

Position Paper

EASA FLIGHT AND DUTY TIME LIMITATIONS (FTL) (February 2011)

Background

In the field of commercial air transportation, common EU rules were already established through EU-OPS (including Subpart Q for FTL). As part of its extended scope, the European Aviation Safety Agency (EASA) is preparing the future EASA safety rules on airline operations (EASA OPS), which will replace EU-OPS by 8th April 2012.

The EASA FTL Rulemaking Group (OPS.055), which consisted of representatives from the EU Commission, EASA, National Aviation Authorities, trade unions and airlines/aircraft operators, has made an in-depth review of all relevant scientific studies and applicable requirements. It has completed its work in November 2010.

Based on the SAFE model developed by Qinetiq/UK-CAA and other relevant studies (such as the French STARE study on reduced rest), it has been confirmed that the existing Subpart Q of EU-OPS is safe. Subpart Q will therefore be maintained and complemented with a harmonized framework at EU level to implement those issues currently regulated at national level (augmented crew, time-zone crossings, standby duty, reduced rest and split duty). The EASA work has also confirmed that there is no justification to implement the recommendations of the so-called scientific and medical evaluation of Subpart Q of EU-OPS (Moebus Report). The European Transport Safety Council (ETSC) had already earlier highlighted the lacking scientific basis for the Moebus Report (31st March 2009)

Based on this work, EASA has issued on 20th December 2010 its formal rulemaking proposal Notice of Proposed Amendment (NPA) 2010-14, on which formal comments are due by 20th March 2011. An EASA final Opinion is expected later this year.

AEA position:

The AEA generally speaking welcomes EASA NPA 2010-14 and the work done by the EASA OPS.055 (FTL) Rulemaking Group which confirmed that Subpart Q is safe. The AEA still has a few minor concerns left (related to multiple airports as single home-base, standby at home and some aspects of in-flight rest for certain flights) and urges EASA to accommodate those concerns during the NPA process.

The AEA urges EASA to build on the safety-driven work of the OPS 0.55 working group during the comment-response process and to resist attempts to dilute the proposals for a safe FTL system for Europe.

Building on EASA NPA 2010-14, would ensure safety while it would provide for legal stability. It would build on the huge efforts to implement Subpart Q whereas it would cater for the need for further harmonization at EU level through a harmonized implementation of the EU-OPS blank spots currently dealt through national legislation.

For more info, please contact: Vincent De Vroey, General Manager Technical & Operations, Email: vincent.de.vroey@aea.be