



The Focus of IOSA Auditors when examining Fatigue Management FDTL

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The perspective from IOSA

- As the global association of airlines, IATA encounters the majority of pilots in the world that possibly are affected by fatigue.
- Through the FOG, PTTF, FRMS TF and FOSTF, IATA fosters the development of and advises in fatigue-related matters.
- The IOSA Audit, done every two years, assesses an airline's conformity with applicable safety standards. The standards are governed by the IOSA Task Forces.

FRMS in IOSA

- We introduced the concept of FRMS in the IOSA standards in ISM Edition 6 of April 2012
- Currently IOSA has six standards pertaining to the FRMS, (three each in FLT and CAB scopes for pilots and cabin crew, respectively)

Basic standard in the IOSA

- FLT 3.4.3A and CAB 3.1.4A: require the operator to manage flight & cabin crew fatigue in accordance with
 - Either the FDTL prescribed by the state, or
 - The FRMS of the state or
 - In accordance with the FRMS of the operator that is approved by the state.

Associated Standards about FRMS

- FLT 3.4.3B and CAB 3.1.4B apply to those operators that have implemented FRMS to ensure that their FRMS incorporates scientific principles and knowledge
- FLT 3.4.3C and CAB 3.1.4C also apply only to those operators that have implemented FRMS, recommending that operators to integrate the risks identified in the FRMS with the SMS of the company.

Focus of Auditors on FRMS standards

- Auditors assess the default FDTL as required by the State, and optionally, the FRMS
- Auditors examine the documents & records of the operator to verify that the standards are documented as intended, and
- Then observe real-life situations in crew management & control to ensure that the standards are implemented as documented

Data Output

- FLT 3.4.3A and CAB 3.1.4A: This is a mandatory standard. The only Finding against this standard in our database has been due a lapse in the record-keeping of the Flight & Duty Time Limitations. There was no finding on FRMS.
- FLT 3.4.3B/C and CAB 3.1.4B/C have generated a “Not Applicable” in all cases

Data Analysis

- ICAO's Annex 6 Section 4.10 offers states the option of either a Flight & Duty Time Limitation, or a FRMS.
- Operators that may opt for an FRMS need to prove that the proposed FRMS shall provide greater safety equivalent or better than the prescriptive regulations of the state for managing fatigue
- While operators find it difficult to quantify the fatigue relief measures, the regulators find it difficult to grant formal approval of the operator's FRMS as direct comparisons are very difficult to make.

Conclusion

- While IOSA continues to monitor airlines by way of audits, our limitation is our inability to make a determination on the actual pulse of the airline's crew.
- Our standards are adopted from those of ICAO: so as long as there is an option of retaining basic FDTL instead of the FRMS, IOSA will continue to offer the same in its standards for all airlines.



The End