



ASSEMBLY — 40TH SESSION

TECHNICAL COMMISSION

Agenda Item 30: Other issues to be considered by the Technical Commission

**CERTIFICATION OF AIRPORT GROUND SERVICE PROVIDERS
AND PERSONNEL LICENSING**

(Presented by Saudi Arabia)

EXECUTIVE SUMMARY

The General Authority of Civil Aviation (GACA) of Saudi Arabia has developed and implemented an initial regulatory framework for the certification of ground service providers (GSP) and the licensing of their personnel.

The aim is to address the systemic pathogenies encountered in the ground handling industry and ensure the provision of safe and high level ground services, while setting a level playing field in the competition between existing and new entrants.

In the new regulatory framework:

- a) GACAR Part 151 prescribes the rules and requirements for all ground service providers to be certified by the Authority. It defines 11 core categories and 38 types of ground services which constitute the “operations specifications” for which a GSP can apply for certification; and
- b) GACAR Part 68 introduces the requirement for all persons working for a GSP to qualify for a work permit issued by the Authority. It introduces a total of 15 job functions which comprise the operational “privileges” for which candidates can apply through their sponsoring GSP.

| | |
|--------------------------------|--|
| <i>Strategic Objectives:</i> | This information paper relates to the Strategic Objectives of enhancing safety, efficiency, and the level of service (LoS) in airport and ground operations. |
| <i>Financial implications:</i> | Establishment of a new Ground Services Standards department for rulemaking and tactical oversight of the GSP industry. |
| <i>References:</i> | Doc 8335, <i>Manual of Procedures for Operations Inspection, Certification and Continued Surveillance</i> EC-96/67, Access to the Ground Handling Market at Community Airports GACAR Part 151, Issue 5, Ground Service Providers GACAR Par 68, Issue 2, Ground Services Personnel Work Permit |

1. INTRODUCTION

1.1 Background

1.1.1 Airport ground services constitute a demanding, complex and multidisciplinary operational environment where people from different backgrounds are called to seamlessly coordinate for the delivery of their final product: quality customer service, on-time performance and above all secure and safe operations.

1.1.2 Aviation safety starts on the ground yet, the domain of airport ground servicing essentially remains a “self-regulated” field in aviation. Ground services staff, who controls key safety parameters of the aircraft turnaround, is exposed to inconsistent and sometimes poor training standards, while they function under a web of disharmonized and often vague or contradicting operating procedures and rules. It doesn’t come as a surprise therefore, that aircraft ground damages remain a problematic area of concern in the Kingdom of Saudi Arabia and elsewhere in the world.

1.2 The Systemic Perils

1.2.1 The pathogenies frequently encountered in the ground handling business around the world comprise:

- subpar selection criteria and inadequate or improper training of ground services staff;
- inconsistent implementation or non-compliance with standard operating procedures;
- lack of on-site supervision;
- shortage of manpower and personnel fatigue due to excess overtime;
- ineffective internal quality control and safety oversight from ground service providers;
- unsatisfactory maintenance and serviceability of ground support equipment;
- deficient apron supervision and control from aerodrome operators;
- unjust corporate culture, where employee may be even negatively incentivized;
- limited managerial commitment and accountability; and
- incoherent communication and collaboration among key stakeholders.

1.2.2 Although some of the issues above may individually raise the probabilities of human error, when combined together they generate an exponentially increased systemic risk.

2. DISCUSSION

2.1 Formulating a GSP Regulatory Framework

2.1.1 The industry has put a significant amount of effort to harmonize ground servicing around the world, yet airlines are still reluctant to give up their own procedures and protocols. The implementation of the International Air Transport Association (IATA) Safety Audit for Ground Operations (ISAGO) program is aiming at attaining the required confidence level in the industry.

2.1.2 Moreover, many corporate decision makers may regrettably seek operational “compromises” in implementing something which is translated into additional costs or capital investment, but isn’t prescribed by a regulation.

2.1.3 Hence, the need to ensure high and consistent standards in ground operations and further safeguard the systematic oversight by the national aviation authority, implies the forging of a formal regulatory framework. Such system can be founded on five normative pillars:

- establishing the regulatory requirements and process for the certification of ground service providers;
- defining the governing framework for awarding a work permit to ground services staff relevant to their job function(s);
- delineating the practical and theoretical training specifications for all ground service functions including training material, classroom or on-the-job training (OJT) hours, and assessment criteria;
- outlining the requirements for the approval of training organizations delivering courses on ground services; and
- developing and implementing a compliance oversight system encompassing tactical audits and inspections.

2.2 Implementing GSP Certification

2.2.1 In 2016, GACA established and initiated the implementation of a formal certification framework for ground service providers and the licensing of their personnel. It comprises a set of documents including the core regulations, advisory circulars, internal procedures, and checklists (E-book), as well as the associated forms.

2.2.2 The benefits of the new regulatory framework are seen as three-fold:

- enhancing ground operations safety at all aerodromes by establishing systematic compliance oversight against the new regulatory requirements;
- setting a level playing field for new entrants to compete with incumbent service providers in view of the opening of the ground handling market and the undergoing airport expansion projects and privatization; and
- elevating the quality and level of service provided to passengers and airlines.

2.3 GACAR Part 151 - Key Elements of Ground Service Providers Certification

2.3.1 The new regulatory framework for the certification of GSP defines 11 ground service categories and 38 subcategories, while additional activities may be authorized if it is deemed in the interests of safety or enhance the quality and comprehensiveness of the services offered at an airport.

2.3.2 The technical and operational standards use as baseline the considerable ground work done by the industry and formally adopt the IATA's AHM, IGOM, ISAGO, CHM, and DGR, the JIG (Joint Inspection Group) standards for into-plane fuelling services, airport depots and hydrants, the IFSA/IFCA (International Flight Services Association/Catering Association) specifications, the HACCP (Hazard Analysis and Critical Control Points), and the World Health Organization's guidelines for hygiene, sanitation, and food safety for inflight catering services.

2.3.3 The application for certification involves the submission of ten prerequisite items. Five principal manuals are submitted for: (i) ground operations, (ii) training, (iii) quality assurance/compliance, (iv) safety management, and (v) emergency response planning. These manuals are reviewed and accepted by GACA.

2.3.4 The GSP certificate describes the operational specifications awarded to the organization for each individual ground station, i.e. the privileges, and is valid for two years unless an initially reduced period is considered.

2.3.5 The training program of the certified GSP must at least:

- cover all functions and tasks required to be performed by ground services staff relevant to the operations specifications of the GSP;
- include the training curriculum for each job function, covering all types of basic and recurrent training;
- include a reference training matrix indicating all the required training modules and frequency of recurrence for each job function;
- include the syllabus for each initial or recurrent training module indicating all topics covered;
- define the training hours required for each course/module, initial or recurrent, and the associated on-the-job (OJT)/practical training hours or number of events required to be performed; and
- cover 13 elementary training subjects on top of the theoretical, practical and OJT for the required functions and tasks relevant to the operations specifications of the GSP.

2.3.6 Certified providers appoint an “accountable executive” who has corporate authority for ensuring that all services authorized to perform in its operations specifications can be financed and carried out to the standard required by the new regulatory framework.

2.3.7 Certified providers nominate key “post-holders” responsible for the three critical management functions of: (i) operations, (ii) quality assurance/compliance, and (iii) training. The post-holders have to be accepted by GACA, enhancing the degree of accountability and allowing the regulator to directly appraise their qualifications, knowledge, and competence through a formal assessment process. GACA may also withdraw the acceptance of a post-holder if the individual:

- demonstrates a lack of willingness or ability to comply consistently with regulatory requirements and mandates;
- demonstrates a lack of knowhow and technical proficiency or a lack of the degree of care, judgment, or responsibility required of the post-holder; and
- deliberately provides inaccurate information and reports, or falsifies data and records.

2.3.8 The responsibilities of managerial, supervisory, safety, audit, and training personnel are framed, while the qualifications of instructors and auditors are defined.

2.3.9 Certified providers designate senior persons accountable for the administration and day-to-day implementation of the safety management system (SMS), as well as for the day-to-day technical maintenance and serviceability of ground support equipment (GSE).

2.3.10 Duty period limitations for operational staff are addressed. No person may be scheduled to perform duties for more than 10 hours within 24 consecutive hours, while a minimum rest period of eight hours is observed between shifts. This alleviates the excessive working hours of ground staff that has direct impact on aviation safety due to the induced fatigue on employees, and minimizes the training hours frequently lost under such circumstances.

2.3.11 The maintenance infrastructure of the ground service provider, or of its subcontracted maintenance organization, must include adequate facilities, specialized maintenance equipment and tools, sufficient and qualified technical staff, and the necessary procedures to conduct all required preventive and corrective maintenance of the ground support equipment required to perform all activities prescribed in the operations specifications of the GSP.

2.3.12 Given the local operating conditions, the service life of GSE is limited to 15 years, which is on average double the depreciation period used for heavy equipment. As the condition of equipment is always a function of its utilization, extension of the service life is provisioned given that the party concerned conducts a risk assessment for the GSE in question and obtains a service life extension recommendation from the manufacturer or a technical organization acceptable to GACA.

2.3.13 Maintenance organizations need to obtain the acceptance of GACA prior to engaging in contracts with ground service providers.

2.3.14 A dependable quality assurance/compliance (QA) system is seen as the core of a safe and well-functioning GSP. The content of the corresponding QA/compliance manual, the setup of the quality organization, and the responsibilities of the associated personnel are outlined. Non-certified providers may serve as subcontractors only under stringent conditions, operating under the quality system of the certified GSP.

2.3.15 Submission of quarterly safety reports and incident/accident statistics is introduced to address the under-reporting of occurrences.

2.4 GACAR Part 68 – Key Elements of Ground Services Personnel Work Permit

2.4.1 The regulatory framework regarding ground personnel requires all staff working for ground service providers to obtain a Work Permit for any of the 15 defined job functions.

2.4.2 The use of the word “work permit” is preferred over the word “license” to indicate that - at this stage - there is no formal written or verbal examination of the candidates by GACA that could justify the issuance of a license per se, as for other disciplines such as pilots, aircraft mechanics, etc.

2.4.3 Training records are submitted for acceptance to GACA for ensuring that the applicant has undergone the training foreseen. These records comprise documentary evidence of:

- training in the specific job function(s) according to the training requirements, guidelines, and standards prescribed in GACAR § 151.5, including the GSP’s relevant manuals, policies, operating, and contingency procedures;
- emergency response plan training at both general awareness and job function levels;
- familiarization training specific to the ground station/aerodrome(s) the applicant will be employed;
- training in all relevant GACA regulations applicable to the employer's operation and the job function(s) to be performed;
- recurrent training designed to maintain the currency of the permit holder's knowledge and skills on the functions prescribed by GACA within the preceding 24 months;
- if applicable to the applicant's functions:
 - (i) dangerous goods awareness or acceptance training;

- (ii) load control license; and
 - (iii) aerodrome driving permit and a civil driving license of a type corresponding to the vehicles or GSE operated airside.
- health and airport/safety awareness training;
 - security awareness training;
 - human factors training; and
 - ground services personnel involved in direct communication with pilots in the context of their daily duties, such as headset operators or radio operators, must provide evidence that they can read, speak, write and understand the English language and use aviation terminology at least equivalent to Level 3 of ICAO English language proficiency requirements.

2.4.4 The relevant training certificates must be issued by training organizations accepted by GACA.

2.4.5 The GSP has to assume accountability for assessing the competence of its employees and explicitly attest to the eligibility to perform their functions before releasing them to duty. This holds for all full-time, part-time, and seasonal staff.

2.4.6 The work permit has a validity of two years, for the specific airports(s) designated on it, whereby at the end of this period the corresponding sponsoring GSP has to apply for renewal on behalf of their staff, submitting any updated training certificates, licenses, and documents applicable.

3. CONCLUSION

3.1 GACA's new regulatory framework for the certification of ground service providers builds on the existing industry standards and best practices and establishes new requirements in order to augment safety and raise the quality of ground services.

3.2 The dynamic nature of aviation suggests that any framework established is continually reviewed and expanded. In this context, there is still much to be done for the successful integration and implementation of the new regulations, which are currently undergoing their sixth (Part 151) and third revision (Part 68) respectively.

3.3 GACA is working with key stakeholders on the standardization of ground services training material and requirements. This comprises the course topics and content, the minimum duration for both the theoretical and practical elements, and the length of practice under supervision. Following the completion of that, a formal examination process by GACA may be considered.

3.4 Greater attention to ground operations standards and their implementation translates into enhanced aviation safety all around.