



**WORKING PAPER**

**HIGH-LEVEL CONFERENCE ON COVID-19 (HLCC 2021)**

**SAFETY STREAM**

**Montréal, Canada, 12 to 22 October 2021**

**Agenda Item 3: Standardization**  
**3.3: Ground handling**

**CONSIDERATIONS ON THE NEED TO STRENGTHEN THE  
REGULATION OF GROUND HANDLING**

(Presented by the International Transport Workers' Federation (ITF))

**EXECUTIVE SUMMARY**

The International Transport Workers' Federation (ITF) commends the work undertaken in ICAO, aiming to strengthen the regulation of ground handling services to enhance safety, consistency, capacity and efficiency of aerodrome operations. This working paper notes the importance of adopting a holistic approach that supplements core regulatory reforms concerning ground handling at aerodromes. The paper welcomes the progress whilst at the same time emphasising the urgency of the problem.

**Action:** The Conference is invited to:

- a) note the critical importance of the development of Standards and Recommended Practices (SARPs) and Procedures for Air Navigation Services (PANS) related to ground handling as a matter of priority;
- b) amend Annex 9 — *Facilitation* in line with the FALP/12-WP/19, recommended practice 6.5 and add recommended practice 6.6.
- c) develop Standards to assist States in bringing ground handling into an operator's safety management system (SMS); and
- d) establish and support a positive safety culture rooted in "Just Culture". Ground handling workers therefore are able to, either directly or through their trade union, voluntarily and confidentially report safety concerns without fear of reprisal in line with all other areas of aviation safety-critical tasks.

**1. INTRODUCTION**

1.1 The ITF agrees with the problems described in the working paper presented by the Secretariat and entitled, "Global initiative to strengthen the regulation of ground handling". In the paper's

<sup>1</sup> Arabic, Chinese, English, French, Spanish and Russian versions provided by ITF.

own words, “With the evolution of ground handling services including the proliferation of third-party ground handling service providers (GHSPs), ground operations on aerodrome aprons have become increasingly complex and potentially hazardous.”

1.2 The above-mentioned working paper provides concrete data concerning ground handling accidents that cost billions of dollars and thousands of lost work-hours per year. Moreover, particularly over the last 15 years, the ITF has received similar reports from its ground handling affiliates analogous with the ICAO Accident/Incident Data Reporting (ADREP) data. Most importantly this has had a negative impact on the culture of safety within aviation.

1.3 The ITF commends the work undertaken in ICAO since 2014 to investigate the safety, efficiency and standardization issues associated with ground handling and to determine the status and future needs of ICAO provisions concerning ground handling at aerodromes.

1.4 The ITF strongly supports the current recommendations made by the Secretariat, aiming to develop a regulatory framework for ground handling that States can implement worldwide and do so in a harmonized manner.

1.5 Despite its high level of urgency, and the progress made in ICAO so far, we recognize that substantial further work is required to develop an appropriate holistic regulatory framework for ground handling which is commensurate with the safety standards across the industry.

## 2. DISCUSSION

2.1 We believe the seriousness and urgency of the situation in the main stem from the fact that ground handling services have been subject to rapid market expansion, and this has been insufficiently accompanied by equally effective checks and balances that support a complete global aviation safety ecosystem. Additionally, aerodrome operators have largely been bystanders to the rapidly evolving relationship between aircraft operators and ground handling providers. Their role, often as a landlord, should be recognized for its potential to facilitate and ensure greater integration into the safety eco-system utilising the continuity of oversight and presence, which aircraft operators may well not have.

2.2 With the proliferation of third-party GHSPs, the market became highly fragmented. This fragmentation of supply chains through subcontracting and/or outsourcing is also reflected in the fragmentation of safety culture and safety management systems at both the industry and company levels. The ITF believes that the fragmentation of safety is one of the underlying reasons that means ground operations carry potentially greater risks. Moreover, the process of subcontracting and outsourcing has been shaped by different local regulatory regimes and has developed in a combined and uneven fashion in different parts of the world.

2.3 In many circumstances, ground handling personnel as part of their day-to-day work requirements must apply different processes and practices for each aircraft operator that the ground handling provider serves. This proliferation of standards and practices exposes ground handlers to greater possibility of making unforced errors and creates a potential risk to personnel, the aircraft and equipment.

2.4 The *Manual on Ground Handling* (Doc 10121) encourages GHSPs to establish an appropriate SMS. However, as guidance material, the manual is not sufficient to ensure development and implementation of such systems at a national level. Therefore, additional mechanisms are required to encourage States to urge their GHSPs to develop and implement appropriate SMS.

2.5 To enhance the safety and efficiency of aerodrome operations, proactive identification of safety-related problems is vital. This approach also allows for the specification and recording of accidents and incidents, and overall safety trends. The ITF believes that a clearly defined positive safety culture policy and the programme will benefit the safety management of ground operations.

2.6 Increasing stress and workload inflate the possibility of unforced errors for ground handling workers, which may increase the risk to the general public. Many ITF affiliated civil aviation unions see this factor as being partly responsible for the increase in airside accidents. Since the ITF launched a co-ordinated airport programme seven years ago, considerable evidence has been collected suggesting that many airports worldwide have seen a fundamental reduction in safety levels in tandem with drives to lower costs, thereby creating “airports of economic convenience” at the expense of staff safety and welfare. The ITF collected this evidence from personnel in baggage handling, maintenance, check-in, boarding agents, cleaning, security and other ground workers in each airport.

2.7 Unstable employment conditions also impact on airport security. Wheelchair workers, baggage handlers, cabin cleaners, catering staff and ramp agents are all frontline workers responsible for identifying safety and security concerns. High turnover in these jobs also creates security risks for the industry as a whole therefore is not only a problem for the companies that must constantly hire, train and manage new employees, but also for airlines and their passengers.

2.8 Appropriate training of ground handling workers is a crucial element that can improve the safety of operations. A training framework for ground handling staff containing common training elements, i.e. training types, training content and methodology should be part of the effort to strengthen the regulation of ground handling operations. The ITF believes that while operational procedures have an impact on training, training also impacts positively on staff turnover, and ultimately on the safety of operations.

### 3. CONCLUSION

3.1 In light of the above, the ITF fully supports the ongoing work in ICAO aiming to strengthen ground handling regulation and agrees with the final recommendations developed by the Secretariat in the above-mentioned working paper. It is, however, important that this work be continued as a matter of priority. This is particularly the case where pressure on operations through reduced staffing levels will increase as the industry recovers from the economic impact of the COVID-19 pandemic.

3.2 The ITF therefore strongly supports the recommendation of the Secretariat concerning “the development of Standards and Recommended Practices (SARPs) and Procedures for Air Navigation Services (PANS) related to ground handling and to launch any new initiatives necessary to strengthen the regulation of ground handling on a global basis.”

3.3 The ITF invites the Conference to encourage States to:

- a) amend Annex 9 in line with the FALP/12-WP/19, recommended practice 6.5 and also add recommended practice 6.6;
- b) develop Standards to assist States in bringing ground handling into an operator’s SMS;
- c) establish and support procedures through a positive safety culture rooted in just culture. As a result, ground handling workers therefore are able, either directly or through their trade union, voluntarily and confidentially, report safety violations and concerns

without fear of reprisal in line with all other areas of aviation safety-critical tasks. Highlighting EASA regulation EU 376/2014 as a model; and

- d) through stakeholder involvement, support the development of training for ground handling workers in the context of a holistic aviation safety framework, which enshrines a positive safety culture based on just culture principles as the framework for ground handling to contribute to the overall aviation safety ecosystem.

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