

## **Fatigue Management Working Group Holds First Meeting – Operator-Member Participation Required**

The first meeting of the Fatigue Management Working Group took place on August 25 in Ottawa, where members of the Working Group were oriented to the regulatory environment of other jurisdictions, including the ICAO proposed Fatigue Risk Management System (FRMS) SARPs. The information will serve as a backdrop to the Canadian deliberations. The airlines and their flight crew unions were well represented. HAC was the only organization in attendance representing the interests of the helicopter community.

### [Read the Terms of Reference](#)

HAC members will agree that a practical and safe framework for managing flight crew fatigue is absolutely essential, particularly given the seasonal nature of remote Canadian helicopter operations, and extended daylight hours in the Canadian north.

Naturally the Working Group will be examining the terms of our current prescriptive Flight Time & Flight Duty Time Regulations, but the group will also be examining a prospective requirement for Canadian operators to implement a FRMS. How an FRMS will dovetail with new prescriptive new rules is very much an open question, and the issue will be debated by the members of the Working Group.

So, “What is an FRMS, anyway?” you ask? Transport Canada has published a variety of reference material on this subject – [Read More](#).

HAC’s position on this subject to the Director General Transport Canada was set out in a letter dated July 15 2010 was as follows:

“If Transport Canada is committed to the concept of partnering with industry as they accept more responsibility for their own safety performance, then the existing CARAC model needs to evolve to reflect a greater role for industry to identify and collaborate with the department to develop new regulations. What’s more, as industry accepts *more* responsibility for identifying its own safety issues going forward, Transport Canada will be *less* capable of identifying and prioritizing issues for regulatory action. There should be a role for the helicopter industry to invite participation from Transport Canada to help *us* direct the evolution of our regulatory framework to reflect issues that

have been identified by industry.”...

HAC went on to say, “Transport Canada’s priorities developed in isolation will reflect safety priorities that will be increasingly disconnected from the operational safety realities of our industry. The most recent example of this was the CARAC discussion of Flight Time and Flight Duty Time Limits. I know that both industry and government will both invest thousands of hours of time in the context of the Working Group’s deliberations on this subject, in an environment where the current F&DT rules have been largely working well for the helicopter community. Admittedly we could benefit from a consideration of the latest science of Fatigue Risk Management, but a review of the existing F&DT regulations is still *not* an issue that would have figured prominently on HAC’s list of Top Issues with safety-enhancing potential. As long as Transport Canada insists upon developing its own regulatory priorities in an environment where it is increasingly disconnected from the operational realities of the helicopter community, the regulations that flow from that process will reflect a distorted response to the real safety issues facing the helicopter industry.”...

Read the full text of the July 15 2010 letter to Transport Canada’s Director General in the **HAC’s IFR Committee Active in H1 Helipport & NVIS Discussions** article, below.

The Fatigue Management Working Group has set an aggressive timetable to meet its deadline of one year to produce a set of recommendations. It will be essential to have helicopter operator-representation to the Working Group. HAC would like to have two operator-representatives as “technical advisors” during the Working Group’s deliberations, and HAC would like to invite interested members to contact Fred Jones at [fred.jones@h-a-c.ca](mailto:fred.jones@h-a-c.ca).