EASA

Comment Response Tool

Title	Cabin Air Quality onboard Large Aeroplanes
NPA Number	A-NPA 2009-10

UK CAA (UK CAA, European.Affairs@caa.co.uk) has placed **2** reactions on this NPA:

NPA Page(s)	Reaction to	Reaction	Attachments
0	(general reactions)	**Page No:** 5 **Paragraph No:** 10.1 b; A study on chemical substances toxicities in aviation oils and hydraulic fluids. 2nd sub-paragraph: *"The study should consider liaising with the oil manufacturer NYCO who has already done a study on organo-phosphates toxicity and identified less toxic variants"* **Comment:** Any study must be carried out in a manner that is transparent, scientific and not open to accusations of bias. While the results of NYCO's studies may be relevant as part of a comprehensive literature review, it would be inappropriate to liaise specifically with a single oil company. Technical / unpublished studies by oil and other companies should be evaluated where appropriate, as was done in the UK COT report in 2007. **Proposed Text:** Delete this paragraph or replace with "The study should liaise with oil and other relevant companies / organisations to identify and evaluate technical or unpublished studies, as well as evidence published in the scientific literature".	
0	(general reactions)	**Page No:** 6 **Paragraph No:** 10.1 c; Definition of medical tests to be carried out after a fume incident. Note: *"On this subject, a "guide for health care providers" ..... makes recommendations regarding treatment methods."*	

NPA Pag (s)	Reaction to	Reaction	Attachments
		Comment: Although funding for the project was provided by the FAA Office of Aviation Medicine as part of the OHRCA-ACER collaborative project, review indicates that it is not an objective, evidence based document. In particular, the document focuses on the role of TCP and describes the resultant chronic health effects and their treatment, despite the absence of any evidence that these exist. A review of the references used also indicates a strong bias towards those representing a particular view of the issues. Having accepted that a causal relationship has not been established between reported health symptoms and oil/hydraulic fluid contamination, the Agency should not endorse guidance for health care providers that clearly implies that a causal relationship exists. **Proposed Text:** Delete this text.	

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