

Response ID ANON-X6EQ-HJ71-X

Submitted to Carbon Monoxide in Piston Engine Aircraft
Submitted on 2024-02-22 11:07:27

Personal information

1 Name

Name:
Pete Stratton

2 Do your views officially represent those of an organisation?

Yes, I am authorised to submit feedback on behalf of an organisation

3 If Yes, please specify the name of your organisation.

Organisation:
British Gliding Association

4 Can we publish your response?

Yes

Introduction

5 To what extent do you agree that existing measures and guidance are sufficient to address the threat posed by carbon monoxide (CO) in piston engine aircraft?

Partially agree, existing measures and guidance could be improved

6 Considering the risks posed by CO in piston engine aircraft and the availability of affordable active CO detectors, are there any circumstances where an active CO detector ought to be mandatory?

Other (please specify)

Other (please specify):

Yes, for piston engine aircraft (excluding open-cockpit) operating recreationally or commercially with passengers other than self-launching and self-sustainer sailplanes where the piston engine is mounted on a pylon.

These self-launching and self-sustainer sailplanes use their small piston engines, which with their exhausts are on pylons mounted on the fuselage behind the wings, either take-off or fly level for a short period before closing down the engine and retracting the pylon and engine. There is no connection to the cockpit (no heater) other than an electrical loom and/or a mechanical linkage and a fuel on/off selector.

Requiring these aircraft operators to use a CO detector would be nonsensical.

Theme 1 – Active CO detectors

7 In your opinion what are the biggest barriers facing pilots/owners when it comes to getting an active CO detector for their piston engine aircraft? Select all that apply.

Selecting an active carbon monoxide detector, Deciding where to position and/or how to securely mount an active carbon monoxide detector in an aircraft

8 Recognising the wide range of active carbon monoxide detectors available, how confident are you of finding a device that suits your needs and budget?

Somewhat confident

Theme 2 – Piston engine aircraft maintenance

9 To what extent do you agree that CO concentration checks ought to be a mandatory maintenance requirement for piston engine aircraft?

Disagree

10 Recognising that an effective CO protection strategy involves both preventative maintenance and detection, to what extent would a requirement to have an active CO detector discourage you from also performing preventative maintenance (e.g. CO concentration checks)?

Somewhat discouraged – I might rely more on the active CO detector, but would consider preventative maintenance (e.g. CO concentration checks) as an additional protection measure.

Theme 3 – Passenger protection

11 Recognising that passengers in piston engine aircraft may not be aware of the risks associated with CO, to what extent do you agree that passenger protection from CO ought to be prioritised?

Agree

12 To what extent do you agree that an active carbon monoxide detector, capable of alerting pilots via aural and/or visual warnings, should be required for piston engine aircraft operations involving passengers who may not be aware of the risk posed by carbon monoxide?

Agree

Theme 4 – Example active CO detector mandate

13 If the CAA introduced the requirement below, to what extent do you agree that it is proportionate given the risks posed by carbon monoxide in piston engine aircraft and the CAA's priority to protect passengers?

Disagree

14 If you have any comments in relation to this consultation, please detail them below.

Please enter any comments below:

Question 10 identifies preventative maintenance as a concentration check. This approach to questioning is likely to erroneously skew your consultation data in favour of concentration checks. Most powered aircraft owners and engineers will be aware that other preventative maintenance takes place (eg leak checks) and will be supportive of that if not supportive of concentration checks (and associated maintenance equipment costs as well as actual added value).

Question 12 - we agree. Our point regarding self-launching and sustainer sailplanes with pylon mounted engines must be considered.

Question 13 - we disagree only because the statement in the question does not recognise the significant difference with self-launching and sustainer sailplanes with pylon mounted engines.

A Touring Motor Glider (the CAA-traditional image of a Self Launching Motor Glider) which has a fuselage mounted piston engine and, usually, a cabin heater, should be in scope.

Please note that there are increasing numbers of e-powered aircraft including self launching and sustainer sailplanes.

Avoiding unnecessary or disproportionate or inappropriate new laws and equipment is important.