

# FTL/FRM INSPECTOR'S CHECKLIST

## SUPPORTING MATERIAL FOR NAAs INSPECTORS

2019



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The document will be reviewed periodically as part of the continuous improvement process. Comments should be forwarded to the address below:

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This document is published on the basis of Article 1(3)(f) of Regulation (EU) 2018/1139 which states that the objectives of that Regulation shall be achieved by, inter alia: 'the uniform implementation of all necessary acts by the national competent authorities and the Agency, within their respective areas of responsibility;'. Of relevance is one of the objectives enshrined in Article 1(2), namely to 'promote cost-efficiency, by, inter alia, avoiding duplication, and promoting effectiveness in regulatory, certification and oversight processes as well as an efficient use of related resources at Union and national level;'

This document is also published in conjunction with Art. 5(3) of Regulation (EU) No 628/2013: "The Agency shall provide competent authorities of Member States with relevant information to support the uniform implementation of the applicable requirements."

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## 1. PURPOSE OF CHECKLIST

EASA has, with the involvement of FTL/FRM experts from Member States competent authorities, developed the following checklists to be used by NAA inspectors to ensure a standardised approach to:

- Part #1 - Assessing compliance with ORO.FTL.110 (Operator's responsibilities)
- Part #2 - Approval of operator's IFTSS and assessing operator's continued compliance with Subpart FTL
- Part #3 - Assessing compliance with ORO.FTL.120 (FRM) (*to be published in Q4 2020*)

This checklist is not only built upon FTL prescriptive limits, but also adds a risk- and performance-based approach with regard to the requirements concerning the operator's SMS and FRM.

Member States may complement the checklists in order to address national specificities.

## 2. HOW TO USE

These checklists should be used by NAAs inspectors to check operator's documented procedures and actual practices and to compare them where necessary when carrying out onsite inspections and audits.

The inspector should carry out the necessary checks before assessing whether the main conclusion (marker) is wholly or partially true or false or does not apply.

## 3. REFERENCES

Part ORO, Subpart GEN; Subpart FTL

#### 4. FLIGHT TIME LIMITATION (FTL) INSPECTOR 'S CHECKLIST

##### 4.1. Part 1 - Assessing compliance with operator's responsibilities (ORO.FTL.110), including management system responsibilities (ORO.GEN.200)

Ref:	Marker and verification	How is it achieved?	Remarks <i>e.g. a finding is made; action items to be closed by...; or must be monitored</i>
ORO.FTL.110 a)	<i>'publish duty rosters sufficiently in advance to provide the opportunity for crew members to plan adequate rest'</i>		
1.	<p><b>The operator prepares duty rosters sufficiently in advance with planning of recurrent extended recovery rest periods and notification of the crew members well in advance to plan adequate pre-duty rest.</b></p> <p><b>AMC1 ORO.FTL.110</b></p> <p>→ Check if the operator publish duty rosters at least 14 days in advance or, alternatively, in less than 14 days advance under an approved AltMOC to AMC1 ORO.FTL.110 (a).</p> <p>→ Check if the operator's published rosters include the following:</p> <ul style="list-style-type: none"> <li>– DPs (duties times);</li> <li>– Flight Duty Periods (FDPs);</li> <li>– Extended Recovery Rest Periods (ERRPs);</li> <li>– Standby availability times,</li> <li>– Rest periods; and</li> <li>– Reserve availability times</li> </ul> <p>→ Check if, in the case of AltMOC, that AltMOC includes mitigations aimed to ensure that crew members have an opportunity to plan adequate rest.</p> <p>⇒ Check if those mitigations in are implemented in practice.</p> <p>⇒ Check if the operator assess the effectiveness of those mitigations.</p> <p><i>Examples of metrics for monitoring roster publication that may be used by the operator:</i></p> <ul style="list-style-type: none"> <li>▪ Number of reports (sick, not fit for duty, fatigue) associated with inadequate rest because of late publication of rosters, below a specified threshold,</li> <li>▪ Number of reports pointing to the lack of mitigation as per the AltMOC.</li> </ul>	<input type="checkbox"/> yes, fully <input type="checkbox"/> yes, partially <input type="checkbox"/> no	
2.	<p><b>The operator proactively manages the subsequent changes in the published rosters and their impact on aircrew under the operator's safety risk management – management of change function</b></p> <p><b>AMC1 ORO.GEN.200(a)(3) (e)</b></p> <p>→ Check if the operator identifies roster changes as hazards that may have an adverse effect on fatigue.</p> <p>⇒ Check if the operator's existing hazard identification, risk assessment and mitigation processes deal with roster changes and their impact on aircrew in a given period.</p>	<input type="checkbox"/> yes, fully <input type="checkbox"/> yes, partially <input type="checkbox"/> no <input type="checkbox"/> n/a	

	<p>→ Check if the operator's OM-A includes a minimum period of time for notification of roster changes to allow the crew member to plan adequate rest.</p> <p>→ Check for correct implementation of the operator's policy on roster changes:</p> <ul style="list-style-type: none"> <li>– by interviewing the crew scheduling personnel for their awareness of the policy;</li> <li>– by verifying at least 5 individual FC and 5 individual CC rosters for changes (if at least 3 out of 5 rosters are not in accordance with operator's policy, for example with the notification time, a deeper analysis should be made);</li> <li>– by interviewing the crew scheduling personnel about the proactive tools they use to assess whether the change would affect the crew opportunity for adequate rest;</li> <li>– by verifying aircrew training records for fatigue management training in accordance with AMC1 ORO.FTL.250</li> <li>– by establishing if the operator uses any performance metrics to monitor roster changes</li> </ul> <p><i>Examples of metrics that may be used by the operator for roster changes:</i></p> <ul style="list-style-type: none"> <li>▪ % change in flights from publication to actual, below threshold</li> <li>▪ % crew keeping the original rostered duty close to target</li> <li>▪ Number of days-off removed from roster, below threshold</li> <li>▪ Number of changes without proper notification, below threshold</li> <li>▪ Number of reports pointing to reduce rest due to roster change below threshold</li> </ul>		
3.	<p><b>The operator proactively manages roster changes on the day of operation.</b></p> <p>→ Check if the operator has a documented procedure for managing on-the-day changes, including re-planning of rostered duties, for example by using buffer aircrew resources, delayed reporting, breaks (split duty) or otherwise.</p> <p>→ Check if the operator takes into account the originally rostered daily FDP, actual number of sectors and crew configuration when re-planning.</p> <p><i>Examples of metrics for roster changes that may be used by the operator :</i></p> <ul style="list-style-type: none"> <li>▪ <i>Number of re-routes below threshold</i></li> <li>▪ <i>Number of aircraft swaps below threshold</i></li> <li>▪ <i>Number of unscheduled breaks below threshold</i></li> <li>▪ <i>Number of reports associating the change to a fatigue event</i></li> </ul>	<p><input type="checkbox"/> yes, fully</p> <p><input type="checkbox"/> yes, partially</p> <p><input type="checkbox"/> no</p> <p><input type="checkbox"/> n/a</p>	
ORO.FTL.110 b)	<p><i>'ensure that flight duty periods are planned in a way that enables crew members to remain sufficiently free from fatigue so that they can operate to a satisfactory level of safety under all circumstances'</i></p>		

<p>4.</p>	<p><b>The operator ensures a fair balance between its commercial needs and the capacity of individual crew members to work effectively.</b></p> <p><b>AMC1 ORO.FTL.110</b></p> <p>→ Check if the operator's documented rostering policy and procedures are tailored to the type and scope of operation and fatigue risk exposure.</p> <p>→ Check if the applicable legal requirements and operator's rostering policy and procedures are reflected in the operator's roster planning tool/software.</p> <p>→ Check if planned FDPs allow for buffers to the maximum permitted FDPs.</p> <p>→ Check if the operator provides for specific mitigation measures in its rostering policy to address fatiguing duties such as: FDPs with extensions; FDPs with WOCL encroachment; training flights, consecutive duties etc., as applicable.</p> <p>→ Check if the operator measures the effectiveness of those mitigation measures</p> <p>→ Check if the operator uses performance metrics to monitor and measure flight duty periods in terms of their duration, workload, WOCL encroachment and consecutiveness.</p> <p><i>Examples of metrics that may be used by the operator:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Number of night FDPs &gt; 10h per crew member per week below threshold</i></li> <li>▪ <i>Number of FDPs &gt; 13h per crew member per week below threshold</i></li> <li>▪ <i>Number of FDPs &gt; 5 sectors below threshold</i></li> </ul>	<p><input type="checkbox"/> yes, fully</p> <p><input type="checkbox"/> yes, partially</p> <p><input type="checkbox"/> no</p> <p><input type="checkbox"/> n/a</p>	
<p>5.</p>	<p><b>The operator verifies and monitors that aircrew who work on a freelance or part-time basis meet flight and duty time limitations and rest requirements</b></p> <p><b>ORO.FC.100; ORO.CC.110</b></p> <p>→ Check if the operator has a documented process for verification and monitoring of duty periods, flight time and rest times of freelance or part-time aircrew.</p> <p>→ Check an individual roster of a free-lance or part time aircrew.</p>	<p><input type="checkbox"/> yes, fully</p> <p><input type="checkbox"/> yes, partially</p> <p><input type="checkbox"/> no</p> <p><input type="checkbox"/> n/a</p>	
<p>ORO.FTL.110 c)</p>		<p><i>'specify reporting times that allow sufficient time for ground duties'</i></p>	

6.	<p><b>The operator ensures that reporting times take into account the time necessary for the completion of ground duties.</b></p> <p>→ Check if the operator has specified in the OMA reporting times for FC as well as for CC, taking into account the type of operation (ex. Charter; scheduled; short haul; long haul), the aircraft type and the reporting airport conditions. (GM1 ORO.FTL.205 (a)(1)).</p> <p>→ Check if the operator has specified in the OMA reporting times for completion of travelling procedures before aircrew positioning (e.g. registration of passengers and baggage, security checks, etc.) according to the mode of transportation (e.g. airplane, rail).</p> <p>→ Check if the operator uses metrics to monitor and measure the time necessary for ground duties, in particular <i>pre-flight duties</i> (briefings; provision of documentation; commuting to the aircraft parking) and <i>pre-departure duties</i> (on-board security checks; boarding; fuelling; loadsheet; aircrew briefing; pre-departure checklists).</p> <p><u>Examples of metrics that may be used by the operator:</u></p> <ul style="list-style-type: none"> <li>▪ <i>Number of exceedances pre-flight and pre-departure times, below threshold</i></li> <li>▪ <i>Number of FDP exceedances due to longer pre-flight and pre-departure times, below threshold</i></li> <li>▪ <i>Number of crew reporting insufficient time for pre-flight and pre-departure duties</i></li> <li>▪ <i>Minimum turnaround time planned v. actual</i></li> </ul>	<input type="checkbox"/> yes, fully <input type="checkbox"/> yes, partially <input type="checkbox"/> no	
ORO.FTL.110 d)	<i>'take into account the relationship between the frequency and pattern of flight duty periods and rest periods and give consideration to the cumulative effects of undertaking long duty hours combined with minimum rest periods'</i>		
7.	<p><b>The operator ensures adequate recovery for, in particular, frequent FDPs, consecutive FDP with different starting times and long duty periods combined with minimum rest periods.</b></p> <p>→ Check if the rostering rules/procedures established by the operator provide for an even distribution of flight duty periods. (AMC1 ORO.FTL.110 (a))</p> <p>→ Check if the operator's rostering rules/procedures provide for additional recovery time following consecutive FDPs, in particular when they start at different times of the day.</p> <p>→ Check if the operator's rostering rules/procedures provide for additional recovery time after rotations with extended FDP, time zone crossings, backward transitions, etc.</p> <p>→ Check if the operator uses performance metrics for monitoring and measuring the even distribution of FDPs over a given period of time.</p> <p><u>Examples of metrics that may be used by the operator:</u></p> <ul style="list-style-type: none"> <li>▪ <i>Ratio days on/days off close to target</i></li> <li>▪ <i>Ratio FDP/rest period close to target</i></li> <li>▪ <i>A limit on the days on/days off</i></li> </ul>	<input type="checkbox"/> yes, fully <input type="checkbox"/> yes, partially <input type="checkbox"/> no <input type="checkbox"/> not applicable	

	<ul style="list-style-type: none"> <li>▪ <i>Number of fatigue reports due to insufficient rest between consecutive duties</i></li> <li>▪ <i>Number of early starts after a day off, below threshold</i></li> </ul>		
ORO.FTL.110 e)	'allocate duty patterns which avoid practices that cause a serious disruption of an established sleep/work pattern, such as alternating day/night duties'		
8.	<p><b>The operator ensures that duties in a duty block maintain an established sleep/work pattern.</b></p> <p><b>AMC1 ORO.FTL.110</b></p> <ul style="list-style-type: none"> <li>→ Check if the operator's rostering policy/procedures provide for maintaining stable sleep/work patterns</li> <li>→ Check if the operator has a process to monitor disruptive practices in terms of their effect on crew member fatigue</li> <li>→ Check at least 5 individual FC and 5 individual CC rosters for disruptive practices and if detected, check how the operator's SMS has mitigated the fatiguing effect of those practices.</li> <li>→ Check if the operator uses performance metrics for monitoring and measuring the disruptive practices.</li> </ul> <p><u>Examples of metrics that may be used by the operator:</u></p> <ul style="list-style-type: none"> <li>▪ <i>% change in FDP starting times in a duty block, below threshold</i></li> <li>▪ <i>Ratio planned FDPs / actual FDPs</i></li> <li>▪ <i>Number of alternating day/night duties in a duty block, below threshold</i></li> <li>▪ <i>Number of alternating Eastward-Westward or Westward-Eastward transitions in a duty block, below threshold</i></li> <li>▪ <i>Number of transitions from a late finish/night duty to an early start in a duty block, below threshold</i></li> </ul>	<input type="checkbox"/> yes, fully <input type="checkbox"/> yes, partially <input type="checkbox"/> no <input type="checkbox"/> not applicable	
ORO.FTL.110 f)	'comply with the provisions concerning disruptive schedules in accordance with ARO.OPS.230'		
9.	<p><b>The operator's IFTSS comply with the 'early' or 'late' schedule type as declared by the CA.</b></p> <p><b>ARO.OPS.230</b></p> <ul style="list-style-type: none"> <li>→ Check if the IFTSS of the operator is in line with the NAA's determination.</li> </ul>	<input type="checkbox"/> yes, fully <input type="checkbox"/> yes, partially <input type="checkbox"/> no	
ORO.FTL.110 g)	'provide rest periods of sufficient time to enable crew members to overcome the effects of the previous duties and to be rested by the start of the following flight duty period'		
10.	<p><b>The operator ensures that rest periods allow aircrew to recover from transient and cumulative fatigue and be rested prior to undertaking the next FDP.</b></p>	<input type="checkbox"/> yes, fully <input type="checkbox"/> yes, partially	

	<p>→ Check if operator's rostering policy/procedures provide for the allocation of sufficient rest periods, especially after long flights crossing time-zones.</p> <p>→ Check if the operator's rostering policy/procedures provides for the placement of the rest period /sleep opportunity during the optimal sleep time window.</p> <p>→ Check if the operator has means to ensure that the crew member is sufficiently rested for duty when called from other-standby or reserve:</p> <p>⇒ Check if the operator's rostering policy/procedures only allow for the use the standby availability period to place a call for duty.</p> <p>⇒ Check if the operator's OM-A stipulates a maximum duration of other-standby taking into account the type of operation and the impact of the time spent on standby on the duty that may be assigned.</p> <p>⇒ Check if the operator's OM-A specifies that any duty can be assigned out of standby or reserve, including extended duties.</p> <p>(CS FTL 1.225 ; CS FTL 1.230)</p> <p>→ Check if the operator's roster department performs an extra calculation of cumulative fatigue after a roster change of a day off into a duty period.</p> <p><i>Examples of metrics that may be used by the operator:</i></p> <ul style="list-style-type: none"> <li>▪ % of the sleep opportunities covering local night (2200 - 0800 LT) close to target;</li> <li>▪ % of minimum rest periods, below threshold</li> <li>▪ % of rest periods completely outside WOCL, below threshold</li> <li>▪ Number of fatigue reports due to insufficient rest</li> <li>▪ Number of single days free of duty</li> </ul>	<input type="checkbox"/> no	
<b>ORO.FTL.110 (h)</b>	<i>'plan recurrent extended recovery rest periods and notify crew members sufficiently in advance'</i>		
<b>11.</b>	<p><b>The operator ensures that the recurrent extended recovery rest periods (ERRPs) are planned and notified to aircrew in advance.</b></p> <p>→ Check if the operator publish duty rosters at least 14 days in advance in accordance with ORO.FTL.110(a), including recurrent extended recovery rest periods</p> <p>→ Check if the notification time is included in the OMA.</p>	<input type="checkbox"/> yes, fully <input type="checkbox"/> yes, partially <input type="checkbox"/> no	
<b>ORO.FTL.110 (i)</b>	<i>'plan flight duties in order to be completed within the allowable flight duty period taking into account the time necessary for pre-flight duties, the sector and turnaround times'</i>		
<b>12.</b>	<p><b>The operator ensures that realistic times for pre-flight duties, taxiing, sector and turnaround are taken into account for the purpose of planning FDPs.</b></p>	<input type="checkbox"/> yes, fully <input type="checkbox"/> yes, partially <input type="checkbox"/> no	

	<p>→ Check whether airport infrastructure and specific traffic conditions (i.e. congested aerodromes such as New York JFK; London LHR; Paris CDG) are taken into account when planning.</p> <p>→ Check if the operator has a process to monitor actual pre-flight, travelling and post flight times and the time for physiological needs.</p> <p><b>Examples of metrics that may be used by the operator:</b></p> <ul style="list-style-type: none"> <li>▪ City pair exceedances in the planned FDPs on a monthly basis due to traffic congestion and/or airport infrastructure</li> <li>▪ Number of delays &gt; 15 min</li> <li>▪ Number of delays &gt; 1 hour</li> <li>▪ Minimum turnaround time planned v. actual</li> <li>▪ Average duration of exceedances</li> </ul>		
<b>ORO.FTL.110 (j)</b>	<b>'change a schedule and/or crew arrangements if the actual operation exceeds the maximum flight duty period on more than 33% of the flight duties in that schedule during a scheduled seasonal period'</b>		
13.	<p><b>The operator assess the stability of its rostering system and changes schedules and/or crew arrangements, if the actual operation exceeds the maximum flight duty period on more than 33% of the flight duties during a scheduled seasonal period.</b></p> <p>→ Check if the operator has a process to monitor the realism of planned rosters on a seasonal basis and especially if the actual duties exceed the maximum FDP on more than 33% of the cases during a scheduled seasonal period.</p> <p>→ Check if the operator has established performance metrics for operational robustness of rosters. AMC1 ORO.FTL.110(j)</p> <p><b>Examples of metrics that may be used by the operator:</b></p> <ul style="list-style-type: none"> <li>▪ % of FDPs planned v actual close to target</li> <li>▪ Number of FDP extended through CD</li> <li>▪ Difference between planned and actual flight hours</li> <li>▪ Difference between planned and actual duty hours</li> <li>▪ Difference between planned and actual number of days off</li> <li>▪ Number of unscheduled overnights;</li> <li>▪ Number of roster changes per scheduled seasonal period</li> <li>▪ Changes of schedule carried out after published roster</li> </ul>	<input type="checkbox"/> yes, fully <input type="checkbox"/> yes, partially <input type="checkbox"/> no	
<b>ORO.GEN.200</b>	<b>Safety risk management</b>		
14.	<p><b>The operator's safety risk management processes and management structures in accordance with ORO.GEN.200 are used to manage fatigue.</b></p> <p><b>The Operator ensures that, within their operation, fatigue risks are: commensurate to the operation (e.g. long distance ops, night ops,</b></p>	<input type="checkbox"/> yes, fully <input type="checkbox"/> yes, partially <input type="checkbox"/> no	

	<p><b>multiple sectors etc.; identified and assessed; monitored and controlled.</b></p> <p><b>AMC1 ORO.GEN.200(a)(3)</b></p> <ul style="list-style-type: none"> <li>→ Check if the operator's responsibilities are being managed by a department that is independent from the pressures of commercial or industrial influence.</li> <li>→ Check if the operator has incorporated in its SMM or otherwise all relevant aspects of fatigue management, including the policy, objectives, procedures, processes and individual responsibilities with regard to flight crew and cabin crew fatigue. (AMC2 ORO.GEN.200(a)(5))</li> <li>→ Check if crew member's fatigue is indicated as a hazard on the operator's hazard log and how the operator is monitoring fatigue throughout its operations.</li> <li>→ Check if the operator has a system in place allowing crew members to report fatigue (ASR / specific Fatigue reporting form) : <ul style="list-style-type: none"> <li>⇒ Check if the operator receives information regarding reporting times, changes, long duties, disruptive schedules.</li> <li>⇒ Check if the fatigue reports are trended against (associated with) route, duty pattern and individual.</li> <li>⇒ Check who assesses the fatigue report forms? Are they sent to the safety department?</li> <li>⇒ Check if there is a mechanism in place to give feedback to the reporter?</li> </ul> </li> <li>→ Check if the operator collects data and use appropriate metrics to monitor aircrew fatigue levels.</li> <li>→ Check if fatigue risk mitigations and controls are being verified / audited to confirm their effectiveness.</li> </ul> <p><i>Examples of metrics that may be used by the operator:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Ratio proactive/reactive reports</i></li> <li>▪ <i>Distribution of root causes of submitted fatigue reports</i></li> <li>▪ <i>Fatigue report filing rate</i></li> <li>▪ <i>Timely closure of action items stemming from fatigue reports</i></li> </ul>		
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<p>ORO.FTL.200 CS FTL.1.200 ORO.FTL.245(a)(1)(iv)</p>	<p>2. Home base</p>		
<p>2.</p>	<p><b>The Operator complies with the requirements for assignment, change and recording of home base.</b></p> <ul style="list-style-type: none"> <li>→ Check if the operator has a list of home bases it operates from in the OM. ⇒ those home bases must be single airport locations assigned with a high degree of permanence. ⇒ check during audits a sample of worked rosters that a dual basing does not occur by comparing the assigned homebase with the applicable rest time or by checking the assigned homebase in the roster department software.</li> <li>→ Check if the operator OM provides for maintaining a record of the home bases to which the crew are assigned. ⇒ check during audits that such record exist.</li> <li>→ Check if the roster department software is updated accordingly.</li> <li>→ Check if the operator's change of home base procedure provides for a 72 hrs (3 local nights) extended recovery rest period prior to starting duty at the new home base. ⇒ traveling between former and new home base is positioning. ⇒ check during audits that the required rest period has been allocated and travelling between former and new home has been considered as positioning.</li> <li>→ Check if the operator recommends to their crew members that they should use a place of rest within 90 minutes travelling time of their assigned Home base.</li> </ul>	<p><input type="checkbox"/> yes, fully <input type="checkbox"/> yes, partially <input type="checkbox"/> no</p>	
<p>ORO.FTL.205 AMC1 ORO.FTL.205(f) GM1 ORO.FTL.205(a)(1) CS FTL.1.205 GM1 CS FTL.1.205(a)(2) GM1 CS FTL.1.205(c)(1)(ii) GM1 CS FTL.1.205(d)</p>	<p>3. Flight Duty Period</p>		
<p>3.1</p>	<p><b>The operator has specified reporting times appropriate to each individual operation considering the size and type of aircraft and the reporting airport conditions.</b> <b>ORO.FTL.205(a)(1); GM1 ORO.FTL.205(a)(1)</b></p> <p><b>The reporting times specified by the operator for the cabin crew take into account the length of pre-flight briefing of the cabin crew.</b> <b>ORO.FTL.205(c)</b></p> <ul style="list-style-type: none"> <li>→ Check if the OM-A specifies reporting times that ensure sufficient time for ground duties such as pre-flight duties (briefings; provision of documentation; commute to aircraft parking) and pre-departure duties (on-board security checks; passenger boarding; fueling; loadsheet; aircrew briefing; pre-departure check lists) taking into account the size and type of aircraft and/or airport.</li> <li>→ Ask the operator how they assess that these reporting times ensure sufficient time for ground duties.</li> <li>→ Check if the operator has specified different/extended reporting times for e.g. long distance flights.</li> <li>→ Check if the difference between the reporting times for FC and CC does</li> </ul>	<p><input type="checkbox"/> yes, fully <input type="checkbox"/> yes, partially <input type="checkbox"/> no</p>	

	not exceed 1 hour.		
3.2	<p><b>The operator' procedure for the use of commander's discretion (CD) in the case of unforeseen circumstances beyond the operator's control meets the applicable requirements.</b> <b>ORO.FTL.205 (a)(2); ORO.FTL.205 (f); AMC1 ORO.FTL.205(f)</b></p> <ul style="list-style-type: none"> <li>→ Check if the OM-A contains the operator's policy on CD. <ul style="list-style-type: none"> <li>⇒ The policy has to account for the shared responsibility of management, flight and cabin crew in the case of unforeseen circumstances.</li> <li>⇒ The policy has to state the safety objectives and account for factors that might decrease a crew member's alertness levels.()</li> <li>⇒ The policy has to state the non-punitive nature of the use of commander's discretion.</li> <li>⇒ The policy should include guidance to pilots as to what type of events fall under 'unforeseen circumstances' in the context of commander's discretion. For example, in view of the ICAO definition of 'unexpected conditions', unforeseen circumstances in flight operations for the purpose of ORO.FTL.205(f) may be events that could not reasonably have been predicted and accommodated, such as adverse weather, equipment malfunction or airtraffic delay, which may result in necessary on-the-day operational adjustments.</li> <li>⇒The policy should include guidance to pilots that commanders discretion should be avoided at home base.</li> </ul> </li> <li>→ Check if the operator includes sufficient margins in rostered FDPs so that commanders do not exercise discretion as a matter of routine.</li> <li>→ Check during audits how the operator assesses pairings where commander's discretion has been exercised?</li> <li>→ Check if the OM-A contains a procedure specifying how the commander can increase the maximum FDP for the actual number of sectors and the crew configuration and/or reduce the rest period following that FDP. <ul style="list-style-type: none"> <li>⇒the rest period must not be less than 10 hours.</li> <li>⇒ The procedure shall instruct the commander to consult all crew members on their alertness status before applying commander's discretion.</li> </ul> </li> <li>→ Check if the OM-A contains a procedure specifying how the commander can reduce the actual FDP and/or increase the rest period following that FDP. <ul style="list-style-type: none"> <li>⇒ The procedure shall instruct the commander to consult all crew members on their alertness status before applying commander's discretion.</li> </ul> </li> <li>→ Check if the OM-A contains an instruction to the commander to report cases of discretion to the operator. <ul style="list-style-type: none"> <li>⇒ Does the operator provide adequate training to flight crew members on reporting cases of discretion to the operator?</li> <li>⇒How does the operator ensure that all cases of commander's discretion are recorded and reports are submitted in a timely manner.</li> <li>⇒Does the operator specify in their Policy the timescales for submitting a commander's discretion report form?</li> </ul> </li> <li>→ Check if the operator has a procedure how to collect the CD reports and use them for the purpose of evaluating the roster robustness. (ORO.FTL.110 (j))</li> <li>→ Check if the OM-A contains a procedure for reporting cases of discretion, whereby the FDP is increased or rest period is reduced by more than 1 hour, to the competent authority. <ul style="list-style-type: none"> <li>⇒The operator must add its comments and ensure that these reports are submitted to the competent authority not later than 28 days after the</li> </ul> </li> </ul>	<input type="checkbox"/> yes, fully <input type="checkbox"/> yes, partially <input type="checkbox"/> no	

	<p>event.</p> <ul style="list-style-type: none"> <li>→ Check if augmented crew are used for all cases of commander's discretion of over 2 hours .</li> <li>→ Check during audits a sample of rosters if no more than 3 hours commander's discretion is used.</li> <li>→ When commander's discretion is applied to the maximum daily FDP with extensions without in-flight rest, check that Table 2 of ORO.FTL.205(b) is used to calculate the limits of commander's discretion.</li> </ul>		
3.3	<p><b>Operator's defined FDP limits are commensurate to the type(s) of operation and comply with the applicable tables.</b> <b>ORO.FTL.205 (b)(1),(2) and (3); CS FTL.1.205 (b) and (c)</b></p> <ul style="list-style-type: none"> <li>→ Check if the OM-A contains FDP limits appropriate to the intended operations. <ul style="list-style-type: none"> <li>⇒ If the operator conducts operations with acclimatised crew members only as well as with extensions without in-flight rest, the OM-A must contain the FDP limits of Table 2 of ORO.FTL.205 (b)(1) and the Table of CS FTL.1.205 (b)), respectively.</li> <li>⇒ If the operator conducts operations with unacclimatised crew members, the OM-A must include the FDPs limits of Table 3 of ORO.FTL.205 (b)(2).</li> <li>⇒ If the operator conducts long haul operations with in-flight rest and intends to apply extensions to the FDPs due to in-flight rest, the OM-A must contain the FDP limits of CS FTL.1.205 (c)(2) and (3)).</li> </ul> </li> <li>→ Check if the operator's OM-A provides for the establishment of aircrew acclimatisation in accordance with Table 1 of ORO.FTL.105(1) as a minimum.</li> <li>→ If the operator intends to apply Table 4 of ORO.FTL.205 (b)(3) for crew members in an unknown state of acclimatisation, it must first submit evidences for compliance of its FRM with ORO.FTL.120, before being approved to apply Table 4. <i>(Note #1: In addition, the operator must provide data (presumptions) from at least two sources (fatigue, sleep, workload or performance) and must establish fatigue thresholds and develop SPI's to monitor them. Note #2: the checklist for assessing operator's compliance with ORO.FTL.120 is contained in Part 3 of this document.)</i></li> <li>→ Check that the used software is programmed accordingly</li> <li>→ Check during audits that actual rosters comply with FDP limits</li> </ul>	<input type="checkbox"/> yes, fully <input type="checkbox"/> yes, partially <input type="checkbox"/> no	
3.4	<p><b>The use of extensions on the maximum daily FDP without in-flight rest meets the applicable requirements.</b> <b>ORO.FTL.205 (d) and CS FTL 1.205(b)</b></p> <ul style="list-style-type: none"> <li>→ Check if the operator's scheduling/planning rules (may be in a different manual) include an advance notification to crew members who are assigned with extended maximum daily FDPs.</li> <li>→ Check if the operator's scheduling/planning rules following an extended FDP provide for an increase of the rest periods. ⇒the preflight rest period &amp; post flight rest periods must be increased by 2 hours or the post flight rest period must be increased by 4 hours ⇒check during audits a sample of rosters that the rest period following an extended FDP has been increased as required.</li> <li>→ Check if the operator's scheduling/planning rules provide for a ban on the combination of various extensions within one FDP period.</li> </ul>	<input type="checkbox"/> yes, fully <input type="checkbox"/> yes, partially <input type="checkbox"/> no	

	<p>→ Check that extensions on the maximum daily FDP without inflight rest are not used more than twice in any 7 consecutive days. ⇒check during audits a sample of rosters that extensions on the maximum daily FDP without inflight rest are not used more than twice in any 7 consecutive days.</p>		
3.5	<p><b>The use of extensions on the maximum daily FDP with in-flight rest meets the applicable requirements.</b> <b>ORO.FTL.205 (e); CS FTL 1.205(c); GM1 CS FTL.1.205(c)(1)(ii)</b></p> <p>→ Check if the operator's OM-A specifies on which route an extension on the maximum FDP due to in-flight rest applies. ⇒ such extensions are only possible if the FC is augmented, the FDP is limited to 3 sectors and each FC and CC use the in-flight rest facility.</p> <p>→ Check if the length of the sectors allow that every crew member on board use the in-flight rest facility during the cruise phase of the flight. Note#1: This also applies in cases where augmented crew is not used at the beginning of the rotation, but later on in the rotation.</p> <p>→ Check during audits a sample of rosters that every crew member is allocated sufficient rest according to CS FTL.1.205 (c)(1)(ii) or, for cabin crew, CS FTL.1.205 (c)(3).</p> <p>→ Check if the in-flight rest is counted as FDP.</p> <p>→ Check if the in-flight rest facilities used by the operator to extend the FDPs have been assessed as compliant with class 1, 2 or 3 rest facility standards of CS FTL 1.205(c). ⇒ the NAA should whenever possible carry out a physical check of whether those facilities meet the standard as stated in the operator's OM.</p> <p>→ Check during audits that no crew members have started a positioning sector to then become part of the operating crew on the same flight when using in-flight rest.</p>	<p><input type="checkbox"/> yes, fully</p> <p><input type="checkbox"/> yes, partially</p> <p><input type="checkbox"/> no</p>	
3.6	<p><b>Operator's procedures for delayed reporting in the case of unforeseen circumstances beyond the operator's control meet the applicable requirements.</b> <b>ORO.FTL.205 (g); CS FTL.1.205(d); GM1 CS FTL.1.205(d)</b></p> <p>→ Check if the operator will practice delayed reporting in actual operations.</p> <p>Where delayed reporting is used:</p> <p>→ Check if the operator has established a procedure for delayed reporting in the OM-A.</p> <p>→ Check if the operator' procedure for delayed reporting provides for the maintaining of relevant records.</p> <p>→ Check if the procedure provides for a method for calculation of the FDP according to the length of delay (less than 4 hrs; more than 4 hrs; more than 10 hrs).</p> <p>→ Check if the delayed reporting procedure provides for:</p> <ul style="list-style-type: none"> <li>○ a method of notification of the delay, at home base or away from base, including the provision of an actual reporting time;</li> <li>○ maximum and minimum notification times that allows a crew member to remain in his/her suitable accommodation when the delayed reporting procedure is activated;</li> <li>○ a method to avoid disturbance of crew members in the case of delays of 10 hours or more.</li> </ul>	<p><input type="checkbox"/> yes, fully</p> <p><input type="checkbox"/> yes, partially</p> <p><input type="checkbox"/> no</p> <p><input type="checkbox"/> n/a</p>	

3.7	<p><b>The assignment of night duties complies with the applicable requirements. CS FTL.1.205(a)(1) and (2); GM1 CS FTL.1.205(a)(2)</b></p> <ul style="list-style-type: none"> <li>→ Check if the maximum FDP for consecutive night duties is set to the limit of 4 sectors per duty.</li> <li>→ Check if the operator's rostering procedures specify the application of appropriate fatigue risk management to long night duties (more than 10hrs) in relation to the duties before and after duties and rest period.</li> </ul>	<input type="checkbox"/> yes, fully <input type="checkbox"/> yes, partially <input type="checkbox"/> no	
ORO.FTL.210 AMC1 ORO.FTL.210(c)	<b>4. Cumulative flight times and cumulative duty periods</b>		
4	<p><b>The establishment of cumulative flight times (FT) and cumulative duty periods (DP) meets the applicable requirements.</b></p> <ul style="list-style-type: none"> <li>→ Check if the operator has specified the minimum time for post flight duties taking into account the type of operation, the size and type of aircraft and the airport conditions.             <ul style="list-style-type: none"> <li>⇒ Ask the operator how they have assessed that the specified minimum time is sufficient for the completion of the post flight duties. Do they monitor this time to ensure the post duty time is adequate?</li> </ul> </li> <li>→ Check if the operator properly applies the definitions of DP, FDP and FT when calculating their respective cumulative values.</li> <li>→ Check if the flight time during a line training is accounted for the purpose of establishing cumulative FT.</li> <li>→ Check if briefing and debriefing for training purposes is accounted for the purpose of establishing cumulative DP.</li> <li>→ Check if the operator has a method to ensure that his flight crew members who perform flight duties, including flight instruction, for more than one operator and/or ATO, comply with ORO.FC.100 and CAT.GEN.MPA.100 b) 4, and 5.</li> <li>→ Check in the OM for provisions how e.g. office duties, ground duties, stand-by duties are considered</li> <li>→ Check during actual audits that office duties, ground duties, stand-by times are considered in the cumulative DP.</li> </ul>	<input type="checkbox"/> yes, fully <input type="checkbox"/> yes, partially <input type="checkbox"/> no	
ORO.FTL.215 ORO.FTL.105(18)	<b>5. Positioning</b>		
5.	<p><b>Operator's procedures for positioning are in compliance with the applicable requirements.</b></p> <ul style="list-style-type: none"> <li>→ Check if the time spent on positioning is counted as duty period according to the IFTSS.</li> <li>→ Check if the time spent to travel from a place of rest or home base to a simulator, at the request of the operator, counts as a duty period.</li> <li>→ Check if the reporting times allow for the completion of the travelling procedures such as registration of passengers and baggage, security checks, etc., depending on the transport mode, when the crew member is positioning.</li> <li>→ Check that positioning after reporting but prior to operating is counted as part of the FDP but is not required to be counted as a sector.</li> </ul>	<input type="checkbox"/> yes, fully <input type="checkbox"/> yes, partially <input type="checkbox"/> no	

	<p>→ If the operator permits, or requires, a crew member to self-position by the means of personally arranged transport directly to another location without initially reporting to home base, check whether the operator has included procedure and instructions in their IFTSS. ⇒ (Note: <i>in any case the procedure must be approved as an AltMoC first before being implemented.</i>)</p>		
<p>ORO.FTL.220 CS FTL.1.220 GM1 CS FTL.1.220(b)</p>	<p>6. <i>Split duty</i></p>		
<p>6.</p>	<p><b>Operator's procedures for split duty are in compliance with the applicable requirements.</b></p> <p>→ Check if the operator will use a break on the ground for the purpose of extension of the maximum FDP (split duty) during its operations. (Note: <i>the use of breaks during the FDP for operation purposes other than for extension of the maximum FDP is not considered 'split' duty for the purpose of ORO.FTL.</i>)</p> <p>Where split duty applies:</p> <p>→ Check if split duties will be planned and notified in advance.</p> <p>→ Check if the IFTSS specifies the minimum duration of a break on the ground. ⇒ the maximum FDP may be extended by 50% of that break period; ⇒ suitable accommodation must be provided in the case of breaks longer than 6 hours.</p> <p>→ Check if the break is accounted for as FDP.</p> <p>→ Check if the break excludes the time for pre- and post-flight duty and travelling, and that these times are established taking into account the aircraft type, type of operation and airport conditions. (Note: Minimum time is 15 minutes for post-flight duties and travelling and 15 minutes for travelling and pre-flight duties).</p> <p>→ Ask the operator how they assess and monitor these times.</p> <p>→ Check during audits a sample of worked rosters that the operator does not use split duty combined with in-flight rest.</p> <p>→ Check during audits a sample of worked rosters that reduced rest has not been used prior to a split duty.</p> <p>→ Check during audits for the actual use of split duty and planning of the necessary extended rest time afterwards.</p>	<p><input type="checkbox"/> yes, fully</p> <p><input type="checkbox"/> yes, partially</p> <p><input type="checkbox"/> no</p> <p><input type="checkbox"/> n/a</p>	
<p>ORO.FTL.225 CS FTL.1.225 GM1 CS FTL.1.225 GM1 CS FTL.1.225(b) GM1 CS FTL.1.225(b)(2)</p>	<p>7. <i>Standby and Duties at the Airport</i></p>		
<p>7.</p>	<p><b>Operator's standby procedures and practices meet the applicable requirements.</b></p> <p>→ Check if the operator's IFTSS specifies the maximum duration of airport standby and FDP, as well as that of standby other than airport standby (other-standby), applicable within their organisation. (Note: <i>Under the obligations of ORO.FTL.110 (b &amp; e), operators must carefully evaluate what duration of standby is safely allowable within their particular operation</i>) ⇒ check during audits a sample of worked rosters that the maximum combined duration of airport standby and assigned FDP during operations</p>	<p><input type="checkbox"/> yes, fully</p> <p><input type="checkbox"/> yes, partially</p> <p><input type="checkbox"/> no</p>	

	<p>has not exceeded 16 hours.</p> <ul style="list-style-type: none"> <li>→ Check if the operator's IFTSS specifies how the maximum FDP that may be assigned during any standby will be reduced after the crew member has spent certain time on standby. ⇒ check during audits a sample of worked rosters that the max. FDP out of airport stand-by/other stand-by is actually reduced according provisions of CS FTL.1.225.</li> <li>→ Check if the operator's IFTSS provides for the advance notification of the standby availability period (start and end time) to the aircrew concerned. ⇒ The IFTSS shall indicate that the operator can only use the rostered standby availability period to place their call for duty. <i>(Note: ORO.FTL.105 (25) defines standby as the period of time during which a crew member is required by the operator to be available to receive an assignment for a flight.)</i> ⇒ check during audits a sample of worked rosters that the start and end times of the standby duty are annotated on the roster.</li> <li>→ Check if the operator's IFTSS specifies a reasonable response time from a call out from other-standby to the reporting time. <i>(Note: The response time between call and reporting time should under normal circumstances allow the crew member to arrive from their place of rest to the reporting point.)</i> ⇒ check during audits a sample of worked rosters that the operator has specified and monitored the response time.</li> <li>→ Check if the operator's IFTSS has a procedure for reporting after the rostered standby period ends. <i>(Note: The response time between call and reporting time may extend beyond the end of originally rostered standby period. )</i></li> <li>→ Check if the operator has one or more procedures designed to prevent situations where the combination of other-standby and FDP assigned during that other-standby does create an "awake" time greater than 18 hours. ⇒ For the design of the procedure(s) the operator should consider, among other things, in what time of the day the standby take place and if at night, whether a minimum of 8 hours' sleep opportunity is provided to the crew member during which s/he is not disturbed.</li> <li>→ Check if the accommodation that will be made available to the crew member on airport standby meets the definition of 'accommodation' as per ORO.FTL.105(3).</li> <li>→ Check if the operator's IFTSS specifies that the rest calculation after airport standby/airport duty followed by an FDP is based on the reporting time for that airport standby/airport duty.</li> <li>→ Check if the operator's IFTSS specifies the minimum rest period following any standby which does not lead to assignment of an FDP.</li> <li>→ Check if the operator specifies that the combination of airport duty and assigned FDP will be counted 100% as FDP from the airport duty reporting time.</li> <li>→ Check if the operator specifies that airport standby is counted 100% as duty period for the purpose of ORO.FTL.210 and ORO.FTL.235.</li> <li>→ Check if the operator's IFTSS specifies the % of time spent on other-standby that will be considered as duty period for the purpose of ORO.FTL.210.</li> </ul>		
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<p>ORO.FTL.230 ORO.FTL.105(20) GM1 ORO.FTL.230(a) CS FTL.1.230 GM1 CS FTL.1.230 GM2 CS FTL.1.230 GM1 CS FTL.1.230(c)</p>	<p>8. Reserve</p>		
<p>8.</p>	<p><b>Operator's reserve procedures and practices meet the applicable requirements.</b></p> <p>→ Check if the operator intends to assign crew members to reserve.</p> <p>Where reserve process applies:</p> <p>→ Check if the operator's IFTSS provides for rostering of reserve. (Note: A reserve period may not retrospectively be considered as part of a recurrent extended recovery rest period.)</p> <p>→ Check if the operator's IFTSS specifies the maximum duration of a single reserve period and the number of reserve periods that can be consecutively assigned within 168 hours or less.</p> <p>→ Check if the operator's IFTSS includes a notification process of at least 10 hrs for a duty assignment out of reserve. (Note: the notification process should avoid interference with normal sleeping patterns, where possible.)</p> <p>→ Check if the operator's reserve process includes a 8-hour sleep opportunity within each reserve day where the crew member cannot be contacted. (Note#1: the 8 hrs sleep opportunity may overlap with the minimum notification period of 10 hours. Note#2: the 8 hrs are meant to run consecutively; the whole reserve period must be in the roster before any duty assignment take place.</p>	<p><input type="checkbox"/> yes, fully</p> <p><input type="checkbox"/> yes, partially</p> <p><input type="checkbox"/> no</p> <p><input type="checkbox"/> n/a</p>	
<p>ORO.FTL.235 AMC1 ORO.FTL.235(b) CS FTL.1.235 GM1 CS FTL.1.235(b)(3) GM2 CS FTL.1.235(b)(3)</p>	<p>9. Rest Periods</p>		
<p>9.</p>	<p><b>Operator's procedures and practices for allocation of rest periods meet the applicable requirements, including Directive No 2000/79/EC or the act that transposes it into national legal order.</b></p> <p>→ Check if the operator's IFTSS specifies <u>minimum rest periods</u> at home base which must be at least as long as the preceding duty period or 12 hours whichever is greater and away from home base at least as long as the preceding duty period or 10 hours whichever is greater, to compensate for transient fatigue. ⇒ check during audit a sample of worked rosters if these minimum rest period are complied with.</p> <p>→ Check if the operator's IFTSS specifies that rest periods are free from all duties, standby and reserve. ORO.FTL.105(21).</p> <p>→ Ask the operator to demonstrate that the location(s) of the selected suitable accommodation for rest periods away from home base allows for an 8 hour sleep opportunity, travelling and physiological needs, as a minimum. ⇒ check if the IFTSS provides for an increase of the rest period away from home base, if the travelling time to the suitable accommodation is more than 30 minutes. (Note: in usual circumstances, the time for physiological needs should be 1 hour and for travelling to the suitable accommodation should be 30</p>	<p><input type="checkbox"/> yes, fully</p> <p><input type="checkbox"/> yes, partially</p> <p><input type="checkbox"/> no</p> <p><input type="checkbox"/> n/a</p>	

	<p>minutes.)</p> <ul style="list-style-type: none"> <li>→ If the operator intends to apply <u>reduced rest periods</u> at home base and/or away from home base, it must first submit evidences for compliance of its FRM with ORO.FTL.120, before being approved to apply reduced rest periods. (Note #1: <i>In addition, the operator must provide data (presumptions) from at least two sources (fatigue, sleep, workload or performace) and must establish fatigue thresholds and develop SPI's to monitor them.</i> Note #2: <i>the checklist for assessing operator's compliance with ORO.FTL.120 is contained in Part 3 of this document.</i>)</li> <li>→ Check if the operator's IFTSS specifies the <u>recurrent extended recovery rest periods</u> (ERRPs) to compensate for cumulative fatigue within 168 hours or less. ⇒ the time between the end of one ERRP and the start of the next ERRP must be 168 hours or less. ⇒ check during audit a sample of worked rosters if these minimum ERRPs are complied with.</li> <li>→ Check if the operator's IFTSS specifies that whenever a single day free of duty is assigned to the crew member, it is notified in advance and contain two local nights.</li> <li>→ Check if the operator's IFTSS provides for additional rest periods to mitigate the fatigue from disruptive schedules. ⇒ check if the operator's IFTSS provides for a local night during the rest period at home base, between a late finish/night duty and an early start; ⇒ check if the operator's IFTSS provides a 60 hours ERRP following 4 or more night duties, early starts or late finishes within 168 hours or less. ⇒ check during audit a sample of worked rosters if these rest requirements are complied with.</li> <li>→ Check if the operator's IFTSS provides for <u>additional rest periods</u> to compensate for the effects of time zone differences and extensions of the FDP. ⇒check if the operator's IFTSS includes a process for monitoring the impact of rotations and combinations of rotations on crew member's fatigue level and for adapting the rosters, if necessary. ⇒check if the table of CS FTL.1.235(b)(3)(i) is included in the operator's IFTSS; ⇒check if the operator compensates the transition at home base between alternating rotations by minimum of 3 local nights of rest. ⇒check during audit a sample of worked rosters if these additional rest periods are complied with.</li> </ul>		
<p>ORO.FTL.240 AMC1 ORO.FTL.240</p>	<p>10. Nutrition</p>		
<p>10.</p>	<p><b>Operator's procedures and practices for nutrition meet the applicable requirements.</b></p> <ul style="list-style-type: none"> <li>→ Check if the operator's IFTSS provides for the crew member's nutrition during the FDP by at least specifying minimum duration of the meal opportunity, normal meal times during which a meal opportunity is provided and the number of hours of work after which a regular meal should be consumed.</li> <li>→ Check if operator's nutrition procedures and practices are customised to the operator's specific operating conditions such as routes and airports served, rest periods and FDP length.</li> <li>→ Check how the operator's nutrition procedures and practices intend to avoid any detriment to a crew member's performance, especially when the FDP exceeds 6 hours</li> </ul>	<p><input type="checkbox"/> yes, fully <input type="checkbox"/> yes, partially <input type="checkbox"/> no</p>	

ORO.FTL.245	<b>11. Records of home base, flight times, duty and rest periods</b>		
11.	<p><b>Operator's procedures and practices for keeping records of flight times, duty and rest periods, and assigned home bases, for each crew member, meet the applicable requirements.</b></p> <ul style="list-style-type: none"> <li>→ Check if the operator's IFTSS provides for keeping individual records of each crew member's flight times, duty and rest periods, and assigned home bases.</li> <li>→ Check if the operator's IFTSS provides for keeping records of planned and achieved rosters.</li> <li>→ Check if the operator's IFTSS provides for keeping reports of commander's disrtetion.</li> <li>→ Check these records are maintained for a period of 24 months.</li> <li>→ Check if the operator keeps reports on extended FDPs and reduced rest periods.</li> <li>→ Check that the operator provides copies of individual records of FT, DP and rest perios to crew member concerned and to another operator (ORO.FTL.245 (b)(1)(2))</li> </ul>	<input type="checkbox"/> yes, fully <input type="checkbox"/> yes, partially <input type="checkbox"/> no	
ORO.FTL.250 AMC1 ORO.FTL.250	<b>12. Fatigue Management Training</b>		
12.	<p><b>Operator's fatigue management training programme meets the applicable requirements.</b></p> <ul style="list-style-type: none"> <li>→ Check if the operator's OM provides for a training programme on fatigue management education and awareness.               <ul style="list-style-type: none"> <li>⇒ check if the training programme contains as a minimum the training syllabus specified in AMC1 ORO.FTL.250;</li> <li>⇒ check if the training programme is adapted to the type of operations and operator's specific fatigue risks.</li> </ul> </li> <li>→ Check if the training programme provides for initial and recurrent fatigue management training to crew members, personnel responsible for preparation and maintenance of crew rosters and management personnel.               <ul style="list-style-type: none"> <li>⇒ check if the initial and recurrent training syllabus is adapted for the required groups.</li> </ul>               (Note: <i>the fatigue management training is a competency-based training; the operator should identify what training and competences are needed for each personnel group.</i>)             </li> <li>→ Check if the training programme provides for training on operator's processes for reporting fatigue. (AMC1 ORO.GEN.200(a)(4))</li> <li>→ Check if the operator has identified how often recurrent training will take place.</li> <li>→ Check if the operator's OM requires that training records are kept up to date (AMC1 ORO.GEN.200(a)(4) &amp;(6))</li> <li>→ Check how the operator intend to continuously measure the effectiveness of the training.</li> </ul>	<input type="checkbox"/> yes, fully <input type="checkbox"/> yes, partially <input type="checkbox"/> no	

**4.3. Part 3 - Assessing compliance with Fatigue risk management (FRM) (ORO.FTL.120) [to be developed]**

