



**Isle of Man**  
CIVIL AVIATION ADMINISTRATION

## Consultation

'CP8 - Policy and guidance for providers of Ground Handling at Certified Aerodromes in the Isle of Man'

**Opening date: 06 January 2025**  
**Closing date: 16 February 2025**

DEPARTMENT FOR  
**ENTERPRISE**   
Rheynn Gastid Dellal



Intentionally blank

## Consultation on 'CP8 - Policy and guidance for providers of Ground Handling at Certified Aerodromes in the Isle of Man'

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.

### Why we are consulting

This consultation paper describes and explains our proposed new publication 'CP8 - Policy and guidance for providers of Ground Handling at Certified Aerodromes in the Isle of Man' and sets out our key questions.

Your input will help us make an informed decision on the future aviation safety policy for ground handling in the Isle of Man.

We particularly encourage responses from any persons or organisations associated with or affected by the following ground handling services:

- ground supervision;
- passenger handling;
- baggage acceptance, handling, movement on the apron, and loading/unloading of the aircraft;
- cargo and mail handling, movement on the apron, and loading/unloading of the aircraft;
- apron handling of aircraft including marshalling; aircraft securing, towing and pushback;
- aircraft turnaround covering the following:
  - refuelling and defueling;
  - oil replenishment and servicing;
  - toilet and potable water servicing;
  - aircraft exterior and interior cleaning;
  - aircraft de-icing and aircraft anti-icing;
  - loading and unloading of aircraft including supplies and catering;
  - provision and operation of ground support equipment.

## Current situation

Until recently, the international civil aviation safety regulatory system has not included the direct regulation of ground handling services. However, the need for appropriate aviation safety regulation of ground handling services has been identified by the International Civil Aviation Organisation (ICAO) as well as by regional and state aviation safety regulatory bodies, including the European Aviation Safety Agency (EASA) and the UK Civil Aviation Authority (UK CAA).

- ICAO has promulgated a proposed amendment to its Standards and Recommended Practices, which is anticipated to take effect 26 November 2026, that will require states (including the Isle of Man) to establish criteria for the safety oversight of ground handling as part of their State Safety Programme.
- The EASA '[Basic Regulation](#)' currently provides 'Essential Requirements for Aerodromes', which includes high level objectives for ground handling services. Additionally, EASA has this year finalised their proposed new ground handling regulation ([EASA Opinion 01/2024](#)) which establishes extensive and detailed ground handling requirements. It is expected that this new regulation will take effect in 2025 with a 3-year implementation period. It should be noted that EASA aviation safety regulation has no direct effect in the Isle of Man.
- The UK CAA is developing new regulation for ground handling which is anticipated to be applicable by November 2026. UK CAA public workshops were held in autumn 2024 and a public consultation is anticipated in 2025. It should be noted that UK aviation safety regulation has no direct effect in the Isle of Man.

## What have we done

In developing our proposal, we have primarily aimed to meet the new ICAO requirement for states to establish a criteria for the safety oversight of ground handling as part of their State Safety Programme. Additionally, we have reviewed current and proposed legislation and policy in the United Kingdom and Europe. We have also taken account of the nature of current ground handling provision in the Isle of Man and any particular safety risks associated with it.

## Proposals

We propose that it is not necessary or appropriate at this time for the Isle of Man to legislate ground handling service standards, but instead will publish policy and guidance for these services. However, it is anticipated that standards for ground handling services in the Isle of Man will be legislated in due course and these will be subject to further prior consultation.

The proposed IOM CAA policy, as specified in a new IOM CAA document: 'CP8 - Policy and Guidance for Providers of Ground Handling at Certified Aerodromes in the Isle of Man', will establish:

- aviation safety requirements that are consistent with the EASA high level objectives for ground handling services;
- the responsibilities of the Aerodrome Operator when establishing and allocating apron and stand utilisation and managing apron safety risks;
- the use of industry standards for ground handling;
- the process for reporting of ground handling safety-related occurrences;
- the IOM CAA's plans for risk and performance-based safety oversight of ground handling service providers (GHSP).

An important part of the IOM CAA considerations has been to ensure that the scope of ground handling services that will be regulated is appropriate and proportionate to the potential aviation and public safety risks. In most cases, aeroplanes flying on flights for the purpose of 'commercial air transport'\* must use a 'certified aerodrome'\*\*.

\* 'Commercial air transport' is an aircraft operation involving the transport of passengers, cargo or mail for hire, remuneration or other valuable consideration.

\*\* Isle of Man Airport (Ronaldsway) is currently the only certified aerodrome in the Island.

Consequently, it is proposed that the policy **applies** only to GHSP while providing a ground handling service to the following categories of aircraft at certified aerodromes:

- aircraft that have just completed or are being prepared for a 'private flight'\*\*\* where remuneration or valuable consideration is given to the GHSP for the service;
- aircraft that have just completed or are being prepared for, a flight for the purpose of commercial air transport, regardless of whether remuneration or valuable consideration is given to the GHSP for the service.

\*\*\* A 'private flight' is an aircraft operation that is not a commercial air transport flight, and for the purposes of the document includes military flights.

The policy would **not** apply to ground handling services provided at aerodromes that are not certified.

Additionally, the policy would **not** apply to the following ground handling services provided at a certified aerodrome:

- those provided to a 'private flight' where remuneration or valuable consideration is **not** given to the GHSP for the service;

- handling of passengers with reduced mobility by an Aerodrome Operator using its own personnel, when this is the only ground handling service provided by that Aerodrome Operator;
- aircraft line maintenance or other maintenance activities performed by aircraft maintenance organisations;
- flight dispatch tasks performed by flight dispatchers;
- load control tasks related to load planning, mass and balance calculations, load control messages and communications, and issuance of load control document.

As part of this consultation the IOM CAA intends to engage with providers of flying training and aircraft self-fly hire at Isle of Man Airport (Ronaldsway) to further discuss the applicability of the policy to those types of aircraft operation.

The IOM CAA propose that this policy will come into effect 3 months after the initial publication of: CP8 - Policy and Guidance for Providers of Ground Handling at Certified Aerodromes in the Isle of Man.

## Responding to our consultation

Please submit your responses using the online system wherever possible. If you cannot use the online system, please send your comments by email to [caa@gov.im](mailto:caa@gov.im) or alternatively by post to:

**Colin Gill, Deputy Director of Civil Aviation**

Isle of Man Civil Aviation Administration  
Ground Floor, Viscount House  
Isle of Man Airport  
Ballasalla  
Isle of Man  
IM9 2AS

## Confidentiality and data protection

The information you send may be published in full or in a summary of responses.

All information in responses, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2015 and the Data Protection Act 2018).

If you have a query about how this consultation has been carried out, please contact the Isle of Man Civil Aviation Administration by email at [caa@gov.im](mailto:caa@gov.im).

## About you

Please answer the following questions.

1. Which option best describes your interest in responding to this consultation? (Please select **one**)

- Ground Handling Service Provider
- Certified Aerodrome
- Aerodrome - other
- Airline
- Airline pilot/other airline personnel
- Private/general aviation pilot
- Regulated Agent - Cargo
- Other (please specify):

Are you responding on behalf of a company?

- Yes (Company name \_\_\_\_\_)(optional)
- No

2. May we publish your response?

- Yes, you may publish my response in full
- Yes, you may publish my response anonymously
- No, please do not publish my response

## Scope of Ground Handling

### Definitions

ICAO defines 'ground handling' as the services necessary for an aircraft's arrival at, and departure from, an airport, other than air traffic services. The IOM CAA further amplifies the scope of ground handling by the definition of 'ground handling service'.

### IOM CAA proposed definitions:

**"Ground handling service"** means the safety-related activities of any of the following services:

- (a) ground supervision;
- (b) passenger handling;
- (c) baggage acceptance, handling, movement on the apron, and loading/unloading of the aircraft;

- (d) cargo and mail handling, movement on the apron, and loading/unloading of the aircraft;
- (e) apron handling of aircraft including marshalling; aircraft securing, towing and pushback;
- (f) aircraft turnaround covering the following:
  - 1. refuelling and defueling;
  - 2. oil replenishment and servicing;
  - 3. toilet and potable water servicing;
  - 4. aircraft exterior and interior cleaning;
  - 5. aircraft de-icing and aircraft anti-icing;
  - 6. loading and unloading of aircraft including supplies and catering;
  - 7. provision and operation of Ground Support Equipment (GSE);
  - 8. charging or deliberate discharging of an aircraft battery without removing it from the aircraft.

**“Ground handling service provider (GHSP)”** means a provider of one or more ground handling services. This includes any person, organisation or entity that provides such services either as a standalone service or in addition to other activities. Therefore, it includes:

- (a) a standalone ground handling organisation or business grouping;
- (b) an aircraft operator providing ground handling services to itself;
- (c) an aerodrome operator providing ground handling services.

6. Do you agree with the proposed definition for “Ground handling service”?

- Yes
- No

Comment:

7. Do you agree with the proposed definition for “Ground handling service provider”?

- Yes
- No

Comment:



8. Please explain your reasoning and add any other comments on this part of the proposal here:

### Applicability of CP8:

The policy will apply only to GHSP while providing a ground handling service to the following categories of aircraft at certified aerodromes:

- (a) aircraft that have just completed or are being prepared for a flight for the purpose of commercial air transport, regardless of whether remuneration or valuable consideration is given to the GHSP for the service;
- (b) aircraft that have just completed or are being prepared for a private flight where remuneration or valuable consideration is given to the GHSP for the service.

The policy will **not apply** to:

- (a) ground handling services provided at aerodromes that are not certified;
- (b) the following ground handling services provided at a certified aerodrome:
  - those provided to a 'private flight' where remuneration or valuable consideration is **not** given to the GHSP for the service;
  - handling of passengers with reduced mobility by an Aerodrome Operator using its own personnel, when this is the only ground handling service provided by that Aerodrome Operator;
  - aircraft line maintenance or other maintenance activities performed by maintenance organisations;
  - flight dispatch tasks performed by flight dispatchers;
  - load control tasks related to load planning, mass and balance calculations, load control messages and communications, and issuance of load control document.

9. Do you agree with the proposed applicability of CP8?

- Agree  
 Disagree

Comment:

10. Please explain your reasoning and add any other comments on this part of the proposal here:

## Safety Management System

It is proposed that any GHSP in scope of the policy should, as appropriate for the type of activity undertaken and the size of the organisation, implement and maintain a safety management system (SMS).

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

- Agree
- Disagree

Comment:

It is proposed that any GHSP in scope of the policy should develop and operate in accordance with a ground handling service manual that contain all necessary instructions, information and procedures for the service, and for service personnel to perform their duties. The ground handling service manual is to include:

1. Administration and document control
2. Organisation structure
3. Nomination of key personnel
4. SMS
5. Emergency response procedures
6. Management of change
7. Compliance monitoring
8. Reporting of accidents, incidents and occurrences
9. Sharing of safety data
10. Procedures for the consumption of alcohol, psychoactive substances and medicines
11. Contracted services
12. Training programme
13. Standard operating procedures, to include:
  - aerodrome operations;
  - airside safety;
  - ground support equipment;
  - dangerous goods;
  - security.

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

- Agree
- Disagree

Comment:

## Responsibilities of the GHSP

The GHSP is responsible for the safe operation of its activities at the aerodrome. In order to do this, we propose the following.

The GHSP shall have all the means necessary to ensure safe provision of service at the aerodrome; including, but are not limited to, facilities, personnel, equipment and material.

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

- Agree
- Disagree

Comment:

The GHSP shall comply with procedures contained in the certified aerodrome's Aerodrome Manual, including those in relation to movements of its vehicles, equipment and personnel and the risk related to aerodrome operations in winter, at night and in adverse weather conditions.

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

- Agree
- Disagree

Comment:

The GHSP shall provide the ground handling services in accordance with the procedures and instructions of the aircraft operator it serves.

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

- Agree
- Disagree

Comment:

The GHSP shall ensure that manuals for the operation and maintenance of ground handling equipment are available, applied in practice and cover operation, maintenance and repair instructions, servicing information, troubleshooting and inspection procedures.

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

- Agree
- Disagree

Comment:

The GHSP shall use only adequately trained and qualified personnel and ensure the implementation and maintenance of training and checking programmes to ensure the continuing competence of all relevant personnel

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

- Agree
- Disagree

Comment:

The GHSP shall ensure its personnel are physically and mentally fit to execute their functions satisfactorily, taking into account the type of activity and in particular its potential safety and safety-related security impact.

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

- Agree
- Disagree

Comment:

## Responsibilities of Aerodrome Operators

Aerodrome Operators have obligations to identify hazards and mitigate safety risks in the aerodrome operation. Therefore, we propose that Aerodrome Operators shall take account of the applicability of this policy to particular flights and the regulated / unregulated status of the GHSP when establishing and allocating apron and stand utilisation and managing apron safety risks.

19. Do you agree with the proposal for Aerodrome Operators?

- Agree
- Disagree

Comment:

## Recognition of industry standards

The GHSP may use the EASA ground handling regulation or other industry standards to establish its means of compliance with the CP.

20. (**For GHSP**) Do you currently use industry standards to demonstrate safety compliance?

- Yes

- No
- Not applicable

21. Which of the following industry standards do you currently use (multiple answer)?

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

22. Please add any other comments on this part of the proposal here:

## Occurrence Reporting

Effective reporting of hazards by operational personnel is an important element in the management of safety. An operational environment in which personnel are trained and encouraged to submit reports is a prerequisite of effective safety reporting.

GHSPs should report and investigate occurrences through the currently established IOM CAA occurrence report system as detailed in [CP 7 - Occurrence, Serious Incident and Accident Reporting](#).

23. Please add any comments on this part of the proposal here:

## Implementation

Once published IOM CAA propose that this policy will come into effect 3 months after the initial issuance.

24. Do you agree with the suggested implementation timeline?

- Too short
- About right
- Too long

25. If you have answered 'too short' or 'too long' to question 24, please indicate your suggested timescale for implementation:

## Regulatory oversight

It is proposed that the IOM CAA will undertake risk and performance-based safety oversight of GHSP to verify performance against the expectations specified in the policy.

IOM CAA will:

- utilise all forms of safety intelligence to inform the ongoing safety surveillance and oversight of ground handling at certified aerodromes in the Isle of Man;
- conduct a programme of turnaround observations of GHSPs which may be conducted without notice;
- undertake pre-notified safety review meetings with GHSPs as considered to be necessary to discuss any immediate safety concerns;
- hold a pre-arranged routine annual safety review meeting with GHSPs to discuss safety, risks, mitigations, and occurrences and how the GHSP is meeting the expectations set out in this CP.

26. Do you agree with the suggested oversight activity?

- Yes  
 No

27. Please add any other comments on this part of the proposal here:

## Other suggestions

If there is anything that you think we have missed, then please tell us about it here.

28. Do you have any other suggestions that were not covered in the consultation material?



## **What happens next?**

Thank you for submitting your response to our consultation on 'CP8 - Policy and guidance for providers of Ground Handling at Certified Aerodromes in the Isle of Man', which we will consider when finalising our policy. After the consultation closes, we will analyse the results and publish a summary of the responses on the Isle of Man Government's Consultation Hub website.