

The logo for ACI Europe is a blue square containing the letters 'ACI' in a large, white, serif font. Below 'ACI', the word 'EUROPE' is written in a smaller, white, sans-serif font. A white swoosh graphic curves across the square from the bottom left to the top right.

**ACI EUROPE  
POSITION PAPER**

**REQUIREMENTS FOR A  
PERFORMING & RESILIENT  
GROUND HANDLING MARKET**

**AIRPORTS COUNCIL  
INTERNATIONAL**

**November 2022**



## **Introduction**

Summer 2022 has seen a much welcome resumption of air travel after the devastating effects of the COVID-19 pandemic. Passenger traffic in Europe jumped by 247% in the first half of 2022, compared with the same period the year before – which means airports were handling an additional 660 million passengers. However, coping with the sudden increase and concentration of passenger traffic during peaks has been challenging for Europe’s airports and their operational partners – especially for ground handlers – due to acute staff shortages.

This has resulted in difficult operating conditions at many large airports, with some even facing unprecedented disruptions which severely impacted the passenger experience – as key processes including check-in, security screening, border control and baggage delivery involved longer waiting times.

The main causes of the acute staff shortage which affected airport operators and ground handlers resulted from:

- Airport operators and ground handlers coming out of the COVID-19 crisis with depleted resources, as many have been forced to lay off staff due to the immediate impact of the unprecedented collapse of air traffic in 2020 and 2021 on their finances. In this regard, the fact that airports and ground handlers received far less financial support than airlines and that such aid came rather late was a significant contributing factor to their weakened operational capabilities in the recovery.<sup>1</sup>
- An extremely tight labour market across Europe (unemployment in the EU stood historically low at 6% in July 2022). The fact that security and ground handling jobs have for many years stood at the lower end of pay scales and also involve working in shifts 7-days a week at the airport have become a clear handicap in attracting people in the current environment.
- As regards ground handling in particular, years of liberalisation triggered by the EU Ground Handling Directive (96/67/EC) have resulted in downward pressure on margins and wages that have become both socially and operationally unsustainable. The imbalance between competition and resilience was already a concern pre-pandemic, but clearly came to the fore over the past months – impacting the aviation system and the travelling public.

Airports have left no stone unturned to overcome these challenges. While there has been no quick and easy fix, closer dialogue and cooperation with airlines and ground handlers as well as exceptional declared capacity reductions at a few airports have been essential to reduce disruptions.<sup>2</sup>

These circumstances have created the momentum to reconsider the conditions and modalities under which ground handling activities are performed at European airports - with a much needed focus on operational stability and service quality along with environmental sustainability and social conditions.

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<sup>1</sup> EU airlines were granted more than 37 billion in state aid, while airports received less than 5 billion euro and ground handlers 65 million euro.

<sup>2</sup> Amsterdam, Frankfurt and London-Heathrow had to reduce capacity.



A revision of the Directive is not foreseen in the near future<sup>3</sup> - but the current regulatory context already contains sufficient scope for structural change. This also requires action by governments, regulators and industry stakeholders.

The recommendations in this paper provide guidance to recalibrate ground handling policies. They reflect the consensus within the ACI EUROPE Ground Handling Task Force and as such build upon best practices from airports across Europe.

Brussels, November 2022

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<sup>3</sup> The EC conducted an evaluation of the Directive in 2020; the outcomes should be published only in 2023. There is no initiative for a revision foreseen during the current mandate until 2024.



## Executive Summary

ACI EUROPE has identified the following guiding principles for a better functioning and more resilient ground handling market - all compatible with the EU Ground Handling Directive (96/67/EC):

- ✓ **The ground handling market should not be further opened** – the market access rules are balanced and provide for competition, while problems with regard to the service quality and social conditions can be addressed. Member States have discretion to adjust their market access if needed to balance competition with resilient and stable airport operations.
- ✓ **Airport operators should increase their remit to define and enforce minimum service levels/standards** – to improve the quality, safety, sustainability and social stability of operations. This requires close and effective cooperation with national regulators, even in Member States where airport operators do not have formal powers they should be involved to regulations are adequate.
- ✓ **Ground handling suppliers should become accountable for their operational & safety performance towards airport operators**– to mirror the increased role of airport operators to define rules. This requires cooperation and information exchange with GHSPs. The forthcoming EASA proposal for a Ground Handling Regulation should contribute to that goal – and Member States should implement the future rules in that spirit.
- ✓ **The scope of common infrastructure may be expanded** – to address airport congestion (efficiency, safety) and facilitate investments in sustainability and innovation that may not otherwise be achieved by higher operational standards or the pooling of equipment between GHSPs. Member States should accept airport operators' requests to categorize infrastructure and ground support equipment (GSE) as centralized infrastructure.
- ✓ **Ground handling operations must become aligned with the decarbonization efforts of airports** – to support Net Zero-emission goals and prepare for new obligations from the Fit for 55 package (providing electricity to stationary aircraft, ensuring the availability of Sustainable Aviation Fuels). Member States must support investments in fleet renewals and recharging infrastructure, as provided in State aid rules.
- ✓ **The Ground Handling market must become socially sustainable** – to strengthen operational resilience and improve the attractiveness of the airport as a workplace. Airport operators may, depending on their legal possibilities, encourage social dialogue and collective labour agreements. Member States must ensure labour laws provide adequate social protection.

## 1. Introduction – The need to recalibrate ground handling policies

Well-performing ground handling services are a prerequisite for the safe, efficient, resilient and sustainable operation of an airport in today's competitive aviation market. Given the tight timeframe for the handling of passengers, baggage and aircrafts, the under-performance and lack of resilience of ground handling services providers (“GHSPs”) can have serious repercussions on airport operations. The results are delays and an increase in safety and security incidents, ultimately leading to less efficient operations and a negative passenger experience.

The adoption of the EU Ground Handling Directive (96/67/EC) in 1996 has fundamentally changed the ground handling market at airports. The market saw the rise of independent GHSPs, often operating at a European or even global scale, and the retreat of airport operators and self-handling airlines. The market share of independent GHSPs was 24% in 2005 and increased to 54% in 2015.<sup>4</sup>

European airport operators recognise the positive impact that the Directive has had on aviation, through lower prices and better quality for airlines.<sup>5</sup> However, the liberalisation of the market has also resulted in continuous pressure on margins for GHSPs. Some airports have witnessed a downward spiral of lower wages and compromised service quality – raising concerns about operational stability and resilience. This was mainly the case at fully liberalized markets with several GHSPs.

In general, the dynamic growth of the European aviation market since 1996 has resulted in much increased congestion, operational complexity and environmental pressures at airports that were unthinkable at the time the Directive was adopted.

Already before the COVID-19 pandemic, it was becoming clear for airport operators that ground handling policies needed to be reconsidered and recalibrated to ensure better outcomes in terms of operational efficiency, quality and resilience as well as safety and sustainability. However, not much happened in the market - and airlines continued to focus on lower prices.

The shock of the COVID-19 pandemic, and the operational disruptions during the recovery of traffic, have created the final impetus for change. Some airport take structural measures within the boundaries of the Directive, that were long overdue. Concretely, airport operators may increase their remit to define requirements and provide common infrastructure for ground handling – all within the local context.

At the same time, GHSPs will need to become more directly accountable for their performance towards airport operators. The forthcoming EASA proposal for a Ground Handling Regulation will contribute to that goal, through the lens of safety oversight.

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<sup>4</sup> ICF, 'Ground Handling Directive, briefing paper on market opening' (2020), prepared for ACI EUROPE.

<sup>5</sup> Steer, 'Possible revision of Directive 96/67/EC on access to the groundhandling market at Community airports' (2010) available on the Commission website ([www.transport.ec.europa.eu](http://www.transport.ec.europa.eu)).



The EU Climate Objectives and the transformative requirements from the Fit for 55 package mean that GHSPs must become fully aligned with the sustainability agenda of airport operators – as cooperation is a prerequisite to achieve these goals.

All these factors should create a new balance in the governance of ground handling.

## 2. The ground handling market should not be further opened

Directive 96/67/EC already ensures a sufficient and adequate level of competition in the ground handling market. The Directive applies to some 112 airports (with more than 2 million passengers per annum) across the EU/EEA and Switzerland, which together represent 93.5% of passenger traffic. This means almost the entire market is now liberalised.

ACI EUROPE considers the market access rules are balanced. The Directive stipulates that free access to the ground handling market is consistent with efficient airport operations (recital 9). But it already recognizes possible constraints to grant market access relating to safety, security, capacity and available space (recital 11).

The Directive takes full market opening as a baseline principle, for GHSPs and self-handling airlines. But competition may be balanced by restricting market access:

- Member States may *permanently* restrict market access in four service categories (baggage, ramp, fuel and oil, freight and mail) – with a minimum of two GHSPs and self-handling airlines.<sup>6</sup> In that case, a selection procedure must be held to award licenses for a period up to 7 years. Member States may *temporarily* restrict the market further (also in other categories), to overcome space or capacity constraints, following approval from the Commission.<sup>7</sup>
- Member States may *temporarily* restrict market access in other categories, or to a further degree in the four categories mentioned above, to overcome space or capacity constraints – with approval from the European Commission.

Member States have liberalized their ground handling markets to various degrees. In some countries the market became fully liberalised (United Kingdom (before Brexit), Ireland, Sweden, Finland, the Netherlands, Lithuania, Czech Republic, Slovakia and Bulgaria), or only at some airports (France and Italy). In other countries market access was restricted (Portugal, Spain, Germany, Belgium, Poland, Latvia, Austria, Hungary, Greece, Cyprus).<sup>8</sup>

It is important to note that Member States may reconsider their initial approach to market opening – in both ways. This can be illustrated by the restriction of the market in Rome (2016), and the full liberalisation of the market in Cyprus (2021).

Airport operators and their governments should assess whether any restriction or adjustment of the number of GHSPs is necessary, to balance competition with resilience and stability. Temporary restrictions do not seem to be effective, as the capacity crunch at airports is rather structural. Introducing a market restriction may be justified to mitigate concerns about the operational and social situation at airports. Some airports have observed how competition between GHSPs resulted in a downward spiral of low margins and low wages, with detrimental effects on the quality of operations and social stability at the airport. The restriction of the market in Rome effectively mitigated such issues. Amsterdam Airport Schiphol made a similar

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<sup>6</sup> Article 6 of the Directive.

<sup>7</sup> Article 9 of the Directive.

<sup>8</sup> Airport Research Center, 'Study on the impact of Directive 96/67/EC on Ground Handling Services 1996-2007' (February 2009) available on the Commission website ([www.transport.ec.europa.eu](http://www.transport.ec.europa.eu)).

request to its government, after a long history of ground handling issues culminated in airport disruptions caused by staff shortages in 2022.

Member States with a restricted market may choose to fully liberalize the market. In Cyprus, the restricted market was fully liberalized in 2021 with a positive impact on stability (i.e. the number of GHSPs increased from 2 to 4) and competition (i.e. lower prices).

Member States may also adjust the number of GHSPs in a restricted market – for example to increase competition or strengthen resilience (i.e. in case a GHSPs leaves the market). The UK authorities have accepted in the past to increase the number of GHSPs at London Gatwick airport.<sup>9</sup>

There is no guidance in the Directive on the procedures or assessments required for market restrictions in the four ‘reserved’ categories – other than the general references to safety, security, capacity and available space (recital 11). No consultation or approval from the Commission is needed. Member States remain generally responsible for law and order, safety and security at airports (recital 17). This leaves discretion for airports to consider local market circumstances at each airport.<sup>10</sup> ACI EUROPE believes the size of the contestable market should also be taken into consideration, to balance competition with resilience and stability.

For the same reasons of resilience and stability, ACI EUROPE supports the threshold for airports whose traffic volume is too small to accommodate several GHSPs. Regional airports below 2 million passengers should therefore remain exempted from the third-party handling provisions of the Directive.

**ACI EUROPE Recommendation:** the market access regime of the Directive is balanced and should not be amended. Airport operators and their governments should assess whether it is necessary to restrict or adjust the number of GHSPs, to balance competition with resilience and stability. Member States have discretion to do so, and should take into account the local circumstances at each airport.

### 3. Airport operators should increase their remit to define requirements

The Directive stipulates that airport operators are responsible for the management of the infrastructure, including “*the coordination and control of the activities of the different operators present in the airport*”.<sup>11</sup> In practice, airport operators have struggled to coordinate and exercise control over activities of GHSPs – which remain governed by airline contracts. In the years before the pandemic, increasing operational complexity and congestion only confirmed the need for more control. Member States have been slow to recognize the need to support airport operators in that regard. Airport operators will need to increase their remit to define requirements, in order to structurally improve the ground handling situation.

The Directive provides for alignment between regulators and airport operators:

- Member States can require **standard conditions or technical specifications** in selection procedures of GHSPs (article 11).
- Authorities may require the approval of GHSPs, based on **approval criteria** (financial, insurance, security and safety of aircraft, equipment and persons, as well as environmental protection and social legislation) (article 14).

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<sup>9</sup> See UK Civil Aviation Authority, ‘Access to the ground handling market at UK airports: a review of the CAA’s approach’ (2016) available at CAA website (<https://publicapps.caa.co.uk>).

<sup>10</sup> Ibid.

<sup>11</sup> See the definition of ‘managing body of the airport’ in article 2 of the Directive.



- Airport operators may provide **rules of conduct** “to ensure the proper functioning of the airport” (article 15).

The policies and priorities of airport operators should be leading in all scenarios. The Directive clarifies that authorities’ approval criteria should “enable airports to fulfil their infrastructure management functions (...) guarantee safety and security (...) and protect the environment and social regulations” (recital 22). This means airport operators have a legitimate interest to be closely involved, or even hold the pen, when authorities define the criteria. The scope of the approval criteria and rules of conduct may include anything needed for the functioning of the airport.

Airport operators must consult the Airport Users’ Committee (representing airlines and sometimes GHSPs) on their policies – and may need to strengthen their engagement to maintain support of all stakeholders for their growing remit.

The forthcoming EASA proposal for a Ground Handling Regulation should help airport operators to strengthen their role. The new rules provide that GHSPs must ensure compliance with the airport manual, which is set by the airport operator. The proposal requires airport operators, GHSPs and airlines to establish ‘interfaces’ and a process to ensure close cooperation and mutual communication of safety relevant information. It will be essential for airport operators to take the lead. The proposals should strengthen the role of airport operators in the governance of ground handling; Member States will need to implement the rules in that spirit.

**ACI EUROPE Recommendation:** Airport operators should increase their remit to define requirements – either in their Rules of Conduct or public regulations in cooperation with regulators. The forthcoming EASA proposal for a Ground Handling Regulation should further strengthen the role of airport operators in the governance of ground handling. Member States should implement the future rules in that spirit.

#### **4. Ground handlers should become accountable for their operational & safety performance**

To mirror the increase remit of airport operators in the governance of ground handling by setting requirements, they must be enabled to actually hold GHSPs accountable for their performance - through licensing and oversight.

ACI EUROPE advocates that airport operators establish a direct relationship with GHSPs through licenses or concession agreements. Several airport operators have already provided for a ‘license to operate’ under which they engage with GHSPs and supervise their performance. For reference, ACI World and the handlers’ association published a template agreement in February 2020.<sup>12</sup>

But in all instances, the enforcement powers of airport operators remain limited (warnings, financial penalties). The power to suspend or expel GHSPs is reserved for authorities, in several ways:

- The approval of GHSPs by public authorities may be **withheld** or **withdrawn** if it does not meet the approval criteria (article 14).
- At the request of the airport operator, Member States may **prohibit** a GHSP if it fails to comply with airport operator’s rules of conduct (article 15).

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<sup>12</sup> <https://store.aci.aero/form/aci-ground-handling-agreement-template/>





The Directive only provides that airport operators are informed about such decisions of authorities. ACI EUROPE calls upon Member States to involve airport operators in the oversight of GHSPs, including when taking enforcement measures.

The forthcoming EASA proposal for a Ground Handling Regulation will strengthen the safety oversight. Member States will be required to designate a “competent authority” with sufficient enforcement powers. GHSPs must file a declaration to these regulators, stating their capacity to fulfil all obligations. ACI EUROPE has called for coherence with the existing oversight based on the Directive. Although the competent authority remains responsible for the oversight, airport operators should become informed of the assessment of the declarations of GHSPs. The current enforcement powers should be extended to the safety regulations.

**ACI EUROPE Recommendation:** GHSPs must become directly accountable for their operational & safety performance at airports. Member States must liaise with airport operators regarding their oversight of GHSPs and enforcement measures. The EASA proposal for a Ground Handling Regulation should strengthen the oversight of ground handling. The oversight of safety rules should be coherent with the existing oversight based on the Directive.

## 5. The scope of common infrastructure should be expanded

As airport operators may define higher standards for ground handling operations, they should consider the airport infrastructure and ground support equipment (GSE) needed. If higher standards cannot be delivered by GHSPs, airport operators may expand the scope of the infrastructure under their management which is made available to provide ground handling services (so-called ‘centralized infrastructure’).

The Directive provides that Member States may reserve for airport operators the management of “centralized infrastructure used for the supply of ground handling services whose complexity, cost or environmental impact does not allow for division or duplication (...)” (article 8). This is considered necessary for the proper functioning of the airport (recital 13). The non-exhaustive wording refers to baggage sorting, de-icing, water purification and fuel-distribution systems.

In practice, Member States have reserved a wide range of centralized infrastructure at EU airports. The increased complexity and congestion at airports, as well as higher safety standards, environmental standards and innovation, can all justify a further expansion of centralised infrastructure. Member States should take an open and flexible approach towards proposals from airport operators – considering both fixed infrastructure and GSE.

Several airport operators have experienced congestion on the ground, notably in a liberalized market with GSE from several parties on the apron (for example, stairs and baggage charts). Airport operators may consider providing all critical GSE on the apron, to be designated as centralized infrastructure by the authorities.<sup>13</sup>

Sustainability goals and innovation may also justify the designation of GSE as centralized infrastructure, if investments in renewals by GHSPs are not possible. Their investment capacity may be constrained by short contact periods (on average 3 years) or license periods (maximum 7 years) – which may be shorter than depreciation times.

Several airport operators have explored the ‘pooling’ of GSE, although only a few have been successful (London Heathrow, London Luton, Vienna). In this model, handlers may agree to use common GSE – managed by a third party. The airport operator may facilitate the appointment of a service provider who will be accountable for the implementation, management and delivery of a pooled GSE rental scheme. This model may potentially be considered at other airports, taking

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<sup>13</sup> GAR Case Study: Ground Services Equipment Pooling Scheme at Hong Kong International Airport | Airports Council International - ACI Asia-Pacific (aci-asiapac.aero)



into account the 'best practices' so far, with the caveat that the cooperation of all stakeholders is necessary.

**Recommendation ACI EUROPE:** airport operators may expand the scope of centralized infrastructure – to mitigate congestion on the ground (operations, safety) and to achieve higher ambitions (sustainability, innovation). Member States should support a flexible approach towards requests to define GSE as centralized infrastructure. The pooling of GSE could become an alternative which airport operators may want to explore and facilitate.

## **6. Ground handling operations should become aligned with the decarbonization efforts of airports**

The Climate Emergency remains a top priority for European airports. The European Green Deal includes a target to reduce 90% of transport emissions by 2050. As airport operators work on reducing their CO<sub>2</sub> emissions, they also seek to engage and cooperate closely with all operational stakeholders. The alignment of GHSPs with the decarbonization efforts of airports is indispensable.

Ground handling operations are one of the main sources of airport emissions, in particular from vehicles and GSE running on fossil fuels. The electrification of the GSE fleet is a primary step for the decarbonization of airports. To achieve this goal, airport operators may set requirements for GHSPs to bring electric GSE – but airport operators will need to provide the necessary recharging infrastructure. Airport operators should be free to categorise GSE as centralised infrastructure, or facilitate pooling, to that end. They may also provide financial incentives for other climate measures (for example, the use of fossil free diesel).

The European Commission has called for zero-emission airports, as part of the 'Sustainable and Smart Mobility Strategy'<sup>14</sup> – which prioritizes the renewal of GSE fleets to achieve that goal. It has adopted State aid rules<sup>15</sup> allowing public financial support for investments in clean equipment and recharging infrastructure.

The Fit for 55 legislation will result in new environmental obligations for airport operators in cooperation with GHSPs. The Alternative Fuel Infrastructure Regulation (AFIR) requires the provision of electricity to stationary aircraft at the gate by 2025 (or 2030 at remote stands). The ReFuel EU Aviation proposal requires the facilitation of the uptake of sustainable aviation fuels. These joint obligations of airport operators and GHSPs mean their cooperation must be strengthened.

Member States will need to provide financial support for investments in airport infrastructure that follow from the Fit for 55 proposals, in recharging infrastructure (AFIR) and fuel systems (ReFuel EU Aviation). The EU climate state aid rules allow Member States to support early investments to meet future obligations (i.e. until 12 months before their entry into force).

**ACI EUROPE Recommendation:** airport operators should fully align ground handling policies with decarbonization efforts. The Net Zero ambitions of airports can only be achieved by reducing emissions from ground handling operations. GSE fleet renewals are a key measure, and should be pursued by airport operators and GHSPs together – with public financial support from Member States. The forthcoming Fit for 55 legislation will increase the environmental remit of airport operators, and may require investments in recharging and fuel infrastructure at airports (with possible financial support from Member States).

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<sup>14</sup> EC Communication, 'Sustainable and Smart Mobility Strategy', COM 2020/789

<sup>15</sup> EC Guidelines on State aid for climate, environmental protection and energy 2022.

## 7. The Ground Handling market should become socially sustainable

The liberalization of the ground handling market has resulted in competition between GHSPs, with pressure on margins and wages of employees. Short term contracts and limited furlough schemes in many Member States have resulted in a loss of 32,000-40,000 ground handling jobs during the COVID-19 pandemic (25% of total).<sup>16</sup> When air travel resumed in the Summer of 2022, airports where jobs were lost had difficulties to attract workers and suffered most from staff shortages. Strikes exacerbated the operational pressure at airports across Europe. Some airport operators have already taken unprecedented operational action or measures to improve the social situation.<sup>17</sup> More generally, all stakeholders agree conditions must improve to increase the attractiveness of the airport as a workplace.

The Directive provides that Member States retain the power to ensure an adequate level of social protection for ground handling workers. This means social conditions need to be guaranteed in national laws. Collective labour agreements between social partners may outline terms and conditions of employment (wages and benefits, work organization, working hours, etc.) that go beyond the minimum legal standards. Such agreements may be concluded at national or lower levels, for example at the airport site. Stakeholders may also adhere to voluntary schemes, like the “London Living Wage” applied at airports in London (i.e. an hourly pay rate above the legal minimum, to reflect the higher costs of living in London).

Airport operators may, depending on their legal possibilities, increase their social involvement by encouraging social dialogue and collective labour agreements (even without co-signing). Social clauses may be included in selection criteria or airport rules, for example requiring GHSPs to respect collective labour agreements.

Airport operators may consider addressing specific social issues in their rules, or encourage national authorities to include these in labour laws:

- Obligations on the transfer of staff between GHSPs, when contracts or licenses are terminated;
- Minimum requirements for training and working conditions;
- Restrictions on sub-contracting between GHSPs to ensure oversight and compliance with quality and social standards.

The forthcoming EASA proposal for a Ground Handling Regulation recognizes the link between social working conditions and safety (through better training and a safety culture) – this should also be reflected in the airport regulations.

ACI EUROPE cooperates with European social partners in a dialogue on the ground handling sector, with a joint focus on improving the attractiveness of the sector.<sup>18</sup>

**Recommendation ACI EUROPE:** airport operators may increase their involvement to improve social conditions and the attractiveness of the airport as a workplace. Depending on their legal possibilities, they may encourage social dialogue and collective labour agreements – aiming for minimum social standards for all workers at the airport. This should ultimately improve airports’ operational stability and resilience.

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<sup>16</sup> Steer, ‘Study on the impact of the COVID-19 pandemic on the aviation market’ (forthcoming).

<sup>17</sup> Amsterdam Airport Schiphol supplemented wages of 15,000 airport wages during Summer 2022.

<sup>18</sup> ACI EUROPE, ASA, ETF, ‘Market Access, Social Conditions, Training, Qualifications and Quality Standards in the Ground Handling Industry’ (February 2018).



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*ACI EUROPE is the European region of Airports Council International, the only worldwide professional association of airport operators. ACI EUROPE represents over 500 airports in 46 European countries. Member airports handle 90% of commercial air traffic in Europe, welcoming 2.3 billion passengers in 2018.*