



Regulations and Transition Process

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27 January 2015

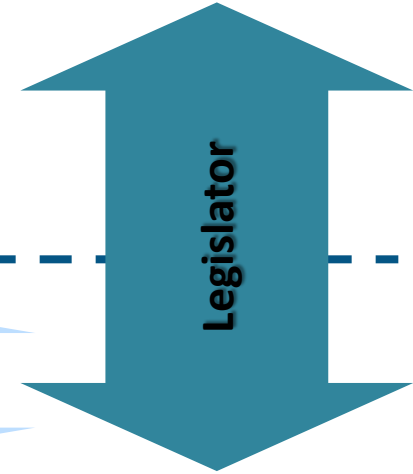
Regulations and Transition Process



- **Reminder of the Significant Areas**
- **ORO.FTL.120 Fatigue Risk Management**
- **CAA requirements for transition**
- **Summary**

European regulatory framework

Basic Regulation
Essential Requirements



IR



EC

AMC

CS



EASA

GM

Current Stage in Developing EU FTL regulations

- EU FTL regulations will eventually cover all areas where crew member fatigue is required to be managed
- The regulations were published on 29 January 2014 in the European Official Journal as Commission Regulation (EU) No 83/2014 amending Regulation (EU) No 965/2012.
- The EASA Decision Material – Certification Specifications, Acceptable Means of Compliance and Guidance material has been published on the EASA website.
- **The regulations will become applicable on 18 February 2016**

FTL Approval

- The CAA remains the competent authority for issuing FTL and FRM approvals and for ongoing oversight
- All current variations will be revoked when the operator is issued with an approval in accordance with Subpart-FTL
- Any request for a derogation or an individual FTL scheme will need to be first approved by the CAA in accordance with the flexibility provisions of the Basic Regulation

Key Elements for Consideration

- Operators must train their crew in fatigue management under ORO.FTL.250
- Operators must also comply with their Management System requirements and produce a Change Management (or safety case) for the transition
- **Operator Responsibilities ORO.FTL.110**
 - 10 Specific areas that require the operator to demonstrate the fatigue management performance of crew members rosters
- There are also a number of specific procedures and processes that are required to be part of the OM and will require approval with the prescriptive FTL requirements

Meeting the Requirements of ORO.FTL.110



Demonstrate understanding of your fatigue risks (Safety Case / SMS Hazard log / Risk Register, etc)



Demonstrate what you do to manage combinations or patterns of work that could impact on the crew's ability to rest (roster rules / planning rules / etc)



Show an understanding of the differences between bases, fleets and flight / cabin crew



Develop a method of tracking performance

Managing Night Duties

- **Additional requirements for the management of night duties where they exceed 10 hours Flight Duty Period**
- CS FTL.1.205 Flight Duty Period (a) (2) states “appropriate fatigue risk management in relation to the surrounding duties and rest periods”
- GM1 CS FTL.1.205(a)(2) provides further detailed guidance of what is required over and above ORO.FTL.110 responsibilities
- Full compliance with ORO.FTL.120 requirements is NOT required
- Demonstration of these additional requirements do NOT provide the operator with FRM privileges

FRM under Subpart FTL



Fatigue Risk Management

ORO.FTL.120

- FRM fully complies with ICAO SARPS
- FRM integrated within the operators SMS
- FRM is required for:-
 - ORO.FTL.205(3) Crew members in an unknown state of acclimatisation under FRM
 - CS FTL.1.235 Rest Periods (c) Reduced Rest
 - Derogations

FRM Implementation

- There is no 'off-the-shelf' version of an FRM that will suit all operators
- Operators need to first focus on demonstrating that they meet the Operators Responsibilities
- FRM requires a separate approval process which will include the need for a safety case
- FRM process must be fully demonstrated for operators to use the standard variations
- FRM approvals will NOT be issued with the initial approval unless the operator already has an approved FRM

CAA Supporting Guidance Material



EASA SUBPART FTL - QUESTIONS & ANSWERS

Number	Question	Answer
1	When does the new EASA Regulation for flight and duty time limitations and rest come into force and when is it applicable?	Commission Regulation (EU) 83/2014 came into force on 18 February 2014. It is applicable on 18 February 2016.
2	Which types of operator does the EASA Regulation on Flight Time Limitations (FTL) apply to?	Open ended • • • Helicopter
3	Why have Air Taxi, EMS and Single Pilot CAT operations been excluded from EASA FTL regulations?	The Commission Regulation (EU) 83/2014
4	What does 'Air Taxi' mean in the context of the EASA FTL regulation?	A non-scheduled operation
5	If an operation is solely Air Taxi, EMS or Single Pilot, what flight and duty time limitations and rest requirements will be applicable?	Under applicable national rules
6	As a two-crew Air Taxi operator, is it possible to use the new EASA FTL regulation?	The Commission Regulation (EU) 83/2014 does not cover two-crew operations. The Commission Regulation (EU) 83/2014 does not cover two-crew operations. The Commission Regulation (EU) 83/2014 does not cover two-crew operations.
7	Does the new EASA FTL regulation apply to Cargo operations?	Yes

Audit checklist for EASA Subpart FTL

Audit guidance for the Transition to EASA Subpart FTL

(Elements under performance based requirements managed under the operators SMS. This does not cover FRM applications.)

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Version 1 - January 2015

operators developing their own methods to manage the related risks. It is intended to be used in the operational context. Compliance only with the requirements required under this implementing rule requirements. Operators must meet the requirements in the IR's. Operators must identify and identified risks to demonstrate

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This document is provided

The EU and EASA documents (linked to the official documents)

28 November 2014 Version 02

November 2014

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Guidance Material Version 1

Application process

- Operator submits NPA with scheme, compliance checklist, safety / change management case, supporting processes and procedures, high level training plan
- CAA conducts a desktop review of scheme and associated documents
- CAA provides feedback to the operator and either asks for amendments or arranges an audit at the operator
- CAA Inspectorate conducts audit, checks initial training has been conducted and advises finding results to the Flight Standards Officer
- FSO arranges for approval, manual updates and agrees start date for the new scheme
- New Ops Approval issued

Summary

- Focus needs to be on the development of the new scheme and methods to demonstrate compliance with the Operator Responsibilities
- FRM will not be generally available with initial issue
- CAA guidance material has been developed
- Scheme approval is both a document review and audit

Thank you for your attention