

## FAQs:

ORO.FTL, Part-ORO, Air Operations, Regulations

## **Question:**

Fatigue management training ORO.FTL.250 AMC1 ORO.FTL.250: What should be the minimum requirements for a fatigue management instructor? Is a CRMi course enough? Is a safety manager ready and without other training to deliver a course? Can someone that has received a few hours course in accordance with AMC1 ORO.FTL.250 repeat the course to others?

#### **Answer:**

Although ORO.FTL does not contain prescriptive requirements determining the qualification of fatigue management instructors, those instructors are an operator's personnel and hence, need to acquire at least the knowledge specified in AMC1 ORO.FTL.250.

Any operator needs to demonstrate to the competent authority that their personnel has acquired at least the knowledge as per the syllabus in AMC1 ORO.FTL.250.

In essence, the fatigue management training is a competency-based training. The operator should identify what training and competences are needed for each personnel group: aircrew, instructors, rostering and management staff to perform their roles effectively, and what means of measuring the level of competency attained by each person who receives the training is available.

For example, a fatigue management instructor must have the training required by AMC1 ORO.FTL.250. The operator may, in addition to that, require that the instructor also complete training normally required for FRM inspectors in accordance with AMC5 ARO.GEN 200(a) (2).

Recommended fatigue management training topics for specific groups of employees can be found in the ICAO Doc 9966 Manual for the Oversight of Fatigue Management Approaches/Second Edition 2016.

Operators who aim to establish a system for fatigue risk management (FRM), should consider including the following additional subjects, for aircrew, FSAG members, FRM instructors, FRM auditors, managers, according to their functions:

• the science behind FRM;

- requirements of Part-ORO with respect to FRM;
- components of the FRM of that particular operator and its functioning;
  - FRM predictive, reactive and proactive processes
  - roster fatigue metrics
  - fatigue safety performance indicators
- employees' responsibilities with respect to the FRM;
- use of fatigue reporting systems and implementing mitigations;
- collection of fatigue data (both subjective and objective) to feed the FRM system.

The content and frequency of fatigue management training should be proportional to the operator's fatigue risk exposure. For example, a scheduled airline and an on-demand night cargo operator are likely to establish different syllabus and frequency for their aircrew training. Also, an airline with crew members commuting long hours to/from their home base, should particularly focus on the use of company's airport or hotel crew rooms for fatigue mitigation of disruptive schedules when providing fatigue management training.

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