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EurECCA Position Paper

Why Cabin Crew social local days must be separate from FTL rest

Executive Summary

EurECCA calls for a complete prohibition on counting mandatory operational FTL rest towards cabin crew social local days. The same period must never be used to discharge two distinct protections.

Operational rest under the EU Flight Time Limitations (FTL) framework and the local days free of all duty and standby required by Directive 2000/79/EC belong to complementary legal regimes and pursue distinct purposes. Operational rest protects alertness and aviation safety following operational fatigue exposure. Local days provide predictable time away from work and support health, private and family life, psychological detachment and longer-term recovery.

Clause 9 of Directive 2000/79/EC currently provides that the minimum 7 local days per month and 96 local days per year may include rest periods required by law. EurECCA acknowledges that this wording presently permits overlap. That is precisely the legal defect: minimum operational recovery can be counted towards an entitlement intended to provide genuine and predictable time away from work.

Double counting does not create additional recovery and cannot mitigate cumulative fatigue. One period remains the same finite number of hours, irrespective of the number of legal labels attached to it. Whenever mandatory operational recovery absorbs a planned social local day, cabin crew lose an independent period that should support restorative sleep, psychological detachment, family life and resilience across the complete roster.

EurECCA calls for the two protections to be clearly distinguished in law, guaranteed separately in practice and never allowed to overlap.

EurECCA's immediate priorities

- Revise Clause 9 of Directive 2000/79/EC and prohibit every overlap between mandatory FTL rest and social local days.
- Guarantee the 7 monthly and 96 annual local days independently of all mandatory FTL recovery.
- Recognise operational recovery and social local days as distinct protections that must each retain practical effect.
- Require separate rostering records and automatically re-credit every social local day affected in whole or in part by mandatory FTL recovery.

- Assess fatigue across complete roster patterns rather than through isolated compliance with minimum rest.
- Protect more favourable national legislation and collective agreements.

1 The problem

EurECCA is increasingly concerned by rostering practices that treat mandatory operational recovery as a substitute for social working-time protection. Following long-haul duties, major time-zone transitions, consecutive night duties or other fatiguing sequences, a crew member may receive an extended FTL recovery period. Some operators count that period towards pre-planned local days free of all duty and standby, without providing any separate social-rest opportunity.

The result is formal compliance with two numerical requirements but only one effective period away from work. Operational rest is then used not merely as a safety floor, but as a mechanism for discharging a separate social obligation. The harm is particularly clear when delays, roster changes or reassignment make the affected time less predictable and less usable for personal or family life.

For EurECCA, the issue is no longer how much overlap should be tolerated. No overlap should be permitted. A protection cannot retain independent practical value when the same hours are used to satisfy another mandatory requirement.

2 Two rest regimes with different purposes

Operational FTL rest forms part of the aviation-safety framework in Regulation (EU) No 965/2012, as amended by Commission Regulation (EU) No 83/2014. It establishes minimum recovery opportunities in relation to flight duty, duty time, standby, acclimatisation and preceding operational activity, with the objective of controlling fatigue-related safety risk.

Social local days form part of the sectoral European working-time framework. In this paper, “social local day” means a local day free of all duty and standby under Clause 9 of Directive 2000/79/EC. A “local day” is a 24-hour period commencing at 00:00 local time. These days must be notified in advance. Their protective function cannot be reduced to operational recovery before the next assignment: predictability and genuine disengagement from work are integral to their value.

Issue	Operational FTL rest	Social local days
Primary purpose	Operational alertness and aviation safety	Health, predictability and genuine time away from work
Reference point	Operational duties and fatigue exposure	The broader working-time and roster pattern
Planning	Determined by applicable FTL requirements	Notified in advance and usable as personal time
Typical function	Recovery before a subsequent duty	Predictable personal and family time, psychological detachment and longer-term health
Legal field	Air operations and fatigue-risk control	Social policy and working-time protection

3 The current legal framework

3.1 Clause 9 of Directive 2000/79 EC

Clause 9 requires mobile staff in civil aviation to receive days free of all duty and standby, notified in advance: at least 7 local days in each calendar month and at least 96 local days in each calendar year. It adds that those days may include rest periods required by law.

This wording currently permits overlap. Nevertheless, an operational rest period can be counted under Clause 9 only if it independently constitutes the required local day, is free of all duty and standby, was notified in advance and complies with any more favourable national law or collective agreement. A minimum hourly FTL rest does not become a qualifying local day merely because the crew member is away from the aircraft.

EurECCA does not seek to reinterpret the words “may include” as if they already imposed a general prohibition on overlap. EurECCA calls for those words to be removed or amended because they permit double counting and prevent the social entitlement from acquiring independent practical value. Legislative revision is therefore necessary.

3.2 Regulation 83 2014 and the without prejudice safeguard

Recital 4 of Commission Regulation (EU) No 83/2014 states that the Regulation is without prejudice to the limits and minimum standards established by Directive 2000/79/EC, particularly its provisions on working time and days free of duty. It also states that the FTL rules are not intended to justify reductions in existing protection and do not preclude more protective national social legislation or collective agreements.

FTL compliance is therefore not a substitute for social-law compliance.

An operator must comply with both regimes and with any more favourable national or collectively agreed rights. The without prejudice safeguard cannot, on its own, remove the express overlap wording in Clause 9, but it confirms that the safety regime must not be used to lower social protection.

3.3 The Charter and occupational safety and health

Article 31 of the Charter of Fundamental Rights recognises the right of every worker to working conditions that respect health and safety, to limits on maximum working hours and to daily and weekly rest. Directive 89/391/EEC requires employers to protect workers' safety and health and, as a general prevention principle, to adapt work to the individual. These principles support effective protection in practice rather than formal compliance that leaves a right without meaningful substance.

3.4 The MÁV START judgment

In its judgment of 2 March 2023 in *IH v MÁV-START*, C-477/21, EU:C:2023:140, the European Court of Justice held that daily rest and weekly rest under Directive 2003/88/EC constitute two autonomous rights pursuing different objectives. Daily rest must be additional to weekly rest, even where national law provides a weekly rest period longer than the EU minimum.

MÁV-START does not directly determine the interpretation of Clause 9 for cabin crew. It concerned Directive 2003/88/EC, while mobile staff in civil aviation are governed by the sector-specific Directive 2000/79/EC, which expressly permits rest periods required by law to be included in the monthly and annual days. The judgment must therefore be used as an interpretative principle by analogy.

Its reasoning is nevertheless highly relevant. Where rest entitlements have different legal functions, arrangements for their implementation should not deprive either entitlement of its practical and effective substance. The contrast between that principle and the open-ended wording of Clause 9 demonstrates why the aviation Directive must now be revised.

4 Why every overlap must end

4.1 A minimum safety floor is not a complete social policy

The FTL framework establishes minimum safety limits intended to mitigate fatigue-related operational risk. It does not regulate the full content of employment relationships, family life, psychosocial risk or the practical use of notified time away from work. Counting FTL rest towards a social local day gives a safety instrument a social function it was not designed to perform.

4.2 Predictability is part of effective rest

A day notified sufficiently in advance can be used for family responsibilities, medical appointments, social life and psychological detachment from work. Time off resulting only from an extended operational recovery requirement, a delay or a late roster change may be physically free of duty but lack the predictability that gives social rest its practical value.

4.3 Double counting does not create more recovery

Counting one period under two legal headings does not extend its duration or restorative capacity. Operational rest may provide necessary immediate recovery, but its formal classification as a social day does not create an additional opportunity for sleep, family life or mental detachment. Whenever double counting occurs, the cabin crew receives no additional period of protection.

4.4 More favourable rights remain binding

National legislation and collective agreements may provide rest entitlements that go beyond EU minima or require identified OFF days to be preserved or re-credited. Regulation 83/2014 expressly leaves those more protective rules intact. Operators cannot rely on FTL compliance to disregard them.

5 Fatigue and aviation safety

EASA recognises fatigue as an aviation-safety risk and identifies long duties, night operations, time-zone changes, irregular schedules and operational pressures as contributing factors. FTL limits are an essential baseline, but effective fatigue management also requires organisational processes, reporting, monitoring and mitigation informed by fatigue science.

Immediate recovery and cumulative fatigue are not the same. A crew member may satisfy the minimum rest requirement following one duty and still accumulate fatigue across a sequence of early starts, late finishes, night duties, standby, positioning, time-zone transitions and roster disruption. The relevant assessment must consider the complete roster and the quality and timing of actual sleep opportunities.

Absorption can worsen this risk by removing predictable time away from work that is independent of operational recovery. It can also obscure the problem in records: the roster appears compliant because one period has been credited twice, although no additional recovery has occurred. Double counting must therefore never be treated as evidence that cumulative fatigue has been effectively mitigated.

Cabin crew perform safety-critical duties, including evacuation, fire and smoke response, fume events, decompression procedures, first aid and security functions. Reduced alertness, impaired judgment or slower reaction time affects not only occupational health but also passenger and aviation safety.

6 Current compliance and the need for reform

Until the Directive is revised, an overlapping period may be counted only where it independently satisfies every condition applicable to Clause 9 and the FTL framework. Even under the present wording, a local day cannot be counted where:

- the period does not constitute the required local day or applicable single day free of duty;
- duty, standby, training, positioning or another incompatible obligation is assigned;
- the day was not notified in advance in accordance with the applicable rule;
- the minimum of 7 qualifying local days per month or 96 per year is not achieved;
- the operator counts a minimum hourly FTL rest as a full social day without meeting the separate conditions;
- a national rule or collective agreement requires separate or more favourable rest; or
- the roster is altered in a manner that removes the legal or contractual character of the planned social day.

These are minimum requirements under the law as it stands. They do not satisfy EurECCA's policy demand. The revised Directive must go further by prohibiting every overlap and requiring the automatic re-crediting of each affected social local day.

7 EurECCA policy demands

1. **Open an immediate revision of Directive 2000/79/EC.** Clause 9 must be amended so that mandatory operational FTL rest can never be counted, in whole or in part, towards the monthly or annual local days free of all duty and standby.
2. **Codify complete separation.** Operational recovery and social local days must be recognised as protections with distinct purposes and granted as separate periods. Drawing on the reasoning in MÁV-START, neither entitlement should be absorbed by the other.
3. **Protect advance notification and require automatic re-crediting.** Whenever mandatory FTL recovery overlaps a planned social local day in whole or in part, the affected day must be restored and re-notified. The same remedy must apply where duty, standby, roster disruption or another incompatible assignment invalidates the day. Collective agreements providing stronger protection must continue to apply.
4. **Require separate and auditable records.** Operators should identify operational rest and social days separately and retain data on notification, changes, duty, standby, positioning and re-crediting so that labour and aviation authorities can verify compliance.
5. **Assess cumulative fatigue across complete rosters.** Operators and competent authorities must examine sequences of duties, nights, early starts, late finishes, standby, time-zone transitions and roster instability instead of relying on isolated minimum-rest compliance.
6. **Strengthen coordinated enforcement.** Member States should promote cooperation between labour inspectorates and aviation authorities, within their respective competences, so that FTL compliance is not used as a shield against working-time and collective-agreement obligations.
- 7.

8 Proposed revision of clause 9

EurECCA proposes the following legislative principle for the revision of Directive 2000/79/EC:

Mobile staff in civil aviation shall be given days free of all duty and standby, notified in advance, comprising at least seven local days in each calendar month and at least 96 local days in each calendar year. Operational rest required under applicable Flight Time Limitations shall not be counted, in whole or in part, towards those entitlements. Every local day affected in whole or in part by mandatory operational rest, duty, standby, reassignment or another incompatible obligation shall be automatically re-credited and re-notified. This provision shall be without prejudice to more favourable rights established by national law or collective agreement.

Conclusion

The present framework permits overlap. EurECCA considers that this legal possibility is no longer acceptable. Cabin crew fatigue cannot be managed merely by restoring minimum operational fitness before the next duty. A safety rule designed to control fatigue cannot replace working-time protection, predictable private and family life, psychological detachment and longer-term health. The same hours do not provide additional recovery merely because they are counted twice. Cabin crew are not thermal machines whose batteries simply need to be recharge before the next flight.

The revised framework must impose complete separation, prohibit every overlap, preserve more favourable national and collectively agreed rights and ensure that fatigue is assessed across the complete roster. Mandatory FTL recovery must be granted first; the 7 monthly and 96 annual social local days must then be provided independently. Protecting cabin crew from cumulative fatigue is both a social obligation and an essential component of aviation safety.

Legal References

- [Council Directive 2000/79/EC on the organisation of working time of mobile workers in civil aviation](#)
- [Directive 2003/88/EC concerning certain aspects of the organisation of working time](#)
- [Commission Regulation \(EU\) No 83/2014 on flight and duty time limitations and rest requirements](#)
- [Regulation \(EU\) No 965/2012 laying down technical requirements and administrative procedures related to air operations](#)
- [Charter of Fundamental Rights of the European Union, Article 31](#)
- [Council Directive 89/391/EEC on safety and health at work](#)
- [European Commission Interpretative Communication on Directive 2003/88/EC](#)
- [EASA guidance on a single day free of duty under ORO.FTL.105\(23\)](#)
- [EASA Fatigue Risk Management overview](#)
- [EASA report on the effectiveness of Flight Time Limitations](#)
- [Judgment of the Court of Justice of 2 March 2023, IH v MÁV-START, C-477/21, EU:C:2023:140](#)

**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 50,000 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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THE PRACTICAL DIFFERENCE

ONE REST PERIOD CANNOT FULLY PERFORM TWO FUNCTIONS

Operational safety and social protection answer different questions.



TWO TYPES OF REST — TWO DISTINCT PURPOSES

FTL

OPERATIONAL FTL REST

Flight-safety obligation

THE QUESTION IT ANSWERS

When is the crew member sufficiently recovered to operate safely again?

- Addresses fatigue generated by operations
- Protects short-term alertness and flight safety
- Ends when regulatory recovery is completed

OFF

SOCIAL REST “LOCAL DAY”

Independent employment right

“LOCAL DAY” means a 24-hour period commencing at 00:00 local time.

THE QUESTION IT ANSWERS

When can the worker genuinely disconnect, plan personal and family life, and protect long-term health?

- Provides genuine disconnection from work
- Makes personal and family life predictable
- Protects long-term physical and mental health

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COUNTING ONE PERIOD TWICE IS ILLOGICAL AND UNJUSTIFIED

A single period cannot fully perform both functions.

0

NO ADDITIONAL RECOVERY

0

NO REDUCTION IN ACCUMULATED FATIGUE

0

NO GENUINE SOCIAL TIME

EurECCA’S CALL: REVISE DIRECTIVE 2000/79/EC

1

PROHIBIT EVERY OVERLAP

Operational recovery must never absorb a social rest entitlement.

2

AUTOMATICALLY RE-CREDIT EVERY AFFECTED SOCIAL REST DAY

No worker should lose social time because operational recovery became necessary.

3

SEPARATELY IDENTIFY, RECORD AND PROTECT BOTH RIGHTS

TWO PURPOSES. TWO ENTITLEMENTS. NO OVERLAP.



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EXAMPLE 1

LONG-HAUL RECOVERY ABSORBS PLANNED LOCAL DAYS

The same time is counted twice — for two different purposes.

ILLUSTRATIVE SCENARIO — THREE LOCAL NIGHTS OF RECOVERY



LONG-HAUL

Major time-zone difference

WHAT HAPPENS ON THE ROSTER

In this illustrative case, the applicable FTL provisions require three local nights of recovery at home base.

	MONDAY RETURN HOME	TUESDAY HOME BASE	WEDNESDAY HOME BASE	THURSDAY NEXT PERIOD
OPERATIONAL REST FTL recovery Safety requirement	FTL NIGHT 1	FTL NIGHT 2	FTL NIGHT 3	RECOVERY ENDS
SOCIAL REST Pre-planned "OFF" Separate social right	—	LOCAL DAY 1 COUNTED TWICE	LOCAL DAY 2 COUNTED TWICE	—

THE CONSEQUENCE

The crew member receives no genuine social rest in addition to the recovery required because of the flight. Two different rights are compressed into one period.

EurECCA'S POSITION: REST MUST NOT BE COUNTED TWICE

1

GRANT THE REQUIRED FTL RECOVERY FIRST

They respond to operational fatigue and flight-safety requirements.

2

PROTECT OR RE-CREDIT BOTH LOCAL DAYS

The two social rest days remain a separate and additional entitlement.

REQUIRED FTL RECOVERY + 2 SOCIAL REST DAYS = REAL PROTECTION



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CONCRETE COLOGNE–TOKYO EXAMPLE

THREE FTL RECOVERY NIGHTS MUST NOT ABSORB TWO LOCAL DAYS



One roster period cannot be counted twice for two different purposes.

STEP 1 — CALCULATE THE REQUIRED FTL RECOVERY

COLOGNE

MONDAY - REPORT 10:00

TIME-ZONE DIFFERENCE: 7–8 HOURS

TOKYO

LAYOVER

76 h

ELAPSED

7–8 H TIME DIFFERENCE + 76 H ELAPSED = 3 LOCAL NIGHTS AT HOME BASE

The rotation ends in Cologne on Thursday at approximately 14:00.

STEP 2 — LOOK AT WHAT HAPPENS ON THE ROSTER

Friday and Saturday were already notified as social rest days before the rotation.

THURSDAY

RETURN HOME - 14:00

FRIDAY

HOME BASE

SATURDAY

HOME BASE

SUNDAY

NEXT PERIOD

OPERATIONAL REST

FTL recovery
Safety requirement

FTL NIGHT 1

FTL NIGHT 2

Mandatory time-zone recovery

FTL NIGHT 3

RECOVERY ENDS

SOCIAL REST

Pre-planned LOCAL DAYS
Separate social right

~~LOCAL DAY 1~~

~~COUNTED TWICE~~

~~LOCAL DAY 2~~

~~COUNTED TWICE~~



THE PROBLEM

The crew member receives the required fatigue recovery, but no independent social rest.
The same Friday and Saturday are used to satisfy two different objectives.

EurECCA'S POSITION: KEEP THE TWO ENTITLEMENTS SEPARATE

1

GRANT THE THREE FTL RECOVERY NIGHTS

They are required to manage fatigue generated by the rotation.

2

RE-CREDIT BOTH PRE-PLANNED LOCAL DAYS

Friday and Saturday remain a separate social entitlement.

3 FTL RECOVERY NIGHTS + 2 RE-CREDITED LOCAL DAYS = REAL PROTECTION



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EXAMPLE 2

A DELAYED FLIGHT DESTROYS A LOCAL DAY

A planned local day disappears when duty and recovery move into it.



MAJOR DELAY
Duty crosses midnight

FROM THE PLANNED ROSTER TO THE REAL ROSTER

The delay pushes Friday's duty into Saturday and mandatory recovery follows.



EurECCA'S POSITION: THE SOCIAL REST 'LOCAL DAY' MUST BE RESTORED

1

APPLY THE MANDATORY POST-DUTY REST FIRST

It is required because of the delayed operation and resulting fatigue.

2

RE-CREDIT ONE COMPLETE SOCIAL REST "LOCAL DAY"

Saturday cannot remain counted as "OFF" when operational rest encroaches upon it.

DELAY + FTL REST $\neq$ LOST SOCIAL REST 'LOCAL DAY'



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EXAMPLE 3

RECOVERY AFTER CONSECUTIVE NIGHT DUTIES

Operational fatigue recovery must not consume monthly social rest.



WOCL

Biological low point

CONSECUTIVE NIGHT DUTIES GENERATE OPERATIONAL FATIGUE

Four or more disruptive duties between two recurrent extended recovery rest periods trigger a 60-hour second recovery period.



THE CONSEQUENCE

The crew member is free from duty, but the time is being used primarily to recover from fatigue generated by the airline's night-duty sequence.

EurECCA'S POSITION: OPERATIONAL RECOVERY AND SOCIAL REST ARE SEPARATE

1

GRANT THE 60-HOUR SECOND RECURRENT EXTENDED RECOVERY FIRST

It is a safety obligation addressing fatigue created by the operation.

2

PROTECT OR RE-CREDIT THE MONTHLY LOCAL DAYS

Predictable social and family time must remain an additional entitlement.

60-HOUR RECURRENT RECOVERY + SOCIAL REST = SAFETY AND WELL-BEING



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EXAMPLE 4

A ROSTER CHANGE ABSORBS A PROTECTED REST PERIOD

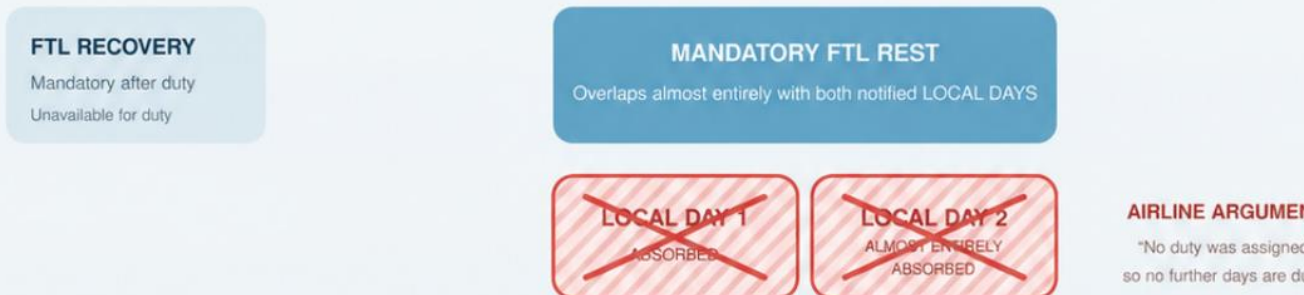
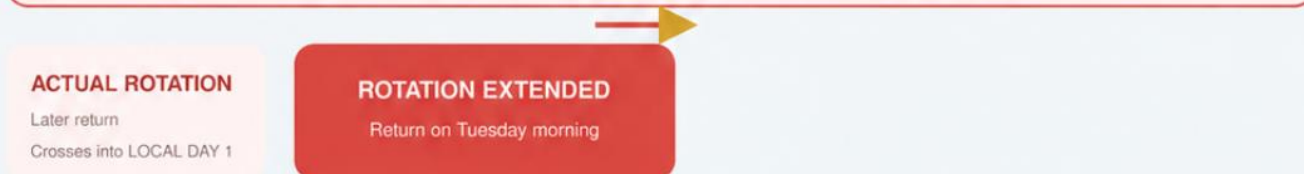
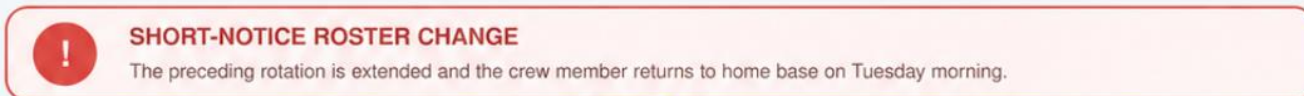


NOTIFIED "LOCAL DAYS"

Short-notice operational changes must not erase notified social rest.

THE PUBLISHED ROSTER CREATES LEGITIMATE EXPECTATIONS

The crew member organises family commitments around two notified social rest days.



EurECCA'S POSITION: MANDATORY RECOVERY IS NOT GENUINE SOCIAL REST

- 1 APPLY THE MANDATORY FTL RECOVERY FIRST**
Unavailability caused by operational recovery does not create social time.
- 2 RE-CREDIT BOTH AFFECTED SOCIAL REST DAYS**
Notified family and personal time remains a separate entitlement.

UNAVAILABLE FOR DUTY ≠ GENUINE SOCIAL REST



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EXAMPLE 5

COLLECTIVE-AGREEMENT REST REPLACED BY THE LEGAL MINIMUM



COLLECTIVE AGREEMENT

A negotiated social benefit must not be converted into operational recovery.

A COLLECTIVE AGREEMENT BUILDS ABOVE THE LEGAL MINIMUM

The additional days are a more favourable social right negotiated by trade unions.



WHAT HAPPENS AFTER A FATIGUE-INTENSIVE SEQUENCE



EurECCA'S POSITION: SAFETY RULES CANNOT NEUTRALISE MORE FAVOURABLE RIGHTS

1

APPLY THE MANDATORY FTL RECOVERY FIRST

It fulfils a safety obligation created by the operational sequence.

2

PROTECT OR RE-CREDIT THE COLLECTIVELY AGREED DAYS

National law and collective bargaining may provide more favourable protection.

SAFETY MINIMUMS CANNOT ERASE MORE FAVOURABLE RIGHTS



EXAMPLE 6

MINIMUM ANNUAL DAYS ARE ACHIEVED ONLY ON PAPER

One annual number can hide two fundamentally different purposes.



ANNUAL REPORT

THE REPORTED FIGURE APPEARS COMPLIANT

Directive 2000/79/EC requires a minimum of 96 local days free of all duty per calendar year.



“DAYS FREE OF DUTY”

The annual total reaches the required minimum.

FORMALLY COMPLIANT

BUT WHAT DO THE DAYS CONTAIN?

The report does not distinguish recovery from genuine social rest.

MANDATORY RECOVERY IS INCLUDED INSIDE THE SAME TOTAL

LONG FLIGHTS

Extended operational fatigue

NIGHT DUTIES

Circadian disruption

TIME-ZONE CROSSINGS

Jet lag and sleep disruption

MANDATORY FTL RECOVERY

Safety requirement

ONE ANNUAL TOTAL — TWO DIFFERENT PURPOSES

FTL

OPERATIONAL RECOVERY

Required to manage fatigue created by flights, nights and time-zone crossings.

COUNTED INSIDE THE 96-DAY TOTAL

≠

OFF

INDEPENDENT SOCIAL REST

Predictable time for personal, family and long-term social recovery.

NOT SEPARATELY IDENTIFIED



THE PAPER TOTAL MAY BE CORRECT WHILE THE SOCIAL PROTECTION IS INADEQUATE

The crew member receives little independent social rest beyond periods already required for operational fatigue.

EurECCA’S POSITION: IDENTIFY, RECORD AND PROTECT EACH TYPE OF REST

1 — IDENTIFY

State the purpose of every rest period.

2 — RECORD SEPARATELY

Maintain distinct FTL and social-rest records.

3 — PROTECT

Prevent overlap and double counting.

COUNTING DAYS IS NOT THE SAME AS PROVIDING SOCIAL REST