



**GATWICK AIRPORT LIMITED  
RESPONSE TO THE EC CONSULTATION  
ON A POSSIBLE REVISION TO THE  
GROUND HANDLING DIRECTIVE 96/67/EC**

**1. RESPONDENT INFORMATION**

**1.1. Identification**

**(1) I speak on behalf of:**

- (a) Myself (as a citizen)
- (b) An organisation ✓**

**Please can you identify which organisation you represent, and a contact email address?**

**Answer for organisation name:** [Gatwick Airport Limited](#)

**Answer for email address:** [andrew.walker@gatwickairport.com](mailto:andrew.walker@gatwickairport.com)

**(1c) Please can you select the organisation type?**

- (c) Airport or airports' association ✓**
- (d) Airline or airlines' association
- (e) Handling company or handling companies' association
- (f) Freight integrator
- (g) National government
- (h) Regional government
- (i) Local government
- (j) Trade Union/Worker's organisation
- (k) Association/non-governmental organisation
- (l) Academic institution,
- (m) Other private company
- (n) Other

**1.2. Views of the respondent**

**(2) Please can you confirm your agreement to having your views made public and/or attributed to your organisation when we summarise the results of the consultation.**

- Yes ✓**
- No

**1.3. Role and interest of the respondent**

**(3) Please can you identify your role and interest in the potential revision of the Groundhandling Directive?**

[As an airport owner and operator any revisions to the Directive will have the potential to influence the operation, costs and profitability of our business.](#)

[There are also aspects of the Directive that could be clarified so that its operation does not unnecessarily restrict the commercial freedom of an airport and competition between airports, while at the same time protecting competition in the provision of ground handling services.](#)



## 2. ADDITIONS TO THE DIRECTIVE

### **Subcontracting governing rules:**

No framework or regulation for subcontracting is provided in the Directive and stakeholders reported that it is unclear in which circumstances it is allowed.

The need for keeping clear responsibilities is a key issue, as pointed out by all stakeholders. In that perspective, some stakeholders have suggested a limitation to one level of subcontracting. Other proposals include imposing full liability to the contractor or prohibiting subcontracting for sensitive or central groundhandling tasks.

It was also raised that subcontracting would need to be transparent, notably to allow appropriate reservation of space and to ensure that the subcontractor is duly authorised to operate at the airport (i.e., where appropriate, approved and/or selected through tender).

**(4) Do you think specific rules regarding subcontracting would need to be introduced, for part or all groundhandling activities? If so, what should these rules contain? Please specify the advantages and disadvantages of your suggestions, as well as their economic, social and environmental impacts.**

The subcontracting of ground handling activities at Gatwick Airport has not been a substantive issue and has only arisen in limited areas (for example over-size baggage and baggage information/recovery). We also have the ability to exert a degree of control and influence over subcontracting through our contractual arrangements with ground handlers. These considerations suggest that further regulations relating to subcontracting are not required.

### **Quality measures:**

There are currently no minimum requirements in the Directive in terms of quality of services (in terms of training of staff, quality controls, environment protection, respect of safety and security rules, etc.).

If quality measures were to be introduced, possible solutions would include:

- minimum training requirements,
- quality standards in the selection process,
- key performance indicators to be defined locally (by the airport or an independent authority),
- individual staff qualification (licensing),
- company licensing.

**(5) What would be the advantages and disadvantages of these solutions (or a combination of these) or any other tools that you might propose? Please specify the economic, environmental and social impacts of your suggestions.**

The quality of groundling services can have an important impact on an airport's reputation and competitive position. We would welcome confirmation from the Commission that the Directive is not intended to restrict the ability of airport owners to impose quality service standards on ground handlers (including establishing appropriate financial incentives) – subject to this not preventing competition in the provision of ground handling services.

One area which it might be advantageous to consider explicitly including within the remit of the Directive is the setting of minimum operational standards on aircraft turnarounds. This is a key activity for ground handlers, but at present there is insufficient clarity as to the responsibility for safety and the setting of standards. Any revisions in relation to these matters would need to be aligned with proposals currently being developed by EASA (European Aviation Safety Agency).



**Working conditions and staff transfer:**

The Directive allows Member States to take measures to ensure the protection of the rights of workers. The measures for the protection of workers may therefore be different from one Member State to another, depending on the national systems in place regarding protection of workers.

The issue of transfer of staff is a particular issue in this context. Directive 2001/23/EC safeguarding the rights of employees in the event of transfers of undertakings is applicable (notably) to the groundhandling sector. However, there have been cases where "transfers" in the groundhandling sectors were considered as being beyond the scope of protection already safeguarded by this Directive.

**(6) What would be the advantages and disadvantages of introducing specific measures regarding transfer of staff in the groundhandling Directive for the cases which could fall beyond Directive 2001/23? Please specify economic, social and environmental impacts.**

See answer to Question (7)

**(7) What other measures would you suggest to improve working conditions in the groundhandling sector? Please specify the advantages and disadvantages of your suggestions, as well as their economic, social and environmental impacts.**

We are not aware of any evidence that suggests further regulation is required relating to the transfer of ground handling staff or working conditions. Any assessment of further regulation should take full account of the possible costs on ground handlers, airlines and passengers.

**Representation of airlines**

Under the current directive, airport users have no obligation to be represented physically at European airports they serve. Most of the time, an airline, if it is not present at the airport, contracts with a groundhandling agent (presumably groundhandlers in charge of ground administration and supervision – groundhandling category 1) in order for this groundhandler to coordinate between the various groundhandling activities, and to represent the airline at the airport. However, such representative, when it exists, is often not known by the passengers, which results in passengers having sometimes difficulties to find the relevant interlocutor (for instance in case of mishandled baggage or any other setback at an airport involving an airline or its groundhandling agents). The same kind of issue is apparently encountered by some Member States which reported that they could not always find a representative of the airline legally accountable for the airline (in particular for financial commitments, slots...) or legally accountable in front of the Courts and the airport authority.

**(8) What would be the advantages and disadvantages of obliging airport users to be present or to be legally represented by a groundhandler? Please specify the economic, social and environmental impacts.**

As noted in the consultation document a requirement on airlines to either have a representative at each airport or to be legally represented by their ground handler would increase clarity and make enforcement of contractual and other obligations more straightforward. Gatwick Airport supports this proposal.

**Safety/security**

On several occasions since the entry into force of the Directive and in particular in a recent study (available at [http://ec.europa.eu/transport/air/studies/doc/airports/2009\\_02\\_ground\\_handling.pdf](http://ec.europa.eu/transport/air/studies/doc/airports/2009_02_ground_handling.pdf)), the Commission investigated the safety and security implications of the Directive 96/67. However, even in this last study which included meetings with all stakeholders, no firm conclusions could be



drawn on safety and security issues, in particular for security where no data was provided. The Commission would therefore be interested in having a factual description of situations/case studies where the implementation of the Directive could have led to safety/security problems.

**(9) Have you encountered safety/security problems which could be linked to the implementation of the Directive? If yes, could you precisely describe such problems and their link to the Directive?**

Gatwick Airport has in the past applied to the CAA to limit the number of ground handlers operating at the airport for safety and capacity reasons.

See <http://www.caa.co.uk/default.aspx?catid=78&pagetype=90&pageid=69>

The existing processes that allow for limits on the number of ground handlers have worked adequately and in general allowed us to deal with the safety issues associated with competition in the provision of ground handling services. Nevertheless, there are additional issues relating to aircraft turnarounds discussed in response to Question (5) which could be dealt by introducing appropriate changes to the Directive.

### **3. CLARIFICATIONS TO THE DIRECTIVE**

#### **Tender process**

In the case where the number of groundhandling providers is limited, the selection of suppliers shall take place according to a tender procedure. The main issues which were identified by stakeholders as requiring clarification include: the length of period for a contract when tendered and the evaluation of tenders, in particular regarding the role of the Airport User Committee (AUC).

- Length of period of a contract when tendered

The directive currently sets to maximum 7 years the length of period of a contract when tendered. This period is considered by some stakeholders as too short for big investments in personnel and equipment. However, there is a trend in the industry to rely more and more on rents for expensive equipments.

**(10) What would be for you the advantages and disadvantages of extending tender contracts to a different period of time such as 10 years? Please specify the economic, social and environmental impacts.**

There are significant disadvantages associated with long-term contracts in terms of a reduction in the flexibility needed to adapt to changing circumstances and we oppose any increase in the maximum contract length. If significant investments are required and cannot be funded by ground handlers and/or airlines then there is the flexibility to provide centralized infrastructure consistent with Article 8 of the Directive.

It would increase clarity and transparency if the list of examples given in the Directive of activities potentially covered by centralized infrastructure could be extended, for instance to include check-in, the provision of vehicles and other equipment.

- Evaluation of tender and Airport User Committee (AUC)

The Airport User Committee (AUC) has a consultative role with respect to the tender process in the current Directive. It shall be consulted for technical specifications and standards in the tender, and for the selection of suppliers. However, at present, there is no obligation to justify why the



Committee's recommendation is not followed, even in those cases where this recommendation is unanimous.

At the same time, with the current composition of the AUC, some members may have a conflict of interests, as they can be at the same time groundhandling suppliers and airport users.

**(11) What would you suggest to ensure that airport users' preference is better taken into account in the selection process, which at the same time would not result in conflicts of interest? Please specify the economic, social and environmental impacts.**

An additional obligation could be included in the Directive requiring the managing body of the airport and relevant competent authority to explain their decisions relating to the selection of suppliers.

Members of the AUC who have a conflict of interest relating to ground handling services could be excluded from the decision making process used by the AUC to formulate advice on ground handling services.

#### **Selection of self-handling providers**

The number of self-handling providers for airside services can be limited pursuant to article 7 of the Directive. However, no mechanism is proposed in the Directive to select the self-handling providers authorised to carry-out self-handling, in contrast to third-party handling providers who have to be selected through tender. Such mechanism could rely on criteria to be defined.

**(12) In the cases where the number of self-handling groundhandlers is limited, what would be the advantages and disadvantages of introducing a mechanism to select self-handling providers, such as the definition of criteria? Please specify the economic, social and environmental impacts.**

Where there is a need to limit the number of self-handlers this should be the responsibility of the managing body of the airport.

#### **Charges to access/use airport installations:**

The Directive does not rule out the possibility that access to airport installations may be subject to a fee. Case C363/01 clarified that the fee to access installations can be of an amount "which takes account of the interest [of the managing body of the installations] in making profit". However, there is no agreement on what can be charged including a reasonable "profit margin" and to what level.

**(13) What would be the advantages and disadvantages of defining more precisely elements to be taken into account for assessing a fee and its "reasonable profit margin" part for the access to airports installations?**

See answer to Question (14)

**(14) What would be the advantages and disadvantages of an independent authority being in charge of monitoring airport installations' fees/charges (including for centralized infrastructures' fees and charges), similarly to what exists for airport charges in Directive 2009/12? Please specify the economic, social and environmental impacts.**

The reasonable level of profit will depend on the precise nature of the services being provided, the associated risks, financing costs and regulatory arrangements for airport charges. Therefore assessing reasonable profits needs to be done taking account of the circumstances of each case and so is not something that should be dealt with by the Directive.



Gatwick Airport is not aware that there have been significant problems with the fees and charges for centralized infrastructure and so there does not appear to be a case for increasing the amount of regulatory intervention in this area.

### **Separation of accounts for undertakings in the groundhandling market**

The implementation of the separation of accounts obligation was raised by stakeholders as needing clarification. The methods to ensure the effective implementation of accounting separation are indeed not specified in the Directive. In the current Directive, separation of accounts between their groundhandling activity and their other activities is required of all groundhandling providers, whether they are airports, airport users or groundhandling suppliers.

The issue also exists of who is the "independent examiner" in charge of checking that this separation of account is effectively carried out for all groundhandling providers. This independent examiner shall also check that airports do not cross-subsidise between their activities as groundhandler and as managing body. The question arises as to what transparency requirements shall be expected regarding these verifications.

**(15) Should more precision on the separation of accounts be given? If so, which stakeholders should be covered by this requirement, what should be the rules and which methods should be used to ensure effective implementation of the accounting separation requirement? Please specify the economic, social and environmental impacts .**

[See answer to Question \(16\)](#)

**(16) What would you suggest to introduce more precisions about the independent examiner's checks? Should there be a compulsory and regular publication of the effective auditing of the accounts? Should the independent examiner's reports (or part of them) be available publicly? Please specify the economic, social and environmental impacts**

[If the regulations with respect to separate accounts are to produce meaningful results then separate accounts for ground handling activities should be audited and published on a regular basis.](#)

### **Airport groundhandlers and selection procedure**

Airports have the right with the Directive to provide groundhandling services without having to be selected through tender. This features is also valid for the undertakings controlled by the airport (or controlling the airport) such as airport's subsidiaries, and a trend could be observed in the recent years for airports to set up subsidiaries specialized in groundhandling. Such subsidiaries can compete today on the groundhandling markets at several airports.

A number of stakeholders raised that this situation leads to competition distortion, as it gives a clear advantage to the "airport groundhandler" when compared to its competitors.

Airports on the other hand raised that the right for airports to keep a groundhandling activity can be motivated by public service interest reasons.

Apart from this debate, it could be questioned whether the current criterion of "control" by the airport (or control of the airport) is still relevant nowadays in view of the privatisation of airports. Airports could indeed today "control" (or could be "controlled" by) other groundhandling suppliers (such as major airlines at "hubs"); this could lead to situations where several suppliers are exempt from the selection procedure.

**(17) What would be for you the advantages and disadvantages of making it compulsory for airports and/or for the airports subsidiaries to pass a tender procedure? Please specify economic, social and environmental impacts.**



Applying the same tendering rules or approvals process for all providers of ground handling services should encourage competition.

**Space constraints and their impact on the constraint on competition:**

Competition can be influenced depending on how the use of apron space for groundhandling activities is managed. There is also no framework to manage allocation of space when physically limited, in particular when the market is fully open.

Airports have indeed limited ground coverage so that even if the market is fully open, a time can come when a new groundhandler cannot be accommodated. Groundhandling operators need space for equipment storage and staff. Even where ground equipment is rented, it has to be present at the airport, and the level of equipment is determined by the level necessary to service the airport at peak periods. In addition, space allocated to a groundhandling company might be more or less advantageous when compared to the location of operations.

For airports with a limited number of operators, the number of authorised handlers can in theory be fixed at the "appropriate" number of handlers. However, even in the ideal case where the number of handlers perfectly fits the space allocated, the "value" of the premises allocated may differ from a handler to another.

For airports with no limitation in number (fully opened market for airside activities), the issue arises of what happens when the market is saturated and when there would be more groundhandling undertakings interested in operating at the airport than there would be premises readily available. Due to the limited space of airports, building new premises may indeed not be possible (or may only be possible on a long-term period when compared to the market timescale). Possible solutions proposed so far for this situation include:

- Auctioning of airport premises ;
- "first arrived, first served" option (new entrants have to wait that a premise is made available);
- Definitions of minimum criteria which have to be met by a new entrant to obtain premises (expected market share, number of staff or equipment).

**(18) What should be the best way to manage space for groundhandling activities at airports and ensure fair competition?**

[See answer to Question \(19\)](#)

**(19) In the case of fully opened markets for airside activities, what would be the advantages and disadvantages of the solutions proposed (or any other solution you might propose)? Please specify the economic, social and environmental impacts.**

Gatwick Airport complies with the relevant airfield design standards, nevertheless there is not unlimited space on the airfield. Space constraints are dealt with by allocating available space broadly in line with the size of ground handling activities (measured either in terms of air traffic movements or passengers served). Having the ability to charge for space provides a useful backstop, in that if congestion were to become a significant factor, then the pricing of space would encourage the efficient utilisation of capacity.



#### 4. SIMPLIFICATION OF THE DIRECTIVE

##### **Groundhandling market regulation**

With the Directive, access to groundhandling services was open to competition; such a liberalization was introduced at airports considered big enough to accommodate in a sustainable manner at least 2 competitors (i.e. airports over the threshold of 2 millions passengers or 50 000 tons of freight a year). However, in contrast to landside groundhandling services, the Directive left for airside groundhandling services the possibility (chosen by certain Member States) to limit the number of suppliers and selfhandlers to a number to be defined by Member States (in the national measures of transpositions of the Directive) and/or by the airport or an independent authority. This possibility conducted to introduce compulsory tender procedure to ensure transparency and non-discrimination in the selection of the providers.

As a result, EU groundhandling market is today a mosaic of different national markets, with different numbers of minimum suppliers (some Member States limiting the number of airside providers to 2 for all airside categories while others chose 2, 3 or 4 depending on the categories, sometimes at the same airport), different conditions to access the market (free access/tender procedure or existence/absence of national approval procedure). Some stakeholders therefore raised the issue that the EU groundhandling market is complex and that disparities between national markets make it difficult for new comers to enter a new market. It could thus be questioned if, in the framework of a possible revision of the directive, simplification and enhanced harmonization would not be desirable.

This leads to consider the issue of *what* would need to be harmonized in the EU groundhandling market.

In this context, a specific option of further harmonization of the groundhandling market could be to require complete opening of the market for all EU airports, removing the current possible limitations in the number of airside groundhandling providers. It would indeed ensure that, throughout Europe, groundhandlers can enter anytime the market of any airport (above a certain threshold).

**(20) What would be for you the advantages and disadvantages of harmonizing the European groundhandling market? Which specific aspects would you suggest to harmonize? Please specify the advantages and disadvantages of your suggestions as well as their economic, social and environmental impacts.**

[See answer to Question \(21\)](#)

**(21) What would be for you the advantages and disadvantages of a full opening of the market (for airports above a given threshold)? Please specify economic, social and environmental impacts.**

[The existing arrangements have worked well at Gatwick Airport and there is competition between providers of ground handling services. We see no compelling reason for further regulatory intervention on the grounds of harmonisation. Any changes should focus on areas such as making explicit that airports can introduce minimum quality standards \(see the response to Question \(5\)\) – that would boost competition between airports and provide direct benefits for passengers.](#)

##### **Threshold level for application of the Directive:**

Some stakeholders reported that annual fixed levels cause problems for airports oscillating around that threshold. To avoid that problem, a mechanism could be envisaged whereby the airport has to fall above the threshold for 3 consecutive years in order to be subject to the relevant provisions of the Directive.



In addition, in the case where the system of a minimum number of groundhandling providers for airside services would be kept, the question of introducing additional thresholds was raised. Indeed, even if the minimum number of groundhandling providers sustainable at an airport depends in fact on many factors (such as the type of traffic of the airport, the fact that the airport is a hub or not, etc.), the Directive makes it possible at the moment that, all else being equal, an airport with 3 millions passengers has to accommodate the same number of minimum providers as an airport with more than 50 millions passengers (Member States can indeed limit to 2 the number of suppliers for these airports). Some stakeholders therefore proposed, in order to avoid that the number of groundhandling providers could be underestimated at very big airports, to increase the number of minimum suppliers for these very big airports to at least 3 or 4, depending on the airport's size. This would be possible by introducing additional thresholds such as (threshold levels are only illustrative): minimum 3 groundhandling providers for each airside category at airports with a traffic over 30 millions passengers or 100 000 tons of freight; minimum 4 providers at airports with a traffic over 60 millions passengers or 250 000 tons of freight.

**(22) What would be for you the advantages and disadvantages of the proposed mechanism (or any other mechanism that you might propose) to avoid airports oscillating around the threshold? Please specify the economic, social and environment impacts.**

[See answer to Question \(23\)](#)

**(23) What would be the advantages and disadvantages of introducing additional thresholds for the minimum number of groundhandlers for very big airports? What threshold(s) would you suggest? Please specify economic, social and environment impacts.**

[We have no objection to the Commission's proposal that an airport should fall above the minimum threshold for 3 consecutive years before the Directive applies.](#)

[It is not clear that there would be any significant advantages in complicating the Directive by adding more thresholds or tiers. In particular, where the number of ground handlers is restricted at large or very large airports this is presumably objectively justified in terms of safety or constraints on capacity, which would remain regardless of modifications to the Directive, and so further tiers or thresholds would have no real impact on competition.](#)

**Member State approval procedure:**

Approvals (article 14 of the Directive) are not compulsory but have been widely introduced by Member States. However they differ across Member States (some deliver approvals per category of ground handling activity, others per airports of operations etc.).

A refinement of the criteria to obtain an approval could be introduced to limit the divergence of what is required to perform a groundhandling activity. But the criteria could also be changed, and additional criteria, not mentioned in the current directive, introduced. They could include for instance training provisions or quality measures.

**(24) What would be the advantages and disadvantages to refine the conditions to obtain an approval? Please specify economic, social and environment impacts.**

[See answer to Question \(25\)](#)

**(25) What would be the advantages and disadvantages to change the criteria taken into account for approval? How about including training provisions or quality measures? Please specify economic, social and environment impacts.**

[The existing approval processes work well at Gatwick Airport and so further changes to the Directive in relation to these matters do not seem necessary or appropriate.](#)



## 5. DEFINITIONS REQUIRING CLARIFICATION:

### Self-handling

The principle that carriers have the right to handle their aircraft, referred to as self-handling, is generally acknowledged. However, it has been raised by some stakeholders that the scope of what should be considered as self-handling could be clarified or amended, in particular with respect to industry practices such as wet lease, dry-lease, code-sharing, alliance arrangements.

**(26) What would be the advantages and disadvantages to refine the boundaries of self-handling? Please specify economic, social and environmental impacts.**

The definition of self-handling has not caused any undue difficulties at Gatwick Airport.

### Freight handling

Freight handling definition has been raised by stakeholders as causing problems: the handling of certain types of air freight (coffins, art work, etc.) usually involves specific actors, which may not be selected freight handlers in the meaning of the Directive as they only operate punctually at the airport. Integrators face similar problems: few handlers are capable to play a part in the specialised process of handling express cargo, and not all handlers are capable of operating at the time integrators require their services, mainly at night. As a consequence, these companies have little choice than to organise their own on-loading or off-loading.

**(27) What would you suggest to improve the handling of freight? Please specify the advantages and disadvantages of your suggestions, and their economic, social and environmental impacts.**

We are not aware of any evidence that suggests there are significant difficulties with freight handling at Gatwick Airport.

### Groundhandling category 1

Groundhandling category 1 (ground administration and supervision) is described in the Annex of the Directive and comprises a wide range of activities. It indeed encompasses administrative tasks as well as "telecommunications", "handling and storage of unit load devices" and "any other supervision". Some Member States mentioned that this definition could be clarified, in particular when it comes to delivering approvals to undertakings falling under this category.

**(28) What would you suggest in order to clarify or amend the definition of "ground administration and supervision"? Please specify the advantages and disadvantages of your suggestions, as well as their economic, social and environmental impacts.**

The definition of ground administration and supervision has not caused any difficulties at Gatwick Airport.

### Centralized Infrastructures

Centralized infrastructures are not defined explicitly in the Directive, but refer to infrastructures used for the supply of groundhandling services whose complexity, cost or environmental impact does not allow of division or duplication. Usage of these infrastructures can be made compulsory by Member States. It has to be recognized that centralized infrastructures across Europe are of different nature, depending on the airport's location in the European Union. This has significant impacts as the introduction of these infrastructures at an airport reduces the contestable market.

In addition, the way in which the managing body of these infrastructures (which can be the airport or "another body") is designated is not clear, as the Directive only states that "Member States may



reserve [for this body] the management of the centralized infrastructures". In particular, when it comes to the "reservation" of an installation as "centralized infrastructure", clarifications could be made on the role of the "managing body of the centralized infrastructures", whether it is the airport or not. And in the specific case where the "managing body of the centralized infrastructures" is not the airport, the respective roles of this body and the airport could also be addressed.

**(29) What would you suggest in order to clarify the concept of Centralized Infrastructures and improve the way these infrastructures are managed? Please specify the advantages and disadvantages of your suggestions, as well as their economic, social and environmental impact.**

Given the differences between airports then there would be significant advantages in leaving it to the airport or relevant competent authority to decide what constitutes centralized infrastructure. In particular, there is a strong case for allowing check-in facilities to be part of the centralized infrastructure, with centralized check-in having the potential to drive efficiency and improvements in the quality of service to passengers. See also response to Question (10).

As for improving management and the passenger experience it should be clear that the airport can impose minimum quality of service standards on ground handlers (see response to Question (5)).

## **6. OTHER ISSUES TO WHICH YOU WOULD LIKE TO DRAW OUR ATTENTION**

**(30) What are the other issues with the Directive you would like to draw to our attention?**

None

## **7. ASSESSMENT OF IMPACTS**

The study will assess these potential changes using the Commission's impact assessment framework, in particular identifying:

- Social impacts;
- Economic impacts;
- Environmental impacts;
- Administrative impacts;
- Quality impacts;

The study will also establish if any of these impacts disproportionately affect the Small Medium Enterprises operating in the sector.

**(31) Could you suggest sources of data and information which might be used by the study team to estimate the impacts of options for changes to the Directive?**

**We would be particularly interested in data and facts covering the impact of the Directive on:**

- **Changes in profitability of ground handling providers;**
- **Staff wages, levels and contract types;**
- **Staff qualifications and training provisions;**
- **Health and safety of workers;**
- **Staff transfer issues;**
- **Number of providers and length of service of incumbents;**
- **Quality levels in tenders;**

These matters are best addressed by ground handlers and airlines.