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Department of Infrastructure and Regional Development
Aviation Access Forum Secretariat

By email to AAF_Secretariat@infrastructure.gov.au

Submission: Airline Two Wheelchair Policy Paper

Introduction

Multiple Sclerosis Australia (MSA) welcomes the opportunity to make a submission to the Aviation Access Forum regarding the Airline Two Wheelchair Policy Paper.

MS Australia is the national peak body for people affected by multiple sclerosis (MS). This includes carers, loved ones, fundraisers, the MS research community and of course people with MS. Our vision is for a world without multiple sclerosis.

As the national peak body we provide leadership in: advocacy, communications, branding and building collaborative relationships. We aim to benefit Australians living with MS, improve treatments and work directly with MS Research Australia to accelerate research to ultimately find a cure for MS.

Discussion

MSA, like many other organisations that advocate on behalf of people with a disability would like to see the “two wheelchair” policies and their practice, adopted by some Australian airlines, ceased.

We acknowledge that the aviation industry, especially low-cost operators, have submitted a number of financial, operational and safety reasons for adopting these policies and we recognise that comparisons with overseas jurisdictions (especially the USA where such restrictions are not permitted under the Air Carrier Access Act) may not be valid on the basis of volume and various other infrastructure constraints at Australian airports.

We commend the work of the Department of Infrastructure and Regional Development in preparing this paper for public comment, the summary of issues and the proposed way forward.

MSA generally supports the three suggestions for improving current arrangements and we have made comments under each.



(a) Adopt a more flexible approach to the implementation of the policy.

MSA concurs with the comments in the policy paper under this suggestion and we would like to see increased flexibility adopted over time, to the point where Airline Two Wheelchair policies become redundant.

(b) Improve the booking process

MSA concurs with the comments in the policy paper under this suggestion. A quick review of three of the relevant airline websites reveals considerable variability in information for disabled travellers. One example is the Jetstar website that includes a wide variety of items under the Baggage - Bulky items menu, but does not include arrangements for wheelchairs. These arrangements are set out separately under the menu headings "Planning and booking", then "At the airport", then "Specific assistance" then "Mobility assistance and torso restraints". This is just one example, but is indicative of the difficulties faced in obtaining relevant information.

(c) Amend the guidance material on the carriage of mobility aids.

MSA concurs with the comments in the policy paper under this suggestion. It would also be helpful if airlines could guarantee a consistency of information to ensure that their written material and the information that is received when making phone and email enquiries is consistent with the expectation of services provided at the airport. Complaints received by MSA regarding air travel from people with MS are often characterised by inconsistencies in the information provided by the airline in writing, over the phone and in person at the airport.

Suggestions

A relatively small percentage of the approximately 23,000 people currently diagnosed with MS in Australia are confined to using wheelchairs when travelling by air. Our data indicates that around 15 years from diagnosis, approximately 50% of people with MS need some form of mobility aid. Therefore, it is very important that people living with MS are given the reassurance that, should they need to travel by air at some time in the future when their MS has progressed to the stage of needing to use a wheelchair (or some other mobility aid) that each airline's policies, procedures and information are helpful and consistent.

Our concern is that once the final policy is settled, that the mechanisms for implementation and compliance are widely published and available.

MSA suggests that the final version of the policy include a section regarding implementation and a system for ensuring routine compliance. It would also be helpful if a mechanism for dealing with complaints about the policy from travellers could be set out.

Multiple Sclerosis Australia is pleased to have been given the opportunity to comment on the Airline Two Wheelchair Policy Paper. We look forward to receiving a copy of the final policy paper and seeing continuing improvements for people with multiple sclerosis travelling by air.

Yours sincerely,



Chief Executive Officer
Multiple Sclerosis Australia