

FTL/FRM IN NEW BUSINESS MODELS – A GROUP OPS PERSPECTIVE

EASA 2nd FRM Conference – Madrid 2025

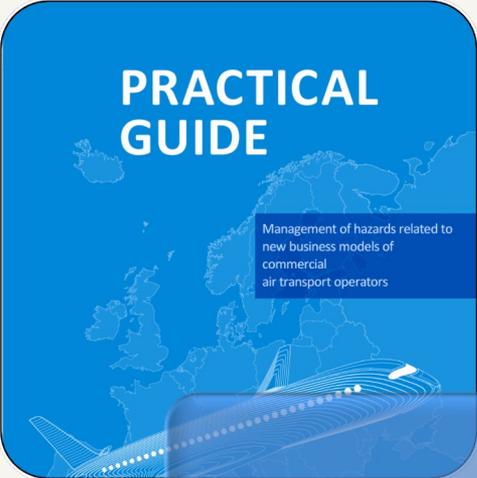
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Your safety is our mission.

Content

- Evolution of the model
- Guidelines
- FTL/FRM Cluster
- Authorities and Operator presentation
- Conclusion

Group Operations – New Business Model?



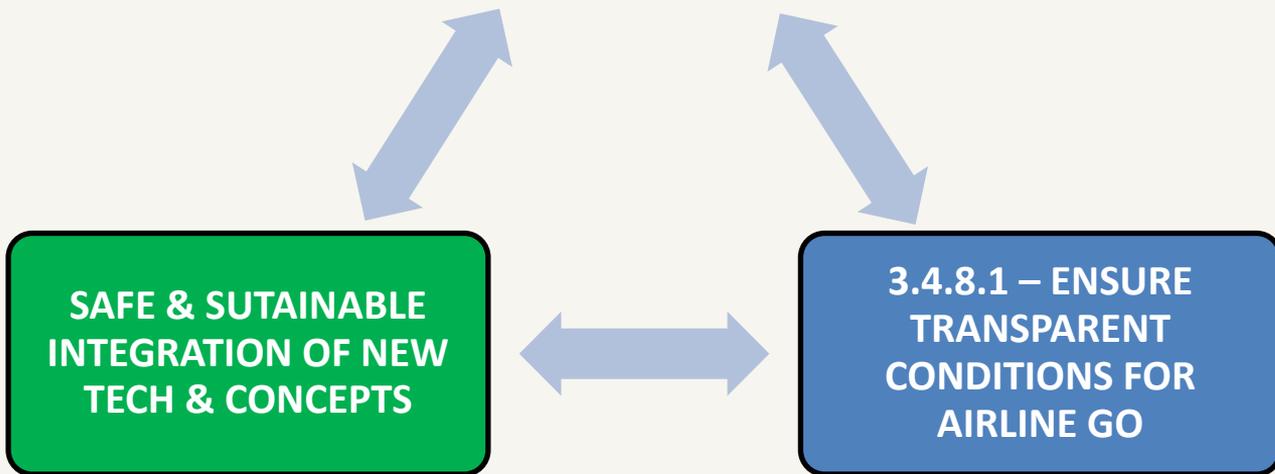
2017



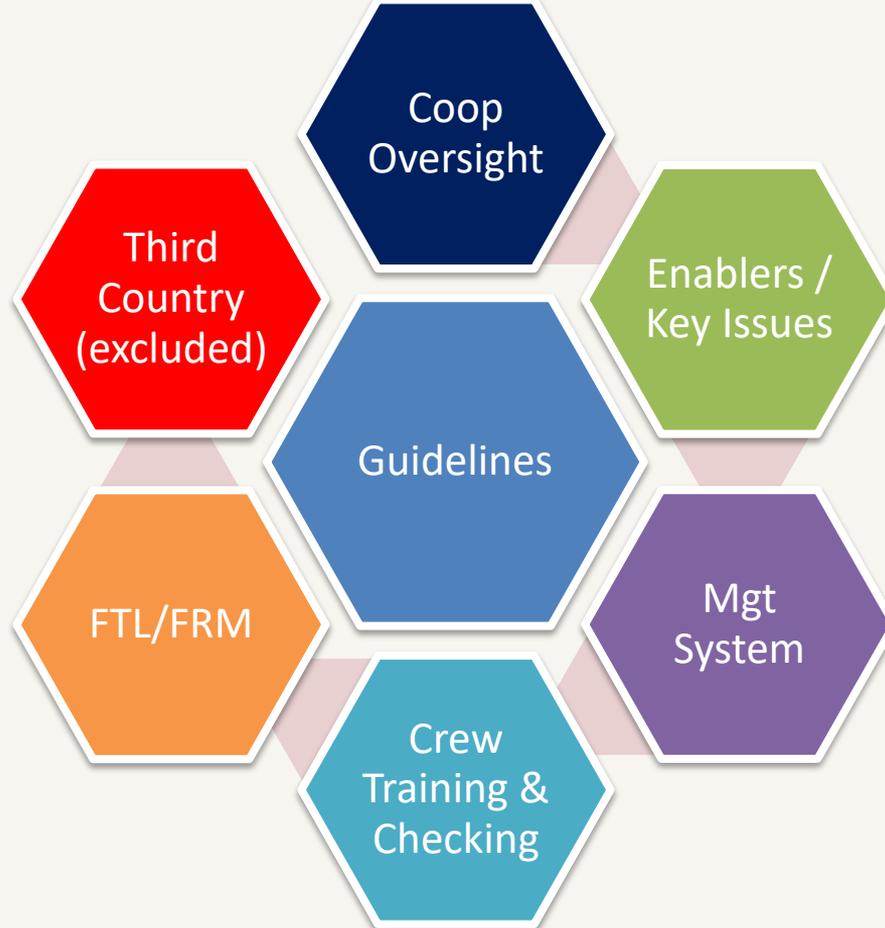
2020



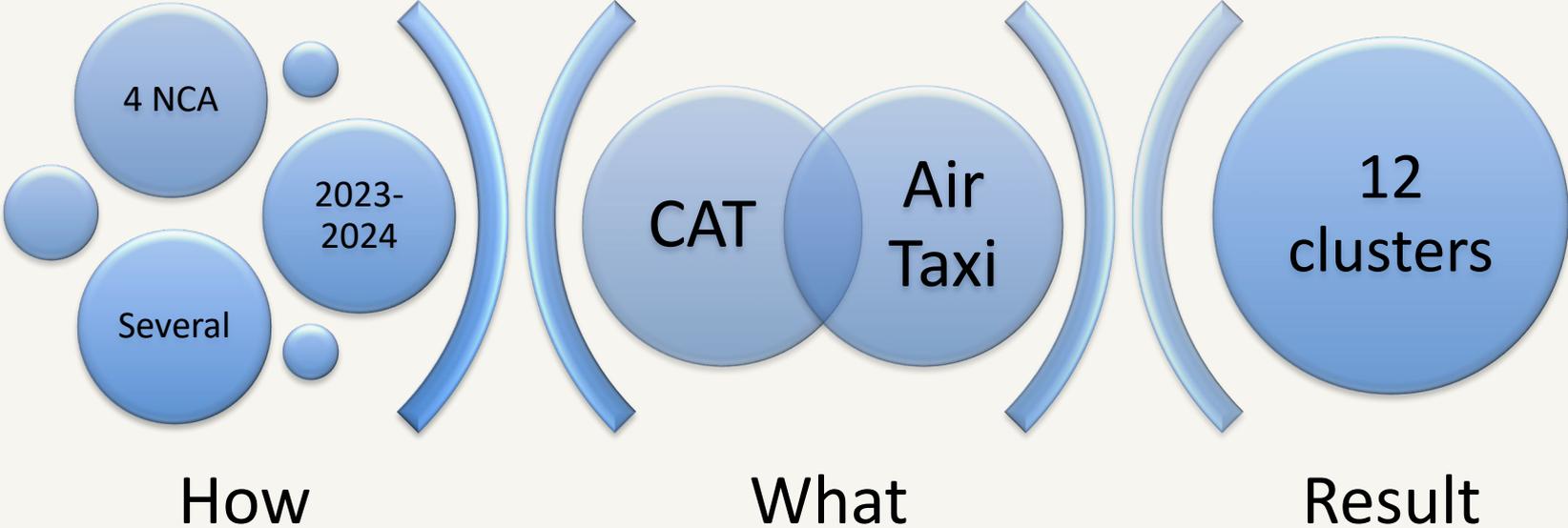
2020
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2024



What is the purpose of the Guidelines?



Guidance for the oversight of GO - FTL/FRM Issues



12 main clusters

- i. FTL01 Determination of Disruptive Schedules
- ii. FTL02 Individual Flight Time Specification Schemes (IFTSS)
- iii. FTL03 GO within Air Taxi
- iv. FTL04 Operator Responsibilities in Flight and Duty Time Limitations and Rest Requirements
- v. FTL05 Fatigue Risk Management (FRM) Policy and Procedures
- vi. FTL06 Home Base
- vii. FTL07 Flight Duty Periods and Reporting Times
- viii. FTL08 Commander's Discretion
- ix. FTL09 Delayed Reporting
- x. FTL10 Standby and duties at the airport
- xi. FTL11 FTL Records
- xii. FTL12 Fatigue Management Training



What do the clusters contain?

Table#	Title	Regulatory reference/cluster
FTL09	Delayed Reporting	ORO.FTL.205 (g) / CS FTL.1.205(d)
Description of the way(s) the rules can be implemented in the GO context.		
Common policy or	Table#	Title
	FTL10	Standby and duties at the airport
		Regulatory reference/cluster
		ORO.FTL.225(f) CS FTL.1.225(a)
Challenges associ:	Description of the way(s) the rules can be implemented in the GO context.	
1. Verification th CAs.	Common policy and procedures on standby and duties at the airport can be systematically applied across GO. (Those procedures should also	
2. Verification th the crew mem	ensure that combin:	
	Table#	Title
	FTL11	FTL Records
		Regulatory reference/cluster
		ORO.FTL.245
Recommended so continued oversig	Description of the way(s) the rules can be implemented in the GO context.	
1. CAs should sha agreement or c	Common technological solutions and arrangements can be applied for effective central data storage and retrieval.	
2. CAs to be prov operating for a		
	Challenges associated with the CA's verification of compliance with the applicable rules.	
	1. Access to FTL data stored in a central repository at GO level.	
	2. Oversight and review of FTL records held in one repository may make verification of records for own AOC difficult.	
Practices consider	Recommended solutions for CA to address the challenges and comply with Part-ARO requirements related to certification, approvals, and continued oversight.	
• GO memb	1. CAs to ensure that GO members provide full access to data/records of CDs used for the AOC under their oversight.	
	2. GO members to provide CA with customised FTL records, clearly showing where crew members have operated for other GO members.	
	Practices considered non-compliant	
	• CAs not having access to required records.	
	• Operators not maintaining complete FTL records for individual crew members preventing complete information about other duties (e.g., freelance, or part-time basis).	

IAA / TM-CAD and RYR Group

Ryanair Group Ops - Basis

- In advance of a Group Operational Trial Approval from IAA & TM-CAD: Ryanair DAC & Malta Air - 2020

Fundamentals:

- Commonality of all Operations Manuals including the Safety Management Manual
- Aircrew Guide to Group Operations (produced by participating AOCs)
- Group Operations Manual (document control)
- Identical Training and Checking Programmes
- Identical IFTSS
- Standardisation of all Group Training Personnel
- Initial position: all aircrew previously/currently Ryanair DAC qualified
- Ryanair Group Management of Change Process

Ryanair Group Ops - Implementation

- Nov 2020 One Year Group Operational Trial Approval from IAA & TM-CAD: Ryanair DAC & Malta Air
 - **Focus for trial on:**
 - Accountability
 - Operational Procedures
 - Notification of Changes to the NAAs
 - Safety Reporting
 - Data Sharing
 - Hazard Identification & Risk Mitigation
 - Crew Training & Checking
 - Human Factors & CRM
 - Approval of TREs from other AOCS(LCC/LTC)
 - Procedural Drift/Differences in operational procedures/Area of operations/fleet
 - FTL
 - Contracted Activities

Ryanair Group Ops – During Trial

Ryanair Group operational trial **Monthly Reports** – reviewed by IAA & TM-CAD

- Flights summary
- Safety Reporting and ASR Rate
- OFDM Summary
 - ✓ OFDM capture
 - ✓ OFDM Class II
 - ✓ OFDM Class III
- Flight Time Limitations (FTL) Report:
 - ✓ Number of eCDRs and number of Fatigue Reports by AOCs
- Analysis of group operations flights and reasons

Trial extended to 18 months following review of comprehensive one year report & subsequent approval of ongoing GO arrangements to date

Ryanair Group Ops

NAA's Cooperative Oversight Agreement (COA)

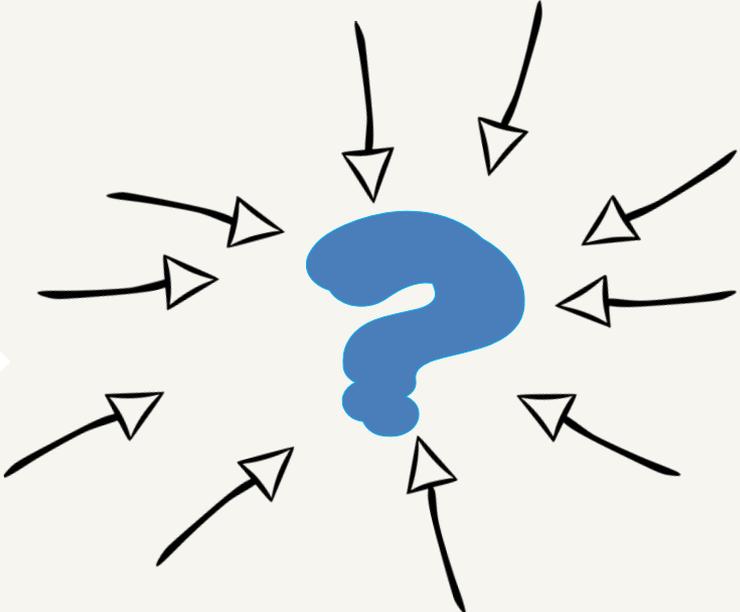
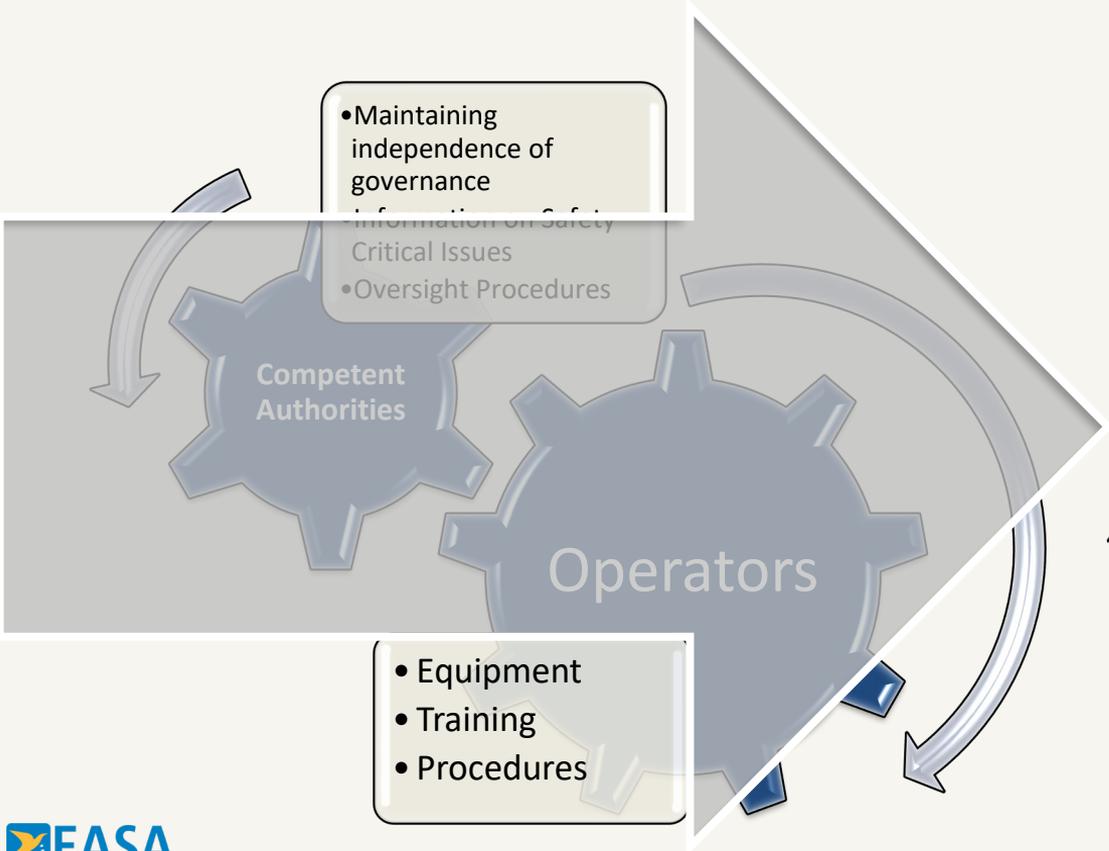
- a) Scope
- b) Group
- c) CA Inspectors
- d) Oversight methods
- e) Availability of documentation
- f) Extension of the COA to another CA
- h) Termination of the COA

Ryanair/MAY GO Protocol

- a) Concept of Operations
- b) Management of Change (incl):
 - ✓ Managing FTL requirements across AOCs
 - ✓ FTL Schemes
 - ✓ Fatigue Risk Management
 - ✓ Safety Office fatigue Risk Processes
- c) Management System
- d) Crew Training & Checking

Subject to monthly reporting to NAAs, aligned with monthly NAA/NPs Meetings, NAA/Safety Office Meetings

Conclusive Remarks



Thank you for your attention

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