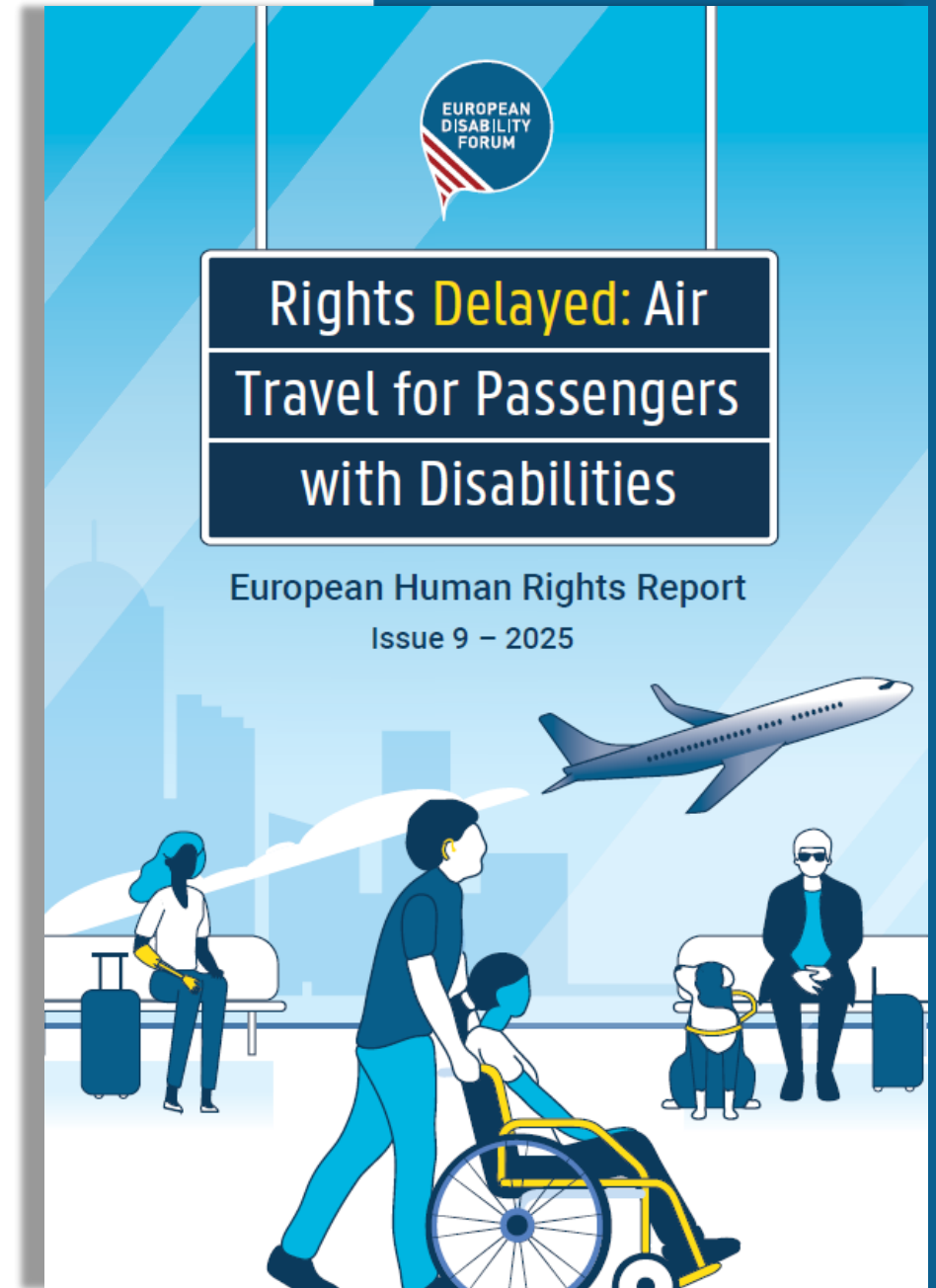


Rights Delayed: Air Travel for Passengers with Disabilities



9th Human Rights Report
Trinational DE AT CH Pax meeting
8 October 2026



EDF Human Report on air travel

- Specific barriers that passengers with disabilities face in air travel
- Analysis of EU legal framework
- Implementation of EU law by airlines, airports and NEBs
- Good practices
- Recommendations to different stakeholders

Published November 2025



**Scan to check out
the complete report!**

How do passengers with disabilities feel about air travel?

EDF surveyed 250 passengers with disabilities and their families. Among them:

- **67% don't have equal access to air transport**
- **87% face some type of barrier when planning or during the journey**

What are these barriers?

“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 seat 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”

Passenger with a physical disability



“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



“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



“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



“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”

Passenger with an invisible disability



Regulation 1107/2006 has improved access to air travel. However, there are still barriers and cases of discrimination against passengers with disabilities. **Why?**

Gap 1: Safety Restrictions



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

“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



Gap 1: Safety Restrictions



Out of the 30 airlines analysed:

- **9** apply comfort considerations to impose a safety assistant
- **4** only accept international assistance dogs' training documents
- **Many** airlines apply different size and weight restrictions for mobility equipment and limits of PRM on board (next slide)

“I am a permanent wheelchair user and have travelled independently for more than five decades. Recently, an EU airline informed me that because I cannot independently leave my aircraft seat and reach an emergency exit, I was required to travel accompanied. For a permanent wheelchair user who is otherwise fully autonomous, such requirement has significant consequences”.

[Check results in the Annex.](#)

Passenger with a physical disability



Gap 1: Safety Restrictions



Same aircraft model, different rules

Limit of wheelchairs on board	
Boeing 737	Ryanair – 2 Wheelchairs
	TAROM – 2 WCHC
Airbus 320	TAP – 8 WCHC
	SAS – 6 wheelchairs
Airbus 330	TAP – 6 WCHC
	SAS – 14 wheelchairs

Mobility equipment Weight restrictions	
Airbus A320	Finnair – 300 KG
	Braathens – 150 KG
ATR - 72	SAS – 80KG
	Finnair – 200 KG

What about those airlines that do not publish the rules or have not been covered by the report?

Gap 2: Transparency



Out of 30 airlines analysed, only:

- **10** publish criteria to determine limit of PRM on board
- **18** publish information on mobility equipment restrictions
- **20** publish information on cabin wheelchair

[Check results in the Annex.](#)



Gap 2: Transparency

Out of the 30 airlines analysed, only:

- **19** inform about Regulation 1107/2006. Among them:
 - 4** provide it in the terms and conditions
 - 9** make only a reference to the regulation
- **5** inform about the existence of National Enforcement Bodies

[Check results in the Annex.](#)



Gap 3: Not covered by EU law (yet)

- Accessibility of airplanes and airports
- Lengthy approval process (mobility equipment and assistance dogs)
- Affordability of the journey



Gap 4: Airports



Out of the 38 airports analysed:

- **13** do not cooperate with National Disability Councils* (for the rest different types of cooperation exists)
- **12** do not publish Quality Standards on their website
- **8** do not inform about regulation 1107/2006 on their website
- **16** do not inform about the existence of NEBs on their website

Gap 5: Enforcement (NEBs)



Binding decisions:

- **14 NEBs** can make binding decisions when breaches are found, while some **10 NEBs** cannot

Financial penalties:

- **19 NEBs** can impose fines directly on airlines and airports, while **6 NEBs** need to go through a different authority.
- Only **8 NEBs** have imposed penalties over the years
- Level of fines vary considerably between Member States

Gap 5: Enforcement (NEBs)

Cooperation with organisations of persons with disabilities

- **3 NEBs** have set up advisory boards:

Denmark, Ireland and Italy

- **10 NEBs** report collaboration with disability groups:

France, Germany, Greece, the Netherlands, Finland, Lithuania, Luxembourg, Slovakia, Spain and Sweden.

11 NEBs confirmed that no formal collaboration is in place

3 NEBs Member States did not respond to our information request

Gap 5: Enforcement (NEBs) Potential infringements

- More than 48h prenotification: **Luxair, Bulgaria Air, KM Malta.**
- More than 48h prenotification to travel with assistance dogs in specific routes: **KLM, Air France and Iberia.**
- Don't accept assistance dogs in specific routes: **EasyJet, Ryanair and LOT.**
- Don't accept assistance dog at all: **Braathens.**
- Request of medical certificates / forms: **Bulgaria Air, KM Malta and Sky Express.**
- Charge of a fee for the provision of assistance: **KM Malta.**

* Websites reviewed between February and April 2025

Gap 5: Enforcement Transparency and information

- Most NEBs websites contain limited information on enforcement powers, activities, sanctions and passenger complaints
- Most NEBs provide comprehensive information on Regulation 1107, but some provide limited/no information (in some cases, websites only contain a link to the legislation).
- Only 1 NEB (AT) provides information on Equality Bodies

Passenger complaints – Are they enough?

Low level of passengers' complaints to NEBs does not mean that regulation 1107/2006 is well implemented:

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

Passengers' expectations

- Travel on **equal basis** with others (same rights and obligations)
- Be consulted and **involved** in the decision affecting them
- Strong **legal framework**
- Effective **enforcement and redress**
- **Accessibility** of airplanes and airports
- Simple booking processes and easy travel with mobility equipment and assistance dogs
- Quality **training and assistance** provision
- **Affordability** measures

Check EDF
recommendations!



Final recommendations:

- Address cases of potential non-compliance by air carriers and airports.
- Proactively engage with airlines and airports to make their practices more inclusive.
- Establish cooperation mechanisms with organisations of persons with disabilities.
- Raise awareness on passenger rights
- Improve complaint procedures, transparency, website accessibility



Conclusions

EDF research is only the tip of the iceberg!

(more than 100 airlines and 400 airports in the EU).

- Passengers with disabilities still face many barriers
- Most important barriers for PRM are not addressed by EU law
- Divergent airlines and airport practices (and some potential infringements)
- Diversity of enforcement regimes
- Limited personal redress when rights are not respected
- **Limited cooperation with organisations of persons with disabilities**

**Check EDF
recommendations!**



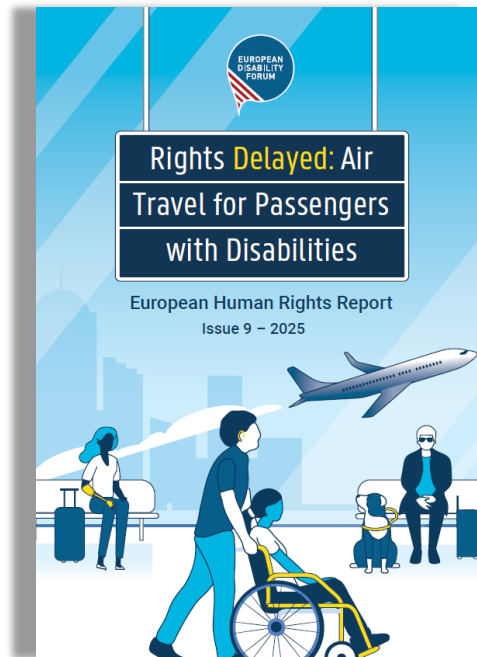


Questions?





**Thank you to all of you for your
cooperation in the process!**



**Scan to check out
the complete report**