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Title	Carriage of Special Categories of Passengers (SCPs)
NPA Number	NPA 2014-01

UK CAA (European.Affairs@caa.co.uk) has placed **20** unique comments on this NPA:

Cmt	Segment description	Pag	Comment	Attachm
135	(General Comments)	0	**Page No:** N/A **Paragraph No:** Various **Comment:** UK CAA suggest the terminology should be reviewed for consistent use of passenger classification in all AMC and GM. Examples include: AMC4 CAT.OP.MPA.155(b) refers to 'children up to the age of twelve years' GM1 CAT.OP.MPA.155(b) refers to 'children of less than 12 years of age' and GM2 CAT.OP.MPA.155(c) refers to 'children up to 12 years old' **Justification:** To align with Annex I – Definitions Used in Annex II-V – Air Operations regulation. **Proposed Text:** '(5)(b) child/children … are less than 12 years of age'.	
136	2.5 Open questions to stakeholders	20 - 22	**Page No:** 20 **Paragraph No:** 2.5 - Question 1 – on briefing of safety assistants for stretcher occupants. **Comment:** UK CAA fully supports.	
137	2.5 Open questions to stakeholders	20 - 22	**Page No:** 20 **Paragraph No:** 2.5 - Question 2 – on a maximum number of SCPs on board. **Comment:** The UK CAA does not consider there to be a necessity to define a further limit. The criteria in CAT.OP.MPA.155 is considered to be suitably robust. **Justification:** Regulation (EC) 1107/2006 concerning the rights of disabled persons and persons with reduced mobility (PRMs) when travelling by air ensures that PRMs have the same opportunities for air travel as those of others, in particular that they have the same rights to free movement, freedom of choice and non-discrimination. A new rule here would potentially restrict access to flights for many PRMs creating barriers to access, particularly in	

			regard to group travel involving a number of PRMs travelling together. It might also result in different policies adopted by different airlines which would undermine the principle of consistent standards of accessibility set out in Regulation (EC) 1007/2006.	
138	2.5 Open questions to stakeholders	20 - 22	**Page No:** 21 **Paragraph No:** 2.5 - Question 3 – on proposed AMC for a safety assistant. **Comment:** UK CAA fully supports. There is sometimes inconsistency with airline policies and practices on this. However, we would suggest that more than one safety assistant may be necessary, for example, when lifting is required. This would align with UK Department for Transport's 'Access to Air Travel for Disabled Persons and Persons with Reduced Mobility' - Code of Practice. Ref 3.14. **Justification:** This would provide PRMs with more certainty about when they can travel alone and when they must have a carer. It would also provide airlines with more certainty in making decisions about when to require carers.	
139	2.5 Open questions to stakeholders	20 - 22	**Page No:** 21 **Paragraph No:** 2.5 - Question 4 – on definition of a safety assistant. **Comment:** A minimum age limit of 16 years has the potential to be overly restrictive and not take into consideration the specific needs of the SCP. The UK CAA proposes a minimum age of 12 years. See also UK CAA comment suggesting revision to the proposed text for the definition of a safety assistant under 'Definitions – New Guidance material including a new definition'. **Justification:** Annex 1 of the Air Operations regulation defines an adult as a person 12 years and above. The specific needs of the SCP should be considered when determining the suitability and number of safety assistants required.	
140	2.5 Open questions to stakeholders	20 - 22	**Page No:** 21 & 22 **Paragraph No:** 2.5 - Question – 5 alternative means to restrain severely disabled children during flight. **Comment:** UK CAA supports the proposal with the following additional comment/consideration; - *A seat must be provided to ensure compliance with CAT.IDE.A.205 & CAT.IDE.H.205. If a seat is not provided there is potential for the MOPSC to be exceeded.* - *When determining that a child cannot be secured using any other supplementary restraint device that can*	

			reasonably be made available, economic reasons are not considered to be acceptable justification for non provision of such a device by an operator or passenger. **Justification:** Economic reasons are not considered to be justification for permitting multiple seat occupancy for persons with disability aged two years and above. Allowing a child over two to be seated on the lap of a parent may allow some severely disabled children who are 2,3 or even 4 years access to air travel. The additional suggestion that an airline must keep the seat next to the adult free for the child to sit in (if need be) apart from taxi, take off and landing would further increase chances of being able to travel. **Proposed Text:** "ALTERNATIVE MEANS TO RESTRAIN SEVERELY DISABLED CHILDREN DURING FLIGHT (a) It shall only be relied on in respect of children, aged two years or more, who because of physical disability cannot be properly secured in their own seat using the aeroplane safety belt. (b) It shall only be relied on if the operator has satisfied itself that the child cannot be secured using any other supplementary restraint device, support, or comfort aid that can reasonably be made available. Economic reasons would not normally be considered acceptable justification for non provision of such a device by an operator or passenger. (c) The operator must satisfy itself that having regard to the size and weight of the child, the child may be satisfactorily restrained. (d) The operator shall specify in its operations manual which aircraft seats can be used for the purpose of this exemption. (e) The commander shall ensure that the child is restrained by a child-restraint device, e.g. a supplementary loop or other restraint device. (f) The commander shall ensure that a seat or berth is provided for the child. This should be adjacent to the accompanying adult."	
141	3 Proposed amendments — 3.1 Draft EASA Decision proposed changes to ED Decision 2012/015/R — Definitions	23	**Page No:** 23 **Paragraph No:** 3.1 Draft EASA Decisions proposed changes to ED Decision 2012/015/R – Definitions – New Guidance material including a new definition **Comment:** A minimum age limit of 16 years has the potential to be overly restrictive and not take into consideration the specific needs of the SCP. The UK CAA proposes a minimum age of 12 years. Reference to ability to react in an appropriate manner is considered subjective and would be a factor that is difficult to determine and be consistently applied by operators. The specific needs of the SCP should be considered when determining the suitability and number of safety assistants required. **Justification:** Annex 1 of the Air Operations regulation	

			defines an adult as being a person 12 years and above. The specific needs of the SCP should be considered when determining the suitability and number of safety assistants required. **Proposed Text:** "(103) 'safety assistant' means a passenger, accompanying an SCP, who is at least 12 years old and is physically and mentally able to: (a) follow crew instructions; (b) ~~react in an appropriate manner in emergency situations; and~~ (c) assist in an emergency situation or evacuation of the SCP, with specific regard to the individual needs of the SCP."	
142	3 Proposed amendments — 3.2 Draft EASA Decision proposed changes to ED Decision 2012/018/R — Part CAT	23	**Page No:** 23 **Paragraph No:** 3.2 AMC1 CAT.OP.MPA.155(b) Carriage of special categories of passengers (SCPs) - PROCEDURES **Comment:** UK CAA fully supports.	
143	3 Proposed amendments — 3.2 Draft EASA Decision proposed changes to ED Decision 2012/018/R — Part CAT	23	**Page No:** 24 **Paragraph No:** 3.2 AMC2 CAT.OP.MPA.155(b) Carriage of SCPs – BRIEFING OF SCP AND SAFETY ASSISTANT **Comment:** UK CAA fully supports.	
144	3 Proposed amendments — 3.2 Draft EASA Decision proposed changes to ED Decision 2012/018/R — Part CAT — AMC3 CAT.OP.MPA.15 (b) Carriage of special categories of passengers (SCPs) — SCP TRAVELLING WITH A SAFETY ASSISTANT	24	**Page No:** 24 **Paragraph No:** 3.2 AMC3 CAT.OP.MPA.155(b) Carriage of SCPs – SCP TRAVELLING WITH A SAFETY ASSISTANT **Comment:** UK CAA fully supports, however we would suggest that more than one safety assistant may be necessary, for example, when lifting is required. **Justification:** The inclusion of the need for more than one safety assistant better reflects the needs of the SCPs. This is recognised under the current UK Department for Transport Code of Practice 3.14 **Proposed Text:** "SCP TRAVELLING WITH A SAFETY ASSISTANT An SCP should only be required to travel with a safety assistant, when it is evident that the SCP is not self-reliant and carriage could pose a safety risk to himself or herself or other passengers. In some cases more than one assistant may be necessary, for example, where lifting is required. Typically, a safety assistant ~~this~~ will be required ~~the case~~ when the SCP is unable to: (a) unfasten their seat belt, or	

			(b) leave their seat and reach an emergency exit unaided, or (c) retrieve and fit a life jacket, or (d) fit an oxygen mask without assistance, or (e) follow the safety briefing and instructions given by the crew in an emergency situation."	
145	3 Proposed amendments — 3.2 Draft EASA Decision proposed changes to ED Decision 2012/018/R — Part CAT — AMC4 CAT.OP.MPA.15 (b) Carriage of special categories of passengers (SCPs) — CONDITIONS OF SAFE CARRIAGE FOR UNACCOMPANI CHILDREN	24	**Page No:** 24 **Paragraph No:** AMC4 CAT.OP.MPA.155(b) Carriage of SCPs – CONDITIONS OF SAFE CARRIAGE FOR UNACCOMPANIED CHILDREN **Comment:** Para. (a): UK CAA fully supports. **Comment:** Para. (b): The UK CAA does not consider it appropriate for children under the age of 12 years to be separated from an accompanying adult. The UK CAA shares the concern of the rulemaking group on the social, safety and legal consequences of asking a person who has no connection to the child under 12, who is separated from the accompanying adult, to act as a safety assistant. Although deemed outside of the scope of the task, this should be addressed before implementation of the proposed changes. **Justification:** Proposed regulatory changes should not be introduced until the legal requirements (responsibilities and liabilities) and safety implications have been adequately addressed. **Proposed Text:** "(b) Children ~~up to~~ less than ~~the age of~~ twelve years ~~old,~~ should not be separated from ~~the~~ an accompanying adult ~~(s), who are travelling in another cabin class, should be regarded as unaccompanied children,~~ in order to ensure that they are assisted in case of emergency situations."	
154	3 Proposed amendments — 3.2 Draft EASA Decision proposed changes to ED Decision 2012/018/R — Part CAT — GM1 CAT.OP.MPA.15 (b) Carriage of special categories of passengers (SCPs) — SCP BRIEFING PROCEDURE	25 - 27	**Page No:** 25, 26 & 27 **Paragraph No:** GM1 CAT.OP.MPA.155(b) Carriage of SCPs – SCP BRIEFING PROCEDURE **Comment (1):** *Unaccompanied children of less than 12 years* · The UK CAA shares the concern of the rulemaking group on the social, safety and legal consequences of asking a person who has no connection to the child under 12, who is separated from the accompanying adult, to act as a safety assistant. Although deemed outside of the scope of the task, this should be addressed before implementation of the proposed changes and suggests removal of the proposed text. · The UK CAA fully supports seating allocation of unaccompanied children as indicated in GM2 CAT.OP.MPA.155(c) **Justification:** The UK CAA does not consider it	

appropriate for children under the age of 12 years to be separated from an accompanying adult.

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Comment (2):
Parents travelling with infants
The UK CAA believes that the contents of the briefing can be achieved by inclusion in the safety briefing card required by CAT.OP.MPA.170(b).

Proposed Text:
"Information regarding the following should be provided by means of a briefing or inclusion in the passenger safety card; ~~Briefing on~~
· The brace position for adult with lap-held infant,
· ~~Briefing on~~ How to evacuate carrying an infant:
(a) On land, jump on the slide; and
(b) in case of water landing, how to fit and when to inflate infant flotation aid (e.g. life vest, flotation cot)."

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Comment (3):
Stretcher occupant
UK CAA fully supports.

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Comment (4):
Visually impaired passenger
UK CAA fully supports and proposes inclusion of the additional text below.

Proposed Text:
"(h) Operators should consider providing safety information in Braille format."

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Comment (5):
Passenger with disability of upper limbs
Where such a briefing is necessary a passenger would be required to travel with a safety assistant in accordance with AMC3 CAT.OP.MPA.155(b) and proposes the revised text below.

Justification:
An SCP who is not self reliant would be required to travel with a safety assistant if unable to unfasten their seatbelt, fit a lifejacket or fit an oxygen mask.

Proposed Text:
"Brief SCP and safety assistant ~~passenger seated next to SCP~~:
(a) to assist with the operation of their seat belt, if necessary;

			(b) in case of a ditching evacuation, to fit the life jacket on the SCP. (c) in case of decompression, to first put on their own oxygen mask before fitting the SCP's oxygen mask, if necessary." ********** **Comment (6):** *Passenger with disability of lower limbs* UK CAA does not support point (c) **Justification:** Cabin crew may still be required to perform crowd control duties once the immediate cabin area has been evacuated and should only consider assistance when satisfied that they are no longer required to control evacuation from exits for which they are responsible. **Proposed Text:** "(c) that cabin crew can only assist once the ~~immediate~~ cabin ~~area~~ has been evacuated." ********** **Comment (7):** *Passenger with disability of both upper and lower limbs* UK CAA does not support point (a)(2) **Justification:** Cabin crew may still be required to perform crowd control duties once the immediate cabin area has been evacuated and should only consider assistance when satisfied that they are no longer required to control evacuation from exits for which they are responsible. **Proposed Text:** "(a)(2) that ~~the SCP might have to wait for~~ cabin crew ~~as they~~ can only assist once the ~~immediate~~ cabin ~~area~~ has been evacuated."	
146	3 Proposed amendments — 3.2 Draft EASA Decision proposed changes to ED Decision 2012/018/R — Part CAT — GM2 CAT.OP.MPA.15 (b) Carriage of special categories of passengers (SCPs) — MAXIMUM NUMBER OF	27	**Page No:** 27 **Paragraph No:** GM2 CAT.OP.MPA.155(b) Carriage of SCP's – MAXIMUM NUMBER OF SCPs **Comment:** UK CAA considers the GM to be overly restrictive and impracticable for an operator to manage and suggests removal of the proposed text. **Justification:** SCP's who are not self-reliant are required to travel with a safety assistant. The criteria in CAT.OP.MPA.155 is considered to be suitably robust.	

	SCPs			
147	3 Proposed amendments — 3.2 Draft EASA Decision proposed changes to ED Decision 2012/018/R — Part CAT — GM3 CAT.OP.MPA.15 (b) Carriage of special categories of passengers (SCPs) — BRIEFING PROCEDURE IN A PLANNED EMERGENCY	27	**Page No:** 27 **Paragraph No:** GM3 CAT.OP.MPA.155(b) Carriage of SCP's – BRIEFING PROCEDURE IN A PLANNED EMERGENCY **Comment:** UK CAA fully supports.	
148	3 Proposed amendments — 3.2 Draft EASA Decision proposed changes to ED Decision 2012/018/R — Part CAT — AMC1 CAT.OP.MPA.15 (c) Carriage of special categories of passengers (SCPs) — SEATING OF SPECIAL CATEGORIES OF PASSENGERS	27 - 28	**Page No:** 27 & 28 **Paragraph No:** AMC1 CAT.OP.MPA.155(c) Carriage of SCP's – SEATING OF SCPs **Comment:** UK CAA fully supports.	
149	3 Proposed amendments — 3.2 Draft EASA Decision proposed changes to ED Decision 2012/018/R — Part CAT — AMC2 CAT.OP.MPA.15 (c) Carriage of special categories of passengers (SCPs) — SEATING ALLOCATION OF SCPs	28	**Page No:** 28 **Paragraph No:** AMC2 CAT.OP.MPA.155(c) Carriage of SCP's – SEATING ALLOCATON OF SCPs WITH DISABILITY AND/OR RESTRAINT AID **Comment:** UK CAA fully supports.	

	WITH A DISABILITY AND/OR RESTRAINT AID			
150	3 Proposed amendments — 3.2 Draft EASA Decision proposed changes to ED Decision 2012/018/R — Part CAT — GM1 CAT.OP.MPA.15 (c) Carriage of special categories of passengers (SCPs) — GROUP SEATING OF SPECIAL CATEGORIES OF PASSENGERS	28	**Page No:** 28 **Paragraph No:** GM1 CAT.OP.MPA.155(c) Carriage of SCP's – GROUP SEATING OF SCPs **Comment:** Sub-paragraph (a): UK CAA proposes the text is amended as shown below. Sub-paragraph (b): UK CAA fully supports. **Justification:** To facilitate access to exits and toilet facilities (including accessible toilet) the grouping of SCP's is likely to occur. To spread PRMs evenly throughout the cabin could mean that some PRMs might have to be allocated away from the toilet or in seats which are not suitable. It might also prevent a large group of SCPs sitting together. It could also lead to problems if SCPs are asked to move when already onboard and in their seat. This could discriminate unduly against PRMs. It could prevent PRMs from being able to use the toilet onboard which could mean some passengers would be forced to dehydrate themselves or use catheters. Airlines must be mindful not to discourage some PRMs from travelling thus creating a barrier to access. **Proposed Text:** "(a) ~~Group seating of~~ Where practicable, and taking into consideration access to exits and toilet facilities, non-ambulatory SCPs and extremely obese passengers ~~should be avoided. They~~ should be seated throughout the cabin to ensure that each SCP is surrounded by the maximum number of passengers capable of assisting in case of an emergency. (b) If non-ambulatory SCPs cannot be evenly distributed throughout the aircraft cabin, the operator should establish procedures to mitigate the increased safety risk, such as seating of passengers capable of assisting in case of an emergency, additional briefings, or training of cabin crew."	
151	3 Proposed amendments — 3.2 Draft EASA Decision proposed changes to ED Decision 2012/018/R — Part CAT — GM2 CAT.OP.MPA.15 (c) Carriage of special categories of	29 - 30	**Page No:** 29,30 **Paragraph No:** GM2 CAT.OP.MPA.155(c) Carriage of SCPs – SEATING ALLOCATION OF SCPS **Comment (1):** *Unaccompanied child* The UK CAA fully supports with the following amendment. **Proposed Text:** "The seating of unaccompanied children of less than 12 years".	

passengers (SCPs) — SEATING ALLOCATION OF SPECIAL CATEGORIES OF PASSENGERS

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Comment (2):
Passengers travelling with children up to 12 years old
The UK CAA fully supports with the following amendment.

Proposed Text:
"Passengers travelling with children less than ~~up to~~ 12 years old"

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Comment (3):
Extremely obese passengers
The UK CAA fully supports.

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Comment (4):
Passenger with physical disability of the upper limbs
It is unclear why a person who does not require a safety assistant should be allocated a seat so that visual and audible communication can be established with the cabin crew and suggests removal of the proposed text.

Justification:
A person who does not require a safety assistant is considered to be self-reliant.

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Comment (5):
Passenger with disability of lower limbs
UK CAA fully supports.

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Comment (6):
Passenger with disability of both upper and lower limbs
UK CAA fully supports.

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Comment (7):
Mentally impaired passenger
It is unclear why a person who does not require a safety assistant should be allocated a seat so that visual and audible communication can be established with the cabin crew and suggests removal of the proposed text.

Justification:
A person who does not require a safety assistant is considered to be self-reliant.

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Comment (8):
Visually impaired passenger travelling with recognised assistance dogs in the cabin

			The UK CAA fully supports with the amendment proposed below. **Justification:** This would align with current requirements and guidance: • ICAO Doc 9984 – Manual on Access to Air transport by persons with Disabilities. Para 8.10 • EC regulation 1107/2006 – refers to recognised assistance dog. • UK DfT Access to Air Travel for Disabled Persons and Persons with Reduced Mobility - Code of Practice **Proposed Text:** ~~*"Visually impaired*~~ *Passenger travelling with a~~n~~ recognised assistance dog~~s~~* Suitable arrangements should be made between the passenger and operator in advance of a flight where a guide dog or recognised assistance dog is to be accommodated. A suitable restraint harness should be provided by the owner to secure and restrain the dog during taxi, take-off, landing, and turbulence. In cruise, it is acceptable for the dog to be subject to less restraint. Operators should provide seating with sufficient space so that the dog can remain on the floor at the passenger's seat, this may require an extra seat provided by the aircraft operator in order for there to be enough floor space for the animal to lie down, without discomfort." ********** **Comment (9):** *Stretcher Occupant* The UK CAA proposes the text should be amended as proposed below. **Justification:** Compliance with the applicable airworthiness requirement should be given priority. **Proposed Text:** ~~"Alternatively, t~~ The stretcher should be installed where it can demonstrate compliance with CS.25.562(b), (c)(7), (8). Alternatively ~~T~~ the stretcher should be installed behind a cabin monument that is capable of restraining the stretcher from moving throughout the cabin should it break loose. ~~Alternatively, the stretcher should be installed where it can demonstrate compliance with CS.25.562(b), (c)(7), (8).~~ Stretcher installation should be as close to ~~the~~ a floor level non-overwing exit as is practicable, preferably as close to a required cabin crew station with an adjacent seat for one designated safety assistant."	
152	3 Proposed amendments	31	**Page No:** 31	

	— 3.3 Draft EASA Decision proposed changes to Decision 2012/017/R — Part ORO — AMC1 ORO.CC.140 Recurrent training — TRAINING PROGRAMMES		**Paragraph No:** AMC1 ORO.CC.140 Recurrent Training **Comment:** UK CAA fully supports.	
153	4 Regulatory Impact Assessment (RIA) — 4.6 Passenger Briefing — 4.6.2 Safety impact	46 - 47	**Page No:** 46 **Paragraph No:** Para 4.6.2.1, SCP briefing procedures, last sub-paragraph **Comment:** The UK CAA shares the concern of the rulemaking group on the social, safety and legal consequences of asking a person who has no connection to the SCP to act as a safety assistant in the event of an emergency. Although deemed outside the scope of the task, this should be addressed before implementation of the proposed changes to the regulations. **Justification:** Proposed regulatory changes should not be introduced until the legal requirements (responsibilities and liabilities) and safety implications have been adequately addressed.	

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