



European Union Aviation Safety Agency

CONCEPT PAPER¹

GROUNDHANDLING ROADMAP

OPERATIONAL STANDARDS

¹ The cover page might be adjusted following the format of those bodies it is addressed to.



EXECUTIVE SUMMARY

The initial phase of EASA's project to develop a roadmap for a European regulatory framework for the provision of groundhandling (GH) services at EU aerodromes confirmed that a common approach could offer a safer and more efficient service. This concept paper should be read in combination with a suite of related concept papers that will be discussed at EASA's first GH conference in March 2019. Related concept papers refer to management system for GH, oversight of GH activities, ground support equipment (GSE), training of GH personnel, and staff turnover. This concept paper is intended to trigger discussions on the establishment of a regulatory framework for a management system for GH service providers (GHSP)

Although industry has already taken initiatives to harmonize operational standards, in practice there are many cases where for the same activity different standards apply. This can have a negative effect on the performance of the whole aviation system in Europe, and more specifically safety, economic and social impacts are the more evident.

This concept paper includes a brief description of the current situation in Europe and it also describes the shortcomings that have been identified by the different stakeholders, which will remain unresolved if no action is taking place at EU level.

The concept paper is not a rulemaking exercise; therefore, it does not propose options. Instead, it lists a number of actions/objectives that should be considered to address the issue. This list should generate further discussion on critical areas to support decision making on the best intervention strategy.

The aim of setting up a regulatory framework for operational standards is to reduce the number of accidents and incidents caused by GH activities and to increase the overall safety level of the aviation system. Identifying high level, technology neutral minimum operational standards can contribute to this objective. Finding a proper balance between flexibility to cater for aircraft and aerodrome operator specific elements and the need to provide a stable and simple framework of procedures for GH staff will allow to improve the safety of GH operations. Decisions on the appropriate level of adherence to such standard must include an assessment of the accountabilities of each stakeholder.



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1 Background

Groundhandling is a significant and critical part of the aviation industry. Considerations on aircraft characteristics, an increase in ground support equipment (GSE), faster turnarounds, cost reduction programmes, minimal training and high staff turnover contribute to the challenge of improving operational safety. Ground operations on aprons have become increasingly complex due to the growth of air traffic and the proliferation of third party GHSPs in addition to the numerous requirements set by air operators or aerodromes.

The safety, reliability and consistency of flight operations must begin long before take-off and must continue on the ground. Aprons are often the most congested and busiest areas of an aerodrome with aircraft turnarounds carried out under significant space and time constraints.

The implementation of Council Directive 96/67/EC of 15 October 1996 on access to the GH market at Community airports changed the landscape at European airports significantly. The Directive does not touch, however, operational requirements. Until now, these have been left to the discretion of individual Member States, air operators, aerodrome operators and GHSPs.

The publication of Regulation (EU) 2018/1139 brought the provision of GH services under the EU regulatory framework by empowering EASA to propose actions in this specific area. The Regulation recognizes the interfaces of the GHSPs with the aerodrome operators and the aircraft operators and gives some generic directions on how these services should be provided.

Aim of this concept paper

The aim of this concept paper is to:

- propose actions for a GH Roadmap, including
 - assessing to what extent operational procedures are harmonized;
 - performing a gap analysis between the existing operational practices and where the industry should aim to be, in order to identify areas requiring improvement;
 - identifying possible actions to address the gaps, i.e. rulemaking activities, safety promotion, other actions that do not create regulatory requirements or a combination of the three.

2 Description of the issue

2.1 Identification of the issue

Both ICAO Annex 6 and Regulation (EU) No 965/2012 require aircraft operators to develop policies and procedures for third parties that perform work on their behalf. This typically includes procedures that are necessary for the safe provision of GH, including aircraft type specific requirements. These procedures are normally included in a GH Agreement between the air operator and the GHSP.

For general and business aviation, the responsibility rests with either the aircraft owner or the pilot-in-command. General and business aviation operations occur in an environment with variable operational and on-demand business requirements. Unlike scheduled flight operations as carried out by airlines which transport passengers who have bought a ticket for a pre-defined route, where the provision of GH services is arranged through agreements, general and business aviation operators² normally request services on ad-hoc short notice due to the on-demand nature of this business model.

To be competitive GHSPs must offer a multitude of services to a number of different air operators. The operational requirements for the same activity may differ significantly between aircraft operators. This increases the complexity of the operation for the GHSP.

² Commercial non-scheduled flights operators and non-commercial operators flying with complex aircrafts



In an attempt to minimise the ground handling safety risks, some organisations have already developed operational standards and recommended practices. The wider application of these industry standards and practises would improve the safety in aviation.

General and business aviation operations occur in an environment with variable operational and business requirements, therefore a single aviation solution for ensuring the safety and regularity of GH operations may not always be possible. Therefore, GHSPs are required to develop procedures to accommodate local differences.

Furthermore, aerodrome operators are responsible for the safe and efficient operation of the aerodrome. For many issues, the aerodrome operator takes a leading role, for example in the emergency response planning, winter operations, low visibility procedures, etc. For other areas, the aerodrome operator has a coordinating role e.g. for the activities related to the ground operation of the aircraft, such as stand and gate allocation, provision of ground infrastructure, allocation of space, refuelling, access to the apron, etc.

From the analysis above it is evident that GHSPs are obliged to follow the operational requirements of the air operator/aircraft operator and the aerodrome operator. GHSPs have to face many challenges due to the differences between the operational practices for the same activity and the need to account for local specificities but also the need to establish a balance between safety and commercial pressure (cost savings and shorter turnarounds).

This was confirmed by the stakeholders during the interviews, where they expressed the opinion that different operational requirements for the same activity can have detrimental effects on the GHSPs by:

- increasing the risk of human error which could lead to aircraft damages and endanger flight safety;
- generating the need for customized training to address the individual requirements of each aircraft operator also increases training cost and reduces staff availability.

2.2 Identification of the possible ways forward

The following actions are proposed for a way forward:

1. Identify minimum operational standards which can be applied by GHSPs across all stations and locations to allow significant improvements in performance as well as operational safety. These standards should:
 - a. allow for flexibility to accommodate the different needs of air operators/aircraft operators, aerodrome operators and GHSPs as well as different types of operation;
 - b. consider local specificities;
 - c. be technology neutral and allow innovation.
2. Design a regulatory framework for the efficient coordination between air operators, aerodrome operators and GHSPs with a view to further develop, implement and apply of these operational standards.
3. Identify ways to recognize and promote current internationally accepted industry practices.
4. Ensure that operational standards are communicated to the staff concerned by means of training, safety promotion, etc.
5. Define where the accountabilities of each stakeholder start and end with a view to identify overlaps and describe mechanisms to address conflicting positions and contradictory performance indicators between all parties involved in GH.
6. Empower GHSP to control certain operational risks as part of their management system. That means, allow GHSPs to apply more stringent safety procedures than the aircraft operator if this is based on the GHSP's risk management process).



7. Propose ways to give access to safety relevant information that is specific to the aircraft model to all stakeholders.

2.3 Analysis of impacts of the possible ways forward

2.3.1 Safety impact

A significant positive safety impact is expected from the harmonization to the extent possible of operational standards for the following reasons:

1. Staff would have to follow standards, allowing variations only when these enhance safety. This would reduce confusion and work pressure;
2. Similar procedures would reduce the risk of errors that could lead damages to aircraft or endanger flight safety;
3. The safety risk resulting from deploying staff to service different air operators would be reduced.be.

2.3.2 Environmental impact

None.

2.3.3 Social impact

Harmonization of the operational standards will have a positive social impact on staff working for GHSPs. Harmonized procedures will reduce the stress of staff because tasks will be performed in a more straight-forward manner. Furthermore, common operational standards are better understood and accepted by the staff, creating more confidence during the performance of the tasks.

When operational standards have a general basis that is commonly accepted on a wide scale by both GHSP and aircraft operators, staff mobility from one GHSP to another or even from one aerodrome to another would increase significantly.

2.3.4 Economic impact

Harmonization of the operational standards will have an economic benefit for the whole system for the following reasons:

1. The resources needed by the GHSP to assess and document differences between the operators' procedures will be reduced.
2. The time and resources needed by the air operators to provide/update basic operational procedures for their GHSPs will be reduced.
3. The time required for staff training will be reduced decreasing therefore training cost and increasing staff availability to service the operations of more air operators. This also makes it easier for staff to move from one GHSP to another.
4. The compliance monitoring process will be simplified and consequently the costs of audits and inspections will be reduced. Coordination between auditing organisations should ensure complementary layers of auditing instead of building up additional layers.

2.3.5 Proportionality issues

As explained before, GHSPs have to satisfy the different requirements of their customers (aircraft operators) and different business models (e.g. low-cost operators, business and general aviation operators). The proposed flexible approach, will enable GHSPs to adjust their procedures to the specific needs of the different business models.



2.3.6 Impact on regulatory coordination and harmonisation

Regulation (EU) No 2018/1139 brought under the EU regulatory framework the provision of ground handling services, therefore issues which are currently handled at national level and in many cases under a different way, will be managed in a more harmonized way. This will create more confidence in the system but also allow a better coordination between the Member States, especially when overseeing organisations providing services in more than one State. Furthermore, ICAO does not have currently specific requirements for GHSPs³. Having identified the critical role that GHSPs play in the safety and efficiency of operations, ICAO developed guidance material to the States in how to create a framework for the provision of the service. In this respect, EU initiative could be used as a show case for worldwide application.

2.3.7 Impact on existing organisations including the Agency

The provision of GH services is not a new activity. The EU initiative will attempt to minimize the impact to affected organisations by selecting the most appropriate tools to maximize benefits. The objective will not be to create a new system, but to build on the existing practices and improve where it is necessary. Although some effort will be required to adapt to the new system, this impact is out-weighted by the safety, social and economic gains.

3 Conclusion

The Concept Paper proposes to work towards the harmonization of the operational standards for the provision of ground handling services.

EU aviation industry will benefit from this harmonization for the following reasons:

- improve the level of safety in ground operations;
- ensure the cooperation and coordination between the different stakeholders;
- reduce the overall cost;
- increase staff's confidence into the system and improve their well-being; and
- facilitate staff mobility.

³ Although there are no ICAO Annexes or SARPs, ICAO has developed a Ground Handling Manual which offers some useful Guidance Material. The final version will be published on the ICAO-Net by the end of Q1 2019. The printed, saleable version will follow in a couple of months.

