

FC5093

Posted on 10.08.2022 by Steve Forward

Category: [Flight Crew \(Commercial\)](#)

Report Title Crews operating into UK extremely fatigued #2

Initial Report

Abridged (see also FC5090)

Pilots [at Airline] routinely fly over 1000hrs a year and fly up to 180 block hours a month. However, at the moment the flight time for 4-pilot augmented crew for a 13:30 hours flight is 07:30 for crew A and 06:00 for crew B. The latest change is that, in addition to time in 'Inflight rest' not counting, the time in the jump-seat during take-off and landing (1:30) also doesn't count. Similar rules apply to 3-pilot crew.

Comment

Same comment as FC5090

The essence of the issue is what portion of actual time in the aircraft is included in the airline's FTL/FDP calculations? The airline's ACN states that "*Operating hours logged in [company flight time recording system] towards Flight Time Limitations (FTL) ... are based on ... the entire time Block Time minus the time spent resting in an approved rest area.*" so any time resting in an approved rest area (i.e. not at the controls) appears not to be counted whereas the industry norm is that a rostered crew member is considered to be 'operating' if they carry out duties in an aircraft during a sector irrespective of their minute-by-minute actual activity in the aircraft. CHIRP sought clarification from the airline about FTL calculations but received only the statement above largely relating to the recording of logbook hours. Whilst logbook hours justifiably only take into account time spent at the controls, the whole portion of the flight time within a duty as an 'Operating Crew Member' should be used for the purposes of FTL calculations, including rest periods in flight.

The regulation of foreign airlines lies beyond the UK CAA's remit, but operations within UK airspace are conducted in accordance with protocols and responsibilities overseen by the Department for Transport (DfT), assisted by the CAA Air Safety Unit. Subsequent to receipt of this report and CHIRP's engagement with DfT, they have established an International Risk Working Group to review and prioritise issues relating to foreign airlines operating in UK airspace and say that this specific issue will be progressed within that structure.

Key Issues

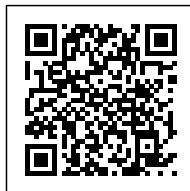
Associated Regulations

EASA [Regulation \(EU\) 965/2012 Annex III Part-ORO](#) ORO.FTL.105 Definitions (12) defines flight duty period (FDP) as: *"a period that commences when a crew member is required to report for duty, which includes a sector or a series of sectors, and finishes when the aircraft finally comes to rest and the engines are shut down, at the end of the last sector on which the crew member acts as an operating crew member"*.

EASA [GM1 ORO.FTL.105\(17\)](#) Definitions defines 'Operating Crew Member' as: *"A person on board an aircraft is either a crew member or a passenger. If a crew member is not a passenger on board an aircraft he/she should be considered as 'carrying out duties'. The crew member remains an operating crew member during in-flight rest. In-flight rest counts in full as FDP, and for the purpose of ORO.FTL.210 [Flight Times and Duty Periods]."*

EASA [Regulation \(EU\) 965/2012 Annex III Part-ORO](#) ORO.FTL.210 Flight Times and Duty Periods states that: *"...(b) The total flight time of the sectors on which an individual crew member is assigned as an operating crew member shall not exceed*

- (1) 100 hours of flight time in any 28 consecutive days;*
- (2) 900 hours of flight time in any calendar year; and*
- (3) 1000 hours of flight time in any 12 consecutive calendar months.*



There are no comments yet.