



# European Union Aviation Safety Agency

## CONCEPT PAPER

## GROUNDHANDLING<sup>1</sup> ROADMAP

## Management System

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<sup>1</sup> For a list of activities included in the groundhandling (GH) concept, see the Annex to the Council Directive 96/67/EC and the definition of ‘groundhandling service’ in [Regulation \(EU\) 2018/1139 of the European Parliament and of the Council of 4 July 2018](#).

A definition of groundhandling is provided in ICAO Annex 6 Part I and Part III: ‘Services necessary for an aircraft’s arrival at, and departure from, an airport, other than air traffic services’.



## 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 oversight of GH activities, ground support equipment (GSE), training of GH personnel, operational standards for GH services, 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).

The management system is an overarching concept. It is already applied in the European regulations on air operations, aircrew, ATM/ANS and aerodromes, and is currently being introduced in the airworthiness domain. Management systems require an organisation to manage in a holistic manner all key processes, such as safety management (SMS), compliance monitoring, training of personnel, documenting of policies and procedures, maintenance programmes, as well as all applicable health and safety requirements, environment and security requirements.

This concept paper includes a brief gap analysis between the existing status regarding the implementation of a management system by GHSP and what needs to be done to cover those gaps. It also identifies the need to enhance the interfaces between all parties involved in GH activities. GH is a domain that develops its activities at the interface between aerodrome operations and aircraft operations. Developing a common framework to address GH becomes a logical prerequisite for a holistic approach to managing safety in a highly complex system such as aviation.

This concept paper also describes the shortcomings that have been identified by GH stakeholders, which would remain unsolved if the EU regulator does not propose any action to fill the gaps.

This concept paper is not a rulemaking exercise. Therefore, it does not propose rulemaking options. Instead, it lists a number of actions for the roadmap to address the identified gaps. Further discussions on critical areas will be necessary to support decision making on the best ways forward.

The aim of setting up a regulatory framework for the integrated management system of the GHSP is to reduce the number of accidents and incidents caused by GH activities and to increase the overall safety level of the aviation system. An organisation can only prioritise safety risks and manage its resources effectively to obtain optimal results if it has a clear understanding of its role and contribution to aviation safety.

Moreover, extending the concept of an integrated management system to the GH sector aims at enhancing the confidence in GHSP as equal partners in the aviation safety chain.

At the same time, putting the GH operations on the European safety map helps to give proper recognition to the importance of the GH domain in the broader safety picture in aviation.



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# 1 Background

## Present stage of the process

Groundhandling is one of the largest safety-critical domains of aviation that – until recently – had been left outside the EU regulatory system for aviation safety.

ICAO Annex 19 mandates the establishment and implementation of a safety management system by service providers to all the States that are members of the Chicago Convention. However, Annex 19 covers only the aviation domains that are subject to state certification. Therefore, GH is not yet addressed in Annex 19 as a separate activity. That means, GHSPs are not required to implement an SMS. The way in which the ICAO standards are transposed into the national rules and implemented differs from state to state.

The European regulatory system for aviation safety uses the concept of a management system, which integrates the SMS requirements along with the elements that predate the introduction of SMS, i.e. compliance monitoring (sometimes called quality assurance), training of personnel, documented policies and procedures, as well as other means and methods to achieve compliance with the relevant rules.

Today the implementation of a management system is not required by the European regulatory system for GHSPs. Only with the recent entry into force of the New Basic Regulation (Reg. (EU) 2018/1139) GHSPs will be expected to implement and maintain a management system and to establish an occurrence reporting system (Annex VII)<sup>2</sup>.

The implementation of a safety management system (SMS) is already mandatory for GHSPs under national legislation in several European states.

Consulted stakeholders have identified the management system of GHSP (SMS key processes included) as one of the key areas that need to be addressed in the analysis of a future regulatory activity. In addition, the draft Ground Handling Manual produced by ICAO's Ground Handling Task Force (GHTF) also 'strongly recommends that SMS principles combined with industry best practice should be adopted by GHSPs'<sup>3</sup>.

All stakeholders supported the idea that a management system should become mandatory for GHSPs to foster a consistent implementation of a safety management approach. The necessary provisions for SMS implementation in the GH domain already exist in broadly tested and widely accepted industry standards.

## Aim of this concept paper

The aim of this concept paper is to

- propose actions for a GH Roadmap, including:
  - assessing to what extent a management system framework (SMS included) that is compatible with the concept of management system in other EASA rules has already been implemented by GHSPs;
  - performing a gap analysis between what exists today and where we aim to be, in order to identify the areas requiring improvement;

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<sup>2</sup> See points 4.2.1 and 4.2.2 of Annex VII of Regulation (EU) 2018/1139: '4.2.1 As appropriate for the type of activity undertaken and the size of the organisation, the provider shall implement and maintain a management system to ensure compliance with the essential requirements set out in this Annex, manage safety risks and to aim for continuous improvement of this system. Such system shall be coordinated with the management system of the aerodrome operator. 4.2.2 The provider shall establish an occurrence reporting system as part of the management system under point 4.2.1 in order to contribute to the aim of continuous improvement of safety. Without prejudice to other reporting obligations, the provider shall transmit all occurrences to the reporting system of the aerodrome operator, the aircraft operator and, if relevant, to that of the air traffic service provider <...>'.

<sup>3</sup> See point 1.4.4 of the draft ICAO manual on Ground Handling of the GH task force, final draft, version 2, revision 12.



- identifying possible actions to address the gaps, i.e. rulemaking activities, safety promotion, other actions that do not create regulatory requirements, or a combination thereof.

## 2 Description of the issue

### 2.1 Identification of the issue

Many incidents and accidents occur during the provision of GH services. They result in damage to aircraft and equipment, and injuries or even death of GH staff. Until recently GHSPs have been the only major safety-critical stakeholder group not directly subject to European aviation safety regulation.

GH is a complex activity involving multiple actors. Often GHSPs offer a wide range of services in various areas of an aerodrome or even outside the aerodrome premises; moreover, different GHSPs may conduct different services on the same aircraft turnaround. It is worth highlighting that GH is an industry branch with a tremendous competition and massive commercial pressures.

The EU legislation requires a management system (SMS processes included) from aerodrome operators and aircraft operators. This management system framework requires that the contracted services used by these operators must conform to the requirements applicable in the respective domain.

Whilst some European Member States have developed robust SMS requirements for GHSPs and an implementation programme, other Member States have adopted industry standards as a soft law or have adopted a mixed approach.

Some GHSPs apply an SMS on a voluntary basis. Aircraft operators performing GH self-services must include the GH activities under their management system as per current requirements for aircraft operators (Reg. (EU) No 965/2012, the ORO.GEN.200 series). The audits of national authorities (NAAs) indicate that many GHSPs have a process in place to manage safety-related issues. However, these processes are often immature or not especially useful. The degree to which the implementation of these SMS is effective or even efficient varies by and large.

In most cases, NAAs do not oversee the management system including its SMS elements of the GHSP directly; consequently, there is no state oversight assessment of its effectiveness. The lack of a defined responsibility for NAAs to oversee GHSPs makes it difficult to implement improvements, even when shortcomings have been observed. In addition, any promotion of a good management system or best practices is hindered by this uncoordinated oversight.

Consulted stakeholders highlighted also the lack of an overarching system to regulate the interfaces of management systems between the parties involved in GH activities, SMS-related interfaces included. One consequence of this is that the oversight requirements, where they exist, are not coordinated between various stakeholders (GHSP's own compliance monitoring function, aircraft operators, aerodrome operators, MSs NAAs). This leads to multiple audits being performed to a single GHSP by all these stakeholders, resulting in multiple verifications of the same GH processes or tasks. At the same time, other processes may remain outside the auditing scope. Undetected shortcomings could become a serious unobserved safety hazard. The auditing process is time-consuming and can, reportedly, take up to 80 man-days a year for a large GHSP, significantly decreasing productivity.

The lack of an interface is also reflected in the SMS area: the safety performance indicators established by an aircraft operator may not be compatible with those established by the GHSP for the same task. Aircraft operators are focused on aircraft damage and operational impact, while GHSP are focused on the severity of the damage (without operational impact) and injuries to persons. Moreover, several aircraft operators may establish different safety performance indicators for the same GH task delivered by the same GHSP to the turnaround procedures for the same type of aircraft. This could lead to a hazardous situation, especially in the context of high time pressure, and is not addressed by the current state of facts.



The training requirements often overlap too. A GHSP must — despite providing training per widely recognised industry standard to its relevant personnel on a certain task for a certain aircraft type — train the same persons again, leading sometimes to a large number of operator-specific training sessions on the same task to the same aircraft type.

The interface aspect may also concern, for example, the compliance monitoring process, as there is also a lack of coordination on compliance issues with occupational health and safety or security requirements. A functional interface to establish good coordination of GH compliance monitoring would increase effectiveness in this area and consequently reduce the audit time and costs.

The aerodrome operator has direct control over certain elements with a direct impact on the delivery of GH services. For example, apron design, driving procedures, vehicle licensing, provision of fixed ground service equipment (GSE), real-estate rental, conditions to grant an operating licence to the GHSP etc. However, the aerodrome operator is often not informed about, and might not have direct access to other services provided by the GHSP; among these, operational GH procedures, flight dispatch, performance levels set out in a service level agreement (SLA) between the GHSP and the aircraft operator, types of activities provided by the GHSP on behalf of the aircraft operator. Some of the contractual clauses (mostly operations-related ones, such as on-time performance), with a direct impact on the GHSPs revenues, might generate unintended consequences on safety performance. Such conditions should be properly mitigated.

There is currently no regulatory framework to foster an (effective) exchange of safety-relevant information between the parties involved in the processes of preparation and departure/arrival of flights. Regulation (EU) No 376/2014 is mandatory for all actors involved in GH activities. The reporting line is often unclear; the transmission of data from occurrence reports or best practices is either duplicated or fragmented between the aircraft operator, the GHSP, the aerodrome operator and the NAA, with no proper coordination. There is no common database which could furnish safety-relevant data to help GHSP to develop an effective SMS or safety actions in common with other parties involved in GH operations. Resources are consumed with no additional value for safety or for business.

Establishing a framework for an interface in this regard would be beneficial. Setting up a common, easy-to-use reporting system and clear reporting lines would enable an easy exchange of safety-relevant information. This would eliminate both duplications and fragmentation in reporting between the various organisations. It would also encourage the development of a reporting culture, resulting in more safety-relevant data collected, which would help GHSP to improve their SMS in a continuous loop. Establishing a common database would enable data sharing. Data sharing would boost the safety performance of all affected organisations.

Establishing requirements in this direction would improve the safety performance of any of the parties involved in GH operations<sup>4</sup>.

This concept paper tries to identify possible actions to enable building confidence in the management systems of the actors involved in GH activities. While the main driver for any action in this context remains the desired increase of safety, we should not forget that efficiency gains will come as an advantageous by-product. In a risk-based oversight environment, measureable safety increases are automatically followed by a reduction of oversight pressure. An increase of trust in the other organisations' management system would bring efficiency gains that will benefit all the organisations involved in GH activities.

The interviews with affected stakeholders and the subsequent consultation with the expert group members clearly demonstrated the need to mandate a scalable integrated management system framework for GHSPs.

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<sup>4</sup> As an example of good practice, see Luton Safety Stack (research project for a joint SMS of all parties): <https://skybrary.aero/bookshelf/books/4159.pdf>



The future requirements should enable the GHSP to establish and implement a management system adjusted to the size, nature and complexity of their operation, as well as to the context of the operation. Alignment of the new requirements with the similar ones in the other domains will enable good functionality of the interface between the GHSP, the aerodrome operator and the aircraft operator, based also on a common taxonomy.

A high number of GHSPs already today comply with broadly recognised industry standards. It is of utmost importance that the future requirements enable recognition of such standards as a basis for operational safety performance to reduce the aforementioned audit burden.

Existing documentation and guidance on SMS is mostly built to serve the needs of air operations. While the SMS concept with its main components should remain the same, regardless of the activity performed, the size, nature or complexity of GH operation, most of the safety hazards, risks, and performance indicators are fully specific to the GH activities (see [EASA ASR 2017](#)<sup>5</sup> where a first safety risk portfolio for [aerodromes and] GH has been developed). Therefore, the management system for GHSP can be built using the already existing knowledge, while at the same time addressing the specific needs of GH operations and workers. The building of an effective management system should start from simple to complex, in order to keep it useful and open to further improvement.

It is important to recognise that safety management will be a continuous activity, as hazards, risks and the effectiveness of safety risk mitigations will change over time.

The key safety management processes are supported by a compliance monitoring function as an integral part of the management system for safety. Most aviation safety regulations constitute generic safety risk controls established by the 'regulator'. Therefore, ensuring effective compliance with the regulations during daily operations and independent monitoring of compliance are fundamental to any management system for safety. The compliance monitoring function may, in addition, support the follow-up of safety risk mitigation actions. Moreover, where non-compliances are identified through internal audits, the causes will be thoroughly assessed and analysed. Such analysis in return supports the risk management process by providing insights into causal and contributing factors, including human factors, organisational factors and the environment in which the GH organisation operates. In this way, the outputs of compliance monitoring become some of the various inputs to the safety risk management functions.

On the other hand, the safety risk management processes may be used to determine focus areas for compliance monitoring. This way, internal audits will inform the organisation's management of the level of compliance within the organisation, whether safety risk mitigation actions have been implemented, and where corrective or preventive action is required. The combination of safety risk management and compliance monitoring should lead to an enhanced understanding of the end-to-end process and the process interfaces, exposing opportunities for increased efficiencies, which are not limited to safety aspects.

In summary, GHSP integrated management system requirements shall cater for the establishment and implementation of a system that is compatible with the one of the aerodrome where it delivers its services and with that of the aircraft operators it serves.

## 2.2 Identification of possible ways forward

The following actions are proposed for the roadmap:

1. Develop minimum requirements for the establishment and implementation of an integrated management system for GHSP, leaving flexibility for these to implement the system and processes commensurate with the size, nature and complexity of the services provided. Such a management system should express the overall philosophy and principles of the GHSP with regard to safety. It should

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<sup>5</sup> [EASA Annual Safety Review 2017](#) and [EASA Annual Safety Review 2018](#).



provide a holistic approach, including, for example, requirements on SMS policies and practices, compliance monitoring, management of documents and records, training of personnel, security, occupational health and safety, environmental management, and operational policies and procedures. Although the concept of a management system is already implemented in the air operations domain, aircrew, ATM/ANS, aerodromes and soon in the airworthiness domain too, it should be clarified that the aviation regulatory framework cannot and does not establish provisions for domains that are outside its remit. The integrated management system approach is intended to encourage organisations to embed safety management and risk-based decision-making into all their activities, instead of superimposing another system onto their existing management system and governance structure. In addition, if an organisation holds multiple organisation certificates within the scope of Regulation (EU) 2018/1139, it may choose to implement a single management system to cover all its activities. Integration will remove any duplication and exploit synergies by managing safety risks across multiple activities.

2. Establish a framework to address outsourcing of GH services while clarifying the distribution of responsibilities between the parties involved, where this is the case.
3. Develop and implement an effective interface between the parties involved in GH activities. The elements of such interface should be clearly identified, i.e. they should include the safety responsibilities and the overlapping SMS aspects.
4. Describe the requisites for the interfaces of the management systems (SMS processes) of the GHSP and the other organisations involved in GH activities. The management system of the GHSP should contain a main part applicable to the entire organisation, as well as additional elements proving compatibility with the management system of the aerodrome(s) and aircraft operator(s) with which they interact.
5. Extend the scope of authority requirements to include oversight of the GHSP, to reflect the new requirements on the management system for GHSPs and on the new interfaces. Mandate swift exchange of safety-relevant information from occurrence reports and best practices between the parties involved in GH activities while maintaining compliance with the General Data Protection Regulation.
6. Ensure that the new GHSP requirements use a common taxonomy with that of the existing EU requirements on management systems.
7. Discuss the need to establish minimum requirements for a GHSP to receive permission to deliver services at a certain aerodrome.
8. Identify existing guidance on the development and implementation of a management system, interfaces and management of outsourcing of GH services by GHSP and aircraft operators to third parties (e.g. in industry standards).
9. Propose ways to determine and assess the complexity of operation of GHSPs (leading to certain alleviations in the implementation of the management system for the organisations whose type of operation in a given context implies a lower level of risk).

The existing EU requirements in the domain of air operations<sup>6</sup> and aerodromes<sup>7</sup> should serve as a basis. The requirements on the management system should be twofold, addressing both the competent authority and the GHSP.

It is recommended to use the ICAO Ground Handling Manual especially to address the interface topic and the building of a strong and effective safety management system (ch. 1.4.7).

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<sup>6</sup> Reg. (EU) No 965/2012 on air operations: the ARO.GEN.200 series for competent authorities and respectively the ORO.GEN.200 series for air operations organisations.

<sup>7</sup> Reg. (EU) No 139/2014 on aerodromes: the ADR.AR.B series for competent authorities and respectively the ADR.OR.D series for aerodrome operators.





Safety promotion activities are needed to increase confidence in the benefits of having a management system. For instance, non-regulatory activities such as safety promotion activities could be developed to explain the meaning and purpose of a management system or of an SMS.

## **2.3 Analysis of impacts**

### **2.3.1 Safety impact**

The lack of clear lines of accountability and responsibility, especially where responsibilities of the several actors involved in GH activities overlap, can generate an increase in the safety risk.

The lack of requirements regarding the exchange of safety-relevant information generates an uncoordinated, sometimes obstructed or even disrupted flow of information between the parties involved in the GH activities.

The lack of a clear mandate for the oversight of GH activities does not encourage the competent authority's promoting good practices in the SMS or in the management system.

A significant positive safety impact is expected with the establishment of common requirements for a management system of GHSP that would address all the gaps identified above. The approach proposed is expected to:

- increase the trust among stakeholders that services are delivered to the expected standard, adjusted to the type of business of each GHSP and each aircraft operator, and to the specific context of the aerodrome;
- reduce considerably the number and severity of annual incidents and accidents caused by GH activities, thus reducing damages to equipment, injuries to human beings and harm to the environment;
- improve communication of safety-relevant data and information between the parties involved in ground operations through a functional interface;
- establish clear lines of accountability and responsibility, avoid gaps and overlapping responsibilities;
- improve the reporting behaviours by providing a framework of a formalised management system, which can be more easily overseen;
- support GHSPs with the development of a positive safety culture.

### **2.3.2 Environmental impact**

Integrating environmental aspects into the management system will encourage the industry to shift to a more environmental friendly operation.

### **2.3.3 Social impact**

The management system incorporates a training element and addresses SMS with its safety culture and just culture components. These are also expected to address the social dimension and have a positive outcome by providing sound requirements for the protection of reporters and an agreed just culture policy in connection with building up a sound organisational culture.

Raising awareness on the safety aspect of the jobs in GH can be achieved through safety promotion as part of the GHSPs SMS processes, through training of personnel, as well as through authority oversight.

A European regulatory framework on aviation safety, including requirements for GH and in particular requirements for a management system for GHSPs, will recognise the GH domain as one important part of the aviation safety chain. With this recognition it will also be easier for the general public to understand why



GH and the work carried out by GH professionals is a crucial element of aviation safety. Proper recognition granted to the whole GH domain by the citizens and the business partners will raise the prestige of such jobs.

Training with a focus on the human as a vital resource should raise GH employees' awareness of safe behaviour for themselves in a demanding and hazardous work environment.

The training system should enable the development of a career path, which would consequently put a particular job into perspective and this way ensure a higher job stability. The social status/prestige of a position in GH would thus be positively impacted. Higher job stability would also have a positive impact on the safety in daily operations.

#### **2.3.4 Economic impact**

Since the introduction of ICAO Annex 19 on Safety Management Systems for "service providers", we already see a wide global variation in maturity levels of SMS implementation within States and industry. The concept of SMS for GHSPs brings in a wide scope of additional activities: ground supervision, flight dispatch and load control, passenger handling, baggage handling, freight and mail handling, apron handling of aircraft, aircraft services, fuel and oil handling, and loading of catering). Potentially this is now bringing in activities (e.g. flight dispatch, load control, cargo preparation) that may be provided off airport, sometimes in a different country and outside of the EU (but still for EU aircraft operators).

The development and implementation of a management system should be pragmatic and not necessarily require high-technology tools. Normally such system would build on processes (e.g. documented training, reporting system, documented procedures) that GHSPs have already implemented. It might happen that dedicated resources or expertise are needed to adapt to a European framework and to develop and maintain the management system. The additional burden should be small, for non-complex/small GH operations. At the same time, many European Member States already mandate today some sort of management system. Therefore, a greater need for investment is foreseen for GHSPs who have not implemented any system until now. For GHSPs who comply with a broadly accepted industry standard, the additional costs should be minimal.

For large organisations with complex activities, implementing an integrated management system (including the SMS) requires a certain level of knowledge and skills in order to process the data collected, assess the risks, develop safety performance indicators and propose mitigations. This may create the need for additional positions in an organisation with an associated cost.

Improved safety standards implemented through the management system will reduce the direct and indirect costs due to injuries from accidents and incidents and absenteeism.

The number of accidents and incidents will also be reduced. This will eventually result in the decrease of GHSPs insurance premiums.

A decrease of costs is also eventually expected through the reduction of the number of audits performed yearly to the same GHSP by several organisations that use its services.

Additional costs are foreseen for competent authorities due to the extension of scope to include oversight of GH activities. GH inspectors will have to be trained for the oversight of GH activities, as well as for the assessment of the GHSPs management system. On the other hand, competent authorities should be already overseeing the way in which the aircraft operators under their jurisdiction manage safety-related issues connected to the GH services provided to them.

#### **2.3.5 Proportionality issues**

The future requirements need to be high level to allow for adapted ways to implement a management system for less complex GHSPs with low level of risk. Guidance on how to assess which GHSP should benefit from such alleviations (i.e., GHSP that consider themselves to have a non-complex operation) should also be addressed in the future actions.



The size of activity of non-commercial operations is not negligible: Europe sees significant transient business jet operations from a global market. It is clear that one size does not fit all and scheduled airline activity is different from business aviation. Therefore, the GH services delivered to non-commercial operators or on-demand aircraft operators should not be overlooked and the future regulatory framework should also cater for specific GH services needs of non-commercial and on-demand operators.

### **2.3.6 Impact on regulatory coordination and harmonisation**

The future rules will have to enable the application of existing industry standards, guidance material and tools. They will also need to be aligned with the relevant ICAO standards and European regulations. Viewed from the opposite angle, it might be necessary to amend existing EU regulations and ICAO standards to generate the needed links to enable the interface between existing regulations with the future framework for GHSPs.

That means, the future management system for GHSPs must integrate with the management systems of the other parties involved in GH activities which are already regulated at European level (air operations, aerodromes, competent authorities).

The future European requirements on the management system for GHSPs should be compatible with the existing national legislations implemented by the Member States, as long as these transpose the provisions of ICAO Annex 19 and the existing industry standards<sup>8</sup> in their national regulatory system.

The high advantage brought about by the new requirements will be the bringing together of today's national requirements into a single set of European requirements, which will provide enough flexibility to recognise what has been built and implemented so far and allow fast transition from the multiple national systems to the European system.

### **2.3.7 Impact on existing organisations including EASA**

The future requirements will directly impact the GHSPs and the competent authorities, and indirectly the aerodrome operators and aircraft operators in Europe.

All aspects described in the previous chapters will increase the safety of GH services in Europe.

## **3 Conclusion**

The Concept Paper proposes to require an integrated management system including SMS for GHSPs.

Such management system, including effective safety management policies and processes, should be a prerequisite for a GHSP to obtain the permission to provide its services at an aerodrome.

The main purpose of this requirement is to build trust in the management systems of each of the parties involved in GH services (GHSP, aerodrome operator, aircraft operators) and improve safety.

This should

- increase the safety and efficiency of the GHSP activities,
- encourage reporting in a just culture environment,
- establish clear reporting lines and address gaps and overlapping responsibilities of the different parties involved in the GH activities,

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<sup>8</sup> IATA standards for ground operations (ISAGO) and IBAC standards for ground handling operations (IS-BAH).



- enable swift exchange of safety-relevant information (e.g. occurrence reports, best practices),
- allow for the alignment of the GHSPs' safety procedures. This must be driven by the context of the operation – aerodrome specificity, type, size, and complexity of the GH activity, etc.

It is recognised that the introduction of processes for hazard identification and risk assessment, mitigation and verification of the effectiveness of such mitigation actions will create immediate and direct costs, while related benefits are sometimes intangible, and may take time to materialise. Over time, an effective management system will not only address the risks of major occurrences, but will also identify and address production inefficiencies, improve communication, foster a better organisational culture, and lead to more effective control of contractors and suppliers. In addition, through an improved relationship with the authority, an effective management system may result in a reduced oversight burden.

Ultimately, a European aviation safety framework including GH will put GHSPs and the many professionals in GH on the European safety map. This will have a significant positive safety impact by adding another major stakeholder group to the European aviation safety chain, in line with the total system approach. This bears significant potential to add relevant safety information to existing safety information networks.



## 4 References

- REGULATION (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91.
- Council Directive 96/67/EC of 15 October 1996 on access to the groundhandling market at Community airports. See the Annex to the Directive for the list of GH activities.
- Commission Regulation (EU) No 139/2014 laying down requirements and administrative procedures related to aerodromes pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council (see ADR.OR.D.025, ADR.OR.D.030 and related EASA AMC and GM).
- Commission Regulation (EU) No 965/2012 of 5 October 2012 laying down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council (see ORO.GEN.205 and related EASA AMC and GM).
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