



**ECA**  
Piloting Safety



**Dead-Tired.eu**

## EASA proposal for air crew fatigue

***“A tired pilot is a dangerous pilot. EASA’s rules fail to address this.”***

- When drafting new EU-wide rules to prevent air crew fatigue, the **EU Institutions must make passenger safety their Number 1 Priority**.
- This means: the **EU must base its rules on scientific evidence**, on a precautionary approach (‘if in doubt chose the safer option’), and on safety considerations only.
- **Decades of scientific research**, including 3 scientific reports commissioned by EASA in 2011, **shows where the EU should set the crews’ working limits** to prevent fatigue.
- But **EASA’s proposal** disregards scientific evidence, runs counter to the precautionary principle, and **allows flight schedules that are outright dangerous**.
- EASA’s text<sup>1</sup> will **not ensure safe operations** for Europe’s travelling public, e.g.:
  - **‘Short-call’ Standby**: EASA’s rules expect a pilot to land plane full of passengers after having been at work and awake for over 22 hrs. – **This is not safe!**
  - **Night flying**: scientists are unanimous that such flights should be limited to 10 hrs to prevent high fatigue levels. But EASA proposes 11-12 hrs. – **EASA takes risks!**
  - **Open-ended Standby**: Crews can be put on open-ended “Reserve” standby for up to 23 days, to be called at any moment day or night for a later full flight duty. Sleep disruption and deprivation will result. – **Flexibility before safety!**
  - **Opting out**: EASA allows **evading stringent rules** on flight schedules that disrupt sleep patterns (e.g. early starts). – **EASA undermines its own rules!**
  - **Long work days with high workload**: the rules must protect against the fatiguing effect of long days with multiple take-offs and landings. The scientists are unanimous on this. But EASA dismissed their advice. – **Science disregarded, yet again!**
  - **Safety regression**: These rules will be applied across Europe. They replace existing *national* safety standards which are *higher* in several EU countries. But they are not allowed to keep higher standards. – **This promotes lower safety standards!**
- EASA defends its proposal by focusing on a number of improvements compared to the current EU rules. But these rules are a strikingly low baseline to compare with, and the **improvements are by far outweighed by new provisions allowing highly risky schedules**. – Improvements should not deflect from the proposal’s severe deficiencies.
- ECA calls upon the EU Commission, Transport Ministers and the EU Parliamentarians to **reject this proposal in its current form** and to **amend it into a safe package** that puts passenger safety before the commercial interests of the airlines.

<sup>1</sup>For EASA’s full proposal (EASA Opinion-2010-14) see: <http://www.dead-tired.eu/downloads/downloads-home>

**Background: Why crew fatigue is a problem**

- Since the 1944 Chicago Convention, it is recognised that pilot fatigue (due to long duty hours, insufficient rest/sleep opportunities etc.) can **pose a risk to the safety of air operations**. This risk needs to be controlled by the means of Flight Time Limitations.
- **Fatigue reduces the physical and mental ability to operate safely**. A fatigued person may lose 80% of his/her attention capabilities and 70% of responsiveness. The effects of severe fatigue are comparable to those provoked by alcohol. However, whilst alcohol is forbidden in transport, fatigue in the cockpit is tolerated.
- **Pilot fatigue** contributes to **15-20% of all fatal air accidents** related to human error, as show the recent fatal accidents in the USA (Colgan Air, 2009, 50 killed) and India (Air India, 2010, 158 killed).
- In May 2012, an **Air Berlin** plane requested an emergency landing in Munich, due to the pilots being severely fatigued. In 2007, an aircraft with 288 passengers on board comes off the runway in **Iceland** when landing. The investigation shows: fatigue was to blame.
- **Fatigue is already a reality in Europe's cockpits** today. Surveys among pilots show that 71-90% of pilots said they made errors due to fatigue, with 50-54% saying they dozed off in the cockpit without notifying their colleague.
- This is why **Europe needs strict, scientifically based rules to prevent fatigue** from posing a risk to the safety of passengers, crew and people living under the flight-paths.

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