



**EASA**  
European Aviation Safety Agency

# Overview of EU Requirements on ATCO Fatigue management

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# Regulatory background

Regulation 216/2008, Annex Vb, Section 5(b)(i):

*ATC service provision shall not be undertaken unless the following conditions are met:*

*(i) the **prevention of fatigue of personnel providing an ATC service shall be managed through a rostering system**. Such a rostering system needs to address duty periods, duty time and adapted rest periods. Limitations established within the rostering system shall take into account relevant factors contributing to fatigue such as, in particular, sleep deprivation, disruption of circadian cycles, night hours, cumulative duty time for given periods of time and also the sharing of allocated tasks between personnel.*

**EASA required to develop regulatory measures to implement this Essential Requirement**

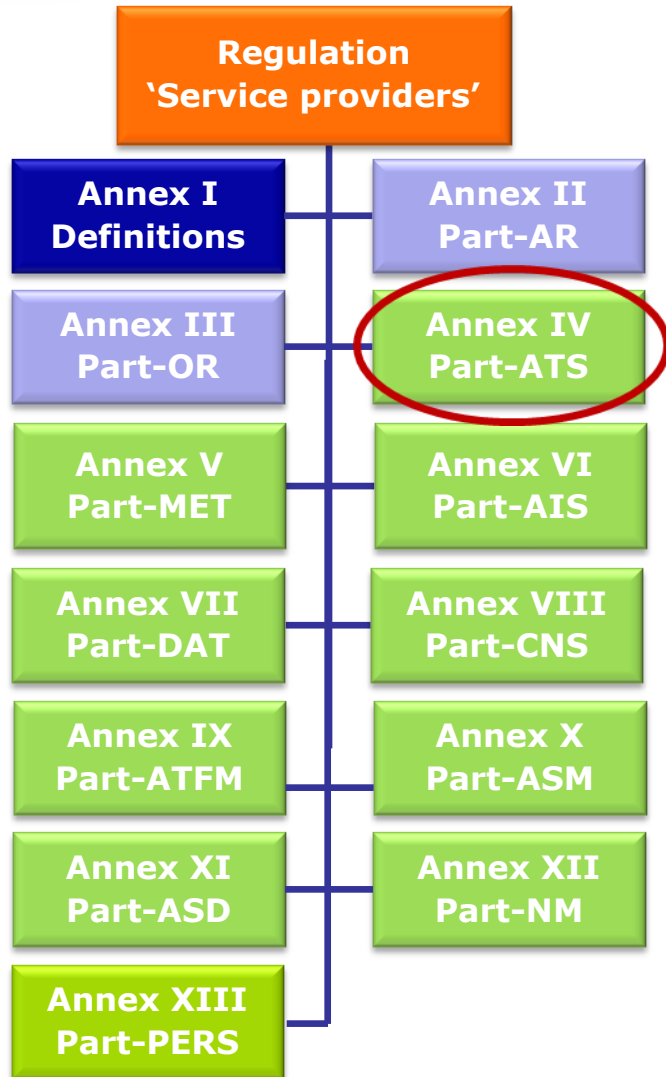


# Regulatory process – RMT.0148 WG06

- **RMT.0148 – Working Group 06 ‘Human Factors’ as of October 2010**
- **Group Composition: EASA, ANSPs, NAAs, Unions, IFATCA, EUROCONTROL – Primarily Members with Human Factor expertise**
- **Proposal consulted in May 2013 with NPA 2013-08**
- **Opinion No 03/2014 issued in December 2014**
- **Successive thematic meetings held to fine-tune AMC/GM in accordance with the progress of the Comitology process**
- **IRs published on 08 March 2017 within Regulation 2017/373**
- **Associated AMC/GM published within EASA ED Decision 2017/001/R**
- **Applicability : 02 January 2020**



# ATM/ANS CRs – Regulation 2017/373



## ATCO Fatigue management requirements

Annex I 'Part-DEFINITIONS' includes relevant definitions

Annex IV 'Part-ATS', Subpart A, Section 3

Includes Organisation Requirements concerning:

- the prevention and mitigation of the risk that ATCOs provide ATC service provision under problematic use of psychoactive substances;
- ATCOs' stress and critical incident stress management;
- ATCOs' fatigue management, including rostering systems



# Definition of 'Fatigue'

- ***'fatigue' means a physiological state of reduced mental or physical performance capability resulting from sleep loss or extended wakefulness, circadian phase or workload (mental or physical activity, or both) that can impair an individual's alertness and ability to safely perform his/her tasks***
- GM1 ATS.OR.315 indicates Chapter 2 of the ICAO Doc 9966 'Manual for the Oversight of Fatigue Management Approaches' as a source for scientific information on fatigue and on its effects on safety-relevant aviation professionals



# ATS.OR.315 – Fatigue

- ATCO fatigue management to be ensured i.a.w. the SMS framework of the ATS provider
- Emphasis is put on the obligation for the ATS provider to:
  - develop and maintain a **policy** for the management of ATCOs' fatigue;
  - provide ATCOs with **information programmes** on the prevention of fatigue, complementing human factors training provided in the context of unit and continuation training as defined in Regulation (EU) 2015/340.
- GM1 ATS.OR.315(b): information programmes to raise ATCOs' awareness on fatigue and its effects on individuals and on operations. May consist of lectures, leaflets, posters, CDs, etc.



# AMC1 ATS.OR.315(a) Fatigue management policy

- The policy addresses in particular:
  - The organisational commitment and the individual and collective responsibilities
  - The allocation of appropriate resources
  - The commitment to a continuous improvement of the existing procedures
  
- In accordance with the policy, principles and procedures for:
  - Fatigue reporting (e.g. taxonomy for fatigue);
  - Consideration of fatigue in the context of occurrence investigation and analysis activities (to determine causes of occurrences and to learn and improve fatigue management existing arrangements);
  - Identification and management of the effect of fatigue on the safety of operations (e.g. periodical fatigue survey, data analysis, training for managers and staff involved in fatigue/rosters management, system support for rosters management and monitoring)



# ATS.OR.320 ATCOs rostering system (1)

- The ATS provider shall develop, implement and monitor a rostering system and specify:
  - maximum consecutive working days with duty;
  - maximum hours per duty period;
  - maximum time providing air traffic control service without breaks;
  - the ratio of duty periods to breaks when providing air traffic control service;
  - minimum rest periods;
  - maximum consecutive duty periods encroaching the night time, if applicable, depending upon the operating hours of the air traffic control unit concerned;
  - minimum rest period after a duty period encroaching the night time;
  - minimum number of rest periods within a roster cycle
  
- Consultation with ATCOs or their representatives is required





# ATS.OR.320 ATCOs rostering system (2)

## ➤ Definitions:

- **‘rostering system’** means the structure of duty and rest periods of air traffic controllers in accordance with legal and operational requirements;
  - **‘break’** means a period of time within the duty period when an air traffic controller is not required to perform duties, for recuperation purposes;
  - **‘duty’** means any task that an air traffic controller is required to perform by the air traffic control service provider;
  - **‘duty period’** means a period which starts when an air traffic controller is required by the air traffic control service provider to report for or be available for or to commence duty and ends when the air traffic controller is free from duty;
  - **‘rest period’** means a continuous and defined period of time, subsequent to and/or prior to duty, during which an air traffic controller is free of all duties
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- **AMC1 ATS.OR.320(a)(6);(7):** Night time should be considered as the time between midnight and 05.59
  - **GM1 ATS.OR.320(a):** Selection and revision of rostering system based upon scientific principles, data gathered, best practices



# EU vs ICAO requirements

- Amendment 50-B to ICAO Annex 11 applicable as of November 2020
- Introduces requirements for ATCO fatigue management, including:
  - Prescriptive limitations for rostering systems
  - as total or partial alternative, a FRSM approach
  - Doc 9966 Manual for the Oversight of Fatigue Management Approaches
- EASA RMT.0486 'Alignment with ICAO ATCO fatigue management provisions'
  - To consider introducing FRMS requirements
  - Prescriptive approach already covered
  - RMT planned to be initiated in Q4 2019



# OPINION 03/2018 – PART-ATS

- Published on **22 May 2018** - Resulting from **RMT.0464** activities
- Includes **technical** and **organisational requirements** for the provision of **ATS**
- Mainly based on the transposition of ICAO provisions
- Amends **Annex I & IV** of **Regulation 2017/373** and **SERA**
- Submitted to Comitology (EASA Committee)
- Available at:

<https://www.easa.europa.eu/document-library/opinions/opinion-032016-0>



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**Any Questions?**

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