



Rights Delayed: Air Travel for Passengers with Disabilities

European Human Rights Report
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Author: Daniel Casas

Guest author: Francesca Lo Castro (Chapter 4)

Editors: Alejandro Moledo, Marie Denninghaus, André Felix and
Natalia Suárez

Proofreader: Sergio Marín Zapata

Designed by: Rodoula Nikolaou - accesseu.net

Easy-to-Read version by: Lila Sylviti - Say it Easy

With thanks for support on dissemination materials: MD Nizamuddin



The European Disability Forum
7-8 Avenue des Arts 1210
Brussels – Belgium

info@edf-feph.org

www.edf-feph.org



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Foreword



Apostolos Tzitzikostas

Commissioner for Sustainable
Transport and Tourism

Everyone in the European Union must be able to enjoy their rights, including the right to move freely.

Our transport systems must make it easy for everyone to access essential services, including air travel, in a fair and inclusive way.

The Human Rights Report by the European Disability Forum helps us move in that direction. It shares the real-life experiences of people with disabilities and highlights the barriers they still face when flying. It also includes feedback from national authorities and looks at how accessible airline and airport websites are.

While the EU has made progress since introducing rules on air travel for people with disabilities, this report shows that more must be done.

Listening to people with disabilities is key for shaping policies that enable truly inclusive travel.

This message is especially important ahead of the European Mobility Week 2025, with its powerful theme: 'Inclusive Mobility for All'. It reminds us that transport must be accessible, not just sustainable.

Thank you to everyone who contributed to this important work and continues to push for transport systems that work for every citizen.



Yannis Vardakastanis
EDF President

The principle of Freedom of movement has been one of the greatest milestones of the European Union (EU). Unfortunately, not everyone can study, work, travel or live in another EU country. The lack of accessibility, especially in transport, is a big barrier to the freedom of movement of 100 million people with disabilities in Europe. Transport is not a luxury we can just live without; it is a basic service that makes us an active member of society and determines our access to the most basic rights, including education and employment. With the passenger rights framework, the EU has taken important steps to guarantee our right to transport. However, much more can be done, especially in air transport. Despite the existence of EU legislation, we are still discriminated by inaccessible planes and airports, unclear safety rules, lack of recognition of our assistance dogs, limited compensation for mishandled wheelchairs or inadequate assistance.

We hope that this Human Rights Report provides evidence to improve existing rules and, more importantly, raises awareness on the many barriers that continue to exclude us from exercising our rights to freedom of movement.

The lack of accessible transport systems obliges us to notify in advance each time we want to travel, to liaise at length with transport companies to travel with our mobility equipment and assistance dogs, to plan carefully each step of the itinerary and to incur higher costs. Most passengers have the certainty that, unless something exceptional occurs, they will complete their journey without any problem. Those with disabilities know that completing the journey without any problem can be exceptional.

We hope that this edition of the Human Rights Report paves the way for a more inclusive and accessible travel experience. As our motto says: “Nothing about us without us”. The disability movement stands ready to support public authorities, airports and airlines in this process.

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Executive Summary

Equal access to transport is an essential right that determines the degree to which persons with disabilities can fully participate in society, including in employment, education and leisure, to name a few.

This is a right protected by the United Nations Convention on the Rights of Persons with Disabilities (CRPD), ratified by the European Union (EU) and all its Member States.

As the world becomes more interconnected, air transport is one of the main options to travel internationally and between EU countries. Air transport is also necessary transport mode for persons living in islands or isolated areas.

Although the European Union adopted Regulation 1107/2006 to improve access to air transport for passengers with disabilities, these still face many barriers and discrimination.

Lack of equal access

67%

of the respondents to EDF online survey consider that they do not have equal access to air transport.

The survey was responded by 251 participants.

Among them:

97.2% were persons with a disability.

2.4% were relatives of persons with disability.

0.4% preferred not to disclose the information.

Potential infringements of the law by airlines and airports

Some airlines analysed by the report could potentially breach their obligations under EU law. Some practices include:

- Application of extended prenotification requirements for assistance provision (Luxair, Bulgaria Air, KM Malta).
- Application of extended prenotification requirements to travel with assistance dog in specific routes (KLM, Air France and Iberia).
- Denial of the right to travel with an assistance dog in specific routes (EasyJet, Ryanair and LOT).
- Denial of the right to travel with an assistance dog (Braathens).
- Request of medical certificates/forms for certain disabilities (Bulgaria Air, KM Malta and Sky Express).
- Charge of a fee for the provision of assistance (KM Malta).

Additionally, some airports do not cooperate with National Disability Councils¹:

Lisbon (Portugal)

Porto (Portugal)

Eindhoven (Netherlands)

Valletta (Malta)

Luxembourg (Luxembourg)

Budapest (Hungary)

Heraklion (Greece)

Charleroi (Belgium)

Bucharest (Romania)

Ljubljana (Slovenia)

Cluj-Napoca Romania)

Tallin (Estonia)

Sofia (Bulgaria)

¹ Some of these airports could cooperate with local organisations of persons with disabilities, but the authors of the report could not find this information.

Inconsistent implementation of the law by airlines

Due to the gaps of applicable legislation, airlines apply its provisions differently. Notable differences include the transparency of information, the number of passengers with disabilities allowed on board, the criteria to impose an accompanying person, the restrictions for the transport of mobility equipment, the training certificates of assistance dogs and the availability of on-board wheelchair.

Out of the 30 EU airlines reviewed:

20 airlines do not publish their criteria to determine the limit on the number of passengers with disability and reduced mobility allowed on board.

Among the 10 airlines that publish the limits, differences exist. While some limit them to around 50% of passengers (Luxair, Iberia, Aegean, EasyJet and ITA Airways) others limit it to 10% of passengers (Vueling). Other airlines set specific limits for wheelchair users: 2 passengers (Ryanair and TAROM) and 3 passengers (TAP) in a Boeing 737.

9 airlines apply comfort considerations² to determine if a person must travel accompanied

These airlines are: Ryanair, Iberia, SAS, TAROM, Croatia Airlines, Austrian, Vueling, LOT, Transavia. Only 10 airlines adhere strictly the self-reliance criteria: KLM, Lufthansa, Eurowings, Luxair, Aer Lingus, TAP, Easy Jet, ITA Airways, Air Baltic, Finnair.

² For example, ability to eat or use toilet independently.

12 airlines do not publish the information on the weight and size restrictions applicable to mobility equipment.

Among the 18 airlines that publish this information there are significant differences, even when using the same aircraft model.

4 airlines require international training accreditation, which cannot be provided by many assistance dog handlers.

These airlines are: KM Malta, Ryanair, Aer Lingus, Brussels Airlines.

3 airlines confirm the lack of provision of cabin wheelchair.

These airlines are: Luxair, TAROM and Vueling. Only 17 airlines indicate the availability of cabin wheelchairs on their planes (either by default, on demand or in some routes) while 10 airlines do not provide any information.

Inconsistent implementation of the law by airports

Differences include the type of cooperation with organisations of persons with disabilities and the publication of Service Quality Standards on their website. Out of the 38 airports reviewed:

12 airports have not published the Service Quality Standards on their websites.

Different enforcement regimes at the national level

National Enforcement Bodies (NEBs) differ in the nature of their decisions, the level of applicable fines, the cooperation with organisations of persons with disabilities and the staff devoted to enforcement of Regulation 1107/2006.

Out of the 27 NEBs reviewed:



Only 14 can make **binding decisions**



Applicable fines for non-compliance range from EUR 860 (Lithuania) to EUR 4,500,000 (Spain)



Only 13 **cooperate** with organisations of persons with disabilities



Staff devoted specifically to enforcement of Regulation

1107/2006 ranges from 1 person (Finland, Denmark, Estonia, Luxembourg, Romania, Slovenia and Slovakia) to 5 (Spain and Italy)



Only 1 **provides information**

on equality bodies as an alternative redress venue (Austria)

Low passenger awareness on existing rights

The findings of the report also suggest limited passenger awareness on existing rights:

43% of passengers surveyed by EDF claimed not knowing about Regulation 1107/2006.

11 airlines (out of 30) and **8 airports** (out of 38) reviewed do not refer to Regulation 1107/2006 on their website.

25 airlines (out of 30) and **16 airports** (out of 38) reviewed do not inform passengers about the existence of National Enforcement Bodies.

Lack of digital accessibility

Automatic accessibility checks of airlines and national enforcement bodies' websites suggest that there are still digital barriers for passengers with disabilities.

Barriers not yet addressed by EU legislation

Many barriers experienced by passengers with disabilities are not regulated at the European level, including accessibility of airplanes, length and complexity of procedures to travel with mobility equipment and assistance dogs and cost of the journey.

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Introduction

The 9th European Disability Forum's Human Rights Report focuses on the rights of persons with disabilities to access transportation on equal basis with others, as required by article 9 of the UN Convention on the Rights of Persons with Disabilities (CRPD).

The report explores the practical barriers that prevent persons with disabilities from travelling by plane and examines the impact of applicable EU legislation. More specifically, the report looks at how Member States, airlines and airports have implemented Regulation 1107/2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air.

Despite the ratification of the CRPD by the EU and all its Member States and the adoption of specific legislation to ensure that passengers with disabilities have the right to free movement, freedom of choice and non-discrimination, there are still many barriers to air travel.

Following the European Commission proposals in 2023, passenger regulations are being revised by European Parliament and the Council of the EU. Our goal is to raise awareness on existing barriers and legal gaps to bring relevant EU legislation in line with the CRPD.

Our 9th Human Rights Report has the following objectives:

Explain the barriers that passengers with disabilities face in air travel



Explain the key obligations under Regulation 1107/2006 and highlight the main gaps



Collect up-to-date information on the implementation of Regulation 1107/2006 by EU Airlines, Airports and National Enforcement Bodies (NEBs)



Highlight good practices that have improved access to air transport



Provide recommendations to EU policy makers, Member States, airlines and airports to improve access to air transport for passengers with disabilities

This Human Rights report is structured as follows:

Chapter 1 contextualises the importance of air transport in the EU and explains the barriers that passengers with disabilities face. This chapter includes the personal experiences of passengers with disabilities to better understand the implications of lack of equal access.

Chapter 2 describes Regulation 1107/2006, the legal framework analysed in this report. After going through its main provision, this chapter highlights the existing gaps and explains how they can discriminate against passengers with disabilities.


Chapter 3 looks at how EU airlines, airports have implemented specific provisions of Regulation 1107/2006. This chapter also identifies practices that could be a potential infringement of EU law.


Chapter 4 compares how Member States monitor and enforce Regulation 1107/2006. That is, how they make sure that airlines and airports do what is required by law and support passengers with their complaints.

Chapter 5 presents good practices from different parts of the world.

Chapter 6 offers our recommendations for EU Policy makers, EU Member States, National Enforcement Bodies, airlines, airports and intermediaries.

 [Annex I](#) explains the methodology of the report.

 [Annex II](#) contains the data that has been gathered for chapters 3 and 4.

 [Annex III](#) is common to each issue of EDF Human Rights Report. In it, we outline general progress on the CRPD in Europe and highlight which European countries are failing to meet their basic obligations.

For this report, we conducted extensive research. If you would like more detailed information on specific airports, air carriers, or NEBs, fact sheets are available upon request. Please contact us.

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Glossary

A Accessibility:
characteristics, elements and functionalities of products, devices, services systems and environments that ensure equal access to persons with disabilities, including those using assistive devices.

Air Operations Certificate (AOC):

a certificate that allows an airline to perform commercial air transport. Any airline in Europe that wishes to operate must have the approval to do so through the AOC. The AOC is delivered by the Civil Aviation Authority¹.

Assistance dog:

a dog that has been specifically trained to assist persons with disabilities or reduced mobility in carrying out specific tasks, increasing their autonomy and safety.

Alternative Dispute Resolution Body (ADR):

ADRs are an out-of-court mechanism that allow consumers to resolve disputes thanks to the intervention of an impartial third party (the ADR body). Compared to court procedures, it is an easy, fair and cost-effective mechanism to enforce consumer rights, including passenger rights.

B Binding decision:
a decision that must be obeyed. If it is final, then in general it cannot be challenged in Court.

C Civil Aviation Authority:
public body responsible for regulating and overseeing civil aviation within a specific country. Some tasks of a

¹ European Union Aviation Safety Agency (EASA), Air Operator Certificate, Retrieved 23 April 2025, <https://www.easa.europa.eu/en/domains/air-operations/air-operator-certificate-aoc>

Civil Aviation Authority can include the licensing of pilots, approval of air carrier operating certificate and monitoring the implementation EU legislation, including passenger rights.

Court:

the place where legal disputes are heard and resolved by judges. The European Union and its Member States have their own courts, which deal with different types of cases.

D

Directive:

type of EU law that sets minimum requirements that Member States must 'transpose' into national law. The Directive 2018/882 on minimum accessibility requirements for products and services (European Accessibility Act) is an example of this.

Discrimination:

any distinction, exclusion or restriction based on one or several grounds (gender, race, disability, sexual orientation, etc.) that damages or nullifies the recognition, enjoyment or exercise, on equal basis with others, of human rights and fundamental freedoms in the political, social, cultural civil or any other field.

E

Enforcement:

process of detecting, deterring, redressing and punishing the breach of a certain law.

EU Air Carrier:

company that offers air transport services and holds a license issued by the relevant authority of an EU Member State. This license allows them to provide such transport services.

European Commission:

the EU's politically independent executive arm. Its core responsibilities include proposing EU laws and policies and monitoring their implementation.

I Intermediaries:

term that refers to tour operators, travel agencies or booking platforms that, among many other things, sell plane tickets to passengers. This can include online platforms such as Kiwi, Expedia or eDreams.

I Interpretative Guidelines:

European Commission's interpretation of a certain law in order to clarify some of its provisions and promote best practices of application. They do not create any new obligation, are not binding and do not affect the interpretation provided by the European Court of Justice. The 2024 European Commission interpretative guidelines on Regulation 1107/2006 are an example of this.

N National Disability Council:

organisation that represents at the national level persons with disabilities. In many instances, National Disability Councils are umbrella organisations with a membership that include different organisations of persons with disabilities.

O Organisations of persons with disabilities:

organisations comprising a majority of persons with disabilities who represent the interests and defend the human rights of persons with disabilities through self-representation and advocacy.

P Persons with reduced mobility (PRM):

according to Regulation 1107/2006, PRM is a category of passengers whose mobility when using transport is reduced due to any physical disability (sensory or locomotor, permanent or temporary), intellectual disability or impairment, or any other cause of disability, or age, and whose situation needs appropriate attention and the adaptation to his or her particular needs of the service made available to all passengers.

Persons with disabilities:

persons who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.

R Redress:

the process of correcting a situation in which the rights of a person have been breached. The redress process often leads to remedies. Remedies are the decision of the enforcement body aimed at compensating the person or organisation who suffered the damage. Remedies can take many forms: financial compensation, a penalty, an obligation to stop a specific behaviour or to act in a certain way.

Regulation:

type of EU law that is directly applicable in all member states, such as the Regulation 1107/2006 on the rights of disabled persons and persons with reduced mobility when traveling by air.

W WCHC:

code used in air transport to indicate the type of assistance that a passenger requires. In this case, WCHC code refers to passengers who cannot walk, rely on a wheelchair for mobility and require assistance to move board and move inside the cabin.

Abbreviations

UN CRPD: UN Convention on the rights of persons with disabilities

ECAC: European Civil Aviation Conference

EU: European Union

IATA: International Air Transport Association

NEB: National Enforcement Body

PRM: person with reduced mobility

ACAA: Air Carriers Access Act (United States)

DOT: Department of Transportation (United States)

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Chapter 1:

Air travel and disability



Air travel

The importance of air passenger transport is growing. Except during the COVID pandemic, the number of people traveling by air in the EU has constantly increased over the years, reaching **973 million passengers** in 2023.¹

While the total number of passengers is still behind those of other transport modes (rail transported 8 billion passengers the same year)², air transport continues to be essential to travel to other EU countries and to the rest of the world.

For instance, out of the total amount of passengers transported by air in 2023:



49% travelled outside of the EU



35.9% between EU countries



15% did it nationally³.

For people living in islands or isolated parts of the EU, air transport is often the only available option to travel to another country.

Of all the passengers transported by air, we do not know how many of them are passengers with disability or reduced mobility. While some estimates indicate that around **0.6%**⁴ (2018) of air passengers requested some type of assistance, it is difficult to have an accurate picture, as not all persons with disabilities request or require assistance services.

- 1 Eurostat, Number of air passengers up almost a quarter in 2023. Retrieved 3 February 2025 <https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20241206-1>
- 2 Eurostat, Rail passenger transport reaches a new peak in 2023. Retrieved 3 February 2025: <https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20241030-1>
- 3 Eurostat, Air passenger transport statistics, Retrieved 3 February 2025 https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Air_passenger_transport_statistics
- 4 Based on the data available on Table F.9 regarding the variance in passengers requesting assistance by dataset (2018) at European Commission and Steer's 2021 Study on the EU Regulatory Framework for Passenger Rights. Part A, Evaluation of Regulation (EC) No 1107/2006 on the rights of persons with disabilities and with reduced mobility when travelling by air. <https://op.europa.eu/en/publication-detail/-/publication/d8b8bd04-1b4d-11ec-b4fe-01aa75ed71a1/language-en>

Considering that around **87 million people in the EU have some form of disability** (around 19% of the population)⁵ and that there are still many barriers to air transport, this data⁶ could indicate that passengers with disabilities travel less by air than passengers without disabilities.

This assumption would be consistent with existing research on transport poverty, which acknowledges that the lack of affordable, available and accessible transport services marginalises persons with disabilities.⁷ Other research in the field of transport also suggests that passengers with disabilities make fewer journeys, travel shorter distances and use a more limited number of transport modes.⁸

This reality not only affects persons with disabilities. The lack of accessibility in transport systems also impacts an ageing population that will increase in the years to come.

According to Eurostat:



People over 65 are projected to increase from:

21.8% (98 million)
of the total EU
population in 2025



28.9% (129 million)
by 2050.⁹

- 5 European Commission, Persons with disabilities. Retrieved the 9th July 2025, https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/disability/persons-disabilities_en
- 6 Due to the lack of disaggregated and comparative census data we can only provide estimates. Some EU countries do not ask about disability in their census, and among those who do, there are different questions and ways of establishing disabilities.
- 7 European Commission: Directorate-General for Employment, Social Affairs and Inclusion, Cludius, J., Noka, V., Unger, N., Delfosse, L. et al., Transport poverty – Definitions, indicators, determinants, and mitigation strategies – Final report, Publications Office of the European Union, 2024, <https://data.europa.eu/doi/10.2767/0662480>
- 8 Devajyoti, D. (2014) The role of household members in transporting adults with disabilities in the United States, Transportation Research Part A: Policy and Practice, Volume 69, page 45 – 47. <https://www.sciencedirect.com/science/article/abs/pii/S0965856414001906>
- 9 Eurostat, Population Projections at national level 2022 – 2100, retrieved the 4th July 2025 https://ec.europa.eu/eurostat/databrowser/view/PROJ_23NP__custom_17347402/default/table?lang=en

Passengers with disabilities

Most of the information about the experiences of persons with disabilities when traveling by air comes from individual stories and reports, as there is currently no requirement for air carriers, airports and public authorities to report on the assistance provided to passengers with disabilities and the complaints received.¹⁰

EDF conducted an online survey between October 2024 and February 2025 in order to get a better understanding of the experience of passengers with disabilities in air travel.

The survey was answered by **251 people from 36 different countries**. Although a bigger and more representative sample is needed to draw more accurate conclusions, the answers received have been a valuable source of information for this report, particularly due to their demographic variety.

97.2% of the respondents identified themselves as having a disability, **2.4%** were relatives of persons with disabilities and **0.4%** preferred not to disclose this information.

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10 The European Commission proposed to introduced such requirements in the 2023 Proposal on Enforcement of Passenger Rights - <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52023PC0753>. The proposal needs to be adopted by the European Parliament and Council of the EU to become law.

Lack of equal access to air transport

67% of the respondents to the survey considered that they do not have equal access to air transport.

The lack of equal access is perceived higher by passengers with:

- Multiple disabilities **79%**
- Developmental disabilities **75%**
- Physical disabilities **70%**
- Visual disabilities **68%**
- Hearing disabilities **62%**

The perception is also high for passengers with

- Intellectual disabilities **57%**
- Pain and chronic disabilities **50%**
- Psychosocial disabilities **50%**

The existence of numerous barriers is the reason why so many passengers with disabilities still do not enjoy their right to equal access to transport.

“If I have the choice, I prefer to travel by train or private car over plane, even if the journey takes longer. Despite having certain rights as a passenger, there are still so many physical barriers: I can’t travel on my wheelchair, I need to spend lots of time liaising with air carriers to make sure they allow the wheelchair on board, I have to sit for hours on uncomfortable seats, I can’t use the bathroom on board and I need to buy an extra ticket for my personal assistant. Most of these barriers do not exist in other transport modes”

Passenger with a physical disability (Germany) 

Barriers when travelling by air

Travelling by air is a complex process that involves several steps and requires a lot of preparatory time. This is even worse for passengers with disabilities. Let's take some examples from a common journey:

- While passengers need to do some research to book their ticket at a suitable date and price, persons with disabilities **need to find and understand the specific conditions and procedures** that apply to their transport. For example, they need to find if their wheelchair can be accepted in a specific flight or if they have all the necessary documents to travel with it.
- When this information is not provided on the website, they need to **contact the airline** either via phone or e-mail to get all the relevant details.
- When the booking website is not accessible, they **need to ask another person to book the ticket** and request assistance on their behalf.
- Once the booking is done, some passengers **need to wait for the confirmation** that they travel has been accepted. If necessary, they need to **provide extra documentation**.
- If they are not accepted, they need to look for an **alternative flight** and, as time passes, tickets get more expensive.
- The day of the trip, some passengers need to **make sure that** there is **accessible transport to the airport**. Otherwise, they need to book an accessible taxi in advance.
- At the airport, some passengers need to **arrive early enough to check-in** the mobility devices and receive the assistance they had requested. If the check-in staff does not know the procedures, the check-in can take longer than expected. Despite making the request in advance, assistance can be delayed which puts the passenger at risk of missing the flight.
- While waiting for the flight, passengers **might miss important travel information**, such as delays or gate changes, if the

communication systems only convey information using one sensory channel.

- During the flight, some passengers **will not be able to use the toilet** because it is not accessible to them.
- At landing, passengers might have to **wait extra time to receive assistance** or to retrieve the checked-in mobility equipment.
- If the **mobility equipment is badly damaged**, the passenger cannot continue the journey as expected and has to start a long process to get it repaired.

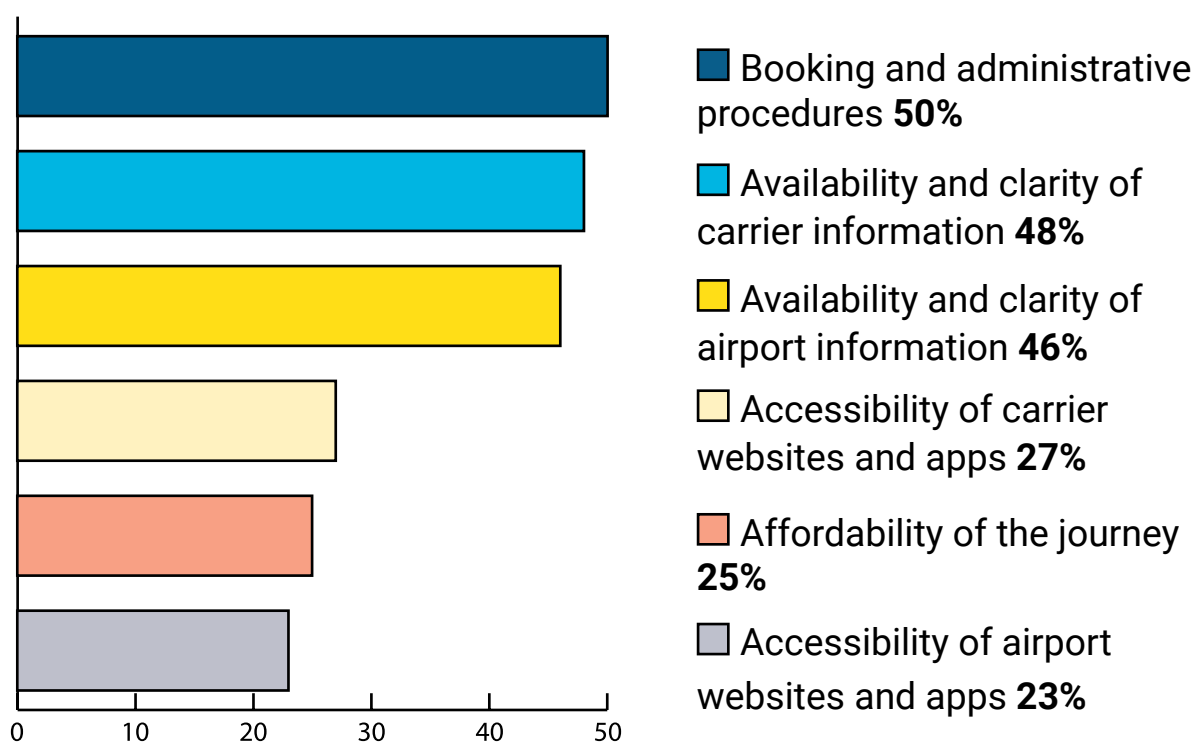
According to our survey, only a small proportion of respondents considered not facing any barrier when planning the journey (**14%**) and during the journey (**12%**). The rest of the respondents reported facing some type of barrier.

"We have to book assistance in advance, we cannot do the check-in online and we have to be at the airport way in advance for the assistance and the check-in (it sometimes takes 30 minutes to check-in with a wheelchair due to attendants not knowing the process and due to issues with batteries). Most of the times we cannot choose the seats that work better for our needs as most companies assign seats for people with disabilities, be it the aisle or the window, depending on the company. Also, and most important, we cannot travel with our wheelchairs on the cabin. After the landing, we have to wait for the assistance to come (I've sometimes waited for more than 1 hour) and we have to hope that our wheelchairs have not been damaged. If they have been damaged, it ruins our trip and we go through several months of hardships (paperwork, reduced mobility and independence, etc) until we can get our custom-made devices replaced."

Passenger with a physical disability (Spain) 

Barriers when planning the journey

According to the survey, the most common type of barriers when planning the journey are:



Booking and administrative procedures

Booking and assistance request procedures can be complicated, inaccessible and add an extra burden on passengers.

Airlines do not always allow passengers to request assistance during the online booking process, requiring them to do it at later stage. In some instances, the passenger can only use a phone number to request assistance, an option that can be inaccessible to passengers who are deaf, hard of hearing or have speech impairments.¹¹

Booking a ticket does not always guarantee the right to travel and specific approval by the carrier is often needed. For example, passengers traveling with a powered wheelchair or an assistance

11 For example, Luxair asks passengers traveling with assistance dogs to book the service by informing call Centre. See: <https://www.luxair.lu/en/information/travelling-animals>. Retrieved 8th July 2025.

dog have to liaise with the carrier to make sure they accept them on board. The airline can request additional documentation in the process, adding a new layer of complexity and effort. For example, some airlines require a medical or veterinary documentation that prove the need of the assistance dog.¹²

This process can take several days and be successful only with the perseverance of the passenger. If the passengers are not accepted for transport in a specific flight, they need to look for alternative ones as the prices increase.

“The airline refused to sell me a ticket because my wheelchair did not meet their requirements. I move around in an electric wheelchair. After correspondence all day, I was sold a ticket”.

Passenger with a physical disability (Ukraine) 

“When booking, I am asked detailed questions about my mobility equipment, most of which are not relevant. I am often asked personal questions about my health and medical situation even though this is completely irrelevant and intrusive. With some airlines it has been necessary to provide a certificate from my doctor that I am 'fit to fly'. It is not possible to reserve a seat in advance online because I am often told "this must be done at check-in for wheelchair users".

Passenger with a physical disability (Belgium) 

“I purchased a ticket and was approved to fly with an assistance dog. Afterwards, they cancelled the approval. Then they approved and cancelled again. I never know if I will lose money or will actually be able to fly.”

Passenger with a chronic condition (Lithuania) 

12 See examples in Chapter 3 on Carriage of Recognised Assistance Dog.

Availability and clarity of information

Passengers with disabilities need more than just the basic details of the journey. Among others, they need to know the place to meet assistance at the airport, the availability of accessible toilets and cabin wheelchairs on board, the seating policies of the carrier, the arrangements to travel with an assistance dog and the potential limitations for the carriage of mobility equipment.

Unfortunately, this information is not always available. When it is, it can be difficult to find, inaccessible and incomplete. Even worse, the information often changes from carrier to carrier, obliging the passenger to check the carrier's terms and conditions each time they want to travel. This means that different conditions can apply in the same trip, if the passenger needs to transfer to a different airline.

As explained in chapter 3, 22 of the 30 airlines analysed for this report do not provide website information on the restrictions or the transport of mobility equipment and the passenger has to request it to take an informed decision. Among those that do, different size and weight requirements apply.

“The guidelines for transporting wheelchairs also vary greatly from airline to airline and from airport to airport. Often the information is hard to find and no one is available to speak to in person.”

Passenger with a physical disability (Germany) 

Affordability

Price is an important factor when choosing a flight. However, passengers with disabilities cannot always choose the most affordable option and have to bear additional costs to use the transport service.

Our survey found that some passengers with disabilities prefer direct flights in order to avoid the stress and uncertainty of transfers and that others have to buy an additional ticket for their personal assistant.

Not only this, the price of the journey also increases when passengers have to book an adapted taxi to reach the airport, stay in accessible hotels at destination or restrict their travel options to airlines with better assistance practices.

“When disembarking, I have to wait for the assistant and very often they are delayed for a long time (because of this, I was nervous whether I would make it to the transfer, and sometimes I lost the transfer). Therefore, I have to choose tickets with a longer transfer, which reduces my choice and makes the flight more difficult.”

Passenger with a physical disability (Poland) 

“Steps to planes make it difficult to embark flights. I am forced to choose more expensive airlines that rarely use steps.”

Passenger with a visual disability (Ireland) 

“The price is also a problem, because the accompanying person is usually not free, which means that I have pay double the price for a trip.”

Passenger with a physical disability (Germany) 

Accessibility of websites and apps

Most passengers use websites and mobile apps to arrange their flights. However, if these websites and apps are not accessible, passengers with disabilities cannot find and compare flights, access travel information, request assistance, proceed to payment and complete the check in.

For instance, 78% of blind and partially sighted respondents referred to lack of digital accessibility as an important barrier ahead of the journey.

In 2023, the United Kingdom Civil Aviation Authority (CAA) published a report on the accessibility of 11 Air Carriers' Website¹³. According to their findings, 5 of them did not meet the minimum accessibility requirements: Ryanair, Wizz Air, TUI, Jet2 and Logan Air.

As highlighted in the report, digital accessibility is not only about meeting minimum accessibility requirements¹⁴, but also making websites user-friendly and providing easy-to-understand information.

"Websites of air companies are not accessible for blind people, and I need help from another person to request the assistance and buy the ticket. This means that I have to give them my card number for the payment."

Passenger with a visual disability (Italy) 

13 UK Civil Aviation Authority (2023) – Airline Digital Accessibility Report. Retrieved the 17 February 2025, <https://www.caa.co.uk/publication/download/20632>

14 Web Content Accessibility Guidelines (WCAG) and EN 301 549 (European Standard on digital Accessibility)

Time to prepare the journey

Passengers with disabilities and reduced mobility spend more time to prepare for trips compared to other passengers. This includes completing additional steps to request assistance, discussing logistical arrangements with the carrier, booking adapted transport, preparing requested documentation or getting information about accessible routes to the airport. Despite planning carefully the journey, any unexpected barrier can put an end to their travel plans.

“Traveling requires a lot of advance arrangements, which in theory sounds like it would work out. In practice, they don't always work out.”

Passenger with multiple disabilities (Finland) 

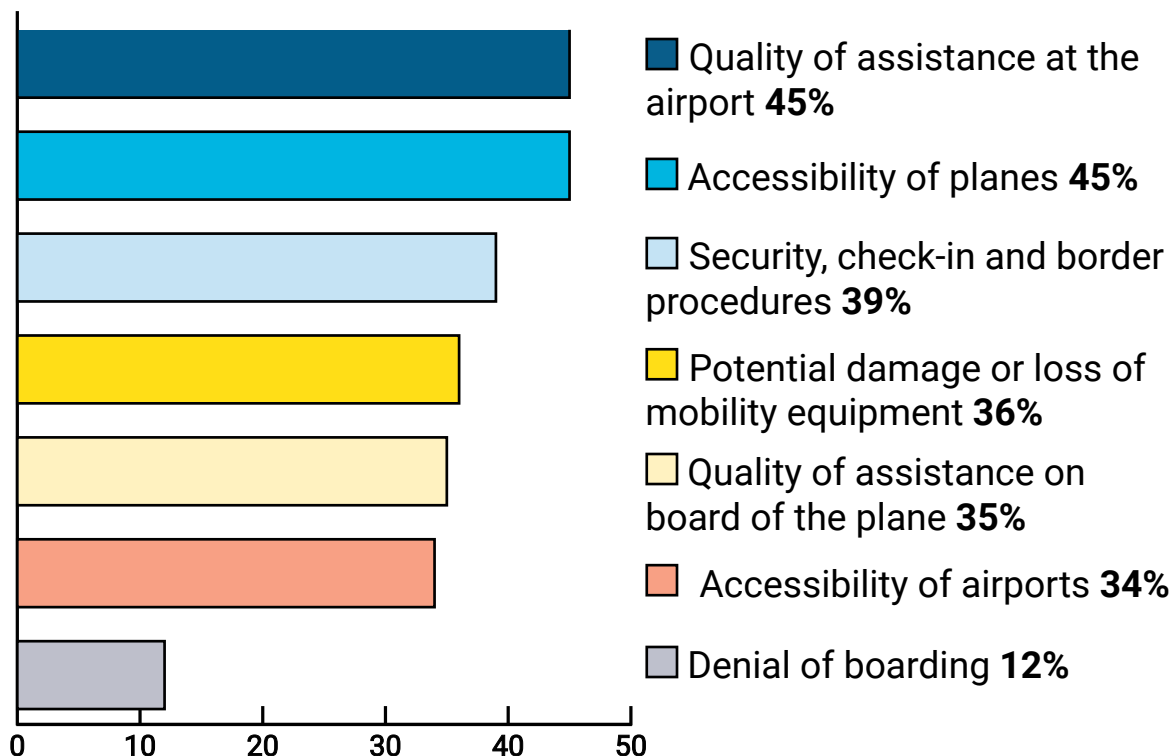
“Some time ago, I had to travel for work. I booked the travel tickets through the platform of a travel agency (train and flight) and informed them about my wheelchair and assistance requirements. Some days later, they confirmed that the airline had approved my wheelchair but not the train, suggesting a new itinerary. I decided to try to book the wheelchair for the train journey myself. This was easy to do. When I informed the travel agency that the rail company had accepted my wheelchair, they told me that the flight situation had now changed - the wheelchair was no longer accepted. After several weeks and many emails, I had to cancel the entire booking. We had to wait 3 months for the flight refund and lost 280 EUR for the train journey, which was not refundable.”

Passenger with a physical disability (Belgium) 

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Barriers during the journey

According to our survey, the most common type of barriers on the day of the journey are:



Other barriers mentioned in the survey are the difficulties linked to reaching the airport, the impact of travel disruptions, boarding processes and communication and information barriers.

Denial of boarding

Despite having a right to non-discrimination¹⁵, passengers with disabilities are still denied boarding or refused to sell a ticket based on their disability.

Carriers often base this decision on 'safety grounds' such as inability to evacuate in event of an emergency, not traveling with an assistant or an established limit of persons with disabilities per flight.

¹⁵ Under EU law, the right to non-discrimination is enshrined in Article 19 of the Treaty on the Functioning of the EU (TFEU), Article 21 and 26 of the EU Charter of Fundamental Rights and relevant secondary legislation, including Regulation 1107/2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air.

In some instances, the denial of boarding occurs indirectly because the carrier does not accept to transport their mobility equipment or assistance dog.

The seriousness of this situation is compounded by the fact that different carriers, and even different captains in the same carrier, apply different rules. Passengers have been refused boarding on their return flight, even if they have arrived to the destination in similar conditions, leaving them stranded and alone in an unfamiliar place.

"I was denied boarding on to a plane as I was the 5th person who booked assistance and this airline only allowed 4 people to book assistance! I was stranded and without compensation for staying another night and making my way to an airport 40 minutes away the next morning."

Passenger with a physical disability (Ireland) 

"I get refused with my assistance dog to many countries and by airlines while flying from EU to other countries especially with code share flights (they don't see my start and end destination as one travel) so they refuse me when I have to transfer."

Passenger with a physical disability (Netherlands) 

Accompanying person

Some passengers with disabilities who decide to travel alone are obliged to travel accompanied for safety reasons. In some instances, this is requested on short notice, right before boarding, and can lead to denied boarding. To make things worse, the passenger is required to bear the cost of the additional ticket.¹⁶

¹⁶ The European Commission proposed a provision to require airlines to provide the extra ticket free of charge in the 2023 Proposal on Enforcement of Passenger Rights - <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52023PC0753> The proposal needs to be adopted by the European Parliament and Council of the EU to become law.

For example, between 2008 and 2009, EasyJet denied boarding to three passengers with disabilities because they were traveling without an accompanying person. The affected passengers sued the airline and in 2012, the court found that there were no safety grounds to impose an accompanying person and obliged the airline to pay compensation for such a discriminatory practice.¹⁷

As explained in chapter 3, this practice is not clearly defined by law and practices diverge among airlines. Some require passengers to be accompanied if they are unable to eat or use toilet independently and others request it for passengers with specific disabilities, especially deaf or blind passengers. Other airlines do not require an accompanying person in these situations, as they are not related to safety.

Damage or loss of mobility equipment

Mobility equipment – including wheelchairs, walkers or crutches – are essential equipment for persons with disabilities and reduced mobility to move independently and safely. They can also be expensive¹⁸ and made-to-measure items that are difficult to replace.

Due to the current design of planes, air carriers usually place large mobility equipment in the aircraft hold, increasing the likelihood of it being damaged or lost during the journey. When this happens, passengers are severely affected, not only due to the cost of repair and replacement and the limited compensation they receive, but also the immediate impact on their independence, mobility, comfort and health. We must not forget about the time and effort required to solve the situation and the impact it can have in the professional and personal life.

17 EasyJet, condamnée pour discrimination envers des passagers handicapés, Le Monde (2012). Retrieved the 14 May 2025 on: https://www.lemonde.fr/societe/article/2012/01/13/easyjet-condamnee-pour-discrimination-envers-des-passagers-handicapes_1629452_3224.html

18 An electric wheelchair can cost up to EUR 10,000.

Although there is not data for the EU due to the absence of reporting obligations for air carriers, it is possible to have a picture of the United States (US). According to their Department of Transportation (DoT) carriers operating in the US mishandled 10.548 wheelchairs in 2019 alone.¹⁹

"My wheelchair has often been damaged during the flight. I would estimate at least three times out of every 10 flights there is some kind of damage, despite the fact that I make sure to fold it as much as possible, attach labels with the word 'FRAGILE' and provide guidance to the staff on how to transport and lift it. I have almost given up sending complaint letters to airlines because the standard response shows complete lack of interest. I have received compensation for serious damage to the wheelchair but even this has never been the full amount required for the repair, and it took many months to be sent."

Frequent flyer with a physical disability (Belgium) 

"I am always afraid that my wheelchair will get damaged in transit. If it does, then it is a major problem to try and get it repaired while abroad. I have a new electric wheelchair, and I would not consider bringing it with me when flying"

Passenger with a physical disability (Ireland) 

19 US Department of Transportation, Air Travel Consumer Report (2020). Retrieved on 17 February 2025, <https://www.transportation.gov/sites/dot.gov/files/2020-02/February%202020%20ATCR.pdf>

Accessibility of planes

The lack of airplane accessibility arose as an important barrier for passengers with disabilities, especially for those with a physical disability. Planes often lack minimum accessibility features, including accessible restrooms, information about emergency evacuation in alternative formats, entertainment systems and seats as well as cabin wheelchairs²⁰.

Plane accessibility directly impacts the passengers' decision to travel. For example, when onboard restrooms do not meet the minimum accessibility requirements, which is the case for most single-aisle planes, passengers with disabilities have to make their own accommodations, including limiting the intake of fluids ahead of the flight, using a catheter or an adult diaper.²¹

Besides, air travel is one of the few forms of travel where wheelchair users cannot stay in their own chair.²²

The passenger always needs to be transferred to a regular cabin seat, leading to discomfort and distress when their dignity, safety and comfort are not respected. This can happen, for instance, when assistance services are not well trained to transfer the passenger, when the right equipment is not available or when the passenger is boarded last and the transfer is performed in front of all passengers.

The situation does not get any better once seated in the plane. Sitting in a confined space without adequate cushioning and lumbar support can lead to body pain for some passengers with disabilities.²³

20 European Civil Aviation Authority (ECAC) Doc 30 contains some guidelines on accessibility of aircraft. Point 5.3.3.1 - https://www.ecac-ceac.org/images/documents/ECAC-Doc_30_Part_1_12th_edition_May_2018_Amendment_4_Nov_2020.pdf

21 Brandt, Y., Poria, Y. & Reichel, A. 2009. The Flight Experiences of People with Disabilities: An Exploratory Study

22 Allen, A; Berger, C; Brennan, K; Brouwer, H; Celeste, P; Chanda, M; Damman, J; Dentice, K; Elsbury, N; Engstrom, H; Ferrari, E; Franke, J; Harrell, C; Jaeger, J; Khera, J; Lach, B; McDonald, M; Miller, A; Mishra, A; Mueller, H; Ramadorai, H; Scott, K; Shen, L; Smith, G; Villa, T; Walker, J; and Duerstock, B. (2019) Report on the Challenges of Air Transportation Experienced by People with Disabilities. *Undergraduate Coursework*. Paper 2. <https://docs.lib.purdue.edu/ugcw/2>

23 Same source as previous footnote.

Finally, not all carriers allow the passenger to remain in their wheelchair until the boarding gate, obliging them to use a regular airport wheelchair, which may not fit them, for several hours and undergo several transfer processes.

“In theory, wheelchair users will board first. In practice, this often does not happen, meaning that we must be lifted from a small and uncomfortable wheelchair into the aircraft seat in front of all other passengers. As well as being undignified, this is extremely dangerous to my health as the assistance service doing the process are often lacking in training. Even if they are trained, there is still a high risk of damage to my body in the process. During the flight, toilets are not accessible meaning that I have to plan ahead and ensure I have solutions in place in case of delayed take-off or landing. Apart from this, the aircraft seats are extremely uncomfortable for someone with my disability. Again, this risks medical complications.”

Passenger with a physical disability (Belgium) 

Airport accessibility

Airports should provide accessible facilities to ensure that all passengers can navigate them safely, comfortably and independently. Despite the progress in recent years, especially with newly built airports, there are still barriers that exclude persons with disabilities.


Some barriers can arise from the lack of accessible transport to reach the airport itself, big distances inside the terminals, complex navigation layouts, unclear signage and wayfinding, long queuing time, overstimulating environments, inaccessible digital devices for check in and passport controls, lack of changing places, limited seating possibilities, lack of relief areas for assistance dogs and inaccessible shops and restaurants.

In addition, there are still airports that do not provide jet bridges to board the plane, obliging passengers to use stairs and assistance services to rely on different ad-hoc solutions to board passengers, including stair climbers.

“U.S. airports have service animal relief areas, but no EU airport I have visited thus far has one so you need to take your dog to go out before you go through security, then go all the way back out of the airport to an area usually further away right before you board and then have to go back through security again which adds additional stress to the trip. There is also the issue of travel once we leave the airport because not all taxis will take us even if they have a policy forcing them to do so.”

Passenger with a physical disability (Lithuania) 


“When travelling with my disabled daughter, the availability of changing toilet facilities is an issue. We have had instances that because of the lack of this couch, my daughter had to lay down on the bathroom floor to have her diaper changed”

Relative of a passenger with a neurodevelopmental disability (Malta) 

“It can be difficult to navigate airports for passengers with intellectual disabilities. Airports are really big and have a lot of stops (for example: check in, drop-off baggage, security, passport control, and the gate). So it is easy to get confused or lost. For people with intellectual disabilities, it is important that there is always staff available to help with directions or ask questions to.”

Relative of a passenger with an intellectual disability (Netherlands) 

“When having passed security, then comes the departure lounge, which is often crowded, smelly (perfume), and noisy. And there is no alternative to go directly to the gate without having to go through at least one shop.”

**Infrequent passenger with a developmental disability
(Belgium)** 

Assistance dogs

Assistance dogs are a special category of animals that have been selected and trained to provide unique support to persons with disabilities and reduced mobility. In order to ensure that such dogs do not pose an aviation safety risk, they are also trained to move sagely in public spaces and be obedient to their handler. These dogs are allowed to travel free of charge in the cabin with their handler.

While this right might be clear on paper, putting it into practice has proved more difficult. Due to the lack of EU rules on assistance dogs, each country follows different practices for the training and recognition of assistance dogs.

As explained in chapter 3, these practices are not always mutually recognised by all airlines, leading to situations of denial of boarding to dogs that have been properly trained to carry out their tasks. Even when accepted, the practices for the transport of the assistance dog in the cabin are different for each carrier, especially when it comes to provision of a seat with extra legroom or the type of documents requested. This issue has been covered by EDF Position paper on assistance dogs²⁴.

24 European Disability Forum (2025) – Position paper on assistance dogs in air travel. Available at <https://www.edf-feph.org/content/uploads/2025/03/EDF-Position-Paper-on-assistance-dogs-transport-2025.pdf>

“Every single flight, I have to contact the airline weeks ahead of time and fight to have my dog approved, go back and forth for weeks providing documentation, access to my training organisation and trainer, access to my private medical records and pray that maybe the airline will accept them. Then if I finally have my dog approved, I print out my approval, because I cannot be sure the ticket agent at the gate will let my dog onboard despite having a certification of training, a doctor's note, an EU pet passport and written approval from the airline. No other group has to the extreme lengths of proof as service animal owners do.”

Passenger with a physical disability (Lithuania) 

“Some airplanes have little space for an assistance dog to stay during the flight. Some airlines fail to book the second seat that I need for extra space although they say they did it. When this happens, flight attendants have to sort it out while all passengers are boarding on the plane.”

Passenger with a chronic condition (Lithuania) 

“In September, my wife, who is also blind, and I flew for the first time with our guide dogs. It took two months of much discussion and stress beforehand to get the guarantee that our guide dogs would be transported in the cabin and not in the cargo hold.”

Passenger with a visual disability (Netherlands) 

Airport assistance

Passengers with disabilities and reduced mobility can request assistance services to overcome barriers at the airport and for boarding and disembarking. When everything goes well, the journey proceeds as planned. However, when the assistance is delayed, badly delivered or does not show up at all, the passenger can miss a flight and experience physical and psychological harm.

"I have many examples of good experiences with airport assistance throughout Europe. However, I have had a few bad experiences when assistance has arrived so late that the plane has already had its doors closed and I have almost been denied boarding due to the delay in assistance. Another time, the assistance did not come to pick me up when I got off the plane. Outside of these specific experiences, most of the time I have been very happy with the service at all levels."

Passenger with a visual disability (Czechia) 

"Despite arriving well in advance at Dublin Airport, the assistance I requested was delayed. As a consequence, the carrier did not allow me to board and offered me another flight the next day (without paying for the expected extra night). I could not stay longer in Ireland, as I had important commitments back at home. The only option I had was to fly to Amsterdam and pay an adapted taxi to take me back to Brussels (the flight landed late at night and there were no trains available). As a result of the delay in the assistance, I had to pay extra hours for my personal assistant and the taxi fare, amounting to more than 500 EUR. I made it home at 5am."

Passenger with a physical disability (Belgium) 

Information and communication

Passengers need information regarding the departure gate and time, safety instructions, and potential disruptions during the journey. This information can be provided directly in a mobile app, through information screens, audio announcements or in person by airport and air carrier staff.

Unfortunately, information is not always accessible to persons with disabilities, especially those with visual, hearing, speech and cognitive disabilities. Common barriers include the reliance on only one sensory channel to convey information (mainly visual or auditory) and the quality of the information conveyed (for example, the volume, clarity and speed of announcements).²⁵

“Lots of important information in the airports and onboard the airplane is only verbal. Check in-counters, security checkpoints have no assistive listening systems, and the environment is often very noisy. Onboard important security and flight information is most often only verbal and very hard to understand.”

Passenger with a hearing disability (Sweden) 

“If I want to call the airline call center, our remote sign language interpreting service is not open 24 hours a day.”

Passenger with a hearing disability (Belgium) 

‘As a deaf person, I cannot understand spoken announcements. Acoustic accessibility regarding reliable written information is not or only rarely available.’

Passenger with multiple disabilities (Austria) 

25 Op. cit. footnote 27.

Security, check in and border procedures

Before boarding the plane, passengers need to complete the check in process and go through security control and border procedures. This process can be extremely difficult for persons with disabilities, not only because there are often long queues and lot of actions to perform under time pressure, but also because the process can become extremely distressing if the personnel in charge have not received training on disability-related matters.

Problems include inappropriate requests to remove clothing or prosthetics without respect to privacy, separation from assistance dogs or accompanying persons, or bad treatment to passengers with invisible disabilities.

“Then comes security, which always gives me nightmares. Having to part with belongings that help me regulate my anxiety level is very difficult, even if it is only for a few minutes. Not knowing if the security check will fail and lead to a body search is also very stressful.”

Passenger with a developmental disability (Belgium) 


“As a person who travels with a medical detection dog, some barriers I have encountered include the separation from my dog during the customs control and the request to show the medical device on my body with undressing in front of all the other people.”

Passenger with a chronic condition (Netherlands) 

"Boarding and security checks are increasingly difficult with new technology. Most airports are forcing people to use self-check in devices that are not accessible for blind people. Similarly, on arrival to destination, we have to use face recognition devices that require a person to know where to visually look so a machine can identify you. With my vision impairment, it does not always work as I can never accurately look in the direction needed. It is often an awkward and humiliating process that holds up people in the queue behind and I am often forced to try it multiple times before the staff realise it will not work."

Passenger with a visual disability (Ireland) 

"Passengers with intellectual disabilities can often have problems using the accessibility line at security control. The accessibility line allows for more time to do the security check and is often quieter. However, it is not always easy to get access as many intellectual disabilities are invisible."

Relative of a passenger with an intellectual disability
(Netherlands) 

Disruptions

Delays and cancellations are always an inconvenience for all passengers. However, the consequences for passengers with disabilities are more severe. For example, if passengers are offered an alternative flight, the transport of the passenger with disabilities is not guaranteed since the conditions for the transport of their mobility equipment might differ. Similarly, if a cancellation obliges the passenger to spend an extra night, the hotel offered to all passengers might not be accessible to those with disabilities.


"Another time that my flight was cancelled, there was no special provision for people with disabilities that had booked assistance. We had to rush through the airport like everyone again to the check-in counter and we were attended on a first comes first served basis."

Passenger with a physical disability (Spain) 

"Once I had my flight extremely delayed, I was travelling with my personal assistant, and I had booked an adapted taxi to pick me up at the airport upon arrival. As a result of a delay, I had to pay extra hours to my personal assistant and the extra waiting time to the taxi driver. There are not many adapted taxis that is why I had booked one in advance. The taxi had come on purpose to the airport so I had to pay all the extra hours."

Passenger with a physical disability (Belgium) 

"We travelled only once by plane with my child, but the experience was very bad and now I am afraid to fly again with him. The problem was that our flight was very late and when we landed, nobody came to meet us. The people who take care of luggage didn't deliver our wheelchair and we were left in the airport at the midnight alone and did not know what to do. Finally my husband found our wheelchair in luggage sector. But we had to carry our child (40 kg) to that place!"

Relative of a passenger with a physical disability (Lithuania) 

Time to complete the journey

Passengers with disabilities need to spend more time to complete the journey. Even if the duration of the flight itself is short, persons with disabilities need to foresee extra time to reach the airport, request assistance, complete the check-in, board, and disembark at destination.

“On two occasions my customised wheelchair was not brought to the door of the aircraft. This meant I had to sit for a longer period of time than necessary in the aisle chair putting me in considerable discomfort and at risk of injury.”

Passenger with a physical disability (Ireland) 

“Using the assistance service is quite time-consuming, with some extensive waiting time sometimes (for example after deboarding) so that we gave up requesting it.”

Passenger with multiple disabilities (Luxembourg) 

“I need to wait for longer time until receiving my wheelchair or crutches after arriving at the destination. Most assume I travel for leisure only, hence I ought to have time, but I travel for business frequently and regardless I don't see why my time is less worth than others'. If I was provided with my mobility aids quickly, I can be independent and faster.”

Passenger with a physical disability (Austria) 

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Chapter 2:

EU policies to ensure equal access to air transport for persons with disabilities



To address some of the barriers mentioned in chapter 1, the European Union has adopted Regulations, Directives and Guidelines. Most notably:

- **Regulation 1107/2006** concerning the rights of disabled persons and persons with reduced mobility when travelling by air.
- **Regulation 261/2004** establishing common rules on compensation and assistance to passengers in the event of denied boarding and of cancellation or long delay of flights.
- **Directive 2019/882** on the accessibility requirements for products and services (“European Accessibility Act”).

In 2024, the European Commission adopted its revised interpretative guidelines on Regulation 1107/2006, clarifying how airlines, airports and national enforcement bodies should implement this legislation. It is important to highlight that these guidelines are not mandatory.

This report will focus mainly on the implementation of Regulation 1107/2006 as this is the law that provides most of the rights for passengers with disabilities in air transport.

Regulation 1107/2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air

The aim of Regulation 1107/2006 is to provide passengers with disabilities and reduced mobility with non-discriminatory access to air transport services. The regulation lays down a list of rights for passengers with reduced mobility and disabilities and obligations for airports, air carriers (and their agents), tour operators and Member States. Some of these rights are the provision of assistance and the transport of mobility equipment and assistance dogs at no extra cost and compensation when they are mishandled.

The regulation applies to flights with departure from, on transit through or with arrival to an airport situated in the territory of an EU

Member State, Iceland, Norway and Switzerland. Some obligations also apply to flights departing from and arriving to a third country if the carrier is an EU air carrier¹.

Current gaps in Regulation 1107/2006

While Regulation 1107/2006 has improved access to air travel for persons with disabilities, especially by establishing the principle of free of charge assistance at the airport, there are still many barriers and discrimination against passengers with disabilities. This situation is in clear contradiction with [United Nations Convention on the Rights of Persons with Disabilities \(UNCRPD\)](#).

Notable gaps, which are explained in more detail in chapter 3, include:



Denial of boarding

Despite the prohibition to refuse carriage on the grounds of disability, divergent and untransparent safety considerations by the airlines as well as inaccessible aircraft designs still lead to situations of denial of boarding. Some of these aspects are not defined by law and give airlines a wide margin of interpretation, to the detriment of the passenger.

“My wheelchair is very large and cannot be folded easily. Once I arrived to the airport, and the company had changed the type of planes, from a larger to a smaller one, which meant that my wheelchair could no longer be placed in the cargo room. I had to wait 6 hours for the next departure without compensation, and the company I should travel with had to travel without me. I was left behind.”

Passenger with a physical disability (Denmark) 

¹ See Article 1(2) of Regulation 1107/2006



Mandatory accompanying person

Similar to the point mentioned above, air carriers are still allowed to oblige passengers with disabilities to travel with an accompanying person “for safety reasons”. If this is the case, the passenger with a disability has to pay for the extra ticket.



Limited liability for mobility equipment

Air carriers and airports are not liable for the full value of damaged, lost or destroyed mobility equipment or injured assistance dogs. The reason for this is that mobility equipment is considered regular luggage under the Montreal Convention (transposed into EU law in Regulation 2027/1997). This convention limits compensation for luggage to 1,288 SDR (around EUR 1,581), which cannot cover damages or loss of a made-to-measure wheelchair that can be EUR 10 000 or more. This results in a huge burden for the passenger, both financially and emotionally.

“Both times that my mobility devices have been damaged (a scooter type device and a manual wheelchair), the company didn’t pay for the necessary repairs, even though I filed the claim to the company and to the travel insurance that I had booked with the flight. Both times it was a low-cost company.”

Passenger with a physical disability (Spain) 



Inadequate quality of assistance services

Despite the right to assistance, not all passengers received it on time or received it at all. In some cases, cost is prioritised over quality, resulting in danger to health and safety of passengers (and sometimes assistance staff themselves). For example, some airports use stair climbers instead of Ambulifts as boarding aids or wheelchairs that are not comfortable nor safe².

"In Lisbon, I was placed in a corridor for 3 hours waiting for the plane, with no access to toilets, water or food and no way to contact the assistance who had left me there."

Passenger with a physical disability (Portugal) 



Ineffective redress

While passengers are entitled to some sort of compensation when disruptions occur (like delays or cancellations under certain circumstances), persons with disabilities do not get any compensation when they do not receive appropriate assistance, are denied boarding, or the travel information is not accessible. Not only this, but complaint procedures themselves can be inaccessible, difficult to find and complex. Going to court should never be the only available option to find redress, as it is time consuming and expensive.

"I complained about our lack of assistance at the arrival airport. The airport just said 'sorry', the airline concerned didn't solve anything and tried to make it look like it was our fault."

Relative of a passenger with a disability (Lithuania) 

2 European Disability Forum (2020), Position Paper on Air Passenger Rights for Passengers with Disabilities, page 12 and 13, https://www.edf-feph.org/content/uploads/2021/02/edf_position_paper_on_air_passengers_rights_for_persons_with_disabilities_2020.pdf



Prenotification

While most passengers can buy tickets at the last minute, persons with disabilities have to pre-notify their intention to travel 48 hours in advance to be certain they will be allowed to travel. While airports and airlines can try to accommodate requests received under 48 hours, it does not apply to specific assistance requests, such as passengers travelling with wheelchairs and assistance dogs.

"I had to book a last-minute flight to attend an emergency family matter. Since I could not respect the 48h prenotification requested by the carrier, I had to travel without my hearing dog."

Passenger with a hearing disability (Finland) 



Ineffective enforcement

National Enforcement Bodies (NEB) often lack the necessary powers and resources to properly monitor and enforce compliance with Regulation 1107/2006.

More importantly, some of the barriers to air travel explained in the previous chapter are not even inside the scope of the Regulation, remaining largely unaddressed by public authorities. This includes:



Accessibility of planes and airports

One of the biggest obstacles to enjoying full and equal passenger rights is the fact that the planes, the airports, related infrastructure, and information before and during journeys (airline websites, airport and on board information) are not accessible. This is especially regrettable because better accessibility could lead to fewer assistance requests if passengers can use the infrastructure more independently. While the European Accessibility Act will address digital barriers and national legislation on the built environment can address some barriers inside airports, the main physical barriers will continue to exist.

“My wheelchair cannot be folded entirely, so my choice of the final destination and travel as such depends on the airline and if they are operating the route with the aircraft with appropriate cargo hold dimensions.”

Passenger with a physical disability (Slovenia) 



Lengthy approval processes

Passengers with disabilities, especially those travelling with mobility devices and assistance dogs, still have to liaise at length with airlines before getting official approval to fly. The process can take several weeks and may need perseverance on the part of the passenger.

“When preparing a trip to Japan, we spent 3 weeks booking flights with different airlines but had our tickets cancelled and new prices doubled before wheelchair was approved so that we were forced to look for new tickets. We couldn't purchase the tickets until the approval and due to the fact that many airlines have codeshare lines at the moment, the customer must do all the requests by themselves by all the different airlines. A few months after buying our tickets, one of the flights was cancelled and were offered an alternative with a partner airline. However, we had to fill in all the forms again.”

Passenger with a physical disability (Belgium) 



Affordability

While passengers with disabilities cannot be charged extra for flying, there are still many indirect costs that end up putting them at disadvantage. This includes buying extra tickets for accompanying persons, reserving tickets with extra legroom or additional seats for more comfort, booking an adapted taxi to and from the airport or restricting travel options to direct flights and carriers with better practices

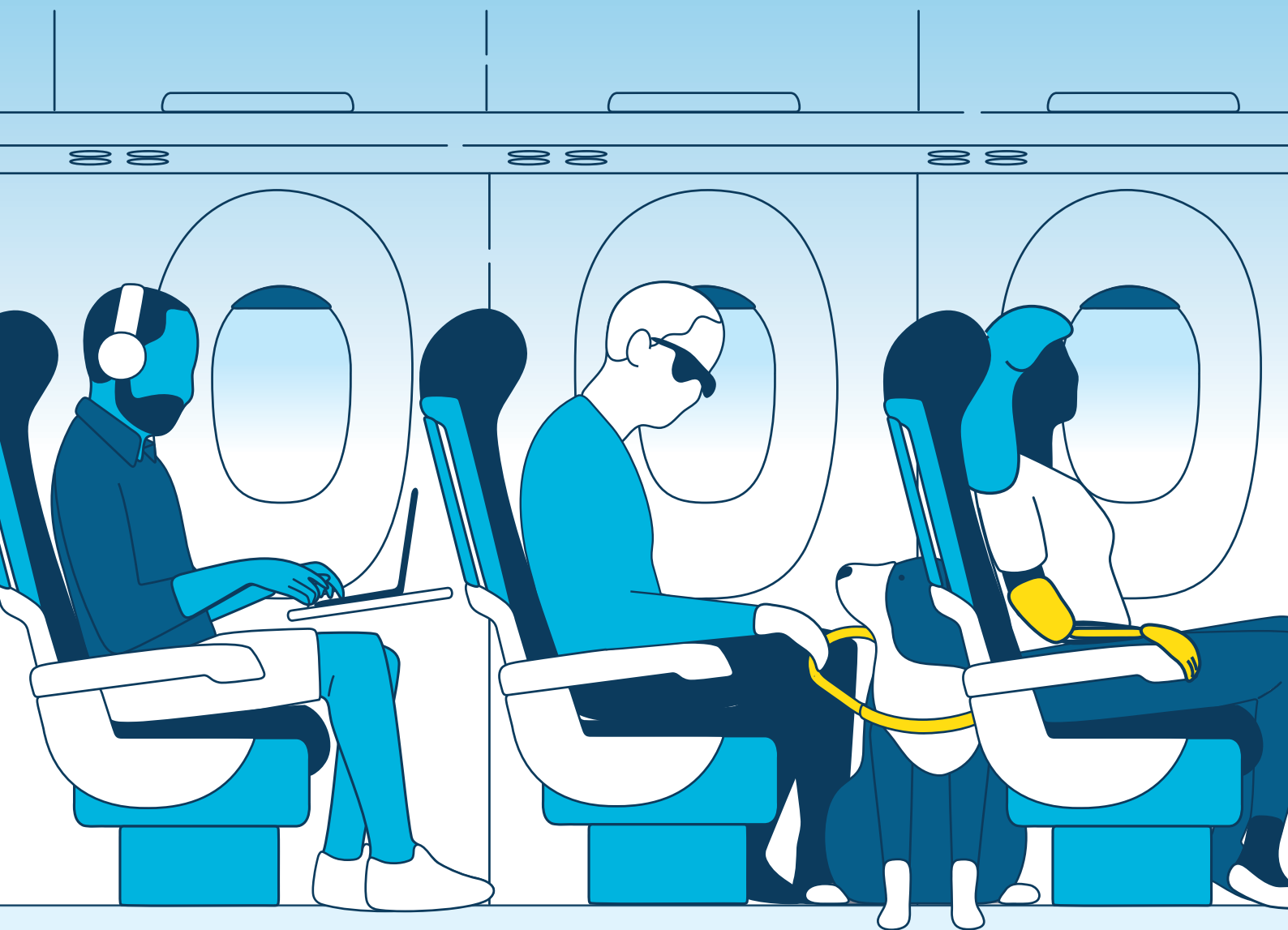
“Affordability of the journey is always a barrier for me, specifically because most of the time I need to travel with my personal assistant. Also from another perspective, even if I travel alone, I might not be able to afford a more comfortable seat, and since I have much less mobility options in the airplane than others, I experience uncomfortable long flights.”

Passenger with a visual disability (Belgium) 

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Chapter 3:

Implementation of Regulation 1107/2006



In this chapter we will assess the actual implementation of Regulation 1107/2006 by airports, airlines and relevant authorities. The goal is to provide evidence on how existing legal gaps can restrict one's right to accessibility and transport and make the case for its necessary revision.

Prohibition from refusing reservation or carriage

According to Article 3 of Regulation 1107/2006, airlines cannot refuse a reservation or carriage to a person with reduced mobility. However, there are some situations where the refusal would be allowed: to comply with safety requirements or if the size of their aircraft and its doors make the boarding physically impossible.

While any exception to the right to travel and non-discrimination should be clearly defined, the EU aviation safety rules are not very detailed and give much discretion to airlines.

In addition, although airlines are required to publish the safety requirements they apply to the transport of persons with disabilities in their website, this information is not always available.

Limitations on the number of persons with disabilities and reduced mobility per flight

The 'safety' exceptions under Article 4 allow air carriers to deny boarding to persons with disability and reduced mobility in a flight if they exceed a specific number. Their 'assumption' is that their presence in large numbers could compromise the safety of the flight, especially in the event of an emergency.

While legislation does not establish the specific number of persons with disability and reduced mobility that would 'compromise' the safety of the flight, the European Union Aviation Safety Agency (EASA) recommends the following: as long as these passengers do

not exceed more than 50 per cent of the total amount passengers and they comply with other applicable requirements, they should be allowed to fly. The idea behind is that there should be enough passengers capable of assisting them in the event of an evacuation.¹

Only 10 out of the 30 airlines analysed publish their criteria to determine the limit on the number of passengers with disability and reduced mobility allowed on board.

Limitation of passengers with disabilities and reduced mobility per flight	
Available	<p>50% of passengers: Luxair, Iberia, Aegean, Easy Jet, ITA Airways</p> <p>10% of aircraft capacity: Vueling</p> <p>Limit of wheelchairs on board: Ryanair, TAP, SAS and TAROM</p>
Not Available	<p>KLM, Lufthansa, Eurowings, LOT, KM Malta, Air Baltic, Aer Lingus, Sky Express, Transavia, Air France, Nyxair, Wizz air, Cyprus Airlines, Finnair, Braathens, Bulgaria Air, Croatia Airlines, Austrian Airlines, Brussels Airlines, Smart Wings</p>

¹ The EASA guidelines recommend that the number of special categories of passengers (SPC), which also includes persons with disabilities, should not exceed the number of passengers capable of assisting them in case of an emergency evacuation. SPC also includes unaccompanied children, deportees or prisoners in custody.

The 10 EU airlines that have published this information apply different methods to set limits of passengers with disabilities and reduced mobilities on board. While half of them follow the EASA recommendation, the rest seem to focus only on passengers using wheelchairs.

Among them, some set limits for the transport of mobility equipment (Ryanair and SAS) irrespective of the type of assistance requested by the passenger, others seem to limit it only for non-ambulatory wheelchair passengers² (TAP and TAROM).

While the size of the hold could be the criteria to determine the number of wheelchairs that can be transported in a specific flight, there are different wheelchair limitations even when air carriers use the same aircraft model.

For example, SAS has a limit of 6 wheelchairs in an Airbus A320 while TAP has a limit of 8 WCHC passengers in the same aircraft model.

Limit of wheelchairs on board	
Boeing 737	Ryanair – 2 Wheelchairs TAP – 3 WCHC TAROM – 2 WCHC
Airbus 320	TAP – 8 WCHC SAS – 6 wheelchairs
Airbus 330	TAP – 6 WCHC SAS – 14 wheelchairs
ATR 72	Aer Lingus – 1 Electric Wheelchair TAROM – not available

² This typology of passengers is represented by the assistance code WCHC and refers to individuals who primarily, or exclusively, rely on a wheelchair for mobility.

Criteria for the imposition of an accompanying person

According to Article 4 (2) of Regulation 1107/2006, air carriers can oblige persons with disabilities and reduced mobility to travel accompanied if they are unable to meet applicable safety requirements autonomously.

While many passengers with disabilities requiring assistance already choose to travel accompanied with a personal assistant for their own safety and comfort, airlines can nevertheless impose an accompanying person to those deciding to travel alone. This decision not only is taken against the will of the passenger but also puts the financial burden on them, as those passengers have to purchase an additional ticket for the accompanying person.³ Airlines can make this decision at the boarding gate, leaving the passenger no time to find an accompanying person.

Again, Regulation 1107/2006 does not specify in which specific circumstances airlines should impose an accompanying person. This lack of clarity gives them a lot of freedom to decide on the criteria. Additionally, little information is available on how airlines assess the capacity of the passenger in meeting such safety requirements.

The European Commission interpreted that airlines should take such decision applying the self-reliance criteria.⁴ This includes the capacity of the passenger to fasten and unfasten the seatbelt, leave the seat and reach the emergency unaided, retrieve and fit the lifejacket, put on the oxygen mask without assistance and understand the safety briefing and instructions given by the crew in event of emergency. Comfort considerations such as being able to eat or use toilet independently should not be used to impose an accompanying person.

3 The European Commission proposed to provide this ticket free of charge in the 2023 Proposal on Enforcement of Passenger Rights - <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52023PC0753> The proposal needs to be adopted by the European Parliament and Council of the EU to become law.

4 European Commission Interpretative Guidelines on Regulation (EC) No 1107/2006 of the European Parliament and of the Council concerning the rights of disabled persons and persons with reduced mobility when travelling by air (2024) - <https://eur-lex.europa.eu/eli/C/2024/5992/oj>

Only **10** EU Air carriers follow strictly the self-reliance criteria advised by the European Commission.

Among the rest:

9 apply comfort considerations that should not be required.

7 can impose an accompanying person based on the specific disability of the passenger.

4 have not published their criteria.

Among the 10 carriers that mention specific disabilities as a reason to impose an accompanying person, the most common are deafblind and 'quadriplegic' passengers. Additionally, some carriers also apply restrictions to passengers who could travel alone in other airlines, including deaf or blind passengers, and those requiring wheelchair all the time (WCHC). Some examples include:

- **Sky Express:** deaf or 'quadriplegic'⁵
- **Transavia:** 'visually impaired, blind and/or deaf'⁶
- **Nyxair:** have a mental or physical disability that requires assistance⁷

5 Special Assistance, Sky Express. Retrieved the 10 July 2025: <https://www.skyexpress.gr/en/sky-experience/before-fly/special-assistance>

6 Transavia, personal assistance on board, Retrieved the 10 July 2025: <https://www.transavia.com/help/en-eu/medical-services-assistance/assistance-on-board/personal-assistance-on-board>

7 Special Assistance, Nyxair, Retrieved 10 July 2025, <https://flynyx.com/travel-info/before-travelling/special-assistance.html>

- **Wizz Air:** if you are not able to move on your own, if you cannot communicate with the crew due to learning or cognitive disability, blindness or deafness⁸
- **Cyprus Airlines:** passengers fitting the WCHC description have to be accompanied by one assisting person⁹
- **Aegean:** deafblind passengers¹⁰
- **Brussels Airlines:** deafblind passengers¹¹

While there is little information on how the airlines apply these criteria, the above examples have also found some good practices. For instance, KLM offers the passenger help to find someone at the airport willing to act as safety assistance.¹²

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8 Special Assistance, Wizzair. Retrieved 10 July 2025, <https://www.wizzair.com/en-gb/information-and-services/travel-information/special-assistance>

9 Passengers with disabilities, Cyprus airlines, Retrieved 10 July 2025, <https://www.cyprusairways.com/en-gb/info/special-assistance/passengers-with-disabilities/>

10 Traveling by Air, Aegean. Retrieved the 10 July 2025, <https://en.aegeanair.com/travel-info/travelling-with-aegean/special-assistance/traveling-with-people-with-special-needs/extra-details/>

11 Travel Companiion, Brussels Airlines. Retrieved 10 July 2025, [Travel companion | Brussels Airlines](#)

12 KLM, Mobility Assistance, Retrieved 29 April 2025, <https://www.klm.be/information/assistance-health/mobility-assistance>

Right to assistance on board of the plane

Air carriers are obliged to provide assistance to passengers with disabilities or reduced mobility subject to minimum 48 hours prenotification and presence at the designated point of arrival and check in (Article 10 and Annex II of Regulation 1107/2006).

This assistance includes the carriage of assistance dogs in the cabin (subject to national regulations), the transport of medical equipment¹³, two pieces of mobility equipment (subject to possible limitations of space on board of the aircraft and application of relevant legislation concerning dangerous goods), communication of essential information concerning the flights in accessible formats and provision assistance in moving to toilet facilities.

The carrier must also make reasonable efforts to arrange a seating that meets the needs of the passengers and, when needed, to provide the accompanying person with a seat next to them.

Carriage of mobility equipment

In order to guarantee the transport of mobility equipment, airlines ask the passenger information on the dimension and weight of the mobility equipment and the type of battery used, including the watt-hour rating.

If the mobility equipment does not meet the criteria set by the air carrier, the wheelchair cannot be carried, leading to an indirect case of denial of boarding. This situation can happen because the wheelchair is too big or heavy to be transported in a specific aircraft model, the batteries used by the mobility device do not meet the safety requirements or the airline has a limit on the number of wheelchairs that can be transported in the hold.

13 There is no definition of medical equipment but it could include medical oxygen, medicines or respirators, among many others.

Again, it is not clear how airlines define some of these requirements. The review has revealed significant differences in size and weight restrictions even when using the same aircraft model. The wheelchair might or might not be taken even if two different airlines use the same plane. 🔍 See [annex 4](#).

For example, in an **Airbus A320**, very commonly used for many intra-EU flights, the maximum weight allowed by different airlines ranges from 150kg (Braathens¹⁴) to 300kg (Finnair¹⁵). Similarly, in an **ATR-72**, used for regional flights, the maximum weight allowed ranges from 80kg (SAS¹⁶) to 200kg (Finnair¹⁷). It is not rare to find some wheelchairs weighing around 200kg¹⁸. As a result, their carriage would depend on the conditions of the airline the passenger travels with, even when the same aircraft model is used.

Although there seems to be more consistency between carriers when it comes to size restrictions, differences also exist. For example, the maximum height allowed in an **Airbus A320** ranges from 100 cm (Finnair¹⁹) to 124 cm (TAP²⁰). In an **Airbus A321** it can range from 85 cm (Transavia²¹) to 124 cm (TAP²²). In an **ATR 72** height restriction can vary from 100 cm (Braathens²³) to 150cm (Aer Lingus²⁴). While some airlines seem to define the size restrictions

14 Braathens, Mobility Aids, retrieved 29 April 2025, <https://charter.braathens.com/en/health-and-assistance/mobility-aids/>

15 Finnair, Wheelchair, mobility aids and other devices, retrieved 29 April 2025, <https://www.finnair.com/be-en/special-assistance-and-health/wheelchairs--other-mobility-aids-and-medical-devices>

16 SAS, Assistance, retrieved 29 April 2025, <https://www.flysas.com/be-en/travel-info/special-travel-needs/assistance/>

17 Same as footnote 40

18 Permobil. Permobil M5 Corpus. Retrieved 14 March 2025: <https://www.permobil.com/en-gb/products/power-wheelchairs/permobil-m5-corpus>

19 Same as footnote 40

20 TAP, Wheelchair, Retrieved 29 April 2025, <https://www.flytap.com/en-be/information/special-needs/wheelchair>

21 Transavia, Wheelchair, Crutches walking, transporting. Retrieved 29 April 2025, <https://www.transavia.com/help/en-eu/medical-services-assistance/wheelchair-crutches-walker/transporting>

22 Same source as footnote 45.

23 Same sources as footnote 39

24 Aer Lingus, Disability Assistance, retrieved 29 April 2025, <https://www.aerlingus.com/support/special-assistance/disability-assistance/>

based on the cargo door dimensions, other airlines to follow other considerations.

Air France and **Austria Airlines** have no size / weight limit for most of the aircraft. However, Austrian ask the passenger to contact them if wheelchair exceeds a certain weight / size.

Only 18 out of the 30 airlines analysed publish the details on the size and weight restrictions they apply to the transport of mobility equipment.

Restrictions on the carriage of mobility equipment	
Available	Finnair, LOT, Braathens, SAS, Eurowings, Aer Lingus, TAP, easyJet, ITA, Transavia, Brussels Airlines, Luxair, Ryanair, KLM, Austrian, Air France, Lufthansa, Nyxair
Not Available	KM Malta, Air Baltic, Sky Express, Iberia, Wizz air, Cyprus Airlines, Aegean, Bulgaria Air, Croatia Airlines, TAROM, Vueling, Smart Wings

"I was denied boarding last minute at Heathrow Airport, after being held up at the check in desk for 3 hours, because I was travelling with my Power Wheel Add on. I had travelled to London 4 days earlier with the wheel with no issues."

Passenger with a physical disability (Ireland) 

Carriage of a recognised assistance dog

Regulation 1107/2006 guarantees the right to travel with a recognised assistance dog in the cabin free of charge. Passengers who request this assistance are often requested to provide a proof that the dog has been specifically trained to support them.

However, as EDF Position paper on assistance dogs explains²⁵, there are no common EU level rules on training, accreditation or certification of assistance dogs and approaches might differ from country to country. This diversity of practices can make it difficult for airlines to assess whether a dog actually qualifies as a 'recognised assistance dog'. As a result, airlines have adopted inconsistent approaches.

While some carriers are flexible, others follow more restrictive practices and only accept documents from the International Guide Dog Federation (IGDF), Assistance Dog International (ADI) and their accredited members. This approach excludes assistance dogs that have been properly trained or certified by other means, including national certification systems or small training schools that are not IGDF or ADI accredited.

I had a hearing dog (recently deceased) and flew with him 50 times in Europe. Every time was a stressful nightmare! The dog was fine, but the airlines never failed to make it difficult.

Passenger with a hearing disability (Finland) 

Due to these different practices, assistance dog users might experience problems and denial of boarding when flying with certain airlines, even if accepted in others.

25 European Disability Forum (2025). Op. Cit. in footnote 29

19 airlines

(out of 30) are flexible on the training documents they accept.


7 airlines

(out of 30) have in place more restrictive policies, either by only accepting ADI and IGDF credentials (4 airlines) or only official documents from a specific country (3 airlines).

Additionally,


4 airlines

do not publish any information in this respect.

 See [annex 6](#).

Once accepted for transport, airlines can also decide on certain requirements for the presence of assistance dogs in the cabin. While this should be kept to the minimum necessary (training documents and vaccination documents), some airlines request additional documentation from the passenger, including medical certificates, which can put them at a disadvantage.

Only **17 airlines** out of the 30 Air Carriers analysed adhere to the minimum necessary.

10 airlines require extra documentation, ranging from a written confirmation that the dogs meet the requirement for the trip (i.e. LOT or Eurowings) to a medical passenger/ veterinary documentation (i.e SAS, Air France, Luxair)  See [annex 7](#)

Availability of cabin wheelchair

Cabin or on-board wheelchairs are specifically designed to fit airplane aisles. They allow the passenger requiring them to move around the cabin. Since passengers cannot use their own wheelchairs during the flight, cabin wheelchairs are extremely important to help the passenger move from their seat to the toilet.

Although airlines are obliged to assist in moving to toilet facilities, there is no direct EU obligation for airlines to provide cabin wheelchairs. As a result, not all passengers will be able to request them in case of need.²⁶

This can lead to disturbing and demeaning consequences like the recent case of a British journalist who had to crawl on the floor of the plane to reach the toilet because airline did not have a cabin wheelchair.²⁷



Only 14 airlines (out of 30) announce the availability of cabin wheelchairs on all their planes.

Among them:

11 airlines seem to have them by default

3 airlines can provide them on demand

3 airlines only provide cabin wheelchair in certain flights (mainly long haul)

3 airlines confirm the lack of provision of cabin wheelchair



Again, **10 airlines** fail to comply with transparency obligations and do not have any information on the availability or lack of cabin wheelchair.

26 While there is not direct obligation to provide a cabin wheelchair, in practice this is the only way to provide assistance in moving to and from the toilet, as required by Annex II of Regulation 1107/2006.

27 BBC (2024), I had to crawl to plane toilet – BBC's Frank Gardner. Retrieved 17 April 2025 <https://www.bbc.com/news/articles/c7490n4rnkpo>

Availability of cabin wheelchair	
Provided in all flights (by default or demand)	KLM, Lufthansa, Eurowings, LOT, Air Baltic, Ryanair, Aer Lingus, Transavia, Air France, Wizz air, Finnair, Easy Jet, Austrian, ITA Airways
Provided in some flights	Iberia, TAP, SAS
Not provided in any flight	Luxair, Tarom, Vueling
Information not available	KM Malta, Sky Express, Nyxair, Cyprus airlines, Aegan Airlines, Braathens, Bulgaria Air, Croatia Air, Brussels Airlines, Smart Wings

Right to assistance at airports

Passengers with disabilities and reduced mobility have a right to assistance at airports at no additional cost, to enable them to access a flight (Article 7 and Annex I of Regulation 1107/2006). Such assistance must enable them to proceed from the designated point of arrival at the airport to the plane and vice versa, including boarding and disembarking.

Airports are obliged to provide such assistance when the person notifies their need for assistance at least 48 hours in advance. If no notification is made, airports must nevertheless make all reasonable efforts to provide the assistance.

Airports are responsible for handling of all necessary mobility equipment from the moment the person checks it in to the moment that it is on the plane, and from the moment it is unloaded from the plane until the passenger receives it (called ground handling), subject to certain limitations²⁸. They are also responsible for the temporary replacement of damaged or lost mobility equipment, and the provision of flight information in accessible format.

To receive assistance, the passenger needs to either present themselves for check-in or arrive at the airport designated points of arrival or departure (call points) at the time stipulated by the air carrier, its agent or the tour operator.²⁹

Point of arrival and departure for assistance (call points)

Article 5 paragraph 1 of Regulation 1107/2006 requires airports to designate one or more official point where passengers requesting assistance can announce their arrival. Such points must be clearly signed and offer basic information about the airport, in accessible formats.

Although it is not possible to verify how this provision has been implemented on the ground, airports are encouraged to provide this information on their website.³⁰

While the majority of airports analysed (33 out of 38) provide online information on their designated points for assistance, there are many differences in the way the information is provided:

- Some provide pictures and detailed written information about the specific locations of such points
- Other airports provide general indications or make the information difficult to find

 See [Annex 9](#)

28 Limitations on dangerous goods and size or weight restrictions might apply.

29 See Article 7(4) of Regulation (EC) No 1107/2006

30 European Commission Interpretative Guidelines (2025). Op. Cit. Foot note 36. Page 24.

“When we arrive alone at the airport, it is difficult to find the information desk or the PRM meeting point without the help of a third person.”

Passenger with a visual disability (France)

For example, **Sofia Airport** does not have this information in the main PRM page. Instead, it is found inside an inaccessible PDF where the Service Quality Standards are explained.³¹ **Munich Airport**³² provides extremely general guidance on the Q&A section: *Please proceed directly to your airline’s check-in desk or go to one of our information desks or an InfoGate counter.*

In contrast, **Dublin Airport**³³ provides more details to facilitate the passengers’ preparation:

If you have pre-booked assistance, please go to the Reduced Mobility Reception desk before you proceed through Security Screening. The Reception Desks are located on the departures/check in floors of Terminal 1 and Terminal 2, on the right-hand side when entering through the main access doors. Passengers can also go directly to their check-in desk and inform their airline during the check-in process that they have requested assistance. There are Reduced Mobility Help Points located across the campus and terminals. Assistance can be arranged from these points, via the call button or by calling the number displayed at the call point.

31 Service Quality Standards Sofia Airport (2016). Retrieved 18 March, https://sofia-airport.eu/wp-content/uploads/2021/11/prm_slas_en.pdf

32 Munich Airport, Accessible Travel. Retrieved 18 March 2025, <https://www.munich-airport.com/accessible-travel-260945>

33 Dublin Airport, Requesting Assistance. Retrieved 18 March 2025 <https://www.dublinairport.com/accessibility/requesting-assistance>

Contact information of assistance services

According to Article 6 of Regulation 1107/2006, air carriers, their agents and tour operators should receive assistance requests from passengers with disabilities and reduced mobility. Once received, they should be the ones transmitting the information to airport managing bodies that would provide the assistance.

Since the passengers' request assistance through the air carrier and the tour operator, airports are not obliged by Regulation 1107/2006 to receive such requests directly from the passenger. As a result, only some airports provide public contact details for their assistance services.

While it can only be considered a good practice, this information allows the passenger to request assistance through an alternative channel and to have a clear contact point for assistance related questions and accessibility of the airport. **22 out of 38 airports provide this information to the passenger.** 🔍 See [annex 10](#)

As an example of good practice, **Sofia Airport** allows the passenger to request airport assistance via their website through an online form.³⁴ Additionally, it has published the e-mail and phone number of assistance services for any inquiry. Similarly, **Barcelona and Madrid airports** also allow passengers to book assistance directly with them via mobile app, over the phone, e-mail or through an online form.

Other airports like **Tallin**³⁵ and **Helsinki**³⁶ provide only a phone number for specific services (like picking up at parking or public transport station) or general inquiries. Although the intention can be good, this option is not accessible, as passengers with hearing or speech impairments might not be able to use them.

34 Sofia Airport, Special Assistance. Retrieved 18 March 2025, <https://sofia-airport.eu/en/at-the-airport/services/special-assistance/>

35 Tallin Airport, Traveling with reduced mobility. Retrieved 18 March 2025: <https://airport.ee/en/travelling-with-reduced-mobility/>

36 Helsinki Airport, Services for persons with disabilities and reduced mobility. Retrieved 18 March 2025: <https://www.finavia.fi/en/airport/services-for-persons-with-disabilities-and-reduced-mobility?navref=main>

Airport Quality Standards

Airports with more than 150,000 passengers per year must adopt Quality Standards for the provision of assistance to persons with disabilities or reduced mobility (Article 9 of Regulation 1107/2006). While some small regional airports could be excluded from this obligation, all the airports located in the capital or biggest city of all EU Member States are covered, as even smaller airports have considerable traffic. By way of example, in 2023 Luxembourg Airport carried 4.7 million passengers and Ljubljana airport carried 1.2 million the same year.³⁷

The standards set goals that must be reached when providing assistance to passengers, including expected waiting times and passenger satisfaction with the services.

The Quality Standards are binding on the airports and must be published. Airports must cooperate with organisations of persons with disabilities when setting the Quality Standards. National Enforcement Bodies should take necessary measures to ensure compliance with such Standards.³⁸

12 out of 38 airports

have not published the Service Quality Standards on their website³⁹.

37 Eurostat, Air Passenger Transport Statistics 2024. Retrieved 10 March 2025. https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Air_passenger_transport_statistics

38 See Article 14(1) of Regulation 1007/2006.

39 Although Regulation 1107/2006 does not specify that Service Quality Standards should be published on the website, this is, in practice, the place in which passengers can access it more easily.

Publication of Service Quality Standards in website	
Not Published	Charleroi (BE), Tallin (EE), Heraklion (GR), Luxembourg (LU), Amsterdam (NL), Bratislava (SK), Ljubljana (SL), Milan Malpensa (IT), Rome (IT), Zagreb (HR), Paris Charles de Gaule (FR), Frankfurt (DE)
Published	Vienna (AT), Brussels (BE), Prague (CZ), Copenhagen (DK), Barcelona (ES), Madrid (ES), Helsinki (FI), Athens (GR), Bucharest (RO), Budapest (HU), Vilnius (LT), Riga (LV), Malta (MT), Eindhoven (NL), Lisbon (PT), Porto (PT), Stockholm Arlanda (SE), Goteborg (SE), Cluj (RO), Warsaw (PL), Krakow (PL), Dublin (IE), Nice (FR), Munich (DE), Larnaca (CY), Sofia (BG)

Among those that have published the Service Quality Standards, there are different practices. Some airports, such as Barcelona and Madrid, indicate clearly where to find such standards. Others, such as Brussels, Goteborg and Stockholm Airports, have published them in a way that is difficult to find.

For example, although there is a good level of detail, Stockholm Arlanda Airport has published them in the Q&A section under the heading 'waiting times'.⁴⁰ Brussels Airport has also published in the Q&A section but without much detail.⁴¹ None of them indicates that they are Service Quality Standards required by Regulation 1107/2006.

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40 Swedavia Arlanda Airport, Special Needs. Retrieved 17 March 2025. <https://www.swedavia.com/arlanda/special-needs/>

41 Brussels Airports, Passengers with reduced mobility. Retrieved 17 March 2025. <https://www.brusselsairport.be/en/passengers/at-the-airport/passengers-with-reduced-mobility/faq>

Cooperation with organisations of persons with disabilities

Regulation 1107/2006 requires airports to cooperate with organisations of persons with disabilities (OPDs) to designate points to request assistance (Article 5, paragraph 1) and the adoption of service quality standards (Article 9 paragraph 1).

Although it is not an obligation, airports are also advised to cooperate in other areas, including in the development of training programmes and policies and evaluating the assistance services.⁴²

The initial findings show that, only **14 of 38 airports** seem to have some form of cooperation with National Disability Councils. 🔍 See [annex 12](#)

The airports that cooperate with National Disability Councils can be divided in two groups: those that have put in place structured cooperation mechanisms and those that cooperate on a more ad-hoc basis, depending on the needs.

Structured cooperation with National Disability Councils

Some countries cooperate with organisations of persons with disabilities at the national level. This is the case for **Denmark**, that has created an Aviation Disability Council bringing together representatives from disability organisations, large Danish Airports (including Copenhagen Airport), assistance services and airlines. The Council meets twice a year formally and contacts take place informally when needs arise.

42 European Commission Interpretative Guidelines (2025). Op. Cit. Footnote 36. Page 5

The **Netherlands, Finland, Belgium, Greece and Austria** have established cooperation frameworks at the airport level. For example, **Helsinki Airport** has a PRM Working Group that meets twice a year and includes representatives from the Finnish Disability Forum, the Finnish Federation of the Visually Impaired and the Finnish Association of People with Physical Disabilities 🔍 See [annex 13](#) for other examples.

Ad-hoc cooperation with National Disability Councils

In other countries, airports consult organisations of persons with disabilities on a less regular basis, mainly when needs arise. The intensity of such contacts depends on the country, ranging from close cooperation to sporadic contacts. Such type of cooperation exists for example in airports in **Latvia, Lithuania and Sweden**.

In **Lithuania**, Vilnius Airport cooperates with the National Disability Council when changes are introduced. Among others, the Airport consults about the implementation of accessibility principles, relevant legislation and the quality of assistance services. Airport authorities are open to cooperation when the National Disability Council makes a request 🔍 See [annex 12](#) for other examples.

No cooperation with National Disability Councils

Some National Disability Councils confirmed the minimal or even lack of cooperation with their airports. This includes, **Bulgaria, Malta, Luxembourg, Hungary, Romania, Slovenia and Estonia**. In the **Netherlands and Belgium**, no cooperation exists with Eindhoven (Netherlands) and Charleroi (Belgium) Airports.

National Disability Councils in **Portugal** and **Sweden** mentioned that they do not cooperate directly with the airports in their country but that this does not exclude the possibility that local disability organisations do. This could be the case for other airports covered by this report and National Enforcement Bodies should verify if this is the case or not.

Digital accessibility

Accessibility of airlines and airports' websites and mobile apps is key for passengers with disabilities to access relevant information, assistance provision, meeting points for assistance, EU passenger rights and complaint procedures.

The European Accessibility Act will require airports and airlines to make their websites accessible to persons with disabilities by 28 June 2025. Although this report was written a few months before this deadline, the findings suggest that there was still work to do to meet the requirements of the Act.

A full accessibility audit would require extensive tests performed by accessibility experts in cooperation with users with disabilities. While we did not manage to undertake them, computer science students from the University of Lisbon ran automatic tests of the airline websites with the tool Qual Web⁴³. This tool can only provide some preliminary evidence by indicating when websites are clearly inaccessible.

When it comes to airlines websites, **ITA Airways, SAS, Transavia, Finnair, Iberia, Aer Lingus** and **Aegean** had a relatively good performance in the tests, but this does not mean that their pages are fully accessible.

43 Qualweb (<https://qualweb.di.fc.ul.pt/evaluator/>) is an accessibility evaluation service able to automatically check a webpage against a set of [WCAG 2.1 Techniques](#) and [ACT Rules](#). While Qualweb can check if a website is inaccessible (fails certain success criteria) it can not check if a website is accessible. For example, Qualweb can tell if an image has alternative text or not. When available, it cannot check if the information provided is meaningful to the user.

Those of **Croatia Airlines, Bulgaria Air, Brussels Airlines, Brattheens, Malta Airlines, Smart Wings** and **Luxair** performed worse.⁴⁴

Some barriers found on their websites include:



Lack of sufficient contrast between the text and the background.



Links with identical text but with different destinations making it unclear to users, especially those using screen readers, what a specific link will do.



Lack of text alternatives to information provided via images and audio.



Lack of resize text options, preventing users from enlarging text or enlarging it in a manner that is difficult to read.

Although, the availability of an accessibility statement⁴⁵ only indicates some level of accessibility awareness and does not mean that a website accessible, it is worth noting that few websites provided them.

Only **8 out of 30 airlines** reviewed provide an accessibility statement. 🔍 See [annex 13](#)

Only **9 out of the 38 airports** analysed provide had an accessibility statement. 🔍 See [annex 14](#)

44 For specific results of the test, please contact the author of the report.

45 The Accessibility Statement is a requirement of the Web Accessibility Directive. The statements should provide an explanation on the parts of the website that are not accessible, a feedback mechanisms to notify inaccessible content and information on enforcement procedures, among others. The Web Accessibility Directive only applies to the websites and apps of public sector bodies and it does not necessarily apply to airlines or airports (except if publicly owned).

Infringements of the legislation by airlines

So far, this chapter has shown how the existing gaps in Regulation 1107/2006 have led to a situation in which airlines can claim compliance with existing rules while applying different, and even contradictory, safety restrictions and transparency requirements. However, the website review has also revealed that some airlines simply do not comply with their most basic obligations.

Extended prenotification time for assistance

According to Articles 7 and 10 of Regulation 1107/2006, air carriers are obliged to provide assistance to passengers who notify them at least 48h ahead of the flight. However, some airlines apply longer prenotification times for assistance requests. This includes **Luxair** (72h)⁴⁶, **Bulgaria Air** (72h)⁴⁷ and **KM Malta** (72h).⁴⁸

Finally, the review has shown how prenotification time to travel with an assistance dog has been extended for specific routes, especially towards the United Kingdom. This includes **KLM** (96h)⁴⁹, **Air France** (96h)⁵⁰ and **Iberia** (72h)⁵¹.

46 Luxair, Passenger Assistance. Retrieved 15 May 2025: <https://www.luxair.lu/en/information/passenger-assistance>

47 Bulgaria Air, Passengers with special needs. Retrieved 15 May 2025: <https://www.air.bg/en/customer-support/passengers-with-special-needs>

48 KM Malta Airlines, Assistance. Retrieved 7 May 2025: <https://kmmaltairlines.com/en/assistance>

49 KLM, Service Dog, Retrieved 15 May 2025, <https://www.klm.be/information/assistance-health/service-dog>

50 Air France, Svan, Retrieved 15 May 2025, <https://www.airfrance.be/information/passagers/acheter-billet-avion-pmr-autres-handicaps/svan>

51 Iberia, Assistance Dog, Retrieved 15 May 2025, <https://www.iberia.com/be/en/assistance-dog/>

Denial of the right to travel with an assistance dog

While all flights departing from, on transit or arriving at airports in the EU should guarantee the right to travel with an assistance dog, some EU airlines do not accept assistance dogs in specific routes outside of the EU. This includes **EasyJet**⁵² (Egypt, Israel, Kosovo, Montenegro, Morocco and Turkey), **Ryanair**⁵³ (Morocco and Israel) and **LOT Airlines**⁵⁴ (United Kingdom and United Arab Emirates) even though the flights are departing/arriving at an EU airport and fall thus under the scope of the Regulation. **Braathens** does not accommodate assistance dogs at all.⁵⁵

Medical certificate

While airlines can request medical clearance for passengers with specific medical conditions, such as people with contagious diseases or women at late stages of pregnancy, passengers with disabilities must not be asked any type of medical information.

Bulgaria Air requires written authorisation from a medical doctor for those passengers 'whose ability to move freely or without assistance is impaired or difficult'.⁵⁶

KM Malta requires all passengers requesting full wheelchair assistance (WCHC) to submit a medical information form to be approved by the airline's specialist.⁵⁷

52 Easyjet, Special Assistance, Retrieved 15 May 2025, <https://www.easyjet.com/en/help/boarding-and-flying/special-assistance>

53 Ryanair Special Assistance, Retrieved 15 may 2025, <https://help.ryanair.com/hc/en-gb/categories/12489466690833>

54 LOT, Guidedogs, Retrieved 15 may 2025, <https://www.lot.com/be/en/journey/special-services/traveling-with-pets/guide-dog-and-esan>

55 Braathens, Health and Assistance, Service Dogs. Retrieved 8 May 2025, <https://charter.braathens.com/en/health-and-assistance/service-dogs/>

56 Bulgaira Air, same source as footnote 72

57 KM Malta Airlines, same as foot note 73.

Sky Express⁵⁸ may require medical attestation for certain disabilities, including wheelchair users or passengers with mental or developmental disabilities.

Charging for provision of assistance

While one of the basic principles of Regulation 1107/2006 is the provision of assistance free of charge, some airlines charge passengers for assistance requests. Currently, **KM Malta**⁵⁹ charges a 15 EUR fee for the processing and approval of the medical form that passengers requesting WCHC assistance⁶⁰ are obliged to submit.

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58 Sky Express, special assistance. Retrieved 15 May 2025: <https://www.skyexpress.gr/en/sky-experience/before-fly/special-assistance>

59 KM Malta, see footnote 73.

60 This typology of passengers is represented by the assistance code WCHC and refers to individuals who primarily, or exclusively, rely on a wheelchair for mobility.

Chapter 4:

Enforcement of Regulation 1107/2006



As we have seen in the previous chapter, legislation alone is not enough to guarantee that the provisions and rights established in law will be respected by those who must apply it. This is where enforcement comes in: a set of monitoring mechanisms and processes to ensure that laws are being complied with by the relevant parties.

Regulation 1107/2006 requires Member States to establish National Enforcement Bodies (NEBs) to ensure the correct implementation and compliance of passenger rights in the EU by airports, airlines, travel agents and tour operators¹. They can do so either by responding to passenger complaints or by proactively monitoring the airlines, airports and other actors under their responsibility.

Their activities, alongside the work carried out by Ombudsmen and Equality Bodies, constitute a form of non-judicial enforcement as the enforcement takes place outside the courts. The decisions of these bodies are not always binding on the parties involved and it may still be necessary to resolve legal disputes in court.

When the Regulation entered into force, Member States were able to delegate these enforcement tasks to one or multiple bodies and were given flexibility and discretion regarding the nature of the delegated authorities, their monitoring activities and powers.

These differences may result in passengers experiencing different outcomes when trying to solve an issue with an airline or airport operator depending on the place where the incident occurred and the NEB responsible for protecting their rights. In the following chapter we will provide some examples of this.

1 This regulation also applies to Iceland, Norway and Switzerland and, as a result, they have also established National Enforcement Bodies (NEBs). However, following the approach of previous Human Rights Reports, we have only focused on the 27 Member States.

Nature of NEBs decisions

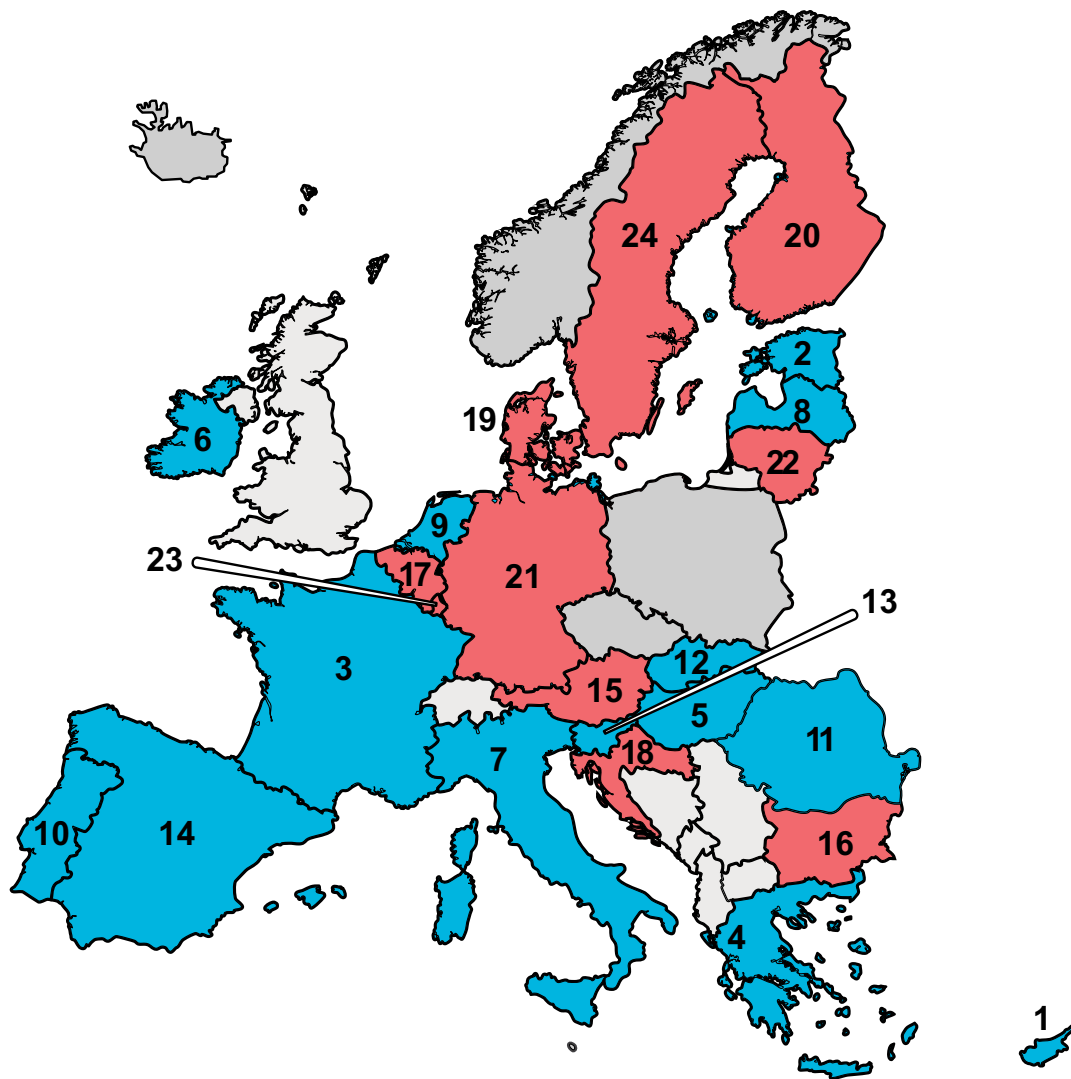
The ability of the national authorities to effectively enforce the Regulation is related to whether they have the power to issue binding decisions against transport operators in those cases when infringements of passenger rights have been identified.

When NEBs are unable to issue legally binding decisions, passengers who suffered a violation of their rights will need to consider alternative ways to seek redress, such as having to pursue a claim via the court system - a process that can be complex, time-consuming and costly.

Based on the information gathered for this report, there is no harmonised approach among Member States as not all of the authorities in the EU are able to make binding decisions on air carriers and airports for breaches of Regulation 1107/2006 (the same applies to Regulation 261/2004 cases²).

Unfortunately, the authors of the report could not get information from Malta, Czechia and Poland.

2 Except for the Danish NEB which is able to make binding decisions under Regulation 261/2004.



Fourteen NEBs can make binding decisions:

1. Cyprus
2. Estonia
3. France
4. Greece
5. Hungary
6. Ireland
7. Italy
8. Latvia
9. The Netherlands
10. Portugal
11. Romania
12. Slovakia
13. Slovenia
14. Spain

Ten NEBs cannot make binding decisions:

15. Austria
16. Bulgaria
17. Belgium
18. Croatia
19. Denmark
20. Finland
21. Germany
22. Lithuania
23. Luxembourg
24. Sweden

Financial penalties

In accordance with Article 16 of the Regulation, Member States must establish penalties for violations of the rules that “must be effective, proportionate and dissuasive”.

The threat of monetary fines is one of the strongest tools available for non-compliance, as it can have a tangible deterrent effect on businesses and lead to improved compliance with the law. This can happen provided that the penalties are significant enough to dissuade from acting against passengers’ interests.

NEBs can impose financial penalties as a result of inspections or investigations into passengers’ complaints, or when repeated non-compliance has emerged. For example:



Following its inspections of airports the Dutch NEB issued nine fines against Schiphol Airport Group in 2023 for violations of Article 5(1) of the Regulation on the designation of points of arrival and departure.³



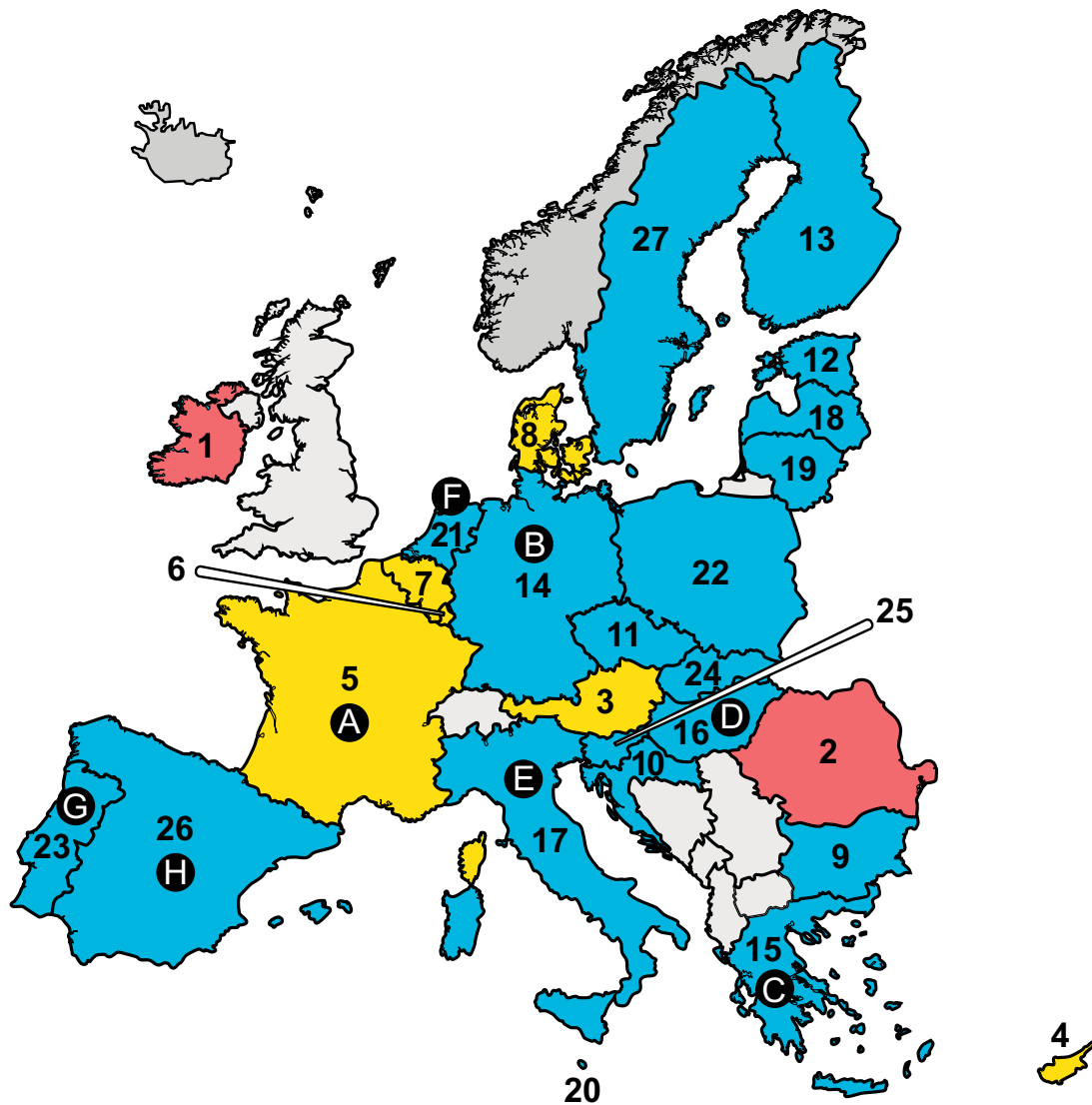
In 2023, the French Civil Aviation Minister imposed an administrative sanction worth €5,000 to the airport managing body Group ASP for failure to provide assistance.⁴

According to the information gathered for the report, and data published in a European Commission study on Regulation 1107/2006⁵, most of the enforcement authorities in the EU are able to impose financial penalties on transport operators that fail to comply with the Regulation.

3 Government Gazette of the Kingdom of the Netherlands, 3 fines airlines. Retrieved 15 October 2024: <https://zoek.officielebekendmakingen.nl/stcrt-2023-30698.html>

4 Ministère de l’Aménagement du territoire et de la décentralisation. Sanctions des compagnies aériennes pour non respect des droits des passagers . Retrieved 15 October 2024: <https://www.ecologie.gouv.fr/politiques-publiques/sanctions-compagnies-aeriennes-non-respect-droits-passagers>

5 European Commission (2021) Study on the EU Regulatory Framework for Passenger Rights. Part A, Evaluation of Regulation (EC) No 1107/2006 on the rights of persons with disabilities and with reduced mobility when travelling by air.



NEBs unable to impose fines:

1. Ireland
2. Romania

NEBs unable to impose fines directly, but able through a different authority:

3. Austria
4. Cyprus
5. France
6. Luxembourg
7. Belgium
8. Denmark

NEBs able to impose fines directly:

9. Bulgaria
10. Croatia
11. Czechia
12. Estonia
13. Finland
14. Germany
15. Greece
16. Hungary
17. Italy
18. Latvia
19. Lithuania
20. Malta
21. Netherlands
22. Poland
23. Portugal

24. Slovakia
25. Slovenia
26. Spain
27. Sweden

NEBs that have imposed fines in the past:

- A. France
- B. Germany
- C. Greece
- D. Hungary
- E. Italy
- F. Netherlands
- G. Portugal
- H. Spain

Despite the majority of NEBs having the power to impose financial sanctions on businesses that fail to uphold passenger rights, only a minority have taken up this action over the years.

Some of the authorities consulted for this chapter explained that they cannot apply sanctions directly but need to make a request to other bodies.



Denmark: the Danish NEB needs to ask the police to intervene and file charges against carriers or airport managing bodies.

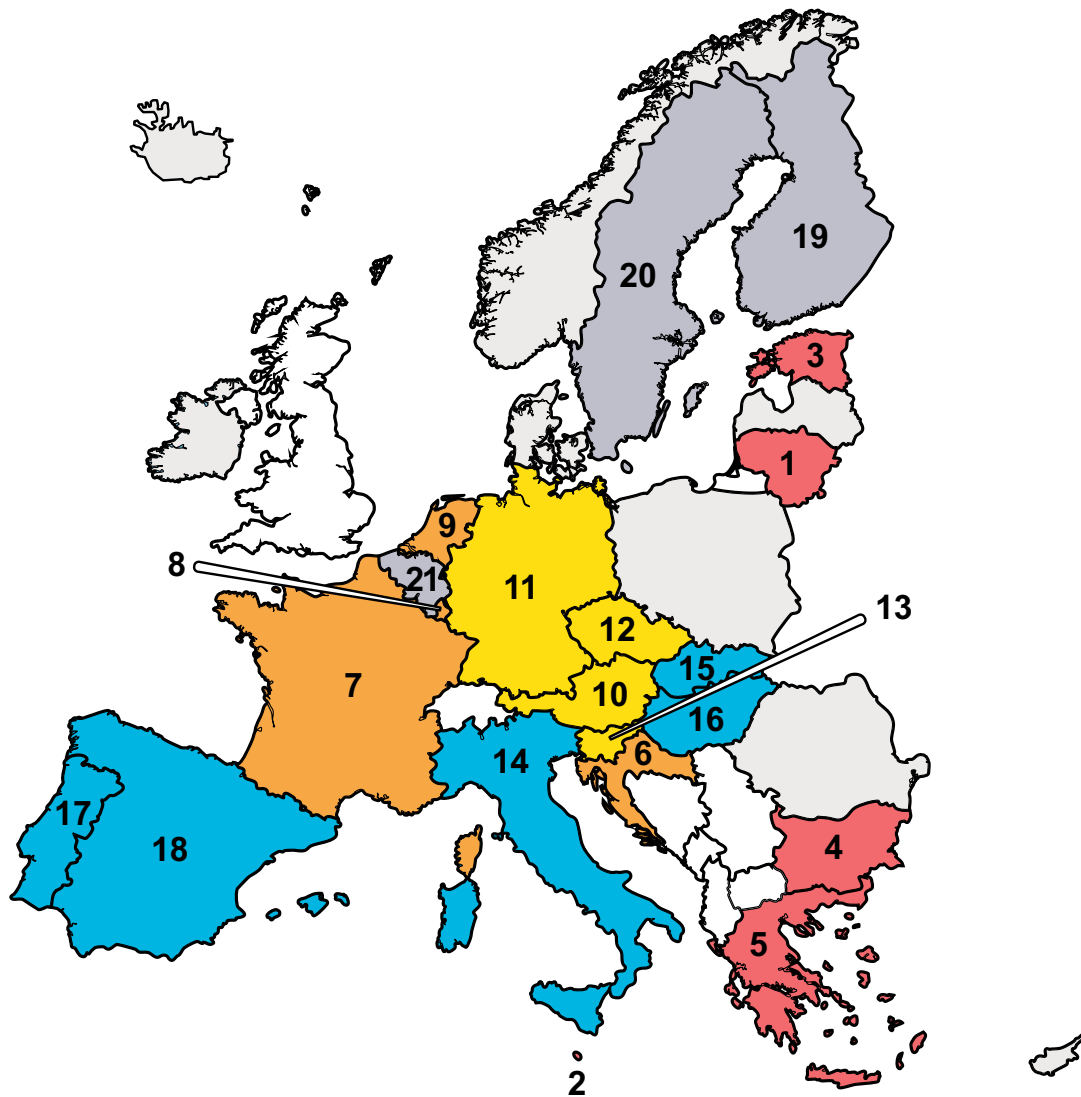


France: the French NEB can refer infringement cases to the Administrative Commission of Civil Aviation, which is composed of members from the State, professionals from the air travel sector and passenger representatives. Then, the Administrative Commission investigates potential infringements and makes recommendations on financial penalties for the approval of the Civil Aviation Minister.



Austria: in case of non-compliance with the law, the Austrian NEB can file a report to the competent district administrative penal authority, which decides whether to issue a penalty and determines the amount.

The level of sanctions available vary considerably between Member States, with maximum penalties ranging from as little as €860 (Lithuania) to €4,500,000 (Spain). In the majority of Member States that have the power to impose financial penalties, fines are set within a minimum and maximum range depending on the type of violation in question, while in a few other cases, NEBs have access to fixed penalties.



<p>€0 - €5,000</p>	<ol style="list-style-type: none"> 1. Lithuania - €300 to €860 2. Malta - €232.94 to €2,329.37 3. Estonia - €3,500 4. Bulgaria - €1,000 to €5,000⁶ 5. Greece - €200 to €5,000⁷
<p>€5,000 - €10,000</p>	<ol style="list-style-type: none"> 6. Croatia - €398 to €6,640 7. France - €7,500⁸ 8. Luxembourg - €2,500 to €10,000 9. Netherlands - €3,000 to €10,000

6 Approximate amounts based on BGN 2,000 to BGN 10,000 converted to euros.

7 Amount under revision

8 Sanctions can be doubled in case of repeated non-compliance.

€10,000 - €60,000	<p>10. Austria – up to €22,000</p> <p>11. Germany – up to €30,000</p> <p>12. Czechia - approximately €38,000</p> <p>13. Slovenia - up to €60,000</p>
€60,000 and over	<p>14. Italy - €2,500 to €120,000</p> <p>15. Slovakia – €66,000 maximum and rising to €166,000⁹</p> <p>16. Hungary - up to €248,120¹⁰</p> <p>17. Portugal - €6,000 to €400,000</p> <p>18. Spain - €4,500 to €4,500,000</p>
No information on fine amounts	<p>19. Finland - the level of fines is based on national law (Act 1113/1990)</p> <p>20. Sweden – no set levels</p> <p>21. Belgium – no information</p>

Monitoring tasks

NEBs undertake different activities to monitor the application of air passenger rights on the ground, and to ensure effective compliance with the provisions contained in the Regulation. Monitoring activities can include inspections, audits, as well as active oversight of passenger complaints to identify issues that need further investigation.

The information received seems to indicate that most NEBs supervise the application of the Regulation through physical

⁹ Fines up to €166,000 can be applied for repeated non-compliance

¹⁰ Approximate amount based on 100 million HUF converted to euros.

inspections of airlines and airports, which can be scheduled or unannounced, and through regular audits to verify compliance with accessibility requirements. In some cases, the activity of NEBs may be reliant on questionnaires sent to airports and airlines on an annual or bi-annual basis.

There are no specific requirements in the Regulation on the frequency and nature of the inspections by the enforcement authorities. Therefore, the NEBs' resources, expertise and appetite will determine how they perform these monitoring tasks.

For example, the Italian NEB explained that their annual physical audits of airports involve an assessment that encompasses the different parts of the passenger's journey. This includes an evaluation of airport facilities and infrastructure, including parking spots, dedicated equipment employed by the PRM assistance team (ambulifts, toilets, wheelchairs, PRM lounges and waiting rooms, procedures). The NEB also evaluates the training delivered to staff and verifies the quality of the training materials.

Some NEBs, such as the Austrian APF, Bulgarian CAA, Finnish Traficom, German LBA and Portuguese ANAC, also conduct evaluations of airports and airlines' websites content or analysis of the transport operators' terms and conditions. Through this monitoring work, they may provide guidance and recommendations to airport operators and air carriers on best practices to improve their compliance with the law or impose penalties when non-compliant behaviours are identified.

As part of their enforcement activities, NEBs such as the Italian ENAC and Portuguese ANAC are able to collect performance data from airports on the quality of PRM assistance. In the specific case of the Italian ENAC, the NEB requires airport operators to collect and publish data on performance indicators and targets relating to PRM assistance services in the form of annual "service charter" reports.¹¹

11 Available here: <https://www.enac.gov.it/aeroporti/qualita-dei-servizi-aeroportuali/carte-dei-servizi-dei-gestori-aeroportuali>, retrieved 29 August 2025.

Alongside regular actions aimed at monitoring specific provisions of the Regulation, several NEBs also engage in dialogue with the industry as a way of supervising the application of passenger rights but also to provide information and guidance, such as through workshops and training sessions.

In some cases, NEBs may rely predominantly on passengers' complaints as a means of supervising the application of the Regulation. However, as the number of complaints submitted to the authorities for Regulation 1107/2006 violations tends to be low, there is a risk that potential infringements are overlooked without appropriate supervision of airports and air carriers' facilities and the assistance provided to passengers on the ground.

Staff

Member States should guarantee that NEBs are adequately staffed to carry out their activities, including raising awareness of passengers' rights, monitoring air carriers and airports' compliance with the rules and dealing with passengers' complaints.

When it comes to the structure of NEBs, most Member States have staff dedicated exclusively to the enforcement of Regulation 1107/2006. Latvia, Finland, Cyprus and Croatia have staff that dedicate only a part of their work to its enforcement and Germany, Hungary and Belgium have staff dedicated to enforcement of both Regulation 1107/2006 and 261/2004.

It is difficult to compare the Member States in terms of NEB staff due to their differences in size, resources and air transport predominance. However, it is worth noting that while some countries devote significantly more resources to the enforcement of Regulation 261/2004 (Austria, Denmark or Spain) others seem to follow a more balanced approach to enforcement of Regulations 261/2004 and 1107/2006.

NEB¹²	Staff resources assigned to Regulation 1107/2006	Staff resources assigned to Regulation 261/2004
1. Austria	2 persons (NEB) 1 person (ADR)	10 persons (enforcement and arbitration)
2. Bulgaria	2 persons	2 persons
3. Belgium	3 persons for both regulations	
4. Croatia	4 persons (part of the working day)	4 persons (part of the working day)
5. Cyprus	3 persons (not working exclusively on the Regulation)	No information
6. Denmark	1 person	17 persons
7. Estonia	1 person	1 person
8. Finland	0,5 person (PRM matters across all transport modes)	1 person
9. Greece	2 persons	3 persons
10. Germany	12 persons working on both Regulations	

12 Data provided voluntarily to EDF consultant by NEBs between October 2024 and February 2025.

NEB¹²	Staff resources assigned to Regulation 1107/2006	Staff resources assigned to Regulation 261/2004
11. Hungary	3 persons working on both Regulations at Hungarian CAA. No information for Commissioner for Fundamental Rights Office.	
12. Ireland	2 persons	7 persons
13. Italy	5 persons	5 persons
14. Latvia	2 persons (10% of their workload)	No information
15. Lithuania	2 persons	3 persons
16. Luxembourg	1 person	No information
17. Romania	1 person (at NAPRPD ¹³)	No information
18. Slovakia	1 person	1 person
19. Slovenia	1 person	1,3 persons
20. Spain	5 persons	47 persons

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Cooperation with organisations of persons with disabilities

While Regulation 1107/2006 contains provisions requiring airports to engage and consult with organisations of persons with disabilities and persons with reduced mobility groups (Articles 5(1) and Article 9), there is currently no equivalent obligation on NEBs.

However, the European Commission¹⁴ recommends NEBs to establish formal frameworks of cooperation with representatives of persons with disabilities, or to create advisory boards to guarantee passenger representation and input.

Based on the information provided by NEBs, few Member States have formal systems for ensuring participation and feedback from disability organisations.

3 Member States have established advisory boards with groups passengers with disabilities:



Denmark: The Danish NEB created an aviation disability council - The Danish Disabled People's Air Travel Council – to establish a close dialogue with carriers and airport providers. The NEB reports that the Council meets twice a year with participation from the Disabled Peoples Organisation Denmark (DPOD), travel agencies, airport operators and industry representatives.¹⁵



Ireland: The Irish NEB has established a passenger advisory group (PAG) which includes a member group for persons with disabilities. The NEB also reports having regular engagement with disability organisations.

14 European Commission Interpretative Guidelines (2025). Op. Cit. Footnote 36. Page 32.

15 Danish Civil Aviation and Railway Authority, your rights as a disabled passenger, Retrieved 20 October 2024. <https://www.en.flypassager.dk/persons-with-reduced-mobility/your-rights-as-a-disabled-passenger>



Italy: The Italian NEB set up the Italian Disability Advisory Board which, among other things, organises educational webinars for tour operators and travel agents. Members of the Board include the main national disability associations, IATA, airport managing bodies, airlines, tour operators and travel agencies, and the Ministry for Disabilities. Also, each airport is required to consult with a disabled passenger group at least once a year on new projects to improve accessibility and quality of assistance at airports.

Ten NEBs report collaborating with disability organisations, including:



France: the Direction générale de l'Aviation civile (DGAC) maintains a constructive dialogue and holds one meeting a year. DGAC reports that it is integrated in the formal framework of cooperation with organisations of persons with disabilities at the State level.



Greece: The Hellenic Civil Aviation Authority (HCAA) have signed a Memorandum of Cooperation with the National Confederation of People with Disabilities. Also, the NEB works closely with the National Action Plan for People with Disabilities, a strategic framework designed to promote the rights and social inclusion of people with disabilities.



Germany: the German enforcement body Luftfahrtbundesamt (LBA) participates in regular dialogues between the German aviation businesses and disability organisations, such as the German Disability Council DBR and the German National Association of Senior Citizens' Organisations BAGSO, though the work coordinated by the German Aviation Association (BDL).¹⁶

¹⁶ Available here: <https://www.bdl.aero/en/topics/flight-operations/accessibility/>, retrieved 29 August 2025.



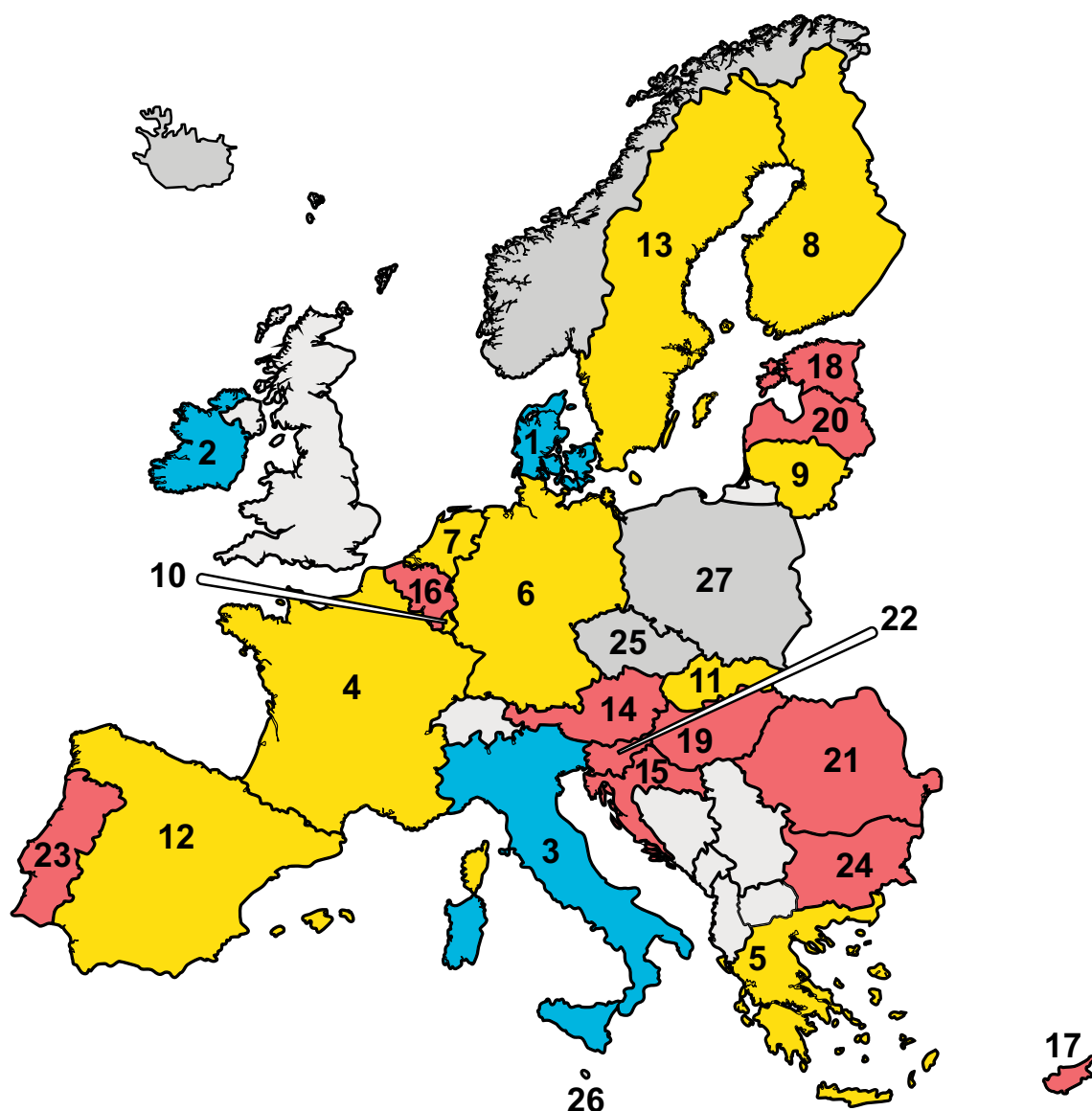
The Netherlands: the NEB Human Environment and Transport Inspectorate (ILT) organises workshops with organisations of persons with disabilities.

Finland, Lithuania, Luxembourg, Slovakia, Spain and Sweden have provided no detail on how they collaborate with disability groups.

Eleven NEBs confirmed the lack of formal collaboration with disability organisations, including: Austria, Croatia¹⁷, Belgium, Cyprus, Estonia, Hungary, Latvia, Romania, Slovenia, Portugal, while the Bulgarian NEB stated that it rarely engages with disability groups.

No information was received from the following Member States: Czechia, Malta and Poland.

¹⁷ Although the Croatian NEB reports holding two workshops a year on Regulations 1107/2006 and Regulation 261/2004 with participants from airports, airlines and organisations of people with disabilities and reduced mobility.



**■ NEBs with
Disability
Advisory
Boards:**

1. Denmark
2. Ireland
3. Italy

**■ NEBs that
collaborate
disability
organisations:**

4. France
5. Greece
6. Germany
7. Netherlands
8. Finland
9. Lithuania
10. Luxembourg
11. Slovakia
12. Spain
13. Sweden

**■ NEBs with no
collaboration
with disability
organisations:**

14. Austria
15. Croatia
16. Belgium
17. Cyprus
18. Estonia
19. Hungary
20. Latvia
21. Romania
22. Slovenia
23. Portugal
24. Bulgaria

**■ NEBs for
which there is
no information:**

25. Czechia
26. Malta
27. Poland

Information on alternative options to seek redress

We noted that only a minority of NEBs websites mention Alternative Dispute Resolution bodies (ADR) as a route to solve a complaint with an airline or airport. This may also be due to the lack of compensation provisions in Regulation 1107/2006, which does not currently establish financial redress for persons with disabilities who are denied boarding for “safety reasons” or do not receive assistance - unlike for Regulation 261/2004 on compensation and assistance for delay, cancellation and denied boarding.

At present, only the Austrian, Spanish and Slovak NEBs act as ADR bodies for Regulation 1107/2006 complaints. In the majority of Member States there are no sector-specific ADR bodies that deal with aviation complaints. This is reflected in the list of ADR bodies contained in the European Commission’s dedicated website – there is no reference to disabled air passenger claims and it is not clear which bodies are specialised in air passenger claims.

We also considered whether NEBs offer information on Equality Bodies in the respective member states as an additional route for passengers to report cases of discrimination. We found that only the Austrian NEB APF provides information on the Austrian Equality Body and their arbitration board for cases of possible discrimination as defined in the Federal Act on Equal Opportunities for Persons with Disabilities. Also, in Hungary, the body responsible for handling Regulation 1107/2006 complaints, the Commissioner for Fundamental Rights Office, is in fact an Equality Body.

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NEBs assessment on Regulation 1107/2006

As part of the report, we asked NEBs for their views on the enforcement of Regulation 1107/2006 and what areas should be prioritised for review.

The topics that they raised include:



Lack of guidance and clarity of the legal definition of the **“safety reasons”** for refusing boarding, for limiting the number of disabled passengers allowed on a flight and for restricting the carriage of mobility equipment.



The need to establish common guidelines and legal definitions on **“recognised assistance dogs”**.



Need to create common standards for **airports’ accessibility** and more effort to improve **training of staff and communication** to passengers throughout each step of the passenger journey, from booking to arrival at the destination, as there are often issues related to the quality of assistance services provided by airlines and airports that need be addressed.



Ensuring the appropriate level of compensation in the event of **damage or loss** of the passenger’s mobility equipment beyond the limits currently set under the Montreal Convention.



Stronger provisions that reflect the needs of disabled passengers when it comes to the **allocation of seats** and the procedures for embarkation and disembarkation, to create a more consistent approach and stronger best practice guidelines. Similarly, NEBs highlighted the need of a system for airlines to offer free seats for accompanying passengers or seats with extra legroom as mentioned in the revised Interpretative Guidelines of the Regulation.



Improved structures and mechanisms to ensure air carriers and airports effectively collaborate and engage with organisations of persons with disabilities on multiple areas covered by the Regulation.



Need for guidance on the **type of equipment** that can be carried on flight without incurring additional costs. This includes electric medical equipment with batteries, which can raise safety concerns by the airlines and prevent passengers to travel.



Requirements on airlines to carry **on board wheelchairs**.



The need to ensure **travel agents** and **tour operators** are complying with the Regulations.¹⁸



The NEB's ability to enforce compliance with the Regulation and to initiate enforcement proceedings against transport operators can be constrained by **jurisdictional limitations**. A common concern raised by several of the authorities we engaged with is that NEBs struggle to apply and enforce sanctions and administrative procedures on airlines that are registered in a different country.

¹⁸ In fact, we noticed that only a few NEBs mention on their websites that travel agents are also responsible for ensuring the rights of disabled passengers are respected (France, Ireland, Netherlands NEBs), and even fewer do so in their complaint forms (Cyprus NEB). In this regard, Member States should ensure that the NEBs are equipped with the relevant legislative measures to enforce the Regulation in those situations where the passenger does not book their flight directly with an airline.

Other differences between NEBs

Although it is not possible to cover them in the Human Rights Report, we also found notable differences among NEBs in the following areas:

- **Transparency of enforcement activities:** Although there is no obligation on NEBs to make this information available and accessible to passengers, there is still a number of NEBs who do publish information on enforcement powers, monitoring activities, sanctions and penalties for non-compliance. Those that do mainly publish it on their Annual Reports, which are not always easy to find. Few publish the information in their main pages. For example, out of the 27 NEBs analysed, only 7 publish information about their enforcement activities, sanctions applied, or complaints received. 🔍 See [annex 20](#)
- **Information on Regulation 1107/2006:** Not all NEBs provide passengers with information about their rights. While some NEBs have made an effort to explain them to the passenger, others just provide a link to the regulation. Out of the 27 NEBs analysed, 13 NEBs provide detailed information and 4 provide no or very limited information. 🔍 See [annex 21](#)

Passenger complaints to NEBs

According to available data, the level of passenger complaints related to Regulation 1107/2006 is low. In 2018, NEBs in the EU received less than 160 passenger complaints related to this regulation¹⁹ compared to the more than 120,000 complaints received in 2018²⁰ mainly related to Regulation 261/2004.

If we compare it with the United States (US), the Department of Transportation (DoT) received 828 related disability complaints the same year.²¹ In the US, airlines received 36,930 disability-related complaints in 2018.²²

The low level of passenger complaints in the EU has been used as an argument not to revise in depth Regulation 1107/2006.²³ EDF believes that this data does not mean passenger rights are generally upheld, but is the result of other reasons:

- Low passenger awareness on existing rights
- Low passenger awareness on NEB existence
- Inaccessible complain procedures
- Lack of incentives to complain

19 European Commission (2021) Study on the EU Regulatory Framework for Passenger Rights. Op. Cit. Footnote 9.

20 European Commission (2020) Study on the current level of protection of air passenger rights in the EU. <https://op.europa.eu/en/publication-detail/-/publication/f03df002-335c-11ea-ba6e-01aa75ed71a1>

21 Data gathered from the Air Travel Consumer Reports for 2018. Retrieved the 5 July 2025 on <https://www.transportation.gov/airconsumer/air-travel-consumer-reports-2018>. For November and December 2018, the data is available in 2019 reports. <https://www.transportation.gov/airconsumer/air-travel-consumer-reports-2019>

22 Annual report on disability-related air travel complaints received during calendar year 2018. Department of Transportation. Retrieved the 5 July 2025 on: <https://www.transportation.gov/sites/dot.gov/files/2020-03/Summary%20Report%20of%20CY2018%20Disability%20Complaints.pdf>

23 Response to EDF Letter Commissioners Vaele and Dalli (2023). Retrieved the 21 April 2023. <https://www.edf-feph.org/content/uploads/2023/06/signed-letter-Commissioners-Vaele-and-Dalli-.pdf>

Passenger awareness on existing rights

43% of the respondents to EDF survey claimed not being aware of their rights under Regulation 1107/2006.

This data is not surprising if we consider not all airlines and airports inform passengers about specific rights under Regulation 1107/2006 (11 out of 30 airlines and 8 out of 38 airports).²⁴

Airline information about regulation 1107/2006 (Website)	
Not available	KLM, Luxair, LOT, Aer Lingus, Sky Express, Transavia, Nyxair, Finnair, Bulgaria Air, Brussels Airlines, TAROM
Available	<p>Reference and link: TAP, Braathens, Air France, Eurowings, Air Baltic, SAS, Easy Jet, ITA,</p> <p>Only reference: Lufthansa, KM Malta, Iberia, Wizz Air, Aegean Airlines, Croatia Airlines, Austrian Airlines</p> <p>Only in term and conditions: Ryanair, Cyprus Airlines, Vueling, Smart Wings</p>

24 Regulation 1107/2006 does not oblige neither airports nor airlines to proactively inform passengers about their rights.

Airport information about regulation 1107/2006 (Website)	
Not available	Lisbon (PT), Amsterdam (NL), Porto (PT), Luxembourg (LU), Helsinki (FI), Charleroi (BE), Ljubljana (SL), Zagreb (HR)
Available	Eindhoven (NL), Malta (MT), Goteborg (SE), Stockholm Arlanda (SE), Riga (LV), Vilnius (LT), Budapest (HU), Athens (GR), Madrid (ES), Barcelona (ES), Tallin (EE), Copenhagen (DK), Prague (CZ), Brussels (BE), Vienna (AT), Bratislava (SK), Cluj (RO), Heraklion (GR) ²⁵ , Bucharest (RO), Warsaw (PO), Krakow (PO), Milan (IT), Rome (IT), Nice (FR), Dublin (IE), Paris Charles de Gaulle (FR), Munich (DE) ²⁶ , Frankfurt (DE), Larnaca (CY), Sofia (BG)

In addition, among those airlines and airports that do provide the information, the level of detail will range from just a mention of the Regulation to a detailed list of the specific rights and redress mechanisms available in case of non-compliance.

Good practice examples in informing passengers about their rights include EasyJet²⁷, ITA Airways²⁸ and Eurowings²⁹, that show a proactive and transparent approach in informing passengers about the carrier obligations and the complaint procedures 🔍 See [annex 16](#).

25 There is only a link to NEB website where information can be found.

26 Reference inside the service quality standards, difficult to find. <https://www.munich-airport.com/accessible-travel-260945>

27 Easy Jet, Special Assistance, Retrieved 12 March 2025 - <https://www.easyjet.com/en/help/boarding-and-flying/special-assistance>

28 ITA Airways, Reduced Mobility, Retrieved 12 March 2025 - <https://www.ita-airways.com/en/en/support/assistance/reduced-mobility.html?src=iconWheelchair>

29 Eurowings, Accessible Travel, Retrieved 12 March 2025 - <https://www.eurowings.com/en/information/on-board/accessible-travel.html>

Similarly, **Vilnius**³⁰ and **Milan Malpensa Airport**³¹ provide a link to the relevant European Commission website.

Passenger awareness on NEBs

Unless they are told, the majority of passengers do not know what National Enforcement Bodies (NEBs) are and how they can support them if they are not satisfied with the response given by airlines and airports to their complaints.

Only 5 out of 30 airlines and 22 out of 38 airports inform passengers about the existence of National Enforcement Bodies.³²

Airline information about National Enforcement Bodies (NEBs)	
Not available	KLM, Lufthansa, TAROM, Brussels Airlines, Easy Jet, Croatia Airlines ³³ , Bulgaria Airlines, Braathens, Finnair, Aegean Airlines, TAP, Cyprus Airlines, Wizz air, Nyxair, Iberia, Air France, Transavia, Sky Express, Aer Lingus, Ryanair, KM Malta, LOT, Luxair, Vueling, Smart Wings
Available	ITA Airlines, Austrian Airlines, SAS, Air Baltic, Eurowings

30 Vilnius Airport, Special Assistance, Retrieved 10 March 2025 - <https://www.vilnius-airport.lt/en/before-the-flight/special-assistance>

31 Milano Malpensa airport, Passengers with Reduced Mobility, Retrieved 10 March 2025 <https://www.milanomalpensa-airport.com/en/assistance/passengers-reduced-mobility>

32 Regulation 1107/2006 does not oblige airports and airlines to inform passengers about the existence of National Enforcement Bodies.

33 Reference in PAX section is not clear: <https://www.croatiaairlines.com/Legal-information/Passengers-rights>

Airport information about National Enforcement Bodies (NEBs)	
Not available	Porto (PT), Lisbon (PT), Eindhoven (NL), Luxembourg (LU), Riga (LV), Tallin (EE), Prague (CZ), Charleroi (BE), Brussels (BE), Bratislava (SK), Ljubljana (SL), Rome (IT), Dublin (IE), Paris Charles de Gaulle (FR), Munich (DE)
Available	Amsterdam (NL), Malta (MT), Vilnius (LT), Budapest (HU), Goteborg (SE), Stockholm Arlanda (SE), Heraklion (GR) ³⁴ , Athens (GR), Helsinki (FI), Madrid (ES), Barcelona (ES), Copenhagen (DK), Cluj (RO) ³⁵ , Warsaw (PO), Vienna (AT), Krakow (PO), Milan Malpensa (IT), Frankfurt (DE), Larnaca (CY), Sofia (BG), Nice (FR) ³⁶ , Bucharest (RO) ³⁷ , Zagreb (HR) ³⁸

Again, the fact that the information is provided does not mean that it is useful to or understandable by the passenger. While **Madrid and Barcelona Airports**³⁹ clearly indicate that the passenger can contact the National Enforcement Body if dissatisfied with their response, **Malta Airport**⁴⁰ provides it only in the passenger rights page without explaining what these Bodies do or if they enforce specific disability rights.

34 There is only a link to the NEB website where information can be found.

35 There is only a link to EU website where information can be found.

36 There is only a link to EU website where information can be found.

37 There is only a link to EU website where information can be found.

38 Difficult to find, as it the info is available in general Q&A Section and there is no reference to Regulation 1107/2006 (<https://www.zagreb-airport.hr/en/passengers/need-help/faq/travel-information/346>)

39 AENA Josep Tarradellas Barcelona el Prat Airport, Barrier free assistance. Retrieved 10 March 2025 <https://www.aena.es/en/josep-tarradellas-barcelona-el-prat/airport-services/barrier-free-assistance-service.html>

40 Malta Airport, Passenger Rights. Retrieved 10 March 2025 - <https://www.maltairport.com/passenger/services/passenger-rights/>

Inaccessible complaint procedures

As explained in the airlines and airports chapter, website accessibility is a key element to ensure an inclusive travel experience. When NEBs websites are not accessible, passengers with disabilities will not know that they can submit a complaint to them or be able to submit a complaint at all.

The automatic tests performed by the QualWeb tool provide strong evidence that not all NEBs websites meet the minimum accessibility requirements.

While, the websites of **Denmark, France, Ireland, Latvia, Netherlands, Slovakia, Spain** and **Sweden** performed better, those of **Bulgaria, Croatia, Cyprus, Italy, Malta** and **Slovenia** performed worse.⁴¹

As explained in the airlines chapter, better test results do not mean that their websites are accessible. To know this, a digital accessibility expert should audit their websites thoroughly.

It is worth noting that **6 NEBs** do not provide an accessibility statement on their website. As public authorities, they are bound by the requirements of the Web Accessibility Directive, which makes the use of such statements mandatory 🔍 See [annex 21](#).

The report also looked at the information NEBs provide to passengers wanting to submit a complaint to the national authority, and whether different options are available in an effort to suit the diverse needs of disabled passengers. We found that while some NEBs allow passengers to submit complaints using different means (e-mail, phone, post, on-line form) others limit it to one option. Few allow passengers to submit complaints using alternative formats such as braille or audio recording or even in person. In addition, not all NEBs explain the procedures, timelines and outcomes of making a complaint.

41 For the specific results, check EDF website or contact the authors of the report.

Lack of incentives to complain

While passengers are entitled to a monetary compensation under Regulation 261/2004 when disruptions occur (like delays or cancellations), persons with disabilities do not get any compensation when they do not receive appropriate assistance, when they are denied boarding because of their disability or when the travel information is not accessible under Regulation 1107/2006. When the wheelchair is broken, the compensation is limited and does not cover the full cost repair or replacement.

While NEBs might investigate a passenger complaint and request the carrier or airport to change behaviour and impose fines, there is no direct benefit for the passenger for discrimination and inconvenience caused. The only way passengers with disabilities can seek personal redress and get compensation is going to court, which is expensive and time consuming.

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Chapter 5:

Good practices in air travel



Air transport legislation in the United States

In the **United States** (US), the Air Carrier Access Act (ACAA) protects passengers with disabilities from discrimination in air transport. The Department of Transportation (DOT) is charged with its oversight and enforcement and has the capacity to adopt binding rules to develop and clarify the obligations of airlines under the ACAA.

Compared with Regulation 1107/2006, the ACAA grants passengers with disabilities greater rights, including full liability for mishandled mobility equipment in domestic flights¹, obligation to provide free of charge ticket to the accompanying person when required for safety reasons and against the will of the passenger², specific seating accommodations³ and limited application of prenotification requirements.⁴ For example, while in the EU passengers with disabilities always have to notify their intention to travel with wheelchair 48h in advance, in the US the passengers only need to do it on aircrafts with fewer than 60 seats.

US legislation also requires new aircraft to have accessible features. This includes movable aisle armrests on half of the aisle seats (if the aircraft has 30 or more seats)⁵; priority stowage space for wheelchairs in the cabin (if the aircraft has more than 100 seats);

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- 1 Code of Federal Regulations, Air Carrier Access Act. Do baggage liability limits apply to mobility aids and other assistive devices? Retrieved 3 March 2025 <https://www.ecfr.gov/current/title-14/chapter-II/subchapter-D/part-382/subpart-I/section-382.131>
 - 2 Ibid. May a carrier require a passenger with a disability to travel with a safety assistant? Retrieved 3 March 2025 <https://www.ecfr.gov/current/title-14/chapter-II/subchapter-D/part-382/subpart-B/section-382.29>
 - 3 Ibid. For which passengers must carriers make seating accommodations? Retrieved 3 March 2025 <https://www.ecfr.gov/current/title-14/chapter-II/subchapter-D/part-382/subpart-F>
 - 4 Ibid. May a carrier require a passenger with a disability to provide advance notice in order to obtain certain specific services in connection with a flight? Retrieved 3 March 2025. <https://www.ecfr.gov/current/title-14/chapter-II/subchapter-D/part-382/subpart-B/section-382.27>
 - 5 Ibid. What are the requirements for movable aisle armrests? Retrieved 3 March 2025 <https://www.ecfr.gov/current/title-14/chapter-II/subchapter-D/part-382/subpart-E/section-382.61>

an accessible lavatory (if the aircraft has more than one aisle)⁶ and the provision of an on-board wheelchair.⁷ More recently, the DOT has adopted binding rules aimed to make lavatories on new single-aisle aircraft accessible to passenger with disabilities⁸ and announced work on a future rule to ensure that passengers can remain in their wheelchair when flying.⁹

Another important prerogative of the DOT is to access all disability-related complaints received by US and foreign carriers operating to, from and within the US (including EU carriers). With this data, the DOT publishes a detailed report of the type of disabilities complaints received by each airline in a specific year.¹⁰

When it comes to enforcement, the DOT achieved an important landmark with its \$50 million fine against American Airlines for mishandling of mobility equipment and undignified treatment of wheelchair users. This fine, imposed in 2024, is the biggest enforcement action of air transport disability rights in the US, 25 times larger than the previous largest airline penalty.¹¹

6 Ibid. What are the requirements for accessible lavatories? Retrieved 3 March 2025 <https://www.ecfr.gov/current/title-14/chapter-II/subchapter-D/part-382/subpart-E/section-382.63>

7 Ibid. What are the requirements concerning on-board wheelchairs? Retrieved 3 March 2025 <https://www.ecfr.gov/current/title-14/chapter-II/subchapter-D/part-382/subpart-E/section-382.65>

8 US Department of Transportation (2023) U.S. Department of Transportation Requires Airline Lavatories to Be More Accessible for Wheelchair Users Accessible restroom – Retrieved 3 March 2025. <https://www.transportation.gov/briefing-room/us-department-transportation-requires-airline-lavatories-be-more-accessible>

9 US Department of Transportation (2023) U.S. Department of Transportation Announces that United Airlines Will Implement Industry-Leading Improvements for Passengers Using Wheelchairs. Retrieved 3 March 2025 <https://www.transportation.gov/briefing-room/us-department-transportation-announces-united-airlines-will-implement-industry>

10 US Department of Transportation, Reports and Data on Disability-Related Air Travel Complaints. Retrieved 3 March 2025 <https://www.transportation.gov/airconsumer/annual-report-disability-related-air-travel-complaints>

11 US Department of Transportation (2024). DOT Issues Landmark \$50 Million Penalty Against American Airlines for Its Treatment of Passengers with Disabilities. Retrieved 3 March 2025 <https://www.transportation.gov/briefing-room/dot-issues-landmark-50-million-penalty-against-american-airlines-its-treatment>

Air transport legislation in Canada

In **Canada**, air carriers cannot charge more than one ticket to passengers with disabilities travelling with their personal assistant in domestic flights.¹² This obligation, known as ‘One person one fare policy’ is part of the Accessible Transportation for Persons with Disabilities Regulation¹³, a rule developed by Canadian Transportation Agency under the Canadian Transportation Act.¹⁴

Although some Canadian airlines contested the measure in 2008, the Canadian Transportation Agency upheld it, arguing that they failed to demonstrate how such measure would impose an undue hardship on them. According to the Agency estimates, the one person one fare policy represented only 0.09 per cent of the total annual passenger revenue of an airline like Air Canada.¹⁵

While less ambitious than the Canadian case, there are private-led initiatives in other countries aiming at reducing the travel cost of passengers with disabilities. In Australia, Qantas adopted a ‘Carer Concession Card’ which grants card holders and their nominated carers discounts on their flights. This includes 30 per cent discount for domestic flights and 10 per cent discount on international flights¹⁶.

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- 12 Canadian Transportation Agency, Additional Seating and the One Person, One Fare Requirement for Domestic Travel: A Guide. Retrieved 4 March 2025 <https://otc-cta.gc.ca/eng/publication/additional-seating-and-one-person-one-fare-requirement-domestic-travel-a-guide>
 - 13 Canadian Ministry of Justice (2025) Accessible Transportation for Persons with Disabilities Regulations <https://laws-lois.justice.gc.ca/PDF/SOR-2019-244.pdf>
 - 14 Canada Transportation Act (1996). Retrieved on 4 March 2025, <https://www.canlii.org/en/ca/laws/stat/sc-1996-c-10/latest/sc-1996-c-10.html>
 - 15 Government of Canada (2008), Canadian Transportation Agency decides in favour of one-person-one-fare policy. Retrieved on 4 March 2025 <https://www.canada.ca/en/news/archive/2008/01/canadian-transportation-agency-decides-favour-one-person-one-fare-policy.html>
 - 16 Qantas, Qantas carer concession card. Retrieved in 4 March 2025, <https://pwd.org.au/services/qantas-carer-concession-card/>

Inclusive safety practices in AlbaStar Airlines

AlbaStar is a Spanish airline that offers on-demand flight services. Among others, the airline has specialised in pilgrimages and religious trips, offering connections to Lourdes sanctuary.¹⁷ These types of trips can involve the carriage of many PRM on board which, according to many airlines, could represent an important safety challenge.

However, AlbaStar demonstrated to air safety authorities that it is possible to evacuate under 90 seconds a full short-haul flight with 40 paraplegic passengers accompanied by their assistant. It must be noted that 90 seconds is the maximum time allowed for cabin evacuation in order to receive the air operation certificate.¹⁸

This experience shows how the evacuation of an aircraft can be quicker with the more PRM passengers are on board shows and that certain limitations applied by other carriers are based on misconceptions about disability and air safety.

17 AlbaStar, the company. Retrieved on 9 March 2025, <https://albastar.es/en/the-company/>

18 European Commission (2021) Study on the EU Regulatory Framework for Passenger Rights. Op. Cit. Footnote 74. Page 137.

Seeking redress through Equality Bodies

Equality Bodies are independent public organisations that play a central role in implementing, applying and enforcing EU and national equality law¹⁹ at the national level. Among others, equality bodies support victims of discrimination with independent assistance in pursuing their complaints, conducting independent surveys on discrimination and publishing reports and making recommendations – including for policy change – on the cases they deal with.²⁰

Although Equality Bodies are rarely mentioned in passenger rights discussions, their disability-related expertise and their capacity to provide support to victims of discrimination, including in judicial procedures, has made them an important ally for passengers with disabilities.

In **Ireland**, the Irish Human Rights and Equality Commission (IHREC) provided legal advice and representation to a passenger with disability who was not provided with reasonable accommodation in a flight. The passenger required a ventilator but the airline refused to carry it in the manner required by the passenger. Thanks to IHREC legal assistance, the matter was settled in favour of the client with the airline agreeing to facilitate the carriage of the passenger's ventilator and to pay compensation. The airline also agreed to provide updated equality training for staff and to include a reasonable accommodation statement in their website.²¹

19 The existing EU framework includes [Directive against discrimination on the grounds of race and ethnic origin](#) (2000), [Directive against discrimination at work on grounds of religion, belief, disability, age or sexual orientation](#) (2000), [Directive on equal treatment for men and women in matters of employment and education](#) (2006), [Directive on equal treatment for men and women in access to and supply of goods and services](#) (2004) as well as the [EU Charter on Fundamental Rights](#).

20 Equinet, what are Equality Bodies. Retrieved 9 March 2025. <https://equineteurope.org/what-are-equality-bodies/>

21 Irish Human Rights and Equality Commission, Annual Report 2022, page 21. Available at https://www.ihrec.ie/app/uploads/2023/06/IHREC_Annual-Report-2022_Final-Accessible.pdf

In **Finland**, the Non-Discrimination Ombudsman litigated in favour of a passenger who was denied reasonable accommodation by Finnair. The passenger, whose knee was immobilised after surgery, had been forced to buy three seats next to each other to be accepted on board. The passenger decided to sue the airline, and the case made it to the Supreme Administrative Court, which ruled in favour of the passenger. Given the nature of Finnair's business activities, the rarity of the disability and the fact that the passenger with disabilities had booked the flights well in advance, the Court held that the price reduction for the extra tickets could not be considered unreasonable by the airline. The court also held that Finnair failed to prove how the reduction of price granted to the passenger could affect the profitability of the flight as a whole or restrict the company's freedom of pricing in a disproportionate way. The legal basis for this ruling included the Finnish Discrimination Act, Regulation 1107/2006 and the United Nation Convention on the Rights of Persons with Disabilities.²²

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22 Finlex 2021, HFD:2021:189, Retrieved 13 March 2025
<https://finlex.fi/en/case-law/supreme-administrative-court/precedents/2021/189>

Chapter 6:

Recommendations



Recommendations to EU policy makers



Revise Regulation 1107/2006 to address existing gaps and align it with the UN CRPD. Issues to address include:

- Put an end to the cases of denied boarding based on disability and existing discretionary safety rules.
- Guarantee the full liability for mishandled mobility equipment.
- Provide effective redress and compensation to passengers when they are denied their rights under Regulation 1107/2006.
- Eliminate prenotification requirements to receive assistance.
- Strengthen the enforcement capacity of National Enforcement Bodies (NEBs).
- Guarantee the right for passengers with disabilities to travel with their personal assistant free of charge, following the example of Canadian legislation.
- Increase passenger awareness of applicable rights and available redress mechanisms.

Ensure the mutual recognition of assistance dogs throughout the EU. Assess the situation in each Member State and take action, including through legislation, as requested on EDF position paper on assistance dogs in air travel.¹

1 European Disability Forum (2025). Op. Cit. Footnote 29.

Establish minimum accessibility requirements for airplanes and airports. This could follow the example of the United States, which requires minimum accessibility requirements in planes. In the EU, such requirements already exist in rail transport, both for vehicles and infrastructure, thanks to the TSI-PRM Regulation.² When developing such accessibility requirements, special attention should be paid to wheelchair users and the possibility to remain in their mobility devices throughout the journey.

Publish EU-wide data on the assistance provided to persons with disabilities. Taking the example US Department of Transportation³, the European Commission should publish an annual report allowing passengers and public authorities in the EU to have an overview of the assistance provided to passengers with disabilities by airlines and airports and related complaints.

Collect survey data on the experience of passengers with disabilities in air transport. Dedicate a specific Eurobarometer Survey on passenger rights for persons with disabilities covering awareness on specific disability rights, existing barriers, impact of disruptions and experience with enforcement mechanisms. The survey should also aim at shedding light on passengers who, due to existing barriers, decide not to travel at all.

Create an EU-wide form for the transport of electric mobility equipment. Such form should allow passengers traveling with mobility equipment to always submit the same information regarding the characteristics of the mobility equipment, including the dimensions, weight and battery type.

2 European Railway Agency (ERA), Persons with Disabilities and with Reduced Mobility TSI. Retrieved 20 April 2025 (https://www.era.europa.eu/domains/technical-specifications-interoperability/persons-disabilities-and-reduced-mobility-tsi_en)

3 Available here: <https://www.transportation.gov/resources/individuals/aviation-consumer-protection/reporting-disability-related-complaint-data-2023>, retrieved 29 August 2025.

Create an EU template for airlines to inform passengers about their conditions to transport passengers with disabilities. Such template should be available in all airlines website and provide detailed and harmonised information on the specific transport conditions, safety restrictions, applicable rights and complaint procedures.

Recommendations to EU countries



Defend and promote disability rights in the passenger rights negotiations, including the 2023 enforcement and multimodal proposals⁴ and the 2013 proposal to revise Regulations 261/2004 and 2027/97.⁵

Strengthen NEBs, by making sure they are well funded, have enough staff, issue binding decisions, impose truly dissuasive fines and have adequate powers to carry out monitoring activities.

Fund organisations of persons with disabilities, so that they have the financial and human capacity to engage with Airlines, Airports and National Enforcement Bodies.

4 European Disability Forum (2024), New Proposals on Passenger Rights, what is in it for us? Retrieved 20 April 2025, <https://www.edf-feph.org/new-proposals-on-passenger-rights-what-is-in-it-for-us/>

5 Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EC) No 261/2004 establishing common rules on compensation and assistance to passengers in the event of denied boarding and of cancellation or long delay of flights and Regulation (EC) No 2027/97 on air carrier liability in respect of the carriage of passengers and their baggage by air, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52013PC0130>

Rectify the unjustified use of safety restrictions by airlines. Civil Aviation Authorities should use their leverage when approving the airlines air operator's certificate (AOC) to forbid any practice that discriminates against passengers with disabilities.

Recommendations to National Enforcement Bodies (NEBs)



Address cases of potential non-compliance by air carriers. This includes prenotification requirements over 48h, unnecessary medical certificates, assistance provision at a cost, limited rights for assistance dog handlers and lack of general information on the transport of passengers with disabilities.

Address cases of potential non-compliance by airports. This includes the lack of publication of service quality standards and lack of cooperation with organisations of persons with disabilities.

Engage with airlines to make their practices more inclusive. NEBs should discuss and rectify existing airlines practices, including the divergent requirements on the transport of mobility equipment and assistance dogs, the maximum number of passengers with disabilities on board and the lack of cabin wheelchair.

Establish cooperation mechanisms with organisations of persons with disabilities. This cooperation will provide first-hand experience on access to air transport, a better understanding of the main barriers and a platform to discuss solutions and reach out to the disability community.

Raise awareness on passenger rights. NEBs should offer comprehensive and easy to understand information on the main provisions of Regulation 1107/2006.

Improve complaint procedures. NEBs should provide more details on the complaint process, including on applicable deadlines, timelines and potential outcome of the process. In addition, NEBs should provide different contact options for passengers seeking support in submitting a claim and inform about alternative redress options, including on national equality bodies.

Make websites and mobile apps accessible. When doing so, NEBs should consider the latest Web Accessibility Guidelines ([WCAG 2.2](#)) which will soon be part of the Harmonised European Standard EN 301 549.

Increase transparency of enforcement and monitoring activities by publishing information on the complaints received, fines imposed, and monitoring activities carried out.

Recommendations to airlines



Voluntarily waive the limited liability for mishandled mobility equipment. All airlines should proactively compensate for the full cost of repair or replacement of mishandled mobility equipment instead of sticking strictly to what the law establishes.

Refrain from imposing passengers with disabilities a safety assistant against their will. As a general rule no airline should impose an accompanying person against the will of the passenger and should accept the determination of the passenger to be self-reliant. If an accompanying passenger is nevertheless required, the additional ticket should be provided free of charge.

Guarantee the right to travel with an assistant dog. While international credentials from International Guide Dog Federation (IGDF) and Assistance Dog International (ADI) can be a way to verify the training of the dog, national practices should be mutually recognised without exception.⁶

Buy accessible planes. Airlines should request inclusive and accessible aircraft designs, including large doors to board all type of passengers, hold doors that can load different types of mobility equipment, accessible boarding mechanisms, tactile signage (for example, for seat identification), accessible toilets, movable armrests, accessible on-board entertainment systems and screens and systems to convey real-time information through different sensory means. Airlines should request solutions so passengers can remain in their wheelchairs throughout the journey.

⁶ This is especially relevant for countries where no national practice exists, or no international credential can be provided

Provide cabin wheelchairs in all planes. The provision of these wheelchairs is a prerequisite to provide assistance to move from the seat to the cabin toilet. These wheelchairs should be provided by default in all flights, irrespective of distance of the journey.

Improve online booking processes. Airlines should offer dedicated contact lines for passengers with disabilities to ask relevant information. Such contact lines should be available without the need to buy a ticket, free of charge, allow for accessible means of communication and be available in multiple languages.

Streamline assistance requests. Passengers should be able to request assistance during the booking flow, instead of being asked to do it after purchasing the ticket by phone, form or e-mail. If additional information is needed, airlines should provide the passenger with different contact means and provide confirmation as soon as possible.

Simplify booking procedures for frequent flyers. For passengers traveling often with mobility devices or assistance dogs, airlines should simplify even more the processes and not require them to always submit the same documents before getting approval for flying.

Provide inclusive and dignified boarding and disembarking procedures. Passengers should be allowed to remain in their own wheelchair until the gate and receive it at the aircraft door upon arrival. They should also be guaranteed the option to be the first ones to board the plane and have access to their mobility devices during transfers, especially when long layovers are foreseen.⁷

7 Such procedures should be clearly established in the Operations Manual.

Improve staff training. The trainings should provide all airline staff with an understanding of the barriers that passengers with disabilities face in air travel, the operation procedures for their transport (including assistance dogs, mobility equipment and batteries) and their rights under relevant legislation. The training should be designed and delivered in cooperation with organisations of persons with disabilities.

Cooperate with organisations of persons with disabilities. This cooperation will help improve airlines services, understand customer expectations, find potential solutions and resolve complaints. As experts of their lived experience, persons with disabilities should be paid accordingly.

Make websites and mobile apps accessible, as required by the European Accessibility Act. When doing so, airlines should consider the latest Web Accessibility Guidelines ([WCAG 2.2](#)) which will soon be part of the Harmonised European Standard EN 301 549.

Provide comprehensive disability and accessibility information on the website. Airlines should always publish information about any limitations due to the size of the aircraft, situations where the accompanying person is required, lack of accessible toilets and movable armrests, availability on board wheelchair, information on the transport of medical equipment, mobility devices and assistance dogs, passenger rights legislation, contact of the assistance team and details on how to complain. This information should be available one click away from the main page, with clear labels such as 'special assistance' or 'travelling with a disability and reduced mobility'.

Offer affordability measures for passengers with disabilities.

Airlines should explore ways to reduce the disproportionate costs that some passengers with disabilities still face when traveling by air. This could include important discounts for passengers travelling with their personal assistant, adjacent seating for the accompanying person at no extra cost or extra seat for the passenger traveling with a large assistant dog.

Recommendations to airports



Guarantee accessibility of airport infrastructure. This includes accessible means of transport to reach the airport, parking spaces for persons with disabilities, easy to navigate airport layouts, clear signage, accessible lifts, tactile guiding systems, accessible toilets, changing spaces, accessible facilities, animal-relief areas and accessible information systems that convey information using different sensory channels. As more travel processes become digitalised, attention should be paid to the accessibility of devices used for security checks, e-gates and other self-service terminals and equipment. Some of these elements are covered by the European Accessibility Act and its accessibility is already a legal requirement.

Provide quality assistance services. Airports should prioritise quality over cost when procuring third party PRM party assistance. Proper disability-awareness training, adequate pay and good working conditions for assistance staff are important elements that also contribute to the overall quality of the service.

Make sure that assistance services have the right assistive equipment. PRM assistance services should use appropriate wheelchairs for assistance provision, ambulifts instead of stair climbers for boarding and disembarking procedures and adequate devices for transfers to plane seats.

Offer the contact details of assistance services in their website. While assistance is requested through the airline, this information would allow the passengers to request information on airport accessibility, transport options or transfer times.

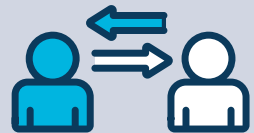
Establish cooperation mechanisms with organisations of persons with disabilities. Although airports are only required to consult with such organisations to adopt service quality standards and designate the points to request assistance, they should also consult them in other areas, including assistance tenders, performance against service quality standards, passenger complaints, relevant initiatives (including construction works) and implementation of accessibility rules.

Training of airport staff. This training should target ground handling personnel on how to deal with mobility devices, security and border officers on how to carry out security checks in a dignified manner and shops and restaurants on how to offer accessible services. The training should be delivered on a recurrent basis, take into account the specificities of each job and be designed and delivered in cooperation with organisations of persons with disabilities.

Make websites and apps accessible, as required by the European Accessibility Act. When doing so, airports should consider the latest Web Accessibility Guidelines ([WCAG 2.2](#)) which will soon be part of the Harmonised European Standard EN 301 549.

Provide comprehensive disability and accessibility information on the website. Among others, there should be clear information on assistance provision, points to request assistance in the airport, service quality standards, accessible contact information of assistance services, applicable passenger rights regulations, complaint mechanisms, including relevant National Enforcement Bodies. Airports should also explain and provide the contact of the organisations of persons with disabilities they cooperate with and the accessibility of the infrastructure.

Recommendations to intermediaries



Intermediaries must be aware of the existing legal framework as well as their responsibilities in arranging the right assistance.⁸

Intermediaries should receive adequate training to provide the necessary information to passengers with disabilities, request the right information from them and notify airlines assistance requests in an appropriate manner.

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⁸ While passengers can book their flights directly to airlines, sometimes they rely on intermediaries to do so. This can include tour operators, travel agencies and booking platforms such as eDreams or Kiwi.

Closing words



Gunta Anca

EDF Vice president

As a long-time user of an electric wheelchair, I know well the challenges that come with air travel. Every journey is a careful calculation of access, energy, trust, and hope that my needs will be understood and respected. And yet, I continue to fly. Not because it's easy, but because I believe in movement — not just mine, but the movement toward a more inclusive world.

That is why I welcome this report with deep appreciation. It does more than highlight the gaps; it gives visibility to our lived experiences, and, just as importantly, to the commitment for change that is growing across Europe. I see more airports trying. I see more staff asking the right questions. I see a shift from “accommodation” to “equal access.”

This report is not a list of complaints. It is a roadmap — informed by data, guided by rights, and strengthened by our stories. It recognises where we are now, but also points to where we can and must go next.

The European Union plays a crucial role in this progress. EU-level regulations and initiatives have laid the groundwork for protecting the rights of passengers with disabilities and ensuring equal access across Member States. But their true strength lies in how they empower individuals, organisations, and national authorities to keep pushing forward together, across borders, and with a shared vision.

As someone who uses air travel not occasionally but regularly, I can say: we are not where we need to be, but we are no longer where we used to be. And that matters.

Thank you to everyone involved in this important effort. I look forward to the day when flying is not an exception to manage, but a freedom to enjoy — equally, for all.



The European Disability Forum
7-8 Avenue des Arts 1210
Brussels – Belgium

info@edf-feeph.org

www.edf-feeph.org

Follow @MyEDF on social media

