APPLICATION PROCESS AND REQUIREMENTS FOR EXEMPTION SA CATS 121.04.02, 2.1.10 (2) (b) (v) TO TRANSPORT CARGO ON PASSENGER AIRCRAFT FOR COVID-19 PANDEMIC

1. Applicability

This General Notice is applicable to all aircraft registered and operated in South Africa who wish to apply for exemption to transport cargo on passenger aircraft for Covid-19 pandemic operations, for a period not longer than two months (60 days) after the end of the lockdown period as set by the president of the Republic of South Africa.

2. Regulatory Reference

Civil Aviation Regulations 2011, Part 11.04.1, Part 21.03.1 and CATS 121.04.2 as amended.

3. Purpose of this General Notice

This General Notice serves as a notification to all applicants for Exemption from SA CAR 2011, Part 11.04.1 to transport cargo on passenger aircraft. This General Notice is not intended to replace any existing regulations but provides requirements and guidelines regarding the application and approval processes for transporting cargo on passenger aircraft. This provision is only limited to Covid-19 operations, for the RSA lockdown period, this is a temporary exemption and only applies if no seat configuration will be done.
4. **ADO Considerations for submission of design data**

   a. The ADO must assess the change on aircraft level and equipment level.

   b. The ADO must assess all physical and functional changes to the aircraft, equipment and operation thereof.

   c. The ADO must demonstrate that the change in function of the seat and seatbelt will still meet the seat and seatbelt TSO limitations. The design data must show that the equipment meets predefined qualification and performance criteria of its TSO.

   d. The ADO must demonstrate that the change from passenger to cargo configuration will result in the aircraft complying to its original Type design.

   e. Since there are no certification requirements in place specifically for this type of change, Special guidelines have been created. The loading of the cargo on the passenger seats affects mainly:

      i. The structural integrity and retention of items of mass under flight and emergency landing conditions,

      ii. The fire protection due to the amount of cargo in the passenger cabin,

      iii. Emergency evacuation provisions

   f. **Structural integrity**

      i. The ADO must perform a risk assessment in order to identify hazards related to operating cargo flights using cabin configurations which have been approved for transporting passengers only.

      ii. The packaging must be fully enclosed, and must comply to the IATA Dangerous Goods Regulations,

      iii. The packaging must retain its contents under loads in flight (flight and landing loads of the specific aircraft model) and the emergency landing conditions specified in the original TC design standard.
g. **Fire-protection:** The required equipment may be part of the aircraft basic emergency equipment.

If no smoke detection or fire suppression system is installed, dedicated and trained personnel shall accompany the cargo on flights where cargo is loaded. In addition, compliance with the following conditions shall be shown:

i. Regardless of the number of passenger seats installed in the aircraft cabin, there must be adequate fire extinguishers installed in the cabin containing an extinguishing agent sufficient to fight a fire in at least one cargo package taking into account all loading configurations.

ii. There must be at least the following firefighting equipment installed in the cabin and readily accessible for crew:

   i. A smoke hood (TSO/ETSO C116 or equivalent).

   ii. Fire retardant gloves.

   iii. Crowbar.

   iv. One torch

iii. There must be provisions for detecting a fire or smoke in the passenger compartment in which the cargo is loaded. In the absence of a detection system installed in the compartment, approved alternative means must be provided.

iv. The cargo packaging restrains and or cargo nets shall comply with fire protection and flammability to ensure that they do not accelerate any fire.

h. **Emergency Evacuation**

i. Packaging must be fully closed and secured to prevent anyone becoming trapped in case of an emergency.

ii. Emergency exit access: the cargo shall not be loaded in seat rows fore and aft or leading to emergency exits (especially Type III or IV emergency exits).
iii. Width of aisle; the width of the aisles must not be decreased by this change.

iv. Emergency lighting; the cargo must not obscure any portion of the emergency lighting system e.g. nonelectrical floor path marking installations, low level exit identifier.

v. On aircraft cabins with only one pair of emergency exits, cargo must not be loaded on seat locations where crew have to pass those seat locations in order to access any emergency exit.

vi. Extra crew has to seat on seats which are not located near the cargo.

i. **Loading Limitations:** Mass and balance; the number of acceptable cargo and packaging will be assessed per the individual cabin configuration.

The maximum load of each seat should always not be exceeded during this exemption.

j. **Guidelines:** Guidelines from aircraft OEM, seat OEM, IATA must also be considered.

The ADO must ensure that the change complies to the original type design standard. The ADO is responsible for identification of the applicable standard and their subparts.

5. **Example of the applicable subpart**

PART 25—AIRWORTHINESS STANDARDS: TRANSPORT CATEGORY AIRPLANES

Subpart A – General
Subpart B – Flight
Subpart C – Structure
Subpart D – Design and construction
Subpart F – Equipment
Subpart G – Operating limitations
Appendix H – Instruction for continued airworthiness
Appendix J – Emergency evacuation
6. Minimum Documents Required

The applications will be assessed in line with the requirements listed in the GENERAL NOTICE # AIR-2016/001-AED, with particular reference to Section 3.1:

a. Certification Plan  
b. Compliance Checklist  
c. Structural Analysis/Substantiation  
d. Installation Instructions  
e. A Flight Manual Supplement  
f. Supplemental Instructions for Continued Airworthiness  
g. Hazard Assessment  
h. A System Safety Analysis  
i. Mass and Balance

This list is not exhaustive and further information may be required.

7. Effective Date

Implementation date for this notification is effective from 20 April 2020.

8. Queries

For any queries or feedback regarding this general notice please contact:

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