



ECA
Piloting Safety

Mr. Danail PAPAZOV
Minister of Transport
Bulgaria

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Sent by email: mail@mtitc.government.bg

Brussels, 1 July 2013

Re: Passenger Safety & Your Approval of EU Flight Time Limitations

Dear Minister,

When flying on board an aircraft, you – like any other passenger – would expect your pilots in the cockpit to be fully alert, especially when landing your aircraft at the end of a long day on flight duty.

With this in mind we contact you, because your national representatives in the 'EASA Committee' will, on the 11th/12th July, vote on a controversial proposal for new EU-wide Flight Time Limitation (FTL) rules, which are supposed to prevent pilot fatigue from posing a risk to flight safety.

With 15-20% of all fatal air accidents related to human error having pilot fatigue as a contributing factor, such EU rules must be safe. This means they must be based on scientific evidence and best regulatory practices.

However, your representatives will be asked to vote on a text that is not fit for purpose. Just two months ago, six renowned [scientific experts criticized the FTL proposal](#) for not being in line with what scientists consider necessary to ensure safe flight operations.

Two weeks ago, one of those experts, Dr. Gundel, advised the European Parliament Transport Committee, that safe night operations can only be achieved if the flight duty is limited to 10 hours at night – instead of the proposed '11 hours' (in fact up to 12:30 hrs twice a week). This 10 hours limit is in line with the scientific consensus since 1995, he stressed. And yet the Commission intends to ignore this unanimous expert view.

Another well-known scientist, MSc. Mick Spencer, recently stated on TV: *"The regulator is taking enormous amount of responsibility onto itself by going up to 11 hrs [at night] against the advice of independent scientists"*. He called upon EU decision-makers, saying *"If you reject our concerns then make it clear that this is what you're doing and why you're doing it. And you take full responsibility for that."* (see his [interview here](#) – scroll to 7m30s + 13m10s).

Safety Petition: 100.000 Citizens signed – Do the [same!](#)

European Cockpit Association AISBL

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Finally, the independent [European Transport Safety Council](#) recently called for caution: "ETSC would therefore urge the Commission, EU Member States and the Parliament to think carefully before giving the final approval to the current proposals."

From our daily work as pilots, we know how fatiguing night flights are. And we know how hard it is to remain fully alert at the end of a long duty day, possibly with multiple take-offs and landings. The proposed new rules on standby, for example, will allow a pilot to land an airplane after having been on standby and flight duty for up to 22 hours. This is not safe. To allow such excessively long working days means the legislator deliberately takes risks – risks for the crew and risks for our passengers.

Already today, pilot fatigue is a reality in Europe's cockpits, as [surveys among over 6.000 European pilots](#) from 8 European countries have shown. Adopting an immature and potentially unsafe set of rules will only make this situation worse – not least in view of ever more busy skies with air traffic forecast to increase significantly in future.

As the ones having to operate under the new FTL rules in the near future, we urge you to ensure passenger safety is put before any other considerations. Adopting the Commission proposal as it stands today, with the argument that this is a 'package' which should not be reopened, would mean taking the responsibility – particularly in case of an accident – for waving through an unsafe set of rules.

We therefore urge you to task your representatives at the EASA Committee meeting with asking the Commission to change the proposal. These changes must reflect the views of scientific fatigue experts, including specifically: a limitation of 10 hrs flight duty time at night; a limitation of 18 hrs on the combined duration of standby and a subsequent flight duty; and a legally binding article that allows – as today – a Member State to maintain and/or adopt stricter, more protective safety rules at national level if they wish to, in order to prevent a downward harmonization of safety standards in several countries.

We very much hope you will support such a safety-oriented approach.

Yours sincerely,



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ECA President



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ECA Professional Affairs Director



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Mark Searle
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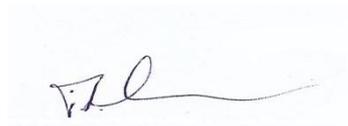
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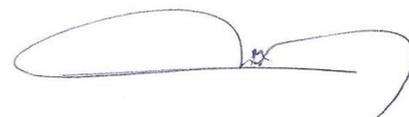
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