



## AERONAUTICAL CIRCULAR - AC/ALD·GEN/02/2020

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### IN THIS ISSUE

#### IMPLEMENTATION OF REVISED REQUIREMENTS ON FLIGHT AND DUTY TIME LIMITATIONS AND REST REQUIREMENTS

Bahrain CAA has issued revised requirements on Flight & Duty Time Limitations and Rest Requirements vide Revision 10 to ANTR Vol. 1 Part IV Operational Regulations - OPS 1, Subpart Q.

The revised requirements come with the concept of Fatigue Risk Management System (FRMS). FRMS has been defined by ICAO as "A data driven means of continuously monitoring and managing fatigue related safety risks based upon scientific principles and knowledge as well as operational experience that aims to ensure that relevant personnel are performing at adequate levels of alertness". In order to satisfy with the requirements for effective implementation of Flight and Duty Time Limitations to identify Fatigue Hazard and Fatigue Risk and to manage them, the regulations have been updated. Necessary guidance for operators are issued through CAP 34.

The implementation of FRMS depends on the size, complexity and operating context of the operator. The detailed Flight Times and Duty Periods are described at ANTR OPS 1, Subpart Q and relevant guidance is provided by CAP 34. The CAP 34 is further supported by Handbook and Process Guide. It shall be noted that if an operator chooses to continue with Prescriptive Scheme, they will not get any advantage in flight time limit for 12 consecutive calendar month. Following requirements in terms of cumulative flight time limit should be noted for compliance:

- i. Maximum flight time of 1000 Hrs in any 12 consecutive calendar months can only be availed when full FRMS is approved for implementation.
- ii. The flight time limit of 12 consecutive calendar month would be subject to compliance with FRMS and the flight time may be restricted between 900 & 1000 hours of flight time depending on extent of compliance with FRMS requirements. Such Scheme shall be defined in the operations manual of the operator and requires approval by BCAA.
- iii. In the case of adoption of only prescriptive type and FRMS not approved for implementation, the maximum flight time shall be limited to 900 hours in any 12 consecutive calendar months.

**AERONAUTICAL CIRCULAR – AC/ALD·GEN/02/2020 (CONTD...)**

The implementation of revised regulation should start with the application of prescriptive scheme initially. In the case where operator desires to implement full FRMS, sufficient data should be gathered over a period of 9 to 12 months based on the application of appropriate scientific methodology for Fatigue Hazard Identification and measures for Fatigue Risk Management. Subsequently, the request should be put up to Bahrain CAA for approval of Fatigue Risk Management Scheme. Such a request should be supported by the data gathered over period of time while preparing for FRMS approval. Based on adequacy of data and the robustness of the system, the Fatigue Risk Management Scheme may be approved by Bahrain CAA. Such a scheme would be included in the Operator's Operations Manual and submitted to BCAA for review and approval if found satisfactory.

The implementation of the new FTL requirement with prescriptive system comes into force on 15<sup>th</sup> January 2020. However, operator is required to carryout gap analysis and to implement the changes in operator's Operations Manual as well in FTL monitoring system being used by them as applicable. Necessary changes to Operations Manual may be carried out within 6 weeks and the same be submitted to BCAA for approval. The amendments to Operations Manual shall be supported with the reports of gap analysis.

Requests for FRMS implementation would be considered after September 2020, only when an appropriate bio mathematical model selected, procedure as acceptable to BCAA is defined, sufficient data gathered, detailed review & analysis carried out for implementation by the operator. Such a request shall be based on submission of application as per the requirement at Subpart Q and guidance given in CAP 34, Handbook & Process Guide and satisfying thereof.

  
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Undersecretary for Civil Aviation Affairs

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