

OPEN LETTER FROM HSE TO AIRPORTS, AIRLINES AND GROUND HANDLERS AT GB AIRPORTS re CONNECTION OF GROUND POWER UNITS TO AIRCRAFT WITH ENGINES RUNNING

We are writing to you to outline our position on the emerging practice of connecting Ground Power Units (GPUs) with the aircraft engines still running, in response to queries and concerns from a number of people in the industry. The points outlined in this letter are the result of discussions with the CAA, ground handlers and airlines regarding these new procedures.

Ground handling companies are now being requested by airlines to routinely connect GPU to aircraft whilst the engines are still powered and the anti-collision lights are still on. While procedures are already in place where the APU is inoperative, such routine procedures may be a departure from normal or past practice and by adopting this procedure it may place ramp workers at a greater risk, including others working near or around the aircraft.

The Management of Health and Safety at Work Regulations 1999 put in place a number of duties upon employers in respect of such issues as risk assessments, principles of prevention, health and safety arrangements and cooperation and coordination with other employers. The principles of prevention include such issues as:

- if possible avoid the risk altogether;
- evaluate risks that cannot be avoided by carrying out an assessment;
- combat risks at source;
- adapt work to the requirements of the individual (consulting those who will be affected);
- take advantage of technological and technical progress;
- implement risk preventive measures to form part of a coherent policy;
- give priority to those measures that protect the whole workplace and everyone who works there;
- ensure that all those affected understand what they must do.

These procedures can be undertaken safely, however this will only be achieved if the following points are addressed, with adequate monitoring to ensure that the safe and correct procedures are followed at all times.

All airlines, ground handling companies and other service providers involved in these new procedures should consider and take appropriate action on the following:

- a. Employers should not accept new/changes in procedures that could introduce new risks or reduce any margin for error, unless it can be shown that all necessary steps have been taken to avoid or reduce risks, so far as is reasonably practicable.
- b. New/changes in procedures need to be assessed for risk, this includes those who are seeking to introduce them (airlines) and should include risks to other parties (ground handlers, service providers, other ramp workers etc) In practice, it is best if such assessments are undertaken jointly by all that may be affected.
- c. The findings of all risk assessments should be documented including the risk avoidance/mitigation measures introduced. Procedures must be specific, documented and agreed by all parties.
- d. Any new/changes in procedures should only be introduced after full consultation with employees and/or their representatives.
- e. All persons who could be affected must be aware of the risks and adequately trained in the safe procedures to follow - this includes any other airport

employee who could be in the general area and thus at risk when this task is undertaken.

- f. The introduction of new procedures should initially be subject to increased supervision, until such time as everyone involved is certain that procedures are being followed in a safe and correct manner.
- g. Robust accident, incident and near miss reporting procedures should be implemented to ensure that any emerging risks/remedial action are identified and acted upon.
- h. Ongoing auditing, monitoring and review should be undertaken to evaluate the effectiveness of the procedures and if necessary to take appropriate action to rectify any deficiencies.

The Air Transport industry may also need to consider the long-term implications upon the ramp safety culture when introducing new/changes in procedures, for example will ramp staff now consider it safe to approach any aircraft with the anti-collision lights on?

Our Inspectors have been informed of this issue and at future visits will be expecting to see evidence that duty holders (airlines, ground handlers, other ramp staff etc) have taken action to address the risks from this practice, if it is undertaken.

If you have a query on this issue, please contact HSE Infoline on 0845 345 0055 and ask to speak to the HSE Transportation Section.