

Submission – Aviation Green Paper



QUEENSLANDERS WITH DISABILITY NETWORK
NOTHING ABOUT US WITHOUT US

Submitted to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts

November 2023

About Queenslanders with Disability Network (QDN)

Queenslanders with Disability Network (QDN) is an organisation of, for, and with people with disability. The organisation's motto is "nothing about us without us". QDN operates a state-wide network of over 2,000 members and supporters and almost 30 peer support groups around the state who provide information, feedback and views from a consumer perspective to inform systemic disability policy and disability advocacy.

Introduction and acknowledgements

QDN welcomes the opportunity to make a submission to the Aviation Green Paper – Towards 2050 (2023).

It is broadly acknowledged that people with disability face risks, barriers and impacts in relation to many areas of their lives that people without disability do not. This relates not only to their health and disability needs but is also impacted by individual and contextual factors such as age, gender, LGBTIQ+ status, socio-economic status, family environment, where someone lives, whether they are Aboriginal or Torres Strait Islander and whether they are from culturally and linguistically diverse backgrounds. These risks, barriers and impacts are further compounded when systems and structures such as transport are designed in ways that exclude people with disability and further isolate them.

QDN also acknowledges Australia's commitments to upholding the United Nations Convention on the Rights of Persons with Disability (CRPD) and Australia's Disability Strategy 2021-2031.

In making our submission, QDN acknowledges the expertise of our members across Queensland. This submission involved drawing on the stories of member views and lived experience of aviation usage to inform our response.

QDN also acknowledges the tireless work of QDN Life Member John McPherson for his expertise in accessibility standards in general, but particularly the importance of people with disability having access to reliable, accessible and safe aviation experiences. John's knowledge and professional work in this space informs this submission and influences the future provision of accessible transport.

QDN Response to Section 3.3 – Disability Access

What further improvements can be made to the Standards for Accessible Public Transport to accommodate the unique requirements of air travel?

Wheelchair carriage policy

The Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (the Royal Commission) identified the limitation of carrying two wheelchairs only per flight as a concern¹. Aircraft holds differ in capacity, which limits the amount of cargo carried by different models of aircraft. Mobility aids also differ in size therefore the number of mobility aids carried per flight will vary. QDN acknowledges that the Department of Infrastructure, Transport, Regional Development, Communications and the Arts has updated guidance advice for airlines to adapt a more flexible approach rather than imposing a strict limit of two passengers requiring mobility aid assistance per flight². However, Jetstar continue to state a two wheelchair per flight limitation on their site³ whereas other airlines flying similar aircraft do not. This inconsistency is confusing for travellers and should be addressed in the review of the Disability Standards for Accessible Public Transport (DSAPT).

QDN recommends a co-design process with people with disability who have lived experience of air travel to bring their expertise to inform improvements to the Standards for Accessible Public Transport. A co-design process with all stakeholders will provide an opportunity for realistic numbers of mobility aids, relevant to aircraft cargo hold capacity and mobility aid size to be agreed on.

Wheelchair and mobility aid dimensions

Airlines impose dimensional limits on mobility aids that differ from the assumptions stated in The *Disability Standards for Accessible Public Transport Guidelines 2004 (No 3)* (DSAPT Guidelines) Part 40. This matter requires resolution, with realistic dimensions relative to aircraft cargo hold carrying capacity being stated in the DSAPT.

A co-design process involving all stakeholders would enable the establishment of practical measurements aligned with the aircraft's cargo hold capacity, rather than being determined solely by individual airline policies.

The DSAPT Guidelines Part 40 provides dimensions for mobility aids that people with disability refer to when selecting mobility aids. An excerpt states:

Part 40 Assumptions about public transport mobility aids

40.1 Criteria for mobility aids in Disability Standards

The following criteria reflect assumptions underlying the Disability Standards. They are useful as a guide for designers of mobility aids.

¹ [Workshops find people with disability an afterthought in domestic air travel | Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability](#)

² [Review of airline two wheelchair policies | Department of Infrastructure, Transport, Regional Development, Communications and the Arts](#)

³ [Limits on assistance and mobility aids | Jetstar](#)

Intending passengers should also consider these criteria when purchasing a mobility aid for use on public transport.

Width The overall width of the mobility aid needs to be less than 800 mm.

Allocated space The space for stationary mobility aids is 800 mm wide by 1300 mm long.

All passenger aircraft currently used by major airlines accommodate the 800 mm limit on mobility aid width (See Table 1).

All turboprop aircraft and most narrow-bodied jets failed to accommodate mobility aids of up to 1300 mm length (See Table 1). The outlier was Jetstar's A320 and A321 aircraft which can accommodate a mobility aid of up to 1400 mm. It is not clear as to why the A320s of other carriers cannot match Jetstar A320 length limits.

All wide-bodied jets easily accommodate a mobility aid of up to 1300 mm x 800 mm (See Table 1).

Table 1. Mobility aid dimensions by aircraft. Airlines are Rex⁴, Virgin⁵, Qantas⁶, Alliance⁷, Network Aviation⁸ and Jetstar⁹.

Aircraft	Airline	Width (mm)	Height (mm)	Length (mm)
Saab 340	Rex	850	1300	1150
Saab 340	Virgin Australia	850	1300	1150
Bombardier Dash 8	Qantas	850	1300	1150
Fokker 70	Virgin Australia	1000	650	1250
Embraer 190*	Alliance	1000	840	1250
Fokker 100	Virgin Australia	1000	650	1250
Fokker 100	Network Aviation	1250	630	1250
Fokker 100*	Alliance	1000	650	1250
Boeing 717	Qantas	1290	690	1000
Boeing 737	Rex	1000	840	1250
Boeing 737	Qantas	1000	840	1250
Boeing 737	Virgin Australia	1000	840	1250
Airbus A320	Jetstar	1400	1000	1400
Airbus A320	Virgin Australia ¹⁰	1000	840	1250
Airbus A321	Jetstar	1400	1000	1400

Wheelchair and mobility aid mass

Mass limits for mobility aids carried as cargo needs to be included in the DSAPT. Currently, DSAPT mobility aid mass limits relate to the carrying capacity of boarding devices rather than conveyances.

⁴ [Special Requirements \(rex.com.au\)](http://rex.com.au)

⁵ [Mobility assistance | Virgin Australia](#)

⁶ [Mobility assistance, wheelchair access, crutches | Qantas](#)

⁷ [Mobility assistance, wheelchair access, crutches | Qantas](#)

⁸ [Mobility assistance, wheelchair access, crutches | Qantas](#)

⁹ [Limits on assistance and mobility aids | Jetstar](#)

¹⁰ [Mobility assistance | Virgin Australia](#)

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Intending passengers should also consider these criteria when purchasing a mobility aid for use on public transport.

Weight The total weight to be supported by a boarding device needs to be not more than 300kg.

As per dimensional limits, a co-design process involving all stakeholders would allow realistic mobility aid mass limits that were relevant to aircraft carrying capacity, rather than individual airline policy, to be agreed.

Motorised mobility aids such as electric wheelchairs are often heavy. Twelve popular models listed by the Independent Living Specialists¹¹ weigh between 100kg and 149kg.

Both Rex Airlines and Alliance Airlines place 120kg limits on mobility aids. Rex operates Saab 340 and Boeing 737-800 aircraft. Alliance flies Fokker 100 and Embraer 190 aircraft.

The Rex - Disability Access Facilitation Plan v3.21¹² states:

Aircraft Space Availability for Wheelchair

Rex cannot uplift a wheelchair in excess of 120kg in weight. Wheelchairs weighing in excess of 120kg may still be carried only if they can be broken down into parts each weighing not more than 120kg and only if space and weight is available for the uplift.

The Qantas website¹³ states:

Mobility Aid Maximum weight limit for Mobility Aids for Alliance Aircraft E-190 and F100 is 120kg.

Other carriers operating similar sized aircraft do not state upper weight limits, though these may exist.

Passengers are instructed by most carriers to identify the weight of the mobility aid when booking, at which time weight limits may be discussed. This can lead to refusals at booking and does little to promote certainty for passengers.

For example, Jetstar state:

Maximum weight for mobility aids and wheelchairs as checked baggage

Each item must be 32kg or less, except for wheelchairs or mobility aids that can travel in the upright position in freewheel mode (which may exceed 32kg).¹⁴

¹¹ [Electric Wheelchairs - Shop Electric & Power Wheelchairs Online \(ilsau.com.au\)](http://ilsau.com.au)

¹² [DISABILITY ACCESS FACILITATION PLAN \(rex.com.au\)](http://rex.com.au)

¹³ [Mobility assistance, wheelchair access, crutches | Qantas](http://qantas.com.au)

¹⁴ [Limits on assistance and mobility aids | Jetstar](http://jetstar.com.au)

You or your travel agent must telephone us on 131 538 to advise us of the details of the mobility aid you are checking-in (for example, if you are not checking-in a wheelchair or if you are checking-in a manual or electric wheelchair, the battery type and the weight of the wheelchair if it weighs more than 32kg) or require your travel agent to telephone us on 131 538 to provide this information.

Both CASA and the AAF advise this pre-flight contact to discuss mobility aid weight—among other matters.

Booking your flight¹⁵

Before booking your flight, think about what you need so you can choose the airline that best suits you. Ask about:

- transporting a wheelchair and the battery, if you have one.

3. Booking Your Flight¹⁶

3.1 Advance Notification Requirements

Passengers with disability who intend to travel with mobility aids should provide the airline with at least 48 hours advance notice. When booking your flight, always specify that you will require assistance when you travel.

When notifying the airline that you require assistance when travelling, you may be asked to provide the following information:

- number of mobility aids;
- type of mobility aid;
- size dimensions of mobility aid;
- weight of mobility aid;
- type of battery, if battery-powered;
- whether the aid is collapsible or foldable; and
- any arrangements that will be required whilst without mobility aid.

Including mass limits for aircraft types in DSAPT would provide both the aviation industry and passengers with a clear sense of assurance.

Security screening

The Royal Commission workshops identified poor practice at security check points as a barrier¹⁷. Media articles have highlighted the same issue¹⁸ and QDN has heard from members about negative and humiliating experiences at security check points.

DSAPT only mentions security screening in Section 12.1(2). This Section states that direct assistance may be required to transit security check points. The DSAPT Guidelines do not mention security check points and associated processes.

¹⁵ [Planning for travel with a disability | Civil Aviation Safety Authority \(casa.gov.au\)](https://www.casa.gov.au/Planning-for-travel-with-a-disability)

¹⁶ [Carriage of mobility aids guidance material for passengers | Department of Infrastructure, Transport, Regional Development, Communications and the Arts](#)

¹⁷ [Air travel workshops | Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability](#)

¹⁸ [Former disability discrimination commissioner Graeme Innes calls for change after 'humiliating' Adelaide Airport experience - ABC News](#)

12.1 Doors on access paths

(1) Any doors along an access path must not present a barrier to independent passenger travel.

(2) Direct assistance may be provided through security check points.

Conveyances; except dedicated school buses and small aircraft

Premises

Infrastructure; except airports that do not accept regular public transport services.

Navigating security screening at airports can be stressful for anybody. Negative experiences of security screening have been felt by a people with a diverse range of disabilities¹⁹. Security screening can be overstimulating and anxiety-inducing for neurodivergent people with sensory needs and struggles for children with autism can also relate to separation anxiety when told they need to separate from their parent or caregiver to go through security screening. People with intellectual disability may not receive explanations of processes in a way that they can comprehend completely. Speaking and having written instructions in Plain English accompanied by Easy Read diagrams may assist with this. Considerations that need to be made by staff for people with disability to have a safe and dignified experience of security screening include allowing more time around security processes, security staff having/adopting a curious, patient, and friendly approach towards passengers and security staff accommodating the needs of the passenger to the best of their ability. The requirement for security staff competence and awareness of how to assist passengers who have a disability should be explicit in the reformed DSAPT. QDN recommends processes and training programs be co-designed by all stakeholders. Requirements for security staff competencies should also be included in a Customer Rights Charter.

Assessing the attitudes of staff needs to be prioritised with Disability Awareness Training and/or unconscious bias training. QDN's Disability Awareness Training and similar programs could support airlines and airports to address unconscious bias.

Staff competency

The Royal Commission workshops identified poorly trained airline and airport staff as a disincentive and barrier to successful travel²⁰. Multiple media articles (see pp. 22-23) and QDN members' experiences have highlighted the same issue.

Staff training and customer service are covered in the DSAPT Guidelines *Part 37 Customer service*. The DSAPT-2002 does not mention staff training however it would appear to be implicit in Section 1.2

Purpose of Standards:

1.2 Purpose of Standards

(1) The Disability Discrimination Act 1992 seeks to eliminate discrimination, 'as far as possible', against people with disabilities. Public transport is a service covered by the Disability Discrimination Act 1992.

(2) The purpose of these Standards is to enable public transport operators and providers to remove discrimination from public transport services.

¹⁹ [Airports and airlines on notice after people with disability speak out about humiliating treatment - ABC News](#)

²⁰ [Air travel workshops | Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability](#)

The requirement for airline and airport staff competence and awareness of how to assist passengers who have a disability should be explicit in the reformed DSAPT. QDN recommends processes and training programs should be co-designed with all stakeholders. Requirements for staff competencies should also be included in a Customer Rights Charter.

Information

The Royal Commission workshops identified poor provision of information at all stages of a journey—from planning / booking to destination—as a barrier to travel²¹. The DSAPT already covers information in *Part 27 Information*:

Part 27 Information

27.1 Access to information about transport services

General information about transport services must be accessible to all passengers.

Conveyances

Premises

Infrastructure

QDN recommends expanding Part 27 to better specify how and when information must be provided. It should stress that information must be available in multiple accessible formats and that less commonly requested formats must be provided in a timely manner. Reference in DSAPT Part 27 to material in the DSAPT Guidelines would be helpful.

The DSAPT Guidelines 2004 (No 3) provide useful information however the feedback to the Royal Commission indicates the Guidelines may not always be referred to by operators and providers.

1.15 Disabilities other than physical disabilities

While the Disability Standards include specific criteria for some physical disabilities, operators and providers need to be equally mindful of removing discrimination against people with medical, intellectual, behavioural and emotional disabilities. In this regard, operators and providers should avoid attitudinal or informational barriers that limit the accessibility of public transport for some passengers.

1.18 Explaining and understanding networks

(2) Operators have an obligation to ensure that information about their service is presented in a way that passengers can understand. However, operators may also choose to give assistance to individuals.

1.26 Publicity

Information is an essential component of any public transport system. The Disability Standards assume that information about accessible public transport services will be readily available.

Minimum literacy and language skills are referenced in the DSAPT Guidelines Section 27.1 however are undefined. A person may be fluent in Auslan—a distinct language—but have poor English literacy skills. Equally, visual information will not serve people who are vision impaired or who have certain cognitive disabilities, however digital or audio information may serve them well.

²¹ [Air travel workshops | Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability](#)

Greater clarity of DSAPT Guidelines *Part 27 Information* would improve understanding for all stakeholders. A direct reference to Part 27 in the DSAPT Guidelines, located in the DSAPT's Part 27, would give the Guidelines a much greater degree of authority.

Part 27 Information

27.1 Assumption of minimum literacy and language standards

- (1) The Disability Standards provide that operators or providers will supply all passengers with information necessary to use a transport service.
- (2) However, the Disability Standards assume that passengers have a minimum level of literacy and language skills.

Formats have changed since 2002 and Part 27.2 needs updating. Easy English should be added and audiovisual material should conform to WCAG 2.1 AAA for example. This is often done—and is easily achieved at little extra cost—but is not provided consistently.

27.2 Formats for providing information

- (1) Operators and providers should expect requests for information in formats such as standard or large print, Braille, audio, touch-tone telephone, TTY and on-line computer or disks.
- (3) If it is not possible for operators or providers to supply information in a particular format, passengers may expect assistance to be provided to enable them to use documentation in the available formats, for example, the provision of a photocopy enlargement of a timetable.
- (4) However, essential travel and safety information, such as emergency instructions on aircraft, must be available in an accessible format or direct assistance must be given.

Access to information during service disruptions was identified by the Royal Commission. The existing material in the DSAPT Guidelines should be strengthened and made more explicit.

33.11 Assistance while travelling

Once on board, passengers with disabilities may request assistance with:

- (c) information or advice if there is an unscheduled change to services, or the timeframe does not allow for information to be provided in a preferred format.

Transfer between aisle chair and seat

The Royal Commission identified 'Limited access to safe ramps and hoists to accommodate wheelchair users'²² as a barrier to safe travel. The DSAPT-2002 mentions boarding devices but not specifically devices that allow transfer between aisle chairs and fixed seats. Rather, the DSAPT Guidelines in Section 33.10 state what 'can' be done by an airline in this transfer process. This guidance offered in Section 33.10 should be made a requirement in DSAPT.

33.10 Assistance during boarding and alighting

(1) People with disabilities can be assisted to board or alight from conveyances, such as coaches and aircraft, through the provision of:

- (a) mobility aids on conveyances where design constraints prevent use of a person's own mobility aid; or

²² [Air travel workshops | Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability](#)

(b) assistance in moving from a wheelchair into a fixed seat if an allocated space is not provided.

The means of ‘moving from a wheelchair into a fixed seat’ has been variously interpreted. It ranges from a passenger providing a travelling Carer on some regional services to airlines providing Eagle lifters at larger airports. Eagle lifters can be used in narrow-bodied jets of some airlines but not others. For example, Jetstar offers a slide board instead of Eagle lifters in a wide-bodied Boeing 787.

QDN suggests the need for a co-design process to address this inconsistency and establish a level of consistency in what can reasonably be anticipated in aisle chair to fixed seat transfers. All stakeholders should participate, and the outcome incorporated into DSAPT.

Access to airline toilets

QDN members have reported challenges using toilets on flights including not being seated close to accessible toilets and rigid policies and procedures around providing the most accessible pathways to toilets. Additionally, some members have reported instances of airline staff not being adequately trained to assist people with disability and being inflexible in providing accessible pathways to toilets leading to negative and humiliating experiences.

Brisbane Airport has installed ‘Changing Places’²³ facilities, which provide additional space and specialised equipment including a hoist, adult changing table as well as a toilet with movable handrails. This type of broader scale accessibility of bathroom facilities should be widely adopted to dismantle barriers to travel for people with varying disabilities and personal care needs.

QDN recommends airlines address these issues through disability awareness training for staff to build understanding on how to respond in an inclusive and accessible way in different scenarios. Training programs should be co-designed with people with disability. Furthermore, QDN recommends reviewing airline policies and procedures around providing easy and accessible access to toilets for people with mobility issues including access to business class toilets if that is the closest option.

Co-design included in Equivalent Access

Equivalent Access is a useful process that allows operators and providers the opportunity to innovate beyond minimum prescribed standards. Currently Section 33.4 of the DSAPT-2002 covers the need to consult on Equivalent Access solutions.

33.4 Consultation about proposals for equivalent access

The operator or provider of a public transport service must consult with passengers with disabilities who use the service, or with organisations representing people with disabilities, about any proposal for equivalent access.

Consultation is not as effective as co-design. Consultation asks questions, co-design delivers outcomes. QDN suggests redrafting Section 33.4 to require co-design rather than just consultation.

Co-design better aligns with Australia’s responsibilities under the Preamble and Article 4 of the CRPD and Optional Protocol.

²³ [Brisbane Airport breaking down barriers for travellers with disabilities \(bne.com.au\)](http://bne.com.au)

Preamble

The States Parties to the present Convention

(o) *Considering* that persons with disabilities should have the opportunity to be actively involved in decision-making processes about policies and programmes, including those directly concerning them,

Article 4 General obligations

1. States Parties undertake to ensure and promote the full realization of all human rights and fundamental freedoms for all persons with disabilities without discrimination of any kind on the basis of disability. To this end, States Parties undertake:

(e) To take all appropriate measures to eliminate discrimination on the basis of disability by any person, organization or private enterprise;

3. In the development and implementation of legislation and policies to implement the present Convention, and in other decision-making processes concerning issues relating to persons with disabilities, States Parties shall closely consult with and actively involve persons with disabilities, including children with disabilities, through their representative organizations.

Wayfinding

While there is mention of support for wayfinding in the DSAPT-2002, this is mainly in relation to public transport such as buses. In 2019, Sydney Airport became the first Australian airport to offer navigation services for people with vision impairment and blindness²⁴. This year, the Sunshine Coast Airport has become the first airport in Australia to install BindiMaps to improve accessibility for people with vision impairment and blindness²⁵. Some Australian airports also have Braille signage installed²⁶. QDN suggests implementing universal standards around accessibility of airports in Australia. There should be a range of supports for people with vision impairment and blindness, navigation services, as much Braille signage as possible, and a requirement for airports to register with and promote apps such as Cérge, to connect people with disability with information about accessibility at each airport they visit.

Assistance Animals

Accredited assistance animals²⁷ are not well considered in the DSAPT-2002. The Disability Discrimination Act (DDA) spells out rights of access for people accompanied by assistance animals in *Section 8 Discrimination in relation to carers, assistants, assistance animals and disability aids* and defines assistance animals in *Section 9 Carer, assistant, assistance animal and disability aid definitions*.

As a Disability Standard the DSAPT should be clear that:

- Accredited assistance animals have full right of access to all public places.
- Accredited assistance animals cannot be refused access to a booked or unbooked conveyance.

²⁴ <https://www.sydneyairport.com.au/corporate/media/corporate-newsroom/sydney-airport-first-australian-airport-to-offer-navigation-service-for-visually-impaired>

²⁵ <https://www.sunshinecoastairport.com.au/2023/10/24/sunshine-coast-airport-first-airport-to-install-bindimaps/>

²⁶ https://www.singaporeair.com/zh_CN/cn/travel-info/customer-commitment/pax-rights-regulations/australia/equal-access-plan-australia/australian-airport-information/

²⁷ [Assistance animals and the Disability Discrimination Act 1992 \(Cth\) | Australian Human Rights Commission](#)

- Accredited assistance animals and their handlers should not be separated.
- Evidence of accreditation can be requested by the operator or provider.

Most of the points above have been dealt with in the DDA and in *Mulligan v Virgin Australia Pty Ltd [2015] FCAFC 130*²⁸. The case of Mulligan v Virgin Australia Airlines was a ruling made by the Full Court of the Federal Court, overturning a previous decision by the Federal Circuit Court. Based on this ruling access for assistance animals would seem settled and ready for inclusion in DSAPT.

Currently DSAPT-2002 Section 28.3 *Location of carers, assistants and service animals* only defines rights on aircraft and other conveyances but not in premises or infrastructure.

28.3 Location of carers, assistants and service animals

- (1) On booked services, operators must locate carers, assistants or service animals with the passenger with whom they are travelling.
- (2) In the case of carers or assistants, this would normally be in an adjoining seat.
- (3) If a passenger is travelling with a service animal, the animal must be able to accompany the passenger at all times and to travel without encroaching onto an access path.

Conveyances

- Aircraft
- Coaches
- Ferries
- Dial-a-ride services

The DSAPT Guidelines offer a degree of definition and currently read:

1.24 Carers, assistants and service animals

Some passengers may need to be accompanied by a carer, assistant or service animal. A service animal is an animal trained by a recognised individual or agency and is not subject to a fare. A carer or assistant should be prepared to pay a fare.

The workshops run by the Royal Commission heard that discrimination against people with assistance animals occurred²⁹:

Some of the key insights arising from the workshops included:

- Experiences of discrimination against people with disability who use assistance dogs. Participants discussed the refusal of being allowed to travel on flights while accompanied by assistance dogs.

²⁸ [Mulligan v Virgin Australia Airlines Pty Ltd \[2015\] FCCA 157 \(27 January 2015\) \(austlii.edu.au\)](https://www.austlii.edu.au/au/other/dfat/special/mulligan.html)

²⁹ [Workshops find people with disability an afterthought in domestic air travel | Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability](#)

Instances of passengers being separated from their assistance animals while passing through security screening have been reported in the media^{30, 31, 32}. This experience can be traumatising for both animal and handler.

Adequate toileting for assistance and service animals also needs to be considered. While many airports now have toileting for assistance and service animals, the following is often not considered:

- consistent placement of these facilities in easy to access areas in airports,
- consistent placement of accessible signage to direct to these facilities (see wayfinding section),
- accessible airline websites that are screen-reader friendly, so people know whether an airport has allocated toilets for assistance/service animals.

VisAbility and Guide Dogs WA worked with Perth Airport to identify these issues as well as ways to improve the signals to assistance and service animal toileting facilities and the design of the facilities themselves³³.

Carers

As per assistance animals DSAPT does not accommodate carers in premises or infrastructure. The DDA spells out rights of access for people accompanied by carers in *Section 8 Discrimination in relation to carers, assistants, assistance animals and disability aids* and defines carers in *Section 9 Carer, assistant, assistance animal and disability aid definitions*.

As a Disability Standard the DSAPT should be clear that:

- Carers should have full right of access to all public places when accompanying people with disability.
- Carers cannot be refused access to a booked or unbooked conveyance.
- Carers and the people with disability that they accompany should not be separated.
- Evidence of carer status can be requested by the operator or provider.

Even when staff are providing assistance carers should be present. They have knowledge and information that can assist the staff member to provide optimal assistance rather than making assumptions. A recent incident where a prominent disability advocate was separated from his carers by a staff member—who then caused the advocate to fall from an aisle chair³⁴—highlights the need for carers to always remain with the people with a disability who they are accompanying.

Currently DSAPT-2002 Section 28.3 *Location of carers, assistants and service animals* only defines rights on aircraft and other conveyances but not in premises or infrastructure.

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³⁰ [Graeme Innes fights to change how disabled people are treated when they fly \(smh.com.au\)](http://smh.com.au)

³¹ [Former disability discrimination commissioner Graeme Innes calls for change after 'humiliating' Adelaide Airport experience - ABC News](#)

³² [Airports and airlines on notice after people with disability speak out about humiliating treatment - ABC News](#)

³³ <https://www.visability.com.au/our-teams-vision/access-consultancy-perth-airport/>

³⁴ [Virgin Australia investigating after former Queensland Australian of the Year tipped out of wheelchair at Brisbane Airport - ABC News](#)

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What improvements can be made to aviation accessibility that are outside the scope of the Disability Standards for Accessible Public Transport?

Transfer to aisle chair at boarding point on request

QDN recommends giving people with disability the opportunity to maintain independence and mobility for as long as possible before boarding. Therefore, if a passenger requests it, transferring to aisle chairs should occur at the boarding point. This requirement could be incorporated in a Customer Rights Charter.

Assisted access from arrival point to aircraft

Large and even medium sized airports are complex, challenging places for people who have vision, cognitive, intellectual and neurodiverse impairments. Travelling from the airport arrival point to the aircraft seat can be a daunting experience and a significant disincentive to independent air travel. The same applies in reverse on arrival at destination.

QDN recommends implementing a Memoranda of Understanding (MoU) between airlines and airport managers providing allowances for assistance in transit between arrival point and aircraft to be identified at booking and implemented via a concierge service. The MoU could specify responsibilities and expectations at each individual airport. This requirement for MoU could be incorporated in a Customer Rights Charter.

Sensory rooms and spaces

Studies have highlighted the efficacy of waiting areas that incorporate sensory rooms or spaces for people who are neurodiverse³⁵. Airports are installing such rooms globally and the trend should extend to Australian airports. QDN recommends provision of sensory rooms or spaces form part of any Disability Access Facilitation Plan.

³⁵ [IJERPH | Free Full-Text | Autism Spectrum Disorder \(ASD\) and the Family Inclusive Airport Design Experience \(mdpi.com\)](https://www.mdpi.com/ijerph/14/12/2181)

Complaints

Airlines should have a complaints process that treats people with disability respectfully and fairly. QDN recommends co-designing complaints processes with all stakeholders. This requirement could be incorporated in a Customer Rights Charter.

Lithium-ion batteries

The Royal Commission heard a call for standardisation of processes for carrying lithium-ion wheelchair batteries on aircraft.

Current regulations only cover batteries with over 300 watt-hours³⁶.

CASA 66/22 — Dangerous Goods (Mobility Aid Lithium Ion Battery) Instrument 2022

3 Definitions

battery means a lithium-ion battery with a watt-hour rating of more than 300 watt-hours.

Note The type of battery mentioned in this definition is specified in the Dangerous Goods List contained in the Technical Instructions.

CASA often defaults to airline policy rather than providing clarity or an opportunity for consistency across airlines³⁷.

Lithium ion batteries 100–160WH

These are more powerful batteries. You can find them in equipment such as power tools and mobility aids. They're usually between 100 and 160Wh.

If you want to carry these kind of lithium batteries with you, you must get approval from your airline before flying.

If the battery is in a device, you may carry it in either checked or carry-on baggage. If the battery is a spare and not in the equipment, you must carry it in your carry-on baggage only.

Lithium ion batteries 160Wh and over

You can't carry lithium batteries rated at 160Wh or more unless they're for wheelchairs and other mobility aids. Read more about wheelchairs and mobility aids with non-spillable batteries on flights.

For all other lithium batteries rated at 160Wh or more, you must transport these batteries as dangerous goods cargo.

Contact your airline for more advice.

Each airline has its own lithium-ion battery policy, which can cause confusion and disappointment. Standardisation of processes for carrying lithium-ion wheelchair batteries on aircraft should be incorporated in a Customer Rights Charter.

³⁶ [CASA 66/22 — Dangerous Goods \(Mobility Aid Lithium Ion Battery\) Instrument 2022 \(legislation.gov.au\)](#)

³⁷ [Batteries and portable power packs | Civil Aviation Safety Authority \(casa.gov.au\)](#)

What are the specific challenges faced by people with disability wishing to travel by air in regional and remote areas?

Airport accessibility

Not all regional and remote airports are accessible. This is frequently due to outdated, inaccessible infrastructure and financial challenges faced by the asset owner. DSAPT-2002's *Schedule 1 Target dates for compliance* (Section 33.2) could not be met if funds for upgrades were unavailable.

The precise number of accessible regional and remote airports remains uncertain. QDN recommends having a nationwide database that clearly outlines the accessibility status of all airports accommodating passenger services. This would be invaluable and should be a priority in the DSAPT reform process.

Airport financial viability

The economic viability of regional and remote airports is tenuous. This will impact the capacity of the asset owner to upgrade facilities for accessibility. Regional Capitals Australia highlighted the scale of the problem and the financial challenges when seeking Commonwealth investment in a September 2023 article:

“An estimated 200 regional airports are owned and operated by local councils but rising operating, regulation and security costs means that many airports are operating at a loss and a burden on regional ratepayers.”³⁸

Regional Capitals Australia's *Regional Airports Policy Paper*³⁹ makes salient points on the challenges faced in the regions and the role that regional airports play nationally:

1. It is estimated that more than 200 regional airports and aerodromes are owned and operated by local governments across Australia;
2. Forty per cent of Australia's 61 million annual domestic aviation passengers travel through regional airports;
3. Civil Aviation Safety Authority (CASA)'s regulatory imposts are higher for regional and remote airports, comprising 12 per cent of total expenditure, compared to about 4 per cent for major airports and major regional airports;
4. Sixty per cent of regional airports operate at a loss. They depend upon cross-subsidisation by their local government owners who are already burdened by competing demands on their limited financial resources; and
5. Almost 40 per cent of regional airports expect persistent budget deficits over the next 10 years.

An ABC article⁴⁰ reiterates the number of regional airports running at a loss:

³⁸ [INVESTMENT IN AIRPORTS NEEDED FOR REGIONS TO FLY - Regional Capitals Australia](#)

³⁹ [RCA-Regional-Airports-Policy.pdf \(regionalcapitalsaustralia.org\)](#)

⁴⁰ [Local governments push for more regional airport funding as ratepayers subsidise dozens of council-owned facilities - ABC News](#)

A new report by an advocacy group for regional local governments found there are 200 regional airports owned and operated by councils nationally.

An estimated 60 per cent — or 120 airports — operate at a loss, Regional Capitals Australia (RCA) found, and many are dealing with ageing and insufficient infrastructure.

Regional Capitals Australia's *Regional Airports Policy Paper*⁴¹ makes various recommendations that are viewed as necessary to ensure future viability:

1. Implement a policy recognising the importance of regional airports in increasing the connectivity of regional Australia and to consider future planning and funding of regional airports;
2. Provide recurrent funding for the Regional Airport Fund to ensure that regional airports can be upgraded and maintained, and to guarantee the sustainability of the regional aviation network;
3. Upgrade the guidelines for the Regional Airport Fund to allow for landside developments to be considered; and
4. Review the efficacy of Western Australia's Strategic Airport Asset and Financial Management Framework (as recommended by the Productivity Commission) to assess the efficacy of the Framework and determine its suitability for application across all jurisdictions. Subject to the results of the review, support the roll-out of the Framework across other Australian jurisdictions.

These recommendations seem reasonable if local authorities are to be in a financial position to implement accessibility upgrades at their airports. Commonwealth and State recurrent funding would seem imperative for the ongoing operation and the DSAPT / Premises Standards upgrades at most regional and remote airports.

Engineers Australia have identified the need for program commitment and funding commitment to meet DSAPT retrofit requirements in *Engineers Australia 2022 Universal Design for Transport: Transport Australia Society Discussion Paper* and have included this in their Chapter 8 Recommendations⁴²:

8. Recommendations

4. Need for long term program and state commitment to retrofitting existing infrastructure to achieve DSAPT standards – including a funding commitment.

Infrastructure Australia comments on lack of funding commitment to public transport upgrades in its *Australian Infrastructure Audit 2019*⁴³.

70. Challenge

⁴¹ [RCA-Regional-Airports-Policy.pdf \(regionalcapitalsaustralia.org\)](https://www.regionalcapitalsaustralia.org/RCA-Regional-Airports-Policy.pdf)

⁴² [Universal design for transport: discussion paper \(engineersaustralia.org.au\)](https://www.engineersaustralia.org.au/universal-design-for-transport-discussion-paper)

⁴³ [Australian Infrastructure Audit 2019.pdf \(infrastructureaustralia.gov.au\)](https://www.infrastructureaustralia.gov.au/Australian-Infrastructure-Audit-2019.pdf)

There is insufficient funding to make our public transport networks accessible to people with disability. Unless funding shortfalls are addressed, legislated accessibility targets for public transport will not be reached and our networks will not be inclusive.

A lack of funding is perhaps the greatest challenge in meeting legislated standards. The latest review of the Standards identified that the infrastructure upgrades required between 2017 and 2022 are likely to cost the most, and achieve the lowest relative benefit to accessibility, making them unattractive investments to governments.

The financial pressure has been highlighted by local governments, which are often responsible for bus stops. Local Government NSW notes that the introduction of the Standards was not accompanied by additional funding for implementation, making it difficult to meet requirements.

If access is to be achieved at all regional and remote airports it is beyond the means of local authorities to achieve this without substantial investment and recurrent funding assistance.

Boarding and alighting

Metropolitan airports usually board and alight via airbridges. However, in regional and remote airports tarmac boarding and alighting is the norm. For people who are unable to ascend or descend aircraft access stairs this presents a challenge that only vertical transport can address. Not all airlines provide a Disabled Passenger Lifter (DPL) at regional or remote airports. For example, according to the Rex Airlines website⁴⁴:

WHEELCHAIR DEPENDENT PASSENGERS

Please note that some airports in Queensland cannot cater for passengers who require the use of the Disabled Passenger Lifter (DPL). Mobility disabled passengers who are not capable of ascending the aircraft stairs are asked to call the Customer Contact Centre prior to booking to check. DPLs are currently not installed at Bedourie, Boulia and Burketown.

Mobility aid dimension limits

As mentioned on pp. 3-4 of this submission, the DSAPT Guidelines Part 40 provides dimensions for mobility aids that people with disability refer to when selecting mobility aids. In summary, the allocated space for stationary mobility aids is 800mm wide by 1300mm long.

All passenger aircraft used by major airlines accommodate the 800 mm limit on mobility aid width (See Table 2).

All turboprop aircraft and most narrow-bodied jets failed to accommodate mobility aids of up to 1300 mm length. The outlier was Jetstar's A320 and A321 aircraft which can accommodate a mobility aid of up to 1400 mm. The reason why the A320s of other carriers cannot match Jetstar A320 length limits remains unclear.

⁴⁴ [Special Requirements \(rex.com.au\)](https://www.rex.com.au)

The turboprop and narrow-bodied jets in Table 2 are the aircraft that fly to regional and remote airports. These airports have shorter runways and lower passenger demand and cannot therefore accommodate wide-bodied jets.

As a result, some people with larger mobility aids that otherwise meet the DSAPT assumptions would not be able to travel to or from regional and remote airports.

Table 2. Mobility aid dimensions by airline—turboprop aircraft and narrow-bodied jets.

Airline and aircraft	Width (mm)	Height (mm)	Length (mm)
Rex⁴⁵			
Saab 340	850	1300	1150
Boeing 737	1000	840	1250
Jetstar⁴⁶			
Airbus A320	1400	1000	1400
Airbus A321	1400	1000	1400
Qantas⁴⁷			
Boeing 737	1000	840	1250
Bombardier Dash 8	850	1300	1150
Boeing 717	1290	690	1000
Network Aviation⁴⁸			
Fokker 100	1250	630	1250
Alliance*⁴⁹			
Fokker 100	1000	650	1250
Embraer 190	1000	840	1250
Virgin Australia⁵⁰			
Boeing 737	1000	840	1250
Airbus A320	1000	840	1250
Fokker 70	1000	650	1250
Fokker 100	1000	650	1250
Saab 340	850	1300	1150

Mobility aid weight limits

Refer to pp. 4-6 for a breakdown of mobility aid weight limits and aircraft and the barriers imposed for travellers with disability. In summary, the total weight to be supported by a boarding device needs to be not more than 300kg.

The weight limit puts severe restrictions on many people whose mobility aid exceeds 120 kg. QDN understands this is a requirement if an aircraft is full however if safe cargo weight limits have not been

⁴⁵ [Special Requirements \(rex.com.au\)](http://rex.com.au)

⁴⁶ [Limits on assistance and mobility aids | Jetstar](#)

⁴⁷ [Mobility assistance, wheelchair access, crutches | Qantas](#)

⁴⁸ [Mobility assistance, wheelchair access, crutches | Qantas](#)

⁴⁹ [Mobility assistance, wheelchair access, crutches | Qantas](#)

⁵⁰ [Mobility assistance | Virgin Australia](#)

reached it would seem reasonable to accommodate mobility aids that exceed 120 kg provided safe cargo limits were not breached.

Involving all stakeholders in a co-design process could lead to establishing practical weight limits for mobility aids that align to safe carrying capacity of the aircraft, rather than imposing inflexible upper weight restrictions.

How can Disability Access Facilitation Plans by airlines and airports be improved?

There are almost as many Disability Access Facilitation Plans (DAFP) as there are airports and airlines. Quality and content vary. Co-designing a template that industry could use to develop DAFPs would allow greater consistency between plans and give greater certainty to passengers who have a disability.

QDN recommends the requirement for a co-designed template be incorporated in a Customer Rights Charter.

How should the AAF be restructured to be more effective and better able to drive and enforce change to address issues faced by travellers living with disability?

The Aviation Access Forum (AAF) appears to have a purely advisory function⁵¹.

The Aviation Access Forum (AAF) was established in 2013 to provide advice to the Australian Government on disability access policy as well as operational and administrative issues associated with access to air services for people with disability.

The AAF also provides an opportunity for information to be exchanged between representatives of disability sector organisations, the aviation industry and Australian Government agencies as a means of further improving disability access in aviation.

Advice can be disregarded, and when the modest reforms of the aviation industry and the persistent complaints from people with disability are considered, it's evident that such advice may have been frequently disregarded.

The AAF may have greater impact for people with disability if it were restructured to be an advocacy body speaking for people with disability, without industry representation. Alternatively, it could be continued as a communication forum between the disability sector, government and industry with a separate disability advocacy body articulating the views and issues of the disability sector to government.

Most States and Territories have advisory / advocacy groups that represent the views of the disability sector to government, and which can be consulted on proposed policy changes. These groups usually do not include industry representatives.

For enforcement to occur the AAF would need reporting access to bodies that could investigate and prosecute complaints. Currently people resort to the media to highlight their issues. This is far from satisfactory.

⁵¹ [Aviation Access Forum \(AAF\) | Department of Infrastructure, Transport, Regional Development, Communications and the Arts](#)

Media attention is the current mechanism to seek recourse and promote the conversation for inclusivity for people with disability who air travel⁵².

Activities of a reformed AAF might include:

- Participation in co-design processes
- Referral of complaints to investigative bodies
- Authoring issues papers highlighting needed reforms
- Informing the disability sector of procedural changes, projects and policy initiatives
- Maintaining dialogue with the disability sector, government and industry.

Membership should be expanded to include representatives of organisations representing people with disability that are place-based jurisdictionally in states and territories.

Option for an aviation-specific Transport Standard that explicitly states the human rights obligations of the sector

The Premises Standards and the DSAPT have quite specific requirements for airports and the DSAPT has specific requirements for aircraft. There are many gaps in the requirements of that could be effectively covered by an aviation specific Transport Standard. Alternatively, aviation specific Parts and Sections could be incorporated into the DSAPT and Premises Standards.

An aviation-specific Transport Standard would only be effective if certification of compliance was a requirement for initial operation. Continued operation would be contingent on ongoing compliance with the aviation specific Transport Standard. This would require certification by professional bodies and on periodic public review as per DSAPT.

One of the strengths of the Premises Standards is that any new work or significant refurbishment of existing work must be certified as compliant by a licenced building surveyor or certifier. The DSAPT has no such mechanism to ensure compliance. Rather, industry self regulates and failure to comply is only enforceable through public complaint.

If an aviation-specific Transport Standard follows the DSAPT model—depending on the public to lodge complaints regarding non-compliance—it will fail.

Customer Rights Charter

A Customer Rights Charter should be based on human rights. The CRPD and DDA offer a starting point for the rights that must be listed and respected in any Customer Rights Charter. There are multiple points along any journey by air at which the rights of people with disability can be compromised or ignored. This journey commences at planning and booking, proceeds to airport and boarding, continues in flight, transits, the destination airport and ends with the capacity to report problems or damage to equipment post journey.

The Customer Rights Charter is a sound proposal that should be co-designed by all stakeholders.

⁵² [Air travel workshops | Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability](#)

An *Airline Passengers with Disabilities Bill of Rights*⁵³ is issued by the United States Department of Transportation.

Airline Passengers with Disabilities Bill of Rights

This Bill of Rights describes the fundamental rights of air travelers with disabilities under the Air Carrier Access Act and its implementing regulation, 14 Code of Federal Regulations (CFR) Part 382.

The Bill might serve as a template for a Customer Rights Charter.

Airline Consumer Advocate

The Airline Consumer Advocate (ACA) is funded by participating partners from industry and cannot issue binding directives. Even with the best of intentions its ability to deliver satisfaction to aggrieved customers is severely limited. The office should be terminated.

QDN recommends establishing an Airline Ombudsman's office with investigative powers and which could issue binding directives to airlines and airports over Customer Rights Charter breaches.

Compliance failures at airports

DSAPT-2002's *Schedule 1 Target dates for compliance* (Section 33.2) was not met at many if not most airports and not met by any airlines. There will be few if any repercussions for this failure. The only instrument available to challenge this situation is the DDA.

For regional and remote airports, the chief reason was lack of funds for upgrades. No such excuse exists for the airlines.

Since the DDA is complaints driven and enforceable decisions can only be made in the Federal Court complaining is a daunting prospect for people with a disability. The power imbalance of challenging a well-resourced legal team is a significant disincentive to complain. Most people raise their issues with the media, which highlights the issue but initiates no change.

Waiting areas

An example of an easily implemented requirement that has been routinely ignored is in waiting areas. The DSAPT-2002 Section 7.1 requires that waiting areas have seats that are 'identified as available for passengers with disabilities if required' and allocated spaces for wheelchairs.

Part 7 Waiting areas

7.1 Minimum number of seats to be provided

If a waiting area is provided, a minimum of 2 seats or 5% of the seats must be identified as available for passengers with disabilities if required.

Premises

Infrastructure, except airports that do not accept regular public transport services

7.2 Minimum number of allocated spaces to be provided

If a waiting area is provided, a minimum of 2 allocated spaces or 5% of the area must be available for passengers with disabilities if required.

⁵³ [Airline Passengers with Disabilities Bill of Rights | US Department of Transportation](#)

Premises

Infrastructure, except airports that do not accept regular public transport services

QDN members have identified several regional and remote airport passenger lounges that do not have designated priority seating or allocated wheelchair spaces.

Media reports of discrimination or poor practice

Air travel continues to present major hurdles and challenges to passengers who have a disability. Headlines from some recent media reports capture a few of the many challenges rather well. These media reports are only the tip of an iceberg of poor and discriminatory practice.

'Second-class citizen': man lifted on to plane as Darwin airport had no ramp for wheelchair users⁵⁴

'This was indignity': passenger with disability left without wheelchair at Sydney Airport⁵⁵

Airports and airlines on notice after people with disability speak out about humiliating treatment⁵⁶

Former disability discrimination commissioner Graeme Innes calls for change after 'humiliating' Adelaide Airport experience⁵⁷

Budget airlines make it hard for people with disabilities to travel, but Australian tourist sights get top marks⁵⁸

Disability discrimination case highlights challenges faced by airline customers travelling with electric wheelchairs⁵⁹

Passenger kept from boarding after Jetstar's refusal to assist with wheelchair makes discrimination complaint⁶⁰

Graeme Innes fights to change how disabled people are treated when they fly⁶¹

Adelaide Airport passenger using mobility scooter says she was treated without 'empathy or compassion'⁶²

Qantas leaves angry Melbourne wheelchair user stranded at airport gate⁶³

Furious Paralympian calls out Qantas boss Alan Joyce after she's told to LEAVE her wheelchair if she wants to travel: 'You can't make this stuff up'⁶⁴

⁵⁴ ['Second-class citizen': man lifted on to plane as Darwin airport had no ramp for wheelchair users | Disability | The Guardian](#)

⁵⁵ ['This was indignity': passenger with disability left without wheelchair at Sydney airport | Disability | The Guardian](#)

⁵⁶ [Airports and airlines on notice after people with disability speak out about humiliating treatment - ABC News](#)

⁵⁷ [Former disability discrimination commissioner Graeme Innes calls for change after 'humiliating' Adelaide Airport experience - ABC News](#)

⁵⁸ [Budget airlines make it hard for people with disabilities to travel, but Australian tourist sights get top marks - ABC News](#)

⁵⁹ [Disability discrimination case highlights challenges faced by airline customers travelling with electric wheelchairs | Public Interest Advocacy Centre \(piac.asn.au\)](#)

⁶⁰ [Passenger kept from boarding after Jetstar's refusal to assist with wheelchair makes discrimination complaint | Human rights | The Guardian](#)

⁶¹ [Graeme Innes fights to change how disabled people are treated when they fly \(smh.com.au\)](#)

⁶² [Adelaide Airport passenger using mobility scooter says she was treated without 'empathy or compassion' - ABC News](#)

⁶³ [Qantas leaves angry Melbourne wheelchair user stranded at airport gate | 7NEWS](#)

⁶⁴ [Paralympian slams Qantas boss Alan Joyce after not being allowed on flight with wheelchair | Daily Mail Online](#)

Virgin Australia investigating after former Queensland Australian of the Year tipped out of wheelchair at Brisbane Airport⁶⁵

Teacher seeks reimbursement from Virgin Australia over broken wheelchair, ongoing costs⁶⁶

Conclusion

QDN is pleased to present our response to the Aviation Green Paper – Towards 2050 to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts. Our submission is a culmination of QDN members’ technical expertise and lived experience of air travel.

QDN commends the Australian Government for this reform process and supports the call for the aviation industry to direct additional and ongoing investments toward making services accessible and legally compliant with human rights obligations. QDN looks forward to further opportunities to contribute to the Australian Government’s commitment to accessible travel, including the outcomes and Aviation White Paper.

⁶⁵ [Paralympian slams Qantas boss Alan Joyce after not being allowed on flight with wheelchair | Daily Mail Online](#)

⁶⁶ [Teacher seeks reimbursement from Virgin Australia over broken wheelchair, ongoing costs - ABC News](#)