FC5215

Posted on 30.01.2023 by Steve Forward

Category: Flight Crew (Commercial)

Report Title Impact of ATC closures

Initial Report

The closures (by short-notice changeable NOTAM to reflect controller availability) at [UK Airport] ATC are having an impact on Flight Safety. Having landed late on a schedule into [Mediterranean Airport], the Crew were naturally feeling a little pressure to get the turn done with no wasted time, especially as a tight slot was initially set. The way [Mediterranean Airport] works does not make this easy at the best of times, and all Crew were busy. Meanwhile the Captain, who was PF on the way back to [UK Airport] spent at least 30 minutes on the telephone to Dispatch trying to work around the ATC closure at [UK Airport] which consisted of a fifteen minute period (but with buffers either side). Initially we were planning a high speed revision to the flight plan to get in before closure but we then ended up going for a slow flight plan to go the other side of this closure. This generated a terrible slot in [Mediterranean Airport] to fit into the departure pattern. Most distracting for the Captain who had plenty on his plate anyway.

This is the "Bread and Butter" of commercial aviation in the current climate. However, this is now the end of Summer, and I have been working around this additional workload for the whole season. Is it conceivable that no ATC staff are available to hire, even 'Locum'? All businesses are having recruitment issues currently, and airlines and airports are no exception but the consequent increase in Crew hours is causing Airlines more Crew problems as we burn additional hours waiting for their rest periods.

[Mediterranean Airport] is a difficult airport to work from, we had to plan and brief the Noise sensitive departure with an 'Emergency Turn'. We had to try to negotiate our preferred runway for departure, all while operating under the normal pressure of a CTOT. I had to really concentrate on keeping it all safe and measured. I am angry because it puts so much additional pressure on all our Crews, not just me on this occasion. It is the first item I look for when I am flying, as it can ruin your day so easily. I know from talking to others that they all feel the same. This should not be the case, and is not consistent with safe operation, and has been going on far too long.

In another experience of the situation, we were turned around in [Greek Airport] in good time and could have easily made an arrival into [Airport] by the planned closure (with 10 minutes of buffer which is not on the NOTAM). By the time I had telephoned everyone I thought could help, other restrictions occurred over Germany. We ended up having to depart for the other side of the rest

period. Over an hour of frustrating delay for Crew, passengers and [Greek Airport] who had to stay open to accommodate us waiting on an airfield extension. Whilst whiling away the time, I spoke to ATC in [UK Airport] who were very helpful, and explained that it takes six months to train an ATCO. So little hope for this season then! I cannot help but think that this is not the only solution to the problem. From a safety point of view, this whole situation of flight crews extending their duties (I personally went into discretion on this flight), is wholly unacceptable. Why should I go into discretion for an ATCO rest period when I am the one in charge of an entire aeroplane and passengers? Would it not be safer for them to go into discretion to allow safe arrival of the aircraft? This is madness, and has to stop before an accident happens. It may not even be as a direct consequence, but more subtle, as a secondary factor in another incident.

Comment

To some extent this report reflects the day-to-day challenges that need to be overcome by flight crew as part of operational resilience – although undesirable, flight crew operating into discretion is not a flight risk in itself provided the situation is suitably managed and conducted appropriately. That being said, when such incidents become a regular feature of short-haul operations then we should be conscious of the cumulative effects of this and the many other challenges at the moment; it is all too easy to look at things in isolation and dismiss them rather than consider them in a holistic manner to understand the combined effect on overall performance of a number of perhaps seemingly minor issues.

This report is symptomatic of the overall aviation system not working in a symbiotic manner due to pressures in some areas causing problems in others. The solution is of course to resource all areas to the required scale in the long-term, and it is accepted that this is the goal of all organisations as they recover from the pandemic hiatus, but it's easier said than done when training pipelines are protracted and there is a global shortage of ATCOs. Training and local knowledge requirements for ATCOs are specific to each location and so the use of *ad hoc* 'Locums' is not an option in the same way that it would not be reasonable for airlines to try to make use of pilots trained on other different aircraft types to fill flight crew gaps in a particular fleet.

There is scope for ATCOs to exceed their hours as a form of 'discretion' but every such exceedance must be individually reported by MOR and this may be a barrier to dynamic tasking at regional airports. SRATCOH itself has been superseded by Annex IV to [UK Reg (EU) No. 2017/373 'Part-ATS'](), with specific requirements being detailed in [UK Reg (EU) No 2017/373 AMC1 ATS.OR.320(a)(3), a(4), a(5) & a(8) Air traffic controllers' rostering system(s)]() which, in consolidated form, state that:

MAXIMUM TIME PROVIDING AIR TRAFFIC CONTROL SERVICE WITHOUT BREAKS

Together, the following rostering principles are means by which an air traffic control service provider can design a rostering system(s) which manages the risks of occupational fatigue of air traffic controllers:

(a) The maximum time providing ATC service without a break should not exceed 2 hours.

(b) Notwithstanding point (a), at units where workload for any part of the day is judged to be low and the activity is spasmodic rather than continuous, the maximum time providing ATC service without a break, at these times, should not exceed 4 hours.

(c) Notwithstanding points (a) and (b), for a controller on an 'early start duty' (see AMC1 .45 Duty period) commencing **before** 0600, **all** operational duty periods shall be limited to 1.5 hours. For a controller on an 'early start duty' commencing **at or after 0600**, the **first** operational duty period shall be limited to 1.5 hours.

RATIO OF DUTY PERIODS TO BREAKS WHEN PROVIDING ATC SERVICE

The rostering principle below is a means by which an air traffic control service provider can design a rostering system(s) which manages the risks of occupational fatigue of air traffic controllers:

The ratio of operational duty periods to breaks should be 1:4; for example, 15 minutes break for 1 hour operational duty period.

MINIMUM REST PERIODS

Together, the following rostering principles are means by which an air traffic control service provider can design a rostering system(s) which manages the risks of occupational fatigue of air traffic controllers:

(a) Notwithstanding AMC1.ATS.OR.320(a)(4), where the maximum time providing ATC service without a break is 2 hours in accordance with point (a) of AMC1 ATS.OR.320(a)(3), such periods should not exceed a period of 2 hours without there being taken during, or at the end of, that period a break or breaks totalling not less than 30 minutes during which period a controller does not exercise the privileges of their licence.

(b) Notwithstanding AMC1.ATS.OR.320(a)(4), where the maximum time providing ATC service without a break is greater than 2 hours in accordance with point (b) of AMC1 ATS.OR.320(a)(3), a break, or breaks should be taken pro-rata, during, or at the end of, that period of operational duty (for example, 45 minutes after 3 hours or 60 minutes after 4 hours) during which period a controller does not exercise the privileges of their licence.

The duty and rest measures above were originally based on historic shift patterns and old fashioned cathode-screen controller environments; given the modern environment and management processes, it may be that at regional airports controllers could do more time on duty depending on traffic levels and so there may be value in reviewing the legacy requirements for mandated breaks. That being said, just because a console is quiet with no aircraft under control

doesn't mean that ATCOs aren't working at other activities such as coordinating traffic with other sectors etc and so duty times also have to account for that. CHIRP will engage with the CAA to investigate these aspects and explore whether a more pragmatic and flexible approach is possible. Similarly, the ability for airports to deviate more easily from their UTP to address day-to-day requirements would also be useful rather than require a rigid approach to training activities and when they are scheduled.