



EDF feedback to EC roadmap consultation on contingency plan for transport

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Who we are

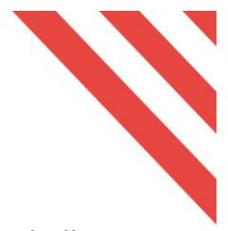
We, the European Disability Forum (EDF), are an umbrella organisation of persons with disabilities that defends the interests of over 100 million persons with disabilities in the EU. We are a unique platform run by persons with disabilities and their families, and a strong, united voice of persons with disabilities advocating for the implementation of the UN Convention on the Rights of Persons with Disabilities (CRPD) in the EU.

Introduction

EDF welcomes the European Commission's initiative to prepare a crisis contingency plan with the objective to coordinate response measures in the transport sector on the basis of lessons learned and initiatives taken since the beginning of the COVID-19 pandemic. Even though the initiative does not foresee a 'hard' legislative measure, as it is planned to result in a Communication, it is positive that it plans to "examine whether there is a need to introduce further legislative changes, provide additional guidance or policy recommendations" with the possibility of separate legislative proposals after this exercise.

It is also positive that the Roadmap recognises the effect of the COVID-19 pandemic on passengers. **The planned Communication should not only consider passenger numbers and traffic, but address gaps in protection of rights of passengers.** In this context, equal right to transport of passengers with disabilities needs particular attention, as the pandemic showed, it was even more vulnerable to infringement. As in almost all areas of life, [the negative effects of the COVID-19 pandemic were disproportionately high for persons with disabilities](#). In transport, [one of the services that was suspended once lockdown was imposed in France and Belgium, was assistance to rail passengers with disabilities](#). This was a clear violation of [EU law](#) and further limited the equal right to travel for persons with disabilities, who already encounter numerous accessibility and assistance-related barriers.

One of the main shortcomings of the initiative is its reactive nature. As noted in the Roadmap "the plan aims to establish a "crisis manual" that will include relevant actions to mitigate any negative impact on the transport sector, passengers and the internal market ***in the event of a crisis.***" We think that in order to effectively prevent severe negative consequences of another crisis, it is important to have a more preventive approach. For example, as noted above, due to 'social distancing' measures, assistance for rail passengers with disabilities were suspended in Belgium and France. However, if the infrastructure and rolling stock were accessible for persons with disabilities, most would be able to travel independently without the need of close contact with assistance personnel. **Investing in accessible transport infrastructure and services is therefore a crucial measure for crisis preparedness.**



Below are some recommendations in reaction to the roadmap consultation, which are in line and build on our [2020 Recommendations on exit measures for transport services in light of COVID-19](#).

Recommendations:

- The contingency plan should highlight that crisis measures or regulatory relief on transport services should not come at the cost of unequal rights of passengers with disabilities. In particular, persons requiring assistance for travelling should be able to exercise this right in a safe and dignified manner, as ensured by EU passenger rights legislation.
- EU and Member States should improve accessibility of transport infrastructure and services, so that persons with disabilities are able to travel spontaneously and independently as other travellers. Not relying on assistance would also ensure protection of health of passengers and transport staff in case of a similar health crisis as COVID-19, as more passengers would be able to travel without the need of close physical contact with assistance personnel.
- EU and Member States should allocate funding specifically for improving accessibility of existing transport infrastructure and services; and all funding for new transport projects or procurement should be subject to ensuring accessibility for all passengers.
- Crisis handling protocols and procedures should be accessible for everyone.
- All relevant policies and measures, including crisis protocols and emergency plans, should be drawn up in close cooperation with organisations of persons with disabilities (DPOs).
- All staff, working for and around transport services (e.g. ticket officers but also staff working in airport/station shops), but especially those providing assistance to passengers with disabilities, should be trained regularly on providing assistance and other services in a safe way during times of health and other emergencies.

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