



DRAFT GUIDANCE –

Fatigue Management Program (FMP)



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GUIDANCE FOR FATIGUE MANAGEMENT PROGRAM (FMP)

Purpose

The purpose of this document is to provide guidance to operators on developing a fatigue management program (FMP). This guidance complements but does not supersede requirements under 700.215 of the *Canadian Aviation Regulations* (CARs). Additional resources can also be found under the [Fatigue Management Guide for Airline Operators](#) and the [Fatigue Management Guide for Helicopter Operators](#).

The Fatigue Management Program (FMP) must be included in the Company Operations Manual (COM) and be approved by your Principal Operations Inspector (POI) **if it is required by a regulation or an exemption**. Please see Annex C for a checklist of the conditions that must be met for a successful approval.

A summary of fatigue reports received must be available to your POI upon request. This summary report must include:

- The number of fatigue reports received to date;
- A summary of the reasons behind fatigue reports (e.g., scheduling, personal, weather, etc.);
- A summary of flight crew members' workload when they experienced fatigue events
- A summary of the length of flight crew members' rest and work periods prior to fatigue events; as well as,
- A summary of any immediate response or mitigation applied in response to a report (e.g., flight cancellation, route change, use of sleep in the cockpit or caffeine, extra monitoring of crew member for symptoms of fatigue etc.);
- A summary of the steps that were taken to address the reports (e.g., oral counseling, time free from duty, change to scheduling process, etc.)

If your organization has an established Safety Management System (SMS) or a Fatigue Risk Management System (FRMS) to manage fatigue, it is not necessary to create a new document or process. Simply use the template in Annex C to indicate how your organization meets the requirements and where the Fatigue Management Program elements are located.

Requirements for an FMP

Commitment to Managing Fatigue

The Fatigue Management Program (FMP) must be approved by the accountable executive, clearly state the organization's dedication to managing fatigue among flight crew members (FCMs) and communicated to all employees. The commitment should align with the core values that support the organization's mission and vision. It should also reflect the organization's dedication to continuously improving the FMP by conducting periodic assessments, such as surveys, suggestion boxes, team meetings, or other means, to ensure its effectiveness and alignment with industry best practices and the latest scientific principles to mitigating fatigue-related risks.

Policy Statement

The policy statement is a formal declaration that defines an organization's commitment, principles, and objectives for managing fatigue risks. The following outlines the key components that should be included in the FMP policy statement:

Purpose: Clearly define the purpose of the program. This may include fatigue-related risk mitigations to protect the health and safety of employees.

Scope: Clearly specify those to whom the program applies.

Definitions: Define key terms that are essential to understanding the FMP, such as:

- Fatigue
- Fatigue impairment
- Fatigue-related incidents

Note: Key terms do not need to be redefined if defined elsewhere, such as in the Canadian Aviation Regulations, and supporting Advisory Circulars.

Objectives and Actions: Clearly define the organization's objectives for managing fatigue and outline the actions to achieve it. This may be done through various actions, such as:

- Identify and Assess Fatigue Risks: Regularly assess work schedules, job demands, and employee well-being to identify situations where fatigue may become a risk.
- Implement Effective Scheduling Practices: Ensure that work schedules provide adequate rest periods appropriate to the operation, recognizing that regulatory limits may not adequately reflect all scenarios to ensure safe operations.
- Promote Fatigue Awareness: Promote fatigue awareness which includes at a minimum ongoing training and education to employees and supervisors

regarding new scientific research on fatigue, the signs and symptoms of fatigue, its effects on performance, and strategies to manage fatigue.

- Self-Reporting Fatigue and Monitoring: Provide a non-punitive means for FCM to self-report fatigue in which immunity from disciplinary action will be granted. Fatigue reports must be monitored and reviewed to ensure appropriate action is taken when fatigue levels are deemed to be unsafe.

Roles and Responsibilities

The FMP is based on the principle of shared responsibility, recognizing that all parties within the organization play an essential role in managing fatigue and must work together to support the goals of the FMP. The responsibility for managing fatigue risks lies with the organization, not the regulator. The success of the FMP is dependent on active engagement with the organization, making it essential for everyone to be involved from the start in understanding the FMP's intent and objectives. The FMP must outline the roles and responsibilities of those managing and implementing the FMP, as well as those to whom it applies.

All those applicable shall document confirmation they have received FMP training and understand their role and responsibility within the FMP. For example:

- Operations Manager, Chief Pilot
- Pilots
- Functional/Support Roles (Human Resources, Training Specialist, Scheduling, Dispatchers etc.)
- Other stakeholders, such as contractors and their employees

Note: *It is only necessary to identify the positions that are applicable to your organization and that play a role in managing fatigue – each organization may be different.*

Fatigue Awareness Promotion

Initial and ongoing fatigue training and education are essential for effective risk management, ensuring that all employees to whom the FMP applies remain engaged and informed to reduce safety hazards by recognizing fatigue, understanding its impact on performance, and implementing strategies to mitigate its effects. The FMP should clearly define the organization's training and education objectives and provide specific instructions or practices to be followed, including:

- *Types of training*— i.e., Initial training, Recurrent training
- *Format*— i.e., Computer-based, and/or Classroom; and if it is embedded in other training courses, e.g., CRM, Pilot Decision Making etc.
- *Frequency*— at a minimum: Annually
- *Duration*—i.e., Minimum training time. For example: 1 hour

Note: This training can be integrated into the existing training. If this is the case, please indicate which course contains the FMP training.

Procedure for Self-Reporting Fatigue

The FMP must have a procedure for flight crew members to self-report fatigue and fatigue-related hazards. The procedure must be non-punitive, meaning immunity from disciplinary action, to encourage flight crew members to submit fatigue reports, which will help address and identify any systemic fatigue risks.

This approach encourages transparency, allowing flight crew members to report fatigue concerns and identify systemic fatigue risks. An example of a template for a self-reporting fatigue that can be found in Annex A.

Procedure for Monitoring Fatigue

At a minimum, the FMP must establish a proactive procedure for the Operation Manager or their designate to monitor and review fatigue reports. The procedure may utilize tools such as checklists, regularly scheduled meetings, trend analytics, and performance metrics. The objective of the review is to determine clear steps to address the reported fatigue issues, if applicable. Additional fatigue monitoring is also encouraged; however, it should be commensurate with the complexity of the operations and organization.

Ongoing oversight will be integrated through regular process inspections and periodic targeted inspections, as deemed necessary.

ANNEX A - EXAMPLE OF NON-PUNITIVE FATIGUE REPORT

Note: when fatigue reports are summarized and reviewed, the name, date and signature must be de-identified to protect flight crew members privacy.

Name:

Date:

1. Circle fatigue level during the fatigue event:

Samn-Perelli Scale (SP) for the Fatigue Event:

1. Fully Alert – Wide awake, responding appropriately.
2. Very Alert – Extremely responsive, aware of surroundings.
3. Alert – Slightly more relaxed but still very responsive.
4. Somewhat Alert – Relaxed but still aware, with mild difficulty concentrating.
5. Drowsy – Difficulty maintaining focus, awareness is reduced.
6. Very Drowsy – Unable to concentrate, significant effort needed to stay awake.
7. Extremely Drowsy – Can't stay awake, may fall asleep at any moment.

Fatigue Event details:

2. What subpart are you operating under?
3. Was the fatigue event before/ after/ or during a flight duty period?
4. What was the start and end time of the flight duty period?
5. What was the length of the last flight duty period that took place prior to the fatigue event?
6. What was the start time and end time of the rest period prior to the flight duty period?
7. How many hours did you sleep during the rest period prior to the flight duty period?
8. How many consecutive flight duty periods did you work without a single day free from duty?
9. How many single days free from duty did you have in the last 28 days (or 33 days if applicable)?
10. What was your workload during the fatigue event:
 - a. How many flight segments?
 - b. What was the flight time during the flight duty period?
 - c. How many hours of work did you incur in the last of 7 days?
11. Were there other considerations, such as:
 - a. **Work-related:** schedule changes/ irregular schedule/ commute/ work stress/ time zone change/ hotel rest/ roster disruption/ don't know
 - b. **Non-work related:** woke up fatigued/ lack of sleep/ home or personal issues / health/ poor nutrition/ medications/ poor work-life balance/ environmental factors (i.e., loud air conditioner, pollution, rain)/ don't know.

I hereby certify that, to the best of my knowledge, the provided information is true and accurate.

ANNEX B – ASSESSING IF YOUR FMP MEETS THE REQUIREMENTS

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approved by PCi

ASSESSING IF YOUR FMP MEETS THE REQUIREMENTS

- ☐ Is the FMP included in the Company Operations Manual?
- ☐ Does the FMP have the commitment of the accountable executive?
- ☐ Does the FMP have a policy statement?
 - ☐ Is there a purpose?
 - ☐ Is there a scope?
 - ☐ Are there objectives?
 - ☐ Are there actions?
- ☐ Does the FMP have Roles and Responsibilities of those who manage and implement the FMP, as well as those to whom the FMP applies?
- ☐ Does the FMP have Fatigue Awareness Promotion which includes training and education (initial and recurrent)?
 - ☐ Is the training integrated existing Crew Resource Management (CRM) training?
 - ☐ If not, where is the training located/delivered?
- ☐ Does the FMP have a procedure for flight crew members to self-report fatigue?
- ☐ Does the example of a fatigue report include the minimum requirements:
 - ☐ The subpart
 - ☐ The time
 - ☐ The length of the FDP before the event and during, if applicable
 - ☐ The start and end time of the rest prior to the event
 - ☐ The number of hours slept during the last rest period
 - ☐ The number of consecutive FDPs without a single day free from duty
 - ☐ Number of single days free from duty in the last 28 days
 - ☐ The workload during the FDP
 - ☐ Confirmation statement by the flight crew member submitting the report of the accuracy to the best of their knowledge
- ☐ Is the self-reporting system non-punitive?
- ☐ Does the FMP have a procedure for monitoring fatigue?
 - ☐ Does this include the review of fatigue reports?
 - ☐ Is there a procedure to share information and risk mitigations with everyone to whom the FMP applies?

ANNEX C – FMP TEMPLATE

Example below

MANAGEMENT PROGRAM

POLICY STATEMENT

Purpose

Scope

Definitions

OBJECTIVES AND ACTIONS

ROLES AND RESPONSIBILITIES

FATIGUE AWARENESS PROMOTION

NON-PUNITIVE SELF REPORTING PROCEDURE

FATIGUE MONITORING

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