

Flight Safety – EASA Not Yet on Track

19 March was the deadline for stakeholders from across Europe to submit comments on EASA's latest proposal for future EU pilot fatigue rules. About 200 stakeholders – including ECA and its Member Associations – made use of this opportunity. The challenge for the Agency is now to do what it avoided doing in its latest draft: to comply with its own legal mandate by firmly basing its rules on medical and scientific evidence. Having solicited three independent scientific experts, EASA knows very well that its proposal still goes against scientific evidence on a number of key points. The dilemma is that aligning the rules with what science shows to be safe would put the Agency on a collision course with Europe's powerful airline lobby.

This dilemma is most obvious when looking at three examples, where the airlines claim scientifically-based limits would raise their costs, whereas EASA's proposal would allow pilots to fly dangerously tired.

The first one is night flights, a critical period for pilot fatigue. Based on decades of research, each of the three scientific reports, concludes that flying at night should be limited to 10 hours to prevent critical levels of fatigue and hence potential safety risks. Nonetheless, the Agency opted for 11 hours – fully in line with the airlines' requests.

The second example regards standby, where pilots and cabin crew must stay available for a flight when called by their airline. Standby is a vital element for the airlines to remain flexible. However, EASA's proposal allows a pilot to land an aircraft after 20 hours of duty and after having been awake for up to 22 hours. How could this be considered reasonable and safe?

The third example concerns long work days with multiple take-offs. Science shows fatigue increases with the length of the working day and with workload, such as multiple take-offs and landings. The three scientists therefore conclude that the total daily flight duty time must be reduced as of the 2nd take-off. But EASA requires this only as of the 3rd one – in line with the airlines' requests.

Beyond these clear examples where EASA disregards scientific recommendations, another basic principle has not been respected: the 'precautionary principle'. According to it, whenever scientific evidence is insufficient or inconclusive, and where there is a risk of negative effects, such as on passenger safety, a cautious approach should be taken by choosing the safest option. And here too, EASA has not followed this basic EU principle.

Therefore, if EASA does not change its proposal, a simple question will arise: who takes the responsibility when a fatigue-related accident occurs? Is it EASA who knowingly submitted to the Commission, EU Member States and



Nico Voorbach, ECA President

Preparing for the future

Last month was the time where we could post our comments to the revised EASA proposal for future rules on Flight Time Limitations, as you can read in this Cockpit News. Although some welcomed changes were made compared to the first draft Dec. 2010, we still consider this proposal as potentially decreasing aviation safety for many of Europe's passengers. This is clearly not acceptable. The European Region should be an example to the world that high safety standards are a 'must' and that we do not compromise on safety. As you can read several proposals are clearly in contradiction with scientific evidence provided by experts hired by EASA itself.

For this reason we will continue our fight against this insufficient proposal and we will inform you in due course about the actions we will undertake. Our dedicated website www.dead-tired.eu will be frequently updated. Please subscribe to our Dead-Tired newsletter so you will be informed as soon as there is news – and do sign the online petition for safe EU pilot fatigue rules.

We also launched an online computer game on pilot fatigue, which is now available on the website. This game is a simple way to show you that long flight duties and insufficient rest periods make it more difficult to fly safely. You have to pilot your aircraft between positive rest points and

the European Parliament a proposal that deviates from science and disregards the precautionary principle? Or is it the EU Member States who at the end of this year will have to approve the new rules?

Last month, EU Transport Ministers informally discussed the EASA rules. Several Ministers expressed their concern about the fact that pilot fatigue is a reality already today in Europe's cockpits, and that EASA must take due account of scientific knowledge. But, there are still EU governments who have not yet woken up to the real safety risks of dead tired pilots. Nor have they woken up to the fact that, ultimately, the fingers will be pointed at them if they failed to take their responsibility of providing Europe's travelling public with safe, science-based fatigue rules.

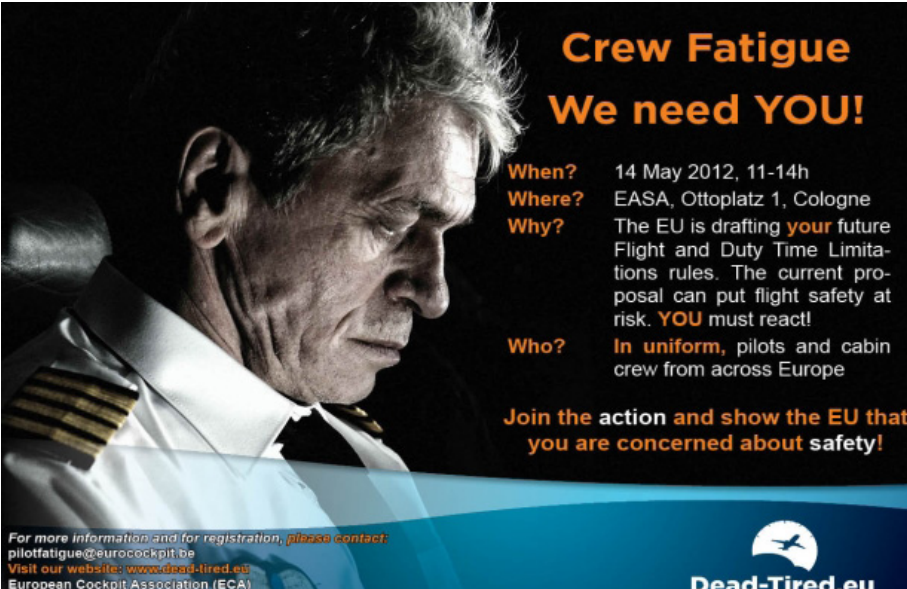
News Flash

Try out our new campaign video game and test your flying skills when fatigued. Go to <http://www.dead-tired.eu/videos/video-game>.

Join the Campaign! 14 May 2012, Cologne - Safe Crew Fatigue Rules Now!

The European Aviation Safety Agency (EASA) is in the process of drafting the future rules that will regulate future flight and duty time limitations. They released a revised proposal on 18 January, which is not acceptable as it can put flight safety at risk. Although an improvement compared to the first proposal of Dec 2010, this text still disregards decades of scientific evidence and does not take into account many of the scientists' recommendations.

For more information and for registration, please contact:
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www.dead-tired.eu




**Crew Fatigue
We need YOU!**

When? 14 May 2012, 11-14h
Where? EASA, Ottoplatz 1, Cologne
Why? The EU is drafting **your** future Flight and Duty Time Limitations rules. The current proposal can put flight safety at risk. **YOU** must react!
Who? **In uniform**, pilots and cabin crew from across Europe

Join the action and show the EU that you are concerned about safety!

For more information and for registration, please contact:
pilotfatigue@eurocockpit.be
Visit our website: www.dead-tired.eu
European Cockpit Association (ECA)


Dead-Tired.eu

negative fatigue influences. We hope you will enjoy this game and wish you safe and fully alert flights!

Last month, we discussed the quest of Ryanair pilots to get organised as a professional pilot body. I personally met several Ryanair pilots to discuss their wishes and it is good to see that – beyond having aviation safety in their blood – they want to improve their professional performance by working together with the management as is common practice in almost every airline in Europe. Captain Don Wykoff, President of IFALPA, sent a letter of support to the Ryanair pilots to encourage them in their efforts. He also states the importance of a coordinated professional pilot body at international and national levels.

Let me conclude with the hope that the European Aviation Safety Agency, the European Commission, the European Parliament, the Governments of all EU Member States and the European Airlines will stand together and opt for safe European Aviation Legislation – in the interest of Europe's travelling public.



The European Cockpit Association is the representative body of European Pilots' Associations. Based in Brussels, ECA represents over 38.000 pilots from across Europe.

For more information and to subscribe to our monthly online newsletter: www.eurocockpit.be

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