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## **Position Paper**

### **Fatigue: a systemic risk to Cabin Crew health and flight safety**

Fatigue represents one of the most significant occupational hazards in civil aviation today. For cabin crew in particular, it affects not only our health and wellbeing, but also our ability to carry out safety and security procedures effectively with a direct threat to the safety of flight operations. Cabin crew members are responsible for critical safety and emergency procedures that require alertness, decision-making, and quick response, fatigue must be understood as both a safety and a public health issue.

Scientific studies and aviation safety investigations have repeatedly shown that fatigue impairs cognitive function, reduces attention and reaction time, and increases the likelihood of errors. In the aviation context, these errors can have catastrophic consequences. Fatigue can lead to:

- Missed safety checks or emergency equipment inspections;
- Slower reaction to in-flight incidents such as fire, decompression, or medical emergencies;
- Impaired ability to manage conflict or security threats on board;
- Diminished communication and coordination with the cockpit crew, especially during critical phases like take-off and landing.

Fatigue-induced lapses not only endanger passengers and crew but can compromise evacuation procedures, emergency responses, and overall situational awareness.

Cabin crew do not have the ability to "pull over and rest." They operate in confined environments, across irregular schedules and time zones, under physical and mental pressure. When proper rest is not provided or when flight schedules are excessive, fatigue becomes not just probable but inevitable—placing aviation safety in jeopardy.

Cabin crew work under highly specific conditions, distinct from many other sectors. These include night duties, irregular schedules, extended duty periods, multiple time-zone crossings, disrupted circadian rhythms and workloads. All of these are scientifically proven to contribute to cumulative fatigue.

Numerous scientific studies have established the detrimental impact of fatigue on cabin crew performance and degrades cognitive functions, slows reaction times, and impairs decision-making.



## Legal framework: Regulation (EU) 2018/1139 and its implementation

Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 provides the foundational legal framework for air operations in the European Union. Annex V of this regulation outlines the essential requirements for crew members, emphasizing the prohibition of duty when fatigued and mandating that rest periods be sufficient to overcome fatigue from previous duties.

**Article 7.5** of Annex V specifically prohibits any crew member from allowing fatigue to impair safety, taking into account cumulative fatigue, sleep deprivation, and night duties.

**Article 7.6** further states that no crew member may operate while unfit due to fatigue or related conditions.

**Article 8.7** requires the implementation of fatigue management systems, which must consider flight and duty time limitations, rest requirements, and physiological factors such as circadian rhythm disruption.

## Challenges in current regulation and practice

While EASA requires airlines to implement Fatigue Risk Management Systems (FRMS), many fatigue-related provisions remain non-binding or inadequately monitored such as:

- **Delayed roster publication**, which prevents crew members from planning adequate rest.
- **Inadequate rest periods** between duties, especially after extended or night-time operations.
- **Failure to address cumulative fatigue**, especially in short-haul operations with high-frequency rotations and service workload.
- **Lack of transparency and oversight** in how FRMS are designed and implemented at airline level.

Additionally, fatigue management remains focused primarily on **flight safety**, neglecting the **social and medical aspects** of fatigue, such as chronic sleep deprivation, health deterioration, and impacts on mental health and family life.

In addition to operational and scheduling factors, precarious employment conditions and the legal uncertainty surrounding the work contracts of many cabin crew members significantly contribute to fatigue and stress levels among the workforces. The lack of stable, transparent, and enforceable employment arrangements exacerbates mental strain and undermines crew wellbeing, ultimately impacting flight safety. EurECCA therefore calls for a stronger role for the European Labour Authority (ELA) in monitoring and addressing these irregularities, as well as enhanced cooperation and oversight between EU Member States to ensure effective enforcement of labour standards across borders.



## EurECCA's position and recommendations

### Fatigue reporting: A safety task

EurECCA emphasizes that fatigue reporting is not only a right but a core safety duty for every cabin crew member. Recognizing and reporting fatigue is critical to maintaining flight safety, protecting public health, and promoting a culture of transparency within the aviation system.

- If you witness systemic safety-relevant abuses, pressure to fly while fatigued, or similar safety violations, you are encouraged to report directly via **EASA's Confidential Safety Reporting Tool (CSR)**: <https://www.easa.europa.eu/en/confidential-safety-reporting>

This practice must be supported and protected by all aviation employers. Crew members who report fatigue should be treated with respect and never face pressure, retaliation, or discredit. Promoting a robust reporting culture is essential to reducing fatigue-related risks in European aviation.

EurECCA calls for a more effective and holistic approach to fatigue management in European civil aviation. We urge the European Commission, EASA, and Member States to adopt the following measures:

1. **Strengthen binding regulation**
  - Convert EASA "soft law" recommendations on fatigue into mandatory rules subject to parliamentary scrutiny and democratic accountability.
  - Define **minimum rest requirements** and **maximum daily duty time limits** in a way that reflects scientific data and real-life operational impact.
2. **Ensure transparent oversight and compliance**
  - Strengthen oversight of airlines' FRMS and ensure regular audits by competent national authorities.
  - Harmonize monitoring procedures across Europe to prevent **regulatory shopping** and unfair competition.
3. **Recognize fatigue as a health and occupational safety issue (H&OS)**
  - Treat fatigue not only as a safety factor but also as a **public health and occupational risk**.
  - Include fatigue prevention in the **European strategy on occupational safety and health**.
4. **Improve training and empowerment of Cabin Crew**
  - Ensure comprehensive and recurrent training on fatigue, sleep science, and countermeasures.
  - Reinforce the right of crew members to **report fatigue** without fear of reprisal, as part of a genuine safety culture.



## Conclusion

Fatigue is not just a regulatory concern – it is a daily reality for thousands of cabin crew members across Europe. As air traffic continues to grow and operational models evolve, fatigue risk will only intensify if left unchecked.

In this context, EurECCA welcomes the initiative by **Karolinska Institutet**, one of Europe's leading medical universities, which has launched a **confidential survey** to study the working conditions, health, and flight safety concerns of cabin crew. Such independent academic efforts are essential for gathering real-world data and better informing fatigue risk regulation. EurECCA encourages all crew members to take part in this confidential research initiative, which represents a key opportunity to make cabin crew voices heard and to ensure that future policies reflect their lived experiences.

Link to the survey: [Karolinska Institutet confidential survey](#)

EurECCA calls on EU institutions and national authorities to take decisive action to address fatigue as a systemic, social, and safety issue. Fair competition, safe skies, and crew wellbeing depend on it.

**EurECCA represents, protects and develops the rights  
and needs of all cabin crew all over Europe.**

**FLYING TOGETHER – PROTECTING EACH OTHER**

About EurECCA: established in Brussels in 2014, the European Cabin Crew Association, EurECCA, represents, protects and develops the rights and needs of cabin crew all over Europe. It is composed of cabin crew unions from European Union Member States as well as accession and bordering states and represents some 23,000 cabin crew accounting for 60% of all organized cabin crew in Europe. EurECCA has no political connections. EurECCA's work is around Cabin Crew working conditions, wages, social protection and health and safety at work.

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