



Brussels, January 21, 2005

## **ACI EUROPE and ETF Joint Statement on Quality, Safety and Training in the ground handling sector**

In the framework of the group of experts of the Ground Handling Sectoral Dialogue Working Group, the European Transport Workers' Federation (ETF) and Airports Council International (ACI EUROPE) agreed the following Joint Statement.

### **Quality of the service**

1. With the opening up of the market, several airport operators complained that they have lost control over the quality of handling service. Airport operators have a great responsibility and extensive liabilities to ensure an efficient management and coordination of all activities undertaken on their premises, in order to protect the interest of their users and customers. An inadequate level of ground handling services affects passengers, other airlines and the whole functioning of the airport relating to land-side (check-in desks, baggage delivery..) and air-side (transport on the ramp, maximum turnaround time...) and may lead to a loss of slots.
2. Furthermore, the image of the airport is negatively affected despite it may not provide the service concerned. The passenger will inevitably blame the airport for any service disruption experienced as a result of insufficient handling service (long check-in and boarding schedules, baggage delivery, busses, maintenance and availability of ramp equipment...).

If the Directive is revised, it should state: ***"Member States shall empower the airport operator to define, having consulted the User Committee, minimum quality standards to be applied by self-handlers and third party handlers in the provision of handling services (such as baggage delivery time/transfer time, transfer freight time, bus provision time, minimum connecting time, check-in queuing time). The airport in conjunction with the licensing authority (if the latter is different from the airport authority) shall monitor the compliance with those standards, under threat of penalties in case of continuous violation"***.

3. The minimum quality levels should be the result of a consultation with the User Committee at each airport, taking into account their specific infrastructure and capacity characteristics, which may vary from airport to airport. Such a guarantee for all the operators at the airport would not jeopardise the freedom of the airline and its supplier to define the quality of the service through contractual agreement, on condition that level complies with the pre set minima.
4. Ensuring minimum quality service would also have a direct impact on safety and security at the airport. Adequate level of the service cannot leave out of consideration the training of staff, which needs to be improved.

## Safety

5. Safety is paramount. It is compulsory and defined by ICAO regulations through IATA AHM standards. Any handling agent (airline, handler or airport) should be assessed regarding this matter. It should provide, among other things, the appropriate training measures, even before being allowed to operate. It has the responsibility to apply correctly the safety regulations and/or requirements.
6. A noted feature of the liberalisation of the ground handling market is an increased turnover in staff as the drive to cut costs has led to lower wages. This increased turnover of staff may have important safety implications. Practices such as uncontrolled sub-contracting of ground handling activities add to these safety/security concerns. When characterised by low quality level, ground handling operations may impact individual aspects of airport operations, producing a negative domino effect on other airport operations. Safety is an important item which could be clearly improved.
7. The application of the JAR-OPS is related not only to the ground and flight operations safety, but also to the overall quality level of the all services produced and consumed within the industry, since safety is only one of the dimensions/parameters of service quality.
8. ACI EUROPE and ETF look into safety problems, assessing which JAR Operations (JAR OPS), which already apply to carriers, should be extended to handlers. The Directive on ground handling services should therefore guarantee an adequate level of safety, stating **"Member States shall take appropriate measures for ensuring adequate level of safety of installations, of aircraft, of equipment and of persons for handling operations. These measures shall especially refer to internationally accepted standards such as those contained in IATA AHM standards and/or JAR-OPS"** (see Annex).
9. These measures should be ensured at level of selection procedure and in their implementation. Therefore, an appropriate system of penalties should be provided for at EU level.

## Training and qualification of staff

10. As highlighted in the annex, JAR-OPS already require special training for the staff operating luggage handling, passenger screening, security and anti-terrorism procedures. Some activities falling within the scope of the directive are already implemented by regulations (mechanics), some others have to comply with specific requirements, (petrochemicals for fuelling, health legislations for catering).
11. The JAR-OPS, currently applicable to air carriers, largely focus on training matters and may partly represent valid terms of reference.
12. However, it is useful to define the needs for training for all ground handling services according to what has been done for mechanics, (JAR 145, 147 and 66). Priority will be given to check-in agents, ramp agents, loaders, loadmasters.
13. Benchmarking may help to identify best practices and to assess the benefit of harmonising skills and training at EU level.
14. ACI and ETF recognised the importance of the social dialogue in improving the quality of services. The social dialogue can have a dynamic role in order to give a framework of the next developments. The Directive should foresee a methodology for training and qualification of staff, stating, **"Member States should encourage the research of best practices with a view to develop social dialogue on training and qualification of staff"**

## Conclusion

The European Social Partners (ACI and ETF) support a ground handling system able to capture the benefits of liberalization without compromising safety and quality of the service.

- Adequate level of safety, training and personnel qualifications aspects should be ensured at every airport. Member States shall take appropriate measures for ensuring adequate level of safety, which should especially refer to internationally accepted standards such as those contained in IATA AHM standards and/or JAR-OPS. Unions and employers' organizations should continue to work on these issues;
- However, quality of the service is a more complex issue, involving both objective and subjective parameters. At EU level, legislation should ensure that the Member State shall empower the airport operator to define, after consultation with the main parties involved, minimum quality standards to be applied by self-handlers and third party handlers. In conjunction with the competent authority providing the license for handlers, the airport operator shall monitor the compliance with those principles, under threat of penalties in case of continuous violation.
  - If quality implies costs, non-quality is associated with even higher costs, as both the internal and external costs of non-quality have been found to overwhelm the costs associated with the development and introduction of quality management systems, not to mention the gains from the productivity increase and the increased competitiveness.
  - It is essential that unions and employers should work together to improve quality, maximize efficiency and to organize training and qualification of staff. Looking for best practices and using the work done by the group of experts, ACI and ETF are committed to explore best practices with a view of strengthening training and qualification of staff.

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## JAR-OPS provisions of relevance to ground handlers' activities

1. Given the importance of the ground operations for the safety of flights, the application of several JAR-OPS provisions to the ground handling companies, along with those of JAR-145 would constitute a possible valid option for the prevention of negative consequences of the deregulation of the ground handling market on the safety of flights. In the same way, some provisions of Regulation 2407/1992 on the licensing of community air-carriers related to the financial status and state financial controls that community air-carriers have to undergo, should be applied for selecting handlers.
2. The extension of the following provisions contained in JAR-OPS 1 would further promote the harmonisation of national legislation concerning aviation and would allow for the increase of service quality and safety:

### I. JAR-OPS 1.175: General rules for Air Operator Certification

*"The operator must satisfy the Authority that; (1) Its organisation and management are suitable and properly matched to the scale and scope of the operation; and (2) Procedures for the supervision of operations have been defined. (h) The operator must have nominated an accountable manager acceptable to the Authority who has corporate authority for ensuring that all operations and maintenance activities can be financed and carried out to the standard required by the Authority. (i) The operator must have nominated post holders, acceptable to the Authority, who are responsible for the management and supervision of the following areas, (1) Flight operations; (2) The maintenance system; (3) Crew training; and (4) Ground operations.*

3. The logic of the provision contained in JAR-OPS 1.175 is that the organization and management structure of an air-carrier are related to the scale and scope of its operations, and that the procedures and the accountability system which must be established within its organization, are essential in order to ensure the safe conduction of the operations.
4. In Appendix 2 to JAR-OPS 1.175 - in which the requirements about the management and organisation of an air-carrier are prescribed - it is stated that *"... An operator contracting other organisations to provide certain services retains responsibility for the maintenance of proper standards. In such circumstances, a nominated post holder must be given the task of ensuring that any contractor employed meets the required standards ..."*. Moreover, in Appendix 2 of JAR-OPS 1.175 the requirements as to the organizational and management structure are further illustrated, mentioning explicitly that operations and ground handling job positions are to be staffed by trained individuals, making thus training a basic requirement. The organisations, which an air-carrier may be contracted with, are either other air-carriers or ground handling companies.
5. The categories of services operations listed above which may be contracted to a ground handler, are maintenance and ground operations. Those operations are essential to the overall safety of the aviation. However, the supervision by the air-carrier of the ground handler, as well as the standards that its services must

comply with cannot guarantee the fulfilment of the services in the proper manner<sup>1</sup> nor such a supervision constitutes a competent Authority's approval. The air-carriers are thus the only entities to be responsible for any breach of contract by the ground handling companies. Effectively, however, all the airport system is negatively affected.

6. Therefore, any ground handling company should ensure to the competent Authority that it meets all requirements contained in JAR-OPS 1.175 in order to be granted an approval to offer such services. Such an approval, when accompanied with the appropriate financial controls provided for in Regulation 2407/1992, would ensure that the quality of the ground handling services offered by the ground handler is not endangered by poor organisational structure or financial problems which a ground handling company may encounter as a result of increased competition. It is also common place that the competent Authority which is responsible for granting such an approval to a ground handler, must be the same with that responsible for granting an AOC to an air-carrier.
7. For the above reasons, the relevant provisions of JAR-OPS 1.175 must be extended to the ground handling industry.

## II. JAR-OPS 1.1040 General Rules for Operations Manuals

*"(a) An operator shall ensure that the Operations Manual contains all instructions and information necessary for operations personnel to perform their duties.*

*(b) An operator shall ensure that the contents of the Operations Manual, including all amendments or revisions, do not contravene the conditions contained in the Air Operator Certificate (AOC) or any applicable regulations and are acceptable to, or, where applicable, approved by, the Authority.)*

*(c) Unless otherwise approved by the Authority, or prescribed by national law, an operator must prepare the Operations Manual in the English language. In addition, an operator may translate and use that manual, or parts thereof, into another language.)*

*(d) Should it become necessary for an operator to produce new Operations Manuals or major parts/volumes thereof, he must comply with subparagraph (c) above. In all other cases, an operator must comply with sub-paragraph (c) above as soon as possible and in no case later than 1 December 2000.*

*(e) An operator may issue an Operations Manual in separate volumes.*

*(f) An operator shall ensure that all operations personnel have easy access to a copy of each part of the Operations Manual which is relevant to their duties. In addition, the operator shall supply crew members with a personal copy of, or sections from, Parts A and B of the Operations Manual as are relevant for personal study.*

*(g) An operator shall ensure that the Operations Manual is amended or revised so that the instructions and information contained therein are kept up to date. The operator shall ensure that all operations personnel are made aware of such changes that are relevant to their duties.*

*(h) Each holder of an Operations Manual, or appropriate parts of it, shall keep it up to date with the amendments or revisions supplied by the operator.*

*(i) An operator shall supply the Authority with intended amendments and revisions in advance of the effective date. When the amendment concerns any part of the Operations Manual which must be approved in accordance with JAR-OPS, this approval shall be obtained before the amendment becomes effective. When immediate amendments or*

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<sup>1</sup> This is particularly true when it comes to seasonal or ad-hoc operations, where there is not even the time for the establishment of such a supervisory structure.

revisions are required in the interest of safety, they may be published and applied immediately, provided that any approval required has been applied for.

(j) An operator shall incorporate all amendments and revisions required by the Authority.

(k) An operator must ensure that information taken from approved documents, and any amendment of such approved documentation, is correctly reflected in the Operations Manual and that the Operations Manual contains no information contrary to any approved documentation. However, this requirement does not prevent an operator from using more conservative data and procedures.

(l) An operator must ensure that the contents of the Operations Manual are presented in a form in which they can be used without difficulty.

(m) An operator may be permitted by the Authority to present the Operations Manual or parts thereof in a form other than on printed paper. In such cases, an acceptable level of accessibility, usability and reliability must be assured.

(n) The use of an abridged form of the Operations Manual does not exempt the operator from the requirements of JAR-OPS 1.130"

8. The existence of an Operations Manual is an attempt to establish a formal means of ensuring that every operation is performed according to predefined and adequate procedures in which a series of controls and accountabilities are embodied, so as to accomplish the desired level of safety and quality. An Operations Manual is an essential requirement for the air-carrier whose operations may be contracted to a ground handler. Since a ground handler must satisfy a wide variety of requirements of the air-carriers, as a result of different kinds of aircrafts and operations, it is imperative that ground handlers have their own Operations Manual, whose contents and interoperability with those of the air-carriers and the airport operator's are acceptable to, and where appropriate approved by, the same Authority responsible for granting the approval mentioned above (JAR-OPS 1.175). For the above reasons, JAR-OPS 1.1040 must extent to the ground handling industry.

### **III. JAR-OPS 1.1045 Operations Manual – structure and contents - Appendix 1 to JAR-OPS 1.1045 Operations Manual Contents**

(a) An operator shall ensure that the main structure of the Operations Manual is as follows:

**Part A. General-Basic**

This part shall comprise all non type-related operational policies, instructions and procedures needed for a safe operation.

**Part B. Aeroplane Operating Matters**

This part shall comprise all type-related instructions and procedures needed for a safe operation. It shall take account of any differences between types, variants or individual aeroplanes used by the operator.

**Part C. Route and Aerodrome Instructions and Information**

This part shall comprise all instructions and information needed for the area of operation.

**Part D. Training**

This part shall comprise all training instructions for personnel required for a safe operation.

(b) An operator shall ensure that the contents of the Operations Manual are in accordance with Appendix 1 to JAR-OPS 1.1045 and relevant to the area and type of operation.

(c) An operator shall ensure that the detailed structure of the Operations Manual is acceptable to the Authority.."

9. This provision examines into further detail the contents of the Operations Manual, which in turn are further illustrated in Appendix 1 to JAR-OPS 1.1045. The content of Part A of the Operations Manual must include areas such as organisation and responsibilities, operational control and supervision, quality system, qualifications

requirements, operating procedures, dangerous goods and weapons handling policy, security, handling and notification of occurrences etc. Part B deals with airplane and covers topics such as general information and measurement units, aircraft limitations, normal abnormal and emergency procedures, airplane performance, flight planning, mass and balance, etc. Finally, Part C concerns route and aerodrome instructions and information, while Part D is devoted to training issues.

10. As already stated above, the need for an Operations Manual for a ground handling company is beyond every reasonable doubt. Furthermore, given the nature of ground handling activities and that most of the abovementioned areas of activities are either wholly performed by the ground handling companies, or at least constitute a major input to ground handling company's everyday operations, we deem that the structure and contents of such an Operations Manual should be those prescribed in Appendix 1 to JAR-OPS 1.1045.
11. Therefore, the provisions of JAR-OPS 1.1.045 and its Appendix 1 should be made applicable to the ground handlers.

#### **IV. JAR-OPS 1.035 Quality System**

*"...(a) An operator shall establish one Quality System and designate one Quality Manager to monitor compliance with, and the adequacy of, procedures required to ensure safe operational practices and airworthy aeroplanes. Compliance monitoring must include a feed-back system to the Accountable Manager to ensure corrective action as necessary.*

*(b) The Quality System must include a Quality Assurance Programme that contains procedures designed to verify that all operations are conducted in accordance with all applicable requirements, standards and procedures..."*

12. The establishment of a quality system according to JAR-OPS 1.035 has become a prerequisite for the granting of an AOC. The importance of the quality system as such, and its contribution to safe operations provided by an air-operator is widely recognized.
13. Since this provision covers all kinds of activities (maintenance, ground and flight operations), it would be illogic to restrict its application only to the activities conducted by the air-carriers as self-handlers. Therefore, the provision at issue should be extended to the ground handlers, on the ground that their exclusive area of activity covers only the ground operations and maintenance needs of air-carriers.
14. Therefore, the application of JAR-OPS 1.035 must be extended to ground handlers.

#### **V. JAR-OPS 1.037 Accident prevention and flight safety programme**

*"(a) An operator shall establish an accident prevention and flight safety programme, which may be integrated with the Quality System, including: (1) Programmes to achieve and maintain risk awareness by all persons involved in operations; and [(2) An occurrence reporting scheme to enable the collation and assessment of relevant incident and accident reports in order to identify adverse trends or to address deficiencies in the interests of flight safety. The scheme shall protect the identity of the reporter and include the possibility that reports may be submitted anonymously; and] [(3)] Evaluation of relevant information relating to incidents and accidents and the promulgation of related information[, but not the attribution of blame; and] [(4) The appointment of a person accountable for managing the programme.]*

*[(b) Proposals for corrective action resulting from the accident prevention and flight safety programme shall be the responsibility of the person accountable for managing the programme.*

*(c) The effectiveness of changes resulting from proposals for corrective action identified by the accident and flight safety programme shall be monitored by the Quality Manager.]”*

15. Ramp operations "...hold the key to overall safety level as unsafe operations may lead quickly to tragedy and millions of dollars in losses..." (Enders 1993). In the early 90's the overall ramp accident rate had been 1 for every 980 departures, while the number of ramp incidents and accidents is expected to be rising - as opposed to the decreasing course of aircraft accidents per se - mainly due to the human factor<sup>2</sup> (Dell 1994 ; Fewings 1995; Champerling at all, 1996). Irrespectively of the reasons causing this situation the fact remains that "... the airport ramp is probably the largest source of accidents in aviation ..." (Braithwaite 2002).
16. On average, direct costs account to \$75,000 per accident, involving repairs, crew wages, passenger fares, aircraft rescheduling and/or chartering. Only in 2000, worldwide, the costs of FOD related ramp accidents were \$2,000,000,000. Indirect costs involve loss of productivity, revenues, reputation and goodwill which are estimated to be 5 to 10 times more than direct costs (Braithwaite 2002). While the relevant literature does not contain similar figures for airports, they are undeniably equally interested in this issue, because accidents may reduce airport capacity for short or even medium time periods, while they may also involve airport personnel or infrastructure with significant consequences for the operation of the airport.
17. It is imperative to state that the above ground handling costs (internal and external) are directly connected to the level of service quality, which reflects the organisational structure, operational efficiency and management techniques employed by both the ground handlers and the airport operator.
18. For the above reasons and for reasons related to the implementation of Community Directive 2003/42 on the reposting of incidents in civil aviation that the application of AR-OPS 1.037 must be extended to ground handlers.

## **VI. JAR-OPS 1.1065 Document storage periods (see also Appendix 1 to JAR-OPS 1.1065)**

*"An operator shall ensure that all records and all relevant operational and technical information for each individual flight, are stored for the periods prescribed in Appendix 1 to JAR-OPS 1.1065".*

19. The largest part of the information to be stored is prepared by or directly related to ground handler's operations (i.e. preparation of a flight, dangerous goods handling), or is related to personnel training and/or qualifications. Therefore, it is necessary to extend the application of this provision to the ground handling industry.

## **VII. JAR-OPS 1.260 - Carriage of Persons with Reduced Mobility (see also Appendix 1 to JAR-OPS 1.1045)**

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<sup>2</sup> For instance, the number of pushback related accidents worldwide in the period 1989-1992 was almost equal to the number of accidents in the period 1964-1988.



*"(a) An operator shall establish procedures for the carriage of Persons with Reduced Mobility (PRMs).*

*(b) An operator shall ensure that PRMs are not allocated, nor occupy, seats where their presence could: (1) Impede the crew in their duties;(2) Obstruct access to emergency equipment; or (3) Impede the emergency evacuation of the aeroplane.*

*(c) The commander must be notified when PRMs are to be carried on board."*

According to the above provisions (which are also related to JAR-OPS 1.1045), the handling process of PRMs is related not only to the quality and safety level PRMs receive, but also to the safety of other passengers. Since the handling processes to which reference is made above, may be conducted by the ground handlers, JAR-OPS 1.260 must be applied to the ground handlers<sup>3</sup>.

### **VIII. JAR-OPS 1.265 - Carriage of inadmissible passengers, deportees or persons in custody (see also Appendix 1 to JAR-OPS 1.1045)**

*"An operator shall establish procedures for the transportation of inadmissible passengers, deportees or persons in custody to ensure the safety of the aeroplane and its occupants. The commander must be notified when the above-mentioned persons are to be carried on board."*

20. For the same reasons mentioned in point VII, the handing of these particular categories of passengers is conducted by the ground handlers, and thus the application of this particular provision must be extended to ground handlers.

### **IX. JAR-OPS 1.270 - Stowage of baggage and cargo**

*"(a) An operator shall establish procedures to ensure that only such hand baggage is taken into the passenger cabin as can be adequately and securely stowed...."*

21. Since this provision is implemented during the passenger check-in, a service category provided for by the ground handlers, JAR-OPS 1.270 should apply to ground handlers.

### **X. JAR-OPS 1.280 - Passenger seating (see also Appendix 1 to JAR-OPS 1.1045 and Appendix 1 to JAR-OPS 1.1005)**

*"An operator shall establish procedures to ensure that passengers are seated where, in the event that an emergency evacuation is required, they may best assist and not hinder evacuation from the aeroplane."*

22. This provision, along with those requirements related to the PRMs as well as those relevant to the aircraft mass and balance, are meant to be fulfilled during the check-in and the seat allocation processes of the passengers. Since check-in services are provided by the ground handlers, the application of JAR-OPS 1.280 must be extended to ground handlers.

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<sup>3</sup> It must be stated that the issue of PRMs is contained in both JAR-OPS 1.260 (SUBPART D-OPERATIONAL PROCEDURES of JAR-OPS 1) and in JAR-OPS 1.1045 (Operations Manual). Although PRMs are mentioned, in the same sentence, along with another 2 categories of passengers (children and sick passengers) in JAR-OPS 1.045, there is no specific provision, such as for JAR-OPS 1.260, for these two passenger categories.

**XI. JAR-OPS 1.305 - Refuelling/defuelling with passengers embarking, on board or disembarking (see also Appendix 1 to JAR-OPS 1.305 and Appendix 1 to JAR-OPS 1.1045)**

*"An operator shall ensure that no airplane is refuelled/defuelled with Avgas or wide cut type fuel (e.g. Jet-B or equivalent) or when a mixture of these types of fuel might occur, when passengers are embarking, on board or disembarking. In all other cases necessary precautions must be taken and the airplane must be properly manned by qualified personnel ready to initiate and direct an evacuation of the airplane by the most practical and expeditious means available."*

23. The above provision requires an air-carrier to make sure that the ground handler will perform the refueling of the aircraft in a predefined and safe manner. Furthermore, the requirement contained in Appendix 1 to JAR-OPS 1.1.045 for the establishment of fuelling procedures<sup>4</sup> further unveils that all provisions related to the fuelling/defuelling of the aircraft are actually provisions that ground handlers have to comply with. After all, it would be absolutely irrational to require an air-carrier (practically not involved in the refueling process) to comply with certain requirements without applying the same requirements to the ground handler who is actually refueling the aircraft.

24. For these reasons, JAR-OPS 1305 must be applicable to ground handlers as well.

**XII. JAR-OPS 1.307 Refuelling/Defuelling with wide-cut fuel**

*An operator shall establish procedures for refuelling/defuelling with wide-cut fuel (e.g. Jet-Bor equivalent) if this is required.*

Same as JAR-OPS 1.305

**XIII. JAR-OPS 1.345 - Ice and other contaminants- [ground procedures] (see also Appendix 1 to 1.1.045)**

*"(a) An operator shall establish procedures to be followed when ground de-icing and anti-icing and related inspections of the aeroplane(s) are necessary..."*

25. This requirement is related to the de-icing/anti-icing processes which are exclusively conducted by the ground handlers. It is therefore necessary that this provision which is further analysed in JAR-OPS 1.1045<sup>5</sup> is extended to the ground handling industry.

**XIV. SUBPART J – MASS AND BALANCE**

<sup>4</sup> "..... A description of fuelling procedures, including:

(a) Safety precautions during refuelling and defuelling including when an APU is in operation or when a turbine engine is running and the prop-brakes are on;

(b) Refuelling and defuelling when passengers are embarking, on board or disembarking; and

(c) Precautions to be taken to avoid mixing fuels".

<sup>5</sup> "A description of the de-icing and anti-icing policy and procedures for aeroplanes on the ground. These shall include descriptions of the types and effects of icing and other contaminants on aeroplanes whilst stationary, during ground movements and during take-off. In addition, a description of the fluid types used must be given including:

(a) Proprietary or commercial names;

(b) Characteristics;

(c) Effects on aeroplane performance;

(d) Hold-over times; and

(e) Precautions during usage."

**JAR-OPS 1.605 General**

**Appendix 1 to JAR-OPS 1.605 Mass and Balance – General**

**JAR-OPS 1.607 Terminology**

**JAR-OPS 1.610 Loading, mass and balance**

**JAR-OPS 1.615 Mass values for crew**

**JAR-OPS 1.620 Mass values for passengers and baggage**

**Appendix 1 to JAR-OPS 1.620(g) Procedure for establishing revised standard mass values for passengers and baggage**

**JAR-OPS 1.625 Mass and balance documentation**

**Appendix 1 to JAR-OPS 1.625 Mass and Balance Documentation**

26. As shown by the title, the whole Subpart J is devoted to the mass and balance of the aircraft, which constitutes a very important parameter for the safety of flights. The application of all procedures and principles contained in this Subpart is a task performed solely by the ground handlers. It is therefore imperative that the whole of this Subpart is extended to the ground handling industry.

**XV. SUBPART R - (TRANSPORT OF DANGEROUS GOODS BY AIR)**

Since the handling of dangerous goods is performed by the ground handlers, all JAR-OPS contained in SUBPART R must apply to ground handlers (see below for training on ground handling of dangerous goods).

**XVI. Other relevant recommendations**

JAR-OPS 1.065 (Carriage of weapons of war and munitions of war).

JAR-OPS 1.070 (Carriage of sporting weapons and munitions).

JAR-OPS 1.205 (Competence of operations personnel. - The operator shall ensure that all personnel assigned to, or directly involved in, ground and flight operations are properly instructed, have demonstrated their abilities in their particular duties and are aware of their responsibilities and the relationship of such duties to the operation as a whole).

JAR-OPS 1.1235 (Security requirements. - The operator shall ensure that all appropriate personnel are familiar, and comply, with the relevant requirements of the national security programmes of the State of the operator.).

## **Training issues**

27. As experience has shown and as it is illustrated in JAR-OPS, the issue of training is of major importance for the achievement of safety in the aviation industry. As far as ground handling is concerned, all functions contained within its context must be performed by trained personnel.

As specified in JAR-OPS 1.1045, part D of the Operations Manual must contain "Training syllabi and checking programmes for all operations personnel assigned to operational duties in connection with the preparation and/or conduct of a flight.  
2 Training syllabi and checking programmes must include: ..... 2.2 For cabin crew. All relevant items prescribed in Subpart O; 2.3 For operations personnel concerned, including crew members:(a) All relevant items prescribed in Subpart R (Transport of Dangerous Goods by Air); and (b) All relevant items prescribed in Subpart S (Security).  
2.4 For operations personnel other than crew members (e.g. despatcher, handling personnel etc.). All other relevant items prescribed in JAR-OPS pertaining to their duties.  
3 Procedures 3.1 Procedures for training and checking. 3.2 Procedures to be applied in the event that personnel do not achieve or maintain the required standards. 3.3 Procedures to ensure that abnormal or emergency situations requiring the application of part or all of abnormal or emergency procedures and simulation of IMC by artificial means, are not simulated during commercial air transportation flights.  
4 Description of documentation to be stored and storage periods"

28. The training that ground handling personnel must receive and for which there direct provisions exist in JAR-OPS 1 covers the following areas:

- Transport of Dangerous Goods by Air. The areas of training that the staff must undergo are presented in JAR-OPS 1.1220.
- Security (all JAR-OPS contained in SUBPART S, from 1.1235 up to 1.1255).

As far as personnel employed in the landside passenger handling are concerned, they should undergo part of the training foreseen for cabin crew, contained in Appendix 1 to JAR-OPS 1.1005 relevant to passenger handling. Such a training necessary for the proper implementation of other provisions contained in different provisions of JAR-OPS (e.g. recognition of people whose boarding onto the aeroplane may be denied on safety reasons).

However, as it is clearly stated in paragraph 2.4 of JAR-OPS 1.1.045 (see above) all operations personnel must be trained for all other items which are relevant to their tasks. Therefore, the use of IATA AHM, or any equivalent manual, could serve as a basis for the establishment (by the expert's group) of all other areas of training required.

Therefore, all ground handling personnel must undergo the systematic training that JAR-OPS provide for. These training requirements constitute the minima training requirements that should be applied at E.U. level. In this way, a common training ground for all personnel employed in the European ground handling industry will be established.

As to the mentioned minima qualifications, bearing in mind possible existing differentiations in national legal systems, Member States should proceed to the establishment of common requirements concerning the qualification of certain categories of ground handling personnel.