

<b>EASA</b>	<b>COMMENT RESPONSE DOCUMENT</b>
	<b>Proposed Deviation D-xx on installation of non-smoking signs (Applicable to Large Aeroplane fitted with VIP or Executive interior)</b>

**Note :** Following the consultation of this Deviation, and in accordance with some of the comments received, the initial Condition will be slightly amended.  
Due to the minor aspects of the changes, the new issue of the Condition will not be subject to a new public consultation.

**Commenter 1 : Dassault-Aviation**

**Comment # [1] – Applicability**

This proposed deviation is limited to private use airplanes, where the EIR Working Group NPA extends this deviation to “low occupancy” public transport airplanes.

**Comment :**

It is understood that the term “low occupancy” is not defined officially yet, therefore Dassault-Aviation would suggest, as a minimum, to extend the deviation applicability to airplanes with 19 passengers or less (private or public).

**EASA response:**

**Disagreed.**

***The proposed deviation is related to an ongoing VIP interior completion certification project. The aircraft modified by this project will be limited to private use. It is not the intention of EASA to impact the EIR Working Group NPA proposal that is addressing similar issues and is meant to introduce a change to the Certification Specifications.***

**Commenter 2 : Airbus Corporate Jet Center**

**Comment # [1] – Applicability**

As presented, the title is misleading the reader on the content of the deviation.

**Comment :**

Indeed, when quoting CS 25.853(g) in the deviation, it permits applicants not to install ashtrays in and outside lavatories together with the possibility to install one single non-smoking placard per entry door. This allowance is in line with the proposal contained in the draft NPA for “Executive Interior Accommodation”, but needs to be more visible in the title of the deviation.

It is proposed to change into: *Proposed Deviation on Installations of non-smoking signs and ashtrays Applicable to Large Aeroplanes fitted with a VIP or Executive interior*

**EASA response:**

**Agreed.**

**The wording will be adapted as proposed.**

**Comment # [2] – Statement of Issue**

*“EASA considers that an acceptable level of safety, for non-commercially used aeroplanes, could be established in lieu of compliance to CS 25.791(a), CS 25.791(d) and CS 25.853(g), if:*

*1. Smoking is prohibited on board of the aircraft, (...)”*

The draft NPA for “Executive Interior Accommodation” proposes to use this deviation not limited to non-commercial operations, but also applicable to commercially operated aeroplanes of low occupancy (definition introduced by the draft NPA). Pending the publication of this draft NPA and the introduction of the notion of “low occupancy” aeroplanes in the regulation, the limitation to non-commercial operations should be recorded in the limitation section of the Aeroplane Flight Manual

**Comment :**

Pending the publication of this draft NPA and the introduction of the notion of “low occupancy” aeroplanes in the regulation, the limitation to non-commercial operations should be recorded in the limitation section of the Aeroplane Flight Manual. It is then suggested to change

to:

1. *Smoking is prohibited on board of the aircraft.*

*The limitation for non-commercial operations shall be noted in the Limitations Section of the Aeroplane Flight Manual, (...)"*

**EASA response:**

**Agreed.**

**The proposed deviation will be changed to include "The limitation for non-commercial operations shall be noted in the Limitations Section of the Aeroplane Flight Manual" .**