

GACA Regulatory Exemption No. 2020-8-1AP-117

In the matter of the petition of Saudi Arabian Airlines, referred to hereinafter as "Saudia" (AOC- SVAAC001, petition ref-42/211/02/11901130 dated 24 August 2020) to be exempted from certain GACA regulations pertaining to Flight and Cabin Crew duty time and limitations in order to enable Saudia to resume long haul commercial operations under the worldwide COVID-19 restrictions, based on the Saudi Arabian Civil Aviation Law (Royal Decree No. M/44) and the delegation of responsibilities to the President of GACA for the administration of regulatory policy in the sector of civil aviation, and after considering GACA's Assessment Report 2020-8-1AP-117, the President is, hereby, granting this exemption to Saudia with the conditions and limitations hereinafter.

1 Applicability.

- 1.1 Based on Saudia's (SVAAC001) request letter number 42/211/02/11901130 dated 24 August 2020 to be exempted from GACAR 117.11 (a)(3), 117.17(a) through (d) and 121.1041(a); and Saudia's request letter number 42/4952/01/11901130 dated 07OCT20 to extend exemption number 2020-8-1-117, this exemption is issued and shall be applicable for Passenger Aircraft Only and the following types:
 - 1.1.1 B777-300.
 - 1.1.2 B787.
- 1.2 Saudia shall ensure implementation of the mitigation measures listed in their provided Safety Risk Assessment 20200825-FDPUL-FLT, 20200825-FDPPX-FLT, and all conditions listed hereafter.

2 Flight Time Limitations.

- 2.1 Flights with four (4) Flight Crewmembers: Are not allowed under this exemption.
- 2.2 Flights with six (6) Flight Crewmembers: The maximum Flight Time Limitation is twenty-eight (28) hours.
- 2.3 Flights with eight (8) Flight Crewmembers: The maximum Flight Time Limitation is thirty-four (34) hours.

3 Flight Duty Period Limitations.

- 3.1 When on-ground rest is utilized, in contingencies only, the following Flight Duty Period Limitations shall be increased by six (6) hours.
- 3.2 Flights with four (4) Flight Crewmembers are not allowed under this exemption.
- 3.3 Flights with six (6) Flight Crewmembers: The maximum Flight Duty Period is thirty-five (35) hours.
- 3.4 Flights with eight (8) Flight Crewmembers: The maximum Flight Duty Period is forty (40) hours.

4 Flight Duty Period Extension.

- 4.1 Extension under GACAR 117.19 (a) is not allowed under this exemption.

5 Reserve Status.

- 5.1 Reserve Flight Crewmember for flights under this exemption shall be provided with at least twenty-four (24) hours pre-flight Rest.
- 5.2 The total number of hours a Flight Crewmember may spend in a Flight Duty Period and a Reserve Availability Period may not exceed the Flight Duty Periods limits as specified in paragraph [3. Flight Duty Period Limitations] plus four (4) hours.

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6 Rest Periods.

6.1 Pre-Flight:

- 6.1.1 Pre-Flight Rest shall be at least twenty-four (24) hours at home base.
- 6.1.2 All Flight Crewmembers shall be provided with at least fourteen (14) hour rest when they are planned for layover in the kingdom of Saudi Arabia.

6.2 Post-Flight:

- 6.2.1 Post-Flight Rest shall be at least fifty-six (56) hours at home base.
- 6.2.2 Flight Crewmembers will be planned for layover at destination in the Kingdom of Saudi Arabia if the flight terminates at other than the crewmembers' home base.

7 Cabin Crewmembers.

7.1 Cabin Crew Member complement:

- 7.1.1 One (1) augmented crew complement shall be assigned to each sector with passenger load.
- 7.1.2 For sectors with no passenger load the following shall be assigned:
 - 1) Four (4) Cabin Crewmembers are required when the duty period exceeds thirty-five (35) hours.
 - 2) Three (3) Cabin Crewmembers are required when the duty period is thirty-five (35) hours or less.

7.2 Duty period for all Cabin Crewmembers shall be limited to 40 hours.

7.3 Pre-flight rest shall be at least twenty-four (24) hours including reserve Cabin Crewmembers Post-flight rest shall be at least forty-eight (48) hours.

8 Additional Conditions and Limitations.

- 8.1 Flight Crewmember's age shall be limited to sixty (60) years (Gregorian).
- 8.2 Crew should receive notification of duty as early as possible so they can plan for optimal rest.
- 8.3 On-Ground Rest period using the in-flight rest facility on board (when utilized) is restricted to the following:
 - 8.3.1 Crewmembers shall be provided with at least 6 hours of uninterrupted sleep opportunity.
 - 8.3.2 Aircraft shall be provided with means of electrical supply and temperature control.
 - 8.3.3 No loading or servicing of the aircraft will take place during the on-ground rest period.
 - 8.3.4 Is not required to be planned as a part of the pairing.
- 8.4 In-Flight Rest period:
 - 8.4.1 Priority should be given to aircrafts with Class 1 rest facilities.
 - 8.4.2 In Passenger aircraft, the front zone; twelve (12) seats shall be used for crew rest.
- 8.5 This exemption is limited to two (2) sectors except for emergency, technical, or weather diversions.
- 8.6 Saudia shall not schedule any Flight Crew Member for more than two (2) duty allocations per calendar month under operations utilizing this exemption.
- 8.7 This exemption is limited to augmented crew operations.
- 8.8 No exemption is granted from GACAR §117.23 "Cumulative Limitations".
- 8.9 Crewmembers must be acclimatized to home base.
- 8.10 Risk Assessment.

- 8.10.1 Saudia shall identify and implement other mitigations following its Operation Specific Risk

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Assessment.

- 8.10.2 Saudia shall carry out enhanced monitoring and analysis of Flight Data Monitoring, Aviation Safety Reports / Mandatory Occurrence Reports, and crew fatigue reports generated during exempted operations to have a better understanding of the impact on crew fatigue. Actions will be taken to address any issues identified by this exercise without delay.
- 8.11 Reports: A weekly briefing, for operation conducted under this exemption, shall be provided by Saudia Director of Flight Operations and Director of Safety to GACA [meeting minutes will be taken by GACA S&RM] covering, but not limited to, the following:
- 8.11.1 Airports Return to Normal Operations' (RNO) updates and development of conditions.
- 8.11.2 Evidences of:
- 1) Actions taken with MOH and updates of MOH protocols,
 - 2) Actions taken to mitigate exemption related fatigue risk(s),
 - 3) Actions taken to mitigate risks as a result of Flight Data Analysis events,
 - 4) Actions taken to mitigate risks reported through Aviation Safety Reports, Mandatory Occurrence Reports, Confidential Reports, Anonymous Reports, Crew Fatigue Reports, GACA and SV Fatigue Risk surveys and FCM safety concerns,
 - 5) Actions taken to encourage Flight Crewmembers to report hazards, with emphasis on fatigue,
 - 6) Actions taken to promote Just Culture concept,
 - 7) Actions taken to raise the awareness about fatigue risk management.
- 8.12 Saudia shall be subject to an enhanced oversight of the granted exemption.
- 8.13 GACA will closely monitor the development of conditions justifying the need for exemptions and will rescind this exemption as these conditions cease to prevail.
- 8.14 In case of crew layover due to circumstances beyond control, upon return to home base, the crew will comply with the current established protocols as determined by MOH.

9 Validity.

This exemption is valid until December 31st, 2020 provided all requirements in this exemption are complied with.

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Abdulhadi bin Ahmed Al-Mansouri
President of General Authority of Civil Aviation

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In the matter of the petition of Saudi Arabian Airlines (GACA SVAAC001) for an exemption from the requirement of GACARs 117.11 (a)(3), and 117.17(a) through (d); to allow Commercial Air Transport Operations under the worldwide COVID-19 restrictions, this report provides the required regulatory and technical assessment of the subject petition while providing the required safety risk assessment and appropriate mitigation measures.

Purpose:

By Petition for Regulatory Exemption Application (GACA Form 1001) dated 24 August 2020 along with its attachments, Saudi Arabian Airlines petitioned the General Authority of Civil Aviation (GACA) for exemption from the requirement of the following GACA regulations:

§ 117.11 Flight Time Limitation.

- (a) *No certificate holder may schedule and no flight crew member may accept an assignment or continue an assigned flight duty period if the total flight time:*
- (3) *Will exceed 17 hours if the operation is conducted with a 4-pilot flight crew.*

§ 117.17 Flight Duty Period: Augmented Flight Crew.

- (a) *For flight operations conducted with an acclimated augmented flight crew, no certificate holder may assign and no flight crew member may accept an assignment if the scheduled flight duty period will exceed the limits specified in Table C of this part.*
- (b) *If the flight crew member is not acclimated:*
- (1) *The maximum flight duty period in Table C of this part is reduced by 30 minutes.*
- (2) *The applicable flight duty period is based on the local time at the theater in which the flight crew member was last acclimated.*
- (c) *No certificate holder may assign and no flight crew member may accept an assignment under this section unless during the flight duty period:*
- (1) *Two consecutive hours in the second half of the flight duty period are available for in-flight rest for the pilot flying the aircraft during landing.*
- (2) *Ninety consecutive minutes are available for in-flight rest for the pilot performing monitoring duties during landing.*
- (d) *No certificate holder may assign and no flight crew member may accept an assignment involving more than three flight segments under this section.*

§ 121.1041 Cabin Crew Member Duty Period Limitations and Rest Requirements.

- (a) *Except as provided in paragraph (b) of this section, a certificate holder may assign a duty period to a cabin crew member only when the applicable duty period limitations and rest requirements of this paragraph are met.*
- (1) *Except as provided in paragraphs (a)(4) through (6) of this section, no certificate holder may assign a cabin crew member to a scheduled duty period of more than 14 hours.*
- (2) *Except as provided in paragraph (a)(3) of this section, a cabin crew member scheduled to a duty period of 14 hours or less as provided under paragraph (a)(1) of this section must be given*

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- a scheduled rest period of at least 9 consecutive hours. This rest period must occur between the completion of the scheduled duty period and the commencement of the subsequent duty period.
- (3) The rest period required under paragraph (a)(2) of this section may be scheduled or reduced to 8 consecutive hours if the cabin crew member is provided a subsequent rest period of at least 10 consecutive hours; this subsequent rest period must be scheduled to begin no later than 24 hours after the beginning of the reduced rest period and must occur between the completion of the scheduled duty period and the commencement of the subsequent duty period.
- (4) A certificate holder may assign a cabin crew member to a scheduled duty period of more than 14 hours, but no more than 16 hours, if the certificate holder has assigned to the flight or flights in that duty period at least one cabin crew member in addition to the minimum cabin crew member complement required for the flight or flights in that duty period under the certificate holder's operations specifications.
- (5) A certificate holder may assign a cabin crew member to a scheduled duty period of more than 16 hours, but no more than 18 hours, if the certificate holder has assigned to the flight or flights in that duty period at least two cabin crew members in addition to the minimum cabin crew member complement required for the flight or flights in that duty period under the certificate holder's operations specifications.
- (6) A certificate holder may assign a cabin crew member to a scheduled duty period of more than 18 hours, but no more than 20 hours, if the scheduled duty period includes one or more flights that land or take off outside the Kingdom of Saudi Arabia, and if the certificate holder has assigned to the flight or flights in that duty period at least three cabin crew members in addition to the minimum cabin crew member complement required for the flight or flights in that duty period under the certificate holder's operations specifications.
- (7) Except as provided in paragraph (a)(8) of this section, a cabin crew member scheduled to a duty period of more than 14 hours but no more than 20 hours, as provided in paragraphs (a)(4) through (6) of this section, must be given a scheduled rest period of at least 12 consecutive hours. This rest period must occur between the completion of the scheduled duty period and the commencement of the subsequent duty period.
- (8) The rest period required under paragraph (a)(7) of this section may be scheduled or reduced to 10 consecutive hours if the cabin crew member is provided a subsequent rest period of at least 14 consecutive hours; this subsequent rest period must be scheduled to begin no later than 24 hours after the beginning of the reduced rest period and must occur between the completion of the scheduled duty period and the commencement of the subsequent duty period.
- (9) Notwithstanding paragraphs (a)(4) through (6) of this section, if a certificate holder elects to reduce the rest period to 10 hours as authorized by paragraph (a)(8) of this section, the certificate holder may not schedule a cabin crew member for a duty period of more than 14 hours during the 24 hour period commencing after the beginning of the reduced rest period.
- (10) No certificate holder may assign a cabin crew member any duty period with the certificate holder unless the cabin crew member has had at least the minimum rest required under this section.
- (11) No certificate holder may assign a cabin crew member to perform any duty with the certificate holder during any required rest period.
- (12) Time spent in transportation, not local in character, that a certificate holder's operations require of a cabin crew member and which transports him to an aerodrome at which he is to

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serve on a flight as a crew member, or from an aerodrome at which he was relieved from duty to return to the cabin crew member's home station, is not considered part of a rest period.

- (13) *Each certificate holder must relieve each cabin crew member from all duty for at least 24 consecutive hours during any 7 consecutive days.*
- (14) *A cabin crew member is not considered to be scheduled for duty in excess of duty period limitations if the flights to which the cabin crew member is assigned are scheduled and normally terminate within the limitations, but which due to circumstances beyond the control of the certificate holder (such as adverse weather conditions) are not at the time of departure expected to reach their destination within the scheduled time.*
- (15) *The time spent by any crew member conducting passenger boarding or deplaning duties in accordance with GACAR § 121.757 is considered duty time.]*

The petitioner supports its request with the following information/ documents:

- VP flight operations (Saudia) request letter number 42/211/02/11901130 dated 24 August 2020.
- Petition form (GACA 1001) dated 24 August 2020.
- Saudia's request letter number 42/4952/01/11901130 dated 07OCT20 to extend exemption number 2020-8-1-117 [Attached].
- Risk Assessments prepared by Saudia Safety, Aviation Security, and Quality department:
 - o 20200825-FDPUL-FLT dated 25 August 2020.
 - o 20200825-FDPPX-FLT dated 25 August 2020.

The GACA's analysis:

As a result of the petitioner's request, the following actions took place:


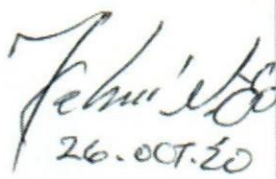

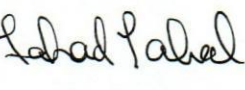
1. A meeting was held with the petitioner's DFO, DOS and Chief Pilot.
2. GACARs 117.11(a)(3), and 117.17(a) through (d); were reviewed.
3. GACAR 121.1041(a) was added to the petitioner requested exemption due to its connection to the requested operations.
4. GACAR 117.29 was omitted from the review due to its inapplicability to the petitioner request.
5. Safety Risk Assessment (SRA) provided by the petitioner was shared with GACA safety department for review.
6. GACA Safety and risk mitigation department had accepted the methodology of the petitioner's SRA, and GACA Aviation Standards department reviewed, assessed and accepted the technical aspects of the SRA.
7. The following GACARs were found affected by the exempted operations:

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#	GACAR Ref	Remarks	Exemption Ref
a.	117.1	Applicability is limited to B777 and B787.	1.1
b.	117.11(c)	10 days requirement was reduced to 7 days (weekly report)	8.11
c.	117.11(d)	Requirement changed to immediate action	8.10.2
d.	117.19(a)	FDP Extension is not authorized	4.1
e.	117.19(b)(1)	Table reference changed to text reference	3
f.	117.19(b)(2)	Exemption post-flight rest covers the requirement	6.2
g.	117.19(b)(4)	10 days requirement was reduced to 7 days (weekly report)	8.11
h.	117.21(c)(4)	New reserve availability period	5.2
i.	117.25(e)(f)(g)	New rest period requirement	6

In light of the above actions, the GACA Aviation Standards concluded that an Acceptable Level of Safety to GACARs 117.11(a)(3), 117.17(a) through (d), and GACAR 121.1041(a) will be achieved by the adoption of the mitigation measures of the attached Exemption. Thus, an exemption may be granted, on a temporary basis and as applicable or necessary, to allow the Commercial Air Transport Operations during the COVID-19 pandemic outbreak.

Signed by :

Capt. Saeed AlHumrani GM of Flight Operation	Dr. Ahmad Alzuhairi GM of Safety & Risk Management	Mr. Hatim Murad Manager of Legislations	Capt. Fahad AlThaqafi POI of Saudia
	 26. OCT. 20	 26 OCT 2020	

Dated 25 October 2020.