



# EASA

European Aviation Safety Agency

## Operator responsibilities – performance based oversight of FTL

2nd Workshop on the Approval and Oversight of  
Fatigue Risk Management (FRM)

Cologne, 04 November 2015

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## ORO.FTL.125

### Flight Time Specification Schemes

Operators shall **establish, implement** and **maintain** flight time specification schemes that are **appropriate** for the type(s) of operation performed and that comply with Regulation (EC) No. 216/2008, this Subpart and other applicable legislation, including Directive 2000/79/EC.

Before being implemented, flight time specification schemes, including any related **FRM where required**, shall be **approved** by the competent authority.



# Flight time specification scheme



Subpart  
FTL

AMC to  
Subpart  
FTL

CS-FTL

Other  
applicable  
legislation

OM Part A  
Chapter 7  
+ policies



# Fatigue management & SMS

Operator responsibilities



## SMS

- ORO.GEN.200 Management system
- AMC/GM

## Fatigue management

- FTL
- FRM
- FTL combined with FRM





# Fatigue management & SMS

## ORO.GEN.200

EASA standardisation inspections shall verify that Competent Authorities assess the following.

- The operator has established a fatigue reporting system.
- Fatigue is identified as a hazard on the operator's hazard log.
- The operator's risk register identifies operational aspects where fatigue could increase the risk.
- The operator has demonstrated how fatigue risks are assessed, mitigated and monitored.
- The assessment of fatigue risks is undertaken in timely manner.



# Operator responsibilities

## ORO.FTL.110 Operator Responsibilities

10 specific areas requiring the operator to demonstrate the **performance** of the rostering system and crew members' rosters with regard to **fatigue management**

The use of FRM is encouraged.

FRM might also be a useful tool to demonstrate compliance with the responsibilities established in ORO.FTL.110, ... (EN to Opinion 04/2012)



# ORO.FTL.110(b) Operator responsibilities

The Operator ensures 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.

NAA:

**“How is this achieved?”**

## AMC1 ORO.FTL.110

- Has the Operator developed own Fatigue Management rostering rules?
- Has the Operator a procedure for managing potentially elevated fatigue levels due to overtime or working on rostered days off?
- Can the Operator demonstrate that FDP planning takes into account sufficient time for pre-flight duties, taxiing, flight time and turnaround?



# ORO.FTL.110(b) Operator responsibilities

## How is this achieved?

- Rostering rules are applied and, if applicable, integrated in planning tool/system
- Rostering rules are appropriately documented (OM A ch. 7 is the basis)
- Performance indicators are established to monitor roster stability
- There is a policy for the management of working overtime / days off





# ORO.FTL.110(c) Operator responsibilities

Specify reporting times that allow sufficient time for ground duties

NAA:

**“How is this achieved?”**

Has the operator demonstrated that the specified reporting times allow sufficient time for ground duties?

GM1 ORO.FTL.205(a)(1)

- Do the reporting times take account of:
- Type of operation
- Size and type of aircraft
- The reporting airport conditions?



# ORO.FTL.110(c) Operator responsibilities

## How is this achieved?

- Ground duties are clearly defined
- Time spent on ground duties is calculated applying a data-driven method
- Reporting times are tailored for actual operations, considering airports specificities



# ORO.FTL.110(d) Operator responsibilities

Take into account the relationship between the frequency and pattern of FDP's and rest periods and give consideration to the cumulative effects of undertaking long duty hours combined with minimum rest periods

**NAA:**

**“How is this achieved?”**

Does the operator consider the cumulative effects of undertaking long duty hours combined with minimum rest periods?

Are the operators considering the relationship between the frequency and pattern of flight duty periods and rest periods when rosters are constructed?

Can the operator demonstrate that the work is distributed evenly?



# ORO.FTL.110(d) Operator responsibilities

## How is this achieved?

- Rostering rules are established applying fatigue management principles, especially on long FDP / minimum rest
- Performance indicators are established to monitor long FDP / minimum rest combinations (border line)



# ORO.FTL.110 Operator Responsibilities

## Demonstration of compliance

Successful use of Management System  
(ORO.GEN.200) to demonstrate fatigue management  
within the boundaries of prescriptive limits of  
ORO.FTL & CS-FTL.1



Pre-condition before approaching the competent  
authority for FRM approval



# EASA

European Aviation Safety Agency

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**Summary**    The Operator needs to demonstrate how it fulfils its responsibilities

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The FTL scheme must be realistic and appropriate to the operation conducted

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Management system hazard identification and risk assessment processes are applied

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**The Competent Authority must be convinced the fatigue risks are effectively managed**

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