Irish Aviation Authority The Times Building 11–12 D'Olier Street Dublin 2, Ireland www.iaa.ie **Safety Regulation Division**	**Údarás Eitlíochta na hÉireann** Foirgneamh na hAmanna 11–12 Sráid D'Olier Baile Átha Cliath 2, Éire **Rannán na Rialachán Sábháilteachta**	No. OAM 06 Revision 00 Date 11.08.17	IAA

Title: EASA Subpart FTL – Fatigue/Disruptive Schedule determination

1.   INTRODUCTION

The purpose of this document is to highlight some of the elements that should be considered in order to meet the EASA Subpart FTL requirements during the transition process. It is important to note that these requirements apply to all Operators who are required to implement Regulation (EU) 83/2014.

This document also indicates the Authority's decision on Disruptive Schedules in accordance with Regulation 965/2012 ARO.OPS.230

2.   REFERENCES

Regulation 965/2012 – ARO.OPS.230, ORO.FTL and ORO.GEN.200

3.   DETAIL

As part of the EASA Air Operations Regulations (ORO.GEN.200) Operators are required to have a Management System. As part of this Management System Operators are required to identify all risks in the operation including the risk of Fatigue.

In order to demonstrate full compliance with Part FTL Regulations and specifically the requirements for Fatigue Management (ORO.FTL.110), Operators must submit their proposed FTL scheme and demonstrate compliance with these requirements prior to the 18th February 2016.

Below is some guidance for the management of Fatigue which Operators might find useful in drawing up its Policies and Procedures for reducing the risk of Fatigue.

4.   ELEMENTS TO DEMONSTRATE COMPLIANCE WITH THE REGULATIONS

Operators are required to address the following elements in order to demonstrate compliance with the Regulations -:

1. Accountable manager's Commitment to Fatigue Management.
2. Fatigue Management Policies and Procedures.
3. Fatigue Reporting process.
4. Fatigue Management Training Programme.
5. System for Monitoring Crew Member Fatigue.
6. Fatigue Management Evaluation Programme.

4.1   Accountable Manager's Commitment to Fatigue Management.

The Accountable Manager needs to commit to the Risk Management Programme and promote a "Just Culture" within the organisation.

4.2   Fatigue Management Policies and Procedures

Detail and publish the Policies and Procedures in a manual which is readily available to crew and required operations personnel.

4.3   Fatigue Incident Reporting Process

A reporting process needs to be put in place where fatigue reporting is encouraged. Such a process needs to ensure that crew fatigue reports are used to inform the Operator on its fatigue risk mitigations. It is important that the process allows crew to feel protected against adverse actions that might discourage reports of fatigue.

4.4 Fatigue Management Training Programme

Fatigue Management Training needs to be completed by crew members, personnel responsible for the preparation and maintenance of crew rosters and management personnel who have an impact on crew member scheduling. Details of the required training are outlined in the Regulations (ORO.FTL.250).

Please note that this training must be completed prior to the implementation of the new Regulations.

4.5 System for Monitoring Crew Member Fatigue

A process should be developed to monitor the operational robustness of the rosters. This process should capture the following information as a minimum -:

- Identify the fatigue related risks with the operator's type of operation
- actions by the crew members to obtain rest
- subjective and objective evidence of fatigue
- disruption to rosters
- use of discretion
- the schedule that lead up to the fatigue report

4.6 Fatigue Management Evaluation Programme

Develop and implement a systematic process for evaluating the effectiveness of the fatigue management process.

In conclusion, the Authority intends to complete an audit of the above requirements to ensure that they have been adequately addressed as part of the approval process in advance of approving individual FTL schemes.

5. DISRUPTIVE SCHEDULE - EARLY/LATE DECISION

To meet the compliance requirements of ARO.OPS.230 (Determination of disruptive schedules) the Authority has decided that all Commercial Air Transport operators issued with an Irish AOC will be required to comply with the "early type" definition.