

Questions and Answers

Questions and answers from the EASA GH Conference of 7 March 2019

Disclaimer:

The answers provided represent the opinion of the speakers from the GH Conference. EASA contributed to some of the answers with explanations and points of view that were valid at the time of the conference, before the beginning of the rulemaking task or safety promotion dedicated to groundhandling.

MANAGEMENT SYSTEM

- 1. Q: When are we able to see regulatory changes where EASA accepts pool (ISAGO, ISBAH) audits as an acceptable means of oversight for airlines?**

A: EASA intends to use as a model the existing rules in the Air Operations regulation (EU 965/2012) and its AMC and GM, which enable the use of industry standards.

The industry standards will not be included in the future GH regulation, but the new rules as well as further safety promotion activities initiated by EASA will facilitate their recognition by the competent authorities and by other auditing organisations.

One clarification: the IS-BAH audit is not a pool audit; each individual station seeking registration with IS-BAH is required to go through an audit to receive registration approval.

- 2. Q: 44% of the passengers are traveling on low cost, IATA have intention to connect with the low in order to join forces toward a standard approach to safety?**

A1: An effective management system should deal with the identified risks while assessing the complexity of the operation.

A2: The IATA standards and safety programs are not confined to a single business model – they can be directly applied by any airline and/or ground service providers or airport. The IATA industry safety solutions shall be implemented as performance-based requirements that focus on desired, measurable outcomes, rather than prescriptive processes, techniques, or procedures, as such they can fit to any type of safe operations.

- 3. Q: If ISAGO is “one single means of compliance”, it doesn’t mean that an airline can provide additional oversight of its GSP. Correct?**

A1: ISAGO is an audit based on the IATA standards. IATA is not a regulatory body. It also cannot take on the risk from an air operator or a GHSP.

The existing requirement in Regulation (EU) No 965/2012 on air operations concerning contracted services (ORO.GEN.205) continues to apply. This means that the management system and the compliance monitoring of an air operator should incorporate the activities of the GHSP.

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A2: Although ISAGO could be accepted as "one means of compliance" out of more acceptable or alternative means of compliance, an airline as the holder of an AOC will still arrange for additional oversight, as it is held responsible for the contracted services provided by a GHSP. However, that oversight is expected to be reduced once the new rules will enable recognition of worldwide used industry standards.

4. Q: Aerodromes' & Airlines' SMS are different. Will GH have specific requirements vs linked to existing regulations (GSP already being under airlines' SMS through Air Ops)?

A: The new rules will establish the elements of an interface that are intended to allow the SMSs of the air operators, the aerodrome operator and the GHSP to communicate and establish common elements, thus preventing overlapping tasks. There will be a separate new regulation for GHSP, and the existing requirements related to GHSP in the current regulations on air operations and aerodromes will be adjusted accordingly.

5. Q: Why not create the discussed system as an international standard through a recognized standardization organization? The competence is in the industry.

A1: In an ideal world this would be preferred but we can only deal with the EASA Member States directly and so that should be treated as a possible step towards that.

A2: Moreover, the purpose of the Manual on Groundhandling put together by ICAO's GH Task Force is to be used as 'accepted industry good practice and represents a proven way of doing this'. As there cannot be a single industry standard to fit all purposes, the principles therein should rather guide the creation of standards and good practices to be safe and widely accepted.

6. Q: GHSP are required to follow airline procedures, sometimes these add unnecessary complexity and safety risk to a GHSP operation. What is the view of EASA on it?

A: Currently this is happening because the air operator is responsible for the contracted services provided by a GSP before their CAA (see Reg. (EU) No 965/2012 on air operations, ORO.GEN.205). With the EASA Groundhandling roadmap and the future regulation, the intention is to ensure that the procedures will be commonly agreed by the air operator and the GHSP from an equal position and will address the safety risk in the most effective way. This should reduce the operational risk in the ground services.

7. Q: In ISAGO, there are many standards demands the procedure "as per airline standards". How can an airline confirm whether the GSP actually included it or not?

A1: The air operator should be assessing their operations through audits of their contracted activities as part of their compliance monitoring process.

A2: An airline can only confirm it by means of audits and/or inspections. Eventually, certain standard procedures could be harmonized to reduce the "as per airline standards" procedures to a minimum.

8. Q: If ISAGO is accepted AMC this alleviates the cost burden on operators by lowering or reducing their oversight, the cost is on GH only. How shall this be levelled?

A1: ISAGO will not become an AMC. While it can be considered as good practice, it cannot be included in the rules. EASA intends to use as a model the existing rules in the Air Operations regulation ((EU) No 965/2012) and its AMC and GM, which enable the use of industry standards.

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A2: EASA will not impose any industry standard through a regulation or an AMC, nor will it favour one industry standard over others. However, the new rules will enable the use of internationally recognised industry standards such as ISAGO, IS-BAH or ISO by GHSP and self-service aircraft operators. The new rules will also facilitate recognition of industry standards by competent authorities and other auditing organisations. This will also be developed through safety promotion activities by EASA. The EU system preserves and applies the principles of fair competition and level playing field. However, it is outside the EASA remit to propose any rules to regulate the market.

9. Q: Can or should the different GHSP audit programs be aligned with airport operator and/or CAA requirements?

A: Yes, to a certain extent. This is included in the GH Roadmap under the creation of an interface between the organisations involved in the GH services.

10. Q: Regarding the exchange of safety data, a common platform/software is going to be created to report, to access to the investigations, actions taken..?

A: The intention is to create a common platform where safety relevant information and data can be accessed by all organisations concerned.

11. Q: If EASA in scope of regulatory control activities will audit handlers and have the scope of ISAGO, will IATA recognise results of authority check?

A1: As an Authority, it is not within our umbrella to consider whether or not IATA wishes to "recognise" our work.

A2: As per the new provisions of the Basic Regulation (EU 2018/1139), EASA will not be the competent authority of GHSP, therefore EASA will not perform a direct audit to the GHSPs; the national aviation authority (NAA) of the Member State where the aerodrome is located will be the competent authority of the GHSP operating on that aerodrome. Moreover, it should be clarified that the results of inspections performed by a competent authority to a GHSP as part of its oversight activity do not need any recognition by IATA or similar organisations. At the same time, the results of such inspections will not be shared by the competent authority with any external organisation outside the provisions of the applicable laws.

OPERATIONAL STANDARDS

1. Q: EASA states GHSP shall follow Airlines standards. This adds complexity and may increase risk for a GHSP. How will EASA address this and transfer responsibility?

A: In Annex VII, point 4.1.(c) of Regulation (EU) No 2018/1139 it is stated that the provider shall provide the groundhandling services in accordance with the procedures and instructions of the aircraft operator it serves. The Agency acknowledges that this adds complexity and may increase operational risk, however it is still premature to state how this will be resolved. The approach taken will aim at enabling the aircraft operator and the GHSP to agree together on common operational standards and procedures, whichever prove to be more effective for risk mitigation.

Questions and Answers

- 2. Q: Is there any data to support the idea that complexity, as opposed to complacency, has led to increased safety incidents?**

A: Although the Agency has data on incidents/accidents during the provision of groundhandling services, there is no analysis to prove that they are caused due to complexity compared with complacency.

- 3. Q: Why is EASA better suited to make and maintain standards than recognized standardization organizations when competence is within the industry?**

A: The role of the Agency and its responsibilities are described in Regulation (EU) No 2018/1139. The Agency has its well-established mechanisms to make and maintain standards ensuring the participation of the affected stakeholders as well as the opportunity of every person to provide comments during the consultation process.

- 4. Q: Did EASA perform any assessment/inspection of the effectiveness of quality standardisation programs like ISAGO or IS-BAH confirming equivalent level of safety?**

A: No, as the groundhandling domain had not been covered by a European safety regulation until the Basic Regulation (EU) 2018/1139, which became applicable in September 2018. Moreover, an 'equivalent level of safety' needs to be measured against a set standard, which does not exist at the moment, other than the industry standards.

- 5. Q: Could you expand on how, in your opinion, a regulatory standardisation introduced under the NBR should improve cost saving of GSPs and Airlines?**

A: The oversight concept has not been defined yet, therefore we are not in a position to provide more details.

- 6. Q: How will these standard procedures apply outside Europe for EU airlines? What if a Third Country GHSP refuses to apply the EU standards?**

A: The requirements are applicable to GHSP operating at EU aerodromes. For GHSP at aerodromes outside EU, it is always the responsibility of the Air Operator that the GHSP provides the services in accordance with the operator's instructions specified in Regulation (EU) No 965/2012 on air operations and the operator procedures. Both current industry programmes are international in scope and could be used by EU airlines to address risk to services performed outside the EU.

- 7. Q: How do you sanction a GHSP when there is no certificate to potentially revoke? Will national CAAs be allowed to banish a GHSP from an airport? From the country?**

A: A finding during an inspection does not necessarily mean that enforcement measures are taken immediately. As already happening in other aviation domains, depending on the severity of the finding there is a corrective action plan which needs to be established. Further actions may be taken if the provider fails to complete the corrective action plan, which could include de-registration of declaration.

- 8. Q: What happens in Luton if following the "local industry standard" there is damage? Who is responsible?**

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A: There is no change in liabilities. The airline contracts the ground handler, the procedures are agreed locally and implemented. It would be incredibly tricky for the airline to prove that one particular means of coning or chocking an aircraft is better than another.

9. Q: Taking into account a Luton example, will EASA regulation address limits of liability and accountability between different players implementing an ops procedure?

A1: I really don't know as EASA haven't been specific about what the regulation will contain albeit they mentioned, several times, standardisation. I would doubt they would go that far. I would hope that EASA would insist that where an airline contracts a handler that services other airlines that they would agree standard processes and allow the handler to state what those processes should be. Airlines who self-handle can be excluded as the issue that needs to be addressed in the inexplicable variances in handling requirements across airlines for the same aircraft type.

A2: It is too early to give a precise answer to this question at the moment, as this will be determined through the rulemaking process and subject to further consultation. However, the intention is to propose regulatory elements of an interface between the organisations involved in applying the GH operational procedures. The purpose of such interface will be to set clear limitations and lines of responsibilities in order to avoid duplications or contradictions in applying the procedures.

10. Q: Will the new GH regulatory requirements influence or affect the perceived "race to the bottom" a.k.a a highly competitive market?

A: The objective of the regulatory requirements are to ensure a high level of safety and level playing field.

TRAINING

1. Q: Which entity defines the "correct" attitude? In many areas the right attitude is a "political" issue.

A: We should look at observable behaviours as these can be directly linked back against the training (knowledge and skills) delivered, so making an observation can determine if the behaviours (actions) are as expected. So avoiding the political issue around an attitude being correct or not correct, which is very subjective and we should only assess against the objective.

Questions and Answers

GROUND SUPPORT EQUIPMENT (GSE)

1. Q: Do all GSE manufacturers provide training on the equipment's they are providing?

A: The majority do offer some form of training but the standard and content are variable.

2. Q: Could we modify the GSE supplier requirements based on risk analysis and experience (example: oil exchanged from every year to every two years)?

A1: Yes. The customer requirement is key here. If GSE is still under warranty then the risk of equipment failure (and cost) resides with the customer if the maintenance regime is not followed. If GSE is out of warranty, then the customer has the right to decide how to maintain the GSE as long as safety and legislative requirements are not compromised. Oil Health Monitoring (OHM) for example may (and always does) reduce the frequency of oil changes based on condition monitoring and sampling of the oil.

A2: Nothing stops the user and the supplier from developing a custom maintenance regime to suit specific operating conditions and circumstances within whatever applicable safety and legislative requirements are in force.

With respect to retrofitting, there are several instances where a piece of GSE is retrofitted to enable further functionalities (e.g. proximity sensors, cut-off system, speed limitation etc.).

3. Q: What is the relationship (if any) between this EU work and AHM CHAPTER 9?

A1: The relationship is the vision to create a policy to govern how GSE maintenance is delivered; create a standard, which is currently absent. The overall intent is to provide consistently safe and reliable GSE to a standard in order to reduce accidents and injuries as the result of malfunctioning and poorly maintained GSE.

A2: The IATA AHM gives some basic overall requirements as well as Requirement Specifications for a wide range of GSE. These cover aspects such as what should be standard equipment, what options could be available, guidelines of certain aspects that need attention or particular caution. These requirement specifications are intended to be read in conjunction with other applicable standards such as EU Norms, as well as applicable ISO, SAE and other applicable standards or rules that might be in force in certain countries or specific airports. The AHM covers much more than maintenance.

IATA AHM 917 – Basic Minimum Preventative Maintenance Program / Schedule is specifically provided for use in situations where there is no longer any OEM maintenance material available. It is very general but attempts to cover the basic requirements to keep GSE operating safely. However, it cannot in any way guarantee there will not be breakdowns / failures as that depends on too many variables outside the control of the authors.

4. Q: Will EASA provide guidance material on the main elements of a GSE maintenance programme?

A1: The Agency will establish the requirements of a GSE maintenance programme. It is envisaged that the requirements will describe at least the basic principles of the maintenance programme, however it is premature to enter into details at this stage.

A2: Please see IATA AHM 917 and the AHM 908 – GSE Maintenance Training Program.

5. Q: How do you deal with subcontracted maintenance?

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A: Good question. It is my view that third party maintenance provider and sub-contractors should maintain GSE to the standard agreed by the Customer. This should form part of the T&C's. There should be one standard for the ramp.

6. Q: Is there a role for some of the Japanese continuous improvement tools such as kaizen or 5S to achieve improvements?

A: Absolutely, starting with some of basics such as 6S: **S**ort, **S**traighten, **S**hine, **S**tandardize, **S**ustain, **S**afety

7. Q: GSE should be provided as standard, closed baggage, forklifts with tow hooks... speed limit.... etc., to prevent unsafe operation.

A: Agreed. Swissport International Ltd. has created a GSE Fleet Catalogue that standardises the build standard globally that all the GSE manufacturers now understand.

8. Q: Who will decide what standards to follow? Groundhandling equipment in Asia meeting Asian standards are much more affordable than European made.

A1: There should be a minimum standard that is designed to deliver safe and compliant GSE, similar to the EC commercial directive (96/67/EC). Within Europe this should not be too problematic. Across the globe, similar standards should be applied as a minimum industry standard.

A2: Standards are mandated by country, local regulations and/or airport – there can be quite a variety of differences. Other requirements / options are within the domain of the customer and manufacturer.

9. Q: Will EASA propose a minimum training requirement for GSE technicians? If yes will it be based on specific GSE?

A1: Good question. Swissport is working with IATA to develop GSE workshop manager and technician technical training framework that provides the basis for GSP's to develop specific training requirements. This replicates the IATA/ISAGO requirements for training for RAMP operators.

A2: EASA cannot answer this question at this moment. While the GH Roadmap includes actions on developing minimum training requirements for GH specific functions, the focus group providing support to the future GH requirements will have to assess this need and propose whether minimum training requirements for GSE technicians need to be developed. The group of experts will also have to assess whether the new rules have to be so specific as to develop training requirements or training programmes based on the equipment type or rather enable the use of existing industry standards in this area.

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OVERSIGHT

1. Q: Will airlines be required to increase current levels of oversight on Groundhandling Service Providers?

A1: I do not foresee why airlines would need to increase oversight if the oversight they currently do satisfies their Management System.

A2: That is not the intention, even the audits from the airlines could be reduced just because the system will be more confidence when GHSP will be under the oversight of the NAAs

A3: According to EASA OPS 965/2012 – ORO.GEN.205, aircraft operators have the responsibility to monitor their contractors. There is no foreseen change for this regulation.

2. Q: GSE standards do exist but are typically only available at a cost: i.e. SAE, IATA. So, if used as good practice, how will they be made available to all?

A: Most GHSPs have GSE manufacturer standards in place or use industry best practices. It is not the aim of the upcoming regulation to impose any new standards that are not compliant with these above-mentioned standards.

3. Q: Airports have mixed users, small and big. How to ensure that one size of a system must not be offered to all users. Small users cannot pay for big user's capacity.

A1: If this is relating to a Management System, then a MS is designed by the parties using it. So you decide the hazard identification, risk assessment (HIRAs), the level of audits, etc. It becomes of appropriate size as you design it to ensure it is not too cumbersome and therefore not an effective management system.

A2: It is intended to have a scalability in the requirements in the regulation for solving this inconvenience.

A3: As described in the concept paper 'Groundhandling roadmap – Oversight of Groundhandling Activity', the NAA oversight activity must be scalable and proportionate to the size and complexity of the GHSP. The same system is already applied by NAA oversight of aircraft operators, aerodromes and other aviation operations.

4. Q: Is a declaration required airport by airport, by country, or by legal entity (eventually multiple in one country or one covering operation cross country borders)?

A1: The New Basic Regulation (EU) 2018/1139 establishes in article 37.2 that GHSPs "shall declare their capability, and the availability to them of the means, to discharge the responsibilities associated with the services provided in compliance with the essential requirements referred to in Article 33", but it hasn't been defined how to do it yet.

A2: As groundhandling operations might differ from one aerodrome to another (even within one Member State), the most efficient way would be for the groundhandling service provider to issue a declaration for each aerodrome it provides for. Please consider that the issuance of a declaration is not work intensive. It is expected that the GHSP declaration will not be unlike the NCC declaration introduced by Reg. (EU) No 800/2013 amending Reg. (EU) No 965/2012 on air operations. Just like operations specifications for an aircraft operator list the aircraft registrations, it would be simple to request a GHSP to list the individual stations included under its declaration.

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A3: EASA cannot answer this question at this moment. The declaration system will have to be developed by the group of experts and subject to consultation within the framework of the GH rulemaking task. The best option in terms of effectiveness and oversight capabilities will be proposed.

5. Q: Management of change: in many occasion people do not report because their perception is: “nothing will change” hence, we should share information on what is for.

A: According to Reg. (EU) No 376/2014 amending Reg. (EU) No 996/2010 on occurrence reporting, the reporting of safety relevant occurrences and incidents is mandatory. Responsible competent authorities can react upon receiving such reports. Currently, as many states do not have a direct GHSP oversight, the possibilities for competent authorities to react or directly intervene are limited. The new Basic Regulation (EU) 2018/1139, which allows for Authorities to have direct oversight over GHSPs, will give Competent Authorities more freedom to investigate groundhandling occurrences and incidents.

6. Q: How to oversee self-handling operations?

A1: No different from a standalone GHSP.

A2: Self-handling operators will be considered as ground handlers in the regulation, so they will be under the scope of the regulation and received oversight country by country provided by NAAs, but coordinated between the NAAs.

7. Q: Is this oversight proposal going to add a scope another audit from NAA to GSP in addition to airline audit?

A1: NAAs should already be overseeing GHSPs through airline contracted activities. No additional audits are foreseen in the Irish CAA Safety Regulation Division, for example.

A2: Yes.

8. Q: Is Spain also considering the IS-BAH Standard in their national regulation?

A1: No, we haven't. We have focused our inspection and standardisation on conventional commercial air transport, avoiding the GA.

A2: The IS-BAH was developed independently by the business and general aviation community. It is aligned with applicable ICAO SARPs (such as SMS), NAA guidance and where there may be some alignment with ISAGO at times, it is aimed to meet the unique needs for the business aviation/general aviation sector.

9. Q: Would EASA expect aerodrome or flight ops from the countries regulator to carry out the GHP audits?

A1: We would expect competent Ground Operations Inspectors with the relevant experience and training required to carry out the inspections. Whether they work for aerodromes or flight ops is an NAA decision. This is a standalone regulation.

A2: It is expected that NAAs will discharge groundhandling oversight activities to personnel most suited to the task. How NAAs are structured might vary from one NAA to another. Certain authorities already have proficient personnel either working for the aerodrome, flight operations or both domains.

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A3: The group of experts will also discuss within the GH rulemaking task the need to develop some training and qualification requirements for NAA inspectors.

10. Q: Has the Spanish program seen steps forward in Safety in Groundhandling?

A: Yes, we have. First of all, we hadn't been receiving occurrences from GHSPs before we conducted oversight and now we are receiving them so we have more information to work with. But most important is that GHSPs are more aware of ground safety, so many improvements have appeared. Also it is important to say that most GHSPs are thankful with the authority oversight, now they have more empowerment in their organisations than before just because they have to meet some authority requirements, the GHSPs invest more resources in safety.

11. Q: It was said that headquarter is oversight in Spain. Do you mean country headquarter or global headquarter? There are some differences.

A: Country headquarters. But we have received procedures for international headquarters and mainly they complied with the requirements just because they are international standards (IATA ones). We had in the past more problems with the SMS requirements because it was not compulsory for ISAGO programme, but nowadays it is mostly solved. However, it is fair to say that SMSs have been adapted to comply with our national Technical instruction, it is a national issue because our standards for SMS are compliant with the ICAO ones but slightly different. With the future EU regulation, we will comply with the EU framework, so we should have no differences.

12. Q: Is it possible to have a centralised Ground Safety Report instead of leaving it to CAA the need to collect from different stakeholders for the same event without merging/agree on it?

A1: This centralised reporting system already exists – please refer to www.aviationreporting.eu. All reports entered into the system will automatically be transferred to the responsible competent authority.

A2: This matter will be considered by EASA during the safety promotion activities.

13. Q: Oversight should only be performed at locations in the Members States where groundhandling activities are performed. Are there any non-EU implications?

A1: Oversight can and will still occur outside of the EU through the contracted activities of the air operators.

A2: If the GHSP's HQ is not located in an EASA Member State, oversight activities could also take place at the GHSPs HQ in a third country. However, there would be no inspections/audits of the services provided in a non-EASA Member State.

14. Q: In Spain, where there are also lots of GA/BA handlers, why is only ISAGO being considered?

A1: Although the GA/BA traffic in Spain is quite extended, it is not so representative comparing with conventional air commercial transport. So we have focused our inspection and standardisation on conventional commercial air transport, avoiding the GA. That's why we haven't considered other standard different from ISAGO.

A2: The IS-BAH was developed independently by the business and general aviation community. It is aligned with applicable ICAO SARPs (such as SMS), NAA guidance and where there may be some alignment with ISAGO at times, it is aimed to meet the unique needs for the business aviation/general aviation sector.

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15. Q: How will EASA oversee a GHSP headquarter management system if this is placed outside EU?

A1: The Management System will only be as good as the stations that operate it and use it, therefore an audit of the effectiveness of the Management System can be done during the oversight of an EU Member State GHSP, even if the Head Office is outside the EU.

A2: Yes, if they provide services in the EU.

A3: The group of experts will need to clarify the provision of GHSP supervision / coordination services and Flight operations and crew administration. The latter may include many providers based outside of the EU that provide services to EU operators both inside and outside of the EU. This answer links to Q18 as well.

However, the oversight will not be performed by EASA, as this is the responsibility of the competent authority of the aerodrome where the groundhandling activity is provided. This is already established in the Basic Regulation (EU) 2018/1139 (Article 62 pt. 4).

16. Q: The inclusion of groundhandling in the Airports is unfortunate. This might mean that the oversight of the NAAs should be limited to the airport-GSP interface?

A1: It is in Aerodromes, but it is a stand-alone regulation. The essential requirements for groundhandling in the Basic Regulation (EU) 2018/1139 are included in Annex VII which, relates to Aerodromes.

A2: However, it should be clarified that the future regulation will be a stand-alone regulation. EASA will approach the groundhandling project horizontally, seeking expert input from both air operations and aerodrome domains, in addition to experts from the GH domain.

A3: The NAA will audit/inspect against specific EU Regulations. It is expected that NAAs will discharge groundhandling oversight activities to personnel most suited to the task. How NAAs are structured might vary from one NAA to another. Certain authorities already have proficient personnel either working for the aerodrome, flight operations or both domains.

17. Q: In Spain is or would ISAGO be considered an alternative means of compliance?

A: It is important to understand that the "requirements" in our technical instructions are mainly based on ISAGO Standards Manual, so they are biased with the industry standard. So our means of compliance are based/biased on IATA standards. Alternative means of compliance can only be developed by GHSPs.

18. Q: Flight Dispatch is not Groundhandling. How will the mistake in the BR be rectified?

A1: Flight Dispatch, in the sense of Mass and Balance, is groundhandling.

A2: In a specific domain such as Flight Dispatch, NAAs might prefer to discharge the oversight of flight dispatch services to its Flight Operations inspectors. The Basic Regulation (EU) 2018/1139 will ensure that flight dispatch services are monitored whether or not the provider is a specialized entity, an aircraft operator or a GHSP.

A3: Flight Dispatch (flight plan) – Mass& Balance (load planning /Loadsheet) these activities are completely different.

A4: Indeed, this is a function that belongs both to GH and to air operations, with some elements being exclusively flight ops-specific (e.g. flight planning), while others, ground ops-specific (e.g. loadsheet, M&B). It should be specified that both the Council Directive 96/67/EC (which is still in effect) and the Basic Regulation ((EU) 2018/1139 list flight dispatch among the other groundhandling activities.

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The encompassing activities covered by the flight dispatcher will have to be defined by the future GH regulation.

19. Q: If a GHSP operates at many locations in the same MS but conducts differing services at a number of different locations, will one declaration still suffice?

A1: In my opinion one declaration will be enough, but I think the declaration should specify the airports where the services are provided and which services are provided at those airports. That could mean for the future that if a GHSP begins new services in one airport, it has to declare them; or even if a GHSP begins services in an airport where the GHSP was not working, should have to declare those services at that airport. Otherwise, it would be impossible for the NAA to establish an oversight programme.

A2: Although no decision with regard to this question can be taken by the EASA expert group at this moment, one option would be that a GHSP issues one declaration per Member State only. Another option would be that the groundhandling service provider would issue a declaration for each aerodrome which it provides for (groundhandling operations might differ from one aerodrome to another – even within one Member State). Please consider that the issuance of a declaration is not work intensive. It is expected that the GHSP declaration will be similar to the NCC declaration introduced by Reg. (EU) No 800/2013 amending Reg. (EU) No 965/2012 on air operations.

A3: This aspect will be discussed and determined by the group of experts within the GH rulemaking task, then proposed to further consultation. In any case, the declaration will be drafted so as to require the list of aerodromes where the GH services are provided as well as the list of GH services provided at each aerodrome.

Questions and Answers

STAFF TURNOVER

- 1. Q: Unnecessary staff turnover is at odds with a safety culture. Could Directive 2001/23/EC on transfer of undertakings be a useful tool to regulate this flaw?**

A: I suspect not. There are jurisdictions with mature transfer of undertakings rules, yet they also experience high or very high levels of turnover. I am personally convinced the answer is with the sector and making it an attractive proposition.

- 2. Q: What about automation to partly address turnover and general unattractiveness of GH?**

A: As mentioned at the conference, the impact of automation below the wing has yet to be fully realised. I do see increasing use of autonomous vehicles, robotics and increasing automation of legacy GSE. Clearly this will reduce the reliance on people - hopefully for work they find unattractive.

- 3. Q: Turnover seems to be a social / human resources issue, as far as staff is well-trained. To what extent does it fall under the scope of the Basic Regulation?**

A: Article 89 of Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 (EASA's 'new' Basic Regulation) requires EASA to take into account the interdependencies between civil aviation safety and socioeconomic factors. Assessing the impact of staff turnover on aviation safety is exactly that.

- 4. Q: Will the GH regulatory requirements influence/affect the perceived "race to the bottom" challenges identified by many? a.k.a a 'highly competitive market'.**

A: We hope not. More stringent requirements to operate at an airport should equal higher quality and potentially an ability to charge a reasonable fee. However, in any open market, there will be businesses which try and gain market share via (often) unrealistic pricing. I am not sure a formal regulatory regime will stop this practice.

- 5. Q: More bureaucracy leads to higher cost. At the end less money for the worker on the apron. How will this increase interest for anyone to seek such a career?**

A: The objective of this task is to increase safety and efficiency by providing a regulatory framework for GH without burdening MSs and industry with disproportionate / inefficient bureaucracy. The decisions on what might be the best intervention strategy for each of the actions will be assessed also with a view of examining if the proposed measures deliver without disproportionate additional administrative burden.

- 6. Q: EASA is not going to regulate human turnaround and the problem turns back into training and culture, why it is set up a sixth topic?**

A1: Stakeholders had highlighted to EASA, during the fact finding phase, staff turnover as an issue. The expert group that supported EASA with the development of the concept papers confirmed this. Experts and EASA agree that there is no solution through rulemaking. Other actions such as e.g. a minimum training standard might help to improve mobility and the prestige of GH jobs.

Questions and Answers

A2: “Job satisfaction is an important requirement to carry out safe operations. Indeed, it promotes concentrated behaviour at work, and thereby safe behaviour. It includes a good physical and mental state during normal working periods, a good contact with colleagues, and an adequate job pressure, which is, amongst others, assured by a sufficient size of the staff. Work should be appreciated in an adequate manner by the employees’ foreman/supervisor as well as by the colleagues. This will promote the job satisfaction, hence safe operations.” (P. 57, Safety Culture Indicators NLR-CR-2010-125, NLR Air Transport Safety Institute, 2010)