

Irish Wheelchair Association

Submission

on the implementation and compliance with Article 8 of regulation (EC) No. 1107/ 2006 as set out in Commission for Aviation Regulation Notice.

IWA makes this submission in regard to the Commission for Aviation Regulation published notice on the 8 December, CN5/2008, outlining its position as designated National Enforcement Body (NEB) on whether the proposed PRM charge at Dublin airport satisfies the criteria set out in Article 8 of EC Regulation 1107/2006 which concerns the rights of disabled persons and persons with reduced mobility when traveling by air.



Mission Statement

The Irish Wheelchair Association is a national organisation dedicated to the achievement of full social, economic and educational integration of people with disability as equal, independent and participative members of the community.

Implementation of Quality Standards

The implementation of Regulation EC 1107/ 2006 was a significant landmark in air travel for people with disabilities. It gave disabled people for the first time the right to experience safe, equitable and dignified access to services and facilities in relation to air travel. Importantly, the new quality standards will ensure that disabled passengers will receive services in just the same way as other passengers who are not disabled. It is within this context that the IWA will set out its matters in regard to the PRM levy for consideration prior to the Commission issuing any binding direction. IWA considers the PRM levy a critical component in implementing the quality standards.

In the short space of time that the new standards have been in place, disabled passengers have experienced a considerable overall improvement across a broad spectrum of facilities and services. IWA, through its lifestyle magazine informed its 20,000 membership of the new standards and what they can expect from airport authorities and airline carriers.

As an advocacy organisation we have received very large amount of positive feedback in relation to the provision of:-

- Professional, reliable assistance through the appointed One Complete Solution Ltd (OCS).
- Assistance through all stages of a journey including; being met in a car park, assistance through the airport, assistance with embarkation and disembarkation from an aircraft.
- Accessible areas in set down and departures
- Accessible car parking spaces in both long term and short term stay car parks, which are linked to car park control by an intercom system.

- Dedicated car park areas that meet the recommended width to accommodate motorists with disabilities.
- Accessible features in the terminal building in relation to adapted facilities, accessible information desk and general ease of movement and access for all customers.

These features ensure that a person with a disability can complete their intended journey in and around the terminal building. However, the most significant impact of the quality standards has been in relation to physical transfers of people with disabilities. **The boarding and disembarkation of disabled passengers by either an Air Bridge or ambulifts now meets best practice.** This set standard now up holds the person's right to a safe and equitable service. IWA in its submission to the DAA outlined the unsafe and undignified practices that were being implemented prior to the legislation (reference IWA submission on www.iwa.ie). Anecdotal feedback from IWA members, has highlighted in particular that the availability and use of ambulifts has positively impacted on their flying experience.

These quality standards have been implemented by the airline industry in order to meet the rights of people with disabilities as stipulated in EC regulation 1107/2006. As is common practice across Europe, the PRM levy funds these quality standards. It is a cost not borne by the operator but by all passengers. The implementation and funding of these quality standards are paramount to meeting the air industry's legal obligation to uphold EC regulation 1107/2006.

Consultation process

IWA actively engaged in the open invitation to participate in all stages of the consultation process, including open feedback sessions with DAA, airline carriers and interested parties.

We commend the managing bodies of Dublin, Cork and Shannon airports in their communications and progress in meeting their legal responsibility for the provision of assistance services for people with disabled people when travelling by air.

IWA feels the consultation process was constructive and effective in enabling the expert's voice to be heard; that is the voice of the disabled passenger. IWA members felt assured that their issues and concerns in relation to air travel were enacted on and in evidence in the newly established quality standards.

IWA detailed submission on the issues in relation to air travel and services can be viewed on www.iwa.ie.

Disability User Group Representation

IWA as an advocacy organisation for people with limited mobility has representation on the DAA and other airport authorities Disability User Groups which have been established in line with the Governments Transport Sectoral Plans. The Disabled User Groups are made up of representatives from a broad range of organisations representing people with specific requirements. As outlined in our submission we would recommend that the Commission in its capacity of NEB would consult with the Disability User groups in relation to issues of compliance and non compliance with the regulation.

Conclusion

We have just got to a point where people are experiencing for the first time quality standards in relation to air travel. These standards are not a luxury they are basic travel standards that give people with disabilities safe and equitable air travel. Active enforcement of legislation that promotes the rights of disabled passengers can be the only way forward in issuing a binding direction on the issue of PRM charges. Therefore:-

IWA calls on

- The Commission, in issuing any binding direction, to ensure that the rights of the disabled persons and persons with reduced mobility when travelling by air will be enforced.
- The Commission, in issuing any binding direction, to ensure that all parties uphold their legal responsibility to provide assistance that meets the established quality standards.
- The Commission to assure disabled passengers that the issuing of any binding direction will not see the established quality standards undermined, suspended or reneged on.
- The Commission, in issuing any binding direction, to ensure that the use of ambiliifts remain as standard practice in line with the quality standards.
- The Commission's in its role as NEB, with its particular powers of enforcement in relation to compliance or non compliance with the regulation, to quantify the level of service being received on ground level by passengers with disabilities to fully inform the decision making processes.
- The Commission to link and consult with Disability User Groups so all views are represented.

Irish Wheelchair Association wishes the Commission every success with the consultation process. IWA representatives are available to meet with you to discuss this submission and any other issues in relation to air travel.

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