

Air travel accessibility – Australia compared to global best practice

It is estimated that about 15% of the world's population have disability – in many OECD countries including the United Kingdom and Australia, it is around 20%. The prevalence of disability increases dramatically when people reach 65. In Australia, almost 50% of people aged over 65 have a disability and in the United Kingdom it is around 44%. These numbers are similar across most OECD and first world countries.

In an aviation context, annual growth for people with disability – that is the number and frequency of flights taken by people with disability - is six times that of the overall growth of certain airports. In a \$3.5 trillion industry, people with disability represent a significant commercial opportunity for airlines and airports that can accommodate more people with disability and improve their services and accessibility.

In Australia, the challenges experienced by people with disability using air transport commence from the time they choose and book flights online, through to making their way around the airport, then at check-in and security, all the way to getting on and off the plane. The inaccessibility, lack of attention to process and protocol, and a lack of awareness to the rights and needs of people with disability is stressful and distressing to many passengers.

And the low prioritisation of people with disability by airlines is exacerbated when planes are delayed, or staff numbers are reduced. This was especially evident during the Covid 19 pandemic. While the normal and most efficient practice is to board passengers requiring assistance first, during delays, people with disability are often boarded last which places a person receiving assistance in the awkward, inconvenient, and often embarrassing position of having to manoeuvre their way through a full plane. There have also been numerous incidents of people with disability being pushed off flights because there was no one available to assist them.

The United Nations Conventions on the Rights of Persons with Disabilities (CRPD) states that people with disability have a right to accessible, safe, and convenient public transport in their local area so their entitlement to live independently without barriers to roads and transportation can be realised. Australia is failing to meet this obligation.

Part of Australia's Civil Aviation Authority's (CASA) role is to provide advice to people with disability about the services that "may include":

- a customer service officer to help you at the kerbside, including loading your bags, pushing wheelchairs, and helping at check-in and with baggage
- a shuttle system, people movers or moving walkways
- priority boarding, either before or after other passengers
- emergency information in Braille or large-print books
- specialised equipment during the flight, such as upper torso restraints or leg support bridges
- an accessible toilet.

There is no reference to the obligations that airports and airlines have under the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD); no reference to support through security screenings; or access points at car parks, train stations or other airport entry points.

In 2021 CASA issued an advisory circular or addendum to the Civil Aviation Safety Regulations which “provides guidance” for the carriage of special categories of passengers. The advisory circular has many suggestions and recommendations but no additional regulations.

At Sydney Airport, there are accessible ‘drop-off zones’ but drivers must remain with the vehicle at all times and they are not able to stop for longer than five minutes. If the passenger with a disability requires assistance accessing the terminal they need a second support person (presumably the second support person only has five minutes to support the passenger and return to the car).

To their credit Sydney Airport recently opened a Changing-Places accredited bathroom at T1 International Arrivals with full-sized changing tables and hoists to assist people with profound disabilities and an assistance animal toilet for companion pets. The facility is wheelchair accessible and contains an artificial turf area, a disposable bin and water bowl for companion animals. And there are complimentary services for people with disability to be assisted at check-in and to navigate their way around the airport. The problem is that these services are too often understaffed leaving people with disability subjected to shabby treatment and on occasions, unable to board their flight.

As for airlines and using Qantas as an example, it appears that when it comes to providing assistance to people with disability, airlines will only do as much as they are required to do according to legislation. For instance, in Australia if a passenger requests wheelchair assistance Qantas can (not will) assist with getting to the gate, boarding, and disembarking the aircraft or getting to your seat provided you have given 48 hours-notice in advance of your flight. They may provide kerbside assistance dependent on the availability of staff and wheelchairs. Comparing Qantas’ website with CASA requirements there is no mention of kerbside assistance, collecting bags or assistance at check-in. That’s not to say that Qantas doesn’t provide those services from time to time, it just appears that they are unwilling to commit to them.

Like Qantas, Virgin Australia uses the term “may” when describing the type of assistance they offer to passengers. Virgin Australia ‘may’ provide mobility assistance to the airport terminal from kerbside. This will be subject to the availability of wheelchairs and staff on duty. Virgin Australia staff is unable to provide kerbside check-in or vehicle transfer assistance. Upon arrival at the airport, the guest must be accompanied by a companion who can notify Virgin Australia staff that a wheelchair is required at kerbside (this needs to be done within the five minutes allocated to drivers at the drop-off point).

When transferring to the aircraft you will be transferred into an aisle wheelchair to board the aircraft as close as possible to the aircraft door. At an airport without an aerobridge, you will transfer into our aisle chair at the check-in counter or on the tarmac, to be boarded onto the aircraft via the Disabled Person Lifter (DPL). On arrival at your destination, you will be supplied with a wheelchair (manual self-propelled or motorised where available) or your own manual wheelchair upon request (see above).

Virgin Australia staff can provide assistance to the baggage carousel, to connecting flights/carriers and between terminals if required or, subject to the availability of staff on duty, even to the closest drop off. This includes taxi ranks, bus stop or drop off bay.

A review of the Qantas’ website shows the disparity in [the level of service offered and provided here in Australia](#) where there are no regulations and the service provided to passengers with disability

[when the airline lands in Canada](#). In Canada Persons with a disability are entitled to certain accommodations and services under the [Accessible Transportation for Persons with Disabilities Regulations](#) (ATPDR) – see below.

On their websites, Qantas and Virgin both refer to their obligations under The United States Department of Transportation (USDOT) [14 CFR Part 382](#) Final Ruling - Non-Discrimination on the basis of Disability of Air Travel. The requirements under US legislation (listed below) suggest that both airlines have the capacity to be far more accommodating of people with disability than they are here in Australia which reinforces the view that when it comes to services and accessibility for passengers with disability, airlines will only do as much as the law requires.

There is no legislation to protect the rights of people with disability at airports or on Australian airlines unless that airline is flying to a destination where there is enforceable legislation, like Canada, the United States, and as I explain later in this document, the United Kingdom, and the European Union. Currently the only way that people with disability flying within in Australia can complain and receive reparation or recompense for failures by airlines and airports to meet their human rights is to prove that they were subjected to direct or indirect discrimination under the DDA.

It is up to individual complainants to 'call out' systemic problems and breaches of the transport standards. Aside from the stress, expense and effort that goes into lodging a complaint with the DDA, they don't achieve legislative change and conciliated agreements are often reached on the condition of their confidentiality. If a settlement is reached and a systemic problem is addressed, only the complainant who is party to the settlement agreement can act if the respondent fails to meet their obligations.

World's best practice - The International Air Transport Association

The International Air Transport Association (IATA) sets global commercial standards for 290 of the world's airlines including Qantas and Virgin Australia. IATA's main role is to represent, lead and serve the airline industry.

IATA works with government to deliver smarter or better regulation initiatives that cut unnecessary burdens on consumers and businesses. They champion regulation that delivers clearly defined, measurable policy objectives in the least burdensome way.

On accessibility, IATA states that Airlines and airports (IATA signatories) are working with people with disability and disability advocacy and representative groups to make flying as hassle-free as possible. In 2019 IATA held wheelchair assistance training for airport staff at Heathrow Airport in London, Indira Gandhi International Airport in India, and John F Kennedy Airport in New York. These training initiatives included representatives from airlines, airports, regulators, disability advocacy groups and other stakeholders. In addition to modernising standards and practices and educating on the importance of 'global travel chains' for people with disability, processes to reduce incidents of damage to electric wheelchairs and other assistive devices are also addressed.

IATA policies and protocols for people with disability

The IATA Passenger Accessibility Operations Manual (IPAOM) is a central reference guide to support airlines in the handling of passengers with disabilities, including those with reduced mobility and hidden disabilities. It provides a broader understanding of agreed industry standard procedures, mainly [IATA Resolution 700](#) and its associated recommended practices and existing national regulations that have been universally agreed upon by airlines.

The IPAOM contains best practices such as the usage of Special Service Requests (SSR) and SSR codes. SSR codes are used to communicate passenger preferences, procedural items, or services needed by passengers. Using the correct SSR codes will help identify the type of assistance passengers with disabilities need throughout their journey.

The rights and needs of passengers with disabilities are laid in several standards, rules, regulations, and guidelines around the globe, and differ from one country to another.

The IPAOM includes:

- **Applicability** - airline, airport & third-party responsibilities
- **Assistance codes** - special service request codes
- **Limitations** - clearance to fly, storage capabilities for mobility devices, group acceptance
- **Pre-Travel Communication** - information to communicate, medical conditions, assistance available at the airport
- **At the airport** - airport facilities, airport passenger process
- **Check-In** - verification procedures, seating accommodations, non-acceptance procedures
- **Mobility Device Handling** - storage, loading, inspection, information provision
- **Boarding and Disembarking** - pre-boarding, briefing, messaging
- **Irregular operations handling** - rebooking at the airport, reservation procedures
- **Claims and Travel Feedback** - incident reporting, EU vs DoT regulations - complaint resolution official and National Enforcement Bodies
- **Training** - scope, high level content of training programs

IATA and member airlines have also prepared the [Battery-Powered Wheelchair and Mobility Aid Guidance Document](#) (pdf) to support airlines to safely and efficiently accept and transport battery-powered wheelchairs and mobility aids required by passengers with reduced mobility.

They launched a global [Mobility Aids Action Group](#) in July 2021 to improve the handling of mobility aids for travellers with disability. The action group is made up of disability advocacy groups, airlines, ground service providers, airports, and mobility aids manufacturers.

Different legislation across the globe

While IATA is committed to safe, reliable, and dignified air travel, many of its member countries, including Australia, balk at legislating on accessibility standards and minimum service levels for people with disability.

IATA have many recommended practices including codes defining categories of passengers with disability for the purpose of meeting the level of support they may require. But if an airline or airport does not comply with the IATA standard then a traveller with disability has no assurance to the level of service they will receive from country to country and jurisdiction to jurisdiction - and in some instances on some airlines in some countries, whether they are even deemed as being a person with disability.

Canada

When Qantas flies to Canada the airline must:

- assisting the person with checking in at the check-in counter;
- permitting the person, if they are unable to use an automated self-service kiosk or other automated check-in or ticketing process, to advance to the front of the line at a check-in counter or ticket counter;
- assisting the person in proceeding through any security screening process at the terminal, including:
 - providing members of personnel to assist the person to proceed through the security screening process, or
 - collaborating with the relevant security authority or security personnel at the terminal to permit a person who is not travelling with the person with a disability to have access to the security screening checkpoint so that they may assist the person with a disability to proceed through the security screening process;
- assisting the person in proceeding to the boarding area after check-in;
- before boarding, transferring the person between the person's own mobility aid and a mobility aid provided by the carrier;
- assisting the person in boarding and disembarking;
- assisting the person in storing and retrieving their carry-on baggage;
- before departure and on arrival at the destination, transferring the person between a mobility aid and the person's passenger seat;
- assisting the person in moving in and out of a mobility aid space;
- in the case of a person who is blind or has any other visual impairment, describing to the person, before departure or, if impossible because of time constraints, after departure, the layout of the aircraft including the location of washrooms and exits, and the location and operation of any operating controls at the person's passenger seat;
- assisting the person in accessing any entertainment content that is offered on board, such as by providing them with a personal electronic device and assisting them in using that device;
- before departure, providing the person with an individualized safety briefing and demonstration;
- in the case of an aircraft, train or ferry, providing the person with an on-board wheelchair;
- assisting the person in moving between their passenger seat and a washroom, including by assisting them in transferring between their passenger seat and an on-board wheelchair;
- in the case of an aircraft, permitting a person to use the washroom that has the most amount of space, regardless of where the washroom is located, if the person needs an

on-board wheelchair or the assistance of a support person or service dog to use a washroom;

- in the case of a person who is blind or has any other visual impairment, describing to the person, if a meal is offered on board, all the food and beverages that are offered for consumption or providing a menu in large print or in Braille;
- if a meal is served on board to the person, assisting the person with the meal by opening packages, identifying food items and their location and cutting large food portions;
- assisting the person in proceeding through border clearance;
- assisting the person in retrieving their checked baggage;
- assisting the person, after disembarkation, in proceeding to the general public area;
- assisting the person, after disembarkation, in proceeding to a location where the person may receive assistance to proceed to the curbside zone from a member of the terminal operator's personnel; and
- assisting the person, if they are transferring to another segment of their trip at the same terminal, in proceeding to a location where the person may receive assistance from a member of the receiving carrier's personnel.

These legislated requirements appear on Canada's Justice Laws Website: Regulation SOR/2019-44N- Accessible Transportation for Persons with Disabilities Regulations.

Juxtapose Canada's Accessible Transportation for Person with Disabilities Regulations (SOR/2019-244) with CASA's enforcement manual which contains guidance material intended to assist CASA officers and delegates in carrying out their regulatory responsibilities. The only reference to disability in the enforcement manual refers to the role of the Legal Branch in providing advice on the Disability Discrimination Act (DDA) – that is, how to manage complaints under the DDA, not how to avoid complaints under the DDA by improving services and accessibility for people with disability.

The Unites States

The [Americans with Disabilities Act of 1990](#) (ADA) aims at prohibiting discrimination against people with disability and implementing accessibility measures in public accommodations. Every American airport must follow rules and regulations to make sure that travellers with disabilities can easily access the same services and advantages as other travellers.

The United States' [Air Carrier Access Act \(ACAA\)](#) prohibits discrimination on the basis of disability in air travel and applies to all flights by United States (U.S) airlines and flights to and from the U.S by foreign airlines.

Under the United States Department of Transport (USDOT) [14 CFR Part 382](#) Final Ruling - Non-Discrimination on the basis of Disability is an amendment to the ACAA of 1986 to prevent US and foreign carriers from discriminating against passengers on the basis of disability. Provisions for foreign carriers, assistive devices, automated airport kiosks, battery powered mobility aids, CPAP machines and high-contrast captioning were just some of a suite of amendments that 14 CFR Part 382 added to the ACAA.

In the US, prohibited discriminatory practices include:

- Airlines may not refuse transportation to people on the basis of disability. Airlines may exclude anyone from a flight if carrying the person would be inimical to the safety of the flight. If a carrier excludes a person with a disability on safety grounds, the carrier must provide a written explanation of the decision.
- Airlines may not require advance notice that a person with a disability is traveling. Air carriers may require up to 48 hours' advance notice for certain accommodations that require preparation time (e.g., respirator hook-up, transportation of an electric wheelchair on an aircraft with less than 60 seats).
- Airlines may not limit the number of persons with disabilities on a flight.
- Airlines may not require a person with a disability to travel with another person, except in certain limited circumstances where the rule permits the airline to require a safety assistant.
- If a passenger with a disability and the airline disagree about the need for a safety assistant, the airline can require the assistant, but cannot charge for the transportation of the assistant.
- Airlines may not keep anyone out of a specific seat on the basis of disability or require anyone to sit in a particular seat on the basis of disability, except to comply with FAA or foreign-government safety requirements. FAA's rule on exit row seating says that airlines may place in exit rows only persons who can perform a series of functions necessary in an emergency evacuation.

Other Services and Accommodations

- Airlines are required to provide assistance with boarding, deplaning (disembarking), and making connections. Assistance within the cabin is also required, but not extensive personal services (personal care).
- Where level-entry boarding is not available, there must be ramps or mechanical lifts to service most aircraft with 19 or more seats at U.S. airports with over 10,000 annual enplanements (boardings).
- Disabled passengers' items stored in the cabin must conform to FAA rules on the stowage of carry-on baggage. Assistive devices do not count against any limit on the number of pieces of carry-on baggage.
- Collapsible wheelchairs and other assistive devices have priority for in-cabin storage space (including in closets) over other passengers' items brought on board at the same airport, if the passenger with a disability chooses to preboard.
- Wheelchairs and other assistive devices have priority over other items for storage in the baggage compartment.
- Airlines must accept battery-powered wheelchairs, including the batteries, packaging the batteries in hazardous materials packages when necessary. The airline provides the packaging.
- Airlines must permit a passenger to use his/her Portable Oxygen Concentrator during the flight if it is labelled as FAA-approved.
- Airlines may not charge for providing accommodations required by the rule, such as hazardous materials packaging for batteries. However, they may charge for optional services such as providing oxygen.
- Other provisions concerning services and accommodations address treatment of mobility aids and assistive devices, passenger information, accommodations for persons with vision and hearing impairments, security screening, communicable diseases and medical certificates, and service animals.

Accessibility of Facilities

- New aircraft with 30 or more seats must have movable aisle armrests on half the aisle seats in the aircraft.
- New twin-aisle aircraft must have accessible lavatories.
- New aircraft with 100 or more seats must have priority space for storing a passenger's folding wheelchair in the cabin.
- Aircraft with more than 60 seats and an accessible lavatory must have an on-board wheelchair, regardless of when the aircraft was ordered or delivered. For flights on aircraft with more than 60 seats that do not have an accessible lavatory, airlines must place an on-board wheelchair on the flight if a passenger with a disability gives the airline 48 hours' notice that he or she can use an inaccessible lavatory but needs an on-board wheelchair to reach the lavatory.
- Airlines must ensure that airport facilities and services that they own, lease or control are accessible in the manner prescribed in the rule.

Administrative Provisions

- Training is required for airline and contractor personnel who deal with the traveling public.
- Airlines must make available specially trained "complaints resolution officials" to respond to complaints from passengers and must also respond to written complaints. A DOT (Department of Transportation) enforcement mechanism is also available.
- Airlines must obtain an assurance of compliance from contractors who provide services to passengers.

Since 2018, several of the largest airlines in the U.S. have lost or damaged some 15,425 mobility devices – a staggering 29 each day.

United Kingdom and European Union

Systemic incidents and issues of transport disadvantage and exclusion in the United Kingdom (UK) against people with disability, particularly on buses and trains, led to the introduction of the Equality Act in 2010. Since the introduction of the Equality Act, access and inclusion for people with disability on public transport has improved considerably

When the U.K. left the European Union it adopted EC 1107/2006 as its own law to maintain a close relationship with European stakeholders and citizens. Carriers and airports in the EU still operate under Regulations 1107/2006. The regulation identifies who is responsible for the provision of services and support and describes the type of services that are available. It also establishes compliance and enforcement mechanisms.

The regulation states that people with disability should not be refused transport on the grounds of their disability or lack of mobility, except for reasons which are justified on the grounds of safety and prescribed by law.

The regulation is designed to ensure that people with disability have opportunities for air travel comparable to those of other citizens. Assistance to meet their specific needs should be provided at the airport as well as on board the aircraft. Airports are responsible for assisting passengers from the time they arrive at the airport until they get on their flight and airlines are responsible for assisting passengers onboard the aircraft and transporting their wheelchairs.

If you're a passenger with a disability or reduced mobility you are legally entitled to support, or 'Special Assistance', when travelling by air. This assistance is available to elderly passengers; people with physical disability including wheelchair users; people who have difficulty with social interaction and communication such as people with autism or dementia; people who are blind or deaf, visually or hearing impaired and people with assistance dogs.

People requiring assistance are requested, by most airlines and airports, to notify the airport 48 hours in advance of travelling in most cases; Finnair request 72 hours notice. Finnair also states on its website that they will only transport wheelchairs if they have sufficient room in the aircraft hold. This would appear to be a breach of the regulations unless they are referring to situations where the dimensions of the wheelchair exceed the aircraft hold's capacity.

Your right to special assistance (free of charge) is stipulated in UK law, and applies when:

- You fly on any airline from a UK airport
- You fly on an EU or UK registered airline to an UK airport
- You fly from outside of the UK or EU to the EU on a UK carrier

Help is available from the moment you arrive at an airport and can cover:

- Your journey through your departure airport
- Boarding the aircraft and during the flight
- Disembarking the aircraft
- Transferring between flights and
- Travelling through your destination airport (if your destination is the UK).

The U.K. Civil Aviation Authority (CAA) considers minimum acceptable standards of service for passengers with disability to be:

- 98% of pre-booked passengers with disability to be assisted within 20 minutes from the aircraft arriving at the stand or at the airbridge.
- 98% of arriving non-pre-booked disabled persons, assistance is available for each passenger within 45 minutes from the aircraft arriving at the stand or at the airbridge.

According to the regulator's guidance, airports should record and investigate each incident where the assistance for each passenger (both pre-booked and non-pre-booked) is not available within 45 minutes from the aircraft arriving at the stand or at the airbridge.

The investigation should determine the cause, or causes, of the service failure and a summary of the findings of the investigation for each incident should be submitted to the CAA.

Assistance Points

When you arrive at the airport you should go to an assistance point. This can be inside or outside of the terminal.

UK airports have assistance points with clear disability related logos located at various places within the boundaries of the airport; usually car parks, drop off points, train stations and bus terminals.

People with disability use the telephone or buzzer to call for assistance.

From assistance points you can get help to:

- Get to a “special assistance” area in the terminal building
- Check-in and bag drop (if required)
- Through security and into the departure lounge and to the departure gate
- Into a seat and bags in storage
- At destination through immigration, customs, baggage reclaim to a designated arrival point (depending on the country).

Wheelchairs

- Two mobility items are permitted free of charge.
- Airlines are liable for any damage to mobility equipment up to approximately £1,300 (extra insurance is recommended).
- If a mobility item is damaged the airport provides a temporary alternative while being repaired but not necessarily on a like for like basis.
- Around the airport and during flights, travellers in a wheelchair will be assisted to access toilets but they will not provide toileting assistance.

UK's Civil Aviation Authority (CAA)

The CCA's accessibility framework ranks the performance of airports for passengers requiring assistance and has overseen millions of pounds of investment made by airports towards improving consumers' experiences.

While there were considerable improvements in the performance of most airlines to 2020 - all rated good to very good against the accessibility framework – there was a spate of post Covid and post Brexit complaints from passengers in wheelchairs who claim they have been left alone for hours on an empty plane waiting for assistance after a flight. Long delays are being experienced by thousands of passengers at UK airports due to staff shortages.

But the number and nature of complaints suggest that the issues are more deeply entrenched and precede the Covid related, staff shortage problems.

Fazilet Hadi, the head of policy at **Disability** Rights UK said: “The current situation for all airline passengers is appalling and for disabled people who need assistance, it's a whole lot worse. Many of us need help to navigate through the airport and on and off planes, we are completely reliant on the assistance and when it doesn't work the stress and anxiety is absolutely enormous.”

“Airports should never let these situations occur, they have clear legal duties under the Equality Act to make reasonable adjustments for disabled passengers and it is clear from incidents like the one described that this is just not happening.”

Because the providing of assistance is a legal requirement, unlike Australia, UK's Civil Aviation authority have given the offending airports a deadline to improve their performance or face enforcement action. And without minimising the severity of the complaints, UK passengers can make a direct complaint to the Civil Aviation Authority under the Equality Act, unlike complaints brought by individuals in Australia who first have to take the path of proving direct or indirect discrimination under the Disability Discrimination Act 1992 (DDA).

Unfortunately, there is a legal loophole in the UK that prevents the CCA from imposing fines on airports. That authority has been given to the states (local jurisdictions) to enforce. However, the

CAA does have the legal authority to ensure that airports comply with all of the agreements and standards laid out by the CAA and the Department of Transport. If they don't, then the CAA can enforce their authority through the courts.

European Union

In general terms Regulation 1107/2006 applies in the UK and the EU. Given the number of separate national carriers and airports in the EU, there may be variations in the way they request information from their passengers, their capacity to carry wheelchairs and the accessibility of their toilets from the United Kingdom however the standards are essentially the same. Most airlines in the EU request 48 hours-notice to provide special assistance – 72 hours on Finnair . The Finnair airbus A330 and A350 are equipped with a wheelchair for visiting the toilet on long haul flights while all of Norwegian airlines toilets are partially wheelchair accessible.

When you travel by plane, you have the right to assistance, free of charge. This can include:

- assistance with your luggage
- getting on and off the plane
- during the flight and in airports before and after your flight
- ground handling services if you are travelling with an assistance dog.

Under EU law, passengers with disability can't be denied boarding because of a disability or reduced mobility, unless the aircraft is physically too small, there are security concerns, or safety rules prevent the airline from transporting you.

Airlines do not have to provide help with eating or taking medication during a flight. If you need this type of help, for example during a longer flight, airlines might request that another person accompany you. The same applies to toilet assistance. Airlines with airbus A330 and A350 are equipped with a wheelchair for visiting the toilet on long haul flights while all of Norwegian airlines toilets are partially wheelchair accessible.

Innovations

Munich-based [Revolve-Wheel](#) has come up with the Revolve Air, a wheelchair that collapses down to 60% of the size of regular folding chairs – meaning it will be able to be stored in overhead compartments as hand luggage.

Meanwhile, Texas-based [All Wheels Up](#) is crash testing and lobbying for planes to be fitted with wheelchair tie-downs and restraints to enable passengers to board and fly seated in their own devices.

Nonetheless, innovation is only a fraction of the battle because much of the infrastructure exists today to enable passengers with disabilities to fly in more comfort and safety.

Conclusion

Since Australia adopted the [United Nations Convention on the Rights of Persons with Disabilities](#) (UNCRPD) in 2008, Australia's Civil Aviation Authority's (CASA) has done little to reduce discrimination against people with disability on airlines and in airports. Australia, compared to the

rest of the world, does not respond well to the mobility needs of people with disability who travel by air. Other countries and jurisdictions are far more proactive in their efforts to reduce operational complexity and increase accessibility.

The US made amendments to the Air Carriers Access Act in 2008; The United Kingdom introduced the Equality Act in 2010; and Canada introduced Regulation SOR/2019-44N- Accessible Transportation for Persons with Disabilities Regulations in 2019.

In complete contrast to the level of awareness and regulation introduced in the US, UK, EU and Canada, an addendum to the Civil Aviation Safety Regulations (CASA) in 2021 did nothing to bolster regulations or reduce the possibility of discrimination against people with disability at Australian airports or on our airlines.

In Australia, and in many other places (Singapore, Hong Kong included) barriers limiting the ability of people with disability to take full advantage of international air transportation services remain. These include different or incompatible regulatory requirements, and the absence of international laws or harmonized accessibility measures throughout the passenger journey.

The number of elderly as well as persons with disabilities make up a significant and growing percentage of the world's population and constitute the world's largest minority. Making global air travel fully accessible for them and for all is not only the right thing to do but makes perfect business sense.