

**EASA CAPACITY BUILDING**

**ETF COMMITTEE  
SAFETY ISSUES**



With the support of the  
European Commission

*The text in this document is provisional due to the transition phase between Regulation (EC) No 216/2008 – Basic Regulation pre September 2018 and Regulation (EC) No 2018/1139 – New Basic Regulation post September 2018. The information contained within this document has been sourced from current information available and is being regularly updated during this transition phase.*



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### **Going forward: Key EASA Safety Issues by ETF committee**

ETF has identified during this project key safety issues to focus on going forward. With the training, knowledge and expertise from this project this will allow our affiliates in ETF to achieve the goals and objectives of our ETF strategy as a stakeholder within EASA.

ETF has identified a number of safety issues within the EPAS 2019-2023 that concern our members, these safety topics are highlighted within the attached EPAS 2019-2023 spreadsheet (Annex 7). They are colour coded by ETF Civil Aviation Sections (CAS) - Air Traffic Management Committee (ATMC), Ground Staff Committee (GSC) and Joint Aircrew Committee (JAC). This will be updated as the new EPAS is published each year.

For the final conference in Dublin on the 19/20 November 2019 each ETF committee focused on a key safety issue:

1. ATMC – ATM Staff Competences
2. GSC – RMT.0728 Development of requirements for ground handling
3. JAC – Flight Time Limitations (FTL) oversight, compliance and training for all stakeholders, NAA, Operators and Crew

Examples of work done to date and to be carried out going forward by each committee are contained in this document.

## 1. ATM STAFF COMPETENCES

### Description of the issue

*What is the problem? And why is it a problem? Provide a problem statement for the issue.*

*For safety issues only, if there are several scenarios that are relevant, please list them.*

The absence of detailed training and competence requirements and guidance for ATM staff other than ATCOs and ATSEPs creates an uneven playing field for Air Navigation Service Providers and those staff with safety related duties. It is entirely possible that due to the lack of a harmonised approach, these staff might be under-competent/undertrained and cause safety issues.

One could imagine a failure in the provision of training to different professions. This could be the cause of a safety failure. It is important that all actors of the aviation safety chain are aware of the chain they are part of so that lack of cross training and appreciation of other roles is a safety hazard. Situational awareness might get impaired when staff do not understand the roles and tasks of other actors of the safety chain.

EASA had in the past included in its rulemaking program, tasks mirroring all rulemaking tasks on technical requirements in the domain of air traffic management to cover all competence related issues. Then the Agency contracted a consultant to deliver a study about this matter and then the ATM social partners committed to advise EASA on the way forward. This candidate safety issue is to put the matter back in EASA's scope. The EPAS has a gap as there is nothing currently addressing the ATM profession (outside of ATCO and some areas of ATSEP) tasks and the competence of staff performing those duties.

Lack of evidence that there is no safety gap in current set up of ANSPs:

There has never been an evaluation process to determine that all safety related tasks are sufficiently trained. And that competence can be assured. There is a need to make sure there is no gap. Training should be specified and harmonised for all roles/tasks that cover safety related aspects.

The wider context is a changing environment. Not just with new technology, but with commercial organisations as well. The industry and safety regulators need to understand the impact of this. Change management needs to be included and we have an opportunity to be proactive rather than reactive.

Recruitment? New competence and skills?

Requirements for recruitment could be out of date. Conversion training and the need to establish a level playing field on staff competence is required. This may lead to the creation of a labour market. Standardisation and harmonisation are required in order to achieve a commonality.

Request EASA to have a clear vision of existing ATM tasks and what the competence schemes for those tasks are.

### Affected stakeholders

*Describe who is affected by the described issue, what is affected (e.g. aircraft types, constitutes or*



*equipment, or type of operations and organisations), and, if applicable, specify in which flight phases and circumstances.*

Key stakeholders: ANSP, ATM staff, Training Organisations.

Secondary affected stakeholders: NSAs, airspace users and ultimately passengers. Military authorities.

### **Affected rules**

*Describe which rules are affected by the described issue.*

At least: ATCO IR 2015/340

And EU Reg. 2017/373

Potentially also: EASA BR

255/2010 ATFM (mentions competence)

677/2011 NF IR

Regulatory material stemming from RMT 720 on cybersecurity

### **Sources & Rationale**

*What triggered the identification of the issue? Are there data, studies or some other evidence available?*

ESARR5 set overall requirements.

ICAO requirements for ATCOs but also flight procedure designers and some other specific functions.

Unpopulated annex in EU Reg. 2017/373

Understanding of the whole picture – where are the gaps? Know what the safety concerns are.

IFAIMA study to assess where we are in terms of competence scheme for AIS/AIM.

The study ordered by EASA, even if it lacked a proper methodology, is using the Accident-Incident Model developed by Eurocontrol for SESAR and which has since been renamed the IRIS model. Using this safety model was a good idea but how to use it was further refined by the ATM social partners with the task safety impact assessment technique (TSIAT) which was presented to EASA in dedicated meetings. Limitations of this approach were identified for tasks linked to non-commercial aviation (which is at the moment the only focus on the IRIS model) and to the tasks happening after the incident (mostly linked to alerting service) for which EASA should ask Eurocontrol to help. How to build on various tasks to get to functions and ultimately to requirements is also an unsolved issue.

### **Preliminary proposal to solve the issue**

*- What would be your proposal to solve the issue?*

First step is to get a list of all ATM/ANS tasks from the various functions. EASA should be able to list the whole spectrum of the ATM task with the support of Eurocontrol and potentially SESAR.

Request the refinement of the IRIS model to cover all types of airspace users to cover all ATM/ANS tasks.

Identify the existing safety gaps using the TSIAT methodology extended to cover all safety related tasks.

Identify the need to create level playing field.

Identify the interdependencies between the safety related tasks.

Develop the appropriate regulation/AMC/guidance material to tackle the identified gaps involving the ATM social partners and other PSOs.

**Preliminary cost assessment to solve the issue**

*- What would be the potential estimated implementation costs to solve the issue?*

*- Please describe the type of costs which could occur? (technical solution, training, procedures, ...)*

**Cost varies depending on the current state of play, could even be a cost reduction (cost of not having a regulation).** Drafting the training scheme and realising it. Initial and continuous assessments. Loss of man hours during training phases.

Our proposal is a risk based approach, all associated costs are actually investments and cost of appropriate safety level.

We believe that most of the training required is already happening in an unharmonized manner and with a lack of evidence supporting the training decisions taken.

Potentially there can also be a need for investment on systems to reach the expected level of service.

**Preliminary benefit assessment to solve the issue**

*- What would be the potential estimated benefits if the issue is solved? (avoided unnecessary workload in hours or man-days, operational benefits [please describe them], ...)*

The main benefit of this proposal is to have a harmonised and measurable safety assurance.

It also offers the possibility of mobility of personnel around Europe, increased flexibility in staff management, standardisation of competences allowing improved cooperation, possible reduction of training costs due to standardisation and harmonisation of training schemes.

## 2. DEVELOPMENTS OR REQUIREMENTS FOR GROUND HANDLING

EASA Ground Handling Roadmap – phases 1-2018 , 2-2019, 3–2019/2020 published by EASA

### Phase 1 – Fact Finding

ETF involved in phase 1 providing data and meeting with EASA to discuss further relevant information for this RMT.

ETF stakeholder in the EASA GH task force created by EASA at the end of this phase.

### Phase 2 – Definition of Scope

- Description of the issue – summary of the outcome of phase 1
- Definition of objectives and performance indicators – what do we want to achieve? How do we assess if the course of action delivers?
- Design of GH roadmap – what are the right tools and actions to achieve the objectives with the highest possible efficiency?
- Presentation of GH roadmap – Conference with Member States (MS) and Stakeholders. *ETF a key speaker at this event.*
- Summary of conclusions from GH roadmap presentation – improve roadmap with MS and Stakeholder input.

ETF nominated expert involved with all these points in phase 2.

At the end of phase 2 six areas were identified by stakeholders and the expert group (including ETF) as concrete actions to work on going forward:

1. Management System, including SMS elements
2. Operational standards
3. Training
4. Ground Support equipment (GSE)
5. Oversight
6. Staff Turnover

The identified actions were put in to three different categories to better define future actions:

1. Rulemaking actions
2. Safety promotion actions
3. Actions based on existing industry standards or ICAO documents

Ground Handling Workshop of the EASA Capacity Building Project held in March 2019. This workshop was supported by EASA and focused on developing ETF's work with EASA on this RMT and our involvement as a stakeholder.

### Phase 3 – Implementation

- Implementation of roadmap actions, step 1 – rulemaking, safety promotion, actions for MS
- Implementation of roadmap actions, step 2 – communication and implementation support, support to the EC for IR adoption

EASA published Terms of Reference (ToR) for rulemaking task (RMT).0728 on the 30<sup>th</sup> September 2019.

ETF commented on the ToRS on the 14<sup>th</sup> October 2019.

On the 14/15 October EASA held a meeting of the GH task force, ETF attended this meeting.

***Annexes:***

Annex 1: EASA GH New Basic Regulation October 2019

Annex 2: ETF contribution to the EASA GH roadmap 270519

Annex 3: ETF contribution EASA GH ToRs 141019



# Ground Handling in Reg. (EU) 2018/1139

RMT.0728 — Meeting 1

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# Purpose

- To identify the regulatory provisions in the Basic Regulation
- Clarify EASA mandate
- Ensure that the proposed rules are in line with the Basic Regulation

# Scope

- Article 2
  - point (1)(d)
    - the design, production, maintenance and operation of safety-related aerodrome equipment used or intended for use at the aerodromes referred to in point (e) and the provision of ground handling services and AMS at those aerodromes
  - point (1)(e)
    - the design, maintenance and operation of aerodromes, including the safety-related equipment used at those aerodromes, located in the territory to which the Treaties apply, which:
      - (i) are open to public use;
      - (ii) serve commercial air transport; and
      - (iii) have a paved instrument runway of 800 metres or more, or exclusively serve helicopters using instrument approach or departure procedures

# Scope

- Article 2
  - point (3)(b)
    - The regulation does not apply to:
      - aerodromes or parts thereof, as well as equipment, personnel and organisations, that are controlled and operated by the military
  - point (7)
    - Member States may decide to exempt from this Regulation the design, maintenance and operation of an aerodrome, and the safety-related equipment used at that aerodrome, where that aerodrome handles no more than 10 000 commercial air transport passengers per year and no more than 850 movements related to cargo operations per year, and provided that Member States concerned ensure that such exemption does not endanger compliance with the essential requirements referred to in Article 33
    - From the date specified in that exemption decision, the design, maintenance and operation of the aerodrome concerned and the safety-related equipment and groundhandling services and AMS shall no longer regulated by this Regulation and by the delegated and implementing acts on the basis thereof.



# Aerodromes in the EASA Scope

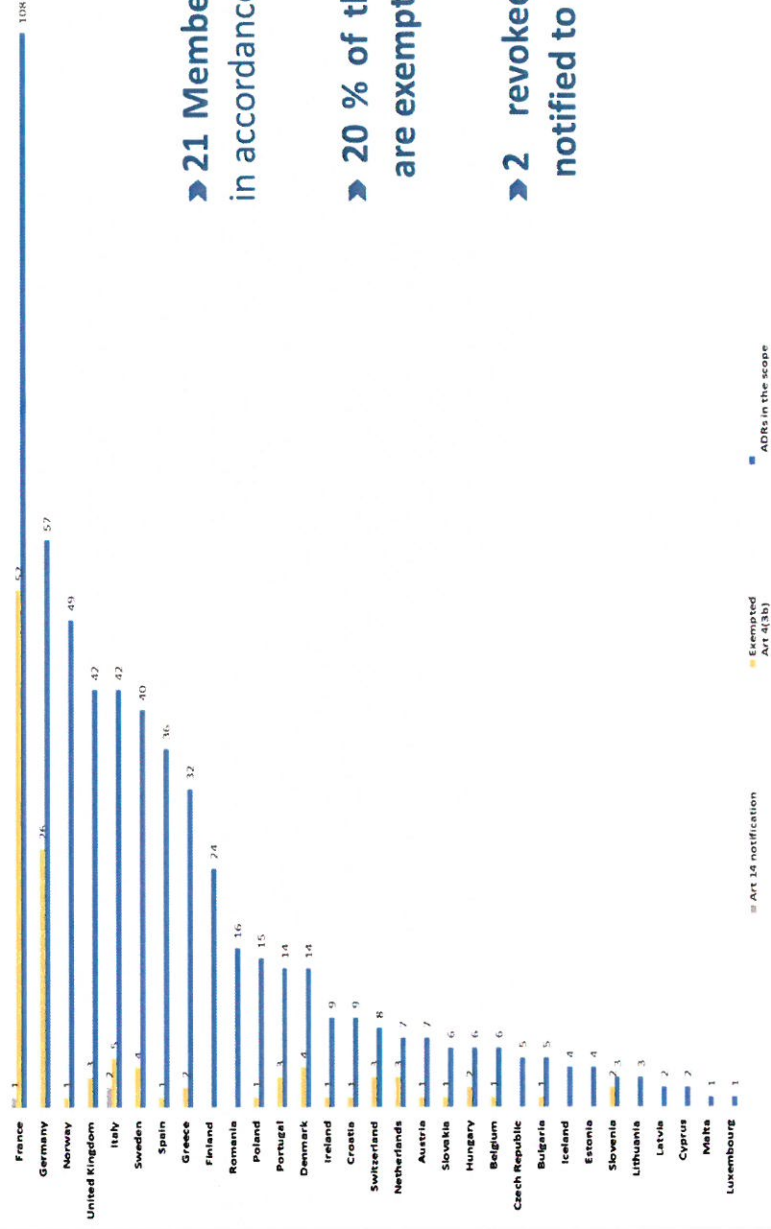
Σ aerodromes in the scope of BR= 577\*



- 456 certified
- 118 exempted
- 3 Art 14(4) notifications
- [List of aerodromes](#)



# Article 5 of R 139/2014 - Exemptions



➤ 21 Member States granted exemptions in accordance with Art 4(3b) of the BR;

➤ 20 % of the aerodromes in the scope are exempted

➤ 2 revoked exemptions have been notified to EASA so far

# Definitions

## → Article 3

### → point (10)

#### → 'declaration' means any written statement made in accordance with this

Regulation under the sole responsibility of a legal or natural person subject to this

Regulation and which confirms that the applicable requirements of this

Regulation and of the delegated and implementing acts adopted on the basis

thereof relating to a legal or natural person, product, part, non-installed

equipment, equipment to control unmanned aircraft remotely, safety-related

aerodrome equipment, ATM/ANS system, ATM/ANS constituent or flight

simulation training device are complied with;

# Definitions

- Article 3
  - point (23)
    - ‘groundhandling service’ means any service provided at aerodromes comprising safety-related activities in the areas of ground supervision, flight dispatch and load control, passenger handling, baggage handling, freight and mail handling, apron handling of aircraft, aircraft services, fuel and oil handling and loading of catering; including the case where aircraft operators provide those groundhandling services to themselves (self-handling)
    - ‘commercial air transport’ means an aircraft operation to transport passengers, cargo or mail for remuneration or other valuable consideration



# Aerodromes

- Section IV
  - Article 33 – Essential requirements
    - Aerodromes, safety-related aerodrome equipment, the operation of aerodromes and the provision of groundhandling services and AMS at aerodromes referred to in point (e) of Article 2(1) shall comply with the essential requirements set out in Annex VII and, if applicable, Annex VIII.
  - Article 37 – Organisations
    - point 2
      - Organisations responsible for the provision of groundhandling services and AMS at aerodromes subject to this Regulation shall declare their capability, and the availability to them of the means, to discharge the responsibilities associated with the services provided in compliance with the essential requirements referred to in Article 33.

# Aerodromes

- Article 39 – Delegated powers
  - point (1)
    - For the operation of aerodromes and the provision of groundhandling services and AMS at aerodromes, the Commission is empowered to adopt delegated acts in accordance with Article 128 laying down detailed rules with regard to:
      - point (d)
        - the conditions and procedures for the declaration by organisations providing groundhandling services and by organisations providing AMS in accordance with Article 37(2), including recognition, without further verification, by the operators, of those declarations
    - point (e)
      - the privileges and responsibilities of the organisations providing groundhandling services and by organisations providing AMS which have made declarations in accordance with Article 37(2).

# Certification, oversight and enforcement

- Article 62
  - point (4)
    - The national competent authority of the Member State where the aerodrome is located shall be responsible for those tasks with respect to the aerodrome certificate referred to in Article 34(1) and the certificate for an aerodrome operator referred to in Article 37(1)
    - The national competent authority shall also be responsible for the oversight and enforcement tasks with respect to organisations responsible for the provision of groundhandling services or AMS at that aerodrome.

# Certification, oversight and enforcement

- Article 67 – Validity and recognition of certificates and declarations
  - point (1)
    - Certificates issued by the Agency or the national competent authorities, and declarations made by natural and legal persons in accordance with this Regulation and with the delegated and implementing acts adopted on the basis thereof shall be subject exclusively to the rules, conditions and procedures laid down in this Regulation and national administrative requirements and shall be valid and recognised in all Member States, without further requirements or evaluation.



# Essential Requirements

- Annex VII of Reg. 2018/1139
  - Responsibilities of the GHSP
    - The GHSP is responsible for the safe operation of its activities at the aerodrome
    - The responsibilities of the provider are as follows:
      - Shall have all the means necessary to ensure safe provision of service at the aerodrome. Those means shall include, but are not limited to, facilities, personnel, equipment and material
      - Shall comply with the procedures contained in the aerodrome manual, including those in relation to movements of its vehicles, equipment and personnel and the risk related to aerodrome operations in winter, at night and in adverse weather conditions
      - Shall provide the groundhandling services in accordance with the procedures and instructions of the aircraft operator it serves

# Essential Requirements

- Annex VII of Reg. 2018/1139
- Responsibilities of the GHSP
  - The responsibilities of the provider are as follows (cont.):
    - Shall ensure that manuals for the operation and maintenance of groundhandling equipment are available, applied in practice and cover operation, maintenance and repair instructions, servicing information, troubleshooting and inspection procedures
    - Shall use only adequately trained and qualified personnel and shall ensure the implementation and maintenance of training and checking programmes to ensure the continuing competence of all relevant personnel
    - Shall ensure that its personnel is physically and mentally fit to execute their functions satisfactorily, taking into account the type of activity and in particular its potential safety and safety-related security impact

# Essential Requirements

- Annex VII of Reg. 2018/1139
  - Management systems
    - As appropriate for the type of activity undertaken and the size of the organisation, the provider shall implement and maintain a management system to ensure compliance with the essential requirements, manage safety risks and to aim for continuous improvement of this system. Such system shall be coordinated with the management system of the aerodrome operator
    - The provider shall establish an occurrence reporting system as part of the management system in order to contribute to the aim of continuous improvement of safety. Without prejudice to other reporting obligations, the provider shall transmit all occurrences to the reporting system of the aerodrome operator, the aircraft operator and, if relevant, to that of the air traffic service provider. The occurrence reporting system shall be compliant with the applicable Union law
    - The provider shall develop a groundhandling manual and operate in accordance with that manual. Such manual shall contain all necessary instructions, information and procedures for the service, the management system and for service personnel to perform their duties.



# Thank you very much for your attention

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## MANAGEMENT SYSTEM (MS):

	Action	Rulemaking (regulation and EASA AMC&GM)	Safety Promotion	Based on:		Objective of future rule (list the objective that EASA should achieve with this action)	Key Performance Indicators of future rules = expected benefits of the rules, which can be measurable (list indicators to measure the performance of the proposed action)	Your name
				Industry Std. and good practices	ICAO material			
1.	Develop minimum requirements for the establishment and implementation of an integrated management system for GHSP.  Scalability of the management system (MS), to reflect the context, size, nature and complexity of the services provided.	X	X	X	X	<b>Example:</b> 1. Ensure that all elements of the MS are integrated, talk to each other and information is exchanged. 2. Use a systematic approach to identify organisational hazards, aviation safety hazards, assess the associated risks and effectively mitigate their consequences. 3. Foster an organisational culture for effective safety management and effective occurrence reporting.	<b>Example:</b> 1a. Increase of indicators related to damages to aircraft, people and environment. 1b. Existence of a platform for sharing relevant safety data and information. 2a. Reduction of ground ops-related incidents and accidents, better communication of safety-relevant information. 3a. Application of the just culture principle.	Julia Egerer (JEG); Adina Szönyi (ASZ); Ruben Martín Fernández (RMF).
4.	For organisations holding multiple certificates within the scope of Regulation (EU) 2018/1139 (e.g. AOC holder doing GH self-service), develop a framework to enable implementation of a single management system to cover all its activities. Integration should remove any duplication and exploit synergies by managing safety risks across multiple activities.		X	X	X	1. Create a regulatory framework that enables integration of multiple certificates, avoiding duplications and overlapping. 2. Identify synergies of different MSs (identify the good common elements from various MSs legislations and include them in the future rules) and align the risk management across different activities	1a. Existence of guidelines for integrating GH self-service into the operator's Mgmt. System. 2a. Smooth transition from national rules to EU rules for some Member States. 2b. Increase of efficiency in the organisation's processes related to the integrated management system.	ASZ RMF
5.	Extend the scope of authority requirements to include GH.	X						
6.	Establish a framework to address outsourcing of GH services by aircraft operators and also by GHSP.	X	X			1. Reduction of unknown or uncertain factors in operations	1. Existence of a framework	Bjorn Vanden Eynde (BVE)
7.	Develop and implement an effective interface between the parties involved in GH activities. The elements of such interface should be clearly identified, i.e. they should include the safety responsibilities and the overlapping SMS aspects.	X	X	X	X	1. Pursue effective interaction and collaboration between organizations.	1. Improved communication	BVE
8.	Describe the requisites for the interface of the management systems (SMS processes) of the GHSP and the other organisations involved in GH activities. The management system of the GHSP should contain a main part applicable to the entire organisation, as well as additional elements proving compatibility with the management systems of the aerodrome(s) and aircraft operator(s) with which they interact.	X			X	1. Ensure a sustainable platform for information exchange to control risks		BVE
9.	Mandate and support swift exchange of safety-relevant information and data from occurrence reports and good practices between the parties involved in GH activities (while maintaining compliance with the General Data Protection Regulation).	X	X	X		1. Improve communication between companies so action can be taken more efficiently in dealing with safety issues	1. Reduction of incidents	BVE
10.	Ensure that the new GHSP requirements use a common taxonomy/terminology with that of the	X	X			1. When addressing an issue, a common terminology is key to avoid misunderstandings	1. Improved understanding	BVE

	existing EU requirements on management systems in other domains.											
11.	<b>Explore</b> the need to establish minimum requirements for GHSP to receive permission to operate at an aerodrome.				X					1. Avoiding that 'Cowboy' operators develop activities at aerodromes with untrained staff, unfit GSE and ignorant about safety	1. Reduction of staff issues, less safety issues	BVE
12.	Identify existing guidance on the development and implementation of a management system, interfaces and management of GHS outsourcing (e.g. in industry standards).			X	X	X	X	X		1. Ensuring that the GHSP safety standards are not being reduced by products and services provided by external organisations	1. Existence of a framework	BVE
13.	Propose ways to determine and assess the complexity of operation of GHSPs (leading to certain alleviations in the implementation of the management system for the organisations whose type of operation in a given context implies a lower level of risk).			X	X			X		1. Create a clear picture of all tasks in operations, taking into account safety, staffing, GSE needs and the number of players involved.	1 A. Reduction of safety issues B. Sufficient staffing C. Improved coordination in operations	BVE
14.	Develop guidance on implementation of a management system for inexperienced GH organisations.			X	X			X				



# OPERATIONAL STANDARDS:

	Action	Rulemaking (regulation and EASA AMC&GM)	Safety Promotion	Based on:		Objective of future rule (list the objective that EASA should achieve with this action)	Key Performance Indicators of future rules = expected benefits of the rules, which can be measurable (list indicators to measure the performance of the proposed action)	Your name
				Industry Std. and good practices	ICAO material			
1.	Identify minimum, performance-based and technology-neutral operational standards which can be applied by GHSPs across all stations and locations to allow significant improvements in performance as well as operational safety. Design a regulatory framework for the efficient coordination between air operators, aerodrome operators and GHSPs with a view to further develop, implement and apply of these operational standards.	X		X		1. Pursue common operational engagement standards that work, taking into account the type of aircraft and load factor (hold and cabin) when deploying teams of workers and assigning GSE. This to attain the highest level of safety and ensure smooth operations (turnarounds). 2. Creation of coordination platform: Improve communication between different stakeholders, avoiding double work.	1. 'Grey Areas' in operations will disappear. Less stress for workers involved in turnarounds. 2. Clear responsibilities for each stakeholder.	BVE
2.	Identify ways to recognize and promote current internationally accepted industry practices.	X	X	X		1. Point the noses in the same direction, supporting common standards and procedures 2. Create awareness	1. Standardisation of turnarounds and other operations	BVE
3.	Ensure that operational standards are communicated to the staff concerned by means of training, safety promotion, etc.		X			1. Create a positive attitude and awareness of staff towards known hazards. 2. Lift the level of professionalism	1. Increased professionalism (also 2)	BVE
4.	Define where the accountabilities of each stakeholder start and end with a view to identify overlaps and describe mechanisms to address conflicting positions and contradictory performance indicators between all parties involved in GH.	X				1. Avoiding overlaps 2. Installing a system to address conflicting positions and contradictory performance indicators	1. Less confusion about responsibilities 2. Improved communication	BVE
5.	Empower GHSP to control certain operational risks as part of their management system. That means, allow GHSPs to apply more stringent safety procedures than the aircraft operator if this is based on the GHSP's risk management process.	X		X		1. Ensure that safety is priority number one instead of commercial objectives.	1. Increased safety	BVE
6.	Propose ways to give access to safety relevant information that is specific to the aircraft model to all stakeholders.	X	X			1. Creation of a common standards manual per A/C type, with safety as its main objective	1. Less different procedures per A/C type	BVE



**STAFF TRAINING:**

Action	Rulemaking (regulation and EASA AMC&GM)	Safety Promotion	Based on:		Objective of future rule  (list the objective that EASA should achieve with this action)	Key Performance Indicators of future rules = expected benefits of the rules, which can be measurable  (list indicators to measure the performance of the proposed action)	Your name
			Industry Std. and good practices	ICAO material			
1. Establish a high-level regulatory framework for a common European training standard in the GH domain.	X		X	X	1. Ensure that that through a common standard, the quality of training programs is raised in all member states	1. Increased professionalism and safety awareness	BVE
2. Map the training elements from existing Member States requirements.	X		X	X	1. Align existing content and terminology in training programmes with best practices in GH 2. Ensure that employees receive the same basic training Europe wide	1. Increased professionalism and safety awareness 2. Reduction of safety related incidents	BVE
3. Identify the key functions involved in the GH activities.	X		X	X	1. Create a European classification of functions for GH workers	1. GH personnel perform tasks only in line with the training they received	BVE
4. Establish requirements for training delivery (types, content and methodology).	X		X	X	1. Ensure that trainers are professionals and possess the correct credentials for delivering training	1. GH personnel performs tasks in the same manner	BVE
5. Establish requirements for training management.	X		X	X	1. Enhanced oversight on delivering of training	1. Increased quality in performing tasks	BVE
6. Identify best means to avoid redundant training delivered by aircraft operators to GHSP employees.	X	X	X		1. Reduce redundant 'double' training so other training can be more elaborate 2. Provide other training or refreshers due to time saving	1. Increased professional skills and knowledge 2. See 1	BVE
7. Include flight operations officer function among the groundhandling functions.	X	X		X	1. Improve turnaround coordination, professionalise dealing with multiple providers around an A/C	1. Increased safety on the apron	BVE
8. Ensure recognition and crediting of completed training modules.	X	X	X		1. Lift the status of GH workers	1. Appreciated and well trained workers are more safety conscious	BVE
2. Propose competency-based and outcome-focused training programmes including competencies for the trainer.	X	X	X	X	1. Ensure that GHSP workers are properly trained for the tasks they have to perform. 2. Guarantee that the trainer has the proper qualifications, insight and competencies to teach complex subject matter. 3. Creating the right balance between classroom and 'field' training.	1. Reduction of safety related issues. (also 3) 2. Enhanced understanding of subject matter by trainees	BVE
3. Propose methods to maintain competencies.	X	X	X	X	1. Maintain high level of competencies through refreshers and 'parenting.'	1. Increased professionalism reduces safety issues	BVE
4. Include oversight of training in the future authority requirements.	X				1. Certification of training programs	1. Eliminating 'in house' developed, under the scope and inadequate training	BVE



# GROUND SUPPORT EQUIPMENT (GSE):

Action	Rulemaking (regulation and EASA AMC&GM)	Safety Promotion	Based on:		Objective of future rule  (list the objective that EASA should achieve with this action)	Key Performance Indicators of future rules = expected benefits of the rules, which can be measurable  (list indicators to measure the performance of the proposed action)	Your name
			Industry Std. and good practices	ICAO material			
1. Establish requirements for a GSE maintenance programme.	X		X		1. Documenting the full life cycle of equipment. 2. Reducing the safety hazards when operating GSE.	1. Improved worker's confidence in GSE 2. Less accidents, incidents and near misses	BVE
2. Recommendation to use manufacturers' instructions and industry standards to ensure that GSE is fit-for-purpose and used within the scope of tasks it is designed for.		X	X		1. Ensuring that only licensed maintenance providers work on GSE. 2. Avoiding that GSE is improperly used, reducing safety issues.	1. Less breakdowns, reducing costs (also 2)	BVE
3. Ensure that staff responsible for GSE maintenance are trained and competent to execute their tasks.	X	X	X		1. Ensuring by-the-book maintenance, avoiding risks due to breaking down of GSE	1. Increased safety	BVE
4. Support development of industry standards that promote innovation and are environmentally friendly, by promoting technology-neutral rules.		X	X				
5. Enable implementation of cost and space efficiency programmes such as equipment pooling at aerodromes.		X	X				

# OVERSIGHT:

Action	Rulemaking (regulation and EASA AMC&GM)	Safety Promotion	Based on:		Objective of future rule  (list the objective that EASA should achieve with this action)	Key Performance Indicators of future rules = expected benefits of the rules, which can be measurable (list indicators to measure the performance of the proposed action)	Your name
			Industry Std. and good practices	ICAO material			
1. Develop specific GHSP oversight requirements based on a declaration system for GHSP.	X				1. Improving declarations		BVE
2. Define elements of management of change for the competent authority.	X	X	X	X			
3. Establish a clear framework for cooperative oversight, to enable efficient and systematic mutual exchange of information on findings raised and inspections/audits made & addresses oversight and sharing of oversight tasks in case of multi-national GHSPs.	X	X			1. Promoting sharing of information and experiences	1. Establishment of a framework	BVE
4. Explore the possibility to establish a common and harmonised declaration system.	X	X			1. Promoting an effective exchange of relevant information		BVE
2. Consider industry standards when determining the oversight programme.	X		X		1. Avoiding the reinvention of the wheel		BVE
2. Develop a common framework of high-level and basic GH inspector competencies and qualifications.	X			X	1. Creating a competent, qualified and effective GH inspector unit	1. Professional and clear reports	BVE
3. Within the competent authority, ensure coordination between different oversight activities to exchange information on audits performed by aircraft operators and aerodromes on GHSPs.		X					



# STAFF TURNOVER:

Action	Rulemaking (regulation and EASA AMC&GM)	Safety Promotion	Based on:		Objective (list the objective that EASA should achieve with this action)	Key Performance Indicators of future rules = expected benefits of the rules, which can be measurable (list indicators to measure the performance of the proposed action)	Your name
			Industry Std. and good practices	ICAO material			
1. Develop rostering systems to allow more precise planning. Encourage GHSPs to assess their operational risks emanating from the need for new employees, potential excesses in the workload, an uneven work distribution and work pressure.		X			1. Improving job satisfaction: an important requirement to carry out safe operations. Indeed, it promotes concentrated behaviour at work, and thereby safe behaviour. It includes a good physical and mental state during normal working periods, a good contact with colleagues, and an adequate job pressure, which is, amongst others, assured by a sufficient size of the staff. Work should be appreciated in an adequate manner by the employees' foreman/supervisor as well as by the colleagues, clients and the airport operator. This will promote the job satisfaction, hence safe operations 2. Avoiding excessive staff turnover	1. Less staff issues (in the broadest sense)	BVE
2. Encourage GHSPs to assess impact of outdated GSE that make the work on the ramp at times more physically demanding than necessary.		X			1. Considering human factors when GSE is being operated and acquired.	1. Less occupational health issues	BVE
3. Coordinated high level communication strategy to enhance the perception of the GH sector as a crucial element of the aviation safety chain.		X			1. Lifting the status of GH workers 2. Increasing safety awareness (passengers and staff)	1. Increased professionalism and authority 2. Less safety breaches	BVE
4. Create a system of training recognition throughout the sector via common training methodologies and standards that build on existing industry standards and best practices.	X		X		1. Creating perspective for workers 2. Increasing staff mobility	1. More experienced staff, long term commitments 2. Skilled and licensed European workers in European airports	BVE

Contribution ID: 2cd9014d-f9d6-4843-9956-520bb04203ba

Date: 14/10/2019 07:19:18

## Draft ToR RMT.0728 Issue 1

Fields marked with \* are mandatory.

### Introduction

---

Dear Advisory Body Member, Observer, Alternate,

You are invited to comment on the draft ToR RMT.0728 'Development of requirements for ground handling' Issue 1.

Please submit your comments on the draft ToR below under 1-8 (closed questions) and under 'Your comments'.

Please note that comments can only be accepted from formal Advisory Bodies' Members.

For any issues, please contact [AB\\_consultation@easa.europa.eu](mailto:AB_consultation@easa.europa.eu)

Kind regards

Better Regulation Team

Please find the draft ToR and the formal invitation letter on the upper-right side of your screen under 'Background Documents'.

### Contact information

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\* Membership in the following Advisory Bodies

- ☐ MAB
- ☐ ADR TeB
- ☐ ATM/ANS TeB
- ☐ Air Crew TeB
- ☐ Air OPS TeB
- ☐ GA TeB
- ☐ Production & Continuing Airworthiness TeB
- ☐ Safety Management TeB
- ☒ SAB
- ☐ ADR STeB
- ☐ ATM/ANS STeB
- ☐ FS STeB

- ☐ GA Sectorial Committee
- ☐ Design & Manufacturing STeB
- ☐ Engineering & Maintenance STeB
- ☐ Rotorcraft Sectorial Committee

\* Name

Nikki Jones

\* Your email address

nikki@nikkijones.me.uk

## Any comments?

---

\* Do you have comments on this ToR?

- ☒ Yes
- ☐ No

## 1 - Issue/Rationale

---

\* Do you support rulemaking on this issue?

- ☒ Yes
- ☐ No

## 2 - Objectives

---

\* Do you support the RMT's objectives as described in the ToR?

- ☐ Yes
- ☒ No

## 3 - Activities

---

\* Do you support the proposed activities to achieve the objective?

- ☒ Yes
- ☐ No

## 4 - Deliverables

---

\* Do you support the choice of deliverables?

- ☐ Yes
- ☒ No

## 5 - Consultation

---

\* Do you support the proposed consultation method?

- ☐ Yes  
☒ No

## 6 - Interface issues

---

\* Do you agree with the described interface issues?

- ☒ Yes  
☐ No

## 7 - Profile and contribution of the Rulemaking Group

---

\* Do you support the proposed profile of the rulemaking group and its members?

- ☐ Yes  
☒ No

## 8 - Reference documents

---

\* Do you support the choice of reference documents?

- ☒ Yes  
☐ No

## Your comments

---

### Comment(s)

**(Please start each comment with clear indication to which line number(s) in the ToR your comment refers).**

*5000 character(s) maximum*

Add your general comments.

ETF comments on Terms of Reference (ToR) for rulemaking task (RMT).0728  
Development of requirements for ground handling

ETF wish to add the comments below to the ToR for RMT.0728

ETF request that RMT 0728 becomes an external rule making task with the formal formulation of a rule making group. The current informal expert group has served well to prepare the ground for this new area of rulemaking, ETF has concerns that the membership of this group could become unmanageable and unbalanced. It is clear EASA require the expertise of external stakeholders and therefore should follow the rule making process to set up an external rulemaking group and call for nominations.

Staff Turnover - Line no. 245 – 254



The business volume on an airport depends on the season, weekday, and even time of the day. Although main hubs are able to overcome this effect, small regional airports often struggle to stimulate their activity during the off-peak season and off-peak hours. GH duties and staff are positively correlated with this trend in demand.

Due to this fact, and considering also that shifts might be split, late night or very early morning shifts, GHSPs are often unable to attract staff for longer periods, leading to a high staff turnover. This leads GHSPs to constantly hire and re-train new and often unexperienced staff which is costly, creates an additional strain on the more experienced staff, and ultimately has a negative impact on safety.

ETF believe it is too simplistic to blame high staff turnover just on peaks and flexibility issues. We should also consider low wages, company culture, culture of workers and other human factors when addressing staff turnover.

ICAO dedicated a chapter on human factors in the Manual on Ground Handling (Chapter 4, 4.5).

From the manual, p. 35:

A company's culture and organizational attitudes can have considerable influence on individuals and group behavior. A positive culture should be established which promotes employee involvement and commitment at all levels.

ETF believe:

1. Employee involvement is under pressure in an environment where automation of processes is the mantra. More technology means less participation by the workers.
2. It is also my opinion that the culture of the workers has an influence on individuals and group behavior. For instance risk perception, communication, reporting and leadership styles differ from culture to culture and can cause friction on the work floor. New staff confronted with this and without clear support and guidance from management, TL's, supervisors etc. leave the company faster.
3. Over 90% of accidents involving damage to aircraft and infrastructure are attributed to human factors by the industry. One of the causes ICAO mentions is a failure to follow standard operating procedures. This failure could be related to culture.

Understanding the differences between different cultures of workers within a company could be a way to reduce staff turnover. That goes also for workers understanding the company's culture.

ICAO states in 4.5.7. (p.35) that GHSP's should conduct an analysis of the human factors aspects of their operations and organization. Understanding the sensitivities of different cultures and letting workers contribute to the company's culture, can lead to less safety issues but also to less staff turnover.

ETF supports the following:

1. Oversight: lines 178 to 180:

Without a regulatory framework for oversight of GHSPs, there is a risk that GH staff training and skills could deteriorate, which could lead to a general degradation of safety in GH, since many occurrences are linked to human factors.

2. Operational standards: lines 214 to 216:

In an attempt to minimise the groundhandling safety risks, some organisations have already developed harmonised operational standards and recommended practices. The wider application of these industry standards and practices is expected to improve the aviation safety.

This is a very important - Harmonisation of operational standards is a key point for ETF. However, we should have more information about what is meant by industry standards. Are we talking about airline standards, Aerodrome standards, GHSP standards...?

The ToR document refers to the ICAO manual. This is very positive for ETF.

Many of the items listed in the ToR are safety related and our comments have supported this. The Staff Turnover and other elements have both a safety impact and a social impact (social elements that could have an impact on safety), in the NBR socio economic factors have to be assessed. The ToR must include reference to Article 89 and Article 115 of Regulation( EU) 2018/1139 to allow this impact assessment to be completed.

## **Background Documents**

[Draft ToR\\_RMT.0728.pdf](#)

[letter Consultation Draft ToR\\_RMT.0728.pdf](#)

## **Contact**

[AB\\_Consultation@easa.europa.eu](mailto:AB_Consultation@easa.europa.eu)



### **3. FLIGHT TIME LIMITATIONS FOR AIRCREWS**

The JAC looked at EPAS and identified a list of possible safety issues relevant to the group for their involvement and possible participation as a stakeholder.

#### **EPAS**

- 5.1.2 RES 006 FTL effectiveness
- 5.1.2 SPT 079 CRM best practice (closed I think)
- 5.2.7 RES 003 Cabin Air Quality
- 5.2.7 RES 016 Fire risks with PEDs
- 5.2.7 MST 005 Smoke fumes
- 3.6.2 SPT 100 Safety promotion disruptive pax
  
- 6.1.0 RMT 0560 Halon update and standards
- 5.1.1 SMT 026 related 001, 002, 003, 028, 057, 059 SMS assessment
- 5.5.2 MST 023 Better EU wide reporting from NAAs
- 6.2.0 RMT 0513 A/C noise
- 5.1.2 RMT 599 CBT
- 5.1.2 FOT 003,004 unavailability of competent personnel.

Pilot specific:

- 5.1.1 SPT 76, 77 FDM
- 5.1.2 RMT 596 provisions for examiners and instructors
- 5.1.3 RES 013 recovery of flight data recording
- 5.2.1 RES 005 Startle effect
  - 010 Ice crystals
  - 017 Super large droplets
  - MST 004 Loss of control in-flight
  - SPT 012 Pilot Training.
- 5.2.4 RMT 393 Maintenance check flight
- 5.2.0 RMT 573 fuel planning (associated with SPT 097), 417 – sterile flight deck procedures
- RMT 118 wing contamination.

#### **FS.TEC FTL/FRM sub group – FTL experts from industry**

Part of the remit of this group is to look at technical issues on FTL and give clarity on the implementation of the FTL regulation.

EASA's response to question #13: Some operator organisations and members of the FS.TEC have brought to the attention of EASA the fact that in their view, the current answer to FAQ # 13 goes beyond the existing legal provisions addressing the topic at stake.

On the 27<sup>th</sup> September 2019 EASA published a revised answer to FAQ #13 requesting feedback from members of the FS.TEC.

ETF responded to EASA's request and provided a short crew survey.

***Annexes:***

Annex 4: ETF ECA Letter FTL FAQs LT 060619

Annex 5: ETF comments FTL FAQ 13 211019

Annex 6: UNITE Survey FTL changes on or after report (October 2019)



Patrick Ky  
Executive Director  
EASA  
D - Köln

Sent by email: Patrick.Ky@easa.europa.eu

cc: - Jesper Rasmussen  
- Claudio Trevisan  
- Filip Cornelis, DG MOVE

Brussels, 06/06/2019

## **Re: 'Frequently Asked Questions' – towards harmonised FTL implementation**

Dear Patrick,

To prevent aircrew fatigue on board of Europe's aircraft, one of the most basic preconditions is that all stakeholders have a clear, uniform understanding of today's FTL rules and related Fatigue Risk Management requirements. Only then can we collectively achieve a harmonised implementation of the rules by Europe's air operators, their harmonised understanding by the crew, and a harmonised, effective enforcement by the National Aviation Authorities.

ECA and ETF therefore welcome and support the Agency's efforts to achieve such harmonised understanding, implementation and oversight. The recent establishment of the FS.TEC/FTL-FRM group is a good example: it allows airline and aircrew experts to identify and discuss interpretation / implementation problems, and to assist the Agency in providing its technical understanding of specific aspects of the rules. The recent FTL/FRM checklist for Inspectors is a further positive example which, we hope, will help to improve the NAAs' shortcomings in their FTL-related oversight.

Another – and absolutely crucial – tool are the EASA 'Frequently Asked Questions' on FTL, which have been in place for 5 years, and are being further developed, complemented and enhanced over time. Given the complexity of EASA's FTL rules, the significant commercial pressures on the airlines to interpret the rules in an as lenient manner as possible, and the NAAs' difficulties to properly oversee their operators, ETF and ECA consider these FAQs as an essential pillar of the Agency's work towards a harmonised understanding, implementation and oversight of FTL rules. They are also a necessary tool for the operating crew to gain clarity especially when it has been found that in many cases operator training on FTL falls short of the FTL syllabus.

We are aware that some air operators and their associations may prefer a certain degree of legal ambiguity – allowing them to cater for their commercial needs. However, to ensure rules are applied properly, there must be an as high degree of legal certainty as possible, and it is crucial that this is also captured in a tool like the FAQs and promoted



**ECA** Piloting  
Safety  
European Cockpit Association



**EUROPEAN TRANSPORT  
WORKERS' FEDERATION**

to all stakeholders. The FAQs also assist the Agency, in its standardisation/monitoring activities, to evaluate the NAAs' oversight and enforcement of the rules, and some of the FAQs have actually been raised by the NAAs themselves and been clarified to help inspectors carry out their task.

ECA and ETF are aware that it is not up to the Agency to formally interpret EU Law – which is ultimately up to the European Court of Justice. However, national court cases and ECJ decisions take years – and substantial financial resources – to complete and are therefore a sub-optimal and entirely disproportionate tool to ensure legal certainty in any useful manner. For the day-to-day decisions that air crew need to make and for the daily oversight work done by national inspectors, a pragmatic, concrete and readily available tool, such as the FTL FAQs, is therefore an absolute must.

While we have stressed previously that the process of generating the FAQs can still be improved (incl. stakeholder input on the draft final versions before publication, regular but less frequent updates, and regular joint meetings between the FS.TEC subgroup and its NAA counterpart), we equally believe that numerous parts of the FAQs would merit to be 'translated' into GM and AMC material.

Finally, please let us stress that in times of rapid growth in air traffic, crew shortages in certain segments of our industry, and increasing delays and roster disruptions due to ATM capacity constraints and staff shortages, severe pressure is put both on the airlines' rostering departments and on individual crew members. For aircrew it is therefore crucial to have a clear understanding of their rights and obligations under the rules, on when their operator crosses 'red lines', and to be confident that their NAA shares the same understanding and is able to enforce this. The FAQs are therefore an essential element in the system to support and progress a much-needed harmonisation.

With best regards,

Philip von Schöppenthau  
ECA Secretary General

François Balletero  
ETF Political Secretary Aviation





In considering our response to the on-going discussion surrounding the EASA FTL FAQ #13; Can a rostered FDP be changed (re-planned) after crew members have reported? The consequences of this answer have significant daily impact, on real-life, day-to-day experience for crew and their fatigue. To help demonstrate our position, we ran a short illustrative survey of UK cabin crew across all airlines with 7626 responses. See attached Unite the Union (member of ETF) survey. We have used some of the information from this survey in the ETF response below.

We ask three fundamental questions and have considered each one separately, and the individual consequences within the framework of all three. As a baseline assessment, we believe that any change on the day, at or after report shall be described as an 'unforeseen change/circumstance' regarding the aircrew member because it is not 'planned'. Alternatively, it could be stated that whilst not falling into the strict definition of planned or unforeseen, the industry still needs the ability to adapt the crewing of their operation at short notice – we have stand-by for this eventuality, with distinct controls, otherwise all crew are in a permanent state of stand-by within a Maximum Flight Duty Period.

- 1) Do we consider on-the-day changes to the planned Flight Duty Period that are within the limits of the Maximum Flight Duty Period are allowed and deemed fully compliant within the prescriptive use of FTL?
  - 2) Do we consider the provisions to change a planned Flight Duty Period on-the-day are already and only provided for in Commanders Discretion and Delayed Reporting because they are 'unforeseen changes/circumstances'?
  - 3) If changes on-the-day to planned Flight Duty Periods were considered as an implied compliance within the specific areas of regulation that cover Flight Duty Periods and Maximum Flight Duty Periods in the creating phase of FTL, is the known practical application of technical wording creating non-compliance within other sections of the FTL regulation and thereby creating fatigue in aircrew where a lack of oversight keeps it hidden?
- 1) Do we consider on-the-day changes to the planned Flight Duty Period that are within the limits of the Maximum Flight Duty Period are allowed and deemed fully compliant within the prescriptive use of FTL?
    - What basis in law does this assumption have weight?
    - Operators suggest that it must be expressly forbidden otherwise it is permissible? Therefore, reporting at base in a state of unknown acclimatisation is permissible because it is not expressly forbidden in the FTL regulation. In accepting this principle, the clear majority of FTL becomes redundant. This will be the ultimate result of a decision if this question is answered – yes.
    - Up to 95%\* of crew state they have their duties increased on the day. An overall average of 65% report changes on the day, and all short haul carriers (ex. BA) reporting between 70% to 95%.
    - Up to 75%\* of crew have increased number of sectors on the day.
    - 83%\* state these changes have had a knock-on effect to their forward rosters.
    - 91%\* of Short haul crew responded that these changes and effects have an additional impact on their fatigue.
    - We have found no mention of these changes on the day being expressly catered for in the CRD or any other supporting material as incorporated into FTL. The implied assumption and opinion of operator groups is that any duty change that falls within the Maximum Flight Duty Period is compliant, regardless of impact on planned post duty rest and or disruption to the planned forward roster.
    - We have found no mention of changes on the day being expressly catered for in the CRD or any other supporting material. However, it is mentioned in several places that operational flexibility is required, and re-planning does occur. Therefore, we find it incomprehensible that FTL was written with such fundamental flexibility requirements for the industry left unwritten and without any oversight, whilst other aspects of operational flexibility are recorded and provided for in both Commanders Discretion and Delayed Reporting.
    - Are we to believe that an implied compliance without specific detail is exempt from implied compliance to regulations that deal with oversight and performance verification on such an intrinsic element for aircrew protection against fatigue – the oversight of planned against actual flight duty periods and rest requirements?
    - Without oversight, how can we know that the prescriptive intent of ORO.FTL.115(b) where a crew member is obliged to plan and use their rest periods to be appropriately prepared for an FDP, has been complied with?
    - Without oversight, how can we be sure of the compliance to ORO.FTL 110
      - a. publish rosters sufficiently in advance to provide the opportunity for crew members to plan adequate rest.
      - b. Ensure flight duties 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 in all circumstances.

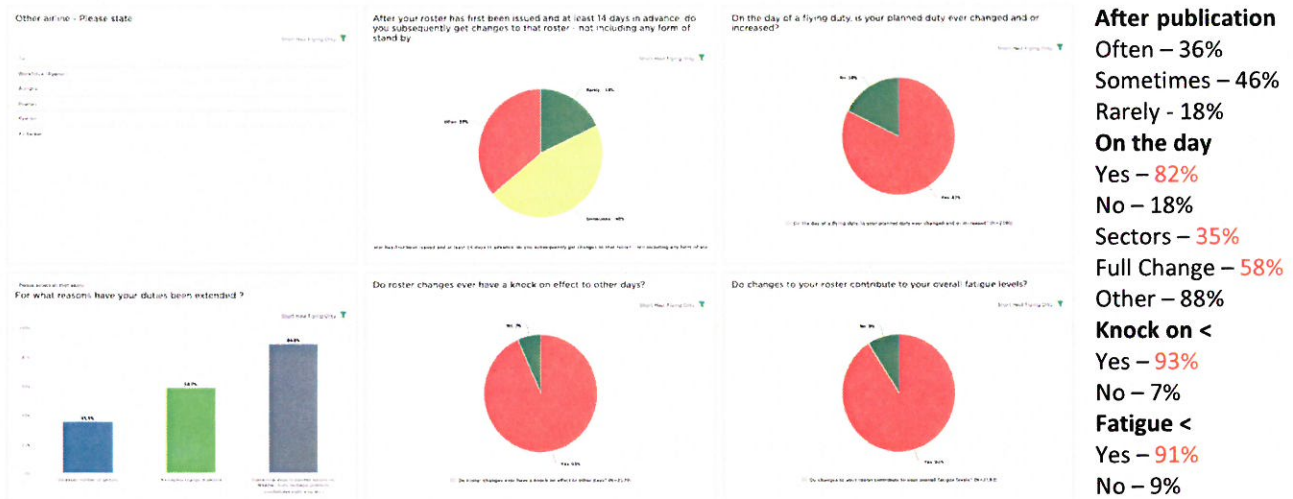




d. Take into account the relationship between the frequencies and pattern of flight duty periods and rest periods and give consideration to the cumulative effects of undertaking long duty hours combined with minimum rest periods.

- The CRD states - 174. *The Agency believes that FRM provisions are an indispensable part of this proposal. Although FRM is only mandatory when operators intend to benefit from more relaxed limits in limited areas of the proposed flight time specification scheme, the conditions that have to be complied with in order to do so have to be described in detail.*
- The following agency comment from the CRD should be realised. Possibly through the insistence for the training of schedulers and crew controllers to assess the planned duties, the impact of changed duties on rest periods and forward rosters, thus becoming responsible for the fatigue protection of the crew and overseen by the NAA. 179. *Operators are responsible to manage all operational risks, including those arising from crew member fatigue. The Agency believes that compliance with prescriptive FTL is not always enough to guarantee that crew members remain sufficiently free from fatigue so that they can operate to a satisfactory level of safety under all circumstances. Fatigue management training will increase awareness and shall help identify possible fatigue related hazards, even in operations entirely compliant with prescriptive FTL.*

**Graph 1\* – Short Haul changes on the day (2282 UK respondents)**



**2) Do we consider the provisions to change to a planned Flight Duty Period on-the-day are already and only provided for in Commanders Discretion and Delayed Reporting because they are 'unforeseen changes/circumstances'?**

- Noting the only sections in the CRD to NPA 2010-14 that specifically refer to changes after report for the adjusting of crew schedules. Comment within the Standby section states; 373. *Operator organisations argued that the NPA proposal in OR.OPS.FTL.230(a) should be clarified to make it clear that this should not apply to re-planning in actual flight operations. Airlines often need to re-plan crew (for example crew who were originally assigned to conduct a flight which has been cancelled and who are therefore re-planned into standby). The operator organisation therefore suggests amending this paragraph to read '(a) Standby shall be rostered and the affected crew members shall be notified in advance, except when re-planned into standby'. The Agency notes that the NPA and this CRD contain a separate provision for unforeseen circumstances in actual flight operations, which allows adjusting crew schedules in the event of unforeseen circumstances.*
- CRD states in 282. *One scientist recommended the use of 'delayed reporting' provisions to cater for situations such as aircraft becoming unserviceable shortly before reporting. According to his report short-term changes of this nature should be accommodated in FRM rather than in a general FTL. Another scientist stated that this is not a problem as long as the overall wakefulness times from the prescriptive scheme are observed; he would see a potential fatigue impact only if FDP needed to be*



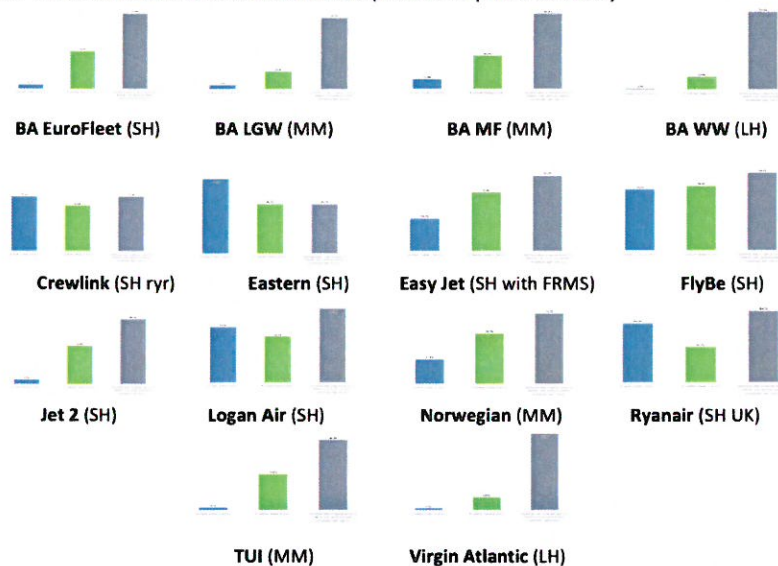
extended. The third scientist found the provisions acceptable as proposed provided they allowed crew members to anticipate rest. Perhaps the view of actual crew could provide a clearer picture?

- 83%\* of crew state that changes have a knock-on effect to forward rosters.
- 82%\* of crew state that roster changes have an impact on their fatigue levels.

- 3) If changes on-the-day to planned Flight Duty Periods were considered as an implied compliance within the specific areas of regulation that cover Flight Duty Periods and Maximum Flight Duty Periods in the creating phase of FTL, is the known practical application of technical wording creating non-compliance within other sections of the FTL regulation and thereby creating fatigue in aircrew where a lack of oversight keeps it hidden?

Graph 2\* (key: Blue = Increased sectors on the day, Green = A change of flights, Grey = Delays, slots, weather, tech etc.)

QC) For what reason have duties been extended (Airlines in alphabetical order)



- Without oversight, how can we know that the prescriptive intent of ORO.FTL.115(b) where a crew member is obliged to plan and use their rest periods to be appropriately prepared for an FDP, has been complied with?
- Without oversight, how can we be sure of the compliance to ORO.FTL 110
  - a) publish rosters sufficiently in advance to provide the opportunity for crew members to plan adequate rest.
  - b) ensure flight duties 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 in all circumstances.
  - c) take into account the relationship between the frequencies and pattern of flight duty periods and rest periods and give consideration to the cumulative effects of undertaking long duty hours combined with minimum rest periods.

Graph 3\*

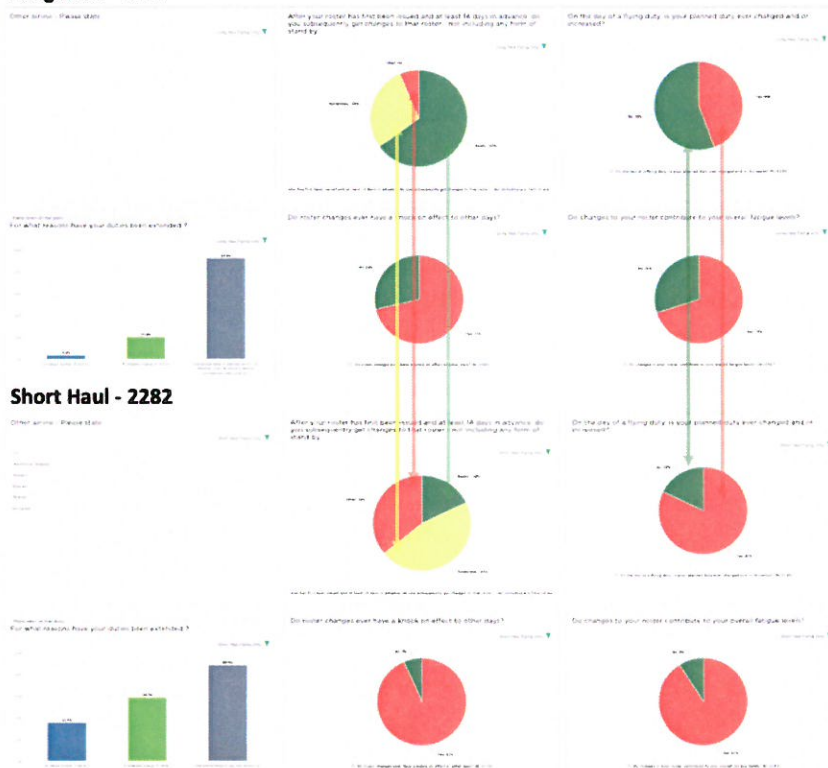
Mixed Mode - 2583





Graph 4\*

## Long Haul - 2724



- AMC1 ORO.FTL.110 a) j)
  - a) Rosters should be published 14 days in advance
  - j) The operator should establish and monitor performance indicators for operational robustness of rosters – for compliance, only planned and actual roster assessment can offer this information.
- **ORO.FTL.240 Nutrition** - How is this provided for, we know only of **one** operator that has included any guidance in the OMA on how they will achieve this implementing rule;
  - (a) During the FDP there shall be the opportunity for a meal and drink in order to avoid any detriment to a crew member's performance, especially when the FDP exceeds 6 hours.
  - (b) An operator shall specify in its operations manual how the crew member's nutrition during FDP is ensured.

If an operator changes a rostered FDP at or after report how does the operator ensure compliance?

## From the Scientific Reports:

- Therefore, the complexity of the underlying mechanisms of fatigue and the complexity of the link between fatigue and safety suggest that prescriptive approach only based on duty limitations will not be sufficient to manage this specific risk. It emphasises the need for managing fatigue and safety globally and therefore the relevance of a fatigue risk management system fully integrated into the safety management system.
- Question 9 page 16
 

Short term re-planning raises the issue of aircrew preparation and sleep planification. The proposed rules applying to split duty and reduced rest seems acceptable as they allow crew to anticipate on her/his rest preparation. However, the frequency of these short-term re-planning should be limited and carefully monitored in the framework of the frms.
- 166. Two scientists advocated the use of FRM also within the prescriptive limitations as a way to manage safety in the framework of the Airline Safety Management System. They especially highlighted that the following fatigue-related risks could efficiently be addressed through FRM: short-term re-planning;
- Page 28 mid 4<sup>th</sup> paragraph
 

....Therefore we consider FRMS both as a useful means to control the deviation from prescribed limitations but more generally as a crucial approach to manage the risk associated with operations that may disrupt the normal aircrew sleep/wake cycle, even when they in the prescribed limitations.
- DLR Table 1





*Q9 – Short term re-planning – Relevant operation – All, Fatigue component affected – All, Mitigation - FRM*

**Summary – with data taken from UNITE the UNION Duty Changes on the Day survey.**

We believe that the number of changes that Aircrew are being subjected to, the impact on their rest periods and forward rosters is completely unknown. Our data suggests that far from being isolated events, these are wide spread and in the crews', own words – a significant contributory factor to fatigue. This practice is not infrequent and used as a reasonable expectation to maintain smooth operations when things go wrong. This activity is invisible because it is not written as a permitted practice and therefore is not mandated for recording.

We have included some of the 1700 comments that aircrew submitted to us in the Unite Survey Overview document. EASA will be in no doubt of the negative influence and increased fatigue levels this is having on Aircrew. With the information provided we ask EASA to maintain their current response to FTL FAQ #13 that requires operators to implement predictive fatigue hazard identification prevention processes if operators change rosters on or after report.

- Short haul aircrew are subject to the most roster changes.
- On average 82% of cabin crew believe that roster changes contribute to their fatigue levels.
- An overall average of 65% report changes on the day with all short haul carriers\* reporting between 70% to 95%.
- An increase in the number of sectors on the day are reported in Short haul operators at; 70%, 38%, 75%, 6%, 75% and 27%.
- A change of sectors on the day for all types of flying is reported at; 17%, 15%, 40%, 24%, 45%, 44%, 56%, 62%, 52%, 78%, 42%.
- Changes produce knock on effects to planned short haul rosters from 57% to 98%.
- How varied are these changes from the planned duty and rest periods, not only in length but where they vary with regards to the cabin crew members sleep / wake cycle – planned vs achieved rosters.
- How does EASA expect demonstrate compliance with the intent of ORO.FTL.110 a) if changes are permitted with the regularity we see?
- Does ORO.FTL.110 a) only prevent fatigue by the planning of the duty in advance i.e. a work of fiction?
- If the planned rest periods are effectively moved by the changes, how should this be monitored and managed to ensure compliance with the ORO.FTL.110 a)?
- Roster changes on the day that have an impact on forward rosters are significant. Does the monitoring of cumulative duty hours (weekly, monthly and annually), minimum rest periods and flight hours satisfy compliance to AMC1.ORO.FTL a) & j)?
- How are operators ensuring compliance with ORO.FTL.240 a) & b) in these last-minute changes to planned duties?
- How can crew comply with ORO.FTL.115 a) and b) – and make optimum use of the opportunities and facilities for rest provided and plan and use their rest periods properly.
- ORO.FTL 120 b) 2) provides that; f) The operator should develop and keep current FRM documentation that describes and records: scheduled and actual flight times, duty periods and rest periods with deviations and reasons for deviations; and
- As duty changes are not explicitly provided for in FTL and due to the insignificant or drastic impact on the philosophy of FTL being maintained, irrespective of best practice, should duty changes be explicitly covered under ORO.FTL 120b) 2)?
- Are current rostering practices only compliant because they haven't been checked?

For the reasons explained in our e-mail dated 26<sup>th</sup> September 2019 and following the Unite survey and the evidence provided ETF does not support EASA's proposed new text for FTL FAQ #13 and believe it is in breach of Regulation (EU) No. 83/2014.

Best Regards,

Nikki Jones and Kris Major  
ETF





## UNITE the UNION – Duty Changes on or after report – October 2019

### Outline

The survey received over 7,300 responses from cabin crew (and some pilots {73}) in 5 days.

The answer to Question 13 of EASA FTL FAQ has caused some serious resistance from operator groups. The problem surrounds the extent to which the regulations require operators to monitor the robustness of aircrew rosters. In particular, changes on the day and are operators able to increase a duty by increasing the number of sectors or switching the same number of sectors for longer ones. The issue of delays to planned sectors isn't questioned here.

EASA have stated in the FAQ that operators should only increase a duty day if they have implemented a predictive fatigue hazard identification prevention process that assesses the potential increased risk of the new duty against that of the planned.

Operators claim that the regulations do not require them to do this, instead they claim that any change on the day that falls within the planned Maximum Flight Duty period is perfectly legal and all other regulatory restrictions such as cumulative duty periods and maximum flight hours are suffice.

Operators also claim that they do not change duties excessively or that these create any increased fatigue risk from being required to produce rosters 14-days in advance that offer a chance to plan rest and work periods. Operators claim any changes do not create a non-compliance or actual safety risk issue. Without relative data and reference to GM ORO.FTL 110 j), an operator cannot confirm that the requirement of EU 83/2014 is being achieved.

In principle, they claim that unless something is expressly forbidden then it is acceptable. However, Acclimatisation rules do not state that aircrew should report at Home Base in a state of known acclimatisation.

This only serves to demonstrate that the application of FTL failures is not as intended, which is essentially an experienced based application of practical solutions laid down in the most appropriate words available but instead it is a lawyers' legal assessment of semantics.

We designed a survey to discover if changes take place after roster publication, if changes occur on the day, the regularity, if duties are increased in time and a broad indication of why. We did not ask for the legitimacy of the changes. We did not scrutinise multi-base/multi-state operators to assess any differences in base or member state.

The data, without being comprehensive, portrays a trend of frequently altered and unpredictable rosters which would appear to be counter to what EASA envisioned with roster transparency to be from questions 12 & 13. EASA should be significantly worried with the frequency we have found. We reasonably, assert that EASA should express in question 13 that operators must demonstrate their compliance to FTL roster robustness requirements by ensuring that roster changes are not currently creating fatigue cumulatively if the change affects forward rosters and planned rest periods.

Consideration must be given in this circumstance that planned rosters published 14 days in advance can be very different from an achieved crew roster which doesn't give crew the opportunity to plan adequate rest. The survey did not include stand-by which again has an impact on roster stability added to changes on the day.

### The survey

The questions:

Over the traditional housekeeping compromising airlines, bases, long, short or both modes of flying. We asked very simply;

QA) After your roster has first been published 14-days in advance, do you get changes – not including any form of Stand-By?

QB) On the day of a flying duty is your planned duty ever changed and or increased?

QC) For what reasons have your duties been extended – increased number of sectors, a complete change of sectors, operational delay to planned sectors including, slots, weather, technical problems, unscheduled nightstops etc.?

QD) Do roster changes ever have a knock-on effect on to other days?

QE) Do changes to your roster contribute to your overall fatigue levels.

QF) Do you have industrial agreements and do they address roster changes?

### The results

Firstly, a general look at the results, a look at on-the-day changes, a comparison between long, short and both modes of flying, airline specific. We also asked for those with collective agreements and if they considered that changes were covered in those agreements. We have no way of knowing if the mitigations in those agreements are compensatory or restrictive and to what extent.

### Summary

After the results, you will see where we believe serious questions remain on how planned legally compliant rosters are maintaining compliance to 83/2014 in full and preventing an actual fatigue risk.





## UNITE the UNION – Duty Changes on or after report – October 2019

### General – 7626 responses

**QA) After your roster has first been published 14-days in advance, do you get changes – not including any form of Stand-By?**

Often – 19%, Sometimes – 30%, Rarely – 40%

**QB) On the day of a flying duty is your planned duty ever changed and/or increased?**

Yes – 65%, No – 35%

**QC) For what reasons have your duties been extended –**

i) increased number of sectors, - 18%

ii) a complete change of sectors, - 42%

iii) operational delay to planned sectors including slots, weather, technical problems, unscheduled nightstops etc.? – 90%

**QD) Knock on effect Do roster changes ever have a knock-on effect on to other days?**

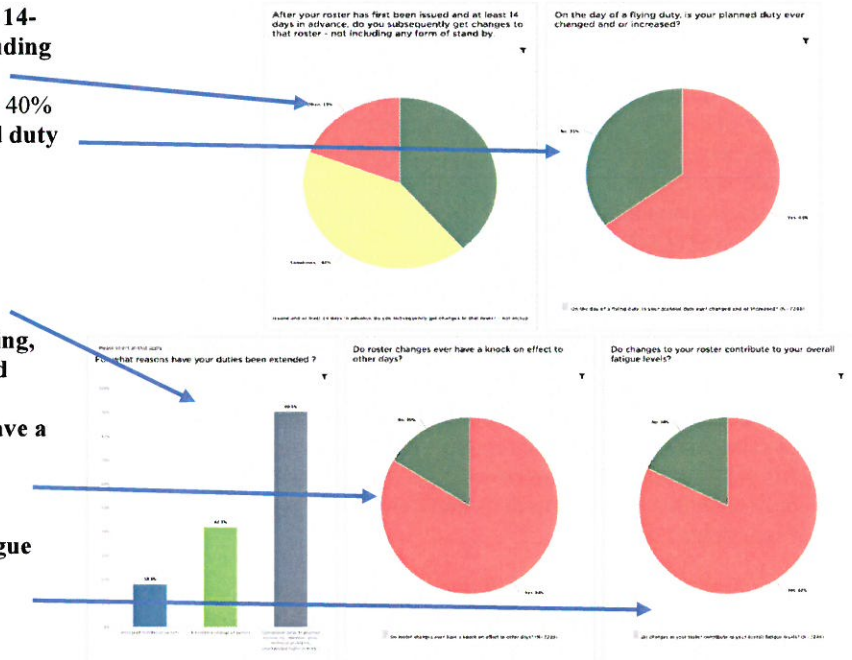
Yes – 83%

No – 17%

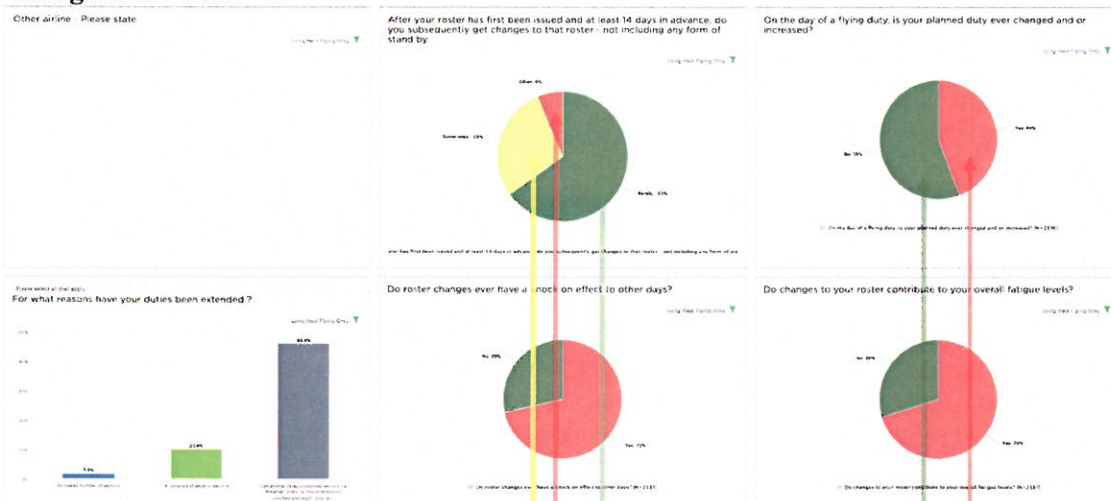
**QE) Do roster changes contribute to your Fatigue**

Yes – 82%

No – 18%



### Long Haul - 2724



#### After publication

Often – 6.5%

Sometimes – 28%

Rarely – 65%

**On the day**

Yes – 44%

No – 56%

Sectors – 3.5%

Full Change – 20%

Other – 92%

**Knock on <**

Yes – 85%

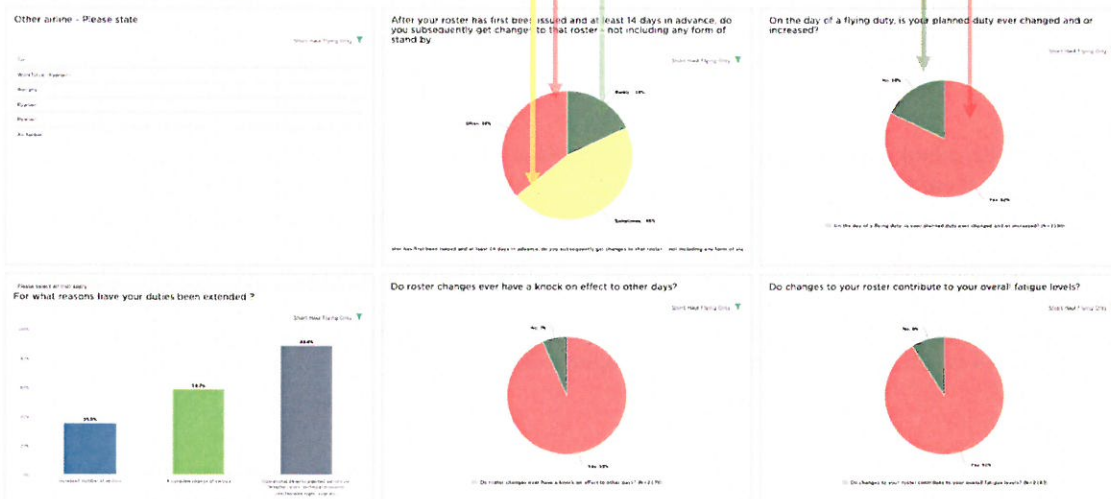
No – 15%

**Fatigue <**

Yes – 85%

No – 15%

### Short Haul - 2282



#### After publication

Often – 36%

Sometimes – 46%

Rarely – 18%

**On the day**

Yes – 82%

No – 18%

Sectors – 35%

Full Change – 58%

Other – 88%

**Knock on <**

Yes – 93%

No – 7%

**Fatigue <**

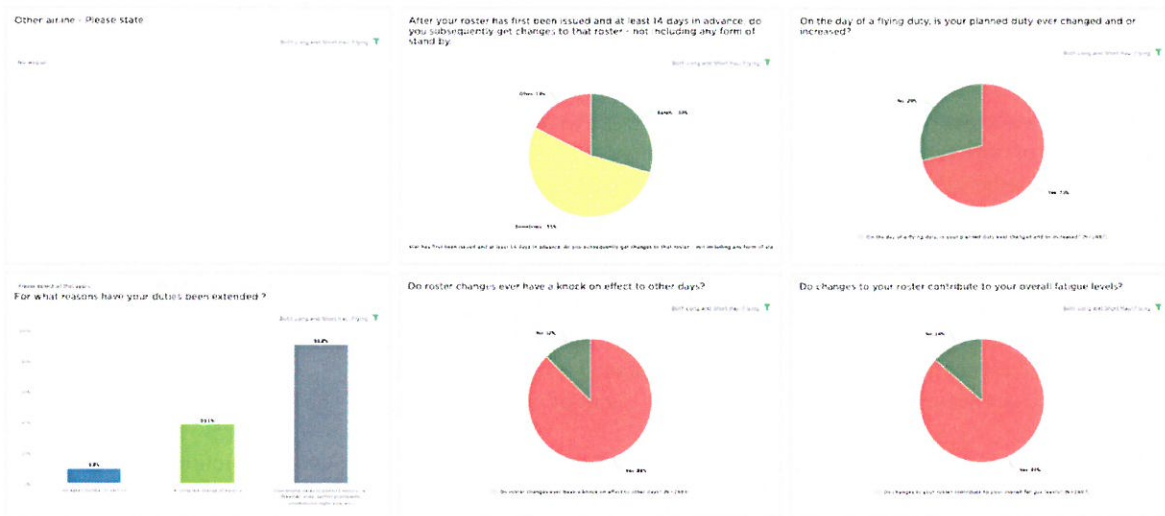
Yes – 91%

No – 9%

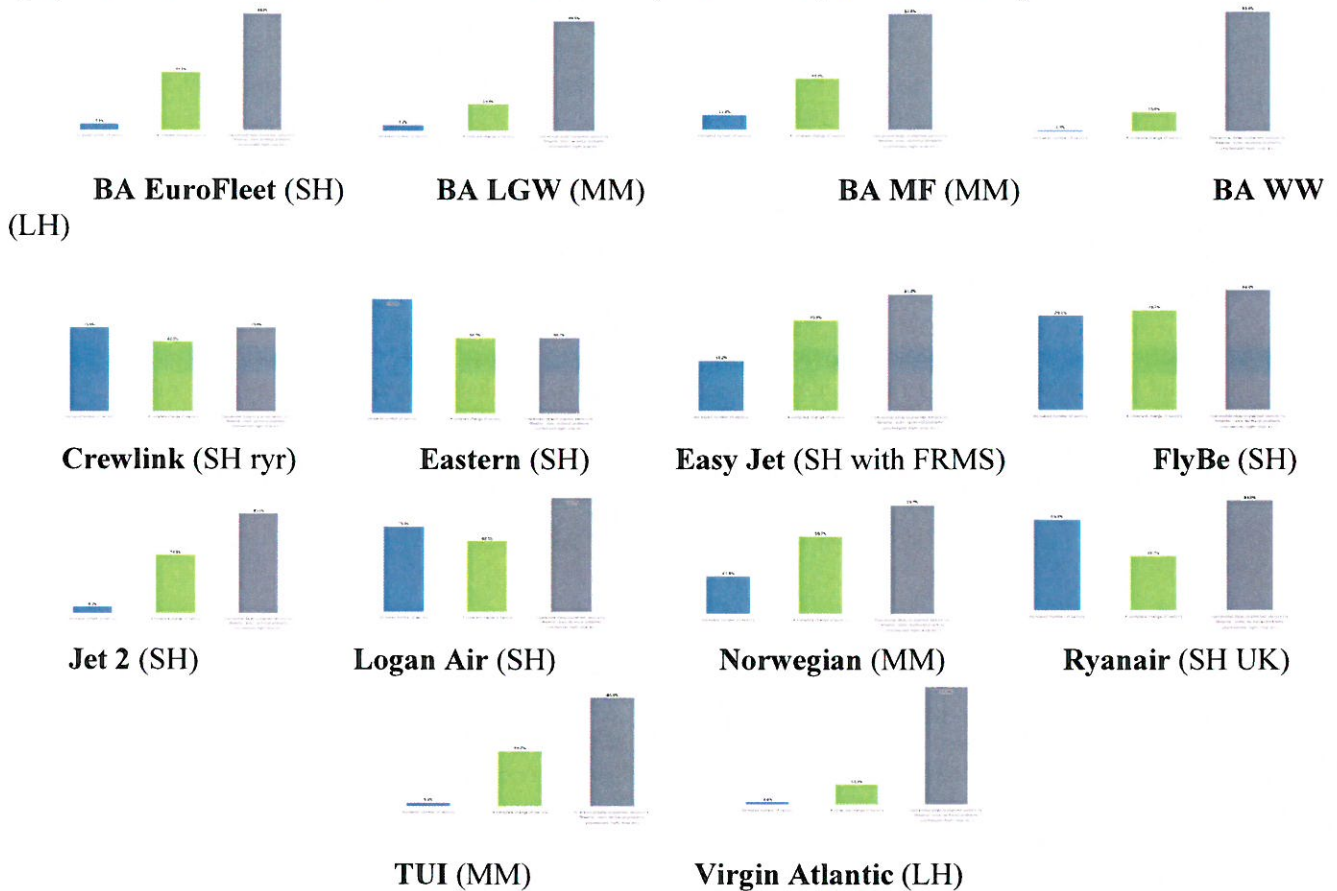
### Mixed Mode - 2583



## UNITE the UNION – Duty Changes on or after report – October 2019



### QC) For what reason have duties been extended (Airlines in alphabetical order)







## UNITE the UNION – Duty Changes on or after report – October 2019

### Summary

- Short haul aircrew are subject to the most roster changes.
- On average 82% of cabin crew believe that roster changes contribute to their fatigue levels.
- An overall average of 65% report changes on the day with all short haul carriers\* reporting between 70% to 95%.
- An increase in the number of sectors on the day are reported in Short haul operators at; 70%, 38%, 75%, 6%, 75% and 27%.
- A change of sectors on the day for all types of flying is reported at; 17%, 15%, 40%, 24%, 45%, 44%, 56%, 62%, 52%, 78%, 42%.
- Changes produce knock on effects to planned short haul rosters from 57% to 98%.
- How varied are these changes from the planned duty and rest periods, not only in length but where they vary with regards to the cabin crew members sleep / wake cycle – planned vs achieved rosters.
- How does EASA expect demonstrate compliance with the intent of ORO.FTL.110 a) if changes are permitted with the regularity we see?
- Does ORO.FTL.110 a) only prevent fatigue by the planning of the duty in advance i.e. a work of fiction?
- If the planned rest periods are effectively moved by the changes, how should this be monitored and managed to ensure compliance with the ORO.FTL.110 a)?
- Roster changes on the day that have an impact on forward rosters are significant. Does the monitoring of cumulative duty hours (weekly, monthly and annually), minimum rest periods and flight hours satisfy compliance to AMC1.ORO.FTL a) & j)?
- How are operators ensuring compliance with ORO.FTL.240 a) & b) in these last-minute changes to planned duties
- How can crew comply with ORO.FTL.115 a) and b) – and make optimum use of the opportunities and facilities for rest provided and plan and use their rest periods properly.
- ORO.FTL 120 b) 2) provides that; f) The operator should develop and keep current FRM documentation that describes and records: scheduled and actual flight times, duty periods and rest periods with deviations and reasons for deviations; and
- As duty changes are not explicitly provided for in FTL and due to the insignificant or drastic impact on the philosophy of FTL being maintained, irrespective of best practice, should duty changes be explicitly covered under ORO.FTL 120b) 2)?
- Are current rostering practices only compliant because they haven't been checked?

Within Short haul operations there are a variety of operating types – traditional charter carriers operating longer flights to the Med and North Africa. These operators (e.g. TUI) can often only operate 2 sectors within a Max FDP, therefore we see low increase in sectors on the day. Mixed mode fleets see more complete sector changes than an increase in sectors, this is possibly switching short haul sectors for long haul sectors.

A full and significantly more comprehensive break down of the results can be provided.

*\*apart from British Airways*

Comments; a selection from Aircrew partaking in the Survey;

1. Although Fatigue reporting has improved rosters are rarely changed and feedback provided is usually a justification of how it is legal.
2. Sometimes my roster which is issued does not reflect what I actually do in that month so It is impossible to plan as even days off change!!
3. XXX airport is not really useful in this topic, since crew have no priority lane to pass through passports control after flying and very often we need to wait lots of time for passengers with fast track, assistance and sometimes even normal passengers. It is really annoying, especially if you only get a bus every 60 minutes, that means that you are going to waste another hour of precious rest.
4. Three times in the last three months, short-haul duties have been replaced by long-haul duties. This has a significant impact on my rest schedule and results in increased tiredness on days off.
5. Changes are one of the biggest factor of my fatigue
6. In July, busy summer month, I had 9 different changes at maximum in a week so for 5 working days
7. XXX constantly change published rosters Which can have an affect on managing your daily
8. Report time delayed at less than 1 hour before it was due to start. Most crew would already be on the way to the airport. Delay of the report at short notice does not give crew extra rest.
9. Most duty time spent on board or in the crew room isn't reported. That affects us a lot. Sometimes waiting for assistance, ground staff, airport buses to get passengers to the terminal, having a debriefing take a long time and it is not always reported by flight crew or base supervisors.





## UNITE the UNION – Duty Changes on or after report – October 2019

10. Fatigue is real and present in my airline, especially when your duty is extended, often at incredibly short notice, ie you are met as you arrive on stand for what you thought was your final sector of the day, only to be TOLD that YOU MUST complete another 2 sectors. This not only increases fatigue, but also has dramatic negative effects on the pilots' quality of life.
  11. Usually can start day 1 and have all 5 duties changed for the whole week.
  12. Rosters are just awful at the moment. Constant changes. And everyone in my base is feeling the effect. Majority of crew are fatigued. It's hard to do your day to day job where you are absolutely shattered all the time. And when you never really know what you're doing because of the constant changes. And it's just not fair that we are getting ill all the time and are constantly tired, even on days off.
  13. XXX tell us not to fly if we are sick, apparently, we cannot be fatigued because we have the best roster in the industry with 3 days off 5 on. When we call in sick we are subjected to very strict meeting which involve crew being told off for being ill telling us it is unacceptable to be off. I am currently sick with a head cold and I cannot call in sick as I will be called to XXX for a 10-min meeting. This meeting costs me a day's work and is all day due to limited flights I have to pay for parking and meals whilst I'm waiting 9 hours in XXX for a 10-min meeting for no reason as I have followed procedure had a meeting in my home base but XXX don't believe us so they call us to XXX anyway.
  14. Changes to our roster, especially on the day is a major factor in disruption to our ability to plan not only our social lives regarding kids school runs/ childminding etc. but also our ability to plan our lives regarding adequate rest as we plan our lives around our roster which usually extends far in advance related to our published 4-week roster
  15. There was a contract pilot commuting from Italy to the UK. He landed on his last day in time to make a flight home but was informed he would have to operate another 2 sectors. He refused and the following week he was told his services were no longer required.
  16. Sometimes I feel it's easier just to do the trip rather than kick up a fuss. Often if you dispute it then they give you a bad trip to make you wish you had just left it.
  17. Constant changes to roster especially in the summer has a very big impact on rest and also on home life and lifestyle. Often get changes from lates to earlies or vice versa
  18. Roster changes have vast impacts on us as crew and on our ability to rest and prepare and near impossible to avoid fatigue given that we aren't able to plan our rest time appropriately.
  19. Last minute changes to roster often infringe on rostered rest periods. Changes from early reports to late reports, and vice versa often make it difficult to plan sleep periods. On the day disruption often results in a post duty period falling below minimum rest before next duty. This is regularly tackled by delaying the crew members report, however pressure is often felt to report prior to this time to keep the schedule on track.
  20. XXX frequently significantly underestimates the effect of roster changes on fatigue. Indeed, there is no provision for this in their FRMS system and reporting Fatigue for Duty for this reason (roster changes) is managed punitively. Roster changes happen far too often without reason - there's never any explanation or justification from crewing, adding to the frustration. FDPs are also commonly extended or changes are issued on the day (after the rest period immediately before the duty), meaning it is impossible to plan sufficient rest. There is no protection against changes in OMA or the FRMS manuals, which leads to massively disruptive rostering.
  21. I went over 60 hours yesterday in 7 days and flagged this up before I left and was told it was okay as I was at base.
  22. Changes are common and often, and mostly with no previous notification before reporting. I once reported for a there and back and was pulled out of the pre-flight safety briefing to operate a 4-day trip to XXX. I was not mentally prepared.
  23. My roster stability was only 55% in August. All XXX staff can see their roster stability score if you need to ask in future. 55% is extremely disrupted and this led to me having to take fatigue days.
  24. Have had a few incidences where I have received up to 12 changes in one block for no reason at all, and the start times can be fatiguing, just hadn't block were day 1 was a 10:35 report and my last day was 04:30 report time.
  25. Last week - I had short haul, easy flights with similar report times meaning I could keep a consistent circadian rhythm. I was changed to a XXX - extremely tiring and +7 with two days off into a XXX. 14 1/2hr flight and -4hrs. This was done last minute, ruining plans to visit the doctor and being told I'd have to call in sick if I wanted to keep
  26. Our days off often change too causing us to change plans we made for our selves and company is not friendly towards us refusing. We are often pushed to limits due to operating mixture of long and short haul. Changes we face completely change the routine of our lives.
  27. Roster changes are without any doubt fatiguing. EASA FTL's without any shadow of a doubt take no consideration for human factors. Since EASA FTL's have been enforced I have witnessed myself and others suffer from severe fatigue. EASA FTL'S are concerning for safety reasons.
  28. Sometimes we can have three roster changes in a day.
  29. Roster changes are perfectly fine if the duty ends as published with the same or additional days off. However when a roster change means disruption to the previously mentioned, we are then expected to report as per our next duty. Consideration to how the previous duty may have effected my ability to sleep is not shown. I therefore fine myself reporting tired.
  30. **Not exactly relevant but interesting;** It would seem that on a stand by, no matter what time your standby period is, you can be called out for any duty ie. if your sb is 0300-07.00 you may get a call at 06.50 to do a duty that checks in at 15.00 and that may not actually land until the following day. Regardless of the fact that you've been awake since 03.00. At XXX you can be on duty for 18hours from the start of a standby call out. You can then go over this time if your flight is delayed. It is very common to be awake for a 24 hour period including travel to and from the work place before getting some rest.
  31. Only days off are fixed. Everything else on the roster is subject to change. Evenings you plan to stay at home between short-haul duties can be changed to a long haul duty.
-





## UNITE the UNION – Duty Changes on or after report – October 2019

32. Roster changes are disruptive to lifestyle and my well being/tiredness physical and mental in general
  33. Roster disruption plays a huge part in my feeling of dissatisfaction with my job particularly this year. Whilst delays due to weather etc are understandable and unavoidable, delays due to lack of crew (e.g waiting for them to position from other bases ) is simply bad planning and one effect cost cutting. Roster changes are also frequent due to the practice of maximising duty hours and cutting minimum rest down as far as possible so that "minimum rest" is not regarded as the absolute minimum, but actually the blueprint for our working blocks. So then fatigue kicks in, exacerbating crew shortages, and so it spirals....
  34. Roster changes are becoming more the norm, rosters sometimes aren't worth the poet they're written on, it adds to stress and fatigue
  35. We need to stop roster changes . Our roster stability doesn't exist .
  36. XXX have a very, change anything as and when approach.
  37. At XXX is common practice to have transitions and changes to your published roster all the time. A massive contribution to long term fatigue.
  38. I recently was changed from a 11hr duty day along with the rest of my crew at report to do a 16.25hr duty changing from 1 sector to 2 sectors and only provided with the 1 crew meal still and this is not acceptable and the lack of care from the company with regards to this !
  39. Understandably operational reasons has a big impact on rosters. However it seems to be a lack of crew in bases that others have to cover is really unacceptable.
  40. I've just had a roster change due to another aircraft going tech and me being forced to cover crew who had gone out of hours. The change has meant my destination which was +3 hours time difference is now -8 hours. As crew, how can we prepare for this?
  41. There is no roster stability at all, I'm always getting last min changes that affect my whole week. There is no work life balance at all anymore
  42. We are getting multiple changes for one day at the minute sometimes earlies to lates back to earlies the. Lates again how can you organise your life with changes like that
  43. Some months I feel my roster is a worthless piece of paper as changes are so frequent. It is extremely hard to plan a work life balance when my roster can and does change trip to trip
  44. These days at XXX, I generally go to work not knowing when I will actually return home, whether it be that day or potentially 3/4 days later. This is very unsettling and effects my work/life balance.
  45. The airline manipulate the schedule agreements we have For example not rostering correct turn around times on AIMS system we always see us landing after we should have taken off for the next sector or a turnaround of 5 minutes which is obviously impossible Changing the block time of a flight to make it within limits, We see a block time of a flight for example 1hr 30minutes for CDG as per roster release change to 1hr 10mins during the actual duty, so flight crew are now 20 minutes within the schedule agreement thus not getting additional payment owed or unable to refuse the duty as the company manipulate the flight times
  46. Roster changes cause stress and fatigue. Our company claims that once on duty we are available up to maximum duty hours irrespective of the published roster.
  47. Roster disruption can often lead to a total remodelling of my roster with reduced rest. There is also a prevalence of rosters published with large portions rostered as XXX days which then change to duties at short notice leaving crew unable to plan rest.
  48. I am permanently exhausted because of extended duties. Especially out of XXX as it has one runaway and no matter what time of year it is there is ALWAYS long delays.
  49. Where do i start!!, roater changes.. if i go a week without a change its a cause for celebration, under crewed over worked and under payed dosnt quite cut it!!
  50. Constant changes to roster which is not acceptable because roster only comes out monthly. You can never plan anything apart from on days off, and are constantly reminded of this by crewing. This includes doctors appointments et. I'd you cannot book anything on an evening if an early in case you are changed even on the day and vice versa with lates
  51. Roster changes need to be monitored.
  52. As we have no formal definition of disruption, this term is used to manipulate our rosters and reduce rest multiple times a month, which impacts my rest enormously
  53. The roster changes are constant and this has an affect on home life too. Most weeks the whole week is changed
  54. My roster is published and managed to the limits including minimum rest and maximum hours. I have had to go part time to avoid fatigue and also to have a work life balance.
  55. Report time delayed at less then 1 hour before it was due to start. Most crew would already be on the way to the airport. Delay of the report at short notice does not give crew extra rest.
  56. Roster changes can not only affect future flying days but frequently result in reduced rest time between duties, making it harder to effectively manage rest
  57. Roster changes are not only frustrating but impact sleep patterns
  58. Roster changes have a detrimental effect on my fatigue levels and work life balance. I also believe that continual changes to rostered duties can impact on to on board safety.
  59. We only have 3 G (Guaranteed) days off in a month. We have plenty other days off but since they are not guaranteed, they are able to change them to a flight whenever they need to. I just think it's quite wrong that we only have those 3 days in a month that is really ours to control. And for the rest of the 27 or 28 days - they own us.
  60. It feels like we are on a constant standby. Our rosters hardly ever stay as published. We get constant changes even on our days off for our next duty. We get changed from a early week to lates, and the response we get is 'its Legal' We are constantly exhausted.
-





## UNITE the UNION – Duty Changes on or after report – October 2019

61. My roster is continually changed after production. I am 50% and work a 5 in and 9 off. By the time I have finished day 5 I am like a walking zombie. Crewing seem to think it's okay to continually change my roster as I am part time and so they seem to push you harder as the high hours is lost with my 9 days off. 6am starts, then 10am start, then back to a 4 sector 5.35am start. Finishing into rush hour traffic. Then another 6am start for 4 sectors and to finish off on a late and finally home at midnight. There's fatigue...!! Bumping into doors and not knowing what planet you are on. But it doesn't matter because I have 9 days off ...!!
  62. Our changes and length of duties are becoming more now than ever and causing anxiety and over tiredness and fatigue issues!..Plus although as being classed as legal, it often feels like we are being taken advantage of...and our Rosta no longer seems to have a fair mixture of duties and times!
  63. Lots of rosta changes this year Going from nights to earlies ????. When do you sleep ??? Standbys begin you then get called after the standby has finished !!!
  64. roster changes on the same day, impossible work/personal life balance..last minute layovers (changing my roster completely). Calls during rest downroute, constant reduced rest on layover not counting transport time.
  65. Under Irish AOC any set roster agreement seems non existent
  66. Roster changes are the norm at my airline and is probably the biggest factor in why I feel fatigued
  67. My roster is constantly changed after being published often adding an extra 4 hours to my planned roster
  68. Big contributing factor to fatigue when getting extra sectors or disruption to the roster especially on the day.
  69. Quite often I report for a duty and then get put on another duty which is longer and impacts on my planned roster and increases my fatigue levels. I have previously worked for other airlines where we were able to report if we felt fatigued due to roster disruption, however XXX don't acknowledge this and say that we should report being untested which implies it is down to us as individuals not getting enough rest and not the company at fault for all the changes we have to our roster.
  70. The company behave like you are their personal slaves, our rosters can be changed and when we question why the standard response is "its legal" no empathy for how hard the job is and the impact of multi sectors and having no personal life except for on days off. You cannot commit to anything during your rostered duties as the company just changes them and you have no options. I worked as part of the safety team, as cabin safety rep, at the meetings we had with management there was a complete lack of concern of the effects of fatigue, it was basically likened to " they are complaining again" with no understanding or care for crew.
  71. Company regularly using rules meant for extreme circumstances on a regular bases
  72. Fatigue is leading to many illnesses and many crew flying ill as XXX refuse to accept more than 3 illnesses in the whole time of service with them and with the poor sick pay no one can afford to call in sick , that extra stress is causing further physical and mental stress making us worse
  73. Sometimes weeks never go as planned which is understandable but have a block of 4 working days changed to longer duty's at very short notice in all 4 days lead me to be so fatigued I nearly crashed my car twice on the way to my second job.
  74. Constant roster changes do not allow for planning rest. Minimum rest may be achieved, but if this is hours outside that originally planned there is a know on effect
  75. Many a time they are changing early flights to lates.
-