

## Accessibility of Cargo Compartments

### BACKGROUND

Current ICAO Airworthiness requirements (Annex 8, Part III B, para. 4.2 g), and Dangerous Goods Technical Instructions (2.4.1.1) consider in-flight cargo accessibility as a factor in aircraft cargo compartment fire suppression requirements and items allowed to be carried in large all-cargo aircraft.

In neither case is there an assumption that safety standards will be lower for all-cargo aircraft, but the provisions are based on the assumption that all-cargo operators have specific fire suppression procedures not normally available on passenger flights, such as operating the aircraft at very high cabin altitudes to starve fires of oxygen.

Modern aircraft crews consist of two operating pilots. In an emergency, one pilot normally assumes aircraft control while the other performs appropriate emergency procedures. This requires both pilots to remain at their stations. Therefore, taking into account cargo accessibility (by the pilots) as a factor in fire suppression capability or Standards is inconsistent with the way large modern aircraft are operated.

It is important, however, not to limit pilot actions in the case of an emergency, and cargo compartments should therefore still be accessible by the pilots in-flight as one possible last chance to successfully suppress a cargo fire.

### POSITION

In-flight accessibility of cargo compartments by the pilots is inconsistent with current operational procedures and should not be used as a criterion for fire suppression design or capability in airworthiness or operational requirements, or what is allowed in those compartments by the dangerous goods transport regulations.

When conditions permit, and if standard procedures cannot ensure safe operation of an aircraft, pilots should nevertheless continue to have the option of entering a cargo compartment as an emergency action.