



EASA
European Aviation Safety Agency

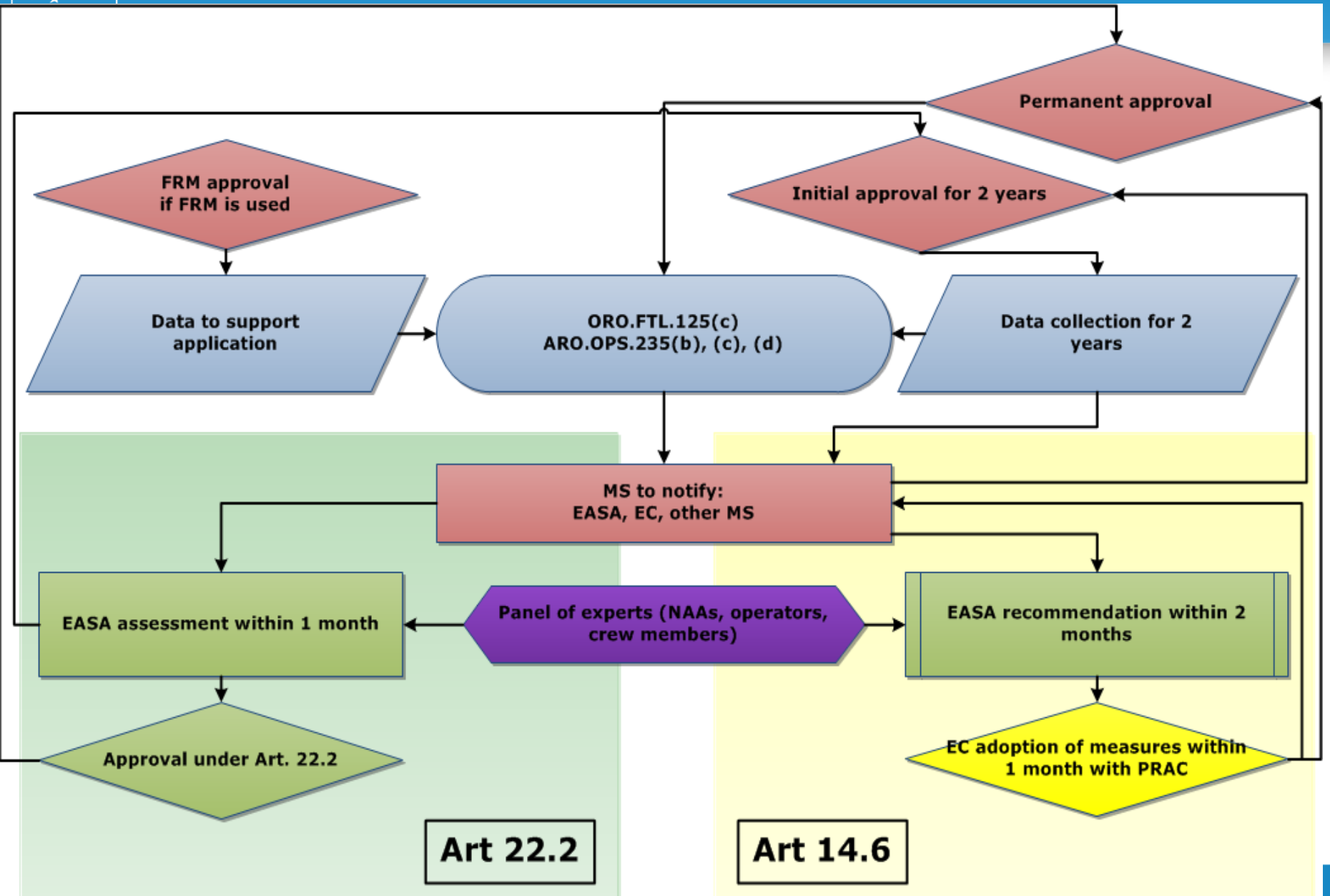
Approval of IFTSS under ARO.OPS.235

ENAC FTL Workshop
Rome, 12 June 2015

Your safety is our mission.



Background





Time frame for assessment

Panel of experts (NAAs, operators, crew members)



Art. 22(2)

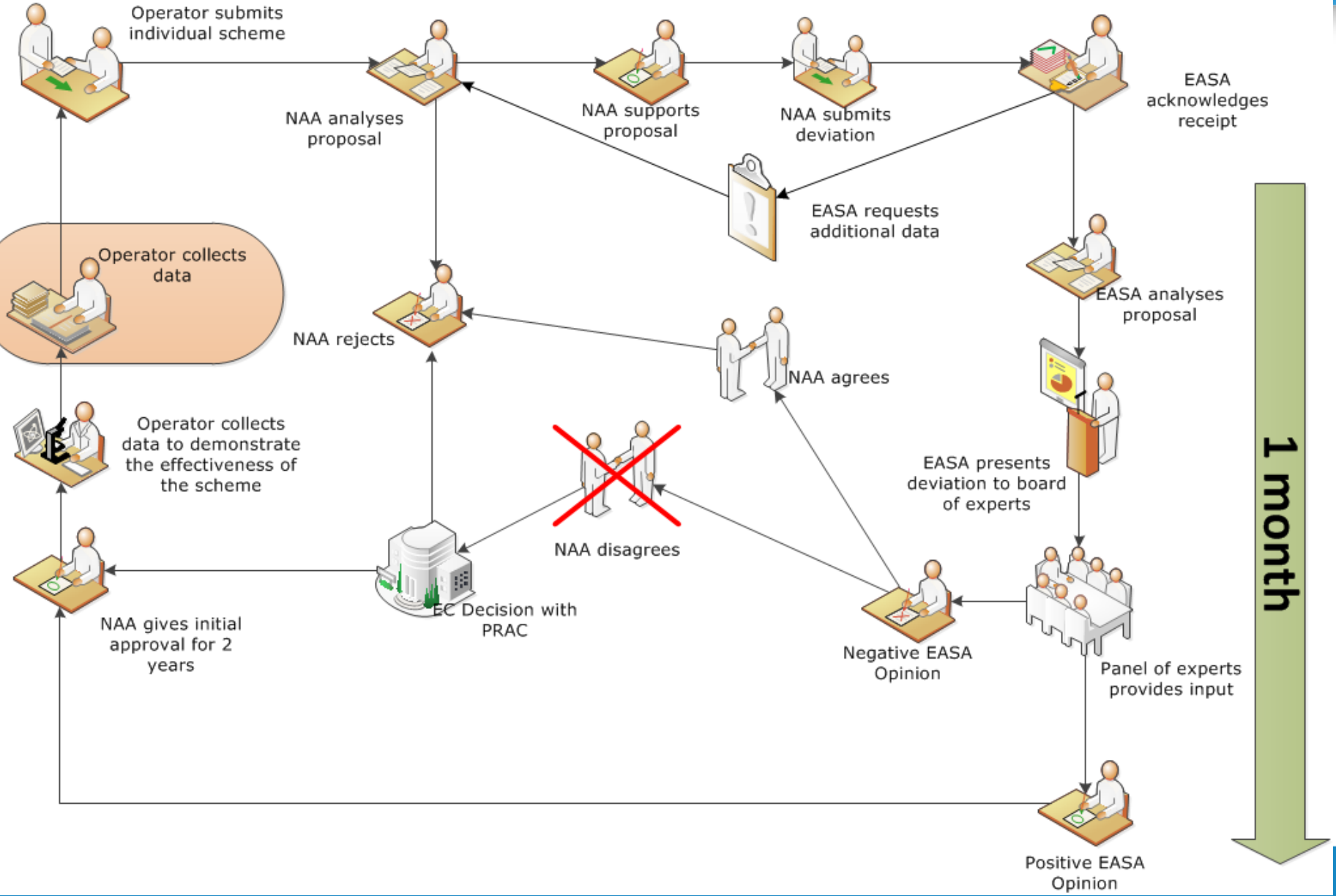
- 1 month

Art. 14(6)

- 2 months EASA
- 1 month PRAC



Workflow Art. 22.2 Initial approval

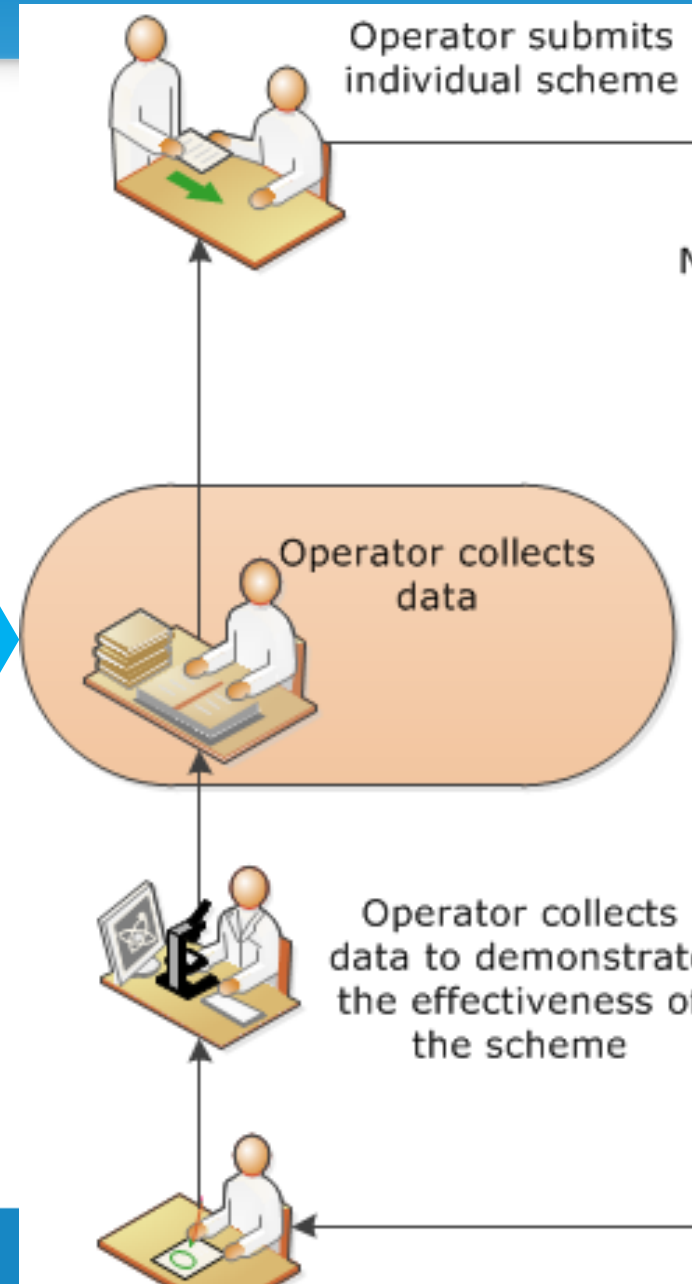




Workflow Art. 22.2 Initial approval

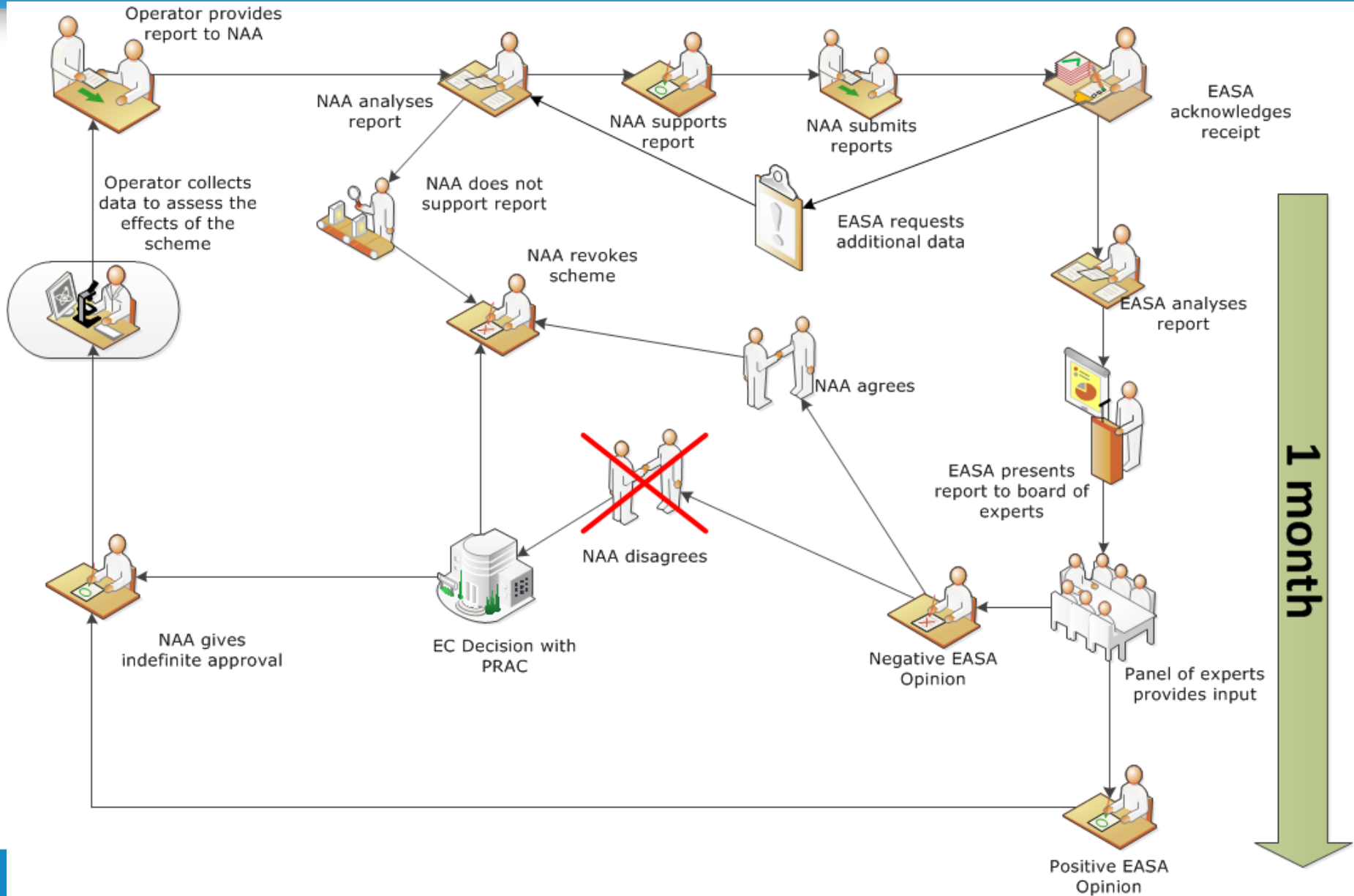
ORO.FTL.125(c)

[...] an assessment demonstrating that the requirements of Regulation (EC) No. 216/2008 and of this Subpart are met.



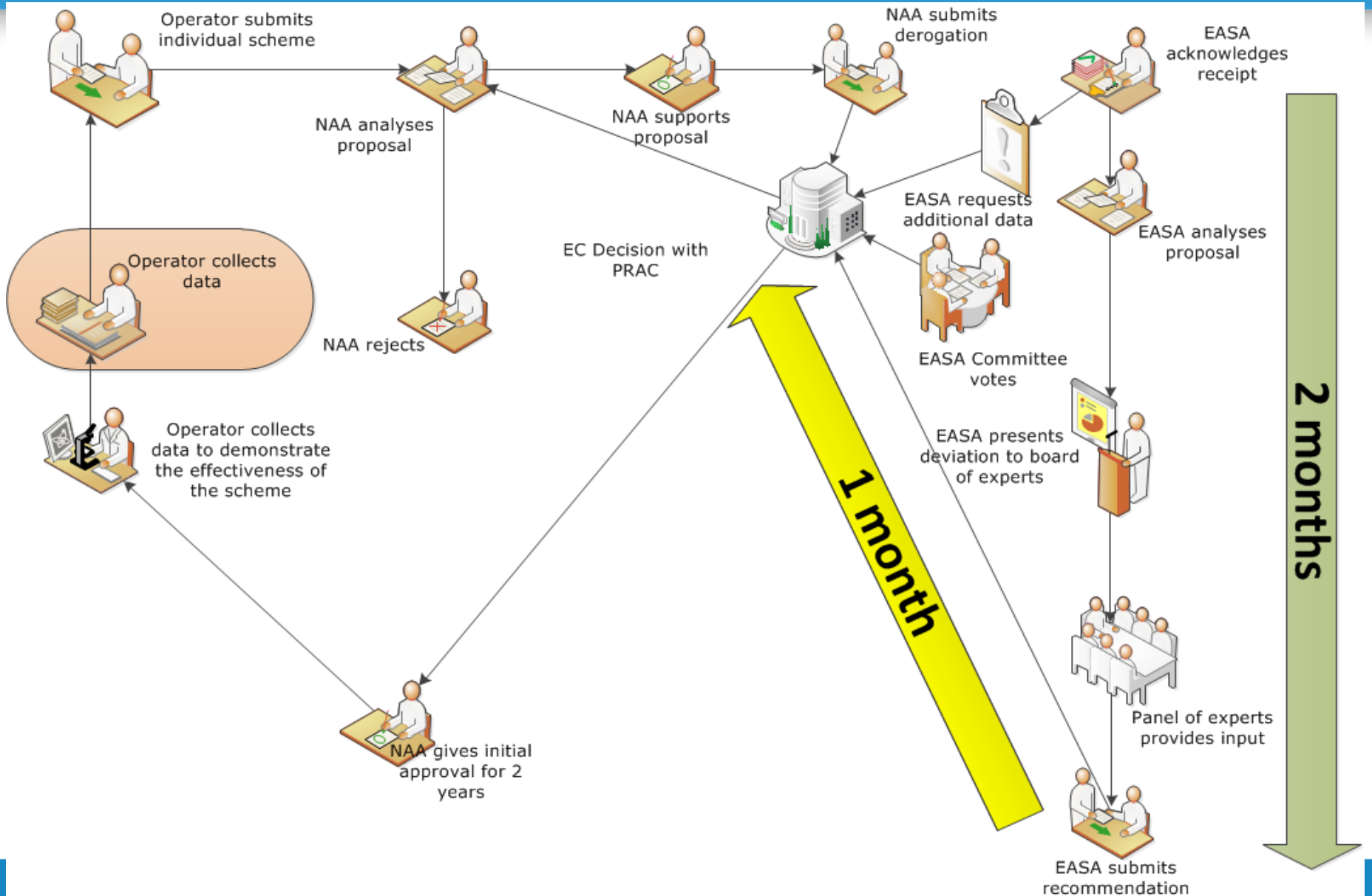


Workflow Art. 22.2 Indefinite approval



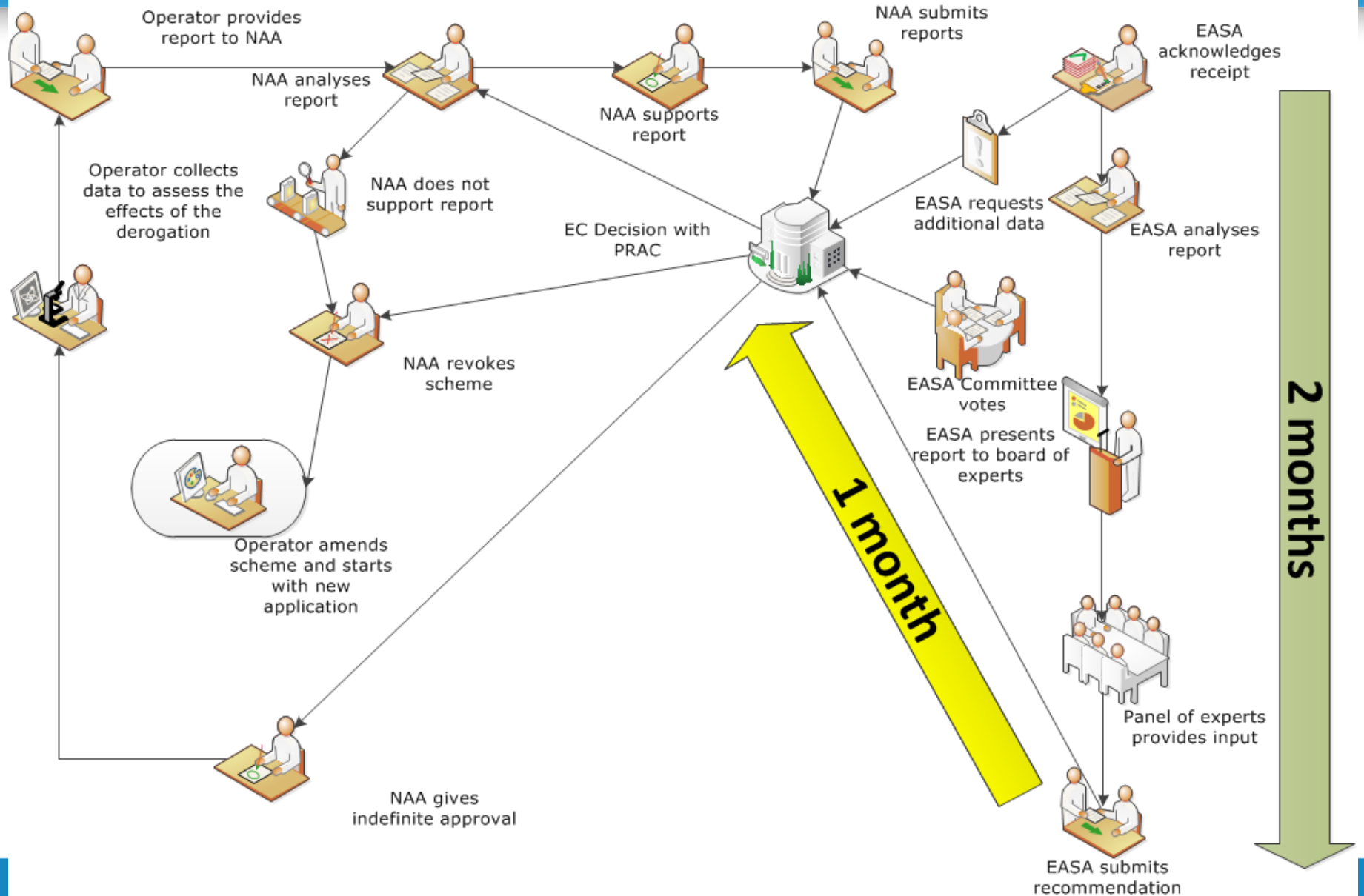


Workflow Art. 14.6 Initial approval





Workflow Art. 14.6 Indefinite approval





Stepping stones towards IFTSS approval

Use of SMS processes to demonstrate compliance with ORO.FTL.110 (Operator responsibilities)

Demonstration of data collection capability

- FRM approval

IFTSS proposal based on meaningful data

- Initial approval

Data collection to confirm IFTSS

- Indefinite approval



Operator FRM Implementation Process

Preparation

Decide

Plan

Enable

Develop

Trial

Prepare

Propose

Conduct

Implementation

Adjust

Implement

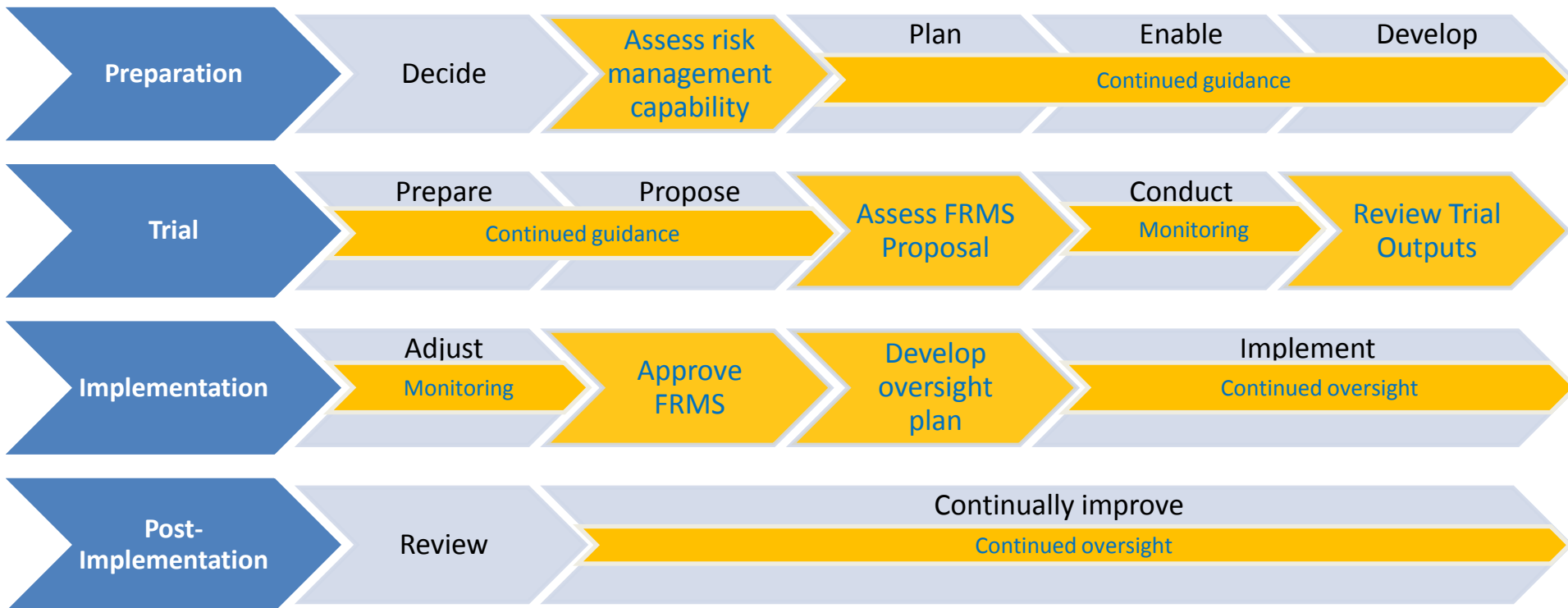
**Post-
Implementation**

Review

**Continually
improve**



Authority FRM Approval Process





Risk Assessment of the Operator

- Notification of intent is received from an operator
- Confirm key personal in place
- Review resources to support development
- FRM checklist
- Review operator's implementation plan
- Conduct a risk assessment of the operator
- Acceptance of the operator's implementation plan



Operator develops a Trial proposal

- Roles for assuring the safety performance of the FRM are established
- Necessary authorities and communication channels are active
- FRM safety performance indicators have been developed and agreed on
- The procedures and process for periodic evaluation of the safety performance indicators are established
- Appropriate feedback is established between the FRM processes and the FRM safety assurance processes
- FRM documentation/training/communication processes are fully implemented



NAA Reviews Trial proposal

- Acceptance of initial FRM processes
 - Review data and information collected
 - Review collated reactive, proactive and predictive risk assessments
 - Review proposed risk mitigations
 - Evaluate the specific safety case
 - Agree to adjustments in the mitigations if necessary
 - Review initial training programme
 - Review fatigue safety promotion material and methods
 - Agree on a trial timeline



Evaluating the Safety Case

Key elements when reviewing the trial proposal

- **Six steps**
- Assessment of nature, scope and impact of proposed change
- Assess hazard and consequence identification
- Evaluate the way the risk has been assessed
- Assess the risk mitigations
- **Assess the claims, arguments and evidence**
- Assess assurance plan to manage residual risk



NAA Approval Process

Questions to ask

- Has the fatigue related risk been clearly identified?
- Who has ownership of the fatigue risk assessment?
- Is the language, fatigue risk matrix and process appropriate?
- Who is involved in the FRM?
- Does the fatigue risk assessment give you all the relevant information to make an assessment?
- Is the fatigue risk assessment objective?
- Have assumptions been made?
- Does the fatigue risk assessment have a conclusion?
- Do you understand it?
-Is it reasonable?



Reminder – ICAO states

FRM processes must be functioning before approval can be given by State



Operator Assurance Process

- Check that the FRM is working as intended and is effective
- That it is meeting its regulatory requirements
- Identify where changes in the operating environment have the potential to increase fatigue risk
- Identify areas for improvement in the management of the fatigue risks
- Verify the fatigue risk mitigations are in place and effective

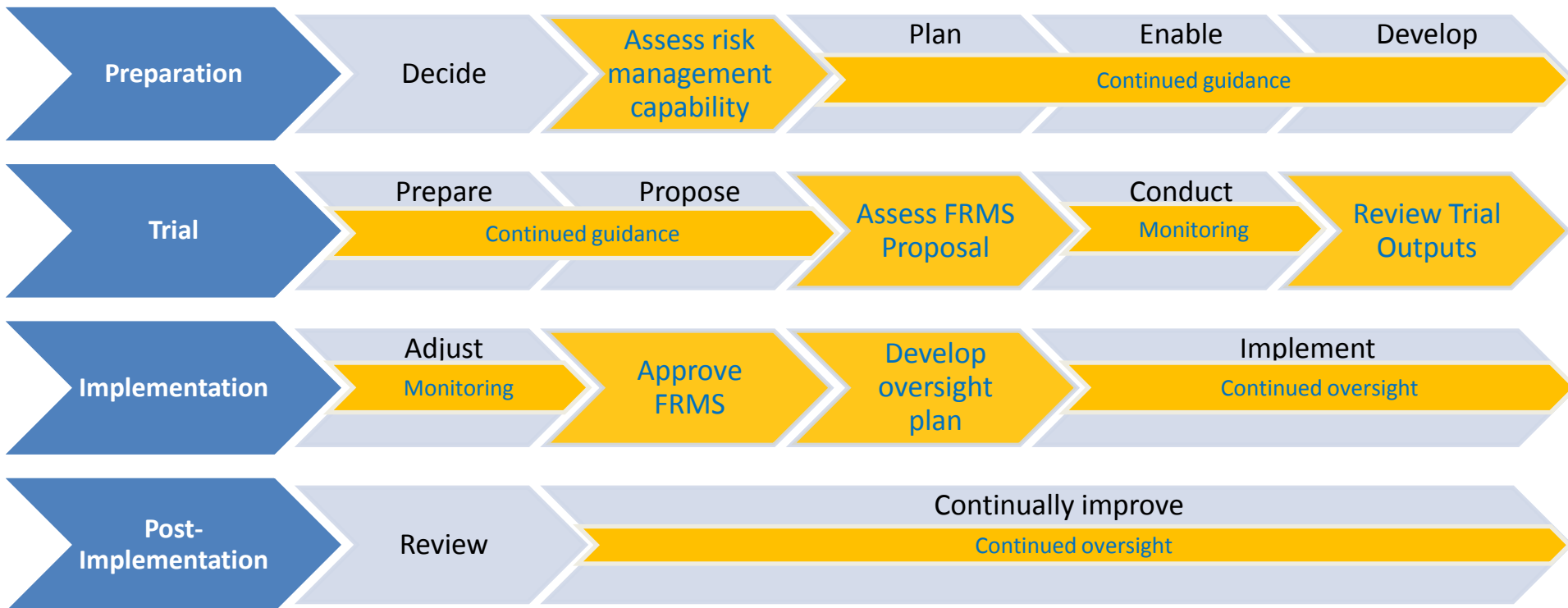


NAA Final Approval Process

- Approval of FRM
 - Validation of the FRM assurance processes
 - Review performance against the agreed SPI's
 - Revise limits as required
 - Review change management as a result of assurance functions
 - Review continuous improvement processes
 - Review recurrent training and promotion processes
 - Review final documentation
 - Grant approval



Authority FRM Approval Process





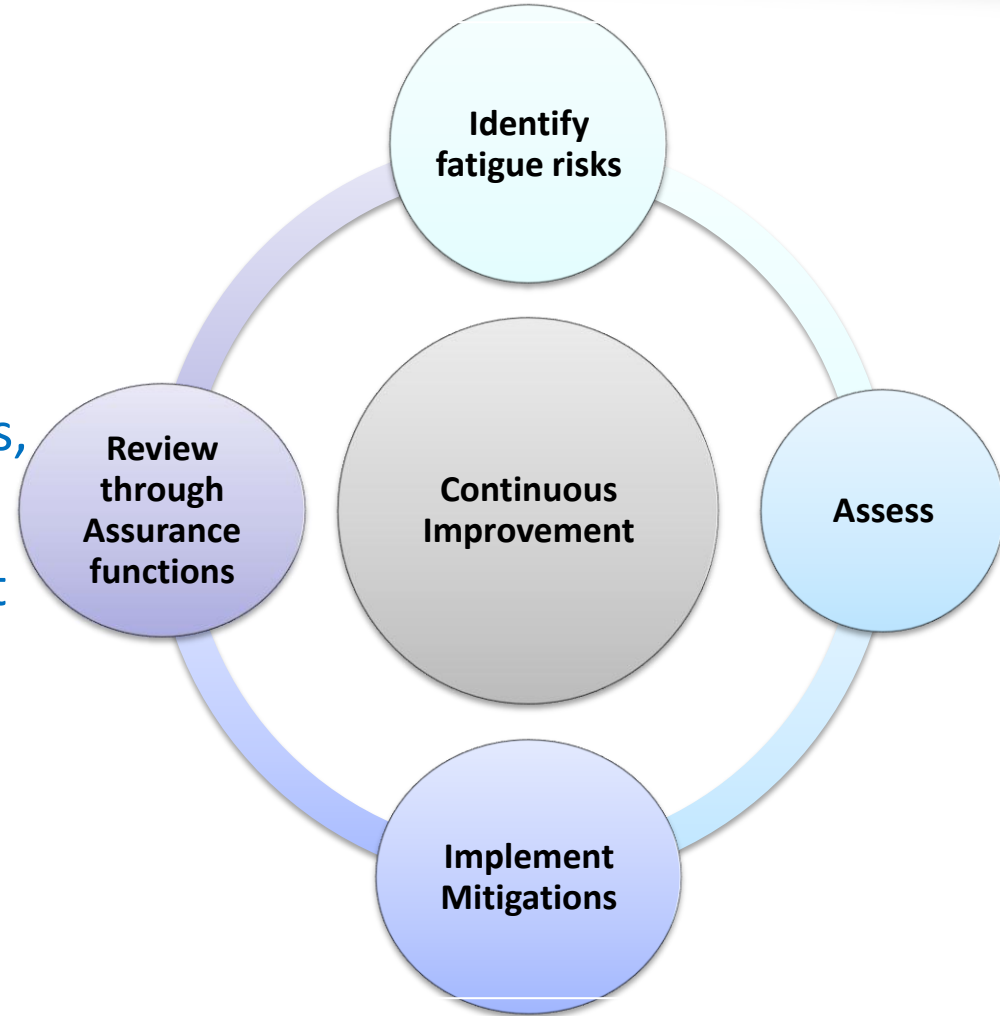
NAA Continuing Oversight Actions

- Gap analysis
- Do you do what you say you do?
- Show me
- Assessing fatigue safety performance indicators and targets
- Engaging at different levels
- Asking difficult questions
- Judging the responses and evidence
- Review fatigue safety assurance functions and actions
- **Assess overall buy-in and the assess the interfaces between inter-departmental**



FRM Continuing Oversight

- Assess agreed performance indicators and mitigation measures using information from the assurance process
- Work with the operator to adjust mitigations and/or limits, if required
- Set up continuous review audit programme





EASA
European Aviation Safety Agency

Summary

Regulatory confidence is the first step

Demonstrate management of fatigue risks within the operation under prescriptive regulations through the SMS

FRM requires demonstrable operational maturity

An FRM takes time to develop and mature, so work closely with all stakeholders – regulator / operator / crew

Your safety is our mission.



EASA
European Aviation Safety Agency

Summary

Upstream pre-assessment by
NAAs paramount

Expert input to EASA assessment

EASA Opinion

Your safety is our mission.