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 one billion people live with some form of disability, which constitutes approximately 15% of the world's population. 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 Resolution on Passengers with Disabilities.

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
Over the past years, states have shown a clear and positive interest in advancing accessibility for passengers with a disability. However, existing regulations are 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.

The current fragmentation of national regulation and procedures does not help the industry to consolidate policies and processes and leaves room for interpretation by the experts in charge of the work.

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 one same 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 or autism. 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. This includes communication of information prior to
travel and at the airport; awareness raising regarding the importance of "pre-notification"; assistance at the airport for areas that are the responsibility of the airline; direct assistance onboard the aircraft; and assistance during flight disruptions.

**Mobility Aids**

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

To face these issues, in 2021, IATA launched a global Mobility Aids Action Group (MAAG) to examine and improve the transport journey of mobility aids, including wheelchairs, with the objective of improving the handling of this vital equipment for travelers with disabilities. Uniquely, the MAAG brings together the full range of stakeholders involved in this area, including accessibility organizations (representing travelers with disabilities), airlines, ground service providers, airports, and mobility aids manufacturers.

At the root of the challenges airlines face 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.

The MAAG identified several issues that work against airlines' 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 who must perform the 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 the mobility aids from the airport to the ramp and this operation often happens manually, at detriment to the safe handling of the mobility aid.
- The design of many mobility aids and the design of the aircraft cargo compartment on the types of single aisle and regional aircraft typically used in domestic service 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, the MAAG published new guidance material, 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

**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 not necessarily restricted to specific routes but 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 need support to navigate potentially busy and confusing airports (e.g., elderly passengers who do not feel confident navigating their way through a busy airport on their own or people who simply need directional assistance as they find large airports daunting).

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

At present there is no regulation that 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 support passengers with disabilities and those passengers who request a wheelchair to navigate potentially busy and confusing airports. Such assistance should be proportionate to need while allowing persons with disabilities and persons with reduced mobility to move at the airport with the peace of mind to take their flight on time.

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 the assistance in such a way that the person concerned is able to take the flight for which they hold a reservation 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, especially during summer or other high-demand periods or resource challenges. 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.

**Airport Accessibility and Universal Design**

In response to the critical importance of ensuring accessibility at airports, IATA and Airports Council International have reviewed key elements of the planning and design of infrastructure for existing and future airports. The objective is to integrate the principles of inclusive design into airport planning and development and incentivize airports to be better and more disability inclusive. Findings and recommendations are now incorporated in a dedicated chapter of IATA’s Airport Development Reference Manual (ADRM) and serve as encouragement to airports to make Diversity and Inclusion part of their development strategies.

**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 sustainable agenda.**
  IATA will continue engaging with regulatory agencies, with international organizations, stakeholders, and representatives of the disability community to advance air transport accessibility and disability inclusion altogether. Throughout this engagement, the goal is to be pragmatic and ensure that the development of accessibility regulations and practices deliver ‘one step at the time’ clearly defined, measurable policy objectives to provide a safe and positive travel experience not only to the disability community but 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. Focus will be given to improve assistance service codes 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 plain language that is easy to understand and lets the passenger decide the assistance according to their needs is key.

- **Assistance Dogs**

IATA supports the right of individuals with disabilities who have a legitimate need to travel with a trained and certified assistance dog to do so. Unfortunately, regulations define assistance and service dog very broadly, leaving space for interpretation and the potential to create disruption 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 airlines are left to determine if the documentation provided is sufficient to satisfy themselves that the animal is a legitimate service animal trained to work in a public setting.

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).

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.

IATA will work with its membership and relevant stakeholders to issue policy guidance with the aim to foster clarity and certainty.