

**AEA, ELFAA, ERA and IACA joint position  
on FTL flight time limitations  
(EASA Rulemaking task OPS.055)**

1. **EU-OPS Sub Part Q** in its current form, complete with all existing definitions, limits and delegated National variants is, and **must remain**, available to all European airlines as an acceptable FTL system.
2. **FRMS systems are already in place** as part of the Safety Management System and are used by airlines to review the effectiveness of FTL systems, propose changes and support variations to EU-OPS Sub Part Q guided by operational experience and scientific study. Further guidance on FRMS will be provided by ICAO, FRMS does not need additional prescriptive regulation by EASA.
3. All EU airlines are agreed on the above points and **cannot accept any changes to EU-OPS Sub Part Q** which is already in operation, state-of-the-art, demonstrably safe, and more comprehensive than foreign FTL schemes.

EASA is a safety regulator and not a social mediator. FTL is an established safety system and not a social tool.

European airlines unanimously call on EASA to confirm that above agreed principles will be implemented in the interest of European air safety, uncontaminated by social agendas.

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