

# Proposal to Regulate Ground Handling

## We asked

On the 27 October 2025 the CAA published CAP3183 Ground Handling Regulations Consultation (the 'Consultation'). In the Consultation the CAA set out its proposals for the regulation of ground handling across UK Certified and Licenced aerodromes. The CAA considers that opportunities exist to improve safety and engagement with Ground Handling Service Providers (GHSP) who are currently providing a service at UK aerodromes; with opportunities to improve the cooperation between Airlines, Aerodromes and Ground Handling Service Providers (GHSP).

The consultation sought stakeholder views on the CAA's proposed policy development work, including:

- Whether stakeholders agree with that a regulatory framework for ground handling is needed and the CAA's rational for its introduction of regulations.
- The CAA's preferred regulatory option to regulate ground handling services across UK Certified and Licenced aerodromes
- the introduction of a declaration process for Ground Handling Service Providers
- the proposed approach to regulatory oversight
- the appropriate length of a transition period from the regulations coming into force for GHSP to ensure they are compliant with the proposed regulation.

Stakeholders were also invited to comment on the inclusion of ICAO Standards and Recommended Practices, and to assess the potential safety, financial, operational, security, environmental and equality impacts of the proposals. The consultation closed on the 30<sup>th</sup> January 2026 and this response addresses the summary of the responses received, our views and policy positions.

## You said

We received 44 responses to the consultation from both individuals and organisations. The majority of respondents generally welcomed the introduction of statutory regulation for ground handling and supported the proposed preferred option.

### Future regulatory framework for ground handling

Some of the respondents supporting the introduction of a regulatory framework for ground handling noted that it remains the only major component of the aerodrome ecosystem that is not currently subject to regulation. Stakeholders highlighted that the absence of a

regulatory framework contributes to variations in standards, inconsistent safety performance, and a lack of clear accountability across the sector. From all the responses, 86% of responders agreed with the proposal to regulate ground handling at UK Certified and Licenced aerodromes. Six respondents did not provide us with their feedback on this consultation question, specifically.

Responses were received from several industry trade bodies representing aircraft operators, GHSPs, and aerodrome operators. All apart from one of these respondents supported the introduction of ground handling regulation, with a UK trade industry body representing GHSPs supporting the CAA's proposal to regulate ground handling across all UK Certified and Licenced aerodromes using the declaration process, following a risk-based oversight model. To be effective and proportionate, the framework must align fully with the EASA regulations and recognise existing international standards, avoiding duplication and unnecessary cost. With clear alignment and ongoing industry engagement, the proposals can enhance safety, support investment, and maintain a competitive and efficient ground handling sector.

One trade body did not support this approach and responded stating that no regulatory framework nationally can address the core challenges affecting the industry such as staff shortages, lack of qualified personnel, congestion. The trade body felt that even with regulation, these factors would still be present and the regulation will just add in another level of bureaucracy with no added value. The trade industry believes that the current industry programs in place are sufficient to manage industry safety risks and continuous improvement. The trade industry body also suggested that GHSPs should comply with what is in ICAO Annex 14 and oversight should be passed from the state to aerodrome operators, increasing their responsibilities.

Respondent's feedback is that the regulation needs to clearly define roles and responsibilities of aerodrome operators, aircraft operators and GHSPs, to reduce the overlap of gaps of regulatory oversight which would undermine the objectives of the proposed regulation.

Concerns were raised from small General Aviation (GA) aerodromes, GA pilots, and smaller GHSPs that the proposed regulations should not adopt a 'one size fits all' approach and should be proportionate. Respondents concerns centred around regulatory burdens to low-complexity, low-movement environments which would result in disproportionate cost and administrative pressure that could force small aerodromes to scale back or close. Respondents urged the CAA to adopt a proportionate, risk-based approach.

The CAA has undertaken extensive engagement with ground handling service providers, airlines, airport operators, and representative bodies to encourage voluntary improvements in safety performance such as the Ground Handling Safety Operational Team (GHOST) and industry trade forums. This has included targeted workshops, safety campaigns, sharing of incident data and best practice, and the development of non-statutory guidance.

Despite these efforts, industry-led measures have not resulted in a sustained improvement in safety outcomes. Key indicators, such as the rate of ground damage events, equipment-related incidents, and worker injuries have remained broadly static, and in some cases have shown signs of deterioration. Feedback from operators indicates inconsistent adoption of voluntary standards, varying levels of investment in training and equipment, and limited capability for smaller providers to implement improvements without clear regulatory expectations.

In light of this evidence, the CAA considers that further reliance on voluntary action is unlikely to deliver the level of safety improvement required. A proportionate regulatory intervention is therefore necessary to establish consistent baseline standards, strengthen accountability, and ensure that all operators, regardless of size or business model, meet the minimum requirements needed to protect workers, passengers, and aircraft operations. Introducing a framework that applies to both UK licenced and certified aerodromes will mean that the certified aerodromes are not disproportionately effected by the regulation. Similarly, as set out in the consultation any oversight action, such as sampling of aerodromes, will take into account the size and complexity of the GHSP. The CAA will continue to work closely with industry during implementation to minimise impacts and support compliance.

Respondents from commercial airlines, trade bodies, and GHSPs highlighted the need to maintain alignment with EASA's upcoming ground handling regulations. Many operators work across both the UK and the EU and expressed concern that regulatory divergence would introduce duplicated training, parallel audit regimes, and increased compliance costs. Respondents recommended full adoption of EASA regulations, AMC, and GM, and emphasised the need for clear recognition of ISAGO as an accepted means of compliance.

### **Future relationship with the CAA**

The consultation set out the three options of our policy development work, on how GHSPs would notify us of their ground handling operations at UK aerodromes. The three options that were consulted on would be to remain as is today; GHSPs apply for a licence with the CAA; or GHSPs submit a declaration, confirming their compliance to the ground handling regulations.

Out of the three options, the declaration option was the preferred option with 79% of respondents. Most ground handlers and airports favour a declaration-based approach for its reduced administrative impact and practicality. Some respondents expressed preference for a licensing model as it could work better in the long term, as they argued that declarations alone may be insufficiently robust.

The CAA considers that the declaration option would not impact the commercial or operational running of the GHSPs business, and there will be a minimal administrative burden on organisations during the transition period. We have acknowledged the feedback in respect to the robustness of a licence regime; however we maintain that option three

provides sufficient oversight. The declaration model will provide a framework under which the CAA can monitor compliance, issue findings and take enforcement such as limiting, suspending or revoking and organisations declaration.

The CAA commissioned work in January 2025 on reviewing the options available for future regulatory oversight of GHSPs and the consultation provided the three options that were considered during our policy development work. The consultation set out the options considered which were use of existing oversight; full oversight at each aerodrome; or a risk based approach to oversight. The CAA's preferred option using a risk-based approach was agreed by 86% of respondents.

Aerodrome operators and GHSPs that responded to the consultation raised concerns about whether the CAA has sufficient competent inspector capacity and expertise to provide meaningful oversight across the entire sector. Respondents also raised concerns of the risk of overlapping audits between CAA departments, aircraft operators, and aerodromes unless the framework is carefully coordinated. Respondents asked the CAA to clarify the roles and responsibilities of each oversight body and ensure consistent audit standards. Some respondents suggested that oversight should be delegated to GHSPs or aerodromes. This approach would **not** meet the policy objectives in ensuring oversight is applied consistently and proportionately, nor would it provide sufficient assurance that safety performance would be improved across the sector.

### **Transition period to future ground handling regulation**

The consultation outlined the CAA's proposal to have a transition period of 3 years from the date of the regulations coming into force which would allow for organisations in scope to ensure they are compliant. We asked for feedback as to whether or not the period of 3 years is reasonable. The transition period of three years was supported by 80% of all respondents but respondents advised that clarification on the transition period is needed. Several respondents asked the CAA to clarify and provide structure on how the transition period will work; and to consider giving priority to higher risk areas such as SMS, training and reporting; and whether the transition period provides the opportunity for early industry engagement to include oversight and mandatory reporting. Some respondents saying the three years is longer than some organisations will require.

The CAA understands the feedback raised, and we recognise that some organisations will take less time than the 3 years proposed. The purpose of the transition period will be to provide organisations with a defined and proportionate timeframe to implement changes arising from the new ground handling regulatory requirements. It will enable organisations to update systems, processes, training, and assurance arrangements to support an effective and sustainable compliance. The transition period also allows the CAA to monitor readiness across the sector and address any emerging issues before full enforcement begins. By

adopting a transitional approach, the transition period helps maintain safety, operational continuity, and regulatory certainty while facilitating the successful introduction of the revised regulatory framework.

### Specific Comments

We asked respondents for their view of the proposal in respect of safety, efficiency, finance security, the environment and equality. We have summarised the comments regarding each below.

#### **Safety**

Most stakeholders believe regulation can deliver meaningful safety improvements through better training, continuous improvement, strengthened SMS, and clearer accountabilities. Respondents agreed that the regulation will allow for greater collaboration, and continuous improvement in aerodrome safety and must complement existing aerodrome regulations. Some respondents believe that regulation will enable the industry to improve standardisation of ground handling practices and the ability to agree a set of common taxonomies to address safety issues such as aircraft damage. Respondents also reacted positively to the regulation creating a level playing field which would ensure that improvements come from aligned standards rather than inconsistent local variations and expectations. The ground handling regulations would build on the work already undertaken by industry to date.

Several respondents argued that the root causes of ground damage and safety incidents are staffing shortages, operational time pressure, and environmental constraints, not a lack of existing procedures. They cautioned that regulation will not address these systemic issues on its own.

The impact of the regulation will depend on how quickly and effectively safety findings and observations are addressed, which is critical to realising the safety benefits of the proposal.

#### **Efficiency**

Efficiency impacts were generally described as neutral or mixed. Most respondents expected short-term reductions due to increased oversight, but possible longer-term gains from standardisation.

The proposal is likely to deliver operational efficiencies across the sector by standardising procedures and improving staff competence.

#### **Financial**

The introduction of improved training standards and clearer accountability under the CAA's ground handling regulations is also likely to bring financial benefits. Enhanced staff competence and a stronger safety culture will reduce the frequency and severity of ground handling incidents, which are often expensive due to aircraft damage, delays, and associated

insurance claims. Aerodrome operators responded with no additional costs foreseen for them, but recognised some GHSPs that do not have an SMS may have initial financial costs to ensure that they are compliant with the regulation. Some GHSPs responded that as they already comply with industry programs, they do not foresee any additional costs.

Additional cost with more time and resources to be required with maintaining the manuals and licences. Proposal will increase the costs for ground handling to general aviation operators, and would like the proposal to include price transparency to prevent excessive charges. Concern from smaller GHSPs that the regulation could add additional financial burden to the industry that is already operating narrow margins.

GA respondents, small operators, and some airlines raised concerns about cost escalation. Existing monopolies at certain airports were frequently noted, with many GA respondents highlighting mandatory handling fees they consider excessive. GHSPs raised concerns that the sector operates on thin margins and that additional regulatory burden may further strain financial viability. Some large GHSPs also noted that too many handlers operating at a single airport reduces efficiency and undermines safety investment.

## **Security**

Many respondents noted that the regulation will have a negligible impact to aviation security.

Aviation security should not be adversely affected and may be marginally improved where the proposal strengthens role clarity and improved through procedural alignment. Regulation will increase scrutiny of contracts and agreements with GHSP to ensure compliance with both safety and security expectations. The benefits of an enhanced management system should be most apparent. The regulation has the potential to deliver a positive impact on security, particularly if elements of a Security Management System (SeMS) are incorporated alongside the SMS expectations already reflected in the ICAO State Letter.

Additional staff that may be required to ensure compliance with the regulation, or any additional training, vetting or competency requirements could exacerbate existing recruitment and retention challenges in the ground handling workforce.

## **Environmental**

Respondents advised that the regulation would offer improved training, efficiency, and procedural consistency that could lead to indirect environmental benefits, such as reduced fuel burn during ground operations, fewer equipment movements, and less waste from operational errors. Encouraging safer and more efficient handling practices, the proposal may support the wider industry goal of reducing emissions and promoting sustainable ground operations without introducing any significant new environmental risks. Possibility to lower GSE emissions from maintenance standards.

Respondents did not state with comments any negative feedback, all remaining feedback was that the regulation would have a negligible impact.

### **Equality**

Respondents considered that the equality impact would be minimal.

## **We did**

Following the Consultation on the proposal to regulate ground handling, the Civil Aviation Authority (CAA) has carefully considered all feedback received. We are grateful to the 44 individuals and organisations who responded, and we acknowledge the range of views expressed. In line with Government principles, the CAA consults on matters that include changes to legislation and policy. This was a valuable opportunity to seek views and participation from interested parties. We appreciate the feedback on the proposed amendments and have considered the responses and comments.

### **Future regulatory framework for ground handling**

The feedback received from respondents regarding the declaration process was outlined as the preferred option. We acknowledge the concerns raised by some respondents on what enforcement options the CAA will have compared to other disciplines that are issued certificates or licences. During our policy development work, we were aware of the challenges both industry and ourselves would come across on introducing regulation to ground handling on organisations already delivering the services, and we explored the options of licencing or declaration. It was determined that the enforcement regime under the declarations options is robust, with the availability of actions such as limiting, suspending or revoking an organisation's declaration. For those reasons, the declaration framework is suitable for the ground handling regulation.

A key theme from respondents was the alignment to the EASA regulations on ground handling, due to the nature of the industry with many organisations having operations both in the UK and across Europe. We recognise the importance to organisations and individuals who responded to the consultation, and the impact that any divergence between both regulations may have on industry. Throughout our policy development work, our priority has been to ensure that our proposed regulations align with the with ICAO Standards and Recommended Practices (SARPS), essential for uniform global operations. As our policy development work continues, we do accept that a level of divergence may arise between the UK and EASA ground handling regulations. We will be consulting with industry stakeholders on the proposed detailed ground handling technical requirements. This consultation will provide industry with an opportunity to share their views, practical insights, and feedback to help inform the final requirements.

## **Future relationship with the CAA**

Respondents, whilst agreeing with our preferred oversight option, provided us with feedback, related to the potential overlap of our oversight program, ensuring that we have sufficient and competent inspectors, to be able to deliver a risk based proportionate program. We have ensured that the policy development work leading up to the consultation reviewed what organisations across UK aerodromes are delivering what ground handling services. We have carefully evaluated and assessed the complexity and will be able to develop an oversight program that we believe will be fair, proportionate and risk based.

During the development work, we recognised that we would need additional inspectors and competence to ensure that the oversight program can be delivered and be effective. We valued the feedback received about the option of the CAA delegating its oversight to aerodrome operators. We consider that the proposed regulatory framework should be incorporated within the Air Navigation order and enforced by the CAA. UK Aerodrome Operators already have a degree of oversight pursuant to UK Regulation (EU) 139/2014 Aerodromes to ensure that third party operators meet their local requirements and that they have a third party oversight program in place.

## **Transition period to future ground handling regulation**

We recognise the challenges that the introduction of regulating GHSPs that are and have been providing services at UK aerodromes. To mitigate and assist industry on becoming compliant with future regulations, it is important that the industry has reasonable time to transition. Based on the feedback received from this consultation, the 3-year period for transition has been acknowledged by respondents as the preferred option. The transition period will allow the CAA and the industry to ensure readiness for regulation and address any emerging issues before full enforcement begins.

We will, prior to the regulation being in force, release guidance information as to what the transition period will contain, so that GHSPs, aerodromes and aircraft operators are fully aware of the transition milestones

## **Conclusion**

The development of the ground handling regulations will include consideration of whether and, if so, how to:

- Recognise the need to ensure clear and concise information on which organisations and ground handling activity will be impacted by the ground handling regulations.
- Ensure to clearly define roles and responsibilities between aircraft operators, GHSPs and aerodrome operators to ensure the regulations meet their objectives.
- Ensure that the regulation will be risk based, will be fair and proportionate.
- Recognise the importance to align where possible with EASA regulations to reduce regulatory complexity and administration burden on GHSPs, aircraft operators and

aerodrome operators. We will be consulting further on the organisational requirements which will be contained within a Technical Document, for industry to provide feedback.

- Establish an oversight program is carefully co-ordinated with other oversight programs to reduce the likelihood of oversight overlap.
- We are also working to ensure that our Memorandum of Understanding (MoU) with other regulators that GHSPs, aerodrome operators and aircraft operators need to comply with are updated, such as the Health and Safety Executive (HSE).
- Publish clear guidance on how the transition period will work for all impacted organisations setting clear and understood milestones with defined roles and responsibilities for all impacted organisations.

The CAA is committed to maintaining high standards of safety while exercising its functions as the independent aviation regulation and will ensure that it has the necessary expertise and resources to assess exemption applications rigorously and consistently.

In summary, while we are proceeding with the proposed regulation to ground handling, we are doing so with clear commitment to responsible implementation. The accompanying policy will reflect the perspectives shared during the consultation.