

Consultation on Ground Handling Regulations

CAP 3183

Published by the Civil Aviation Authority, 2025

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Executive Summary

Ground Handling is currently one of the few remaining industry sectors which remains largely unregulated and currently we conduct limited oversight through existing regulations; Aerodrome Operations UK(EU)139/2014 and Air Operations UK(EU)965/2012.

The ground handling industry is complex and ground handling services can be provided by an airline for its own operation (self-handling), an aerodrome operator, independent handling companies. Ground handling typically covers all elements involved with the 'turnaround' of an aircraft.

The ground handling sector is a significant and critical part of the growing aviation industry. There has been a noticeable increase in third-party ground handling companies, many with a mix of permanent, seasonal, and short-term airport workers. This together with airport congestion, fast aircraft turnarounds and space constraints has led to ground operations on airport aprons becoming increasingly complex and potentially hazardous.

Ground handling is currently reflected in CAA's top ten risks under 'inappropriately managed contracted activities leading to a reduction in safety performance'. It would be prudent to carry out the safety analysis of ground handling prior to the ICAO effective date, this would provide a good indication of the scale of the potential oversight requirements.

Chapter 1

Introduction

Why are we consulting?

- 1.1 The CAA believes that opportunities exist to improve safety and engagement with Ground Handling Service Providers (GHSP) who are currently providing a service at UK Certified and Licenced aerodromes; with opportunities to improve the cooperation between Airlines, Aerodromes and Ground Handling Service Providers (GHSP). We have identified a number of issues including:
- A limited statutory framework for the safe provision of ground handling services at UK aerodromes;
 - The CAA currently has limited regulatory oversight of Ground Handling Service Providers at UK aerodromes;
 - The CAA has limited regulatory influence on the safety performance of Ground Handling Service Providers and
 - The ground handling industry has finite involvement in the development of the CAA's response to ICAO State Letter consultations and other international work that may affect UK industry.

Why are we consulting now?

- 1.2 There has been growing concern that lack of safety regulation continues to result in injuries and deaths to airport workers and damage to aircraft and airport infrastructure.
- The ground handling sector is not subject to the level of regulation as seen in other domains such as air traffic control, aerodromes, and flight operations. There is currently no direct regulations and regulatory oversight of organisations providing ground handling services at UK Certified and Licensed aerodromes.
- Given the global regulatory changes to ground handling, the CAA believes that now is the right time to consult with industry.

Ground Handling Policy Development

- 1.2.1 The work of the Ground Handling Task Force (GHTF) of the ICAO Aerodrome Design and Operations Panel (ADOP) has sourced a considerable amount of accident/incident data from States (including the UK), IATA, Airports Council international and the Airports Services Association (GH industry body) indicating that a significant issues with increasing safety reports relating to staff

injuries, damage to aerodrome infrastructure and aircraft damage, potentially leading to inefficiencies, safety risks potentially leading to higher insurance premiums and operating costs.

- 1.2.2 ICAO ADOP developed a Ground Handling Services Manual (DOC 10121) in late 2019 and this work was led by the UK CAA. ADOP and the GHTF has developed proposed Standards and Recommended Practices (SARPs) to complement the Manual.
- 1.2.3 Phase one of the proposed requirements was presented to and agreed by the ADOP Panel in February 2022 with an anticipated effective date of July 2024 and applicable November 2026 with a second phase of provisions effective July 2026 and applicable November 2027 for further ICAO Annexes.
- 1.2.4 ICAO have published two State Letters; SL2023.33 directed at States and the second State Letter 2025.79 containing further information on the requirements for ground handling organisations.
- 1.2.5 To fully understand the scale and complexity of the ground handling sector within the UK, the CAA conducted an initial survey of organisations providing ground handling activity at UK Certified and Licensed aerodromes was conducted in January 2024 and repeated in January 2025. This was achieved by contacting the aerodrome accountable managers to share the information.
- 1.2.6 We established an internal cross organisational working group to look at the proposal of ground handling regulations, and how we will engage with the industry.
- 1.2.7 Two webinars were held online during the autumn of 2024 with industry to explain the work being completed to date. Further in person industry engagement workshops are taking place this autumn with industry.
- 1.2.8 The survey revealed around 100 different organisations providing a range of ground handling activity. Ground handling organisations across the UK vary in size and organisational complexity.
- 1.2.9 Internationally recognised risks from ground handling activity are outlined within ICAO Doc 10121, in the table below.

Typical safety impact	Unsafe event	Ultimate consequence				
		Loss of flight control	Ground collision	Fire/smoke (Non – impact)	Runway excursion	Injuries to passengers, crew and ground staff
Critical	Load and balance error (including incorrect stowage)	X			X	X
	Event related to aircraft de-icing and anti-icing	X			X	X
	Event related to dangerous goods			X		X
Important	Event related to aircraft fuelling	X		X		X
	Event related to foreign object debris (FOD)	X		X	X	X
	Event related to the use of ground support equipment (GSE)	X	X		X	X
Sensitive	Event related to aircraft marshalling and parking		X			X
	Event related to aircraft pushback and towing		X		X	X
	Premature engine startup or incorrect taxiing		X			X
	Unwanted presence on movement area		X			X
	Event related to infrastructures		X	X		X

- 1.2.10 CAA Safety Intelligence conducted a review of the safety occurrences that met the statutory requirements to be reported as a Mandatory Occurrence Report (MOR) in April 2024. This information commissioned a safety assessment of the ground handling sector.
- 1.2.11 The activities that Ground Handling Service Providers (GHSPs) perform offer differing levels of safety risks and safety impacts.

Summary

- 1.3 The CAA believes that an opportunity exists to reduce the number of accidents and incidents, whilst improving cooperation between Airlines, Aerodromes and Ground Handling Service Providers (GHSPs) and improving the quality of safety management systems within GHSPs. Given the strategic drivers for change that will affect providers of ground handling services at UK aerodromes, the CAA believes that now is the time to consult on the implementation of future Ground Handling Regulations.

Chapter 2

Proposals on Regulating Ground Handling

Future Regulatory Options

- 2.1 The CAA proposes to establish a new regulatory framework for the provision of ground handling services at UK Certified and Licenced aerodromes.
- More information on certified and licenced aerodromes can be found on the CAA website within the [aerodrome](#) section.
- 2.2 The CAA set out a policy objective for the possible regulatory framework for ground handling; to reduce the number of accidents and incidents, improving cooperation between airlines, aerodromes, and ground handling service providers, and improving the quality of safety management systems within GHSPs.
- 2.3 The CAA have worked through a variety of feasible options in its approach for a possible regulatory framework.
- 2.4 Future regulatory proposals for ground handling aim to harmonise standards across Certified and Licensed aerodromes. By introducing a regulatory framework to all Ground Handling Service Providers, the framework will ensure safe operating conditions across the aerodrome ecosystem.
- 2.5 The CAA believe that the benefits of the proposed regulation will be:
- Risk Mitigation – these regulations will help identify potential safety hazards and enable the GHSP to implement measures to reduce or eliminate risks, ensuring safe ground handling operations at the aerodromes.
 - Standardisation – help create consistent standards for operations, equipment, and personnel, which will enhance consistency and reliability within the GHSP's operations.
 - Confidence – safety regulations for GHSPs will enhance industry confidence that the ground handling operations are regulated, with defined structure and framework with regulatory oversight, continuously improving the safety performance.
 - Reduction in accidents/incidents – with a key requirement being that the organisation develops a Safety Management System in accordance with ICAO Annex 19, this enables the GHSP to establish procedures for safe operations, equipment maintenance and personnel training with an aim

that all operations are conducted to the highest safety levels with competent staff.

2.6 The CAA future possible regulatory options that have been considered are:

2.6.1 Option 0: Do nothing – whereby the CAA would not introduce any additional regulations. The lack of regulatory framework and oversight would not address the current safety concerns around ground handling, which is reflected in the CAA top ten risks, under ‘inappropriately managed contracted activities leading to a reduction in safety performance’. This would result in the UK not adopting into our national regulations the ICAO standards and recommended practices, which promote global standards for safety relating to ground handling.

This option was discounted as it would not adopt into our national regulations the ICAO global standards for ground handling and would not achieve the objective of the proposed regulation by reducing the number of accidents and incidents by improving the quality of safety management systems through regulatory oversight and compliance.

2.6.2 Option 1: Non- legislative route. There would be no additional rulemaking or law changes, and the CAA would file a difference with ICAO. Consequently, there would be no legal requirement for GHSPs to seek approval or notify the CAA for aerodrome operations and additional safety benefits would not be realised. The CAA would continue to improve industry engagement directly with organisations and through various industry trade bodies. Despite considerable industry engagement for a number of years through GHOST, ground handling remains within the UK CAA’s top ten risks.

This option was discounted as it would not adopt into our national regulations the ICAO global standards for ground handling. The limited industry engagement has not had the required impact to reducing the number of accidents and incidents, and the CAA would still not have a role in having regulatory compliance and oversight of GHSP’s SMS.

2.6.3 Option 2: Activity Targeted Regulation. The proposed regulation would target specific ground handling activity with the greatest safety risk. The foreseen challenges around this option are regulatory complexity and difficult industry messaging around which activity was classified as high safety risk. As safety data quality and quantity improves during regulation, there could be movement of safety risks and concerns between different activities, or an activity becomes an unperceivable safety risk which is not realised until an accident or incident. This would require changes to the legal framework as potentially new activities fall into scope.

This option would create regulatory complexity on both the CAA and the industry, with the scope of what activities are regulated changing and would require the accurate reporting of safety occurrences to provide the quality of

safety intelligence needed. The policy objective is to have the ability to affect the quality of the Safety Management Systems of the GHSPs which would ultimately have an effect on all the activity that they would perform. Due to the reasons above, this option was discounted.

- 2.6.4 Option 3 – Certified aerodromes only: The proposed ground handling regulation would only be applicable to Certified Aerodromes. This option could generate a commercial disadvantage to the industry where ground handling service providers have operations in both certified and licensed aerodromes and could result in regulatory inconsistency and create additional complexity within organisation's management systems.

Due to these reasons, this option was discounted as it would not meet the proposed policy objectives.

- 2.6.5 Option 4 – Certified and Licenced aerodromes. This would require updates to the UK regulatory framework; the Air Navigation Order under the Civil Aviation Act 1982, transposing the relevant ICAO Annex 14 SARPs. Amendments will also be required under the Basic Regulation 2019/1139, along with Air Operations 965/2014 and Aerodrome Operations 139/2014. All GHSPs providing ground handling services would be in scope of the proposed regulation. This option will enable safe operating conditions at both Certified and Licenced aerodromes.

This option meets the proposed policy objectives.

- 2.7 The CAA's preferred option for regulating ground handling is option 4 as it would achieve the policy objective of the proposed regulation by having the regulatory means necessary to reduce the number of accidents and incidents by improving the quality of safety management systems through regulatory oversight and compliance.

- 2.8 The proposed ground handling regulations would come into force from November 2027.

- 2.9 It is proposed that the ground handling regulations would apply to the following types of organisations:

- A provider of one or more ground handling services operating as a standalone organisation or as part of a single ground handling organisation business grouping.
- Aerodrome operator providing ground handling services.
- Aircraft operator providing ground handling services to itself or within a single air carrier business grouping (self-handling).

- 2.10 It is proposed that there will be a transition period, of 3 years from date of regulations coming into force. The purpose of the transition period is to allow for all GHSPs to ensure that they are compliant with the proposed regulation and to notify the CAA to gain approval depending on the options discussed in 2.18.

ICAO Developments

- 2.11 The International Civil Aviation Organisation (ICAO) is a United Nations agency formed in 1944. ICAO global role in aviation is to:
- Set global standards for aviation safety, security, efficiency and environmental protection;
 - Develops and maintains Standards and Recommended Practices (SARPs) which member states adopt into their national regulations;
 - And facilitates co-operation among its 193 member states and industry stakeholders.
- 2.12 ICAO Aerodrome Design and Operations Panel (ADOP) developed a Ground Handling Services Manual (DOC 10121) in late 2019 and this work was led by the UK CAA, ADOP and the GHTF.
- 2.13 In August 2025, ICAO published a State Letter detailing proposed Standards and Recommended Practices (SARPS) for ground handling with topics on harmonisation and collaboration, documentation, training, safety management and operations and facilities pertaining to ground handling service providers. It is our intention that the possible regulatory framework for ground handling would include all the ICAO SARPs.
- 2.14 The ICAO SARPS are detailed further within Annex A.

Approval of Ground Handling Service Providers

- 2.15 The CAA have been reviewing options on how GHSPs will advise us of their ground handling operations at Certified and Licenced aerodromes.
- 2.16 The intention of the CAA is for a form of approval or acknowledgement to the GHSPs that provide ground handling services.
- 2.17 The approval or acknowledgement from the CAA does not replace the local aerodrome requirements for third party organisations under UK(EU)139/2014 or under UK(EU)965/2012 and is an additional requirement.
- 2.18 The options that the CAA considered are:
- 2.18.1 Option 0 – do nothing. Remain as is today, we do not provide any approval or acknowledgment for a ground handling organisation to conduct ground handling

services at aerodromes. This would create obstacles for regulatory oversight and ensuring compliance to the proposed regulations.

This option was discounted as it did not meet the policy objectives.

- 2.18.2 Option 1 – Licence. Each GHSP would apply to the CAA for a licence, following published licencing requirements. Any amendments to the licence would need to be notified to the CAA. There could be disadvantages to the industry sector due to delays in issuing licences which may impact the commercial aspect of GHSPs already providing services and an additional administration burden. This option would enable us to perform a regulatory oversight program and for us to perform audits, to review the GHSPs's compliance to the regulation. Areas of non-compliance identified during the audits would result in findings, or possible further enforcement actions, such as limiting, suspending, or revoking an organisation's declaration.

This option was worked and whilst it would provide the CAA with the means necessary to achieve the policy objective set out in 2.2, it would be difficult and complex to provide a licence approval process for organisations that are and have been providing a ground handling service before regulation. Subsequently, this option was discounted. Further information on the regulatory enforcement and our code of practice can be found on the [CAA website](#).

- 2.18.3 Option 2 – Declaration. Each GHSP would declare to the CAA, with a declaration per organisation, with additional annexes for each aerodrome they operate and what activity.

The declaration would need to be completed and submitted outlining the principal place of business, along with specific information about the organisation and the type of ground handling activity undertaken at each UK aerodrome. When submitting the declaration, the GHSP is confirming compliance to the regulation and shall maintain continued compliance throughout its activities. Any changes to the GHSP organisation would need to be reviewed through a Management of Change and to consider whether an update to the submitted declaration would be required.

During the transition period, current and new GHSPs will be required to complete a declaration to the CAA. The exact process on how to submit a declaration will be further advised prior to the law being in force, with sufficient notice to enable GHSP organisations time to ensure timely submission.

The advantage of the declaration process is that it would not impact the commercial or operational running of the GHSP's business and will have the framework for regulatory oversight enabling us to perform audits, to review the GHSPs's compliance to the regulation. Areas of non-compliance identified during the audits would result in findings, or possible further enforcement actions such as limiting, suspending or revoking an organisation's declaration.

This option would achieve the policy objective of the proposed regulation by the CAA having the means necessary to reduce the number of accidents and incidents by improving the quality of safety management systems through regulatory oversight and compliance. Further information on the regulatory enforcement and our code of practice can be found on the [CAA website](#).

- 2.19 The CAA's preference is for option 2, declaration.

Future Relationship with the CAA

- 2.20 The CAA commissioned work in January 2025 on reviewing the options available for future regulatory oversight of GHSPs.

- 2.21 The data that was gathered during the survey of GHSPs operating at UK Certified and Licenced aerodromes that was gathered in January 2024 and updated in January 2025 was used.

- 2.22 Regulatory oversight will be conducted following our Performance Based Regulation (PBR) and Risk Based Oversight (RBO) business principles.

Further information on RBO can be found within [CAP2386](#) which further explains the process we follow of defining and measuring the complexity of an aviation entity, the gathering of safety risk and performance information, assessing the entity's performance in managing their safety risks, engaging with the entity's accountable manager and directing future regulatory oversight activity to gain appropriate safety assurance and identity and promote safety improvements.

Further information on Performance Based Regulation (PBR) can be found on the [CAA website](#).

- 2.23 The CAA considered the following shortlisted options:

- 2.23.1 Option 1 – Use of existing oversight. Oversight from existing CAA Inspectorate teams within Aerodromes and Flight Operations. This would require up skilling of current CAA Inspectors, with additional statutory amendments to Aerodrome Operations UK(EU)139/2014 and Aircraft Operations UK(EU)965/2012. This would require additional regulatory requirements on aerodrome operators and UK Aircraft operators, with the impact of the requirement for them to increase their own oversight program for their third-party oversight, for ground handling organisations. This would have resulted in a regulatory light touch to oversight with limited enforcement capability with any findings being served on either the aerodrome or aircraft operator.

This option was discounted as it would result in the CAA having limited regulatory influence and enforcement capability on GHSPs and would have

difficulty in meeting the policy objectives by reducing the number of accidents and incidents and improving the quality of GHSP's Safety Management Systems.

- 2.23.2 Option 2- Full oversight at each aerodrome. The CAA would form a ground handling oversight team, which would inspect both the HQ of the GHSP along with each aerodrome that each GHSP had an operation. It was considered that this option would be a too high burden on the GHSPs and does not align with our PBR and RBO processes. This option would enable us to perform audits, to review the GHSPs's compliance to the regulation, and may identify areas of non-compliance which would result in findings, or possible further enforcement actions, which may include limiting, suspending or revoking an organisation's licence or declaration in the event that a non-compliance from an audit or a safety management issue cannot be resolved to the satisfaction of the regulator.

This option was discounted as it would not have aligned with our internal oversight processes and would not have resulted in a reasonable and proportionate oversight program.

- 2.23.3 Option 3 – Risk Based Oversight. The CAA would require a team of ground handling oversight inspectors. The oversight model would be in accordance with our PBR and RBO processes: a GHSP Headquarters' audit reviewing the organisation's Safety Management System and overall compliance to the proposed regulation, followed by an oversight sampling of aerodromes where that GHSP has an operation. The size of the oversight sample would be proportionate to the size and complexity of the GHSP and will enable the regulator to observe and assess safety performance, including review of regulatory compliance; this may identify areas of non-compliance which could result in findings or possible further enforcement actions. Enforcement action may include limiting, suspending, or revoking an organisation's licence or declaration if a non-compliance from an audit, or a safety management issue, cannot be resolved to the satisfaction of the regulator.

This option achieves the policy objectives, as the regulatory approach and oversight programme would be fair, reasonable, transparent, and proportionate.

- 2.24 The CAA's preferred option for oversight is option 3.

- 2.25 During the implementation period, the CAA propose to establish an industry engagement forum. The forum will ensure that stakeholders impacted by the proposed regulation can collaborate with each other and the CAA.

The Consultation

Purpose of the consultation

- 3.1 The purpose of this consultation is to:
- seek the views of Ground Handling Service Providers, Aerodrome Operators and Aircraft Operators on the CAA's proposals for regulating ground handling; and
 - set the context for the regulation of Ground Handling Service Providers.

Conduct of the consultation

- 3.2 The consultation period will run for 14-weeks from 27th October 2025 to 30th January 2026, taking into account the festive break.
- 3.3 This consultation will be managed through Citizenspace. Stakeholders are requested to use the response tool within Citizenspace to submit their comments on the CAA's proposals described within this document.
- 3.4 The Citizenspace response tool offers the ability to provide targeted responses on specific aspects of the proposals and 'free-text' boxes for more general comments. Respondents should indicate whether they support or object to the proposals and comment accordingly. Should a respondent object to the proposal or an aspect of it, they should explain their rationale and, where appropriate, offer an alternative proposal. Where respondents indicate a preference for an alternative solution(s), these should be supported by appropriate justification.

Consultation questions

- 3.5 For ease of reference for stakeholders, a list of the questions asked in the Citizenspace tool are included in [Annex B](#).

Conclusion of the consultation

- 3.6 Following the consultation, stakeholder's comments will be collated and analysed. The CAA will then publish a consultation report which collates those comments and our responses, and explains what we will do next.

CAA focal point

- 3.7 Stakeholders seeking clarification on the proposals detailed herein should contact Mark Griffiths (Ground Handling Policy Specialist) via email with the subject header 'Consultation on Ground Handling Regulations' at mark.griffiths@caa.co.uk

ANNEX A.

ICAO State Letter

Extract from ICAO State Letter issued 18th August 2025.

- A1 The aircraft operator, when outsourcing operational activities, shall retain responsibility for ensuring that its operational safety performance is maintained and have a process in place to assess, control and monitor third parties.
- A2 The aircraft operator, when outsourcing ground handling services, shall consider the safety performance of the ground handling service provider as an integral part of its safety management system and ensure that the ground handling service provider is provided with the operator's instructions and procedures for ground handling activities.
- A3 An aircraft operator should provide documentation detailing specific aircraft characteristics (such as aircraft dimensions, service access points, towing requirements) for the use and guidance of ground handling service providers, for each aircraft type and variant
- A4 The aircraft operator, when outsourcing ground handling services, shall consider the safety performance of the ground handling service provider as an integral part of its safety management system and ensure that the ground handling service provider is provided with the operator's instructions and procedures for ground handling activities.
- A5 This chapter has been primarily developed for both the ground handling service provider (GHSP) and aerodrome operators. Where procedures are applicable to one or the other it is specified. Where procedures are applicable to both, the terms have been kept neutral.

The aerodrome operator, aircraft operators and GHSPs shall coordinate on a common set of globally standardized procedures for GHSPs to follow.

- A6 The aerodrome operator shall:
 - a) establish a local agreement for each GHSP prior to commencement of operations on the aerodrome;
 - b) ensure coordination between its own SMS, that of home-based aircraft operator(s) and, where applicable, the GHSP(s);
 - c) ensure that GHSPs operating on the aerodrome are included in the aerodrome emergency response plan;

d) ensure the establishment of training standards and procedures for the use of fixed apron equipment; and

e) include a process to report and document faults and maintenance activities in the maintenance programme for all fixed apron equipment on the aerodrome.

A7 The GHSP is responsible for the safe operation of its activities at the aerodrome. To enable this, the GHSP shall:

a) have a safety management system;

b) have all the means, including but not limited to, facilities, personnel, equipment and material necessary to ensure safe provision of service at the aerodrome;

c) comply with the procedures contained in the aerodrome manual, including those in relation to movements of its vehicles, equipment and personnel and the risk related to aerodrome operations at night and in adverse weather conditions;

d) adhere to all operational restrictions promulgated by the aerodrome operator relative to the current operational situation on the aerodrome;

e) establish and maintain an operations manual, including relevant standard operating procedures (SOPs);

f) ensure that manuals for the operation and maintenance of ground handling equipment are available, applied in practice and cover operation, maintenance and repair instructions, servicing information, troubleshooting and inspection procedures;

g) ensure that personnel are trained, competent and fit for the duties they carry out;

h) retain responsibility for the safety of services carried out on their behalf by third parties;

i) ensure that the GSE and vehicles are used for the purpose they are designed for, including specific type of aircraft and services provided; and

j) ensure that GSE and vehicles are operated in a manner to minimize the risk of injuries to personnel and damage to aircraft, other GSE and vehicles or aerodrome infrastructure.

A8 The GHSP shall ensure the establishment of an occurrence reporting system in order to contribute to the continuous improvement of safety. The occurrence reporting system shall be compliant with the applicable State Regulation.

- A9 The GHSP maintenance programme shall ensure that all ground support equipment (GSE) and vehicles used to conduct the operations specified in its local agreement with the aerodrome operator are:
- a) maintained in accordance with instructions and/or guidance from the GSE and vehicle manufacturer by competent personnel;
 - b) subject to scheduled preventive maintenance inspections;
 - c) in a safe and serviceable condition prior to being used in operations;
 - d) reported and tagged as “out of service” when found to be defective and not utilized in operations; and
 - e) subjected to an inspection prior to return to operations.

Harmonisation and coordination

- A10 Processes should be in place between the aerodrome operator, aircraft operators and GHSP on the aerodrome to ensure interaction and coordination between their SMS. The safety responsibilities and interactions between each stakeholder should be established and coordinated.
- A11 Standard operating procedures (SOPs) of the aircraft operator, aerodromes and GHSP should describe how to safely undertake tasks and activities for operations and consider aspects such as quality, performance, security and occupational health and safety.
- A12 The adaptation of SOPs to address specific aircraft operator requirements, local aerodrome environment, safety procedures and/or operational constraints should be based on a risk assessment and agreed by all relevant stakeholders.
- A13 When developing the aerodrome procedures that can impact ground handling provisions, the aerodrome operator should consider aspects such as the local traffic mix, operating conditions, infrastructure or capacity limitations and weather conditions.
- A14 Communication protocols should:
- a) be established and shared between the aerodrome operator, GHSPs, aircraft operators and other relevant stakeholders to facilitate the initial activation of the response to an emergency; and
 - b) ensure the availability of regularly updated emergency contacts.
- A15 The aerodrome operator should ensure that processes are in place to provide timely information on the current operational situation, as well as any restrictions applicable, to all relevant stakeholders.

- A16 Any relevant safety-related committee should include the GHSP(s) and all other stakeholders involved in operational activities on the apron.
- A17 The GHSP should participate in aerodrome-wide safety promotion activities, which are led and coordinated by the aerodrome operator and includes actions such as safety campaigns, workshops on specific safety related issues, seminars and meetings.
- A18 When multiple GHSPs share a workplace, they should cooperate to provide a safe and healthy environment for all personnel.

Documentation

- A19 In addition to the arrangements established between an aircraft operator and a GHSP, an agreement established between the aerodrome operator and GHSP should cover, as a minimum, details regarding:
- a) monitoring of safety;
 - b) operational responsibilities;
 - c) scope of services (including outsourced);
 - d) applicable aerodrome rules and regulations; and
 - e) relevant safety performance requirements.
- A20 The aerodrome operator should ensure the promulgation of local aerodrome safety rules and procedures.
- A21 The GHSP should promulgate local aerodrome safety rules and regulations to all their personnel operating in the airside and include them in a compliance monitoring function of an internal management system, when available.
- A22 The operations manual should be developed by the GHSP in accordance with Attachment A to this chapter.
- A23 The GHSPs operations manual should contain a standardized set of procedures for ground handling relevant to the services provided.
- A24 The GHSP operations manual should contain a local emergency response plan and procedures aligning with the aerodrome emergency plan.
- A25 The GHSP should provide the aerodrome operator with an up-to-date copy of its local emergency response plan as well as the final report and improvement action plan for all exercises conducted on the aerodrome.
- A26 A copy of relevant SOPs contained in the GHSP operations manual should be made available to each personnel, according to their tasks and communicated in a manner that ensures their understanding.

A27 The relevant parts of the GHSP operations manual, containing the procedures for services provided on the aerodrome, should be made available to the aerodrome operator and aircraft operators.

A28 The GHSP should have a formal written process that controls the turnaround operation in their operations manual, such as a turnaround plan.

Note.— If a local aerodrome turnaround plan is established in consultation with the relevant aircraft operator(s), the GHSP can use this rather than developing a specific one.

A29 The GHSP should have a system for the management and control of documentation and/or data used directly in the conduct or support of ground handling operations.

Training

A30 The GHSP should develop a training programme appropriate to the roles and responsibilities of each functional position including theoretical training, on-the-job training and regular competency checks, all of which should be documented and recorded.

Note.— Training resources should be commensurate with the size and scale of the organization and take into account the frequency of the training, staff turnover and seasonal variation.

A31 The GHSP training programme should include relevant aspects of the local aerodrome safety rules and regulations. The training should consider all types of aerodrome users and operating conditions.

Note.— All types of aerodrome users and operating conditions include variables such as different aircraft types, other apron activities, adverse weather and nighttime operations.

A32 In designing the training programme, human factors principles should be considered.

A33 Personnel should be given initial training prior to commencement of operational tasks and a process to maintain competence should be established.

A34 Training should be conducted by personnel who have demonstrated competence on the subject to be instructed and who have the skills to deliver the training effectively.

A35 As part of the training programme, the GHSP should ensure that personnel meet local and national competency requirements and have processes in place to ensure that training objectives are met.

- A36 The GHSP should train all relevant personnel on their role during an emergency, including the use of any emergency equipment required, as per their local emergency plan.
- A37 Fuelling safety awareness should be included in apron safety training for all personnel, especially in driver training, to make them aware of the safety risks associated with high-pressure hoses delivering fuel to the aircraft from fuelling equipment and the presence of the electrical bonding wire.
- A38 The aerodrome operator should have access to and regularly monitor the GHSP training programme and training records to ensure that all personnel are trained and competent in the local aerodrome safety rules and regulations as specified by the aerodrome operator.
- A39 The aerodrome operator or equipment owner should monitor the established training programme for fixed equipment used by the GHSP or aircraft operator with the aim of ensuring that only trained personnel are operating the equipment.

Note.— In cases where the ownership of fixed apron equipment is with an entity other than the aerodrome operator, the responsibility of monitoring the established training programme is the responsibility of the equipment owner.

Management of safety

- A40 The aerodrome operator's SMS should monitor and provide safety assurance of activities and services conducted on the aerodrome as defined in the ground handling agreement established with the GHSP, taking into consideration the specific capabilities and responsibilities relative to the services provided.
- A41 The safety performance requirements included in the agreement between the aerodrome operator and the GHSP should not conflict with the requirements that the aircraft operator may have established in its agreement with the GHSP.

Note 1.— The performance requirements included in the agreement between the aircraft operator and the GHSP should not cause a conflict with the local safety rules and requirements of the aerodrome operator.

Note 2.— The safety performance agreed between the aerodrome operator and the GHSP should as a minimum meet the requirements of the State Safety Programme (SSP).

Note 3.— Aerodrome operators may also include aspects related to areas such as security, environment and sustainability, liability, use of space, emergency management, etc. in the agreement between the aerodrome operator and the GHSP.

- A42 The aerodrome operator should, without prejudice to safety culture, ensure that apron safety rules are enforced by means of monitoring, audits, training and inspections.
- A43 In the absence of occupational health and safety regulations from the State, the GHSP should establish an occupational health and safety programme aligned with industry best practices.
- A44 The safety monitoring conducted by the aerodrome operator should be based on the “local aerodrome rules”.
- A45 The aerodrome operator should ensure safety campaigns are coordinated and safety data, such as that related to trends in safety occurrences and data related to identified hazards, is shared between all stakeholders.
- A46 Aerodrome operators should ensure participation of GHSPs in the aerodrome emergency plan through coordination between individual organization’s emergency plans and, when appropriate, inclusion in emergency exercises.
- A47 The GHSP should ensure that safety performance management requirements and responsibilities for the delivery of any services carried out by third parties on its behalf are established in an agreement.
- A48 The GHSP should notify the aerodrome operator or aircraft operator, where appropriate, of any services carried out by third parties on its behalf.

Operations and equipment

- A49 The aerodrome operator or equipment owner should establish a monitoring programme to ensure the operation of fixed equipment used by the GHSP or aircraft operator is in accordance with the established standard operating procedures.
- A50 The aerodrome operator or equipment owner’s maintenance programme should include all fixed equipment where available, including but not limited to:
- a) passenger boarding bridge;
 - b) fixed ground power;
 - c) pre-conditioned air; and
 - d) visual docking guidance system.

Note.— The fixed equipment at an aerodrome may be owned by the aerodrome operator or by a third-party equipment owner who is responsible for the maintenance and upkeep of the equipment. In cases where the ownership of fixed apron equipment is with an entity other than the aerodrome operator, the responsibility of maintenance needs to be established among those parties involved.

- A51 The maintenance programme for fixed equipment should include as a minimum:
- a) an inspection and fault reporting process;
 - b) preventive and corrective maintenance processes; and
 - c) a record keeping process.
- A52 The maintenance records for fixed equipment should be made available for the purpose of oversight, periodical monitoring and investigations, when requested.
- A53 The preventive and corrective maintenance processes included in the maintenance programme should ensure that available fixed facilities are:
- a) maintained in accordance with instructions and/or guidance from the manufacturer;
 - b) serviceable and in good condition prior to being used; and
 - c) reported and tagged as “out of service” when found defective.
- A54 The GHSP should document the maintenance performed on all GSE and vehicles and ensure that such documents are retained for a specified period, as appropriate.
- A55 The GHSP should ensure that vehicles and equipment are fit for purpose and in a condition that will not endanger aircraft, vehicle users, other vehicles, pedestrians or property.
- A56 In the case of ‘pooled’ GSE and vehicles, specific arrangements should be established between the GHSP and the organization providing the GSE and vehicles to meet all applicable requirements. This arrangement may or may not include the aerodrome operator.
- A57 When procuring GSE and vehicles or modifying existing ones as per the manufacturer’s standards, human factor principles, including ergonomics, and vehicle and equipment controls should be considered. The aim should be to ensure standardized GSE and vehicle controls across the ground handling fleet used at the aerodrome.
- A58 The scope of ground handling services and activities in Chapter 11 is listed below:
- a) passenger handling, including passengers with reduced mobility, covering the safety of passengers during ground transportation, boarding and disembarkation;

b) baggage handling covering the preparation of baggage for safe loading in the sorting area;

c) aircraft handling and turnaround activities covering the following:

- 1) provision and operation of ground support equipment (GSE) and other vehicles used for ground handling purposes;
- 2) aircraft refuelling and defueling, namely into-plane fuelling services;
- 3) aircraft toilet servicing;
- 4) potable water servicing;
- 5) catering loading and unloading;
- 6) aircraft cabin cleaning;
- 7) aircraft ground de-icing and anti-icing;
- 8) activities upon aircraft arrival and for departure, including but not limited to marshalling*, aircraft securing on the ground, accessing doors, aircraft loading and unloading of baggage, cargo, mail and loading supervision;
- 9) activities upon aircraft departure; 10) aircraft towing and pushback; and
- 11) crew and passenger transportation.

* *Where considered as part of ground handling activities.*

d) cargo and mail handling covering the following activities performed at an aerodrome, after cargo acceptance:

- 1) preparation for the flight;
- 2) final build-up and storage, if applicable;
- 3) final checks before the flight; and
- 4) ground transportation of cargo and mail between the cargo terminal and the aircraft.

Note.— Activities in 1), 2) and 3) may be performed in a cargo terminal or a cargo warehouse at an aerodrome or adjacent to it.

A59

The following activities are excluded from the scope of ground handling in the context of the provisions content in Chapter 11 of PANS-Aerodromes:

- a) control and supervision of flight operations performed by flight operations officers/flight dispatchers as specified in Annex 6;

b) load control tasks related to load planning, mass and balance calculations, load control messages and communications and issuance of load control documents; and

c) aircraft line maintenance or other aircraft maintenance activities performed by maintenance organizations.

CONTENTS OF GROUND HANDLING SERVICE PROVIDER OPERATIONS MANUAL

A60 The following structure may be considered by the GHSPs when developing an operations manual as a part of the total management system, which may be issued in separate parts corresponding to specific aspects of operations.

1) General

a) Contents

b) Record of revisions / list of updates / effective date

c) Introduction, purpose and scope

d) Definitions

e) Abbreviations

f) Language

2) Organization and management

a) Management system

b) Organization structure

c) Management accountability and responsibilities

d) Communication policy

e) Management reviews

f) Provision of resources

g) Procurement policy

h) Environment and sustainability policy

3) Documentation system

a) Documentation control

b) Record keeping

- c) Review process
- d) Documentation of deviation
- 4) Safety management system (SMS)
 - a) Safety policy
 - b) Risk management
 - c) Safety assurance
 - d) Safety promotion
- 5) Emergency and contingency planning procedures
 - a) Emergency response procedures
 - b) Roles and responsibilities
 - c) Contact details
 - d) Reporting mechanism
 - e) Records of emergency exercises
 - f) Training on emergency procedures
- 6) Security
 - a) ID/access control
 - b) Aircraft security
 - c) Passenger and baggage
 - d) Security threats
 - e) Cyber security
- 7) Occupational health and safety
 - a) Manual handling
 - b) Fatigue management programme
 - c) Lone working
 - d) Health control preparedness (such as pandemics)
 - e) Substance abuse
 - f) First aid
 - g) Human factors

8) Training and competency

- a) Training needs analysis
- b) Competence of trainers
- c) Training syllabus
- d) Standardised training materials
- e) Documentation and records

9) Outsourced services

- a) Identification and selection of outsourced services
- b) Contract management
- c) Monitoring of outsourced services

10) Ground service equipment management

- a) Ground service equipment procurement and/or refurbishment policy
- b) Maintenance programme for ground service equipment
- c) Documentation and records

11) Airside safety

- a) Airside safety procedures
- b) Airside driving safety
- c) Adverse weather
- d) Foreign object debris management
- e) Engine danger areas

12) Aircraft handling procedures

- a) Pre-arrival, staging and preparedness
- b) Hand signals
- c) Arrival
- d) Chocks and safety cones
- e) Parking and mooring
- f) Aircraft approach
- g) Ground service equipment operations

- h) Turn around coordination and loading supervision
- i) Toilet and potable water
- j) Fuelling operations
- k) Aircraft doors and panels
- l) Loading and unloading
- m) Aircraft cleaning – interior
- n) Aircraft cleaning – exterior
- o) Pre departure checks
- p) Towing/push back and power back and self-manoeuving
- q) De-icing operations
- r) Departure
- s) Hangar and long term parking

13) Passenger handling procedures

- a) Acceptance procedures
- b) Special category of passengers handling
- c) Live animals/pets/service animals
- d) Security
- e) Cabin baggage
- f) Prohibited items
- g) Other goods and special luggage
- h) Departure, transit, and boarding
- i) Arrival, passenger disembarking
- j) Safety of passengers airside
- k) Mishandled and unclaimed baggage

14) Baggage handling procedures

- a) Security of baggage
- b) Baggage segregation and reconciliation
- c) Unit load device inspection and build up

d) Un-containerized hold baggage

15) Load control

a) Load planning

b) Mass and balance calculation

c) Load sheet

d) Departure messages

16) Dangerous goods

a) Awareness training

b) Dangerous goods handling and loading

c) Dangerous goods documentation including NOTOC (Notification to Captain)

d) Dangerous goods emergency procedure and event reporting

17) System assurance

a) Compliance monitoring

b) Internal audit and inspection plan

c) Continuous improvement process

ANNEX B.

Consultation Questions

Introduction

The CAA uses the Delib Citizenspace digital engagement tool to host and manage public consultations with our stakeholders. The Citizenspace 'landing page' for this consultation will provide an overview of the proposal and a link to the consultation survey where stakeholders can make their responses. We are unable to accept feedback on our proposals through any other means.

The survey

Section 1 – Stakeholder information

The first part of the survey is intended to gather information on who is providing the survey response. Is it an organisation or an individual that is responding and, if the latter, which sector do they work within; Aerodrome Operator, Aircraft Operator or Ground Handling Service Provider? Stakeholders will be offered the opportunity for their response to be published anonymously, otherwise your name and, if appropriate, organisation will be published alongside your response in our consultation report.

Section 2 – The proposal

The next part of the survey asks a series of questions relating to the CAA's proposals regarding the proposed regulation of ground handling.

- Do you agree with the CAA's proposal to regulate the ground handling sector across UK Certified and Licenced aerodromes? If not, please explain your rationale.
- If you agree with the proposal to regulate ground handling, do you agree with the CAA's rationale for it? If not, are there any alternative options or additional factors that we should consider?
- Do you agree with the CAA's proposal on the preferred regulatory option? If not, please explain your rationale.
- Do you agree with the CAA's preferred option for regulatory oversight? If not, please explain your answer.
- Do you agree with the CAA's proposed transition period of 3 years? If not, please explain your answer?

- The CAA's preferred option for application by GHSPs is declaration, do you agree with this? If not, please explain your answer?
- Do you agree with the contents of the ICAO State Letter contained within Annex A? If not, please explain your answer.
- Do you have any further comments which the CAA should consider as part of this consultation?

Section 3 – Impact Analysis

Section 70(1) and 70(2) of the Transport Act 2000 place a number of duties upon the CAA in the exercise of its air navigation functions. The Equality Act 2010 places a duty upon Public Sector bodies to ensure that its proposals do not disadvantage people who are protected under that Act. To assist us in satisfying these duties, in addition to comments on the specific proposals themselves, we invite stakeholders to describe the impacts that they perceive the proposal may have on six specific areas:

- **Safety.** What impact might the proposal have on safety?
- **Efficiency.** What impact might the proposal have on the efficiency of the ATM system, either locally or nationally?
- **Financial.** What financial impact might the proposal have? Will implementation have a financial cost?
- **Security.** What impact might the proposal have on aviation security?
- **Environmental.** What impact might the proposal have on the environment; for example, through increased fuel burn, increased CO2 emissions?
- **Equality.** Do you consider that this proposal may disadvantage people who are protected under the Equality Act 2010? The Equality Act provides that the following are protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex and sexual orientation.

Stakeholders are invited to state the impact that they consider the proposal will have on each of these six specific areas from one of four options:

- Positive impact;
- Negligible impact – should be used where there is an impact, either positive or negative, but where its' impact is considered too small to be worth taking into account;
- No impact;
- Negative impact.