



Airport Accessibility Compliance Report 2024

Shannon Airport



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1. Executive Summary

The IAA is the single civil aviation regulator for Ireland which 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 Shannon 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.

The information gathered pre-inspection pertains to the airport’s complaints procedure, training of staff regarding knowledge of disabilities and Persons with Reduced Mobility (PRMs), and the quantity/type of mobility equipment. Shannon Airport was inspected in June 2024 for its compliance with the Regulation. Shannon implemented the IAA’s finding from the 2023 inspection. The airport provided all answers to the questionnaire prior to the inspection and assisted the IAA on the day, ensuring all airport-related elements of the Regulation were reviewed for compliance. The airport’s annual passenger number is over 150,000 which requires the airport to develop Quality Standards. The Quality Standards and are published under the ‘Age Friendly Airport’ section of the airport’s website. Shannon Airport provides information pertaining to the PRM assistance on their website, covering various issues such as wheelchair rental, website accessibility, security and travelling with Autism.

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	3371	0.81%
Donegal Airport	24,593	372	1.51%

Table 1 All Passenger and PRM Numbers from all Irish airports 2024

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 as this statistic is not counted by the CSO.

2. Overview

2.1. Definition of Person with Reduced Mobility and Person with Disabilities

The definition of 'disabled person' or 'person with reduced mobility' is stated in Regulation (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."*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. 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 Shannon Airport within the scope of IAA's enforcement remit of Regulation (EC) 1107/2006. The report addresses Shannon 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 with these articles in the Regulation, as well as the IAA's commentary from the inspection. The IAA has issued findings 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, a Summary Findings table and a Conclusion.

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.

³ Regulation (EC) 1107/2006 Article 2.

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 includes a preliminary questionnaire to be completed 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 26 June 2024, the IAA conducted an inspection of Shannon 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

Shannon Airport has a bus and taxi drop off zone located outside the front doors of the main airport building. There is a covered pedestrian tunnel which is situated between the car park and the main airport building. The first PRM call point is located in this pedestrian tunnel. See Figure 3. This call point was in good working order on the day of the inspection and has seating located beside the call point should a passenger require it while waiting for assistance. If passengers are arriving by car, there are two car parks located a short distance from the airport building's entrance, both with multiple accessible carparking spaces. The airport confirmed that the carpark located to the left-hand side of the main entrance does not currently have a call point in, however, there is a plan to have one installed. The airport also has additional 'Age-Friendly' carparking spaces. The airport confirmed that there are call points on the gate barriers on entering the car parks. While they are not reserved for

⁴ Regulation (EC) 1107/2006 Article 5.

PRMs, if a passenger requests assistance driving up to the barrier, the airport stated that the request would be passed on to the appropriate team. This may be assistance to reach the PRM desk in the airport.

The airport's drop-off zone has two areas reserved for persons with reduced mobility or disabilities. See Figure 2. Once a PRM has presented themselves to the PRM desk, they can begin their journey through the airport with the provided assistance. On this basis, the airport has fewer call points on the airside portion of the building.



Figure 3: PRM Call Point located in walkway outside terminal building



Figure 2: Accessible drop off point



Figure 1: Arrivals Accessible Pick-Up Zone



Figure 5: PRM Assistance Desk



Figure 4: PRM designated Seating Area

The second important element of Article 5 is the presence of clear and correct signage throughout the airport. Appropriate signage can aid passengers in wayfinding but also the location of services throughout the airport, especially services for PRM passengers. Upon entering the main doors for departures, the check in desks are located directly in front of these doors. However, the PRM assistance desk is located through the doors and on the right-hand side.

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.”*⁵

In the IAA’s 2023 Airport Accessibility Compliance Report, a finding was made to update the signage on the PRM desks to highlight the available services in an appropriate colour which aligned with internationally recognised symbols. Figure 5 shows that the branding on the desk now advises passengers of the various assistance which can be booked for Shannon Airport. The signage includes symbols for wheelchair users, vision impairment, hearing impairments, and the Hidden Disability Sunflower (Shannon Airport is an official partner). The airport also advertises the PRM assistance on the pillar situated in front of the desk (Figure 5). Additionally, in close proximity to the desk is a reserved PRM seating area. While the seats are available for PRMs, the IAA noted that the seats do not have individual armrests and or a raised platform. They are also located around the corner from the desk. This IAA discussed the seating area with the airport on the day of the inspection and the airport has committed to have the seating in place by Q2 of 2025.

The signage throughout the remainder of the airport was relatively uniform and denoted internationally recognised symbols for accessibility. See Figure 6, Figure 7 and Figure 8 below as examples of toilet signage. Figure 9 and Figure 10 are examples of wayfinding signage.



Figure 7: Accessible Toilet - Gate



Figure 6: Accessible Toilet - Concourse

⁵ Regulation (EC) 1107/2006 Article 5.



Figure 8: Accessible Toilet

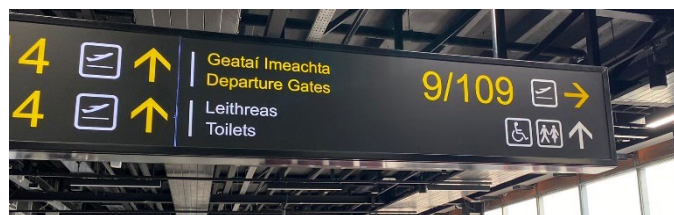


Figure 9: Departure Gates Signs in Black with Yellow Lettering



Figure 10: Departure Gates Signs in Black with Yellow Lettering

Once the passenger has passed through security (in a PRM designated lane), there is a large open concourse area which has several seating areas and a food/beverage area. The main concourse has toilets with a separate accessible toilet for passengers, see Figure 6. While there is no designated PRM seating in this concourse, the airport confirmed that there is always seating available and does not become too crowded.

While the toilet signs are relatively uniform in the standard blue and white, the wayfinding signs in the airport are high contrast black and yellow. This obligation on the airport is further emphasised in Annex I where it states the following: *Communication of information needed to take flights in accessible formats*. This ensures that the passengers with reduced mobility and/or disabilities have equal access to the wayfinding facilities of the airport.

3.1.1. Article 5 Findings

Appropriate PRM Seating

The IAA has found that there should be appropriate seating in close proximity to the PRM desk with raised seat and armrests either side. Under the Regulation, passengers should be able to announce their arrival with ease at designated areas such as a services desk or call point.

Therefore, to ensure the space is accessible for all passengers, appropriate seating should be provided and be reserved for those requiring the seats while waiting for assistance.

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.]”⁶

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.”⁷*

The airport receives requests for assistance through the airline messaging system ‘SITA’, email requests sent directly by the passenger to the service provider/airport and lists of passengers requesting assistance through ground handlers.

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.”⁸

Article 7 is read in conjunction with Article 6 and Article 8, which codifies the right to assistance at an airport but also highlights the importance of pre-notification of assistance requirements (Article 6). Prenotification by passengers ensures that the airport is equipped with enough staff to provide the necessary assistance. If a passenger does not pre-notify their requirements, the airport is required to make *all reasonable efforts* to provide the passenger with assistance. In general, this means that while the airport can provide the assistance, it is subject to additional waiting periods which are longer compared to the pre-notified waiting periods. Airports can use a variety of methods to predict passenger numbers such as historical data or advertising the importance of prenotification.

Shannon Airport uses a third-party contractor to provide assistance to persons with reduced and/or persons with disabilities. During the summer period, there were 18 dedicated PRM assistance agents employed to provide direct assistance to passengers. The airport noted that this number reduces to

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

⁷ Regulation (EC) 1107/2006 Article 6(4).

⁸ Regulation (EC) 1107/2006 Article 7(1).

15 agents in the winter. This is due to the increase in air travel during the summer months and thus, the increase in the uptake of PRM services in airports.

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.”⁹

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.”¹⁰

As provided for in Article 8, Shannon Airport has contracted Bidvest Noonan to provide the PRM services for the 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.”¹¹

The airport has developed [Quality Standards](#) in cooperation with the airport users committee (committee made up of stakeholders such as airlines and ground handlers). The airport has published these standards on their website under the ‘Age-Friendly’ web page.

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-.”¹²

⁹ Regulation (EC) 1107/2006 Article 8(1).

¹⁰ Regulation (EC) 1107/2006 Article 8(3).

¹¹ Regulation (EC) 1107/2006 Article 9.

¹² Regulation (EC) 1107/2006 Article 11.

The airport confirmed that all personnel who are customer facing receive disability awareness and disability equality training. The training is provided by an in-house certified trainer through the contracted service provider. Additional training is available for staff online. The airport is also an official partner with the Hidden Disability Sunflower organisation and as such, the sunflower can be seen integrated into the signs for the PRM services' desk. The airport's security personnel have training related to passengers with medical devices. The passenger can advise the security personnel whether they require privacy for the search.

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."*¹³

If a passenger's mobility equipment is lost or damaged, the airport will facilitate wheelchair rental through the Irish Wheelchair Association. 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. Ground handlers facilitate repairs arising from any damage associated with loading/unloading from the aircraft. 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.¹⁴

3.8. Article 15: Complaint Procedure

*"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."*¹⁵

The airport confirmed that it receives complaints from passengers relating to the PRM assistance received in the following formats: phone, email, letter/post, on social media and in person. The airport advised the IAA that they have received two complaints this year (2024) in relation to assistance.

¹³ Regulation (EC) 1107/2006 Article 12.

¹⁴ 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.

¹⁵ Regulation (EC) 1107/2006 Article 12.

The IAA can confirm that there are no open complaints relating to the PRM assistance at Shannon Airport at the time of publication of this report.

4. Summary Findings

Finding	Article (Regulation EC 1107/2006)	Corrective Action Plan	Timeline
No accessible seating for PRMs at PRM check in desk	Article 5	Appropriate PRM seating in close proximity to the PRM desk	End of Q2 2025
Aisle chair	Annex I	Replace damaged aisle chair	End of Q1 2025

Figure 11 Table of Findings

5. General Comments

The PRM assistance in Shannon Airport is available between 05:00 and midnight. The airport has an obligation under Regulation (EC) 1107/2006 to ensure PRM passengers can access the Care & Assistance under Regulation (EC) 261/2004 in the event of denied boarding, long flight delays and flight cancellations. Article 9(3) (Right to Care) states that the operating air carrier shall pay particular attention to the needs of persons with reduced mobility and any persons accompanying them. In providing this care, the air carrier must liaise with the airport representatives who should ensure the PRMs receive Care & Assistance if their flight is delayed or cancelled. Shannon Airport confirmed that it is the airport's policy to ensure that PRMs receive this Care & Assistance as per Regulation (EC) 261/2004.

[Shannon Airport](#) took the necessary steps to become an Age Friendly airport, along with Ireland West Airport, and is recognised as such by the World Health Organisation (WHO).¹⁶ Further information is on the airport's own website and also on [Mayo County Council's website](#).

Shannon Airport also recognised the needs of neurodivergent passengers by installing a sensory room in the departures area of the airport. The room does not need to be booked in advance and there is no requirement to show 'proof' of disability to the airport management body.

¹⁶ The Age-Friendly Cities Framework is a WHO initiative and more information is available [here](#).



Figure 12: Sensory Room

Website information pertaining to PRM passengers is located on two separate web pages: Passenger Assistance and Age-Friendly Airport. It is not inherently intuitive that the passenger would know to check both pages for information. Accordingly, the airport should review their website with an area expert to ensure full accessibility.

Shannon Airport conducts periodic visual inspections and periodic servicing on the mobility equipment in use at the airport. The equipment includes wheelchairs, Ambulifts, S-Max Stairclimber, aisle chairs, and a minibus. The airport confirmed that the maintenance checks are completed by a local company. It was noted on the day of the inspection that the airport's aisle chair had some wear and tear. Accordingly, while all other equipment appeared to be in working order, this aisle chair requires repair.



Figure 13: Aisle Chair

On the 24 December 2024, Shannon Airport opened its first "Changing Places" toilet facility at a landside location (before security) in the main terminal building. A Changing Places Toilet is an accessible sanitary facility with a toilet, hoist, washbasin, adult-sized changing bench and optional shower with adequate space for use by persons with a range of disabilities who may require assistance. This is the first such facility registered in County Clare. It is hoped that this will encourage and allow a greater number of the disability community to utilise the airport and to travel by air. Shannon Airport's management body advised the IAA that the hope is to develop further improvements in disability facilities into the future particularly plans with a focus on delivering an Airside Changing Places facility.

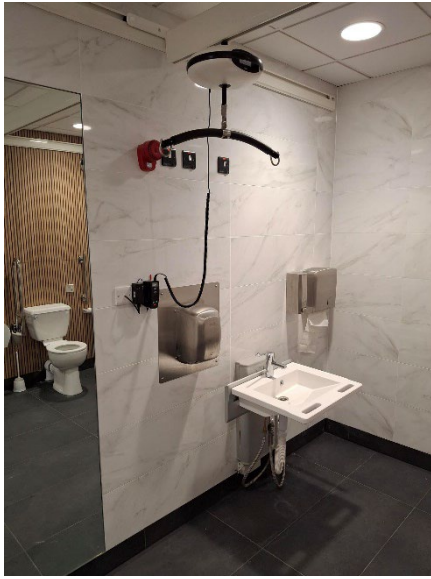


Figure 14 Sink with Hoist in Shannon Airport



Figure 15 Sign for various types of bathrooms and changing place

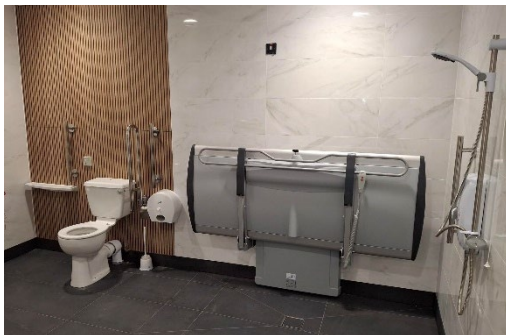


Figure 16 Changing Place in Shannon Airport

6. Conclusion

Shannon Airport caters to persons with reduced mobility and persons with disabilities and provides the services as outlined by Regulation (EC) 1107/2006. Additionally, the airport has implemented additional facilities for passengers such as installing a sensory pod for neurodivergent passengers. Shannon Airport is also a partner with the Hidden Disabilities sunflower and is recognised as an 'Age-

Friendly' airport by the World Health Organisation (the WHO). The airport is required to repair its aisle chair (as discussed in Section 4) or ensure that there is at least one other fully functional aisle chair. The airport has provided a corrective action plan to the IAA regarding the aisle chair and seating located beside the PRM desk.

Shannon Airport is an accessible airport, and care has been taken to ensure all aspects of the Regulation has been implemented with the airport advancing facilities for PRMs and persons with disabilities.

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