



Airport Accessibility Compliance Report 2024

KERRY AIRPORT



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1. Executive Summary

The IAA is the single civil aviation regulator for Ireland who is 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. This information helps to inform the IAA as to the quality of operation for PRM assistance services at each airport. Kerry Airport was inspected on 30 April 2024 for its compliance with the Regulation. Kerry Airport advised the IAA prior to the 2024 inspection that it had implemented all of the IAA’s findings from the previous year. The airport provided all answers to the questionnaire prior to the inspection and assisted the IAA on the day of inspection, all obligations under the Regulation were inspected on the day. The airport’s annual passenger number is over 150,000 which requires the airport to develop Quality Standards. Kerry Airport has published their Quality Standards on their website. The airport has implemented all of the IAA’s findings which were observed during the 2024 inspection. Table 1 indicates, Kerry Airport had a total of 3,371 PRMs travel in 2024 which was 0.81% of the total passenger number.

Table 1: All Passenger and PRM numbers from all Irish Airports from 2024

Airport	Total Passenger ²	Total PRM	PRM % of Total Pax
Dublin Airport	34,645,117	446,348	1.29%
Cork Airport	3,070,511	33,682	1.10%
Shannon Airport	2,104,361	26,270	1.25%
Ireland West Airport	833,860	14,458	1.73%
Kerry Airport	417,409	3,371	0.81%
Donegal Airport	24,593 ³	372	1.51%

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 The PRM number is provided by the airport, and the total passenger number is collected from the Central Statistics Office. Donegal Airport passenger number is from the airport, not the CSO. Donegal Airport only counts outbound PRMs and thus only outbound general passengers are included in ‘Total Passenger’. Further information can be found here: <https://www.cso.ie/en/statistics/transport/aviationstatistics/>. The PRM numbers are provided by the airports themselves to the IAA as the PRM number is not counted by the CSO.

³ Donegal Airport total passenger number is for outbound only.

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):

“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.”⁴

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. The definition of Persons with Reduced Mobility is extended to include those with hidden disabilities. 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 a summary table of findings and General Comments.

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.

⁴ Regulation (EC) 1107/2006 Article 2.

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.

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 findings made. These timeframes are outlined in the published report.

3. Inspection Findings (2024)

On the 30 April 2024, the IAA 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 and the obligations deriving from the Regulation.

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."*⁵

Kerry Airport has one main entrance and arrival point which passengers taking the bus, taxi, or private car all utilise. The barrier to the car park also has an assistance call point which passengers can use should they require assistance from the car park into the airport building. The IAA rang this call point on the day and it was answered within several rings. The accessible parking spaces are signposted in the car park. There are eight accessible parking spaces in total for passengers. The airport confirmed that the rate charged for these spaces is the long-term parking rate.



Figure 3: Entrance to Kerry Airport for all passengers



Figure 2: Car Park Sign with International Symbol of Access



Figure 1: PRM services sign on entrance door

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

Arriving at Kerry Airport from the car park, there is a sign on the bus shelter advising passengers to go to the information desk inside the airport building should they require assistance. The airport confirmed assisting passengers from the car park is not regular occurrence. However, staff are available should the need arise. Passengers can also advise the airport of this need when they are pre-notifying the airport of their PRM assistance using the airport's general phone line



Figure 4: Bus stop with PRM services sign

As Kerry Airport's check in, security area, and 'arrivals' are situated in the same open plan space This large area also has an accessible toilet. The toilet was seen to be in clean and good working order on the day of the inspection.



Figure 5: Sign for accessible toilet at check in and arrivals area

Article 5(2): *“The points of arrival and departure referred to in paragraph 1, shall be clearly signed and shall offer basic information about the airport, in accessible formats.”*⁶

Following the 2023 inspection, the IAA recommended Kerry Airport address the lack of signage in the gate area after security. The airport fully implemented this finding and have now included signage indicating where the accessible toilet is located in the gate area.

⁶ Regulation (EC) 1107/2006 Article 5.



Figure 9: New sign showing accessible toilet location at gate area

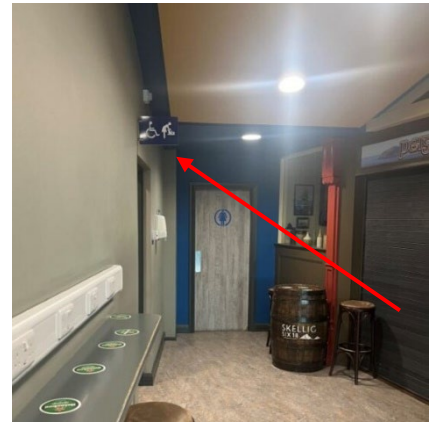


Figure 6: Accessible toilet beside bar



Figure 8: New sign showing accessible toilet location in gate area



Figure 7: Close up of accessible toilet sign

3.1.1. Article 5 Findings:

Signage

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

Since the inspection, Kerry Airport has completed this finding 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.]”⁷

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.”*⁸

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.”*⁹

The airport confirmed it receives assistance requests directly from the Ryanair’s operator system or from the airline directly. Additionally, PRMs can also go to the Information Desk at Kerry Airport and the airport staff will then arrange assistance for the journey. The Regulation states that passengers must request assistance within 48 hours of departure to be considered ‘pre-notified’ and the airline is obliged to forward the request for assistance from the passenger to the airport at least 36 hours before departure. Kerry Airport advised that many locals are known to the airport as regular travellers, which include PRMs. The airport can also receive calls regarding assistance for passengers.

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

⁷ Regulation (EC) 1107/2006 Article 6(2).

⁸ Regulation (EC) 1107/2006 Article 6(4).

⁹ Regulation (EC) 1107/2006 Article 6(4).

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.”¹⁰

Kerry Airport confirmed to the IAA that they are able to provide the required assistance to passengers with reduced mobility or persons with disabilities. All customer service staff are trained to provide assistance and there are a number of ground handling staff who take over the assistance services from the ramp (the area outside the terminal building on airside) to embarking on the aircraft. This assistance includes assisting passengers up the Aviramp and to their seat should it be required. This type of assistance is known by the Special Service Request (SSR) code WCHC.¹¹



Figure 10: Aviramp - ramp used for accessing aircraft

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.”¹²

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.”¹³

The PRM assistance is provided by customer service personnel and ground handlers at Kerry Airport. Ground handlers provide the assistance which requires manual handling such as transferring

¹⁰ Regulation (EC) 1107/2006 Article 7(1).

¹¹ The International Air Transport Association explains ‘WCHC’ as meaning “passenger completely immobile; requires wheelchair to/from aircraft/mobile lounge and must be carried up/down steps and to/from cabin seat.”

¹² Regulation (EC) 1107/2006 Article 8(1).

¹³ Regulation (EC) 1107/2006 Article 8(3).

passengers from an aisle chair to their cabin seat. No charge is levied for the provision of the PRM service at Kerry Airport.

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.”¹⁴

Kerry Airport published its [Quality Standards on the website](#). The latest review of the standards was conducted on 15 March 2024. This was to ensure passengers who felt they needed to submit a complaint regarding the PRM services in Kerry Airport had the information to do so. The IAA can confirm that the information provided in the airport’s Quality Standards is accurate and provides current information to passengers.

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”¹⁵

The training for staff at Kerry Airport is provided through Ryanair’s training platform. The training for each employee can be tailored depending on their role within the airport and the training records are located on an automated system. Almost all staff have a level of disability awareness and disability equality training, depending on the level of interaction with passengers. Staff that interact directly with passengers through customer service and PRM assistance all have the necessary training in disability awareness and disability equality. The training is provided proportionally to the individual’s role in PRM services and refresher training is provided every two years. The system is automated to alert the staff when a training requires an update or refresher.

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.”¹⁶

¹⁴ Regulation (EC) 1107/2006 Article 9.

¹⁵ Regulation (EC) 1107/2006 Article 11.

¹⁶ Regulation (EC) 1107/2006 Article 12.

The airport confirmed that it would provide a temporary replacement wheelchair if a passengers' wheelchair was lost or damaged. It is important to note that the temporary replacement of mobility equipment may not be on a like for like basis, which is outlined in Annex I of the Regulation. A report would be created for the item and then passed onto Ryanair (only airline operating out of the airport at present). If necessary, a report would be filed with [WorldTracer](#) which is an online system for recovering lost baggage. This system is a global tracing system which is used to find items in airports or with airlines. If a passengers mobility equipment is lost or damaged by ana airline or airport, they can receive "compensation" to repair or replace the item. The term "compensation" in this article refers to reimbursement for repairs to mobility equipment or fully replacing the damaged equipment. This is in accordance with maximum amounts of compensation as stated by international, Community and national law.¹⁷



Figure 11: Row of wheelchairs in airport for PRMs

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."*¹⁸

The airport confirmed that it receives complaints via phone, email, letter, or in person. Information on how to submit a complaint to Kerry Airport is available on [the website](#) under 'Complaints'.

The IAA can confirm that, at the time of the publication of this report, it has not received any complaints in relation to the PRM assistance provided at Kerry Airport. Additionally, the airport confirmed that it has not received any complaints relating to the PRM services in 2024.

¹⁷ The Montreal Convention governs the loss or damage of mobility equipment at the international level. Article 22 outlines the amount a passenger is entitled to for their lost or damaged mobility equipment which is currently approximately €1,272.00.

¹⁸ Regulation (EC) 1107/2006 Article 15(1) and 15(2) respectively.

4. Summary Findings

Finding	Article (Regulation EC 1107/2006)	Corrective Action Plan	Timeline
Signage for accessible toilet	Article 5	Install signage for accessible toilet	Completed

Table 2 Table of Findings

5. General Comments

Kerry Airport has many services available for PRM passengers and has satisfied its obligations under the Regulation. The IAA issued its findings in 2023 for the corresponding 2023 inspection, and all corrective action plans have been completed satisfactorily. The airport currently uses wheelchairs, aisle chairs (for on the aircraft) and Avriamps to provide assistance to passengers. The Aviramp is a 'Z' shaped ramp that allows a passenger to access the doors of the aircraft with a mobility aid if needed without having to climb any stairs (see Figure). Accordingly, using the Aviramp, a wheelchair can be pushed up to the doors of the aircraft. If a passenger requests the assistance recognised as the 'WCHC' Special Service Request code (requiring assistance all the way to the cabin seat), the passenger would be transferred to the aisle wheelchair at the doors of the aircraft and then brought to their seats.

Some airports have developed their own identifier for hidden disabilities or alternatively, airports have chosen to recognise the Hidden Disabilities Sunflower. Other emblem/identifiers are available both in Ireland and internationally, however, the IAA has found that the Hidden Disability Sunflower appears to be the most used and recognised throughout airports in Ireland. Indeed, Kerry Airport recognises the Hidden Disability Sunflower.

The mobility equipment in Kerry airport was seen to be in good working order and the airport confirmed that the equipment is subject to periodic visual inspection and periodic servicing.

6. Conclusion

Kerry Airport caters to persons with reduced mobility and persons with disabilities and provides the services as outlined by Regulation (EC) 1107/2006. All website information is now up to date and provides accurate information to the public regarding their rights under the Regulation, including the ability to submit a complaint to the IAA if necessary. The airport has improved its signage in the Gate area as recommended by the IAA in the 2023 Airport Accessibility Compliance Report and to the airport will update further signage throughout the airport.

The IAA will continue to monitor the airport's improvements for PRM passengers in 2025.

