

Ghent, 26<sup>th</sup> October 2012

## Letter concerning EASA Opinion 04/2012

To whom it may concern,

The European Passengers' Federation has been following with great interest the development of a set of standards by EASA concerning rules on Flight and Duty Time Limitations and rest requirements for commercial air transport (EASA Opinion 04/2012). Our interest in these matters is the safety of the passengers.

From a passengers' point of view safety standards should be based on stated and clear objectives and where possible, based on scientific evidence. If any doubts remain the precautionary principle should be applied at any time when it comes to safety of the millions of air passengers. The European Passengers' Federation would like to express its concern on whether EASA has been following these principles.

We would like to formulate the following concerns which EPF has with the new rules on Flight Time Limitations :

- Why does EASA propose to put an end to the rights of the Members States to implement safety standards that are higher than the level set by EASA? Lower safety standards on some aspects in the different Members States are foreseeable if these proposed rules are adopted. EPF and the European passengers would like to have a clear overview which safety rules would progress or regress with regard to the current situation in the different EU Members States.
- Under the new rules, pilots that have been awake for 22-23 hours can land an aeroplane carrying passengers. Passengers would expect this provision to be based on robust scientific evidence. What is this evidence, by which eminent authorities is it endorsed and what is the balance of authoritative scientific thinking concerning its acceptability and the certainty of a pilot being alert and awake in these circumstances?

- The impact assessment related to the EASA opinion gives little information on clear objectives concerning the passengers' safety. The impact assessment states that safety of the travelling public will be improved. As a passenger organisation we do ask the question how this can be the case for those Member States which currently maintain stricter rules and which as a result of an eventual new regulation are obliged to lower their limits?
- Our last concern is that the process and documents provided are also not sufficiently transparent for stakeholders to understand whether the measures provide the desired level of safety for the passengers.

The European Passengers' Federation would kindly like to ask EASA and the European Commission whether they can provide us the answers to the above questions in order to reassure the European passengers.

The European Passengers' Federation would like to appeal to EASA, the EU Commission, Transport Ministers and the EU Parliamentarians to make passengers safety paramount in the discussions on the adoption of these new rules.



Trevor Garrod  
Chairman EPF  
[chairman@epf.eu](mailto:chairman@epf.eu)