



Seychelles Civil Aviation Authority

OPERATIONAL DIRECTIVE



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Flight Time Limitations – Operator Requirements and Clarifications

This Operational Directive contains information that is intended for mandatory compliance.

Recipients are asked to ensure that this Operational Directive is copied to all members of their staff who may have an interest in the information (including any 'in-house' or contracted maintenance organisations and relevant outside contractors).

1. Reason and Explanation

- 1.1 Regulation 33 of the Civil Aviation (Safety) Regulations, 2017 requires that operators establish a Flight Time Limitation Scheme that is approved by the Authority. The Authority has adopted UK CAA CAP 371 which is to be utilised in lieu of EASA Part ORO.FTL.
- 1.2 During the course of its safety oversight programme, the Authority has recognized that there are many issue that require re-enforcing and clarification on the part of the Authority.
- 1.3 This Operational Directive is OD is to present additional operator requirements and clarification in order that the approved schemes be implemented and applied as intended.
- 1.4 The contents and requirement of this Operational Directive was previously issued by Safety Directive SD 2018-04 issued 18th January 2018.

2. Operational Directive and Applicability

- 2.1 The Authority, in exercise of its powers under regulation 85 of the Civil Aviation (Safety) Regulations 2017, directs the operator ('a specified operator') of any aircraft which is:

(a) registered in the Seychelles; and

(b) conducting commercial air transport operations

to comply with the requirements set out in paragraphs 3 of this directive.

3. Requirement: Flight Time Limitations – Operator Requirements and Clarifications

3.1 Operational Robustness of Rosters

- 3.1.1 The operator should establish and monitor performance indicators for operational robustness of rosters.
- 3.1.2 Performance indicators for operational robustness of rosters should support the operator in the assessment of the stability of its rostering system. Performance indicators for operational robustness of rosters should at least measure how often a rostered crew pairing for a duty period is achieved within the planned duration of that duty period. Crew pairing means rostered positioning and flights for crew members in one duty period.

3.2 Nutrition- Meal Opportunity

- 3.2.2 During the FDP there shall be the opportunity for a meal and drink in order to avoid any detriment to a crew member's performance, especially when the FDP exceeds 6 hours.
- 3.2.3 An operator shall specify in its operations manual how the crew member's nutrition during FDP is ensured.
- 3.2.4 The operations manual should specify the minimum duration of the meal opportunity, when a meal opportunity is provided, in particular when the FDP encompasses the regular meal windows (e.g. if the FDP starts at 11:00 hours and ends at 22:00 hours meal opportunities for two meals should be given).
- 3.2.5 It should define the time frames in which a regular meal should be consumed in order not to alter the human needs for nutrition without affecting the crew member's body rhythms.

3.3 In-Flight Rest

- 3.3.1 In-flight rest should be taken during the cruise phase of the flight.
- 3.3.2 In-flight rest periods should be allocated in order to optimise the alertness of those flight crew members at control during landing.

3.4 Standby other than Airport Standby Notification

- 3.4.1 Operator procedures for the notification of assigned duties during standby other than airport standby should avoid interference with sleeping patterns if possible.
- 3.4.2 Scientific research shows that continuous awake in excess of 18 hours can reduce the alertness and should be avoided.

3.5 FDP Stability

- 3.5.1 Change a schedule and/or crew arrangements if the actual operation exceeds the maximum flight duty period on more than 33% of the flight duties in that schedule during a scheduled seasonal period.
- 3.5.2 The operator shall develop and regularly update a detailed planning document to demonstrate proper planning within FDP reflecting all flights in the schedule to include:
- a) Average travelling time planned

- b) Reporting time
- c) Designated reporting place/point
- d) Scheduled departure time
- e) Schedule arrival time
- f) In-flight rest details (if applicable)
- g) Split duty (if applicable)
- h) Planned Duty and FDP

3.6 Last Minute Dispensations/Alleviations

- 3.6.1 The Flight Operations Inspectorate will not issue any last minute dispensations or alleviations on any requirements of CAP 371.

3.7 Applications for FTL Variations

- 3.7.1 Applications for permanent variations where the operator would like to cater for a long term variations shall be made by letter at least four weeks (20 working days) in advance accompanied by the relevant Operations Manual Proposed Amendment.

- 3.7.2 The Operator should provide supporting evidence that an equivalent level of safety can be achieved for any variation. This shall include a risk assessment and compensating mitigation proposals.

- 3.7.3 A clear distinction should be drawn between the issue of a new flight times limitation approval and the use of a variation by the Operator. The variation is for just one section of the scheme while the approval covers the entire flight time limitation scheme.

- 3.7.4 Request for FTL variations are referred to the UK CAA under the Desktop Advisory Service by the Authority for assessment using the SAFE toolkit.

- 3.7.5 Following approval of the FTL Variation and associated Operations Manual Amendment, the Operator shall ensure that the Operations Manual is revised/amended before use of the variation is made. This amendment may be either in the form of a change to the main manual or by use of a flight crew notice.

4. **FTL Clarification and Interpretation**

4.1 Definitions

- 4.1.1 It is noted that the term "*home base*" is utilised without a clear definition.

- 4.1.2 "*Home base*" shall mean the location nominated by the operator to the crew member from where the crew member normally starts and ends a duty period or a series of duty periods and where, under normal circumstances, the operator is not responsible for the accommodation of the crew member concerned.

- 4.1.3 Any alternative application of the concept of home base, whether or not already accepted by the Authority, shall be re-submitted to the Authority and the operator shall consider applying for a variation.

4.2 Travelling Time

- 4.2.1 Although Section B (9) prescribes travelling time limitation in terms of travelling to and from home base, the requirements also apply equally to accommodation arranged by the operator when away from base (see CAP 371 definitions).
- 4.2.2 Travelling time extends from pickup to the designated reporting place/point where pre-flight duties will commence. In considering the travelling time and reporting time, the operator shall take into account the time required to complete airport formalities where the designated reporting point is on the airside. Any time in excess of the maximum travelling time (90 mins) to the reporting place/point shall count as FDP.

4.3 Delayed Reporting Time in a Single FDP

- 4.3.1 It has been noted that on occasions of delays or last minute changes of reporting place (aerodrome of departure) or time, that the provision of Section B (10) are not always complied with by crew scheduling or other departments. Instances of crew being disturbed within their period of rest prior to a duty without the proper consideration of such provision continue to be noted.
- 4.3.2 The intent of Section B (10.2) is to highlight the fact that the operating crew should not be disturbed for any reason during a rest period except to advise the crew of a delay more than the minimum rest required. This shall be made known to all relevant departments such as Crew scheduling, Ground Services and Engineering. Operators shall pay particular attention to such provisions and apply them accordingly.
- 4.3.3 In cases where the reporting time and place differs from the schedule and is changed at the last moment after the crew report for duty, it shall be noted that any travelling time in excess of the average travelling time to the original time and place of departure shall count as positioning and form part of the FDP.

4.4 Standby Duty

- 4.4.1 It should be noted that standby duty is a form of duty that also requires the minimum rest period (see Section B (17)). In view that the limit of standby duty is 12 hours, it follows that there shall be a period of 12 hours rest following a standby duty.
- 4.4.2 The use of split standby periods of less than 12 hours shall not be utilised. Rosters promulgated shall include specific details on exact times the crew are on and off standby duty.

4.5 FDP – Reporting time

- 4.5.1 Section B (13.1) makes provision for a reporting time of 1 hour for large companies. It is essential that the reporting place/point is clearly established and documented especially when away from base.
- 4.5.2 Section B (13.2) states that the utilisation of a non-standard reporting time, designed to take advantage of an increased FDP from a more favourable time band, must not be used.
- 4.5.3 The Authority continues to note in some cases of deceiving practices such as promulgation of rostered reporting time that meet the FDP limit but subsequent advice to the crew (phone, email, memo) informing them to report at a different time.

4.5.4 For flights involving more than one sector, it is incumbent on the Commander of the originating flight to ensure that the provisions of the operator's approved FTL scheme will be adhered to for the series of sectors. It is not acceptable for the first Commander to consider only that the first sector is acceptable and knowingly hand over a flight with crew that are not in compliance at intermediary points to any provisions of the scheme.

4.6 Extension of Flying Duty Period by In-flight Relief

4.6.1 The provisions of Section B (15) apply to each crew member. For example, where it is operationally required that the FDP be extended by 1 hour, each crew member shall have rested for a period of not less than 3 hours (which may not be consecutive).

4.6.2 In the case where in-flight relief is to be utilised, all flight crew members shall commence their FDP at the same reporting place and time if they are part of an augmented crew. No single crew member can start a positioning sector to then augment a crew on the same flight. Crew members commencing the scheduled rest period immediately after departure shall form an integral part of the crew for the purpose of pre-flight briefings and preparation.

4.6.3 In the case of rest being undertaken in Business Class, the provision of a screened area (15.2) need not be applied on the following conditions:

- a) Either the first or last row is utilised by the crew; and
- b) Adjacent seat(s), not separated by an aisle, may only be occupied by another crew member; and
- c) The crew are provided with ear plugs and eye shades; and
- d) A procedure is put in place for the cabin crew to ensure minimum disturbance to crew resting (example re-arranged times for meals and drinks prior to the rest commencing).

4.6.4 In the case of rest being undertaken in Economy Class, the operator shall ensure the provisions of 15.2 are adequately complied with in regards to minimal disturbance, screening and comfort.

4.6.5 Under all circumstances where in-flight relief is utilised, such arrangements shall form part of the joint (flight and cabin crew) pre-flight briefing and the commander shall satisfy himself/herself that the arrangements are adequate.

4.6.6 In the case if cabin crew, planned in-flight rest shall take into account the minimum cabin crew required to contain in-flight emergencies.

4.7 Extension of Flying Duty Period (FDP) - Split Duty

4.7.1 Section B (16) presents the possibility of extending the FDP by the application of a split duty. The intention of this provision is that the original FDP may be increased by the amount credited from the rest undertaken in the rest period within the FDP. It shall be noted that the period of rest is inclusive of the extended FDP.

4.8 Rest

4.8.1 Section 17 does not make any provision for a minimum period that the room must be available for a crew member for the purpose of rest particularly periods greater than 12 hours. Cases have been observed where crew do not get allocated a room upon arrival at the hotel for

significant periods of time and in such cases the sleeping or relaxation opportunity is diminished.

4.8.2 In such cases, where the rest period exceeds 12 hours, the room shall be made available to the crew member to afford a sleeping opportunity for a period not less than 85% of the rest period.

4.9 Aircraft Commander's Discretion to Extend a Flying Duty Period

4.9.1 Section B (18.2) contains requirements in regards to discretion to extend the FDP. It caters for single sector flight as well as multi-sector flight in terms of what is allowed in such circumstances.

4.9.2 In a Flying Duty Period involving 2 or more sectors, whilst the maximum extension may be 3 hours in the single FDP, only 2 hours discretion may be exercised prior to the first and subsequent sectors. The additional 1 hour discretion may only be exercised immediately prior to the last sector on a multi-sector flight.

4.10 Days Off

4.10.1 Section B (20) states that the provision of days off shall as far as possible be at home base. This is very subjective and requires further qualifying.

4.10.2 It is accepted that certain routes and crew scheduling patterns may not allow certain days off to be undertaken at home base in all occasions especially the one day off in seven days.

4.10.3 The Authority has considered this matter in terms of cumulative fatigue management as well as the demands of the industry (operational flexibility) and has concluded that as a minimum the following provision of 20.4 shall be provided at home base:

- a) a minimum of 7 days off in any consecutive 4 weeks, and
- b) an average of at least 8 days off in each consecutive 4 week period, averaged over 3 such periods.

5. **Queries**

5.1 Any queries as a result of this Operational Directive should be addressed to Head of Flight Operations and Flight Crew Licensing Inspectorate at the following e-mail address: hfo@scaa.sc

6. **Revocation and Commencement**

6.1 This Operational Directive comes into force **27th May 2019** and will remain in force until revoked by the Authority.

Head Flight Operations and Flight Crew Licensing Inspectorate