

MACCARES MACAO CONFIDENTIAL AVIATION REPORTING SYSTEM

MACCARES BULLETIN

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MACCARES bulletin is published by the Accident Prevention and Investigation Group (APIG) by using the de-identified information collected from MACCARES. It serves as a platform for sharing aviation safety information in the community.

Below are some of the reports extracted from MACCARES database:

1. Insufficient rest time for pilot after operating flight at Late Night Period (LNP)

The reporter expressed a safety concern regarding lack of rest time after operating at late night period (LNP). According to the reporter, the late night flight was scheduled to depart from Macau around midnight, so pilots should take enough time to rest (normally 8-9 hours) before midnight. After operating the flight, the arriving time at destination was in the morning, while the next duty for the pilots was another flight back to Macau which scheduled in the next day early morning, so that means the pilots had around 22 hours for rest. The reporter mentioned that if the pilots took rest immediately after arriving destination then it was not possible to sleep at night again before next day early morning flight since the circadian rhythm of the pilots was being disrupted, so that made the pilots felt tired when operating the flight back to Macau.

The reporter also mentioned that the next duty after come back to Macau will be very often another next day morning flight so that repeating the similar issue which resulting the pilots exhaust and feel extremely tired.

The reporter suggested a mandatory minimum 2 days off after operating at LNP in order to provide enough rest time for pilots to adjust their circadian rhythm.

According to the *Air Navigation Regulation of Macao* paragraph 51 to 54 approved by the Executive Order 64/2019 clearly address Fatigue of Crew. Flight time and duty time of flight crew is governed by Aeronautical Circular AC/OPS/013R00 *Avoidance of Fatigue in Aircrew*. Provisions for flight duty falls within the late night period are prescribed in paragraph 14 of the attachment of this Aeronautical Circular.

The situation mentioned in this MACCARES report where the rest period provided for the flight crews before and after the LNP duty were in compliance with the FTL requirements based on the AACM surveillance results. However, in order to enhance the safety of flight, the AACM reminds operators always follow the provisions required by Aeronautical Circular AC/OPS/013R00 especially for flight duty falls within the late night period.



The compliance with the FTL Scheme will be continuing monitored during surveillance audits with attention to the oversight of late finishes/early starts.

2. Safety and reporting culture

This report expressed the safety issue related to maintenance practice and reporting culture. According to the evidences provided by the reporter, 2 occurrences were reported on the company internal safety reporting system but reporter concerned those should also be reported via MOR to AACM. The reporter mentioned that reluctant to report was a norm in the company since it was inconvenience and could create additional work for managers. The reporter also mentioned there was another occurrence caused by time pressure and non-standard maintenance practice, but at the end there was no report on such occurrence.

The reporter stated that the reason for staffs not following safety reporting system was due to poor safety culture and the punitive (non-documented) culture. And such circumstance was not only in maintenance department but also in flight operation department.

Paragraph 88 of the *Air Navigation Regulation of Macao* approved by the Executive Order 64/2019 specifies the provision about mandatory reporting. The mandatory reporting system is governed by Aeronautical Circular AC/GEN/003R02 *Mandatory Occurrence Reporting Scheme*.

Any Macao registered aircraft, aircraft operating under the jurisdiction of Macao or organisations providing service of facility for aircraft operation in Macao should comply with the MOR scheme and make report to AACM if observe reportable occurrence (the definition of reportable occurrence clearly state in the ANRM paragraph 88 and AC/GEN/003R02 paragraph 2.2). the overall objective of the MOR scheme is to improve the flight safety and not to attribute blame. APIG suggests operators to take appropriated actions to improve the internal safety and reporting culture and clearly state the objective of the reporting scheme either internal or external.

The related AACM department had conducted unannounced audits on occurrence reporting, operators being identified with missing report of MOR were required to take immediately corrective actions and provided preventive action plan. The compliance of the MOR Scheme will be continuing monitored during routine surveillance audits.

3. Non-authorized personnel accessed to the flight deck during flight

The reporter expressed a safety concern regarding non-authorized personnel entering the flight deck during flight. According to the evidence provided by the reporter, it shown non-authorized personnel (kids) had accessed to the flight deck while the aircraft was in operation.

The reporter pointed out that was a serious safety issue and suggested to take appropriate action to prevent such circumstance happen again.

Non-authorized personnel in the flight deck during aircraft operation could interfere with the flight crews and also the instruments could easily be touched due to limited area of the flight deck resulting in serious consequence.

AACM had sent letter to the operator urging them to remind pilots to ensure flight deck safety and security and strictly follow their operations manual and security manual in which the policy for admission to cockpit has been established in order to ensure that non-authorized persons are prevented from entering the flight deck during flight.

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