



European Union Aviation Safety Agency

CONCEPT PAPER¹

GROUNDHANDLING ROADMAP

Ground Support Equipment

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 indicated that a common approach could contribute safer and more efficient services. 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, 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).

Currently the EU's aviation safety regulation does not address directly how GSE should be properly maintained and used in accordance with the manufacturer's specifications. Although industry standards concerning technical and functional specifications for GSE exist, adherence to such standard is voluntary or imposed at national or local level. Already now many groundhandling service providers (GHSPs) follow a suitable maintenance programme, however, there is no assurance that the performance throughout EU is optimal due to the lack of an EU regulatory framework.

This concept paper includes a brief analysis of the current situation in Europe. It also describes the shortcomings that have been identified by the different stakeholders, which would remain unresolved if the EU regulator does not propose any actions.

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 any regulatory action concerning GSE is to:

- improve the safety of GH operations by reducing the number of aircraft damages caused by poorly maintained GSE;
- reduce the acquisition / leasing cost for GSE by extending their service life through maintenance and promoting the use of GSE in accordance with instructions; and
- create a more level playing field for GHSPs as far as GSE maintenance is concerned.



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1 Background

2 Description of the issue

Groundhandling (GH) services are provided using ground support equipment (GSE) in combination with fixed aerodrome infrastructure, where available. Properly functioning, appropriate for the task and fit-for-purpose equipment is essential for the smooth and safe delivery of the service and the safety of staff operating the equipment or working around the aircraft.

GSE has to follow Directive 2006/42/EC as transposed in the national regulatory framework of the Member States and is also subject to EN 1915 and EN 12312. These are, however, not linked to aviation safety regulations. The elements of the directive and ENs are addressed either at national level or even at local level. Normally, the aerodrome operator assesses compliance during the tendering process for giving access rights to Groundhandling service providers (GHSPs).

The absence of common standards has a high potential to create an uneven playing field. In particular because the acquisition/leasing and maintenance of GSE represents an important financial investment for GHSPs in a highly competitive GH market.

2.1 Identification of the issue

Servicing of aircraft on the ground involves the use of different type of equipment such as mobile stairs, mobile ground power units, belt loaders, passenger busses, etc. The majority of them are operating very close to or even come in contact with the aircraft. Incident reports involving aircraft damages and staff injuries mention aspects such as:

- poor maintenance of the equipment;
- the use of an equipment which is not fit for the purpose;
- the use of an equipment outside the scope of tasks it is designed for; and
- non-compliance with the user instructions for the GSE.

A programme that ensures the proper functioning and use of GSE without putting excessive financial burden on the GHSPs is hence important to avoid staff injuries and damage to aircraft. Such system should enable the use of innovative technologies as well as technologies that have less impact to the environment.

2.2 Identification of the possible ways forward

The following actions are proposed for a way forward:

1. Develop the skeleton for a programme to ensure that GSE is properly maintained, appropriate for the task and fit-for-purpose. This should include:
 - a. a requirement to put in place a maintenance programme;
 - b. a recommendation to use manufacturers' instructions and industry standards to ensure that GSE is fit-for-purpose and used within the scope of tasks it is designed for; and
 - c. instruments to ensure effective implementation at local level.
2. Ensure that staff responsible for GSE maintenance are trained and competent to execute their tasks.
3. Support the development of industry standards that promote innovation and are environmentally friendly, by promoting technology neutral rules.
4. Enable the implementation of cost and space efficiency programmes such as equipment pooling at aerodromes.



2.3 Analysis of impacts for the possible options

2.3.1 Safety impact

A well-maintained and fit-for-purpose GSE is less likely to contribute to aircraft damages or staff injuries. This, in combination with appropriately trained GH staff will have a positive safety impact.

2.3.2 Environmental impact

A well-maintained GSE would normally have less emissions, decreasing in this way the environmental footprint of the aerodrome. Support for the introduction of new technologies, such as electric vehicles, will also have a positive effect on the environment.

2.3.3 Social impact

The confidence that GSE is well-maintained will allow staff to concentrate on their core tasks. This will help also reducing extra work that might be caused by poorly maintained GSE. Equipment related staff injuries will decrease and working conditions will improve. Additionally, the introduction of more sophisticated and technologically advanced GSE is expected to expand the competencies of the staff operating and maintaining the GSE.

2.3.4 Economic impact

The maintenance of GSE to keep it fit-for-purpose requires financial investments, human resources and facilities. For those GHSP who have not been following a maintenance programme, the initial investment may be high. On the other hand, a well maintained GSE has longer service life, is less prone to accidents and staff injuries and consequently reduced insurance costs and social contributions due to occupational accidents. Considering all these it is more likely that the economic impact would be positive.

2.3.5 Proportionality issues

None.

2.3.6 Impact on regulatory coordination and harmonisation

The lack of a common standards for GSE equipment undermines the level playing field and puts a financial burden to GHSPs who are obliged to follow stricter requirements imposed by national regulations or the aerodrome operators. The objective to pursue the use of EU widely accepted standards will have a positive impact on harmonization with consequential positive safety and economic impacts.

2.3.7 Impact on existing organisations including the Agency

The impact is expected to be minimal since the majority of organisations have already in place a maintenance programme

3 Conclusion

The Concept Paper proposes to develop a system to ensure that GSE is properly maintained, fit-for-purpose and correctly operated. This can be achieved by:

- creating a framework for robust maintenance programmes for GSE
- promoting the use of accepted industry standards for GSE
- ensuring that GSE maintenance staff and GSE operators are properly trained.

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



- The level of safety in ground operations will improve by reducing the number of aircraft damages caused by poorly maintained GSE.
- The cost of acquiring/leasing new GSE will be reduced by extending their service life.
- A more level playing field for GHSPs will be created.

