

Flight and Duty Time Working Group Concludes Deliberations

For the last 17 months, for about four days each month, HAC and some of its members have been engaged in discussions with Transport Canada and other industry stakeholders over the fatigue management regulations in Canada. These discussions have involved HAC, ATAC, CBAA, MAC, ALPA, ACPA, NACC and NATA.

Here are some of the major items that that HAC is discussing with Transport Canada:

1. Liberalization of the split-duty provisions in the CARs. There is strong support in the science for the principle that minute-for-minute extensions to the Duty Day should be provided for sleep during the day in any type of operation.
2. Continuation of the “zeroing” provisions in the CARs for five consecutive days-off. There is strong support in the science for the recuperative effect of five days free from duty.
3. Support for “Calendar Days-off” rather than 24 consecutive hours free from duty.
4. Clarification that travel days (even when not flying) are not days free from duty.
5. An extension to the minimum rest period of two hours when 24 hours of flight time has been accumulated in any three days or less.
6. The ability of flight crews to work multiple consecutive 14-hour duty-days if there is no erosion of the minimum rest, and without any attendant erosion of performance. The question is, how long could a pilot reasonably be expected to work consecutive 14-hour days? Seven days? Thirty days? Thirty-five days?
7. A movement away from 42 consecutive day tours, to 30-day tours with the opportunity to go as high as 35 days, if the tour is preceded by five days off and followed by seven days off.
8. The airline segment of the industry will *certainly* adopt a cumulative DUTY HOUR regime, with limits in-the-order-of 60 to 65 Duty Hours in any seven consecutive day period and 190-200 hours in any 28-day period. HAC has steadfastly rejected the application of cumulative duty time in the helicopter community.

9. Ten hours *minimum* opportunity for rest to contemplate meals, and personal hygiene, but excluding travel time to/from suitable accommodation, away from home.
10. Should “Weather Days” be considered days-off?
11. HAC has argued for the status quo on the current cumulative flight time limits except a reduction in the annual limit from 1200 to 1000 hours. We have argued that flight time is a better measure of fatigue than cumulative duty hours.
12. Extensions to the Duty Day for time spent on standby in suitable accommodation, up to 18 hours.
13. The maximum length of the Duty Day (14 or 13 hours). HAC has argued in favour of a *maximum* 14-hour Duty Day.
14. The fatiguing effect of Duty Days which start or finish between the hours of 2am and 6am local time (the Window of Circadian Low).
15. The airline segment of the industry will *certainly* adopt sector-based limitations. That is, the greater number of take-offs and landings, the shorter the Duty Day. There will be pressure on IFR helicopter operators to adopt similar limitations. VFR helicopter operators will be excluded from any sector-based limitation.

While HAC has been accompanied by operator-members at each of the Working Group meetings, HAC would welcome your views on the foregoing in preparation for a formal submission that we will make before the end of February 2012. Send your comments to fred.jones@h-a-c.ca.

The Working Group has concluded its deliberations and the Working Group Leaders will be drafting their recommendations in the coming three or four months. It will be over to the CARAC process after that with a view to in-force regulations in the coming three or four years.