

## **Flight & Duty Time Working Group in Difficult Territory**

In the Fall of last year Transport Canada convened a Working Group to examine the existing prescriptive Flight and Duty Time Limitations with a view to determining if and how they should be revised. The group has met four times and has been considering a variety of factors including the latest scientific research on fatigue; the possible use or integration of Fatigue Risk Management System principles; and the evolution of fatigue management regulations in other jurisdictions and in the international community.

HAC has been represented on the Working Group since its inception defending the interests of the Canadian helicopter industry on this important issue. Also represented are the airlines and the airline pilot's unions and a variety of other associations from across Canada. The first few meetings focused primarily on a review of the latest scientific and foreign regulatory developments since the last time Transport Canada held a Working Group on this subject about eight years ago. Working Group deliberations on fatigue were a painful process then, and they are still painful.

Canadian helicopter operators, owing to the remote nature of their operations and their dependence on a relatively short summer season are particularly sensitive to any restrictions on their ability to fully utilize their crews and aircraft. Remote areas present special challenges where crew changes are required. Northern operators who experience even more pressure to produce before the daylight gets short (or disappears) are even more exposed. At the same time, the helicopter community is acutely aware of the dangers of fatigue for flight crews, particularly in single pilot operations. The Working Group has declared its intention to rely principally on science to guide their deliberations, since otherwise the discussion can quickly descend in to a debate based on anecdotal experience and war stories. This can be counterproductive and war stories are difficult to defend as the basis for any regulatory structure particularly in an regulatory environment that is *supposed* to be driven by hard data and risk assessments.

Some of the issues which have been raised for discussion by the unions (to name only a few), which could have an impact on helicopter operations in Canada include:

- Weekly or Monthly Duty Time Limits
- Duty Day start-time as the basis for differential daily Duty Time Limits
- The concept of 'Required Rest Prior to Duty'
- Any scientific support for the extended Flight Time limits for CAR 702, 703 and all non-scheduled helicopter operators set out in 720.15
- Sector limits
- The definition of "Suitable Accommodation"

While discussions so far have taken place in plenary with the airlines, HAC has been insisting that the discussions which only affect helicopter operations should ONLY take place among Working Group members that represent stakeholders in the helicopter industry, rather than have the helicopter fatigue-related regulatory infrastructure influenced by airline-type operational and labour-related circumstances.

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