



May 15, 2023

The Honorable Maria Cantwell
Chair
U.S. Senate Commerce, Science and
Transportation Committee
254 Russell Senate Building
Washington DC, 20510

The Honorable Ted Cruz
Ranking Member
U.S. Senate Commerce, Science and
Transportation Committee
512 Dirksen Senate Office Building
Washington DC, 20510

The Honorable Sam Graves
Chair
U.S. House of Representatives
Transportation and Infrastructure
Committee
2165 Rayburn House Office Building
Washington, DC 20515

The Honorable Rick Larsen
Ranking Member
U.S. House of Representatives
Transportation and Infrastructure
Committee
2165 Rayburn House Office Building
Washington, DC 20515

Dear Chair Cantwell, Chair Graves, Ranking Member Cruz, and Ranking Member Larsen:

The undersigned organizations urge you to include a provision in the 2023 FAA Reauthorization bill that would require the Federal Aviation Administration (FAA) to review the contents of Emergency Medical Kits (EMK) on a regular basis. The current requirements for epinephrine in the EMKs to treat anaphylaxis are not medically sound and should not be permitted to remain.

Anaphylaxis, a severe reaction that can be fatal without treatment, is commonly triggered by medicines, insect stings, and food. Anaphylaxis affects a significant proportion of the U.S. population, with estimates suggesting a prevalence of at least

one in 50 individuals (potentially as high as one in 20).¹ In addition, there are an estimated 20 to 33 million people in the U.S. with potentially life-threatening food allergies.^{2,3,4} Epinephrine, when promptly administered, is the sole available treatment for anaphylaxis, emphasizing its critical role in managing this condition caused by exposure to allergens.

EMKs are only required to have epinephrine in a vial that must be withdrawn and administered by a medical professional with needled syringe. This is especially troubling as there is no guarantee that a medical professional will be on board a flight in case of an emergency.

Notably, the Aerospace Medical Association (AsMA) stated in its revised recommendations to FAA for medical kits for passenger aircraft that “auto-injectors are easier to use and can be used by cabin crew under order from ground medical advisor if there are no health professionals on board. The AAP endorsed this suggestion as well as suggested its availability in pediatric dosage.”⁵

Further, there have been cases where epinephrine vials have not been on flights.⁶ FAA recently extended a long-term exemption from stocking required lifesaving medications in their EMKs through 2024, including epinephrine. These exemptions are meant to be used in times of drug shortage, but there have been reports of missing

¹ Wood, R. A., Camargo, C. A., Jr, Lieberman, P., Sampson, H. A., Schwartz, L. B., Zitt, M., Collins, C., Tringale, M., Wilkinson, M., Boyle, J., & Simons, F. E. (2014). Anaphylaxis in America: the prevalence and characteristics of anaphylaxis in the United States. *The Journal of allergy and clinical immunology*, 133(2), 461–467. <https://doi.org/10.1016/j.jaci.2013.08.016>

² National Center for Health Statistics. (2023). More Than a Quarter of U.S. Adults and Children Have at Least One Allergy. Centers for Disease Control and Prevention. https://www.cdc.gov/nchs/pressroom/nchs_press_releases/2022/20220126.htm

³ Gupta et al., Prevalence and Severity of Food Allergies Among US Adults. *JAMA Network Open*. 2019 Jan 4;2(1)

⁴ Gupta R, Warren C, Blumenstock J, Kotowska J, Mittal K, Smith B. The prevalence of childhood food allergy in the United States: An update. *Ann Allergy Asthma Immunol* (2017).

⁵ Guidance Document Produced by: Aerospace Medical Association Air Transport Medicine Committee (2019). <https://www.asma.org/asma/media/AsMA/Travel-Publications/FAA-med-kit-Guidance-Document-June-2019.pdf>

⁶ Mandelbaum, L. (2022, August 2). *Anaphylaxis Over Ocean: MD Finds No Epinephrine Vial in Plane’s Kit*. Allergic Living. <https://www.allergicliving.com/2022/08/02/anaphylaxis-over-ocean-md-finds-no-epinephrine-vial-in-plane-kit/>

EMK contents when this is not the case. Additional safeguards and monitoring are needed to ensure that these exemptions are not misused and that EMKs are restocked for passenger safety.

EMKs must be regularly reviewed to ensure that passengers are protected during airline travel. For passengers at risk of anaphylaxis, this review should ensure that epinephrine is included in a form that is easily and effectively administered by a lay person and available in appropriate weight-based dosing to ensure the safety of infants, toddlers, children, and adults.

We thank you for your work to improve passenger safety as you work to reauthorize the FAA.

Sincerely,

Allergy & Asthma Network (AAN)

Asthma and Allergy Foundation of America (AAFA)

Food Allergy & Anaphylaxis Connection Team (FAACT)

Food Allergy Research and Education (FARE)

No Nut Traveler