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FRMS
The Forgotten Human Factors

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Advancing the interests
of our members
and the profession

AIPA

The Australian & International Pilots Association (AIPA) is a professional association that represents the industrial, professional and safety interests of over 2,500 Qantas Group pilots, and has been doing so since 1981.

AIPA advocates for aviation safety as a member of the Australian Aviation Unions Alliance (AAUA) and through our membership in the Australian Airline Pilots' Association (AusALPA), which is in turn a member of the International Federation of Air Line Pilots' Associations (IFALPA).

FRMS – The Forgotten Human (Factors)

I'm fine to operate. I'm just exhausted

In our approach to fatigue management, we have let the human drop out of the picture

We see those operating under an FRMS as a component of operational safety, not as a person

What is an FRMS and what is it for?

An FRMS seeks to answer whether fatigue-related risks to the safe conduct of flight operations are being adequately controlled

An approval for an FRMS does not say, and was never intended to say, that the health, wellbeing and psychosocial safety of the people in the system is being look after

Concurrent Duties

Civil aviation safety legislation was not intended to be a complete and exclusive statement of the law government safety in aviation

The *Civil Aviation Act* expressly contemplates that a duty imposed on an AOC holder does not exclude other duties

Civil aviation safety and WHS law can, and are intended to, operate concurrently

The Health and Wellbeing Costs

Chronic sleep restriction, circadian disruption, working at night and long working hours are linked to cardiovascular disease; metabolic disease; poor mental health; gastrointestinal problems; and, some cancers

Whilst there might be some uncertainty, operators cannot wait for certainty and must apply the precautionary principle by doing what is reasonable

The controls to manage the risk are likely to be largely the same that improve safety of flight

The Gap in Practice

Firstly, the outcomes we measure

Secondly, the time horizon

Third, the boundary of the system

Fourth, the psychosocial dimension

Bridging the Gap

A CASA approved FRMS is only intended to manage the safety of flight and it is not evidence of WHS compliance for fatigue

The challenge will be how do you ensure that two systems that run in parallel are independent but are complimentary and the risks and controls for one system are reflected in the other system

And Not Forgetting the Human (Factors)

Someone can be within every limit in the fatigue rules and still be carrying a cost that nobody is measuring or even considering

We have lost sight of something incredibly important – the human and the impact that fatigue can have on them outside of the duty

Are people being looked after outside of the duty period?

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THANK YOU

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