



ECA

European Cockpit Association

EASA FTL/FRM Workshop

Cologne 24 May 2018

Key enablers of FRM

- Data
- Involvement
- Action
- Trust



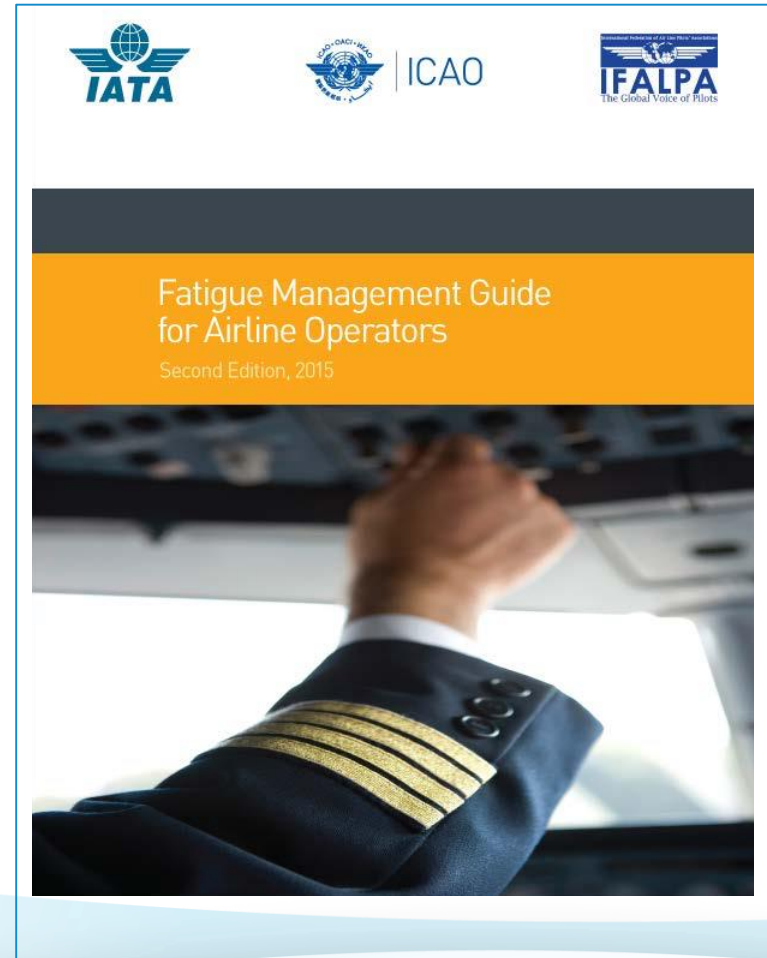
No FRM without Data !

- Fatigue is a hazard
- Risk Assessment completed
 - Start on critical areas (see panel 1)
- Recommendations from FSAG / Safety Deptm. to Safety Review Boards
- Implementation is key
 - If not **acted** on => FRM collapses
- Safety Assurance and Performance



FRM: a Data Driven Process

ICAO Fatigue Management Guide for Airline Operators



Data Source

- A key source of data
=> directly from crews
- Very useful => Subjective information from well designed Fatigue Report Forms
... but only works with mature reporting & safety culture!
- Have a complete list of Safety Performance Indicators (SPI) to analyse the data (IATA document)



Data to Analyse



Fatigue Safety Performance Indicators (SPIs): A Key Component of Proactive Fatigue Hazard Identification

I. INTRODUCTION

FRMS processes provide many tools that can be used to manage and mitigate organizational fatigue. Metrics are essential to identify potential areas for additional attention and for monitoring the effectiveness of various fatigue management approaches, including Fatigue Risk Management System (FRMS) processes. These metrics, also known as safety performance

Involvement - stakeholders

ICAO FRM for Operators:

=> ALL Stakeholders must be involved

- Safety Department
- Operations
- Crew Representatives
- Crew Planning
- Others (NAA, Network Planning etc.)



FSAG (Fatigue Safety Action Group)

Any FRM process is Multifaceted

- To be meaningful: at least 6 meetings / year
- Well drafted FSAG guidelines
... to prevent stakeholders from 'drifting'
- Importantly :
 - => provide regular feedback to crews
 - => demonstrate the changes



Trust

We heard this being used in many forums !

Is FRM being facilitated in the real world & with real actions or is just a



ECA FRM Performance Indicator



Fatigue Risk Management (FRM) 'Performance Indicator'

Prescriptive rules within Flight Time Limitations (FTL) have been commonplace in the past. However, with Performance Based Regulation becoming more widespread, Fatigue Risk Management (FRM) is heavily relied upon within EASA's new Subpart FTL. The theory behind this being that every operator will have to identify their hazards and manage them within their own adapted FTL scheme. In the past, these hazards may not have been satisfactorily addressed under generic prescriptive rules.

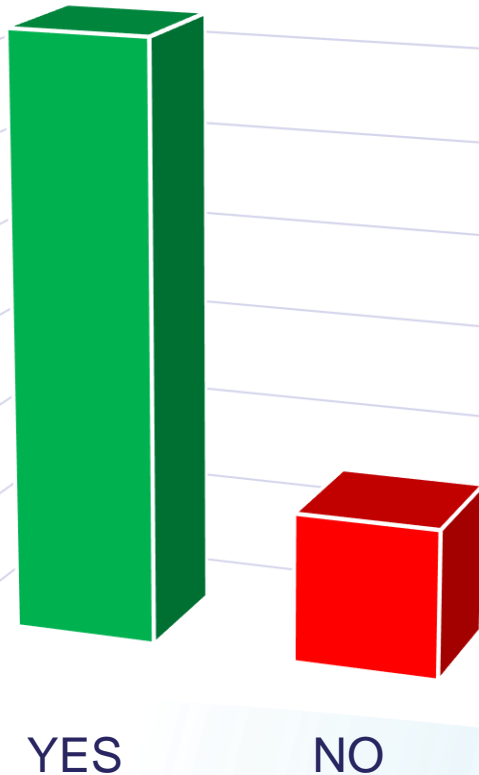
Whilst this may make logical sense, it can allow for some poor practices to become normalised. With this in mind, the ECA have created this benchmarking tool for MA's to use to highlight key areas where an operators fatigue management is working well, whilst also identifying where it is not. This tool will give MA's the opportunity to collectively map out where we all stand regarding the implementation of the new EASA rules as well as giving the power to challenge certain aspects of an operator FRM, where it is identified as falling short of compliance/expectation.

Certain sections of this document introduce a "traffic light" grading system to help ascertain the performance of an operator's FRM. **Green** indicates a very good process; **amber** shows that certain areas need further work/improvement, with **red** indicating a significant issue that is in need of urgent attention to ensure the FRM is fit-for-purpose. In the below table, please alter the colours to reflect your situation.

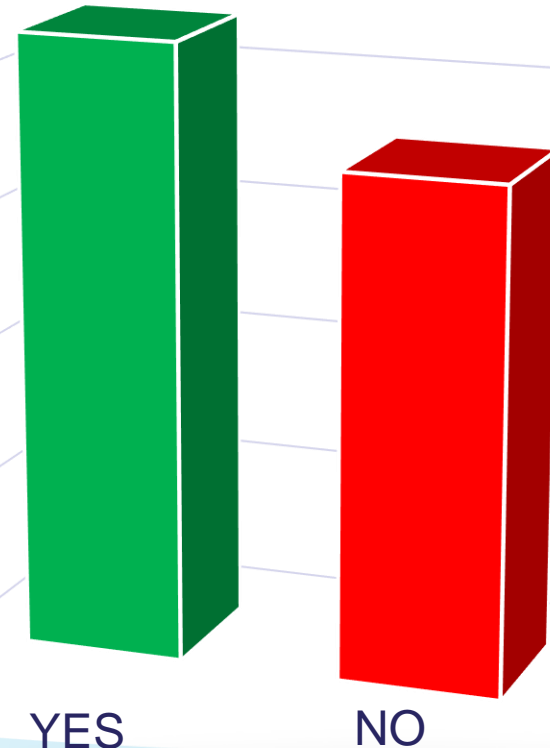
<p align="center">COMPANY NAME / Country</p> <p align="center">.....</p> <p align="center">Pilot Association doing the Benchmark:</p>	
<p align="center">1. Context</p>	
<p>1.1. Does the Company identify and manage fatigue as part of its normal SMS process or do they identify and manage fatigue within a dedicated full <u>Fatigue Risk Management (FRM) process</u>?</p>	<p>SMS or Full FRM</p>
<p>1.2. Did the Company <u>involve pilot representative(s) in the setting up of</u> their FRM process (within the SMS or a dedicated full FRM)?</p>	<p>Yes/No</p>
<p>1.3. Did the Company set up their FRM process in order to benefit from the <u>additional flexibilities</u> under EASA ORO.FTL.205 (FDP, acclimatization) and/or CS.FTL.1.235 (minimum rest)?</p>	<p>Yes/No</p>
<p>1.4. Did the Company set up their FRM process to demonstrate compliance with CS.FTL.1.205 (FDP) to <u>manage</u> the fatiguing effect of <u>night duties of over 10 hours</u> (encroaching 02:00-04:49)?</p>	<p>Yes/No</p>
<p>1.5. Did the Company set up their FRM process in order to <u>obtain a derogation / deviation</u> under Art. 22 (EASA Basic Reg.) or will they be doing so once a full FRM is in place?</p>	<p>Yes/No</p>
<p>1.6. Did the Company <u>involve pilot representatives in the development of the derogation / deviation</u> request to their NAA / EASA?</p>	<p>Yes/No</p>

Current Situation

4.1. Has a FSAG been set up (or equivalent)?



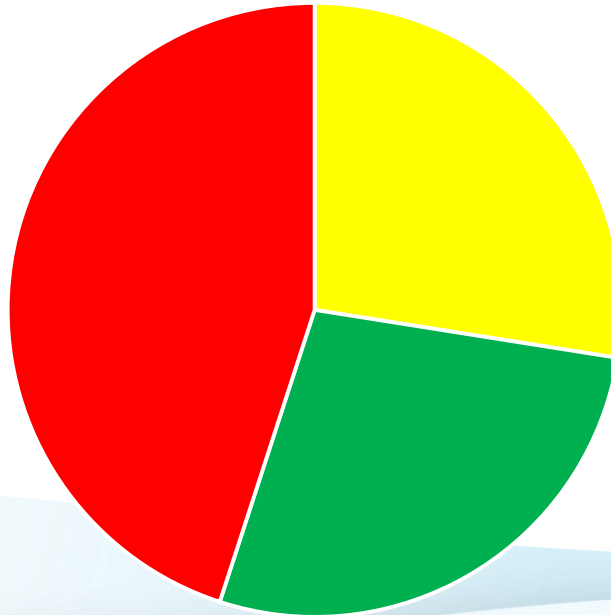
4.3. Do the pilots have representation on the FSAG through their representative body / trade union?



Current Situation Con't

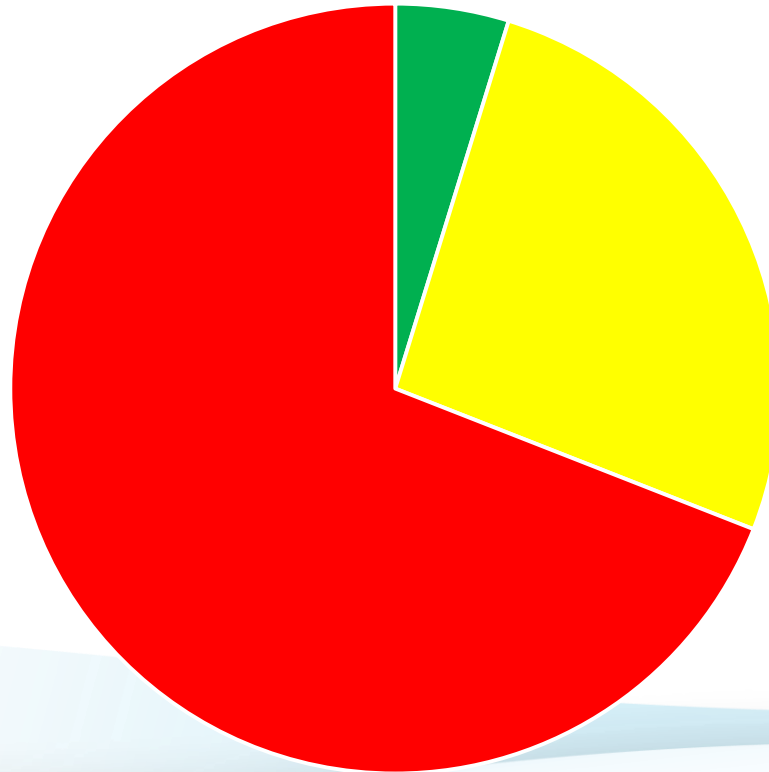
=> Concerning Trend

2.7. Have any pairings or rotations been adjusted due to FRM data?



Current Situation Con't

5.3. Does the Regulator (periodically) consult stakeholders, incl. pilot representatives, on the performance of the FRM and the underlying safety culture?



Enabling FRM Safety



- Data – Data – Data !
- Involve all stakeholders - FSAG
- Take Action:
 - Deliver Results - Get Better - Confront Reality
- Practice Accountability
 - Create Transparency, keep Commitments
build **Trust**