



March 2, 2021

To: REGIONAL VICE PRESIDENTS  
BRANCHES & FACILITIES

## Midnight 3-Hour Rule

As mentioned in CATCA's weekly update #7, we are very sensitive to the many stresses affecting our members.

The recent implementation of the 3-hour limit in position during midnight shifts has generated much frustration amongst the Members as this new policy in no way improves fatigue management. Moreover, the unilateral fashion in which the measure has been implemented goes against our belief that any such decisions should take into consideration input from the target population.

In March 2020, [click here](#) for the B&F; CATCA withdrew from the FSAG group as our recommendations were being dismissed, and the needs of the Air Traffic Control group were wholly ignored in the discussions. CATCA proposed to NAV Canada that we form a joint CATCA/NAV Canada FSAG group to address these issues appropriately and find solutions that better assist CATCA Member's specific needs to address fatigue management issues. To date, our repeated requests to engage NAV Canada in such discussions have gone unheard.

Recent communications from Transport Canada clarifies that the 3-hour limit sitting in position is not a regulation and not a limitation that Transport Canada is imposing. The enacted solution has been forced on CATCA Members by NAV Canada, resulting from recommendations made by a group that did not represent our Membership and, in addition, were not affected by the enactment of such a rule.

Implementing such a solution, in our opinion, requires appropriate discussion and collaboration with the affected group, something that has not occurred in a meaningful way despite several requests. Direction to CATCA by Transport Canada to consult with Nav Canada on fatigue issues cannot be complied with because of the company's refusal to re-engage in such discussions.

This is a critical topic. We are already receiving feedback indicating how these new restrictions on time in position during a midnight shift negatively affect CATCA Member's fatigue levels. If you have concerns, comments or suggestions about these new limitations, be sure to address those concerns with your direct line manager, MACCO or General Manager, explaining why you feel that the present 3-hour rule is not fit for the purpose of managing fatigue. In doing so, please remain professional and respectful to management while expressing your concerns.

Remember, CATCA is its Members, and our strength to enact change is in our members' united voices.

On Behalf of the Executive Board;

Doug Best  
President

Scott Loder  
Executive Vice President

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