



Australian Government
Civil Aviation Safety Authority

SUMMARY OF CONSULTATION



Draft CAAP 48-01 v3.0– Fatigue management for flight crew members



Date November 2019
File ref D19/346434

About this consultation

We sought feedback on Draft CAAP 48-01 v3.0 – Fatigue management for flight crew members from 16 August to 1 September 2019. This version of the CAAP aligns CASA guidance with changes introduced in CAO 48.1 Instrument 2019 and incorporates recommendations of the independent review team.

Respondents

We received a total of 10 submissions. Five respondents consented to having their comments published (see below), and five indicated that their views officially represented those of an organisation.

Key feedback

The table below summarises key feedback received and CASA's response.

Feedback	CASA Response / Action
General comments on CAO 48.1 instrument 2019, rather than draft CAAP 48-01 v3.0.	These comments have been sent to the relevant subject matter experts.
Comment on the "WOCL" definition.	Extensive consultation was conducted regarding limits on infringing the window of circadian low (WOCL) and the WOCL definition. We do not consider that further changes to the WOCL definition are appropriate at this stage.
Samn-Perelli Scale and/or PVT tests should be completed by all FCMs on each flight.	We acknowledge that both the Samn-Perelli Scale and/or PVT tests are useful tools to assess alertness in the cockpit. However, there is insufficient evidence to support their use for every flight crew member on every flight duty period they undertake.
Clarification of requirements and responsibilities for FCMs who undertake either recreational or non-recreational private operations during their off-duty periods	We have amended the CAAP to clarify the requirements and responsibilities for FCMs who undertake either recreational or non-recreational private operations.
Some general comments regarding "Open and fair reporting culture".	We have considered the comments and are comfortable that the CAAP appropriately addresses this topic.
The CAAP may require amending (together with the regulation) over time if operators identify issues that don't allow enough operational flexibility in some circumstances.	We intend to monitor and review both the CAAP and regulation as per the actions resulting from the Independent Review of Fatigue: Action 25-1 Fatigue surveys 1) CASA will survey industry to establish a fatigue baseline, assess the impact of fatigue rules and identify further continuous improvement opportunities, and

Feedback	CASA Response / Action
	<p>2) Action 25-4 Monitor fatigue data and international trends</p> <p>CASA will monitor data from fatigue surveys and fatigue reporting in conjunction with changes in international rules to inform future changes to prescriptive limits.</p>

Additional Feedback

Two respondents, who did not provide consent for their feedback to be published, proposed several minor editorial changes to Draft CAAP 48-01 v3.0. CASA has considered the feedback and consequently incorporated appropriate revisions in the emendations to CAAP sections, including but not limited to: 2.1, 2.5, 3.1, 3.2, 4.5, 4.7, 4.8, 5.2, 5.3.

Future Outcome

[CAAP 48-01 – Fatigue management for flight crew members](#) has been updated in response to feedback and is now available on the CASA website. We anticipate that there will be additional feedback as operators prepare to transition to the new fatigue rules. To address this, we will reopen public consultation on CAAP 48-01 v3.0 during the transition period. Additionally, we intend to conduct ongoing monitoring of the new fatigue rules and guidance material via online surveys and other research initiatives.

Published Responses

[View submitted responses](#) where consent has been given to publish the response.