



Aviation Disability Standards

OCTOBER 2026



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ADVOCACY
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What is MS?

Multiple Sclerosis (MS) remains one of the most common causes of neurological disability in the young adult population (aged 18–40 years) with over 2.9 million people affected worldwide. More than 37,756 Australians live with MS and over 7.6 million Australians know someone or have a loved one with this potentially debilitating disease.

Three times as many women have MS than men. Symptoms vary between people and can come and go; they can include severe pain, walking difficulties, debilitating fatigue, partial blindness and thinking and memory problems. For some, MS is characterised by periods of relapse and remission, while for others it has a progressive pattern of disability. MS robs people of quality of life, primarily driven by the impact of MS on pain, independent living, mental health and relationships.

MS Australia is Australia's national multiple sclerosis (MS) not-for-profit organisation that empowers researchers to identify ways to treat, prevent and cure MS, seeks sustained and systemic policy change via advocacy, and acts as the national champion for Australia's community of people affected by MS.

MS Australia represents and collaborates with its state and territory MS Member Organisations, people with MS, their carers, families and friends and various national and international bodies to:

- Fund, coordinate, educate and advocate for MS research as part of the worldwide effort to solve MS
- Provide the latest evidence-based information and resources
- Help meet the needs of people affected by MS

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Aviation Disability Standards

Executive Summary

MS Australia welcomes the opportunity to make a submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (Department) and respond to the Aviation Disability Standards consultation paper. MS Australia values this consultation and hopes that our recommendations assist the Department to ensure the reformed Aviation Disability Standards enable airport and aviation services to be fully accessible to meet the needs of people living with disability, including people living with MS and their carers.

Over five and a half million Australians currently live with a disability¹ and they represent over 20 per cent of the Australian community. For people with MS, particularly those in regional, rural and remote communities, air travel may be essential for medical care, work, family, community participation and holidays. Inconsistent information, inaccessible booking systems and facilities, fragmented assistance, unsafe transfers, damage to mobility aids and inaccessible aircraft features can undermine independence and, in some cases, prevent travel altogether.

Airports and airlines must have clearly defined and shared responsibilities, provide coordinated and proactive assistance, train staff in disability inclusion, involve people with disability in design and oversight, and report publicly on compliance and passenger outcomes. These obligations should apply across metropolitan, regional and remote aviation services, with balanced implementation where appropriate but no gaps in access or accountability.

Because MS symptoms can fluctuate and may not be visible, aviation services must focus on each passenger's functional needs rather than diagnosis or appearance. Passengers need accessible information before booking and during disruptions; fair fares and seating; timely decisions about assistance animals and disability aids; safe airport navigation and transfers; protection and tracking of mobility aids; and accessible boarding, toilets, information, services, entertainment and controls onboard aircraft.

Lived Experience

This submission draws on the experiences and expertise of MS Australia's [Lived Experience Expert Panel](#) (LEEP). The LEEP is a panel of people who either live with MS or are a carer for someone living with MS, and who provide MS Australia with expert advice to inform our advocacy work. Their feedback reflects the lived experience and responses of people living with MS to the recommendations of reforming the Aviation Disability Standards. The feedback from the LEEP members covers the diverse range of experiences of ability and disability for people living with MS. LEEP members also provided input in our previous submission on the Department's [Draft Updated Whole Journey Guide](#), [Exposure Draft: Reform of the Disability Standards for Accessible Public Transport 2002 \(Transport Standards\)](#) and [Aviation Green Paper](#).

MS Australia's recommendations prioritise nationally consistent standards, passenger choice and dignity, accessible communication, timely assistance, safe handling of disability aids, clear implementation deadlines and transparent reporting. The key recommendations are summarised below.

MS Australia Recommendations

Whole of Journey

- Establish nationally consistent requirements across airports and airlines to provide passengers with disability a seamless, reliable and accessible experience throughout every stage of air travel.

- **Shared roles and responsibilities:** Require airports and airlines to share responsibility for passenger assistance, with clearly defined roles, coordinated processes and seamless handovers so there are no gaps in support.
- **Disability training for staff:** Require regular accessibility and inclusion training for all relevant airport and airline staff. Training should be co-designed with people with disability and carers, included in onboarding and ongoing professional development, and cover invisible disabilities and the Hidden Disabilities Sunflower lanyard.
- **Disability reference groups:** Require every airport and airline to establish and maintain a disability reference group, regardless of passenger volume or location. Groups should include people with diverse disabilities and carers, including people with MS and other neurological conditions, and have clear terms of reference that ensure lived experience meaningfully influences policies, facilities, procedures and training.
- **Annual reporting and accountability:** Require every airport and airline to report annually on compliance with the Aviation Disability Standards, regardless of size or location. Reporting should cover damaged or lost disability aids, staff training, refusals of travel, refusals of assistance animals, and complaints involving injury or disability discrimination. Results should be published in a consistent and accessible format.

Planning and Booking Air Travel

- Require processes that respond to individual support needs, protect personal information, and arrange assistance, equipment, seating and communication without discrimination or additional cost.
 - **Optional passenger assistance profiles:** Require profiles to be brief, reusable and focused on functional support needs. Passengers should control what information is included, who can access it and when it is updated or removed, with strong privacy and data-security safeguards.
 - **No arbitrary limits on passengers requiring assistance:** Prohibit blanket or fixed caps. Any restriction should be based on an individual assessment of a genuine, evidence-based safety risk, with clear written reasons, reasonable alternatives and no additional costs.
 - **Advance notice of accessibility needs:** Allow airports and airlines to request up to 48 hours' notice for assistance that requires planning, while requiring reasonable efforts to assist passengers whose needs arise at short notice. Information must be reliably shared across the whole journey.
 - **Equal fares across booking methods:** Ensure passengers with disability can access the same fares, sale prices, inclusions and booking options online or by phone, without additional telephone booking or service fees.
 - **Consistent rules for assistance animals:** Standardise evidence requirements and require airlines to decide applications within 48 hours where sufficient notice is given. A failure to decide should be treated as a refusal, with a full refund or free rebooking available.
 - **Clear approval process for battery-powered mobility aids:** Establish one nationally consistent framework covering evidence, certification and battery requirements. Approvals should be linked to bookings, reusable for repeat travel and recognised during transfers.
 - **Free and safe transport of disability aids:** Require all disability aids to be carried free of charge, including multiple mobility aids. Essential aids, medication equipment and approved batteries should remain in the cabin where safe and practicable, with consistent screening, storage and documentation requirements.
 - **Fair requirements for carers or companions:** Only require a support person where there is a genuine safety need or a requirement for continuous medical, personal care or communication support. Where an airline imposes this requirement, it should cover or substantially subsidise the companion's fare and provide adjacent seating without

additional cost.

- **Use of medical certificates:** Limit requests to specific, evidence-based safety risks. Certificates should not be routinely required for accessibility assistance, mobility aids, or invisible and fluctuating symptoms, and passengers should not have to disclose unnecessary medical information.
- **Accessibility information before booking:** Require airports and airlines to publish accurate, current and accessible information about facilities, equipment, assistance, restrictions and requirements in a consistent format so passengers can compare services and make informed decisions.
- **Accessible booking information and support:** Provide booking information in formats such as Auslan, Easy Read, Braille, pictorials and social stories. Airlines should also offer a simplified booking mode, additional time to complete online bookings, and accessible phone and interpreter support at no extra cost.
- **Accessible communication during disruptions:** Contact passengers who have requested disability support promptly through their preferred channels, provide personalised assistance, preserve all agreed accessibility arrangements when rebooking, and provide suitable rest areas, refreshments and accessible accommodation during significant delays.
- **Clear communication when travel is refused:** Where sufficient notice was provided, require airlines to explain refusals involving a passenger or disability aid immediately and provide written reasons within 10 days. Airlines should offer a suitable alternative flight at no higher fare or a full refund, along with review and complaints information.
- **Accessible seat choice without additional cost:** Allow passengers to choose seats needed for accessibility, including aisle seats, seats near toilets, seats with movable armrests or additional space. Required carers or support people should be seated adjacent without extra charge, and any verification process should be simple and based on functional need.

At the Airport

- Require nationally consistent support, accessible facilities and clear information so passengers with disability can navigate airports safely, independently and with dignity.
 - **Mobility devices:** Allow passengers to remain in their own mobility device until the latest safe and practicable point, with any transfer timing agreed with the passenger and continuous assistance provided afterward.
 - **Accessible check-in:** Require all self-service check-in and bag-drop facilities to have accessible physical and digital design, be co-designed with people with disability, and have staff assistance available.
 - **Assistance points:** Require every airport, including smaller and regional airports, to provide clearly signposted, accessible points where passengers can promptly request information and assistance.
 - **Wayfinding:** Implement nationally consistent signage and wayfinding requirements, tested with people with disability and supported by accessible visual, audio and digital information.
 - **Travel disruptions:** Require airports and airlines to proactively provide accessible updates, direct assistance and suitable alternative travel that preserves agreed accessibility supports.
 - **Airport access:** Provide accessible parking, drop-off and pick-up areas, and public transport, taxi and rideshare connections close to terminal entrances, with assistance available inside and outside terminals.
 - **Security screening:** Require consistent and dignified screening processes, optional priority access, accessible information, informed consent and disability-specific staff training with competency assessments.

- **Accessible facilities:** Set minimum national requirements and implementation timeframes for accessible toilets, changing facilities, quiet and sensory rooms, seating, lifts, transfer spaces, assistance-animal relief areas and staffed priority assistance points.
- **Disability aids:** Treat disability aids as essential equipment, keep them close to passengers wherever possible, use trained staff and prescribed handling procedures, and provide real-time tracking at every handover.
- **Passenger transfers:** Ensure transfers are safe, dignified, unhurried and directed by the passenger, with preferences recorded in advance and trained staff and suitable equipment readily available.

On the Aircraft

- Require nationally consistent accessible boarding, onboard facilities, information and support so passengers with disability can travel safely, comfortably and with dignity.
 - **Boarding and disembarkation:** Require safe, step-free access at every airport through aerobridges, ramps or passenger lifts, with sturdy handrails, adequate time, trained assistance, privacy and genuine passenger choice about when to board and leave the aircraft.
 - **Cabin storage of disability aids:** Publish accessible information about permitted cabin aids and storage arrangements; provide optional priority boarding, crew assistance and storage close to the passenger; and reserve space for at least one adult-size manual wheelchair on aircraft with more than 100 seats.
 - **Using disability aids onboard:** Permit essential aids wherever safe and practicable, provide clear and consistent guidance, make reasonable adjustments, decide prior-approval applications within 48 hours when sufficient notice is given, and provide suitable alternatives where an aid cannot be used.
 - **Return of mobility aids:** Record and follow each passenger's preferred return location, prioritise unloading, return aids within 30 minutes, minimise handovers, provide continuous assistance, reassemble aids correctly and return them in the same condition.
 - **Accessible flight information:** Provide critical information before travel and take-off in formats including captions, Easy Read, audio, large print, Braille and Auslan; ensure compatibility with assistive technology; and provide free Wi-Fi where needed for communication or information access.
 - **Accessible food and drink services:** Provide accessible menus, packaging assistance, clear descriptions of meal contents and placement, suitable utensils, usable and clean tray tables, safer drink containers and timely assistance tailored to the passenger.
 - **Accessible aircraft toilets:** Adopt both proposed stages but set firm implementation deadlines; require grab rails, accessible locks, emergency call buttons, larger waste disposal and sufficient space for an onboard wheelchair and carer; and apply updated standards to new and existing fleets.
 - **Accessible in-flight entertainment:** Require accessible systems and controls, including larger buttons, easy-to-reach controls, captions, audio descriptions and screen-reader compatibility; provide instructions and staff assistance; and supply equivalent portable devices when built-in systems are inaccessible.
 - **Accessible passenger controls:** Require call buttons, screens, lighting, air-conditioning and seat-recline controls to be identifiable, reachable and operable with minimal force, with firm deadlines and public reporting for existing-fleet upgrades.
 - **Movable armrests:** Require movable armrests on aisle and designated transfer seats in new aircraft, increase their availability across existing fleets within a defined timeframe, identify them during booking and retain fixed-armrest options for passengers who prefer them.

1. Whole of Journey

Updating the Aviation Disability Standards to establish consistent requirements across airports and airlines would help create a more seamless passenger experience across the whole journey. Clear, nationally consistent regulations would also support aligned staff procedures, onboarding and ongoing training, giving staff greater clarity about their responsibilities and helping passengers with disability receive reliable assistance regardless of the airport, airline or stage of travel.

1.1 Roles and responsibilities of airports and airlines

MS Australia recommends that airports and airlines share responsibility for providing assistance across the whole air travel journey, with clearly defined roles, coordinated processes and seamless handovers between services. LEEP members unanimously supported this approach, generally identifying airports as responsible for accessible terminal facilities and assistance through the airport, while airlines should take greater responsibility from check-in or boarding through to arrival and baggage collection.

“It’s a shared responsibility, given more are travelling with disabilities, more personnel devoted to this area would create positive change.” – **LEEP Member Rowena**

Clear accountability and coordination at every stage is essential to ensure passengers with disability receive continuous, reliable support without gaps or confusion.

“It works best if both airline and airport are responsible and are coordinated particularly on arrival because sometimes airline staff will only take you to baggage collection and may abandon a passenger who may need assistance to make a connection to another airline or between domestic and international check in desk and/or make their way to a different terminal. There is a vast difference in Australia between Melbourne and Sydney and Qantas and Virgin.” – **LEEP Member Vanessa**

MS Australia recommends the Department establish shared responsibility between airports and airlines for assistance across the whole air travel journey, with clearly defined roles, coordinated processes and seamless handovers to ensure continuous and reliable support for passengers with disability.

1.2 Ensuring staff are trained to support people with disability

MS Australia supports the proposed training requirements and recommends consistent, disability-aware training tailored to individual needs, so staff can support travellers with disability throughout the passenger journey. This support should be coordinated through a clearly identified contact person or accountable service. LEEP members emphasised the need for trained staff, reliable end-to-end assistance, safe handling of mobility aids, clear communication and signage, and continuity of support during transfers, delays and cancellations.

“Disability awareness training for all staff at airports and airlines. The education is not consistent with all staff.” – **LEEP Member Janine**

Assistance should respond flexibly to each passenger’s needs, preserve energy and recognise that MS symptoms can be invisible and fluctuate throughout the journey. The [Hidden Disabilities Sunflower lanyard](#) is a positive way for travellers with disabilities to discreetly indicate that they may require additional support. As its use grows domestically and internationally, mandatory training is needed so airport, airline and connecting transport staff understand its significance, engage

respectfully with travellers about their requirements and provide appropriate assistance without requiring them to repeatedly explain or justify an invisible disability.

“The biggest thing for me is staff who understand MS, especially fatigue, heat sensitivity and mobility issues. I need safe handling of mobility aids; clear communication (especially during delays); transfers that don’t feel rushed; someone who listens when I explain what I need. If I get overheated or pushed too fast, I can go downhill quickly.” – **LEEP Member Rachel F.**

MS Australia recommends the Department require airports and airlines to provide regular training on disability accessibility and inclusion, fostering a strong culture of diversity and inclusion and helping to bridge the gap between good intentions and the lived experience of aviation travel. Training should be co-designed with people with disability and carers, included in onboarding for all relevant staff and reinforced through ongoing professional development. It should also address invisible disabilities and the significance of the Hidden Disabilities Sunflower lanyard.

1.3 Establishing disability reference groups

MS Australia recommends that every airport and airline be required to establish and maintain a disability reference group, regardless of passenger volume or location. A non-regulatory approach or continuation of existing practice would not provide the consistency, accountability or sector-wide coverage needed to ensure lived experience informs accessible aviation services. Although the proposed standard is a positive step, a minimum passenger threshold would exclude smaller, regional and remote services, where accessibility barriers may be particularly acute. Disability reference groups should meaningfully represent people with diverse disabilities and carers, including people living with MS and other neurological conditions whose disabilities may be invisible.

Potential barriers include the cost and administrative capacity required to recruit, support and remunerate members, particularly for smaller operators, and the risk of tokenistic consultation where groups lack influence over decisions. These barriers should be addressed through clear implementation guidance, reasonable resourcing and accessible participation options. Operators should also be encouraged to seek advice and practical support from disability representative organisations when establishing and maintaining their groups. Shared disability reference groups may be appropriate where airports or airlines have common ownership or closely integrated operations, provided that each location and service is considered, regional and remote perspectives are represented, and the arrangement does not weaken accountability or direct engagement with local passengers.

The Terms of Reference should establish minimum requirements for diverse and intersectional membership, transparent recruitment and appointment, accessible meeting formats and materials, remuneration and reimbursement of participation costs, and regular meetings. They should also require direct access to senior decision-makers; involvement in the design, review and monitoring of policies, facilities, procedures, training and complaints systems; publication of meeting outcomes and organisational responses; clear escalation pathways; and periodic evaluation of the group’s influence and effectiveness.

MS Australia recommends the Department require every airport and airline to establish and maintain a disability reference group, regardless of passenger volume or location, with no minimum passenger threshold. Where organisations have common ownership or closely integrated operations, a shared group should be permitted only if it meaningfully represents each location and service, including regional and remote communities, and preserves clear accountability for local accessibility outcomes. Membership should include people with diverse disabilities and carers, including people living with MS and other neurological conditions whose disabilities may be invisible. The Aviation Disability Standards should prescribe minimum Terms of Reference that ensure lived experience demonstrably influences accessibility policies, facilities, procedures and training across the aviation network.

1.4 Requiring annual reporting on how the Aviation Disability Standards are being met

MS Australia recommends that every airport and airline report annually on compliance with the Aviation Disability Standards, regardless of passenger volume or location. Regular and consistent reporting is essential to assess whether the Aviation Disability Standards are being implemented effectively and improving passenger outcomes. Limiting obligations to operators above a minimum threshold could leave significant accessibility barriers at smaller, regional or remote services unidentified and unaddressed. Reports should address overall compliance and include the number of

- disability aids lost or damaged;
- the amount, outcomes and refresher components of disability-awareness training;
- occasions when passengers are refused travel because of disability and the reasons given;
- assistance animals refused carriage; and
- complaints relating to injury or disability discrimination.

Consistent sector-wide reporting would strengthen transparency, accountability and monitoring of how the Aviation Disability Standards operate in practice.

MS Australia recommends the Department require every airport and airline, regardless of passenger volume or location, to report annually on compliance with the Aviation Disability Standards. Reporting should include disability aids lost or damaged; disability-awareness training and refresher training delivered and their outcomes; refusals of travel because of disability and the reasons for refusal; assistance animals refused carriage; and complaints relating to injury or disability discrimination. The Department should publish the results in a consistent and accessible format to support transparency, comparison and continuous improvement across the aviation sector.

2. Planning and Booking Air Travel

Accessible planning and booking are essential to ensuring people with disability can travel with confidence and without unnecessary barriers, costs or repeated disclosure of their needs. Passengers should be able to record optional assistance requirements, access clear information in suitable formats, receive the same fares and booking options across channels, and obtain timely decisions about assistance animals, mobility aids, carers, medical evidence and seating. Requirements must be nationally consistent, privacy-protective and based on individual functional needs and genuine safety risks rather than arbitrary limits or blanket rules. Airports and airlines should also provide reasonable assistance where needs arise at short notice, preserve agreed supports during disruptions, and clearly explain any refusal of travel or disability equipment while offering suitable alternatives or refunds.

2.1 Offering passenger assistance profiles

MS Australia supports airlines offering passengers an optional assistance profile focused on the practical support they need throughout their journey. People with disability often have to repeat their accessibility needs for each booking, while information already provided may not reach the staff assisting them on the day of travel. A brief, reusable profile could reduce this burden, improve continuity of support and help staff anticipate each passenger's needs, while allowing passengers to provide only the information they consider essential.

Useful information could include whether a passenger:

- can use stairs, walk to the aircraft door or their seat, or requires a wheelchair or transfer assistance;
- mobility, fatigue and heat sensitivity;
- eating, bathroom and rest needs;
- seating requirements rather than automatic aisle allocation;
- communication preferences;

- mobility aids, medication and medical equipment that must remain accessible in the cabin;
- assistance animals; and
- carer, nominated representative and emergency contact details.

Passengers should control the profile through an opt-in and opt-out process, determine who may receive communications on their behalf, and be able to update or remove information at any time. Review periods should reflect the travellers' changing needs, at least every 6–12 months, to capture fluctuating or progressive disability changes.

"I like this idea, and for me with [primary progressive multiple sclerosis] PPMS, my information would need reviewing/updating at least 6 monthly due to change in capabilities whilst travelling. Info of use would be capabilities with mobility, eating, bathroom visits, sleeping etc to help with the experience of the trip for traveller plus airline staff. Also, if require more area at seat to have medications etc as opposed to having in luggage which would have less moving around cabin and less stress working around seat belt signs." – **LEEP Member Jo**

LEEP members also raised significant concerns about privacy, including airline data security, the risk of a breach exposing sensitive health information and possible implications for matters such as travel insurance. Any identifiable information should therefore be securely stored, accessible only to staff directly involved in providing assistance and retained only with the passenger's consent or briefly after the journey. De-identified data may be retained for service planning, staff training and monitoring patterns of assistance, provided it cannot be linked back to an individual.

"On one hand I think this would be very valuable so that airline staff are aware if a person may ask for additional assistance or may have specific needs. However, I have significant concerns over how the data may be securely stored by airlines and the risks of a data breach exposing that information." – **LEEP Member Kate**

MS Australia recommends the Department require any passenger assistance profile to be optional, brief, focused on functional support needs and controlled by the passenger through clear opt-in and opt-out processes. The profile should be reusable across bookings with the same airline so passengers do not have to repeatedly provide the same accessibility information, and airlines must ensure the passenger-approved information is accurately transferred to the relevant airport and airline staff providing assistance on the day of travel. Passengers should decide what information is essential, who may communicate on their behalf and when their profile is updated or removed. Profiles should be easy to review at any time and at least every 6–12 months, with more frequent updates where needs change. Identifiable information must be protected by robust privacy and data-security requirements, accessible only to staff directly involved in providing assistance and retained only with the passenger's consent or briefly after travel. De-identified information may be retained for service planning, staff training and monitoring support needs only where individuals cannot be re-identified.

2.2 Prohibiting arbitrary limits on passengers requiring assistance

MS Australia recommends that airlines should not impose blanket limits on the number of passengers requiring assistance on a flight, except where a restriction is necessary to address a genuine and evidence-based safety risk. This would support equal access to air travel and align Australia more closely with approaches in the United States and European Union. LEEP feedback strongly opposed arbitrary caps, while recognising that emergency evacuation requirements, staffing capacity and the nature of each passenger's assistance needs may require careful planning.

“Many airlines already limit the number of passengers who need assistance on flights. I understand this from a safety risk management point of view in an emergency. However, it would be good to have research done and to have data on what is an appropriate number.”

– **LEEP Member Janine**

A fixed numerical threshold is unlikely to be appropriate because assistance needs vary significantly: some passengers can board, walk to their seat or travel with support from a companion, while others require transfers or more intensive assistance. Airlines should therefore assess needs individually, make reasonable operational adjustments and invest in appropriate staffing and equipment, including accessible airport transport options that conserve energy without unnecessarily assigning wheelchairs. Where a limit is imposed for safety reasons, the airline should explain the evidence and reasons to the passenger as early as possible, identify alternative arrangements and ensure that neither the passenger nor their travelling companion faces additional costs.

MS Australia recommends the Department prohibit airlines from applying blanket or arbitrary limits to the number of passengers requiring assistance on a flight. Any restriction should be based on an individual assessment of a genuine, evidence-based safety risk rather than disability status or a fixed numerical cap. Airlines should be required to publish their assessment criteria, provide affected passengers with clear written reasons as early as possible, offer reasonable alternatives and collect data to support future review of appropriate safety settings. Operational constraints should be addressed through adequate staffing, training, equipment and accessible infrastructure, without imposing higher fares or additional costs on passengers with disability or their companions.

2.3 Services required when passengers give advance notice of accessibility needs

MS Australia recommends that airports and airlines may request up to 48 hours' advance notice for assistance requiring planning, while encouraging passengers to identify their needs when booking where possible. LEEP members generally considered this a reasonable timeframe, particularly for powered mobility devices, and recognised that advance notice helps staff arrange appropriate assistance, equipment and connections. However, notification requirements must be clearly communicated, accessible and must not operate as hidden conditions of travel.

“They should have the option to indicate disability at time of booking. 48 hours is reasonable if it is clearly indicated at time of booking and easily accessible via the airline website etc. Otherwise, it remains an arbitrary timeline and another hidden airline rule that passengers aren't aware of.”

– **LEEP Member Rachel K.**

At the same time, MS symptoms can fluctuate unpredictably, and passengers may need assistance at short notice. A lack of advance notice should not result in refusal of travel or make a passenger feel that their needs are a burden. Airlines and airports should make all reasonable efforts to provide assistance, including during unforeseen circumstances, while recognising that the exact service may depend on the resources immediately available. Assistance requested in advance must also be reliably recorded and coordinated across the journey, particularly for transfers and connecting flights.

“Advance notice helps, but MS isn't predictable. Some days I'm fine, other days I'm not. If I can't give notice, I still need help. I shouldn't be made to feel like a problem because my symptoms don't run on a schedule.” – **LEEP Member Rachel F.**

MS Australia recommends the Department encourage airports and airlines to request up to 48 hours' advance notice for services that require planning, while encouraging passengers to provide notice at booking where possible. Notice requirements must be clearly disclosed, accessible and

easy to complete. Passengers who cannot provide notice, including because of fluctuating or unforeseen disability-related needs, must not be refused travel; airports and airlines should make all reasonable efforts to assist them with dignity and without penalty. Information provided in advance should be reliably shared with the staff responsible for assistance throughout the journey, including during transfers and connections.

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

MS Australia recommends that people living with MS and other neurological conditions be able to book flights at the same fare either online or by phone. Online booking systems may be inaccessible or difficult to use for people experiencing vision, cognitive, fatigue, dexterity or communication difficulties. Passengers travelling with mobility aids also often need to call the airline to communicate their requirements and confirm arrangements that cannot be completed online. Telephone bookings can take longer, attract additional fees or exclude passengers from sale fares available online. Passengers should be able to choose the booking method that best meets their accessibility needs without financial disadvantage. Airlines should ensure both online and telephone booking services are accessible and provide the same fares, discounts, inclusions and booking options.

“When booking online instead of having to go back into the website after you have booked your flight to then tell them about your wheelchair requirements it should all be part of the booking. Not one airline I have booked with has this as part of the booking system. You always have to go back in with your booking number and tell them about your requirements. This would be so helpful.” – **LEEP Member Carol**

MS Australia recommends the Department require airlines to ensure people with MS, other neurological conditions and disability can access the same fares, sale prices, inclusions and booking options whether booking online or by phone. Airlines should not charge additional telephone booking or service fees where a passenger uses that channel because of accessibility needs, and staff should be able to apply any online promotion or discount to the telephone booking.

2.5 Clarifying rules for carriage of assistance animals on aircraft

MS Australia supports clear and consistent requirements for travelling with assistance animals across all airlines. The Aviation Disability Standards should specify the evidence airlines may request and require applications to be decided within 48 hours where passengers provide at least 48 hours' notice. If an airline does not respond within that timeframe, the application should be treated as refused so the passenger can pursue a discrimination complaint. Passengers refused travel with their assistance animal should be entitled to choose a full refund or rebooking at no additional cost.

“Assistance animals should be supported without excessive paperwork.” – **LEEP Member Rachel F.**

MS Australia recommends the Department prescribe consistent evidence requirements for assistance animals and require airlines to determine applications within 48 hours where passengers give at least 48 hours' notice. A failure to decide within that period should be deemed a refusal, and passengers refused carriage with their assistance animal should be offered a full refund or rebooking at no additional cost.

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

MS Australia recommends nationally consistent requirements for the approval of battery-powered mobility aids, including powered wheelchairs and mobility scooters. Passengers currently encounter different forms, evidence requirements and advice across airlines, as well as repeated checks at check-in, security and connecting flights, even when an aid or battery has already been approved. The Aviation Disability Standards should provide one clear checklist covering the information required for different mobility aids and battery types, with accessible guidance available from the start of booking.

"I travel with a smart drive lithium battery which I am able to take off my chair and carry into the plane with me. But the forms I have to submit ahead of time is okay, but should be kept on file with the airline if I am flying them numerous times. Qantas is good as they can give you a year long form to carry with you, but it always takes lots of time at check-in and with the wheelchair you can't get your boarding pass online. It should all be online so that it makes it easier to get through to the plane." – **LEEP Member Carol**

Airlines should accept recognised battery certification, retain passenger-approved documentation for repeat travel for a defined period and provide an online approval process linked to the booking so passengers can check in and obtain boarding passes without unnecessary delay. Airport and airline staff must be trained to apply the requirements consistently, and any restrictions on lithium batteries should be communicated clearly before purchase and displayed prominently on the booking and ticket.

"I always allow an extra hour to negotiate check in. Despite having two certificates of approval this is always a huge problem and delay. There needs to be an international certification that you can carry with you and present at check in along with the battery. This does exist but 95% of staff don't recognise it and don't know what to do. We have to explain it to them. Sometimes the airline says the captain himself has to see the battery. It is particularly tedious if you have gone through all this rigmarole and satisfied everyone at your point of departure and you have to go through all the same routine at every transfer en route even if you are travelling with the same airline and merely changing planes. In my experience it isn't that the process isn't clearly understood by me, it's that the various people at check in and security and then on the plane aren't clear about it." – **LEEP Member Vanessa**

MS Australia recommends the Department require a single consistent approval framework for battery-powered mobility aids that accommodates the full range of devices and battery types used by people with disability. The framework should include standard information and evidence requirements across all airlines, recognised certification, online applications linked to bookings, reusable approvals for repeat travel, consistent recognition during transfers and clear pre-booking advice about any restrictions. Airports and airlines should also ensure check-in, security and flight staff receive regular training so approved devices are handled consistently without passengers having to repeatedly explain the requirements.

2.7 Ensuring disability aids can be transported free and in-cabin

MS Australia recommends that all disability aids be transported free of charge, including where a passenger requires more than one mobility aid, and that essential aids, medication equipment and approved mobility-device batteries be permitted in the cabin wherever safe and practicable. Consistent with the advance notice requirements proposed in section 2.3, airlines should also be required to decide requests to transport disability aids within 48 hours where passengers provide at least 48 hours' notice of travel.

LEEP feedback shows that passengers continue to encounter inconsistent rules and staff advice about transporting disability aids, medication equipment and mobility-device batteries. Experiences included a sharps bin being confiscated despite medical documentation, an approved scooter battery being challenged at security, staff attempting to check essential items that needed to remain with the passenger, and a second mobility aid being treated as excess baggage. While some travellers reported positive experiences when clear advice was provided in advance, members remained concerned about damage, conflicting information and unsafe in-cabin storage, including batteries being placed under seats rather than secured in overhead compartments. Clear information about permitted items and priority boarding timeframes would also reduce confusion and unnecessary public announcements.

“I’ve had staff give me conflicting information, try to check items that should stay with me, and I always worry about damage. Sometimes you get charged extra because staff don’t know what counts as a disability aid.” – **LEEP Member Rachel F.**

MS Australia recommends the Department require airlines and airports to transport all disability aids free of charge, including where a passenger requires more than one mobility aid, and permit essential aids, medication equipment and approved mobility-device batteries to remain in the cabin wherever safe and practicable. Consistent with section 2.3, airlines should be required to decide requests to transport disability aids within 48 hours where passengers provide at least 48 hours’ notice of travel. The Aviation Disability Standards should establish nationally consistent screening, documentation and storage requirements; require staff to recognise valid medical and battery certification; prevent essential items from being checked or charged as ordinary baggage; and ensure aids are stored securely to minimise damage and trip hazards. Airlines should provide clear information before travel and at the gate about permitted items, approval processes, priority boarding arrangements and applicable timeframes.

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

MS Australia recommends that a passenger with disability should only be required to travel with a carer or support person where there is a genuine safety need or a requirement for continuous medical, personal care or communication support.

LEEP members broadly agreed that passengers should not be required to bring a support person unnecessarily. Several considered that where an airline imposes the requirement, it should pay for or substantially subsidise the carer’s airfare, so the passenger is not financially penalised for disability. Others noted that passengers who need one-to-one care would ordinarily travel with someone they know and cautioned that any subsidy should include safeguards against misuse.

“Cost of living for people with a disability is already significant enough so any financial assistance in a case where it is not our choice for the carer/support to travel with us would be appreciated.” – **LEEP Member Jo**

MS Australia recommends the Department require airlines to impose a carer or support-person condition only when the passenger cannot travel safely without continuous assistance that airline staff cannot reasonably provide. Airlines should clearly explain the reasons for the decision and recognise that the passenger should be able to travel with a person they know and trust. Where the airline requires a companion who would not otherwise be travelling, it should cover or substantially subsidise the companion’s fare, including through participation in an appropriate companion-card scheme, with clear eligibility criteria to prevent misuse. Passengers should not incur additional costs solely because of disability.

2.9 Clarifying when airlines ask for medical certificates

MS Australia recommends that airlines request medical certificates only where there is a specific, evidence-based safety concern, such as a passenger's fitness to fly following surgery or the safe carriage of potentially hazardous substances or sharps. Certificates should not be routinely required for basic assistance, mobility aids or invisible and fluctuating disability symptoms.

LEEP member views were mixed, some considered evidence reasonable when assistance is requested or a genuine risk is identified, while others were concerned that a diagnosis alone cannot explain variable symptoms such as fatigue, mobility, cognition or heat sensitivity. LEEP members emphasised that practical support needs and how a condition presents during travel are often more relevant than a medical certificate and suggested a direct contact channel so passengers can explain these needs.

"When there is a safety concern - for example, I have had to provide medical certificates post-surgery to prove safety to fly. Beyond that, disabilities exist beyond the confines of a medical certificate - a medical certificate that says MS doesn't detail the variable levels of fatigue, movement difficulties, cognitive and executive function changes. It doesn't detail that when walking into the airport I appear fully functional, and by the time I disembark my flight I might need physical assistance to stand, retrieve my baggage etc. This is why a direct contact line would be invaluable - because the presentation and symptoms of a disability matter far more than the official diagnosis." – **LEEP Member Rachel K.**

MS Australia recommends the Department require airlines to limit medical-certificate requests to circumstances involving a clearly identified and proportionate safety risk. Airlines should publish consistent criteria explaining when evidence may be required, request it at booking or as early as practicable, and accept information focused on fitness to fly or the management of the specific risk. Medical certificates should not be used to verify routine accessibility needs, mobility aids or invisible and fluctuating symptoms, and passengers should not be required to disclose more medical information than necessary. Airlines should provide an accessible direct contact channel for passengers to describe their functional support needs and should ensure staff are trained to assess those needs without relying solely on diagnosis or appearance.

2.10 Ensuring information accessibility options are provided before booking

MS Australia recommends that airports and airlines provide comprehensive accessibility information before booking and across the entire travel journey, using a consistent and accessible format. Information should cover mobility-aid size and weight limits; airport navigation and interactive maps; dangerous-goods rules, including mobility-device batteries; booking and seating restrictions and the reasons for them; available airport and aircraft accessibility equipment; in-flight assistance; disability supports permitted or provided onboard; seating, seat functions and in-flight entertainment; and requirements for assistance animals, carers and support people. Providing this information early would help passengers assess whether a service can meet their needs, prepare required documentation and make informed booking decisions without having to search across different sources or contact multiple providers.

"It is important to know where your first point of assistance is going to be when you arrive at the terminal. Most airlines and airports don't tell you this. What to do when you are dropped off with a large suitcase and a mobility aid(s). How are you supposed to get from the curb to the check in desk. This is hardly ever done well. Even if there is a call phone or a button, you might be standing on the curb in freezing rain or 38 degree heat for half an hour before anyone responds. So often it is other passengers who take pity on you and help. I don't have a view on the booking system. Personally, I have given up and handed it over to a travel agent who understands my needs." – **LEEP Member Vanessa**

MS Australia recommends the Department require every airport and airline to publish accurate, up-to-date and accessible information about facilities, equipment, assistance, restrictions and

requirements across the whole journey before a passenger books. The Aviation Disability Standards should prescribe a common format, terminology and minimum set of information so passengers can readily compare services and receive consistent advice across airports and airlines. Information should be easy to locate through booking channels, provided in accessible formats, linked to the relevant airport, aircraft and route wherever possible, and clearly identify how passengers can obtain further advice or confirm individual accessibility arrangements.

2.11 Ensuring information needed to book flights is offered in accessible formats

MS Australia supports the proposed regulatory option to address current barriers that make flight-booking information difficult to access and use for people with disability. Requiring information about airports, aircraft and services in formats such as Auslan, Easy Read, Braille, pictorials and social stories and direct support would better meet diverse communication needs. An accessible booking mode containing only essential information, longer online booking sessions and direct support through dedicated phone lines or interpreters would also make booking simpler and reduce the risk of passengers being timed out before completing their arrangements.

MS Australia recommends the Department adopt the proposal and require airlines and airports to provide booking information in a range of accessible formats. Airlines should offer a simplified accessible booking mode, allow additional time to complete online bookings where needed, and provide direct assistance through accessible phone and interpreter services. These options should be easy to locate and available without additional cost.

2.12 Ensuring communication in accessible format is provided during disruptions

MS Australia recommends that airlines provide clear, accessible and timely communication about disruptions through passengers' preferred contact methods, followed by personalised support for people who have requested disability assistance. LEEP members emphasised direct updates by SMS, email or phone, supported by access to a staff member or dedicated contact line rather than relying only on digital or public announcements.

"The airline needs to communicate effectively and quickly and provide practical assistance to the person with disability. Ideally a "real person" to assist with any needs, rather than a digital notification or loud-speaker notification." – **LEEP Member Julie**

Airlines should preserve existing disability arrangements when rebooking, including accessible seating, mobility aids, carers or support people and assistance animals, and ensure replacement flights and accommodation can meet individual accessibility needs. During long, uncertain or overnight delays, passengers should not be left standing or waiting in lengthy queues, particularly where fatigue, heat sensitivity or other MS symptoms create safety risks. Appropriate refreshments, a secure temperature-controlled place to rest and accessible accommodation should be provided, and passengers should not be separated from their support person in replacement arrangements.

"Airlines should communicate the same time as all other passengers. Airlines should then have individual conversations with people with disabilities to provide the best individual support. Eg booking emergency accommodation that is accessible." – **LEEP Member Janine**

MS Australia recommends the Department require airlines to contact passengers who have requested disability support as soon as practicable when a disruption occurs, using multiple accessible channels and the contact preferences recorded in the booking. Airlines should provide an individual conversation with a suitably trained staff member or dedicated support service to explain the change, identify its impact and arrange replacement travel that continues all agreed accessibility supports. Any rebooking must keep passengers with their carer or support person and ensure replacement flights, seating, assistance, mobility-aid arrangements, assistance-animal requirements and emergency accommodation are accessible. During significant delays, airlines should provide practical assistance, including refreshments, seating or a safe temperature-controlled rest area and accessible overnight accommodation where required, without making passengers wait in prolonged queues or repeatedly advocate for essential support.

2.13 Ensuring communication occurs when disability or disability aids are not accepted for travel

MS Australia supports the proposed regulatory option, which would address the current lack of clear information and practical remedies when a passenger or their disability aid is refused travel despite at least 48 hours' advance notice. Requiring airlines to explain the refusal when the decision is made and provide written reasons within 10 days would improve transparency and accountability. The requirement to identify and offer suitable alternative flights at no higher fare or provide a refund where no suitable alternative is available, would also reduce the disruption and financial disadvantage experienced by passengers with disability.

MS Australia recommends the Department adopt the proposal and require airlines, where at least 48 hours' notice has been provided, to give clear reasons at the time a passenger or disability aid is refused travel and written reasons within 10 days. Airlines should offer to book the passenger and, where relevant, their disability aid on a suitable alternative flight at the lower of the original or new fare or provide a full refund where no suitable alternative is available. Information about review and complaints pathways should also be provided with the written reasons.

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

MS Australia recommends that passengers with disability be able to select, without additional charge, a seat that is necessary to meet their accessibility needs, including aisle seats, seats near toilets, seats with movable armrests or seats with additional space where required. LEEP members strongly supported fair access to suitable seating and emphasised that these are disability-related needs rather than preferences.

"There are seats that airlines do not give to disabled people (for safety reasons) so surely they can prioritise others without charging extra." – **LEEP Member Anne**

Members also recognised the need for safeguards against misuse but cautioned that evidence requirements, such as medical certificates, should be proportionate and should not create additional barriers or costs. Where a carer or support person is required, adjacent seating should also be provided without additional charge.

"Seats needed for disability reasons should be available without extra cost – aisle seats, seats near toilets, seats with moveable armrests. These aren't "preferences"; they're needs."
– **LEEP Member Rachel F.**

MS Australia recommends the Department require airlines to provide passengers with disability access to seats that meet their demonstrated accessibility needs without charging seat-selection or upgrade fees. Airlines should identify and make suitable seats available through accessible booking channels, including seats near toilets, aisle seats, seats with movable armrests and seats offering additional space where required, subject to legitimate safety restrictions. A required carer or support person should be seated adjacent to the passenger without additional charge. Any verification process should be simple, proportionate and focused on functional need rather than diagnosis, with safeguards against misuse that do not create unnecessary medical, administrative or financial barriers.

3. At the airport

MS Australia recommends nationally consistent requirements to make every stage of the airport journey accessible, safe and dignified. Passengers should remain in their own mobility device until the latest safe point; have access to fully accessible check-in and bag-drop facilities with staff support; and be able to quickly find clearly signposted assistance points at every airport, including regional airports. Airports should provide consistent, accessible wayfinding and disruption information; accessible parking, drop-off, pick-up and transport connections; and dignified security screening supported by trained staff. Minimum standards should also require accessible toilets, Changing Places facilities, quiet and sensory rooms, seating, lifts, transfer spaces and assistance-animal relief areas. Disability aids must be protected and tracked throughout the journey, while transfers should be passenger-directed, unhurried and supported by trained staff and suitable equipment.

“The most effective accessibility support would be to make sure you are looked after from the minute you arrive at the airport. If you have your own chair, then great you can get to the gate. If you have to wait for wheelchair assistance, then communication that you are waiting is a priority to make sure you aren't forgotten. Next is to make sure if you are transiting from one plane onto another or if you have arrived at your destination, that wheelchairs arrive at the door to the plane and not the oversize baggage. I have been left on a plane for a long time only to find out that my chair isn't coming. Then staff have to find assistance to get you to the luggage area.”

– **LEEP Member Carol**

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

MS Australia supports proposed regulatory option 1, which would allow passengers with disability to remain in their own mobility device for as long as possible. Personal mobility devices are familiar to their users and are often customised to meet individual posture, comfort and physical support needs. By contrast, airport and airline transport chairs are generally less comfortable and may not provide adequate or safe support. Passengers should therefore be able to choose when they transfer, with transfer occurring at the latest safe and practicable point – ideally at the aircraft door.

LEEP members emphasised that transfer timing should be agreed with the passenger rather than automatically occurring at check-in. Where transfer to airline equipment is necessary, members generally considered that it should occur at the aircraft door or no more than 10–15 minutes before boarding. Extended periods in a transport chair can cause pain and create safety risks, particularly when the chair is not customised to the passenger's needs. Passengers who have transferred must receive continuous assistance and should never be forgotten, left waiting for prolonged periods or pressured to walk through security or other parts of the airport because staffing or time is inadequate.

“Ideally, they would be able to stay in their own chair - people are well versed in their own aids. Transport chairs are generally less comfortable and for those with physical support needs and not customised to the individual.” – **LEEP Member Rachel K.**

MS Australia recommends the Department adopt Proposed Regulatory Option 1 and require airports and airlines to allow passengers with disability to remain in their own mobility device until the latest safe and practicable point, ideally at the aircraft door. The timing of any transfer should be agreed with the passenger. Where an earlier transfer is unavoidable, it should generally occur no more than 10–15 minutes before boarding unless the passenger chooses otherwise. Appropriate airline equipment and continuous assistance must be available immediately, and passengers must not be left unattended, forgotten or pressured to walk because staffing or time is inadequate.

3.2 Providing accessible check-in facilities

MS Australia supports the proposed regulatory requirements for accessible self-service check-in and bag-drop facilities. Currently, airport check-in facilities are not always accessible, preventing people with disability from checking in independently, requesting assistance or locating support. The proposal would require all self-service facilities to be co-designed with people with disability, fully accessible in their physical design and software, and supported by staff when passengers cannot use them independently.

MS Australia recommends the Department adopt the proposed regulatory requirements and ensure they apply to all self-service check-in and bag-drop facilities, rather than only a proportion of them. The Aviation Disability Standards should require accessible physical design and software, co-design with people with disability, and direct staff assistance whenever a passenger cannot use a facility independently.

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

MS Australia recommends clearly identified and accessible assistance points at key stages of the passenger journey, including arrivals, check-in, security, departure and arrival gates, and baggage claim. LEEP members emphasised that timely support is critical and that searching for help can be unsafe or difficult for people experiencing fatigue, unsteadiness, or processing and communication impairments. Every airport, including smaller and regional airports, should provide an easy-to-find staffed desk, concierge, call button or direct contact service during operating hours, with priority seating nearby.

MS Australia recommends the Department require every airport to provide clearly signposted and accessible points where passengers can promptly request information and assistance. This requirement should apply to all airports, including smaller and regional airports, through a proportionate model such as a staffed assistance desk, concierge, call button or direct phone service, so passengers and carers are not left to search for support when it is most critical.

3.4 Making wayfinding around airports consistent and accessible

MS Australia recommends the Department implement both options 1 and 2 to create nationally consistent and accessible airport wayfinding, developed and tested with people with disability. LEEP members called for clear, large and easily distinguishable signs for assistance points, accessible toilets, lifts, gates, baggage claim, transport connections, customer service and seating, supported by readable screens, captions, announcements, app and SMS updates, and maps showing estimated walking times to gates. Assistance points should be clearly marked at public and private transport drop-off areas, sheltered from weather and subject to a mandatory response time. Consistent colours, symbols and information across Australian airports would improve predictability and reduce the cognitive and physical effort required to navigate, particularly for passengers experiencing fatigue or cognitive symptoms.

“Even airport map/directional signage which indicates time to gate (average walk time) so appropriate time allowances are captured.” – **LEEP Member Jo**

MS Australia recommends the Department implement a combination of options 1 and 2 by establishing nationally consistent signage and wayfinding requirements and requiring airports to test them with people with disability. The Aviation Disability Standards should require prominent, accessible signs for key facilities and services; consistent colours and recognised symbols; information through visual, audio and digital channels; airport maps showing estimated walking times; and sheltered, clearly identified assistance points at transport drop-off locations with mandatory response times.

3.5 Providing information about travel changes and disruptions in accessible formats

MS Australia supports the proposal to require airlines to communicate flight changes and disruptions in accessible formats, including digital displays, public announcements, push notifications, voice-to-text, Easy Read, Braille and screen-reader-compatible personal-device notifications, with direct assistance where a passenger's preferred format is unavailable. However, accessible information alone is not sufficient: passengers with disability should also receive proactive support to understand changes and arrange suitable alternative travel, rather than being left to manage disruptions independently.

MS Australia recommends the Department require airports and airlines to provide timely flight changes and disruption information through multiple accessible formats and direct assistance where a passenger's preferred format is unavailable. The Aviation Disability Standards should also require proactive, personalised support to help passengers understand changes and arrange suitable alternative travel that preserves all agreed accessibility supports.

3.6 Improving access for arrivals and departures at the airport

MS Australia recommends that airports improve accessibility for arrivals and departures by providing sufficient accessible parking and free short-term parking close to terminals; accessible drop-off and pick-up areas with ramps, weather protection and clear signage; and nearby connections to public transport, taxis and rideshare services.

"Disability parking drop-off and pick-ups are filled by non-disabled people parking 'just for a minute'." – **LEEP Member Janine**

Passengers with disability should also be able to notify airports or airlines of their arrival and request assistance inside or outside the terminal, including support with baggage and transfers to ground transport.

MS Australia recommends the Department require airports to provide accessible parking, drop-off and pick-up areas, and public transport, taxi and rideshare connections as close as possible to terminal entrances. The number of accessible spaces should reflect passenger demand, free short-term parking should be available for people who need additional time, and passengers with disability should be able to request assistance both inside and outside terminal buildings.

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

MS Australia recommends accessible, consistent and dignified security screening for people with disability. The proposed requirements would provide optional priority screening lanes or assistance, disability-specific staff training, clear information in accessible formats, and tactile or audio guidance so passengers are not physically positioned without consent. Screening processes should also protect privacy and dignity and avoid separating passengers from disability aids, assistance animals, interpreters or carers.

"At some airports I can take my walking stick through security with me, at others I need to put it in a bin to go through the scanners and use an airport-supplied stick, and at others I've been braced and personally assisted to walk through the scanner while someone dusted my stick for explosives! It would be helpful to have a standard advice card at the entry to security screening at every airport explaining the requirements for mobility aids." – **LEEP Member Kate**

MS Australia recommends the Department adopt the proposed requirements and require nationally consistent security-screening procedures that provide optional priority access, accessible information, privacy and dignity, informed consent and continuity with disability aids and supports.

Security staff should complete disability-specific training, and any staff who manually assist passengers with disability should also be required to demonstrate competency through formal assessments.

3.8 Involving people with disability when designing accessible facilities at airports

MS Australia recommends nationally consistent minimum standards for accessible airport facilities, including accessible toilets and changing facilities, quiet and sensory rooms, seating and rest areas, assistance-animal relief areas, private transfer spaces, lifts and mandatory priority assistance points.

“Most airports have disabled seating, the problem is people without a disability use them, so that should be policed more. Definitely accessible toilets and quiet rooms. Priority assistance points should be mandatory.” – **LEEP Member Carol**

“More accessible toilets, rest areas and priority assistance points would be useful. An airport driven, mobility cart (similar to some used in big shopping centres) would be very helpful.”
– **LEEP Member Julie**

LEEP members emphasised that these facilities could make a substantial difference for people experiencing fatigue, sensory overload or limited mobility. Accessible toilets and sufficient reserved seating should be located close to assistance waiting areas and boarding gates, particularly where passengers may be waiting without their usual mobility aids, and priority seating should be clearly identified and kept available for those who need it. Assistance areas should also be adequately staffed so passengers are not left waiting without support.

“My biggest issues are:

- Standing in a long queue at security screening when I'm fatigued or dizzy.
- Not being able to find lifts access – I can't really use escalators due to my balance, and I can often see where I need to go but just can't work out how to get there.
- Not having a clear indication of how my walking stick should be managed at security screening.
- Having to stand in a long queue at the boarding gate when I'm fatigued or dizzy.
- Boarding with hand luggage is always a challenge. I often have difficulty finding a place for my bag unless I've embarked fairly early, which requires being closer to the front of the boarding queue and standing for longer.” – **LEEP Member Kate**

MS Australia recommends the Department require all airports to provide a nationally consistent minimum range of accessible facilities within clear implementation timeframes. The Aviation Disability Standards should specify the types, number, location and staffing of facilities needed to meet passenger demand, including accessible toilets and changing facilities, quiet and sensory rooms, seating and rest areas, assistance-animal relief areas, accessible transfer spaces, lifts and priority assistance points. Accessible toilets and clearly identified priority seating should be located near assistance waiting areas and gates, with measures to keep priority seating available for people who need it. Airports and airlines should co-design all new and upgraded facilities with people with disability and the people who will use them.

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

MS Australia recommends clear, enforceable standards requiring disability aids to be treated as essential equipment, kept as close to their owner as safely possible and protected from damage or loss throughout the journey. LEEP members emphasised that mobility aids are vital to a person's independence and should be handled respectfully by trained staff.

"A disability aid should be treated just as a person should be treated. A wheelchair is someone's legs; you would never throw a person around so a chair should be dealt with accordingly. A bar code could be put on the baggage tag that can be tracked with updates to the owner with the use of an app. To let them know if has been loaded, when it is off loaded and where it will be, delivered to the door or elsewhere." – **LEEP Member Carol**

Airlines should use barcode or equivalent scan-in and scan-out tracking at every handover and checkpoint, providing accessible real-time updates, preferably by SMS, with app or other options, confirming when an aid has been received, loaded, unloaded and where it will be returned.

"Scan in / scan out through each checkpoint, similar to a hospital patient setting for surgical patients - the tech for this already exists to include SMS notifications at each stage automatically. Staff training again here - on the importance of disability aids and keeping them safe." – **LEEP Member Rachel K.**

MS Australia recommends the Department require airlines to keep disability aids with or within sight of their owners wherever safe and practicable, and otherwise use prescribed equipment, handling procedures and competency-based staff training to protect them as essential equipment. Airlines should implement barcode or equivalent scan-in and scan-out tracking at every handover and checkpoint, with automatic, accessible updates by SMS, app or another passenger-selected format confirming receipt, loading, unloading and the return location. The Aviation Disability Standards should also define minimum handling requirements, reporting obligations and performance targets to enable consistent compliance monitoring and reduce preventable harm.

3.10 Providing choice for passenger transfer to airline wheelchairs and seats

MS Australia recommends safe, dignified, unhurried and passenger-directed transfers between mobility aids, airline wheelchairs and aircraft seats. LEEP members emphasised that staff should ask each passenger how they wish to be assisted rather than make assumptions, recognising that preferred methods vary. Passengers or carers should be able to record or update a preferred transfer method at booking or any later stage so airlines can allocate trained staff and suitable equipment, including wheelchairs, aisle chairs, hoists and slide boards. This equipment should be safe, consistently available and ready when needed.

"It's about preserving energy for me and other MS sufferers, so any mobility assistance (transfers) accessible toilets near check-in, and gates if having to wait for long periods of times. Clear communication with the boarding process, and if mobility aids like wheelchairs etc being utilised, how that plays out at the other end or trip." – **LEEP Member Jo**

MS Australia recommends the Department require airlines to ask passengers how they wish to be transferred and follow their preferred method wherever safe and practicable. Passengers or carers should be able to preselect or update transfer preferences from booking onwards so appropriate staff and equipment can be allocated. Airlines should provide adequately trained staff and ensure wheelchairs, aisle chairs, hoists, slide boards and other suitable transfer equipment are readily available, with transfers conducted safely, respectfully and without being rushed. Airlines should also publish accessible, up-to-date information about the transfer methods and equipment available at each airport before travel.

4. On the aircraft

MS Australia recommends nationally consistent requirements to make the aircraft experience accessible, safe and dignified. Passengers should have step-free boarding and genuine choice about when they board and disembark; accessible storage and use of disability aids; and prompt return of mobility aids at their preferred location. Airlines should provide critical information, food and drink services, entertainment and passenger controls in accessible formats, supported by trained staff and reasonable adjustments. Aircraft should also provide accessible toilets, suitable

seating with movable armrests and clear implementation timeframes so improvements are delivered across existing fleets as well as new and refurbished aircraft.

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

MS Australia recommends safe, step-free and dignified boarding and disembarkation at every airport. LEEP members called for aerobridges, accessible ramps or external passenger lifts wherever stairs cannot be used, together with sturdy handrails, trained staff and enough time to board or leave the aircraft safely without being rushed.

“Aisle chairs, hoists, slide boards, trained staff, and the ability to explain your preferred method. Transfers should feel safe and dignified, not rushed or rough.” – **LEEP Member Rachel F.**

Passengers travelling alone should be able to request a staff member to provide close support on stairs, while mobile lifts and other boarding equipment should offer appropriate privacy. Airports should also provide clear information at check-in about the distance and estimated walking time to gates, with assistance available for passengers who cannot safely manage long distances. Passengers with disability should retain genuine choice about when they board and disembark, including the option to board early or leave after other passengers where this is safer or more comfortable.

“I don't know if there's such a thing as "priority leaving", or whether, like me if I am unsteady on my feet, people with disability just try to leave the aircraft last. This means I'm not rushed down the stairs or hustled around with the rest of the people on the plane trying to disembark.”
– **LEEP Member Julie**

MS Australia recommends the Department require airlines and airports to provide safe, step-free boarding and disembarkation at all airports through aerobridges, accessible ramps or external passenger lifts, with sturdy handrails wherever stairs remain in use. Passengers should be given sufficient time and be able to request trained staff assistance, including close support on stairs, without being rushed or hand carried. Boarding equipment should protect passengers' privacy, and airports should provide clear information at check-in about the distance and estimated walking time to gates and offer assistance for long distances. Passengers with disability should be able to choose when they board and disembark wherever safe and practicable, with any restriction individually justified, minimised and communicated in advance.

4.2 Supporting passengers to store disability aids in the cabin

MS Australia supports the proposed requirements to help passengers keep permitted disability aids and medical equipment accessible in the aircraft cabin. Airlines should provide a clear, accessible list at booking and at the airport explaining which items may be carried and where they can be stored.

Passengers should be able to board early to secure priority storage, receive cabin-crew assistance to store and retrieve their items, and have aids kept as close as possible to their seat. Aircraft with more than 100 seats should also provide priority space for at least one adult-size manual wheelchair.

MS Australia recommends the Department adopt the proposal and require airlines to publish clear, accessible information at booking and at the airport about disability aids and medical equipment permitted in the cabin and their storage arrangements. Airlines should provide optional priority boarding, cabin-crew assistance with storage and retrieval, and storage as close as possible to the passenger, including space for items not needed urgently during the flight. Aircraft with more than 100 seats should provide priority space for at least one adult-size manual wheelchair.

4.3 Allowing people to use their disability aids onboard

MS Australia recommends that passengers be able to use essential disability aids onboard wherever safe and practicable. Airlines should provide clear, accessible and consistent information about items such as crutches, medical devices, assistance animals and specialist support harnesses, including when they must be secured during take-off, landing or turbulence and how passengers can continue to access them through reasonable adjustments.

“A list of pre-approved disability aids would be great, however, as long as it’s created in consultation with people with a disability and alternatives are considered / provided. You can’t tell someone they can’t have an aid they need every day without giving them info on how they can receive that support while said aid is unavailable.” – **LEEP Member Rachel K.**

Approval processes for aids requiring prior assessment should be nationally consistent, timely and applied by trained staff. Where at least 48 hours’ notice is provided, applications should be decided within 48 hours. Airlines should also explain which disability aids they can provide, such as support harnesses, and offer a suitable alternative where a passenger’s essential aid cannot be used.

MS Australia recommends the Department adopt the proposal and require airlines to permit passengers to use essential disability aids onboard wherever safe and practicable. Airlines should publish clear, accessible and nationally consistent information about permitted use, securing and storage requirements, assistance animals, aids available from the airline and approval processes for items such as specialist support harnesses. Staff should be trained to apply these requirements consistently and make reasonable adjustments so passengers can access their aids during the flight. Where a passenger provides at least 48 hours’ notice, any prior-approval application should be decided within 48 hours. If an essential aid cannot be used, the airline should explain why and provide a suitable alternative that meets the passenger’s functional support needs.

4.4 Return mobility aids as soon as possible on arrival

MS Australia recommends that mobility aids transported in the cargo hold be treated as priority items, correctly reassembled and returned in the same condition within a clear timeframe – such as 30 minutes after arrival. LEEP members emphasised that passengers must be able to choose the return location, as for many, immediate return at the aircraft door is essential because travelling to baggage claim without their aid is unsafe and additional handovers increase the risk of loss or damage; others prefer collection with their checked baggage.

Airlines should record and follow each passenger’s preference, avoid inconvenient special-luggage collection points unless requested, and provide continuous assistance until the aid is returned. Staff should follow passenger-supplied assembly instructions wherever practicable, and airports should provide equipment such as baggage lifts to support prompt return.

“That depends on the person's preference. Some people need or want their equipment at the aircraft door. I don't want that. I check my equipment and collect it from baggage claim. Sending it to the special luggage outlet is very inconvenient. It's always a long way from the normal carousel where your suitcase is arriving. There is always a risk that it will get lost, that you'll get separated from your staff member assistant and or your support person. it makes life very difficult for the passenger and anyone who is helping them, it causes unnecessary delays and I don't think that it makes it any safer for the item.” – **LEEP Member Vanessa**

“Disability items should be a priority, as they are often time poor when moving from A-B due to the obvious.” – **LEEP Member Rowena**

“It should be made a priority and returned asap.” – **LEEP Member Anne**

“At the aircraft door - less transit points = less chance for the aid to be lost or damaged.”
– **LEEP Member Rachel K.**

“Where you request it to be returned to. I request for my chair to be returned to the plane door. I do not leave the aircraft until it has arrived.” – **LEEP Member Janine**

“Immediately – ideally at the aircraft door. Walking to baggage claim without your aid is unsafe.” – **LEEP Member Rachel F.**

“Definitely returned to the aircraft door! If they took it to the door, it should be returned to the door.” – **LEEP Member Carol**

“I had my wheelchair provided to me as soon as I exited cabin door. Ground crew had it brought up to me immediately upon landing which was fabulous. This was multiple layovers and internationally too (United Airlines).” – **LEEP Member Jo**

MS Australia recommends the Department require airlines to record and follow each passenger's preferred return location for their mobility aid. Where the passenger requests return at the aircraft door, the aid should be prioritised for unloading and delivered immediately after disembarkation; passengers who prefer baggage claim should be able to collect it with their checked baggage rather than from a distant special-luggage outlet. Mobility aids should be returned within 30 minutes of arrival, with handovers minimised, continuous assistance provided until return, and the aid reassembled in accordance with the passenger's instructions and returned in the same condition in which it was received. Airports should provide the infrastructure and equipment needed to meet these requirements.

4.5 Providing critical in-flight information in accessible formats

MS Australia supports the proposed requirements to provide critical flight information in formats passengers can understand and process. LEEP members called for a dedicated source covering safety and emergency procedures, flight updates, onboard facilities and how to use them, available in advance and before take-off through captions, Easy Read, audio, large print, Auslan and other selectable language options.

“Captions, Easy Read, audio, large print, and the option to view instructions on your own device. Fatigue and cognitive issues mean I need information in a format I can actually process.” – **LEEP Member Rachel F.**

Information should be accessible on a passenger's own device or an airline-provided device, compatible with screen readers and other assistive technology, and linked to pre-flight communications such as check-in reminders so passengers have time to review it. Passengers who need Wi-Fi to access this information or use a communication device should receive it free of charge.

“A video / brochure that is available through the passenger's own device and compatible with accepted accessibility tools, like screen readers and captioning, with ASL and other languages as options for selection. Plane Wi-Fi being free would be helpful for this, also sending the passengers the info in advance so they have time to digest the info could also help - e.g., the same popup that reminds you to check in could also link to info about your aircraft/ safety demo.” – **LEEP Member Rachel K.**

MS Australia recommends the Department adopt the proposal and require airlines to provide critical flight information before travel and before take-off in a range of accessible formats, including captions, Easy Read, audio, large print, Braille, Auslan and other selectable language options. A dedicated, comprehensive source should cover emergency procedures, flight updates, onboard facilities and how to use them, and be accessible on passengers' own devices or airline-provided devices through content compatible with screen readers, captioning and other assistive technology. Airlines should link this information to pre-flight communications and provide free Wi-Fi where a passenger needs it to access the information or use a communication device during the flight.

4.6 Making in-flight food and drink more accessible

MS Australia supports the proposed requirements to make in-flight food and drink services more accessible. LEEP members highlighted the need for clear, accessible menus; help opening packaging; and staff explaining what has been served and where items are placed, particularly for passengers with hand weakness or other dexterity limitations. Airlines should also provide suitable utensils, sufficient tray-table space, clean tray tables or sanitising wipes, and stable drink containers that reduce the risk of spills. Assistance should be available on request and tailored to each passenger's needs.

"Clean tray tables - or wipes available. My last few flights, I have popped my tray table down as I needed the stability to eat but it was filthy from previous occupants so I couldn't use it. Also, larger cups for their drinks, the current cups are short and wide, making them very easy to spill with the slightest bump. Taller / narrower cups would help here and the gross area when stacked in bulk would be similar, given they'd be narrower, so it shouldn't cause a space management concern."
– **LEEP Member Rachel K.**

MS Australia recommends the Department adopt the proposal and require airlines to provide accessible menu information, assistance to open food and drink packaging, and clear descriptions of meal contents and their placement on the tray table. Airlines should also provide suitable utensils, sufficient usable tray-table space, clean tray tables or sanitising wipes, and stable drink containers that reduce spills. Cabin crew should provide timely assistance on request, tailored to each passenger's functional needs.

4.7 Improving accessibility of aircraft toilets

MS Australia recommends implementing accessible aircraft toilets as soon as possible, with clear and enforceable deadlines rather than relying only on aircraft replacement or refurbishment cycles. LEEP members identified grab rails, easy-to-use locks, emergency call buttons and sufficient space for an onboard wheelchair and carer as essential features. Accessible toilets should also provide larger disposal facilities for incontinence products.

"Grab rails would be very beneficial for me in an aircraft toilet, as well as an emergency call button." – **LEEP Member Julie**

"Need grabrails for walls where able and especially toilet and larger spot to dispose of incontinence u/garments. Spot for waste disposal is quite small." – **LEEP Member Jo**

Where a larger toilet is provided for wheelchair access or carer assistance, it should be a clearly designated facility with measures to keep it available for passengers who need it. New aircraft should meet the updated accessibility standard from commencement, while existing fleets should be upgraded within a defined transition period.

MS Australia recommends the Department adopt both stages of the proposal but set firm implementation dates that deliver accessible aircraft toilets sooner than fleet renewal or refurbishment alone would allow. Accessible toilets should include grab rails, easy-to-use locks, emergency call buttons, larger incontinence-waste disposal and sufficient space for an onboard wheelchair and carer. Dedicated accessible toilets should be clearly identified and kept available for passengers who need them. All new aircraft should meet the updated accessibility standard from commencement, while airlines should introduce Stage 1 features across existing fleets within a defined transition period, supported by milestones and public reporting.

4.8 Making in-flight entertainment accessible

MS Australia supports the proposal to ensure passengers with disability have equal access to digital in-flight entertainment. LEEP members highlighted the need for larger buttons, easy-to-reach controls, closed captions, audio descriptions and screen-reader compatibility, particularly for passengers experiencing fatigue or hand weakness. Airlines should provide clear written or verbal

instructions and, where requested, staff should confirm that passengers know how to use the entertainment system and other controls.

“Efforts should be made to confirm the person knows how to use everything; written or verbal instructions should be available.” – **LEEP Member Anne**

At the start of each flight, passengers should also be told where the assistance call button is located and encouraged to use it for help or information. Where a built-in entertainment system is not accessible, airlines should supply enough accessible portable devices with the same or comparable content for every passenger with disability who requests one.

MS Australia recommends the Department adopt the proposal and require all digital in-flight entertainment systems and controls to be accessible, including through larger buttons, easy-to-reach controls, closed captions, audio descriptions and screen-reader compatibility. Airlines should provide clear written or verbal instructions; ensure staff can assist passengers to use the system and advise passengers at the start of each flight where the assistance call button is located. Where an aircraft's built-in system is not accessible, airlines should provide sufficient portable devices with equivalent accessible content to meet the needs of every passenger with disability who requests one.

4.9 Requiring aircraft to have accessible passenger controls

MS Australia recommends that all passenger controls be easy to locate, reach and operate with minimal force, including call buttons, seatback screens, in-flight entertainment, lighting, air-conditioning and seat-recline controls. MS Australia supports the proposal to require accessible controls on new aircraft above the prescribed seating threshold and during major refurbishments. However, clear and enforceable implementation timeframes are needed so passengers are not required to wait for routine fleet replacement or refurbishment cycles.

MS Australia recommends the Department adopt the proposal and require accessible passenger controls that are clearly identifiable, within easy reach and operable with minimal force. The Aviation Disability Standards should set firm implementation dates for upgrades across existing fleets, alongside immediate requirements for eligible new and substantially refurbished aircraft, with milestones and public reporting to ensure progress is not dependent solely on aircraft replacement cycles.

4.10 Increasing the number of aircraft seats with movable armrests

MS Australia recommends increasing the number of aircraft seats with movable armrests to support safer transfers and greater seating choice for passengers with disability. LEEP members generally supporting movable armrests, particularly on aisle seats, while noting that some passengers prefer fixed armrests for stability or to maintain their personal space.

“Moveable armrests certainly make life easier, and I can see that they are indispensable for some people with a disability. It should be a priority at least in some rows or seats.”
– **LEEP Member Vanessa**

At a minimum, movable armrests should be prioritised on aisle seats and designated transfer seats in a sufficient number and distribution to meet passenger demand. All eligible new aircraft should include them, with a clear and timely transition plan for existing fleets.

MS Australia recommends the Department require all eligible new aircraft to provide movable armrests on aisle seats and designated transfer seats, with enough suitably located seats to meet passenger demand. Airlines should rapidly increase their availability across existing fleets within a defined transition period and clearly identify these seats during booking. Passengers who prefer fixed armrests should retain access to suitable seating, so the requirements provide choice as well as safer transfers.

Conclusion

The Aviation Disability Standards are an important opportunity to establish a nationally consistent, enforceable and passenger-centred framework for accessible air travel. The Aviation Disability Standards should give airports, airlines and aircraft operators clear responsibilities across the whole journey, while ensuring passengers with disability receive timely information, coordinated assistance, safe and dignified treatment, and genuine choice about how their support is provided.

“I think Australian Aviation needs a department relating to all travel for persons with disability, this would ensure policy and procedures are adhered to and relevant, and most of all, providing the opportunity for people to travel longer, see family and strengthening health and wellbeing.”

– **LEEP Member Rowena**

People with disability and carers must be meaningfully involved in designing, implementing and monitoring these reforms. Clear transition deadlines, annual public reporting, competency-based staff training and effective disability reference groups will be essential to translate the Aviation Disability Standards into consistent improvements across metropolitan, regional and remote services.

MS Australia urges the Department to adopt the recommendations in this submission and implement the reformed standards without unnecessary delay. Doing so would reduce preventable barriers, protect the safety and dignity of passengers, and enable people with disability, including people living with MS, and their carers to travel with greater confidence, independence and certainty.

Reference

¹ Australian Bureau of Statistics (2022), [Disability, Ageing and Carers, Australia: Summary of Findings](#), ABS Website, accessed 16 July 2025.

