

MINUTES OF MEETING
Special TAG Meeting on cabin crew and cabin/passenger safety
15 April 2015
Cologne, EASA premises, Room 04.049

Organised by

Flight Standards Directorate, Air Operations Department, Air Operations Regulations Section (FS 2.2)

List of Participants

Attendees	Members and appointed experts of OPS & FCL TAG	
	EASA	
	Daniela Defossar	(DDE)
	Betty Lecouturier	(BLE)
	Lia Calleja-Barcena	(LCB)
	Anastasios Pavlopoulos	(APA)
	Adina Szonyi, partially	(interim secretary)

AGENDA

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Related Links/Documents:

Agenda and minutes will be uploaded on CIRCA BC and published on the EASA website.

1. Welcome and introduction

Presented by: Daniela Defossar (DDE)

The meeting started at 9:00 a.m.

2. Adoption of the agenda

Presented by: Daniela Defossar (DDE)

A new item was proposed: clarification by the EASA representative of the Standardisation section on the continuous monitoring approach.

Agenda was adopted.

There were no questions related to the workshop on cabin crew and cabin/passenger safety of 14 April 2015.

3. Child Restraining Systems (CRS) challenges

Presented by: Martin Maurino, ICAO

Martin Maurino gave a presentation on the on-going work completed by the ICAO Cabin Safety Group as follows:

The discussion on the SARPs was postponed and it was decided to issue, for the moment, only Guidance Material (GM). The content of the guidance covers definitions, model regulations, sample SOP, training, information to passengers, etc.

So far, there was consensus about the infants/children definitions, the suitable and unsuitable CRS types, the use of scientific studies regarding what is not suitable for the lap, and the criteria for the CRS use.

Agreement was achieved on the content of the CRS policy and the approval of the different CRS types, the policies on acceptance and refusal, the location in the cabin and special situations. Operators' SOPs on CRS had also been agreed upon, that shall have as minimum an overview of the use of CRS with an operator, the crew duties, passenger management, etc.

However, the following issues have not yet been agreed on:

- The use of supplemental loop belt;
- Managing international operations/interlining;
- CRS use vs. child transition to adult seat belt (there are problems with defining which children should be in a seat or CRS);
- Accompanying parent or guardian requirements/ratios (how many children); the main issue is how many infants per parent/guardian can be taken on board.

An unedited draft release is scheduled for September 2015. The discussion on SARPs will be included in the ICSG/8 in Oct. 2015.

Q&A

Infant sling is a pouch, a piece of cloth or similar, in which the baby can be carried. Loop belt cannot be recommended as some States have forbidden it, but it cannot be forbidden either as some operators would then offer no protection. Studies have been done for the lap holding in middle rows and the baby sometimes flies over the seat in front in case of rapid deceleration.

Concerning the determination of the minimum cabin crew, one NAA indicated requiring an evaluation test that is operational (requiring operators to do a partial demonstration of an evacuation), and it is on top of the manufacturer's test which is done during the certification. The two perspectives, Certification and Operations, are not linked in the US; conversely, in Europe the operator is required to take into account the information from the certification to determine the procedures and minimum crew, etc. This is why historically it is not mandatory in Europe to require an additional evacuation test by the operator. Boeing and Airbus have a



different approach. One looks only into the 90 seconds, while the other looks also into operational aspects and procedures. The manual will show that the certification exercise is different from the operational exercise; the second is to prove that the procedures work, although the second can also be substituted with data analysis. One MS said they required this additional test because they found out during the inspection that in some cases the procedures needed to be improved (commands too long, etc.). In Europe, whenever there is a change, it is coordinated with Certification.

The Cabin Safety Network with NAAs was set up by Dagmar Dostalíkova EASA. Information will be circulated after the ICSG meeting.

Conclusions/Actions:	Dagmar Dostalíkova (DDO) to keep the Cabin Safety Network informed about the topics and progress in the ICAO ICSG.
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4. Topics suggested by TAG members

Presented by: All

4.1 Credit of Initial training from TCO

At this time, there is no provision in the rule to accept it. It could be considered in the future, should enough data and proof be provided to show that the training completed by the TCO fully complies with the Air OPS rules.

4.2 AMC/GM on the minimum number of hours for initial training

Several MS stressed that there is a need to specify a minimum number of hours for the initial training.

EASA highlighted that the number of hours is not the only criteria to take into account. The training duration may also be impacted by the ratio trainee/trainer and the training material, by what is done during training, etc. The current policy is to have a performance based approach.

The operator provides the other training required by Air Ops rules such as aircraft type specific and recurrent training and is responsible to ensure the competence of the cabin crew and this has to be checked at the end of each training. Perhaps GM could be envisaged on whether there would be some factors affecting the number of hours that operators should consider for the training. MS are responsible to approve training and procedures.

NAAs also stressed that something to be studied is how to approve training organisations. MS would like to accept training provided by organisations approved by other MS. At this point, MS can only approve training organisations in their territory, and they can only approve other training organisations, which are part of the training organisation having its place of business in the MS.

Regarding approval of training organisations, EASA does not have a mandate to regulate it. But a voluntary system could be set up, with a minimum set of standards to approve the training organisations so that it would be easier to accept the approval of training organisations from other MS. EASA cannot take the lead, but it will be discussed in a separate meeting among MS next month.

Conclusions/Actions:	EASA to review the issue of minimum number of hours for the training, considering criteria that may impact on the number of hours required to complete the initial training, hence this being dependant on different factors.
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4.3 Qualification of Senior Cabin Crew Members (SCCM)

Regarding the SCCM, the suggestion is to have an appropriate minimum number of flying hours, rather than one year of experience. There was a long discussion but no alternative solution satisfying everyone. The suggestion is to have 500 hours. "One year of experience" should be interpreted as "one year of operational experience", not necessarily referring to one calendar year. It is suggested to clarify the rule in this sense,



although the number of flying hours would be good indication too.

If this requirement is going to change for the SCCM, the same change should be made for new cabin crew members, where the reference is made to “3 months of experience” – it should also be “operational experience”.

Action on EASA to add this to the list of rules requiring review.

One MS suggested having a requirement that the operators have an equivalent of a post holder for cabin crew operations, responsible for cabin crew and cabin safety issues. The argument was that implementation of Subpart CC requires specific focus and knowledge on cabin crew issues. It was suggested that this might be a management system issue of particular operators. In principle, the person responsible for cabin operations is the postholder flight operations while the postholder training is responsible for all crew training. Another MS suggested that such a requirement could be covered by ORO.AOC.135, requiring the operator to have sufficient supervisory personnel.

EASA answered that the rules follow a non-prescriptive approach, as more flexibility was required by the MS themselves. Flexibility also means responsibility: the power to deny somebody who has no capacity for a certain job. Then NAAs might need to require that the operators adjust their management system.

It is suggested that the MS having problems in this respect send a proposal to EASA. MS could even collaborate to bring forward a consolidated position from the MS.

In order to amend a rule or to create a new one, the Agency needs the feedback and suggestions of the MS.

Post-meeting note: The MS further reviewed its proposal for a cabin crew postholder and informed EASA that it would not pursue the idea further.

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| Conclusions/Actions: | <ol style="list-style-type: none">1. EASA to clarify what is meant by “one year experience” for the SCCM in order to solve the difficulty that MS have in implementing and enforcing these rules.2. EASA to add ORO.CC.205(c)(2) to the list of rules requiring review to ensure consistency with the new AMC on SCCM. |
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4.4 Training certificates

One MS proposed to amend the rule so that the training certificates should be given to the individual (CC member), and the CC should be obliged to provide a copy to the operator.

EASA replied that the CC attestation is issued to the individual, as a personal document that belongs to the holder. Other training records remain with the operator who is obliged to provide a list of trainings with the validity date. There are currently no provisions for operators to credit all other training records from another operator. It is up to each individual to request detailed training records from the operator and the operator is obliged to provide them. However, it is not something systematic; the operator provides the training records only on request. It is difficult however for the individuals to request these certificates from the operator, especially if the employer does not exist after several years. CC.GEN.030 initially stopped after “qualifications”. The EASA Committee added that the training records could be kept by the operator and provided upon request of the holder. The intention was to give flexibility. Perhaps based on experience it should be considered for revision.

EASA could change the rule to have a similar approach to the training records as to the CC attestation.

4.5 Hygiene and Disinfection

All these aspects are not within the EASA remits and therefore cannot be regulated by EASA. It is under the scope of the health authorities and depends on the country of destination.



4.6 Minimum number of cabin crew for complex aircraft with less than 20 passenger seats

If a complex aircraft has 19 seats or less, normally no cabin crew is required. However, there might be a need to carry cabin crew as established during the certification process. For each certification configuration, the minimum CC number should be mentioned in the TCDS, STC or in another document. However, it is difficult to find those numbers. EASA Certification is working with the manufacturers to make these numbers more visible in the Certification documentation, namely in the type certificate data sheet (TCDS).

EASA reiterated the proposal made in the last TAG meeting to have a bilateral meeting with any NAA on their request, to answer questions.

EASA also asked for feedback from MS on implementation issues relating to Part-CC and Subpart ORO.CC. It should be sent to EASA within the next 3 weeks. EASA will then evaluate the issues and decide on further rulemaking action.

Conclusions/Actions: MS to send feedback on implementation issues to EASA by 8 May 2015.

5. EASA updates

Presented by: EASA

EASA update on:

- Fast track procedures concerning access to infant life jackets
- SIB 2014-029 on minimum CC

Access to the infant life jackets

The change related to the infant life jackets was initially considered to be solved through a fast-track procedure – it turned out to bring out different views and important consequences. The conclusion was to allocate more time for this issue and no longer to be addressed via a fast-track procedure, but via the normal rulemaking process. This will also be presented in the RAG meeting in April. In the meantime, EASA will exchange opinions with the interested SSCC members in a webex conference for alternative options (16 April) and will then decide how to proceed.

Today there are 2 different procedures being applied:

1. To distribute the INF life jackets before the flight, so the adult has the infant life jacket – this is compliant with the rules.
2. To distribute it only in case of emergency – not compliant, as they cannot be distributed during an emergency.

One MS suggested having an appropriate briefing to passengers. However, at ICAO level, there is no agreement on this point. Another MS informed about an operators procedure to keep track of the seats with INF life vests, then on landing, the infant life vests are counted.

One economic aspect is that when distributing the infant life jackets before take-off, they are damaged, stolen, etc. Another aspect is that some aircraft are not equipped with seat pockets, so there is a storage problem.

MS reiterated that the distribution of INF life jackets in case of emergency is not considered providing the appropriate protection to infants nor is it compatible with the crew workload in such situations.

SIB 2014-029 on minimum CC

This issue had been discussed during the workshop on cabin crew and cabin/passenger safety the day before. In short, some operators stated that in the past some aircraft types were certified with less CCMs than specified in this SIB, then EASA should accept it as such, as being entitled to grandfathering. Elements recently



received from a TCO holder are being assessed by Certification, in order not to have contradictions between the Certification and the OPS requirements.

Also, some operators stressed that the SIB was not the appropriate tool to address this, but rather an AD or Certification Memo.

EASA will finalise the revision of the SIB as soon as this aircraft analysis and the consideration of the most appropriate tool to be used are completed. MS and interested SSCC members will be consulted on the draft revised version via CIRCA BC.

Conclusions/Actions: EASA to review documentation received from the TC holder and finalise the revision of the SIB.

6. Any other issues

Presented by: Anastasios Pavlopoulos (EASA); All

Continuous monitoring approach and data collected by EASA

It is the EASA obligation (Reg. (EC) No 216/2008, Reg. (EU) No 628/2013) to plan the Standardisation visits and measure how confident the Agency is in the capability of the Competent Authority (CA) to execute their tasks. The Agency uses a software for this.

EASA uses major sources in this model. When planning the S-visits, there are several indicators to be considered, among which:

- NAAs indicators (regional offices, staffing, implementation of the SSP),
- follow-up indicators: how fast the CA reacts to the correction plan, undertaking the non-compliances;
- activity indicators: volume of the industry, how many AOC holders, how many manufacturers they have in their region,
- SAFA indicators,
- Other indicators: political stability, ICAO performance, financial issues of the country

The perception of the inspectors, their feedback and experience from the field are also being considered.

The frequency of the inspections: visits can be delayed to one CA if there are less risk indicators.

The model is being run several times per year, the most important one is in May (others are in March and autumn).

AOB

One MS asked whether they should impose operators to allocate the seats on the overwing Emergency Exits to passengers and not keep them blocked. A safety directive might solve the issue.

EASA answered that the Agency had been tasked by the EC to change the rule accordingly. The draft text would be included in the NPA to RMT.0516 and was sent to the Cabin Safety network for consultation.

ICAO added that there would be a chapter on overwing emergency exits in the manual on which they started to work. In the US, the emergency exit seats are sold as premium seats. Is there a rule in Europe to regulate this? EASA confirmed that currently there is no rule on this. One MS answered that it depends on the operator. It is also not mandatory to brief the passengers. In another MS, operators allocate those seats to deadhead crew or other crew members.

One MS asked whether there was any recommendation on who could perform line checks – senior cabin crew in addition to the minimum required CC or it could be performed while on duty. There were several answers from other MSs: for some, it was an additional crew to perform the line check; for others, line check was not necessary done by a senior crew member. EASA answered that a check has to be performed by a qualified cabin crew member (a crew member competent for that checking activity). It is not specified how. It is a



transposition from EU-OPS.

One MS reiterated the suggestion to address any future RMT under an integrated approach: rather than putting bits and pieces in small individual expert teams, it is better to have a strategy and a master plan.

7. Conclusions of the meeting and closing

Presented by: Daniela Defossar

DDE summarised the discussions:

1. MS to send their feedback on implementation issues related to Part-CC and Subpart ORO.CC to EASA by 8 May (feedback, suggestions on what should be amended and how).
2. Common rules for training organisations – MS to discuss this in their next meeting. EASA has no legal mandate to do so; it needs the MS suggestions.
3. Rule changes that EASA should consider: GM on how to determine the minimum number of hours necessary for completing the required syllabus when the operator develops a training course.
4. EASA to review the 1-year of experience for SCCM and extend it to the new CC – clarify the intent of the rule text.
5. Assess the paragraph on the unforeseen circumstances as relevant to the SSCM against the new AMC/GM.
6. Discuss CC.GEN.030 – training records should be made available to the CC members.
7. Inform TAG members on the SIB draft.
8. EASA is available for bilateral discussions with the NAAs.
9. Dagmar will inform the TAG group (CC experts) on the outcome of the ICAO group and the procedures on CRD when she is back.

DDE thanked the participants for attending the meeting and contributing to the discussion. The meeting closed at 13:00 on 15 April 2015.

MoM Distribution:

OPS TAG, SSCC members, experts and observers

MoM prepared by	Adina Szonyi	01.06.2015
MoM reviewed by	Betty Lecouturier, Daniela Defossar	02.06.2015

