Comment Response Document

Summary

1 The Civil Aviation Authority (CAA) publishes CAP 642 concerning the essential elements necessary to create a safe environment for aircraft manoeuvring on the ground and for personnel working airside.

The comments in this Comment Response Document (CRD) refer to CAP 642 which was last updated in September 2006 and has been substantially revised due to:

• Guidance which has been withdrawn in lieu of CAP 790 Requirements for an Airside Driving Permit (ADP) Scheme

• Guidance on airside development and the management of airside works withdrawn in lieu of guidance contained in CAP 791 Procedures for Changes to Aerodrome Infrastructure;

• The removal of 'Model Instructions' - where applicable, the relevant information has been provided within the relevant Chapters;

• New guidance on aircraft turnround operations, apron/aircraft stand design and airside vehicle standards;

• Updated guidance concerning training and safety performance, and the general principles of health and safety and managing the risks, which was largely amended by the Health and Safety Executive.

This amendment of CAP 642 Airside Safety Management has been developed jointly by a sub-group of the CAA Ground Handling Operations Safety Team (GHOST) and the Health and Safety Executive (HSE), which comprised the CAA, the HSE, airport operators and ground handling organisations. Following consultation on the proposed changes, the CAA has now reviewed all the comments. The many comments received reflect the level of interest from stakeholders concerning the review; the CAA is pleased to publish this Comment Response Document (CRD).

However, CAP 642 will not be published immediately, for two reasons. Firstly, the HSE is reviewing its document HSG 65 (Successful Health and Safety Management). Secondly, a GHOST sub-group is examining the risks associated with approaching aircraft with engines running in order to connect ground power. The output from these two activities is likely to affect the draft CAP 642. Accordingly, a further review of the CAP will be undertaken. The CAA will consider the need to re-consult on these changes in due course.

2 Comments were received from:

Argent Risk Management Consulting	Health and Safety Executive (HSE)
Belfast International Airport	Heathrow Airport Ltd
Bristol Airport	Leeds Bradford International Airport
British Airline Pilots Association	Manchester Airports Group
British Airways	Newcastle International Airport
Exeter International Airport	Norwich International Airport
Gatwick Airport Ltd	Servisair UK Ltd
Guernsey Airport	Stobart Air

The CAA thanks contributors for their comments and input to this consultation.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
1	Revision History, Issue 3	"*This edition contains new material in respect of Apron and Stand Design (Chapter 3), Aircraft Turnround (Chapter 4), Airside Vehicle Standards (Chapter 5) and Human Factors (Chapter 8).*" There is no Chapter 8 as is mentioned in the 'Contents'.	Noted	The HF chapter is on hold, subject to publication of the CAA HF Strategy, and further work by the GHOST HF Sub-Group.
2	References, Section 2 Legislation	Include Personal Protective Equipment at Work Regulations 1992, The Dangerous Substances and Explosive Atmospheres Regulations 2002, The Health and Safety (Consultation with Employees) Regulations 1996, The Safety Representatives and Safety Committee Regulations 1977.	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
3	References, Section 3 Reference Documents	The list contains some out of date or cancelled documents	Accepted	These have been corrected where they have been pointed out. They will be checked again at final proof reading.
4	References, Section 4 HSE – Further Information and Guidance	Include : Consulting workers on health and safety, Lighting at Work, Personal Protective Equipment, Dangerous Substances and Explosive Atmospheres, Storage of flammable liquids in tanks	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
5	Glossary and Definitions	Whilst there is a definition of an "apron", the document then starts to introduce the word 'Stand' without giving this a definition, in the aviation community the use of the word stand is more prevalent (rightly or wrongly) than the use of the word apron. The guidance document should either seek to reflect current industry used terminology or quash the use of non standard terminology, it should not attempt to do both.	Accepted	A definition for a stand has been added.
6	Glossary and Definitions	Definition of PUWER is Provision ***and Use*** of Work Equipment Regulations	Accepted	The reference to PUWER Regulations has been amended.
7	Glossary	CDG Road' should be defined **'**The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009'. 'ANO' should be defined 'The Air Navigation Order 2009'	Accepted	The Glossary has been updated to reflect the ANO in order to provide the appropriate reference to Dangerous Good regulations.
8	Glossary	Include AOC - Airport Operator Certificates	Noted	On hold, subject to further review by HSE post-HSG65 publication.
9	Glossary	**NOTAL** Notice to Aerodrome Licensees – These have been replaced with Information Notices, Safety Notices etc. and there does not appear to be any reference to NOTALs in the document.	Noted	All detail in NOTALs has been incorporated, where applicable. Further reference to NOTALs shall be removed.
10	Glossary	A-VDGS, AGNIS, MARS, MCA, PAPA, PAPI and SEG are not in the Glossary.	Accepted	The glossary will be amended.
11	Glossary – Page 9	NOTAL – does this need to be removed ?	Noted	All detail in NOTALs has been incorporated, where applicable. Further reference to NOTALs shall be removed.
12	Glossary – Page 9	ANO - Air Navigation Order 2005 – is this the most recent date ?	Noted	References to the ANO and other CAA documentation will be updated.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
13	Introduction, Section 1 Origin and History, para 4	**HSE does not advocate** 'gold plating' advice and guidance when good practice is sufficient. Guidance is **not** limited to explanation of the requirements to meet the law. HSE is also interested in publicising good practice which is used to describe action that is compliant. Where it is appropriate to describe best practice, it will need to be identified as such so as to distinguish it from what is necessary for legal compliance. To secure an appropriate statement of support from HSE for inclusion within the document, the final document will need clearance from HSE's Publications Governance Group. This may take some time.	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
14	Introduction, Section 2 Purpose	Scope seems far too broad. It attempts to cover all aspects and subjects related to airside safety. This causes it to overlap and potentially conflict with many of the laws, regulations and guidance listed in the 'References' section, whilst lacking much of the detail and focus provided in these individual documents.	Noted	The scope is less wide than the current version, and focuses on apron safety.
15	Introduction, Section 2 Purpose	XXX welcome the clear guidance in para 4 in relation to delegation, accountability and responsibility which is particularly directed towards Ground Service Providers (GSPs) and airlines with contractual relationships for provision of services	Noted	
16	Introduction, Section 3 Applicability	The document is often unclear which type of organisation or business it is addressing. Some sections clearly deal with aspects of the ramp operation or facilities that are sole responsibility of the aerodrome operator, whilst others may apply to either the airline operator or the ground handler. Whilst some aspects of airside safety management clearly require a joint approach, there is often little detailed guidance in this document regarding the CAA/HSE expectations of each party. This could lead to a misunderstanding of responsibilities. It's not clear how this document would apply to a UK air carrier's operations outside of the UK (or to a foreign carrier's operations in the UK).	Noted	The CAA will enhance the introductory pages in order to provide clarity as to the status and applicability of the guidance.
17	Introduction, Section 3 Applicability	Clear statement of the recommendation for establishment of an SMS regardless of CAA regulatory oversight is welcomed, particularly to advance their adoption with GSPs.	Noted	
18	Introduction, Section 3 Applicability	For the purposes of the Health and Safety at Work etc Act 1974 (the HSW Act) include protecting people other than those at work from risks to their health and safety arising out of or in connection with the activities of people at work – including those working airside. Section 3 of the HSW Act places general duties on employers and the self-employed towards people other than their employees, eg passengers, air crew etc. CAP 642 therefore has wider applicability to people other than those working airside.	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
19	Introduction, Section 4 The Status of CAP 642 Airside Safety Management	Most or all of the subjects addressed in CAP 642 are already covered by detailed UK legislation and industry guidance documents. Any gaps would be better addressed by publishing specific guidance documents that focus on a particular aspect of UK ramp safety (for example, Chapter 7 includes much of the CAP 790 content)	Noted	A cross-reference task will be carried out prior to publication.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
20	Introduction, Section 5 Compliance with Statutory Requirements, para 2	See above - HSE also has responsible for securing adequate provisions for people other than those at work from risks to their health and safety arising out of or in connection with the activities of people at work.	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
21	Introduction, Section 5 Compliance with Statutory Requirements	Statement of clear distinction between HSE and CAA is extremely helpful. XXXX suggests adding that despite 2 regulators having oversight of broad safety issues, by definition just one SMS should be adopted that has remit across the full scope of safety.	Noted	
22	Chapter 1	Within Key Legal duties, it would be helpful to document responsibility for passenger safety at each stage of their journey as we regularly experience airlines and their ground handlers passing the buck between them or attempting to pass responsibility to the aerodrome. It's appreciated that the aerodrome have a responsibility to ensure they are reassured that all parties are operating safely but that task is exceedingly challenging when individual parties will not admit the extent of their responsibility.	Accepted	The CAA, together with the HSE, will consider this aspect and provide details of the key legal responsibilities.
23	Chapter 1, Introduction, para. 1.1	"*and personal injuries on the ramp*". – Suggest: "personal injuries in **airside areas**." "**on the airfield" or "Airside".** CAP 642 is not only relevant on the ramp.	Accepted	The paragraph has been amended.
24	Chapter 1, para 1.1	See above - HSE also has responsible for securing adequate provisions for people other than those at work from risks to their health and safety arising out of or in connection with the activities of people at work.	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
25	Chapter 1, para 1.2	Reference to uninsured costs of accidents is now out of date. Suggest replacing with [1]'New estimates show the total cost associated with workplace injuries and ill health (excluding occupational cancers) in Great Britain to be some £14 billion in 2009/10'	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
26	Chapter 1, para 1.2	The HSE study in question showed that all indirect uninsurable costs of accidents can be a factor of up to 36 times greater than the direct costs, including the costs of insurance premiums. This is different to what is currently stated.	Accepted	The CAA will refer to new HSE HSG65 and cross-refer to ensure consistency.
27	Chapter 1, para 1.5	HSG 65 'Successful Health and Safety Management' is being significantly revised and replacement guidance is due to be re-published in the Autumn 2012.	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
28	Chapter 1, para 1.6	References to the current HSG65 key elements to health and safety management should be removed as there may be confusion to such references/terminology following publication of the new edition. The current five steps of health and safety management 'policy, organising, planning and implementing, measuring performance, auditing and reviewing performance' are to be replaced with 'plan, do, check and act'.	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
29	Chapter 1, para 1.7	HSG65 focuses on H&S only. SMS focuses on both H&S and Aircraft Safety, maybe worth including reference to ICAO 9859 in relation to aircraft safety.	Accepted	Doc 9859 will be referenced accordingly.
30	Chapter 1, Introduction, para. 1.8	"*should include proactive monitoring, such as inspection,*" *Suggest:* should include proactive monitoring, such as inspection **and leading performance indicators**"	Accepted	The paragraph has been amended.
31	Chapter 1, para 1.9	XXX welcomes the guidance in relation to management system in relation to an integrated SMS and not only does it "not follow that organisations require separate systems to manage the safety of aircraft and occupational health and safety" but systems theory and the embedded concept of continuous improvement would urge companies to rationalise into one system that meets the requirements of both aspects of safety. By definition!	Noted	
32	Chapter 1, para 1.10	See above – 1.1 – organisations and individuals should also be clear whether they are considering issues affecting people other than those at work.	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
33	Chapter 1, Section 2, para 2.1.1	Definition made for SFARP, but not for ALARP. This is inconsistent.	Accepted	A definition has been added.
34	Chapter 1, Introduction, para. 2.1.3	"*the more reasonable it is to go to greater expense, trouble and invention to reduce it.*" Suggest: "the more reasonable it is to go to greater expense, **resource and innovation** to reduce it."	Accepted	The paragraph has been amended.
35	Chapter 1, Introduction, para. 2.1.3	"*It is important to remember that the judgment is an objective one and the size or financial position of the employer is immaterial.*" Suggest: "It is important to remember that the judgment is an objective one and the **complexity** or financial position of **a company** is immaterial."	Accepted	The paragraph has been amended.
36	Chapter 1, Introduction, para. 2.2.3	"*Risk assessments should be undertaken on a regular basis as circumstances change,…*" Suggest that this section refers to the legal requirements associated with risk assessments, e.g. 3 year renewal/review.	Not accepted	HSE Legislation already applies in this area.
37	Chapter 1, para 2.2.4	Include 'review your assessment and update if necessary'	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
38	Chapter 1, Section 2. para 2.3.4	Is this method consistent with the 'bow-tie' methodology which is starting to be used with the CAA where an unwanted occurrence is identified and events / escalators identified and measures as barriers described? The document should seek to identify current best industry practice in risk assessment and the articulation of such,	Noted	The 'Bow-Tie' modelling is just one method of identifying hazards, top events, identifying threats and consequences. In essence these are all constituent parts of an SMS/Risk Assessment model. This method is consistent with the 'Bow-Tie' model.
39	Chapter 1, para 2.3.6	Amend to 'Under health and safety law, consideration must be given to the risks to the health and employees from other organisations and people other than those at work from risks to their health and safety arising out of or in connection with the activities of people at work.	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
40	Chapter 1, para 2.3.7	To ensure consistency with MHSWR Schedule 1 – amend: 4th bullet – adapting the work to the individual especially as regards the design of workplaces, the choice of work equipment and the choice of working and production methods, with a view, in particular, to alleviating monotonous work and work at a predetermined work-rate and to reducing their effect on health 9th bullet – giving appropriate instructions to *employees*	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
41	Chapter 1,Section 2. para 2.3.10	The aerodrome operators should also engage in dialogue with those other parties which may be affected by a change in procedure and not just the CAA, this would follow the HSE guidance to involve all affected parties in a joint risk assessment. This is covered at 2.3.11, but not stated in 2.3.10 as a step in introducing mew procedures.	Accepted	The paragraph has been amended.
42	Chapter 1, para 2.3.11	See comments re: Chapter 4 Aircraft Turnround	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
43	Chapter 1, para 3.1.2	Amend 1st sentence: It is an employer's duty to protect the health, safety and welfare of their employees and others who might be affected by their business. Self-employed people must conduct their work in such a way to ensure their own health and safety and that of others. Employers and self-employed must do whatever is reasonably practicable to achieve this.	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
44	Chapter 1, para 3.1.4	Amend to include 'All employers and self-employed people involved should satisfy themselves that the arrangements adopted are adequate'	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
45	Chapter 1, Section 3, para 3.1.5	Not all airports have trade union affiliation and in order to address this paragraph more effectively it may be better to slightly amend the words as follows '...employees, and where appropriate any trade union safety representatives...'	Accepted	The paragraph has been amended.
46	Chapter 1, Section 3, para 3.1.6	It would be useful to identify where the CAA believes an aerodrome licence holder (and landlord) sit in the scale of responsibility. As the CAA issue licences through CAP 168 it should be possible to state the level of responsibility of the licence holder for the activities of those conducting business on their property.	Noted	Noted. CAP 168 Chapter 2 Appendix 2F set out the responsibilities of the Aerodrome Licence Holder concerning third parties operating within the CAA Licensed Boundary. We do not consider it necessary to duplicate this guidance in 642. No further action or comment required.
47	Chapter 1, para 3.1.7	Amend to include 'employees must take reasonable care for their health and safety and that of others while at work and co-operate with their employer to enable the employer to carry out their legal duties'	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
48	Chapter 1, para 3.3	Maybe worth referencing HSG 159 'Management of Contractors'	Accepted	The paragraph has been amended.
49	Chapter 1, para 3.3	The guidance in relation to control of contractors will be positively received by industry as many of our clients turn to XXX and our sister organisation XXX for a clear determination on this particular matter	Noted	
50	Chapter 1, para 3.5.1	See comments re: Chapter 4 Aircraft Turnround. This section could perhaps more helpfully outline the general requirements of MHSWR 'Co-operation and co-ordination'	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
51	Chapter 1, para 3.5.1 b	"*For construction work, a health and safety plan may be required by health and safety law.* " Suggest that this sentence is placed at the end and not near the beginning of 3.5.1 as the other content is more applicable to airport operations.	Accepted	The paragraph has been amended.
52	Chapter 1, Section 3, para 3.6.1	Monitoring recommendations does not clearly identify if this is the responsibility of the aerodrome licence holder, the operator or the GHA, if not stated what best practice looks like you may end up with everybody, just certain parties or nobody monitoring things. If it as a responsibility of all parties to monitor then there must be common standards to monitor against, objective and not subjective.	Accepted	The paragraph has been amended.
53	Chapter 1, para 3.6.1, page 22	Aerodrome rules, as well as procedures, should be in place to ensure that these rules are complied with and should be clear to all working on the aerodrome. Suggest additional word "and" in above sentence.	Accepted	The paragraph has been amended.
54	Chapter 1, Section 3, para 3.6.2	Should the person monitoring not only be trained, but "qualified" to perform the task to align with the qualifications outlined in CAP700?	Accepted	The paragraph has been amended.
55	Chapter 1, Section 3, para 3.6.2	It is not enough to identify unsafe practices, the person monitoring should also be empowered to stop unsafe activities.	Accepted	The paragraph has been amended.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
56	Chapter 1, para 3.7	See comments re: Chapter 4 Aircraft Turnround	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
57	Chapter 1, para 3.7	"*Control of Contractors during Turnround"* This title could be more accurate, e.g. Control of 3rd party Contractors or Control of Ground Handling Service Providers'	Accepted	The paragraph has been amended.
58	Chapter 1, para 3.8 – Aerodrome Operator, 3.8.3 and 3.8.4	"*The aerodrome operator must provide an aerodrome which is safe for aircraft and people to use, as far as reasonably practicable. 3.8.4 This includes: Systems of work which ensure safety, such as* ***an aircraft turnround plan*** *or 'hot work' permits for contractors.*" No, this is not a document which is normally the responsibility of an aerodrome operator. The airline should be responsible for producing this. Sometimes contracted to handling agent.	Accepted	The paragraph has been amended.
59	Chapter 1, para 3.8 – Aerodrome Operator, 3.8.6	"*Properly planned and executed aircraft turnrounds;*" Aerodrome Operators do not plan and execute aircraft turnrounds. This is a valid item for inclusion in the list of precautions to protect aircraft and people but it should be in the Aircraft Operators and Handling Agent (Service Providers) section.	Accepted	The paragraph has been amended.
60	Chapter 1, para 3.8.8	XXX would urge SRG to require aerodromes to take a greater role in the SMS incident/accident reporting (under MOR level) where any issue on the aerodrome MUST also be reported into the aerodrome SMS (as practiced say by XXX Airport) as this will enable the more reliable collection of data and collaboration for predictive intervention purposes. GHOST certainly sees the value in improved quality of data though the onus on aerodromes is obvious and airports not engaged in this already will not elect to do so.	Not accepted	CAP 382 and other reporting processes are well established.
61	Chapter 1, para 3.9 – Aircraft Operators (Airlines) and 3.10 – Service Providers	These sub-sections are relatively short in comparison to 3.8 – Aerodrome Operators. Section 3 is called 'Key Legal Duties' but these sections do not appear to focus on this and their relatively short content implies that CAP 642 is aimed at Aerodrome Operators and that Airlines and Service Providers have little or few 'Key Legal Duties' regarding Airside Safety. Suggest that this section is re-written with a clear focus on the Legal Duties of all airside users not only Aerodrome Operators.	Not accepted	The CAA considers the format and organisation of the document to be acceptable as drafted. However, in order to improve the document, it will be reviewed further during the proofing and quality assurance stages.
62	Chapter 1, Section 3, para 3.9.2	IATA have published a Ground Operations Manual (IGOM) and this section should make reference to the document and encourage operators to adopt a standard method of operation to simplify the ground handling activities and remove confusion	Accepted	The IGOM is referenced in the Chapter 4. Where applicable, the IGOM is referenced, but in general, the CAA has chosen not to reproduce or duplicate content.
63	Chapter 1, para 3.10	See comments re: Chapter 4 Aircraft Turnround	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
64	Chapter 1, para 3.10 – Service Providers	Does this include Ground Handling Organisations? There is a suggestion in 3.10.2 that this is not the case? This sub-section is far too small and does not focus on the legal duties of service providers in the same amount of detail as the aerodrome operator section. There is also a tendency for this whole section to offer suggestions of factors or issues which may have an impact on safety in a rather vague manner.	Noted	The CAA does not see further action being required. Ground handling organisations and service providers work to their airline contracts, and where applicable the IGOM, whereas CAP 642 states high level considerations.
65	Chapter 1, para 3.10.1	"*Contractors on the apron are often required to work to tight timescales to complete their respective tasks in the time allowed for aircraft turnround.*" There is a suggestion that tight timescales are a cause for airside safety to be diminished. This is not proven and the lack of urgency in some cases has led to complacency and an erosion of safety margins.	Accepted	The paragraph has been amended.
66	Chapter 1, para 3.10.1	This whole paragraph is rather weak. There are many other examples of taking account of each other's needs and these should be included, in the correct section, preferably as a list of risks, hazards and mitigations specifically related to service providers, including GHOs.	Not accepted	Hazard identification and analysis is an intrinsic part of an operator's SMS.
67	Chapter 1, Section 3, para 3.10.2	The first sentence says Service providers should coordinate with 'them' but doesn't state who the 'them' are, please identify and clarify.	Accepted	The paragraph has been amended.
68	Chapter 2	Nothing to add	Noted	
69	Chapter 2	Standardised handling practices are dependent on IATA IGOM outcomes and this chapter should supplement those with the safety considerations only or it is in danger of redundancy or being out of step.	Accepted	The IGOM will be referenced in the document, however the IGOM content shall not be replicated.
70	Chapter 2 (and elsewhere) Model / best practice ramp procedures	For best practice ramp procedures, we suggest that carriers and regulators should participate in and support the IATA IGOM initiative and follow this IATA document as best practice. Industry standardisation provides significant safety benefits, particularly where UK ground handlers currently have a number of UK and international airline customers with varying procedures and policies. Many of the procedures detailed in this document conflict with IGOM, which could prevent or delay IGOM adoption in the UK.	Accepted	New text has been added in the Introduction at paragraph 10.
71	Chapter 2, para 1.2	"*The hierarchy of controls outlined in Chapter 1 should be referenced when considering the most appropriate combination of control measures.*" Where is the 'hierarchy of controls' referred to here? This is the only use of this phrase in the whole document. The hierarchy referred to in Chapter 1 is not easily identified. This should be more accurately identified in the Chapter.	Accepted	The paragraph has been amended.
72	Chapter 2, para 2.1	"*Failure to do this may result in short cuts and bad practice which can lead to accidents, ill health and damage to assets.*" Suggest this should read: "Failure to do this may result in short cuts and bad practice which can lead to accidents, injury and damage to assets."	Accepted	The paragraph has been amended.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
73	Chapter 2, para 2.2	*"Hazards to passengers and staff on the apron;"* This item is too generic in a list of more specific hazards or at least some examples of the hazards. What examples of 'falling objects' are considered "common"? "*Operation of airbridges*" is not a hazard in itself. "*Faults and Defects*" – of what specifically?	Accepted	The paragraph has been amended.
74	Chapter 2 , para 2.3	Consider including this detail in Chapter 1 after 2.3.5 – for example the need for good health and safety management, to co-operate and co-ordinate activities etc	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
75	Chapter 2, para 3.1	*"Airside Vehicles"* do not "*constitute an ever present hazard"*. When they are being driven, the drivers' behaviour may present a hazard, suggest: "Vigilance is necessary for all those working airside to be aware of the potential hazards associated with vehicle movements".	Accepted	The paragraph has been amended.
76	Chapter 2, para 3.3	*"Any changes to the layout of an aerodrome"* – does this mean *any* changes? – CAA do not wish to be involved in every minor change to an equipment area? This needs to be clarified to remove the potential for misinterpretation so that CAA are only contacted about the changes referred to in CAP791.	Accepted	The paragraph has been amended.
77	Chapter 2, Section 3, para 3.3	Merge Paragraph 3.4 with 3.3.	Accepted	The paragraph has been amended.
78	Chapter 2, para 3.5	"*Some aerodromes have service delivery systems built into the stands, thus…*" Suggest an example is provide: "e.g. Fuel Hydrants or Fixed Electrical Ground Power, "	Accepted	The paragraph has been amended.
79	Chapter 2, Section 3, para 3.6 pg 27	In relation to regular monitoring, what will be considered regular, will that be determined by the aerodrome?	Partially accepted.	The operator's SMS should determine the periodicity of 'regular' based on the risk-assessment and change process.
80	Chapter 2 , para 3.7	See comments re: Chapter 4 Aircraft Turnround	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
81	Chapter 2, para 4.1	"*…passengers are vulnerable and generally unaware of the dangers around them.*" Suggest: "…passengers are vulnerable and **may be** unaware of the dangers around them."	Accepted	The paragraph has been amended.
82	Chapter 2, para 4.3	"*Where the provision of airbridges is not reasonably practicable, the aerodrome operator should…*" Airbridges are not provided for safety reasons, they are for customer service. At some airports they are provided but airlines choose not to use them. Therefore this paragraph needs rewording to remove this assumption. Suggest: "Where airbridges are not provided, the aerodrome operator should…"	Accepted	The paragraph has been amended.
83	Chapter 2, para 4.4	Better to say "may" rather than "**will** include the following measures"	Accepted	The paragraph has been amended.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
84	Chapter 2, para 4.4	There are 2 paragraphs 'C'.	Accepted	The paragraph has been amended.
85	Chapter 2, Section 4, para 4.4(a)	Seems to allow an option for the Ground Handler to choose handling requirements, but this could contradict DfT Topping and Tailing requirements.	Accepted	The paragraph has been amended.
86	Chapter 2, Section 4, para 4.4(c)	There are two 'c)' in this column	Accepted	The paragraph has been amended.
87	Chapter 2, Section 4, para 4.4(c)	The latter part of this wording creates ambiguity on the Ground Handlers responsibility for pax handling and could allow them to argue that the Airport Authority should be physically helping them when they are short staffed, when staff shortfall is often the consequence of contractual agreements between the GHC and airline.	Partially accepted	The text has been amended, but the responsibilities for each party remain unchanged.
88	Chapter 2, para 4.4d	PIGS = Passenger Inert Guidance System? Or PiGS = Passenger Guidance System. This is the first time we have seen the word 'inward' used in relation to these units. What does the 'inward' specifically refer to?	Accepted	PGS will be used as the collective noun.
89	Chapter 2, para 4.6	The responsibility for passenger safety between the aircraft and terminal building is normally that of the handling agent. The staff and supervision is provided by the handling agent. It is not an aerodrome operator responsibility. This view is affirmed by the last sentence of para 4.7 which seems to contradict the first sentence of para 4.6.	Noted	Under the Warsaw Convention the (air) carrier is liable for damage sustained in the event of the death or wounding of a passenger or any other bodily injury suffered by a passenger, if the accident which caused the damage so sustained took place on board the aircraft or in the course of any of the operations of embarking or disembarking." However, specific legal responsibilities may be different depending on local circumstances.
90	Chapter 2, Section 4, para 4.7	Last sentence does not read well and needs more context as to what it means.	Accepted	The paragraph has been amended.
91	Chapter 2, para 4.7	"*Furthermore, when passengers have checked in and are proceeding to the aircraft, it is the responsibility of the airline or handling agent to escort them safely there.*" This is correct except when the passenger has reduced mobility. In that case, it is the Aerodrome Operator who is responsible. At most UK locations, this service is currently contracted out to a specialist service provider.	Accepted	The paragraph has been amended.
92	Chapter 2, para 6.1.4	"*it is usually the responsibility of the handling staff to ensure that the stand and clearways are free from obstructions, FOD, and vehicles or equipment.*" Vehicles are entitled to wait in clearways when aircraft arrive – not to be parked but wait with the driver in attendance.	Accepted	The paragraph has been amended.
93	Chapter 2, para 6.1.4, page 30	Add – Person to be located next to Emergency Stop	Accepted	The paragraph has been amended.
94	Chapter 2, Section 6.1.4	Would sit better as part of 6.2	Accepted	Paragraph moved.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
95	Chapter 2, para 6.1.5	See comments re: Chapter 4 Aircraft Turnround	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
96	Chapter 2, para 6.1.6, page 30	Add – Chocks and Cones.	Accepted	The paragraph has been amended.
97	Chapter 2, para 6.1.8	The principal methods of stand configuration are angled nose-in, angled nose-out and parallel-parking; These are not 'methods'. Suggest "layouts" instead.	Accepted	The paragraph has been amended.
98	Chapter 2, Section 6, para 6.1.8	The section flips between the word 'Apron' and the word 'Stand' and without the definition missing from the glossary it indicates that the two things may be different. Standardise the word used or make it interchangeable in the glossary.	Accepted	Stand' has been added to the definitions of terms used in the CAP.
99	Chapter 2, para 6.1.9	"*…there is an increased potential safety threat to buildings, installations, vehicles, equipment and personnel and passengers which must be controlled and managed.* "Potential safety threat" = hazard? And if this means jet-blast, suggest it states "jet blast"	Accepted	Text amended to state 'Jet Blast'.
100	Chapter 2, para 6.1.11	a) Is CAA permitting/encouraging the use of the ACI Handbook? The ACI handbook contains many continental designs/styles which may not conform with CAP 168 requirements. c) affected by significant jet blast – low speed jet blast is no stronger than normal wind speeds – it is only a problem when it is significant. Equipment parking areas do not need protecting form blast and need to be on or near stands, not remote from them. e) It is more accurate to say that the organisation doing stand allocation need to be advised of the aircraft sizes permitted on stands, rather than the more generic "safety instructions should be issued"	Noted	The CAA acknowledges this. Reference to other industry accepted guidance documents may also be used.
101	Chapter 2, para 6.1.12	6.1.12 b) – there is no need for the *"as soon as a tug crew is assigned a task"* How this is done depends on local procedures. It is not clear what this paragraph is trying to say – "Clearance for ground moves need to be obtained by the tug driver from ATC"? 6.1.12 e) Is it important to know the POB? We haven't heard of this and doubt it is required. This paragraph is not clear. Suggest it is re-written.	Accepted	The paragraph has been amended.
102	Chapter 2, para 6.2.2	There is no need to promulgate VDGS serviceability by NOTAM. It should be either obvious to the pilot on arrival or ATC advises the pilot.	Accepted	The paragraph has been amended.
103	Chapter 2, pages 33 and 39	Paras 6.3.3 and 6.5.3 do not align	Noted	This is on hold, subject to the conclusions of the GHOST Sub-Group looking at the process of approaching aircraft whilst engines are running.
104	Chapter 2, Section 6, para 6.3.3	Clarification on subject is welcomed, but it's our opinion that a Risk Assessment should always be in place for approaching a live aircraft – regardless of the dispensation in the outlined situation.	Noted	This is being examined by a sub-group of the GHOST, together with HSE input.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
105	Chapter 2 , para 6.3.3	See comments re: Chapter 4 Aircraft Turnround	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
106	Chapter 2, para 6.3.3	"*However, under certain operational circumstances and/or for emergency (aircraft) operational reasons, the approaching of aircraft for the purpose of connecting Fixed Electrical Ground Power (FEGP)/Ground Power Units (GPU) whilst anti-collision lights remain illuminated and when aircraft engines are running may be acceptable.* " Acceptable to whom? Does this mean acceptable to CAA? HSE? Both? Or someone else? With the prospective GHOST subgroup and the recent HSE activity in Scotland, it would be prudent to wait for the outcome of the subgroup work before publishing this wording. This sentence would benefit from some examples of what is considered to be "certain operational circumstances and/or for emergency (aircraft) operational reasons". Also, anti-collision beacons are switched on manually; they are not coupled with the engines. It would be useful to include this information here.	Noted	This is on hold and subject to the conclusions of the GHOST Sub-Group looking at procedures associated with approaching aircraft with engines running.
107	Chapter 2, para 6.3.3	"*Under any other circumstances the airline must produce a safety case that includes a risk assessment that is acceptable to the aerodrome operator. Aircraft operators wishing to consider such operational procedures should seek the advice and guidance from the HSE.* " This section would benefit from an official statement from CAA and HSE on this very controversial topic. HSE reps in Scotland have issued notices to some companies and have stated in writing that the reintroduction of the procedure would lead to further notices being issued. There is no mention in this section of the CAA's opinion, requirements or role in in the assessment of risks associated with this procedure. It is understood that there is going to be a GHOST sub-group looking into this and the findings of this should be aligned in the published 642. Also, it is understood that there is an updated "open letter" to be issued by HSE after the 1 Feb 2011 letter. From the industry perspective all these conclusions need to be aligned.	Noted	This is on hold and subject to the conclusions of the GHOST Sub-Group looking at procedures associated with approaching aircraft with engines running.
108	Chapter 2, Section 6, para 6.3.3	Last two sentences should read as, "Under ***these*** circumstances the airline must produce a safety case that includes a risk assessment that is acceptable to the aerodrome operator ***and the ground service provider*** . Aircraft operators wishing to consider ***using*** such operational procedures ***as routine*** , should seek the advice and guidance from the HSE".	Accepted	The paragraph has been amended.
109	Chapter 2, para 6.3.3 (Brakes/Chocks)	Contradictory, states personnel should not approach aircraft until engines have spooled down. Then goes on to state this maybe acceptable in certain operational circumstances.	Noted	This is on hold and subject to the conclusions of the GHOST Sub-Group looking at procedures associated with approaching aircraft with engines running.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
110	Chapter 2, para 6.3.6 c)	The “non-standard taxiway routing” should not be included here with the statement “a follow me vehicle should lead the pilot.”	Not accepted	CAA considers it to be 'good practice' and it may be applicable under certain circumstances, such as non-standard taxiway routing.
111	Chapter 2, para 6.3.7	To state “APUs and GPUs should be strictly controlled” is too strong. They “may be controlled”.	Accepted	The paragraph has been amended.
112	Chapter 2, para 6.3.8b	“*Before the aircraft enters the stand, the drive wheels of an apron-drive airbridge must be positioned in the marked parking box provided …*” Suggest: Before the aircraft enters the stand, the drive wheels of an apron-drive airbridge must be positioned in the marked parking box or pre-position box provided …”	Accepted	The paragraph has been amended.
113	Chapter 2, para 6.3.8f	“*f) Only when the aircraft has stopped, the wheel chocks are in place, the engines have run down and the aircraft anti-collision beacon has been extinguished, can the airbridge be driven from its parking position and docked to the aircraft, or steps be positioned beside the aircraft*” The sequence of this sentence suggests that the chocks will be put in place before the engines have spooled down and anti-collision beacons are off. Suggest: “f) Only when the aircraft has stopped, the engines have run down and the aircraft anti-collision beacon has been extinguished, can the wheel chocks be put in place. The airbridge can then be driven from its parking position and docked to the aircraft, or steps be positioned beside the aircraft”	Accepted	The aircraft arrival sequence is subject to further discussion, via the GHOST Sub-Group which is looking at procedures associated with approaching aircraft with engines running. The guidance in CAP 642 is not the definitive, and other sources may also be referred to (e.g. IGOM).
114	Chapter 2, para 6.3.8 and 6.3.9	There are 2 subsections titled 6.3.8 and 6.3.9. The first of these paragraphs don’t belong here under the FEGP/APU title. The second para 6.3.8 also doesn’t belong under the FEGP/APU heading.	Accepted	The paragraph has been amended.
115	Chapter 2, para 6.3.9	“*this may be because the airbridge is unserviceable and passenger steps must be used,*” Suggest: “passenger steps may be used” not “must”	Accepted	The paragraph has been amended.
116	Chapter 2, Section 6, para 6.3.8 (top of page)	Paragraph begins with reference to the dispatcher/airbridge operator and then in the last sentence it refers to the team leader. Who is the team leader?	Accepted	The paragraph has been amended.
117	Chapter 2, Section 6.3.9	Change to ‘…exercised with engine(s) running for…’ . It is SOP to exercise the thrust levers before engine start during pre-flight checks	Accepted	The paragraph has been amended.
118	Chapter 2, Section 6, para 6.3.9 / 6.3.10 (page 35)	Consider moving back to after 6.2.2 (page 32)	Accepted	The paragraph has been moved.
119	Chapter 2, para 6.3.10a	“*a) Emergency Stop switches: One gated switch located in the airbridge cab and clearly marked. A second gated switch, working in parallel with the first, located in a prominent and easily reached position at the head-of-stand and conspicuously marked. A person should be positioned adjacent to each switch until the aircraft has successfully parked.*” This suggests that there should be at least 2 people in place. This is not practicable.	Accepted	The paragraph has been amended.
120	Chapter 2, para 6.4 - General	There is no mention of wing-walkers when pushing back aircraft?	Accepted	The paragraph has been amended.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
121	Chapter 2, para 6.4.2 f)	On departure – the second sentence: "*A check should also be made to confirm that the ground equipment is configured to meet any specific settings for the aircraft type* " – what does this refer to?	Accepted	The paragraph has been amended.
122	Chapter 2, para 6.4.3, page 36	a) Add – Aerodrome operators	Accepted	The paragraph has been amended.
123	Chapter 2, para 6.4.3, page 37	d) Add – all tug drivers should be trained and competent in aircraft push and tow operators	Accepted	The paragraph has been amended.
124	Chapter 2, para 6.4.3, page 37	g) Change wording to read as below:- Before the Aircraft Commander calls fro pushback, they must ensure that the tug driver is in the tug, ready to push. The tug driver must listen to the exchange between the aircraft crew and ATC so that the tug crew have a full understanding of the detail of the ATC approval. If the tug driver has not heard the pushback instruction they must not push the aircraft and the tug driver must contact ATC for pushback instruction.	Accepted	The paragraph has been amended.
125	Chapter 2, Section 6, para 6.4.3 pg 37	d) All tug drivers should be trained and competent to drive aircraft tugs in all weather conditions, except during certain low visibility conditions; Clarification required regarding except in low visibility conditions	Accepted	The paragraph has been amended.
126	Chapter 2, Section 6, para 6.4.3	Pushback procedures seem to have an implied expectancy that there are no single operator pushbacks permitted. This requires clarification.	Noted	It is not the purpose of this CAP to prescribe rules/procedures for the pushback operation. The IGOM is the principal place where the standard practice is described.
127	Chapter 2, Section 6, para 6.4.3 (b)	Change sentence to read.....*and all doors/hatches* ***and service panels*** *are closed.*	Accepted	The paragraph has been amended.
128	Chapter 2, para 6.4.3d	"*d) All tug drivers should be trained and competent to drive aircraft tugs in all weather conditions, except during certain low visibility conditions;* " Suggest: "d) All tug drivers should be trained and competent to drive aircraft tugs in all relevant weather conditions;"	Accepted	The paragraph has been amended.
129	Chapter 2, Section 6, para 6.4.3 (e)	Define 'Pushback Supervisor'. Is the supervisor in addition to the tractor driver and headset operator?	Accepted	The paragraph has been amended.
130	Chapter 2, para 6.4.3e	There is no need for certification – 'trained and competent' is sufficient.	Accepted	The paragraph has been amended.
131	Chapter 2, Section 6, para 6.4.3 (f)	As above, define the supervisor and role. If in addition to the headset operator indicates that both need to be in contact with the flight crew.	Accepted	The paragraph has been amended.
132	Chapter 2, Section 6.4.3 g)	Add: : 'To reduce the possibility of an unauthorised pushback and consequent risk of collision etc, tug drivers should monitor the R/T frequency on which the pilot is obtaining ATC pushback approval and be prepared to challenge the pilot if an error is perceived.' (Editorial note: this is now in operation at XXX and has been seen to be one of the factors in reducing unauthorised pushbacks. This concept is in fact stated on page 87 below in 642)	Accepted	The paragraph has been amended.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
133	Chapter 2, para 6.4.3g	"*g) In the case of a departing aircraft being pushed back from its stand, the pilot of the aircraft will obtain approval to push back from ATC and pass this information to the headset operator who will then communicate this to the tug driver.* " A recent revision of procedures at a major international airport introduced the requirement: '(Tug drivers have a responsibility to listen to ATC frequency when in the tug). The Ground Engineer will advise the flight crew that the ground crew are ready for flight crew to request pushback'. This additional safeguard allows for ground staff to challenge flight crew if a pushback is requested but ATC have not approved the procedure. Suggest this is included in CAP 642 as an example of good practice for avoiding pushback without clearance.	Accepted	See amendment to comment in row 113.
134	Chapter 2, para 6.4.3g	Suggest reference is made to unauthorised pushbacks and communication errors, therefore the tug driver should maintain a listening watch at all times.	Accepted	The paragraph has been amended.
135	Chapter 2, Section 6, para 6.4.5 pg 39	Section numbering out of sequence	Accepted	The CAP will be subject to review and renumbering prior to publication.
136	Chapter 2, para 6.4.5	What is Apron layout/stand density? Isn't the term "layout" adequate?	Accepted	The paragraph has been amended.
137	Chapter 2, para 6.4.7	Suggest delete "fumes" this is too subjective – there are no defined limits.	Accepted	The paragraph has been amended.
138	Chapter 2, para 6.5 Engine Hazards	Another contradictory statement re personnel not approaching the aircraft whilst engines are running and/or whilst the anti-collision beacons are illuminated. This statement goes on to state 'unless it is part of their job function and is necessary for the task in hand'	Noted	This is on hold and subject to the conclusions of the GHOST Sub-Group looking at procedures associated with approaching aircraft with engines running.
139	Chapter 2, para 6.5.1	"*6.5.1 The associated safety hazards caused by exhaust blast, vibration, fumes, turning propellers and rotors and the intake suction of jet engines are well recognised.* " Suggest using 'Jet Blast' rather than 'exhaust blast'. This is a more well-known term. Suggest adding 'Noise' to the list of engine hazards.	Accepted	The paragraph has been amended.
140	Chapter 2, para 6.5.3	"*The number of engines started before pushback commences should be the minimum to meet technical and passenger service needs.* " This contradicts 6.3.3 – what is CAA policy here?	Noted	The CAA considers that the sentence doesn't contradict. However, paragraph 6.3.3 will be held in abeyance and clarified during further review (via GHOST).
141	Chapter 2, para 6.5.3	"6.5.3 Vehicles and personnel should not pass behind running engines."	Noted	
142	Chapter 2, para 6.5.3	"*6.5.3 Vehicles and personnel should not pass behind running engines.* " Suggest: "6.5.3 Vehicles and personnel should not pass directly behind running engines and should pass at a safe distance, e.g. 3 x aircraft lengths behind a taxiing aircraft."	Accepted	The paragraph has been amended.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
143	Chapter 2, para 6.5.3	"*6.5.3... Staff should not approach aircraft whilst engines are running and/or whilst anti-collision beacons are illuminated unless it is part of their job function and is necessary for the task at hand, in which case a risk assessment of the procedure, leading to control measures and mitigations which protects aircraft safety and health and safety of ground personnel have been jointly agreed with all relevant stakeholders, and received approval of the Health and Safety Executive.*" What is meant by "necessary for the task at hand"? Please provide some examples of tasks for which it would be acceptable for staff to approach aircraft with engines running and/or whilst anti-collision beacons are illuminated. Please confirm that HSE will be issuing approvals for procedures suggested in this section.	Noted	This is on hold and subject to the conclusions of the GHOST Sub-Group looking at procedures associated with approaching aircraft with engines running.
144	Chapter 2, para 6.5.3 (example)	Certain ramp procedures are described as requiring HSE approval. We are not aware of a process that supports this or of a legal requirement to have workplace processes specifically approved in advance by the HSE.	Noted	This is on hold and subject to the conclusions of the GHOST Sub-Group looking at procedures associated with approaching aircraft with engines running.
145	Chapter 2, Section 6, para 6.5.3 pg 39	Is there a formal approvals process of approval from the Health and Safety Executive/	Noted	This will be subject to review following publication of HSG65 by the HSE.
146	Chapter 2 , para 6.5.3	HSE does not operate an approval process for Turnround activities. Dutyholders are required to conduct suitable and sufficient risk assessments for their employees and others, taking into account industry guidance and agreed procedures. All parties engaged in turnround activities should co-ordinate and co-operate to ensure that their risk assessments are suitable and sufficient.	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
147	Chapter 2, para 6.5.4	"*6.5.4 Drivers and pedestrians should be vigilant at all times on the apron. A common indication to ground staff that aircraft engines are running, or are about to be started, is the illumination of the aircraft's anti-collision beacon(s).*" Suggest that additional text be included to confirm that the anti-collision beacons should not be solely relied upon to indicate whether or not it is safe to approach an aircraft as they are not interlocked and may be illuminated or extinguished regardless of whether the engines are running or not.	Accepted	The paragraph has been amended.
148	Chapter 2, para 6.5.4, page 40	Reference should be made to other signs (in addition to aircraft anti-collision beacons)	Accepted	The paragraph has been amended
149	Chapter 2, para 6.5.7	Why do all engine runs need prior approval from ATC? They may take place on remote aprons or in facilities designed and located for engine runs, possibly in maintenance areas or leased areas. 6.5.7 What is the view of CAA on the list of points (a) to (i), which are prefaced with "for example"	Accepted	These are included as examples from aerodrome practices. The paragraph has been amended.
150	Chapter 2, Section 6, para 6.5.7 pg 40	f) The area behind and adjacent to the cone of the blast should be clear of equipment and the ground must be firm and without loose tarmac, stones or other material; The area around the engines in takes should also be clear or equipment and the ground must be firm and withou loose tarmac, stones or other material;	Accepted	The paragraph has been amended.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
151	Chapter 2, para 6.5.7i	"*…For this purpose and if the R/T or interphone link is unserviceable, hand signals by day and light signals by night may be used.* " Suggest the qualification of which hand signals are acceptable, e.g. ICAO approved hand signals.	Accepted	The paragraph has been amended.
152	Chapter 2, Section 6.5.7 i)	Remove 'and ATC' (Ed note: enabling the ground engineer to have the pilot interphone and ATC R/T in the same headset equipment is almost impossible to achieve)	Accepted	The paragraph has been amended.
153	Chapter 2, para 6.5.8	This appears to contain a contradiction – the first sentence refers to aerodrome operators and the last sentence refers to "airlines responsibility" Isn't this an employer's responsibility to make staff aware of risks?	Accepted	The paragraph has been amended.
154	Chapter 2, Section 6, para 6.5.9	Spelling mistake. 'o' should be 'of'	Accepted	The paragraph has been amended.
155	Chapter 2, para 6.5.9	"to" not "o"	Accepted	The paragraph has been amended.
156	Chapter 2, para 6.5.9	"*6.5.9 Aerodrome operators should provide suitable apron layouts and facilities that provide compliant clearances for the operation of propeller aircraft types* " Suggest the inclusion of the regulatory requirements for which compliance is suggested here, e.g. ICAO annex 14, CAP 168?	Partially accepted	Aerodrome users that need to know the regulatory requirements should be made aware of them. However, the text has been amended.
157	Chapter 2, Section 6, para 6.5.9 pg 41	Letter f missing third line	Accepted	The paragraph has been amended.
158	Chapter 2, Section 6.5.9	Change 'o' to 'of'	Accepted	The paragraph has been amended.
159	Chapter 2, para 6.5.10	This contains a contradiction "Passengers must not be permitted" followed by "Where it is operationally essential…"	Noted	There are circumstances where such procedures may be required.
160	Chapter 2, para 6.5.11a	"draught" Should be 'draft'.	Accepted	The paragraph has been amended.
161	Chapter 2, para 6.5.12	"*a) There are 2 types of helicopter arrivals – those with skids that hover-taxi to their parking spot, and those with wheels that land and then taxi on the ground.* " If there are markings, signage and ATC procedures, helicopters can hover-taxi to their parking spot. It is not necessary to say "procedures…should include arrangements …whereby helicopter arrivals are marshalled".	Noted	
162	Chapter 2, para 6.5.12a	"*a) Helicopter arrivals are marshalled, unless the helicopter apron is remote and configured for self-manoeuvring. Marshalling assistance/* ***safeguarding*** *may also be required for departure;* " In Aerodrome Operator documentation 'Safeguarding' has 2 very specific meanings, e.g. Aerodrome Safeguarding (planning processes) and weather safeguarding (related to low visibility procedures). Suggest this section is amended to "Marshalling assistance may also be required for departure;"	Accepted	The paragraph has been amended.
163	Chapter 2, para 6.5.13 a) and b)	This is too subjective re "fumes". (Is there any guidance?)	Noted	Engine manufacturers have the authoritative guidance. However, the paragraph has been amended.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
164	Chapter 2, Section 6, para 6.5.14	No, managers of aircraft handling staff are not responsible to calculate the ingestion zones in front of running engines. This information shall be calculated by the engine manufacturer, and passed to the ground handling company by the airline. The handling company shall then disseminate the information to the staff via training.	Accepted	The paragraph has been amended.
165	Chapter 2, Section 6.5.16	Needs apostrophe ‘ at start	Accepted	The paragraph has been amended.
166	Chapter 2, Section 6, para 6.5.16 pg 42	Suction – Ingestion add diagram from previous version of CAP 642.	Accepted	Ingestion diagrams will be reinstated.
167	Chapter 2, para 6.5.16	“***Foreign Object Damage***” This should be entitled ‘Foreign Object Debris/Damage’.	Accepted	The paragraph has been amended.
168	Chapter 2, para 6.5.16	Suggest: add at the end “in the vicinity of moving aircraft” “All” is too strong a description.	Accepted	The paragraph has been amended.
169	Chapter 2, para 6.5.19	“*6.5.19 The presence of FOD is due mainly to the carelessness of staff and their lack of understanding of the consequences.*” This sentence is inaccurate, incorrect and unnecessary and should be removed.	Partially accepted	FOD may be caused by personnel; however, the text has been amended.
170	Chapter 2, para 6.5.19	“*An item of FOD seen in an area that a staff member is not authorised to enter or which they are unable to remove for any reason should be brought to the attention of their supervisor and the* ***duty manager airside operations****.*” Suggest this title is amended to “Airside Operations” or “The Aerodrome operator”.	Accepted	The paragraph has been amended.
171	Chapter 2 para 6.5.23	“*6.5.23 Generally, airport operators should have in place agreed policies and arrangements for the removal of hazards from the apron such as abandoned vehicles and equipment.”* Remove “Generally”. Suggest the addition of a note: A charge is normally made by the Aerodrome Operator for this.	Accepted	The paragraph has been amended.
172	Chapter 2, para 6.6.1	Replace “a run of” – with “adjacent”	Accepted	The paragraph has been amended.
173	Chapter 2, para 6.6.2	“*There must be suitable and effective measures to prevent any person falling a distance likely to cause personal injury.*” What is the HSE guidance regarding a distance below which personal injury is not likely to happen? We think that personal injury can occur from a fall at any height (distance).	Noted	This will be subject to review following publication of HSG65 by the HSE.
174	Chapter 2, para 6.6.3	Replace “*principal safety threats*” with “hazard”? (a) is not a threat – it is a circumstance – is the hazard being highlighted here the risk of collision or jet blast? Suggest re-write.	Accepted	The paragraph has been amended.
175	Chapter 2, 6 – Multiple pushback procedures, para 6.6.4	“*the safe separation distance behind an aircraft must be determined by conducting collaborative a risk assessment involving all interested parties, including the air navigation service provider, which should make reference to aircraft engine manufacturer’s specific guidance.*” This is not the usual methodology used at UK airports. The Aerodrome Operator will issue guidance regarding safe distances based upon manufacturer’s guidance but there is seldom a collaborative risk assessment and the ANSP is also seldom involved.	Accepted	The paragraph has been amended.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
176	Chapter 2, para 6.6.4	"*By its very nature all access equipment has to be used in close proximity to the aircraft. Drivers may need to seek assistance, especially from a person appointed to guide the vehicle, to ensure the correct positioning of the access equipment so that there are no gaps large enough for a person to fall through, as well as preventing the access platform or its chassis striking the aircraft. Drivers should also make allowance for the change in height of an aircraft during loading/unloading as this might cause the aircraft to touch the access equipment resulting in damage to the aircraft.* " Suggest: "Access equipment is **usually** used in close proximity to the aircraft. Drivers **should** seek assistance, from **a trained banks** person to guide the vehicle, to ensure the correct positioning of the access equipment so that there are no gaps large enough for a person to fall through, as well as preventing the access platform or its chassis striking the aircraft. Drivers should also make allowance for the change in height of an aircraft during loading/unloading as this **may lead to aircraft damage.**	Accepted	The paragraph has been amended.
177	Chapter 2, para 6.6.4	Remove "fumes" just discuss "jet blast". 6.6.4 Last sentence – we believe this information is in the Airport Planning Manuals, not maintenance.	Accepted	The paragraph has been amended.
178	Chapter 2, para 6.6.5	Delete "roofs of buildings" – this is not specific to airside and is covered by HSE regs that apply.	Noted	The content applicable to HSE regulation is subject to further review in light of the HSE's forthcoming revision to HSG65.
179	Chapter 2, para 6.6.7	"*Work at* ***heights above??*** *should only be undertaken from equipment fitted with guardrails to all sides in order to comply with relevant HSE guidance or requirements.* " There needs to be a threshold height included here.	Not accepted	Health and safety requirements are in place and do not, in this case, need to be duplicated here.
180	Chapter 2, Section 6, para 6.6.9	Remove the reference to 'two-metres', it is obsolete. A fall from height as defined by the HSE is <u>any</u> height above ground.	Accepted	The paragraph has been amended.
181	Chapter 2, Section 6, para 6.6.11	'...damage to door sills...", should this read "...damage to door seals..."?	Not accepted	The term "sill" is correctly used in this context, referring to inner door fixing around the frame or seal.
182	Chapter 2, Section 6, para 6.6.11 pg 45	Access to Aircraft Doors add images from pervious version of CAP 642	Accepted	These diagrams and those showing jet-blast and aircraft ingestion areas shall be reinstated.
183	Chapter 2, Section 6, para 6.6.11 pg 45	Number 6.6.12 missing	Accepted	The paragraph has been amended.
184	Chapter 2, para 6.6.19	The practice of leaving aircraft doors open without safety equipment, such as steps, in place should not be permitted. This would be an example of industry best practice and would address a current safety issue raised at GHOST recently. A reference to "specifically designed nets" in the third sentence would be beneficial as their use should be promoted as this is the safest method of dealing with this issue.	Partially accepted	The text has been amended. Aircraft Operator safety requirements are set out in CAP 789.
185	Chapter 2, para 6.7	Title of this section should be 'Airside Incidents'.	Accepted	The paragraph has been amended.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
186	Chapter 2, para 6.7.2	"*These incidents have commonly been caused either by incorrect installation or inadequate maintenance of the equipment, or poor procedures leading to operator error.*" This sentence is unsubstantiated and unnecessary.	Accepted	The sentence has been deleted and re-phrased.
187	Chapter 2, para 6.7.3	Title of this section should be "Airbridge Installation"	Accepted	The paragraph has been amended.
188	Chapter 2, para 6.7.3	"*6.7.3 The efficient and safe in-service operation of these* ***walkways*** *depends on their correct installation. Therefore, they should be inspected after installation and before being put into service for the first time.*" Suggest: "6.7.3 The efficient and safe in-service operation of these **Airbridges** depends on their correct installation. Therefore, they should be inspected after installation and before being put into service for the first time."	Partially accepted	Correct operation is the result of correct installation and continuing maintenance.
189	Chapter 2, para 6.7.4	"*6.7.4 Detailed advice cannot be given on the content of such an inspection, but it is unlikely to be adequate unless it is based on the findings of a risk assessment. Such an assessment will need to cover the appropriate issues outlined in paragraph 9.12.*" Suggest: "6.7.4 **Inspections should be** based on the findings of a risk assessment. Such an assessment will need to cover the appropriate issues outlined in paragraph **6.7.12**"	Partially accepted	The paragraph has been amended.
190	Chapter 2, para 6.7.6, page 47	Item c) re-word safety hoops – "pressure sensitive safety system." Consider adding – Best practice is to only allow the operator to be on the airbridge while it is moving. Consider adding – SEG Emergency Stop installed in airbridge cab Consider adding – means of preventing unauthorised use of airbridge	Accepted	The paragraph has been amended.
191	Chapter 2, para 6.7.7	Title of this section should be "Markings" to include 6.7.10 which is not about "Ground" markings.	Accepted	The paragraph has been amended.
192	Chapter 2, para 6.7.7	"***Ground Markings*** *6.7.7 Apron-drive airbridges are vulnerable to obstructions. Significant damage has occurred when items of equipment have been parked in the operating area of airbridges. For stands equipped with an apron-drive airbridge, ground marking in the form of a hatched area* ***and/or 'starburst'*** *should be provided to delineate the area within which the parking of vehicles and equipment must be prohibited.*" Delete "*Apron drive airbridges are vulnerable to obstructions*" and add "The airbridge operator should check the area is clear before moving the airbridge". Suggest the inclusion of '**and/or starburst'.**	Accepted	The paragraph has been amended.
193	Chapter 2, para 6.7.12	"*Such inspection and maintenance regimes are unlikely to be adequate unless they consider the following points:*" Suggest: "Such inspection and maintenance regimes **should** consider the following points:"	Accepted	The paragraph has been amended.
194	Chapter 2, 6.7.13	Delete "immediate"	Accepted	The paragraph has been amended.
195	Chapter 2, para 6.7.20 to 23	Do not belong under "Operator Training and Licensing" – these are not to do with training or licensing.	Accepted	The paragraph has been amended.
196	Chapter 2, Section 6, para 6.7.20 pg 49	Does unattended mean on the bridge head or in the vicinity of the bridge controls? Could the shoe device be used as in 6.7.21	Accepted	The paragraph has been amended to provide clarity

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
197	Chapter 2, Section 6, para 6.7.21	More clarity required. If there is a 20-30min gap between offload and onload (airbridge not being used), is this saying that the airbridge must be retracted and parked between the offload and onload? Define 'In attendance'. Does this mean someone at the controls, or nearby? And A 'safety shoe' is not the only safety device used on airbridges but this reference seems to indicate that it is the only acceptable type.	Accepted	The IGOM provides relevant more detailed guidance.
198	Chapter 2, para 6.7.21	The first sentence does not allow for the airbridge being connected during a long turnrounds process after off-loading and before boarding. Caterers, cleaners and other staff use the airbridge to access the aircraft interior. Also: "Airlines and handlers are advised that whenever a bridge is docked to an aircraft a qualified airbridge operator should be in attendance, unless an approved and serviceable **safety shoe device** is employed." Can this device be more clearly identified, perhaps with use of the correct technical terminology?	Accepted	The paragraph has been amended.
199	Chapter 2, para 6.7.23, page 49	Consider adding – Best practice is to only allow the operator to be on the airbridge while it is moving.	Accepted	The paragraph has been amended.
200	Chapter 2, para 6.8.1	"*The provision of assistance for incapacitated or disabled passengers will require particular thought.*" Terminology such as 'passengers with reduced mobility (PRM)' is now commonly used and the document should be consistent in its use of such terms.	Accepted	The paragraph has been amended.
201	Chapter 2 , para 6.8.3	Final bullet – In health and safety legislation there is no requirement to identify the centre of gravity. If a load is significantly skewed in it's weight distribution then the heavy side/end should be identified. It may be that in certain cases the best way of doing this would be by identifying the centre of gravity.	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
202	Chapter 2, Section 6, para 6.8.4	Bullet point 5 – need to include.....'the distance(s) the bags need to be carried shall be kept to a minimum'.	Accepted	The paragraph has been amended.
203	Chapter 2, para 6.8.4	This list is just a list of "suggestions"? Bullet point: "Use conveyors (or similar) that are of a suitable height to minimise the risk of injury from lifting or **lowering** items to or from such equipment. 650 mm above the floor is commonly found to be an acceptable height,…"Spelling – lowing corrected to lowering.	Accepted	The text has been corrected.
204	Chapter 2, Section 6, para 6.8.4	Very generic H&S wording. 'Floors should be dry and adequately maintained'. Most Airside work outside.	Accepted	The paragraph has been amended.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
205	Chapter 2 , para 6.8.4	HSE is currently revising [2]operational guidance on the risks associated with baggage handling on the ramp and this is due to be published in the Autumn 2012. There is currently a debate on the acceptable height ranges for lifting or lowering items on conveyor belts. Therefore recommend removing reference to '650mm above the floor' as it may cause confusion within industry when HSE's guidance is published. Suggest amending to ' conveyor heights should be set to minimise the need for operators to stoop/bend, or support loads above elbow height when lifting or placing bags….' and refer to impending HSE guidance	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
206	Chapter 2, para 6.8.5	Agree with the message to review each state of the process, but the aim, as well as looking for opportunities to 'eliminate' stages, should be to make improvements wherever possible. Radical improvements are unlikely without fundamental changes to the overall processes, so marginal gains made across existing processes can be beneficial. The example given seems to suggest a Mallaghan LBT90 type device - but manual handling is still required between the vehicle and the hold, as well as having some other potential issues. An extendable belt loader might be a more widely applicable solution. The section does not mention manual handling of aircraft steps or dollies etc other than very briefly in the 1st paragraph. The section focuses on baggage handling risks and other manual handling related risks seem to be lost.	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
207	Chapter 2, para 6.8.5	Is a repeat of the 2nd bullet of 6.8.4.	Accepted	The paragraph has been amended.
208	Chapter 2, Section 6, para 6.9.5	Seems too prescriptive and wordy – more general statement on a collaborative noise action plan would suffice.	Accepted	The paragraph has been amended.
209	Chapter 2, para 6.9.6	"*6.9.6 Where communication between personnel is essential or audible alarms are used to assure safety,* ***a thorough risk, health and safety assessment*** *of the environment must be carried out*" Suggest revise to: "… a thorough risk assessment…"	Accepted	The paragraph has been amended.
210	Chapter 2 , para 6.10.4	Provide link to Approved Code of Practice for The Provision and Use of Work Equipment Regulations 1998: http://www.hse.gov.uk/pubns/priced/l22.pdf	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
211	Chapter 2 , para 6.10.5	To ensure consistency of terminology – consider changing 'companies' to 'dutyholders'	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
212	Chapter 2, para 6.10.5c	"*c) Equipment is inspected in certain circumstances to ensure that it is, and continues to be, safe for use.*" Suggest: "c) Equipment is inspected to ensure that it is safe for use."	Accepted	The paragraph has been amended.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
213	Chapter 2, para 6.10.6	See above	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
214	Chapter 2, Section 6, para 6.10.7	Consider moving this to before 10.6.6.	Not accepted	CAA does not consider it appropriate to move the sentence.
215	Chapter 2, para 6.10.8 and 6.10.12	To ensure consistency of terminology – consider changing 'stakeholders' to 'dutyholders'	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
216	Chapter 2, para 6.10.13	You might add "entrapment" – people can get trapped in lifting equipment.	Accepted	The paragraph has been amended.
217	Chapter 2, para 6.10.16, page 54	Add – "Aircraft" De-icers with a boom assembly	Accepted	The paragraph has been amended.
218	Chapter 2, Section 6, para 6.10.17	This section on non-lifting equipment seems irrelevant.	Accepted	The paragraph has been amended.
219	Chapter 2, para 6.10.20 f)	Agreed human factors are important, but does it matter which drives which?	Noted	
220	Chapter 2 , para 6.11.3	Remove reference to COSHH 1999 – this should read COSHH 2002	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
221	Chapter 2, para 6.11.5 (example)	In some cases, the procedures & requirements detailed in this chapter fall below current XX (and IGOM) standards (such as 6.11.5 - PPE 'might be useful' for toilet servicing - We insist on full body protection including a face visor).	Accepted	The paragraph has been amended.
222	Chapter 2, para 6.11.12	"*Control of the risks of flammable substances can be considered in terms of removing at least one side of the 'Fire Triangle'.*" The Fire Triangle should be explained here. For those who already know what it is, it will be a useful reminder. For those who do not know, it should be explained.	Not accepted	This information can be found in non-CAA guidance.
223	Chapter 2, para 6.11.14 and 6. 11.15	These sections ought to refer to CAP 748 and DSEAR (Dangerous Substances and Explosive Atmospheres Regulations).	Accepted	The paragraph has been amended.
224	Chapter 2, para 6.11.14, page 57	Add - reference to CAP 748 and JIG document.	Accepted	The paragraph has been amended.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
225	Chapter 2 , para 6.11.15	The Highly Flammable Liquids and Liquefied Petroleum Gases Regulations 1972 have been replaced by The Dangerous Substances and Explosive Atmospheres Regulations 2002.	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
226	Chapter 2, para 6.11.15, page 57	Add - DESEAR	Accepted	The paragraph has been amended.
227	Chapter 2, para 6.12.1	"6.12.2 Details of workplace lighting requirements under health and safety law are contained in HSG38 from the HSE." This document does not refer specifically to airport or airside areas. The most similar environments are listed in the table below. These average illuminance levels are not in accordance with CAP 168 requirements and if the area is regarded as 'hazardous' then the 50 lux average lux level is misleading and unlikely to be achieved on the apron. Suggest that reference to this document is removed. Reference to CAP 168 should be made and a copy of the illuminance measurement technique should be included here.	Noted	This will be subject to further review following publication of HSG65 by the HSE.
228	Chapter 2, para 6.12.1 9 (see above)	Comment concerning apron floodlighting/task lighting requirements and the minimum and average measured illuminance (lux).	Noted	This will be subject to further review following publication of HSG65 by the HSE. However, the CAA has no immediate plans to amend the guidance provided in CAP 168, Chapter 6, paras 7.12 and 7.13.
229	Chapter 2, para 6.12.2	Provide link to HSE guidance HSG38 - http://www.hse.gov.uk/pubns/priced/hsg38.pdf	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
230	Chapter 2, para 6.12.4	Replace "introduce" with …"have" arrangements'.	Accepted	The paragraph has been amended.
231	Chapter 2, Section 6, para 6.13	One of the most dangerous weather conditions at an airport is thunderstorm and in particular lightning, so am very surprised that there is no mention of it here. Aerodrome operators MUST include the three-phase storm warning procedure in the aerodrome manual and the procedure must detail how it will be communicated to the airport community during a storm.	Accepted	A new paragraph has been added.
232	Chapter 2, Section 6, para 6.13.1	High temperature and / or humidity should also be considered amongst adverse weather as it can not only have a detrimental effect on human performance but also on aircraft performance where in extreme temperatures take off weights may be regulated down.	Accepted	New text has been included
233	Chapter 2, para 6.13.1	"*6.13.1 Besides snow and ice, other adverse weather conditions affect the safety of aircraft operations on aprons, principally strong surface winds and low visibility conditions.* " Suggest the inclusion of '**Thunderstorms and Lightning'** in this section.	Accepted	The paragraph has been amended.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
234	Chapter 2, Section 6, para 6.13.2	Aircraft manufacturers lay down limits for aircraft doors to be operated in – this can be an operational limiting factor at an airport as such this information should be included and available to all at the airport. There have been times where a GHA has been actively encouraged to open doors (cargo and service) where manufacturers limits are exceeded. Undue pressure.	Accepted	The paragraph has been amended
235	Chapter 2, Section 6, para 6.13.6, page 59	Typo.....manger should say manager	Accepted	The spelling has been corrected.
236	Chapter 2, para 6.13.11	Suggest: delete “continue to” and “severe”.	Accepted	The paragraph has been amended.
237	Chapter 2, para 6.13.13	Replace “that they, airlines and handling agents have…” with “that there are…”	Accepted	The paragraph has been amended.
238	Chapter 2, Section 6, para 6.13.13	The ‘Note’ section would benefit from more elaboration on the particulars of product guidance	Not accepted	Advice on (Anti-De-) icing fluids is found elsewhere and is considered an aircraft operator issue.
239	Chapter 2, para 6.13.13 NOTE	“***NOTE** : Only anti-icing and de-icing agents specifically approved for use on aircraft or airside areas should be used.* ” Approved by whom?	Partially accepted	The paragraph has been amended.
240	Chapter 2, para 6.13.16b	“*When driving, bear in mind that vehicles require a greater distance in which to stop safely;* ” Suggest: “When driving, bear in mind that vehicles **may** require a greater distance in which to stop safely;”	Accepted	The paragraph has been amended.
241	Chapter 2, para 6.13.16d	“*d) Ensure attention is given to vehicle inspection prior to use. Check the operation of lights, battery condition and that sufficient anti-freeze is used in coolants and other fluids;* ” Suggest: “d) Ensure attention is given to vehicle **daily** inspection prior to use. Check the operation of lights, **brakes, tyres,** battery condition and that sufficient anti-freeze is used in coolants and other fluids;” Add ‘Windscreen wipers’ to the list.	Accepted	The paragraph has been amended.
242	Chapter 2, para 6.13.16e	Suggest: add “can” to read “…materials initially can become more slippery”.	Accepted	The paragraph has been amended.
243	Chapter 2, para 6.13.8	“*In most airfield layouts, aprons border directly on to the taxiway system.* ” aprons must all border on the taxiway or aircraft won’t be able to get to/from there.	Accepted	The paragraph has been amended.
244	Chapter 2, para 6.13.9	Replace “it must be ensured that staff are aware” with “staff must be aware”.	Accepted	The paragraph has been amended.
245	Chapter 2, para 6.14.1	“*Regulations 12 and 13 of the Workplace Regulations are the relevant legislation.* ” These regulations should be repeated in detail in this document.	Noted	This will be subject to further review following publication of HSG65 by the HSE.
246	Chapter 2, para 6.14.2 and 6.14.3	These sub-sections are poorly written and would benefit from a re-write.	Accepted	The paragraph has been amended.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
247	Chapter 2, para 6.14.4	"*6.14.4 Poor maintenance of surfaces can also contribute to the risk of slips and trips. Damage such as potholes and excessive wear increase the risk that slips will occur, as well as also being a potential source of FOD. Aerodrome maintenance programmes should be developed by the aerodrome operator to discover areas in need of attention before they become a source of danger. Airlines and ground handlers should assist, for example by reporting parts of the apron which have been damaged, or are becoming excessively worn.*" Suggest: "6.14.4 Poor maintenance of surfaces can also contribute to the **likelihood** of slips and trips. Damage such as potholes and excessive wear increase the **likelihood** that slips will occur, as well as also being a potential source of FOD. Aerodrome maintenance programmes should be developed by the aerodrome operator to **identify** areas in need of attention before they become a **hazard**. **All airside users** should assist by reporting **areas** which have been damaged, or are becoming excessively worn."	Accepted	The paragraph has been amended.
248	Chapter 2, para 6.15.4, page 62	Add – Use of Fixed Electrical Ground Power (FEGP) equipment	Accepted	The paragraph has been amended.
249	Chapter 2, Section 6, para 6.15.4	The use of FEGP 'By-Pass' function is an absolute requirement for 787 operations where no internal bus power is energised. The paragraph requires rewording to accommodate this requirement.	Accepted	The paragraph has been amended.
250	Chapter 2, para 6.15.5	"*All maintenance of electrical systems should be carried out by competent people to an adequate standard.*" Suggest: "All maintenance of electrical systems should be carried out by competent people to **the required/approved** standard."	Accepted	The paragraph has been amended.
251	Chapter 2, para 6.16.1	What are the "main installation sites" referred to, and why is this necessary?	Accepted	Amended to remove this phrase.
252	Chapter 2, para 6.16.2	"*6.16.2 For staff of airlines or operators, simple 'one shot' fault reporting is best. Faults on vital operational equipment, or facilities, that could affect aircraft safety, such as airbridges and VDGS, should be reported to a single agency. By this means the appropriate and immediate safety decisions can be taken and at the same time a prompt engineering response can be initiated.*" Suggest re-write: "6.16.2 **All airside users should report** faults on vital operational equipment, or facilities, that could affect aircraft safety, such as airbridges and VDGS **immediately**, **preferably** to a single **point**. **This will allow** the appropriate and immediate safety decisions can be taken and a prompt **remedial** response can be initiated."	Accepted	The paragraph has been amended.
253	Chapter 2, para 6.16.4	"*6.16.4 For faults where a hazard to aircraft existed or was thought possible, consideration should be given to filing an MOR. Further details can be found in CAP 382 'The Mandatory Occurrence Reporting Scheme'.*" Suggest: "6.16.4 For faults where a hazard to aircraft existed or was **potentially** possible, an MOR **should be filed**. Further details can be found in CAP 382 'The Mandatory Occurrence Reporting Scheme'."	Accepted	The paragraph has been amended.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
254	Chapter 2, Section 6, para 6.16.6	Reports submitted under RIDDOR or via company reporting procedures should be made via the HSE website http://www.hse.gov.uk/riddor/	Noted	
255	Chapter 2, Section 6, para 6.16.6	Northern Ireland does not submit RIDDOR documents to this website.	Accepted	The paragraph has been amended and links to the relevant legislation provided.
256	Chapter 2, Section 6, para 3.8.9 - 3.8.10	Duplication of paragraph numbering in column	Accepted	The paragraph has been amended.
257	Chapter 2, Section 6, top of page 5	This should be a new section is our opinions (suggestion 'Airbridges and VDGS') to end at the end of 6.4.2	Noted	The paragraph has been amended.
258	Chapter 2, Appendix 2A, 5b	There are not "accountable safety managers" within all organisations operating airside – CAA does not require Handling Agents or Service Providers to have an accountable manager or a safety manager.	Accepted	The paragraph has been amended.
259	Chapter 2, Appendix 2A Airside/Apron Safety Committee 6 The Committee's Terms of Reference	Should this include bird control reports	Not accepted	Birdstrike reports can be included, it's a local decision. The CAA does not prescribe what can or cannot be discussed at an ASC.
260	Chapter 2, Appendix 2A, 6x	"*x) Environmental safety matters such as noise, blast and fumes;"* Suggest: "x) Environmental safety matters such as noise, blast and **emissions**;"	Accepted	The paragraph has been amended.
261	Chapter 2, Appendix 2A, NOTE	Suggest: replace "must not substitute" with "should form part of"	Accepted	The paragraph has been amended.
262	Chapter 3	This chapter appears to be far to detailed to be included in this CAP. If would be far better suited as a guidance annexe to CAP791. The chapter should reflect the key points of apron layout without specific dimensions. This chapter would be excellent guidance for the planning of a new airport or apron.	Not accepted	The CAA considers that the guidance is correctly included in this CAP.
263	Chapter 3	For the detail contained within this chapter schematics should be included to make the information provided more user friendly.	Not accepted	Diagrams can be found in ICAO Annex 14, CAP 168 and CAP 637.
264	Chapter 3	No constructive feed back to CAA. All great idea's/suggestions if constructing a new apron & have a big pot of money and plenty of room.	Noted	
265	Chapter 3	Having had recent experience with an island airport redesigning its apron and stands, this guidance in addition to CAP 168, will be beneficial to operators.	Noted	

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
266	Chapter 3, GENERAL	This whole section is incongruous in a chapter entitled 'Apron and Stand Design' (NEW). There is a preponderance of subjective and irrelevant statements of regularly occurring activities throughout the section. These are unnecessary. Suggest this section is re-written with a clear focus on minimum design requirements and the removal of the various activity references. Examples of unnecessary 'activity' content which is not relevant to a chapter on Apron and Stand Design: "*10.5 At some airports it may be the responsibility of the Turnround Coordinator, or other such person with responsibility for the aircraft turnround, to ensure all equipment used in the turnround process is returned to its allocated space when the process is completed." "13.2.2 Aircraft Anti-Icing/De-Icing - When the weather conditions, particularly the temperature, fall below certain limits, the airlines or their handling agents may spray the aircraft with anti/de-icing chemicals using specialist vehicles in order to prevent or remove snow/ice." "13.2.3 Experiments in the past to route FEGP along the airbridge have not been entirely successful, with problems created when the airbridge is unserviceable, and aircraft damaged when the airbridge has been backed off before the power cable was disconnected." "13.2.4 Aircraft Maintenance - Routine minor maintenance is carried out during the aircraft turnround on stands. However, on occasion, minor repair work may be carried out involving the use of engineering platforms, etc. For major repair work, the aircraft would normally be towed to the maintenance area or a remote stand." "13.2.6 Aircrew Handling - At some airports aircrew are taken to and from the aircraft by coach; sometimes separate coaches for flight deck crew and cabin crew."* In addition, sections 13.2.9, 13.2.10, 13.2.11, 13.2.12 and 13.2.13 do not refer to the design of aprons or stands.	Noted	Chapter 3 is subject to further review and will incorporate the requirements of the impending EASA Aerodrome Rules (Certification Specifications) where applicable.
267	Chapter 3 – General Note	General consensus of opinion is that this whole section should be omitted from CAP642 and incorporated in to a CAP 168 revision.	Not accepted	The CAA notes the suggestion but believes that there is greater relevance in placing it within this CAP, with its emphasis on apron safety.
268	Chapter 3, Apron and Stand Design (NEW)	Whilst this is a very informative and useful chapter, it would be further enhanced by the inclusion of example coloured layout drawings showing different examples of stands with the various components of a stand design.	Noted	~~The CAA does not hold the source files for depiction of such diagrams, and does not hold the in-house publishing capability to produce them.~~ A typical stand layout illustration shall be included. In the meantime, diagrams can be found in other documents such as CAP 637 (Visual Aids Handbook), ICAO Aerodrome Design Manual (Part 4 Visual Aids) and ACI Apron Markings and Signs Handbook.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
269	Chapter 3 Apron and Stand Design (NEW)	We suggest that the UK (CAA?) should consider adopting the 'Equipment Restraint Area' (ERA) concept & stand markings. This provides a clear definition of the safety zone around a parked aircraft. Some sections of the IATA IGOM are written around this concept and for UK operations we'll have to use an equivalent such as 'within 5 meters of the aircraft' etc which is difficult to apply & enforce.	Noted	The CAA accepts that other industry guidance may be used, that may depict or advocate use of ERA.
270	Chapter 3 Apron And Stand Design (NEW) 2 Physical Characteristics, 3 Stand Sizes and Clearances, 4 Stand Length, 5 Stand Width	These proposals will have severe implications for most UK airports both operational and financial regarding redesigning stands for compliance. Over all these proposals are excessive and unnecessary. This airport has been operating with lesser clearances successfully for the past 5 years without incident.	Noted	Chapter 3 will be reviewed in order to reflect the Certification Specifications set out in the impending EASA Aerodrome Rules.
271	Chapter 3, Introduction 1.1	Refers to CAP 168 compliance but should really include EASA / ICAO Annex 14 as this is where we are heading, certainly for those airports which will have defined stands	Noted	CAP 168 is currently the primary UK compliance regulation. This amendment to CAP 642 will be future proofed to EASA Aerodrome Regulations.
272	Chapter 3, para 1.1	How can "guidance" "ensure compliance" with "minimum standards"? This doesn't make sense. Suggest: replace "dynamic" with "flexible"	Noted	The text has been amended to provide clarification.
273	Chapter 3, para 1.3	Clarify what information has been previously provided on this paragraph.	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
274	Chapter 3, para 1.3	"1.3 The HSE has highlighted some of the hazards that may occur on apron areas, and therefore it is important to provide stands and aprons that are designed to reduce the hazards where possible and to facilitate aircraft turnrounds and other activities as safely as possible." Where is this HSE documentation/finding highlighted?	Noted	This will be subject to HSE review following the publication of HSG65.
275	Chapter 3, Section 1, para 1.4	On the 6th line down – change ***reply*** to ***rely*** .	Accepted	The paragraph has been amended..
276	Chapter 3, para 1.4	"The business models of many airlines **reply** on short aircraft turnround times;" Should be '**rely**' not 'reply'	Accepted	The paragraph has been amended.
277	Chapter 3, para 1.4	The second sentence – should be the other way round – airlines and ground handling organisations should take into account the airside infrastructure when agreeing delivery targets and service level agreements"	Accepted	The paragraph has been amended.
278	Chapter 3. para 1.5	No need to mention "blended wings" – better to wait until they are certified.	Noted	
279	Chapter 3, para 3.1	'Stand sizes and clearances' does not mention 'drive through' stands.	Noted	The text is intended to address the main stand types.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
280	Chapter 3, Section 3, para 3.2	First sentence may be better worded as, "The clearance between a moving aircraft on a stand and any obstruction should be a minimum of 20% of the wingspan of the ***largest aircraft expected to use the stand*** .	Accepted	Noted. The text has been amended to reflect CAP 168.
281	Chapter 3, Section 3, para 3.2	Clearance reduced to 4.5m is applicable to 'a suitably managed guidance system' should this not also include marshalling as well as VGDS? The 4.5 metre clearance is not in keeping with the ICAO figure of 7.5m for code D, E, F. EASA has other figures which allow for airbridges and for wings to pass over certain objects.	Accepted	The paragraph has been amended.
282	Chapter 3, para 4.1, page 67	Should this read "minimum of 12 metres". Longest aircraft plus 12m, split so that there is 7.5m ahead of the aircraft and 4.5m behind the tail, if there is a Head of Stand road. If there is only a Tail of Stand road, then the 12m will be split so that there is 11m ahead of the aircraft and 1m clearance at the tail. If there are both Head of Stand and Tail of Stand roads, then the stand can be shortened by 3.5m, with 7.5m ahead of the aircraft and 1m at the tail.	Accepted	Chapter 3 is subject to further review and will incorporate the requirements of the impending EASA Aerodrome Rules (Certification Standards).
283	Chapter 3, Section 4.1	The stated minimum differs from ICAO SARPS and the forthcoming Commission Implementation Rules (NPA 2011 20) on Aerodromes, therefore should the increase in minimum distances not be risk based i.e. a recommended minimum distance of XXm for code X aircraft from the nose of the aircraft (subject to assessment) to a …..etc	Noted	The text has been revised to reflect the purpose of the distance required.
284	Chapter 3, Section 4, para 4.1.a and 4.5	HOS Road – Contradicts each other.	Not accepted	The paragraphs do not contradict each other.
285	Chapter 3, Section 4.2	Likewise this has to be risk based taking into account VDGS, frequency of "max design" operations etc. A minimum recommendation of 2m up to 4m would be more appropriate.	Noted	The flexibility to enable circumstances where reduced distances are required at the rear of stands is provided in 4.3.
286	Chapter 3, Section 4, para 4.2.a	2 metres has always been sufficient and historically proven to be suitable.	Not accepted	2 metres may not be sufficient to enable vehicles to circulate round the back of aircraft.
287	Chapter 3, Section 4, para 4.3	Mixed terms 'tail of stand road vs. 'rear of stand road' used elsewhere (9.2). Means the same thing so should standardise.	Accepted	The paragraph has been amended.
288	Chapter 3,Section 4, para 4.3	Too confusing – requires clarity as currently contradictory.	Not accepted	The CAA does not consider this as contradictory.
289	Chapter 3 para 4.4	The governing principle is that stand length = max aircraft length +7.5m(A-C). The minimum clearance for a hangar at the nose end would be 7.5m (Code Letters A-C) Ch 3 para 4.1 a). The minimum clearance rearmost part of the aircraft is 4.0m from the taxilane strip. Ch3 para 4.2 a) Therefore if clearance is required at front and back ie a hangar one side and a taxilane the other the formula should be max aircraft length+7.5m +4.0m?? Please confirm.	Noted	The paragraph has been amended, However, Chapter 3 will be reviewed in order to reflect the Certification Specifications set out in the impending EASA Aerodrome Rules.
290	Chapter 3, para 4.4, page 68	Based on requirements in clause 4.1 and 4.2, the formula for stand length will be " aircraft length + 11.5m (Code A-C) or 16m (Code D-F). Based on XXX's experience, this requirement can be reduced as per above scenarios where Head of Stand road and or Rear of Stand Road are provided.	Accepted	Chapter 3 is subject to further review and will incorporate the requirements of the impending EASA Aerodrome Rules (Certification Standards).

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
291	Chapter 3, Section 4, para 4.4	Missing guidance on ROS Road	Not accepted	The stand is separate from the rear of stand road.
292	Chapter 3, Section 4.4	Does not take into account the guidance of 4.2 (rear of stand distance) with the “Guidance” given in 4.1	Not accepted	Not accepted. This section details the principles but allows flexibility in different circumstances.
293	Chapter 3, Section 5, para 5.1	Dimension given at	Noted	
295	Chapter 3, Section 6, para 6.1.1	Avoid describing an ISC as a ‘road’. We are advising the community that they are NOT roads and should be used for the purpose described as detailed a-b only.	Accepted	The paragraph has been amended.
296	Chapter 3, para 6.1.1c, page 69	Delete "6 metres" and replace with 7 metres to comply with requirement of Clause 7.2	Accepted	The paragraph has been amended
297	Chapter 3, Section 6, para 6.1.2	Why 7 metres? ISC is not two-way and widest equipment is about 5-6 metres.	Accepted	The paragraph has been amended in order to reflect the requirement in CAP 168, Chapter 3, paras 10.2.2 and 10.2.3.
298	Chapter 3, para 6.2	Presumably, format of training will be left to discretion of the aerodrome.	Noted	Yes, training should be determined at the aerodrome.
299	Chapter 3, Section 7, para 7.2	Why 7 metres?	Accepted	The paragraph has been amended in order to reflect the requirement in CAP 168, Chapter 3, paras 10.2.2 and 10.2.3.
300	Chapter 3, Section 7, para 7.3	Not in favour of MCAs. We had this arrangement at T2 until 2010 and it was hazardous due to complexity and lack of guidance markings on the ground. 7.4 says it all!	Noted	The CAP reflects that, at some aerodromes, multi-choice aprons are used and safely managed.
301	Chapter 3, Section 7, para 7.3. b/c	XXX has several MCA’s and uses a mixture of solid and dashed lines with no confusion occurring. L/R designators also used with no issues.	Noted	
302	Chapter 3, para 7.3d	“*d) Stand numbers will be marked beside the lead in arrows at the taxiway centreline and repeated at the double white line marking the tail of stand;”* Suggest: “d) Stand numbers will be marked beside the lead in arrows at the taxiway centreline and repeated at the double white line marking the **rear** of stand;”	Accepted	The paragraph has been amended.
303	Chapter 3, Section 7, para 7.3.e	Clarify that this is only applicable to existing airports with VDGS and it isn’t a requirement to have them installed for all MCA’s.	Noted	This CAP does not change the VDGS requirements detailed in CAP 168.
304	Chapter 3, Section 9, para 9.3	Agree with the need for a tug box, but dimension may be too generous.	Noted	The CAA will review the contents of Chapter 3 to ensure consistency with EASA Aerodrome Certification Specifications for Stands.
305	Chapter 3, Section 9, para 9.1	XXX objects – 7.5m has always been sufficient with no issues.	Noted	The CAA will review the contents of chapter 3 to ensure consistency with EASA Aerodrome Certification Specifications for Stands.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
306	Chapter 3, Section 9, para 10.1	XXX Objects – this is irrelevant to the operation.	Not accepted	The provision of equipment and parking areas is important to facilitate the operation of vehicles and equipment on stand.
307	Chapter 3, Section 10, para 10.1	Not sure where 22.5% min size for equipment parking has come from?	Accepted	The paragraph has been amended.
308	Chapter 3, para 10.1 and 10.8	These sections have similar content, both mentioning the equipment space percentages: 12.5% and 22.5%. Suggest these sections are consolidated.	Accepted	The paragraph has been amended.
309	Chapter 3, paras 10.3 and 10.5	See comments re: Chapter 4 Aircraft Turnround	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
310	Chapter 3, para 10.3	"*Allocation of the equipment area to specific equipment types should be* ***jointly agreed*** *and supported by the marking of the area to ensure it is effectively managed.*" This is not always practical as airside users have differing perspectives and agendas. Suggest that this is the Aerodrome Operator's responsibility and the allocation of equipment areas does not rely on joint agreement but should be considerate of safety and operational requirements.	Accepted	The paragraph has been amended.
311	Chapter 3, para 10.6	An image of an acceptable ground marking for pre-positioning areas would be helpful here.	Noted.	Diagrams are provided in CAP 637, the IGOM or the ACI Apron Markings and Signs Handbook.
312	Chapter 3, para 10.8	We would like to see Cargo areas covered in more detail here.	Noted	The CAA acknowledges this, however we consider the guidance available elsewhere should be referred to, principally the IATA Airport Handling Manual (AHM) and IGOM.
313	Chapter 3, para 11.1	HSE guidance on managing segregation of pedestrians and vehicles can be found at: http://www.hse.gov.uk/workplacetransport/separating.htm#barriers	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
314	Chapter 3, 11.1	There should be mention here of the use of passenger escorting, lighting and signage.	Accepted	The paragraph has been amended.
315	Chapter 3, para 11.1, page 73	Question if "Zebra Crossing" should be quoted. Use "Pedestrian Crossing" instead	Accepted	The paragraph has been amended.
316	Chapter 3, Section 11, para 11.1	Too specific – contradicts green outline is other manuals. What is the exact definition of 'non-slip' as each manufacturer's have different qualities.	Partially accepted.	Colour flexibility has been added.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
317	Chapter 3, Section 11, para 11.1	Non-slip surface will breakdown and create a FOD issue. XXX have removed all non-slip surfaces from our pedestrian walkways because of this issue and used 2 green lines with a green 'pedestrian' figure motif.	Noted	Green is not mandatory, but is widely used in the UK to for passenger walkways, and is included in the ACI Apron Sign and Markings Handbook.
318	Chapter 3, Section 11.1	Suggest additional text: 'Aerodrome Operators should consider the use of non-slip paint for all surface markings on the stand area to reduce the risk of persons and vehicles slipping on paint lines which are particularly hazardous when contaminated with fluids such as oils, hydraulic fluids, and residue de-ice fluids which occur from time to time and especially during winter operations when the surface might also be contaminated with overlying snow/frost/ice.'	Accepted	The paragraph has been amended.
319	Chapter 3, 11.1	There should be mention here of the use of passenger escorting, lighting and signage.	Accepted	The paragraph has been amended.
320	Chapter 3, 12, 13.1f – There are 2 sections 13.1, this should be 12.1f	"*f) Fire hydrants should be cross-hatched in red.*" Is this a new requirement?	Accepted	The paragraph has been amended and the reference deleted.
321	Chapter 3, 13.1c (should be 12.1c)	"*c) Airbridge manoeuvring areas should be cross-hatched or 'starburst' in white, with a white circle or rectangle denoting the normal retracted position;*" Suggest: "c) Airbridge manoeuvring areas should be cross-hatched **and/**or 'starburst' in white, with a white circle or rectangle denoting the normal retracted position. **These markings indicate that no parking or waiting is permitted**;"	Accepted	The paragraph has been amended.
322	Chapter 3, 13.1d (should be 12.1d)	"*d) Active and redundant fuel hydrant positions should be outlined and differentiated colour wise;*" An example of colour differentiated fuel hydrant positions would be useful here.	Accepted	The paragraph has been amended.
323	Chapter 3, para 13.1b, paga 73	Shouldn't be so specific regarding aircraft types being stencilled on the floor on the centreline. At large airports this becomes cluttered and confusing to pilots. Allow for alternative stop bar marking ie. Numbered stop marks – 1,2,3 which would relate to different aircraft types (1= B747, B777, 2= A319, B737, etc)	Accepted.	The paragraph has been amended.
324	Chapter 3, Section 13, para 13.2.3	787 has a potential requirement for 3 supplies	Noted	The paragraph has been amended.
325	Chapter 3, para 13.2.7	This refers to Chapter 2, 6.12. There is no specific reason seen for this reference.	Accepted	The paragraph has been amended.
326	Chapter 3, Section 13, para 13.2.7	Chapter 2 paragraph 6.12 doesn't reference floodlighting, ref should be Chapter 6 para 7.1.2.	Accepted	Text has been amended.
327	Chapter 3, para 13.2.7	This should refer to the relevant section of CAP 168.	Accepted	The paragraph has been amended.
328	Chapter 3, para 13.2.8	Clarify what HSE requirements are being referred to.	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
329	Chapter 3, para 13.2.13	This statement does not reflect industry best practice. Suggest the inclusion of CAA's expectation of a best practice scenario.	Not accepted	The text provides good operating practice applicable to a wide range of aerodromes, regardless of size or complexity.
330	Chapter 3, Section 13, para 13.2.13	Explains the options for providing FOD disposal, it should specify which is the preferred method as this is guidance on good practice it should state what good looks like.	Not accepted	It is for the airport operator to determine suitable arrangements at its location.
331	Chapter 3, para 13.2.17	Should use PRM terminology.	Accepted	The paragraph has been amended.
332	Chapter 3, Section 13, para 13.2.17	Should include the provision of potable water uplift facility which meets WHO and IATA standards and the arrangements which should be in place to ensure water quality as this has a direct bearing on health.	Noted	
333	Chapter 3, Section 15, para 15.1	Clarify as CAP168 does not require VDGS.	Accepted	The paragraph has been amended.
334	Chapter 3, Sections 15 and 16	Why is this included? Is alignment and stopping different to VDGS? These outdated systems should be withdrawn and a marshaller used if no VDGS.	Not accepted	There is no requirement for A-VDGS on stands that don't require precise parking guidance. Therefore AGNIS/PAPA may still be used, subject to safety assessment by the aerodrome licence holder.
335	Chapter 3, Section 16, para 16.2	Marshalling should negate the need for this	Noted	
336	Chapter 3, para 17.1	The information given about lighting of the SNIB is too detailed. Means of lighting for signs should be determined by the airport operator based upon other ambient lighting.	Accepted	The paragraph has been amended.
337	Chapter 3, Section 17, para 17.1	Again, except when Marshalling is done.	Noted	
338	Chapter 3, para 17.2	What is the relevance of the European description? The CS's do not exist at present. Does CAA permit other combinations at the time of writing?	Accepted	The paragraph has been amended.
339	Chapter 3, Section 17, para 17.2	Irrelevant information.	Partially accepted	The paragraph has been amended.
340	Chapter 3, para 18.1	"*However, this can be reduced if the airlines and handling agents are prepared to adopt the 'snaked' or 'swan-neck' method, particularly if it involves a small aircraft being pushed back into a taxiway wide enough for a much larger aircraft*" Suggest the inclusion of 'push back across cul-de-sac and pull forward on taxiway centreline'	Accepted	The paragraph has been amended.
341	Chapter 3, Section 18.1	Should try to avoid swan necks as these increase risk of collision with road traffic or other parked aircraft. They also put stress on towbars and landing gear. Apron design should allow 90 degree pushback (or straight).	Accepted	The paragraph has been amended.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
342	Chapter 4	**Aircraft Turnround** -I do not believe that HSE had sight of this proposed Chapter prior to publication of the public consultation document. Specific issues of approaching aircraft attaching GPU/FEGP with engines running is actively being explored by an joint CAA/industry led working group under the command of GHOST. For clarity and to avoid potential confusion across the industry, it would be pertinent to await the outcome of their discussions on this subject before publishing any further related guidance.	Noted	On hold, subject to conclusions of GHOST Sub-Group (Approaching Aircraft whilst Engines Running).
343	Chapter 4	For XXX, the most valuable addition so far to CAP 642 as it provides detail to the original intent in HSG 209 but in relation to aircraft safety. This is the HSG209 equivalent! XXX will expect operators with slightly variable procedures to strike down this chapter's inclusion or seek its considerable moderation. Our view is the best practice for aircraft safety must exist and variances may be dealt with through robust risk assessment and regulatory approval processes.	Noted	
344	Chapter 4 Aircraft Turnround	Whilst XXX fully accepts and supports the need for turnaround co-ordination in general, and agree that there should be a nominated person on the ramp with overall safety responsibilities, CAP 642 seems to assume that this will be a specific defined role, close to the traditional 'dispatcher' role. At some points Ch.4 seems to detail a job description and SOPs for a TRC. Our ramp processes are evolving and we use a number of different models worldwide. In our opinion, guidance on turnaround coordination should concentrate on the required tasks and responsibilities rather than assume that this is a single defined role (for example, the key ramp safety tasks & responsibilities could be combined with the loading supervisor role rather than the load control / passenger services 'dispatcher' role) The guidance should leave the task allocation to the airline or GSP.	Noted	This is on hold, subject to the conclusions of the GHOST Sub-Group looking at the process of approaching aircraft whilst engines are running.
345	Chapter 4, Section 1.1, Line 15	Change 'infer' to 'imply'	Accepted	The paragraph has been amended.
346	Chapter 4, Section 2	For this chapter to be effective and reflect the guidance within HSG 209 it needs buy in from the airlines and ground handling operators, which to date has not been forthcoming! What measures do the CAA intend to adopt to support airports in encouraging airlines and ground Handling operators to implement best practice outlined in this chapter?	Noted	This publication reflects good practice, or a model, to be used as the basis when determining locally agreed practice.
347	Chapter 4, Section 2.1	Remove apostrophe ' at end	Accepted	Operators and organisations determine the training requirements and competencies required for task and roles. CAP 700 should assist this.
348	Chapter 4, para 2.1	"*All contractors involved in aircraft turnround should have a copy of the plan, or have developed their own company procedures in accordance with a higher level turnround plan produced by either* ***the airport operator****, or their customer airline.*" It is the airline's responsibility to provide a turnround plan NOT the airport operator.	Noted	It may be applicable at smaller airfields where the aerodrome operator provides handling.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
349	Chapter 4, Section 2, para 2.1 & 2.2	Confusing and some repetition. Lots of references to producing plans, copies of plans, who should have plans, who should have copies of plans etc. More clarity needed.	Accepted	The paragraph has been amended.
350	Chapter 4, Section 2.2	Final sentence duplicates final sentence of 2.1	Accepted	
351	Chapter 4, Section 2.3	First phrase duplicates first phrase of 2.2	Accepted	
352	Chapter 4, part 2.3	This could also include 'loading of cargo, mail or stores' and 'handling of Persons of Reduced Mobility (PRM) and associated mobility equipment'.	Accepted	The paragraph has been amended.
353	Chapter 4, para 2.4	It is confusing to have said the CAP is best practise (introduction) and provide a list here of what in many cases are actually legal requirements	Accepted	The contents of Chapter 4 are subject to further review, post-GHOST and HSE deliberations.
354	Chapter 4, Section 2, para 2.4b	What defines 'competence' for a Turnaround Coordinator? Maybe some guidelines of what knowledge, experience and training a TRC would be expected to have should be added in this section.	Not accepted	Operators and organisations determine the training requirements and competencies required for task and roles. CAP 700 should assist this.
355	Chapter 4, Section 2 para 2.4 b)	Identifying an appointing a competent Turnround Co-ordinator; Identification of Turnround Co-ordinators will an issue as there are no staff trained or procedures in place whereby one person can co-ordinate baggage handling, fuelling, catering, passenger handling, PRM, aircraft toilet servicing and cleaning.	Noted	Operators and organisations determine the training requirements and competencies for task and roles. CAP 700 should assist this.
356	Chapter 4, para 2.4d	"*d) Ensuring that all staff are correctly trained and are doing the right job in the safest way;*" Suggest: "d) Ensuring that all staff are correctly trained and **competent**;"	Accepted	The paragraph has been amended.
357	Chapter 4, para 3.1	First sentence should be changed to the "aviation industry" – airlines and ground handlers should also improve safety, not just airports. Airports are just the location for other organisations' business.	Accepted	The paragraph has been amended.
358	Chapter 4, para 3.2 and 3.3	These sections both contain the sentence: "*The Turnround Co-ordinator should be clearly identifiable to all other companies involved in the turnround and they should ensure that work proceeds in accordance with…*"	Accepted	The contents of Chapter 4 are subject to further review, post-GHOST and HSE deliberations.
359	Chapter 4, Section 3, para 3.4c	Last sentence does not make sense. Consider re-write.	Accepted	The final sentence has been deleted.
360	Chapter 4, para 3.4c	Consideration of workload would be better referred to as task analysis, not risk assessment. A fourth point (d) could be added – that of "presence". The TRC/ supervisor needs to be on the ramp and visible for the majority of the turnround	Accepted	The paragraph has been amended.
361	Chapter 4, para 3.5	"*it is the airline's responsibility to produce a plan that ensures that all activities are properly controlled and co-ordinated accordingly.*" This statement is correct and corroborates the earlier comments re this NOT being an airport operator responsibility.	Noted	The contents of Chapter 4 are subject to further review, post-GHOST and HSE deliberations.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
362	Chapter 4, para 3.6	"*3.6 Similarly, for operators of non-commercial aircraft it is the airline or ramp service provider's responsibility to have a turnround plan that complies as much as possible with the guidance contained in this document.*" As per previous comment.	Noted	The contents of Chapter 4 are subject to further review, post-GHOST and HSE deliberations.
363	Chapter 4, para 4.1a	4.1a The person carrying out the Audit should be wearing a different coloured tabard.	Noted	Local practice will determine how a turnround coordinator (or equivalent named person) is identified.
364	Chapter 4, para 4.1f	4.1f The Staff and contractors should have in place a read and sign.	Noted	The contents of Chapter 4 are subject to further review, post-GHOST and HSE deliberations.
365	Chapter 4, para 4.1g	4.1g All staff and contractors should been shown how and what an Audit covers	Noted	The contents of Chapter 4 are subject to further review, post-GHOST and HSE deliberations.
366	Chapter 4, para 5.1d	Suggest: Change to "Aircraft departure from stand"	Accepted	The paragraph has been amended.
367	Chapter 4, para 5.3	"*Typically, the aerodrome operator's main considerations, which may impact upon the turnround process, are the timely allocation of stands and effective communication and co-ordination of any changes.*" Airport operators have a much larger consideration than this implies. These considerations may include: stand guidance, airbridges, FOD, FEGP/PCA etc. This paragraph should either be deleted or phrased differently to reflect the extremely broad considerations and should not highlight the considerations listed as the "main considerations".	Accepted	The paragraph has been deleted.
368	Chapter 4, para 6.1	Regarding (k): Vehicles do not necessarily have to be in their parking bays – e.g. the interstand clearway may be acceptable. Suggest addition of wording to the effect of " or as otherwise permitted by the Airport Operator"	Accepted	The paragraph has been amended.
369	Chapter 4, Section 6, para 6.1.d	SNIB – Will lighting be compulsory?	Noted	There is no requirement to provide lighting for Stand Number Indicator Boards/Aircraft Stand Identification Signs.
370	Chapter 4, Section 6, para 6.1(m)	Should include 'if applicable'	Accepted	The paragraph has been amended.
371	Chapter 4, Section 7.1	Introductory sentence does not fit here in the arrival/shutdown sequence; this text should go after d) if it goes anywhere	Accepted	
372	Chapter 4, Section 7, para 7.1	Item 'h' is confusing the logical process. At 7.1 it already states 'after engines and beacons off', no need to mention it again. Including it in item 'h' could be seen to indicate that chocks and power are applied before engines and beacons off (following a logical process).	Accepted	The paragraph has been amended..
373	Chapter 4, Section 7.1 h)	Add 'other' and bracketed text: … by engineers or other ground staff (particularly and solely the Turnround Co-ordinator) to confirm ….	Noted	This is on hold, subject to the conclusions of the GHOST Sub-Group looking at the process of approaching aircraft whilst engines are running.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
374	Chapter 4, para 7.1h	"*h) When the aircraft engines have shut down and reached a safe condition to approach, the anti-collision lights are off and chocks are in place, the aircraft can be approached and coned as required."* Suggest this is re-written to reflect the safest sequence of events before approaching an aircraft: "h) When the aircraft engines have shut down, the anti-collision lights are off and chocks are in place, **and reached a safe condition to approach,** the aircraft can be approached and coned as required."	Noted	On hold, subject to the conclusions of the GHOST Sub-Group (approaching aircraft whilst engines running).
375	Chapter 4, para 7i	On point (i) the VDGS does not necessarily need switching off (in some locations it is on a timer that goes off after a set time). A step could be included "positively confirm to the flight crew that the aircraft is chocked. This can be done using the VDGS" This section needs to take into account the wider points regarding when it is acceptable to approach or be near the aircraft with the anti-colls on. See our comments re the GHOST working group and HSE/CAA agreement on what is considered best practice, desirable or acceptable. Examples of this may include: Aircraft does not have APU, APU is u/s, APU is u/s and FEGP is attached to airbridge, engine run or engineering tests being undertaken, air start, pushback, de-icing, marshalling (particularly large a/c when 2 are used) etc. It would be better to wait until the CAA/HSE and industry have identified what is acceptable/best practice before publishing guidance in CAP 642.	Noted	On hold, subject to the conclusions of the GHOST Sub-Group (approaching aircraft whilst engines running).
376	Chapter 4, Section 7.5 b) and c)	Elsewhere above in 642 it states two personnel and two stop buttons; this should be reflected in the text here	Accepted	
377	Chapter 4, para 8.1.1b	There should be a section between 9 and 10 to itemize the 'aircraft servicing' elements such as refuelling, toilet servicing, engineering checks, coning etc. This is referred to in 8.1.1 (*"There are three elements listed here: a) Offload, b) Servicing, c) Onload"*) but the detail is not included in the section.	Accepted	The paragraph has been amended.
378	Chapter 4, para 9, offload process	The turnround co-ordinator should have a responsibility to check the inbound loading for errors. There should be a reporting control at this point.	Accepted	The paragraph has been amended.
379	Chapter 4, Section 9 and throughout	Sub-paragraph system is too complex, especially using both the letter 'i' and Roman numeral 'i', and two layers of the same type of, eg a).. a)	Accepted	This section has been re-ordered and numbered accordingly.
380	Chapter 4, para 9d	"*d) Communicate ready to proceed;"* Who is communicating to whom?	Noted	The text has been amended to clarify that this refers to disembarkation and unloading.
381	Chapter 4, part 9 I) iii)	This could also include 'repatriation of mobility aids with Persons of Reduced Mobility (PRM)'	Accepted	The paragraph has been amended.
382	Chapter 4, Section 9 i) iii) c) and 10 d) i) a)	Dangerous Goods with leading caps, as it is a defined term	Accepted	
383	Chapter 4, Section 10 and throughout	Some lines end in commas and some in semi-colons without any consistency	Accepted	The CAP will be subject to proof-reading before publication.
384	Chapter 4, part 10 d) i)	This could also include transfer of PRM mobility aids to loading team.	Accepted	The paragraph has been amended.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
385	Chapter 4, Section 10 d) i)	New item here and move other items down one: 'i) Refuelling/Defuelling - As emergency procedures for aircraft evacuation need to be adjusted during fuelling/defuelling process, a clear line of communications needs to be established during this process between the fueller, the Turnround Co-ordinator and the aircraft crew.'	Accepted	The proposed text has been incorporated.
386	Chapter 4, para 10 d), iib	Include 'temperature' in animal welfare.	Accepted	The paragraph has been amended.
387	Chapter 4, Section 10 d) ii) b)	Comma after 'water'	Accepted	The paragraph has been amended.
388	Chapter 4, Section 11.1	Needs additional sentence: 'The Turnround Co-ordinator should remain in overall charge of the aircraft departure.'	Not accepted	The paragraph has been amended.
389	Chapter 4, para 11.2	The list should include a FOD inspection prior to pushback.	Noted	FOD check is already included.
390	Chapter 4, para 11.2, page 87	vii) Pushback clearance and any special instruction therefore must be heard and/or confirmed by the tug driver and head-set operator; Re-word as follows:- Pushback clearance and any special instruction from ATC must be heard and/or confirmed by the tug driver and head-set operator;	Accepted	This is on hold, subject to the conclusions of the GHOST Sub-Group looking at the process of approaching aircraft whilst engines are running.
391	Chapter 4, Section 11, para 11.2(a)	"...nets in place..." should include "and tensioned".	Accepted	The paragraph has been amended.
392	Chapter 4, para 11.2.f	Aircraft de-icing may be taking place off stand.	Noted	The contents of Chapter 4 are subject to further review, post-GHOST and HSE deliberations.
393	Chapter 4, para 11.2.h.iv	Suggest addition of the recommendation that ground crew monitor the relevant ATC radio frequency.	Accepted	The contents of Chapter 4 are subject to further review, post-GHOST and HSE deliberations.
394	Chapter 4, para 11.2.h.ix	Additional wording to state that this should be done from a position of safety would be beneficial.	Accepted	The contents of Chapter 4 are subject to further review, post-GHOST and HSE deliberations.
395	Chapter 4, Section 11.2 vii)	Change 'therefore must' to 'should' Not all tugs and almost no headset operators will be able to monitor the R/T.	Accepted	The paragraph has been amended.
396	Chapter 4, para 11.2h vii) and viii)	Neither of these mention the use of wing-men monitoring wing-tip clearance during pushback. This should be included.	Accepted	The contents of Chapter 4 are subject to further review, post-GHOST and HSE deliberations.
397	Chapter 4, Section 11.2 ix)	Needs additional sentences: 'The headset and pin should be held aloft for the pilot(s) to see. When the pilots are uNo further action or comment requiredmiliar with procedures at that aerodrome, the pilots should be briefed in advance of how many personnel to expect, for example whether one person will display both the headset and the pin, or whether two persons will display one each.' (Ed note: I have seen confusion over this lead to a potential running over)	Accepted	The paragraph has been amended.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
398	Chapter 4, Section 12, para 12.1(c)	There should be a statement that if unsafe activities are observed the coordinator must be empowered to stop the job until safe practices can be followed.	Noted	
399	Chapter 4, Section 12 c)	Should be reworded to highlight a check for stand area surface contamination in a more general sense which should be reported to the aerodrome operator and passed onto the next likely user of the stand. Such contamination could include fluid spills, snow, ice, frost, and ought also to include residue from de-ice operations carried out on the stand which present a significant slip hazard. There should also be a responsibility for ensuring that the stand which has been reported as contaminated be properly cleaned and re-inspected prior to the next aircraft arrival.	Accepted	Text incorporating this comment has been added.
400	Chapter 5	Nothing to add	Noted	
401	Chapter 5	XXX supports the inclusion of airside vehicle standards as this is a matter that can radically impact the airside risk profile of an aerodrome as XXX Airport has proven where it controls all airside vehicles tightly, including their maintenance.	Noted	
402	Chapter 5, para 1.1	Are temporary AVPs still going to be issued or will all vehicles require full AVPs?	Noted	Please refer to CAP 790 for guidance.
403	Chapter 5, para 1.3	Who will decide the frequency of the periodic inspections?	Noted	The aerodrome operator should determine the inspection frequency.
404	Chapter 5, para 1.4	"*In some exceptional circumstances this requirement could be waived, for example in respect of sidelights and headlights at an airport where operations at night or in conditions of poor visibility do not take place.*" Suggest using a different example in which a requirement might be waived, e.g. removal of wing mirror due baggage hall access (plastic curtain damage).	Accepted	The paragraph has been amended.
405	Chapter 5, Section 1, para 1.4 / 1.6	Should be 1.5 not 15.5	Noted	The paragraph has been amended.
406	Chapter 5, para 1.8	This appears to contradict the current proposed EASA requirements.	Not accepted	EASA ADR requirements provide for use of yellow obstruction lights.
407	Chapter 5, Section 1, para 1.8	Is it a *'should'* (recommended) or a *'must'* (mandatory)? If CAP168 states that they must have them then it should be a *'must'* and not a *'should normally'*.	Accepted	The paragraph has been amended.
408	Chapter 5, Section 1, para 1.8	'NOTE' should be cross referenced to 5.3 to provide clarity.	Accepted	The paragraph has been amended.
409	Chapter 5, Section 2, para 2.2	Green and Red markings omitted.	Accepted	Red and Green have been added to the text.
410	Chapter 5, para 2.3	Reference should be removed to "other than RFFS and with free-ranging privileges". This is a local instruction per aerodrome and does not need to be included. It implies that all RFFS vehicles can cross at all times.	Accepted	The paragraph has been amended.
411	Chapter 5, para 2.3	"*no vehicle (other than RFFS and with free-ranging privileges) should normally enter the manoeuvring area*" Suggest: "only drivers with the relevant Airside Driving Permit should enter the manoeuvring area"	Accepted	The paragraph has been amended.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
412	Chapter 5, Section 2, para 2.4	Does this apply to the "CP" (Critical part) markings which have started to appear to UK airports to meet the requirement of EC300 / EU185?	Noted	
413	Chapter 5, Section 3, para 3.1(i)	"Vehicles must not be driven across stands". There are operational requirements for some large equipment to use unoccupied stands to move around the airport. A Hi-Loader being driven around a road system will in effect close the road system, likewise, equipment too high to pass safely under airbridge links may need to cross stands. The guidance should allow for this as an operational necessity rather than a short-cut route.	Accepted	The paragraph has been amended.
414	Chapter 5, Section 3 para 3.1 (General Part c)	States "No vehicle should be left unattended anywhere on the airside area with its engine running. This is to prevent risks such as overheating and consequent fire in the vicinity of aircraft, and uncontrolled or unauthorised vehicle." Rather than reading "airside area" it should be "aircraft movement area".	Accepted	The paragraph has been amended.
415	Chapter 5, Section 3, para 3.1(c)	"Unattended" needs to be defined, as some service vehicles are required to have their engines running to operate, is the CAA suggesting an operator sit at the wheel of every vehicle, I do not think this is the intention so please clarify.	Accepted	The paragraph has been amended.
416	Chapter 5, Section 3, para 3.1(d)	Needs clarity. Are we really saying that <u>ALL</u> vehicles must leave the 'airside' when not in use?	Noted	The text does not require all vehicles to be removed from airside when not in use. This text has not been changed from earlier versions of CAP 642.
417	Chapter 5, para 3.1e	"*e) To ensure that no object is dropped on the apron or manoeuvring area, all doors and shutters on vehicles must be closed while the vehicle is moving.* " Suggest: "e) To **reduce the risk of personal injury and to** ensure that no object is dropped on the apron or manoeuvring area, all doors and shutters on vehicles must be closed while the vehicle is moving."	Accepted	The paragraph has been amended.
418	Chapter 5, para 3.1l	"*l) Vehicles should not be driven in reverse on the manoeuvring area or apron unless directly engaged in aircraft manoeuvring or servicing, or during parking positioning. When reverse movement is essential, guidance should be provided to the driver by a person outside the vehicle (banksman) or other means.;* " Suggest the inclusion of: "Banksman must be trained and assessed as competent by their employer"	Accepted	The paragraph has been amended.
419	Chapter 3.5 n	Suggest a new item relating to NOT listening to 'entertainment' radio whilst on manoeuvring area.	Not accepted	Local procedures should specify this.
420	Chapter 5, para 4	There is no mention of M or R permits here. This should be included.	Noted	CAP 790 details the permit system.
421	Chapter 5, para 4	References should be made to CAP790 and 413.	Accepted	The paragraph has been amended.
422	Chapter 5, para 4.1	Control of vehicles on the manoeuvring area is the responsibility of the airport not ATC. ATC will manage the clearances/permission to move around the airfield but the overall control of who is entitled to go on the manoeuvring area is the responsibility of the airport.	Noted	Control is managed by ATC but the policies for the operation of vehicles are set by the aerodrome operator.
423	Chapter 5, Section 4, para 4.3	Needs to have an element discussing competency training too.	Noted	Reference to competence has been included.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
424	Chapter 5, para 4.4	This should refer to CAP790 and the requirement for a permit and training to drive on active runways. CAP 790 does not include this requirement to sign for the conditions by each driver.	Accepted	The paragraph has been amended.
425	Chapter 5, Section 4, para 4.4	This should be added to CAP790 too.	Accepted	The paragraph has been amended.
426	Chapter 5, para 5.4	In the second sentence, suggest: Replace “authorities” with “operator”.	Accepted	The paragraph has been amended.
427	Chapter 5, Section 5, para 5.5(c)	Confirmation that ALL vehicles have been removed from the movement area may not be practical. Pushback may continue to tow and push aircraft in low-viz procedures.	Accepted	The paragraph has been amended.
428	Chapter 5, para 6 Title and para 6.1 - 6.5, pages 91 and 92	R/T – should be RTF	Accepted	The paragraph has been amended.
429	Chapter 5, para 6.1	“*6.1 When operating on certain parts of the airport it will be necessary to use radiotelephony or mobile telephone communications equipment. This may introduce additional risks whilst driving and vehicle operators must ensure that the use of such equipment does not distract the driver from the primary task of driving the vehicle.*” The use of this terminology suggests that it is permitted to use mobile telephones whilst driving. This is specifically banned at many locations. Suggest removal of “*or mobile telephone communications” HANDS FREE?* Unless drivers are being escorted, it is usual for all vehicles on the manoeuvring area must have fitted radios.	Accepted	The paragraph has been amended.
430	Chapter 5, para 6.4	“*6.4 It is recommended that users of R/T equipment who…*” Suggest: Delete first 4 words “6.4 Users of R/T equipment who…”	Accepted	The paragraph has been amended.
431	Chapter 5, para 6.6	This is not necessary as written – there are many portable radios used at an airport (e.g. hand held devices in the terminal) that are not “essential for safety…that ATC is made aware of…”	Noted	
432	Chapter 5, para 7.1	“*Every aerodrome operator should publish rules for the reporting of accidents involving vehicles operating on the airside.*” Suggest this is changed to “accidents and incidents”.	Accepted	The paragraph has been amended.
433	Chapter 5, para 7.3	This should include a reference to CAP 382.	Accepted	The paragraph has been amended.
434	Chapter 5, para 7.4	Clarify reporting requirements for MOR purposes and RIDDOR purposes as it may be unclear to dutyholders what they need to report and to whom.	Noted	CAA considers CAP 382 and other reporting process's are already identified.
435	Chapter 5, para 7.5	Second paragraph should be removed and reference to reporting via HSE website to be inserted, as detail given is not required, and this entry does not provide proactive reporting guidance.	Noted	The HSE shall review all text contained within this CAP and ensure correct and appropriate text and links are valid.
436	Chapter 5, para 8.1 and 8.10	These 2 sections repeat each other.	Accepted	The text in 8.10 has been deleted.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
437	Chapter 5, para 8.4	"*8.4 Individual vehicles and equipment should have their own records containing all maintenance records where relevant.*" Suggest this is re-worded: "8.4 Vehicles and equipment should have individual records including maintenance and fault history records."	Accepted	The paragraph has been amended.
438	Chapter 5, para 8.6	Suggest the addition of: "This inspection must be recorded and the driver completing the inspection must sign/initial the inspection document.	Accepted	The paragraph has been amended.
439	Chapter 5, Section 8, para 8.8	Needs to be less specific as the term 'Prohibition Notice' is not widely used in that context.	Accepted	The paragraph has been amended.
440	Chapter 6	XXX welcomes the inclusion of this training chapter but urges SRG to bolster this prior to publication. The following issues require inclusion:	Noted	Stakeholders would be expected to ensure adequate levels of training and assessment of competency. The contents of this chapter provide a framework for the factors that should be considered, as part of the stakeholder's SMS. It is not intended to be prescriptive nor fully comprehensive.
441	Chapter 6	Linking its importance back to SMS (training is one of the critical components along with promotion)	Noted	
442	Chapter 6	Provide guidance on the training cycle	Not accepted	Dedicated guidance, such as that provided on the SMS pages on the CAA website, provides further information in this respect. www.caa.co.uk/sms
443	Chapter 6	Address the recency issue in relation to safety	Noted	
444	Chapter 6	Address training in relation to authorities, especially delegated authorities	Noted	
445	Chapter 6	Address assessors of competence, their competency and evaluation	Noted	
446	Chapter 6, para 1.1 bullet point 2	"*Developing and co-ordinating training programmes in co-operation with employees,* ***airport licence holders*** *and business partners;"* Does this mean Aerodrome Licence Holders (issued by CAA) or holders of licences to operate airside (issued by Airport operator)?	Accepted	It means Aerodrome Licence Holders.
447	Chapter 6, para 1.1 bullet point 3	"*Delivering appropriate training in a timely fashion;"* Suggest the addition of: "Assessing each employee to confirm understanding"	Accepted	The paragraph has been amended.
448	Chapter 6, para 2.1	"*2.1 All employers have a responsibility to provide information, instruction training and supervision to their employees under the Health and Safety at Work Act and associated* ***regulations from EASA*** *and in the ANO.*" There are no "associated regulations from EASA" published yet. Which EASA regulations does this refer to?	Accepted	The paragraph has been amended to remove reference to EASA regulation.
449	Chapter 6, para 2.1	"*Having a competent and safe workforce makes good business sense as incidents and injuries damage lives and are a needless expense for an organisation.*" This sentence is unnecessary.	Accepted	The paragraph has been amended.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
450	Chapter 6, para 2.1	Advice and guidance on the provision of instructions, information and training can be found at: http://www.hse.gov.uk/simple-health-safety/provide.htm	Noted	CAP 642 shall be reviewed further in order to reflect any subsequent changes arising as a result of the review the HSE is currently conducting into HSG65 (Successful Health and Safety Management).
451	Chapter 6, para 2.2	To ensure consistency of terminology – consider changing 'organisations' to 'employers'.	Accepted	The text has been changed where applicable throughout the CAP.
452	Chapter 6, Section 2, para 2.3	The competency or qualification of the person delivering the training is not identified, this is a key fact in the effectiveness of any teaching or learning. The CAA should give examples of acceptable standards as they do in CAP700. This will help ensure cross company standardisation in training competency.	Noted	The CAA, together with industry, is developing a revised CAP 700.
453	Chapter 6, para 2.4	"*2.4 The aerodrome operator should lead in determining the compatibility of* ***airside training*** *between all airside service providers in order to foster standardisation and to ensure safety training delivers a safe working environment.*" Does this relate to general airside safety training or something else? It is not an aerodrome operator's role to check compatibility between airside training of all airside service providers. The aerodrome operator should set minimum standards and ensure service providers adhere to that – it is not the airports role to establish compatibility.	Noted	This will become necessary under likely EASA Aerodrome Rules concerning oversight of third parties (as part of an SMS). It is envisaged that a future GHOST work programme may also address the issue of training.
454	Chapter 6, para 3.1	The term 'safety training' is very wide and not specific enough.	Noted	
455	Chapter 6, para 4.1	Is the term 'health & safety training' the same as 'safety training in 3.1? This seems very general for the type of publication that CAP642 should be. Could reference not just be made to HSE and best practice?	Noted	On hold, subject to further review by HSE post-HSG65 publication.
456	Chapter 6, para 4.1	Why is the subject of this section only "Health and safety training"	Noted	The text has been broadened to include all training.
457	Chapter 6, para 4.2	This seems very general for the type of publication that CAP642 should be. Could reference not just be made to HSE and best practice?	Noted	HSE shall review the entirety of the CAP in order to provide further clarity and refinement where necessary. Accordingly, this shall include providing updated references and links to their guidance and information.
458	Chapter 6, 4.2.1, Induction Training, bullet point 11	"*Emergency procedures (low visibility/inclement weather);*" This should be separated into 2 bullet points. Low visibility and inclement weather are not usually related to emergency procedures.	Accepted	The paragraph has been amended.
459	Chapter 6, para 4.2.1	Remove Emergency procedures (low visibility/inclement weather) (Should LVPs and inclement weather be considered part of emergency procedures? Emergency procedures already listed under Local Emergency Procedures) Add Weather Procedures (Low Visibility/Strong Winds/Inclement Weather)	Accepted	The paragraph has been amended.
460	Chapter 6, para 4.2.1	This section should include Ramp Safety.	Accepted	The paragraph has been amended.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
461	Chapter 6, para 4.2.1, Induction Training, bullet point 2	"*Safety responsibilities;*" This should include personal responsibilities and rules that apply (Company, Regulatory etc.)	Accepted	The paragraph has been amended.
462	Chapter 7	Nothing to add	Noted	
463	Chapter 7, Section 1, para 1.3	Too much information on the background that is irrelevant.	Noted	Chapter 7 is subject to further review by a GHOST Sub-Group examining a 'Just Culture'.
464	Chapter 7, Section 2.2 and 6.1	A Just Culture is not the same as a no-blame culture and they should not be equated here. The former term is the preferred one in the industry. 3.2 makes the point but 6.1 confuses the issue again.	Noted	Chapter 7 is subject to further review by a GHOST Sub-Group examining a 'Just Culture'.
465	Chapter 7, Section 3, para 3.1.b	It is not clear from the text where a repeated failure by an individual to comply with requirements, even when retrained and guidance has been given, would lead to disciplinary action and possible severe sanctions. For example a repeated failure to drive safely would be a good example of where such action would be necessary, it may not even be the same event being repeated but a series of different safety violations. This may not be interpreted to fall into the categories listed of 'gross negligence, wilful violations and destructive acts'. Perhaps the inclusion of words such as 'repeated failures to meet safety standards' may address such an issue.	Noted	Chapter 7 is subject to further review by a GHOST Sub-Group examining a 'Just Culture'.
466	Chapter 7, para 2.1	"*A sound reporting system should make due allowance for the honest genuine mistakes.*" It is not always clear what constitutes an honest genuine mistake, the preferred terminology appears in section 3.1a in this document: "a) Individuals are not punished for actions, omissions or decisions taken by them that are commensurate with their experience and training but which result in a reportable event;" In the last sentence – "ill discipline and lack of professionalism" are not the accepted terms to include in a punitive reporting system. These are far too subjective.	Noted	Chapter 7 is subject to further review by a GHOST Sub-Group examining a 'Just Culture'.
467	Chapter 7, para 2.2	"*It follows that the most important task is to establish a non-threatening or 'no-blame' (a 'just') culture for the genuine mistake which is honestly reported.*" Similarly this statement mentions 'no blame' this is misleading as there is sometimes blame attached to an incident. The use of the terminology from Ch. 7, 3.1a should be consistently applied throughout this document.	Noted	Chapter 7 is subject to further review by a GHOST Sub-Group examining a 'Just Culture'.
468	Chapter 7, para 2.2	Just culture and no blame culture are NOT the same thing. SMS requires the evolution towards a JUST culture. Suggest seek clearer input on Just culture from SMS Project Group and GHOST. Later guidance in this section is clearer.	Noted	Chapter 7 is subject to further review by a GHOST Sub-Group examining a 'Just Culture'.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
469	Chapter 7, para 2.7	"*2.7 One cause of airside accidents is where personnel trained for low skill tasks are required to carry out these tasks in a 'high-tech' environment. Managers and supervisors must ensure that selection and training recognise the full operational safety requirement: that is, selection and training satisfy the needs of the task and the environment within which the task is to be undertaken.*" What does this mean in practical terms. This should be re-written so that the terminology and message are clear.	Noted	Chapter 7 is subject to further review by a GHOST Sub-Group examining a 'Just Culture'.
470	Chapter 7, para 3.1	"*The CAA espouses a 'Just Culture' in the interests of the ongoing development of flight safety.*" It is not clear here that 'Flight Safety' includes Ramp or Ground Safety. Suggest this statement is amended to reflect the full remit of 'Just Culture' development.	Noted	Chapter 7 is subject to further review by a GHOST Sub-Group examining a 'Just Culture'.
471	Chapter 7, Section 3, para 3.1.b	It is not clear from the text where a repeated failure by an individual to comply with requirements, even when retrained and guidance has been given, would lead to disciplinary action and possible severe sanctions. For example a repeated failure to drive safely would be a good example of where such action would be necessary, it may not even be the same event being repeated but a series of different safety violations. This may not be interpreted to fall into the categories listed of 'gross negligence, wilful violations and destructive acts'. Perhaps the inclusion of words such as 'repeated failures to meet safety standards' may address such an issue.	Noted	Chapter 7 is subject to further review by a GHOST Sub-Group examining a 'Just Culture'.
472	Chapter 7, Section 5, para 5.1	Written with a Ground Handlers bias. Needs to emphasise the importance of the aerodrome authority taking the lead and everyone feeding in to the investigation.	Noted	Chapter 7 is subject to further review by a GHOST Sub-Group examining a 'Just Culture'.
473	Chapter 7, para 5.2	Suggest adding the category "near miss" as well as accidents, incidents and occurrences.	Noted	Chapter 7 is subject to further review by a GHOST Sub-Group examining a 'Just Culture'.
474	Chapter 7, para 6.3.3	"*6.3.3 In the interests of natural justice it will be important for any penalty system to include an appeal procedure.*" What is 'Natural Justice' exactly? Suggest: "6.3.3 any penalty system should include an appeal procedure."	Noted	Chapter 7 is subject to further review by a GHOST Sub-Group examining a 'Just Culture'.
476	Chapter 7, Section 6, para 6.7	Should be bolstered to indicate that the airport authority should/could be involved in deciding a suitable action / time frame.	Noted	Chapter 7 is subject to further review by a GHOST Sub-Group examining a 'Just Culture'.
477	Chapter 7, para 8.1a	"*a) A '**no-blame**' culture, based on company policy to ensure that accidents affecting aircraft and airside safety are reported, in order to protect the public and the workforce from preventable injury;*" Suggest the use of 'Just Culture' not 'no blame'	Noted	Chapter 7 is subject to further review by a GHOST Sub-Group examining a 'Just Culture'.
478	Chapter 7, para 8.2h	"*h) Everybody's concern rather than that of specialists, or worse, nobody's concern;*" Suggest this reads: "h) Everybody's concern;"	Noted	Chapter 7 is subject to further review by a GHOST sub group examining a "Just Culture".
479	CAP 642 Draft	On the whole a very good draft document	Noted	

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
480	All Document	Glossary and abbreviations do not mention or define the word “RAMP” and yet it appears 34 times in the text. Apron on the other hand appears 169 times and is defined. Apart from 1 occasion in CAP168, any reference to RAMP would suggest a gentle incline ramping the ground level to a higher point. CAP790 referred to in 642 does not contain any reference to ramp. Cap382 contains only one reference to ramp Cap393 contains no reference to ramp. Cap637 contains no reference to ramp. Cap789 contains 37 references to ramp Cap493 contains no reference to ramp Cap413 nor any of the supplements contain reference to ramp Cap748 contains no reference to ramp. Cap700 (although 10years out of date) contains no reference to ramp Cap699 contains 4 references to ramp. It would appear that this specific term seems to originate from flight crew documentation and does not get referred to in Air Traffic documents, the majority of aerodrome licensing documents, fuel handling, RT or driving documents. As airside safety management is aligned with safety airside, one would assume it should reflect the licensing, driving, fuel management and guidance for operating on the apron and other airside areas, and not have inconsistencies with use of a term “Ramp”” which is also not defined in the document. In the interests of consistency, simplification and in keeping with general common parlance, the term ramp should be replaced with apron or stand where appropriate. GHOST may wish to include RAMP and a definition of it, but then other documents should reflect that. Which means including definitions in the documents listed above as a minimum? ICAO does not refer to RAMP.	Noted	The revised CAP was drafted with input from stakeholders representing aerodrome operators, ground handling organisations and the HSE, via the Ground Handling Operations Safety Team (GHOST). The phraseology used in the document represents the phraseology used by personnel working within these domains. The term 'Ramp' stems from ICAO's Accident/Incident Data Reporting (ADREP) and is used as standard taxonomy by ICAO to categorize aircraft accidents and incidents and allow safety trend analysis on these categories. The term 'Ramp' will be included in the 'Definitions' of CAP 642 to mean as for 'Apron'.
481	Entire document	We appreciate the effort that all involved have put into this task. The document includes a great deal of relevant and useful airside safety guidance. However, we are uncomfortable with the document in its current form, for the reasons detailed below. We hope that the following comments will be taken as constructive feedback.	Noted	
482	General	There appears to be no listed requirement to carry out an arrival inspection on the aircraft for damage prior to beginning operations. Many carriers have this as a requirement and it is good practice to identify damage at an early stage.	Accepted	The paragraph has been amended.
483	General	Number sequencing is incorrect in several places.	Accepted	Numbering has been revised.
484	General	Chapter number required in footer.	Accepted	The entire document will be paginated and renumbered.
485	General	Air Navigation Order ref should include 2012 amendment	Accepted	The ANO reference has been updated.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
486	General	Either all or no other CAP references should be hyperlinked from the document, at present some in the text are.	Accepted	The CAP will be hyperlinked where applicable.
487	General	Chapter numbers in footers would make document easier to use.	Accepted	The entire document will be paginated and renumbered.
488	General	The words taxiing and taxying are used throughout the document. Suggest that 'taxiing' is the correct UK spelling and only one version should be used.	Accepted	The paragraph has been amended.
489	General	Update of CAP 642 is critical and perceived as overdue in the consulting fraternity that rely on it, considering the parallel developments in aspects impacting airside safety, in particular SMS.	Noted	
490	General	A greater focus that aligns with and reinforces SMS for all operators (especially ground handling providers which are not currently required to implement SMS) will be critical to derive the value expected from a systemic approach to safety.	Noted	The CAA will ensure this accords with CAA guidance found elsewhere on SMS.
491	General	CAP 642 can assist in raising ALARP from above the regulatory minimum to the accepted standard of safety for individual organisations	Noted	No further comment required.
492	General	A greater focus on Human Factors, giving MUCH clearer guidance to operators, is long overdue but must align with ECAST efforts to define syllabus to avoid overlap and confusion.	Noted	The CAA is developing its strategy and guidance on Human Factors.
493	General Comment	Overall, it seems to be padded out with unnecessary introductions to each area that can be edited down to reduce the overall document size. For example, a lot of Chapter 1 regurgitates the HASAWA – perhaps just cross reference it?	Noted	Chapters 1 and 2 will be subject to further review by the HSE, upon publication of HSG65.
494	General Comments	HSG 209 places the requirement for the turnround plans to be produced by the airline. This was because it is the airline that has contractual control of its subcontractors and also decides who and how many activities happen around its aircraft and also the timing of these activities to support the arrival and departure schedule, as part of the purchase of the service it is buying. The draft CAP has multiple references to responsibilities which do not seem to align with HSG209. The overall impression is that there are many responsibilities placed on the aerodrome operator in this draft and less on the airlines and handling agents. Given the scope of this draft CAP this balance does not feel correct. There should be more emphasis on the responsibilities of all airside users not only the Aerodrome Operator.	Noted	This is on hold and subject to the conclusions of the GHOST Sub-Group (Approaching Aircraft whilst Engines Running).
495	General comments	The CAP would benefit from being more succinct and is likely to be better used by industry if important information is more easily accessible. Document is a little wordy and continues to be open to interpretation.	Noted	Apart from the HSE requirements, the CAA accepts that certain text may be open to interpretation by stakeholders. The status of CAP 642 is guidance material which might be considered best or good practice and describes what may be considered a safe system of working. The content is not intended to be prescriptive requirement, except where specific HSE or other regulations are quoted.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
496	General comments	Manpool documents will be a miss, as many airside operators use these as templates.	Noted	
497	General comments	Risk Assessment (Page 8) – this takes you straight to the HSE template, however it should be noted that we were heavily criticised by CAA, during a recent project, for using this template. Does this mean that CAA are now happy with this format.	Noted	On hold, subject to further review by HSE post-HSG65 publication.
498	General comments	It is noted that the number of team members required to undertake an aircraft tow have reduced from 3 to 2. What is the reason for this change?	Noted	CAA guidance is not prescriptive and it is a widespread practice.
499	General comments	Good to see inclusion of HSG Documents with reference particularly to turnrounds.	Noted	Subject to further review by HSE post-HSG65 publication.
500	General comments	Active Performance Monitoring and Management – good to see recommendations around this included.	Noted	
501	General Comments - Approaching Aircraft with Engines Running	A current topic within the scope of this CAP is the subject of approaching aircraft with engines running. As background there has been an incident at XXX and as a result the HSE served enforcement notices on the airline and handling agent, we understand that these have not been removed. HSE wrote an "open letter" highlighting concerns and there have been a number of meetings. It is understood that an updated "open letter" might be forthcoming from HSE but there have been changes of personnel involved and it is not clear where this has got to. Para 6.3.3 (2nd half) states that under certain conditions the approaching of aircraft with either anti-collision lights or engines running "*may be acceptable*". This seems to contradict the HSE open letter. There is also a GHOST sub group planned to look at this specific issue. What the airports require is a common view from both regulators – the CAA and HSE. Also that view should be consistent across the UK as there appear to be some differences within HSE between regions and some airlines and airport operators (XXX) operate in both areas and thus need a common and agreed regulatory position. Also the draft CAP states that it is the aerodrome operator that has to judge a safety case and risk assessment produced by the airline. We do not see why it has to be the aerodrome operator that has to decide what is acceptable. As stated earlier the HSE placed enforcement notices on the airline and handling agent in one case – surely it would be more consistent if the HSE and CAA could jointly issue clarity on this issue that could be applied nationally?	Noted	This is on hold, subject to the conclusions of the GHOST Sub-Group (Approaching Aircraft whilst Engines Running).

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
502	General Comments - SMS	In general terms, under the scope and title of this CAP there are 3 main organisation types who are involved in various ways in "Airside Safety Management". These are the airport operator, the airlines and the ground handlers. There are responsibilities and requirements identified for the airport operator and also for airlines and ground handlers. Airport operators and airlines are both required to have a Safety Management System and an Accountable Manager as part of their approval to operate granted by the CAA. Yet in this draft there is no suggestion of requiring the Ground Handlers to have an Accountable Manager or indeed a Safety Management System. This would appear to be a missed opportunity to fill that gap and put in place a similar regulatory framework for safety management across all 3 types of organisations that all have roles to play and interface in many ways as part of airside safety management. Having said that, Appendix 2A, paragraph 5b) states "*lessons…are disseminated to accountable safety managers within all organisations operating airside*". There is no requirement for ***all*** organisations operating airside to have accountable safety managers. If this sentence is intended to create that requirement it should be more clearly stipulated elsewhere in the draft.	Noted	Reference to having a safety management system is included in the introduction.
503	General Comments - Status of CAP 642	Below are a number of direct extracts from the draft CAP. They come from the "Introduction" and the numbered paragraphs 1 to 4 inclusive. Please provide some clarity as to what CAA expect the precise status of this CAP to be. It is described in many different ways, as follows; "guidance which the CAA considers to be best practice", "the advice and guidance in this document is best described as "accepted or best practice and represents an acceptable way of doing things" "this guidance is not intended to be totally comprehensive" "intended as a guide to accepted good practice""CAP642 represents an accepted way of organising and operating safe working practises which is largely endorsed by industry." "The CAA…shall consider these guidelines as best practice" "The CAA with the support from the HSE…this document forms the basis of acceptable safety arrangements airside." There are significant differences between "best practice", "accepted practice", "acceptable way of doing things" (presumably acceptable to the CAA), "a guide to accepted good practice", "largely endorsed by industry" (that may be true but only after the consultation?), "CAA considers these guidelines…" "acceptable safety arrangements". Para 1.1 in Chapter 3 also states "guidance…to ensure compliance…with….minimum standards" - Guidance cannot ensure compliance. If compliance is required this should be a requirement, not guidance. See above points.	Noted	The CAP status is explained in paragraphs 3 and 4 of the Introduction.
504	General Observation	There appears to be no mention of SMS / snow clearing operations/considerations for environmental issues.	Noted	This is not considered necessary for this publication.

No.	Chapter/Section/Para/ Appendix	Comment	CAA Comment	CAA Response
505	Throughout	Although the term 'R/T' is used in 642 as the term everybody uses and is familiar with, the technically and legally correct term is 'RTF', a term used in other CAA publications such as 413. Personally, I would like to see 'R/T' as the standard correct term, but the fact remains that it isn't, so 642 should address this, perhaps in the introductory text.	Noted	The term RTF will be used.