

Flight Operations Department, Aviation House, Gatwick Airport South, Gatwick West Sussex, RH6 0YR

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IN THIS ISSUE

1 INFANT FLOTATION DEVICES

1.1 Introduction

- 1.1.1 Civil Air Publication (CAP) 360 Part 1 (Air Operators' Certificates - Operation of Aircraft) specifies in Section 1 of the Appendix to Chapter 6 that on flights where lifejackets are to be carried, an approved flotation cot is to be provided for infants under the age of 18 months. However, it has been learnt recently that such flotation cots as are carried currently in UK-registered aeroplanes cannot be relied upon to accommodate infants over the age of approximately 3 months. This has come about both because infants have on average become progressively larger and because the approved equipment is smaller than previously thought. Most infant lifejackets, that the CAP specifies should be carried for infants/children aged between 18 months and 3 years, are designed for use by infants over the age of 12 months, and therefore cannot be relied upon to accommodate infants younger than this age.
- 1.1.2 It follows that the flotation equipment provided for individual use by infants aged between approximately 3 and 12 months may not serve the purpose for which their carriage - as 'lifejackets' - is prescribed (Scale H to Schedule 4 of the Air Navigation Order 2000 (ANO) or Joint Aviation Requirements - Operations (JAR-OPS) 1/3.825). This vulnerability can be viewed as a 'nine month gap'.
- 1.1.3 In recognising the existence of this 'nine month gap' the Civil Aviation Authority (CAA) has granted a General Exemption which allows the non-carriage of a lifejacket or other approved flotation device for infants between the ages of 3 months and 12 months.

1.2 Requirements

- 1.2.1 ICAO Annex 6 Parts I (Commercial Air Transport - Aeroplanes) and III Section II (Commercial Air Transport - Helicopters, JAR-OPS Part 1 (Aeroplanes) and Part 3 (Helicopters), and the ANO, all prescribe the carriage in specified circumstances of 'one lifejacket or equivalent individual flotation device for each person on board'. Carriage of flotation cots is not prescribed.
- 1.2.2 A flotation cot approved by the CAA in compliance with CAA Specification No. 5 will provide, in addition to flotation properties required to satisfy the ANO Schedule 4 requirement, a means of keeping the infant apart from the water in which the cot may be floating and a means of mitigating the chilling effects of a wind. These advantages - valuable where such a tiny body is concerned - are not prescribed and hence would not appear, strictly speaking, to be essential with regard to international, European or national standards.

1.3 Solutions

- 1.3.1 The situation on equipment approval is that there are two different manufacturers' lifecots currently undergoing the CAA approval process. One will accommodate infants from 0 to 18 months, and the

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other from 0 to 24 months. Both these lifecots are expected to be approved shortly. One infant lifejacket that is currently approved by the CAA accommodates infants from 0 to 60 months.

- 1.3.2 Operators should now give consideration as to how they intend to ensure compliance with the infant flotation device requirement. The CAA is aware that the Federal Aviation Administration's (FAA) Civil Aeromedical Institute (CAMI) is at the moment investigating the potential of cot style flotation devices to improve upon the preservation of life likely to be afforded by infant lifejackets. The National Transportation Safety Board (NTSB) Safety Recommendation A-85-48 recommends amending the TSO to 'provide specific minimum performance standards for flotation devices designed to meet the needs of infants, including whole body protection from hypothermia'. If this were to lead the FAA to prescribe the carriage of flotation cots, it is probable that the JAA and, possibly, ICAO, would in time follow suit. Operators who are thinking of choosing the option of replacing currently carried lifecots with the infant lifejackets are invited to reflect that, following any survivable accident on water, there might be increased loss of life amongst infants who had not been given the level of protection that would have been provided if the new flotation cots had been purchased.

1.4 Exemption

- 1.4.1 The General Exemption allows the non-carriage of a lifejacket or other approved flotation device for infants between the ages of 3 months and 12 months. Operators will be given adequate but not excessive time to make their choice, allocate funds, place their orders, train their crews and effect change. Until the change is effected, operators are expected to continue to carry the current scale of infant flotation devices. Operators who decide to re-equip with infant lifejackets only will be expected to have completed the re-equipment by 30 November 2001 which is the expiry date of this Exemption.
- 1.4.2 Due to the additional cost, and the fact that the new infant lifecots have yet to complete the approval process, the CAA proposes that operators who decide to re-equip with the new lifecots will, upon application, be granted a specific Exemption that will allow the non-carriage of a lifejacket or other approved flotation device for infants between the ages of 3 months and 12 months valid until 31 May 2002.
- 1.4.3 Both Exemptions are subject to the provision that they will be revoked if at any time it would be inconsistent with a standard adopted pursuant to the European Commission Regulation on the Harmonisation of Technical Standards for Civil Aviation for them to remain in force.

1.5 Summary

- 1.5.1 Having learnt recently that the flotation equipment provided for individual use by infants aged between approximately 3 and 12 months may not serve the purpose for which their carriage - as 'lifejackets' - is prescribed, it is incumbent upon the Authority to take action to ensure that this situation is rectified as soon as is practicable.
- 1.5.2 If the recipients of this FODCOM have any comments on its content or wish to receive further explanation, they should address them to:

Mr Dave Gibb
Flight Operations Policy
Safety Regulation Group
Aviation House 1W
Gatwick Airport South
West Sussex
RH6 0YR

Tel 01293 573508
Fax 01293 573991

e-mail dave.gibb@srg.caa.co.uk

Captain D J Chapman

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**Head Flight Operations Department
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