



DEFENCE AVIATION SAFETY AUTHORITY
COMMENT RESPONSE DOCUMENT TO
NPA 2019-008 – DASR.AFM (AVIATION FATIGUE MANAGEMENT)

INTRODUCTION

- 1. General.** This Comment Response Document (CRD) outlines DASA's agreed policy, any regulation changes to be made as a result of the NPA process. It finalises the public consultation process in respect of the NPA. DASA will consider views or arguments opposing the views expressed in the CRD only in exceptional circumstances. Any member of the regulated community having views or arguments to support an appeal against the decisions documented in this CRD may petition DASA to consider such an appeal.
- 2. Background.** On 18 Dec 20, DASA released Notice of Proposed DASR Amendment (NPA) 2019-008 – DASR.AFM (Aviation Fatigue Management) for comment. The period for public comment on the proposals contained in this NPA closed on 28 Feb 21. However, DASA granted an extension to 30 March 21 to allow additional time for responses. DASA subsequently consulted with each environmental command HQ to ensure the DASA responses to NPA feedback was acceptable.
- 3.** A key recommendation received in feedback was to de-conflict the proposed acronym for DASR Aviation Fatigue Management (DASR.AFM) with the acronym for Aircraft Flight Manual (AFM). For the remainder of this CRD the DASR Aviation Fatigue Management will be referred to in acronym form as 'DASR.AVFM' — except when quoting NPA feedback, where the original text has been retained.
- 4.** The DFSB sponsored Defence Aviation Fatigue Management Guidebook (DAVFMG) formed part of this NPA. However, DFSB published the DAVFMG in April 2021, prior to completion of the NPA/CRD processes—making guidance available to the community at the earliest juncture. ACPA will pass the NPA comments received, recommending improvements to the DAVFMG to DFSB for consideration in future revisions to the DAVFMG.

ANALYSIS OF COMMENTS

General

- 5.** Many comments were received that supported improved regulatory outcomes. All comments are individually listed and replied to at Table 1 – DASR.AVFM feedback.

Environmental command endorsement positions

6. Each environmental command HQ provided endorsement positions as follows:
 - a. HQFORCOMD¹ endorsed without change.
 - b. HQFAA endorsed without change.
 - c. HQAC endorsed, but would be improved with proposed changes.
7. **DASA response.** The majority of feedback has been accepted and incorporated into the revised regulatory draft. The revised draft was passed back to each environmental command HQ, and received subsequent endorsement.

Environmental command resource positions

8. Each environmental command HQ advised resource implications as follows:
 - a. **HQ FORCOMD:**

There are likely to be a number of implementation challenges. These include standardising and systematising rostering practices, developing a system to capture duty/rest data, harnessing software to improve fatigue assessment at commencement of, and during, duty and significant cultural challenges. Given extant workforce pressures in parts of the capability, particularly those with supervisory and command responsibilities, there is a risk that fatigue risk management will be seen as operationally restrictive and increasingly bureaucratic. This has the potential to create unintended consequences that will need to be carefully monitored and managed.

- b. **HQFAA:**

Overall expect little impact, if any to current 'operations' fatigue management policy as defined in SI(NA) OPS 06-01—Aviation Medicine. Fatigue management for maintenance teams is currently defined under a separate SI (as a carry-over from old regs) and will probably remain so until this topic is combined under DASRs.

- c. **HQAC:**

There is potentially significant OIP development required by MAO staff to achieve the compliance requirements of the proposed [DASR.AVFM]. The grandfathering of extant fatigue policy would reduce the burden of proof required during the eventual transition to [DASR.AVFM]. Fatigue training and support needs to be established by yet to be determined providers.

9. **DASA response – transition plan.** DASA has incorporated a transition plan with the introduction of DASR.AVFM—to mitigate the resource impacts on MAOs and ANSPs. In this plan, DASA will provide a 12-month transition period, commencing on the date of publication of DASR.AVFM. This transition period will allow MAOs and ANSPs to make the necessary changes to their aviation fatigue management systems. DASA will not enforce MAO or ANSP compliance with DASR.AVFM when

¹ HQ FORCOMD were, at the time of the NPA, the environmental command for Army. WEF 01 Sep 21, CMDR AVNCOMD assumed the responsibility for the environmental command in Army.

conducting oversight activity during the transition period. DASA will consider extensions to the transition period on request.

Table 1 – DASR.AVFM feedback

LSN	NPA Reference	Comment or suggested change	Explanation	DASA Reply
1	Definitions	Aviation Fatigue Management (AFM)	AFM is currently defined in the DASR Acronym List as Aircraft Flight Manual. Aircraft Flight Manual is presently in use; however, the AAP 7000.003 uses 'flight manual (FM)', not 'aircraft flight manual'.	DASA changed the acronym to AVFM. This removes aircraft flight manual (AFM) conflicts and also synchronises to other titles using the word aviation, such as AVR, AVMO, etc. Changing the existing acronym for Aircraft Flight Manual may have created more confusion—as in addition to the DASR Glossary there are other DASA products which use AFM to indicate Aircraft Flight Manual.
2	Definitions	Consider replacing 'and/or' in the Fatigue definition with 'or'.	Either condition of physical or mental activity can cause fatigue. Retain the current and/or only if alignment to ICAO must be maintained.	Accepted. DASA edited the definition to reflect 'or' only—to match the use of 'or' in the first line.
3	DASR.AVFM	Purpose statement	Is there a purpose statement that defines the Hazard/Context/Defence for Aviation Fatigue Management?	Accepted. DASA provided a purpose statement (noting, Context, Hazard and Defence) for each individual regulation in the GM sections.
4	General	Replace instances of 'and/or' with correct conjunctions	ADF Writing Manual and Government Style Manual decry using and/or. 'And' is the correct conjunction in most occurrences of and/or in writing, followed by 'or': rarely is it the case that A or B or both A and B is required to be specified and in which case the correct, precise method is to write 'A or B or both A and B'.	Accepted. DASA edited the instances of 'and/or' accordingly.
5	AVFM 10.a IR Proofs	Replace 'and/or' in CONDITIONAL – AFM.10.a applies first bullet with 'or'	Either condition invokes requirements under DASR.AFM	See LSN 4.

LSN	NPA Reference	Comment or suggested change	Explanation	DASA Reply
6	AVFM 10 Scope Section 2	There is an 'AMC AFM.20.b.2 – Scope' under this .10 tab. Should this be 'AMC AFM.10.b.2'? as there's already an AMC AFM.20.b.2 further down. Or seeing as it's the only AMC to para b, just 'AMC AFM.20.b'??	This section defines all of the applicable personnel to which this DASR applies. With ACG's (maybe) long endurance UAS inbound in a few years, does UAS pilot fit under these definitions, noting they can be FW or RW and their new title may not be defined yet? Ie: can still add a future proof option such as UAS pilot etc??...along with their sensor operators/crew. These things will be airborne for 24+ hours.	Agreed. The content under AMC AFM.20.b.2 (as it was referred to in the NPA) was incorrectly numbered. The correct numbering would have been 10.b.2. However, this element has now been elevated to the IR. Changes have been made to future proof the regulation though use of definitions vice listing specific categories that this regulation may be applicable to. GM is also provided to command making it clear personnel not regulated by DASR.AVFM can be placed under the regulation by command if so desired.
7	AVFM.10.b Scope AMC	Does this AMC confuse the scope by being prescriptive with specifying various employment groups?	Maybe have two sentences. The first being technically specific in referring to Aircrew and Air Traffic Management employment groups. The second sentence being more guidance related, so it cannot be interrupted as excluding other employment categories not specified.	See LSN 6.
8	AVFM.10.b Scope AMC	Air Refuelling Operators (ARO)	Are Air Refuelling Operators (ARO) included within the scope? This is an example of confusion caused by the poorly worded scope.	See LSN 6. AROs are, by definition, aircrew; and therefore are included within the scope.
9	AVFM.10 – Scope	Scope. JBAC – this term is no longer used, please remove. Also applies to AFM.20.b.AMC	All Defence (civil/APS and military/RAAF) Air Traffic Controllers now come under the term Air Traffic Controllers or Air Traffic Control Officers as applicable.	DASA removed the term 'JBAC' from the scope.

LSN	NPA Reference	Comment or suggested change	Explanation	DASA Reply
10	AVFM.10.b Scope AMC	Should the scope of DASR.AFM include Flight Test Engineers (FTE) whom operate as aircrew?	Other employment groups have been specified within AMC.	See LSN 6. FTE are aircrew; and therefore they are included within the scope.
11	AVFM.10.b Scope AMC	Should the scope of DASR.AFM include remote pilots and the operation of UAS?	UAS are not necessarily operated by Aircrew or Air Traffic Management personnel.	UAS of Certified category and crew who operate them are now captured within the scope of DASR.AVFM. Commanders may choose to apply AVFM to other UAS crew.
12	AVFM.10.b Scope AMC	Signpost for essential passenger fatigue management	Is it worth explaining where and how flyaway maintenance personnel manage fatigue?	MAOs may deem 'flyaway maintenance personnel' 'mission essential passengers'. DASA has added GM guiding command to consider the fatigue management of mission essential passengers.
13	AVFM.10.b.5(2) GM Section 3	2. DASA maintains a list of approved fatigue Subject Matter Experts and/or organisations.	The 'or' conjunction is not required as DASA maintains a list of both: there is no discretion to maintain one or the other—only if there is no SME or organisation would one not be maintained but that event would be self-explanatory.	DASA removed 10.b.5(2).
14	AVFM.10.b.5.2 GM	Fatigue Management Skills Incorrect numbering on page 6, suggest should read: GM AFM.20.b.5.2 Fatigue Management Skills	This revised reference is used for the following LSN 14-15.	DASA resolved the incorrect numbering.

LSN	NPA Reference	Comment or suggested change	Explanation	DASA Reply
15	AVFM.10.b.5 Section 2 – GM	Fatigue Management Skills numbering.	As per AFM.10, this one falls under AFM.20, so look to renumber 10 to 20.	DASA resolved the incorrect numbering.
16	AVFM.20	Use of the word 'plant'	Acknowledge that the generalised term 'plant' is technically correct, however it may be helpful if it could be contextualised for ADF activities.	DASA replaced the term 'plant' with 'aviation systems' as defined in DASR Glossary.
17	AVFM.20	AM must define vs AM must ensure	Is it acceptable for the AM to ensure that the MAO has defined management controls...etc? The case may be that the fatigue management policy is published by SME within the wing rather than the FEG HQ.	DASA amended AVFM.20 to read 'must utilise defined...' rather than 'must define...' This does not constrain the ability for an AM to determine where the responsibility for defining OIP sits within the MAO or ANSP. It is acceptable for the AM to delegate the responsibility for defining OIP (including to 'SME within the wing rather than the FEG HQ').
18	AVFM 20.a	Compliance Proofs. What timeframe will be acceptable to conduct the 7 step RM process on control		DASA will provide a Transition Plan which includes guidance on the appropriate implementation time frame. Compliance proofs will be replaced by verification criteria. Verification criteria will not be disseminated to the regulated community as they are for DASA internal use.
19	AVFM 10b.2 Scope	Compliance Proofs. Scope – very specific.	What happens if a new employment group is added? Is ARO included?	See LSN18 re compliance proofs. See LSN 6 regarding new employment groups (or categories).

LSN	NPA Reference	Comment or suggested change	Explanation	DASA Reply
20	AVFM.20.b.2 AMC	ASMS Integration. Why is it that fatigue, which is a hazard like many other regulations, is singled out for ASMS Integration and no other regulation is?	To what extent must fatigue be integrated within ASMS? Do all 12 elements require compliance	<p>1. DASR.AVFM is not unique in calling out DASR.SMS. For example, DASR.ANSP.40 and DASR.139.60 also call out DASR.ASMS. The integration of fatigue management and SMS ensures the further identification and continuous improvement of all controls to minimise aviation fatigue risk (GM AVFM.20.b.2 refers).</p> <p>2. This IR does not seek to prescribe which elements of the ASMS are required to be integrated with the ANSP or MAO's AVFM management system. The AM is best placed to determine which elements of the ASMS best absorb MAO or ANSP AVFM product. DASA may provide guidance (on request or during oversight activities) should the ANSP or MAO's AVFM product need expansion to other elements. Given the broad differences in aircraft types and missions, being more specific within regulation may otherwise impose an unnecessary burden on the MAO or ANSP.</p>
21	AVFM.20.b.4 AMC	Is the DAVFMG AMC?	Does this make the DAVFMG binding for DASR compliance unless an AltMoC has been established?	No, DAVFMG is not AMC.
22	AVFM.20.b.2 Section 3	look to reword	The actual proposed 'AMC AFM.20.b.2 – SMS Integration' reads OK as it keeps the integration generic within the 4 higher ASMS Framework COMPONENTS. Whereas the Section 3 compliance proofs add additional requirements that may not be applicable.	<p>See LSN 18 (ie Section 3 of the Draft DASR.AFM deals with compliance proofs).</p> <p>DASA removed all reference to '12 elements'.</p>
23	AVFM.20.b.2 Scope AMC	Incorrect numbering on page 4, suggest should read: AMC AFM.10.b Scope	This revised reference is used for the following LSN 6-10.	DASA resolved the incorrect numbering.

LSN	NPA Reference	Comment or suggested change	Explanation	DASA Reply
24	AVFM.20.b.5.2 GM	Fatigue Management Skills How would the list of approved fatigue SME and/or organisations be accessed?	Would this list be available via the DASA website?	DASA removed the obligation on ANSPs and MAOs to utilise 'staff skilled in Fatigue management as approved by the Authority'. DASA has removed reference to SME from the regulation. Hence, there is no requirement for a list of SMEs on the DASA website.
25	AVFM.20.b.5.2 GM	Fatigue Management Skills What staff skills?	Who is considered skilled in FM practices, is there a course, or is it experience based?	DASA removed the obligation on ANSPs and MAOs to utilise 'staff skilled in Fatigue management as approved by the Authority'. Should an ANSP or MAO require SME advice, DFSB can provide SME advice with respect to AVFM Systems, while IAM can provide SME advice with respect to the physiology associated with fatigue management.

LSN	NPA Reference	Comment or suggested change	Explanation	DASA Reply
26	AVFM.20.b.7 AMC	There is a lack of consistency across the way DADR describes training competency and currency requirements in various regulations (ie Aircrew.10/55/60, MED.05 and AFM.20).	<p>There should be consistent regulatory phrasing that allows AM flexibility to determine the competency and currency policy, including any flexibility for extensions (unlike MED.05).</p> <p>The issue identified with MED.05 is that it is a prescriptive regulation that has been identified as problematic in the COVID-19 context where 5 year training has not been possible due various reasons.</p> <p>The solution to prescriptive regulation is for the regulated community to utilise DADR SPA.10 Command Clearance.</p> <p>The observation made was to have consistent regulatory phrasing that does afford some flexibility mechanism regarding competency and currency policy rather than encouraging the use of DADR SPA.10 Command Clearance.</p>	<p>MED.05 was amended to remove extensions when the previous change extended the currency to five years. ACPA is now seeking to amend MED.05 to allow flexibility once again for AVMED training currency.</p> <p>Other referenced regulations already provide flexibility as follows:</p> <p>AMC MED.10.A – Flexibility Provisions (AUS) affords command flexibility for medical certificates.</p> <p>Aircrew.10 allows command flexibility for development of currency periods.</p> <p>AVFM.20 affords flexibility as the AM creates the system to be used.</p> <p>AVFM.20 does not prescribe limitations.</p> <p>DASA is conducting a deliberate review of all Flight Operations DADR with a view to, <i>inter alia</i>, applying consistency in regulation phrasing.</p>

LSN	NPA Reference	Comment or suggested change	Explanation	DASA Reply
27	AVFM.20.b.7 AMC	AFM training	<p>What AFM training is available and acceptable to DASA?</p> <p>What Compliance Proofs training courses will be available?</p> <p>In order to be compliant, exemptions need to be part of an Acceptable Mean of Compliance (AMC) rather than in Guidance Material (GM).</p>	<p>See LSN18.</p> <p>This comment now relates to AVFM.20.b.6 AMC as a result of renumbering. DASA added an AMC exemption to reflect that, until formal training is developed, DASA will not hold units to compliance with this specific record keeping task — as long as units identify a person responsible for the unit's AVFM policy.</p>
28	AVFM.20.b.7(1) AMC	1. Aviation Fatigue Management competency and currency should be implemented IAW DADR AIRCREW.10.(6) and/or DADR ANSP.80.(a)	The 'or' conjunction is not required as the requirement applies under both DADR regulations. Both may not apply to the organisation under consideration, which is self-explanatory that the other requirement (AIRCREW.10(6) or DADR.ANSP.80(a)) does not apply to the organisation.	DASA has removed 'or' and provided additional clarity in DADR.AVFM as to which DADR (DADR AIRCREW.10.(6) or DADR ANSP.80(a)) applies to whom.
29	AVFM.20 Proof	OIP from the AM vs the MAO/ANSP Also applies to AFM.30 Proof	Does the AM need to have their signature on these OIP or is it satisfactory for the AM to ensure the MAO/ANSP have these OIP?	It is satisfactory for the AM to ensure the MAO/ANSP have these OIP
30	AVFM.20.a Proof	7 Step RM	Is there a compliance period to document the controls as SFARP?	<p>See LSN18 re compliance proofs.</p> <p>DASA will provide a Transition Plan which includes guidance on the appropriate implementation time frame.</p>

LSN	NPA Reference	Comment or suggested change	Explanation	DASA Reply
31	AVFM.20.b.2 Proof	12 elements vs 4 components of DASR.SMS	This appears to be a very onerous proof to satisfy the 12 elements when the AMC only specifies the 4 components.	See LSN18 re compliance proofs. DASA removed all reference to '12 elements'.
32	AVFM.20.b.4 Proof	Benchmark information acceptable to DASA	Does this need to be accepted by DASA in advance of being implemented/approved by the AM? What happens whilst the MAO/ANSP are non-compliant with the proposed new DASR.AFM?	See LSN18 re compliance proofs. As with all DASR, the AM is required at some point to demonstrate compliance. The same process applies to AVFM. While under the transition period, the AM is expected to work towards compliance, balancing resources and other task priorities. However, DASA recognises that the AM cannot be held accountable for full compliance until the transition period has expired. Following the transition period the normal avenues available to DASA would apply if, during an oversight or assurance activity, the ANSP or MAO was found to be non-compliant.
33	AVFM 30.a	a. The AM must: 1. define normal and extended duty time limitations GM 2. define rostering practices	The method for how to comply and guidance belongs in AMC and GM respectively. The requirement shouldn't be clouded by method.	DASA has moved the obligation to define rostering practises from IR to GM.
34	AVFM 30.a GM	Include guidance to acceptable scientific resources	The current guidance provides nothing more than is logical to critical thinking. A commander needs guidance to which resources will support meeting the requirement.	The word scientific has been removed from AVFM 30.a. GM. Guidance on acceptable resources (scientific or otherwise) is available on request from DFSB (in relation to Fatigue Management Systems) and IAM (in relation to physiology). Please note, this guidance is limited to providing advice on resources known to DFSB or IAM. DFSB and IAM are not resourced to validate studies presented to them. DASA recommend the use of existing industry standards and guidance, along with the DAVFMG. Should an AM choose to initiate a field study or similar using Defence personnel, they should be aware of the need to meet Defence ethics requirements and to consult with IAM. GM has been added to this effect.

LSN	NPA Reference	Comment or suggested change	Explanation	DASA Reply
35	AVFM.30.a.2	Rostering practices	<p>There is no definition, GM or AMC provided for rostering practices.</p> <p>As example, AMG is very reactive and it is hard to roster pers. DAVFMG could go further WRT rostering definitions.</p>	<p>DASA has moved the obligation to define rostering practises from IR to GM.</p> <p>The AM has been provided the opportunity to define rostering as it applies to the AM's aviation systems, personnel who operate themn and the mission types conducted. This recognises that each aviation system is different and therefore flexibility is required. Further guidance is available in the DAVFMG.</p>
36	AVFM.30.b	Controls applied prior to task commencement	<p>Will the day of task require detailed fatigue and controls assessment or is this meant like a task consideration/auth point? Satisfying this governance we may take away from our core business and induce further fatigue proving we aren't or are fatigued</p>	<p>The risk of inducing fatigue in trying to prevent fatigue is recognised. Hence, the optimal balance is best achieved by the AM staff developing the 'controls applied prior to task commencement'—which may include 'task considerations/authorisation points'. Further guidance is available in the DAVFMG.</p>

LSN	NPA Reference	Comment or suggested change	Explanation	DASA Reply
37	AVFM.30.b	<p>The AM must establish methods to provide aviation fatigue risk control SFARP:</p> <ol style="list-style-type: none"> 1. that define how <ol style="list-style-type: none"> a. fatigue hazard identification and controls will be applied prior to task commencement b. to re-assess the task environment on the day c. to assess the suitability of normal and extended duty limitations provide aviation fatigue risk control SFARP 	<p>Re-authoring aims to improve readability.</p> <p>Replacing 'will likely' with 'could' is a lower level of probability.</p>	Accepted. DASA made changes accordingly.

LSN	NPA Reference	Comment or suggested change	Explanation	DASA Reply
37 cont.	AVFM.30.b	<p>2. provide aviation fatigue risk control SFARP that define how fatigue hazard identification and controls will be applied</p> <p>a. after task commencement</p> <p>b. when circumstances arise that will likely could place staff beyond defined duty time limitations before task completion GM</p> <p>3. ... Re-authoring aims to improve readability.</p>	<p>Re-authoring aims to improve readability.</p> <p>Replacing 'will likely' with 'could' is a lower level of probability.</p>	Accepted. DASA made changes accordingly.
38	AVFM Proof	Compliance period?	Is there a compliance period to allow FEGs to become compliant with this new DASR.AFM?	<p>See LSN18 re compliance proofs.</p> <p>DASA will provide a Transition Plan which includes guidance on the appropriate implementation time frame. A compliance timeframe of one year from publication of the AVFM regulation is anticipated.</p>
39	AVFM 30	Is the expectation that we will develop our own Fatigue manual (Sig body of work)?	Rostering – likely compliant however depending how it is defined. What is defined as Rostering Practices? AMG is very reactive and it is hard to roster pers. Guide could go further WRT rostering definitions.	No, there is no expectation that ANSPs or MAOs will develop their own fatigue manuals. However, ANSP and MAO OIP has to describe the practices in use and the controls applied to the hazard of fatigue in aviation.

LSN	NPA Reference	Comment or suggested change	Explanation	DASA Reply
40	AVFM.30 Proof	Evidence of scientific principals	<p>Do extant MAO fatigue policies satisfy the proof for scientific principals?</p> <p>Are scientific principals required to make long established MAO fatigue policies compliant?</p> <p>Does compliance with the DAVFMG satisfy scientific principal requirement?</p>	<p>See LSN18 re compliance proofs.</p> <p>1. Extant ANSP and MAO fatigue policies may be satisfactory. DASA recognises the value of operational knowledge and experience in determining the validity of extant AVFM OIP/controls.</p> <p>2. The word 'scientific' has been removed from DASR.AVFM.30.a. GM paragraph 3.</p>
41	General	Will a continuous improvement program be satisfied with a regular SI review cycle or will this wholly separate and distinct?		<p>Yes, a continuous improvement program would be satisfied through an ANSP or MAO demonstrating evidence of a regular review cycle, provided the review cycle was consistent with the ANSP or MAO's QMS.</p>

LSN	NPA Reference	Comment or suggested change	Explanation	DASA Reply
42	AVFM.30.a.2 Section 3	scientific reference data for FEG	<p>Evidence exists of fatigue-related scientific principles, operational knowledge and experience used in the organisation's DASR.AFM solution</p> <p>We can't find much historic 'scientific' reference material used to define our current ACG fatigue SI. We have mostly aligned our ACG SI with the Defence Aviation Fatigue Management Guidebook (DAVFMG). Can we assume this 'benchmark information (GM AFM.20.b.4)'which seems like the assumptions are based on science, allows us to meet this proposed requirement?</p> <p>Availability of Software – bio-mathematical fatigue modelling</p> <p>Will there be additional resources made available to units/wings if they want to use the endorsed SAFTE-TEST software (available from DFSB)? I believe ACG doesn't have any current licences and this software needs to be used on a standalone laptop. Is there scope to make this available on the DPN for ease of access....and storing results with associated RMPs etc? Additionally, this software can be labour intensive (aka fatiguing), so are there alternative quick and simple tools available?</p>	<p>See LSN18 re compliance proofs (ie Section 3 of the Draft DASR.AFM deals with compliance proofs).</p> <ol style="list-style-type: none"> 1. DASA deleted the word 'scientific' from the IR. 2. DASA has obtained a number of two year licences for SAFTE-FAST. A number of licences will be offered directly to environmental commands. Additional licences are available on request through the CIOG catalogue. Future renewals will be a command responsibility.

LSN	NPA Reference	Comment or suggested change	Explanation	DASA Reply
43	AVFM.30 Proof	DAVFMG	Does the DAVFMG and integration into an SI review cycle / SMS be considered sufficient for AFM.30 proofs?	See LSN18 re compliance proofs. DASA reserves judgement as to the sufficiency of '[implementation of] the DAVFMG and integration into an SI review cycle/SMS' in complying with AVFM.30 until a comprehensive review of an ANSP or MAO's solution is conducted through an oversight activity or similar.
44	AVFM 30.b	Will the day of task require detailed fatigue and controls assessment or is this meant like a task consideration/auth point?	Satisfying this governance we may take away from our core business and induce further fatigue proving we aren't or are fatigued	This can be a simple pre-duty checklist, conducted as a team effort or individual effort as appropriate. It is not intended to be cumbersome.

AUTHORITY

10. The content of this Comments Response Document has been reviewed and is authorised.

C POUNCEY

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