European Union Aviation Safety Agency

FAQ n.47814

FAQs:

ORO.FTL, Part-ORO, Air Operations, Regulations

Question:

Individual crew members' records of flight time and duty periods ORO.FTL.245, (see also ORO.FTL.105):

Answer:

Our employer does not provide individual records of the time spent for e-learning and for certain administrative tasks such as visa renewal.

The purpose of subpart FTL is to mitigate the risks related to fatigue. Therefore, maintaining crew member's records is to ensure compliance with the requirements of that subpart.

A proper implementation of ORO.FTL.245 would fully account for the term 'duty' i.e. any task assigned by the operator must be recorded in crew members' individual records.

The time required for crew training at the behest of the operator and when required by Regulation (EU) No 965/2012 is a duty.

For example, the time needed to complete an e-learning task, if assigned by the operator, is to be notified in advance and recorded as duty time.

The same applies to some ground activities, such as administrative tasks, (including the visa renewal, a second passport when required) or training (briefing or debriefing when required).

Tasks that are part of pilot's individual responsibility such as renewal of the medical certificate need not be rostered or registered.

In accordance with ORO.FTL.245 records of duties are maintained for a period of 24 months. Moreover, in accordance with ORO.MLR.115, records of crew member training, checking & qualifications must be retained for 3 years.

These records are necessary for the operator and crew member to be able to not only account for a particular duty, but also for the cumulative limits stipulated in ORO.FTL.210 (a).

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Link:

https://www.easa.europa.eu/en/faq/47814