



NOTICE OF PROPOSED DASR AMENDMENT NPA 2019-08

INTRODUCTION OF AVIATION FATIGUE MANAGEMENT REGULATION DASR.AFM AND THE DEFENCE AVIATION FATIGUE MANAGEMENT GUIDEBOOK

INTRODUCTION

Applicability

1. This proposal is applicable to MAO and ANSP accountable for aircrew and air traffic controller employment groups.

Purpose

2. The purpose of this NPA is to introduce:
 - a. Defence Aviation Safety Regulation – Aviation Fatigue Management (DASR.AFM), including associated guidance material, acceptable means of compliance, and compliance proofs; and
 - b. Defence Aviation Fatigue Management Guidebook (DAFMG).
3. This NPA is an integral part of key stakeholder consultation to allow for comment and input to the regulation and DAFMG development prior to their formal release.
4. The proposed new regulation DASR.AFM is expected to:
 - a. Regulate the management of fatigue for MAO aircrew and ANSP air traffic controller employment groups, where regulation of these employment groups is consistent with international practice.
 - b. Be structured in a way that allows its use for any employment group (that may impact on aviation safety) where fatigue management is required. Based on DASA safety oversight and command input, the scope of DASR.AFM may vary to include additional employment groups.
 - c. Focus on organisations managing fatigue within their existing safety management system (SMS) in a way that is commensurate with their context. Defensible duty limitations and rostering practices will also be required to support fatigue management within the SMS.
 - d. Leverage the DAFMG to support commanders in developing a solution tailored to their context. The DAFMG is a major evolution of the DFSB-DASA Fatigue Guidance document and is now expressly designed to complement DASR.AFM.
 - e. Address the deficiency caused by cancellation, without replacement, of DI(AF) OPS 6-6 — *Crew Duty Limits* AL1 on 30 Aug 16.
 - f. Close out the CAF agreed to recommendation c in *The ADF Fatigue Paper* – D8771421:
 - a. **Agree** that DDAAFS, with SME Input from AVMED, will be responsible for assisting *development and implementation* of individual FEG fatigue management policies and ongoing review and endorsement of these policies.
 - g. Close out Advisory Circular AC 004/2019 - Aircrew Flight Time Limitations.



5. The benefits flowing from the proposal are expected to:
 - a. Support DASR Accountable Managers by providing a Defence contextualised regulation and supporting artefacts that will ensure defensible safety outcomes to manage aviation fatigue so far as reasonably practicable.
 - b. Provide DASA independent oversight for the regulated employment groups.
 - c. Allow for straightforward expansion of DASR applicability if a safety need is identified.

Background

6. DI(AF) OPS 6–6—*Crew duty limits* was cancelled on 30 Aug 16, resulting in the absence of fatigue management policy for Air Force. Fatigue Management was not regulated for any service through the legacy OAREG's nor the DASR when introduced. Noting that by international convention aviation fatigue management is regulated, the introduction of DASR.AFM was deemed essential and the Defence AA approved DCP 2019-08 on 17 May 19.

7. The applicability to aircrew and air traffic control employment groups was determined to be a defensible initial scope, with the Authority undertaking to monitor the need to expand to other employment groups and to adjust the scope as necessary.

Proposed Amendments

8. The proposed DASR.AFM can be viewed at Enclosure 1, and the DAFMG at Enclosure 2.

Implementation Strategy

9. DASR.AFM is unlikely to be in a mature state to be released with the next DASR amendment; scheduled late March 2021. Subject to the incorporation of feedback, an out of session mid-year 2021 release of DASR.AFM and DAFMG is planned.

10. The DASR.AFM implementation plan will be fully consulted by a dedicated ACPA DASR.AFM Implementation Manager prior to the release of DASR.AFM and DAFMG. NPA responses and continued consultation will further informing the community and DASA resourcing requirements including SME capacity and training requirements.

11. Supporting a planned two year implementation period, the broad implementation plan is:

Planned mid-year 2021:

- DASR and DAFMG release
- ACPA DASR.AFM Awareness Training commences
- DFSB training on DAFMG commences
- Fortnightly Webinars with ACPA/DFSB/IAM and other SMEs working through key DASR.AFM/DAFMG topics commence.

Planned mid-year 2022 – transition assessments (no-findings)

2022/2023 - Evolved additional webinars and targeted assistance based on transition assessment

Planned mid-year 2023 – DASA Compliance assessments

HOW TO SUBMIT COMMENTS ON THIS NPA

Format

12. Responses to this NPA are to be recorded on the NPA Response Sheet. The Authority requests that separate NPA Response Sheets are submitted for DASR.AFM (refer Annex A) and for DAFMG (refer Annex B).

13. Responses are to be submitted by email to [DASA](#). Hardcopies of the NPA Response Sheet are not required.



Timing

14. Comments on NPA 2019-08 are to be forwarded to DASA by close of business 28 Feb 21.

Additional Information

15. Additional information concerning this NPA is available from ACPA REGS1. Prior to the end CY2020 – SQNLDR Stefan Plazier (0466 604 107), from January 2021 – SQNLDR Aaron Barker contactable on 0423 374 229.

DISPOSITION OF RESPONSES RECEIVED

16. A Comment Response Document will be prepared and published on the [DASA Website](#). DASA will not individually acknowledge or respond to comments or submissions.

DR Smith

GPCAPT
Director
ACPA
Defence Aviation Safety Authority
02 6128 7301

Annexes:

- A. NPA 2019-08 - Response Sheet for DASR.AFM
- B. NPA 2019-08 - Response Sheet for DAFMG

Enclosures:

1. [Proposed DASR.AFM](#)
2. [DAFMG](#)



NPA 2019-08 Response Sheet for DASR.AFM

Please forward this sheet as an email attachment to [DASA](#) by 28 Feb 21. A word version of this response sheet can be found via obj no: [BO3960659](#) or alternatively contact [DASA](#).

Please indicate your acceptance or otherwise of this proposal by ticking the appropriate box below. Additional comments, suggested amendments or alternative action are welcome and may be provided on this response sheet or by separate correspondence.

- The proposal is **acceptable without change**.
- The proposal is **acceptable but would be improved if the following changes were made:**
- The proposal is **not acceptable but would be acceptable if the following changes were made:**

LSN	NPA Reference: (i.e Regulation number, NPA paragraph etc)	Comment or suggested change	Explanation
1			
2			
3			
4			
5			

RESOURCE IMPLICATIONS

Please provide specific comment on any significant resource implications that this proposal may have for your organisation, for both its implementation and ongoing compliance. Your comments should address both financial and human resource considerations.

Resource implications – Proposal implementation	
Resource implications – Proposal sustainment	



RESPONDENT DETAILS

Your name:	
Submission date:	
Your organisation:	
Email address:	
Postal address:	
Phone:	
Whose views are represented in your response? i.e. Is your response the authoritative response from your organisation?	Responding on behalf of : Individual [<input type="checkbox"/>] Regulated Military entity [<input type="checkbox"/>] Regulated Commercial entity [<input type="checkbox"/>] Wing HQ [<input type="checkbox"/>] Group HQ [<input type="checkbox"/>] ADF Regulatory, Technical or Logistics policy agency [<input type="checkbox"/>] Other commercial entity [<input type="checkbox"/>], Other [<input type="checkbox"/>] Please describe:
Do you consent to your name being published as an NPA respondent within the NPA Summary of Responses:	YES [<input type="checkbox"/>] NO [<input type="checkbox"/>]



NPA 2019-08 Response Sheet for DAFMG

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RESPONDENT DETAILS

Your name:	
Submission date:	
Your organisation:	
Email address:	
Postal address:	
Phone:	
Whose views are represented in your response? i.e. Is your response the authoritative response from your organisation?	Responding on behalf of : Individual [<input type="checkbox"/>] Regulated Military entity [<input type="checkbox"/>] Regulated Commercial entity [<input type="checkbox"/>] Wing HQ [<input type="checkbox"/>] Group HQ [<input type="checkbox"/>] ADF Regulatory, Technical or Logistics policy agency [<input type="checkbox"/>] Other commercial entity [<input type="checkbox"/>], Other [<input type="checkbox"/>] Please describe:
Do you consent to your name being published as an NPA respondent within the NPA Summary of Responses:	YES [<input type="checkbox"/>] NO [<input type="checkbox"/>]

