



# EDF recommendations for the dialogues on the enforcement of Passenger Rights

30 October 2025

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In 2023 the European Commission (EC) published a legislative proposal to improve the enforcement of passenger rights in all transport modes<sup>1</sup>. Both the European Parliament (EP) and the Council have adopted their positions. This document contains our recommendations for the dialogue negotiations, building on EDF [position paper](#) and [proposal for amendments](#).

## Regulation 1107/2006

- **Free of charge ticket for the accompanying person (EP and EC)<sup>2</sup>.**

EDF fully supports the provision of an accompanying person travelling free of charge when required by the air carrier for safety reasons, as requested by the Parliament and the Commission. This provision already exists in other EU passenger rights regulations and in the [United States' Air Carrier Access Act](#).

We oppose the Council proposal which would require the passenger to still bear part of the cost (i.e taxes and others). Even if the accompanying person is exempted from the air fare, the remaining costs are still high. For example, if a flight from BCN to BXL costs 268 EUR, 113 EUR are taxes and charges.

In its position, the Council proposes that the passenger can change the name of the accompanying person without any charge and up to 48h before the STD<sup>3</sup>. While the intention is positive, this only applies to the cases in which the passengers are required by the carrier to travel accompanied for safety reasons. To make sure the measure has a real impact on the disability community, this should be also a possibility for passengers who already travel with a personal assistant (PA)<sup>4</sup>.

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<sup>1</sup> Proposal for a Regulation of the European Parliament and of the Council amending Regulations (EC) No 261/2004, (EC) No 1107/2006, (EU) No 1177/2010, (EU) No 181/2011 and (EU) 2021/782 as regards enforcement of passenger rights in the Union.

<sup>2</sup> Article 2 (1), line 93 of three column document

<sup>3</sup> Article 2 (1), line 83a of the three-column document.

<sup>4</sup> Flights are often booked in advance and PA can change last minute for different reasons.

- **Full compensation for mishandled mobility equipment, assistive devices and assistance dogs (EP and Council)<sup>5</sup>.**

EDF welcomes the fact that both institutions address the limited liability for mishandled mobility equipment, which is one of the biggest barriers for passengers with disabilities. While both proposals are good, the Council text should be improved so that the declaration of special interest is clearly offered 'free of charge' (not without 'an additional fee' as the current wording suggests) and the liability also applies to assistive devices (as the EP wording suggests).

- **Service Quality Standards in air transport (EP and CE) <sup>6</sup>**

EDF supports the introduction of service quality standards for air carriers and, as proposed by the EP, its extension to airports. This measure should help address the lack of data on the type of assistance provided to PRM as well as the total number and nature of PRM related of complaints. This measure, [which already exists in the United States](#), would provide an accurate picture of the situation in passenger rights, help consumers choose the carriers and airports that offer better service and encourage them to improve their performance.

## **Regulation 261/2004**

- **Compensation for delay or lack of assistance (EP)<sup>7</sup>:**

EDF fully supports the proposal to grant passengers with disabilities and people accompanying them the right to compensation, reimbursement and re-routing when they miss their flight due to lack of airport assistance. Current rules do not provide passengers with disabilities with any compensation when their rights are not respected.

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<sup>5</sup> For the parliament, see Article 12, line 98c on three column document. For the Council, [see 2025 general approach](#), Article 6 of Regulation (EC) No 2027/97

<sup>6</sup> Proposed Article 2 and line 96, 97 and 98a.

<sup>7</sup> Proposed Article 11, line 50h of three column document

## Recitals

- **Assistance dogs (EP)<sup>8</sup>:**

EDF fully supports the EP proposal for the Commission to assess the situation in each Member State and act, including through legislation, to ensure that assistance dogs are mutually recognised throughout the EU. We support that the assistance dog, once accepted by the airline, is recognized for the entire journey. This is aligned with [EDF's position paper on assistance dogs](#) and [our demands for the second part of the EU Strategy on the rights of persons with disabilities](#).

- **Safety and disability in air travel (EP)<sup>9</sup>:**

EDF supports the need to study current rules and identify inconsistencies in the air transport of people with disabilities. **However, we have strong reservations on the request to uniform the safety criteria and align it globally with ICAO.** The traditional focus of the sector on safety over accessibility and existing misconceptions about disability risk harmonizing more restrictive practices, especially if persons with disabilities and accessibility experts are not involved in a meaningful manner.

## Other considerations:

- **Accessibility**

EDF supports the proposals throughout the text that refer to the **European Accessibility Act** (Directive 882/2019) and the provisions aimed at making information and complaint processes more accessible to persons with disabilities.

- **Service Quality Standards in rail transport (EP)<sup>10</sup>**

EDF supports the introduction of service quality standards to rail transport operators and infrastructure managers. While article 29 of Regulation 2021/782 already obliges rail undertakings and station managers to monitor and, where appropriate, publish a report on compliance with quality standards, this is based on existing Annex III. In its

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<sup>8</sup> Proposed Recital 17a, line 30a of the three-column document.

<sup>9</sup> Proposed Recital 17b, line 30b of the three-column document.

<sup>10</sup> Proposed Annex VI, lines 402a, 402b, 402c

current form, such Annex only provides a general obligation to report on assistance provided to persons with disabilities and persons with reduced mobility and discussions with representative organisations. There is no obligation to report on specific issues, including cases of denied boarding, damaged or lost mobility equipment or imposition of an accompanying person.

- **Annexes on Service Quality Standards (EP and CE)**

EDF fully supports the EP proposal to include the cases where assistance was not provided or provided with delay in the Service Quality Standards (Annex II, III, IV and IVa) for all transport modes. Assistance is one of the key passenger rights and one of the main reasons behind PRM complaints.

- **Consumer rights**

Passengers with disabilities are also consumers and [EDF also supports BEUC's recommendations on Regulation 261/2004](#) including on compensation, hand luggage, extraordinary circumstances and enforcement, to name a few.

## **Related documents**

[EDF Analysis of the Proposal for a Regulation on the Enforcement of Passenger Rights](#) (February 2024)

[EDF amendments of the Proposal for a Regulation on the Enforcement of Passenger rights](#) (February 2025).

## **Contact persons at the EDF secretariat**

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