

Regulatory Deviation - Carriage of Cargo in Passenger Cabins

1 INTRODUCTION

- 1.1 BCAA recognises the need to react effectively to the challenges created by international restrictions to the COVID-19 Pandemic, whilst managing related safety risks effectively.
- 1.2 Due to the pandemic and shortage of dedicated freighter aircraft, operators of passenger aircraft have been requested, by local and national governments, to provide transportation means for immediate medical relief supplies. Operators therefore seek to utilise the passenger compartments of their aircraft to accommodate this urgent demand.

2 BACKGROUND

- 2.1 The passenger compartments of large passenger aircraft were not certified to carry cargo and do not therefore comply with the certification requirements for cargo compartments. For this reason, the aircraft do not have the necessary equipment or data supporting the loading, restraint and fire suppression of cargo loaded into these areas of the cabin. Converting these areas for this use requires changes of equipment and data, these changes require Airworthiness approval through modification and Operational Approval
- 2.2 BCAA obligations and responsibilities under ICAO Annex 8 and the AN(OT)O in respect of upholding the standards of the Certificate of Airworthiness continue to apply during this period. BCAA have therefore implemented a regulatory Deviation to OTAR Part 21.73, in this case, to address the urgent need for approval for minor changes to aircraft, to introduce this capability.
- 2.3 The Deviation is published on BCAA website.

3 INSTRUCTIONS

3.1 Application

- 3.1.1 Operators wishing to modify the passenger cabins of their aircraft to carry cargo should seek approval via this Deviation, by making a modification approval submission to their allocated Airworthiness Inspector, in the routine manner on BCAA Form AW220.
- 3.1.2 The modification application should include an Engineering Order from the applicant which addresses the technical requirements of the temporary minor change, applies to seat stowed medical supplies only and contains controls for the airworthiness risks, referencing the cargo restraint method, cargo load limits, reduction of ignition sources, fire detection method, fire suppression equipment.
- 3.1.3 The application should also reference compliance to the statements of 'no technical objection' from the type certificate holder, in respect to the airworthiness of the proposed change;

3.1.3.1 Boeing ref: MOM-MOM-20-0239-08B Dated 08 April 2020

3.1.3.2 Airbus ref: 999.0028/20 Rev 01 Dated 08 April 2020

3.1.4 For those Operators operating under Article 83bis arrangements, the necessary amendments to their Operations Specification, Operations and Loading Manuals will need to be approved independently by the State of the Operator.

4 ENQUIRIES

4.1 Enquiries regarding the content of this Notice should be addressed to the Bermuda Civil Aviation Authority. Enquiries can be sent by email to info@bcaa.bm.

Thomas Dunstan, Director General