

IFATCA
GUIDANCE
FOR MEMBER
ASSOCIATIONS

EUR

Prepare for the 2 January 2020

On that date, the European Commission's implementation regulation 373/2017 comes into force. This lays down common requirements for providers of air traffic management/air navigation services and other air traffic management network functions and their oversight. It repeals Regulation (EC) No 482/2008, Implementing Regulations (EU) No 1034/2011, (EU) No 1035/2011 and (EU) 2016/1377 and amends Regulation (EU) No 677/2011.

IFATCA

International Federation of Air Traffic Controllers' Associations

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Dear Member Association of the IFATCA European Region,

The implementation regulation (IR) 373/2017 will come into force on the 2nd of January 2020. IFATCA has presented some of the challenges for the employers and its' member association with regard to some of the requirements formulated in the IR, to the European Regional Meeting 2017 in Loipersdorf, Austria. Following the feedback of some of the Member Association, this aide memoire shall assist your member association to establish an assessment if your employers are on time with the various requirement to be compliant with the Regulation.

This document provides you advice and guidance on how to assist your employer and your members to get it right and on time mainly with regard to the requirements to stress, fatigue and psychoactive substances. This is not meant as a duplication of the excellent explanations provided by EASA in its Easy Access Rules for ATM ANS, but rather as hands on check list or briefing to verify if your employer is proceeding on time and within the required focus on the transposition of the Regulation.

Should you have any questions or request to IFATCA please do not hesitate to contact Executive Vice-President Europe and/or the EASA coordinator.

Tom Laursen, IFATCA EVP Europe

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1. What are we talking about

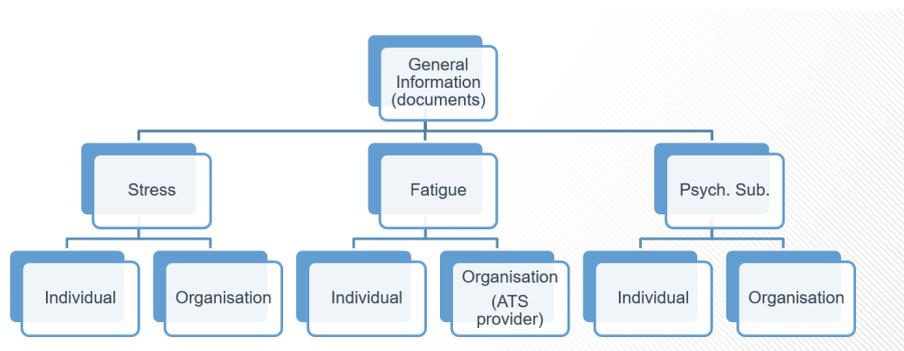
The Implementation Regulation 373/2017 introduces regulation for the common regulations for the **laying down common requirements for providers of air traffic management/air navigation services and other air traffic management network functions and their oversight.**

Certain elements such as safety management elements, including Just culture are dealt with in other regulations and this advice of IFATCA will mainly focus on **Stress, fatigue, psychoactive substance and alcohol in the operational environment.**

EASA has published an [EASA Access Rules](#) on this Implementation Regulation which gives a lot of good advice to the countries affected by this regulation. This IFATCA publication shall be taken as an aide-memoire for the member association of IFATCA.

The European Air Navigation Service Providers (ANSP) will have to comply with the IR and AMC prior to the 2nd of January 2020. To meet these deadlines the ANSP have to start to work now, in particular those ANSP not having any of the relevant measures in place.

The new legislative requirements do concern both the employer and the employee. Thus it is important that the elaboration of the compliance mechanism are carried out jointly by the employers and the representative of the ATM Staff. Some of the required compliance actions need a lot of work to be transposed. Therefore your association should by now be aware of the issues and involved in the transposition of the measures.



Source skyguide

2. How to USE this aide memoire?

This aide memoire will help you:

- To easily find out what changes need to be made in your ANSP on the topics of stress and fatigue, psychoactive substance and alcohol.
- To compare what your ANSP is proposing to be compliant versus what is required
- Assist the Member Association to be proactive in assisting the ANSP to get the introduction on time and in a proper way organized.
- Identify where you have gaps in your respective country and where you might wish support from IFATCA
- As annexes and possible reference you will find the current IFATCA policy on the subjects

The aide memoire is structured in the following way:

- The topic is introduced and explained
- A checklist is proposed to assist the Member Association to identify where there might be a need for further interaction with their employer
- Possible questions which could be asked to the employers
- The full text of the Implementation Regulation, the Acceptable Means of Compliance and the Guidance Material are provided

Being aware of the different national legal system, IFATCA proposes a variety of explanation and questions which might not be adequate for your particular country. A one size fits all approach is always challenging, but gives you the opportunity to verify certain arrangements related to the transposition of the implementation regulation.

This aide-memoire will assist you to identify if there are possible changes in the national and /or the aviation law need to be carried out to be compliant with the EASA requirements.

As Annex 3 you will find other publications and reference material published on these topics.

2.1. EU and EASA Implementation Regulation (IR), Acceptable Means of Compliance (AMC) and Guidance Material (GM)

Implementation Regulation is hard law and is formulated with "shall"

Acceptable Means of Compliance is soft law and is formulated with "should". If a state is approving a different AMC than what is being proposed, it has the obligation to prove that the Alternative Means of Compliance can fulfill the same level of compliance as the AMC.

Guidance material elaborates, gives further explanation and suggestion for both the IR and the AMC.

2.2. What this aide memoire will not cover?

The Implementation regulation 373/2017 comprises 10 articles and 13 annexes. The idea of this aide-memoire is not to reproduce all the requirements but rather to focus on the ones judged (by IFATCA) of relevance to the air traffic controllers and their representatives.

ATS.OR.300 Scope

Regulation (EU) 2017/373

This section establishes the requirements to be met by the air traffic control service provider with regard to human performance in order to:

- (a) prevent and mitigate the risk that air traffic control service is provided by air traffic controllers with problematic use of psychoactive substances;
- (b) prevent and mitigate the negative effects of stress on air traffic controllers to ensure the safety of air traffic;
- (c) prevent and mitigate the negative effects of fatigue on air traffic controllers to ensure the safety of air traffic.

3. Prevent and mitigate the risk that air traffic control service is provided by air traffic controllers with problematic use of psychoactive substances?

(a) An air traffic control service provider shall develop and implement a policy, with related procedures, in order to ensure that the problematic use of psychoactive substances does not affect the provision of air traffic control service.

(b) Without prejudice to provisions laid down in Directive 95/46/EC of the European Parliament and of the Council¹ and to the applicable national legislation on testing of individuals, the air traffic control service provider shall develop and implement an objective, transparent and non-discriminatory procedure for the detection of cases of problematic use of psychoactive substances by air traffic controllers. This procedure shall take into account provisions laid down in point ATCO.A.015 of Regulation (EU) 2015/340.

(c) The procedure in point (b) shall be approved by the competent authority.

3.1. What is the issue?

By the 2nd of January 2020 the Air Navigation Service Providers will have to put in place a system to be compliant with article ATS.OR.305 A). ANSPs will have to be able to prove that a system is in place that prevents ATCOs to work under the influence of psychoactive substances.

Psychoactive substance include alcohol, cocaine, methylphenidate, ephedrine, MDMA (ecstasy), mescaline, LSD, psilocybin mushroom, *Salvia divinorum*, Diphenhydramine, *Amanita muscaria*, Tylenol3, codeine, cannabis, hashish etc.

The obligations for the Air Navigation Service Providers are structured as follows: Information, Education and control and correction mechanism.

3.2. Checklist for Member Associations with regard to psychoactive substance:

		Yes	No
1	Does your ANSP have a policy including procedures to exclude the problematic use of psychoactive substance in place?		
2.	Has your ANSP created education and training material (e.g. leaflet or training)		
3	Has your ANSP made a support program ¹ available for ATCOs who might be dependent from psychoactive substance?		
4.	Has your ANSP created a procedure for the detection of cases of problematic use of psychoactive substance		

Should you as member association answer No to any of the above items you might wish to consider whether you need it or not. It is possible to request support from IFATCA.

¹ A support program comes into play when an ATCO reaches out for help or when colleagues feel that the ATCO needs professional help. Support programs should aim at integrating the ATCO following a possible suspension of work due to dependency.

3.3. Questions which could be asked with regard to psychoactive substance

These are a set of questions which could be asked. The list is not exhaustive and you might have other specific questions you wish to ask your employer.

1.	What does the policy cover?
	When will it be published
	Will the Association be involved in the elaboration or endorsement of such a policy?
2	What education and or training is planned?
	When will it be organized?
	What is the content of it?
3	If there is no support program ² available, when will the ANSP create one?
	What kind of support program is foreseen? What institutions or health organizations will be assisting the ANSP to such a program in place?
4	What procedure is foreseen to become compliant with the Implementation Regulation?
	If tests are foreseen:
	- Will they be random test?
	- Will they only be limited to suspicions?
	- Who will order the tests?
	- Who will carry out the tests?
	- Is the proposed form of the test legal? Does the any national legal text need to be adjusted? If so, when will this happen?
	- How will the testing be organized, by whom will the test be carried out?
	- What rights and duties does an ATCO has if he asked to perform a test?
	- What happens when a test is positive?
	- How is the non-discriminatory intention of the implementation Regulation respected?

Examples:

These examples are made to facilitate understanding of the issue. In no way are the depicting any of the existing ANSP. The examples are invented by the author of this document for illustrative purpose only.

For question 3

Example 1: Every three years, as part of the annual refresher training course air traffic controllers have to follow an information session with a specialist clinic on dependency. The ANSP has a contract with this clinic to manage possible dependences and as part of the contract training and education are provided to all staff of the ANSP including the ab-initio trainee.

Example 2: An air traffic controller has his driving license revoked by the police as s/he has been

² A support program comes into play when an ATCO reaches out for help or when colleagues feel that the ATCO needs professional help. Support programs should aim at integrating the ATCO following a possible suspension of work due to dependency

driving under the influence of alcohol. The revocation of his driver's licenses leads to the loss of the airport security clearance and the badge to get access to the Tower and Approach facility. The ANSPs proposes to the ATCO a rehabilitation program of 3 month in a specialist clinic with the obligation to follow an abstinence program lasting for 2 years, as counterpart that the ANSP vouch towards the Regulator that s/he receives the airport security clearance and the badge after the 3 month of rehabilitation program.

For questions 4

Example 1: Air Navigation Service Provider has the right by law to test the controller with regard to Alcohol. Each month a list of 5 ATCOs randomly selected will be asked to undergo a blood test. The blood samples are collected by the doctor which is located nearby the ATC Facility. The doctor is not an aeromedical doctor. The blood samples are being tested by a certified laboratory and the result is sent to the ANSPs doctors. In November 2018 the ANSP approaches the staff representative organization (Union and/or association) to discuss the possibility to extend the same procedure to psychoactive substance.

Example 2: The Air Navigation Service Provider is not allowed to perform any case of testing due to the prevailing law and advices the staff representative organization (Union and/or association) that they wish to discuss the possibility to agree between social partners to carry out tests both with regard to alcohol and substance abuse, in the light of the upcoming introduction of the Implementation Regulation 373/2017. During the discussion the social partner become aware that the national law has to be changed.

Example 3: The day after a Team party the Head of the Unit decides to have 3 ATCOs working a mid-day shift test for alcohol as he suspicious that they are working under the influence of alcohol. He calls the police to perform breathalyzer tests with the concerned ATCOs. The ATCOs refuse³ to perform the breath analyze and are accompanied by the police to the hospital where blood and hair samples are taken. The ATCOs are suspended for 48 hours until the results are known. The capacity is lowered and adjusted by the head of unit.

³ This is dependent of the prevailing national law in some countries. Where the national legislation does not foresee any procedure, then the ATCO representatives (Association / Union) might wish to define if a breath analyze can be refused due to some limitations.

4. Stress - In accordance with point ATS.OR.200, an air traffic control service provider shall:

(a) develop and maintain a policy for the management of air traffic controllers' stress, including the implementation of a critical incident stress management programme;

(b) provide air traffic controllers with education and information programmes on the prevention of stress, including critical incident stress, complementing human factors training provided in accordance with Sections 3 and 4 of Subpart D of Annex I to Regulation (EU) 2015/340.

4.1. What is the issue?

The ANSPs will have to create an overview on what Stressors are impacting the daily work of air traffic controller.

If not yet in place ANSP will have to create an educational program and training to be provided to ab-initio ATCOs and Air traffic controllers.

If not yet in place ANSP will have to create a Critical Incident Stress management program.

Given the time left till the introduction of the IR, the ANSPs not having a stress and CISM program in place will have to start rapidly to put it in place. The risk is that instead of introducing programs of quality the ANSP will focus on becoming compliant and not necessarily take the necessary care and resources which this important topic requires.

4.2. Check list for Member Associations related to Stress including CISM

		Yes	No
1.	Does your ANSP has a policy on Stress?		
2.	Has your ANSP created education and training material with regard to Stress?		
3.	Do you have in your ANSP an education on Stress at ab-initio		
4.	Do you have in your ANSP a training (re-current) program on Stress		
5	Do you have in your ANSP a Critical Incident Management System in place		

Should you as member association answer No to any of the above items you might wish to request support from IFATCA.

4.3. Question to be asked related to Stress

.1.	What does the policy cover?
	When will it be published
	Will the Association be involved in the elaboration of such a policy?
2.2.	What education and or training is planned?
	When will it be organized?
	What is the content of it?
2.3.	What education and or training is planned?
2.4.	Is there a special activity planned for ATCOs to keep them informed on the various aspects of the stress and its impact on the health of the ATCO?
	Is there a yearly survey and or assessment of stress planned?
	Is there any measures elaborated to reduce the impact of stress for the coming future (e.g. different break rules, massage at the workplace, thalassotherapy)
	How will the stress impact be monitored?
	How will the occurrence reporting be reflecting a possible stress contribution?
	Is it foreseen to address in a factual way the impact of stress on the operations based on the reports and or based on a pro-active/preventive way? If not, would you as association be able to propose this to management?
	Who will be assessing if an ATCO reports stress as a possible cause for the incident or operational incident?
	How do you protect privacy and possible medical secret issues related to an indication that an ATCO feel stressed?
	What measures will be taken to manage possible impact on the safety of operation generated through stress?
	How will the staff representative be associated to the elaboration of this stress related requirement?
2.5.	How will Critical Incident Management Program be introduced?
	What kind of CISM Program is foreseen?
	Who will provide training, organize the introduction of CISM, and coordinate the introduction and the maintenance of the program?
	How will be the peers be selected and trained?
	Are you aware that some ANSPs use ICISF ⁴ based standardized CISM program?

⁴www.icisf.org

5. Fatigue

ATS.OR.315 Fatigue

Regulation (EU) 2017/373

In accordance with point ATS.OR.200, an air traffic control service provider shall:

- (a) develop and maintain a policy for the management of air traffic controllers' fatigue;
- (b) provide air traffic controllers with information programmes on the prevention of fatigue, complementing human factors training provided in accordance with Sections 3 and 4 of Subpart D of Annex I to Regulation (EU) 2015/340.

5.1. What is the issue?

In a 24/7 working environment fatigue is one of the main challenges for the employees and the employers. In particular in Air traffic control where at any given moment of the day or night peaks in air traffic can occur, the need to carefully assess the impact of fatigue on the safety of the operations is evident. With the new regulation the Air Navigation service provider will have to create and maintain a policy to manage the fatigue of air traffic controllers and provide programs which inform the ATCO on the prevention of fatigue. There might be an issue with regard to the rosters and the overtime ATCOs are providing which can create fatigue. If an ATCOs indicates that s/he feels fatigued and that this could be the reason for an incident, issues linked to privacy and medical secret will have to be addressed by the social partners before introducing such a fatigue related policy. Rostering system contribute greatly to a regulated approach to the

5.2. Check list for Member Associations related to Fatigue

		Yes	No
1.	Does your ANSP has a policy on Fatigue?		
2.	Has your ANSP created education and training material with regard to Fatigue?		
3.	Do you have in your ANSP an education on Fatigue		
4.	Do you have in your ANSP a training (re-current) program on Fatigue		
5	How will your ANSP introduce a fatigue prevention program, who will be involved in the elaboration?		

Should you as member association answer No to any of the above items you might wish to request support from IFATCA.

5.3. Question to be asked related to Fatigue

1.	What does the policy cover?
	When will it be published
	Will the Association be involved in the elaboration of such a policy?
2.	What education and or training is planned?
	When will it be organized?
	What is the content of it?
3.	Is there a special activity planned for ATCOs to keep them informed on the various aspects of the fatigue and its impact on the health of the ATCO?
	Is there a yearly survey and or assessment of fatigue planned?
	Is there any measures elaborated to reduce the impact of fatigue?
	How will the fatigue impact be monitored?
	How will the occurrence reporting be reflecting a possible fatigue contribution?
	Who will be assessing if an ATCO reports fatigue as a possible cause for the incident or operational incident?
	Is it foreseen to address in a factual way the impact of fatigue on the operations based on the reports and or based on a pro-active/preventive way? If not, would you as association be able to propose this to management?
	What measures will be taken to manage possible impact on the safety of operation generated through fatigue?
	How will the staff representative be associated to the elaboration of this fatigue related requirement?
	Will your employer take into account the ICAO fatigue manual to set up a Fatigue management system?

6. Rostering Systems

ATS.OR.320 Air traffic controllers' rostering system(s)

Regulation (EU) 2017/373

(a) An air traffic control service provider shall develop, implement and monitor a rostering system in order to manage the risks of occupational fatigue of air traffic controllers through a safe alternation of duty and rest periods. Within the rostering system, the air traffic control service provider shall specify the following elements:

- (1) maximum consecutive working days with duty;
- (2) maximum hours per duty period;
- (3) maximum time providing air traffic control service without breaks;
- (4) the ratio of duty periods to breaks when providing air traffic control service;
- (5) minimum rest periods;
- (6) maximum consecutive duty periods encroaching the night time, if applicable, depending upon the operating hours of the air traffic control unit concerned;
- (7) minimum rest period after a duty period encroaching the night time;
- (8) minimum number of rest periods within a roster cycle.

(b) An air traffic control services provider shall consult those air traffic controllers who will be subject to the rostering system, or, as applicable, their representatives, during its development and its application, to identify and mitigate risks concerning fatigue which could be due to the rostering system itself.

AMC1 ATS.OR.320(a)(6);(7) Air traffic controllers' rostering system(s)

ED Decision 2017/001/R

NIGHT TIME

Night time should be considered as the time between midnight and 05.59.

6.1. What is the issue

Roster system have evolved over time and are part in many countries of the labor agreement between Air traffic control representatives and the ANSP. Multiple criteria do influence a roster system. Fatigue being just one of the elements. The new regulation requires the ANSP to verify if the ATCO rostering system is a system which does respect the elements of operational fatigue. Certain limits to roster and overtime are being required by the new implementation regulation. E.g. working between 12 and 27 days in a row might not be possible anymore. Double shift neither as from a fatigue point of view these are elements which might not be agreed.

To change roster system to respect the intention of the IR will need a pragmatic approach by those parties who negotiate the roster system.

6.2. Check list for Member Associations related to Roster systems

		Yes	No
1.	Is it foreseen to assess the current roster system with regard to operational fatigue?		
2.	Has your association been invited for the consultation		
3.	Are there any elements of a) 1-8 which are not defined in your current roster system?		
4.	Are you aware of a possible study on the impact of the current roster system on operational fatigue?		
	Does the company roster personnel follow good scientific principles of stress, fatigue when creating plans?		

Should you as member association answer No to any of the above items you might wish to request support from IFATCA.

6.3. Question to be asked related to Roster system

.1.	When will the association/Union be associated to the work which has to be carried out
-----	---

Annex I

The proposed IR, AMC and GM the relevant articles

ATS.OR.305 Responsibilities of air traffic control service providers with regard to the problematic use of psychoactive substances by air traffic controllers

Regulation (EU) 2017/373

(a) An air traffic control service provider shall develop and implement a policy, with related procedures, in order to ensure that the problematic use of psychoactive substances does not affect the provision of air traffic control service.

(b) Without prejudice to provisions laid down in Directive 95/46/EC of the European Parliament and of the Council and to the applicable national legislation on testing of individuals, the air traffic control service provider shall develop and implement an objective, transparent and non-discriminatory procedure for the detection of cases of problematic use of psychoactive substances by air traffic controllers. This procedure shall take into account provisions laid down in point ATCO.A.015 of Regulation (EU) 2015/340.

(c) The procedure in point (b) shall be approved by the competent authority.

AMC1 ATS.OR.305(a) Responsibilities of air traffic control service providers with regard to the problematic use of psychoactive substances by air traffic controllers

ED Decision 2017/001/R

POLICY AND PROCEDURES

Within the context of the policy, the air traffic control service provider should:

(a) provide training or educational material to air traffic controllers relating to:

(1) the effects of psychoactive substances on individuals and subsequently on air traffic control service provision;

(2) established procedures within its organisation regarding this issue; and

(3) their individual responsibilities with regard to legislation and policies on psychoactive substances.

(b) make available appropriate support for air traffic controllers who are dependent on psychoactive substances;

(c) encourage air traffic controllers who think that they may have such a problem to seek and accept help made available by their air traffic control service provider;

(d) ensure that air traffic controllers are treated in a consistent, just and equitable manner as regards the problematic use of psychoactive substances; and

(e) establish and implement principles and procedures for occurrence investigation and analysis to consider the problematic use of psychoactive substances as a contributing factor.

GM1 ATS.OR.305(a) Responsibilities of air traffic control service providers with regard to the problematic use of psychoactive substances by air traffic controllers

ED Decision 2017/001/R

POLICY

(a) Guidance for the development and implementation of the policy is contained in ICAO Doc 9654 'Manual on Prevention of Problematic Use of Substances in the Aviation Workplace', First Edition - 1995, and in particular:

- (1) Attachment A (pp. 27–34) as regards elements for the definition and the implementation of policy and programme;
- (2) Chapter 3 (pp. 9–12) as regards the identification, treatment, and rehabilitation of staff, with related supporting material, available in Attachment C (pp. 61–68); and
- (3) Attachment D (pp. 69–75) as regards the employment consequences of problematic use of substances.

TRAINING AND EDUCATION PROGRAMMES

(b) Guidance for the development and implementation of training and education programmes is contained in ICAO Doc 9654 'Manual on Prevention of Problematic Use of Substances in the Aviation Workplace', First Edition - 1995, in particular:

- (1) Chapter 2 (pp. 6–7) as regards the education of the workforce and educational material, with related supporting material available in Attachment A (pp. 35–48); and
- (2) Attachment B (pp. 49–59) and Attachment F (pp. 87–94), where extracts from the ICAO Manual of Civil Aviation Medicine are provided

GM2 ATS.OR.305(a) Responsibilities of air traffic control service providers with regard to the problematic use of psychoactive substances by air traffic controllers

ED Decision 2017/001/R

THIRD PARTY ASSISTANCE TO AIR TRAFFIC CONTROLLERS

The air traffic control service provider may employ third-party assistance. Such assistance should be made freely available to air traffic controllers who are dependent on psychoactive substances.

AMC1 ATS.OR.305(b) Responsibilities of air traffic control service providers with regard to the problematic use of psychoactive substances by air traffic controllers

ED Decision 2017/001/R

PROCEDURE FOR THE DETECTION OF CASES OF PROBLEMATIC USE OF PSYCHOACTIVE SUBSTANCES

The objective, transparent and non-discriminatory procedure should specify:

- (a) the mechanisms and responsibilities for its initiation;
- (b) its applicability in terms of timing and locations;
- (c) the person(s)/body responsible for testing the individual;
- (d) the testing process;
- (e) thresholds for psychoactive substances;
- (f) the process to be followed in case of detection of problematic use of psychoactive substances by an air traffic controller; and
- (g) the appeal process.

GM1 ATS.OR.305(b) Responsibilities of air traffic control service providers with regard to the problematic use of psychoactive substances by air traffic controllers

ED Decision 2017/001/R

PROCEDURE FOR THE DETECTION OF CASES OF PROBLEMATIC USE OF PSYCHOACTIVE SUBSTANCES

Guidance for the development and implementation of the procedure for detection of cases of psychoactive substances is contained in ICAO Doc 9654 'Manual on Prevention of problematic use of Substances in the Aviation Workplace', First Edition - 1995, particularly in Chapter 5 (pp. 15–23) and Attachment E (pp. 77–85) as regards biochemical testing programmes, with related supporting material.

ATS.OR.310 Stress

Regulation (EU) 2017/373

In accordance with point ATS.OR.200, an air traffic control service provider shall:

- (a) develop and maintain a policy for the management of air traffic controllers' stress, including the implementation of a critical incident stress management programme;**
- (b) provide air traffic controllers with education and information programmes on the prevention of stress, including critical incident stress, complementing human factors training provided in accordance with Sections 3 and 4 of Subpart D of Annex I to Regulation (EU) 2015/340.**

GM1 ATS.OR.310 Stress

ED Decision 2017/001/R

EXPLANATION OF THE FUNDAMENTALS OF STRESS

(a) Introduction

(1) The job of an air traffic controller is considered to be responsible and demanding, and at times can lead to the experience of high levels of stress. The combination of skills and knowledge required to complete air traffic control tasks is wide. Visual spatial skills, perception, information processing, image and pattern recognition, prioritising, logical problem-solving, application of rules and procedures and decision-making form core skills to which we can add interpersonal communication, teamwork and technical vocabulary usage.

(2) Air traffic control also requires to constantly adapt to an ever-changing traffic picture and work environment within restricted time constraints. This has the potential to lead to considerable work pressure. In contrast, there may be times when traffic flows are low and controllers experience relatively low levels of activity. For some controllers, this may bring its own kind of stress due to the increased efforts required to maintain vigilance under light traffic load.

(3) Thus, the work of an air traffic controller has the potential to induce high levels of stress; however, the stress experienced by controllers is always unique to the individual and their interaction with their environment.

(4) 'Stress' is a term that is in common use within everyday language and can mean different things to different people depending on the context in which it is used. In lay terms, stress is often used to describe an external pressure experienced by an individual whilst at the same time encompassing the subjective experience of this pressure. Usually the term is used in a negative way. In this sense, the lay use of the term 'stress' encompasses both the cause and the effect, and this can lead to confusion as to its meaning.

(b) Technical definitions of stress

(1) Even in its technical use, the word 'stress' is sometimes used when the term 'stressor' (or pressure) would be more appropriate, referring to the cause of a stress experience. Stressors can be internal (cognitive or physical) or external (environmental) to the individual and may be defined as any activity, event or other stimulus that causes the individual to experience stress.

(2) It is helpful to clarify the way the term 'stress' and other technical terms are used. For the purposes of this guidance material, stress is defined following the Transactional Model of Stress. This views stress as the outcomes experienced by an individual when faced with a potentially stressful event. The experience of the event as negatively stressful (distress), neutral or positive (eustress) is based on the individual's perception of their ability to manage the event. Under this definition, stress is a manifestation in the individual of usually negative effects, which can lead to a decrease in performance and negative health effects.

(3) A stressor can also act to improve performance when it is a stimulus to increase arousal and improves the outputs of an individual in the short to medium term. Too much arousal paradoxically leads to an inverse effect and subsequent detriment in performance.

(4) Acute stress is, as its name suggests, episodic and occurring for short periods of time. In most cases, the cause of the stress is eliminated by the air traffic controller taking action to manage the situation leading to stress. High levels of acute stress may lead to hyper-arousal and may leave an air traffic controller feeling exhausted. It is important to identify work situations that lead to this acute stress and manage this within the work schedule.

(5) Chronic stress differs from acute stress only in that it is ongoing and even low levels of continuous chronic stress can lead to performance degradation and serious health implications, if it is not addressed. Chronic stress is insidious in its nature and a sufferer may become so accustomed to the sensations that they are unaware of the long-term negative effects. Chronic stress commonly leads to a sense of inability to cope.

(6) Both acute and chronic stresses have the potential to lead individuals into hyper-aroused states which may result in panic where task and skill performance, planning, reasoning and judgement are significantly impaired. In such instances, a well-practised but incorrect action, for that particular circumstance, may be performed when an alternative and more appropriate response is required.

(7) Chronic stress may result in a condition known as burnout. Burnout is generally identified by the following characteristics: disaffection with the job leading to a decrease in motivation with an associated decrease, perceived or otherwise, in performance.

(c) Sources of stress

Broadly speaking, the stress experienced by an air traffic controller at work is a function of their underlying background levels of stress, related to lifestyle, health and well-being, personality, organisational/work environment, levels of satisfaction with life generally, and the acute stress imposed by and operational conditions at any given time. There are three major sources of stress: environmental, work-related, and personal.

(1) Environmental/physical stressors

(i) Physical stressors are underlying conditions that can either be internal to the body (e.g. pain, hunger, lack of sleep, exhaustion), or external environmental factors (e.g. noise pollution, overcrowding, excess heat). The common factor among all of these stressors is that they all create a physically uncomfortable environment that can cause stress. Stress is not solely dependent on the intensity of a stimulus, but also on the duration of exposure. For example, a low-pitched but persistent noise can cause as much stress as a sudden loud noise.

(ii) In the air traffic control room, some common environmental/physical stressors could be:

(A) uncomfortable temperature; B) cramped workspace;

(C) air quality;

(D) lighting conditions; and

(E) intrusive noise or vibration.

(2) Work-related stressors

(i) Stress in the workplace can come from a variety of sources besides physical stimuli. Some of these include:

(A) continuing high levels of workload near or above the maximum traffic handling capacity of an air traffic controller;

(B) a heterogeneous traffic mix where aircraft have varying levels of equipment and considerable variability in pilot skills;

(C) unsuitable or unreliable equipment;

(D) inappropriate, vague procedures;

(E) complex equipment which is insufficiently understood or mistrusted;

(F) supervision of trainees or less experienced colleagues;

(G) workload and task breakdown not being matched to the level of technical skill of the controller, lack of support or too much support (interference);

(H) role ambiguity, where it is unclear where the responsibilities lie;

(I) interpersonal conflict with colleagues, other professionals;

(J) poor management relations (social dialogue), working conditions, e.g. rostering; and

(K) unusual or emergency situations.

(ii) Incidents, including emergencies and accidents, that lead controllers to feel that they are not coping may lead to the experience of critical incident stress; this, in turn, may impair performance in varying degrees.

(3) Personal stressors

(i) Personal stressors include the range of events that occur throughout people's lives but external to the workplace. The belief that such stressors can be left at home, however, is a myth, and these personal stressors accompany air traffic controllers to work every day.

(ii) Personal issues such as health, personal life, living situation and major life events (deaths, births, marriages, and moving house) add to the background level of stress that individuals have to cope with. Where these are excessive, they can interfere with work due to the distraction they cause and the mental effort they require to resolve them.

(iii) Stress is also considered to have a contagious quality, which happens when a stressed person or stressed persons create stressful situations for those around them. **(d) Signs of stress in the individual**

Signs of stress are many and varied. Some of the most commonly observed are shown below:

(1) Physiological

(i) Cardiovascular: increased pulse rate, elevated blood pressure, chest pains;

(ii) Respiratory: shortness of breath, tightness of chest, hyperventilation, dizziness;

(iii) Gastrointestinal: loss of appetite, gas pain, abdominal cramps, indigestion, diarrhoea, nausea;

(iv) Sweaty palms;

(v) Aching neck, jaw and back muscles;

(vi) Trembling;

(vii) Sleep disturbance, tiredness;

(viii) Itching;

(ix) Getting easily startled;

(x) Susceptibility to minor illnesses; and

(xi) Other: headaches, muscular tension, general weakness, psychosomatic symptoms.

(2) Psychological

(i) Emotional: anger, guilt, mood swings, low self-esteem, depression and anxiety;

(ii) Concentration problems, forgetfulness;

(iii) Pessimism;

(iv) Difficulty in making decisions;

(v) Irritability;

(vi) Loss of interest;

(vii) Loss of self-control; and

(viii) Loss of confidence.

(3) Behavioural

(i) Self-medication, drugs or alcohol;

(ii) Excess fatigue;

(iii) Sleep disruption;

(iv) Social withdrawal;

(v) Absenteeism;

(vi) Staff turnover rates; and

(vii) Job performance decrements.

(e) Impact of stress on air traffic controllers' performance of air traffic control tasks

Any source of stress has the potential to create unique subjective experiences in different individuals, and these may be positive or negative experiences or something in between.

(f) Negative experiences of stress

There is a number of ways in which stress experienced by air traffic controllers can be manifested in the performance of air traffic control tasks. Some of these are listed in Table 1, but, in general terms, performance of tasks decreases due to the detrimental effects that high levels of stress can have on perception, awareness, decision-making and judgement. In the longer term, health and well-being may also be compromised, leading to decreased performance of air traffic controllers. Table 1 below shows the effects on air traffic controller performance which can be linked to stress and which can potentially have very significant implications for the safety performance of an operation. Difficulty in concentrating and reduced vigilance — easily distracted.

Errors, omissions, mistakes, incorrect actions, poor judgment and memory.
Tendency to cut corners, skip items and look for the easiest way out.
Either slowness (due to lack of interest) or hyperactivity (due to adrenaline).
Focusing on easily manageable details while ignoring serious threats.
Tendency to pass responsibility on to others.
Fixation on single issues or even a mental block.
Unwillingness to make decisions — decisions are postponed or take longer to be made.
Fewer plans and backup plans are made.
Increase in risk-taking, leading to an increase in the number of violations, especially when frustrated with failures.
Excessively hurried actions — due to adrenaline and alertness level, there is a tendency to act very quickly even when there is no time pressure. Hurried actions increase the chance of errors.
In cases of significantly high stress, a controller will often: (1) return to old procedures that may no longer be applicable, appropriate or safe; (2) use non-standard phraseology when communicating; (3) return to the use of one's native language; and/or (4) look for items in a place where they used to be, but are no longer located.

Table 1: Effects of stress on physical and mental performance of air traffic control tasks

(g) Mitigation of stress in the individual and the organisation

Air traffic control service providers have a duty to take care of their employees and the customers of their services. They should aim at mitigating the negative effects of stress. This is best achieved by ensuring that a range of preventative measures as well as countermeasures are in place. These include:

- (1) adoption of a stress policy and/or a critical incident stress management policy within the organisation;
- (2) completion of regular risk assessment of sources of occupational stress and its effects on individuals and operations;
- (3) employee stress level monitoring;
- (4) adoption of stress intervention/mitigation/prevention practices and, where the organisation identifies a source of stress, use of a stress team/committee;
- (5) stress management training for all levels of employees;
- (6) education and prevention programmes on stress; and
- (7) staff support mechanisms (e.g. peer counselling, professional support from health practitioners, critical incident stress management (CISM) programmes);
- (8) adequate rostering allowing time to evacuate stress; and
- (9) promotion of sports or relaxation activities.

AMC1 ATS.OR.310(a) Stress

ED Decision 2017/001/R

STRESS MANAGEMENT POLICY

- (a) The air traffic controllers' stress management policy should:
- (1) declare the commitment to proactively and systematically monitor and manage stress, and describe the expected benefits for the safety of operations;
 - (2) be signed by the accountable manager;
 - (3) reflect organisational commitments regarding the implementation of a critical incident stress management programme;
 - (4) be communicated, with visible endorsement, throughout the air traffic control service provider;
 - (5) include the commitment to:
 - (i) provide appropriate resources;
 - (ii) consider the best practices;
 - (iii) enforce stress management programme(s) as a responsibility of managers, staff involved in stress management and air traffic controllers;
 - (6) be periodically reviewed to ensure it remains relevant and appropriate.
- (b) In accordance with the policy in point (a), the air traffic control service provider should establish and implement:
- (1) procedures for critical incident stress management;
 - (2) principles and procedures to enable stress reporting;
 - (3) principles and procedures for occurrence investigation and analysis to consider stress as contributing factor; and
 - (4) method(s) for the identification and management of the effect of air traffic controllers' stress on the safety of operations.

GM1 ATS.OR.310(a) Stress

ED Decision 2017/001/R

CRITICAL INCIDENT STRESS MANAGEMENT

The purpose of critical incident stress management (CISM) programmes is to prepare an organisation for the potential aftermath of an incident. These programmes come in a number of different forms, but have the added benefit of providing education on the effects of stress, how stress affects performance and stress management, even when the incident is relatively minor and perhaps personal to the individual

Guidance for the implementation of a CISM programme may be found in the EUROCONTROL document: 'Human Factors — Critical Incident Stress Management: User Implementation Guidelines', edition 2.0 of 24 October 2008.

GM1 ATS.OR.310(b) Stress

ED Decision 2017/001/R

INFORMATION AND EDUCATION PROGRAMMES

Scientific material proposed as guidance for information and education programmes on stress may be found in the EUROCONTROL document 'Human Factors Module — Stress', edition 1.0 of 15 March 1996.

ATS.OR.315 Fatigue

Regulation (EU) 2017/373

In accordance with point ATS.OR.200, an air traffic control service provider shall:

- (a) develop and maintain a policy for the management of air traffic controllers' fatigue;
- (b) provide air traffic controllers with information programmes on the prevention of fatigue, complementing human factors training provided in accordance with Sections 3 and 4 of Subpart D of Annex I to Regulation (EU) 2015/340.

GM1 ATS.OR.315 Fatigue

ED Decision 2017/001/R

EFFECTS OF FATIGUE

Guidance material on fatigue and its effects on safety-relevant aviation professionals may be found in Chapter 2 'Scientific principles for fatigue management' of ICAO Doc 9966 'Manual for the Oversight of Fatigue Management Approaches', second edition 2016.

AMC1 ATS.OR.315(a) Fatigue

ED Decision 2017/001/R

FATIGUE MANAGEMENT POLICY

(a) The air traffic controllers' fatigue management policy should:

- (1) declare the commitment to proactively and systematically monitor and manage fatigue and describe the expected benefits for the safety of operations;
- (2) be signed by the accountable manager;
- (3) address the mitigation of the operational impact of air traffic controllers' fatigue;
- (4) be communicated, with visible endorsement, throughout the air traffic control service provider;
- (5) include a commitment to:
 - (i) consider the best practices;
 - (ii) provide appropriate resources; and
 - (iii) enforce fatigue management as a responsibility of managers, staff involved in fatigue management procedures and air traffic controllers;
- (6) be periodically reviewed to ensure it remains relevant and appropriate.

(b) In accordance with the policy in point (a), the air traffic control service provider should establish and implement:

- (1) principles and procedures to enable fatigue reporting;
- (2) principles and procedures for occurrence investigation and analysis to consider fatigue as contributing factor;
- (3) procedures for the identification and management of the effect of fatigue on the safety of operations.

GM1 to AMC1 ATS.OR.315(a) Fatigue

ED Decision 2017/001/R

FATIGUE TAXONOMY

When establishing procedures to enable air traffic controllers to report when fatigued, an associated taxonomy for fatigue should be established.

GM2 to AMC1 ATS.OR.315(a) Fatigue

ED Decision 2017/001/R

FATIGUE IN OCCURRENCE INVESTIGATION AND ANALYSIS

Fatigue may have a significant impact on the performance of air traffic controllers and consequently on the safety of air operations. Therefore, when investigating occurrences, the air traffic control service providers should analyse the occurrence for fatigue as a contributing factor.

The analysis of available occurrence reports where fatigue was identified as contributing factor, generated by the air traffic control service providers or by other sources, could support the implementation and the improvement of fatigue management.

GM3 to AMC1 ATS.OR.315(a) Fatigue

ED Decision 2017/001/R

IDENTIFICATION AND MANAGEMENT OF THE EFFECT OF FATIGUE ON THE SAFETY OF OPERATIONS

(a) The following non exhaustive list contains some of the initiatives that the air traffic control service provider may undertake in order to identify air traffic controllers' fatigue:

(1) establishment of a procedure allowing air traffic controllers to report when fatigued, and promotion of its use. Templates for such reporting procedure could be established;

(2) utilisation of system support to manage rostering principles and thresholds established in accordance with ATS.OR.320, also highlighting criticalities in advance;

(3) undertaking fatigue surveys;

(4) application of scientific principles on fatigue and fatigue management and their effect on the operational and organisational context. (b) The knowledge and understanding of the underlying scientific principles of fatigue, as well of its potential impact on the safety of operations, may represent a considerable added value for the effectiveness of fatigue management arrangements established within the organisation. For this purpose, the air traffic control service provider might consider making available education and information programmes for staff involved in fatigue management, such as operational and safety managers, staff in charge of managing the rostering system, staff in charge of occurrence investigation.

(c) Activities air traffic control service providers could undertake to monitor the effectiveness of the established fatigue management arrangements may be but are not limited to the following:

(1) verification of the allocation and implementation of duty and rest periods in accordance with the rostering principles established in ATS.OR.320;

(2) collection and analysis of data related to planned versus achieved rosters, and in particular:

(i) exceedances of planned working hours and reasons generating exceedances;

(ii) variation of the nature of the duty (office work, operational air traffic control service provision, training, etc.);

(iii) operational circumstances which required a modification of established duty and rest periods; and

(iv) swapped shifts between air traffic controllers and impact on the established fatigue management principles;

(3) verification of the use and of the effectiveness of the procedure allowing air traffic controllers to self-declare fatigue, when such procedure is established; and

(4) analysis if specific roster patterns generate fatigue and, as a consequence, sickness or cases of provisional inability in accordance with Commission Regulation (EU) 2015/340.

GM1 ATS.OR.315(b) Fatigue

ED Decision 2017/001/R

INFORMATION PROGRAMMES

Information programmes may consist of lectures, leaflets, posters, CDs, and any other informative material to raise the awareness of the effects of fatigue on the individuals and on air traffic control service provision, and to advise on the need and the means to manage it. When choosing the most appropriate information programme and the medium, the air traffic control service provider should evaluate the level of awareness of its staff of fatigue management, the type of operations (e.g. single-person operations, nightshifts), and the periodicity of human factors training in the scope of refresher training.

GM2 ATS.OR.315(b) Fatigue

ED Decision 2017/001/R

INFORMATION PROGRAMMES

Scientific material proposed as guidance for information programmes on fatigue may be found in the document 'Fatigue and Sleep Management: Personal strategies for decreasing the effects of fatigue in air traffic control' (Brussels: Human Factors Management Business Division (DAS/HUM), EUROCONTROL, 2005).

ATS.OR.320 Air traffic controllers' rostering system(s)

Regulation (EU) 2017/373

(a) An air traffic control service provider shall develop, implement and monitor a rostering system in order to manage the risks of occupational fatigue of air traffic controllers through a safe alternation of duty and rest periods. Within the rostering system, the air traffic control service provider shall specify the following elements:

- (1) maximum consecutive working days with duty;
- (2) maximum hours per duty period;
- (3) maximum time providing air traffic control service without breaks;
- (4) the ratio of duty periods to breaks when providing air traffic control service;
- (5) minimum rest periods;
- (6) maximum consecutive duty periods encroaching the night time, if applicable, depending upon the operating hours of the air traffic control unit concerned;
- (7) minimum rest period after a duty period encroaching the night time;
- (8) minimum number of rest periods within a roster cycle.

(b) An air traffic control services provider shall consult those air traffic controllers who will be subject to the rostering system, or, as applicable, their representatives, during its development and its application, to identify and mitigate risks concerning fatigue which could be due to the rostering system itself.

AMC1 ATS.OR.320(a)(6);(7) Air traffic controllers' rostering system(s)

ED Decision 2017/001/R

NIGHT TIME

Night time should be considered as the time between midnight and 05.59.

GM1 ATS.OR.320(a) Air traffic controllers' rostering system(s)

ED Decision 2017/001/R

STRUCTURE AND VALUES OF THE ROSTERING SYSTEM

The selection and the regular revision of an appropriate structure and of appropriate values of the rostering system, in accordance with ATS.OR.320(a) and which fit the intended operations, should be based upon:

- (1) scientific principles;
- (2) data gathered by the air traffic control service provider; and
- (3) best practices.

GM1 ATS.OR.320(b) Air traffic controllers' rostering system(s)

ED Decision 2017/001/R

AIR TRAFFIC CONTROLLERS' INVOLVEMENT

Additional guidance concerning the involvement of air traffic controllers in the definition of rostering systems is available in EUROCONTROL Study on Shiftwork practices — ATM and related Industries, edition 1.0 of 14 April 2006.

Annex 2 – IFATCA policy

Medicine, drugs and Alcohol

MED 9.2.1 EFFECTS OF MEDICINE, DRUGS AND ALCOHOL

IFATCA policy is:

Member Associations should approach their respective administrations to establish guidelines about the effects of the use of medicines, drugs, alcohol and other substances available in their country.

Where possible individual substances including trade names, should be identified and listed in order to give controllers guidance concerning the use of such substances and their compatibility with ATC work.

Controllers should be allocated time off in excess of national standards in recognition of the critical nature of their health in relation to their work.

See: WP 58 - Lyon 1976 and WP 175 - Geneva 2001

An inquiry on the secondary effects of medication with respect to aerial security and the alertness of the controller should be made by the appropriate authorities.

Stress

IFATCA policy is:

Occupational stress is now recognised as an increasingly global phenomenon, affecting all categories of workers, all work places and all countries. Several studies have revealed with scientific integrity that considerable levels of occupational stress reactions have been identified among different groups of air traffic controllers.

Occupational stress is the product of complex interaction of the task, the operational environment and the personality characteristics of the individual. Thus it is difficult to generalise to all controllers groups.

Nevertheless, some of the most common stressors have been identified as:

- a) Demand number of aircraft under control - peak traffic hours - extraneous traffic – unforeseeable events - proficiency checks / examinations;
- b) Operating procedures time pressure - having to bend the rules - feeling of loss of control - fear of consequences of errors;
- c) Working time shift and night work - unbroken duty periods;
- d) Working tools limitations and reliability of equipment - VDT, RTF and telephone quality – equipment layout;
- e) Work environment lighting / optical reflections – noise / distractors - microclimate - bad posture - rest and canteen facilities;

f) Working organization role ambiguity - relations with supervisors and colleagues - lack of trained staff or staff inadequately trained - lack of control over work process - lack of management support - salary - public opinion;

g) Critical Incident / Accident

A critical incident is any situation faced by Air Traffic Controllers that causes them to experience unusually strong emotional reactions which have the potential to interfere with their ability to function either at their positions or later. Critical incident stress (CIS) is the reaction a person or a group has to a critical incident.

(Adapted from Jeffrey Mitchell Ph. D)

IFATCA policy is:

Stress prevention at the work place has proved particularly effective in combating stress, by attacking its roots and causes, rather than merely treating its effects.

The Federation recognises the importance of stress management for air traffic controllers and recommends that, at regular intervals, air traffic controllers be provided with up-to- date information on stress management techniques.

The Federation urges MAs to bring to their administration's attention the stress-inducing potential of their work environment in order that particular consideration is given to ensure that the work environment is suitable and as stress-free as possible.

The Federation endorses the use of professionally trained peers in the provision of critical incident stress management (CISM) to colleagues experiencing critical incident stress (CIS). (Critical incident stress management (CISM) is a wide range of programmes and intervention strategies which have been designed to mitigate the impact of stress in personnel and to assist

them in managing and recovering from significant stress. (Adapted from Jeffrey Mitchell Ph.D.)

Comprehensive and confidential support services should be available at all times for air traffic controllers, support staff and their families.

Professional critical incident stress support services should be made available to air traffic controllers involved in ATC incidents / accidents and any other occurrences that have potential to create critical stress reactions influencing the ATCO's performance. It is the controllers' choice whether or not to take advantage of these support services.

Critical Incident Stress Management

MED 9.2.4 CRITICAL INCIDENT STRESS MANAGEMENT

IFATCA policy is:

Stress prevention at the work place has proved particularly effective in combating stress, by attacking its roots and causes, rather than merely treating its effects. The Federation recognises the importance of stress management for air traffic controllers and recommends that, at regular intervals, air traffic controllers be provided with up-to- date information on stress management techniques.

The Federation urges MAs to bring to their administration's attention the stress-inducing potential of their work environment in order that particular consideration is given to ensure that the work environment is suitable and as stress-free as possible.

The Federation endorses the use of professionally trained peers in the provision of critical incident stress management (CISM) to colleagues experiencing critical incident stress (CIS). (Critical incident stress management (CISM) is a wide range of programmes and intervention strategies which have been designed to mitigate the impact of stress in personnel and to assist them in managing and recovering from significant stress. (Adapted from Jeffrey Mitchell Ph.D.)

[San José 86.C.6-8, amended Taipei 97.C.6].

Comprehensive and confidential support services should be available at all times for air traffic controllers, support staff and their families.

Professional critical incident stress support services should be made available to air traffic controllers involved in ATC incidents / accidents and any other occurrences that have potential to create critical stress reactions influencing the ATCO's performance. It is the controllers' choice whether or not to take advantage of these support services.

Fatigue

MED 9.2.5 FATIGUE IN AIR TRAFFIC CONTROL

ATCO fatigue is defined as follows:

A physiological state of reduced mental or physical performance capability resulting from sleep loss or extended wakefulness, circadian phase, or workload (mental and/or physical activity), affecting the subjective state that can impair an air traffic controller's alertness and ability to perform safety related duties.

See: WP 159 – Bali 2013

IFATCA Policy is:

MAAs should draw the attention of their members to the causes of Fatigue in ATC so that they can identify those to which they are most exposed.

MAAs should advise their members to seek professional psychological advice when they believe that they are subject to excessive stress-inducing agents.

See: WP L004 - Rio de Janeiro 1988

Management has the prime role for providing fatigue management and prevention of fatigue related catastrophes. Any situation where increased fatigue, decreased sleep, or performance loss can be demonstrated, is a situation where the margin for error is reduced, albeit by some unknown amount, and should be avoided in ATC.

The provision of a satisfactory working environment appropriate rostering, rest periods, facilities, use of overtime, relief controllers and education in human factors shall be agreed with the air traffic controllers involved. Attention must be given to individual differences, age and gender.

In exercising the responsibilities of designing of duty rosters (POLSTATs elsewhere refers), management shall be responsible for providing physical arrangements (relief controllers and adapted rest area) and sufficient break periods for controllers to try to maintain their daily eating habits regardless of which shift they are working. Such physical arrangements and sufficient break periods shall be provided to allow for strategic naps during night shifts.

Management shall approve the implementation of strategic naps as an effective way of improving alertness and anchoring the circadian rhythms of controllers during night shift.

A strategic nap is defined as a short period of sleep taken at specific times during a night shift. Recommended duration of a strategic nap varies from maximum 20 minutes for a nap early in the night to maximum 50 minutes late in the night (after 4am).

Management shall in close coordination with the air traffic controllers involved, carefully consider staffing levels during night shifts. For those controllers who have very heavy traffic

loads during the night shifts, additional relief should be considered as an appropriate countermeasure to sleepiness and fatigue in order to increase the safety margins, and to reduce subsequent daytime sleepiness.

Use of overtime shall generally be kept to a minimum, and a system for allocation of overtime which takes the limitations in human performance as a factor shall be established. The combination of overtime shortly before or just after night-shifts shall be avoided.

Control-rooms shall be tobacco-smoke free areas due to the negative effects on dexterity caused by smoking.

MAs should advise their members and management about the causes of fatigue and countermeasures available.

MAs should encourage their management to include theory about the physiological principles related to sleep and circadian rhythms, both in controllers retraining and basic education. Such training should include knowledge of ways to take deliberate actions (countermeasures) to better meet controllers' operational requirements.

See: WP 148 - Toulouse 1998 and WP 159 - Taipei 1997

The Regulator / Legislator should:

- develop comprehensive hours of duty regulations for air traffic controllers, incorporating fatigue management principles;
- require all air traffic service providers to maintain auditable fatigue management systems and establish this as a key element of a target level of safety.

See: WP 162 – Dubrovnik 2009

IFATCA Provisional Policy is:

The FRMS elements model

Tool Control mechanism

Prerequisite 1 Regulation to establish a FRMS

Prerequisite 2 Adequate staffing levels

Prerequisite 3 Awareness of the effects of sleep obtained and promotion of a healthy lifestyle

Prerequisite 4 Environmental and ergonomical provisions regarding working conditions

1. Application of breaks during work time
2. Maximum length of shifts regulation / overtime limitation
3. Appliance of roster model / scheduling
4. Training of the understanding of Prior Sleep and Wake Model (PSWM)
5. Awareness of fatigue and Team Resource Management (TRM)
6. Outcome based fatigue risk management (Fatigue Risk Incident/Fatigue Risk

Errors (FRI/FRE) and fatigue risk trajectory model)

Annex 3 – Reference list

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6. EASA, Easy Access (<https://www.easa.europa.eu/document-library/general-publications/easy-access-rules-air-traffic-managementair-navigation>)

IFATCA 

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