



European Union Aviation Safety Agency

**Concept Paper**

Groundhandling<sup>1</sup> roadmap

Oversight of Groundhandling Activity

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<sup>1</sup> For a list of activities included in the groundhandling (GH) concept, see the Annex to the Council Directive 96/67/EC and the definition of 'groundhandling service' in [Regulation \(EU\) 2018/1139 of the European Parliament and of the Council of 4 July 2018](#).

A definition of groundhandling is provided in the draft ICAO Manual on Ground Handling (version 2 rev. 12): 'Services necessary for an aircraft's arrival at, and departure from, an airport, other than air traffic services'.



## EXECUTIVE SUMMARY

The initial phase of EASA's project to develop a roadmap for a European regulatory framework for the provision of groundhandling (GH) services at EU aerodromes confirmed that a common approach could offer a safer and more efficient service. This concept paper should be read in combination with a suite of related concept papers that will be discussed at EASA's first GH conference in March 2019. Related concept papers refer to a management system for groundhandling service providers (GHSP), ground support equipment (GSE), training of GH personnel, operational standards for GH services, and staff turnover. This concept paper is intended to trigger discussions on the establishment of a regulatory framework for oversight of GH service providers (GHSP).

Oversight is defined<sup>2</sup> as "the verification, by or on behalf of the competent authority, on a continuous basis that the requirements of the New Basic ... Regulation and of the delegated and implementing acts adopted on the basis thereof ... in respect of which a declaration has been made, continue to be complied with". Member States via their competent authorities thus have the ultimate responsibility and accountability to ensure safety and protection of lives and property<sup>3</sup>.

Article 37 of the New Basic Regulation (EU) 2018/1139 foresees that the GHSP shall provide a declaration to the competent authority to declare their capabilities and to discharge their responsibilities in complying with the EU requirements for groundhandling.

On the basis of such a declaration system, this concept paper presents the key elements of a European common oversight framework for GHSPs that is required to ensure oversight of GHSPs and to establish and maintain an oversight programme, including oversight planning cycle, audits and inspections and unannounced inspections. While some Member States already have included GHSPs into their oversight programme, there is today no common European oversight framework based on a set of common minimum organisation and authority requirements.

This concept paper includes a brief gap analysis between the existing status regarding the implementation of oversight of GHSPs and what needs to be done to cover those gaps. It briefly describes the role of an authority in overseeing GHSPs. In addition, this concept paper describes the shortcomings that have been identified by GH stakeholders, which would remain unsolved if the EU regulator does not propose any action to fill the gaps. It includes proposals to ensure that the GHSPs are overseen and that any findings raised by the competent authority are managed and that identified risks are mitigated.

A common oversight system for GHSPs aims at ensuring significant safety improvements and also reducing the number of audits of the GHSPs by different stakeholders. Likewise the competent authority should consider when establishing its oversight programme, if the GHSP is operating on the basis of accepted industry standards. Since the competent authority is the Member State where the GH activity takes place, close cooperation and task sharing between the competent authorities of the different Member States for the oversight of those GHSPs that are structured with multiple business units with activities in more than one Member State is necessary. Likewise, due to the different organisational set-ups and size of various GHSPs, the oversight program must be scalable and proportionate to the size and complexity of the GHSP to ensure effective and risk-based and performance-based oversight of GHSPs with available resources. Finally, competent authority personnel involved in oversight activities of GHSPs should have minimum qualification requirements and experience.

This concept paper is not a rulemaking exercise. Therefore, it does not propose rulemaking options. Instead, it lists a number of actions for the roadmap to address the identified gaps. Further discussions on critical areas will be necessary to support decision making on the best ways forward.

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<sup>2</sup> See definition of 'oversight' in Article 3.1 of the New Basic Regulation (EU) 2018/1139.

<sup>3</sup> See also Appendix I on a state safety system (SSO) critical elements (CEs) of ICAO Annex 19 - Safety Management, Second Edition, July 2016.



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## 1 Background

The new Basic Regulation (EU) 2018/1139 states that GHSPs shall declare their organisation to the competent authority. Such a declaration system is different from a certification system. The organisation is not required to obtain a certificate from the authority prior to commencing its activity. In a declaration system an organisation must provide information on its activity to the competent authority upon which the authority includes this activity into the authority's oversight programme. This means that the GHSP can start its activity after having provided a declaration to the competent authority, if the GHSP has been granted access to a specific aerodrome in accordance with the GH Directive 96/67/EC. It should be noted that the GHSP must also comply with the provisions of the GH Directive 96/67/EC and its national implementation in the Member States on access to the GH market.

At present, where authorities exercise some oversight of GHSPs, it is either based on directly applicable national oversight requirements or via assessing the air operator's compliance with the European requirements of "contracted activities" under ORO.GEN.205 of Regulation (EU) No 965/2012. In most Member States there is no direct oversight of GHSPs.

This concept paper proposes how to establish an oversight system for GHSPs. Within the boundaries of the New Basic Regulation (EU) 2018/1139, this concept paper outlines:

- a future framework for the declaration and oversight of GHSPs with sufficient flexibility to cater for the different types and business models of GH services;
- training and qualification of authority personnel involved in the provision of GH services in view of a common approach to safety; and
- a cost-efficient framework for the cooperation of Member States in their oversight of GHSPs.

## 2 Description of the issue

### 2.1 Identification of the issue

The new Basic Regulation (EU) 2018/1139 clearly establishes a declaration system for GHSPs that are active on certain European aerodromes as defined by this Regulation<sup>4</sup>. Therefore, the oversight requirements for those GHSPs need to be based on the principles applying to a declaration system.

Today, there is no direct oversight framework for the oversight of GHSPs in most Member States. While some Member States require a certificate or a license of the GHSP, other Member States rely on information provided by air operators via their assessments and audits of their contracted activities<sup>5</sup>, which includes GHSPs.

The information available to authorities on GHSPs safety performance originates from the following:

- safety and compliance monitoring by air operators as per Air Ops requirements, themselves subject to oversight by competent authorities (note: such oversight might not be as thorough in the case of smaller AOC holders with more diverse routes, e.g. due to charter operations);
- aerodrome operators as per ADR requirements, themselves subject to oversight by competent

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<sup>4</sup> See Article 2.1.(e), which defines the aerodromes within the scope of European safety rules: 'This Regulation shall apply to <...> the design, maintenance and operation of aerodromes, including the safety-related equipment used at those aerodromes, located in the territory to which the Treaties apply, which: (i) are open to public use; (ii) serve commercial air transport; and (iii) have a paved instrument runway of 800 metres or more, or exclusively serve helicopters using instrument approach or departure procedures'. EASA has published a list of European aerodromes to whom the Regulation applies under this link: <https://www.easa.europa.eu/easa-and-you/aerodromes#group-easa-downloads>

<sup>5</sup> See Regulation (EU) 965/2012 and in particular ORO.GEN.205 on contracted activities.



authorities;

- oversight by non-aviation authorities, such as organisations responsible for Occupational Health and Safety.

Where authorities obtain information about GHSP via audits and assessments of air operators under their oversight, it might not capture the whole spectrum of the GHSPs activities and safety risks.

Without a regulatory framework for oversight of GHSPs there is a risk that GH staff's training and skills could deteriorate leading to a general deterioration of safety in GH, since many incidents and accidents are linked to human factors in groundhandling.

There is a need to develop high-level performance based authority requirements on oversight of GHSPs, while at the same time allowing authorities to perform effective and cost-efficient oversight of GHSPs.

### **What is a declaration system?**

The main difference between a declaration system and a certification system is that a GHSP under a declaration system must declare its activities and how it discharges its responsibilities to its competent authority. Once a GHSP has obtained access to an aerodrome in accordance with the GH Directive, there is no need to wait for an authority prior approval or license before providing GH services. That means, the GHSP may start its activity, as far as safety is concerned, once it has declared its organisation to the competent authority, notwithstanding compliance with the provisions of the GH Directive 96/67/EC and its national implementation in the Member States on access to the GH market.

After having received the declaration from the GHSP, the competent authority will include this activity in its oversight programme, which is usually developed on a yearly basis. Via its oversight programme the authority will assess the information received on the GHSPs activity and adjust its oversight programme and oversight cycles based on the information received taking into account the size, nature and complexity of activities of all declared GHSPs under its oversight.

Such an oversight programme will usually establish oversight cycles for audits and inspections, which can be reduced or extended depending on the safety performance of the GHSP. The authority may also, at any time, request more information from the GHSP or perform audits and announced or unannounced inspections at any time between oversight cycles.

When determining the oversight programme of GHSPs having declared their activity, the competent authority would, most likely, make a selection of GHSPs to be inspected/audited for inclusion into its oversight planning cycle.

Finally, it is the GHSPs responsibility to notify the competent authority of any relevant changes of its activity, to ensure that the authority always has the latest information available on the activity of the GHSP.

If during an audit or an inspection, the GHSP is found to be not in compliance with the European GH requirements and with the information provided in the declaration, the competent authority can then apply the usual oversight measures; this includes the process of findings and resolution of findings to ensure that the GHSP complies with the requirements.

### **Competent authority linked to the aerodrome where the GH activity takes place**

Similar to the aerodrome safety regulation, the competent authority of the GHSP is the national competent authority of the Member State at whose aerodromes the GH activity takes place.

In line with the requirements for aerodromes, the 'national competent authority'<sup>6</sup> of the GHSP is linked to

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<sup>6</sup> See point 34 of Article 3 of the new basic Regulation (EU) 2018/1139: national competent authority' national competent



the aerodrome's competent authority where the GHSP performs its activities<sup>7</sup>. This means that a GHSP with activities in several aerodromes that are based in different Member States will need to declare its activities to more than one national competent authority, similar to the existing requirements for aerodromes, which are, however, subject to a certification requirement.

A constraint to consider for oversight is the common organisation of GHSPs in headquarters and stations. In addition, the GH market is a global market, with GHSPs being part of European or even international parent companies. A GH company may have stations in several Member States, or its headquarters may be outside an EU Member State.

In addition, oversight has to take into account the different types, complexity and sizes of the GH activity. However, the different company structure models also need to be accounted for: some GHSPs may have several independent subsidiaries operating at a single airport, with or without a common management system, while other GHSPs owned by a single parent company might operate based on a common management system, but slightly different business models for each station.

The future framework should also address the question whether oversight is required of GHSPs and their services when part of the GHSP is located outside the territory of the EU, but where the GHSP provides services on behalf of an EU aircraft operator (e.g. the load control services performed for an EU operator from a location outside Europe, e.g. Asia).

## **Cooperative oversight, exchange of safety relevant information and the role of industry standards**

Specific and systematic cooperative oversight requirements are necessary for the oversight of GHSPs to effectively implement performance-based oversight of GHSPs and to avoid that GHSPs active in several Member States, who need to declare their activity to different competent authorities, are subject to contradictory or overly burdensome oversight by different competent authorities in different Member States.

Therefore, a future oversight system should establish a clear mechanism of cooperation and coordination between authorities in order to ensure effective and cost-efficient oversight<sup>8</sup>. Cooperative oversight arrangements could also include elements of task sharing, whereby inspections and unannounced inspections reflecting the safety performance and risk exposure could be performed at the GHSPs stations and more in-depth audits by another competent authority, e.g. where the GHSP has its principal business unit.

Furthermore, given the importance and wide application of industry standards in GH, there is a need to ensure a common approach of competent authorities with regard to considering industry standards in their oversight programme<sup>9</sup>.

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authority' means one or more entities designated by a Member State and having the necessary powers and allocated responsibilities for performing the tasks related to certification, oversight and enforcement in accordance with this Regulation and with the delegated and implementing acts adopted on the basis thereof, and with Regulation (EC) No 549/2004.

<sup>7</sup> 'The national competent authority of the Member State where the aerodrome is located shall be responsible for those tasks with respect to the aerodrome certificate referred to in Article 34(1) and the certificate for an aerodrome operator referred to in Article 37(1). That national competent authority shall also be responsible for the oversight and enforcement tasks with respect to organisations responsible for the provision of groundhandling services or AMS at that aerodrome....'

<sup>8</sup> See also point (e) of Article 1.1 of the New Basic Regulation (EU) 2018/1139: 'This Regulation <...> aims to <...> promote cost-efficiency, by, inter alia, avoiding duplication, and promoting effectiveness in regulatory, certification and oversight processes as well as an efficient use of related resources at Union and national level'.

<sup>9</sup> See also point (d) of Article 1.3 of the Regulation (EU) 2018/1139, which establishes the objectives to establish and maintain a high uniform level of civil aviation safety in the Union, by: 'the development with the involvement of <...> industry bodies, of



A future oversight system should also include mechanisms for the exchange of safety-relevant information resulting from oversight activities of all other related aviation domains; i.e. information from aircraft operator or aerodrome operator activities that is relevant for the safe delivery of GH services should be shared with the affected GHSPs and vice versa.

In addition, to be able to use the results of any audits performed by an industry standard, the authority should apply commonly accepted criteria to assess whether the industry standard is indeed suitable and fulfils the needs of the competent authority. Such criteria already exist in the Regulation applicable to EU air operators' oversight<sup>10</sup>.

## 2.2 Identification of the possible ways forward

The following actions are proposed for the roadmap:

1. Develop GHSP **specific oversight requirements** for national competent authorities for the direct oversight of GHSPs on the basis of a declaration system for GHSPs and on the acceptance of the declaration and define declaration system vs. certification system.

The common oversight framework should also address the **management of change**; in particular when the competent authority is subject to one or several important change(s) to its organisation, such as, e.g.:

- a) staff fluctuation within the authority;
  - b) a new area to be overseen;
  - c) uncertain level of training of inspectors – at least in the transition period;
  - d) new cooperative oversight arrangements;
  - e) assessment of the management system of the authority with properly established SPIs in the GH area;
  - f) a reporting system;
  - g) new interfaces;
  - h) oversight of various business models.
2. Propose a framework for efficient, systematic and cost-effective **cooperation of competent authorities in their GH oversight** activities. Such cooperative oversight framework must take into account the vast variety of GH business organisations across European Member States, with many of them being active in more than one Member State. The framework should:
    - a) define cooperative oversight and common audit mechanism to ensure a reliable cross member state level of oversight
    - b) consider how audits at GHSPs' principal place of business will be conducted in case of multi-national GHSPs.
    - c) Assess possibility of shared oversight via sharing of oversight tasks between competent authorities.
    - d) Enable an efficient and systematic exchange of information on findings raised and inspections/audits made.

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<sup>10</sup> See EASA Decision to Part-ARO to Regulation (EU) 965/2012 on air operations: AMC1 ARO.GEN.305(b);(c);(d);(d1) 'Oversight programme'. Detailed technical standards to be used as a means of compliance with this Regulation, and with the delegated and implementing acts adopted on the basis thereof, where appropriate'.



- e) Explore a common and harmonised declaration system.
3. Enable the consideration of **industry standards** when determining the oversight programme. A common approach is needed to define how the competent authority should consider the implementation by the GHSP of such standards. Different industry standards, tailored to the needs of the industry should be recognised as a basis.
  4. Develop a common framework of high-level and basic GH **inspector competencies and qualifications**, e.g. on training and experience. This is needed to ensure that the common harmonised oversight requirements are applied in the same way across European Member States where more than one competent authority exists for a GHSP and to ensure a level-playing field. Such a framework of inspector competencies should ensure that training and qualification of inspectors overseeing GH activities are documented and recorded by competent authorities.
  5. Encourage **close cooperation within the competent authority between the different oversight activities** related to groundhandling, air operations and aerodromes to exchange information on audits performed by air operators and aerodromes on GHSPs.

## 2.3 Analysis of impacts

### 2.3.1 Safety impact

The current system entails a safety risk because there is no common approach that gives authorities direct information on the safety of GHSPs' activities. GHSPs are not directly overseen based on a common oversight framework. Competent authorities mainly obtain information on GHSPs activities via information derived from audits/verifications from air operators or aerodromes under their oversight. . A direct oversight framework would ensure compliance with the safety related minimum requirements for GHSPs.

Such an oversight framework with a direct involvement of the competent authority expected to increase the confidence of GH staff to report near misses and other safety issues/events.

The recognition of industry standards and industry audit programs is expected to increase the use of such standards. Standardisation is expected to improve the safety performance.

### 2.3.2 Environmental impact

No environmental impact.

### 2.3.3 Social impact

A European oversight framework on aviation safety, including requirements for oversight of GHSPs, will recognise the GH domain as one important part of the aviation safety chain. With this recognition it will be easier for the general public to understand why GH and the work carried out by GH professionals is a crucial element of aviation safety. Proper recognition granted to the whole GH domain by citizens and business partners will raise the prestige of jobs in GH.

Effective and cost-efficient oversight will positively impact the GH labour market. A common oversight framework will ensure application of common training requirements and thus create better job prospects. Appropriate oversight of GH by the competent authority is a prerequisite to ensure new rules are adopted





and followed.

#### **2.3.4 Economic impact**

The expected safety benefits from a proportionate authority oversight and the reduction of duplicate audits are expected to weigh out initial costs that might result from having to set up a new system.

Higher economic impacts can be expected for authorities that have never overseen GH activities in the past, via obtaining and assessing information on GH activities from oversight of air operators or aerodromes. Also authorities that already oversee GHSPs would have to adapt their oversight to the new European oversight framework.

Where authorities already today perform GH inspections there should not be a significant additional administrative burden.

Qualification of staff to oversee GHSPs will also entail costs for authorities that currently do not oversee GHSPs.

Efficient cost control is expected from a cooperative oversight approach. Furthermore, the consideration of industry standards and industry audit programmes offers possibilities to alleviate the pressure on competent authorities who had not included GHSP in their oversight before.

This concept paper acknowledges that Member States apply and will continue to apply different fees and charges schemes to finance oversight activities. Therefore, the economic impact will differ depending on the Member States' fees and charges scheme.

#### **2.3.5 Proportionality issues**

Not all GHSPs at all European aerodromes will be subject to the oversight framework. Oversight of GH is linked to the aerodrome where the GH activity takes place. Under paragraph 7 of Article 2 of the New Basic Regulation (EU) 2018/1139 'Member States may decide to exempt from this Regulation the design, maintenance and operation of an aerodrome, and the safety-related equipment used at that aerodrome, where that aerodrome handles no more than 10 000 commercial air transport passengers per year and no more than 850 movements related to cargo operations per year, and provided that Member States concerned ensure that such exemption does not endanger compliance with the essential requirements referred to in Article 33. From the date specified in that exemption decision, the design, maintenance and operation of the aerodrome concerned and the safety-related equipment and groundhandling services and AMS at that aerodrome shall no longer be regulated by this Regulation and by the delegated and implementing acts adopted on the basis thereof.'

This means that GHSPs who would not be included within the scope of the new Basic Regulation may still be subject to oversight depending on the Member State's decision.

Smaller GHSPs may struggle to initially comply with the declaration and oversight if they provide GH services at an aerodrome to which the EU safety regulations apply.

Therefore, for all GHSPs within the scope of the EU safety regulations, proportional and risk-based oversight will ensure that oversight takes into account the size and nature of the GHSP. Therefore, the authorities' oversight programme for GHSPs must take into account the size, nature and complexity of activities of declared GHSPs and possible certification based on industry standards.

Any future framework for oversight must apply the same oversight principles as in the other aviation domains, i.e. air operations, and propose flexible rules which allow different solutions considering the size of the organisation (e.g. complex or less complex organisation).



### 2.3.6 Impact on regulatory coordination and harmonisation

Where the GHSP is active on aerodromes in several Member States, the Regulation mandates a declaration to the competent authority of the aerodrome where it provides services. The authorities will need to consider how to oversee GHSPs in their Member States, when relevant management functions, e.g. the management system, are managed outside the Member State, depending on the organisational set-up of the GHSP.

Where authorities need to exchange information in a systematic way, some stakeholders expressed the idea that next to systematic cooperative oversight there could also be a future groundhandling 'SAFA' programme to ensure more efficient oversight.

Based on the assumption that there will be common requirements for GHSPs, e.g. on training and qualification of GH staff, and since industry standards exist, the national competent authorities will be able to rely on those harmonised requirements/ industry standards.

### 2.3.7 Impact on existing organisations including EASA

In order to develop an oversight programme of GHSPs, competent authorities will need to develop appropriate policies, procedures within their authorities; this will most likely include the establishment of a dedicated Ground Operations unit. EASA will include oversight of GHSPs into its standardisation programme.

## 3 Conclusion

One of the key issues of oversight is the question of the competent authority of the GHSP and how the GHSP will be overseen by the competent authority. This means that any future oversight framework for GHSPs needs to state clearly whether and how it applies to GHSPs.

The new Basic Regulation mandates a 'declaration system' for GHSPs. From an administrative point of view as with all other European safety requirements, oversight requirements in a 'declaration system' are less burdensome than oversight requirements in a certification system. In a declaration system, the GHSP informs of, i.e. declares, its activities and provides detailed information on its activities to the competent authority. Yet, the GHSP is not required to obtain a certificate, licence or authorisation certifying it operates in accordance with European safety standards or whenever certain changes requiring prior approval are introduced into the operation.

Instead, in a declaration system, the GHSP can start its activity after having sent the declaration to the authority, provided that it also complies with the European GH Directive and other national provisions, and consequently needs to inform the authority of any changes to its activity. The authority will assess the information received, possibly request further information from the GHSP, then will include the GHSP in its oversight programme.

When performing oversight of the GHSP, the authority should assess/oversee compliance of the GHSP with the applicable EU requirements and apply the appropriate oversight procedures, e.g. findings and resolution of findings in case of non-compliance.

For this reason, the possible way forward when establishing a European oversight framework for GHSPs should address the following:

- specific high-level oversight requirements on the acceptance of the declaration and oversight procedures and processes that mirror the basic minimum organisation requirements for GHSPs,
- systematic cooperative oversight provisions to ensure efficient exchange of information between competent authorities,
- how to consider industry standards in the oversight programme, as well as audits performed by aerodrome and aircraft operators on GHSPs,



- how to establish a minimum training and competency framework for inspectors overseeing GHSPs.

The oversight framework should enable performance-based oversight that requires some basic set of skills, training and qualification of the inspector, but does not require highly specialised staff, e.g. a mechanic to oversee equipment standards. Better suited for a European framework would be a high-level regulation that ensures GHSPs comply with the minimum requirements and operate safely to meet their customers' needs.

Oversight by Competent Authorities will be challenging as most competent authorities today do not exercise oversight and do not have experienced personnel in this domain. The necessary transition periods for authorities and GHSPs are therefore a prerequisite.



## 4 References

### 4.1 Example from an authority on the current personnel training and competency framework for oversight of the air operator, which includes information on audits performed by the air operator related to groundhandling.

#### TM-35 Training Process

When a new candidate is selected from the aviation industry to become Inspector she/he Initial Inspector Evaluation (QSM-FRM-003) is being done by Department Manager/Head of Office, Assistant Director, Quality Manager and Training Manager, and after that she/he should be issued an authorization of INSPECTOR - trainee. She/he must then complete the training requirements specified in this document before being given the authority to accomplish any inspector Job Task without direct supervision.

All new hired Inspectors - trainee normally begin training with Initial training (STAGE 1 & 2). During Stage 2 of the Initial training a new Inspector-trainee should start with OJT training. At this point any task must be performed under the direct supervision of OJT Instructor. Upon completion of Basic Training and OJT associated with Job Tasks, she/he will be again evaluated using Inspection Evaluation (QSM-FRM-003), and after that if positive evaluated, she/he will be given authorization for an Inspector with Basic Authorization. After finishing Basic Training, Inspector might begin Additional Training (STAGE 3) and continue with OJT, if applicable. Upon

completion of Additional Training and OJT associated for Job Tasks, she/he will be again evaluated using Inspection Evaluation (QSM-FRM-003), and after that if positive evaluated, she/he will be given Additional authorization as an extension to their Basic Authorization.

Inspectors also require the continuous development of their knowledge and skills. This should be accomplished through recurrent training and refresher courses.

Some regulations call for practical training which is intended to instruct on audit/inspection techniques and specific areas of attention without interference with the operation. CCAA will ensure that elements of practical training are covered through Basic Training Courses and accompanied OJT.

#### STAGE 1 - INITIAL TRAINING PROGRAMME FOR ALL CCAA INSPECTORS

ATTENDEES	TRAINING COURSE	TRAINING CODE
ALL INSPECTORS, MEDICAL ASSESSORS & SPECIALISTS	CCAA Indoctrination Course	CCAAIND
	Civil Aviation Law and Organizations – General Framework	REGGEN
	Management System	MSGEN
	Ramp Safety	RMPSFT
	Safety Management System	SMS
	Auditors Course Basic	AUDBSE
	Inspector Enforcement	INSENF

## STAGE 2:

h) The Initial training for AERODROME INSPECTORS towards Basic Authorization:

AUTHORIZATION	TRAINING COURSE	TRAINING CODE
AP AUTHORISATION	Aerodromes Department Procedures Manual - Theory <sup>18</sup>	AP MAN
	Specific area regulatory laws and standards - Aerodromes regulations <sup>19</sup>	REG AP
	Human factor training	HFT
	Dangerous Goods Regulations	DGR
	Obstacle assessment	OBST
	Airport charges <sup>20</sup>	AP CHG
	Emergency planning and response for airports and GSP	EMRA
	Implementing Aeronautical Data Quality (ADQ)	IM ADQ
	OJT AP LEVEL 1,2,3	OJT AP

## STAGE 3: Specific training for Groundhandling services

AUTHORIZATION	TRAINING COURSE	TRAINING CODE
AP/GHC SPECIFIC AUTHORIZATION	Aerodromes Specific area regulatory laws and standards	AD REG
	Load Control	LOD
	Passenger and baggage handling	AP PBH
	Cargo handling	AP CGO
	Aircraft handling	AP HDL
	Dangerous Goods Advanced	DGR A
	OJT GHC LEVEL 1,2,3	OJT GHC

## 4.2 Example from an authority on the current personnel training specific to station inspections of GHSP via the audits and assessment performed by the air operator.

1. Ground handling: definition, processes, challenges, safety risks
2. Regulatory and non-regulatory framework, including industry provisions
3. Ground handling as part of air operator certification
  1. Processes
  2. Local arrangements
  3. Documentation
  4. Training
  5. Compliance monitoring
  6. Operational procedures
4. Air operator station audit:
  1. Interviews
  2. Turnaround process inspection (ramp + gate + ...)
  3. Taking into account the organisational structure (HQ / stations, subcontracting)

#### 4.3 Example of criteria that can be used to assess an industry standard is contained in the AMC to Regulation (EU) 965/2012 on air operations, Annex II – Part-ARO

##### AMC1 ARO.GEN.305(b);(c);(d);(d1) Oversight programme

###### *INDUSTRY STANDARDS*

- (a) For organisations having demonstrated compliance with industry standards, the competent authority may adapt its oversight programme, in order to avoid duplication of specific audit items.
- (b) Demonstrated compliance with industry standards should not be considered in isolation from the other elements to be considered for the competent authority's risk-based oversight.
- (c) In order to be able to credit any audits performed as part of certification in accordance with industry standards, the following should be considered:
  - (1) the demonstration of compliance is based on certification auditing schemes providing for independent and systematic verification;
  - (2) the existence of an accreditation scheme and accreditation body for certification in accordance with the industry standards has been verified;
  - (3) certification audits are relevant to the requirements defined in Annex III (Part-ORO) and other Annexes to this Regulation as applicable;
  - (4) the scope of such certification audits can easily be mapped against the scope of oversight in accordance with Annex III (Part-ORO);
  - (5) audit results are accessible to the competent authority and open to exchange of information in accordance with Article 15(1) of Regulation (EC) No 216/2008; and
  - (6) the audit planning intervals of certification audits i.a.w. industry standards are compatible with the oversight planning cycle.

