

## President's Message

### Member-Comments on the Proposed Fatigue Management Regulations

Admittedly, consulting on the content of *any* regulation in the heart of a busy helicopter operating season is less-than-desirable, but in response to my request for comments on the Gazette I version of the DRAFT Fatigue Management regulations (<http://www.gazette.gc.ca/rp-pr/p1/2017/2017-03-25/pdf/g1-15112.pdf>), I did receive some feedback. I had invited operator-members to comment on the most problematic elements of the proposed regulations, but also to include their suggestions for changes that would mitigate those offending sections.

The comments that I received focused primarily on a few elements of the draft regulation. I have included a short summary (in no particular order), below:

1. **Cumulative Duty Hours** Most commenters were alarmed over the Cumulative Duty Hour provisions, particularly where repetitive, but infrequent operations were concerned – 12-hour driller shift-changes, or morning drop-offs and evening pick-ups were concerned (i.e. Sampling or Line Cutting), for example. Even though the Duty Day could be a maximum of 13 hours, the Cumulative Duty Hour provisions of the draft regulations only allowed an average of 10 Duty hours per day over a 21-day working tour of duty. Members felt that since there is little support in the scientific literature for the cumulative duty hour concept, that it should be removed – or at least “zeroed” for consecutive days-off. The Split Duty provisions in the draft regulations didn't mitigate the cumulative duty hour requirements since they allowed for an extension to the maximum Duty Day, but the Duty Hours continued to accumulate (that is, you were mortgaging the future Duty Days);
2. **“Zeroing”** Commenters, universally were offended by the removal of the zeroing provisions from the new draft regulations, particularly since there is strong support in the fatigue related science for the recuperative value of consecutive days free from duty. The value of the zeroing provisions in our industry is paramount since, there are often long distances involved getting to the job site, and flight crew members often appreciate the extended periods of time-off at home – rather than in a camp.
3. **Exclusion of CAR 702** A number of commenters remarked that tracking CAR 702 operations (excluded from the application of the new draft regulations – and unaffected by the proposed changes) and CAR 703 operations, separately, may present a challenge in an industry that often switches between CAR 702 and 703 many times, in the same day. At the same time, members said that they would rather manage the issue than have 702 included in the Application of the new rules.
4. **10 Hours in the Rest Facility in Deployed Operations and 12 Hours at Home** Members commented that this new requirement was a lifestyle issue rather than a safety issue, and that 10 hours opportunity for rest, in either case was sufficient, assuming that the rest facility was nearby.
5. Most operators commented that FRMS sounded promising as a mechanism to mitigate fatigue, and at the same time obtain some relief from the most oppressive

elements of the proposed regulations – but, also expressed that the its requirements were not well-suited to the ability of small operators.

Operators with other comments on the proposed regulations, should forward them to [fred.jones@h-a-c.ca](mailto:fred.jones@h-a-c.ca) without delay, as HAC and other Coallition partners are preparing our formal CG1 joint submission.