

Audit guidance for the Transition to EASA Subpart FTL

Version 1

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

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1. ORO.FTL.110 Operator Responsibilities / ORO.GEN.200 Management System			
Ref:	Marker	How is it achieved?	Remarks
1.1	Crew member fatigue is indicated as a potential hazard on the organisations hazard log and the risk register identifies specific operational aspects where fatigue could generate an increased risk. (ORO.GEN.200)		
1.2	The Operator's Fatigue management processes are managed as part of the operators SMS processes. (ORO.GEN.200)		BP
1.3	There is a method by which crew can report fatigue (ASR / specific Fatigue reporting form) (ORO.GEN.200(a)(3)).		
1.4	The Operator has demonstrated, within their operation / operations, how fatigue risks are: - identified and assessed - monitored - controlled (ORO.GEN.200 / ORO.FTL.110 (b)(d)(e)(g))		
1.5	The consideration of fatigue risk is undertaken at the earliest opportunity in the flight planning / network scheduling process. As a minimum this would be on a seasonal (summer/winter) basis. (AMC1 ORO.FTL110)		BP

2. ORO.FTL.110 (a) Operator Responsibilities "Duty rosters are published sufficiently in advance to provide the opportunity for crew members to obtain adequate rest"			
Ref:	Marker	How is it achieved?	Remarks
2.1	Rosters are published at least 14 days in advance. (AMC1 ORO.FTL.110(a))		

3. 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.”

Ref:	Marker	How is it achieved?	Remarks
3.1	The Operator has developed their own Fatigue Management rostering rules to manage the risks associated with their type of operation(s), specifically in relation to the requirements of (b) (AMC1 ORO.FTL.110)		
3.2	The Operator has a procedure for managing the possibility that crew working overtime or on rostered days off, might encounter elevated levels of fatigue during the duty. (ORO.FTL.110 (b)(d))		
3.3	The Operator can demonstrate that the FDP's are developed to take into account sufficient time for pre-flight duties, taxiing, flight time and turnaround times. (AMC1 ORO.FTL110 (b))		

4. ORO.FTL.110 (c) Operator Responsibilities

“Specify reporting times that allow sufficient time for ground duties

Ref:	Marker	How is it achieved?	Remarks
4.1	Specified reporting times demonstrate that they allow sufficient time for <u>ground duties</u> .		
4.2	The reporting times specified by the Operator take account of the type of operation, the size and type of the aircraft and the reporting airport conditions. (GM1 ORO.FTL.205(a)(1))		

5. 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”

Ref:	Marker	How is it achieved?	Remarks
5.1	The Operator considers the cumulative effects of undertaking long duty hours combined with minimum rest periods		
5.2	Procedures are in place to consider the relationship between the frequency and pattern of flight duty periods and rest periods when rosters are constructed. (AMC1 ORO.FTL.110)		
5.3	The operator can demonstrate that they distribute the work evenly. (AMC1 ORO.FTL.110 (a))		
5.4	The Operator has developed their own fatigue management rostering rules to manage the risks associated with their type of operation(s), (specifically in relation to the requirements of (d). (AMC1 ORO.FTL.110)		

6. ORO.FTL.110 (e) Operator Responsibilities**“Allocate duty patterns which avoid practices that cause a serious disruption of an established sleep/work pattern, such as alternating day/night duties”**

Ref:	Marker	How is it achieved?	Remarks
6.1	The Operator has processes in place to monitor and manage the fatigue associated with transitions from ‘earlies’ to ‘lates’, and vice versa		
6.2	The Operator has a process to assess and, where possible avoid or minimise the impact of work patterns which contain undesirable practices (alternating day/night, alternating eastward/westward – westward/eastward transitions, long positioning duties). (AMC1 ORO.FTL.110 (b)(1)). <i>(Note: This AMC reference also applies to the requirements under (d) and (g).)</i>		

7. ORO.FTL.110 (f) Operator Responsibilities**“Comply with the provisions concerning disruptive schedules in accordance with ARO.OPS.230”**

Ref:	Marker	How is it achieved?	Remarks
7.1	Rostering system rules can demonstrate that they comply with the Disruptive Schedules requirements. (CS FTL.1.235(a))		