

ATC Operations in Brazilian Airspace

The recent midair collision over Brazil has highlighted several issues associated with operating in that airspace that may have significant safety of flight implications. IFALPA, in coordination and consultation with our Brazilian Member Association, the Sindicato Nacional dos Aeronautas (SNA), and the International Federation of Air Traffic Controllers (IFATCA), believes all pilots should maintain a high level of situational awareness while operating into or within the Brazilian FIRs. Of particular concern is the method of both procedural and technical air traffic control used in Brazilian airspace, and the FIR boundary areas, compared to what pilots may be used to in other parts of the world. While this bulletin focuses on issues related to the pilot-controller interface, IFALPA notes that the underlying deficiencies here are due to lack of proper Governmental oversight and control of the ATC system. This is a separate issue which IFALPA, in coordination with other international agencies and entities, is working toward getting corrected.

Without commenting on the ongoing accident investigation surrounding the recent midair collision and based solely on reports from pilots of Member Associations who are experienced in operating in this environment, IFALPA wishes to ensure crews are aware of the following issues which may present operational challenges:

- Although the use of radar is now widespread in Brazilian airspace, controllers' experience operating in a full radar environment is still developing. This may lead to subtle changes in procedures that reflect many years of employing non-radar procedures. In fact, there are "mixed sectors" where radar procedures are used but part of the sector is actually not covered by radar. The controller may comment that the flight is "under surveillance" when in fact that may not always be correct.
- Controller experience is not always taken into account in scheduling ATC facility assignments for controllers. This situation could result in inexperienced controllers operating in a challenging environment involving both radar and procedural control, and poor communication, and acting with little or no supervision.
- Flight plan changes are not always properly transmitted through the entire ATC system. This can result in different sectors having parts of two flight plans (original and revised). Therefore, if a change has been made to the original flight plan a clearance for "flight planned route" should be clarified, and specific routing details confirmed with each sector. This step is very important—you **must** clarify and confirm any changes to the original flight planned route, and that you are proceeding according to the new clearance.
- As in many areas where English is not the controllers' primary language controllers may speak limited English. Pilots must also be aware that some controllers may sound proficient in the use of English as a result of these controllers either speaking with a familiar accent or due to their excellent pronunciation of certain words. In this situation the actual proficiency of the controller's English skills could be masked, and this could exacerbate confusion generated by the flight plan change issues noted above. Therefore, strict adherence to ICAO standard phraseology is highly recommended.

- There are no national or airport standards for engine-out departure procedures in Brazil, thus each operator may have different procedures. Therefore, controllers may not know what procedure is being followed in the event of an engine failure. Under these circumstances high cockpit workload and language proficiency issues can add to the difficulty in effectively communicating the intended flight path to ATC.
- Pilots accustomed to more experienced ATC systems in other operating areas may not realize the need to clarify instructions, avoid assumptions, or rely on the communications and situational awareness between pilots and controllers that may otherwise prevent errors. Similarly, pilots who inadvertently request an incorrect or inappropriate altitude, routing, etc, may not be challenged by a controller.

One of the consequences of today's highly accurate navigation systems is that their precision can result in aircraft being on the same route with little or no lateral deviation. While the Strategic Lateral Offset Procedure (SLOP) that is in use in other areas of the world does not yet exist in South America, some Member Associations are actively debating the benefits of this concept and may soon put forth positions encouraging the use of this procedure.

Recommended Actions:

- ▶ Pilots operating in and around Brazilian airspace should ensure they are aware of all operational guidance published by their company and review company training materials if any have been provided.
- ▶ Always strictly adhere to ICAO standard phraseology for all communications and do not assume that the controller is fully aware of any changes that have been made to the flight plan.
- ▶ Consider using all available exterior aircraft lighting when changing altitudes.
- ▶ IFALPA urges all pilots who are familiar with operations in and around Brazil to share that knowledge with their home Association and with IFALPA so that subsequent follow up bulletins can be provided to the international community.
- ▶ IFALPA also recommends that pilots operating in this airspace, as is the case in all operations, work closely with their company safety and operations departments to ensure that all crews have the most comprehensive information available regarding the potential hazards of operating in this area.

IFALPA issues this information for information only. In all cases pilots should follow their company's procedures.

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