

Comment				Comment summary	Suggested resolution	From the commenter point of view a modification of the published text is*: -Not requested; -Recommended; -Requested	EASA comment disposition	EASA response
NR	Name of the organisation commenting	Section, table, figure	Page					
1	The Boeing Company	Special Condition	2 of 2	Overall special condition has primary focus associated with CS 25.855(a) and CS 25.857; however, special condition does not address restraint of subject storage containers as mentioned in Identification of Issue, second paragraph, first sentence.	Special condition should cover these additional aspects: <ul style="list-style-type: none"> • Cargo items should be stowed only in a location that is capable of restraining it per CFR 25.561 and other applicable structural requirements. Cargo placed in enclosed stowage areas should not be of such size that they prevent latched doors from being closed securely. The number/type of restraint devices and their attachment points should be capable of restraining the cargo in accordance with applicable certification specifications. The restraint system used must prevent load shift under all conditions of flight; • Cargo stowage location should be such that, in the event of an emergency evacuation, it will not hinder egress; • Cargo should not be placed where it can impede access to emergency equipment; • Checks should be made before take-off, before landing, whenever the fasten seat belts signs are illuminated, and under orders of pilot in command to ensure that cargo is properly stowed. The cargo cannot impede evacuation from the aircraft or cause injury by falling (or other movement) as may be appropriate to the phase of flight. 	Recommended	Noted	The special conditions address fire protection aspects of the design of the storage containers. EASA agrees that the items suggested by the Commenter in the suggested resolution field are relevant to the installation under discussion. However, such items are outside the scope of the special conditions proposed by EASA. As a consequence, no change will be introduced to the special conditions.
2	The Boeing Company	Special Condition	2 of 2	Cabin preparation related to fire safety.	Special condition should cover these additional aspects: <ul style="list-style-type: none"> • Any heat generating systems (IFE, In-seat power, galley systems, etc.) in the cabin areas that the containers are located shall be disabled or deactivated; • Automatic supplemental oxygen systems in the cabin areas in which cargo is transported will have to be removed from the PSU channels without leaving any opening or be deactivated. 	Recommended	Partially Accepted	EASA agrees that the items suggested by the Commenter in the suggested resolution field are relevant to the installation under discussion. However, such items are already addressed by special condition 3, which requires that the storage containers must contain fires likely to occur based on the operating limitations specified in special condition 1, so that a cargo fire event will not prevent continued safe flight and landing. In order to demonstrate compliance with special conditions 3, the applicant has to address the effects that a fire developing inside a storage container may have on critical systems installed in proximity of that container, including any oxygen systems and any electrical systems. As a consequence, no change will be introduced to the special conditions.
3	AIRBUS	Para 1) b.	Page 2/2	The possibility for the carriage of dry ice needs to be clarified in the special conditions. Recent Cargo in Cabin projects in all aircraft programs aimed at among others transporting medical supplies especially vaccines against Covid 19. An exemption on Dangerous Goods as mentioned could be granted for the carriage of dry ice in the Cabin.	“prohibit the carriage of dangerous goods, batteries (including batteries contained in, or packed with, equipment), flammable fluid, mailwith the exception of dry ice used to cool e.g. vaccines (under conditions agreed with the EASA); inside the Storage Containers” or alternatively, Airbus would recommend clarifying the carriage of dry ice in a Means of Compliance Section of the Special Condition SC-D25.855-01.	Recommended	Not Accepted	The special conditions address fire protection aspects of the design of the storage containers. The transportation of dry ice inside the storage containers is not allowed by special condition 1 and would require the development of dedicated special conditions and related means of compliance. As a consequence, no change will be introduced to the special conditions.

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4	AIRBUS	Para 3)	Page 2/2	The additional guidance should provide clarification on standards or conditions that would be acceptable to EASA to meet the objectives set in 3).	A means of compliance section in the Special Condition SC-D25.855-01 that clarifies how to demonstrate 3) would be useful.	Recommended	Partially Accepted	EASA has developed a means of compliance with the proposed special conditions. However, the means of compliance developed by EASA are not subject to public consultation.
5	AIRBUS	Para 1)	Page 2/2	Additional limitations may be needed (like the conditions under which dry ice may be carried, ventilation settings in case of fire - if not already covered by the existing abnormal procedures,etc).	To add new Paragraph 1) f. as follows. f) additional limitation arising from the particular design / type of operation.	Recommended	Partially Accepted	EASA agrees that the change suggested by the Commenter in the suggested resolution field is relevant to the installation under discussion. However, special condition 3 requires that the storage containers must contain fires likely to occur based on the operating limitations specified in special condition 1, so that a cargo fire event will not prevent continued safe flight and landing. In order to demonstrate compliance with special conditions 3, the applicant has to determine if additional operating limitations and emergency procedures need to be introduced to ensure continued safe flight and landing in case a fire develops inside a storage container. As a consequence, no change will be introduced to the special conditions.
6	Dassault Aviation	Special Condition		The “fare paying passenger” consideration should not be considered in the Part21 design scope but should be part of operational discussions.		Choose an item.	Not Accepted	According to CS 25.855(a) each cargo or baggage compartment not occupied by crew or passengers must meet one of the class requirements of CS 25.857. However, the storage containers addressed by the proposed special conditions do not meet any of the cargo compartment classes definitions specified in CS 25.857. Considering the specificities of the design of the proposed Storage Containers, EASA has determined that the approach to be used to control fires likely to occur inside the Storage Containers can only be based on fire containment through oxygen starvation. Operating limitations in the AFM are required in order to reduce the level of severity of the fires likely to occur inside the Storage Containers. It must be noted that the level of safety achieved through the proposed fire containment approach is not considered by EASA sufficiently high to allow fare-paying passengers in the cabin, when the Storage Containers are loaded. This is mainly due to the limitations intrinsic in the test methodology based on which fire containment capability is demonstrated. In fact, fire containment is demonstrated with a specific definition of the fire load, which is consistent with the limitations specified in the AFM, but cannot be representative of all combinations of cargo items that may be transported in the Storage containers based on the above-mentioned AFM limitations. It must be noted that with Amendment 3 of CS-25 EASA has deleted the Class D cargo compartment definition from 25.855 and 25.857, following accidents that have clearly shown the limitations that are associated to the use of fire containment approach as sole means of control of a cargo fire. EASA has also considered the requirements applicable to freighter aeroplanes equipped with Class E cargo compartments, in for which the transportation of cargo is incompatible with transportation of passengers (ref. CS 25.857(e)). Considering that for the proposed Storage Containers installation the only means to contain the fire is based on passive fire containment, and that the design of the storage containers does not allow access to their content to perform fire-fighting through the discharge of the content of a handheld fire extinguisher, EASA has determined that transportation of fare-paying passengers is not compatible with the level of safety achieved with the proposed design.