



Mr. Michael Whitaker

Administrator

Federal Aviation Administration (FAA)

Brussels, 17/11/2023

Dear Mr. Whitaker,

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Subject: Importance of Ground Handling to a Safe Air Transport System, and Request for a Meeting Between the FAA and ASA

On behalf of the Airport Services Association (ASA), headquartered in Switzerland and representing close to 70 aviation services companies from all over the world, including several which operate in the United States, please allow me to congratulate you on your recent nomination at the helm of the FAA.

We understand that there is a long list of essential priorities that await you and the Administration in the coming weeks and months in order to continue to provide the safest and most efficient aerospace system in the world, and we also know that ground handling isn't generally considered as one of them as the sector falls outside of the FAA's mandate. There are nonetheless several recent developments pertaining to ground handling that we do believe have a direct impact on the safety of air transport in the U.S.

Indeed, with the sudden rebound of the traffic post-Covid, our members all over the world have been faced with the conundrum of having to cope with what was later called the great resignation, annual staff turnover of sometimes up to 80% of their entire workforce (per annum), and airlines' aggressive schedules and turnaround times (20mn has become the norm for national/regional flights). Whilst ground handlers are used to juggle with pressure from their airline customers, the combination of the above factors coupled with the difficulty to attract new skills and the duration to badge new employees has led to an unprecedented situation and, very much to our dismay, even to several lethal accidents in the U.S. in the last two years.

The mechanisms that led to these tragic events is very well described in an article from the Wall Street Journal which I take the liberty of quoting (<https://www.wsj.com/business/airlines/airport-ground-workers-safety-airlines-c98e3216>). Nothing in the current context allows us to hope there will be a significant change as these mechanisms are deeply ingrained in the system. Airlines are responsible for the oversight of their providers, including ground handling, and in the absence of a general legal framework, it is to be feared similar accidents will continue to occur. With consequences for the safety of airlines too. Beyond the human tragedies, IATA estimates that direct damages to the airlines from ramp workers cost their members up to 4bn \$ every year. This is probably a gross underestimation; for fear of losing their jobs, many incidents (e.g. ground service equipment touching an aircraft, even slightly) remain unreported by the perpetrators on the ground.

But this doesn't need to be so. Conscious of the key importance of ground handling activities on the whole air transport sector and its safety, a few authorities around the world have started taking measures to include ground handling in their overall oversight. This is the case of the European Union (EU) for instance, where an obligation of declaration pertaining to all ground handling companies operating in the EU will be applied when the regulation comes into force, probably by Q1 2025. The EASA considers, in its Basic Regulation of 2018¹ establishing the Agency's mandate, that a safe air transport

¹ REGULATION (EU) 2018/1139 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency (<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R1139>)



system must be predicated on, amongst other things, a safe and as much as possible standard ground handling service. There are other examples around the world.

Whether these examples will prompt ICAO to examine the release of specific SARPs is too early to say, but it has recently shown signs of taking the matter quite seriously, first through the release of a document that provides guidance to ground handling companies on adopting a Safety Management System (Doc. 10121)² and then by establishing, under the Air Navigation Commission (ANC/ADOP), a Ground Handling Task Force.

In a nutshell, what the ground handling industry needs, and ultimately what the air transport system needs, is a common standard that is applied across the board. There are currently industry standards, but their implementation, outside of any regulatory framework, proves to be very cumbersome.

We solicit a moment in your very busy schedule to allow us to discuss the matter further with you, and identify those aspects within ground handling activities that may help improve the overall safety of the air transport system in the U.S. Not all of them will fall under the scope of the FAA obviously, but all of them have repercussions on matters within its mandate. By “we”, it is meant here the members of the ASA Supervisory Board³ and the undersigned.

I look forward to hearing from you soon.

Yours sincerely,

Fabio Gamba
Director General
Airport Services Association (ASA)

² ICAO Doc. 10121, Manual on Ground Handling, First Ed. 2019, <https://store.icao.int/en/manual-on-ground-handling-doc-10121>

³ Composed of the following Governors: Messrs. Atilla Korkmazoğlu, CEO of Çelebi, Jared Azcuy, CEO of Alliance Ground International (AGI), Steve Allen, CEO of dnata, Hassan El Houry, Chairman of Menzies Aviation, and Warwick Brady, CEO of Swissport. Together, these companies represent 165,000 employees worldwide. Four out of five are either based, or operate, in the U.S.