

EASA	COMMENT RESPONSE DOCUMENT
	SC on Medical Evacuation configuration Applicable to Large Aircraft category Issue 1

Commenter 1 : Lufthansa Technik

Comment # 1 –

The SC does not adequately consider or explicitly excludes passenger cabin configurations that include both, normal passenger seats and also medical evacuation equipment like stretchers or patient transport units.

Comment:

Item "f" of the SC should/could be re-worded as "The conditions of limitation for transportation of fare paying passengers and the related operation has to be defined clearly due to concurrent transportation of incapacitated and fare paying passengers in the same transport category airplane."

EASA response:

The proposed Special Conditions are applicable to Large Aeroplanes configurations to be used for medical evacuation. Any configuration that is fully compliant with part 25 is of course entitled to commercial operation, i.e. when compliance with CS-25 can be demonstrated, subject Special Conditions do not apply.

Commenter 2 : AustroControl

Comment # 1 –

Title of the Special Condition

Comment:

The wording "Medical evacuation" should be explained -otherwise could be brought into conjunction with "our evacuation" according CS 25.803.

More generally, This should be clearly defined if this SC applies only to configurations with several stretchers installed or also applicable for 'ambulance' versions with e.g. only one stretcher installed.

EASA response:

EASA considers that both the title and the statement of issue of the CRI clarify that the Special Conditions are not applicable to conventional airline configurations used for commercial operation and fitted with a very low number of stretchers.

Comment # 2 – Statement of Issue

Regarding the non-compliance(s) with 25.785(j) that medical configurations can introduce, it is not always said that these configurations are not compliant with these regulations.

Comment:

Wording should be changed.

EASA response:

EASA disagrees with the commenter.

Statement of issue says "in general" and the SC is relieving. Consequently EASA sees no need to change a relieving requirement which may or may not materialize, despite a high probability.

Comment # 3 – Special Condition

In case of low number of stretchers, the assumption that medical assistants could assist in case of the evacuation.

Comment:

Austrocontrol always asked for the adequate numbers of able bodied persons to accomplish the evacuation of stretchers, this had been

part also in the AFM Supplement. Although an operational issue this should be part of the SC.

EASA response:

EASA agrees with the intent of the comment.

It must be noted that Special Condition a) attempts to achieve exactly the proposed objective without suggesting specific solutions: all practicable design precautions and operational procedures must be developed to facilitate evacuation without compromising the egress of cabin attendants and other passengers.

Precautions may include features such as location relative to normal passenger seating and emergency exits, easy release of stretchers from their attachments to the a/c to enable patients to be stretcher borne to emergency exits, easily accessed patient restraint buckles to alternatively allow removal and direct carrying of patients, associated training/briefing procedures for attendants, etc...

Proposed design precautions and procedures will be evaluated by the Agency for acceptability.

An entry shall be made in an AFM supplement to define the procedure to be followed for the evacuation of the occupants of the stretchers.

Comment # 4 – Special Condition

Recommendation of wording change:

Comment:

AustroControl would recommend to change wording through the sentence "*It can only be **concluded that, in certain cases, stretcher born occupants will have very little chance of rapid evacuation.***", by for instance "*presumed that evacuation of stretchers will take longer than Evacuation of ambulant persons*".

EASA response:

Partially accepted.

Wording is changed as follows: " it can only be concluded that, in certain cases, evacuation of stretcher borne occupants will be significantly slower than that of other cabin occupants.",

Comment # 5 – Special Condition

Recommendation of wording change under a).

Comment:

AustroControl would recommend to change wording through the sentence "*In regards to stretcher occupants, all practicable design precautions and operational procedures must be developed to facilitate evacuation without compromising **the egress of cabin attendants and other passengers.***", by for instance "egress of occupants".

EASA response:
EASA agrees with the proposed wording change.

Comment # 6 – Special Condition

Recommendation of wording change under a).

Comment:

AustroControl would recommend to change wording through the sentence "*In regards to stretcher occupants, all practicable design precautions and operational procedures must be developed to facilitate evacuation without compromising **the egress of cabin attendants and other passengers.***", by for instance "egress of occupants".

EASA response:
EASA agrees with the proposed wording change.

Comment # 7 – Special Condition

Observation under b).

Comment:

Within the sentence "*In areas where closely spaced firm handholds cannot be easily provided as per 25.785(j), (e.g. along aisle portions where stretchers are installed) all practicable efforts must be taken to provide **useable handholds** to enable passengers to reach their designated seats.*", .AustroControl highlights that handholds are not only for passengers.

EASA response:

EASA agrees with the proposed wording change.

The sentence will be changed as follows: "In areas where closely spaced firm handholds cannot be easily provided as per 25.785(j), (e.g. along aisle portions where stretchers are installed) all practicable efforts must be taken to provide useable handholds to enable cabin occupants to reach their designated seats".

Comment # 8 – Special Condition

Notes under d).

Comment:

AustroControl highlights that not only the distribution but also the donning is questionable and should be reflected in the procedures. In addition, floatation means may not be adequate for stretcher occupants,(eg thinking on seat cushions) then life preservers should be required.

EASA response:

EASA agrees with the proposed wording change.

Special Condition d) will be revised to require that, also for aeroplanes not certificated for ditching under 25.801, there must be a life preserver for each stretcher occupant.

Comment # 9 – Special Condition

Note under e)2).

Comment:

AustroControl would recommend avoiding the term "safest alternative" which sounds too vague. On the other hand "**should** be such that they have to be within easy reach of each occupant." is contradictory to "safest alternative", then AustroControl recommends a rewording and to use 'to have to' instead.

(So what would be the required design if you have e.g. three stretcher one above the other?)

EASA response:

EASA disagrees with the proposed wording change.

Considering the question in bracket, the SC is established to propose a generic approach on the Medical Evacuation matter, and do not foreseen to address specific design. This has to be assessed on a case by case basis.

Comment # 10 – Conclusion

A lot of existing STCs are certified in compliance with TGM/25/12.

TGM/25/12 has been written under the assumption that one to two stretchers were taking into account and not considering a cabin full of stretchers, whereas the SC is requiring the compliance with Appendix F JAR/CS 25 and 25.853(c).

Comment:

If it is foreseen that for 1 to 2 stretchers, this fire blocking SC requirement should be applicable?

EASA response:

EASA current policy is to require compliance with CS-25 App. F part II for the stretcher mattress, regardless of the number of stretchers installed.

EASA Note : Following the comments received, EASA has decided to modify and to re-issue the Special Condition on “Medical Evacuation configuration”- Applicable to Large Aircraft category – (Click here - [hyperlink](#)).

Most of the changes brought to the initial issue were editorial, therefore a new consultation has been judged not needed.