



ECA

European Cockpit Association

EP Transport Committee Hearing on FTL

18 June 2013

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European Cockpit Association

- Representative voice of Europe's pilots
- Since 1991: *'Piloting Safety'*
- and involved in the FTL debate



Thank you for letting us explain our approach
& safety concerns...

from an **operational pilot's** perspective



We need your help

- YES: harmonising to a high standard of best practice
- BUT:
 - > this proposal is **not** that required high standard
 - > it **ignores** much of established **science**
 - > *and* **Parliament's** instruction to use it
- If rules breach science, how can they be 'safe'?

Without EP's political direction & leadership
=> path of least resistance & commercial
expedience



Fatigue science sidelined?

- EASA's own scientific reports not followed
 - > First report set aside, next 3 largely ignored
- Now **ETSC says proposal wrong** too
- Time after time scientists clearly state:
 - > Protect from multiple duties that disrupt sleep
 - > Protect multiple flights in same duty
 - > Scientific evidence can extend duties with in-flight rest, not convenient round numbers
 - > **Limit night flights to 10 hours**, not 11 or 12:30





Flying
through
the Night ...

... for up
to **12h30**

Flying through the Night

From the ETSC:

“Several scientific reports commissioned by EASA over the past years concluded that “FDPs for minimum crew should not exceed 10 hours overnight”

10 hrs overnight - the limit of safe operation

- > Demonstrated across industry, not just aviation
- > Doesn't stop flights – just adds relief crew to go >10hrs
- > EASA informed by every study it ordered, but ignores
- > Unless EP demands its mandate must be followed?



Standby – time spent ‘on call’

- Proposals almost unusably complex
- Require crew to land plane after a working day of up to **22 hours**
- Crew therefore propose a simple, common-sense and operationally flexible solution:

Cap time on Standby + Flight Duty to 18 hrs

- How can we safely ask crew to land after more than this?



The right to choose to be safer

- EASA seeks strict harmonisation
- Some States forced to operate less safely
- Today: States have a right to choose a higher safety level if they want

Without a **binding article**
that choice is removed



Conclusion

- **Follow science**
 - > **Proposal not fit for purpose** without following overwhelming body of scientific & medical evidence
 - > **Protect multiple early starts** & multiple flights in 1 duty
 - > **Cap of 18 hrs** at end of standby + flight duty time
 - > **Limit night flights** to 10 hours
- **Allow MS to choose safer provisions**
 - > Needs **unambiguous** wording in **binding article**
- **Won't happen without EP leadership**

SAFETY

FIRST

Safe & Science-based FTL Rules

[www.eurocockpit.be /pages/why-flight-time-limitations](http://www.eurocockpit.be/pages/why-flight-time-limitations)



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