



ANNUAL REPORT 2023



ECA

European Cockpit Association



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INTRODUCTION

A year of standstill and progress by joining forces

One thing is certain in the life of a pilot: it consists of waiting and running. In our daily life we have to wait for an aircraft to refuel, catering and cargo to be loaded, passengers to board and often long waiting periods for permission from air traffic control to depart or arrive. These periods are always alternated with busy phases in which we, as pilots, must initiate all kinds of processes, including flying the aircraft. The year 2023 contained many parallels on a lot of dossiers with this reality and was a year of stagnation and progress.

For passengers and flight crews, the past year, just like 2022, was another year with many delays and cancellations, a lot of waiting and running. A major study of pilot fatigue this summer revealed a very worrying signal. The report shows very significant indicators of pilot fatigue, but also structural shortcomings in the way European airlines manage their fatigue risk. Air carriers under the safety oversight of Ireland, Malta, Spain and the United Kingdom, in particular, clearly perform worse in many of these areas. There is evidently a serious task for national regulators and EASA to address this flight safety risk.



Capt. Otjan De Bruijn
ECA PRESIDENT

Unfortunately, the required approach to social abuses through the revision of Regulation 1008/2008 by the European Commission turned out to be a dossier without any progress. Together with our Member Associations, we have argued for years for legislative changes, based on numerous reports and scientific studies. Unfortunately, the European Commissioner for Transport has chosen to look away from the problems. This process has come to a standstill, but we are continuing full speed in the fight for necessary changes to protect aviation workers from social abuses because another opportunity is on the way with a new European Commission next year.

A major danger to the safety of passengers and crew members are the plans of the aircraft manufacturer Airbus, facilitated by EASA, to introduce single pilot operations during the cruise phase within a few years. We have accelerated our fight against this 'gamble with safety' by entering an intensive collaboration with our fellows from ALPA and IFALPA. Together we started the worldwide campaign named: Safety Starts with 2!

Many challenges are ahead of us and with the support of our Member Associations, pilot experts, representatives & our motivated team in Brussels, we go full speed ahead to advance our pilot profession.

FATIGUE & CHAOS

Unlike last summer, this year EASA took a proactive approach to prepare for the expected air traffic chaos in summer 2023. A Task Force (TF) was convened early on to address potential disruptions and ensure safety. ECA participated in the TF meetings from April to July and provided operational feedback and advocated for proper planning, fatigue management, and caution against operational and commercial pressures.

This led to an **EASA Safety Information Bulletin (SIB)** focusing on air operations and addressing the concerns raised by ECA. However, some air operators disregarded the SIB's recommendations, indicating a lack of oversight by National Aviation Authorities.



But ECA wanted to go a step further than EASA.

We aimed to highlight the risks associated with flying under pressure, uncertainty, and operational chaos. To address these concerns, we developed and shared a series of promotional materials for pilots. These materials include a **Defensive flying checklist** that provides advice on tackling and preventing safety-related issues, **Guidance on mandatory reporting** and the use of the EASA CSR tool and **Fatigue reporting guidelines**.

- **Defensive flying checklist**

Advice to pilots how to tackle and prevent some safety-relevant issues

- **Advice on Reporting**

The ABC of mandatory reporting as well as advice on how to use the EASA CSR tool

- **Fatigue reporting guidelines**

Practical **dos** and **don'ts** when filing a fatigue report. Unfortunately, an increase in fatigue reports within some airlines has triggered an unacceptable response. ECA has received multiple complaints from pilots who faced bullying and retaliation after filing fatigue reports. We are addressing these issues with EASA

The graphic is a vertical blue rectangle with white cloud-like shapes at the top and bottom corners. It features a title 'DEFENSIVE FLYING CHECKLIST' at the top. Below the title is a list of eight items, each preceded by a white diamond icon. The items are: 'TAKE CARE OF YOURSELF AND OF YOUR CREW', 'PLAN FOR DISRUPTIONS', 'OWN THE CLOCK', 'STICK TO STANDARD OPERATING PROCEDURES', 'KEEP CALM & FLY SAFE', 'COMMANDER'S DISCRETION IS A TWO-WAY STREET', 'REPORT YOUR FLIGHT', and 'DEBRIEF THE LESSONS LEARNED'. To the right of the 'OWN THE CLOCK' item is a small icon of a clipboard with a checklist and a red checkmark, next to a small blue airplane icon. At the bottom right of the graphic is the ECA logo, which consists of a white circle containing a stylized white bird in flight, followed by the text 'ECA' and 'European Cockpit Association' below it.

DEFENSIVE FLYING CHECKLIST

- ◇ TAKE CARE OF YOURSELF AND OF YOUR CREW
- ◇ PLAN FOR DISRUPTIONS
- ◇ OWN THE CLOCK 
- ◇ STICK TO STANDARD OPERATING PROCEDURES
- ◇ KEEP CALM & FLY SAFE
- ◇ COMMANDER'S DISCRETION IS A TWO-WAY STREET
- ◇ REPORT YOUR FLIGHT
- ◇ DEBRIEF THE LESSONS LEARNED

 **ECA**
European Cockpit Association

BAINES SIMMONS REPORT ON FATIGUE

During the past summer, we conducted a survey to gauge the levels of fatigue among European pilots. The response was overwhelming, with **nearly 7000 pilots participating**.

The results, analyzed by the independent consultancy Baines Simmons, paint a troubling picture of Fatigue Risk Management in Europe. The survey revealed that pilots experience microsleeps in the cockpit, lack sufficient rest opportunities to prevent cumulative fatigue, and often have to extend their flight duties beyond the legal maximum. These findings come in contrast to the warning issued by the European Aviation Safety Agency (EASA) about the increased risk of aircrew fatigue during the summer. Based on data collected in July, the report shows that fatigue was building up in the cockpits already ahead of the summer peak season...



One noteworthy trend observed in the survey data is that airlines registered in Malta, Spain, Ireland, and the UK consistently scored lower in terms of fatigue management, reporting, rest, and the use of Commander's Discretion. This raises concerns about the practices in these countries and the airlines under their oversight. It is crucial that EASA and national authorities across Europe carefully examine the report and take the necessary actions to ensure effective fatigue reporting systems and proper management of fatigue-related safety risks by airlines.

Regulatory baby steps on FTL

The Baines Simmons report gained significant traction within the pilot community and received media coverage (**eurActiv, Business Insider, Irish Examiner**). It has also been shared with EASA and other aviation stakeholders. The

report's findings were presented at EASA's FTL/FRM FS.TEC meeting in September by Didier Moraine (BeCA) – a leading expert & member of the FTL WG. The findings of the report stirred up a lot of questions from airlines and EASA, and exposed a negative, defensive attitude from many stakeholders.

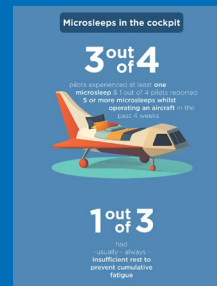
When it comes to EASA, the 'guardian' of FTL rules, there is still a lot of efforts going into following up the FTL Effectiveness Study, which dates back to 2018... Ever since then, the Agency is – albeit slowly – working on soft law changes to address some of the most fatiguing night flights and disruptive schedules. ECA provided numerous **comments to the NPA** published this year and a decision by EASA is expected by the end of 2023.

We are actively working on a range of initiatives to enhance the skills and expertise of pilots on FTLs. As part of this effort, we recently conducted a highly successful **FTL Seminar in Brussels**, training

35 experts from 13 EU countries.

The seminar covered key topics including the historical context of legislation and its impact on current regulations, the importance of general legislation such as social standards and fatigue responsibility, and an in-depth exploration of the structure of EU legislation. Participants also gained valuable insights into reading prescriptive rules and their translation into an IFTSS/Individual Flight Time Specification Scheme, as well as learning about SMS and FRMS paradigms and Biomathematical Modelling.

The aviation industry has been slow to adopt Fatigue Risk Management (FRM), leaving its potential untapped. To address this issue, we held a European version of the **IFALPA FRMS Course in Luxembourg (Dec 2022)**. This course aimed to educate pilots on the scientific aspects of fatigue, develop new experts in FRM, and ultimately promote a stronger safety culture within airlines.





THE SOCIAL CRASH:

EUROPEAN COMMISSION FAILS TO PROPOSE CRUCIAL REVIEW OF AIR SERVICES REGULATION 1008/2008

The European Commission sought James Bond's advice on what to do with the revision of Reg. 1008/2008.

His reply:

“007 here. You came to the right place if you want a license to kill!”

And so, the EU Commission received what it wanted. After nearly a decade of evaluations, consultations & assessments, the EU Commission killed the revision of the Air Services Regulation 1008/2008.

ECA had high hopes for a **revision of 1008/2008**. This review was necessary to clarify the legal definition of «Operational base» and address other important issues such as ownership and control of airline shares, wet-leasing rules, third country carrier operations, and prevention of

(bogus)self-employment in the aviation sector.

Unfortunately, despite support from Members of Parliament and Council members, the European Commission has failed to submit a proposal.

Worse still, there is no chance of it being submitted before the 2024 elections. This not only closes the window of opportunity but also exposes the EU Commission's lack of strategic insight, understanding of social issues in aviation, and political savviness.



In light of this setback, the ECA is now developing a new strategy to address these issues. We are considering all options and scenarios to close legal loopholes and ensure effective enforcement of current legislation.

As we await this new legislation, our focus has shifted to the European Labour Authority (ELA), an organization established in 2021 to address cross-border labour issues. Still in the process of establishing its working methods, ELA has been provided with valuable materials, cases, and reports by ECA, ETF, and ENAA, specifically regarding the aviation industry.

To further understand better the problems in our industry, ELA recently conducted a workshop on aviation (April 2023).

During the workshop, we presented real «on-field» cases that highlighted the problem of bogus self-employment, complex wet-leasing schemes, and the misuse of existing legal loopholes. A key takeaway from the workshop was the lack of knowledge among national liaison officers regarding the current situation in aviation. To address this concern, a meeting is taking place in November 2023. The purpose of this meeting is to map out and discuss enforcement practices and the challenges and opportunities for cross-border cooperation within the aviation field, within the remit of ELA. Social partners, including ECA, will actively participate in this session.

ECA is ready to assist ELA in all possible ways and urges ELA to:

- **Define aviation as a separate workstream of ELA;**
- **Conduct widespread information and publicity campaign about disruption of labour mobility in aviation;**
- **Coordinate national inspections;**
- **Provide trainings and seminars for national labour authorities/inspectors as a part of its capacity building stream;**
- **Conduct analysis of cross border labour mobility issues in the aviation sector.**



WATCH VIDEO



REDUCED CREW OPERATIONS:

TWO, ONE, NONE... REDUCED CREW OPERATIONS EMERGES AS A GLOBAL THREAT

Reduced Crew Operations (**RCO**) is a global threat to aviation safety that cannot be ignored. This issue, originating in Europe, requires our immediate attention and collaborative efforts. Recognizing its impact on pilots worldwide, we have joined forces with ALPA & IFALPA to address this pressing concern.

Our campaign, «**Safety Starts with 2**», launched in March, has gained global attention. Its purpose is to raise awareness within the aviation community and inform decision makers about the dangers associated with RCO.



We firmly believe that maintaining at least two well trained and well rested pilots on the flight deck is crucial for safety. While automation has its place, it cannot fully replace the expertise and skill of seasoned aviators. We will continue to advocate for this cause, opposing RCO at every opportunity.



The campaign began with a press conference in Montreal and the unveiling of a dedicated website and campaign materials. Since its launch, the website has received over **200K visitors**, and we are actively producing new content to reach an even wider audience. Our focus remains steadfast on campaigning, communication, and raising awareness.



In Europe, ECA is undertaking additional initiatives to raise awareness about RCO. We are committed to keeping pilots and the aviation community informed about regulatory and technological developments through short, explanatory videos, dedicated LinkedIn newsletters, and informative articles. Our goal is to ensure that everyone is well-informed about all aspects related to RCO.

Launch Safety Starts with 2 IFALPA Conference Montreal 2023

Furthermore, we are finalizing the selection of a communications agency to help us **effectively communicate the risks of RCO to passengers**. A comprehensive communications campaign is scheduled to launch in early 2024. Our aim is to awaken the aviation industry & our passengers to the safety hazards posed by RCO.



RCO Press Conference

Cooperation with EASA is crucial, and we are actively engaged in providing feedback, information, and input through the stakeholder group focused on eMCO. Our contributions have been documented in the group's final report. As interested stakeholders, we are also providing comments on the Best Intervention Strategy currently under consideration by EASA.

Additionally, we are holding **meetings with manufacturers** to gain a deeper understanding of their perspectives, positions, and the status of relevant technologies. This engagement allows us to have an informed opinion and acquire the necessary knowledge to evaluate their concepts effectively.

We are also open and ready to contribute to any **research or scientific studies** on this subject. Our team is in contact with the research consortium selected by EASA and prepared to provide input when requested.

CAPACITY BUILDING FOR TNA PILOTS

The FTL seminar for pilots working for transnational airlines (TNA) was another successful capacity building initiative in the past year. Held in Brussels on 23 May, it provided a platform to address the specific concerns of TNA pilots regarding FTL. The two main topics of discussion were Commander's Discretion and the use of FTLs as targets rather than limits.

Another recurring topic was the shift from early starts to late finishes, or vice versa. FTL experts actively participated in the seminar, sharing their technical expertise and gathering valuable insights on the practice of controlled rest and the applicability of CLAs across TNAs.

The seminar aims not only to exchange information but also to assist TNA pilots in effectively channeling their energy and coordinating their working methods.



DATA4SAFETY

Having completed the Proof-of-Concept phase, the Data4Safety (D4S) team shifted their focus towards transforming the program from a mere research project into a valuable tool that enhances flight safety.

The program has evolved since its inception in 2016, considering the lessons learned along the way. Initially, a custom platform was built, but now Off-The-Shelf (OTS) tools are leveraged for analysis and data protection. These tools offer more options in less time, backed by state-of-the-art IT systems. D4S incorporated the lessons learned into the requirements for a new service provider during a provider change mandated by EU regulations. The tender document was carefully crafted over a year, taking into account feedback from ECA.

D4S expanded, welcoming new members from National Authorities, operators, and soon Air Traffic Control. The first wave of expansion includes 13 NAAs, 8 operators, and 9 ANSPs. This represents a significant portion of the EU commercial airline fleet, with more to come.



The past year has seen a very active involvement of ECA's experts into EASA workstreams related to UAS, as well as EASA Opinion O3-2023 published at the end of August. We continue to be an influential voice when it comes to Unmanned Aircraft Technology/ UAS.

Of particular relevance to us is the impact on eVTOL (electric Vertical Take-off and Landing aircraft) regulatory proposals, which shape a **framework for type ratings for eVTOL** for commercial airplane and helicopter pilots. Our longstanding collaboration with EASA on these proposals has spanned several years, although certain aspects remain subject to debate. These proposals are expected to serve as the initial regulatory framework for certified operation of eVTOL under EASA.

Five measures to counter rogue drones in the vicinity of airports

[Learn more →](#)

- **Stricter** regulations
- **Public awareness** campaigns
- Better drone **technology**
- **Standardized** reporting procedures
- Classification as a **serious incident**

Public awareness campaigns

Educate the public about the risks of **flying drones near airports** through public awareness campaigns

Standardized reporting procedures

Sightings of drones near airports should be **reported** through standardized procedures involving **ATC, airport authorities, local police, and flight crews**

Countering drones

NEW ILO REPORT

ECA was proud to join the IFALPA/ITF delegation at the «Technical meeting on a green, sustainable and inclusive economic recovery for the civil aviation sector» held by the ILO in Geneva from 24-28 April. Behind this cryptic and high-level title, hides a significant forum, where employers, employees, and governments came together to determine the guiding principles for respecting the fundamental rights of aviation personnel.

Together, we discussed the crucial topic of achieving a sustainable recovery for the aviation industry. The report acknowledges the challenges that ECA has been raising awareness of over the past years and provides strong recommendations to governments and the ILO on how to address them.



Link to the ILO report

- **Strong focus on atypical work and how it affects fair competition**
- **Emphasis on the responsibility of stakeholders to respect human and labour rights in supply chains of the aviation industry**
- **Recommendation to enforce the collaboration with ICAO, echoing a similar recommendation from the European Labour Authority earlier this year**



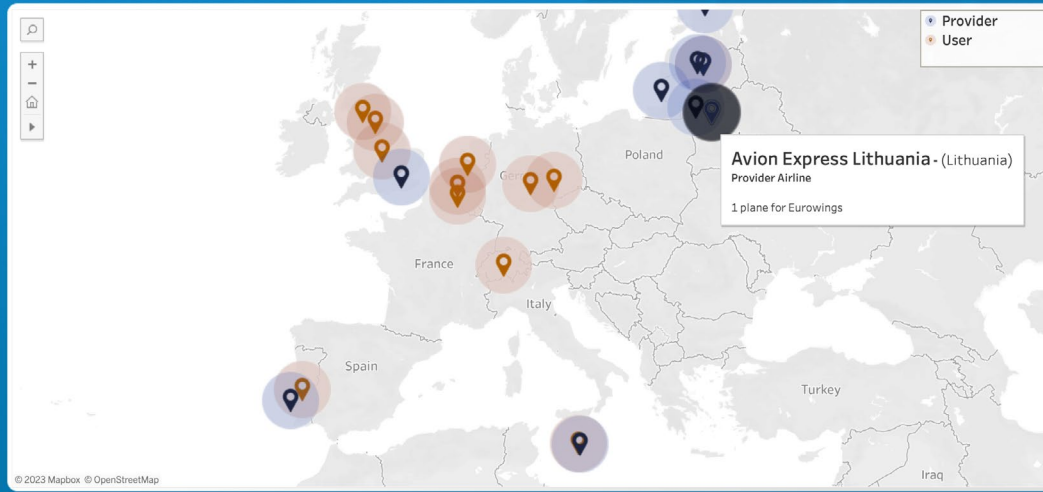
WET-LEASE: LEGAL OR NOT, THAT'S NOT THE QUESTION

Wet-leasing, while legal, has unfortunately become a means for some airlines to exploit social and labor loopholes. These practices, carried out through wet-lease arrangements, allow airlines to circumvent employment regulations by using self-employed crew or intermediaries, who are not registered in the EU. This abuse has prompted ECA to run an awareness-raising campaign for a second year in a row.

Our goal is to expose the issues associated with wet-leasing, offer guidance to pilots involved in such arrangements, raise awareness among authorities, and submit evidence of abuse to national authorities and the European Labour Authority. Raising awareness among user airlines about their responsibility in the subcontracting chain is another important objective.

To aid in this effort, we have developed an interactive dashboard that maps potentially suspicious wet-lease cases. Through this **dashboard**, we can analyze the different providers and user airlines, the number of flights, and uncover patterns. It becomes clear that wet-lease providers are primarily concentrated in certain parts and countries of Europe, while users are predominantly located in the western region. This increase in the number of providers and users raises concerns, particularly due to the lack of transparency in employment relationships, which goes against the provisions outlined in the Directive on transparent and predictable working conditions.

Additionally, we dedicated a **special webpage** to raise awareness of the issue and we provided targeted information on the rights of the crew. Typically, aircrew on wet-lease contracts are not designated as posted workers and are not provided with A1 certificates.



Press release: European Pilots' investigation uncovers troubling labor law violations in wet-leased aircraft operations

Last but not least, we submitted our **findings to the national labour and aviation authorities** and the European Labour Authority in Bratislava for a comprehensive inquiry.

PILOTS FOR SUSTAINABILITY

The Environmental working group meeting is one of our well-attended sessions, and it's no surprise given that environmental sustainability is a crucial topic for the entire aviation industry. All stakeholders share concerns about the environmental impact of aviation and actively seek initiatives to contribute towards a greener future.

At **ECA**, we ensure our experts have access to relevant information, scientific studies, and engage with other stakeholders. This helps us make informed decisions when shaping our policies. We take pride in collaborating with a knowledgeable team of experts who provide valuable insights.

Over the past year, we have advocated for important changes, including increased sub-targets for e-kerosene and a clear distinction between economic and safety considerations. These recommendations were successfully adopted in the ReFuelEU Aviation compromise text.

Additionally, we have worked on a **new position paper** that focuses on contrails. Recognising the importance of addressing non-CO2 emissions in aviation decarbonization efforts, ECA has produced this paper and calls for a careful approach. The paper was launched in October and received positive feedback from industry stakeholders as a timely and relevant initiative.



ENVIRONMENT WORKING GROUP



GETTING A GRIP ON IN-FLIGHT SECURITY

We continue our work on advocating for in-flight security rules (populating Chapter 10) within the framework of the Regulation 2015/1998 recast. Based on numerous ECA interventions at the SAGAS platform, as well as bilateral exchanges with the regulator and different stakeholders, we have indications that the European Commission could develop new guidance material on in-flight security.

SHAPING MORE CYBERSECURE EU AVIATION

During the past year, ECA successfully commented on NPA 2023-102, which resulted into the adoption of AMC and GM to complement Regulation 2022/1645 and Regulation 2023/203. Our comments mainly addressed issues with regards to GPS spoofing, data integrity, supply chain attacks, information confidentiality, ISMS/Information Security Management System exemptions.

POSITIVE ORGANISATIONAL SAFETY CULTURE

In April 2023, we released a new paper: “**Positive Organisational Culture in Aviation**”. This thought-provoking document delves into the challenges faced by the aviation industry, magnified by the pandemic, and advocates for a holistic approach to organisational culture.

By fostering a psychologically safe workplace, this concept of Positive Organisational Culture in Aviation aims to cultivate safety-conscious behavior. The benefits extend beyond safety alone, positively impacting the economic aspects of the airline as well.

The paper outlines key attributes of a positive organisational culture, including a psychologically safe environment, integration of Just Culture principles, credible values, ethical leadership, and transparent employment relationships.

Attributes of Positive Organisational Culture in Aviation

ECA proposes the following as essential attributes and cornerstones of this Positive Organisational Culture that balances an organisation's economic realities, staff motivation and well-being, as well as high safety standards:

- a psychologically safe environment
- integration of Just Culture attributes
- credible values
- leadership
- a transparent and balanced employment relationship.

Effective and successful implementation of a Positive Organisational Culture in Aviation that organisations should also incorporate aspects of the attributes found in high performing organisations, leading organisational and similar concepts, in addition to the basic attributes mentioned above.

The need for a 'psychologically safe' environment

Psychological safety can be defined as: **‘feeling able to show and employ one's self without fear of negative consequences of self-image, status or career’**

It is a **‘shared belief that the team is safe for interpersonal risk taking, in psychologically safe teams, team members feel accepted and respected’**.

In such a psychologically safe environment, team members are encouraged to speak, share concerns, questions or ideas – and this without fear for negative consequences.

In such an environment, organisations are able to innovate and thrive, become and stay both efficient and resilient.

Hence, any organisation that relies on safety-conscious employees, needs to foster innovation, or rely heavily on the motivation of their employees, needs to create a psychologically safe environment at its core.

The employment contract is the first and most basic foundation of the relationship between the staff/employee and the organisation. Hence works for:

It is the relationship results in a one-sided approach - where most or all the benefits accrue to the employee while the organisation enjoys the side effect of even the most basic social commitments - then the organisation will hardly be able to generate either motivation (based through fear) or psychological safety.

One can also think of this to create an environment where all staff will feel confident to balance their decisions and actions according to safety principles. Transparent and well-structured employment conditions as related to the basic contract form - are an absolute requirement. Direct, open-ended employment contracts therefore form the very basis for developing and strengthening a **Positive Organisational Culture** as well as organisational resilience.



Conclusion

The industry has emerged from the Covid pandemic, weakened and many problems and challenges that were underlying have become visible, as demonstrated by the industry's losses and facing a wave of closures. In order to guarantee the industry's survival and resilience, the economic and environmental challenges that our industry will face over the coming years will only be resolved if this industry:

From a safety point of view, ECA believes that the aviation industry needs to build on and evolve from the current 'Just Culture' concept and move towards being safety culture and controlled, cooperative culture as strongly interdependent. You cannot have one without the other.

ECA is convinced that Positive Organisational Culture in Aviation will enable organisations to become not only resilient in a safety context but also in a wider economic context, as well as increasing their financial, social and environmental sustainability in the long term.

As a key **forward**, industry stakeholders, including regulators, are invited to cooperate in the development of operational, Positive Organisational Culture in Aviation to derive better and implement best practices for all stakeholders in the aviation value chain.



Download

OUR EXPERTS AWARDED IFALPA SCROLLS OF MERIT

During the IFALPA Conference, three esteemed European pilot experts were honored with IFALPA Scrolls of Merit.



CPT PETER BEER

... boasts an impressive aviation career spanning over 40 years, excelling not only as a pilot but also as a Typing Instructor, Typing Examiner, and Head of Training. Peter's contributions include the establishment of Crew Resource Management Courses.



CPT EVAN CULLEN

... who has served as president of IALPA for the past two decades, has played a vital role in enhancing the conditions and representation of pilots throughout Europe. His unwavering dedication has made a significant impact.

CPT TANJA HARTER



... a captain with exceptional flying skills and professional expertise, has demonstrated her unwavering commitment to the pilot community at both national and international levels. With her active involvement as a responsible Working Group Chair at VC, ECA, and IFALPA, Captain Tanja Harter sets a remarkable example for aspiring women pilot leaders.

THE BRUSSELS TEAM IS MOVING!

In addition, after 12 years at our current location on rue du commerce 20-22, the ECA office will be relocating. Our objective is to provide our team and experts with greater comfort and better-equipped facilities while maintaining a familiar environment. We look forward to welcoming you to our new offices in the spring of 2024!



The European Cockpit Association (ECA) was created in 1991 and is the representative body of European pilots at EU level. We represent over 40,000 European pilots from 36 national pilots' associations.



ECA

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