



HIDDEN DISABILITIES SUNFLOWER AND PROGRESS TOWARDS MORE ACCESSIBLE AIR TRAVEL

In May 2024, PionAirLaw published a newsletter on the *Hidden Disabilities Sunflower* programme – an initiative launched at Gatwick Airport in 2016 which, through a simple sunflower lanyard, enables a person with a non-visible disability to indicate voluntarily and discreetly that they may need help, understanding or simply a little more time.

At the time, we acknowledged the efforts of the airlines and airports that had begun adopting it and highlighted the need to continue working towards more accessible air travel for people with non-visible disabilities.

Since then, new participants and the expansion of support initiatives have helped to make the Sunflower more widely recognised. More than two years on, and to coincide with *Invisible Disabilities Week*, organised by the *Invisible Disabilities Association* from 18 to 24 October 2026¹, we have therefore decided to revisit the issue to see how far we have come.

While the programme's expansion is a welcome development, its usefulness depends on that recognition translating into appropriate support throughout the journey. In this newsletter, we will therefore discuss new participants, the coexistence of the Sunflower and Aena's identification scheme – Aena being Spain's leading airport operator, which also operates airports in other countries – and the challenges involved in implementing the programme, within a legal framework in which it is important to distinguish existing obligations from reforms planned for the coming years.

THE SUNFLOWER PROGRAMME, PROGRESS IN THE AVIATION INDUSTRY AND THE SITUATION IN SPAIN

As a starting point, it is worth acknowledging that the Hidden Disabilities Sunflower programme has continued to establish itself as a leading international initiative for recognising and supporting people with non-visible disabilities. An increasing number of organisations recognise

the symbol and commit to training their staff to recognise and respond appropriately to the needs of those who wear it².

The participation of airlines and airports is undoubtedly welcome news, as it increases the likelihood of travellers encountering staff who are familiar with the symbol and prepared to offer support. The real value of this initiative lies in making it easier to communicate these needs discreetly and simply, avoiding explanations that can be particularly difficult in certain circumstances and crowded environments.

In Spain, we must also acknowledge the progress made by Aena, which has continued to expand the availability of its own identification scheme for people with non-visible disabilities beyond the eleven airports mentioned in our 2024 newsletter³. The high volume of passengers passing through the airports operated by the group and its international presence, particularly in Brazil and the United Kingdom⁴, give Aena a particularly important role in promoting accessibility in air travel.

However, it should be noted that the two forms of identification – although they share the aim of making the airport experience easier for people with non-visible disabilities – differ in their practical effects. As Aena itself explains, while the Sunflower lanyard identifies those who may need a little more help or time during their journey through the airport, Aena's own identification also facilitates access to security checkpoints for families and persons with reduced mobility or, where these are unavailable, passage through the general security checkpoint, as far as possible⁵.

In this regard, while acknowledging the value of both initiatives, we believe there is still considerable room for improvement. If the shared aim is to make travel easier for people with non-visible disabilities, it may be worth considering how the two identification schemes could better coexist, also bearing in mind the high volume of passengers passing through Aena-operated airports. In our view, closer coordination between Aena, the Sunflower programme and airlines would be desirable, so that

¹ [Invisible Disabilities Week 2026 Banner - Oct 18 thru 24 - Invisible Disabilities Association](#)

² By way of illustration, examples include Aer Lingus, which announced its membership of the programme on 27 February 2025, noting its presence at more than 285 airports worldwide ([here](#)); Lufthansa, which joined in December 2025, with the aim of gradually extending the initiative to all Lufthansa Group airlines by the end of 2026 and strengthening staff training ([here](#)); and easyJet, which has also joined the programme and recognises the Sunflower symbol throughout its network ([here](#)). In August 2026, the programme had more than 340 participating airports and 31 airlines ([here](#)).

³ By way of illustration, airports currently offering this identification include Bilbao, Vigo, Reus, Tenerife North and Fuerteventura, bringing the total to 20 participating airports, according to information published by Aena ([here](#)).

⁴ Airports operated by the Aena Group recorded 384.8 million passengers in 2025, of whom 321.6 million passed through its Spanish network. Its activities also extend to other countries, including 17 airports in Brazil and the operation of London Luton and Leeds Bradford in the United Kingdom, according to information published by Aena on its [2025 results](#) and [September 2026](#) traffic.

⁵ Aena's identification can be presented in physical or digital form and is valid for a single use on the day of the flight, whereas recognition of the Sunflower lanyard depends on the participating organisations. Neither form of identification replaces a request for any assistance services the passenger may need. This difference has prompted Hidden Disabilities Sunflower itself to publish a specific clarification on Spain, explaining that the Sunflower does not provide access to family and reduced-mobility security checkpoints or fast-track lanes at Aena airports, and describing Aena's identification as an additional assistance programme that coexists with recognition of the Sunflower ([here](#)).

passengers have clear information about the different forms of support available and the conditions for accessing them. Including information about Aena's identification scheme in Sunflower programme materials, together with greater efforts by the airport operator to explain how the two forms of identification can be used together, could help to reduce the uncertainties these travellers still encounter.

Ultimately, the shared aim should be to draw on the reach of both initiatives to make travel easier for people with non-visible disabilities, ensuring that differences between the two schemes do not create uncertainty for the very people they are intended to help. After all, the reach of these initiatives and the efforts of the organisations behind them should help people with non-visible disabilities receive appropriate support throughout their journey, regardless of the airport or airline they travel with.

CHALLENGES AND OPPORTUNITIES FOR MORE INCLUSIVE AVIATION

To achieve this, it is essential that recognition of both initiatives translates into appropriate support at each stage of the journey – check-in, security checks and boarding gates – and, in the case of the Sunflower programme, on board as well.

People with non-visible disabilities may have very different needs, ranging from a little more time to understand certain instructions to additional assistance when faced with stress, crowds or unexpected changes to their flight. It is therefore essential that airline and airport staff have the training and resources needed to provide support appropriate to each passenger's individual circumstances.

This support must also respect travellers' autonomy, personal dignity and privacy. We must remember that the use of both forms of identification is voluntary and that, in the case of the Sunflower, the aim is to enable passengers to communicate discreetly that they may need support, without having to explain their condition or diagnosis repeatedly⁶.

However, for the measures adopted to meet these passengers' needs effectively, we also believe it is essential to learn about their experiences and listen to their views, as we advocated in our May 2024 newsletter.

In this regard, we find it particularly encouraging that some airlines are beginning to develop mechanisms for incorporating these travellers' views and contributions directly into their accessibility policies, helping to identify the difficulties they still face and adapt procedures and services to their actual needs⁷.

Staff training, respect for each passenger's individual circumstances and their involvement in improving services are therefore, in our view, essential elements in continuing to work towards truly accessible and inclusive aviation.

THE EUROPEAN LEGAL FRAMEWORK AND ONGOING REFORMS

There have also been significant legal developments since our previous publication, reflecting the European institutions' growing concern to strengthen protection for passengers with disabilities or reduced mobility.

As a starting point, we should recall that Regulation (EC) No 1107/2006⁸ remains the principal legal instrument in this field, and that its protection also extends to people with non-visible disabilities, whether or not they use a specific form of identification.

In October 2024, the European Commission published new interpretative guidelines intended to promote more consistent application of the Regulation, expressly recognising non-visible disabilities and highlighting the usefulness of voluntary identification schemes, such as lanyards



or wristbands⁹ – a category that includes the programme.

More recently, the European Union has continued to make progress in reviewing passenger rights. One development worth highlighting is proposal COM(2023) 753¹⁰, which provides, among other things, for amendments to Regulation (EC) No 1107/2006 concerning the quality of assistance services, enforcement monitoring and complaints procedures. A provisional agreement on the proposal was reached in July 2026 and endorsed by the European Parliament on 20 October that year, with formal approval by the Council still pending.

Its new provisions include, for example, an obligation for airlines to establish and publish service quality standards – previously required only of airport managing bodies – which must include dialogue with organisations representing persons with disabilities and staff training in this area. They also include new time limits for handling complaints – acknowledgement within seven working days and a reasoned reply within one month – and place the burden of proving that the passenger received the required information on the airline. Staff training, which lies at the heart of the Sunflower programme, would thus move from a voluntary commitment to an obligation subject to oversight.

Another development deserving particular attention is the recent adoption of Regulation (EU) 2026/2202¹¹, which amends the European framework for compensation and assistance for air passengers and introduces significant new provisions for persons with disabilities or reduced mobility¹². In particular, it strengthens safeguards concerning accessible information, assistance during operational disruptions and protection for passengers who need an accompanying person. These include, subject to certain conditions, the possibility of occupying adjacent seats at no additional charge and the obligation to provide compensation, re-routing and assistance where a failure to comply with airport assistance obligations causes a passenger to miss their flight.

Although these developments represent positive steps, it should be

⁶ The processing of information about passengers' disabilities is subject to the safeguards laid down in Regulation (EU) 2016/679 (GDPR).

⁷ For example, in 2025 the Lufthansa Group announced the creation of a customer advisory committee representing different accessibility needs, intended to help improve its services ([here](#)).

⁸ Regulation (EC) No 1107/2006 of the European Parliament and of the Council of 5 July 2006 concerning the rights of disabled persons and persons with reduced mobility when travelling by air.

⁹ Interpretative Guidelines C/2024/5992 on Regulation (EC) No 1107/2006.

¹⁰ Procedure File: 2023/0437(COD) | Legislative Observatory | European Parliament.

remembered that they do not establish a specific regime for non-visible disabilities or confer additional rights merely by virtue of wearing a Sunflower lanyard. Voluntary accessibility initiatives must, in any event, complement statutory assistance obligations, and the use of a particular form of identification must not become a condition for exercising the rights to which a passenger is entitled.

In our view, these legislative developments offer an opportunity to continue strengthening protection for persons with disabilities in air travel, ensuring that recognition of their needs translates into increasingly clear and effective safeguards at every stage of the journey.

CONCLUSIONS

More than two years after our previous publication, we are pleased to see that the Hidden Disabilities Sunflower programme continues to grow and that an increasing number of airlines, airports and airport operators – such as Aena – are adopting initiatives to make travel easier for people with non-visible disabilities. We would therefore like to reiterate our thanks to all the organisations that have taken this step, helping to make the aviation industry increasingly accessible and inclusive.

However, as we noted in May 2024, we remain convinced that the true effectiveness of these initiatives requires ongoing staff training, appropriate coordination between the different operators and, above all, active listening to passengers' experiences and needs, so that services can continue to improve and the barriers that still make travel difficult can be removed.

At PionAirLaw, we continue to encourage airlines and airports that have not yet joined the programme to do so as soon as possible, and those already taking part to continue developing measures that provide assistance increasingly suited to all passengers' needs.

Although we have come a long way since May 2024, there is still more to do to achieve truly accessible aviation, in which everyone can enjoy the freedom to travel with autonomy, confidence and peace of mind.

Thank you for the progress made. But we still want more.



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