



UK Airport Consultative Committees - Liaison Group

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Mrs Abimbola Alli
Civil Aviation Division
Zone 1/28
Department for Transport
Great Minster House
76 Marsham Street
London, SW1P 4DR

25th June, 2007

Dear Ms. Alli,

Access to Air Travel for Disabled Persons and Persons with Reduced Mobility: UK Consultations

Thank you for providing us with the opportunity to comment on the Department's proposals for the enforcement of European Regulation (EC) No. 1107/2006 in the UK.

Since 1980 the Chairmen and Secretaries of the Consultative Committees of the larger UK airports have met annually to share experience, to discuss matters of common interest and to provide advice to the Government on a range of aviation issues. There are now twenty-two airport consultative committees participating in the Liaison Group (as listed below).

At its annual meeting at Stansted earlier this month the Liaison Group considered the Department's proposals. Our views are set out below:

- (a) The meeting expressed very strong overriding doubts whether in relation to the provision of very personal services of this kind the introduction of a regime of criminal sanctions was the best option. The Liaison Group is concerned that there will always be the question of subjectivity (who decides the status of a PRM?) and this could be an issue for the courts given the adoption of a criminal sanctions regime. There will also be much room for interpretation across the 17 categories of offence. Whose fault will be a common question. Although it is noted that it is intended to use criminal sanctions as a last resort, the Liaison Group believes that there should be a more sympathetic approach to the enforcement of the Regulation and therefore urges the Department to reconsider the option of administrative sanctions with appropriately designed penalties dissuasive enough to ensure compliance.

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Aberdeen - Belfast City – Birmingham - Bristol International - Cardiff Wales International - Durham Tees Valley - Edinburgh - Inverness – Glasgow - Glasgow Prestwick - Leeds Bradford - Liverpool John Lennon - London City - London Gatwick - London Heathrow - London Luton - London Stansted – Manchester - Newcastle - Nottingham East Midlands - Robin Hood Doncaster Sheffield – Southampton

(b) If, however, the present proposal for a regime of criminal sanctions is confirmed then the meeting offered the following comments:

- 1) If following the complaints handling/decision process it is found that an airport has shortcomings in the service it provides, are mechanisms included to inform the Airport, and its consultative committee, so that remedies can be taken forward and monitored? If there are none can such mechanisms be considered?
- 2) Airport Consultative Committees would welcome the opportunity to be kept informed of substantive complaints arising at its airport. The Liaison Group therefore asks whether the CAA and/or the DRC can put arrangements in place to ensure this happens.
- 3) It was questioned whether the level of penalty in respect of offences under Articles 7.1-7.3, 7.5-7.6 and 10 is appropriate. Should not the penalties in this category be unlimited?
- 4) The Liaison Group would like the opportunity to be represented on the Working Group being set up to review the 2003 Code of Practice "Access to Air Travel for Disabled People". We would also welcome involvement at an early stage in the Review process so that the Working Group can consider our views.
- 5) A few Airports have already introduced the new arrangements. The Liaison Group has suggested that the experienced gained by those airports be shared among other airports.

I trust our comments will be taken into account.

Yours sincerely,

(Sgd.) Paula Street

Paula Street
Liaison Group Secretariat