

Airbus comments for EASA on:



European Aviation Safety Agency

28 Sep 2009

ADVANCE NOTICE OF PROPOSED AMENDMENT (A-NPA) No 2009-10

"Cabin Air Quality onboard Large Aeroplanes"

<http://www.easa.europa.eu/rulemaking/docs/npa/2009/A-NPA%202009-10.pdf>

The comment from Airbus is (among comments of many others) included here:



European Aviation Safety Agency

28 May 2011

**COMMENT RESPONSE DOCUMENT (CRD)
TO ADVANCE NOTICE OF PROPOSED AMENDMENT (A-NPA) 2009-10**

"Cabin Air Quality onboard Large Aeroplanes"

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Airbus comments on page 45 to 46:

- In ... A-NPA 2009-10, EASA compiled an excellent and comprehensive review of the technical and historical background on cabin air quality. It is stated that **cabin air quality is excellent on modern large airplanes**. Airbus can fully assent to this statement, which is supported by numerous scientific publications.
- An appropriate bleed air quality is prerequisite for cabin air quality. Consequently respective **regulations for Air Quality** on European level **can be found in CS 25, CS-E and CS-APU** ... Furthermore a more general term **requires the air to be free from harmful or even hazardous concentrations of gases and vapours**.
- In order **to define an appropriate air quality, harmonized standardization has been made** in the United States and on European level for the aircraft environment specifically. Based on specific marker compounds guidelines to determine appropriate quality are provided for example by **SAE ARP4418** (Rev. A) and **EN4618** for bleed and cabin air respectively.

- Based on the EASA interrogation of the UK and ICAO databases **there seems to be no evidence for a serious safety risk by degradation of air quality by defects in engines or APU. Problems**, which occurred **on specific airplanes** obviously **could be** appropriately identified and **corrected** by relevant measures.
- Independent research by the UK Committee on Toxicity has also shown that based on the available evidence **no conclusive relation between cabin air contamination and long term health effects can be drawn.**
- In absence of any evidence for a serious safety risk or ill-health effects caused by cabin air, Airbus cannot support a further prescriptive amendment. Current certification specifications are conclusive on cabin and bleed air quality and large passenger aircraft have proven the technical ability to provide unobjectionable air to passengers and crew. **Airbus especially cannot recommend to EASA requiring additional technical solutions, which might implicate additional risks, without appropriate justification.**