

EASA Flight Time Limitations (FTL) Guidance material for ORO.FTL.110

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Guidance material for ORO.FTL.110

Operator responsibilities

This document contains guidance on ORO.FTL.110 requirements, to help operators develop their own methods and processes to actively manage and show oversight of their identified fatigue risks.

It should be used in a proportionate way depending on the size and complexity of the operator and their operational context.

Compliance only with the prescriptive and numerical limits within an operator's scheme does not meet the operators responsibilities required under ORO.FTL.110. This document will give examples of elements that could be used to demonstrate compliance with the implementing rule requirements. Operators may wish to develop alternative methods that may be more suitable to their operation and risks.

Operators must develop a change management plan (required under their Safety Management System) to assess the risks associated with the change to the new regulations from current practices, as well as show how they will manage specific fatigue risks.

Along with the requirements of the regulations, operators will need to consider other industrial, social or contractual aspects of their operation; including tracking any changes to these areas if they are used as mitigations or controls for fatigue related risks.

While there are a number of suggested metrics listed at the end of this document, they only relate to core fatigue areas and are not numerical values. The methods and safety performance indicators that the operator chooses to use will enable them to demonstrate how they manage fatigue risks internally. The measures may include developing additional planning and day of operation requirements, all measures should be reviewed and adjusted as necessary.

Operators may want to make use of the tools and techniques outlined in the [ICAO Fatigue Risk Management System manual](#), which is a good source of information for developing assessment and assurance processes. [IATA has also produced guidance for developing fatigue safety performance indicators](#), including developing roster metrics, which provides a useful source of practical information for operators to demonstrate they are meeting the requirements of ORO.FTL.110.

Specifics for ORO.FTL.110(a)

Principles

- Crew need to know rostered duties, rest and recovery periods in advance in order to plan the use of their rest periods (AMC1 ORO.FTL.110(a))
- Changes to rostered duties can cause difficulties for crew to efficiently plan and use their rest periods, especially where the change is given with little notice of the new duty

Considerations

- Develop roster publication dates that are made available to crew members on an annual basis
- Develop a method to manage changes to the assigned duties so that the extent of the disruption reduces closer to the day of operation.
- Develop roster disruption metrics that could include:
 - a) Effect of changes to:
 - Sleeping patterns
 - Sleep quality
 - Sleep duration
 - b) Higher impact on fatigue through:
 - Short notification
 - Time of day of notification
 - c) Notification method:
 - Active communication (e.g. direct phone call)
 - Passive communication(e.g. text message or email)