

Explainer: Draft aviation disability standards

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Introduction

People with disability face regular barriers when travelling by air. They can arise at any stage of a journey: because of inaccessible airport facilities and services and airline policies and practices that do not meet the needs of passengers with disability.

To address these longstanding issues, the Australian Government committed to developing aviation disability standards ('standards'). The aim of the standards is to remove discrimination and improve accessibility across all stages of air travel. The standards will apply throughout Australia, including for international flights to or from Australia.

The Government is now seeking feedback on draft standards, which have been informed by people with disability in a series of co-design workshops. The feedback will contribute to development of the final standards that are implemented.

We have prepared this Explainer to help the disability community participate in the [consultation process](#). Submissions close on 2 October 2026.

The Justice and Equity Centre, together with the Australian Federation of Disability Organisations (AFDO) and People with Disability Australia (PWDA), are members of a Steering Committee advising the Government through the co-design process for these draft standards. Our role on the Steering Committee has given us direct insight into the views and experiences shared by participants in the co-design workshops, which is supplemented by our experience representing people with disability in complaints against airlines and airports. We have used these insights and experiences to assess whether the Government's proposals adequately respond to accessibility issues raised.

Enforceable accessibility standards are not a new concept for the air travel sector. Accessibility requirements for air travel are mandated in places including Canada, the European Union, and the United States. Australia lags behind these jurisdictions in providing clear and consistent legal protections for passengers with disability.

How to give feedback

The Government's [consultation paper](#) is structured around four stages of the air travel journey:

- Chapter 1: Whole of journey
- Chapter 2: Booking and planning
- Chapter 3: At the airport
- Chapter 4: On the aircraft.

Each chapter addresses specific barriers experienced by people with disability and outlines options for reform. The Government is considering three types of options:

- **Regulatory:** airlines and airports would be required to comply with new laws (regulations).
- **Non-regulatory:** the Government would issue guidance on best practice. Airlines and airports would be encouraged to follow the guidance, but it would not be compulsory.

- **No change:** no new laws or guidance would be introduced, leaving it to airlines and airports to decide if and how to make their services more accessible.

In many cases, the consultation paper only outlines the regulatory option being considered for each section. However, the Government is seeking feedback on whether a regulatory option, a non-regulatory option, or a no change option would be the most appropriate. When providing feedback, people should clearly indicate which option they support.

The JEC supports a **regulatory approach** across all areas covered by the consultation paper, as existing policies and practices of airlines and airports continue to cause barriers for people with disability.

Many of the proposed reforms are positive steps towards improving accessibility. However, in some areas we consider the proposals do not go far enough to address the issues identified by people with disability. For these sections, we explain our concerns and make suggestions on how the proposals could be improved.

For each chapter and section of the consultation paper, this Explainer:

- explains the issue needing to be addressed;
- summarises the Government's 'regulatory' proposal;
- sets out the JEC's view, particularly where we consider the proposal does not go far enough; and
- highlights key questions that could guide feedback. Many of these are asked directly in the consultation paper but some are our suggestions.

You can use this Explainer with the consultation paper to provide feedback on individual sections, chapters or the entire paper.

1. Chapter 1: Whole of journey

1.1 Set out roles and responsibilities of airports and airlines

The issue

Airlines and airports share responsibility for assisting passengers with disability throughout their journey. However, the availability and quality of accessibility services vary between airports, and it is not always clear whether an airline or airport is responsible for providing a particular service at a particular stage of travel. People with disability have reported situations of being left waiting for assistance or stranded within airport terminals.

Co-design participants want consistent accessibility services across all airports, as well as clear information about who is responsible for delivering those services. Co-design participants suggested a 'concierge' model, where a passenger receives assistance throughout their journey, from arrival at the departure airport through to leaving the destination airport.

What is the regulatory option proposed?

Three regulatory options are being considered for whether airlines or airports should be responsible for providing accessibility services to passengers.

Option 1: Shared responsibility between airports and airlines

Airports and airlines would share responsibility:

- Airports would be responsible for assisting passengers from arrival at the airport until they reach check-in.
- Airlines would be responsible for assisting passengers from check-in through to baggage collection and customs clearance, and to meet connecting flights.
- Airports would then be responsible for helping passengers access onwards ground transport.

Option 2: Airport responsibility

Airports would be responsible for assisting passengers from arrival at the airport (including public transport, car parks, drop off zones) to the departing aircraft door, and from the arriving aircraft door to onwards ground transport or connecting flights.

Airlines would be required to share information about a passenger's assistance needs with the relevant airport within 48 hours of receiving that information.

This option is broadly consistent with the model used in the European Union.

Option 3: Airline responsibility

Airlines would be responsible for assisting passengers throughout the entire journey, from arrival at the airport to onwards ground transport or connecting flights.

This option is broadly consistent with the model used in the United States.

Our view

Airports manage the infrastructure within airport terminals. If airports also have responsibility for assisting people to access airport terminals, there is an incentive for them to identify accessibility barriers and make improvements.

Airlines have a direct customer relationship with passengers but generally do not control airport infrastructure and have limited ability to make physical changes within terminals.

For that reason, we think it makes sense for airports to provide accessibility services in the terminal (Option 2).

Questions to consider

- Which option would provide the most effective accessibility services across the passenger journey?

1.2 Make sure staff are trained to support people with disability

The issue

Co-design participants identified inadequate staff training as a widespread and ongoing problem in air travel. They reported inconsistent experiences when interacting with airline and airport staff, and with staff having different understandings of policies and procedures and providing conflicting information. People also raised concerns about unsafe transfer methods and boarding assistance.

Co-design participants said all airline and airport staff should receive mandatory disability awareness training. They said training should:

- be co-designed and co-delivered with people with disability;
- cover interacting with people with disability, including accessible communication, respecting a person's autonomy and responding to disability-related behaviours;
- promote a consistent understanding of policies and procedures; and
- be made publicly available so passengers can understand the training staff have received.

What is the regulatory option proposed?

Recent updates to Australian disability standards for public transport will require airlines and airports to provide disability awareness training to staff to support passengers with disability. This training must be:

- developed in consultation with people with disability and delivered by a qualified trainer;
- tailored to the responsibilities of different staff roles; and
- refreshed annually.

The proposal in these draft aviation standards is to introduce additional training requirements specific to air travel, including:

- safe and dignified methods for transferring passengers to and from mobility aids;
- understanding different types of mobility aids and how to safely handle, transport and store them; and
- competency assessments to ensure staff can apply their training in practice.

Airlines and airports would be required to provide information about their disability awareness training programs to members of the public on request. This information would be limited to high-level details that are not commercially sensitive, such as:

- the name of the training provider;
- the number of training hours provided;
- whether the training was developed in consultation or co-designed with people with disability;
- the categories of staff who complete the training; and
- the outcomes of the training program.

The additional training proposed is similar to requirements in Canada.

Our view

We support mandatory training for all staff, including additional training and competency assessments for staff who provide manual assistance to passengers with disability or who handle disability aids.

Mandatory training would reduce injuries and minimise mishandling of and damage to disability aids. Training should be co-designed and delivered by disability-led organisations.

Information about disability awareness training programs should not be limited to information considered 'not commercially sensitive'. Training staff to appropriately support and interact with passengers with disability is a fundamental part of providing an accessible service, not a point of commercial competition between airlines or airports.

Question to consider

- Are there additional training outcomes that should require training and/or competence assessments?

1.3 Set up disability reference groups

The issue

There is currently no requirement for airlines or airports to consult with people with disability when designing transport facilities or developing policies, processes and services that affect passengers with disability.

Co-design participants emphasised the importance of involving people with disability early in decision-making, including about accessibility facilities and services, airport upgrades and aircraft fit-outs. Co-design participants said airlines and airports should establish disability reference groups to ensure people with disability have an ongoing role in shaping decision-making.

What is the regulatory option proposed?

Airlines and airports that have a minimum passenger threshold (to be determined) would be required to establish disability reference groups. These groups would have to be consulted before significant changes are made that could affect the experience of passengers with disability.

The groups would meet at least twice each year.

The Government would develop guidance on establishing disability reference groups, including:

- ensuring members are independent and reflect the diversity of people with disability;
- recommended remuneration for members; and
- examples of the types of issues that should be considered by the group, such as what constitutes a 'significant change'.

Our view

Every airline and airport should be required to establish a disability reference group. This requirement should apply regardless of any minimum passenger threshold. Limiting the requirement to larger airports and airlines could exclude many regional and remote locations, where accessibility barriers are often more significant.

1.4 Report on how standards are being met

The issue

There is currently no requirement for airlines or airports to publicly report on their accessibility services. Co-design participants strongly supported mandatory reporting by airlines and airports, and said reporting should include:

- the number of mobility aids that are lost or damaged;
- the number of complaints relating to disability discrimination or injuries experienced during air travel; and
- the number of occasions on which passengers with disability are refused travel, and the reasons for those decisions.

What is the regulatory option proposed?

Airlines and airports that have a minimum passenger threshold (to be determined) would be required to report to the Government on their compliance with the standards.

Airlines would also be required to report annually on:

- the number of disability aids that are lost or damaged;
- the amount of staff disability awareness training and refresher training delivered, and the outcomes of that training;
- the number of occasions on which a passenger is refused air travel because of their disability and the reasons for the refusal;
- the number of assistance animals that are refused carriage; and
- the number of complaints of injury or disability discrimination experienced related to air travel.

This requirement to report annually on damage to mobility aids and discrimination complaints is similar to requirements in the United States.

Our view

Every airline and airport should be required to report on compliance with the standards. This requirement should apply regardless of any minimum passenger threshold. Limiting reporting obligations to larger airlines and airports could mean that accessibility barriers at smaller, regional or remote locations are not identified and addressed. Consistent reporting across the entire aviation sector would improve transparency and help monitor whether the standards are working in practice.

2. Chapter 2: Planning and booking air travel

2.1 Offer passenger assistance profiles

The issue

People with disability often have to repeat their accessibility needs every time they book a flight, even if they have flown with the same airline before. Even when they provide this information during booking, it does not always reach the staff who assist them on the day of travel.

Co-design participants supported the option of an online profile where people can indicate their accessibility needs, and for this profile to be shared with airports and other airlines.

What is the regulatory option proposed?

Passengers with disability could choose to save information about their accessibility needs in a personal 'profile' with the airline, instead of repeating the same information every time they book a flight.

This profile could include details like preferred seating, communication needs, disability aids, medication, medical equipment, assistance animals and any carers travelling with them.

To make the journey smooth, the airline would share this information with all airports the passenger passes through (departure, stopover and destination) and with any other airlines involved in the booking.

Our view

This proposal would help address the current burden on passengers with disability, improve communication, and increase confidence that accessibility needs will be understood and met.

Questions to consider

- What information would people with disability like to see included in their profile?
- How long should information in a profile be held by airlines?

2.2 Clarify times where limits on passengers requiring assistance may apply

The issue

Some airlines place limits on the number of passengers who need assistance that can travel on a flight. These restrictions are sometimes known as a 'two-wheelchair policy', but they can also affect passengers who need assistance for reasons unrelated to using a wheelchair.

As a result, passengers with disability may be refused travel on their chosen flight.

Co-design participants want to see these types of limits removed, and the standards provide an opportunity to do that.

What is the regulatory option proposed?

Airlines would be allowed to limit the number of passengers who require assistance to board and disembark from an aircraft where there is a 'significant safety or operational issue'. Passengers who need wheelchair assistance only within the airport, and not for boarding or leaving the aircraft, would not be included in any limit.

Our view

We think the standards should *prohibit* airlines from limiting the number of passengers who require assistance on a flight, except where this is necessary for genuine safety reasons. This would align Australia with the approach taken in the United States and the European Union.

Without a clear prohibition, airlines are likely to continue applying limits, which prevent people with disability from travelling on an equal basis with others.

Questions to consider

- Does the Government's proposal go far enough to address this issue?
- Should airlines be required to publish their reasons for placing limits on the number of passengers on a flight who require assistance to board and disembark?

2.3 Services must be provided when passengers give advance notice of accessibility needs

The issue

Airlines and airports ask passengers with disability to provide advance notice if they need support or assistance, such as mobility assistance or travelling with an assistance animal.

Co-design participants want a clear and consistent process for providing this information. They want to know what information is required, when it needs to be provided, and that the same rules will apply across all airlines and airports. Co-design participants also want certainty that the requested support will be provided.

What is the regulatory option proposed?

If a passenger requests support or assistance at least 48 hours before their flight, airlines and airports must provide the requested service. Airlines must also give the passenger written confirmation of the assistance they will provide and coordinate with airports if needed.

If the passenger does not give 48 hours' notice, airlines and airports must still make every reasonable effort to provide the requested support or assistance.

This proposal reflects requirements in Canada and the European Union. By contrast, in the United States, a passenger with disability does not need to request assistance in advance to travel on a flight.

Our view

This proposal would provide greater certainty to passengers with disability about the process and expectations for requesting and receiving assistance. However, advance notice requirements can limit the flexibility of people with disability to travel on the same basis as everyone else.

If the standards say an airline must make ‘every reasonable effort’ to provide assistance, we think it should be clearer what this means. For example, assistance should only be declined where there are genuine safety or operational reasons preventing the airline from providing the assistance, and not merely because it might involve additional cost.

Questions to consider

- Should advance notice be required for passengers with disability to travel on a flight? If so, what is the appropriate timeframe for passengers to provide advance notice?
- Where no advance notice is given, is ‘every reasonable effort to provide the service’ appropriate?

2.4 Make sure people with disability access the same fare regardless of the method of booking

The issue

While there are different methods to book flights, not all methods are accessible for people with disability. While booking by phone may be more accessible for some people, it can take longer and may involve extra fees. In some cases, passengers who book by phone may also be unable to access sale fares that are available online.

Co-design participants said people with disability should be able to use all available booking methods and have access to the same fares, regardless of how they book.

What is the regulatory option proposed?

Airlines would be required to:

1. allow people with disability to choose how they book flights, including being able to book online without having to call the airline; and
2. offer the same airfares to people with disability regardless of whether they book online, by phone or through a chat function, including during sale periods.

Our view

This proposal seems to address the issue by ensuring people with disability have equal access to all available booking methods and fares.

2.5 Clarify rules for carriage of assistance animals on aircraft

The issue

The *Disability Discrimination Act 1992* (Cth) makes it unlawful to discriminate against a person with an assistance animal. However, airlines have different requirements and approval processes for assistance animals, with some more restrictive than others.

Co-design participants want a clear and consistent process across all airlines. They want certainty about what information is required to apply and how long airlines have to decide an application. Co-design participants also said that once an assistance animal has been approved, that approval should remain valid for future flights rather than requiring a new approval each time. They also want passengers with pre-approved assistance animals to be able to check-in online instead of in-person.

What is the regulatory option proposed?

Airlines would be required to have a consistent process for passengers travelling with an assistance animal, including:

- providing clear information about what a passenger must provide to the airline;
- meeting a set timeframe to decide applications (eg 48 hours), with a failure to make a decision within that timeframe treated as a refusal;
- providing reasons for their decision in an accessible format; and
- the ability for passengers travelling on domestic flights with a pre-approved assistance animal to check-in online.

Our view

This proposal would go some way to address the issue. However, the information required by airlines needs to ensure all assistance animals recognised under the *Disability Discrimination Act 1992* can qualify – if the information requirements are strict, some assistance animals could still be excluded.

The information required also needs to be consistent across all airlines. To achieve this, the standards could list the evidence a person with an assistance animal can be asked to provide.

For consistency with the proposed advance notice requirements at section 2.3 above, airlines should also be required to decide applications to travel with an assistance animal within 48 hours where the passenger has provided at least 48 hours' notice of their travel.

We support the proposal that an airline's failure to make a decision within the required timeframe be treated as a refusal. This would provide passengers with certainty to pursue a discrimination complaint.

Where a passenger is refused travel with their assistance animal, the passenger should have the option of a refund or rebooking.

Question to consider

- For air travel, what is the minimum evidence that can be requested to demonstrate:
 - an animal is trained to alleviate the effect of the person's disability; and
 - an animal is trained to meet standards of hygiene and behaviour that are appropriate for an animal in a public place?

2.6 Explain how passengers can get approval for equipment classed as 'dangerous goods'

The issue

Mobility aids powered by lithium batteries are classified as 'dangerous goods' when transported by air. Airlines have different requirements and approval processes for passengers travelling with these mobility aids.

Co-design participants want a clear and consistent process across all airlines for passengers travelling with battery-powered mobility aids. They want clear information about what must be provided to airlines and certainty about how long airlines have to decide an application.

What is the regulatory option proposed?

Airlines would be required to apply a consistent process for passengers travelling with battery-powered mobility aids, including:

- providing clear and standardised information about what passengers must provide to the airline;
- deciding requests within 48 hours, with a failure to make a decision within that timeframe treated as a refusal, and the passenger given the option of a refund or rebooking; and
- where a passenger provides the required information less than 48 hours before their flight, a requirement to still make every reasonable effort to accommodate the request (consistent with the proposed advance notice requirements in section 2.3 above).

Our view

This proposal would go some way to address the issue. However, the standards should ensure the requirements for information to be provided and the types of mobility aids that airlines need to consider, are consistent and flexible enough to accommodate the wide range of mobility aids and battery types used by people with disability.

2.7 Ensure disability aids can be transported for free and in-cabin

The issue

Airlines have different rules and processes for transporting disability aids, including mobility and medical equipment and supplies for assistance animals. There is often no consistency about which disability aids can be carried on a flight, whether they can be carried in the cabin or in the cargo hold, and what information passengers need to provide before travelling. Some passengers have been charged additional baggage fees for transporting disability aids.

What is the regulatory option proposed?

Airlines would be required to provide clear information about:

- which disability aids can be transported on flights, including which can be carried in the cabin and which must be stored in the cargo hold;
- what information passengers need to provide before travelling; and
- how long airlines will take to decide requests.

Passengers would be able to carry any disability aids they need during the flight in the cabin, in addition to their other carry-on items, or choose to have them stored in the cargo hold.

Airlines would be prohibited from counting disability aids towards a passenger's baggage allowance, meaning passengers must not be charged extra to transport disability aids.

Our view

This proposal would go some way to address the issue raised above. However, for consistency with the proposed advance notice requirements at section 2.3 above, airlines should also be required to decide requests to transport disability aids within 48 hours where the passenger has provided at least 48 hours' notice of their travel.

Questions to consider

- What types of disability aids have you been charged to travel with?
- What types of disability aids have you been required to check-in when you would have preferred for it to be in the cabin with or near you?

2.8 Explain requirements for carers or companions travelling with a person with disability

The issue

Airlines have different rules about when a passenger is considered able to travel independently, and when they must travel with a carer or companion. There is also no consistent approach to fares for carers, with some airlines offering discounts and others not.

Co-design participants want a clear and consistent approach across all airlines, so passengers know when a carer will be required. Co-design participants also said carer arrangements can change at short notice, and passengers should be able to update the booking details for a carer without extra fees.

What is the regulatory option proposed?

Airlines would be required to:

- only insist a passenger travel with a carer if the passenger is assessed as unable to travel independently and a carer is needed to ensure the safety of the passenger and others;
- provide the carer with a seat next to the passenger; and

- allow passengers to change carer details free of charge up to one hour before a domestic flight and up to three hours before an international flight.

The Government has also proposed 'guidance' recommending airlines offer discounted fares for carers or companions, particularly where the airline requires a passenger to travel with a carer.

Our view

We do not consider this proposal would provide enough consistency across airlines. The standards should clearly set out the criteria for determining when a person with disability can be required to travel with a carer, rather than leaving this to individual airline policies.

Questions to consider

- In what circumstances should a person with disability be required to travel with a carer?
- In the United States, where an airline requires a person with disability to travel with a carer, the airline must cover the cost of the carer's ticket. Do you consider this to be fair?

2.9 Clarify when airlines can ask for medical certificates

The issue

There is currently no consistent approach across airlines about when passengers are required to provide a medical clearance or certificate, or what medical conditions require one.

Co-design participants said people with disability are sometimes asked to provide medical evidence to support requests for adjustments, even where their disability or requested adjustment does not raise any safety concerns for the flight.

What is the regulatory option proposed?

Airlines would only be able to request a medical certificate when the person with disability:

- has a medical condition and there is reasonable doubt the person can fly safely without requiring extraordinary medical assistance;
- needs medical oxygen during a flight; or
- is travelling in a stretcher or incubator.

This proposal reflects requirements in the United States.

Our view

This proposal would go some way to address the issue. However, noting people with disability may be asked for medical clearance when going through security screening, the approach to medical clearance should also apply to airports.

Question to consider

- Are there any circumstances where it is appropriate for an airline or airport to ask a person with disability for a medical certificate?

2.10 Provide clear information about accessibility options before booking

The issue

Co-design participants want clear and consistent information about the accessibility of airports, aircraft and services throughout their journey. Currently this information is not always easy to find or presented consistently across airlines and airports.

What is the regulatory option proposed?

Airlines and airports would be required to provide information about the accessibility of facilities, equipment and services across the entire travel journey. This information could include:

- the maximum weight and size of mobility aids that each aircraft can carry;
- information to help passengers navigate airports, such as interactive maps;
- rules for transporting items classified as 'dangerous goods', such as batteries used in mobility aids;
- any booking restrictions (eg booking exit row seats), including the reasons those restrictions apply;
- accessibility equipment available at airports or on the aircraft, such as Eagle lifts, slide boards, wheelchairs and accessible toilets;
- assistance available during the flight, such as help storing carry-on baggage or opening food and drink packaging;
- disability supports that can be used on the aircraft, including equipment provided by the airline and equipment passengers may bring;
- information about seating, seat functions and in-flight entertainment options; and
- requirements for passengers travelling with assistance animals or carers.

Our view

This proposal would go some way to address the issue, but it would be preferable for the standards to require accessibility information to be presented in a consistent format by airlines and airports.

Question to consider

- What accessibility information would be useful to know at the time of booking a flight?

2.11 Offer information needed to book flights in accessible formats

The issue

Information needed to book flights is not always accessible or easy to use for people with disability (information at later stages of the passenger journey are in sections 3 and 4 below). Co-design participants said information about the accessibility of airports, aircrafts and services should be available in a range of formats so it can be accessed by people with different disabilities.

Co-design participants also noted that airline websites can be complex to navigate and contain too much information. They suggested that airlines provide an 'accessible mode' that presents booking information in a simpler format with only essential content.

Another concern raised was that online booking sessions can time out too quickly, not giving people with disability the time they may need to complete a booking.

What is the regulatory option proposed?

Airports and airlines would be required to provide information about the accessibility of airports, aircraft and services in a range of accessible formats, including:

- Auslan translations;
- Easy Read versions;
- Braille;
- pictorials and social stories; and
- direct support, such as a dedicated phone line or access to interpreters.

Airlines would also be required to make their booking webpages more accessible by:

- offering an accessible version of the booking webpage that contains only the information needed to book a flight; and
- providing extra time to complete an online booking where a person with disability needs a longer booking session.

Our view

This proposal would seem to address the issue raised above.

Questions to consider

- Are there other accessible formats booking information should be provided in?
- What is a minimum and accessible length of time needed to complete a booking?

2.12 Provide communication in accessible formats during disruptions

The issue

When flights are delayed, changed or cancelled, people with disability can be particularly affected if information is not provided quickly and in an accessible format. For example, a flight disruption may affect pre-arranged supports or accommodations, such as assistance services, seating arrangements or transport of mobility aids. Changes to flight times or aircraft may require these arrangements to be re-arranged or re-booked.

Co-design participants said airlines should provide clear, accessible and timely communication about flight disruptions. They also suggested that airlines offer more personalised support when rebooking passengers, to ensure people with disability are not moved to flights that cannot meet their accessibility needs.

What is the regulatory option proposed?

Airlines would be required to provide information about flight delays, cancellations and other disruptions in accessible formats (see section 2.11 above).

Airlines would also be required to specifically notify passengers with disability when a flight change affects previously arranged accessibility supports or the transport of a mobility aid. In these situations, airlines would need to provide information about alternative travel options and assistance to rebook.

Our view

This proposal would go some way to address the issue. However, it does not specify the following:

- that airlines should communicate in a passengers' preferred form; and
- the timeframe within which airlines should communicate information about disruptions, for example that airlines provide this information 'as soon as practicable'.

Question to consider

- When notifying passengers with disability about flight delays or cancellations, what communication methods should airlines use?

2.13 Communicate when passengers with disability or disability aids are not accepted for travel

The issue

Sometimes passengers with disability or their disability aids are not approved for travel, even when they have provided advance notice of their accessibility needs.

Co-design participants said airlines often provide little information about why the request was refused. They said airlines should provide clear reasons for refusals.

What is the regulatory option proposed?

If the passenger tells an airline about their accessibility needs at least 48 hours before their flight, but the airline refuses to carry the passenger or their disability aid, the airline would be required to:

- explain the reasons for the refusal at the time the decision is made and provide written reasons within 10 days; and either:
 - provide information about alternative flights on which the passenger and, where relevant, their disability aid can be accommodated, and offer to book the passenger on an alternative flight at the lower of the original fare or the new fare; or
 - provide a refund if no suitable alternative flight is available, such as where the airline determines the disability aid cannot be accommodated on any flight.

This proposal is broadly consistent with requirements in Canada and, in some respects with the United States (this proposal would go further than the United States).

Our view

This proposal would seem to address the issue raised above.

2.14 Allow people with disability to choose seats that best meet their needs

The issue

When booking seats, people with disability are not always given clear information about the seating options available to meet their needs. This can include features such as moveable armrests, aisle or window seats, and seats located close to amenities like toilets.

Some airlines also charge additional fees for seats with extra space, which means people with disability may have to pay more for seating that is necessary to accommodate their disability.

Co-design participants said airlines should reserve some suitable seats, including seats with extra space, as priority seats for people with disability for a period of time before making them available to other passengers.

Co-design participants also said airlines should provide clear information about seat dimensions, and allow passengers with disability to book seats with additional space at no extra cost where those seats are needed to accommodate their disability.

What is the regulatory option proposed?

Where a passenger informs an airline they have a disability, the airline would be required to help them identify and book a seat that meets their accessibility needs. This would include:

- providing information about the seating options available in the passenger's chosen travel class (eg Economy or Business Class), including features that may assist with accessibility, such as extra space, moveable armrests or proximity to wheelchair accessible toilets; and
- consulting with the passenger about their accessibility requirements and seating preferences, and taking those views into account before assigning a seat.

This proposal is partly based on requirements in Canada, but does not go as far as requirements in the United States.

Our view

The proposed regulatory option does not prevent airlines from charging passengers with disability extra fees for selecting a seat that is necessary to meet their accessibility needs.

It is also unclear how this proposal would work alongside the proposed requirement for airlines to allow people with disability to choose their booking method, including being able to book online

without having to call the airline (see section 2.4). If a passenger has to contact the airline to discuss seating, this may undermine that requirement.

While the proposal would require airlines to consider a passenger's views about which seat best meets their accessibility needs, this approach does not go as far as the requirements in the United States where airlines must 'honour' the seating needs of passengers with disability, rather than simply taking those preferences into account.

Question to consider

- In the United States, some airlines block seats or provide priority seating areas for people with disability. These seats are to be allocated to people with disability first, before being offered to other passengers. Would you prefer that approach is used in Australia?

3. Chapter 3: At the airport

3.1 Allow people with disability to stay in their mobility device as long as possible

The issue

Where mobility aids need to be checked-in for transport in the cargo hold, airlines do not have a consistent approach to when passengers must transfer from their own mobility aid to an airline wheelchair. Some airlines allow passengers to remain in their personal mobility aid until boarding, while others require passengers to transfer at check-in. An airline's requirements can also vary between airports.

People with disability report that when they are required to use an airline wheelchair:

- they may be left waiting for extended periods without assistance and are unable to independently access facilities such as toilets, shops or food outlets; and
- they may face an increased risk of discomfort or injury because airline wheelchairs are not designed for their needs.

Co-design participants said:

- passengers should be able to remain in their own mobility aid until the latest possible point before boarding;
- there should be a clear and consistent process across airlines and airports for when transfers occur; and
- passengers should be able to access airport facilities independently and with the same freedom as everyone else.

What is the regulatory option proposed?

Two regulatory options are being considered for when passengers must transfer from their own mobility aid to an airline wheelchair.

Option 1

Passengers would be able to keep their mobility aid until a set time before boarding, such as 30 minutes before the boarding gate closes.

If a passenger is required to use an airline wheelchair, airline or airport staff would need to stay with them and not leave them unattended for extended periods of time (eg more than 30 minutes).

Option 2

Passengers would be able to keep using their own mobility aid until it is 'absolutely necessary' to transfer, with the timing depending on the airline's operational requirements, such as its process for loading mobility aids onto the aircraft.

If a passenger is required to use an airline wheelchair, airline or airport staff would need to stay with them and not leave them unattended for extended periods of time (eg more than 30 minutes).

This option is partly based on requirements in Canada.

Our view

We do not support Option 2.

The requirement that passengers be allowed to remain in their personal mobility aid until it is 'absolutely necessary' is unclear and open to interpretation. In practice, this would allow airlines to continue requiring passengers to transfer from their personal mobility aids at check-in or well before boarding, resulting in little change to current practices. As a result, Option 2 is unlikely to address the problems issues experienced when people have to transfer out of their personal mobility aids, nor would it achieve the consistency sought.

In our view, Option 1 would better address the concerns raised by people with disability. However, Option 1 could be strengthened by adding the requirement that transfers must occur as close as possible to the door of the aircraft, unless the passenger chooses an earlier point – this would align with requirements in the United States.

Questions to consider

- For Option 1, what is an appropriate timeframe before boarding for a passenger to transfer from their personal mobility aid to an airline wheelchair?
- If a person is required to use an airline wheelchair, what is the maximum amount of time they can be left unattended before staff must provide assistance?

3.2 Provide accessible check-in facilities

The issue

Self-service facilities, such as check-in kiosks and bag drop, are not always accessible.

Co-design participants said these facilities can make it difficult for people with disability to check-in independently, request assistance or find support.

Co-design participants said check-in desks should be universally designed and at an accessible height. Currently, only 5% of information desks and check-in counters must be accessible.

What is the regulatory proposed?

Self-service facilities, including check-in kiosks and bag drop, would be required to be fully accessible in both their physical design and software. This includes:

- screens and controls that can be used by people with different disabilities;
- accessible heights for screens and loading luggage;
- voice guidance and audio prompts; and
- features that assist passengers to lift, tag and load baggage.

These facilities must be designed with people with disability (such as through the disability reference groups proposed at section 1.3 above).

Where a person is unable to use the self-service facility independently, airlines would need to ensure staff are available to provide direct assistance.

Our view

This proposal would seem to address the issue, provided the accessibility requirements apply to all self-service facilities and not only a proportion of them.

3.3 Install points throughout the airport where people can ask for assistance

The issue

Airports do not always provide clear or accessible places for passengers to obtain information or request assistance. This can lead to people with disability facing additional barriers when navigating the airport.

Co-design participants said airports should have clearly identifiable information and assistance points where people with disability can obtain tailored information and request accessibility support. They also said there should be a clear place at each departure gate where people with disability can ask questions or request assistance, particularly when flights are delayed or cancelled.

What is the regulatory option proposed?

Airports that have a minimum passenger threshold (to be determined) would be required to provide designated assistance points throughout the airport terminal. These assistance points would be located at key stages of the passenger journey, including at arrivals, check-in, security, each departure and arrival gate and baggage claim.

Assistance points would have to always be staffed during operating hours but could be a staffed assistance desk, a call button connecting directly with airport or airline staff or another mechanism.

Airports would be required to:

- clearly identify assistance points with accessible signage;
- ensure any desks, call buttons, or screens are accessible; and
- provide priority seating for people with disability near each assistance point.

Parts of this proposal are based on regulations in the European Union, which require airports to designate clearly identified points where passengers can notify the airport of their arrival and request assistance, both inside and outside terminal buildings.

Our view

This proposal would go some way to addressing the issue. However, as it would only apply to larger airports, a scaled-down version should be considered for airports below the threshold, so passengers with disability at smaller and regional airports have a way to request assistance.

Question to consider

- Should this proposal apply only to airports above a minimum passenger threshold?

3.4 Make wayfinding around airports consistent and accessible

The issue

Inconsistent signage and wayfinding can make it difficult for people with disability to navigate airports independently. Signage lacks universal design principles, with each airport using signage that reflects its branding.

Co-design participants said there should be a nationally consistent approach to wayfinding and navigation across all airports. They suggested:

- using consistent signage, colours, and symbols;
- providing information in accessible formats, including large print, high contrast and tactile signage; and
- offering additional navigation tools, such as GPS-style wayfinding apps and 'you are here' maps throughout airports.

What is the regulatory option proposed?

Two regulatory options are being considered to improve the consistency and accessibility of airport wayfinding.

Option 1: Identify and standardise signage requirements

The Australian Government would work with the aviation industry, people with disability, and other stakeholders to standardise signage and wayfinding requirements across airports.

Option 2: Airports required to test wayfinding systems with people with disability

Airports would be required to test wayfinding signage, colours, symbols and technology (such as GPS-style navigation apps) with people with disability to ensure accessible navigation.

Our view

As Option 2 may still result in different signage, symbols and navigation between airports, Option 1 would better address the need for a nationally consistent approach to wayfinding.

Testing wayfinding signage with people with disability is important and should be part of the process of developing a nationally consistent approach.

Question to consider

- What signs or information should be standardised and why?

3.5 Provide information about travel changes and disruptions in accessible formats

The issue

Flight information, such as departure gates, boarding times and delays, can change at short notice. When these updates are not communicated in accessible ways, people with disability may miss information or have difficulty responding to changes in their travel plans.

Co-design participants said information about travel changes and disruptions, including announcements and updates at boarding gates, should be provided in accessible formats. They also said airlines and airports should take a proactive approach when disruptions occur, ensuring passengers with disability receive the support they need and are not left to make alternative travel arrangements on their own.

What is the regulatory option proposed?

Airlines would be required to communicate flight changes and disruptions in accessible formats, including:

- digital display screens
- public announcements
- push notifications
- voice-to-text systems
- Easy Read
- Braille
- notifications to personal devices that are compatible with screen readers.

If information cannot be provided in a passenger's preferred format, airlines would be required to provide the information to the passenger through direct assistance.

Our view

This proposal would go some way to address the issue. However, it does not require airlines to proactively support passengers to make alternative travel arrangements.

Question to consider

- Are there other accessible formats at an airport to communicate information about flight changes and disruptions?

3.6 Improve access for arrivals and departures at the airport

The issue

Parking, drop-off and pick-up areas and connections to public transport need to be accessible.

Co-design participants said airports should:

- provide more accessible parking spaces close to terminal entrances and kerbside drop-off areas;
- ensure accessible parking, drop-off and pick-up areas have features such as ramp access, weather protection and clear signage;
- provide a sufficient number of accessible parking, drop-off and pick-up spaces based on passenger demand; and
- designate free short-term parking close to terminals for people with disability to use when arriving at or leaving the airport.

Co-design participants also said greater assistance should be available when arriving and leaving the airport, including support with baggage and transfers to ground transport.

What is the regulatory option proposed?

Airports would be required to provide:

- accessible drop-off and pick-up areas close to terminals; and
- free short-term parking close to terminals to enable pick-ups or drop-offs of people with disability that require more time, including where leaving a vehicle is necessary.

For each of the above, the number of accessible spaces available should be proportionate of the overall number of spaces provided.

Our view

In addition to providing accessible drop-off and pick-up areas and accessible short-term parking close to terminal entrances, airports should ensure public transport, taxi ranks and rideshare pick-up and drop-off locations are also located as close as possible to the terminal.

People with disability should be able to notify an airport or airline of their arrival and request assistance both inside and outside terminal buildings, as is required in the European Union.

Question to consider

- Are there other barriers for people with disability in moving from ground transport to check-in?

3.7 Provide clear information and priority for people with disability at security

The issue

Security screening can be one of the most challenging parts of air travel for people with disability. Issues include inadequate staff training, inconsistent screening procedures between airports, poor communication about what passengers can expect during screening, alternative screening methods due to a person's disability, undignified pat-downs and being physically positioned for screening without consent or explanation.

Co-design participants want:

- clearly marked priority security screening lanes for people with disability, for those who want this option;
- clear, consistent and accessible information on what to expect during screening;
- privacy and dignity protections when pat-downs or alternative screening methods are required; and
- processes that avoid separation from disability aids, assistance animals, interpreters and carers during screening.

What is the regulatory option proposed?

Airports would be required to:

- provide a clearly marked, priority security screening lane for people with disability who choose to use it. The lane should be straight and provide direct access to the screening point;
- where a smaller airport has only one security screening lane, provide priority assistance to people with disability on request;
- provide specific training for security staff to appropriately screen people with disability, including people who use mobility aids;
- provide clear and accessible information about the screening process, including what items are permitted and prohibited, using verbal and visual communication; and
- provide tactile or audio guidance to assist people who are blind or have low-vision to position themselves for screening, so they are not physically moved without their consent.

Our view

This proposal would go some way to address the issue raised.

A main part of the change needed is specific training for security screening staff. As with the proposed training at section 1.2 above, security screening staff who provide manual assistance to passengers with disability should be required to complete competency assessments.

Question to consider

- Are there other issues that should be covered in disability awareness training for security screening staff?

3.8 Involve people with disability when designing accessible facilities at airports

The issue

Accessible facilities at airports are not always available, easy to access, or designed consistently. These facilities include accessible toilets, assistance animal relief areas, lifts, quiet rooms, sensory spaces, wheelchair transfer areas and security screening rooms.

Co-design participants said there should be a consistent minimum standard of accessible facilities at all airports, including:

- multiple accessible toilets throughout the airport, such as before security screening and near boarding gates;
- private spaces where passengers can safely and comfortably transfer from their personal mobility aid to an airline wheelchair;
- quiet rooms and sensory spaces both before and after security screening;
- assistance animal relief areas located near standard toilets in both arrival and departure areas; and
- additional and larger passenger lifts.

Co-design participants also said airport upgrades and new facilities should be co-designed with people with disability.

What is the regulatory option proposed?

When airports or airlines are designing new facilities or updating existing accessible facilities and infrastructure, they would be required to consult people with disability (such as through the disability reference groups at section 1.3).

The people who will use these facilities should be involved in their design. For example, assistance animal relief areas should be co-designed with assistance animal handlers.

As part of the co-design process, airports and airlines would need to consider:

- the safety of people using the facilities;
- how easy the facilities are to find and access;
- the appropriate number of facilities needed to meet demand; and
- the location of facilities in relation to other airport services eg quiet rooms should be located near security screening.

Our view

This proposal would go some way to address the issue raised. However, it does not require specific accessible facilities to be provided or any set timeframe for when those facilities must be

available. Without this requirement, accessible facilities and their availability will continue to vary between airports.

Question to consider

- What accessible facilities are necessary at airports?

3.9 Protect disability aids from damage and loss, and track their movement

The issue

Disability aids, such as wheelchairs, are often damaged during air travel. When this happens, people with disability lose their mobility and independence. It can also disrupt travel plans and result in additional costs. Damage is often caused by inadequate staff training, or a lack of equipment and/or procedures for transporting mobility aids in the cargo hold.

Co-design participants emphasised the need to improve how disability aids are handled throughout travel. In particular, they said there should be standards for the safe loading and storage of disability aids, as well as reporting requirements and performance targets to reduce the number of mobility aids that are lost or damaged (see section 1.4).

What is the regulatory option proposed?

Airlines would be required to:

- have equipment, processes and staff training to support the safe handling and transport of mobility aids; and
- provide passengers with a way to track their disability aid after it has been handed over to the airline, such as through real-time updates by SMS, email or a mobile app.

Our view

This proposal would go some way to address the issue raised. However, it does not explain what equipment and processes airlines would be required to have. Without this level of detail, it is unclear how airlines would be assessed for compliance.

Questions to consider

- What equipment is available to protect disability aids while in cargo?
- What methods are currently used to track disability aids?

3.10 Provide choice for passenger transfer to airline wheelchairs and seats

The issue

People who use mobility aids often need to transfer between different seats several times during their journey. Passengers report these transfers are not always carried out safely or

appropriately, with problems arising because staff are not adequately trained or because transfer equipment is not suitable. This can result in transfers that are undignified and unsafe.

Co-design participants said airline staff do not always listen to passengers about their needs and how they should be transferred. They want airlines to respect people with disability as experts in their needs. They also want airlines and airports to invest in transfer equipment that is safe and consistently available across airports.

What is the regulatory option proposed?

Airlines would be required to ask passengers with disability how they would like to be transferred at each transfer point during their journey. Staff must follow the passenger's preference, taking into account the equipment and options available at the airport.

Airline staff would also be required to receive training in using airline-approved equipment for transfers.

Our view

This proposal would go some way to address the issue raised. However, it would not require airlines to have a passenger's preferred transfer method or equipment available. The standards should encourage greater consistency in transfer methods and equipment across airports.

At a minimum, airlines should be required to publish information about the transfer methods and equipment available at each airport, to enable people to make informed choices.

Question to consider

- What minimum methods of transfer should airlines provide?

4. Chapter 4: On the aircraft

4.1 Make it easier for people with disability to board and leave the aircraft

The issue

Airlines and airports do not currently provide consistent equipment to ensure step-free access to aircraft for people with disability. Co-design participants want safe, step-free boarding and disembarkation at all airports. They highlighted the need for accessible boarding equipment, such as passenger lifts and ramps, particularly at regional airports where aerobridges are less common.

Participants also raised concerns about current boarding and disembarking practices. Passengers who need boarding assistance are often required to board the aircraft before other passengers and leave the aircraft after everyone else. Many people with disability experience pain and discomfort when required to sit in aircraft seats or airline wheelchairs that do not meet their individual needs.

Co-design participants also noted that when a passenger with disability is seated in an aisle seat after boarding first, other passengers may need to ‘climb over’ them to access their seat, which can be uncomfortable and undignifying. Co-design participants said passengers with disability should have greater choice about when they board and disembark, including the option to board early if they need extra time or space, without being required to do so in every case.

What is the regulatory option proposed?

Airlines would need to ensure there is no gap or step between a boarding device (eg aerobridge, ramp or passenger lift) and the aircraft. If there is a gap or step, the airline would need to provide an alternative boarding device or provide direct assistance (this cannot be hand-carrying a passenger).

Airlines would also need to give passengers with disability a choice about when they board and disembark. However, if a passenger with disability requires assistance to board or disembark (for example, an aisle chair or eagle lift), an airline may require that passenger to board before other passengers or leave the aircraft after everyone else.

This proposal is partly based on regulations in Canada.

Our view

This proposal would go some way to address the issue. However, the exception that allows airlines to continue requiring some passengers with disability to board first and disembark last would not address the concerns raised above. Many passengers who require boarding assistance would continue to have little or no choice about when they board or disembark.

Question to consider

- Where aerobridges are unavailable what are the preferred methods and types of step-free access to enter and leave an aircraft (for example, ramps and lifts)?

4.2 Support passengers to store disability aids in the cabin

The issue

People with disability who travel with disability aids, including medical equipment, are not always able to keep those aids in the aircraft cabin or access them during the flight when needed.

Co-design participants said people who travel with disability aids should be given the option to board before other passengers so they can have priority access to store these items in the cabin, over other passengers.

What is the regulatory option proposed?

For disability aids and medical equipment allowed in the aircraft cabin:

- passengers travelling with disability aids would have the option to board before other passengers, so they have priority access to store their aids;

- cabin crew would be required to help passengers with disability to store and retrieve their disability aids, with those aids stored as close as possible to the passenger; and
- on aircraft with more than 100 seats, airlines would be required to provide priority space for at least one adult-size manual wheelchair, such as a storage closet or seating area where the wheelchair can be safely tied.

This proposal is partly based on regulations in the United States.

Our view

This proposal seems to address the issue raised above.

Question to consider

- Are there disability aids for which information is not clear about whether it can be stored in the aircraft?
- Would it help to have a list of disability aids that can and cannot be taken in the cabin?

4.3 Allow people to use their disability aids onboard

The issue

Co-design participants said airlines do not provide clear information about which disability aids can be taken into and used in the aircraft cabin. This can include items such as crutches, medical devices, assistance animal and specialist support harnesses. For example, it is not clear whether passengers with an assistance animal can keep the animal on their lap to provide support during the flight.

Co-design participants also said that approval processes for bringing and using these types of disability aids in the cabin vary between airlines.

What is the regulatory option proposed?

Airlines would be required to:

- allow passengers to use their disability aids during a flight wherever it is safe and practical;
- provide clear information about when disability aids must be secured or stored (eg take-off, landing or periods of turbulence), and make reasonable adjustments so passengers can access their disability aids;
- implement a clear, consistent and timely process for assessing and approving disability aids that require prior approval, such as specialist support harnesses. Staff would be trained to apply these processes; and
- provide clear and accessible information about their policies on disability aids, including making this information available in accessible formats on request.

Our view

This proposal would go some way to address the issue raised above. However, for consistency with the proposed advance notice requirements at section 2.3 above, airlines should also be

required to decide applications about disability aids that require prior approval within 48 hours where the passenger has provided at least 48 hours' notice of their travel.

Also, airlines should be required to provide information about the disability aids it can provide to passengers, such as a support harness.

Questions to consider

- What types of disability aids do people rely on during a flight?
- Are there disability aids that you have not been able to use during a flight?

4.4 Return mobility aids as soon as possible on arrival

The issue

Some mobility aids must be transported in the cargo hold and may need to be disassembled for that purpose. Passengers have reported that, on arrival at their destination, their mobility aids are sometimes returned after significant delays and/or without being reassembled.

Co-design participants strongly supported requirements for mobility aids to be returned and reassembled as quickly as possible after arrival. This would help minimise delays and leaving passengers waiting in unsuitable seating that does not meet their needs.

What is the regulatory option proposed?

Airlines would be required to:

- return mobility aids stored in the cargo hold to passengers as quickly as possible after arrival, as is required in Canada;
- treat mobility aids as priority items so they are among the first items retrieved from the cargo hold, as is the case in the United States; and
- where possible, allow passengers to choose whether their mobility aid is returned at the arrival gate or at baggage claim.

If a mobility aid is disassembled for transport:

- airlines should reassemble it before returning it to the passenger, as is required in Canada and the United States;
- airlines should return mobility aids in the same condition in which they were received, as is required in the United States; and
- passengers may be asked to provide written instructions for disassembling and reassembling their mobility aids, with staff to follow these instructions where practicable.

Airports would also be required to provide facilities, such as baggage lifts, to support the prompt return of mobility aids.

Our view

While this proposal would go some way to address the issue raised above, it is unlikely to deliver consistent outcomes across airlines and airports or ensure that passengers are not left in unsuitable seating waiting for their mobility aid.

The requirement to return mobility aids ‘as quickly as possible after arrival’ is unclear and open to interpretation. Similarly, allowing passengers to choose whether their mobility aid is returned at the arrival gate or baggage claim only ‘where possible’ does not provide certainty about when or where they will receive it. As a result, the proposal may lead to little change in current practices.

In our view, the standards should require airlines to return mobility aids within a set time after arrival, such as 30 minutes – this would be consistent with Option 1 proposed at section 3.1 above.

The proposal could also be strengthened by adopting elements of overseas regulations. For example, in the United States, airlines must return mobility aids as close as possible to the aircraft door, unless the passenger requests otherwise. In the European Union, passengers should receive their mobility aid immediately after disembarking and should not be required to retrieve it at baggage claim.

Question to consider

- Should a timeframe for return of mobility aids be specified? If so, what is an appropriate timeframe?

4.5 Provide critical in-flight information in accessible formats

The issue

Important information provided during a flight, including safety instructions, is not always available in formats that are accessible to people with disability. Co-design participants said airlines should provide in-flight information through an app that can be accessed on a passenger’s own device or on devices provided by the airline. They said this information should be available in a range of formats, including with captions and Auslan translations.

Co-design participants also said passengers who rely on communication devices should be able to access free Wi-Fi during the flight so they can use those devices.

What is the regulatory option proposed?

Airlines would be required to:

- provide passengers with critical flight information before take-off in a range of accessible formats, including Easy Read, Braille and Auslan. This information could be provided through pre-recorded audio and video;
- ensure this information includes emergency procedures, flight updates, on-board facilities and how passengers can access and use those facilities; and
- provide free Wi-Fi to passengers with disability where it is needed to use communication devices during the flight.

This proposal is partly based on regulations in Canada, the European Union and the United States.

Our view

This proposal seems to address the issue raised above.

Questions to consider

- What accessible formats are needed to communicate information during a flight? Would pre-recorded audio and video meet these needs?
- Is Wi-Fi needed to support communication devices in the aircraft?

4.6 Make in-flight food and drink more accessible

The issue

In-flight food and drink services are not always accessible for passengers with disability. For example, menus may only be available in written form. Also, some passengers may be unable to open food and drink packaging or may require stronger metal cutlery.

Co-design participants said airlines should ensure food and drink services are accessible and suggested:

- providing food and drink information in accessible formats;
- assisting passengers to open food and drink packaging when needed;
- explaining where food, drinks and other items have been placed on the tray table; and
- providing more accessible utensils, such as sturdier cutlery, to make eating easier.

What is the regulatory option proposed?

Airlines would be required to:

- provide in-flight menu information in large print, Braille and direct assistance where requested;
- help passengers open food and drink packaging when needed;
- when serving a meal, explain what food and drinks have been provided and where they have been placed on the tray table.

This proposal is partly based on regulations in Canada, the European Union and the United States.

However, airlines would not be required to cut up food or assist passengers to eat or drink. This contrasts with Canadian regulations which require cabin crew to help with cutting up large food portions.

Our view

This proposal seems to address the issue raised above.

4.7 Improve accessibility of aircraft toilets

The issue

The lack of accessible toilets on aircraft can be a significant barrier for people with disability. It can affect a person's independence, safety and dignity.

Current laws require only twin-aisle aircraft to have at least one accessible toilet that can be accessed using an on-board wheelchair.

What is the regulatory option proposed?

The standards would introduce accessibility requirements in two stages.

Stage 1

When toilets on an aircraft undergo a major refurbishment, or when an airline gets a new aircraft after a specified date, at least one toilet would be required to include accessibility features such as:

- a tactile map showing the location of facilities;
- Braille signage;
- door handles, locks, taps, soap dispensers and toilet flush controls that can be used easily and with one hand, or that operate automatically;
- grab rails; and
- an emergency call button.

This proposal is partly based on requirements in Canada and the United States.

Stage 2

New single-aisle aircraft that have a minimum seating threshold (to be determined) and are ordered after a specified date, would be required to have at least one toilet that:

- can be accessed by a passenger using an on-board wheelchair; and
- provides sufficient private space for a passenger to be assisted by a carer.

This is already a requirement in the United States, where from 2026, accessible toilets are required on all new single-aisle aircraft carrying at least 125 people.

Our view

While this proposal would go some way to address the issue raised above, the requirements would only apply when aircraft are refurbished or replaced. This means passengers with disability will likely wait many years before these changes are made, prolonging the barriers faced by some people with disability.

At a minimum, the standards should include clear timeframes for implementation, to ensure accessibility improvements are not dependent on aircraft replacement or refurbishment cycles.

Questions to consider

- What should be the timeframe for Stage 1 of these regulations to come into effect?
- What should be the timeframe for Stage 2 of these regulations to come into effect?

4.8 Make in-flight entertainment accessible

The issue

Currently, there is no requirement for digital in-flight entertainment systems to be accessible.

Co-design participants said digital in-flight entertainment should be available in accessible formats, so passengers with disability have the same access as everyone else.

What is the regulatory option proposed?

Airlines would be required to ensure all digital in-flight entertainment systems are accessible to people with disability. This would include:

- providing closed captions and audio descriptions; and
- ensuring the entertainment system and controls can be used by passengers with a range of disabilities.

Where an airline's in-flight entertainment system is not accessible, the airline would need to:

- provide a portable electronic device with accessible entertainment content that is the same or comparable to the content available to other passengers; and
- have enough of these devices to provide to any passenger with disability who requests it.

This proposal is similar to requirements in Canada and the European Union.

Our view

This proposal seems to address the issue raised above.

Question to consider

- Are there any accessibility features that in-flight entertainment should offer beyond WCAG compliance, closed captioning and audio description?

4.9 Require aircraft to have accessible passenger controls

The issue

Co-design participants said many controls used by passengers during a flight are not accessible. This includes controls or buttons for calling airline staff, adjusting air conditioning and lighting, reclining seats and using in-flight entertainment.

Co-design participants said these controls should be easier to reach and operate, by moving the position of these controls to lower or more accessible locations and designed so they can be used with minimal force.

Airlines noted that the location and design of some controls are determined by aircraft manufacturers, which may limit the changes airlines can make themselves.

What is the regulatory option proposed?

When an aircraft undergoes a major refurbishment, or when an airline orders a new aircraft after a specific date that has capacity above a minimum seating threshold (to be determined), there would be a requirement to include accessible passenger controls. These controls would have to be easy for passengers with disability to locate, reach and use and would apply to:

- call buttons that are easy to see, feel and press;
- seatback screens;
- in-flight entertainment;
- lighting;
- adjusting air conditioning; and
- reclining seats.

This proposal is partly based on requirements in Canada.

Our view

While this proposal would go some way to address the issue, the requirements would only apply when aircraft are refurbished or replaced. This means passengers with disability will likely wait many years before these changes are made, prolonging the barriers faced by people with disability.

At a minimum, the standards should include clear timeframes for implementation, to ensure accessibility improvements are not dependent solely on aircraft replacement or refurbishment cycles.

Questions to consider

- What should be the timeframe for these changes to come into effect?
- How can the following controls be made more accessible: seatback screens, in flight entertainment, lighting, air conditioning, and reclining seats?
- Are there other controls not listed in this section which should be made more accessible?

4.10 Increase the number of aircraft seats with movable armrests

The issue

Co-design participants said transferring to and from aircraft seats can be difficult or impossible when seats have fixed armrests, particularly aisle seats. The availability of moveable armrests varies between airlines, aircrafts, seat types (aisle, middle and window) and across travel classes.

Co-design participants also noted that information about which seats have moveable armrests is not available when booking a flight. They said passengers should be able to access this information at the time of booking.

What is the regulatory option proposed?

Three regulatory options are being considered to regulate the number of seats on aircraft that must be required to have moveable armrests.

Under all three options, airlines would be required to provide information about which seats have moveable armrests, so passengers can access this information when booking a flight.

Option 1

New aircraft ordered after a specified date and existing aircraft undergoing major seat refurbishment would be required to have moveable armrests on **all seats**, across all travel classes.

Option 2

New aircraft ordered after a specified date and existing aircraft undergoing major seat refurbishment would be required to have moveable armrests on at least **50% of seats**, across all travel classes.

Option 3

New aircraft ordered after a specified date and existing aircraft undergoing major seat refurbishment would be required to have moveable armrests on **all aisle seats**.

Our view

While Option 1 would best address the issue raised above, it would only apply when aircraft seats are refurbished or aircraft are replaced. This means passengers with disability will likely wait many years before these changes are made.

Options 2 and 3 would improve accessibility but still leave many seats with fixed armrests, which could limit seating choices.

At a minimum, the standards should include clear timeframes for implementation to ensure accessibility improvements are not dependent solely on aircraft replacement or refurbishment cycles.

Question to consider

- For each of the three options, what should be the timeframe for moveable armrests to come into effect?