Annual General meeting in 2019 and reiterates its commitment by reviewing and updating its policy, standards and recommendations to providing safe, reliable, and dignified travel to passengers with disabilities and the aging persons.

### • Prioritizing disability inclusion as part of the sustainability agenda.

Provision of Accessibility Services is vital to ensure that everyone can participate fully in society. IATA will continue engaging with governments agencies, international organizations, stakeholders, and representatives of the disability community to advance air transport accessibility and disability inclusion altogether. The goal is to be pragmatic and ensure that the development of accessibility regulations and practices is balanced and delivers clearly defined, measurable policy objectives to provide a safe and positive travel experience to everyone.

### • Supporting ICAO to deploy their accessibility priorities

The 2022 ICAO General Assembly adopted a historical resolution on accessibility for passengers with disabilities and tasked the Council to develop a work program on accessibility for passengers with disabilities in order to reach for a

disability-inclusive air transport system. The resolution also endorsed ICAO's accessibility priority for the next triennium, as part of the broader social sustainability agenda.

#### Improving assistance service

Passengers with disabilities may not be aware of the different types and levels of accommodations and services that airlines and airports offer and provide. This is being addressed through the launch of an SSR working group with the aim to improve our service, educate travel agents and airports on the service differentiations and finally empower the passenger to the service they require. Furthermore, communicating the assistance services available in language that is easy to understand and lets the passenger decide the assistance according to their needs is key.

### • Join the UNWTO Action Agenda 2030

With a market of 1.3 billion people with significant disability in 2023, and 1 in 6 persons expected to reach the age of 65 by 2050, accessible tourism is a game changer for aviation and destination management organizations.

IATA will support the UNWTO to deploy the <u>Action Agenda 2030</u> for disability inclusion and tourism's contribution to the Sustainable Development Goals. The agenda includes measures to advance training, develop measurement systems and increase industry awareness of the advantages of a diverse workplace.