



Airport Accessibility Compliance Report 2023

KERRY AIRPORT







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1. Executive Summary

The IAA is the single civil aviation regulator for Ireland. We are responsible for the regulation of safety, security and consumer interests. The Irish Aviation Authority (IAA) is the National Enforcement Body in Ireland for *Regulation (EC) No. 1107/2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air* (hereafter referred to as ‘the Regulation’). The IAA investigates complaints and conducts inspections of airports situated in Ireland in order to ensure compliance with the Regulation. The purpose of the Regulation is to enable persons with reduced mobility (PRM) and persons with disabilities to have equal opportunities for air travel comparable to those of persons without reduced mobility or a disability. In line with the IAA’s responsibilities as the National Enforcement Body for the Regulation, the IAA conducted an inspection of Kerry Airport to ensure compliance with the obligations set out therein. The information gathered pre-inspection pertains to statistics on Persons with Reduced Mobility (PRMs),¹ as well as training information and the type and quantity of mobility equipment.

As Table 1 indicates, Kerry Airport had a total of 3,322 PRMs travel in 2023. This is 0.80% of the total passenger numbers. It is important to note that Kerry Airport only counts outbound PRMs towards their annual number. The IAA found areas in need of improvement in Kerry Airport in order to improve the experience for PRMs. The findings are discussed later in the report.

Table 1: 2023 All Passenger and PRM numbers from all Irish Airports²

Airport	Total Passenger	Total PRM	PRM % of Total Pax
Dublin	33,262,941	391,719	1.18%
Cork	2,798,024	26,619	0.95%
Shannon	1,897,599	22,045	1.16%
Ireland West	813,266	12,602	1.55%
Kerry	414,571	3,322	0.80%
Donegal	19,230	382	1.99%

2. Overview

2.1. Definition of Person with Reduced Mobility and Disabled Person

The definition of ‘disabled person’ or ‘person with reduced mobility’ is taken directly from (EC) 1107/2006 Article 2(a):

¹ This report will use the acronym ‘PRM’ to refer to both persons with reduced mobility and persons with disabilities in line with industry practises.

² Passenger numbers refer to commercial passengers only. The passenger numbers are all available from the Central Statistic Office. Donegal Airport passenger number is from the airport, not the CSO. Further information can be downloaded from the CSO here:

https://ws.cso.ie/public/api.restful/PxStat.Data.Cube_API.ReadDataset/TAM08/XLSX/2007/en. The PRM numbers are provided by the airports themselves.



“Any person whose mobility when using transport is reduced due to any physical disability (sensory or locomotor, permanent or temporary), intellectual disability or impairment, or any other cause of disability, or age, and whose situation needs appropriate attention and the adaptation to his or her particular needs of the service made available to all passengers.”³

It is important to note that there is no distinction between short-term/long-term or, as used in the above definition, “permanent/temporary” for the purposes of having reduced mobility or a disability. There has also been an international movement to recognise those with hidden disabilities and how these passengers can experience barriers to air travel. Persons with disabilities (hidden or otherwise) or with reduced mobility can request the assistance set out in the Regulation without having to disclose their disability or reason for reduced mobility.

2.2. Purpose of the Report

The purpose of this report is to provide a comprehensive overview of the accessibility of Kerry Airport within the scope of IAA’s enforcement remit of Regulation (EC) 1107/2006. The report addresses Kerry Airport’s compliance with the obligations prespecified in the Regulation and determines, from the physical inspection, complaints submitted to the IAA, and the pre-inspection questionnaire whether the airport has met its obligations. The report’s sections will briefly summarise the relevant Article and the airport’s compliance, as well as the IAA’s commentary from the inspection. The IAA has issued findings and recommendations with timeframes for the implementation of any necessary changes to comply with the Regulation. The report will also highlight positive innovations undertaken by the airport and upgrades since the previous inspection. Finally, the report will provide General Comments and Summary Findings.

2.3. Airport Inspection

The airport inspection follows the format provided for in Annex I of Regulation (EC) 1107/2006. Annex I outlines the “assistance under the responsibility of the managing bodies of airports.”, the inspection starts at the outside boundary where it is expected a passenger would enter the airport, i.e. from the car park or from the ‘drop off zone’ at the front doors. The inspection encompasses the PRM experience, up to the point of embarking on the aircraft.

2.4. Inspection Methodology

2.4.1. Notice of Inspection

The IAA will issue a Notice of Inspection to the airport which will include a proposal for times and dates for the inspection. The Notice of Inspection also briefly outlines the role of the IAA as the National Enforcement Body charged with ensuring compliance with Regulation (EC) 1107/2006.

2.4.2. Preliminary Questionnaire

The Notice of Inspection also includes a preliminary questionnaire in advance of the inspection. The airports have 20 business days to submit a response to the questionnaire.

³ Regulation (EC) 1107/2006 Article 2.



2.4.3. Post Inspection & Report Publication

After the physical inspection has been conducted, the IAA creates a report outlining the IAA's findings and airport's compliance with the Regulation. The IAA liaises with the airport regarding the deadlines for implementation of the recommendations made. These timeframes are outlined in the published report.

3. Inspection Findings (2023)

On the 21 November 2023, the Irish Aviation Authority conducted an inspection of Kerry Airport to assess the airport's compliance with Regulation (EC) 1107/2006. The following sections analyse the airport's compliance with each article of the Regulation. Each section will outline the article, the obligations deriving from the Regulation, and the IAA's findings.

3.1. Article 5: Designation of Points of Arrival and Departure

“The managing body of an airport shall, taking account of local conditions, designate points of arrival and departure within the airport boundary or at a point under the direct control of the managing body, both inside and outside terminal buildings, at which disabled persons or persons with reduced mobility can, with ease, announce their arrival at the airport and request assistance.”⁴

The points of arrival and departure shall be clearly signed and shall offer “basic information about the airport, in accessible formats.” The ability for a PRM to announce their arrival upon entering the airport boundary is an important and sometimes critical beginning to their air travel. Accordingly, this article addresses two significant aspects of the airport's compliance: call points and signage. Kerry Airport is a singular level space with no changes in levels. As mentioned in the 2022 report, the entry barrier to the car park has a bell which passengers ring should they require any assistance from their car to the terminal building. Additionally, there is a phone number provided on the website should the passengers wish to call to request assistance from their car. The general drop off and pick up zone (bus, cars and taxis) is located in close proximity to the terminal entrances for both arrivals and departures.

⁴ Regulation (EC) 1107/2006 Article 5(1).



Figure 1 Disabled Parking Sign with International Symbol of Access in Blue and White



Figure 2 Bus stop outside the terminal building with a sign directing PRMs who require assistance

Additionally, the signage throughout the airport is relatively uniform. Some signs are located above structures which results in them not being visible to the passenger. Example seen in Figure 3.



Figure 3 International Symbol of Access in Black and Silver for Above Tourist Information

There is lack of signage directing users towards the accessible bathroom in the seating area, airside. While there is an abundance of PRM designated seating, the accessible bathroom is located down a hallway with no signage to indicate its location. As this terminal also boasts a bar, it is recommended that the airport install clear signage to the bathroom's location. This is to ensure that even on a busy day, a passenger can still access the facilities. The bar staff should also be mindful that this could obstruct access to the bathroom, especially for wheelchair users.

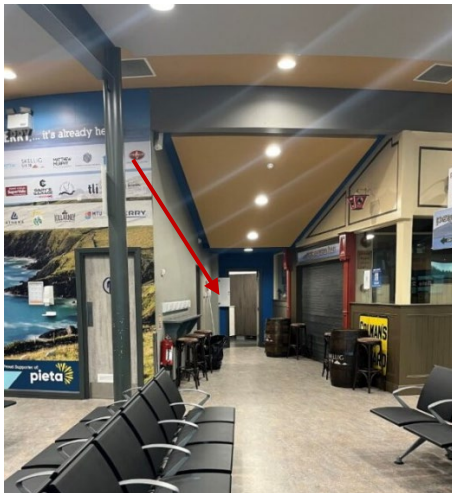


Figure 4 Accessible Bathroom in Gate Area

3.1.1. Article 5 Findings:

Signage

The airport should place signage indicating the location of the accessible bathroom in the gate area.

Since the inspection, Kerry Airport has completed this recommendation and implemented a sign in the gate area.

3.2. Article 6: Transmission of Information

“When an air carrier or its agents or a tour operator receives a notification of the need for assistance at least 48 hours before the published departure time for the flight, it shall transmit the information concerned at least 36 hours before the published departure time for the flight [to the managing bodies of the airports of departure, arrival and transit.]”⁵

This article also states that *“as soon as possible after the departure of the flight, an operating air carrier shall inform the managing body of the airport of destination, if situated in the territory of a Member State to which the Treaty applies, of the number of disabled persons and persons with reduced mobility on that flight requiring assistance specified in Annex I and of the nature of that assistance.”*⁶

⁵ Regulation (EC) 1107/2006 Article 6(2).

⁶ Regulation (EC) 1107/2006 Article 6(4).

Kerry Airport informed the IAA that as Ryanair provide all the passenger flights operating in and out of the airport, all requests for assistance are provided through the Ryanair's internal OMS Movement Control System. The airport confirmed that it does not regularly have non-notified passengers as most passengers travelling through the airport require assistance on the arrival side of their journey, not outbound from Kerry Airport. As it is the airline's obligation to notify both airports of the need for assistance, it is more convenient for the passenger to notify through the airline than directly with the airport. However, the airport will still endeavour to assist passengers who did not pre-notify. The airport confirmed that it has not experienced any issues with this method.

3.3. Article 7: Right to Assistance at the Airport

“When a disabled person or person with reduced mobility arrives at an airport for travel by air, the managing body of the airport shall be responsible for ensuring the provision of the assistance specified in Annex I in such a way that the person is able to take the flight for which he or she holds a reservation, provided that the notification of the person's particular needs for such assistance has been made to the air carrier or its agent or the tour operator concerned at least 48 hours before the published time of departure of the flight.”⁷

Kerry Airport confirmed that all passengers who require assistance in the airport receive that assistance. The airport has target assistance times built into their Quality Standards, and the airport confirmed no issues with meeting these targets. This is due to the resourcing operations of the airport which will be discussed in a later section. The targets mentioned in their Quality Standards are those set out in the [ECAC Code of Good Conduct in Ground Handling for Persons with Reduced Mobility 2003](#).

The ECAC Code of Good Conduct in Ground Handling for Persons with Reduced Mobility 2003 standards are as follows:

FOR PRE-BOOKED DEPARTING CUSTOMERS

Upon arrival at the airport, once they have made themselves known:

- 80% of customers should wait no longer than 10 minutes for assistance
- 90% should wait for no longer than 20 minutes
- 100% should wait for no longer than 30 minutes

FOR NON PRE-BOOKED DEPARTING CUSTOMERS

Upon arrival at the airport, once they have made themselves known:

- 80% of customers should wait no longer than 25 minutes
- 90% should wait no longer than 35 minutes
- 100% should wait no longer than 45 minutes

⁷ Regulation (EC) 1107/2006 Article 7(1).

3.4. Article 8: Responsibility for Assistance

“The managing body of an airport shall be responsible for ensuring the provision of the assistance specified in Annex I without additional charge to disabled persons and persons with reduced mobility.”⁸

This obligation lies with the airport managing body, but a contract can be established with one or more parties for the supply of the assistance.

Article 8(3) states that:

“...the managing body of an airport may, on a non-discriminatory basis, levy a specific charge on airport users for the purpose of funding this assistance.”⁹

Kerry Airport provides the assistance in line with obligations set down in the Regulation. All airport staff are trained in disability-awareness training and to provide assistance to the gate. Any passengers who require assistance to the aircraft or their cabin seat, the assistance is provided by ground handlers. The airlines are not charged for the assistance.

3.5. Article 9: Quality Standards

“The managing body shall set Quality Standards for the assistance specified in Annex I, unless the airport’s annual traffic is less than 150 000 commercial passenger movements.”¹⁰

Kerry Airport has developed the necessary [Quality Standards](#) which are available on their website to passengers. The Quality Standards refers to the ECAC Ground Handling Code of Conduct for persons with reduced mobility and disabilities and the customer service levels laid out therein. See Section 2.3 for further details.

3.6. Article 11 Training

“Air carriers and airport managing bodies shall:

(a) ensure that all their personnel, including those employed by any sub-contractor, providing direct assistance to disabled persons and persons with reduced mobility have knowledge of how to meet the needs of persons having various disabilities or mobility impairments;

(b) provide disability-equality and disability-awareness training to all their personnel working at the airport who deal directly with the travelling public;

(c) ensure that, upon recruitment, all new employees attend disability-related training and that personnel receive refresher training courses when appropriate”¹¹

Kerry Airport confirmed that it has provided disability-awareness training to all customer-facing staff. This training is provided through Ryanair’s PRM training courses. The airport advised that if an updated training procedure is released by Ryanair, the airport organises training as appropriate to

⁸ Regulation (EC) 1107/2006 Article 8(1).

⁹ Regulation (EC) 1107/2006 Article 8(3).

¹⁰ Regulation (EC) 1107/2006 Article 9.

¹¹ Regulation (EC) 1107/2006 Article 11.



implement any amendments. The airport also confirmed that the ground handlers receive manual handling training in order to provide WCHC (assistance through the airport and to the cabin seat on the aircraft) assistance should the passenger require it. The ground handling manager advised the IAA that refresher courses are provided as needed (for example, a worker being out of work for over 6 months or if there's a change to existing policy/procedure.)

3.7. Article 12: Compensation for Lost or Damaged Wheelchairs, Other Mobility Equipment and Assistance Devices:

“Where wheelchairs or other mobility equipment or assistive devices are lost or damaged whilst being handled at the airport transported on board aircraft, the passenger to whom the equipment belongs shall be compensated, in accordance with rules of international, Community and national law.”¹²

If a mobility aid or a piece of mobility equipment is damaged, there should be high priority in repairing same.¹³ The airport confirmed that if mobility equipment was damaged, the airport would create a ‘Damage Report’ which would then be passed to Ryanair as the sole (commercial) air carrier operating out of Kerry Airport. Ryanair would then liaise with the passenger to organise repair of the equipment.

3.8. Article 15: Complaint Procedure

“A disabled person or person with reduced mobility who considers that this Regulation has been infringed may bring the matter to the attention of the managing body of the airport or to the attention of the air carrier concerned, as the case may be.

If the disabled person or person with reduced mobility cannot obtain satisfaction in such way, complaints may be made to any body or bodies designated under Article 14(1), or to any other competent body designated by a Member State, about an alleged infringement of this Regulation.”¹⁴

Complaints ensure that the airport is proactively ensuring compliance with the standards laid down by the Regulation and responding to passenger feedback. The complaint mechanism should be easily accessible to the passengers and each complaint should be investigated and replied to by the party concerned. Kerry Airport confirmed that it can receive complaints by phone, email or post and the information for same is available on their website. The airport also confirmed that it has not received any complaints regarding the PRM assistance.

Since the inspection, the Irish Aviation Authority confirms that there are no ongoing or submitted complaints relating to Kerry Airport.

¹² Regulation (EC) 1107/2006 Article 12.

¹³ In the context of the Regulation, compensation means a refund for repairs of damaged mobility equipment or payment towards new mobility equipment due to the original being lost. This is done in accordance with international, European Community and national law.

¹⁴ Regulation (EC) 1107/2006 Article 15(1) and 15(2) respectively.

4. General Comments

Kerry Airport is in close proximity to a train station and is also served by buses. It has two car parks: a short term and a long term. There is an agreement in place which allows for self-transfers departing from Kerry Airport and arriving in Dublin Airport to continue through to their departure gates without having to go through additional security if the passenger has carryon luggage only. The terminal building is small and on a single level, making for an easier journey for someone with reduced mobility or disability. There are eight accessible parking spaces available for passengers, which are also located in close proximity to the terminal doors.

The airport has regular PRM users which enables staff to become familiar with users of the service and the assistance they require. PRMs receive assistance by all customer service staff embarking or disembarking the aircraft. If a PRM requires assistance for beyond this point i.e., WCHC (assistance through the airport and to the cabin seat on the aircraft) and WCHS (assistance through the airport and up the stairs of the aircraft) this assistance is provided by the ground handlers. Kerry Airport purchased two Aviramp as there are no air bridges in the airport for embarking and disembarking the aircraft. Aviramps are structures that provide a ramp from the ground up to the door of the aircraft. See Figure 5 below.



Figure 5 Aviramp

The gate area is a general seating area for two gates. This area also has a Food and Beverage outlet for passengers. While there is plenty of seats designated for PRMs, there did not appear to be signage for the seats or the accessible bathroom in this area. If the terminal were to become crowded, PRMs could potentially get confused as to where the bathrooms are. The area could also become difficult for wheelchair users to manoeuvre through. Additionally, while there is signage indicating PRM services, they are inconsistent in colour and could also have more prominent placing.

The airport must also be satisfied that all seasonal staff have received the appropriate training as outlined in Article 11 of the regulation.

5. Summary Findings

The airport provides the assistance itself as per Article 8 of the Regulation. All customer service staff are trained to provide this assistance. The airport also confirmed that they do not regularly have non-notified passengers travelling through the airport which aids in in predictability of PRM numbers. Kerry Airport has satisfied Article 6, Article 7 and Article 8 of the regulation. As referred to in Section 5.1, Article 5 requires some attention. This is due to the lack of signage in some areas of the airport. While the airport is mostly compliant with this article of the regulation, improvement is needed. All training procedures discussed during the inspection meet the obligations laid down by the Regulation. The airport has a complaints procedure should a person with reduced mobility or a person with disability wish to complain about the assistance service

Kerry Airport is a singular level building which allows for ease of movement between check in area, security, and gate area. The airport noted that staff can often recognise regular PRM users and provide a more “tailored” assistance experience for them. The airport has considered and implemented its obligations under Regulation (EC) 1107/2006 and has also taken the European Civil Aviation Conference Doc 30 Part I into account through its Quality Standards including the ECAC Code of Conduct in their Quality Standards.¹⁵ It is the opinion of the Irish Aviation Authority that the basic principles of the Regulation are clearly evidenced in the accessible nature of this regional airport.

¹⁵ European Civil Aviation Conference Doc 30 Part I 13th Edition (2023).