

The new EU Fatigue Management Regulation Key Issues

Implementation Workshop Air Ops Regulation (EU) No 965/2012

Warsaw, 15-16 May 2014

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Implementation

Flight time specification schemes

FDP at night

FRM

Approval of individual flight time specifications schemes



The new EU fatigue management framework

When? Reg. 83/2014 Art. 2 – 18 February 2016

To whom? CAT operations by aeroplane except Air Taxi, Single Pilot & EMS

Opt out In-flight rest until 17 February 2017



Cover Regulation

Recitals

FTL without prejudice to more protective social legislation

Continuous review of effectiveness

Impact of new rules on aircrew alertness

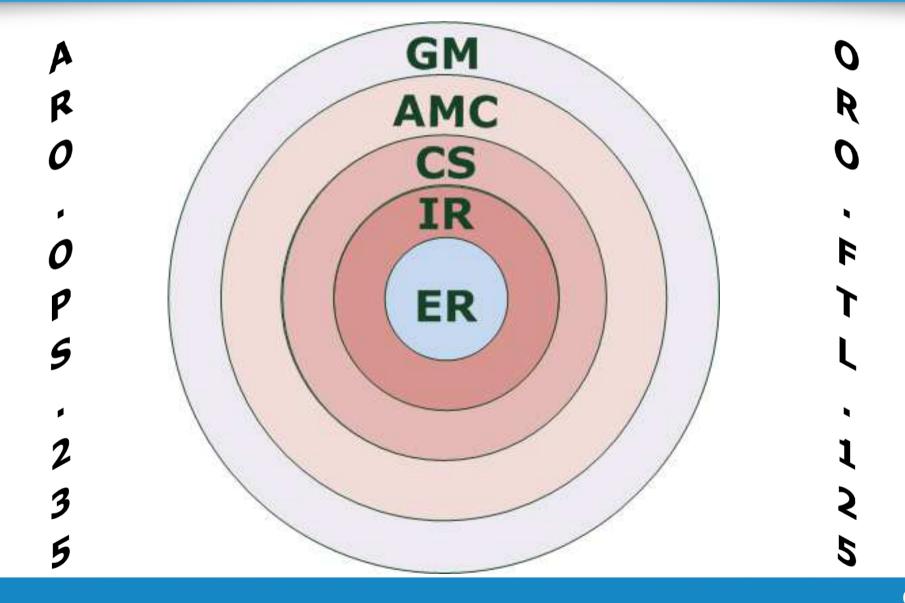


ARO.OPS.230 Determination of disruptive schedules

ARO.OPS.235
Approval of individual flight time specification schemes

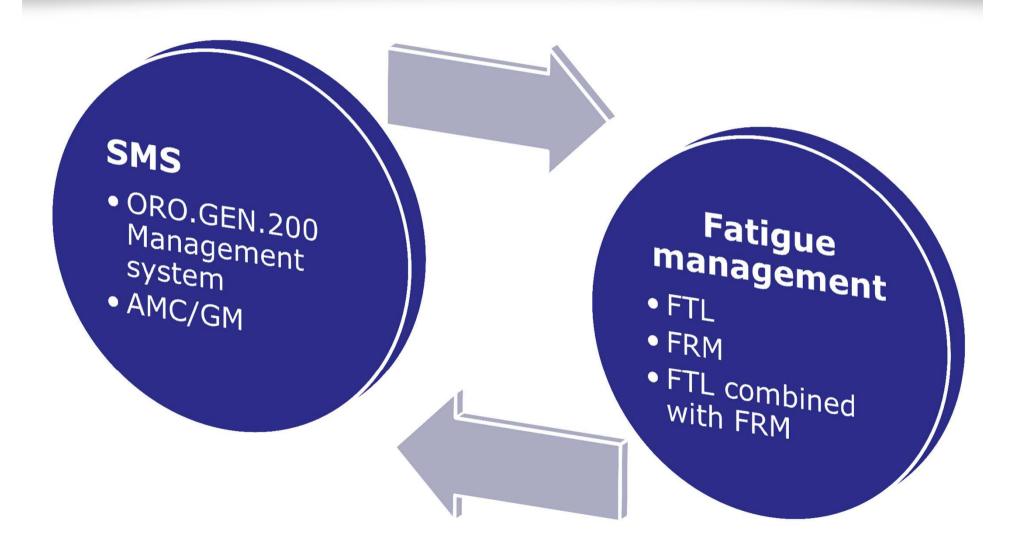


Flight time specification schemes

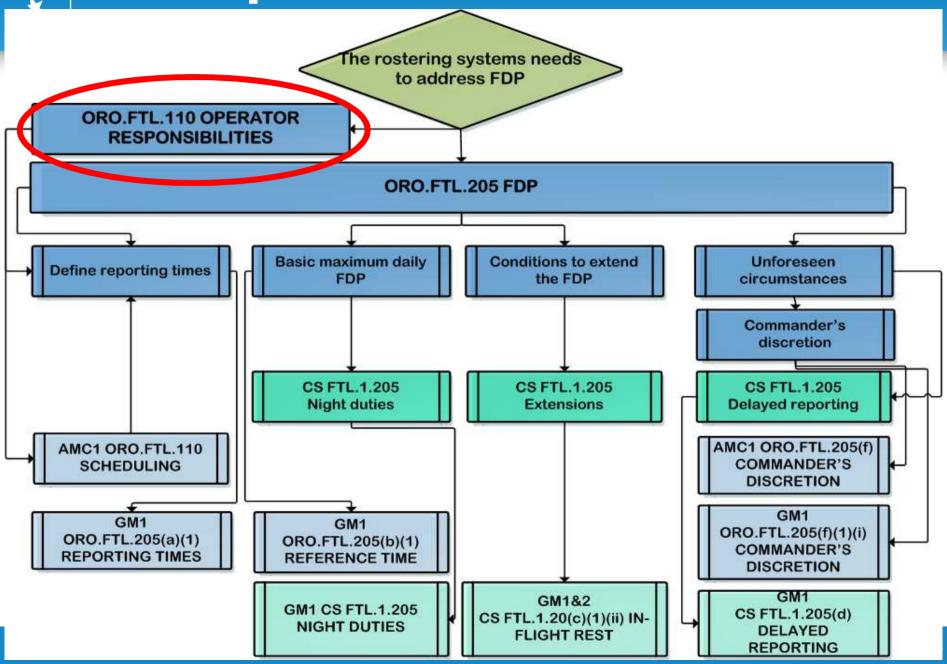




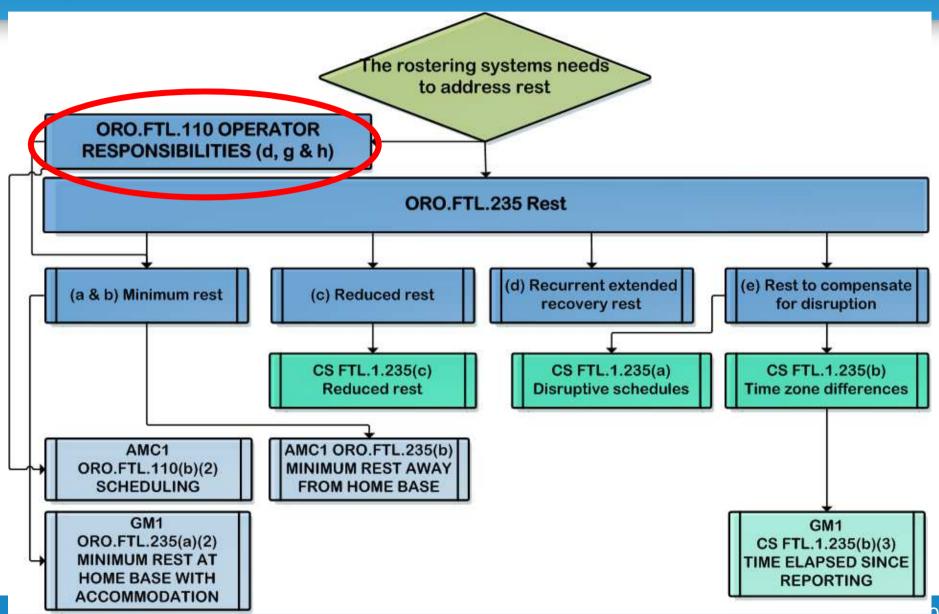
Fatigue management & SMS



Example: FDP

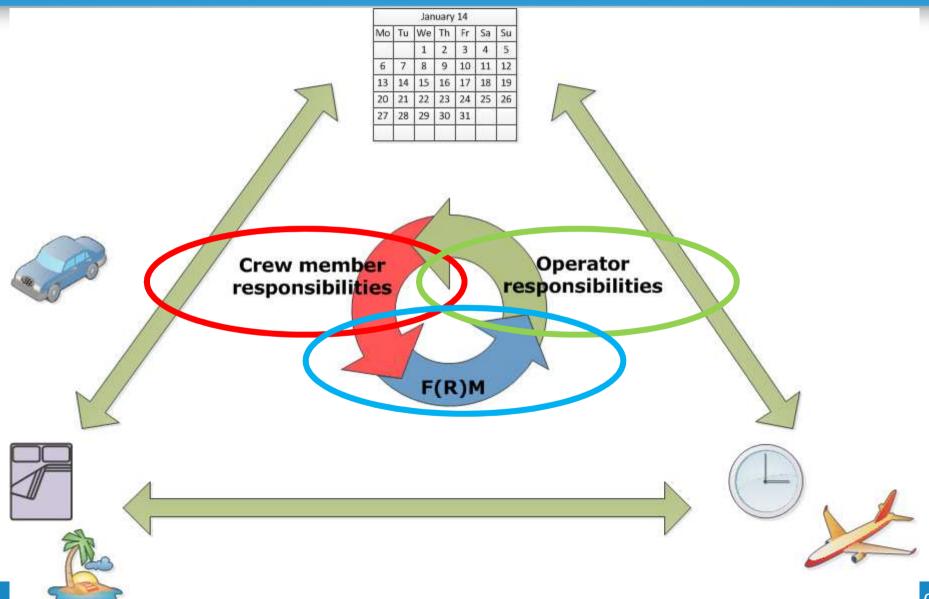








Flight time specification scheme





Night duty

- Acclimatised
- Appropriate fatigue management

Unknown state of acclimatisation

- Max FDP = 11h
- Effect on fatigue of rotations monitored



Stby other than Airport

- 23:00 07:00 does not count towards FDP reduction if:
- Stby starts between 23:00 07:00



What is fatigue risk management?



Fatigue Risk Management

A data-driven, business risk management approach to fatigue

Processes for measuring, mitigating and managing fatigue risk

More effective than FTL alone

Based on scientific principles and knowledge, data collection and analysis, and so enables to maintain an equivalent level of safety whilst allowing greater operational flexibility.



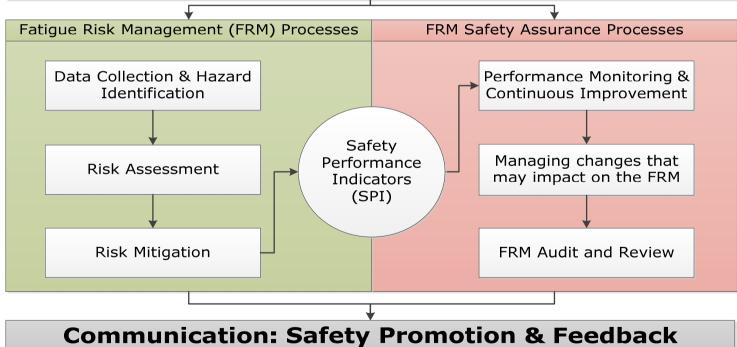
FRM is an integral part of SMS

SMS	FRM
Safety policy & objectives	FRM policy & documentation
Safety risk management	 Fatigue risk management process Identification of hazards Risk assessment Risk mitigation Implementation
Safety assurance	 Fatigue safety assurance Monitor effectiveness of FRM Management of change Continuous improvement of FRM
Safety promotion	FRM promotion processTraining programmesFRM communication plan



FRM Policy

Effective Reporting System / Just Culture



Fatigue Management Training

Example sources of data on fatigue

Roster metrics e.g. stability, standby usage, number of sectors

Statistics: absenteeism, sickness, turn-over, commute

Fatigue reports and incident investigations

Ergonomic assessment of work and sleep environment

Fatigue model analysis of rosters

Crew surveys and focus groups

Scientific studies e.g. sleep diaries, actigraphy



Approval & Oversight (1)

Aesthetics versus Substance

Balanced communication

Clear reporting process

Appropriate reporting forms

Manual relevant to the operator

Assurance finding

Access to all

Eye candy

Flashy power points

Overly detailed reporting forms

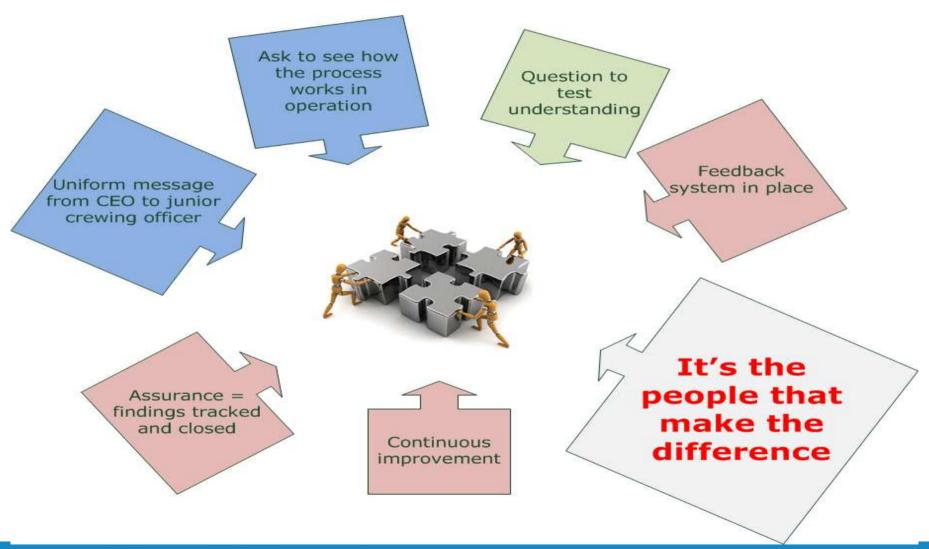
"Familiar" Manual

"Perfect" paperwork
Waffle



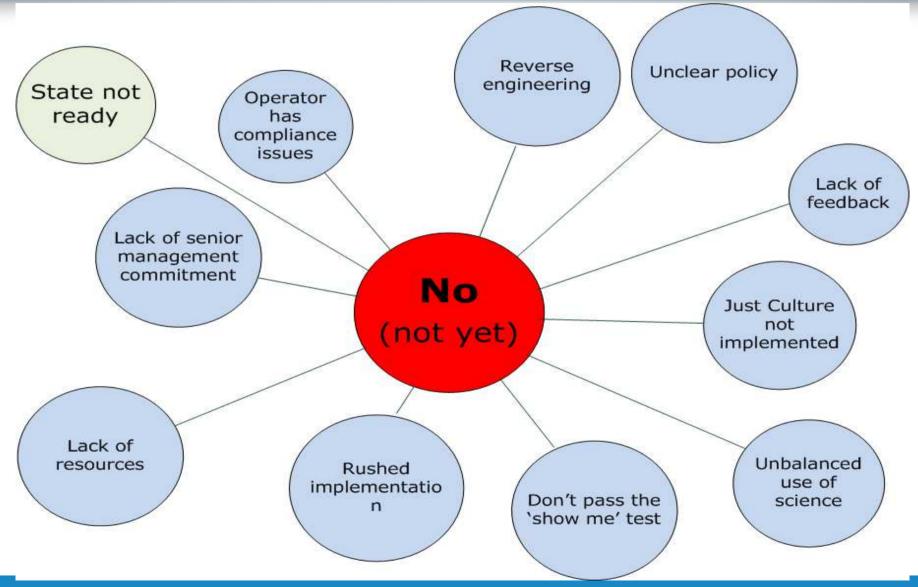
Approval & Oversight (2)

How to tell the difference?





Approval & Oversight (3)





State needs to be ready

Operator demonstrates compliance with FTL through fatigue management

• Relevant PIs, reporting system etc.

Demonstrable commitment to FRM



Benefits of FRM

Rather than complying with prescriptive limits, FRM relies on actually measuring and managing the fatigue-related risks.

Increased risk knowledge enables enhanced management of safety.

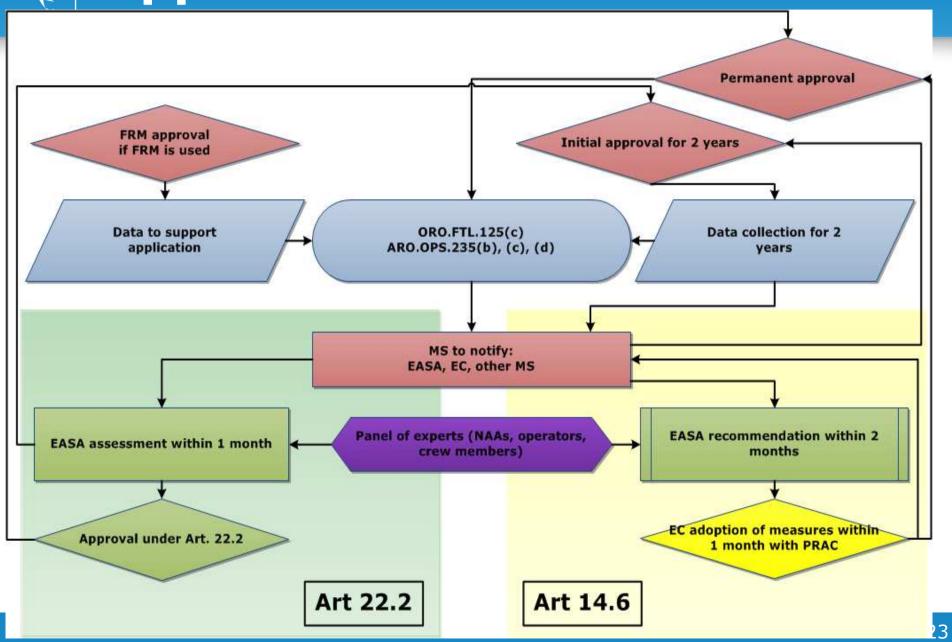
Benefits include reduced safety events, informed strategic decisions, increased operational flexibility, reduced insurance premiums, more effective regulatory oversight and improved relations with the unions.

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Approval of IFTSS





Time frame for assessment

Panel of experts (NAAs, operators, crew members)





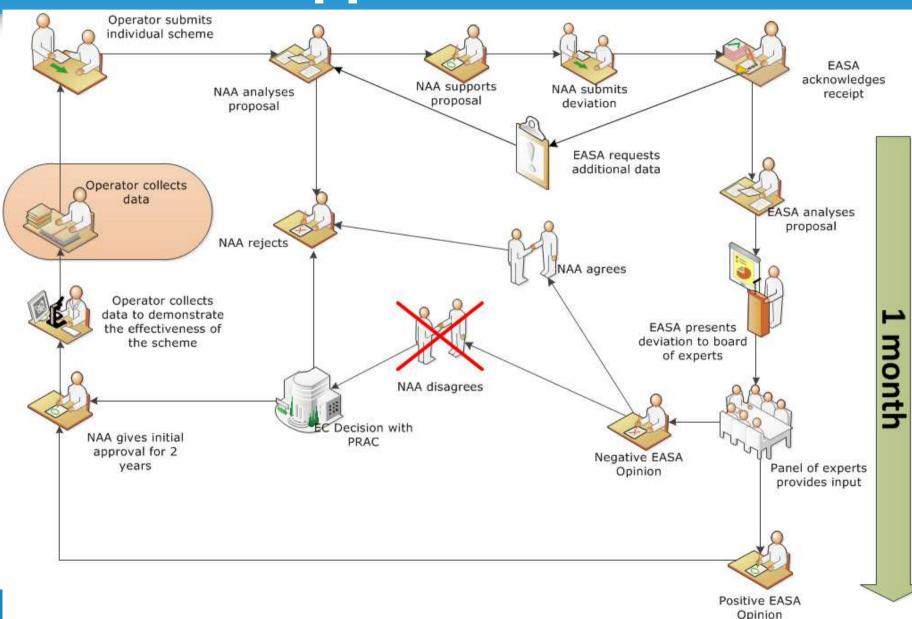
Art. 22(2)

• 1 month

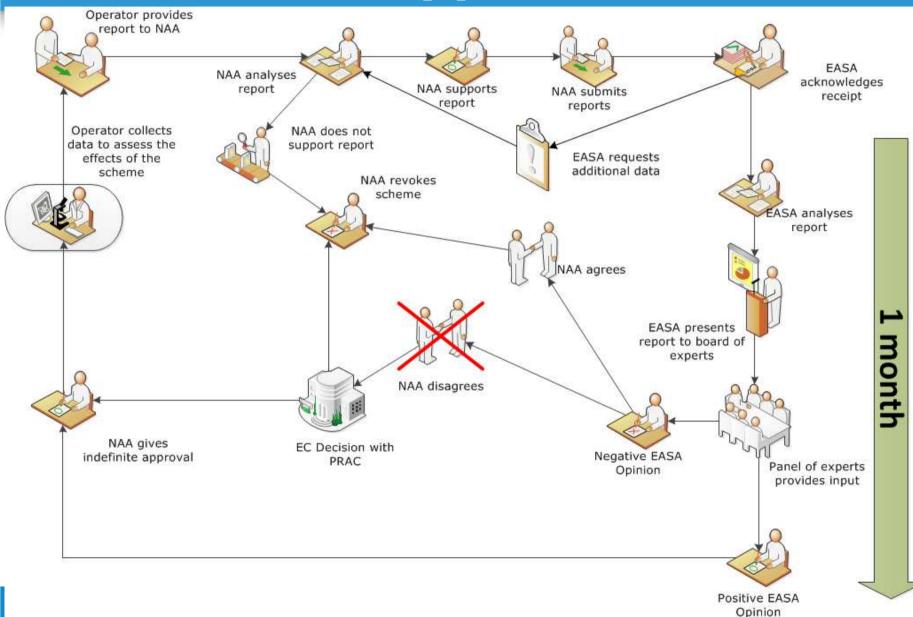
Art. 14(6)

- 2 months EASA
- 1 month PRAC

Workflow Art. 22.2 Initial approval

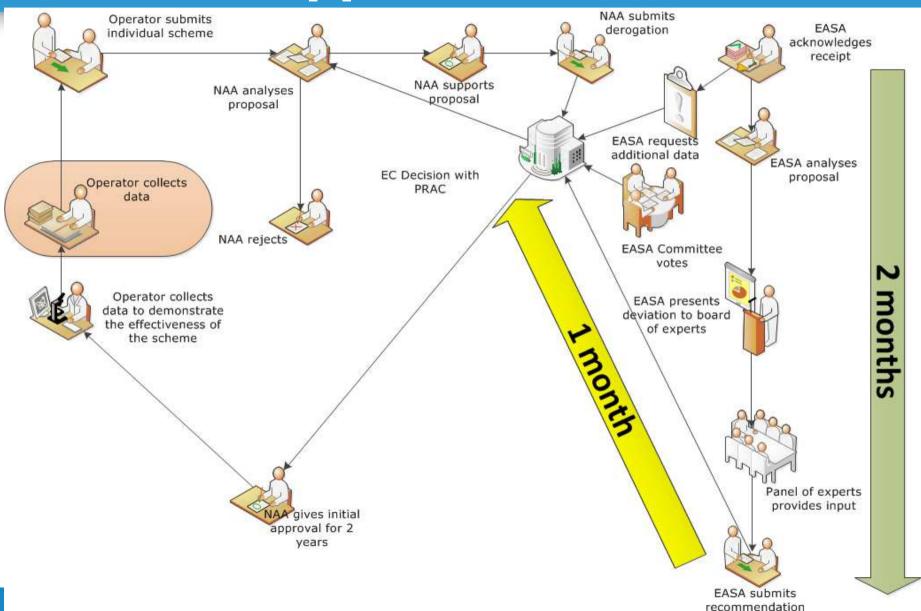


Workflow Art. 22.2 Indefinite approval

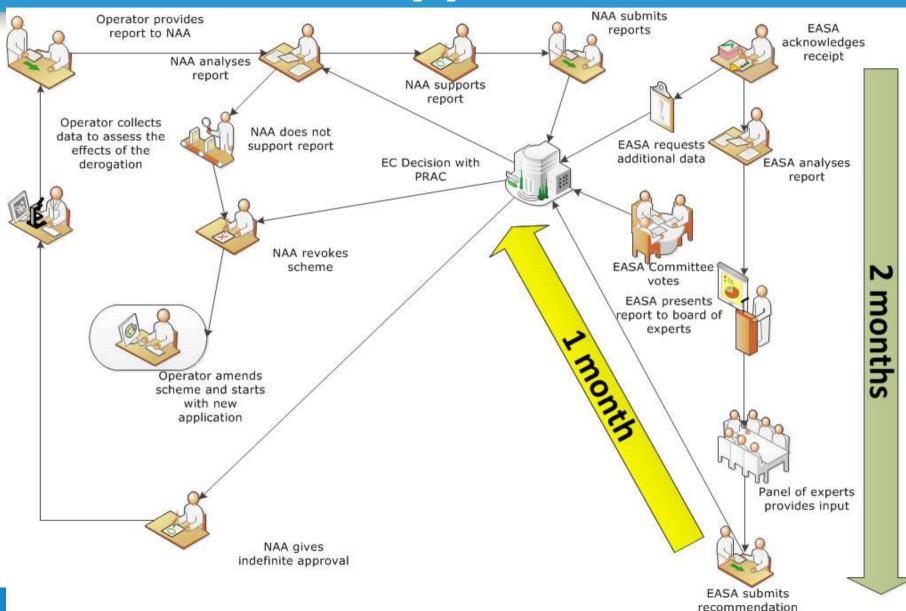


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Workflow Art. 14.6 Initial approval



Workflow Art. 14.6 Indefinite approval



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Composition of panel of experts?

Conflict of interest issues?

At what stage of the process shall the panel be involved?

Tight planning due to time constraints

Summary

Upstream pre-assessment by NAAs paramount

Pool of nominated experts

Expert input to EASA assessment

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