



**Submission to Inquiry into Managing Fatigue in Transport** (*Via E mail*)

The Asia Pacific Cabin Safety Working Group of the Australian Society of Air Safety Investigators wishes to make the following submission with regard to fatigue in air transport operations.

Fatigue is an unavoidable consequence of modern airline transport operations; however aircrew are further exposed to fatigue in ways that are not applicable to shift workers on the ground. ie they are

- required to work consecutive irregular shifts, i.e. day shift then night shift etc
- subject to the effects of circadian disruption.

Sleep disruption is almost always associated with international tours of duty. There is a large variation between individuals in the ability to sustain performance with long tasks, and cope with sleep disruption as a result of shift work and "jet-lag". Countermeasure strategies concentrate on minimising any sleep deficit which accumulates while on a tour of duty. We all tend to run our lives with an overdraft in our "sleep account", but this it is important not to let this overdraft get out of control in circumstances, when paying it back is more difficult, as a result of the work schedule. There is only one thing that will combat sleepiness and that is effective periods of sleep.

Flight attendants are required as safety professionals on airline operations to:

- maintain order and discipline in the cabin
- respond to in-flight cabin emergencies such as unruly behaviour, toilet fire, decompression etc
- respond to major aircraft emergencies during takeoff and landing.

Many aviation regulators not mandate duty time limits for cabin crew. Flight crew hours are regulated but cabin crew limitations are not. Terms of the appropriate workplace agreement may stipulate some limits but these are often able to be exceeded by an order from the flight's Captain.

The APCSWG endorses the International Civil Aviation Organisation (ICAO) requirement that cabin crew be included in a flight and duty time limits scheme. Such schemes should be based on current scientific research in the field of fatigue. These must take into account the differences (and similarities) in flight crew/cabin crew workload and environment.

The Asia Pacific Cabin Safety Working Group of ASASI believes fatigue in flight attendants is a significant issue that can impact on flight safety. It proposes that operators be required by CASA to develop flight and duty time schemes based on current scientific research. This was a submission to the Carriage of Persons Project Team which has resulted in the NPRM 9809RP, currently within the CASA process.

The Asia Pacific Cabin Safety Working Group appreciates the opportunity to make this submission.

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Internet Websites that are valuable resources with regard to fatigue in transport operations are:

NASA Fatigue Countermeasures Programme: <http://olias.arc.nasa.gov/zteam/>

University of South Australia Sleep Research.: [http://www.unisa.edu.au/sleep/main/tcsr\\_educ.html](http://www.unisa.edu.au/sleep/main/tcsr_educ.html)

Various sleep research centres: [http://www.yahoo.com.au/Health/Medicine/Sleep\\_Medicine/Institutes](http://www.yahoo.com.au/Health/Medicine/Sleep_Medicine/Institutes)