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ETF STATEMENT

EASA should act now to mitigate aircrew fatigue

The ETF representing more than 100.000 aircrews welcome the recent study on the effectiveness of Flight Time Limitations (FTL) especially on fatigue during night duty and disruptive schedules. The study took a scientific and technical approach and the findings at the European Aviation Safety Agency (EASA) are the start of a new process and development on FTL. Indeed, Aircrew fatigue continues to be a great concern to the ETF as demonstrated by the scientists involved in the EASA study. Action should be taken in a step-by-step approach to implement the 6 recommendations from the study.

The conclusions of the study provided evidence that night Flight Duty Periods (FDP's), both longer and shorter than 10 hours, were associated with a high probability of high fatigue. Late finish and night FDP's are more fatiguing than early start FDP's. In addition, the analysis found shorter sleep prior to an FDP to be a predictor of high fatigue during night FDPs.

These conclusions are fully in line with what our members have been telling us all along. Flying 10 hours or more at night is fatiguing. A series of broken sleep patterns with late finishes and ultra-early starts is also a fatigue risk that we need to address.

The scientists recommend that all airlines be required to apply appropriate fatigue risk management strategies to mitigate the fatiguing effect of late finish FDPs, regardless of FDP duration. They also recommend that all airlines should be required to promote optimum use of sleep opportunities (i.e., before reporting and during the FDP).

The ETF agrees with the analysis and the recommendations of the scientists. Many airlines haven't yet implemented all the provisions of the FTL Regulation, notably on Fatigue Risk Management and Fatigue Risk Management Systems (FRMS).

It is the role of the National Aviation Authorities (NAAs) to oversee that the FTL regulation is correctly and fully implemented. It is the ETF view that the lack of competent oversight and training at member state level in the majority of member states is worryingly high. Therefore, as a first step, it is an absolute necessity that EASA face the challenge of training, compliance and oversight with FTL at national level as a top priority.

Whilst we work together to make our skies safer by ensuring compliance with the current legislation and implement the recommendations from the study, we also look forward to the future scientific studies in phase 2 assessing fatigue levels. The next step will be for the EASA to establish a strong and effective holistic strategy to address in a solid way all the aircrew fatigue issues. ETF is fully committed to work with EASA, the NAAs and all stakeholders to find solutions to this key safety hazard of fatigue which could have an impact on safety, and the health of our aircrew.

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