

Frank Brehany

- Retired Police Officer
- Qualified & Practising Lawyer
- Former MD National Consumers Organisation
- Now Independent Consumer Campaigner & Media Commentator
- Self-funded, Expenses from Media, not a member of any Political, Lobbying, Industrial or Consumer Grouping
- Involved in Cabin Air Quality since 2006

Motives, Intentions & Language



"Don't trust a word these people are telling you. They're here to steal your land"



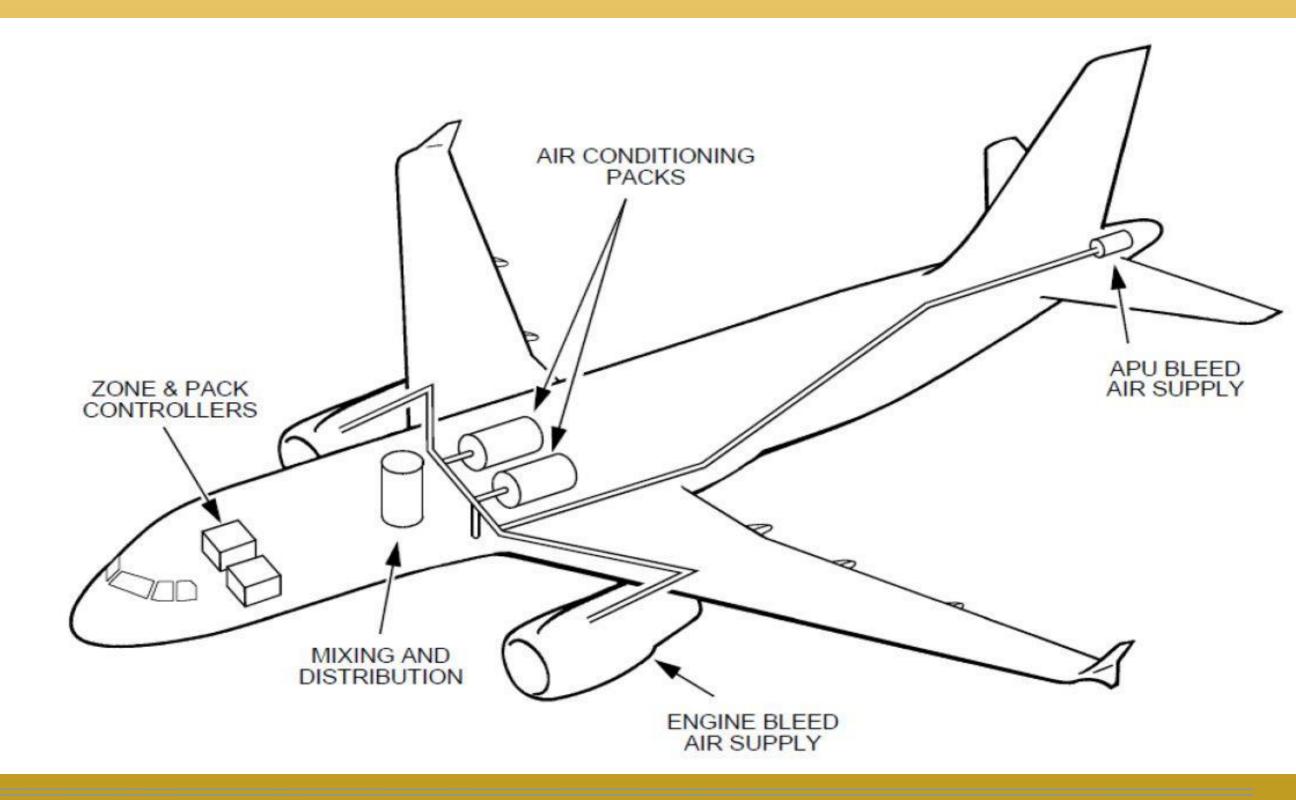




AuxilliaryPower Unit (APU)

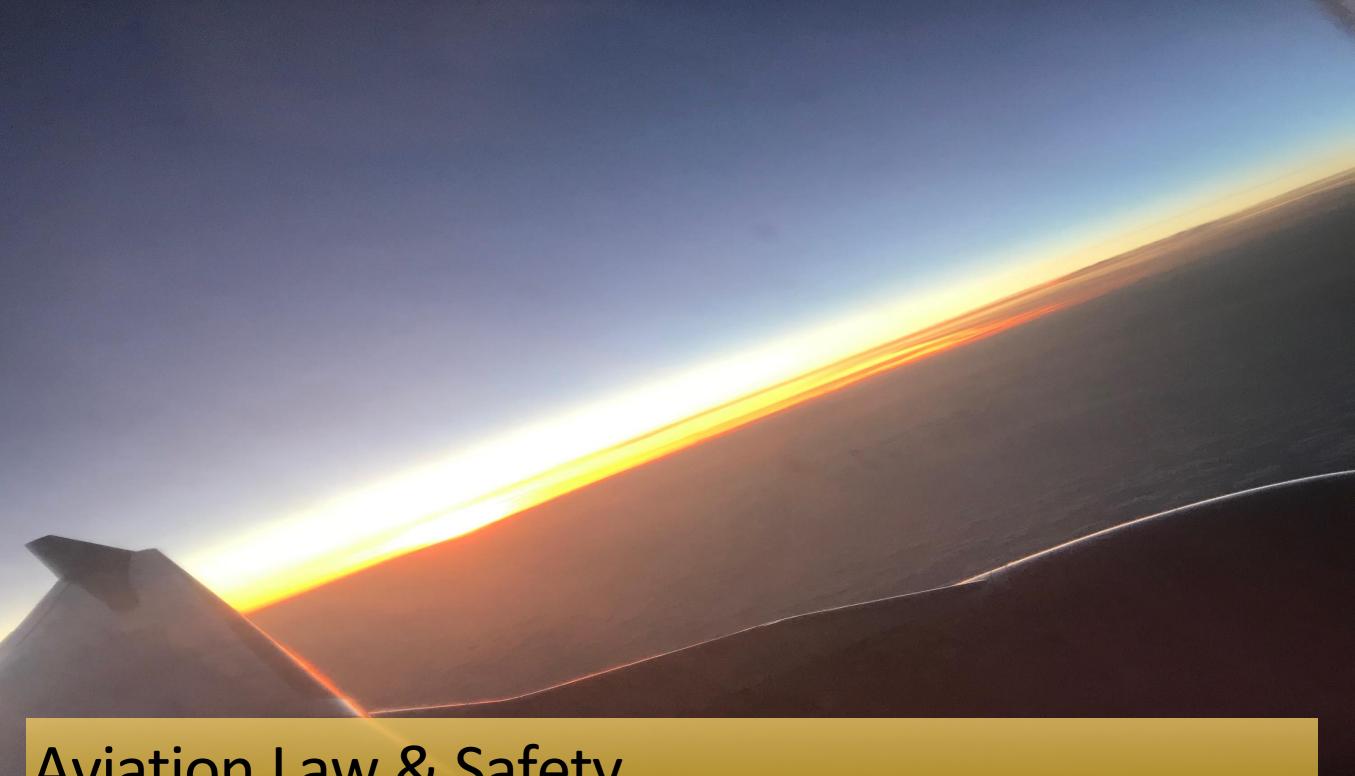
A ground-based aircraft motor

Bleed - Air



Ducting & Particulates





Aviation Law & Safety

A brief overview

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The Basic Regulation:
 Regulation (EU) 2018/1139 - Common Rules for Civil Aviation. Binding in all its
    elements, (adopted by the EU Parliament & Commission)
    (https://www.easa.europa.eu/regulations#regulations-basic-regulation)
Implementing Rules to Basic Regulation (adopted by EU Commission)
   (https://www.easa.europa.eu/regulations#regulations-basic-regulation)
Supported by Aviation Standards (<a href="https://www.easa.europa.eu/document-">https://www.easa.europa.eu/document-</a>
  library/acceptable-means-compliance-amcs-and-alternative-means-compliance-
  <u>altmocs</u>):
 Certification Specifications (CS);
 Acceptable Means of Compliance (AMC) (Non-binding - not legislation);
 Alternative Means of Compliance (AltMoC) (Non-binding - not legislation);
 Guidance Material;
 All adopted by EASA
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Need to understand TFEU;

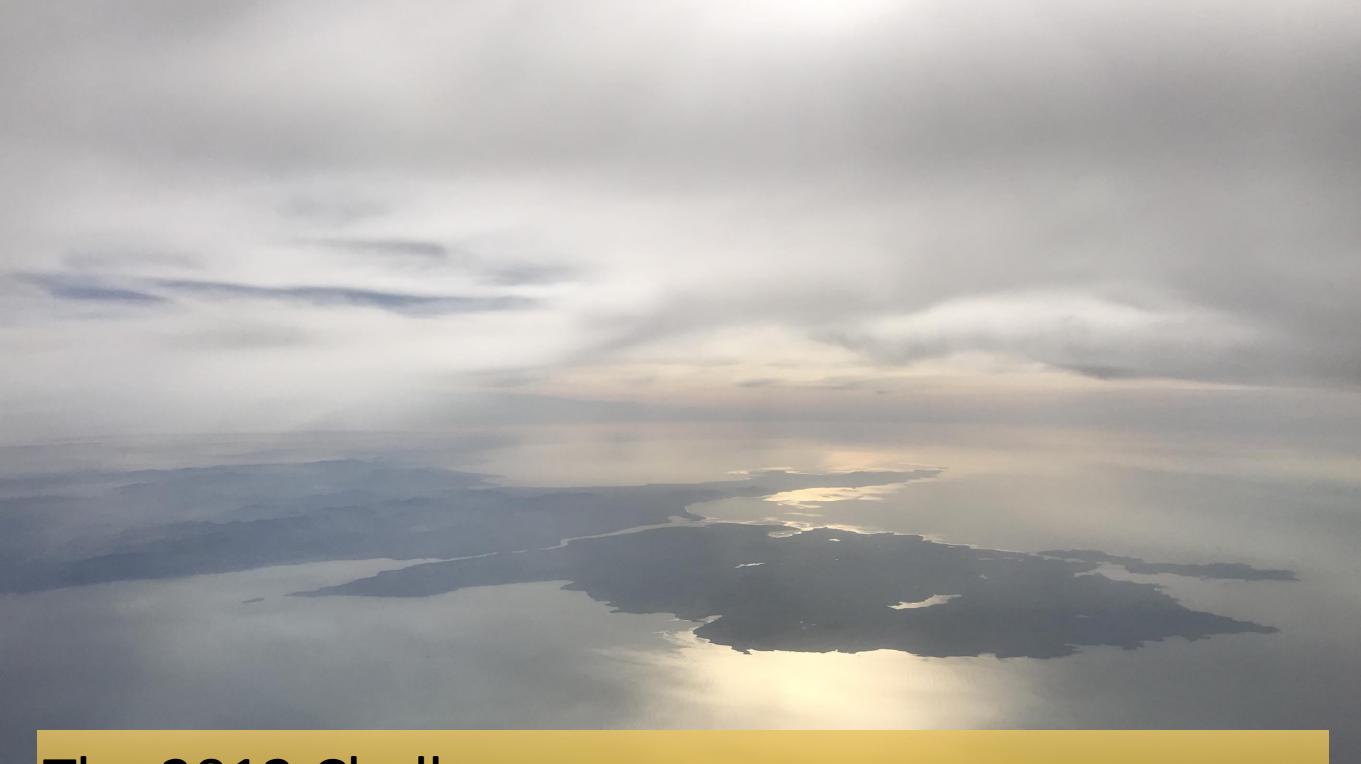
EU Reg 1025/2012 (https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32012R1025&from=EN)

The starting point for all Standards work;

Important for Single Market and External EU Relations

Preamble 19: "Standards can contribute to helping Union policy address the major societal challenges such as climate change, sustainable resource use, innovation, ageing population, integration of people with disabilities, consumer protection, workers' safety and working conditions"

Article 10 allows EU Commission to Mandate a Standard Satisfies EU 1985 'New Approach' to Legislation & Standardisation



The 2012 Challenge

Motives, Intentions & Language

Unions, Representative Groups, Consumers

Challenged the monopoly of Industry to make a Standard

First time a Standard was challenged

Lobbying of Commission & DG's

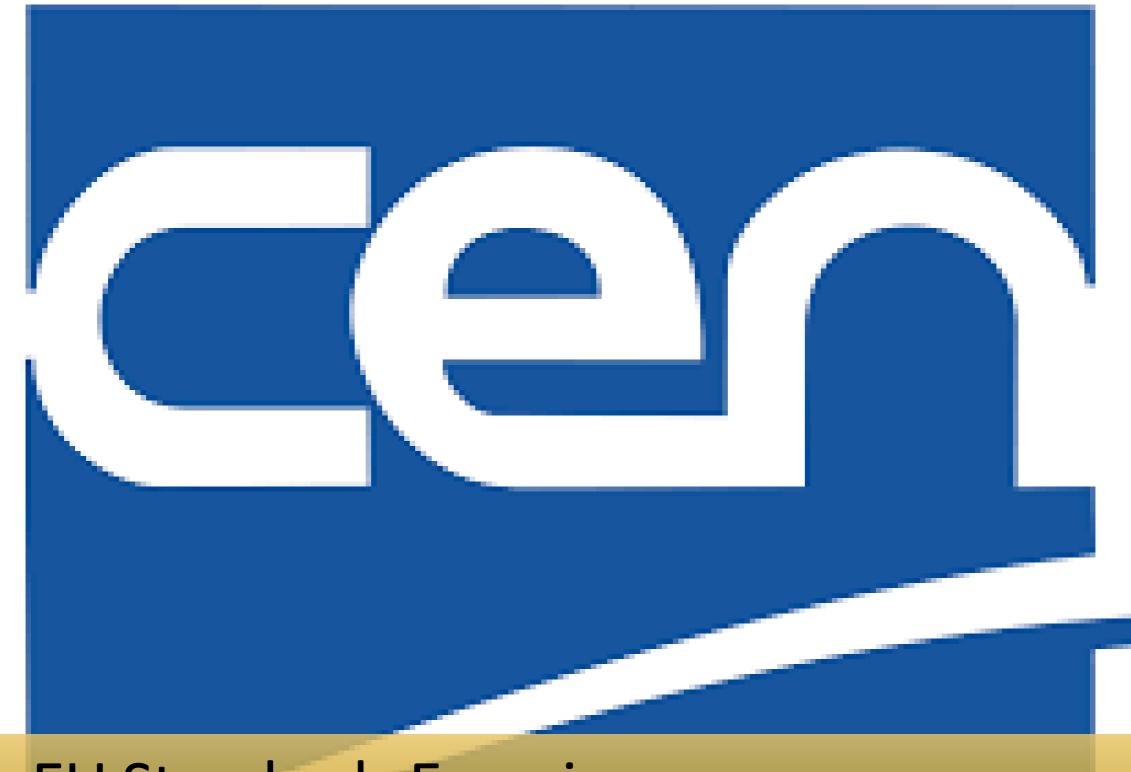
Formal challenge at CEN

Argument: Standard not fit for purpose - ignored science -

one-sided - did not protect workers or PX's

Overturned

New Standard ordered!



The EU Standards Experience

A brief overview

Process started in 2012

Still at it, but, we have a draft Standard!

The battle between 'Technical' & 'Ambition'

Some are interested in 'nuts and bolts'

Others wanted greater processes and

protections

Data: who will share the data?

Identifying Compounds: March 2018!

Draft Standard: Identifies 16 Chemical Marker Compounds, reliably found; Identifies sources of contamination; Invokes the Precautionary Principle (https://eur-lex.europa.eu/legal- content/EN/TXT/PDF/?uri=CELEX:52000DC0001&from=EN): Hazard Characterisation/Identification; Qualitative/Quantitative assessment of Exposure Risk Characterisation, but No measurements - not agreed! It speaks to sensor technology Blood tests for crew Information to Passengers UFP's! The Standard is broad and ambitious!

CEN TC436











TG1
Identify and report on appropriate Chemical Marker
Compounds

TG2
Identify
sampling
technologies
& means of
analysis

TG3
Identify
suitable
sensor
methods
following
TG1 &
TG2's work

TG4
Identify
suitable
training and
other
prevention
methods

DC
Drafting
Ctte
3 meetings
Numerous
break-out
sessions
Mirror Cttes

Chapter Headings:

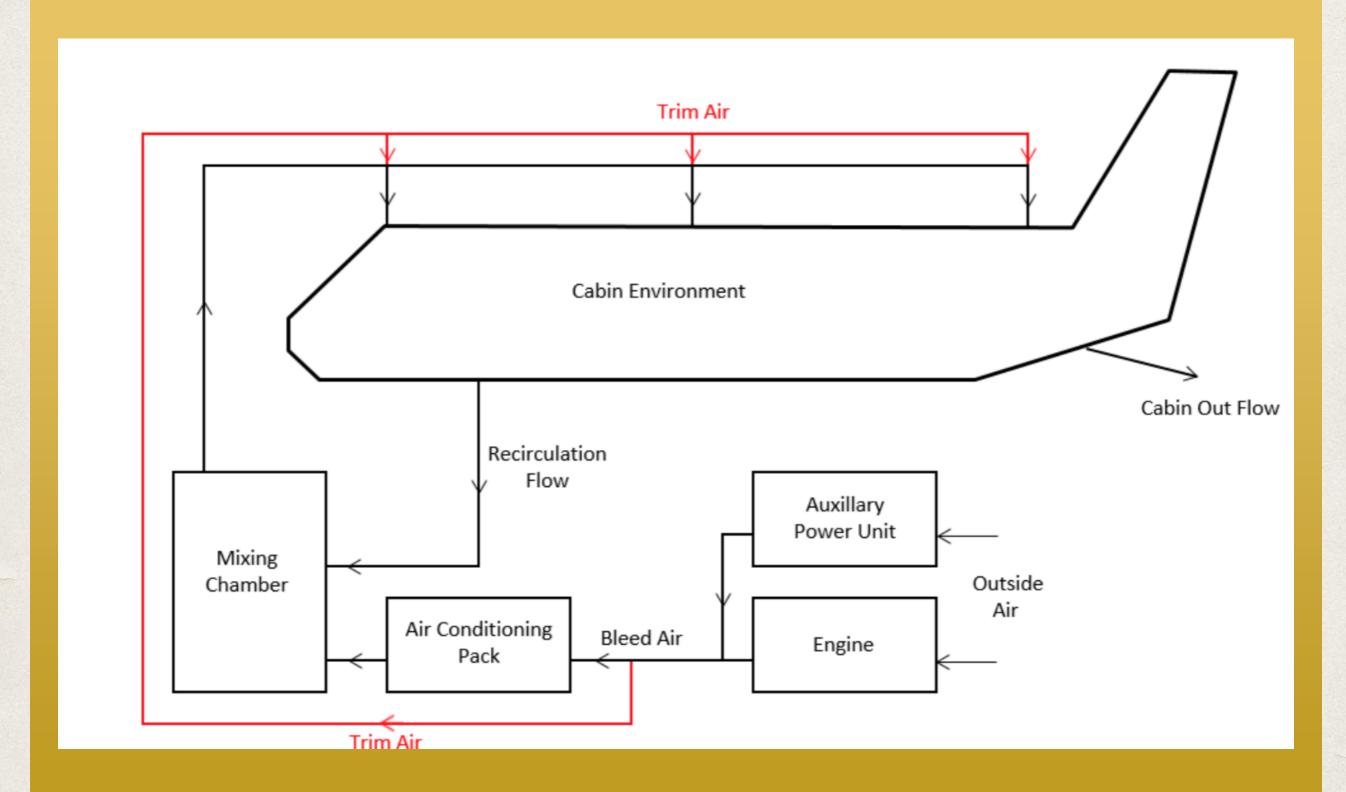
Annex Content:

- Chemical Compounds: (Sources/Bleed etc);
- Requirements for Air Quality: (PP, Monitoring, online/offline etc;)
- Requirements for Analysis & Reporting: (Data, reporting & recording, system etc);
- Correction & Preventive Actions: (To identify and remedy contaminant sources etc);
- Airline Worker Training & Education: (All Aviation user/workers etc)

- Environmental Control System (ECS): Bleed/Bleed-Free;
- Chemical Marker Compound Tables;
- ♣ PP;
- Methodology for online/offline measurements;
- Flight crew & maintenance best practice;
- Chemical Compounds Table (Introduced in Cabin);
- Sources of oil leakage;
- Overview of data

Flight phases	Aircraft System configuration and control settings						
	ECS	HUMIDIFIER	APU BLEED	ENGINE BLEED	GROUND AIR SUPPLY		
	Or E-ECS 2)				UNIT		
Engine Start ¹⁾	OFF	OFF	OFF	OFF to ON			
APU start ¹⁾	OFF	OFF	OFF to ON	OFF			
Ramp	FULL HOT FULL COLD 20°C to 25°C or actual 3)	ON OFF ³⁾	ON OFF ³)	OFF	ON OFF ³)		
Ramp - De-Icing 1)	OFF	OFF	OFF	OFF to ON			
Taxi out	20°C to 25°C or actual	ON OFF ³⁾	ON OFF ³⁾	ON OFF ³)			
Take Off	20°C to 25°C or actual	ON OFF	OFF	ON			
Climb	20°C to 25°C or actual	ON OFF	OFF	ON			
Cruise	20°C to 25°C or actual	ON or OFF	OFF	ON			

Chemical	CAS num	Family compo	Releva	nt Source					
marker compounds Chemical compounds	ber	und	Engin e Oil	Hydraul ic fluid	Engine exhau st gas (13)	Fuel (Unburne d)	Deicin g fluid	Occupan ts	Engin e Oil
Ozone	1002 8- 15-6	Inorga nic			x (1)				
Nitrous oxides (NOx)	-	Inorga nic			Х				
Carbon dioxide (CO ₂)	124- 38-9	Inorga nic	(10)	(10)	х			x (2)	
Carbon monoxide (CO)	630- 08-0	Inorga nic	x (3)	Х	Х		x (3)		
Acrolein	107- 02-8	Aldehy de	x (13)	x (13)	x (13)				
Formaldehyd e (11)	50- 00-0	Aldehy de	х	х	Х				Х
Acetaldehyde	75-	Aldehy	Х	Х	х			Х	



Screenshot taken from Standard: Not to be shared/reprinted/reproduced without CEN written permission

Source no. in Table B.1	Source (1)	Marker Compound (2)	Reliability Rating of Marker Compound (3)	CAS number
1	ENGINE OIL	Tricresyl phosphates (4)	A	1330-78-5
		Acetaldehyde	В	75-07-0
		C ₅ -C ₁₀ carboxylic acids	В	n/a

3. Reliability rating definitions:

A: Marker compound is an ingredient in the product being measured.

B: Marker compound is either a pyrolysis product of the product being measured or off-gasses from a bulk sample of the product.

C: Marker compound meets "B" criteria, but with some limitations, such as pyrolysis product is generated over more a limited range of temperatures, is present either at very low levels or at belowambient levels, or limited data are available.



Read TFEU

Become involved via National Standards Bodies (Norway:

https://www.standard.no/en/toppvalg/about-us/standardsnorway/#.XPULbi MyuU);

Read & understand EU Reg 1025/2012;

CEN Guidelines

(https://boss.cen.eu/reference%20material/RefDocs/Pages/

CENGuides.aspx)

CEN Code of Conduct:

(https://boss.cen.eu/ref/Code conduct experts.pdf)

Go beyond Technical - be Ambitious - be Constructive

Get to understand: Motives, Intentions & Language!

