


EASA	CERTIFICATION MEMORANDUM
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Subject

Installation of "Cargo Seat Bags" on Passenger Seats

Log of Issues

Issue	Issue date	Change description
01	14.11.2012	First issue.

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1. INTRODUCTION

1.1. PURPOSE AND SCOPE

The purpose of **this** Certification Memorandum is to provide specific guidance for compliance to CS 25.855 and CS 25.857 in the case of cargo seat bags.

1.2. REFERENCES

It is intended that the following reference materials be used in conjunction with this Certification Memorandum:

Reference	Title	Code	Issue	Date
CS 25.855	Cargo or baggage compartments - Certification Specifications for Large Aeroplanes	CS-25	11	04.07.11
CS 25.857	Cargo compartment classification - Certification Specifications for Large Aeroplanes	CS-25	11	04.07.11
OPS 1.270	Stowage of baggage and cargo - Commission Regulation (EC) No 859/2008 amending Council Regulation (EEC) No 3922/91 as regards common technical requirements and administrative procedures applicable to commercial transportation by aeroplane	EU-OPS		20.09.08

1.3. ABBREVIATIONS

The following abbreviations are used in this Certification Memorandum:

Abbreviation	Meaning
AC	Advisory Circular
CM	Certification Memorandum
CS	Certification Specification
EASA	European Aviation Safety Agency
FAA	Federal Aviation Administration
GM	Guidance Material

1.4. DEFINITIONS

The following definitions are used in this Certification Memorandum:

Definition	Meaning
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2. BACKGROUND

EASA has been made aware of changes to install cargo seat bags on passenger seats in order to conduct flights for transportation of mail and perhaps other items.

Several terms have been used to describe the items which are the subject of this Certification Memorandum, such as "Passenger Seat Cargo Container", "Passenger Seat Container", "Seat Converter Stowage Compartment".

For the purposes of this Certification Memorandum the term "Cargo Seat Bag" is used which is intended to mean;

- a container, probably made of fabric but not limited to this, intended for installation on to or between aircraft passenger seats for the carriage of cargo or baggage.

The subject aircraft changes have been classified as minor, in accordance with Commission Regulation (EU) No 748/2012, Annex I Part 21, 21.A.92.

Typically, the cargo seat bags are installed onto passenger seats in the evening in order that the cargo may be carried overnight in the passenger cabin and are removed again in the morning in order to allow the aircraft to be used once more for passenger carrying operations.

However, more prolonged usage is of course possible and this Certification Memorandum is not intended to cover only overnight operations.

The use of aircraft passenger cabins in such a way as temporary, or more permanent, cargo compartments is not in line with the provisions of CS-25 or any of its predecessor design codes.

The primary concern is in regards to fire protection.

CS-25 defines several different types of cargo compartment (ref. CS 25.857) but the use of cargo bags on passenger seats does not follow the rationale of any.

For instance all compartment types except Class A require a separate approved smoke detector or fire detector system to give warning at the pilot or flight engineer station. Such detection is missing in the case of the cargo seat bag installations of which EASA is aware.

Conversely, Class A compartments are envisioned to be small compartments for the stowage for example of crew luggage in the pilot compartment (ref. FAA AC 25-17) where the significance of the fire threat and proximity of crew for discovering a fire and subsequent fire fighting can easily be assumed to result in an acceptably low safety risk.

However, the use of cargo seat bags on multiple rows of passenger seats may equate to up to several tons of cargo, and the proximity of crew members and their ability to detect, access and fight fires is much more questionable.

On the other hand EASA is not aware of any adverse service experience from such operations.

EASA believes that with appropriate design features and operational procedures ensured it is possible for the carriage of cargo in cargo seat bags to be performed with acceptable safety.

As discussed above, CS-25 does not contain adequate or appropriate safety standards and thus in accordance with Commission Regulation (EC) No 748/2012, Annex I Part 21, 21.A.16B for the approval of such changes EASA shall prescribe special conditions.

In accordance with GM 21.A.91, point 3.3 (i), a change requiring a special condition(s) shall be classified major.

3. EASA CERTIFICATION POLICY

3.1. EASA POLICY

The installation of any cargo seat bags, as described above, for any operational use, shall only be achieved by application for EASA approval of a major change or Supplemental Type Certificate (STC).

This is because special conditions for the installation design and allowable operational use will need to be generated by EASA due to the related airworthiness codes not containing adequate or appropriate safety standards for such a changed product.

3.2. WHO THIS CERTIFICATION MEMORANDUM AFFECTS

Anyone who is designing a change to an aircraft involving cargo seat bags, as described above.

4. REMARKS

1. Suggestions for amendment(s) to this EASA Certification Memorandum should be referred to the Certification Policy and Planning Department, Certification Directorate, EASA. E-mail CM@easa.europa.eu or fax +49 (0)221 89990 4459.
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