

# Draft EU Ground Handling Regulation

## Annex III – Organisation Requirements

Consultation Webinar

30 June 2022

**Your safety is our mission.**

# Agenda

## Welcome and Introduction

14:00 – 14:45

Legal Background and Scope of the future GH Regulation

14:45 – 15:00

Q&A, discussion

15:00 – 15:15

Break

15:15 – 16:00

Organisation Requirements (Annex III)

16:00 – 16:15

Q&A, discussion

16:15 – 16:30

Break

16:30 – 16:45

Operational Requirements (Annex IV)

16:45 – 17:00

Q&A, discussion

17:00 – 17:15

Break

17:15 – 17:30

Authority Requirements (Annex II)

17:30 – 17:45

Q&A, discussion

17:45 – 18:00

Conclusions and Next Steps

End of Webinar

# Draft Annex III (ORGH)

## Annex III – Organisation Requirements

ORGH.GEN - General requirements

ORGH.MGMT - Management system

ORGH.DEC - Declaration

ORGH.DOC - Documents and records

ORGH.TRG - Training of GH personnel

ORGH.GSE - Ground Support Equipment

# General requirements

## Annex III – Organisation Requirements

### **ORGH.GEN - General requirements**

ORGH.MGMT - Management system

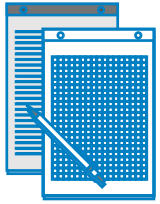
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# Content of draft ORGH.GEN

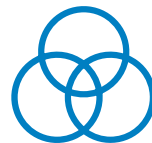


- Scope – to whom the regulation applies
- Who is the competent authority of a GHSP
- Responsibilities of a GHSP – standard rule for all aviation domains
- Starting operation – prior arrangements, if any
- Means of compliance – standard rule on possibility of AltMoC
- Findings and corrective actions – standard rule for all aviation domains
- Immediate reaction to a safety problem – standard rule
- Occurrence reporting – standard rule for all aviation domains
- Use of alcohol, psychoactive substances and medicines – like ADR

# Scope (draft ORGH.GEN.005)



- To whom does the regulation apply?
  - Independent GHSP,
  - Aircraft operators performing self-handling to their own fleet and passengers,
  - Aerodrome operators performing GH services, and
  - Any other organisation performing GH services
- At aerodromes under the Basic Regulation scope



# GH services – Basic Regulation definition

“(23) ‘groundhandling service’ means any service provided at aerodromes comprising **safety-related activities** in the areas of

- ground supervision,
- flight dispatch and load control,
- passenger handling,
- baggage handling,
- freight and mail handling,
- apron handling of aircraft,
- aircraft services,
- fuel and oil handling, and
- loading of catering;

including the case where aircraft operators provide those groundhandling services to themselves (self-handling)”

# GH activities covered by other EU regulations

- **Load planning, Mass&Balance calculations, Load Control documents issuance:**
  - Under the management of the aircraft operator, regardless of who performs them or where. Reg. (EU) 965/2012 on air operations applies.
- **Flight dispatch:**
  - Typical operational control task, under the management of the aircraft operator. Reg. (EU) 965/2012 applies.
- **Ground supervision performed by the aircraft operator as self-handling:**
  - Under the management of the aircraft operator. Reg. (EU) 965/2012 will apply.
- **Oil handling:**
  - Typical maintenance task. Reg. (EU) 2014/1321 applies.
- **Apron management services:**
  - Covered by Reg. (EU) 139/2014 on aerodromes.





# Competent authority of a GHSP...

→ .... is the authority of the aerodrome where the GH service is provided (draft ORGH.GEN.105)



# Responsibilities of the GHSP (draft ORGH.GEN.110)

- Basic Regulation, Annex VII – Essential Requirements:
  - Comply with applicable requirements, incl. applicable procedures of aircraft operator and ADR operator;
  - Management system and management of safety risks;
  - Occurrence reporting system. Transmit the occurrences to the reporting system of the aerodrome operator, the aircraft operator and, if relevant, to that of ATS provider;
  - Manuals for operation and maintenance of the Ground Support Equipment (GSE);
  - GH service manual;
  - Trained and qualified personnel; ensure continuing competence of all relevant personnel.



# Starting operation (draft ORGH.GEN.115)

- A GHSP can start operating as soon as it:
  - Has submitted the declaration to the competent authority of the aerodrome where it will provide services;
  - Has made any necessary arrangements with the aerodrome operator, e.g.
    - Required ADR training of its personnel (e.g. driving, pedestrians, marshallers);
    - Permit to work on the airside; security clearance;
    - Agreement on needed facilities (office space, GSE parking, warehouse, etc.);
  - If applicable, has obtained authorisation as per Council Directive 96/67/EC.



# Management system

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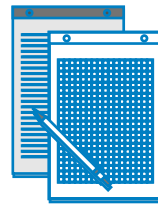
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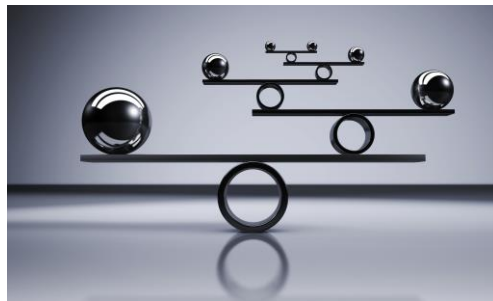


- **Management system** – integrated; similar to OPS, ADR; includes SMS
- Information security management – EASA Opinion 03/2021; new scope under BR
- **Contracted activities** – application of this regulation to contracted service providers
- Personnel – similar to OPS, ADR
- Facilities – similar to OPS, ADR
- Interfaces with other organisations – NEW! As per ICAO Doc 10121
- Safety programmes – participation in the safety programme of ADR operator
- **Safety reporting system** – similar to Apron Management Services (AMS)
- Emergency response plan
- Software equipment – NEW. Considers IT equipment of GHSP

# Management System



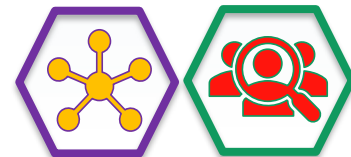
- A Basic Regulation provision
- Focus on a simple structure of the management system, to enable an organic growth into complex structures (ORGH.MGMT.200)
  - Integrated: Organisations already having a management system should only add the new GH elements; no need to develop a separate Management System
  - SMS included
  - Functional interfaces to share safety information between ADR Operator, Aircraft Operator and GHSP



# SMS – station-centric approach

→ Why this approach? Because:

- It is how business is conducted today, while also allowing an overall perspective over the whole management system
- Easily applicable to all GHSP business models
- Easy to implement and check effectiveness of GHSP's management system
- Highlights issues where local deviations from Headquarter policies and procedures are needed, or where there is a systemic issue within the management system



# Contracted activities

Draft ORGH.MGMT.205

## To a regulated\* service provider

The contracted provider is responsible for the safety of its services and has to comply with the GH regulation.

\* regulated by an EU aviation regulation, e.g. another GHSP

## To a non-regulated service provider\*

The GHSP is responsible that the contracted provider is included in its SMS and the contracted services are provided at the level of safety required by the GHSP.

\*not covered by this or any other EU aviation regulation





# Declaration

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# Declaration



- A Basic Regulation provision: GHSP will operate under a declaration regime
- What does it mean?
  - Main responsibility for compliance is with the GHSP.
  - No prior approval needed.
- Declaration purpose:
  - Informs the competent authority of the aerodrome(s) where the GH services are provided of the existence of a GHSP at those aerodromes.
- No certification process and no certificate or licence under this regulation.

# Declaration – how does it work?



- GHSP submits a declaration, then it can start operation.
- Declaration form is structured into 2 parts (see Appendix I to ORGH.DEC)
  - The first part: general info about the organisation
  - The second part: info about GH services provided at each aerodrome
- The GH regulation will include also a ‘grandfathering’ provision
  - Enables GHSP already operating to continue providing GH services without interruption while transitioning to the new system (draft Article 8 of the Cover Regulation)



# Documents and records

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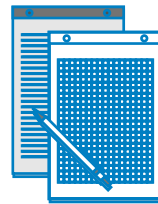
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# Content of draft ORGH.DOC

- Documents and records
- Record keeping
- Ground handling service manual

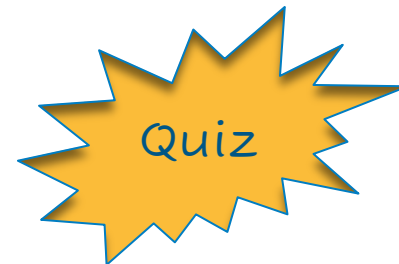


# Ground Handling Service Manual (GHSM)

- A provision of the Basic Regulation
  - Flexible organisation of the GHSP – one manual, several manuals, integrated manuals with the other certified or authorised activities, etc.
  - The GH elements may be included in existing manuals (OPS Manual, ADR Manual, GOM, IGOM, etc.)



- *Quiz: Which sets of manuals and procedures do you use in your organisation?*



# Training of GH Personnel

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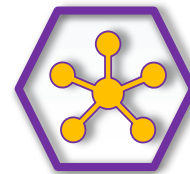
ORGH.GSE - Ground Support Equipment

# Training of GH personnel

→ Presentation by Dave Rogers, Swissport



# Training



## ☐ A provision of the Basic Regulation:

- ✓ “GHSP shall use only adequately trained and qualified personnel and shall ensure the implementation and maintenance of training and checking programmes to ensure the continuing competence of all relevant personnel”

## ☐ Competency-based training and assessment (CBTA) process

- ✓ Only for safety-relevant GH functions
- ✓ Follows the approach in other aviation domains
- ✓ Develops necessary competencies
- ✓ Focuses on knowledge, skills and attitudes
- ✓ Occurs in a realistic learning environment

# Implementing rules on training

## Annex III (ORGH.TRG) – Training of ground handling personnel

### → ORGH.TRG.100

- ☐ Causes a GHSP to develop, implement and maintain a training and assessment program with the aim that the GHSP delivers a safe service for all stakeholders.
- ☐ Scalable to meet the needs of all GHSP.

# Acceptable means of compliance (AMC)

## → AMC1 ORGH.TRG.100:

- ☐ Assists a GHSP in considering how to meet the ORGH.TRG.100 requirement in topics to include.

## → AMC2 ORGH.TRG.100:

- ☐ Continuing assessment and subsequent retraining

# Maintenance of training and checking programmes

IATA AHM1110 gives as a globally harmonized industry standard:

## 4.3.2 Recurrent Assessment

Recurrent assessment conducted by a competent person as defined by the organization (e.g., qualified trainer or assessor) assesses the existing knowledge, skills and operational competence of personnel, which is documented for evidence of completion and for audit purposes. The scope of the recurrent assessment shall cover the elements covered in the initial task training syllabus. This provides the opportunity for assessments during a range of different operational conditions and shall require the employee to perform the task without error, to be determined competent.

Such assessment shall include:

- (a) Behavioral observation of the task
- (b) Assessment of task performance and skills
- (c) Debriefing upon completion.

Examples of recurrent assessment are included in Section 12 to demonstrate the level of detail required to perform and record recurrent assessment.

Recurrent assessments shall be documented and take place at least every 36 months but may be more frequent if an employer identifies a trend or need that requires action. In the event of any gaps in operational knowledge or practical competence the employer shall introduce suitable corrective actions such as:

- (a) Coaching to support the employee to practice the skills to achieve the standard expected
- (b) Supervision to support the learner during the development of skills
- (c) Review of topic areas of identified uncertainty to re-establish the knowledge
- (d) Full re-training (only where it is evident the employee would benefit)
- (e) Other suitable and agreed interventions to best aid the employee to return to the operational duties competent and confident.

Or a mix of the above until such time as competence and confidence are established.

**Note:** IOSA effective Sep 2021: Recurrent training on a frequency in accordance with requirements of the regulatory authority but not less than once during every 36-month period, except for recurrent training in dangerous goods as specified in [GRH 2.2.1](#) or [GRH 2.2.2](#).

# Guidance Material (GM)

- **GM1 ORGH.TRG.100(a):**
  - ❑ Ensures temporary and agency staff are included. Maintains the training requirement intended to deliver improved safety in aviation.
- **GM2 ORGH.TRG.100**
  - ❑ Gives clear guidance on the types of training to accommodate all organizations.
- **GM3 ORGH.TRG.100**
  - ❑ Guidance for establishing a CBTA program in line with ICAO Doc 9868 PANS-TRG
- **GM4 ORGH.TRG.100**
  - ❑ Assessment program guidance
- **GM5 ORGH.TRG.100**
  - ❑ On the job training and coaching, a “gap” closed.
- **GM6 ORGH.TRG.100**
  - ❑ Introduces concept of “error free learning”

# Ground Support Equipment (ORGH.GSE)

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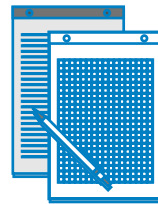
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# Content of draft ORGH.GSE



- Ground support equipment
- GSE maintenance programme

→ *Question: What would you like to add to the GSE requirements?*



# SMS – Interfaces

- An event occurring to a user at an aerodrome affects all users of that aerodrome.
- Participation of GHSP in safety programmes of the aerodrome operator (ORGH.MGMT.225).
  - The GHSP is not required to have an individual Safety Programme
- Establish clear responsibilities of actors involved in common procedures
  - ICAO Doc 10121 – examples of interface recognition – inserted in the draft rules





# SMS – safety culture

- Occurrence reporting is mandatory through existing regulations ((EU) 376/2014, 2015/1018). However:
  - Regulating it is no guarantee for good reporting or any reporting at all
- Understanding one's role in keeping operation safe facilitates building a safety culture and a reporting culture
  - AMC and GM on SMS and safety reporting (ORGH.MGMT.200; 230)
  - Examples of good practices in safety culture
- New rule proposes analysis of reports together with air operator and aerodrome operator to improve safety in a holistic approach
- *Question: Can you provide your own example of how to implement and maintain a safety culture?*



Open  
Slido  
Poll

# Safety culture presentation

- Does safety culture help GH companies and their staff?
  - Presentation by Barry Kirwan, Eurocontrol

Send your comments to  
**[ground-handling@easa.europa.eu](mailto:ground-handling@easa.europa.eu)**

Disclaimer:

This presentation refers to the draft EU GH Regulation published for consultation purpose of this webinar.  
The content of the presentation may not be valid for the final version of the EU GH Regulation.

[easa.europa.eu/connect](https://easa.europa.eu/connect)



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An Agency of the European Union 

# Additional slide for clarification

# Oversight of GH Services and Providers



- GHSP providing services at an aerodrome under BR are covered by the GH Regulation.
- GHSP providing services to an EU air operator **at non-EU aerodromes** will continue to work **under the management system of the aircraft operator** (Contracted services, ORO.GEN.205) – no changes
- Contracted services or self-handling by air operators performed **outside an aerodrome**:
  - Reg. (EU) 965/2012 applies; for example: load planning, mass&balance calculations, issuance of load control documents. **HOWEVER:** aircraft loading/unloading, loading supervision will be subject to direct oversight by the competent authority of the aerodrome.
  - Indirect oversight by the aircraft operator's competent authority.
- National rules apply to oversight of GHSP at EU aerodromes outside the Basic Regulation scope or exempted from the Basic Regulation.