



**Isle of Man**  
CIVIL AVIATION ADMINISTRATION

# GROUND HANDLING CP8 POLICY

## Consultation Response

24 March 2025



## Background

The Isle of Man Civil Aviation Administration (IOM CAA), a division of the Department for Enterprise, is the aviation safety and security regulator for the Isle of Man and is also responsible for ensuring the Island's aviation regulation meets International Civil Aviation Organisation (ICAO) Standards and Recommended Practices and other relevant aviation standards.

The consultation on proposal is to develop aviation safety policy for ground handling in the Isle of Man.

'Ground handling' are the services necessary for an aircraft's arrival at, and departure from, an airport, other than air traffic services. These services are a fundamental part of modern aviation and make up a significant degree of activity at a certified aerodrome.

The proposed Isle of Man policy and guidance aims to:

- establish the Isle of Man's scope of and criteria for the safety oversight of ground handling services;
- establish the baseline aviation safety standards for ground handling services;
- promote the use of scalable management systems proportionate to the size and complexity of the operation;
- acknowledge the continued use of current industry standards.

The consultation was open for a period of six weeks from 6 January 2025 to 16 February 2025.

It was considered that the proposals would affect Ground Handling Service Providers (GHSP) at Certified Aerodromes, as well as users of ground handling services involved in the Island's aviation industry.

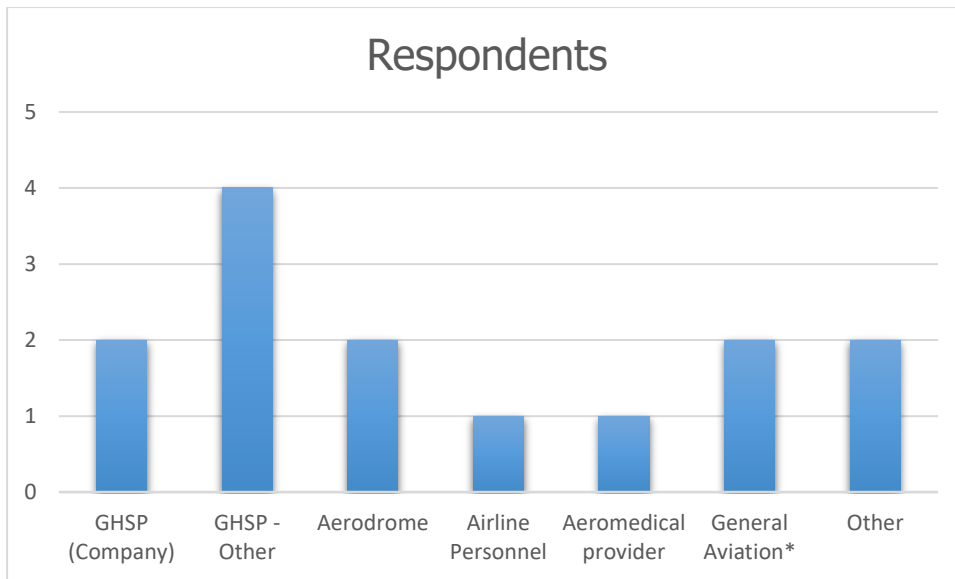
## Responses

All responses to this consultation have been recorded and analysed.

All of the 21 responses received were broadly supportive of the proposals and respondents generally agreed with the rationale behind them.

7 responses were not included in further analysis due to the provided answers not being within scope of the consultation.

Respondents were asked to provide a category that best described their interest in the consultation. The results can be found in the table:



## 1. Definition of 'Ground handling service'

12 respondents agreed with the definition of ground handling service. 2 respondents disagreed but did not provide any comment as to why.

Some respondents felt that the definition needed to be added to in order to improve clarity.

One respondent commented that oil replenishment is the duty of the aircraft operator's maintenance personnel as is the charging/deliberate discharging of aircraft batteries.

### IOM CAA comments

IOM CAA acknowledges that key stakeholders which provide ground handling services may also provide a wide range of services and facilities which will not be covered by the proposed scope of ground handling services. The responses have been reviewed, and the following additions will be made:

- an addition of 'crew transportation' to be added to the definition of 'passenger handling';
- explicit reference is to be made to the Airport Emergency Response Plan Manual;
- oil replenishment is to be excluded when conducted by an approved maintenance organisation.

Charging or deliberate discharging of an aircraft battery without removing it from the aircraft shall be retained as an equivalent to traditional refuelling and defueling.

Further examples being added to the definition could be constraining and therefore have not been included.

## **2. Definition of 'ground handling service provider (GHSP)'**

A majority of respondents agreed with the definition of GHSP. One respondent felt that the definition could benefit from additional details and made suggestions on how it could be improved.

There was a singular disagreement to the definition of GHSP which provided no further comment.

### **IOM CAA comments**

IOM CAA has reviewed the suggestions provided and have undertaken further discussion with respondents that requested additional details to be added.

IOM CAA will develop guidance material on the following:

- third parties/sub-contracting;
- joint ventures/partnerships;
- leasing and operation of GSE.

## **3. Applicability of CP8 policy**

One comment was made disagreeing with the scoping out of flight dispatchers.

### **IOM CAA comments**

Flight dispatcher is defined in Regulation (EU) 965/2012<sup>1</sup> and ICAO Annex 6 to the Chicago Convention<sup>2</sup> where the flight dispatcher function is considered a typical flight operations function, with little to no connection to ground handling activities e.g. flight planning, fuel calculations.

European Union Aviation Safety Agency have excluded flight dispatcher from ground handling regulation.

No change will be made to the applicability of the policy.

## **4. Implementation of a safety management system (SMS) by GHSP**

There was a general agreement for GHSP to implement a SMS and that this reflects best practice. Some concern was shared over the expense to the GHSP but that this was balanced with the GHSP SMS requirement being proportional to the size of the organisation.

2 respondents disagreed with the requirement for SMS but provided no feedback in support of their response.

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<sup>1</sup> Commission Regulation (EU) 965/12, OJ L 296, 25.10.2012

<sup>2</sup> The Convention on International Civil Aviation - 1944

## **IOM CAA comments**

IOM CAA will not be making any changes to the requirement for SMS.

## **5. Need for a ground handling manual (GHM) by GHSP**

A majority of respondents agreed on the implementation of a GHM. There was 1 disagreement without providing comment.

## **IOM CAA comments**

IOM CAA will not be making changes to the requirement for a GHM.

## **6. Responsibility of the GHSP**

A significant majority of respondents agreed that GHSP are to have the means necessary to ensure safe provision of service at the aerodrome, compliance to the aerodrome manual, and operation and maintenance of ground support equipment.

There was unanimous agreement that GHSP provide services in accordance with the air operators procedures and instructions, proposals on qualifications and training of staff, and personnel fitness to practice.

### Aerodrome procedures

On providing services in accordance with operator's procedures there were positive comments received such as:

"Necessary for staff to understand requirements and standards to be delivered and held accountable to. Improves safety."

Some additions to the responsibilities were suggested around training on the certified aerodromes procedures, auditing, and complying with aerodrome procedures during emergency situations.

### Aircraft operator procedures

One respondent raised concern around when aircraft operator instructions conflict with that of the aerodrome operator and it would be beneficial to have in the policy a system for resolving this discrepancy.

### Operation and maintenance of ground support equipment

Suggestion was made on including requirement for digitally accessible manuals to improve accessibility and compliance. It was also considered that it would be beneficial to combine the manuals into an integrated management system.

### Training and qualification of staff

Comment included adding specification for frequency of training and subject matters, standards for assessment, methods of assessment, and requirements for record keeping.

### Personnel fitness to undertake duties

One respondent asked whether guidance can be included on the methods to be used for the assessment of personnel being physically and mentally fit to execute their functions.

It was suggested that the IOM CAA make specific policy on substance abuse and testing.

There was comment that personnel conducting ground handling are often employed in shift work and therefore, in line with other aviation functions, a fatigue risk management system would be beneficial to safety.

## **IOM CAA comments**

### Aerodrome procedures

IOM CAA will be including explicit reference to the Airport Emergency Response Plan Manual in the definition of ground handling services to bring into scope (see response '1. Definition of ground handling service').

IOM CAA feel requirements for training personnel is adequately covered and can be found in CP8 4.1(g). The broad requirement is intended to encompass bespoke training to the aerodrome manual which can be coordinated between the GHSP and the certified aerodrome.

### Aircraft operator procedures

The concern around conflicting procedures has been reviewed by IOM CAA. It is felt that this is an important aspect of the day-to-day ground handling operation that primarily must be addressed by the GHSP and ideally resolved between the GHSP, aerodrome operator and air operator.

### Operation and maintenance of ground support equipment

IOM CAA are not wishing to make digitisation of manuals a requirement at present however where a GHSP decides to use digital manuals this would meet the requirement.

IOM CAA are to make an amendment to CP8 4.1(a) to allow an integrated SMS and GHM.

### Training and qualification of staff

IOM CAA has reviewed provisions proposed by EASA and the United Kingdom and it was found that they are not planning on implementing prescriptive detail for training

and assessment but found their proposed requirements are consistent with the overarching requirements made in this policy. Therefore, IOM CAA will not be adopting the suggested changes at present but will be reviewing the rollout of ground handling regulation globally and adapt as necessary to maintain parity.

#### Personnel fitness to undertake duties

Regarding the assessment of personnel fitness to practice, IOM CAA have considered this and feel at this stage it inappropriate to specify exact methods; however, it is an expectation that the adoption of industry standards by the GHSP will provide the guidance required for fitness assessment.

IOM CAA will not be providing explicit guidance on testing for substances (including alcohol) but having reviewed will be looking to incorporate a provision that creates parity with EASA ORGH.GEN.170 on psychoactive substances and medicines<sup>3</sup>.

In response to the suggestions on fatigue risk management an addition is to be made to 4.1 of the policy.

## **7. Responsibility of Aerodrome Operators**

Aerodrome operators already have obligations to identify hazards and mitigate safety risks in aerodrome operations. A significant majority of respondents agreed to the proposal on aerodrome operators taking account of the applicability of the policy on particular flights and the regulated/unregulated status of the GHSP when establishing and allocating apron and stand utilisation and managing apron safety risks.

### **IOM CAA comments**

IOM CAA will not be making changes to this requirement.

## **8. Industry Standards**

GHSP identified the following industry standards being in use:

- International Air Transport Association (IATA) Ground Operations Manual;
- IATA Airport Handling Manual;
- IATA Cargo Handling Manual;
- IATA Dangerous Goods Regulations;
- International Business Aviation Council (IBAC) International Standard for Business Aircraft Handlers (IS-BAH).

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<sup>3</sup> Annex 1 to EASA Opinion No 01/2024

## **9. Mandatory Occurrence Reporting**

It was felt that the mandatory occurrence reporting requirement was a positive move.

It was requested that IOM CAA provide clarification of the transparency and integration between the reporting systems used by the certified aerodrome and the GHSP.

Consideration was requested on training requirements and the support IOM CAA could provide to GHSP. There was also request for the feedback of occurrence reporting data and trend analysis.

### **IOM CAA comments**

IOM CAA has reviewed the responses and noted comment. It is planned for an amendment to be made to existing legislation to bring ground handling into scope of reporting requirements.

IOM CAA will update CAA Publication 7 as necessary and work with GHSP to support the efficient integration of occurrence reporting.

IOM CAA will also provide data trends and risk management actions.

## **10. Implementation timeline**

Respondents were asked if they agreed with the suggested 3-month implementation timeline. 50% agreed. 22% felt that more time was needed.

### **IOM CAA comments**

Following further consideration IOM CAA has decided that the implementation period will be extended to 6 months.

## **11. Oversight Activity**

There was unanimous agreement on the suggested oversight activity.

In addition, comment was made on providing clarity on the audit process and method for communicating analysed safety information (outcomes).

### **IOM CAA comments**

IOM CAA has an established audit process currently utilised for other sectors of aviation oversight. It is intended that this process will be employed for ground handling oversight. To provide clear guidance IOM CAA intends to add a section on 'audit process' to the policy.



It is the IOM CAA standard process to share anonymised safety trend and lessons learned from our oversight activities with other service providers and this will be the same for ground handling.

## Contact

Please submit any questions or comments on the content of this document by email to [caa@gov.im](mailto:caa@gov.im) or alternatively by post to:

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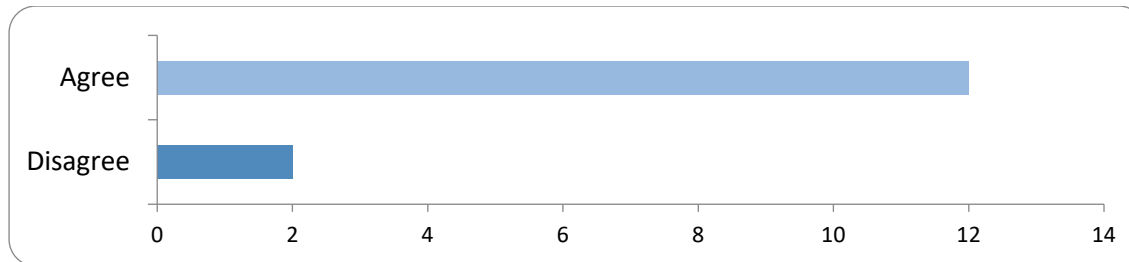
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# Responses Received

## Do you agree with the proposed definition for 'Ground handling service'?

### Agree/disagree

There were 14 responses to this part of the question.

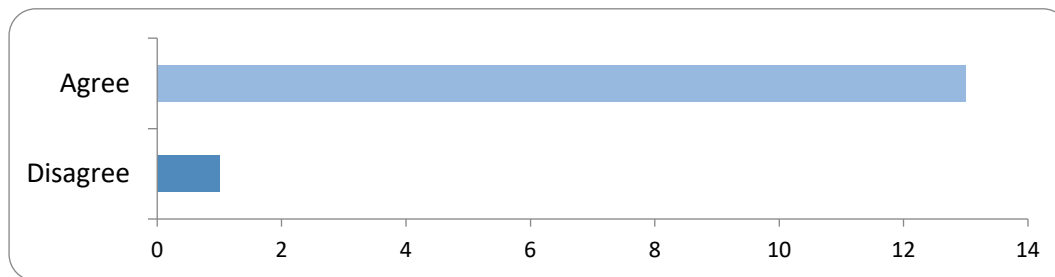


Option	Total	Percent
Agree	12	86%
Disagree	2	14%
Not Answered	0	0%

## Do you agree with the proposed definition for 'Ground handling service provider'?

### Agree/disagree

There were 14 responses to this part of the question.

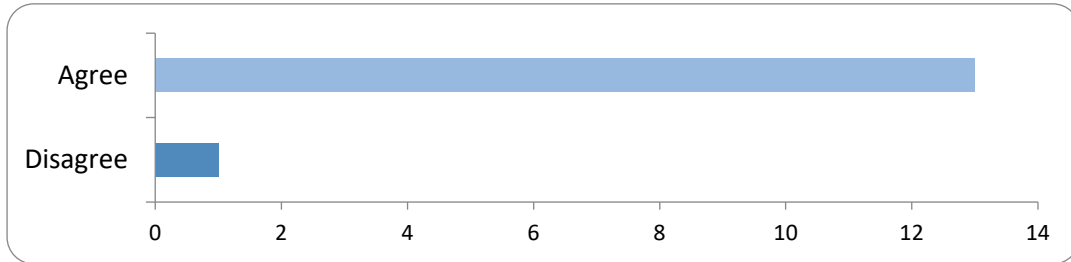


Option	Total	Percent
Agree	13	93%
Disagree	1	7%
Not Answered	0	0%

## Do you agree with the proposed applicability of CP8?

### Agree/disagree

There were 14 responses to this part of the question.

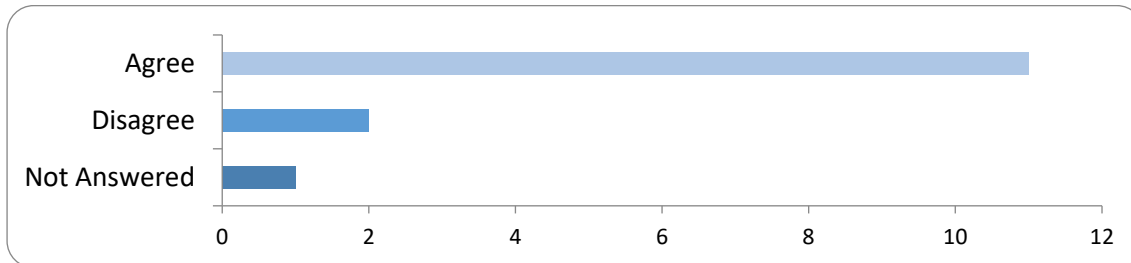


Option	Total	Percent
Agree	13	93%
Disagree	1	7%
Not Answered	0	0%

## Do you agree with the proposal for GHSP to implement a safety management system?

### Agree/disagree

There were 13 responses to this part of the question.

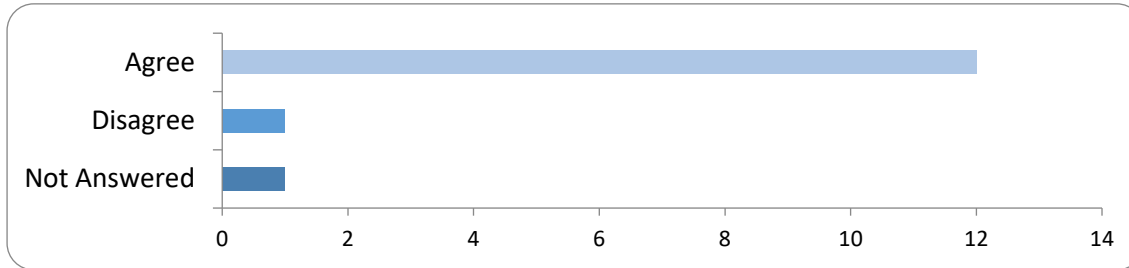


Option	Total	Percent
Agree	11	79%
Disagree	2	14%
Not Answered	1	7%

## Do you agree with the need for a ground handling service manual?

### Agree/disagree

There were 13 responses to this part of the question.

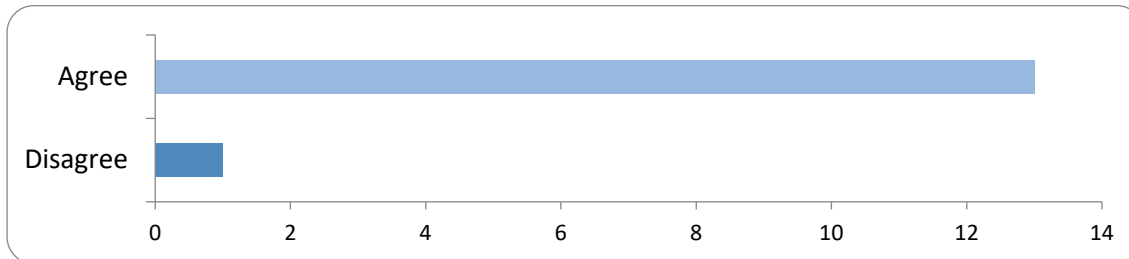


Option	Total	Percent
Agree	12	86%
Disagree	1	7%
Not Answered	1	7%

## Do you agree with the proposal for GHSP to ensure safe provision of service?

### Agree/disagree

There were 14 responses to this part of the question.

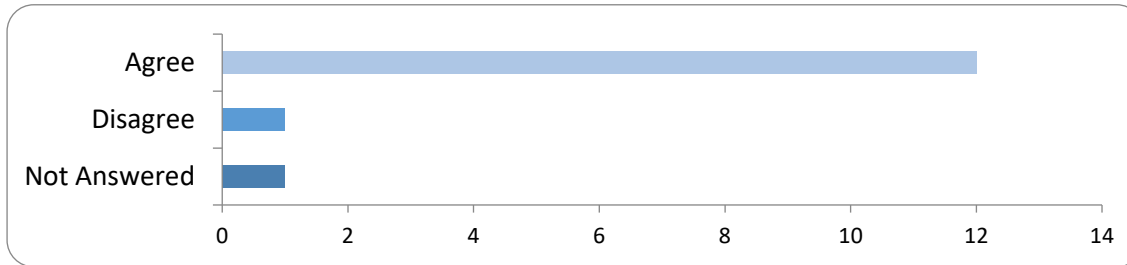


Option	Total	Percent
Agree	13	93%
Disagree	1	7%
Not Answered	0	0%

## Do you agree with the proposal for GHSP to ensure compliance with the certified aerodrome's Aerodrome Manual?

### Agree/disagree

There were 13 responses to this part of the question.

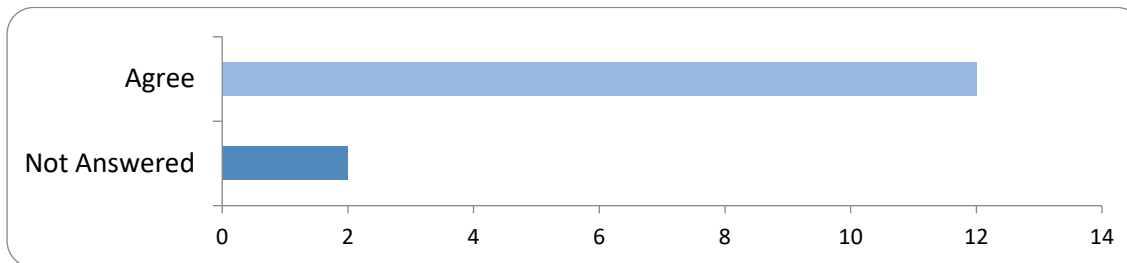


Option	Total	Percent
Agree	12	86%
Disagree	1	7%
Not Answered	1	7%

## Do you agree with that the GHSP must ensure that it provides service in accordance with the air operator procedures and instructions?

### Agree/disagree

There were 12 responses to this part of the question.

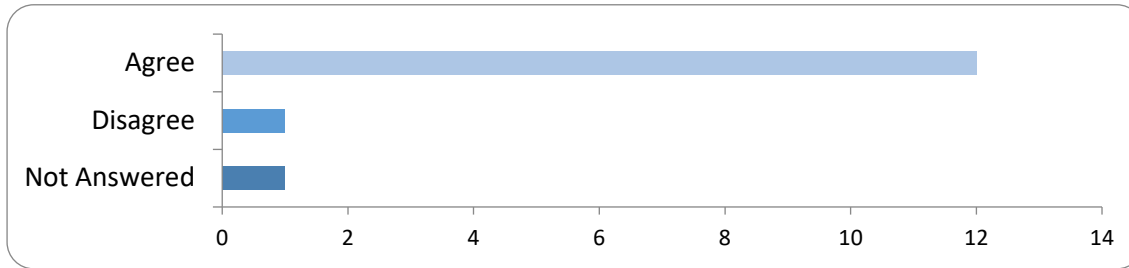


Option	Total	Percent
Agree	12	86%
Disagree	0	0%
Not Answered	2	14%

## Do you agree with the proposal on manuals for the operation and maintenance of ground handling equipment?

### Agree/disagree

There were 13 responses to this part of the question.

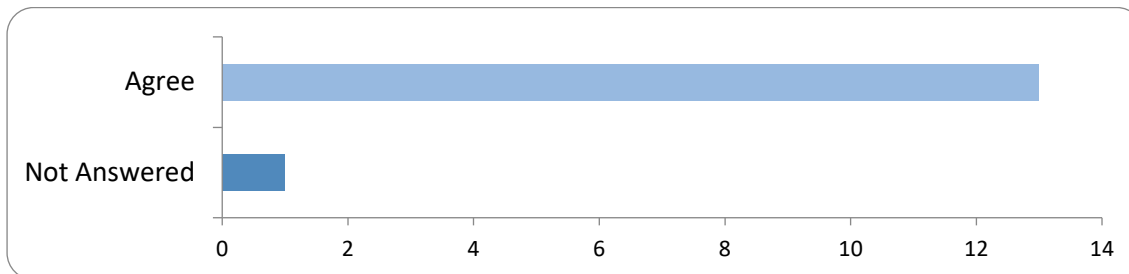


Option	Total	Percent
Agree	12	86%
Disagree	1	7%
Not Answered	1	7%

## Do you agree with the proposal on training and qualification of staff?

### Agree/disagree

There were 13 responses to this part of the question.

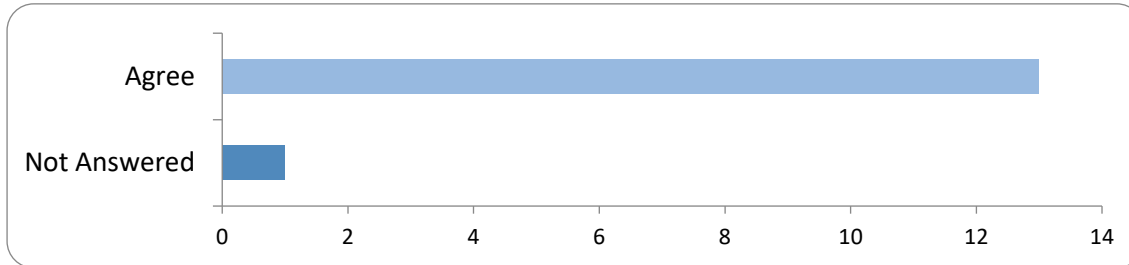


Option	Total	Percent
Agree	13	93%
Disagree	0	0%
Not Answered	1	7%

## Do you agree with the proposal on personnel fitness to undertake duties?

### Agree/disagree

There were 13 responses to this part of the question.

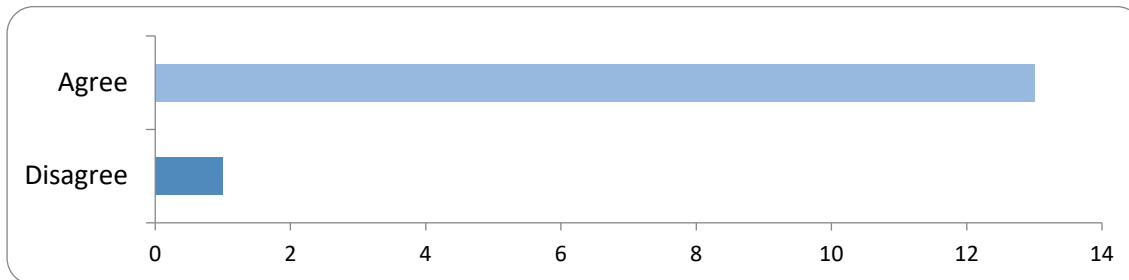


Option	Total	Percent
Agree	13	93%
Disagree	0	0%
Not Answered	1	7%

## Do you agree with the proposal for Aerodrome Operators?

### Agree/disagree

There were 14 responses to this part of the question.

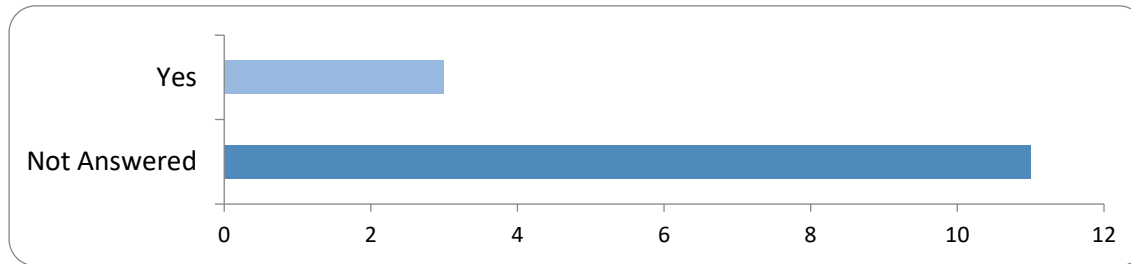


Option	Total	Percent
Agree	13	93%
Disagree	1	7%
Not Answered	0	0%

## For GHSP only - Do you currently use industry standards to demonstrate safety compliance?

### Yes/no

There were 3 responses to this part of the question.



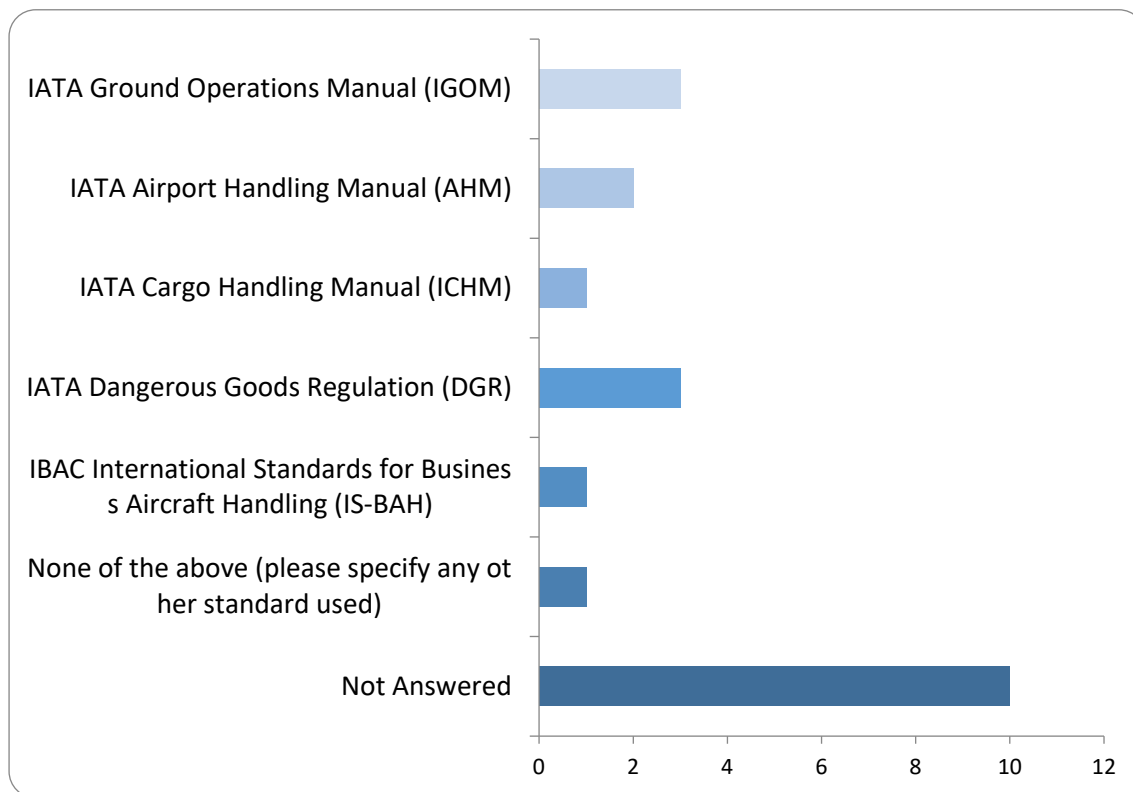
Option	Total	Percent
Yes	3	21%
No	0	0%
Not Answered	11	79%



**For GHSP only - if any, which of the following industry standards do you currently use? Select all that apply:**

**Select all that apply**

There were 4 responses to this part of the question.

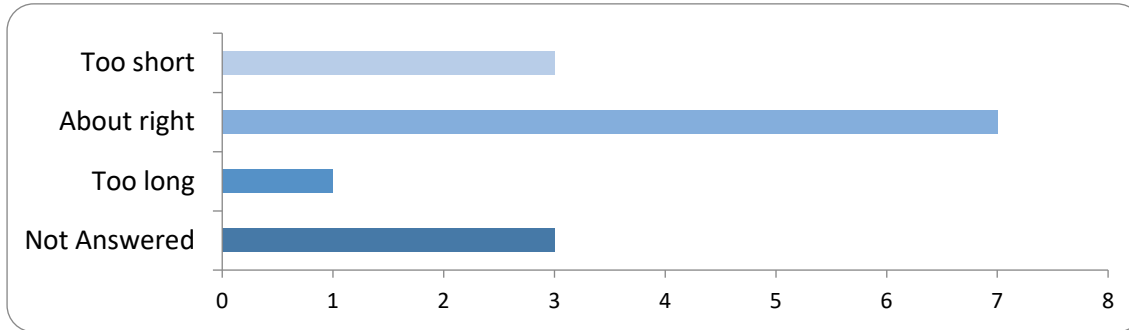


Option	Total
IATA Ground Operations Manual (IGOM)	3
IATA Airport Handling Manual (AHM)	2
IATA Cargo Handling Manual (ICHM)	1
IATA Dangerous Goods Regulation (DGR)	3
IBAC International Standards for Business Aircraft Handling (IS-BAH)	1
Joint Inspection Group (JIG) Standards relating to fuelling	0
Society of Automotive Engineers (SAE) standards relating to de-icing and anti-icing	0
EN standards for ground support equipment	0
None of the above (please specify any other standard used)	1

## Do you agree with the suggested 3 months implementation timeline?

### Select one

There were 11 responses to this part of the question.

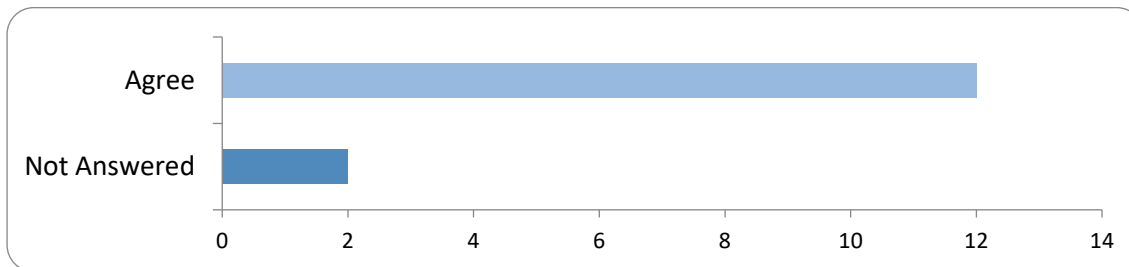


Option	Total	Percent
Too short	3	21%
About right	7	50%
Too long	1	7%
Not Answered	3	21%

## Do you agree with the suggested oversight activity?

### Agree/disagree

There were 12 responses to this part of the question.



Option	Total	Percent
Agree	12	86%
Disagree	0	0%
Not Answered	2	14%