





SUMMARY OF CONSULTATION



CAAP 253-02 v2.0 - Passenger safety information: Guidelines on content and standard of safety information to be provided to passengers by aircraft operators



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Overview

CASA published the proposed CAAP 253-02 v2.0 — *Passenger Safety Information: Guidelines on content and standard of safety information to be provided to passengers by aircraft operators* — on the CASA website from 19 October to 2 November 2018 and invited industry and the public to comment on the proposals outlined. The consultation period has now closed. CASA has reviewed each comment and submission and a summary of the feedback is provided below.

About this consultation

The primary purpose of the consultation was to introduce a new section into the CAAP for charter balloon operators. Charter balloon operators regularly fly balloons carrying up to 24 passengers and specific passenger safety information for balloon operators was not previously included in the CAAP. CASA considers that a comprehensive passenger safety briefing is essential. It is a requirement of s 14 of CAO 20.11 that all passengers on an aircraft be orally briefed about safety processes before a flight commences.

Concurrent with the consultation, a peer review of the CAAP identified that it was appropriate to update certain references and incorporate other minor style amendments and that similar guidance material for helicopter operations should also be included.

Respondents

Five responses were received one of which was from a regular public transport (RPT) operator and one from a CASA employee. Two respondents consented to their response being published on the CASA website. The other three were from private individuals who did not want their responses published.

There were no objections to the specific updated information in the CAAP. However, there were suggestions that CASA could clarify certain terms, and there were concerns expressed about passenger behaviour during emergency evacuation procedures on aircraft.

Summary of feedback

Comment

One respondent suggested that the term 'seats' in relation to balloons might be confusing as the respondent did not think balloons had seats.

CASA response/action

CASA considered this suggestion and notes that the term 'seats' is generally recognised by hot air balloon operators to mean the passenger standing position in a balloon basket. However, some balloons do now have seats that are used during the landing phase and an addition to the recommended pre-flight briefing for balloon passengers will be made to include balloons with seats.

Comment

A respondent suggested the provision of additional clarity in relation to handholds and the reason for knee flexing by balloon passengers on landing.

CASA response/action

CASA agrees and will amend the recommended pre-flight briefing section for balloon passengers.

Comment

An RPT operator commented that there is no evidence for an internationally agreed passenger brace position that works for all persons in all situations. It was suggested that Cabin Safety Bulletin No 6 (brace position) be withdrawn until further consultation with industry can be completed.

CASA response/action

Cabin Safety Bulletins (CSB) are a subset of CASA's primary guidance material (Advisory Circulars and Civil Aviation Advisory Publications) that are limited to communicating key issues and topics of interest and are used as a mechanism to provide up to date information/guidance. They are not mandatory.

In 2015, the International Civil Aviation Organization (ICAO) began to develop guidance material on information and instructions for passenger safety, which included a review of [brace positions](#). This review was carried out with the goal of developing internationally harmonized recommendations on the subject, including instructions for Civil Aviation Authorities on the passenger and cabin crew brace positions.

An ad hoc group of the ICAO Cabin Safety Group (ICSG) was formed (known as the ICSG Sub Group) where certain common elements of a safe [brace position](#) for forward-facing passenger seats in economy class were identified and discussed. An in-person and web-based meeting was held in England on 21st November 2016, at the Royal College of Physicians, London. One of the goals of the meeting was to determine how to plan and undertake further research in order to produce the necessary evidence upon which recommendations about the brace position could be based.

Continuing review of the evidence and further discussions led the ICSG Sub-Group to determine that there was no single, completely evidence-based and internationally agreed, passenger brace position to reduce an aircraft occupant's risk of injury during an aircraft crash sequence. Due to the lack of agreement on the best evidence, the ICSG Sub-Group was unable to recommend to the ICSG one single brace position for passengers seated in forward-facing economy class seats.

Cabin Safety Bulletin number 6 acknowledges that although extensive research has been conducted, no single brace position has yet been determined due to the variation in passenger characteristics and abilities, in seat class characteristics, seat pitch and direction of travel along with restraint design and airbags. The bulletin also acknowledges that research has determined that brace positions may need some adjustment due to the evolution of seat technology. The

brace positions referred to in the bulletin are referenced as examples only, based on the iBrace¹ research. The bulletin seeks to highlight to operators:

- the contemporaneous research undertaken by SMEs across several disciplines worldwide
- that as part of the operators' safety management system, it could be appropriate to conduct a review of existing practices against recently published information to ensure their published brace positions remain suitable to the aircraft types within their fleet

CASA considers that the bulletin is appropriate, and no change is to be made at this time.

Comment

A respondent suggested that emphasis should be placed on the authority of cabin crew, the possibility of passenger's shoes causing a tripping hazard, and suggested that there be rules for who sits in the exit rows.

CASA response/action - 1st item

Multiple sections of the CAAP already discuss or outline various requirements in this area.

- Section 3.3.1 (Supplemental information) references the requirement for passengers to abide by crew member instructions.
- Section 4.2 references passenger compliance.

Additionally, s 24 of the Civil Aviation Act 1988 contains an offence related to an act that interferes with a crew member in the course of the performance of their duties or threatens the safety of an aircraft or of persons on board an aircraft.

Elements of the proposed future Australian aviation rules related to this matter include:

- Proposed subregulation 91.580 requires passengers on board an aircraft to comply with instructions from cabin crew members.

No changes to be made in relation to the CAAP at this time.

CASA response/action - 2nd item

No regulatory requirement exists around wearing footwear during an evacuation.

¹ The International Board for Research into Aircraft Crash Evaluation (iBrace) was also founded on 21 November 2016 by a group of subject-matter experts in aviation (cabin safety and accident/incident investigation), engineering (sled-impact testing, aerospace materials, lightweight advanced-composite structures, and air transport safety and investigation), clinical medicine (specifically, orthopaedic trauma surgery and anaesthesia), and human factors. These experts are associated with organizations that include the [Civil Aerospace Medical Institute](#), USA (CAMI); [Cranfield University](#), England; GRM Consulting Ltd., England; Spire Liverpool Hospital, England; [TUV Rheinland](#), Germany; the [University of Calgary](#), Canada; the [University of Nottingham](#), England; and [Wonkwang University](#), Korea.

Internationally, material has been published to suggest that high heels may puncture slides (one example is an article published in Flight Safety Foundation Cabin Crew Safety, Analysis of Evacuation-slide problems calls attention to recurrent issues.²

Part 1 of Annex 6 to the Chicago Convention contains certain provisions outlining the safety related information and instructions that an operator should provide to passengers. The ICAO guidance material on these provisions (Doc 10086 - Manual on Information and Instructions for Passenger Safety) states:

- Section 2.6 (Safety demonstration) para 2.6.3 - that the operator may include as part of the safety demonstration 'the removal of high heeled shoes in an evacuation'.
- Section 3.4 (Passenger safety briefing card) para 3.4.1(g)(6) - that assisting evacuation means, refers to removal of high heeled shoes in an evacuation
- Section 7.3 (Evacuation Commands) - that cabin crew will need to provide additional commands to passengers (e.g. remove high heeled shoes).

'Passenger clothing, health and behaviour' states:

'In the unlikely event of an emergency the clothes you are wearing can be useful in reducing the risk of injury. The following is recommended...remember to remove high heel shoes before evacuating via a slide; keep your shoes on during take-off and landing; closed footwear is the best option...'

Transport Canada Flight Attendant Training Standard³ recommends the removal of high heeled shoes (as applicable to equipment) however does qualify that each operator will develop their own established procedures and commands as required by their operation.

CASA's policy to recommend removing high heel shoes when using the evacuation slide is in line with international practice.

The CAAP will be amended to place a recommendation in section 4.2(g) [evacuation slide use] to remove high heels during an evacuation.

CASA response/action - 3rd item

Part 1 of Annex 6 to the Chicago Convention contains certain provisions outlining the safety related information and instructions that an operator should provide to passengers. The ICAO guidance material on these provisions (the Doc 10086 - Manual on Information and Instructions for Passenger Safety– Chapter 5 Occupancy of Emergency Exit Rows) states that ICAO standard and recommended practices do not address mandatory occupancy of seats at unstaffed exit rows during flight. However, the guidance material does suggest criteria for selecting passengers who may be seated in an emergency exit row (staff or unstaffed) and recommends that operator procedures include methods of ensuring that a passenger's presence at an emergency exit row during an evacuation does not adversely affect the safety of other occupants.

² Flight Safety Foundation Cabin Crew Safety Vol 40 No.3 May-June 2005
(https://flightsafety.org/ccs/ccs_may-june05.pdf)

³<https://www.tc.gc.ca/eng/civilaviation/publications/tp12296-initial4-section4-5542.htm>

It recommends that the passenger in the emergency exit row must be:

- physically capable of operating the emergency exit
- capable of understanding the printed and spoken instructions
- able to determine if the exit is safe to open visually
- have sufficient mobility, strength and dexterity to reach, operate and stow (or otherwise dispose of) the exit hatch if removable
- able to receive aural information from the crew and communicate that information to other passengers orally
- of a minimum age (as established by the state or the operator) to ensure that he/she has the physical, cognitive and sensory capacity to operate the exit
- not responsible for another person as this can hinder the opening of the exit
- not be travelling with any animal in the cabin (service, emotional)
- not have a condition that might cause him/her harm by opening the exit
- not have any other condition that might slow the opening of the exit, the flow of passengers or impede the pathway.

The ICAO guidance material also recommends that the following types of persons should not occupy an emergency exit row seat:

- who do not/will not accept responsibility for the emergency exit
- passengers under escort such as deportees or prisoners.

Finally, the ICAO guidance material recommends that in concert with the factors mentioned earlier, the operator should have procedures in place for ground crew and cabin crew to validate the selection criteria and occupancy restrictions of an emergency exit row (e.g. passenger with physical disabilities, language comprehension, communication abilities).

Elements of current Australian aviation rules related to this matter include:

- ss 3.3 of CAO 20.16.3 – the operator of the aircraft must ensure that exit rows in the aircraft are occupied only by persons who are fully able and willing to assist with access to the emergency exits in the event of an emergency.
- Certain directions that permit a 1:50 cabin crew ration also stipulate conditions upon which passengers are seated at exit rows.

Elements of the proposed future Australian aviation rules related to this matter include:

- Draft AMC 121.260 / GM 121.260 Passengers in emergency exit row seats reflects elements of the ICAO guidance material. This AMC/GM will be further refined as part of the implementation of CASR Part 121.
- Draft GM 135.290-295 Passenger transport operations – obstruction of emergency exits – suitable person defined in Part 1 of the CASR Dictionary. This GM will be further refined as part of the implementation of CASR Part 135.

No changes to be made in relation to the CAAP at this time.

Comment

A respondent suggested there should be fines for people who impeded an evacuation with cabin baggage.

CASA response /action

Section 3.2 of the CAAP (content of briefing) already outlines what to do with cabin baggage/belongings in case of an evacuation and recommends not bringing carry-on baggage to an exit during an evacuation.

Cabin Safety Bulletin No 9 - Management of cabin baggage in an aircraft evacuation contains cabin crew considerations and strategies that can be employed, and this has been referenced under the 'Advisory material' section of the CAAP.

The proposed future Australian aviation rules (proposed subregulation 91.790) makes it an offence for a passenger to not comply with instructions from cabin crew members.

No changes to be made in relation to the CAAP at this time.

Next steps

CASA will add minor clarifying amendments to section 5 (Hot air balloon passengers) and modify the CAAP to recommend that high heels be removed when using escape slides.

We will make all submissions available on the CASA public website unless a respondent has requested that their submission remain confidential. General information about how we consult and how to make a confidential submission is available on the CASA website.

<<https://www.casa.gov.au/rules-and-regulations/landing-page/consultation-process>>