

**Guide Dogs' Response to European  
Commission Staff Working Paper  
Rights of passengers in international bus  
and coach transport**

**A Consultation Document**



**Guide Dogs**

**Submitted by:**  
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**To:**  
**European Commission**  
**Directorate-General for Energy and Transport**  
**For the attention of Mr Peter Faross**  
**Head of Unit A5**

**Rue de la Loi 200  
B-1049 Brussels**

**10 October 2005**

**Dear Mr Faross**

Thank you for giving Guide Dogs the opportunity to respond to this very important consultation *EU Commission Staff Working Paper Rights of passengers in international bus and coach transport*. As one of the leading charities for blind and partially sighted people, we are very happy to be able to contribute to this important consultation.

Guide Dogs is the world's largest breeder and trainer of guide dogs, and the UK's largest single provider of mobility and other rehabilitation training for blind and partially sighted people. Each year, we help thousands of visually impaired clients to negotiate public transport, either with a guide dog or long cane.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Peter Barker', followed by a period.

Peter Barker  
**Head of Policy & Research**

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## European Commission Staff Working Paper Rights of passengers in international bus and coach transport

### Guide Dogs' Response

#### 1 Introduction

- 1.1 Guide Dogs for the Blind Association (Guide Dogs), welcomes the opportunity to comment.
- 1.2 Guide Dogs is one of the leading charities for blind and partially sighted people.
- 1.3 Guide Dogs is the world's largest breeder and trainer of guide dogs, and the UK's largest single provider of mobility and other rehabilitation training for blind and partially sighted people. Each year, we help thousands of visually impaired clients to negotiate public transport, either with a guide dog or long cane
- 1.4 Our vision is for a world in which all people who are blind and partially sighted enjoy the same rights, opportunities and responsibilities as everyone else. We help blind and partially sighted people to achieve independence and mobility through the provision of guide dogs and rehabilitation services - yet this independence is limited by the environment in which visually impaired people must live. The current inaccessibility and lack of integration of much of the public transport system means that blind and partially sighted people - who make up 24% of the total number of disabled people in the UK - are marginalised from many aspects of public life.
- 1.5 Figures from the 1999 DSS Research Report No. 94 'Disability in Great Britain', indicate there are now an estimated 1.97 million people with a significant sight loss.
- 1.6 Guide Dogs believe that blind and partially sighted people should be able to move around safely and independently. This is currently often not the case and barriers may be physical, operational or attitudinal.

Question 1: Given that passengers of other modes of transport enjoy many rights under international or Community regulations which are not offered to bus and coach passengers, do you agree that equal treatment ( a level playing field) should be ensured between bus and coach operators in different Member States in terms of protection of passenger's rights?

**Yes. It is essential to ensure that all passengers, but more importantly disabled passengers, enjoy the same rights whatever mode of transport they choose. It is accepted that many disabled people are on lower incomes and would be more likely to travel by bus or coach in order to reduce the cost. It is even more important, therefore, to protect the rights of passengers travelling by bus and coach to ensure that a 'two**

**tier' transport system is not allowed to develop as in many cases those choosing to travel by this means are the most vulnerable.**

Question 2: Should this be addressed at EU level? What are the most cost effective means to meet this objective?

**Yes. This should be addressed at EU level.**

Question 3: Should only international services be regulated and domestic services be left to each Member State?

**No. The scope of the regulation should not be restricted to international services. Disabled passengers should be offered a safe, accessible and affordable bus and coach transport service which they can have confidence in. This will not be achieved by allowing individual Member States to 'opt out' of providing the same standards on domestic services which are provided on international services.**

Question 10: In case of injuries suffered in Member States other than the State in which the journey began, which national liability rules should apply? Those of the country where the passenger bought the ticket or those of the place of origin or destination or transit? Where should passengers be able to file a lawsuit?

**The place where the passenger bought the ticket is where responsibility should be and it should be under the national liability rules of that country that any law suit is filed.**

Question 15: Should passengers be provided with appropriate assistance (hotel accommodation, meals and refreshments, telephone calls) if their journey is interrupted?

**Yes. The assistance provided should include, but not be limited to, hotel accommodation, meals and refreshments, telephone calls and whatever else is necessary at the time. In the case of a guide dog or other assistance dog owner a suitable and safe area to exercise and relieve the dog should be identified and appropriate assistance should be given to enable the assistance dog owner to use this facility.**

Question 19: Should coach operators be required to provide assistance to persons with reduced mobility?

**Yes. Staff at all levels, management, booking staff, station staff and drivers should be provided with proper disability equality training to enable them to recognise and respond to the different needs of disabled people. The assistance provided should include, but not be limited to, travel and booking information in the required format (large print, tape, Braille etc), coach orientation prior to travel for blind and partially sighted passengers, onboard assistance as and when required by means of audio announcements and sighted guide assistance when necessary to disembark and locate a suitable point of safety or comfort.**

Question 20: What should the assistance for persons with reduced mobility consist of?

**See previous answer.**

Question 21: Should coach operators be required to provide for the transport of equipment for persons with reduced mobility? Given the design of their vehicles, is this feasible?

**Yes. If this is not made a requirement, the operators will have legal justification to refuse to carry a disabled person on the grounds of his disability and that cannot be acceptable. It may be necessary to look at the future manufacture of vehicles to ensure that this requirement is made practical and affordable for the operators and Guide Dogs would encourage the manufacturing industry to consult disabled groups in the development of any new vehicles.**

**In the case of guide dogs and other assistance dogs, operators should be required to carry a minimum of two assistance dogs per vehicle to allow a couple, married or otherwise, to travel together. Adequate space for both dogs and owners should be provided and there should be no requirement made to sedate, muzzle or otherwise contain the assistance dog during or prior to the journey.**

Question 22: Should any rules on facilities and assistance for persons with reduced mobility also be extended to urban transport? What are the existing practices and obligations in Member States?

**Yes. In the case of guide dogs and other assistance dogs, urban transport providers in Member States should be required to carry a minimum of two assistance dogs per vehicle to allow a couple, married or otherwise, to travel together. Adequate space should be provided and there should be no requirement made to sedate, muzzle or otherwise contain the assistance dog during or prior to the journey.**

Question 24: How and when should the coach operator be notified of the need for assistance for persons with reduced mobility.

**Where possible a disabled person should request, either by telephone, fax, email or other, assistance from the operator at least 24 hours prior to travel. However, if this is not possible, the coach operator shall make every effort to provide assistance as requested.**

Question 25: Should any additional facilities be available at coach terminals?

**Yes. In the case of guide dog or other assistance dog owners, a suitable, safe area where the assistance dog can be allowed to relieve should be identified and made available to guide dog and other assistance dog owners when requested. In addition, many coach journeys are made from alternative points other than coach terminals (car parks etc) and often there is no clearly defined pick up point. It should be made a requirement of the coach operator to ensure that pick ups are made from a recognised and identifiable point to allow blind and partially sighted passengers to board safely.**

Question 26: What conversion/adaptation of coach terminals could be required in order to provide persons with reduced mobility with adequate assistance?

**In the case of coach terminals, use of appropriate tactile surfacing could be used to identify pick up points, crossings and other amenities within**

**the terminal. Also colour contrast and good signage and pictograms which would also benefit passengers with language difficulties as well as those passengers with learning difficulties.**

Question 27: Should organisations representing persons with reduced mobility be involved in consultations concerning all identified shortcomings in bus and coach transport?

**Yes. Organisations representing persons with reduced mobility should be involved throughout the consultation process and, in addition, at any future point in time in order to provide proper disability equality training to the bus and coach operating industry.**

Question 35: With regard to package tours, should the identity of the coach operator be disclosed upon conclusion of the contract or with reasonable notice before the start of the tour?

**The identity of the coach operator should be disclosed upon conclusion of the contract to allow the disabled passenger the opportunity, at no extra cost to themselves, to make alternative travel arrangements with another tour operator. In the United Kingdom, many of the UK airlines have now agreed and accepted a protocol by which the carriage of guide dogs and other assistance dogs under the Pets Passport Scheme can be made. This protocol means that a guide dog owner can now expect a certain level of customer care when they travel with their dog. As an organisation representing people with reduced mobility Guide Dogs can now recommend those airlines as offering a good service to our clients. The bus and coach operators have yet to establish any kind of agreed protocol for the carriage of guide dogs and other assistance dogs and good and bad practice prevails. Until such protocol is established it is vital to provide passengers with reduced mobility with all available information prior to travel, including but not limited to, the coach operator on a package tour. This will encourage good practice in the industry and may also lead to an agreed protocol for the carriage of guide dogs and other assistance dogs.**

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