



# EDF reply to the consultation on EU-wide multimodal travel information services under the ITS Directive 2010/40/EU

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## The European Disability Forum (EDF)

EDF is the European umbrella organisation representing the interests of 80 million persons with disabilities in Europe. It is EDF's mission to ensure that persons with disabilities have full access to human rights and fundamental freedoms through their active involvement in policy development and implementation in Europe. EDF is a member of the International Disability Alliance and works closely with the European institutions, the Council of Europe and the United Nations.

### Introduction

EDF fully supports the move towards integrated and comprehensive multi-modal travel information and planning services (MMTIPs) as it makes traveling between different Member States easier for all passengers. However, when talking about MMTIPs, it is first and foremost important to make sure that any solution proposed is accessible to all passengers, including persons with disabilities. Accessibility means in this case not only the technical access but also the type of information provided and how it is presented, e.g. in easy-to-read format, supported by illustrations, using pictograms and symbols, etc. This is important to make sure that the travel information is useable for all persons with disabilities.

Accessibility must be understood and addressed in the same way as other key characteristics of the digital environment, such as privacy, security or data protection. Therefore, EU legislation on Intelligent Transport Systems (ITS) should ensure that an appropriate level of accessibility is enforced in all legislation, linked to the Digital Single Market Strategy (DSM)<sup>1</sup>. Requiring interoperability with assistive technologies should also be highlighted in order to give access to MMTIPs to people that use technologies such as screen-readers or screen magnification software, hearing aids (induction loops), subtitling, etc.

If the multi-modal travel information services under the ITS Directive lack a universal design approach that ensures accessibility, it will prevent a broad range of passengers from taking advantage of new technologies in transport, as well as many European companies from competing with innovative and accessible services and products across Europe. To achieve this goal it is necessary to consult and actively involve them and their

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<sup>1</sup> European Commission, 10 Priorities, Digital Single Market, <http://ec.europa.eu/priorities/digital-single-market/>; retrieved on 23 November 2015



representative organisations in the policy making and standards development alike.

In line with Articles 5 (2) 9 1, and 2 (f) and (H) of the United Nations Convention on the Rights of Persons with Disabilities (UN CRPD)<sup>2</sup> and the General Comment N° 2 of the UN Committee on the Rights of Persons with Disabilities<sup>3</sup>, EU legislation on transport must ensure full, equal and unrestricted access for all potential consumers, including persons with disabilities and older people, taking full account of their needs, dignity and diversity.<sup>4</sup> A denial of access to both the physical environment as well as information services open to the public should be viewed in the context of discrimination.

Therefore, EDF has drafted this reply to the public consultation by the European Commission and is happy to engage in more close cooperation and exchange of knowledge with the Commission on this topic in the future.

## **Current difficulties for persons with disabilities when using travel information services**

By using multi-modal travel information services that are accessible, persons with disabilities would experience a much greater ease of traveling. This is especially true for travel between EU Member States, which is at the moment still complicated for several reasons:

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<sup>2</sup> United Nations Convention on the Rights of Persons with Disabilities (UN CRPD), <http://www.un.org/disabilities/convention/conventionfull.shtml>, retrieved on 23 November 2015

<sup>3</sup> General Comment No. 2 on Article 9 of the United Nations Convention on the Rights of Persons with Disabilities (UN CRPD) of 11 April 2014, [http://tbinternet.ohchr.org/\\_layouts/treatybodyexternal/Download.aspx?symbolno=CRPD/C/GC/2&Lang=en](http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CRPD/C/GC/2&Lang=en) (retrieved on 17 November 2015)

<sup>4</sup> To illustrate an example related to accessible travel information under the ITS Directive in relation to the UN CRPD, we would like to draw your attention also to the case of Mr F vs Austria, in which the UN Committee recommended to remedy the lack of accessibility of travel information in the Linz public transport network: Specific recommendation of the United Nations Committee on the Rights of Persons with Disabilities, (communication No. 21/2014, Views adopted on 14 September 2015), [http://www.klagsverband.at/dev/wp-content/uploads/2015/09/UN-Empfehlungen\\_Mr\\_F\\_engl\\_110915.pdf](http://www.klagsverband.at/dev/wp-content/uploads/2015/09/UN-Empfehlungen_Mr_F_engl_110915.pdf); retrieved on 23 November 2015



- Websites of transport operators are not always accessible so it is difficult to find information in the first place<sup>5</sup>
- The booking process is often complicated and involves several websites, operators and booking mechanisms which is confusing for all passengers and especially for persons with disabilities
- Even after managing to purchase (a) ticket(s) via different sales channels and finding information about connections, there is no harmonized way to indicate whether stations or vehicles are accessible.
- Existing travel information services do not always take into account accessibility in their travel planners by e.g. calculating longer transfer times or transfers only at stations that are accessible.
- Even if information is available in different accessible formats, unfortunately it is not always specified what those are (e.g. if sign language interpretation for deaf people is provided, it is not clear if there is an on-site sign language interpreter or remotely using a public relay service).
- Even if information about accessibility at the transport interchanges are available, accessibility of the urban environment makes a fully accessible door-to-door travel chain almost impossible.
- Booking assistance at stations and interchanges is not harmonized at the moment. If you buy a through-ticket involving different transport modes (e.g. from plane to train), assistance according to the different Regulations on passengers' rights should also be coordinated automatically to avoid placing that burden on the passenger.

By providing an integrated, comprehensive EU-wide and multi-modal travel information system that is inclusive and accessible, these problems could be solved.

## Benefits of EU-wide comprehensive multi-modal travel information

By tackling the problems mentioned above, MMTIPs can contribute to the inclusion of persons with disabilities in society by making transport more accessible as a whole. To illustrate the potential benefits, here are a few expected positive outcomes:

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<sup>5</sup> For more information on EDF's position on web accessibility see the "Library" section of the EDF website: [http://www.edf-feqh.org/Page\\_Generale.asp?DocID=19400&langue=EN&namePage=library](http://www.edf-feqh.org/Page_Generale.asp?DocID=19400&langue=EN&namePage=library) ; retrieved on 23 November 2015





- By making travel information more accessible, the number of passengers will rise and there will be a boost in ticket sales
- Planning inclusive and accessible systems from the outset and making them interoperable will save money and work in the future since adapting existing systems is usually more difficult and expensive
- An inclusive and accessible system facilitates participation in society for persons with disabilities, e.g. to travel to their place of employment or education or to participate in cultural events.
- A service that is easier to use and provides comprehensive information will increase passengers satisfaction in general
- The data collected can also contribute to statistics in other areas which are currently under-developed
- An accessible environment, both physical and digital, facilitates the use for all passengers and improves safety.

## Recommendations

When designing MMTIPs, it is important to keep in mind several aspects to make sure they are accessible to everyone:

- The development of MMTIPs should not lead to a reduction in the level of services currently available to persons with disabilities e.g. information via the phone, station staff or staff on-board of trains. Passengers should always have the choice on how they would like to receive their information and MMTIPs can be one of the options.
- The design approach should take into account all persons with disabilities, including persons with intellectual and/or psychosocial disabilities, persons with disabilities who require more intensive support and deafblind persons. Special attention should also be given to women and girls with disabilities as well as migrants with disabilities. Only by including the whole range of potential users of MMTIPs can the outcome be inclusive.
- Accessibility should be considered beyond the design stage, i.e. also in the management and maintenance of the services.
- The MMTIPs should refer to and be in line with existing legislation in the field such as the EU passengers' rights legislation and the Technical Specifications on Rail Interoperability for Persons with Reduced Mobility (TSI-PRM).
- Information about the right to travel with a personal assistant should be made easily available for all transport modes in the travel chain



- MMTIPs should both be accessible in terms of the format in which it is presented (e.g. compatibility with assistive devices, adhering to web accessibility guidelines, variety of communication channels, etc.) as well as covering specific information on accessibility of the trip itself which are relevant for the passenger (e.g. transfer times, accessibility of interchanges, travel disruptions, etc.).
- Regardless of the technology's efficiency it is always necessary that the employees in contact with travelers feel empathy and sensitivity towards people with disabilities. It is therefore recommended to train employees in order to guarantee the best support to people with disabilities.
- To ensure inclusivity and accessibility when developing new MMTIPs, representative organisations of persons with disabilities should be consulted systematically, considering the diversity of needs of all persons with disabilities.

## Conclusion

EDF supports the development of EU-wide integrated multi-modal travel information services but underlines that all services should be accessible for everybody. Information on accessibility of transport should also be included in the data collected and provided to the passengers to facilitate independent and spontaneous travel of people with disabilities.

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### Related EDF documents:

- [EDF report on the situation of passengers with disabilities 2015](#)
- [EDF reply to the public consultation on the mid-term review of the 2011 White Paper on Transport](#)
- [EDF's second position paper on the proposal for a Web Accessibility Directive](#)



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