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## Høring – Hvitebok om EUs transportpolitikk fram mot 2050

Funksjonshemmedes Fellesorganisasjon (FFO) er paraplyorganisasjon for 71 organisasjoner av funksjonshemmede og mennesker med kronisk sykdom, med til sammen over 335.000 medlemmer. FFO har disse anbefalingene til det norske innspillet til Rådet og Europaparlamentet i saken.

Universell utforming er et satsingsområde i Norge, og ambisjonsnivået er lagt høyt. Innen 2025 skal hele Norge, inkludert transportsektoren, være universelt utformet. Universell utforming er ivaretatt i lovverket, handlingsplaner og tiltak innen de ulike områdene bygg, transport og ikt, samt innen de ulike forvaltningsnivåene. Det er også ivaretatt i sektorlovgivningen på transportområdet, samt i Nasjonal transportplan. FFOs erfaring er at dette ikke er ivaretatt på samme måte i Europa og EU-systemet. Der er det fortsatt i stor grad fokus på tilgjengelighet og assistanse, mens universell utforming handler om en likeverdig og selvstendig reisesituasjon for alle.

I den foreliggende hviteboken om EUs transportpolitikk i 40 år framover er tilgjengelighet for alle svært tynt beskrevet, og mye av fokuset er lagt på et bærekraftig og miljøvennlig transportsystem. Norske myndigheter bør, slik FFO ser det, benytte anledningen til å spille inn viktigheten av et universelt utformet transportsystem i framtidens Europa.

FFOs innspill handler om dette, og vi håper de ansvarlige for det norske innspillet i Samferdselsdepartementet vil ta våre synspunkter inn i sitt innspill til hviteboken. Mye av transporten skjer over landegrensene, og det er viktig med sømløse og gode løsninger mellom landene for at hele reisekjeden skal være av god kvalitet. FFOs innspill er på engelsk.

### **The White paper on transport and accessibility for all**

People with disabilities make up approximately 17 % of the population. Persons with reduced mobility in the wider sense - including older persons, parents with children and persons with heavy luggage - can make up about 40 % of all passengers. With the demographic changes and the ageing population the need for accessible transport is increasing. Moreover, accessibility through design-for-all increases the comfort of all passengers.

The European Commission adopted a communication for the future of transport policies and actions in the EU on the 17th of June 2009. This was the first step in formulation of a new European policy framework for a sustainable transport system in Europe. European Disability Forum, the European umbrella organization for national councils of disabled people throughout Europe (like FFO in Norway) has been invited to identify the three key priorities they would like to see included in this forthcoming strategy.

EDF have stressed the importance of including three measures in this respect: effective enforcement of existing legislation, establishing a long-term strategy in order to ensure that all passenger can use all modes of transport on an equal footing and the need of standards and harmonization to ensure an integrated transport sector ensuring seamless travel for passengers and, most importantly, full inclusion and accessibility of persons with disabilities.

### **Effective enforcement of existing legislation**

Several pieces of legislation have been adopted by the EU, which contain important provisions for persons with disabilities, such as the regulation on the rights of passengers when travelling by air, the rail passenger regulation, the directive on maritime safety requirements, the bus and coach directive, the technical specifications on rail accessibility etc. However, the whole value of legislation lies in the effective enforcement of it and the correct implementation and interpretation of it.

Passengers are still discriminated all too often at European airports and by European airlines, at railway stations etc, despite these strong legislative provisions. Information is often not available in accessible formats, personnel is not always trained on disability-awareness or on how to handle mobility equipment and assistive devices. The accessibility of the buses and passenger vessels still leave a lot to desire and technical accessibility devices are not always functioning.

### **Establishment of a long-term strategy to ensure that all passengers can use all modes of transport**

The UN Convention on the rights of persons with disabilities requires through its Article 9, that all State Parties, thus including the EU, shall ensure accessibility to transport. The European Commission should thus revise and complete existing legislation and complementing with new measures in order to ensure a fully accessible transport sector in the future.

People with disabilities have to be considered as an active part of the European population that have the right to contribute and be part of society as all other citizens. But this requires also that you have to get access to the same services as all other citizens. Special solutions for people with disabilities should be an exception as these services as exclusive for the people concerned, but also costly for society.

It is worrying for us to see that discussions are currently going on in the EU Council of ministers to limiting the scope of application of the proposal for bus and coach passengers, to only cover long-distance transport, thus excluding a general right to transport for persons with disabilities at regional and local level. This is in

contradiction with the purpose of these proposals as we should target further inclusion instead of additional restrictions.

If we are to reach full access, it is also essential that no EU TEN (trans-European Networks) budget should be provided unless the projects ensure design for all. Exclusion costs money and cannot be accepted by a modern society. The European Commission should be proactive in this respect in initiating policy measures that will lead to further inclusion of EU citizens.

### **Standards and harmonization to ensure an integrated transport sector**

Formal European standards on accessibility must be developed as a complement to legislation. Those standards must be fully compatible between all modes of transport to be of any real value and in order to create barrier-free transport. All stakeholders must work together to have a global view of the whole transport network and to contribute with all the necessary pieces to ensure an inclusive and accessible transport sector.

Safety and security measures should be integrated in all relevant standards as they are absolutely essential but all too often not sufficiently guaranteed for persons with disabilities. Formal standards would be the tool for tackling this. Standards would also be a means for complying with existing and forthcoming passenger rights regulations. As an example there is a need for ensuring harmonized disability awareness training, provided in cooperation with representative organizations of persons with disabilities. In the same way, there is a need for creating standards on assistance to persons with disabilities by transport personnel, how to provide information in accessible formats and so on.

Standards is a tool for ensuring compliance with existing legislation and would in that sense be a support for as well the transport industry (they would know what to provide and how to ensure quality transport for all) as for the passenger who would know what to expect when travelling.

The European Commission should be encouraged to launch standardization mandates in the area of accessibility to transport, covering as well technical specifications as assistance to and welcoming of passengers with disabilities. User participation in the drafting of these standards is essential in order to ensure the best possible outcome of those.

FFO ask that the Norwegian Ministry of Transport point out to the Commission the importance of accessibility for all in the future, and the synergy effects it will have on efficiency and safety within the transport system, and not least all the satisfied travellers that will come out of it throughout Europe.

Med vennlig hilsen

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Jarl Ovesen  
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