

The development of ICAO SARPS and guidance material for Fatigue Risk Management Systems (FRMS)

Introduction

The purpose of this information leaflet is to ensure Member Associations are aware of proposals that have been developed by ICAO to amend Annex 6 Part I in respect to fatigue management regulations. The proposals to amend Annex 6 have been accepted by the Air Navigation Commission and await final adoption by the ICAO Council in June 2011.

Background

At the direction of the ICAO Operations Panel (OPSP) a Fatigue Risk Management Task Force was formed in August 2009. The task force was charged with building upon the previous work of OPSP relating to prescriptive fatigue management regulations. The Task Force comprised the scientific community, regulators, operators and other stakeholders including IFALPA. The work of the Task Force involved preliminary drafting of Standards and Recommended Practices for an optional performance-based approach by States to fatigue management for both flight and cabin crew members. Additionally, the Task Force was tasked with providing guidance material to enable States to oversee and operators to use FRMS.

The proposed amendments to ICAO Annex 6 Part I relating to fatigue management and provisions for FRMS have been reviewed and accepted by the Air Navigation Commission in December 2010 following a period of comment from States. The proposed ICAO Standards and Recommended Practices for fatigue management now await consideration by the ICAO Council for formal adoption by ICAO in June 2011.

ICAO Timeline

The ICAO Council will meet in June during which time they will consider the proposed amendments to ICAO Annex 6 Part I International Commercial Air Transport – Aeroplanes relating to fatigue management and whether to adopt the proposals that have been put forward by the Air Navigation Commission. If the proposals are adopted by Council, then the proposed amendment to Annex 6 Part I will become effective in October 2011 and applicable from December 2011.

Effect of Proposed Amendment to Annex 6

The proposed ICAO Standards will require all States to establish regulations for the purpose of managing fatigue. The ICAO Standard requires these regulations to be based upon scientific principles and knowledge, with the aim of ensuring that flight and cabin crew are performing at an adequate level of alertness.

An important change to the current ICAO Standard is that the words “where available” have been removed after the words “scientific principles and knowledge” as currently provided for in Annex 6. All States are currently required to have prescriptive regulations for fatigue management. This requirement will continue regardless of whether they choose to allow implementation of FRMS or not. Where FRMS is approved by a State, the FRMS will be required to provide a level of safety equivalent, or better than, the prescriptive fatigue management regulations.

It will be up to individual States to decide whether or not they will allow FRMS. Should a State choose to make provision for FRMS, then individual operators will have the option of deciding whether to manage fatigue in accordance with the prescriptive regulations of the State, or to implement FRMS for part, or all, of its operations as provided by the State in accordance with ICAO Standards & Recommended Practices.

ICAO Guidance Material for FRMS

Extensive guidance material is in the final stages of drafting and will be provided in two separate manuals. The guidance comprises the following:

- ✈ An FRMS Manual for Regulators that:
 - ▶ Explains the intent of the ICAO Standards and Recommended Practices;
 - ▶ Explains the minimum requirements in the Appendix; and
 - ▶ Discusses the approval process and oversight of FRMS

- ✈ An FRMS Manual for Operators that:
 - ▶ Explains the minimum requirements in the Appendix;
 - ▶ Describes how to implement FRMS; and
 - ▶ Provides operational examples of various means of compliance

Both manuals are expected to be publicly available from the ICAO website from July 2011 and should be accessible from <http://www2.icao.int/en/FRMS2011/Pages/Documentation.aspx> within a few weeks of the ICAO Council's consideration of proposals for amending Annex 6 part I. The Manuals will also contain the provisions of the Standards and Recommended Practices (SARPs) for FRMS and the practical application and intent of the SARPs for development and implementation of FRMS.

ICAO Rollout of FRMS

In anticipation of the adoption by the ICAO Council of the proposed amendments to Annex 6 Part I, ICAO is planning a two day FRMS Symposium in Montreal on 30th and 31st August 2011. Additionally, ICAO is providing the venue for the 3rd meeting of the FRMS Forum to be held in Montreal for two days immediately following the ICAO FRMS Symposium (i.e. 1st and 2nd September 2011). Additional information regarding the forum can be found at the forum's website www.frmsforum.org. Member Associations who wish to send representatives to the Symposium and / or the FRMS Forum will be responsible for making their own arrangements including related costs for attendance. The programme and schedule of speakers for both the FRMS Symposium and FRMS Forum can be found by clicking [here](#). There is no charge for attending either the FRMS Symposium or the FRMS Forum although it will be necessary to register to attend these events at the FRMS website. ICAO are inviting its Member States, operators, industry representatives and scientists to its first FRMS symposium. Due to the high number of expected attendees, ICAO is encouraging participants to register early, ideally by July 2011.

Action by Member Association

Member Associations should note the forthcoming amendments to Annex 6 Part I. Member Associations should consider attendance at the ICAO rollout for FRMS as outlined above, especially if their State is expressing an interest in FRMS or if their members work for airlines where FRMS is likely to be introduced in the foreseeable future. The successful implementation of FRMS will depend on a tripartite approach and active participation and input from regulator, operator and flight / cabin crew representatives. It is therefore important that pilot organisations are well informed regarding the intent of the ICAO provisions relating to this optional performance-based approach to fatigue management. The symposium and forum in Montreal will provide an opportunity to get fully acquainted with all aspects related to FRMS including development, implementation and State approval processes etc.

IFALPA will be represented at both the Symposium and the Forum. Member Associations who are able to attend will benefit from the many presentations being provided and the networking opportunities that will exist. IFALPA intends to provide further information once the FRMS SARPs for FRMS are adopted by ICAO and become "official" and there has been time to review fully the associated Guidance Material.

Further Information

To view an excerpt of the IFALPA I manual dealing with FRMS click [here](#)

A Copy of the ICAO State letter concerning the FRMS Symposium can be found by clicking [here](#)