



## **Comparison Document Between EU Commission Regulation and EASA Decision on Flight Time Limitations, and CAP 371 Edition 4**

**WARNING: THE DETAILS CONTAINED IN THIS DOCUMENT ARE SUBJECT TO CHANGE AND ARE NOT TO BE CONSIDERED A FINAL OR LEGALLY BINDING DOCUMENT**

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<p><b>Objective and Scope</b></p>		
<p>The Air Navigation Order 2009, Part VI, as amended, requires that the operator of an aircraft to which the Air Navigation Order applies shall have a scheme for the regulation of flight times of crew. The scheme must be approved by the Civil Aviation Authority (CAA) and included in the Company Operations Manual or, when an Operations Manual is not required by the Order, incorporated in a separate document. The Operations Manual, or separate document, shall be readily available to every person employed by the operator as a member of an aircraft crew.</p> <p><b>Section A, paragraph 4.2</b></p> <p>Approved changes must be brought to the attention of crew members by incorporation into the Operations Manual, or other suitable operating instructions.</p>	<p><b>ORO.FTL.125 FLIGHT TIME SPECIFICATION SCHEMES</b></p> <p>(a) Operators shall establish, implement and maintain flight time specification schemes that are appropriate for the type(s) of operation performed and that comply with Regulation (EC) No. 216/2008, this Subpart and other applicable legislation, including Directive 2000/79/EC.</p> <p>(b) Before being implemented, flight time specification schemes, including any related FRM where required, shall be approved by the competent authority.</p> <p>(c) To demonstrate compliance with Regulation (EC) No. 216/2008 and this Subpart, the operator shall apply the applicable certification specifications adopted by the Agency. Alternatively, if the operator wants to deviate from those certification specifications in accordance with Article 22(2) of Regulation (EC) No. 216/2008, it shall provide the competent authority with a full description of the intended deviation prior to implementing it. The description shall include any revisions to manuals or procedures that may be relevant, as well as an assessment demonstrating that the requirements of Regulation (EC) No. 216/2008 and of this Subpart are met.</p> <p>(d) For the purpose of point ARO.OPS.235(d), within 2 years of the implementation of a deviation or derogation, the operator shall collect data concerning the granted deviation or derogation and analyse that data using scientific principles with a view to assessing the effects of the deviation or derogation on aircrew fatigue. Such analysis shall be provided in the form of a report to the competent authority.</p>	<p>Fatigue management training, as part of an Operator's SMS, required for approval of FTL scheme.</p> <p>FRMS, where appropriate, needs to be implemented and approved.</p> <p>Deviations or derogations require Operator to provide data analysis and feedback regarding effects on aircrew fatigue.</p> <p>Three years after the application date a review of the regulations will be undertaken using scientific expertise, based on operational data gathered.</p>

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<p><b>Section A, paragraph 2.2</b></p> <p>Planned schedules must allow for flights to be completed within the maximum permitted flying duty period. The CAA, when assessing the planning of a schedule will take into account the time allowed for pre-flight duties, taxiing, the flight and turnaround times.</p>	<p><b>ORO.FTL.110 OPERATOR RESPONSIBILITIES</b></p> <p>An operator shall:</p> <ul style="list-style-type: none"> <li>(i) plan flight duties in order to be completed within the allowable flight duty period taking into account the time necessary for pre-flight duties, the sector and turnaround times;</li> <li>(j) change a schedule and/or crew arrangements if the actual operation exceeds the maximum flight duty period on more than 33% of the flight duties in that schedule during a scheduled seasonal period.</li> </ul>	<p>In contrast to guidance provided in CAP 371, new regulations are mandatory, enforceable under European legislation.</p> <p>Responsibility placed on Operator to monitor exceedances on FDPs and change schedules if appropriate.</p>

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<p><b>Section A, paragraph 3.1</b></p> <p>It is the responsibility of the operator to prepare rosters sufficiently in advance to provide the opportunity for crew members to plan adequate rest. Operators must therefore establish minimum periods of notification of duty or, where this is not practicable due to the nature of the operation, must establish in advance minimum periods of notification of days off.</p> <p><b>Section C, Annex A, paragraph 4.1</b></p> <p>Crew members will normally be given at least 7 days' notice of days off.</p>	<p><b>ORO.FTL.110 OPERATOR RESPONSIBILITIES</b></p> <p>An operator shall:</p> <ul style="list-style-type: none"> <li>(a) publish duty rosters sufficiently in advance to provide the opportunity for crew members to plan adequate rest;</li> <li>(b) ensure that flight duty periods are planned in a way that enables crew members to remain sufficiently free from fatigue so that they can operate to a satisfactory level of safety under all circumstances;</li> <li>(c) specify reporting times that allow sufficient time for ground duties;</li> <li>(d) take into account the relationship between the frequency and pattern of flight duty periods and rest periods and give consideration to the cumulative effects of undertaking long duty hours combined with minimum rest periods;</li> <li>(e) allocate duty patterns which avoid practices that cause a serious disruption of an established sleep/work pattern, such as alternating day/night duties;</li> <li>(f) comply with the provisions concerning disruptive schedules in accordance with ARO.OPS.230;</li> <li>(g) provide rest periods of sufficient time to enable crew members to overcome the effects of the previous duties and to be rested by the start of the following flight duty period;</li> <li>(h) plan recurrent extended recovery rest periods and notify crew members sufficiently in advance;</li> </ul> <p><b>AMC1 ORO.FTL.110(a) Operator responsibilities</b></p> <p><b>PUBLICATION OF ROSTERS</b></p> <p>Rosters should be published 14 days in advance.</p>	<p>In contrast to guidance provided in CAP 371, new regulations are mandatory, enforceable under European legislation.</p> <p>Operators to plan FDPs with a focus on fatigue management.</p>

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<b>Operator's responsibilities</b>		
<p><b>Section A, paragraph 2.1</b></p> <p>Operators are expected to appreciate the relationship between the frequency and pattern of scheduled flying duty periods and rest periods and time off, giving due consideration to the cumulative effects of working long hours interspersed with minimum rest.</p>	<p><b>ORO.FTL.110 OPERATOR RESPONSIBILITIES</b></p> <p>An operator shall:</p> <p>(d) take into account the relationship between the frequency and pattern of flight duty periods and rest periods and give consideration to the cumulative effects of undertaking long duty hours combined with minimum rest periods;</p>	<p>In contrast to guidance provided in CAP 371, new regulations are mandatory, enforceable under European legislation.</p> <p>More clearly defined responsibility of Operator to recognise effects of long hours and minimum rest periods.</p>
<p><b>Section A, paragraph 2.3</b></p> <p>Other factors to be considered when planning duty periods include:</p> <p>(a) the allocation of work patterns which avoid such undesirable practices as alternating day/night duties, the positioning of crew so that a serious disruption of established sleep/work patterns occur, or scheduling rest periods of between 18 and 30 hours especially after long flights crossing many time zones;</p> <p>(b) planning days off and notifying crew well in advance;</p>	<p><b>ORO.FTL.110 OPERATOR RESPONSIBILITIES</b></p> <p>An operator shall:</p> <p>(e) allocate duty patterns which avoid practices that cause a serious disruption of an established sleep/work pattern, such as alternating day/night duties;</p> <p>(f) comply with the provisions concerning disruptive schedules in accordance with ARO.OPS.230;</p>	<p>In contrast to guidance provided in CAP 371, new regulations are mandatory, enforceable under European legislation.</p> <p>Defined responsibility of Operator to appreciate disruptive schedules when allocating duty patterns.</p>

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<p><b>Section A, paragraph 2.3(c)</b></p> <p>Consultation between operators and crew to agree basic roster concepts which ensure adequate rest prior to flight but, within that constraint, takes account of the commercial requirements of the company.</p>	<p><b>ORO.FTL.235 REST PERIODS</b></p> <p>(e) Flight time specification schemes shall specify additional rest periods in accordance with the applicable certification specifications to compensate for:</p> <ol style="list-style-type: none"> <li>(1) the effects of time zone differences and extensions of the FDP;</li> <li>(2) additional cumulative fatigue due to disruptive schedules; and</li> <li>(3) a change of home base.</li> </ol> <p><b>CS FTL.1.235 Rest periods</b></p> <p>(b) Time zone differences</p> <ol style="list-style-type: none"> <li>(2) The operator monitors rotations and combinations of rotations in terms of their effect on crew member fatigue, and adapts the rosters as necessary.</li> </ol> <p><b>AMC1 ORO.FTL.110 Operator responsibilities</b></p> <p><b>SCHEDULING</b></p> <p>(a) Scheduling has an important impact on a crew member's ability to sleep and to maintain a proper level of alertness. When developing a workable roster, the operator should strike a fair balance between the commercial needs and the capacity of individual crew members to work effectively. Rosters should be developed in such a way that they distribute the amount of work evenly among those that are involved.</p>	<p>In contrast to guidance provided in CAP 371, new regulations are mandatory, enforceable under European legislation.</p> <p>Established need for operator to monitor schedules and emphasis on how crew fatigue is affected.</p>

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<p><b>Section A, paragraph 2.1</b></p> <p>The prime objective of an FTL Scheme is to ensure that crew members are adequately rested and whilst flying be sufficiently free from fatigue so that they can operate to a satisfactory level of efficiency and safety in all normal and abnormal situations.</p> <p><b>Section A, paragraph 2.3</b></p> <p>Other factors to be considered when planning duty periods include:</p> <ul style="list-style-type: none"> <li>(a) the allocation of work patterns which avoid such undesirable practices as alternating day/night duties, the positioning of crew so that a serious disruption of established sleep/work patterns occur, or scheduling rest periods of between 18 and 30 hours especially after long flights crossing many time zones;</li> <li>(b) planning days off and notifying crew well in advance;</li> <li>(c) consultation between operators and crew to agree basic roster concepts which ensure adequate rest prior to flight but, within that constraint, takes account of the commercial requirements of the company.</li> </ul> <p><b>Section A, paragraph 3.1</b></p> <p>Training for Rostering Staff must include guidance on the effects of disturbing Circadian Rhythms, and sleep deprivation. Away from base, the operator must provide for crew members both the opportunity and facilities for adequate pre-flight rest, in suitable accommodation.</p>	<p><b>ORO.FTL.110 OPERATOR RESPONSIBILITIES</b></p> <p>An operator shall:</p> <ul style="list-style-type: none"> <li>(b) ensure that flight duty periods are planned in a way that enables crew members to remain sufficiently free from fatigue so that they can operate to a satisfactory level of safety under all circumstances;</li> </ul> <p><b>ORO.FTL.250 FATIGUE MANAGEMENT TRAINING</b></p> <ul style="list-style-type: none"> <li>(a) The operator shall provide initial and recurrent fatigue management training to crew members, personnel responsible for preparation and maintenance of crew rosters and management personnel concerned.</li> <li>(b) This training shall follow a training programme established by the operator and described in the operations manual. The training syllabus shall cover the possible causes and effects of fatigue and fatigue countermeasure.</li> </ul>	<p>In contrast to guidance provided in CAP 371, new regulations are mandatory, enforceable under European legislation.</p> <p>Comprehensive move towards the management of fatigue and analysis of hazards and risk mitigation.</p> <p>Ongoing fatigue management training compulsory for wide range of personnel and syllabus to cover effects and mitigations.</p>

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<b>Crew Member's responsibilities</b>		
<p><b>ANO 2009 Article 149</b></p> <p>The operator of an EU-OPS aeroplane must not cause or permit that aeroplane to make a commercial air transport flight unless:</p> <p>(a) the scheme for the regulation of flight times required under EU-OPS has been approved by the CAA; and</p> <p>(b) the operator has taken all such steps as are reasonably practicable to ensure that the provisions of the scheme will be complied with in relation to every person flying in that aeroplane as a member of its crew.</p> <p><b>Section A, paragraph 1.3</b></p> <p>In essence, the Air Navigation Order requires that a crew member shall not fly, and an operator shall not require him to fly, if either has reason to believe that he is suffering, or is likely to suffer while flying, from such fatigue as may endanger the safety of the aircraft or of its occupants.</p>	<p><b>ORO.FTL.115 CREW MEMBER RESPONSIBILITIES</b></p> <p>Crew members shall:</p> <p>(a) comply with point CAT.GEN.MPA.100(b) of Annex IV (Part-CAT); and</p> <p>(b) make optimum use of the opportunities and facilities for rest provided and plan and use their rest periods properly.</p> <p><b>ORO.FTL.205 FLIGHT DUTY PERIOD (FDP)</b></p> <p>(a) The operator shall:</p> <p>(2) establish procedures specifying how the commander shall, in case of special circumstances which could lead to severe fatigue, and after consultation with the crew members concerned, reduce the actual FDP and/or increase the rest period in order to eliminate any detrimental effect on flight safety.</p>	<p>Defined ability of commander to reduce FDP if fatigue risk is identified.</p>
<p><b>Section A, paragraph 3.2</b></p> <p>All crew members shall make optimum use of the opportunities and facilities for rest provided, and plan and use their rest periods properly. Before considering additional employment crew members must recognise that the responsibility for being sufficiently rested before undertaking a flying duty remains with the individual. Crew members are also reminded that persons are not entitled to act as a member of the crew of an aircraft registered in the United Kingdom if the individuals know or suspect that their physical or mental condition renders them temporarily unfit so to act.</p>	<p><b>ORO.FTL.115 CREW MEMBER RESPONSIBILITIES</b></p> <p>Crew members shall:</p> <p>(a) comply with point CAT.GEN.MPA.100(b) of Annex IV (Part-CAT); and</p> <p>(b) make optimum use of the opportunities and facilities for rest provided and plan and use their rest periods properly.</p>	<p>In contrast to guidance provided in CAP 371, new regulations are mandatory, enforceable under European legislation.</p>

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<b>Responsibilities of Civil Aviation Authorities</b>		
<b>Variations</b>		
<p><b>Section A, paragraph 4.2</b></p> <p>Although operators must plan their schemes in accordance with the requirements, it is recognised that the standard provisions will not necessarily satisfy every type of operation. In these circumstances operators may apply for a change to the standard provisions.</p> <p><b>Section A, paragraph 2.3(c)</b></p> <p>Consultation between operators and crew to agree basic roster concepts which ensure adequate rest prior to flight but, within that constraint, takes account of the commercial requirements of the company.</p>	<p><b>ORO.FTL.125 FLIGHT TIME SPECIFICATION SCHEMES</b></p> <p>(c) To demonstrate compliance with Regulation (EC) No. 216/2008 and this Subpart, the operator shall apply the applicable certification specifications adopted by the Agency. Alternatively, if the operator wants to deviate from those certification specifications in accordance with Article 22(2) of Regulation (EC) No. 216/2008, it shall provide the competent authority with a full description of the intended deviation prior to implementing it. ...</p> <p>(d) For the purpose of point ARO.OPS.235(d), within 2 years of the implementation of a deviation or derogation, the operator shall collect data concerning the granted deviation or derogation and analyse that data using scientific principles with a view to assessing the effects of the deviation or derogation on aircrew fatigue. Such analysis shall be provided in the form of a report to the competent authority.</p> <p><b>AMC1 ORO.FTL.110 Operator responsibilities</b></p> <p><b>SCHEDULING</b></p> <p>(a) Scheduling has an important impact on a crew member's ability to sleep and to maintain a proper level of alertness. When developing a workable roster, the operator should strike a fair balance between the commercial needs and the capacity of individual crew members to work effectively. Rosters should be developed in such a way that they distribute the amount of work evenly among those that are involved.</p>	<p>Ongoing analysis and feedback for deviations necessary for approval by competent authority.</p> <p>Operator responsibility to address impact a roster can have on the ability of a crew member to operate effectively.</p>

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<p><b>Section A, paragraph 4.2</b></p> <p>Approval [for a change to the standard provisions] will only be given where an operator can show that his proposal will ensure a better or equivalent level of protection against fatigue than the basic requirements. Approved changes must be brought to the attention of crew members by incorporation into the Operations Manual, or other suitable operating instructions.</p>	<p><b>ORO.FTL.125 FLIGHT TIME SPECIFICATION SCHEMES</b></p> <p>(a) Operators shall establish, implement and maintain flight time specification schemes that are appropriate for the type(s) of operation performed and that comply with Regulation (EC) No. 216/2008, this Subpart and other applicable legislation, including Directive 2000/79/EC.</p> <p>(b) Before being implemented, flight time specification schemes, including any related FRM where required, shall be approved by the competent authority.</p> <p><b>AMC2 ORO.FTL.120(b)(2) Fatigue Risk Management (FRM)</b></p> <p>COMMERCIAL AIR TRANSPORT OPERATORS' FRM DOCUMENTATION</p> <p>The operator should develop and keep current FRM documentation that describes and records:</p> <p>(a) FRM policy and objectives;</p> <p>(b) FRM processes and procedures;</p> <p>(c) accountabilities, responsibilities and authorities for these processes and procedures;</p> <p>(d) mechanisms for on-going involvement of management, flight and cabin crew members, and all other involved personnel;</p> <p>(e) FRM training programmes, training requirements and attendance records;</p> <p>(f) scheduled and actual flight times, duty periods and rest periods with deviations and reasons for deviations; and</p> <p>(g) FRM outputs including findings from collected data, recommendations, and actions taken.</p>	<p>Operator required to supply documented proof of comprehensive FRM policies as part of the scheme.</p> <p>Clear requirements of what the Operator must do in order to obtain deviations.</p>

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<b>DEFINITIONS</b>	<b>ORO.FTL.105 DEFINITIONS</b>	
<b>Acclimatised</b>		
<p><b>Section B, Definitions 1</b></p> <p>When a crew member has spent 3 consecutive local nights on the ground within a time zone which is 2 hours wide, and is able to take uninterrupted night's sleep. The crew member will remain acclimatised thereafter until a duty period finishes at a place where local time differs by more than 2 hours from that at the point of departure.</p>	<p>1) 'acclimatised' means a state in which a crew member's circadian biological clock is synchronised to the time zone where the crew member is. A crew member is considered to be acclimatised to a 2-hour wide time zone surrounding the local time at the point of departure. When the local time at the place where a duty commences differs by more than 2 hours from the local time at the place where the next duty starts, the crew member, for the calculation of the maximum daily flight duty period, is considered to be acclimatised in accordance with the values in the Table 1.</p>	<p>More in-depth detail for calculation of acclimatisation.</p>
<b>Augmented Flight Crew</b>		
<p>No definition given.</p>	<p>(5) 'augmented flight crew' means a flight crew which comprises more than the minimum number required to operate the aircraft, allowing each flight crew member to leave the assigned post, for the purpose of in-flight rest, and to be replaced by another appropriately qualified flight crew member;</p>	<p>No comparable definition given in CAP 371.</p>
<b>Block Time</b>		
<p><b>ANO 2009, Article 256</b></p> <p>(1) An aircraft is deemed to be in flight:</p> <p>(a) in the case of a piloted flying machine, from the moment when, after the embarkation of its crew for the purpose of taking off, it first moves under its own power, until the moment when it next comes to rest after landing;</p>	<p>(13) 'flight time' means, for aeroplanes and touring motor gliders, the time between an aircraft first moving from its parking place for the purpose of taking off until it comes to rest on the designated parking position and all engines or propellers are shut down.</p>	<p>Definition changed to time of pushback, aligning with the Civil Aviation (Working Time) Regulations 2010 interpretation.</p>

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<b>Break</b>		
<p><b>Section B, Definitions 20</b></p> <p>Split Duty - A flying duty period which consists of two or more sectors, separated by less than a minimum rest period.</p>	<p>(6) 'break' means a period of time within a flight duty period, shorter than a rest period, counting as duty and during which a crew member is free of all tasks.</p>	<p>Under new regulations 'break' refers to in-flight rest / split duty during a duty period. No definition of in-flight rest given in CAP 371.</p>
<b>Cabin Crew</b>		
<p><b>Section C, Annex A, paragraph 5.2</b></p> <p>A person employed to facilitate the safety of passengers, whose duties are detailed by the company or the aircraft commander. Such persons will not act as a member of the flight crew.</p>	<p>No definition given.</p>	<p>No definition given in new regulations.</p>
<b>Contactable</b>		
<p><b>Section B, Definitions 2</b></p> <p>A short period of time during the day, other than on a 'day off', during which the company requires a crew member to be at an agreed location for the purpose of giving notification of a duty period which will commence not less than ten hours ahead. The contactable period will be between [*] and [*] local time and shall not exceed 2½ hours.</p> <p>* Times to be inserted by the company. If required, the 2½ hours can be split into 2 separate periods. Such arrangements must be agreed by the CAA.</p>	<p>(20) 'reserve' means a period of time during which a crew member is required by the operator to be available to receive an assignment for an FDP, positioning or other duty notified at least 10 hours in advance.</p>	<p>Reserve definition is the comparable requirement.</p>

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<b>Crew</b>		
<p><b>Section C, Annex A, paragraph 5.4</b></p> <p>A member of the flight crew or cabin crew.</p>	No definition given.	No definition provided in new regulations.
<b>Days Off</b>		
<p><b>Section B, Definitions 4</b></p> <p>Periods available for leisure and relaxation free from all duties. A single day off shall include 2 local nights. Consecutive days off shall include a further local night for each additional consecutive day off. A rest period may be included as part of a day off.</p>	<p><b>ORO.FTL.235 REST PERIODS</b></p> <p>d) Recurrent extended recovery rest periods</p> <p>Flight time specification schemes shall specify recurrent extended recovery rest periods to compensate for cumulative fatigue. The minimum recurrent extended recovery rest period shall be 36 hours, including 2 local nights, and in any case the time between the end of one recurrent extended recovery rest period and the start of the next extended recovery rest period shall not be more than 168 hours. The recurrent extended recovery rest period shall be increased to 2 local days twice every month.</p>	<p>Although no reference to days off in EASA regulations, extended recovery rest ensures rest allocated to crew.</p> <p>UK Working Time Directive also ensures the 96 days off in a year.</p>
<b>Dispatch Crew</b>		
<p><b>Section B, Definitions 5</b></p> <p>A fully qualified and current flight/cabin crew member authorised to carry out pre-flight duties as defined by an operator.</p>	No definition given.	<p>No reference to dispatch crew made in new regulations.</p> <p>The CAA no longer allows the use of dispatch crews for operation.</p>

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<b>Duty</b>		
<p><b>Section B, Definitions 6</b></p> <p>Any continuous period during which a crew member is required to carry out any task associated with the business of an aircraft operator.</p> <p>See CAP 371, Section B, paragraph 22.3(b) for accountability of Standby duty.</p>	(10) 'duty' means any task that a crew member performs for the operator, including flight duty, administrative work, giving or receiving training and checking, positioning, and some elements of standby.	More in-depth definition provided.
<b>Duty Period</b>		
No definition given.	(11) 'duty period' means a period which starts when a crew member is required by an operator to report for or to commence a duty and ends when that person is free of all duties, including post-flight duty.	No definition provided in CAP 371.
<b>Early Start Duty</b>		
<p><b>Section B, Definitions 7</b></p> <p>A duty is an Early Start Duty if it commences in the period 05:00 to 06:59 hours local time.</p>	<p>(8) 'disruptive schedule' means a crew member's roster which disrupts the sleep opportunity during the optimal sleep time window by compromising an FDP or a combination of FDPs which encroach, start or finish during any portion of the day or of the night where a crew member is acclimatised. A schedule may be disruptive due to early starts, late finishes or night duties.</p> <p>(b) 'late type' of disruptive schedule means:</p> <p>(i) for 'early start' a duty period starting in the period between 05:00 and 06:59 in the time zone to which a crew member is acclimatised.</p>	The UK will fall into a 'late type' category, hence the definition is given accordingly.

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<b>Flight Crew</b>		
<p><b>Section C, Annex A, paragraph 5.9</b></p> <p>Those members of the crew of an aircraft who act as a pilot or flight engineer.</p>	No definition given.	No definition given in the new regulations.
<b>Flight Duty Period</b>		
<p><b>Section B, Definitions 8</b></p> <p>Any time during which a person operates in an aircraft as a member of its crew. It starts when the crew member is required by an operator to report for a flight, and finishes at on-chocks or engines off, or rotors stopped, on the final sector.</p>	(12) 'flight duty period ('FDP')' means a period that commences when a crew member is required to report for duty, which includes a sector or a series of sectors, and finishes when the aircraft finally comes to rest and the engines are shut down, at the end of the last sector on which the crew member acts as an operating crew member.	More detailed definition provided.
<b>Home Base</b>		
<p><b>Secton B, paragraph 17</b></p> <p>Rest periods refers to "home base".</p> <p><b>Section B, paragraph 9</b></p> <p>Travelling time refers to "Normal departure aerodrome".</p>	(14) 'home base' means the location, assigned by the operator to the crew member, from where the crew member normally starts and ends a duty period or a series of duty periods and where, under normal circumstances, the operator is not responsible for the accommodation of the crew member concerned.	In contrast to guidance provided in CAP 371, new regulations are mandatory, enforceable under European legislation.

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<b>Late Finish Duty</b>		
<p><b>Section B, Definitions 9</b></p> <p>A duty is a Late Finish when the duty finishes in the period 01:00 to 01:59 hours local time.</p>	<p>(8) 'disruptive schedule' means a crew member's roster which disrupts the sleep opportunity during the optimal sleep time window by compromising an FDP or a combination of FDPs which encroach, start or finish during any portion of the day or of the night where a crew member is acclimatised. A schedule may be disruptive due to early starts, late finishes or night duties.</p> <p>(b) 'late type' of disruptive schedule means:</p> <p>(ii) for 'late finish' a duty period finishing in the period between 00:00 and 01:59 in the time zone to which a crew member is acclimatised.</p>	<p>The UK will fall into a 'late type' category, hence the definition is given accordingly.</p>
<b>Local Day</b>		
No definition given.	(15) 'local day' means a 24-hour period commencing at 00:00 local time.	No definition provided in CAP 371.
<b>Local Night</b>		
<p><b>Section B, Definitions 10</b></p> <p>A period of 8 hours falling between 22:00 and 08:00 hours local time.</p>	(16) 'local night' means a period of 8 hours falling between 22:00 and 08:00 local time.	
<b>Night Duty</b>		
<p><b>Section B, Definitions 11</b></p> <p>A duty is a Night Duty if any part of that duty falls within the period 02:00 to 04:59 hours local time.</p>	(28) 'window of circadian low ('WOCL')' means the period between 02:00 and 05:59 hours in the time zone to which a crew member is acclimatised.	<p>Although night duty not defined in new regulations, a clear definition of WOCL is now provided.</p>

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<b>Positioning</b>		
<p><b>Section B, Definitions 12</b></p> <p>The practice of transferring crew from place to place as passengers in surface or air transport at the behest of an operator.</p>	<p>(18) 'positioning' means the transferring of a non-operating crew member from one place to another, at the behest of the operator, excluding:</p> <ul style="list-style-type: none"> <li>- the time of travel from a private place of rest to the designated reporting place at home base and vice versa, and</li> <li>- the time for local transfer from a place of rest to the commencement of duty and vice versa.</li> </ul>	<p>Clarity provided in new definition.</p>
<b>Regular</b>		
<p><b>Section B, Definitions 13</b></p> <p>Regular, when applied to duties that are Late Finishes, Night or Early Starts, means a run of 4 or 5 consecutive duties, not broken by a period of 34 hours free from such duties, contained in a single 7 consecutive day period.</p>	<p>No definition given.</p>	<p>No comparative definition given in new regulations.</p>
<b>A Single Day Free of Duty</b>		
<p><b>Section B, paragraph 20.2</b></p> <p>A single day off shall include 2 local nights, and shall be of at least 34 hours' duration.</p>	<p>(23) 'single day free of duty' means, for the purpose of complying with the provisions of Council Directive 2000/79/EC, a time free of all duties and standby consisting of one day and two local nights, which is notified in advance. A rest period may be included as part of the single day free of duty.</p>	<p>Clarity provided in new definition.</p> <p>New regulations refer to extended recovery days and not days off.</p>
<b>Operating Crew Member</b>		
<p>Only comparable definition is for 'Dispatch Crew' (Section B, Definitions 5) - A fully qualified and current flight/cabin crew member authorised to carry out pre-flight duties as defined by an operator.</p>	<p>(17) 'operating crew member' means a crew member carrying out duties in an aircraft during a sector.</p>	<p>No comparable definition given in CAP 371.</p>

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<b>Reserve</b>		
No definition given.	(20) 'reserve' means a period of time during which a crew member is required by the operator to be available to receive an assignment for an FDP, positioning or other duty notified at least 10 hours in advance.	No definition given in CAP 371.
<b>Reporting Time</b>		
<b>Section B, Definitions 14</b> The time at which a crew member is required by an operator to report for any duty.	No definition given.	No definition in new regulations.
<b>Rest Period</b>		
<b>Section B, Definitions 15</b> A (uninterrupted) period of time before starting a flying duty period which is designed to give crew members adequate opportunity to rest before a flight.	(21) 'rest period' means a continuous, uninterrupted and defined period of time, following duty or prior to duty, during which a crew member is free of all duties, standby and reserve.	Clarity provided in new definition.
<b>Rostered/Planned Duty</b>		
<b>Section B, Definitions 16</b> A duty period, or series of duty periods, with stipulated start and finish times, notified by the company to crew in advance.	No definition given.	No definition given in new regulations.
<b>Rostering Period</b>		
<b>Section B, Definitions 17</b> A number of consecutive weeks, usually 4, but defined by the operator.	No definition given.	No definition given in new regulations.

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<b>Scheduled Duty</b>		
<p><b>Section B, Definitions 18</b></p> <p>The allocation of a specific flight or flights or other duties to a crew member within the pre-notified rostered/planned series of duty periods.</p>	No definition given.	No definition given in new regulations.
<b>Sector</b>		
<p><b>Section B, Definitions 19</b></p> <p>The time between an aircraft first moving under its own power until it next comes to rest after landing, on the designated parking position.</p>	(24) 'sector' means the segment of an FDP between an aircraft first moving for the purpose of taking off until it comes to rest after landing on the designated parking position.	New definition represents sector more in terms of block time.
<b>Split Duty</b>		
<p><b>Section B, Definitions 20</b></p> <p>A flying duty period which consists of two or more sectors, separated by less than a minimum rest period.</p>	No definition given.	No specific definition given here in new regulations.
<b>Standby Duty</b>		
<p><b>Section B, Definitions 21</b></p> <p>A period during which an operator places restraints on a crew member who would otherwise be off duty. However, it shall not include any time during which an operator requires a crew member to be contactable for the purpose of giving notification of a duty which is due to start 10 hours or more ahead.</p>	(25) 'standby' means a pre-notified and defined period of time during which a crew member is required by the operator to be available to receive an assignment for a flight, positioning or other duty without an intervening rest period.	

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<b>Suitable Accommodation</b>		
<p><b>Section B, Definitions 22</b></p> <p>A well furnished bedroom which is subject to minimum noise, is well ventilated, and has the facility to control the levels of light and temperature.</p>	<p>(4) 'suitable accommodation' means, for the purpose of standby, split duty and rest, a separate room for each crew member located in a quiet environment and equipped with a bed, which is sufficiently ventilated, has a device for regulating temperature and light intensity, and access to food and drink.</p>	<p>More detailed definition in the new regulations and reference made to nutrition.</p>
<b>Travelling</b>		
<p><b>Section B, Definitions 23</b></p> <p>All time spent by a crew member transitting between the place of rest, and the place of reporting for duty.</p>	<p>No definition given.</p>	<p>No definition given in new regulations.</p>
<b>Week</b>		
<p><b>Section B, Definitions 24</b></p> <p>A period of 7 consecutive days starting at any set time and on any set day as specified and stated by the operator.</p>	<p>No definition given.</p>	<p>No definition given in the new regulations.</p>
<b>Window of Circadian Low (WOCL)</b>		
<p>Not definition given.</p>	<p>(28) 'window of circadian low ('WOCL') means the period between 02:00 and 05:59 hours in the time zone to which a crew member is acclimatised.</p>	<p>No definition provided in CAP 371.</p>

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<b>Flight and Duty Limitations Cumulative Duty Hours</b>		
<p><b>Section B, paragraph 22.1</b></p> <p>The maximum duty hours for flight crew will not exceed:</p> <p>55 hours in any 7 consecutive days, but may be increased to 60 hours when a rostered duty covering a series of duty periods has commenced and is subject to unforeseen delays;</p> <p>95 hours in any 14 consecutive days; and,</p> <p>190 hours in any 28 consecutive days.</p> <p><b>Section B, paragraph 24.2</b></p> <p>The limitations which shall be applied to cabin crew are those applicable to flight crew members contained in paragraphs 6 to 23, but with the following differences:</p> <p>(d) The maximum duty hours for cabin crew shall not exceed:</p> <p>60 hours in any 7 consecutive days, but may be increased to 65 hours when a rostered duty covering a series of duty periods, once commenced, is subject to unforeseen delays.</p> <p>105 hours in any 14 consecutive days.</p> <p>210 hours in any 28 consecutive days.</p>	<p><b>ORO.FTL.210 FLIGHT TIMES AND DUTY PERIODS</b></p> <p>(a) The total duty periods to which a crew member may be assigned shall not exceed:</p> <p>(1) 60 duty hours in any 7 consecutive days;</p> <p>(2) 110 duty hours in any 14 consecutive days; and</p> <p>(3) 190 duty hours in any 28 consecutive days, spread as evenly as practicable throughout that period.</p> <p>(b) The total flight time of the sectors on which an individual crew member is assigned as an operating crew member shall not exceed:</p> <p>(1) 100 hours of flight time in any 28 consecutive days;</p> <p>(2) 900 hours of flight time in any calendar year; and</p> <p>(3) 1 000 hours of flight time in any 12 consecutive calendar months.</p> <p>(c) Post-flight duty shall count as duty period. The operator shall specify in its operations manual the minimum time period for post-flight duties.</p>	<p>Alignment of flight crew and cabin crew duty limits.</p> <p>Increase to 1,000-hour flying time in 12 consecutive calendar months.</p> <p>UK Civil Aviation Working Time regulations will limit flying hours to 900 in a 12-month period.</p> <p>In CAP 371, maximum duty hours are capped by common 900 / 2000 hour maxima.</p>
<b>Calculation of Cumulative Duty Hours</b>		
<p><b>Section B, paragraph 22.3</b></p> <p>Duty hours shall be added to cumulative totals in accordance with the following:</p>	<p><b>ORO.FTL.225 STANDBY AND DUTIES AT THE AIRPORT</b></p> <p>If an operator assigns crew members to standby or to any duty at the airport, the following shall apply in accordance with the</p>	<p>Cap of 16 hours FDP applied.</p> <p>UK Working Time Directive is more restrictive (50% of time on standby other than airport</p>

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<p>(a) To count in full:</p> <ul style="list-style-type: none"> <li>(i) Duty periods and flying duty periods, plus subsequent post flight duties.</li> <li>(ii) All standby duty, except that specified in (b)(i) and (ii) below</li> <li>(iii) The time spent on positioning.</li> </ul> <p>(b) To count as half the time on duty:</p> <ul style="list-style-type: none"> <li>(i) The standby duty, when the period of notice given to the crew member by the operator before reporting for duty is treble or more than the specified minimum report time.</li> <li>(ii) The standby duty when undertaken at home, or in suitable accommodation provided by the operator, takes place during the period 22:00 to 08:00 hours, and the crew member can take undisturbed rest and is not called out for duty.</li> </ul>	<p>certification specifications applicable to the type of operation:</p> <p>(c) airport standby shall count in full as duty period for the purpose of points ORO.FTL.210 and ORO.FTL.235.</p> <p><b>CS.FTL.1.225 Standby</b></p> <p>The modification of limits on flight duty, duty and rest periods under the provisions of ORO.FTL.225 complies with the following:</p> <p>(a) Airport standby</p> <p>(2) If an assigned FDP starts during airport standby, the following applies:</p> <ul style="list-style-type: none"> <li>(i) the FDP counts from the start of the FDP. The maximum FDP is reduced by any time spent on standby in excess of 4 hours;</li> <li>(ii) the maximum combined duration of airport standby and assigned FDP as specified in ORO.FTL.205 (b) and (d) is 16 hours.</li> </ul>	<p>counts as duty time).</p>

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
	<p>(b) Standby other than airport standby:</p> <ol style="list-style-type: none"> <li>(1) the maximum duration of standby other than airport standby is 16 hours;</li> <li>(2) The operator's standby procedures are designed to ensure that the combination of standby and FDP do not lead to more than 18 hours awake time;</li> <li>(3) 25% of time spent on standby other than airport standby counts as duty time for the purpose of ORO.FTL.210;</li> <li>(4) standby is followed by a rest period in accordance with ORO.FTL.235;</li> <li>(5) standby ceases when the crew member reports at the designated reporting point;</li> <li>(6) if standby ceases within the first 6 hours, the maximum FDP counts from reporting;</li> <li>(7) if standby ceases after the first 6 hours, the maximum FDP is reduced by the amount of standby time exceeding 6 hours;</li> <li>(8) if the FDP is extended due to in-flight rest according to CS FTL.1.205(c) or split duty according to CS FTL.1.220, the 6 hours of paragraph (6) and (7) are extended to 8 hours;</li> <li>(9) if standby starts between 23:00 and 07:00, the time between 23:00 and 07:00 does not count towards the reduction of the FDP under (6), (7) and (8) until the crew member is contacted by the operator; and</li> <li>(10) the response time between call and reporting time established by the operator allows the crew member to arrive from his/her place of rest to the designated reporting place within a reasonable time.</li> </ol>	

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<b>Limit on Total Block Times</b>		
<p><b>Section B, paragraph 21.1</b></p> <p>A person shall not act as a member of the flight crew of an aircraft if at the beginning of the flight the aggregate of all previous flight times:</p> <p>(a) during the period of 28 consecutive days expiring at the end of the day on which the flight begins exceeds 100 hours. (This means that on the 28th day a flight crew member may depart on a single sector flight, and may complete that sector, even though at the end of the flight the total flying hours completed in 28 days will exceed 100 hours. Consequently, the flight crew member cannot then continue to operate as a flight crew member on any subsequent sectors during that day);</p>	<p><b>ORO.FTL.210 FLIGHT TIMES AND DUTY PERIODS</b></p> <p>(b) The total flight time of the sectors on which an individual crew member is assigned as an operating crew member shall not exceed:</p> <p>(1) 100 hours of flight time in any 28 consecutive days;</p>	<p>Alignment of cabin crew and flight crew maximum hours.</p>
<p><b>Section B, paragraph 21.1</b></p> <p>A person shall not act as a member of the flight crew of an aircraft if at the beginning of the flight the aggregate of all previous flight times:</p> <p>(b) during the period of 12 months expiring at the end of the previous month exceeds 900 hours.</p>	<p><b>ORO.FTL.210 FLIGHT TIMES AND DUTY PERIODS</b></p> <p>(b) The total flight time of the sectors on which an individual crew member is assigned as an operating crew member shall not exceed:</p> <p>(2) 900 hours of flight time in any calendar year; and</p> <p>(3) 1 000 hours of flight time in any 12 consecutive calendar months.</p>	<p>Increase to 1,000 hours maximum flight time in 12 consecutive calendar months. (Note Civil Aviation Working Time Regulations 2010 will limit to 900 a year.)</p> <p>Alignment of cabin crew and flight crew maximum hours.</p>

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<p><b>Section B, paragraph 21.1</b></p> <p>A person shall not act as a member of the flight crew of an aircraft if at the beginning of the flight the aggregate of all previous flight times:</p> <p>... (as above)</p> <p><b>Section B, paragraph 24.2</b></p> <p>The limitations which shall be applied to cabin crew are those applicable to flight crew members contained in paragraphs 6 to 23, but with the following differences:</p> <p>(e) The annual and 28 day limits on flying hours appertaining to flight crew need not be applied.</p>	<p><b>ORO.FTL.210 FLIGHT TIMES AND DUTY PERIODS</b></p> <p>(b) The total flight time of the sectors on which an individual crew member is assigned as an operating crew member shall not exceed:</p> <p>... (as above)</p>	<p>Alignment of cabin crew and flight crew maximum block times.</p>
<b>Maximum Daily Flight Duty Period (FDP)</b>		
<p><b>Section B, paragraph 6 (Calculation of a Flying Duty Period)</b></p> <p>6.1 The maximum FDP, in hours and fractions of hours, shall be in accordance with paragraph 13, Table A or B. The times extracted from the tables may be extended by use of in-flight relief, split duty, and commander's discretion, under the terms of paragraphs 15, 16 and 18. Where an aeroplane flight crew consists of two pilots only, any FDP involving a sector which is planned to exceed 7 hours must be calculated in accordance with the provisions of paragraph 14.</p>	<p><b>ORO.FTL.205 FLIGHT DUTY PERIOD (FDP)</b></p> <p>(b) Basic maximum daily FDP.</p> <p>(1) The maximum daily FDP without the use of extensions for acclimatised crew members shall be in accordance with the following table: (Table 2 below)</p> <p>(2) The maximum daily FDP when crew members are in an unknown state of acclimatisation shall be in accordance with the following table: (Table 3 below)</p> <p>(3) The maximum daily FDP when crew members are in an unknown state of acclimatisation and the operator has implemented a FRM shall be in accordance with the following table: (Table 4 below)</p>	

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<p><b>Section B, paragraph 13</b></p> <p>13.1 Standard reporting times prior to flight must be specified by an operator. Pre-flight duties are part of the FDP. A period of duty must be allowed for post-flight activities: the minimum for major operators is 30 minutes, 15 minutes for others. If this “period” for post-FDP duties is routinely exceeded then the post-FDP duty period stated in the scheme must be revised to better represent the actual time taken. The time spent between reporting for a flight and the completion of post-flight tasks determines the length of the subsequent rest period.</p> <p>13.2 The utilisation of a non-standard reporting time designed to take advantage of an increased FDP from a more favourable time band must not be used.</p>	<p><b>ORO.FTL.110 OPERATOR RESPONSIBILITIES</b></p> <p>An operator shall:</p> <p>(c) specify reporting times that allow sufficient time for ground duties.</p> <p><b>ORO.FTL.205 FLIGHT DUTY PERIOD (FDP)</b></p> <p>(a) The operator shall:</p> <p>(1) define reporting times appropriate to each individual operation taking into account ORO.FTL.110(c).</p> <p><b>GM1 ORO.FTL.205(a)(1) Flight Duty Period (FDP)</b></p> <p>REPORTING TIMES</p> <p>The operator should specify reporting times taking into account the type of operation, the size and type of aircraft and the reporting airport conditions.</p>	<p>Detailed responsibility of Operators required to allocate report times to individual operations and type of operation.</p>
<p><b>Section B, paragraph 13</b></p> <p>13.3 Tables A and C apply when the FDP starts at a place where the crew member is acclimatised; Table B applies at other times.</p>	<p><b>ORO.FTL.205 FLIGHT DUTY PERIOD (FDP)</b></p> <p>(b) Basic maximum daily FDP.</p> <p>(1) The maximum daily FDP without the use of extensions for acclimatised crew members shall be in accordance with the following table: (Table 2 below)</p> <p>(2) The maximum daily FDP when crew members are in an unknown state of acclimatisation shall be in accordance with the following table: (Table 3 below) – see Table 1 for parameters.</p>	

CAP 371 Edition 4									EU Commission Regulation and EASA Decision										Comments		
<b>Table A Two or More Flight Crew - Acclimatised</b>									<b>Table 2 Maximum Daily FDP — Acclimatised Crew Members</b>												
Local time of start	Sectors								Start of FDP at reference time	Sectors											
	1	2	3	4	5	6	7	8 or more		1-2	3	4	5	6	7	8	9	10			
0600-0759	13	12¼	11½	10¾	10	9½	9	9	0600-1329	13:00	12:30	12:00	11:30	11:00	10:30	10:00	09:30	09:00			
0800-1259	14	13¼	12½	11¾	11	10½	10	9½	1330-1359	12:45	12:15	11:45	11:15	10:45	10:15	09:45	09:15	09:00			
1300-1759	13	12¼	11½	10¾	10	9½	9	9	1400-1429	12:30	12:00	11:30	11:00	10:30	10:00	09:30	09:00	09:00			
1800-2159	12	11¼	10½	9¾	9	9	9	9	1430-1459	12:15	11:45	11:15	10:45	10:15	09:45	09:15	09:00	09:00			
2200-0559	11	10¼	9½	9	9	9	9	9	1500-1529	12:00	11:30	11:00	10:30	10:00	09:30	09:00	09:00	09:00			
<b>Table B Two or more flight crew – Not Acclimatised</b>									1530-1559	11:45	11:15	10:45	10:15	09:45	09:15	09:00	09:00	09:00			
Length of preceding rest (hours)	Sectors							7 or more	1600-1629	11:30	11:00	10:30	10:00	09:30	09:00	09:00	09:00	09:00			
	1	2	3	4	5	6	7 or more	1630-1659	11:15	10:45	10:15	09:45	09:15	09:00	09:00	09:00	09:00	09:00			
Up to 18 or over 30	13	12¼	11½	10¾	10	9¼	9	1700-0459	11:00	10:30	10:00	09:30	09:00	09:00	09:00	09:00	09:00	09:00			
Between 18 and 30	11½	11	10½	9¾	9	9	9	0500-0514	12:00	11:30	11:00	10:30	10:00	09:30	09:00	09:00	09:00	09:00			
									0515-0529	12:15	11:45	11:15	10:45	10:15	09:45	09:15	09:00	09:00			
									0530-0544	12:30	12:00	11:30	11:00	10:30	10:00	09:30	09:00	09:00			
									0545-0559	12:45	12:15	11:45	11:15	10:45	10:15	09:45	09:15	09:00			
									<b>Table 3 Crew Members in an Unknown State of Acclimatisation</b>												
									Sectors		1-2	3	4	5	6	7	8				
									Maximum Daily FDP		11:00	10:30	10:00	09:30	09:00	09:00	09:00				

CAP 371 Edition 4			EU Commission Regulation and EASA Decision								Comments																
<p><b>Section B, paragraph 14</b></p> <p><b>Limits on Two Flight Crew Long Range Operations</b></p> <p>14.1 When an aeroplane flight crew is only two pilots, the allowable FDP shall be calculated as follows. A sector scheduled for more than 7 hours is considered as a multi-sector flight, as below:</p>			<p><b>Table 4 Crew Members in an Unknown State of Acclimatisation Under FRM</b></p> <table border="1"> <thead> <tr> <th>Sectors</th> <th>1-2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> <th>7</th> <th>8</th> </tr> </thead> <tbody> <tr> <td><b>Maximum Daily FDP</b></td> <td>12:00</td> <td>11:30</td> <td>11:00</td> <td>10:30</td> <td>10:00</td> <td>09:30</td> <td>09:00</td> </tr> </tbody> </table>								Sectors	1-2	3	4	5	6	7	8	<b>Maximum Daily FDP</b>	12:00	11:30	11:00	10:30	10:00	09:30	09:00	<p>No long sector table provided but, FRM table added.</p> <p>Operator benefits from having comprehensive FRMS.</p>
Sectors	1-2	3	4	5	6	7	8																				
<b>Maximum Daily FDP</b>	12:00	11:30	11:00	10:30	10:00	09:30	09:00																				
<b>Scheduled Sector Times</b>	<b>Acclimatised</b>	<b>Not Acclimatised</b>																									
	<b>Sectors</b>																										
Sector Length over 7 hours but not more than 9 hours	2	4																									
Sector Length over 9 hours but not more than 11 hours	3	4																									
Sector Length over 11 hours	4	Not Applicable																									
<p>The appropriate table in paragraph 13 is then entered with the start time of the duty period and the 'modified' number of sectors, to determine the allowable FDP.</p>																											

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<p><b>Section B, paragraph 14</b></p> <p>14.2 When an additional, current, type rated pilot is a crew member, then these limits do not apply and the permissible FDP is determined by entering Table A or B in paragraph 13 with time of start and the actual sectors planned.</p>	<p><b>ORO.FTL.205 FLIGHT DUTY PERIOD (FDP)</b></p> <p>(f) Unforeseen circumstances in flight operations – commander’s discretion</p> <p>(1) The conditions to modify the limits on flight duty, duty and rest periods by the commander in the case of unforeseen circumstances in flight operations, which start at or after the reporting time, shall comply with the following:</p> <p>(i) the maximum basic daily FDP which results after applying points (b) and (e) of point ORO.FTL.205 or point ORO.FTL.220 may not be increased by more than 2 hours unless the flight crew has been augmented, in which case the maximum flight duty period may be increased by not more than 3 hours.</p>	<p>Simplistic application of the rules could mean some longer duties for a 3-man crew.</p>

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<b>Extensions</b>		
<p><i>(Refer to Standard Level 2 variation here – CAP 371, Section C, Annex F, paragraph 1.3.)</i></p>	<p><b>ORO.FTL.205 FLIGHT DUTY PERIOD (FDP)</b></p> <p>(d) Maximum daily FDP for acclimatised crew members with the use of extensions without in-flight rest ... <i>(See ORO.FTL.205 for full details.)</i></p> <p>(e) Maximum daily FDP with the use of extensions due to in-flight rest ... <i>(See ORO.FTL.205 for full details.)</i></p> <p>(f) Unforeseen circumstances in flight operations - commander's discretion. ... <i>(See ORO.FTL.205 for full details.)</i></p> <p><b>CS FTL.1.205 Flight duty period (FDP)</b></p> <p>(b) Extension of FDP without in-flight rest</p> <p>The extension of FDP without in-flight rest under the provisions of ORO.FTL.205(d)(5) is limited to the values specified in the table ... <i>(See CS FTL.1.205 for table.)</i></p>	<p>Variations no longer applicable, all extensions will be covered under the new regulations document.</p>
<b>Cabin Crew</b>		
<p><b>Section B, paragraph 24.2</b></p> <p>The limitations which shall be applied to cabin crew are those applicable to flight crew members contained in paragraphs 6 to 23, but with the following differences:</p> <p>(a) A flying duty period can be 1 hour longer than that permitted for flight crew. The FDP and limits set on early starts for cabin crew shall be based on the time at which the flight crew report for their flying duty period, but that FDP will start at the report time of the cabin crew.</p>	<p><b>ORO.FTL.205 FLIGHT DUTY PERIOD (FDP)</b></p> <p>(c) FDP with different reporting time for flight crew and cabin crew.</p> <p>Whenever cabin crew requires more time than the flight crew for their pre-flight briefing for the same sector or series of sectors, the FDP of the cabin crew may be extended by the difference in reporting time between the cabin crew and the flight crew. The difference shall not exceed 1 hour. The maximum daily FDP for cabin crew shall be based on the time at which the flight crew report for their FDP, but the FDP shall start at the reporting time of the cabin crew.</p>	<p>Alignment of flight crew and cabin crew duty times, except as in ORO.FTL.205(c).</p>

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<b>Positioning</b>		
<p><b>Section B, paragraph 11.1</b></p> <p>All time spent on positioning at the behest of an operator shall count as duty, but positioning does not count as a sector when calculating the FDP. In these circumstances the FDP commences not later than the time at which the crew member reports for the positioning journey, or positions in accordance with paragraph 9.3.</p>	<p><b>ORO.FTL.215 POSITIONING</b></p> <p>If an operator positions a crew member, the following shall apply:</p> <p>(a) positioning after reporting but prior to operating shall be counted as FDP but shall not count as a sector;</p> <p>(b) all time spent on positioning shall count as duty period.</p>	<p>No change in regulations.</p>
<p><b>Section B, paragraph 11.2</b></p> <p>If, after a positioning journey, the crew member spends less than a minimum rest period at suitable accommodation provided by the operator, and then carries out an FDP, the positioning must be counted as a sector if a split duty is claimed when calculating the allowable FDP. If it is not, then a split duty FDP cannot be used.</p>		<p>No similar requirement in new rules.</p>
<p><b>Section B, paragraph 17.5</b></p> <p>After being called out from a standby duty the length of minimum rest shall be determined by the length of standby duty, plus any time spent on positioning and any FDP completed.</p>	<p><b>ORO.FTL.225 STANDBY AND DUTIES AT THE AIRPORT</b></p> <p>... (See ORO.FTL.225 for full details.)</p> <p><b>CS FTL.1.225 Standby</b></p> <p>The modification of limits on flight duty, duty and rest periods under the provisions of ORO.FTL.225 complies with the following:</p> <p>(b) Standby other than airport standby:</p> <p>(4) standby is followed by a rest period in accordance with ORO.FTL.235.</p>	

CAP 371 Edition 4		EU Commission Regulation and EASA Decision	Comments
<b>Extended FDP (Split Duty)</b>			
<p><b>Section B, paragraph 16.1</b></p> <p>When an FDP consists of two or more sectors - of which one can be a positioning journey counted as a sector - but separated by less than a minimum rest period, then the FDP may be extended by the amounts indicated below.</p>		<p><b>ORO.FTL.220 SPLIT DUTY</b></p> <p>The conditions for extending the basic maximum daily FDP due to a break on the ground shall be in accordance with the following:</p> <p>(a) flight time specification schemes shall specify the following elements for split duty in accordance with the certification specifications applicable to the type of operation:</p> <p>(1) the minimum duration of a break on the ground; and</p> <p>(2) the possibility to extend the FDP prescribed under point ORO.FTL.205(b) taking into account the duration of the break on the ground, the facilities provided to the crew member to rest and other relevant factors;</p> <p>(b) the break on the ground shall count in full as FDP;</p> <p>(c) split duty shall not follow a reduced rest.</p>	
<p><b>Consecutive Hours' Rest</b></p> <p>Less than 3</p> <p>3 - 10</p>	<p><b>Maximum Extension of the FDP</b></p> <p>NIL</p> <p>A period equal to half the consecutive hours' rest taken.</p>		

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<p><b>Section B, paragraph 16.2</b></p> <p>The rest period shall not include the time allowed for immediate post-flight duties and pre-flight duties, a minimum total of 30 minutes. The actual time allowed shall be specified by the operator. When the rest period is 6 hours or less it will suffice if a quiet and comfortable place, not open to the public, is available. If the rest period is more than 6 consecutive hours, then suitable accommodation must be provided.</p> <p><b>Section B, paragraph 16.3</b></p> <p>When rest is taken in the aircraft on the ground, the minimum standards of noise, temperature, light and ventilation are to be specified in the Operations Manual. Such arrangements will only be permitted when the crew have adequate control of the temperature and ventilation within the aircraft, and passengers are not on board.</p>	<p><b>CS FTL.1.220 Split duty</b></p> <p>The increase of limits on flight duty, under the provisions of ORO.FTL.220, complies with the following:</p> <ul style="list-style-type: none"> <li>(a) The break on the ground within the FDP has a minimum duration of 3 consecutive hours.</li> <li>(b) The break excludes the time allowed for post and pre-flight duties and travelling. The minimum total time for post and pre-flight duties and travelling is 30 minutes. The operator specifies the actual times in its Operations Manual.</li> <li>(c) The maximum FDP specified in ORO.FTL.205(b) may be increased by up to 50% of the break.</li> <li>(d) Suitable accommodation is provided either for a break of 6 hours or more or for a break that encroaches the window of circadian low (WOCL).</li> <li>(e) In all other cases:               <ul style="list-style-type: none"> <li>(1) accommodation is provided; and</li> <li>(2) any time of the actual break exceeding 6 hours or any time of the break that encroaches the WOCL does not count for the extension of the FDP.</li> </ul> </li> <li>(f) Split duty cannot be combined with in-flight rest.</li> </ul> <p><b>GM1 CS FTL.1.220(b) Split duty</b></p> <p>POST, PRE-FLIGHT DUTY AND TRAVELLING TIMES</p> <p>The operator should specify post and pre-flight duty and travelling times taking into account aircraft type, type of operation and airport conditions.</p>	<p>Suitable accommodation must be provided if WOCL is encroached, even if break is less than 6 hours.</p> <p>More robust requirements laid out in new regulations.</p>

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<b>Rest</b>		
<p><b>Section B, paragraph 17.2</b></p> <p>The minimum rest period which must be provided before undertaking a flying duty period shall be:</p> <p>(a) at least as long as the preceding duty period, or</p> <p>(b) 12 hours,</p> <p>whichever is the greater.</p> <p><b>Section B, paragraph 24.2</b></p> <p>The limitations which shall be complied to cabin crew are those applicable to flight crew members contained in paragraphs 6 to 23, but with the following differences:</p> <p>(b) For cabin crew the minimum rest period which will be provided before undertaking flying duty period shall be:</p> <p>(i) at least as long as the preceding duty period less 1 hour; or</p> <p>(ii) 11 hours;</p> <p>whichever is the greater.</p>	<p><b>ORO.FTL.235 REST PERIODS</b></p> <p>(a) Minimum rest period at home base.</p> <p>(1) The minimum rest period provided before undertaking an FDP starting at home base shall be at least as long as the preceding duty period, or 12 hours, whichever is greater.</p> <p>(2) By way of derogation from point (1), the minimum rest provided under point (b) applies if the operator provides suitable accommodation to the crew member at home base.</p>	<p>Alignment of flight crew and cabin crew rest periods.</p>

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<p><b>Section B, paragraph 17.2.1</b></p> <p>When away from base, in the case when the rest period earned by a crew member is 12 hours, and suitable accommodation is provided by the operator, then that rest period may be reduced by one hour. In such circumstances, if the travelling time between the aerodrome and the accommodation is more than 30 minutes each way then the rest period must be increased by the amount the total time spent traveling exceeds one hour. The room allocated to the crew member must be available for occupation for a minimum of 10 hours. This sub-paragraph does not apply to rest periods that exceed 12 hours.</p>	<p><b>ORO.FTL.235 REST PERIODS</b></p> <p>(b) Minimum rest period away from home base.</p> <p>The minimum rest period provided before undertaking an FDP starting away from home base shall be at least as long as the preceding duty period, or 10 hours, whichever is greater. This period shall include an 8-hour sleep opportunity in addition to the time for travelling and physiological needs.</p>	<p>One hour less where duty if below 11 hours.</p> <p>More rest when duty falls between 11 and 12 hours.</p> <p>Alignment of flight crew and cabin crew requirements.</p>

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<p><b>Section B, paragraph 17.2.2</b></p> <p>Exceptionally at home base, individual crew members may be asked to exercise their discretion to reduce rest by up to a maximum of one hour but only to a minimum of 12 hours for flight crew and 11 hours for cabin crew. If discretion is used, it is the responsibility of the operator and the crew member to inform the commander of the flight immediately following the rest period that a reduced rest period has been taken.</p> <p><b>Section B, paragraph 17.3</b></p> <p>If the preceding duty period, which includes any time spent on positioning, exceeded 18 hours, then the ensuing rest period must include a local night.</p> <p><b>Section B, paragraph 17.4</b></p> <p>The rest period following a sequence of reduced rest and then an extended FDP cannot be reduced.</p> <p><b>Section B, paragraph 17.5</b></p> <p>After being called out from a standby duty the length of minimum rest shall be determined by the length of standby duty, plus any time spent on positioning, and any FDP completed.</p> <p><b>Section B, paragraph 17.6</b></p> <p>Crew members who inform an operator that they are having difficulty in achieving adequate pre-flight rest must be given the opportunity to consult an aviation medical specialist.</p>	<p><b>ORO.FTL.235 REST PERIODS</b></p> <p>(c) Reduced rest</p> <p>By derogation from points (a) and (b), flight time specification schemes may reduce the minimum rest periods in accordance with the certification specifications applicable to the type of operation and taking into account the following elements:</p> <ol style="list-style-type: none"> <li>(1) the minimum reduced rest period;</li> <li>(2) the increase of the subsequent rest period; and</li> <li>(3) the reduction of the FDP following the reduced rest.</li> </ol> <p>(d) Recurrent extended recovery rest periods</p> <p>Flight time specification schemes shall specify recurrent extended recovery rest periods to compensate for cumulative fatigue. The minimum recurrent extended recovery rest period shall be 36 hours, including 2 local nights, and in any case the time between the end of one recurrent extended recovery rest period and the start of the next extended recovery rest period shall not be more than 168 hours. The recurrent extended recovery rest period shall be increased to 2 local days twice every month.</p> <p>(e) Flight time specification schemes shall specify additional rest periods in accordance with the applicable certification specifications to compensate for:</p> <ol style="list-style-type: none"> <li>(1) the effects of time zone differences and extensions of the FDP;</li> <li>(2) additional cumulative fatigue due to disruptive schedules; and</li> <li>(3) a change of home base.</li> </ol>	<p>More flexible requirements laid out in the new regulations.</p>

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<b>Days Off</b>		
<p><b>Section B, paragraph 20.1</b></p> <p>Wherever possible and if required by the crew member, days off should be taken in the home environment.</p> <p><b>Section B, paragraph 20.2</b></p> <p>A single day off shall include 2 local nights, and shall be of at least 34 hours' duration.</p> <p><b>Section B, paragraph 20.3</b></p> <p>A planned rest period may be included as part of a day off.</p> <p><b>Section B, paragraph 20.4</b></p> <p>Crew members shall:</p> <p>(a) not be on duty more than 7 consecutive days between days off, but may be positioned to the usual operating base on the eighth day, provided they are then allocated at least 2 consecutive days off, and</p> <p>(b) have 2 consecutive days off in any consecutive 14 days following the previous 2 consecutive days off, and</p> <p>(c) have a minimum of 7 days off in any consecutive 4 weeks, and</p> <p>(d) have an average of at least 8 days off in each consecutive 4-week period, averaged over 3 such periods.</p>	<p><b>ORO.FTL.105 DEFINITIONS</b></p> <p>(23) 'single day free of duty' means, for the purpose of complying with the provisions of Council Directive 2000/79/EC, a time free of all duties and standby consisting of one day and two local nights, which is notified in advance. A rest period may be included as part of the single day free of duty</p> <p><b>ORO.FTL.235 REST PERIODS</b></p> <p>(d) Recurrent extended recovery rest periods</p> <p>Flight time specification schemes shall specify recurrent extended recovery rest periods to compensate for cumulative fatigue. The minimum recurrent extended recovery rest period shall be 36 hours, including 2 local nights, and in any case the time between the end of one recurrent extended recovery rest period and the start of the next extended recovery rest period shall not be more than 168 hours [7days]. The recurrent extended recovery rest period shall be increased to 2 local days twice every month.</p> <p><b>CS FTL.1.235 Rest periods</b></p> <p>(a) Disruptive schedules</p> <p>(1) If a transition from a late finish / night duty to an early start is planned at home base, the rest period between the 2 FDPs includes 1 local night.</p> <p>(2) If a crew member performs 4 or more night duties, early starts or late finishes between 2 extended recovery rest periods as defined in ORO.FTL.235(d), the second extended recovery rest period is extended to 60 hours.</p>	<p>This definition must be met to meet the requirements of days off.</p> <p>Working Time Directive of 7 days in a month and 96 in a year, 8 less than current requirements.</p> <p>Strength of the new regulations in regards consecutive duties.</p>

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments				
<b>Extension of Flight Duty Period Due to In-Flight Rest</b>						
<p><b>Section B, paragraph 15.2</b></p> <p>When in-flight relief is utilised there must be, for the crew members resting, a comfortable reclining seat, or bunk, separated and screened from the flight deck and passengers.</p> <p><b>Section B, paragraph 15.3</b></p> <p>A total in-flight rest of less than three hours does not allow for the extension of an FDP, but where the total in-flight rest, which need not be consecutive, is three hours or more, then the permitted FDP may be extended as follows:</p> <table border="0" data-bbox="181 746 925 975"> <tr> <td><b>If rest is taken in a bunk</b></td> <td><b>If rest is taken in a seat</b></td> </tr> <tr> <td>A period equal to one half of the total rest taken, provided that the maximum FDP permissible shall be 18 hours.</td> <td>A period equal to one third of the total rest taken, provided that the maximum FDP permissible shall be 15 hours.</td> </tr> </table>	<b>If rest is taken in a bunk</b>	<b>If rest is taken in a seat</b>	A period equal to one half of the total rest taken, provided that the maximum FDP permissible shall be 18 hours.	A period equal to one third of the total rest taken, provided that the maximum FDP permissible shall be 15 hours.	<p><b>ORO.FTL.205 FLIGHT DUTY PERIOD (FDP)</b></p> <p>(e) Maximum daily FDP with the use of extensions due to in-flight rest</p> <p>Flight time specification schemes shall specify the conditions for extensions of the maximum basic daily FDP with in-flight rest in accordance with the certification specifications applicable to the type of operation, taking into account:</p> <ul style="list-style-type: none"> <li>(i) the number of sectors flown;</li> <li>(ii) the minimum in-flight rest allocated to each crew member;</li> <li>(iii) the type of in-flight rest facilities; and</li> <li>(iv) the augmentation of the basic flight crew.</li> </ul> <p><b>CS FTL.1.205 Flight duty period (FDP)</b></p> <p>(c) Extension of FDP due to in-flight rest</p> <p>In-flight rest facilities in accordance with ORO.FTL.205(e)(iii) fulfil the following minimum standards:</p> <p>... (See CS.FTL.1.205 for full details.)</p> <p>(1) The extension of FDP with in-flight rest under the provisions of ORO.FTL.205(e) complies with the following:</p> <ul style="list-style-type: none"> <li>(i) the FDP is limited to 3 sectors; and</li> <li>(ii) the minimum in-flight rest period is a consecutive 90-minute period for each crew member and 2 consecutive hours for those flight crew members at control during landing.</li> </ul>	<p>Simplistic application of the rules could mean some longer duties for a 3-man crew.</p>
<b>If rest is taken in a bunk</b>	<b>If rest is taken in a seat</b>					
A period equal to one half of the total rest taken, provided that the maximum FDP permissible shall be 18 hours.	A period equal to one third of the total rest taken, provided that the maximum FDP permissible shall be 15 hours.					

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments																																							
<b>Cabin Crew</b>																																									
<p><b>Section B, paragraph 15.3</b></p> <p>A total in-flight rest of less than three hours does not allow for the extension of an FDP, but where the total in-flight rest, which need not be consecutive, is three hours or more, then the permitted FDP may be extended as follows:</p> <p><b>If rest is taken in a bunk</b>      <b>If rest is taken in a seat</b></p> <p>A period equal to one half of the total rest taken, provided that the maximum FDP permissible shall be 19 hours in the case of cabin crew.</p> <p>A period equal to one third of the total rest taken, provided that the maximum FDP permissible shall be 16 hours in the case of cabin crew.</p>	<p><b>CS FTL.1.205 Flight duty period (FDP)</b></p> <p>(c) Extension of FDP due to in-flight rest</p> <p>In-flight rest facilities in accordance with ORO.FTL.205(e)(iii) fulfil the following minimum standards: ... (See CS.FTL.1.205 for full details.)</p> <p>(3) The minimum in-flight rest for each cabin crew member is:</p> <table border="1" data-bbox="931 635 1738 1423"> <thead> <tr> <th rowspan="2">Maximum extended FDP</th> <th colspan="3">Minimum in-flight rest (in hours)</th> </tr> <tr> <th>Class 1</th> <th>Class 2</th> <th>Class 3</th> </tr> </thead> <tbody> <tr> <td>Up to 14:30 hours</td> <td>1:30</td> <td>1:30</td> <td>1:30</td> </tr> <tr> <td>14:31-15:00 hours</td> <td>1:45</td> <td>2:00</td> <td>2:20</td> </tr> <tr> <td>15:01-15:30 hours</td> <td>2:00</td> <td>2:20</td> <td>2:40</td> </tr> <tr> <td>15:31-16:00 hours</td> <td>2:15</td> <td>2:40</td> <td>3:00</td> </tr> <tr> <td>16:01-16:30 hours</td> <td>2:35</td> <td>3:00</td> <td>Not allowed</td> </tr> <tr> <td>16:31-17:00 hours</td> <td>3:00</td> <td>3:25</td> <td>Not allowed</td> </tr> <tr> <td>17:01-17:30 hours</td> <td>3:25</td> <td>Not allowed</td> <td>Not allowed</td> </tr> <tr> <td>17:31-18:00 hours</td> <td>3:50</td> <td>Not allowed</td> <td>Not allowed</td> </tr> </tbody> </table>	Maximum extended FDP	Minimum in-flight rest (in hours)			Class 1	Class 2	Class 3	Up to 14:30 hours	1:30	1:30	1:30	14:31-15:00 hours	1:45	2:00	2:20	15:01-15:30 hours	2:00	2:20	2:40	15:31-16:00 hours	2:15	2:40	3:00	16:01-16:30 hours	2:35	3:00	Not allowed	16:31-17:00 hours	3:00	3:25	Not allowed	17:01-17:30 hours	3:25	Not allowed	Not allowed	17:31-18:00 hours	3:50	Not allowed	Not allowed	<p>More detailed application of the rules and not as permissive as CAP 371.</p>
Maximum extended FDP	Minimum in-flight rest (in hours)																																								
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CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<p><b>Commander's Discretion – Extend an FDP</b></p>		
<p><b>Section B, paragraph 18</b></p> <p>18.1 An aircraft commander may, at his discretion, and after taking note of the circumstances of other members of the crew, extend an FDP beyond that permitted in paragraph 13, Tables A, B, C, or paragraph 23, Table D, provided he is satisfied that the flight can be made safely. The extension shall be calculated according to what actually happens, not on what was planned to happen. An extension of 3 hours is the maximum permitted, except in cases of emergency (see Note 1).</p> <p>18.2 The operator's scheme shall include guidance to aircraft commanders on the limits within which discretion may be exercised, and shall include specific limits to which a commander may extend the flying duty period. In a Flying Duty Period involving 2 or more sectors up to a maximum of 2 hours, discretion may be exercised prior to the first and subsequent sectors. On a single-sector flight and immediately prior to the last sector on a multi-sector flight, a commander may utilise the full amount of discretion authorised by the operator.</p> <p>18.3 A commander may exercise discretion to extend an FDP following a reduced rest period, only exceptionally, and then only to the extent necessary to allow for unforeseen circumstances that become apparent during the last sector.</p> <p>NOTES:</p> <p>1 In respect of an extension of a flying duty period, an emergency is a situation which in the judgment of the commander presents a serious risk to the health or safety of crew and passengers, or endangers the lives of others.</p>	<p><b>ORO.FTL.205 FLIGHT DUTY PERIOD (FDP)</b></p> <p>(f) Unforeseen circumstances in flight operations – commander's discretion</p> <p>(1) The conditions to modify the limits on flight duty, duty and rest periods by the commander in the case of unforeseen circumstances in flight operations, which start at or after the reporting time, shall comply with the following:</p> <p>(i) the maximum basic daily FDP which results after applying points (b) and (e) of point ORO.FTL.205 or point ORO.FTL.220 may not be increased by more than 2 hours unless the flight crew has been augmented, in which case the maximum flight duty period may be increased by not more than 3 hours;</p> <p>(ii) if on the final sector within an FDP the allowed increase is exceeded because of unforeseen circumstances after take-off, the flight may continue to the planned destination or alternate aerodrome; and</p> <p>(iii) the rest period following the FDP may be reduced but can never be less than 10 hours.</p> <p>(2) In case of unforeseen circumstances which could lead to severe fatigue, the commander shall reduce the actual flight duty period and/or increase the rest period in order to eliminate any detrimental effect on flight safety.</p> <p>(3) The commander shall consult all crew members on their alertness levels before deciding the modifications under subparagraphs 1 and 2.</p>	<p>Reduced commander's discretion for two-pilot operations.</p>

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
2 Discretion reports may be used by the CAA to assess the realism of particular schedules.		
<b>Commander's Discretion to Reduce a Rest Period</b>		
<p><b>Section B, paragraph 19.1</b></p> <p>An aircraft commander may, at his discretion, and after taking note of the circumstances of other members of the crew, reduce a rest period but only insofar as the room allocated to the crew member must be available for occupation for a minimum of 10 hours. The exercise of such discretion shall be considered exceptional and must not be used to reduce successive rest periods. If the preceding FDP was extended, the rest period may be reduced, provided that the subsequent allowable FDP is also reduced by the same amount. In no circumstances may a commander exercise discretion to reduce a rest period below 10 hours at accommodation.</p>	<p><b>ORO.FTL.235 REST PERIODS</b></p> <p>(a) Minimum rest period at home base.</p> <p>(1) The minimum rest period provided before undertaking an FDP starting at home base shall be at least as long as the preceding duty period, or 12 hours, whichever is greater.</p> <p>(2) By way of derogation from point (1), the minimum rest provided under point (b) applies if the operator provides suitable accommodation to the crew member at home base.</p> <p>(b) Minimum rest period away from home base.</p> <p>The minimum rest period provided before undertaking an FDP starting away from home base shall be at least as long as the preceding duty period, or 10 hours, whichever is greater. This period shall include an 8-hour sleep opportunity in addition to the time for travelling and physiological needs.</p> <p><b>CS FTL.1.235 Rest periods</b></p> <p>(c) Reduced rest</p> <p>(1) The minimum reduced rest periods under reduced rest arrangements are 12 hours at home base and 10 hours out of base.</p> <p>(2) Reduced rest is used under fatigue risk management.</p> <p>(3) The rest period following the reduced rest is extended by the difference between the minimum rest period specified in ORO.FTL.235(a) or (b) and the reduced rest.</p>	

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
	<ul style="list-style-type: none"> <li>(4) The FDP following the reduced rest is reduced by the difference between the minimum rest period specified in ORO.FTL.235(a) or (b) as applicable and the reduced rest.</li> <li>(5) There is a maximum of 2 reduced rest periods between 2 recurrent extended recovery rest periods specified in accordance with ORO.FTL.235(d).</li> </ul>	
<b>Reporting the Use of Commander’s Discretion</b>		
<p><b>Section B, paragraph 18.4</b></p> <p>Whenever a commander extends an FDP, it shall be reported to his employer on a Discretion Report Form, either in the format of Appendix A or on a form acceptable to the CAA. ...</p>	<p><b>ORO.FTL.205 FLIGHT DUTY PERIOD (FDP)</b></p> <ul style="list-style-type: none"> <li>(f) Unforeseen circumstances in flight operations – commander’s discretion                             <ul style="list-style-type: none"> <li>(4) The commander shall submit a report to the operator when an FDP is increased or a rest period is reduced at his or her discretion.</li> <li>(6) The operator shall implement a non-punitive process for the use of the discretion described under this provision and shall describe it in the operations manual.</li> </ul> </li> </ul>	<p>Stipulates non-punitive reporting process.</p> <p>The CAA has strong oversight with new regulations.</p>
<p><b>Section B, paragraph 18.4</b></p> <p>... If the extension is greater than 2 hours, or when exercised after any reduced rest period, then the operator shall submit the commander's written report, together with the operator's comments to the CAA, within 14 days of the aircraft's return to base.</p> <p><b>Section B, paragraph 19.2</b></p> <p>... If the reduction is more than 1 hour, then the operator shall submit the commander's written report together with the operator's comments, to the CAA, within 14 days of the aircraft's return to base.</p>	<p><b>ORO.FTL.205 FLIGHT DUTY PERIOD (FDP)</b></p> <ul style="list-style-type: none"> <li>(f) Unforeseen circumstances in flight operations – commander’s discretion                             <ul style="list-style-type: none"> <li>(5) Where the increase of an FDP or reduction of a rest period exceeds 1 hour, a copy of the report, to which the operator shall add its comments, shall be sent to the competent authority not later than 28 days after the event.</li> </ul> </li> </ul>	

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<p><b>Section C, Annex A, paragraph 19.1.1</b></p> <p>When away from base and where an individual crew member separates from the crew, or the crew as a whole splits up, then any use of discretion to reduce rest becomes a decision for an individual crew member. The decision to continue with the next flight and the submission of an associated discretion report is the responsibility of the relevant commander after the crew member, and operator if in a position to do so, has informed the commander that a reduced rest period has been taken.</p>		Principles remain but not implicitly stated.
<p><b>Operator Reduced Rest Away from Base</b></p>		
<p><b>Section B, paragraph 17.2.1</b></p> <p>When away from base, in the case when the rest period earned by a crew member is 12 hours, and suitable accommodation is provided by the operator, then that rest period may be reduced by one hour. In such circumstances, if the travelling time between the aerodrome and the accommodation is more than 30 minutes each way then the rest period must be increased by the amount the total time spent travelling exceeds one hour. The room allocated to the crew member must be available for occupation for a minimum of 10 hours. This sub-paragraph does not apply to rest periods that exceed 12 hours.</p>	<p><b>ORO.FTL.235 REST PERIODS</b></p> <p>(b) Minimum rest period away from home base.</p> <p>The minimum rest period provided before undertaking an FDP starting away from home base shall be at least as long as the preceding duty period, or 10 hours, whichever is greater. This period shall include an 8-hour sleep opportunity in addition to the time for travelling and physiological needs.</p>	

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<b>Standby</b>		
<b>Airport Standby</b>		
<p><b>Section B, paragraph 12.2</b></p> <p>When a crew member is on standby duty on immediate readiness at an airport, then the allowable FDP is calculated using the start time of the standby duty.</p>	<p><b>ORO.FTL.225 STANDBY AND DUTIES AT THE AIRPORT</b></p> <p>If an operator assigns crew members to standby or to any duty at the airport, the following shall apply in accordance with the certification specifications applicable to the type of operation:</p>	<p>Detailed rules regarding standby and corresponding responsibilities.</p>
<p><b>Section B, paragraph 12.5</b></p> <p>When any period of standby finishes, during which a call-out has not occurred, at least 12 hours' rest must follow prior to the next duty period.</p>	<p>(a) standby and any duty at the airport shall be in the roster and the start and end time of standby shall be defined and notified in advance to the crew members concerned to provide them with the opportunity to plan adequate rest;</p> <p>(b) a crew member is considered on airport standby from reporting at the reporting point until the end of the notified airport standby period;</p> <p>(c) airport standby shall count in full as duty period for the purpose of points ORO.FTL.210 and ORO.FTL.235;</p> <p>(d) any duty at the airport shall count in full as duty period and the FDP shall count in full from the airport duty reporting time;</p> <p>(e) the operator shall provide accommodation to the crew member on airport standby.</p>	<p>CAP 371, Section B, paragraph 12.2 is the only rule that only relates to airport standby - the rest are applicable to all standby.</p>

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
	<p><b>CS FTL.1.225 Standby</b></p> <p>The modification of limits on flight duty, duty and rest periods under the provisions of ORO.FTL.225 complies with the following:</p> <p>(a) Airport standby</p> <p>(1) If not leading to the assignment of an FDP, airport standby is followed by a rest period as specified in ORO.FTL.235.</p> <p>(2) If an assigned FDP starts during airport standby, the following applies:</p> <p>(i) the FDP counts from the start of the FDP. The maximum FDP is reduced by any time spent on standby in excess of 4 hours;</p> <p>(ii) the maximum combined duration of airport standby and assigned FDP as specified in ORO.FTL.205(b) and (d) is 16 hours.</p>	

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<b>Other Forms of Standby (Including Standby at Hotel)</b>		
<p><b>Section B, paragraph 12.1</b></p> <p>... The time a standby duty starts determines the allowable FDP, except that when the actual FDP starts in a more limiting time band than that FDP limit will apply. However, when standby is undertaken at home, or in suitable accommodation provided by the operator, during the period 2200 to 0800 hours local time and a crew member is given 2 hours' or less notice of a report time, the allowable FDP starts at the report time for the designated reporting place.</p> <p><b>Section B, paragraph 12.3</b></p> <p>If a crew member is called out from standby, the standby duty will cease when that individual reports at the designated reporting point.</p>	<p><b>CS FTL.1.225 Standby</b></p> <p>The modification of limits on flight duty, duty and rest periods under the provisions of ORO.FTL.225 complies with the following:</p> <p>(b) Standby other than airport standby</p> <ol style="list-style-type: none"> <li>(1) the maximum duration of standby other than airport standby is 16 hours;</li> <li>(2) The operator's standby procedures are designed to ensure that the combination of standby and FDP do not lead to more than 18 hours awake time;</li> <li>(3) 25% of time spent on standby other than airport standby counts as duty time for the purpose of ORO.FTL.210;</li> <li>(4) standby is followed by a rest period in accordance with ORO.FTL.235;</li> <li>(5) standby ceases when the crew member reports at the designated reporting point;</li> </ol>	<p>16 hour maximum for both flight crew and cabin crew.</p>

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments						
<p><b>Section B, paragraph 12.4</b></p> <p>The following limits apply:</p> <table border="1" data-bbox="174 399 931 563"> <thead> <tr> <th data-bbox="174 399 589 454">Duty</th> <th data-bbox="589 399 931 454">Maximum Duration</th> </tr> </thead> <tbody> <tr> <td data-bbox="174 454 589 510">Standby duty (all cases)</td> <td data-bbox="589 454 931 510">12 hours</td> </tr> <tr> <td data-bbox="174 510 589 563">Standby followed by an FDP</td> <td data-bbox="589 510 931 563">As in case A and B below</td> </tr> </tbody> </table> <p><b>Case A</b></p> <p>If a crew member is called out from standby to conduct an FDP before completing 6 hours' standby duty then the total duty period allowed is the sum of the time spent on standby and the FDP allowable from paragraph 13, Tables A, B, C, or paragraph 23, Table D.</p> <p><b>Case B</b></p> <p>If a crew member is called out from standby to conduct an FDP after completing 6 or more hours' standby duty, then the total duty period allowed is the sum of all the time spent on standby and the allowable FDP, reduced by the amount of standby worked in excess of 6 hours.</p> <p><b>Notes:</b></p> <ol style="list-style-type: none"> <li>1 The method of adding time spent on standby to cumulative totals is stated in paragraph 22.</li> <li>2 The reference to 'total duty period' applies <b>only</b> to the sum of the standby time achieved + the allowable FDP obtained from paragraph 13. On the day, for cumulative duty totals and for minimum rest purposes, the total duty achieved will be standby time achieved + FDP achieved + post-flight duties + any positioning.</li> </ol>	Duty	Maximum Duration	Standby duty (all cases)	12 hours	Standby followed by an FDP	As in case A and B below	<p><b>CS FTL.1.225 Standby</b></p> <p>The modification of limits on flight duty, duty and rest periods under the provisions of ORO.FTL.225 complies with the following:</p> <p>(b) Standby other than airport standby</p> <ol style="list-style-type: none"> <li>(6) if standby ceases within the first 6 hours, the maximum FDP counts from reporting;</li> <li>(7) if standby ceases after the first 6 hours, the maximum FDP is reduced by the amount of standby time exceeding 6 hours;</li> <li>(8) if the FDP is extended due to in-flight rest according to CS FTL.1.205(c), or to split duty according to CS FTL.1.220, the 6 hours of paragraph (6) and (7) are extended to 8 hours;</li> <li>(9) if standby starts between 23:00 and 07:00, the time between 23:00 and 07:00 does not count towards the reduction of the FDP under (6), (7) and (8) until the crew member is contacted by the operator; and</li> <li>(10) the response time between call and reporting time established by the operator allows the crew member to arrive from his/her place of rest to the designated reporting place within a reasonable time.</li> </ol>	<p>UK Working Time Directive states 50% of time spent on standby other than airport standby counts as duty time.</p>
Duty	Maximum Duration							
Standby duty (all cases)	12 hours							
Standby followed by an FDP	As in case A and B below							

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<p><b>Section B, paragraph 17.5</b></p> <p>After being called out from a standby duty the length of minimum rest shall be determined by the length of standby duty, plus any time spent on positioning, and any FDP completed.</p> <p><b>Section B, paragraph 12.5</b></p> <p>When any period of standby finishes, during which a call-out has not occurred, at least 12 hours' rest must follow prior to the next duty period.</p> <p><b>Section B, paragraph 22.3</b></p> <p>Duty hours shall be added to cumulative totals in accordance with the following:</p> <p>a) To count in full:</p> <ul style="list-style-type: none"> <li>i) Duty periods and flying duty periods, plus subsequent post-flight duties</li> <li>ii) All standby duty, except that specified in (b)(i) and (ii) below</li> </ul> <p>b) To count as half the time on duty:</p> <ul style="list-style-type: none"> <li>i) The standby duty, when the period of notice given to the crew member by the operator before reporting for duty is treble or more than the specified minimum report time.</li> <li>ii) The standby duty when undertaken at home, or in suitable accommodation provided by the operator, takes place during the period 2200 to 0800 hours, and the crew member can take undisturbed rest and is not called out for duty.</li> </ul>	<p><b>GM1 CS FTL.1.225(b) Standby</b></p> <p>STANDBY OTHER THAN AIRPORT STANDBY NOTIFICATION</p> <p>Operator procedures for the notification of assigned duties during standby other than airport standby should avoid interference with sleeping patterns if possible.</p>	

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<b>Nutrition</b>	<p><b>ORO.FTL.240 NUTRITION</b></p> <p>(a) During the FDP there shall be the opportunity for a meal and drink in order to avoid any detriment to a crew member's performance, especially when the FDP exceeds 6 hours.</p> <p>(b) An operator shall specify in its operations manual how the crew member's nutrition during FDP is ensured.</p> <p><b>AMC1 ORO.FTL.240 Nutrition</b></p> <p>MEAL OPPORTUNITY</p> <p>(a) The operations manual should specify the minimum duration of the meal opportunity, when a meal opportunity is provided, in particular when the FDP encompasses the regular meal windows (e.g. if the FDP starts at 11:00 hours and ends at 22:00 hours meal opportunities for two meals should be given).</p> <p>(b) It should define the time frames in which a regular meal should be consumed in order not to alter the human needs for nutrition without affecting the crew member's body rhythms.</p>	CAP 371 guidance is inadequate regarding nutritional requirements.

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<b>Flight Duty, Duty and Rest Period Records</b>		
<p><b>Section B, paragraph 25.1</b></p> <p>Records for the duty and rest periods of all flying staff must be kept. These records shall include:</p> <p>For each crew member:</p> <p style="padding-left: 40px;">The beginning, end and duration of each duty or flying duty period, and function performed during the period. Duration of each rest period prior to a flying duty or standby duty period. Dates of days off. 7 consecutive day totals of duty.</p> <p style="padding-left: 40px;">With the agreement of the CAA, operators employing more than 100 cabin crew need only record the information required above for a percentage of cabin crew. The size of the percentage and the rate of sampling will be agreed by the assigned Inspector and the operator.</p> <p>For each flight crew member:</p> <p style="padding-left: 40px;">Daily and 7 consecutive day flying hours.</p> <p><b>Section B, paragraph 3.2</b></p> <p>... It is emphasised that crew members working on a freelance basis must maintain an individual record of their flying and duty hours which must be presented to an operator before undertaking a duty period. ...</p>	<p><b>ORO.FTL.245 RECORDS OF HOME BASE, FLIGHT TIMES, DUTY AND REST PERIODS</b></p> <p>(a) An operator shall maintain, for a period of 24 months:</p> <p style="padding-left: 20px;">(1) individual records for each crew member including:</p> <p style="padding-left: 40px;">(i) flight times;</p> <p style="padding-left: 40px;">(ii) start, duration and end of each duty period and FDP;</p> <p style="padding-left: 40px;">(iii) rest periods and days free of all duties; and</p> <p style="padding-left: 40px;">(iv) assigned home base;</p> <p style="padding-left: 20px;">(2) reports on extended flight duty periods and reduced rest periods.</p> <p>(b) Upon request, the operator shall provide copies of individual records of flight times, duty periods and rest periods to:</p> <p style="padding-left: 20px;">(1) the crew member concerned; and</p> <p style="padding-left: 20px;">(2) another operator, in relation to a crew member who is or becomes a crew member of the operator concerned.</p> <p>(c) Records referred to in point CAT.GEN.MPA.100(b)(5) in relation to crew members who undertake duties for more than one operator shall be kept for a period of 24 months.</p>	<p>24 month period of record collection.</p>

CAP 371 Edition 4	EU Commission Regulation and EASA Decision	Comments
<p><b>Section B, paragraph 25</b></p> <p>25.1 ... Records shall be preserved for at least 12 calendar months from the date of the last relevant entry.</p> <p>25.2 Additionally, operators shall retain all aircraft commanders' discretion reports of extended flying duty periods, extended flying hours, and reduced rest periods for a period of at least six months after the event.</p>		