

Connection of Ground Power with Engines Running – latest HSE thinking – Dec 10.

As the issue of connection of GPUs to aircraft with engines running was on the agenda, I thought it would be worthwhile setting out HSE's current thoughts on this matter, following the incident at Edinburgh Airport and subsequent HSE enforcement action.

Some of you may not have a direct interest in this topic - I would appreciate any feedback from those that are, and I'm happy to enter into some electronic discussion with those individuals as a group, so that we might have an agreed line by the time of the next GHOST meeting.

1. HSE previously sent out a letter to industry setting out our concerns about the introduction of new routine procedures for attaching GPU to aircraft while engines are still running.
2. While we were unable to obtain any explicit technical data about the level of risk of ingestion or jet blast from engines at low revs or spooling down, it was our view that allowing workers to approach aircraft with engines running and anti-coll lights on, removed one level of safety from airside procedures. While this standard line is still dependent on vigilance and human factors, we do feel that it is a standard which can be embedded into all airside training - to stop and think, or check, before approaching an aircraft. It is a principle which is included in HSE guidance for the health and safety of our own inspectors.
3. Our line at that time was that new procedures would have to be explicit and that additional levels of training and supervision would be necessary. A more real risk is, perhaps, that while workers actually engaged in connecting the GPU might be adequately trained and supervised, there is a possibility that other workers in the area would simply see someone approaching an aircraft and assume it was safe.
4. Additional concerns have been raised because there are no 'standard' procedures for all aircraft and airlines - there is variation in procedures, and in which engine might be running. This is likely to add to the possibility of confusion, and workers or vehicles inadvertently straying into danger.
5. The incident at Edinburgh Airport gave HSE an opportunity to investigate the wider safety issues, and enforcement action was taken.
6. As you are all probably aware, there are work practices and procedures at airports which would not be tolerated on health and safety grounds in any other industry. Examples include working conditions for baggage handlers in the hold of aircraft, risks of falls from open aircraft doors, or risk of falls from GSE positioned to avoid damage to aircraft. HSE has always tried to be pragmatic, and we do, of course, accept that there are some situations at airports where standards have to be different, and that it is a dynamic work environment subject to other legislation and standards, and intense competition.
7. HSE Human Factors specialists, who do not have specific experience of airport operations, were asked to comment on procedures for connecting GPUs in both routine and emergency/ APU inop situations. Their opinion was that procedures did not reduce risks to workers 'so far as is reasonably practicable'.
8. My understanding of the current situation is that Servisair, Menzies, BAA Edinburgh and Gatwick have all directed that routine connection of GPU with engine running will not be undertaken until the issues are resolved.
9. **I would like to emphasise that, while HSE HF specialists have concerns about practices, there is nothing to stop emergency/ inop APU procedures being used where necessary, providing these procedures are adequate. We have no reason to think that the procedures that have been in use for many years are inadequate, but would expect all those involved to re-assess their procedures in the light of recent discussions.**
10. We now have two choices - (1) to gain agreement on standard procedures which would adequately address worker safety or (2) decide that there is a 'reasonably

practicable' alternative, which is to return to the previous situation where no-one approached an aircraft with engines running and anti-coll lights on, unless it was part of a specific emergency/ APU inop procedure.

At the moment it is the opinion of HSE HF specialists that it is the second of these options which should be adopted. The procedures worked previously, and it has now been demonstrated that the new procedures are not necessary, as several handlers and airports have suspended the practice.

I hope the above correctly summarises the situation, and would appreciate any feedback about the issues, any reasons why the industry cannot revert to the previous standard of control for approach to aircraft with engines running, and what (if any) difficulties would present if HSE took the line in 10 (2) above. We do appreciate the commercial and cost pressures for the industry, and are keen to achieve a sensible solution to this issue.

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