

Draft AMC and GM to the GH Regulation

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AMC and GM to the Articles of the GH Regulation

GM1 to Article 1 Subject matter

PROVISION OF GROUND HANDLING SERVICES FROM A REMOTE LOCATION

Organisations providing ground handling (GH) services from a location other than an aerodrome subject to Regulation (EU) 2018/1139 and its delegated and implemented acts are not subject to this Regulation. The services provided by such organisations are included under the management system of the aircraft operator as contracted activities and are regulated by Regulation (EU) No 965/2012, particularly point ORO.GEN.205 thereof.

Examples of such services:

- Passenger and baggage acceptance,
- Load control (load planning and related document production).

GM1 Article 2(1) Scope

GROUND HANDLING ORGANISATION

- (a) GH services may be provided by different types of organisations. When the terms 'organisation providing GH services', 'ground handling service provider (GHSP)' or 'GH organisation' are used in the GH Regulation and the associated AMC and GM, they are understood to cover all organisations identified in Article 2(1) unless it is clearly specified otherwise in the rule.
- (b) A GH organisation that is contracted by another GH organisation to perform any GH activity as listed in Article 2(2) is considered a GH organisation and therefore subject to the GH Regulation.
- (c) A freight forwarder is not considered a GHSP. Freight forwarding is not included in the definition of ground handling services of Regulation (EU) 2018/1139. If a freight forwarder provides a GH service listed in Article 2(2) of the GH Regulation, then the requirements on contracted activities will apply, either under Regulation (EU) 965/2012 (ORO.GEN.205) when its services are contracted directly by an aircraft operator or under the GH Regulation (ORGH.MGM.205) when its services are contracted directly by a GH organisation.
- (d) If an aircraft operator provides GH services to other aircraft operators that are not part of its single air carrier business grouping, this is not considered self-handling. In such case, the provision of GH services is subject to compliance with the GH Regulation and the organisation is bound to declare its GH activities in accordance with this Regulation.

GM2 Article 2(1) Scope

SINGLE GROUND HANDLING ORGANISATION BUSINESS GROUPING

This concept is used in the GH Regulation for situations when a GH organisation has several branches that may be registered in more than one Member State, but which belong to the same parent-company. In such cases, it is necessary to distinguish that such organisations should be regarded as part of a single business grouping and should have a single principal place of business – the one where the parent-company is located. The use of this concept serves several purposes:

- (a) to avoid a duplication of GH requirements for the same organisation,

- (b) to avoid multiple oversight audits and inspections with the same scope – the organisation’s management system – and to enable an effective and efficient cooperative oversight, and
- (c) to enable such organisations to identify to which competent authority they should submit a declaration.

GM3 Article 2(1) Scope

SINGLE AIR CARRIER BUSINESS GROUPING

- (a) A ‘**single air carrier business grouping**’ refers to two or more aircraft operators that are AOC holders having their principal place of business in territories to which the Treaties apply, which facilitate the harmonisation of their management systems, operations and other processes for the purpose of applying the requirements for self-handling. This includes applying the same policies, processes and procedures to components of their management system addressing ground handling, training of personnel performing GH activities, ground operations procedures, and the maintenance programme for ground support equipment.
- (b) This concept is used in the GH Regulation for situations when an aircraft operator provides self-handling services not only to itself but also to other aircraft operators that are part of the same business group. The use of this concept serves several purposes:
 - (1) to avoid a duplication of GH requirements,
 - (2) to enable such organisations to identify to which competent authority they should submit a declaration and
 - (3) for oversight and cooperative oversight purposes.

GM4 Article 2(1) Scope

AIRCRAFT OPERATORS PROVIDING GH SERVICES

- (a) The term ‘aircraft operator’, when used in relation to self-handling, should be understood as an aircraft operator that may or may not be part of a single aircraft operator business group unless specified otherwise.
- (b) An aircraft operator providing GH services to other aircraft operators that are not part of the same single air carrier business grouping is considered to be a GH organisation as identified in point 1(a) of Article 2.

GM5 Article 2(1) Scope

AERODROME OPERATOR PROVIDING FACILITIES AND INFRASTRUCTURE OUTSIDE THE SCOPE

- (a) An aerodrome operator may provide certain centralised infrastructure or equipment for the provision of GH services such as, for example, a centralised baggage sorting infrastructure or de-icing facilities.
- (b) When the aerodrome operator only provides such equipment or facilities, but its personnel are not involved in their operation, it does not fall in the scope of the GH Regulation.
- (c) When the aerodrome operator’s own personnel are also involved in the operation of those facilities or infrastructure, then the aerodrome operator is considered a GH organisation and subject to compliance with the GH Regulation.

GM1 Article 2(2) Scope

PASSENGER HANDLING

Passenger handling services containing safety aspects in the scope of this regulation are the following:

- (a) dangerous goods in passenger baggage or on the person upon acceptance at check-in at the aerodrome;
- (b) inserting correct information related to passenger and baggage acceptance into the departure control system, for load control purposes (i.e., mass and balance calculations and load planning);
- (c) ground transportation between the airport terminal and the aircraft;
- (d) safety of passengers on the apron and around the aircraft during boarding and disembarkation;
- (e) passenger boarding and disembarkation using ground support equipment, including passenger boarding bridges.

PROVISION OF GH SERVICES TO PASSENGERS WITH REDUCED MOBILITY (PRM)

- (f) If the aerodrome operator provides PRM services with its own personnel, it is exempted from compliance with the GH Regulation. It is considered that compliance with Regulation (EU) 139/2014 and with Regulation (EC) No 1107/2006 is deemed sufficient to ensure compliance with the GH Regulation.

GM2 Article 2(2) Scope

GROUND SUPPORT EQUIPMENT (GSE)

The following is a list of GSE in the scope of this Regulation. The list is based on IATA AHM:

- (a) *Lifting and elevating equipment:*
 - (1) aircraft tail stand
 - (2) belt loader, with or without in-hold conveyor system
 - (3) catering vehicle
 - (4) aircraft exterior cleaning equipment
 - (5) de-icing/anti-icing vehicle/equipment
 - (6) elevating work platform or equipment
 - (7) forklift
 - (8) loader – lower deck or main deck
 - (9) maintenance stairs
 - (10) mobile passenger boarding ramps
 - (11) passenger stairs
 - (12) passenger boarding bridge (PBB)
 - (13) boarding vehicle for passengers with reduced mobility
- (b) *Servicing equipment*
 - (14) aircraft air conditioning unit (ACU)

- (15) aircraft fuelling dispenser (pump)
- (16) aircraft fuelling truck or cart
- (17) aircraft heating unit
- (18) aircraft start unit (ASU)
- (19) ground power unit (GPU)
- (20) lavatory service equipment
- (21) potable water service equipment
- (c) *Towing equipment, including remote controlled vehicles*
 - (22) tractor for baggage, cargo or aircraft equipment
 - (23) aircraft towing or pushback vehicle: tractor, tug, truck
 - (24) towbar
 - (25) towbarless tractor
 - (26) interchangeable tow bar heads
- (d) *Transporting equipment*
 - (27) bus (for passengers or crews)
 - (28) car, van, pick-up truck
 - (29) cart, dolly (for baggage, cargo, ULD, aircraft equipment)
 - (30) fuelling truck
 - (31) temperature controlled cargo dolly
 - (32) temperature controlled cargo truck
 - (33) trailer (for baggage, cargo, ULD, aircraft equipment)
 - (34) truck (for baggage, cargo, ULD, aircraft equipment)
 - (35) ULD transporter (to move ULD to/from high loaders)
- (e) *Other equipment used for the provision of GH services*
 - (36) aircraft chocks
 - (37) aircraft cones
 - (38) retractable stanchions, passenger guiding systems and component parts thereof.

GM3 Article 2(2) Scope

ACTIVITIES UPON AIRCRAFT ARRIVAL

These activities take place before an aircraft is parked at the stand and after the aircraft has been parked:

- (a) Prior to aircraft arrival:
 - (1) checking the aircraft stand for any foreign object debris (FOD);
 - (2) checking the conditions of the surface stand for any ice, snow, etc.;
 - (3) preparation of the necessary GSE, chocks and cones outside the equipment restraint area;

- (4) ensure the necessary personnel are available for aircraft arrival activities and remain outside the aircraft manoeuvring path and within the safety zones.
- (b) After the aircraft has been parked:
- (1) aircraft securing on the ground by putting chocks on the aircraft wheels and safety cones to mark the equipment restraint area;
 - (2) walkaround upon aircraft arrival to inspect the aircraft fuselage, doors, engine cowlings/propellers for any damage;
 - (3) give clearance for positioning of the necessary ground support equipment (GSE) (air conditioning unit, ground power unit, passenger stairs or boarding bridges, etc.).

GM4 Article 2(2) Scope

ACTIVITIES UPON AIRCRAFT DEPARTURE

These activities include, but are not limited to:

- (a) removal of the passenger boarding bridge and any other external equipment and vehicles from the aircraft and the equipment restraint area (ERA),
- (b) verification that aircraft doors and panels are properly closed,
- (c) aircraft walk around,
- (d) FOD check,
- (e) ensure availability of towing/pushback equipment,
- (f) ensure all persons and equipment are outside the aircraft danger areas,
- (f) any other activity necessary in accordance with the GH organisation procedures and local aerodrome operator procedures.

GM5 Article 2(2) Scope

CARGO AND MAIL HANDLING IN A CARGO WAREHOUSE

- (a) Cargo handling is a complex activity that involves different entities responsible for different segments of cargo preparation and transportation. Not all those entities are included in the scope of the GH Regulation. For example, the following entities are excluded from the scope of the GH Regulation:
 - (1) Organisations that do not perform activities listed in Article 2(2) of the GH Regulation at the premises of an aerodrome within the scope of Regulation (EU) 2018/1139;
 - (2) Organisations like freight forwarders or shippers;
 - (3) Organisations that only transport cargo on the ground from one location/warehouse to another before being checked for acceptance for air transport .
- (b) The GH activities related to cargo and mail handling usually occur in a cargo warehouse. Similar to the entities involved in the cargo transportation chain, not all cargo warehouses are included in the scope of the GH Regulation.
- (c) Only the cargo warehouses located on an aerodrome or adjacent to it and which are responsible for final cargo checks and acceptance before the cargo is loaded on the aircraft are included in the scope of the GH Regulation.

- (d) Furthermore, only the safety-related activities occurring in a cargo warehouse which may have an impact on the safety of the flight are included in the scope of the GH Regulation.

GM6 Article 2(2) Scope

GROUND SUPERVISION

- (a) Ground supervision of GH activities is a service in itself, which may be contracted by an aircraft operator as an individual service. It comprises of activities to supervise one or more GH activities, which may be performed by one or more providers of GH services.
- (b) Ground supervision does not include the GH organisation's self-management of its own activities.
- (c) The person responsible for the ground supervision may act on behalf of more than one aircraft operator to ensure safe delivery of services by the ground handling organisations.
- (d) The ground supervision function includes general activities, such as official representation of the contracting aircraft operator(s) in relation to the aerodrome authorities or any other organisations operating at that aerodrome, as well as supervision of activities taking place before, during and after turnaround, including:
- (1) Operational planning,
 - (2) Load control, messaging and telecommunications,
 - (2) Coordination of airside activities,
 - (3) Activities related to aircraft arrival, vehicles and GSE operations and parking,
 - (4) Passenger and baggage handling,
 - (5) Catering handling on the apron,
 - (6) Departure activities,
 - (7) Apron services, aircraft cleaning, refuelling/defueling operations, toilet/water services,
 - (8) Handling, storage, administration of unit load devices,
 - (9) Safety and service performance monitoring,
 - (10) Workload management,
 - (11) Decision making,
 - (12) Emergency response,
 - (13) Any other activities requested by the aircraft operator.

GM1 Article 2(3) Scope

FLIGHT DISPATCH

Although the term 'flight dispatch' is included in the definition of 'ground handling' of Regulation (EU) 2018/1139, the GH Regulation does not regulate those activities or their providers for the following reasons:

- (a) The flight dispatch function is organically linked to the operational control system of an aircraft operator, even performed as an outsourced service, and therefore considered a flight

operations function, which is covered by Regulation (EU) 965/2012 on air operations and associated AMC and GM.

- (b) The term 'flight dispatch' may be associated with the term 'flight dispatcher', which is a term defined in Regulation (EU) 965/2012 on air operations and ICAO Annex 6 for air operations as an individual having a specific qualification and training compliant with ICAO Annex 1, who engages in the control and supervision of flight operations, who supports, briefs or assists the pilot-in-command in the safe conduct of the flight. The flight dispatcher function is considered a typical 'flight ops' function, with little to no connection to ground handling activities. 'Typical' flight dispatcher tasks are, for example, to evaluate all safety related information for a flight, including NOTAMS, to prepare the operational flight plan and the ATS flight plans, to calculate the necessary amount fuel for a flight, to identify the alternate aerodromes, to consider the flight route restrictions and aircraft performance limitations for each individual flight, to communicate safety relevant information to the pilots during flight, etc.
- (c) Differently from the air operations domain, in ground handling, a 'flight dispatcher' is a person that 'dispatches a flight' after all GH activities have been completed and, from the GH point of view, the aircraft is ready to depart. Industry uses also other terms for this GH function: 'turnaround coordinator', 'ramp coordinator', 'ramp supervision', or simply 'dispatcher'.
- (d) However, the confusion generated by the use of the same term with a double meaning may persist, as one may associate the term 'flight dispatch' only with tasks in the domain with which they are more familiarised or where they work – which is either air operations or ground operations, rarely both; sometimes one may forget or may not even be aware of the other meaning or the tasks associated to it. This might have potential safety implications due to the numerous interfaces between air operations and ground handling for ground operational procedures.
- (e) To avoid the confusion described above, it is recommended that GH organisations avoid using the terms 'flight dispatch' or 'flight dispatcher' when prescribing typical ground handling tasks to prepare an aircraft for departure, and replace it with another term, such as 'ground dispatch', 'ramp supervision' or 'turnaround coordination' for the function, or 'ground dispatcher', 'ramp supervisor' or 'turnaround coordinator' for the person.

GM2 Article 2(3) Scope

LOAD PLANNING, MASS AND BALANCE CALCULATIONS, LOAD CONTROL (LC) MESSAGES AND COMMUNICATIONS, AND ISSUANCE OF MASS AND BALANCE DOCUMENTS

- (a) The scope of the GH Regulation does not cover the provision of load planning services, mass and balance calculations, LC messaging and communications, and issuance of related documents. These activities are included in the scope of Regulation (EU) 965/2012 on air operations. When outsourced to a third-party provider, the responsibility for the safety of these services is covered by ORO.GEN.205 'Contracted activities'.
- (b) Similar to the operational control system of the aircraft operator, the load control function is specific to the operator's fleet and operational context. It can be performed by a GH organisation at an aerodrome, as part of the GH service offer available at that aerodrome, or it can be done by the aircraft operator itself, either by its own personnel or outsourced to an external service provider that is not located at an aerodrome.
- (c) To simplify the responsibilities and oversight of all the load control activities, the load control process is classified into two distinct phases:

- (1) Phase 1: mass and balance (M&B) calculations, load planning, communications and messaging, and issuance of load control (LC) documents (loadsheets, LIR, NOTOC when necessary). These activities can be executed from almost anywhere in the world. This phase includes tasks that require only a computer and an internet connection and can be performed anywhere in the world; and
 - (2) Phase 2: aircraft unloading and loading of cargo, mail, and baggage, and loading supervision, verification against the loading instructions, and communication of any last-minute changes to the mass and balance documentation . This phase takes place at an aerodrome, at the aircraft.
- (d) The aircraft operator is responsible for the compliance of activities included in phase 1, i.e., M&B calculations, load planning, communications and messaging, and issuance of LC documents with the relevant requirements of Regulation (EU) 965/2012. This applies at all times, both when the tasks of phase 1 are performed by the aircraft operator itself (as self-handling) and when they are outsourced as a contracted activity. This phase is verified indirectly by the competent authority of the aircraft operator during the oversight of the aircraft operator.
- (e) The GH organisation is responsible for the activities included in phase 2: unloading and loading of the aircraft and the loading supervision – which take place at an aircraft, at the aerodrome. These activities will be directly overseen by the competent authority of the aerodrome where they are performed.

GM3 Article 2(3) Scope

OIL HANDLING

- (a) Aircraft oil handling means replenishing of oil at the aircraft. Like any other activity related to aircraft maintenance, is subject to Regulation (EU) 1321/2014 on continuing airworthiness as a maintenance task and therefore exempted from the GH Regulation. Oil handling is performed by personnel of a maintenance organisation approved under Regulation (EU) 1321/2014 or compliant with the ICAO Annex 8 Maintenance of Aircraft, when this activity is performed to third-country aircraft by organisations that are not subject to Regulation (EU) 1321/2014,. This task may also be performed by the flight crew for those aircraft for which oil handling is mentioned in the Aircraft Flight Manual, as part of the pre-flight inspection as indicated in AMC M.A.301(a) points 2 and 3 of the above-mentioned regulation.
- (b) This service can be performed either by the aircraft operator personnel or by a contracted third-party provider that holds an approval in accordance with the requirements mentioned above.

ANNEX I

Definitions of terms used in Annexes II to IV (Part-DEF)

GM1 GH.DEF.100 Definitions

DEFINITIONS OF TERMS

For the purpose of this Regulation and its associated AMC and GM, the following definitions apply:

<i>Assessment</i>	<p>In the context of management system performance monitoring, continuous improvement, and oversight, it refers to a planned and documented activity that is performed by competent personnel to evaluate and analyse the achieved level of performance and maturity in relation to the organisation's policy and objectives.</p> <p>Note: an assessment focuses on desirable outcomes and the overall performance, looking at the organisation as a whole. The main objective of the assessment is to identify the strengths and weaknesses to drive continual improvement.</p>
<i>Correction</i>	the action to eliminate a non-compliance
<i>Corrective action</i>	the action to eliminate or mitigate the root cause(s) and prevent the recurrence of existing detected non-compliance, or of any other undesirable condition or situation. Proper determination of the root cause(s) is crucial for defining effective corrective action to prevent reoccurrence.
<i>Mass and balance documentation</i>	<p>documents containing data about the aircraft mass and balance, centre of gravity, aircraft load, notification to Captain (NOTOC) for dangerous goods, loading instructions, load information.</p> <p>Since aircraft operators may use different names for the various documents containing mass and balance calculations and data, the more generic term 'mass and balance documentation' is used throughout the GH Regulation. This is done also to ensure alignment with the terms used in Regulation (EU) 965/2012 for mass and balance calculations and related documentation.</p>
<i>Near miss</i>	an event in which an occurrence to be mandatorily reported according to Regulation (EU) No 376/2014 was narrowly averted or avoided.
<i>Oversight planning cycle</i>	the time frame within which the areas of the approval and the processes that are identified through a risk assessment should be reviewed by the competent authority by means of audits and inspections.
<i>Oversight programme</i>	the detailed oversight schedule that defines the number of audits and other activities, including the scope and duration of each activity, as well as the details of product audits and locations, as appropriate, to be performed by the

	competent authority, and to the tentative time frame for performing each activity.
<i>Preventive action</i>	the action to eliminate the cause of potential non-compliance, or any other undesirable potential situation

GM1 GH.DEF.100 Definitions

AIRCRAFT GROUND DE-ICING AND ANTI-ICING

ICAO DOC 9640 provides the following definitions for anti-icing, de-icing and de-icing/anti-icing:

‘Anti-icing’ is a precautionary procedure by which clean aircraft surfaces are protected against the formation of ice and frost and the accumulation of snow and slush for a limited period of time.

‘De-icing’ is the process that removes ice, snow, slush or frost from aircraft surfaces.

‘De-icing/anti-icing’ is a procedure combining both the de-icing process and the anti-icing process and that can be performed in one or two steps:

‘One-step de-icing/anti-icing’: heated anti-icing fluid is used to de-ice the aircraft and remains on the surfaces to provide anti-icing capability.

‘Two-step de-icing/anti-icing’: This procedure contains two distinct steps. The first step, de-icing, is followed by the second step, anti-icing, as a separate fluid application.

ANNEX II

AUTHORITY REQUIREMENTS GROUND HANDLING (PART-ARGH)

SUBPART GEN – GENERAL REQUIREMENTS

AMC1 ARGH.GEN.100 Competent authority

COMPETENT AUTHORITY RESPONSIBLE FOR RECEIVING DECLARATIONS

- (a) The competent authority should make publicly available any contact information on the competent authority responsible to receive declarations.
- (b) The competent authority receiving a declaration from a single ground handling organisation business grouping or a self-handling aircraft operator that has its principal place of business in a Member State and provides ground handling services in more than one Member State should ensure that all the other competent authorities have received that declaration.

GM1 ARGH.GEN.115 Oversight documentation

AVAILABILITY OF DOCUMENTATION

- (a) Legislative acts, standards, rules, technical publications, guidelines, and other similar documents are made available, in a timely manner, to GH organisations in various ways and formats, such as via websites, the respective government's official gazette, or any other means.
- (b) The way to make such material available, including the possible application of fees, is for the competent authority to decide.
- (c) Making such documentation available is without prejudice to the application of rules regarding protection of intellectual property rights, or similar applicable legislation.

GM1 ARGH.GEN.120 Means of compliance

USE OF THE SAME ALTERNATIVE MEANS OF COMPLIANCE

Alternative means of compliance used by a competent authority or by a GH organisation under its oversight may be used by other competent authorities or GH organisation only if processed again in accordance with ARGH.GEN.120 (d) and (e).

AMC1 ARGH.GEN.120(e) Means of compliance

DEMONSTRATION OF COMPLIANCE

In order to demonstrate that the implementing rules are met, a safety risk assessment of the proposed alternative means of compliance (AltMoC) should be completed and documented. The result of the risk assessment of the AltMoC should demonstrate an equivalent level of safety to that established by the AMC adopted by the Agency.

AMC1 ARGH.GEN.125(b) Information to the Agency

EXCHANGE OF SAFETY-SIGNIFICANT INFORMATION WITH THE AGENCY

Each competent authority should appoint a coordinator to act as the contact point for the exchange of safety-significant information between the competent authority and the Agency. This function may be assigned within the competent authority to a person or a group of persons already performing such tasks in other aviation domains.

GM1 ARGH.GEN.125(b) Information to the Agency

MEANING OF 'SAFETY-SIGNIFICANT INFORMATION STEMMING FROM OCCURRENCE REPORTS'

'Safety-significant information stemming from occurrence reports' means a conclusive safety analysis that summarises individual occurrence data and provides an in-depth analysis of a safety issue, and which may be relevant for the Agency's safety action planning.

GM2 ARGH.GEN.125(b) Information to the Agency

RECOMMENDED CONTENT FOR CONCLUSIVE SAFETY ANALYSES

A conclusive safety analysis should contain the following elements:

- (a) a detailed description of the safety issue, including the scenario in which the safety issue takes place;
- (b) an indication of the stakeholders affected by the safety issue, including types of operations and organisations;

and, as appropriate:

- (c) a risk assessment establishing the severity and probability of all the possible consequences of the safety issue;
- (d) information about the existing safety barriers that the aviation system has in place to prevent the likely consequences of the safety issues from occurring or to reduce those consequences;
- (e) any mitigating actions already in place or developed to address the safety issue;
- (f) recommendations for future actions to control the risk; and
- (g) any other element that the competent authority considers essential for the Agency to properly assess the safety issue.

AMC1 ARGH.GEN.135(e) Immediate reaction to a safety problem

INFORMATION TO THE AIRCRAFT OPERATORS CONCERNED

The competent authority should advise the GH organisation to inform immediately the aircraft operators to which it provides services and are affected by the safety problem of the implementation of the safety measures mandated by the competent authority or EASA.

SUBPART MGM – MANAGEMENT

AMC1 ARGH.MGM.200 Management system

ORGANISATIONAL STRUCTURE

- (a) The competent authority should consider all the following elements when deciding on the required organisational structure for ground handling oversight:
 - (1) the number of declared GH organisation, including self-handling;
 - (2) the number of aerodromes where the GH organisation are operating;
 - (3) the possible use of qualified entities and the resources needed to fulfil the continuing oversight obligations;
 - (4) the size of the Member State's aviation industry;
 - (5) the economic trends indicating growth or decline of ground handling activities.
- (b) The setup of the organisational structure should ensure that the various tasks and obligations of the competent authority do not rely solely on individuals. A continuous and undisturbed fulfilment of these tasks and obligations of the competent authority should also be guaranteed in case of illness, accident or leave of individual employees.

GM1 ARGH.MGM.200 Management system

GENERAL

- (a) It is recommended that the competent authority is organised in such a way that:
 - (1) there is specific and effective management authority in the conduct of all relevant activities;
 - (2) the functions and processes described in the applicable requirements of Regulation (EU) 2018/1139 and its implementing and delegated acts, AMC and GM may be properly implemented;
 - (3) the competent authority's organisation and operating procedures for the implementation of the applicable requirements of Regulation (EU) 2018/1139 and its implementing and delegated acts are properly documented and applied;
 - (4) all competent authority personnel involved in the related activities are provided with training where necessary;
 - (5) specific and effective provision is made for the communication and interface, as necessary, with the Agency and the competent authorities of other Member States; and
 - (6) all functions related to implementing the applicable requirements are adequately described.
- (b) A general policy on activities related to the applicable requirements of Regulation (EU) 2018/1139 and its implementing and delegated acts should be developed, promoted and implemented by the manager at the highest appropriate level; for example, the manager at the top of the functional area of the competent authority that is responsible for such activities.

- (c) Appropriate steps should be taken to ensure that the policy is known and understood by all personnel involved, and all necessary steps should be taken to implement and maintain the policy.
- (d) The general policy, while also satisfying additional national regulatory responsibilities, should take into account in particular:
 - (1) the provisions of Regulation (EU) 2018/1139;
 - (2) the provisions of the applicable implementing and delegated acts and their AMC and GM;
 - (3) the needs of industry; and
 - (4) the needs of the Agency and of the competent authority.
- (e) The policy should define specific objectives for key elements of the organisation and processes for implementing related activities, including the corresponding control procedures and the measurement of the achieved standard.

AMC1 ARGH.MGM.200(a)(1) Management system

DOCUMENTED POLICIES AND PROCEDURES

- (a) The various elements of the organisation involved with the activities related to Regulation (EU) 2018/1139 and its implementing and delegated acts should be documented in order to establish a reference source for the establishment and maintenance of this organisation.
- (b) The documented policies and procedures should be established in a way that facilitates their use. They should be clearly identified, kept up-to-date and made readily available to all personnel involved in the related activities.
- (c) The documented policies and procedures should cover, as a minimum, the following aspects:
 - (1) policy and objectives;
 - (2) organisational structure;
 - (3) responsibilities and associated authority;
 - (4) procedures and processes;
 - (5) internal and external interfaces;
 - (6) internal control procedures;
 - (7) training of personnel;
 - (8) cross-references to associated documents;
 - (9) assistance from other competent authorities or the Agency, where required;
 - (10) ethics, personal conduct and the avoidance of actual or perceived conflicts of interest in the performance of official duties.
- (d) If the information is held in more than one document or series of documents, suitable cross-referencing should be provided, and the referenced documentation should be readily available upon request.

GM1 ARGH.MGM.200(a)(1) Management system

DOCUMENTED POLICIES AND PROCEDURES

The following is an example of information that is held in more than one document or series of documents: organisational structure and job descriptions are not usually in the same documentation as the detailed working procedures. In such cases, it is recommended that the documented procedures include an index of cross-references to all such other related information.

AMC2 ARGH.MGM.200(a)(1) Management system

CONTENT OF PROCEDURES

- (a) The procedures in the competent authority's management system should provide at least the following information:
- (1) regarding continuing oversight functions undertaken by the competent authority, the competent authority's organisational structure with description of the main processes. This information should demonstrate the allocation of responsibilities within the competent authority, and that the competent authority is capable of carrying out the full range of tasks regarding the size and complexity of the Member State's ground handling industry. It should also consider overall proficiency and authorisation scope of competent authority personnel;
 - (2) how changes that significantly affect the competent authority's oversight capabilities are identified and dealt with;
 - (3) for personnel involved in oversight activities, the minimum professional qualification requirements and experience, and principles guiding appointment (e.g., assessment);
 - (4) how the following activities are carried out: verification of declarations, performance of continuing oversight, follow-up of findings and observations, enforcement measures, and resolution of safety concerns;
 - (5) principles of managing exemptions and derogations;
 - (6) systems used to disseminate applicable safety information for timely reaction to a safety problem;
 - (7) criteria for planning continuing oversight (oversight programme), including adequate management of interfaces when conducting continuing oversight (aerodrome operations and air operations, or ramp inspections); and
 - (8) outline of the initial training of newly recruited oversight personnel (taking future activities into account), and the basic framework for continuation training of oversight personnel.
- (b) The procedures in the competent authority's management system should include any amendments to those procedures.

AMC3 ARGH.MGM.200(a)(1) Management system

PROCEDURES AVAILABLE TO THE AGENCY

- (a) Copies of the procedures related to the competent authority's management system and their amendments to be made available to the Agency for the purpose of standardisation before an inspection should provide at least the following information:
- (1) Regarding continuing oversight functions undertaken by the competent authority, the competent authority's organisational structure with description of the main processes. This information should demonstrate the allocation of responsibilities within the competent authority, and that the competent authority is capable of carrying out the full range of tasks regarding the size and complexity of the Member State's aviation industry. It should also consider overall proficiency and authorisation scope of competent authority personnel.
 - (2) For personnel involved in oversight activities, the minimum professional qualification requirements and experience and principles guiding appointment (e.g., assessment).
 - (3) How the following are carried out: performance of continuing oversight, follow-up of findings, enforcement measures and resolution of safety concerns.
 - (4) Principles of managing exemptions and derogations.
 - (5) Processes in place to disseminate applicable safety information for timely reaction to a safety problem.
 - (6) Criteria for planning continuing oversight (oversight programme), including adequate management of interfaces when conducting continuing oversight (air operations, aerodrome operations, ramp inspections for example).
 - (7) Outline of the initial training of newly recruited oversight personnel (taking future activities into account), and the basic framework for continuation training of oversight personnel.
- (b) As part of the continuous monitoring of a competent authority, the Agency may request details of the working methods used, in addition to the copy of the procedures of the competent authority's management system (and amendments). These additional details are the procedures and related guidance material describing working methods for competent authority personnel conducting oversight.
- (c) Information related to the competent authority's management system may be submitted in electronic format.

AMC1 ARGH.MGM.200(a)(2) Management system

PREREQUISITES FOR GH INSPECTORS

- (a) The persons appointed as GH inspectors, having tasks related to oversight of GH organisations, should meet the following criteria:
- (1) have operational experience in GH operations appropriate to the assigned tasks, as established by the competent authority; or
 - (2) have auditing experience in another aviation domain, which is relevant for the oversight of GH activities and organisations performing them.

- (b) The competent authority should have a process to enable recognition of an inspector's previous qualifications and experience when relevant to their future tasks, so that only necessary additional training may be applied.

AMC2 ARGH.MGM.200(a)(2) Management system

TRAINING AND PROVISION OF TRAINING

- (c) The competent authority should establish a training and assessment programme for its ground handling inspectors and a plan for its implementation.
- (d) The training programme should cover the knowledge, skills and attitude components and should address specific needs of the personnel and the competent authority.
- (e) For each inspector, the competent authority should:
- (1) define the competencies required to perform the oversight tasks;
 - (2) perform a training needs assessment before enrolling the inspector in the training programme. This step should ensure easy recognition of any prior experience relevant for the function;
 - (3) establish initial and recurrent training programmes in order to maintain and to enhance inspector competency at the level necessary to perform the allocated tasks; and
 - (4) ensure that the training meets the established objectives and is reviewed and updated whenever necessary.
- (f) The training may be provided either by the competent authority's own qualified trainers or by another qualified training source, which may be a training organisation or adequately qualified individuals.
- (g) The trainers should meet the competency and qualification criteria established by the competent authority. Those criteria should include:
- (1) experience in GH operations for a minimum number of years as established by the competent authority;
 - (2) competent in applying training techniques,
 - (3) communication skills,
 - (4) safety awareness skills,
 - (5) behaviour traits indicating professionalism, maturity, judgment, integrity, and personal performance standards.

AMC3 ARGH.MGM.200(a)(2) Management system

INITIAL TRAINING FOR COMPETENT AUTHORITY INSPECTORS

- (a) Initial training should cover the knowledge, skills and attitude (KSA) components as follows:
- (1) The knowledge component should cover the content of AMC3 ARGH.MGMT.200(a)(2).
 - (2) The skills component should cover audit/inspection techniques in specific areas of inspection.
 - (3) The attitude component should be guided throughout the training process, by monitoring the trainee-inspector's behaviour and attitude during the assigned tasks and practical

exercises and by adjusting the behaviour through discussions and feedback of the instructor throughout the training process.

- (b) The competent authority should ensure that the trainee-inspectors have successfully completed the first phase of the initial training by passing an assessment with an appropriately qualified person.
- (c) On-the-job training

After having successfully passed the first phase of the initial KSA training, the trainee-inspector should undergo the on-the-job training component of the initial training. The objectives are the following:

 - (1) to familiarise the trainee-inspector with the particularities of performing a GH audit/inspection in a real, operational environment. It should be done in accordance with AMC4 ARGH.MGM.200(a)(2); and
 - (2) to monitor the knowledge, skills and attitude components in real-life environment and provide final feedback and guidance.
- (d) The competent authority may adapt the duration and depth of the individual training programme of an inspector if the required competence is achieved and maintained.
- (e) The completion of the two phases of initial training should be documented.

CONTENT OF THE INITIAL TRAINING FOR COMPETENT AUTHORITY INSPECTORS

- (f) The initial training programme for inspectors should include, as appropriate to their role, current knowledge, experience and skills, the following content, to cover the KSA components, as the case may be. The training programme should be updated, as needed, to reflect the latest changes in aviation legislation and industry:
- (g) *AVIATION LEGISLATION:*
 - (1) aviation legislation, organisation and structure;
 - (2) the relevant ICAO Annexes and documents;
 - (3) the relevant requirements of Regulation (EU) 2018/1139, its delegated and implementing acts and the related AMC and GM, as well as assessment methodology of the alternative means of compliance, and the applicable national legislation;
 - (4) this Regulation, as well as relevant parts of (EU) No 965/2012, (EU) No 139/2014, as well as other applicable requirements;
 - (5) enforcement measures as specified in Regulation (EU) 2018/1139 Article 62 points 1(e) and 9;
 - (6) Regulation (EU) No 376/2014 on the reporting, analysis and follow-up of occurrences in civil aviation and related Commission Implementing Regulation (EU) 2015/1018;
- (h) *AUDITING TECHNIQUES*
 - (1) auditing techniques. The training should cover theory of audits and inspections, as well as quality and safety assurance, including aspects of performing remote inspections.
 - (2) competent authority procedures relevant to the inspectors' tasks;
 - (3) acceptability and auditing of safety management systems;
 - (4) management of changes;
 - (5) human factors principles;

- (6) rights and obligations of inspecting personnel of the competent authority.
- (i) *TECHNICAL TRAINING PER GROUND HANDLING ACTIVITIES*
 - (1) technical training on specific GH activities as listed in Article 2 of the GH Regulation, appropriate to the role and tasks of the inspector;
 - (2) dangerous goods;
 - (3) operation of GSE, as applicable;
 - (4) security;
 - (5) other suitable technical training appropriate to the role and tasks of the inspector, including familiarisation with the applicable industry standards.
- (j) *SMS TRAINING*
Areas of particular interest that include, but are not limited to:
 - (1) management systems,
 - (2) assessment of the effectiveness of the safety management system, in particular hazard identification and risk assessment, safety assurance principles, root cause analysis;
 - (3) non-punitive reporting techniques in the context of the implementation of a 'just culture';
- (k) *AERODROME TRAINING*
 - (1) unescorted access to the movement area and other operational areas of the aerodrome that are relevant for the oversight of ground handling activities, in accordance with the training for competent authority inspectors included in Regulation (EU) 139/2014.

AMC4 ARGH.MGM.200(a)(2) Management system

ON-THE-JOB TRAINING FOR INSPECTOR QUALIFICATION

- (a) The competent authority should ensure that the on-the-job training is undertaken by trainee-inspectors as part of their initial training, after they have successfully completed the first phase of the initial KSA training. On-the-job training should be conducted with a competent person.
- (b) The content and duration of the on-the-job training should be adapted to the particular training needs of every trainee and should take into account the following aspects:
 - (1) the scope and complexity of the inspector's tasks,
 - (2) the application of the KSA concepts developed in the first phase of the initial training,
 - (3) any prior experience as an inspector.
- (c) The on-the-job training should focus on the oversight tasks that the inspector will perform. It should include a number of GH audits/inspections, which the competent authority may decide on a case-by-case basis, based on an evaluation of the trainee's performance.
- (d) The competent authority should confirm that the required competence has been achieved before an inspector is authorised to perform their role without supervision.
- (e) The scope and elements to be covered during the on-the-job training:
 - (1) Preparation of an audit/inspection:
 - (i) sources of information for the preparation of an audit/inspection;
 - (ii) areas of concern and/or open findings;

- (iii) selection of GH organisation to be audited/inspected; and
 - (iv) task allocation among the members of the audit/inspection team.
- (2) Administrative issues of the inspection:
- (i) GH inspector credentials, rights and obligations;
 - (ii) safety and security airside procedures; and
 - (iii) briefing on the GH inspector toolkit (fluorescent vest, anti-electrostatic clothing, checklists, digital camera, torch, safety shoes, hearing protection, etc. as the case may be).
- (3) Audit/inspection:
- (i) introduction – opening meeting;
 - (ii) on-site activities (audit/inspection according to the area of expertise);
 - (iii) findings (identification, categorisation, evidencing, reporting); and
 - (iv) corrective actions – enforcement.
- (4) Closing meeting – debriefing on the audit/inspection conclusions.
- (5) Preparation, completion and delivery of the audit/inspection report.
- (6) Human factor elements:
- (i) cultural aspects;
 - (ii) resolution of disagreements and conflicts; and
 - (iii) auditee stress.
- (7) Team leading, if required.
- (8) Post-audit/inspection procedures, such as monitoring the status of open audit findings, follow-up audits/inspections, and closing the findings after appropriate action has been taken by the GH organisation.

AMC5 ARGH.MGM.200(a)(2) Management system

QUALIFICATION OF INSPECTORS AFTER SUCCESSFUL COMPLETION OF INITIAL TRAINING

- (a) Upon successful completion of the initial training, including the on-the-job training phase, the competent authority should issue a formal qualification statement for each qualified GH inspector listing their privileges. The competent authority should also enable recognition of an inspector's previous qualifications in other aviation domains, to facilitate their work.
- (b) The competent authority should put in place a system that ensures that their inspectors meet at all times the qualification criteria for eligibility, training and recent experience.

AMC6 ARGH.MGM.200(a)(2) Management system

CONTINUED COMPETENCE OF INSPECTORS

- (a) Once an inspector is qualified, the competent authority should ensure that they remain competent to perform the allocated tasks. This should be done by developing and implementing

a recurrent training and assessment process. The recurrent training and assessment should take place at regular intervals, no longer than 36 months.

- (b) The recurrent training programme should address, as appropriate to their role, at least the following aspects:
 - (1) changes in aviation legislation, operational environment and technologies;
 - (2) competent authority procedures relevant to the inspector's tasks;
 - (3) technical training, including training on ground handling specific subjects, appropriate to the role and tasks of the inspector; and
 - (4) results from past oversight.
- (c) The training courses that have a fixed interval for recurrence established through another regulation should be maintained as such (e.g., dangerous goods training).
- (d) The maintenance of inspector's competence programme may include, whenever possible, a scheme that allows exchange of inspectors between Member States to enable the efficient implementation of cooperative oversight and build on the standardisation of the oversight process while increasing the required competencies.

GM1 ARGH.MGM.200(a)(2) Management system

PRACTICAL TRAINING VS ON-THE-JOB TRAINING

On-the-job training implies actual participation of the trainee-inspector in audits/inspections, either as an observer or as a team member under supervision.

GM2 ARGH.MGM.200(a)(2) Management system

DOCUMENTS RELEVANT FOR GH INSPECTOR TRAINING

The following non-exhaustive list of ICAO Annexes and Documents, as well as industry standards and industry best practices, as appropriate to the role of the GH inspector, are relevant for the initial training programme referred to in AMC3 ARGH.MGMT.200(a)(2):

- (a) *ICAO documentation:*
 - (1) Annex 6 Operation of Aircraft – relevant standards and recommended practices for GH
 - (2) Annex 14 Aerodromes – relevant standards and recommended practices for GH
 - (3) Annex 18 – The Safe Transport of Dangerous Goods by Air
 - (4) Annex 19 – Safety Management
 - (5) Doc 10121 – Manual on Ground Handling
 - (6) Doc 9284 – Technical Instructions for the Safe Transport of Dangerous Goods
 - (7) Doc 9640 – Manual of Aircraft Ground De-icing/Anti-icing Operations
 - (8) Doc 9977– Manual on Civil Aviation Jet Fuel Supply
 - (9) Doc 10070 – Manual on the Competencies of Civil Aviation Safety Inspectors
 - (10) Doc 10102 – Guidance for Safe Operations Involving Aeroplane Cargo Compartments

- (11) Doc 10147 – Guidance on a Competency-based Approach to Dangerous Goods Training and Assessment
- (12) Doc 10151 – Manual on Human Performance for Regulators
- (b) *Industry standards and best practices, as applicable:*
 - (13) Joint Inspection Group (JIG) standards related to fuelling operations
 - (14) Society of Automotive Engineers (SAE) standards related to de-icing and anti-icing operations
 - (15) IATA Ground Operations Manual (IGOM), Airport Handling Manual (AHM), Cargo Handling Manual (ICHM)
 - (15) EN standards for ground support equipment (EN 12312-1 to 20 and EN 1915-1 to 4)
 - (16) IBAC IS-BAH standards for ground handling for business aviation operations

GM3 ARGH.MGM.200(a)(2) Management system

QUALIFICATION OF INSPECTORS

- (a) The term ‘qualified’ denotes adequacy to the purpose. This may be achieved by fulfilling the necessary conditions, such as completing the required training, holding a diploma or degree, or gaining suitable experience. It also includes the ability, capacity, knowledge, or skills that suit an occasion or make a person eligible for a duty, office, position, privilege, or status.
- (b) Certain posts may, by nature, be associated with the possession of certain qualifications in a specific field (e.g., civil or mechanical engineering, safety management, chemistry, environment, etc.). In such cases, the person occupying such a post is expected to possess the necessary qualifications at a level that is in accordance with the applicable national or European Union legislation.

GM4 ARGH.MGM.200(a)(2) Management system

RECURRENT ASSESSMENT OF AN INSPECTOR’S COMPETENCE

It is recommended that the competent authority applies a recurrent assessment in the training process to ensure that an inspector’s continued competence is maintained.

- (a) The recurrent assessment consists of a knowledge-and-skills check during a real-time inspection or audit.
- (b) The inspector’s performance is evaluated against the objectives (usually the tasks associated to their job description) established for their role.
- (c) Deficiency against the expected outcome is addressed during a recurrent training session, to maintain the competence of the inspector at the expected level.
- (d) It is recommended to conduct recurrent assessments at intervals shorter than 36 months and to keep evidence of such assessment in the form of a checklist that contains the objectives referred to in point (b).

GM5 ARGH.MGM.200(a)(2) Management system

RECENT EXPERIENCE TO MAINTAIN QUALIFICATION OF GROUND HANDLING INSPECTORS

- (a) A GH inspector should be considered to remain qualified if they perform minimum 2 on-site GH audits/inspections or if they assist other competent authorities in performing minimum 2 GH audits/inspections during the previous 12 months.
- (b) If a GH inspector loses their qualification as a result of not meeting any of the conditions mentioned in point (a), they could be requalified by performing audits to complete the minimum number of audits/inspections under the supervision of a qualified inspector. The missed audits/inspections should take place within maximum 3 months after the deadline for completing the conditions in point (a).
- (c) If a GH inspector loses their qualification because they have not been engaged in performing audits/inspections for a period between 12 and 24 months, they should be re-qualified by the competent authority only after successfully completing the on-the-job-training and any recurrent training required.
- (d) If a GH inspector loses their qualification because they have not been engaged in performing audits/inspections for more than 24 months, they should be fully re-qualified by the competent authority only after successfully completing initial training, including on-the-job training.

GM6 ARGH.MGM.200(a)(2) Management system

SUFFICIENT PERSONNEL

- (a) This GM for the determination of the required personnel refers to the competent authority personnel required to fulfil the oversight and enforcement responsibilities.
- (b) The elements to be considered when determining the necessary personnel and planning their availability can be divided into quantitative and qualitative elements:
 - (1) Quantitative elements:
 - (i) the number of organisations responsible for the provision of ground handling services having declared their activity to the competent authority; and
 - (ii) the number of planned audits and inspections.
 - (2) Qualitative elements:
 - (i) the size, nature and complexity of activities of the organisations responsible for the provision of ground handling services, taking into account:
 - (A) use of industry standards;
 - (B) number of aerodromes where the GH organisation operates;
 - (C) number of personnel; and
 - (D) organisational structure, existence of subsidiaries and number of contracted activities;
 - (ii) the safety priorities identified;
 - (iii) the results of past oversight activities, including audits, inspections and reviews, in terms of risks and regulatory compliance, taking into account:
 - (A) number and level of findings;

- (B) timeframe for implementation of corrective actions; and
 - (C) maturity of management systems implemented by organisations and their ability to effectively manage safety risks, taking into account also information provided by other competent authorities related to activities in the territory of the Member States concerned; and
 - (iv) the size and complexity of the Member State's aviation industry and the potential growth of activities in the field of civil aviation, which may be an indication of the number of new declarations and changes to existing declarations to be expected.
- (c) The following data should be determined to assess the required number of GH inspectors and their planning:
- (1) standard number of audits to be performed to complete the full oversight scope;
 - (2) standard duration of an audit;
 - (3) standard working time for audit/inspection preparation, on-site audit, reporting and follow-up, per inspector;
 - (4) standard number of inspections and unannounced inspections to be performed;
 - (5) standard duration of inspections, including preparation, reporting and follow-up, per inspector;
 - (6) minimum number of inspectors and required qualification for each audit/inspection.
- (d) Standard working time could be expressed either in working hours per inspector or in working days per inspector. All planning calculations should then be based on the same unit (hours or working days).
- (e) It is recommended to use a spreadsheet application to process data defined under (c) and (d), to assist in determining the total number of working hours/days per oversight planning cycle required for oversight and enforcement activities. This application could also serve as a basis for implementing a system for planning the availability of personnel.
- (f) The following activities can be used to determine the number of working/hours/days per planning period for each qualified inspector:
- (1) purely administrative tasks not directly related to oversight;
 - (2) training;
 - (3) participation in other projects or tasks, such as oversight in other aviation domains;
 - (4) planned absence; and
 - (5) include a reserve for unplanned tasks or unforeseeable events.
- (g) Based on the elements listed above, the competent authority should be able to:
- (1) monitor dates when audits and inspections are due and when they have been carried out;
 - (2) implement a system to plan the availability of personnel; and
 - (3) identify possible gaps between the number and qualification of personnel and the required volume of oversight activities.

GM1 ARGH.MGM.200(a)(3) Management system

FACILITIES AND OFFICE ACCOMMODATION

Facilities and office accommodation include but are not limited to:

- (a) adequate offices;
- (b) a technical library available for the competent authority personnel, or another method to ensure receipt, control, and distribution of necessary technical documentation;
- (c) office equipment, including computers and communication means;
- (d) transportation means; and
- (e) personnel protective equipment.

AMC1 ARGH.MGM.200(a)(4) Management system

COMPLIANCE MONITORING PROCESS

The formal process to monitor compliance of the management system with the relevant requirements, and the adequacy of the procedures should:

- (a) include a feedback system of audit findings to ensure implementation of corrective actions as necessary; and
- (b) ensure that the person or group of persons performing compliance monitoring activities have a functional independence from the units/departments they oversee.

AMC1 ARGH.MGM.215(a) Record keeping

GENERAL

- (a) The record-keeping system should ensure that all records are accessible whenever needed within a reasonable time. These records should be organised in a way that ensures traceability and retrievability throughout the required retention period.
- (b) Records should be kept in paper form or in electronic format or a combination of both media. Records stored on microfilm or optical disc form are also acceptable. The records should remain legible and accessible throughout the required retention period. The retention period starts when the record has been created, or last amended.
- (c) Paper systems should use robust material, which can withstand normal handling and filing. Computer systems should have at least one backup system, which should be updated within 24 hours of any new entry. Computer systems should include safeguards against unauthorised alteration of data.
- (d) All computer hardware used to ensure data backup should be stored in a different location from that containing the working data and in an environment that ensures they remain in good condition. When hardware or software changes take place, special care should be taken that all necessary data continue to be accessible at least through the full period specified in ARGH.MGM.215.

AMC1 ARGH.MGM.215(a)(1);(2);(3) Record keeping**RECORDS RELATED TO THE COMPETENT AUTHORITY'S MANAGEMENT SYSTEM**

Records related to the competent authority's management system should include, as a minimum and as applicable:

- (a) the documented policies and procedures;
- (b) the personnel files of competent authority personnel, with supporting documents related to training and qualifications;
- (c) the results of the competent authority's internal audit and safety risk management processes, including audit findings and corrective actions; and
- (d) if applicable, the contract(s) established with qualified entities performing oversight tasks on behalf of the competent authority.

AMC1 ARGH.MGM.215(a)(4) Record keeping**RECORDS RELATED TO ORGANISATIONS PROVIDING GH SERVICES**

Records related to a GH organisation should include:

- (a) declarations received or changes thereto;
- (b) a copy of the continuing oversight programme listing the dates when audits are due and when such audits were carried out;
- (c) continuing oversight records, including all audit and inspection records;
- (d) copies of all relevant correspondence;
- (e) details of any exemption; and
- (f) a copy of any other document approved by the competent authority.

SUBPART OVS – OVERSIGHT AND ENFORCEMENT**GM1 ARGH.OVS.300 Oversight****GENERAL**

- (a) The responsibility for safe conduct of ground handling services lies with the GH organisation. The declaration regime is a recognition that the GH organisation is the first to hold responsibility for monitoring the safety of its operation. The objective cannot be attained unless the organisation is prepared to accept the implications of this policy, including that of committing the necessary resources to its implementation. The content of Part-ORGH is crucial to the success of the policy, as it requires that the GH organisation establish a management system.
- (b) The competent authority assesses the organisation's compliance with the applicable requirements, including the effectiveness of the organisation's management system, on a continuing basis. If the management system is assessed to have failed in its effectiveness, then

this in itself is a breach of the requirements which may, among others, call into question the validity of the declaration.

- (c) The accountable manager is accountable to the competent authority as well as to those who may appoint him or her. Therefore, the competent authority cannot accept a situation in which the accountable manager is denied sufficient funds, manpower or influence to rectify deficiencies identified in the management system.
- (d) Oversight of the organisation includes a review and assessment of the qualifications of the nominated persons.

AMC1 ARGH.OVS.300(a);(b);(c) Oversight

EVALUATION OF A GH ORGANISATION'S SAFETY RISK MANAGEMENT

- (a) As part of the oversight scope, the competent authority should evaluate the GH organisation's safety risk management process and its capability to identify hazards, assess the risks, and apply effective mitigation measures. This should be an identifiable process within the GH organisation's management system.
- (b) As part of the continuing oversight of a GH organisation, the competent authority should also remain satisfied with the effectiveness of the organisation's safety risk management process.
- (c) The competent authority should establish a methodology for evaluating the GH organisation's safety risk management process. The evaluation should be considered positive if the GH organisation demonstrates its competence and capability to:
 - (1) understand the hazards and their consequences on its activities;
 - (2) assess the safety risks related to the identified hazards;
 - (3) be clear on where those hazards may exceed acceptable safety risk limits;
 - (4) identify and implement mitigations to minimise or remove the safety risks; this could be reflected in:
 - (i) the application of effective operational procedures for the provision of the ground handling services subject to the identified hazards;
 - (ii) assessment of the competence and continued competence of its personnel to perform their duties and implement any necessary training; and
 - (iii) ensure sufficient personnel for such duties.

AMC1 ARGH.OVS.300(d) Oversight

INDUSTRY AUDITS

- (a) As part of data collected to support its oversight and develop the basis for a risk-based oversight, the competent authority may take into account the results of Industry audits conducted by third-party industry auditors on the GH organisation.
- (b) The competent authority may credit such industry audits if they meet the following criteria:
 - (1) their scope can easily be mapped against the scope of oversight in accordance with Annex III (Part-ORGH) and Annex IV (Part GH-OPS), as applicable;
 - (2) the audit content is fit for purpose, objective, the audit process is systematic, the auditors have no conflict of interest with the audited organisation and are properly trained;

- (3) audit results are accessible to the competent authority and the relevant safety information from those results can be shared with the competent authorities responsible for the oversight of that organisation, in accordance with Article 62(9) of Regulation (EU) 2018/1139;
 - (4) the competent authority has access to the third-party industry auditor to determine continued compliance with the applicable requirements.
- (c) It should be understood that the third-party industry audits are not a replacement of the oversight activities of the competent authority. The competent authority remains responsible for oversight at all times.
- (d) Conformity of a GH organisation with industry standards or good practices proven through a third-party industry audit is not an automatic recognition of compliance with this Regulation.

GM1 ARGH.OVS.300(d) Oversight

INDUSTRY AUDITS IN THE SCOPE OF ARGH.OVS.300(d)

Various organisations may perform an audit on a GH organisation to verify how it implements different procedures as part of its contractual obligations. The competent authority could decide to use, as relevant, the results from those audits for the purpose of oversight or to better define a GH organisation's safety profile as a basis for a risk-based oversight, besides the safety occurrence reports.

Below is a non-exhaustive list of possible industry auditing organisations:

- (a) an aerodrome operator, to verify that the GH organisation implements the aerodrome procedures applicable to it as per Regulation (EU) 139/2014, such as, for example, the FOD programme, operations in adverse weather conditions, pedestrian access or driving on the airside areas;
- (b) an aircraft operator, to verify that the GH organisation implements the aircraft operator's procedures applicable to it as per Regulation (EU) 965/2012 and Annex VII to Regulation (EU) 2018/1139;
- (c) a third-party industry auditing organisation performing the audit on behalf of an aircraft operator or an aerodrome operator.

AMC1 ARGH.OVS.305 Oversight programme

PROCEDURES FOR OVERSIGHT OF GH ORGANISATIONS

- (a) The competent authority should appoint an inspector for each GH organisation with an overall responsibility for supervision of, and liaison with the organisation's management, and for reporting on compliance with the requirements applicable to its operation. When more than one inspector is assigned to a GH organisation, their responsibilities should be clearly defined.
- (b) Inspections, audits, and oversight procedures, on a scale and frequency commensurate with the operation, should include, but not limited to items from the following list:
 - (1) organisation's management system;
 - (2) safety management, safety risk identification and mitigation actions;
 - (3) reporting records;
 - (4) manuals and procedures;

- (5) training records and written samples of the training process;
 - (6) provision of GH services during the aircraft turnaround process;
 - (7) ground support equipment, including their maintenance records;
 - (8) dangerous goods – operational procedures, training, related documentation.
- (c) The following types of inspections should be included, as part of the oversight programme:
- (1) inspection of documents and records;
 - (2) Inspections of passenger acceptance in view of correct application of procedures related to the safe transportation of dangerous goods in baggage and on the person;
 - (3) inspection of GH activities during turnaround, including passenger boarding and disembarkation;
 - (4) inspection of training to GH personnel;
 - (5) inspection of cargo operations, where applicable, including handling of dangerous goods.
- (d) An inspection/audit should focus on the items selected for the scope of that inspection/audit. Inspections and audits may be conducted jointly or separately. Inspections and audits may also be coordinated with those conducted by the competent authorities responsible for other areas. Joint audits with competent authorities for other areas should also be performed because they are particularly effective to examine the interfaces between different actors at the aerodrome, such as aerodrome operators, GH organisation, and aircraft operators.
- (1) Competent authority inspectors from other domains may also be involved in audits or inspections of GH activities in which they are competent, such as, for example, flight operations inspectors or aerodrome inspectors competent in the oversight of dangerous goods, de-icing/anti-icing operations, or aircraft pushback and towing operations, etc.
- (e) Inspections may, at the discretion of the competent authority, be conducted with or without prior notice to the GH organisation.
- (f) Following the provisions of Article 89 of Regulation (EU) 2018/1139, inspectors should take account of any indication of significant deterioration in the organisation's financial situation that may have a potential safety impact. However, this should not imply that the assessment of the organisation's economic or financial situation is a responsibility of the competent authority. In such a case, the competent authority should immediately inform the competent authority designated for the implementation of the Council Directive on Groundhandling 96/67/EC. The competent authority should also increase technical surveillance of the provision of GH services in such cases, with particular emphasis on the upholding of safety performance and the effectiveness of the organisation's management system.
- (g) The number or the magnitude of the non-compliances identified by the competent authority will serve to support its continuing confidence in the organisation or, alternatively, may lead to an erosion of that confidence. In the latter case, the competent authority will need to review any identifiable shortcomings of the management system and take appropriate action if required.

AMC1 ARGH.OVS.305(a);(b) Oversight programme

REGULAR REVIEW OF THE OVERSIGHT PROGRAMME

- (a) To ensure that its oversight programme is adequately maintained, as required by ARGH.OVS.305, the competent authority should regularly review the oversight planning cycle

and related oversight programme for each organisation to ensure that they remain adequate for any changes in the complexity or safety performance of the organisation.

- (b) When reviewing the oversight planning cycle and related oversight programme, the competent authority should also consider any relevant information collected in accordance with ORGH.GEN.160 and ARGH.OVS.300 (c) and (d).

AMC1 ARGH.OVS.305(b);(d) Oversight programme

OVERSIGHT PROGRAMME AND PLANNING

- (a) When defining the oversight programme and planning the oversight planning cycle for a GH organisation, the competent authority should assess the risks related to the activity of each organisation and adapt the oversight to the level of risk identified and to the organisation's ability to effectively manage those risks. The following elements should be considered to assess the risk exposure of a GH organisation and its safety performance:
- (1) information from the GH organisation's annual activity reports and internal review as per ORGH.MGM.202 and associated AMC;
 - (2) information from the safety reports related to the organisation's GH activities;
 - (3) type(s) of GH services provided at each aerodrome and the specific operational context at those aerodromes;
 - (4) specific procedures implemented by the organisation related to any flexibility provisions in accordance with Article 71 of Regulation (EU) 2018/1139 or alternative means of compliance used;
 - (5) number of contracted services in the scope of GH service provision;
 - (6) the effectiveness of the organisation's management system in addressing non-compliances;
 - (7) any other safety-relevant data resulting from the audits and inspections, including industry audits.
- (b) The oversight programme should follow a risk-based approach and should be developed on a yearly basis.
- (c) The competent authority should include all GH organisations into the programme not later than 12 months after the date of the first declaration received.
- (d) When deciding on the number of stations included into the oversight programme to complete the oversight scope, the competent authority should consider the elements of point ARGH.OVS.305(b) applicable to the station, as well as the result of the oversight of the GH organisation's management system.
- (e) Additional audits and inspections to specific GH organisations may be included in the oversight programme based on the assessment of associated risks carried out within the occurrence reporting scheme(s).
- (f) The sections of the oversight programme dealing with inspections of GH activities performed during turnaround should be developed based on geographical locations, considering aerodrome activity, and focusing on key issues that can be inspected in the time available without unnecessarily delaying the operations.
- (g) The competent authority should include, as part of its oversight, meetings between the accountable manager and the competent authority to ensure both remain informed of

significant issues, on a frequency agreed between the competent authority and the GH organisation.

GM1 ARGH.OVS.305(b) Oversight programme

STATION OVERSIGHT

- (a) A low safety performance demonstrated at the level of management system of a GH organisation may trigger more frequent inspections at individual stations by the national competent authorities of the aerodromes where that GH organisation provides services.
- (b) Likewise, a high safety performance demonstrated at the level of management system of a GH organisation may provide sufficient evidence to enable the national competent authorities responsible for station oversight to reduce the frequency of audits and inspections at the stations in their State.

AMC1 ARGH.OVS.305(c) Oversight programme

OVERSIGHT OF ORGANISATIONS THAT USE INDUSTRY STANDARDS AND GOOD PRACTICES

- (a) For the oversight of a GH organisation that applies industry standards and good practices, the competent authority should verify that their actual implementation in the GH organisation's daily operation complies with this Regulation.
- (b) When a GH organisation declares that it applies industry standards and good practices to comply with the regulation, the competent authority should use this as complementary information to support its risk-based oversight. The implementation of industry standards and good practices by an organisation should not be assessed in isolation from the other elements to be considered by the competent authority for its oversight.
- (c) The competent authority may decide to what extent it intends to use the results of auditing programmes that verify a GH organisation's conformity with the industry standards and good practices.

AMC1 ARGH.OVS.305(d) Oversight programme

AUDIT

- (a) The oversight programme should indicate which aspects will be covered by each audit.
- (b) Part of an audit should concentrate on the organisation's compliance monitoring reports produced by the designated personnel to determine if the organisation is identifying and correcting its problems.
- (c) At the conclusion of the audit, the auditing inspector should complete an audit report, including all findings raised.

AMC2 ARGH.OVS.305(d) Oversight programme

OVERSIGHT PLANNING CYCLE

- (a) The competent authority should schedule audits and inspections appropriate to each organisation's business. The planning of audits and inspections should consider the results of the hazard identification and safety risk management of the organisation. Inspectors should work in accordance with the schedule provided to them.
- (b) When the competent authority varies the frequency of audits or inspections as a result of its assessment of the organisation's safety performance, it should ensure that all aspects of the operation are audited and inspected within the applicable oversight planning cycle.
- (c) If the competent authority wishes to align the oversight planning cycle with the calendar year, it should shorten the first oversight planning cycle accordingly.
- (d) The oversight planning cycle and the related oversight programme should be reviewed annually.
- (e) Audits should include at least one on-site audit of the GH organisation within each oversight planning cycle.

AMC3 ARGH.OVS.305(d) Oversight programme

STATION OVERSIGHT OF ORGANISATIONS PROVIDING GH SERVICES IN MORE THAN ONE MEMBER STATE

- (a) When planning the station oversight to complete the oversight programme for the purpose of cooperative oversight of an organisation providing GH services in more than one Member State, the competent authorities involved should agree on a minimum overall number of stations to be overseen within an oversight cycle.
- (b) That agreed overall number of stations should be relevant for the safety performance of that GH organisation.
- (c) The following criteria should be considered for the selection of stations to be audited or inspected:
 - (1) even spreading across the Member States where that GH organisation provides services;
 - (2) the volume of activity at each of those stations; and
 - (3) the main risk areas identified.
- (d) The planning should be brought to the information of the GH organisations accordingly.

AMC1 ARGH.OVS.310(a) Industry standards

EVALUATION OF A RECOGNISED INDUSTRY STANDARD

- (a) A recognised industry standard is a standard that has been approved by a standardisation body such as, for example, the European Committee for Standardization (CEN) or Society of Automotive Engineers (SAE) or mandated by legal requirements.
- (b) The evaluation process of recognised industry standards that have been issued a certificate by an appropriately accredited organisation may be reduced to the confirmation that they address the scope of Annex III or Annex IV to the GH Regulation, as the case may be.

AMC1 ARGH.OVS.310(b)(1) Industry standards

RELEVANT INDUSTRY STAKEHOLDERS

The affected industry stakeholders represented in the development, maintenance, and endorsement of an industry standard should include but not be limited to aircraft operators, GH organisations, aerodrome operators, product manufacturers, GSE manufacturers, aircraft manufacturers, and regional or global industry associations thereof, as applicable.

GM1 ARGH.OVS.310(b) Industry standards

EXPERIENCE IN THE FIELD, SCIENTIFIC DOCUMENTATION AND SAFETY TESTS SUPPORTING THE DEVELOPMENT OF INDUSTRY STANDARDS AND GOOD PRACTICES

- (a) It is expected that industry standards related to a product are supported by scientific documentation and safety tests, such as:
- (1) ground support equipment,
 - (2) de-icing/anti-icing fluids,
 - (3) fuel.
- (b) It is expected that industry good practices covering GH processes, operations, the use of products, and organisational aspects are rather based on years of experience in the field, trials and errors proving that a certain practice is better than others. It can be difficult to prove good practices are based on scientific evidence or safety tests. Indeed, they are sometimes the result of a safety impact assessment and may be subject to a series of safety test before being disseminated or used on a larger scale.
- (c) The following guidelines¹ can be used to establish criteria for good practices:
- (1) Eligibility criteria:
 - (i) have a clear context description,
 - (ii) have a clear description of the objectives and purposes,
 - (iii) have a clear description of the actions/activities involved,
 - (iv) be at least one year old.
 - (2) Selection criteria:
 - (i) they are relevant to the identified needs,
 - (ii) they have sufficient indication of transferability, such as:
 - (A) they continue after the initial phase;
 - (B) they attract structural funding, support from new sponsors or generate own resources;
 - (C) they show potential for replication in different contexts and towards different target groups.

1 The criteria have been [published](#) by Commission on a different purpose, but they can be extrapolated also to this domain.

- (d) The human factors should be reflected in both industry standards and good practices when applicable.

AMC1 ARGH.OVS.315(a) Oversight tasks

MANAGEMENT SYSTEM ASSESSMENT

- (a) As part of the oversight tasks, the competent authority should assess the organisation's management system and processes to make sure that all the required enablers of a functioning management system are present and suitable.
- (b) When significant changes take place in the organisation, the competent authority should determine whether there is a need to review the existing assessment to ensure that it is still appropriate.

GM1 ARGH.OVS.315(a) Oversight tasks

ASSESSING THE MATURITY OF THE MANAGEMENT SYSTEM OF A GH ORGANISATION

Regarding the evaluation of the maturity of an organisation's management system, the competent authority should verify the following:

- (a) there is evidence that the verified process/feature of the management system is documented in the organisation's management system/safety management system (SMS) documentation;
- (b) the process/feature is suitable based on the size, type of GH activities, and complexity of the organisation, and the inherent risk in the activity;
- (c) there is evidence that the process/feature is in use (operational) and an output is being produced;
- (d) there is evidence that the process/feature is effective, i./e., it achieves the desired outcome and has a positive safety impact.

GM1 ARGH.OVS.320 Declaration of ground handling organisations

VERIFICATION OF DECLARATIONS

The verification of the declaration received from a GH organisation does not imply an assessment of its content or the associated documents or an inspection. The aim is to check whether the declaration complies with the applicable requirements, it has been correctly filled in and signed, there is no missing information, etc.

AMC1 ARGH.OVS.320 Declaration of ground handling organisations

ACKNOWLEDGEMENT OF RECEIPT

Unless otherwise provided for by the electronic system used for declaration registration, the competent authority should acknowledge receipt of the declaration, e.g., in writing, preferably by electronic mail, within 10 to 15 working days.

GM1 ARGH.OVS.320(a) Declaration of ground handling organisations

ASSIGNMENT OF AN INDIVIDUAL REFERENCE NUMBER

It is recommended to create reference numbers for the registration of declarations of GH organisations by commencing with the UN country code of the State of the competent authority to which the declaration is sent, followed by the term '.GH.' and a consecutive numbering (example: AT.GH.001).

AMC1 ARGH.OVS.325(a) Findings, observations, corrective actions and enforcement measures

MANAGEMENT OF FINDINGS

- (a) To ensure that the identified non-compliances are adequately addressed by the GH organisation, the competent authority should:
 - (1) review the root cause(s) identified by the organisation for each confirmed finding, together with the corrective action plan;
 - (2) be satisfied that the root cause(s) identified and the corrective actions proposed by the GH organisation are adequate to correct the non-compliance and prevent re-occurrence,
 - (3) assess the implementation of the accepted corrective actions,
 - (4) be satisfied that the accepted corrective actions have been adequately implemented, and
 - (5) close the finding only after points (1) to (4) have been completed and record all findings and observations.
- (b) In the case of level 2 findings, the competent authority should first grant the organisation a period to submit the root cause(s) and corrective action plan. This period should be shorter than the corrective action implementation period, to provide sufficient time for the organisation and the authority to agree on an acceptable corrective action plan and for the organisation to implement it before the end of the implementation period.
- (c) The competent authority should monitor all due dates agreed in accordance with points (a) and (b).

GM1 ARGH.OVS.330 Cooperative oversight

SYSTEMIC AND OPERATIONAL NON-COMPLIANCES

- (a) A *systemic non-compliance* is understood as a non-compliance related to the main components of a GH organisation's management system, such as
 - (1) SMS,
 - (2) compliance monitoring process,
 - (3) documentation system,
 - (4) the training programme,
 - (5) the ground support equipment (GSE) operation and maintenance programme,
 - (6) general approach to the operational procedures.
- (b) A systemic non-compliance does not include:

- (1) operational procedures specific to an aerodrome as required by the aerodrome operator;
 - (2) risk assessment and risk mitigation measures developed for the operational context of an aerodrome.
- (c) By comparison, an *operational non-compliance* is specific to an individual station, as it is related to the individual way in which the management system or operational requirements are implemented at that aerodrome. These are, by default, non-systemic issues, which are not reiterated at other stations where that GH organisation provides services. An operational non-compliance does not require an action on the part of another competent authority in another Member State.

GM2 ARGH.OVS.330 Cooperative oversight

COOPERATIVE OVERSIGHT RESPONSIBILITIES IN CASE OF SYSTEMIC NON-COMPLIANCES (LEVEL-2 FINDINGS)

- (a) If a systemic non-compliance of a GH organisation providing services in more than one Member State is not addressed at management system level, it may cascade down to all the individual stations, thus generating findings at all stations where the organisation provides GH services. That is why a systemic non-compliance requires enhanced communication and cooperation between all the competent authorities overseeing that GH organisation: it is essential that they all apply similar corrective actions to address that non-compliance in the same manner at the affected stations under their oversight responsibility.
- (b) When the competent authority at the organisation's principal place of business (PPoB) raises a finding on a management system component, it can already be considered a potential systemic non-compliance. The other competent authorities concerned will use this information when preparing their own audits/inspections of a station in their Member State. Each competent authority is responsible to verify that the systemic non-compliance has been addressed at the individual stations in its Member State.
- (c) If a level-2 finding is raised by any competent authority, other than the one of the organisation's PPoB, the systemic or operational nature of that non-compliance can only be determined once another audit/inspection in another Member State confirms it. As the information from all audits and inspections is shared among the competent authorities involved in the oversight of that organisation, they will all be aware of the systemic findings. Similar to point (b), the other competent authorities concerned will use this information when preparing their own audits/inspections in their Member State. Each competent authority is responsible to verify that the systemic non-compliance has been addressed at the individual stations in its Member State.
- (d) The information related to systemic non-compliances can be useful to assess the safety performance of the organisation as a whole.

GM3 ARGH.OVS.330 Cooperative oversight

METHODS TO IMPLEMENT COOPERATIVE OVERSIGHT

The competent authorities concerned could consider any of the examples provided below to ensure continuing communication and consultation among themselves to establish an efficient cooperative oversight (the list is not comprehensive):

- (a) Develop a common toolbox of materials and checklists to be used when conducting inspections and audits.

- (b) Establish procedures to cover methods and timing for communicating on and sharing of relevant information necessary for the oversight; for example:
 - (1) the result of the assessment of the management system is shared every time the assessment is conducted by one of the competent authorities;
 - (2) the AltMoCs are shared as soon as they are received by the competent authority of the State of the organisation's principal place of business;
 - (3) ensure prompt reaction if one of the competent authorities shares serious concerns about the organisation with another competent authority, etc.
- (c) Develop a common training programme and deliver training sessions for all GH inspectors.
- (d) Organise joint inspections of the management system of the GH organisation.
- (e) Discuss together the findings raised, their legal basis, and the corrective actions proposed by the organisation. Identify the best way forward for similar cases.
- (f) Organise sessions of recurrent training to include exchange of experience in another Member State, to exchange best practices with inspectors from other competent authorities.
- (g) Additional support could refer to the translation of relevant parts of an audit report or of occurrence reports from the original language into English or any other language upon which the competent authorities concerned agree.

AMC1 ARGH.OVS.330(c)(2) Cooperative oversight

SHARING INFORMATION RELATED TO ALTERNATIVE MEANS OF COMPLIANCE

If an AltMoC submitted by a ground handling organisation part of a single ground handling business grouping or a single aircraft operator business grouping for self-handling is applicable only at certain aerodromes, the competent authority receiving the AltMoC should ensure that all the competent authorities concerned have access to it.

The competent authorities of the aerodromes where that AltMoC applies should cooperate to ensure the AltMoC content is evenly accepted and assessed at all the aerodromes where it is applied.

AMC1 ARGH.OVS.335 Approval of dangerous goods training programmes

PROCEDURE FOR APPROVAL

The competent authority should assess the training programme submitted by a GH organisation and issue an approval no later than 24 months after the training programme has been submitted by that GH organisation.

ANNEX III

ORGANISATION REQUIREMENTS FOR ORGANISATIONS PROVIDING GROUND HANDLING SERVICES (PART-ORGH)

SUBPART GEN – GENERAL REQUIREMENTS

GM1 ORGH.GEN.105 Competent authority

PRINCIPAL PLACE OF BUSINESS

- (a) For GH organisations providing services in more than one Member State and GH organisations part of a single GH organisation business grouping, which have a principal place of business in a Territory of the Treaties, the entry point for all the information related to their declaration and GH activities at all EU aerodromes within the scope of the GH Regulation is considered to be the competent authority of the Member State where their principal place of business is located.
- (b) The following criteria are used to identify an organisation's principal place of business:
- (1) All financial operations and decisions affecting an organisation as a whole and operational, capable not only to receive funds and profits and reward shareholders, but also to fulfil its obligations and make due payments, ranging from costs with staff and facilities to compliance with contractual, tax or any other financial obligations, payment of dividends, salaries, employment benefits, investment decisions, etc. The financial functions require planning and management of the funds of the organisation, which cannot be artificially dissociated from the operations of that organisation. The financial managerial functions are therefore essential to run a business and are a strong indicator of where the actual seat and management of the organisation take place and to which system of law it has the closest link.
 - (2) The principal operational control of an organisation's activities entails managing operational decisions of the organisation on a regular basis. A place from where the supply of services is monitored and controlled is indicative for determining the organisation's place of operational control.
 - (3) The organisation's accountable manager is ultimately responsible for safety. He or she is responsible for ensuring that all activities can be financed and carried out in accordance with the applicable requirements, and that the organisation is adequately structured and staffed with suitably qualified staff. As the ultimate responsible for safety and compliance vis à vis the competent authority, the accountable manager should either reside permanently in the country where the PPOB is or demonstrate to the satisfaction of the Authority that there are suitable means in place to discharge their responsibilities in full while not residing at the PPOB.
 - (4) The organisation's key personnel (nominated person for ground handling operations, safety manager, compliance monitoring manager, training manager, etc.) controls and coordinates daily operational activities, including holding operational management meetings and processing of operational correspondence, that ultimately lead to meeting the safety objectives of the EU aviation safety *acquis*.

- (5) The head office or registered office is the place where all decision-making that affects the development of the entire corporate administration and coordination of the necessary actions are taking place on a daily or regular basis.
 - (6) The records regarding the operational and financial decisions affecting the direction, control, planning, coordination and corporate finance of the organisation's activities and operations, within the scope of the applicable regulations, are always tangible and potentially subject to physical inspection and/or assessment by the competent authority.
- (c) The principal place of business for aircraft operators performing self-handling is already determined in accordance with Regulation (EU) 965/2012.

AMC1 ORGH.GEN.110(a) Responsibilities of the GH organisation

COMPLIANCE WITH APPLICABLE REQUIREMENTS

- (a) The GH organisation should conduct regular reviews of the applicable requirements with which it declares compliance, to ensure its processes, procedures and documentation remain current and up to date. The relevant elements of these reviews should be reflected in its annual activity report.
- (b) In conducting such reviews, the GH organisation should:
 - (1) ensure that any changes in the applicable requirements, standards and documents or new requirements applicable to it are identified and assessed for inclusion into their own management system; and
 - (2) be able to show evidence of such reviews and assessments.

GM1 ORGH.GEN.110(b) Responsibilities of the GH organisation

GROUND HANDLING MANUAL

If the organisation providing GH services already has an operations manual in accordance with Regulation (EU) 965/2012 or an aerodrome manual in accordance with Regulation (EU) 139/2014, as part of its management system, then it only needs to amend its manual to incorporate the GH specific elements. The organisation may decide how to organise its ground handling manual, whether it intends to have a single manual to include all procedures and mandatory elements of all the organisations integrated in its management system or issue separate parts for each of them, with cross-references to one another.

GM1 ORGH.GEN.115 Start of operation

PREPARATION STEPS

- (a) The intention of the implementing rule is to set up the right order of these steps, to minimise the efforts of the GH organisation to start operation at an aerodrome that restricts access in accordance with the Council Directive 96/67/EC.
- (b) Examples of the formal arrangements with the aerodrome operator may include, subject to the aerodrome operational context, operational procedures of the GH organisation that may have an impact on the operation of on the aerodrome.

- (c) When a GH organisation intends to provide services at aerodromes where the Council Directive 96/67/EC (The GH Directive) applies, it is recommended that the organisation already starts preparing for compliance with the GH Regulation and the applicable provisions referred to in the declaration even before the completion of formalities to receive the authorisation to operate at an aerodrome where the GH Directive applies to their services. In such a case, the GH organisation may indicate, as evidence of its intentions, an initial letter of intent or any other document to show that it has already received or is in the process of receiving the authorisation to operate at that aerodrome. If an authorisation is not granted, the organisation should withdraw its declaration.

AMC1 ORGH.GEN.120 Means of compliance

DEMONSTRATION OF COMPLIANCE

- (a) To demonstrate that the implementing rules are complied with, the GH organisation should complete and document a risk assessment for the alternative means of compliance (AltMoCs) used. The result of this risk assessment should demonstrate that those AltMoCs reach an equivalent level of safety to that established by the Acceptable Means of Compliance (AMC) adopted by the Agency.
- (b) The GH organisation should ensure the competent authority receives the risk assessment for the AltMoCs it uses in due time before an audit or inspection.

AMC2 ORGH.GEN.120 Means of compliance

INFORMATION AND COORDINATION

- (a) The GH organisation should inform the aircraft operators or the aerodrome operators concerned if its alternative means of compliance (AltMoCs) have an impact on the procedures or instructions applicable to the provision of GH services under the current requirements.
- (b) The GH organisation should also coordinate and agree on any such interferences with the organisation affected by those AltMoCs.
- (c) If an AltMoC is applicable only at certain stations, those stations should be mentioned in the respective AltMoC, for an easier information of the relevant competent authority.

GM1 ORGH.GEN.120 Means of compliance

INFORMATION TO THE COMPETENT AUTHORITY AND RISK ASSESSMENT

- (a) The competent authority to which the GH organisation should submit the list of means of compliance it uses is the one as identified in ORGH.GEN.105.
- (b) It is recommended that the GH organisation conducts the risk assessment to the AltMoCs used at head office level, so that the risk assessment is valid and applicable to all stations. This is intended to avoid inconsistencies between the stations where the GH organisation provides services.

AMC1 ORGH.GEN.125 Use of industry standards

INDUSTRY STANDARDS AND GOOD PRACTICES

- (a) For the purpose of the GH Regulation, industry standards and good practices are documented technical or operational instructions, procedures or specifications applied on a wide scale in the ground handling industry that establish norms, principles, and criteria to standardise various aspects of the ground handling operations, processes, products or equipment.
- (b) The GH organisation may apply one or more industry standards and good practices on a voluntary basis to comply with the implementing rules. The industry standard may cover any of the following elements:
 - (1) Management of a GH organisation, including the SMS, documentation system, the compliance monitoring function, contracted services, emergency response plan;
 - (2) standard operational procedures for the provision of GH services and any physical or virtual tools, equipment, applications or programmes used;
 - (3) training for the GH functions;
 - (4) technical and/or safety specifications for products and equipment used for the provision of GH services.
- (c) The organisation should ensure that the industry standards and good practices which it uses to comply with the GH Regulation meet the criteria for safety and quality of point ARGH.OVS.310(b).
- (d) The GH organisation should document the deviations from the applied industry standards that affect safety of operation. Where deemed relevant, the organisation should develop a safety risk assessment of those deviations.

Use of industry standards and internal compliance monitoring checks

- (e) When using industry standards and good practices to comply with the GH Regulation, the organisation should include this verification in its compliance monitoring process.

Use of third-party service provider to verify conformity with industry standards

- (f) When using the services of a third-party industry auditor to verify its conformity with industry standards and good practices, the GH organisation should comply with the requirements of ORGH.GEN.205 for contracted services.
- (g) The GH organisation should remain aware that conformity with the industry standards and good practices demonstrated through third-party industry audits does not automatically ensure compliance with the implementing rules.

GM1 ORGH.GEN.125 Use of industry standards

INDUSTRY STANDARDS AND GOOD PRACTICES IN THE SCOPE

Industry standards and good practices refer to sets of documents developed by Industry and used by organisations for the provision of GH services to implement the requirements of the GH Regulation.

- (a) Examples of such industry standards and good practices adopted by Industry are provided below; the list is not exhaustive:
 - (1) IATA Ground Operations Manual (IGOM),

- (2) IATA Airport Handling Manual (AHM),
- (3) IATA Cargo Handling Manual (ICHM),
- (4) IATA Dangerous Goods Regulations (DGR),
- (5) IBAC IS-BAH ground handling for business aviation operations,
- (6) Joint Inspection Group (JIG) standards related to fuelling,
- (6) Society of Automotive Engineers (SAE) standards related to de-icing and anti-icing,
- (8) EN standards for ground support equipment (EN 12312-1 to 20 and EN 1915-1 to 4).

GM1 ORGH.GEN.130(a) Management of changes

ASSESSMENT OF CHANGES

- (a) The GH organisation could assess the safety risk of a change by following these steps:
 - (1) identify the scope of the change;
 - (2) identify and assess the hazards;
 - (3) determine safety criteria to assess the change;
 - (4) evaluate the potential safety risks related to the change. Apply mitigation measures to minimise the risks and ensure the change meets the applicable safety criteria; and
 - (5) specify the necessary monitoring actions to ensure that the provision of GH services will continue to meet the safety criteria after the change has been applied.
- (b) The scope of the safety risk assessment includes the following elements and their interaction:
 - (1) the operation, management, human resources, technological challenges;
 - (2) the interfaces and interactions between the elements being changed and the rest of the system;
 - (3) the interfaces and interactions between the elements being changed and the operational context in which they are intended to perform; and
 - (4) the full lifecycle of the change from conception to operations.
- (c) The safety criteria used for the safety assessment of a change:
 - (1) are defined in accordance with the procedures for the management of changes contained in the organisation's ground handling manual;
 - (2) should address potential safety risks with an outcome such as aircraft damage, application of wrong operational procedures, apron accidents or incidents, or staff injuries;
 - (3) are specified with reference to the quantitative acceptable levels of safety risks.
- (d) Examples of changes triggering a safety risk assessment. Such changes should be understood as changes that may affect the safety performance of a GH organisation (the list is not exhaustive):
 - (1) provision of new GH services at existing stations,
 - (2) new GSE or GSE based on new technologies,
 - (3) new stations,
 - (4) new clients,
 - (5) personnel-related issues, e.g., high staff turnover or insufficient personnel,

- (6) new AltMoC,
- (7) changes of the applicable regulations, applied industry standards and good practices if these do not have a safety risk assessment already completed,
- (8) new training methods or new training providers,
- (9) significant changes to the operational procedures,
- (10) new contracted services related to the provision of GH services,
- (11) transition of GH services between service providers or between a GH organisation and an aerodrome operator (e.g., PRM handling, operation of passenger boarding bridges)

GM1 ORGH.GEN.130(b) Management of changes

CHANGES NOT AFFECTING THE DECLARATION

- (a) The intent of the rule is to cover also other changes that are not directly reflected in the declaration but could influence the capability to discharge the responsibility for the provision of GH service as declared. Such changes should also be managed appropriately, for example, a change to the organisation's financial structure or the human resource procedures. Such changes may have an indirect effect on the organisation's management system, but they do not have to be notified to the competent authority.
- (b) The GH organisation is not expected to inform the competent authority every time it changes its documentation. For example, changes such as an amendment to the ground handling manual, a procedure, updates to the training programme, a station representative, or the GSE maintenance programme do not need to be notified to the competent authority.
- (c) The GH organisation only needs to ensure that the competent authority has the latest updates of the GH organisation's documentation, including the items mentioned above, in due time before an inspection or audit.

AMC1 ORGH.GEN.130(c) Management of changes

SMALL AND NON-COMPLEX GH ORGANISATIONS

Small and non-complex GH organisations should provide a minimum assessment of the risks arising from significant changes to their organisation or provision of GH services by including them in the safety risk register.

GM1 ORGH.GEN.145 Provision of documentation for oversight purposes

SUBMITTING THE GROUND HANDLING MANUAL FOR OVERSIGHT PURPOSES

If the organisation providing GH services is an aerodrome operator or a self-handling aircraft operator that already has an aerodrome manual or an operations manual that contains GH elements, such organisations are expected to submit only those parts of their manuals that are relevant to show compliance with this Regulation.

AMC1 ORGH.GEN.150(b) Findings and corrective actions

GENERAL

- (a) The corrective action plan defined by the organisation providing GH services should address the effects of the non-compliance, as well as its root cause(s) and contributing factors(s).
- (b) When a finding is raised at an individual station of a GH organisation providing GH services in more than one Member State that may or may not be part of a single GH organisation business grouping, the GH organisation may decide how the corrective action will be implemented – either at station level, at country level, or at management system level, aiming to address the issue at all the stations where the same finding has been or may be raised.
- (c) In the case of level 2 findings, the GH organisation should submit a root cause analysis and a corrective action plan to the competent authority within a specified period of time. This period should be shorter than the corrective action implementation period, in order to provide sufficient time for the competent authority to agree on the submitted corrective action plan and for the GH organisation to implement it before the end of the implementation period.

GM1 ORGH.GEN.150 Findings and corrective actions

CAUSAL ANALYSIS

- (a) It is important that the analysis does not primarily focus on establishing who or what caused the non-compliance, but on why it was caused. Establishing the root cause(s) of a non-compliance often requires an overarching view of the events and circumstances that led to it, to identify all the possible systemic and contributing factors (regulatory, human factors (HF), organisational factors, technical, operational, etc.) in addition to the direct factors.
- (b) A narrow focus on single events or failures to identify the chain of events that led to the non-compliance may not properly reflect the complexity of the issue. Such an approach might lead to ignoring important factors that must be addressed to prevent a reoccurrence. An inappropriate or partial causal analysis often leads to defining 'quick fixes' that only address the symptoms of the non-conformity. A peer review of the results of the causal analysis may increase its reliability and objectivity.
- (c) A system description of the organisation that considers the organisational structures, processes and their interfaces, procedures, staff, equipment, facilities and the environment in which the organisation operates, will support both effective causal (reactive) and hazard (proactive) analyses.

GM1 ORGH.GEN.160(b) Reporting of safety-related occurrences

REPORTABLE EVENTS – GROUND HANDLING SPECIFIC OCCURRENCES

The following list contains the reportable ground handling occurrences as published in Annex IV to Regulation (EU) 2015/1018 Occurrences related to aerodromes and ground services, points 1 and 2. The list is detailed here for awareness.

- (1) Incorrect handling or loading of passengers, baggage, mail or cargo, likely to have a significant effect on aircraft mass and/or balance (including significant errors in loadsheet calculations).
- (2) Boarding equipment removed leading to endangerment of aircraft occupants.

- (3) Incorrect stowage or securing of baggage, mail or cargo likely in any way to endanger the aircraft, its equipment or occupants or to impede emergency evacuation.
- (4) Transportation, attempted transportation, or handling of dangerous goods which resulted or could have resulted in the safety of the operation being endangered or led to an unsafe condition (for example: dangerous goods incident or accident as defined in the ICAO Technical Instructions).
- (5) Non-compliance on baggage or passenger reconciliation.
- (6) Non-compliance with required aircraft ground handling and servicing procedures, especially in de-icing, refuelling or loading procedures, including incorrect positioning or removal of equipment.
- (7) Significant spillage during fuelling operations.
- (8) Loading of incorrect fuel quantities likely to have a significant effect on aircraft endurance, performance, balance or structural strength.
- (9) Loading of contaminated or incorrect type of fuel or other essential fluids (including oxygen, nitrogen, oil and potable water).
- (10) Failure, malfunction or defect of ground equipment used for ground handling, resulting into damage or potential damage to the aircraft (for example: tow bar or GPU (Ground Power Unit)).
- (11) Missing, incorrect or inadequate de-icing/anti-icing treatment.
- (12) Damage to aircraft by ground handling equipment or vehicles including previously unreported damage.
- (13) Any occurrence where the human performance has directly contributed to or could have contributed to an accident or a serious incident.

GM2 ORGH.GEN.160(b) Reporting of safety-related occurrences

COMPETENT AUTHORITY FOR REPORTING IN ACCORDANCE WITH REGULATION (EU) 376/2014

The wording 'any other organisation required to be informed by the Member State where the aerodrome is located,' refers to any organisation that is appointed by a Member State as responsible with the investigation of aviation occurrences in accordance with Regulation (EU) 376/2014. This organisation can be different from the competent authority of the aerodrome where the occurrence took place.

GM1 ORGH.GEN.160(b)(1) Reporting of safety-related occurrences

REPORTING DANGEROUS GOODS EVENTS

- (a) The 'appropriate authority of the State of occurrence' means, for the purpose of dangerous goods reporting, the national competent authority or authorities designated or otherwise recognised by a State to perform specific functions related to the dangerous goods provisions.
- (b) In this case, the appropriate authority is the national civil aviation authority of the State of occurrence.
- (c) The dangerous goods events expected to be reported in accordance with the Technical Instructions include:

- (1) any dangerous goods accident or incident;
- (2) the discovery of undeclared or misdeclared dangerous goods in cargo or mail;
- (3) the finding of dangerous goods carried by passengers or crew members, or in their baggage, when not in accordance with Part 8 of the Technical Instructions.

AMC1 ORGH.GEN.160(e) Reporting of safety-related occurrences

FOLLOW-UP OF OCCURRENCES

- (a) The GH organisation should ensure that the reporting process ends with clear follow-up actions. The follow-up actions should include at least the following steps, documented in writing:
 - (1) the investigation of an occurrence and the analysis that led to the identification of the root cause;
 - (2) the results of the investigation;
 - (3) the conclusions of an occurrence;
 - (4) the actions taken to prevent similar occurrences in the future; when relevant, those actions should be included in the SMS, with a risk assessment, mitigation measures and safety performance indicators;
 - (5) the dissemination and promotion of the actions taken, such as, but not limited to, a change in a procedure or the GH services manual, updates to the training programme, providing feedback to the reporter (when this is not anonymous), safety promotion actions, further actions with other stakeholders involved, etc.;
 - (6) the follow-up plan.

GM1 ORGH.GEN.160(e) Reporting of safety-related occurrences

REPORTABLE EVENTS AND FOLLOW-UP REPORTS

- (a) Key principles of reporting:
 - (1) In accordance with Regulation (EU) 376/2014, organisations are required to report all mandatory reportable occurrences they have collected, i.e., those contained in Regulation (EU) 2015/1018.
 - (2) Not all occurrences collected under a voluntary reporting system are reportable to the competent authority. Only those that may involve an actual or potential aviation safety risk (Article 5(5) and (6) of Regulation (EU) 376/2014, covering voluntary reporting) are reportable to the competent authority.
- (b) 'Reportable events' are those events subject to an initial notification report requirement as described in the principles above.
- (c) It is understood that the GH organisation discusses with the competent authority to determine what types of occurrences are considered involving an actual or potential aviation safety risk. This should ensure an alignment between the occurrences that the organisation intends to transfer from the voluntary occurrence reporting system and the ones that the competent authority expects to receive. It should also ensure harmonisation among all organisations reporting to the same competent authority.

- (d) Regulation (EU) 376/2014 gives Member States the possibility to request their organisations to transfer to them all occurrences they have collected under their voluntary occurrence reporting system (Article 5(6)).
- (e) When receiving a report on an occurrence, the GH organisation might need to assess whether that reported occurrence is subject to mandatory or voluntary occurrence reporting and consequently apply the relevant notification obligations. If a reporter has transferred the report under a voluntary occurrence reporting system, the organisation may reclassify it into a mandatory occurrence report and vice-versa.
- (f) The GH organisation is encouraged to include all available relevant information in the notification to the competent authority. If appropriate, this should include the indication that no further analysis and follow-up will be made on that occurrence ('closed-on-issue') or the assessment and actions on the safety risk identified from the occurrence.

AMC1 ORGH.GEN.165 Safety reporting system

GENERAL

- (a) The safety reporting system should include the possibility for voluntary reporting intended for safety hazards identified by the reporter which may have potential safety consequences.
- (b) The reports should meet the requirements of ORGH.GEN.160 on occurrence reporting in terms of time, format, and required information to be reported. The GH organisation should provide the means and format for reporting when this is not established by the relevant authorities under ORGH.GEN.160.
- (c) The safety reporting system should include acknowledgement to the reporter of the successful submission of the report.
- (d) The reporting process should be kept simple and include details on what, how, where, and when to report.
- (e) Access to submitted reports should be restricted to personnel responsible for storing and analysing them.

GM1 ORGH.GEN.165(a)(4) Safety reporting system

SAFETY RELEVANT INFORMATION

- (a) The safety relevant information that should be shared with the aircraft operator or aerodrome operator, or both, to improve the flight safety and improve the operational procedures to address the safety interfaces between them should include information, data, facts and analysis collected from various sources, such as, but not limited to:
 - (1) daily operational performance,
 - (2) audits, inspections, findings and corrective actions,
 - (3) safety reports,
 - (4) accident/incident investigations,
 - (5) safety studies and reviews from official and verified sources.
- (b) The communication of safety relevant information may occur also outside the regulatory framework of occurrence reporting as per ORGH.GEN.160 that implements the essential requirements of Regulation (EU) 2018/1139 (point 4.2.2 of Annex VII). For example, the

aerodrome safety committee meetings (see AMC1 ADR.OR.D.027 in associated EASA Decision to Regulation (EU) 139/2014) could be used to keep regular communications on safety matters and share good practices, common procedures, and safety information relevant for the interface processes.

AMC1 ORGH.GEN.165(b)(1) Safety reporting system

INTERNAL SAFETY REPORTING

- (a) Each internal safety reporting scheme should ensure confidentiality and enable and encourage free and frank reporting of any potentially safety-related occurrence, including incidents such as errors or near misses, safety issues and identified hazards. This will be facilitated by the establishment of a just culture.
- (b) The internal safety reporting scheme should contain the following elements:
 - (1) clear aims and objectives with demonstrable corporate commitment;
 - (2) a just culture policy as part of the safety policy, and related just culture implementation procedures;
 - (3) a process to:
 - (i) identify those reports which require investigation; and
 - (ii) when so identified, investigate all the causal and contributing factors, including technical, organisational, managerial, or human factors issues, and any other contributing factors related to the occurrence, incident, error or near miss that was identified;
 - (iii) if adapted to the size and complexity of the organisation, analyse the collective data showing the trends and frequencies of the contributing factors;
 - (4) appropriate corrective actions based on the findings of investigations;
 - (5) initial and recurrent training for staff involved in internal investigations;
 - (6) where relevant, the organisation should cooperate with the aircraft operator and the aerodrome operator on occurrence investigations by exchanging relevant information to improve aviation safety.
- (c) The internal safety reporting scheme should:
 - (1) ensure that actions are taken internally to address safety issues and hazards; and
 - (2) feed into the recurrent training while maintaining the appropriate confidentiality.

GM1 ORGH.GEN.165(b)(4) Reporting of safety-related occurrences

SAFETY INVESTIGATION TEAM

It is recommended that the GH organisation ensure that the team involved in the analysis of the report includes:

- (a) GH personnel that are competent in the area or subject of the occurrence,
- (b) a staff representative to help the organisation identify relevant mitigating actions to prevent the reoccurrence of such events;
- (c) in case of a complex GH organisation, a trained investigator.

AMC1 ORGH.GEN.165 Safety reporting system

SMALL GH ORGANISATIONS

A small GH organisation should prove compliance with the requirements of ORGH.GEN.165 by ensuring its safety reporting system addresses the following aspects:

- (a) it records the mandatory and voluntary reports;
- (b) it determines whether the reported event qualifies for reporting under points ORGH.GEN.160(b) and (c);
- (c) necessary actions are taken to address the root cause of the event and prevent reoccurrences;
- (d) it participates in the investigation of reports conducted by the aerodrome operator or the aircraft operator, as appropriate, where the ground handling organisation is directly affected by the event or the proposed mitigation measures;
- (e) any actions taken as a result of the root cause analysis are communicated to the employees concerned.

GM1 ORGH.GEN.165 Reporting of safety-related occurrences

SAFETY REPORTING CULTURE – UNDERSTANDING THE RISKS OF NOT REPORTING

In a non-functioning or badly functioning operational environment, events go unreported due to fear of repercussions, lack of awareness, priority to complete first the task, or training on occurrence reporting and just/learning culture, etc.

In a well-functioning operational environment, the just culture within the organisation facilitates the accurate reporting of events by ground handling staff when it occurs to ensure that an assessment is carried out.

- (a) **Key risk areas:**
 - (1) damage done to the aircraft may go unnoticed by the flight crew, especially for aircraft with carbon fibre structures;
 - (2) events are not properly understood as an accurate root-cause analysis is much harder to perform.
- (b) **Potential consequences:**
 - (1) unnoticed aircraft damage may endanger the flight;
 - (2) effective corrective actions cannot be put in place;
 - (3) increase in damage-related costs.
- (c) **Mitigations:**
 - (1) training programme of personnel to include SMS, explaining the values of having a safety culture and a healthy, non-punitive safety reporting system;
 - (2) just culture to encourage proper reporting, thus enabling damage assessment and event analysis.

GM1 ORGH.GEN.170 Psychoactive substances and medicines

ICAO GUIDANCE AND AERODROME OPERATOR PROCEDURE

- (a) Further guidance on this issue may be found in the ICAO Manual on Prevention of Problematic Use of Substances in the Aviation Workplace (Doc 9654).
- (b) Alternatively, the GH organisation may adopt the aerodrome operator procedure in this sense and refer directly to it in its own documentation.

SUBPART MGM — MANAGEMENT SYSTEM

AMC1 ORGH.MGM.200(a) Management system

SMALL GH ORGANISATIONS

A small GH organisation is considered an organisation that has up to maximum 10 full-time equivalent (FTE) employees. It may perform any of the GH activities listed in Article 2 of this Regulation.

GM1 ORGH.MGM.200(a) management system

SMALL GH ORGANISATIONS

- (a) The maximum number of full-time equivalents (FTE) should be regarded as an annual average, to accommodate any seasonal fluctuations.
- (b) For example, a GH organisation may have 15 FTE in the summer and 5 FTE in winter.

AMC2 ORGH.MGM.200(a) Management system

SAFETY MANAGEMENT SYSTEM FOR SMALL GH ORGANISATIONS

- (a) Small GH organisations should develop and implement a safety management system (SMS) that is commensurate with the safety risks of their organisation and activities performed.
 - (1) The safety policy of these organisations should express a commitment to ensure adherence to the safety standards required by the GH Regulation, improve and maintain the safety of its activities, comply with the applicable requirements, consider best practices and provide appropriate resources for the discharge of its responsibilities as declared.
 - (2) Safety risk management may be performed using hazard checklists or similar risk management tools or processes, which are integrated into the activities of the organisation.
- (b) The organisation should identify a person who fulfils the role of safety manager and who is responsible for coordinating the safety-management-related processes and tasks. This person may be the accountable manager or a person with an operational role within the organisation.

GM2 ORGH.MGM.200(a) Management system

SAFETY RISK ASSESSMENT – RISK REGISTER FOR SMALL ORGANISATIONS

- (a) The GH organisation should develop its risk register based on at least the following aspects:
- (1) individual steps of the operational procedures applied for the provision of the GH services
 - (2) training of personnel
 - (3) adequate resources for the provision of GH services
 - (4) existence of operational procedures and instructions for the provision of GH services
 - (5) changes in the usual way of providing GH services
 - (6) operational context, aerodrome context, weather
 - (7) if applicable, serviceability condition of any GSE used
- (b) The results of the assessment of the potential adverse consequences or outcome of each hazard may be recorded in a risk register, an example of which is provided below:

Hazard		Safety risks (i.e., how could those hazards lead to an incident or accident)	Severity/likelihood pre-mitigation		Existing controls (how the safety risk is mitigated)	Additional mitigation required?	Severity/likelihood post-mitigation		Who does what in applying the mitigations
Nº.	Description		Severity	Likelihood			Severity	Likelihood	

GM1 ORGH.MGM.200(b)(1) Management system

ACCOUNTABILITY, RESPONSIBILITY AND SENIOR MANAGEMENT

- (a) Senior management is usually a group consisting of the persons whose functions are performed at the highest level of management in the organisation, immediately below the board or directors.
- (b) Other terms used: executive management, higher management, management team.
- (c) For the purpose of this Regulation, senior management includes the accountable manager.
- (d) The GH organisation may have a reduced structure for the senior management, where several functions can even be fulfilled by a single person.
- (e) In the English language, the notion of accountability is different from the notion of responsibility. Whereas 'accountability' refers to an obligation which cannot be delegated, 'responsibility' refers to an obligation that can be delegated.
- (f) Senior management should:

- (1) continually promote the safety policy to all personnel and demonstrate their commitment to it;
- (2) provide necessary human and financial resources for its implementation; and
- (3) establish safety objectives and performance standards.

AMC1 ORGH.GEN.200(b)(2)(i) Management system

SAFETY POLICY FOR COMPLEX ORGANISATIONS

- (a) The safety policy should:
 - (1) be endorsed by the accountable manager;
 - (2) reflect organisational commitments regarding safety and its proactive and systematic management;
 - (3) be communicated, with visible endorsement, throughout the organisation; and
 - (4) include safety reporting principles.
- (b) The safety policy should include a commitment:
 - (1) to improve towards the highest safety standards;
 - (2) to comply with all applicable legislation, meet all applicable standards and consider best practices;
 - (3) to provide appropriate resources;
 - (4) to enforce safety as one primary responsibility of all managers; and
 - (5) not to blame someone for reporting something which would not have been otherwise detected.
- (c) Senior management should:
 - (1) continually promote the safety policy to all personnel and demonstrate their commitment to it;
 - (2) provide necessary human and financial resources for its implementation; and
 - (3) establish safety objectives and performance standards.

GM1 ORGH.MGM.200(b)(2) Management system

SAFETY MANAGEMENT SYSTEM

- (a) Safety management seeks to proactively identify and further predict hazards and mitigate the related safety risks before they result in aviation accidents and incidents. Safety management enables an organisation to manage its activities in a more systematic and focused manner. When an organisation has a clear understanding of its role in, and contribution to, aviation safety, this enables the organisation to prioritise safety risks and more effectively manage its resources for optimal results.
- (b) Safety should not be considered the responsibility of a single person or a limited group of people in the organisation. A safety culture should be developed throughout the organisation, which involves all the personnel as active contributors to the safety of the final product or service.

- (c) It is important to recognise that safety management will be a continuous activity, as hazards, risks, as well as the effectiveness of safety risk mitigations, will change over time.
- (d) The safety management capability of an organisation should be commensurate with the safety risks to be managed, which can be at the service level or at the organisational level.
- (e) The risks that are inherent in a complex structure require a robust safety risk management process. Consequently, scalability and suitability of the safety management element should be a function of the inherent safety risk capability of the organisation. For instance, for organisations with a lower risk level:
 - (1) the risk assessment model that is used may be very simple in cases in which the identified hazards are easy to mitigate;
 - (2) expert judgement might be sufficient to measure the efficiency of safety barriers;
 - (3) the collection of data, safety information, and occurrences might be very limited;
 - (4) there might be no need for software or tools to manage the SMS; and
 - (5) the communication policy might be limited.

GM2 ORGH.MGM.200(b)(2) Management system

GUIDANCE FOR SMALL ORGANISATIONS ON BUILDING AN SMS

The GH organisation may use these guidelines extracted from ICAO Doc 10121 Ground Handling Manual:

'The principles of good SMS apply to all organizations, companies and operators irrespective of their size and complexity of operation. The four components and twelve elements of the ICAO SMS framework can be used appropriately for both large and small organizations alike. Scalability does not mean picking particular elements; all the elements are applicable but will vary in scale. The individual GH organisation should carry out an analysis of its activities to determine the right level of applicability and resource to manage its SMS. Even small GH Organisations could be involved in activities having significant safety risks or be affected by other organizations working around them.

For small organizations, the low volume of incidents and safety data will mean it is more difficult to identify trends. Other more qualitative means of assessing safety might be required such as safety meetings and collaborating with other service providers or industry representative bodies.

Further information on scalability can be found in Doc 9859 and the Safety Management International Collaboration Group's (SMICG) "SMS for small organizations".

The safety risk assessment and identification of the appropriate mitigation measures include the human-factor element.'

GM3 ORGH.MGM.200(b)(2) Management system

EMERGENCY RESPONSE PROCEDURES

- (a) When providing support as part of the emergency response plan (ERP) of an aircraft operator or an aerodrome operator, the GH organisation should ensure that its personnel are aware of their role and are trained adequately to provide the expected support.
- (b) It may also be the case that a GH organisation is involved in an emergency response even in the absence of an ERP of the aircraft operator, for example a non-scheduled flight, or a charter flight,

or a non-commercial flight. On the other hand, the organisation should consider whether it is liable to emergencies that are exclusively related to its own safety of services and how it should respond to them. Therefore, it is recommended that the GH organisation considers developing emergency procedures of its own, assigning clear roles for its personnel, ensuring their minimum training, and organising regular rehearsal exercises.

- (c) The obligation to follow the aircraft operator's emergency response plans, as per their agreement, remains applicable regardless of the GH organisation's own ERP.
- (d) The relevant requirements of Regulation (EU) 139/2014 continue to apply to the GH organisation as an aerodrome user.

GM1 ORGH.MGM.200(b)(2)(ii) Management system

HUMAN FACTORS AND SAFETY HAZARDS

This GM is based on ICAO Doc 10121 Ground Handling Manual.

- (a) The GH organisation should address the human factors as part of its SMS to optimise human performance within the system. This can be achieved by analysing the task, the individuals involved and the organisation, and how these can each impact safety behaviour.
- (b) The task or job should be designed with ergonomic principles taking into account typical human performance limitations, ensuring they are not overloaded and are able to carry out their tasks in all operational circumstances. The physical design of the workplace, its environment, the equipment and the mental abilities of the person to make decisions, as well as their perception of the task and risks, need to be considered.
- (c) Individuals have varying strengths and weaknesses related to their attitudes, skills and personalities.
- (d) An organisation's culture and organisational attitudes can have considerable influence on individuals and group behaviour. A positive culture should be established, as this promotes employee involvement and commitment at all levels and highlights where deviations from safe working practices is not acceptable.
- (e) The ground handling environment still relies heavily on people. However, as technical systems become more reliable, the remaining occurrences are largely related to human error.
- (f) Human factors or operator error have been identified by industry as being responsible for over 90 per cent of accidents involving damage to aircraft and infrastructure. Common causes of such accidents have been highlighted as poor training and supervision, failure to follow standard operational procedures, distraction and work pressure. As part of its SMS, the GH organisation should identify and target root causes related to human factors and take appropriate mitigating actions.
- (g) The 'Dirty Dozen'

There is a considerable amount of research and academic material on the subject of human factors. One commonly used concept is the 'Dirty Dozen'. The Dirty Dozen refers to 12 of the most common human error preconditions or conditions that can act as precursors to accidents or incidents. These 12 elements influence people to make mistakes. Since its introduction for aircraft maintenance in 1993, all areas of the aviation industry have found the Dirty Dozen a useful introduction to discussions into human error within their businesses, organizations and workplaces.

- (h) While the Dirty Dozen has increased awareness of how humans can contribute towards accidents and incidents, the aim of the concept is to focus attention and resources on reducing and capturing human error. There are examples of typical countermeasures designed to reduce the possibility of any human error causing a problem for each element. These 12 elements can cause people to make mistakes; however, the list is not exhaustive as there are over 300 elements in the Human Factors Training Manual (Doc 9683).
- (i) The GH organisation should conduct an analysis of the human factors aspects of their operations and organization. The Dirty Dozen concept is an efficient and simple methodology to conduct this analysis. The 12 elements are shown in Figure 1 below (see also Appendix G to ICAO Doc 10121 Ground Handling Manual):

1. Lack of communication	2. Distraction	3. Lack of resources	4. Stress
5. Complacency	6. Lack of teamwork	7. Pressure	8. Lack of awareness
9. Lack of knowledge	10. Fatigue	11. Lack of assertiveness	12. Norms <i>"the way we do things around here"</i>

- (j) The GH organisation should be aware of the issues when employing temporary, seasonal or third-party temporary staff. Some examples are but not limited to:
- (1) maintaining training competency;
 - (2) inexperienced staff working unsupervised; and
 - (3) infrequent use of equipment and procedures.
- (k) The GH organisation should consider maintaining an appropriate balance between temporary workers and full-time employees within the operational teams to ensure sufficient levels of experience and competency.

GM1 ORGH.MGM.200(b)(2)(iv) Management system

SAFETY CULTURE

- (a) The GH organisation should ensure that its processes developed under its management system aim at fostering a safety culture within its organisation. This should include at least the following:
- (1) Staff are encouraged to report essential safety-related information. However, there is a clear line drawn between acceptable and unacceptable behaviour. This helps building accountability.
 - (2) continuous development of personnel's technical competences through training, to ensure that they understand why particular safety actions are taken and why safety

- procedures are introduced or changed; also, so that staff become competent to draw conclusions from safety information systems, and be willing to implement safety changes;
- (3) open, consistent and transparent communication and information sharing among the GH personnel regarding safety aspects, horizontally among staff, and vertically (from management to front-line personnel and vice-versa);
 - (4) awareness of individual safety responsibility as part of a larger aviation system. Staff should become knowledgeable about various factors: human, technical and organisational, affecting the safety of the whole system;
 - (5) SMS training;
 - (6) training on safety data analysis and occurrence investigation to the personnel participating in such activities;
 - (7) communication sessions aiming at helping the GH personnel understand the main safety culture concepts and become aware of the following aspects:
 - (i) the importance of reporting,
 - (ii) the outcome of reporting (meaningful, visible result),
 - (iii) the potential safety consequences of not reporting,
 - (iv) the concept of just culture and reporter's protection,
 - (v) the difference between an inadvertent error/mistake/lapse and an intentional act/reckless conduct;
 - (vi) the importance of reporting errors on a voluntary basis and of sharing experiences;
 - (8) facilitation of safety reporting by using simple forms, easy to find, easy to fill in, easy to submit, and ensuring full anonymity. Consider the difficulty of reporting after/during a night shift, or a difficult shift (congested traffic, severe weather conditions, etc.). In unusual or emergency situations, staff can report directly to decision makers to allow a timely response. This builds flexibility and effectiveness of reporting;
 - (9) allocating sufficient resources to analyse the safety events, to identify the root causes, to provide feedback to reporters, to create a hazard register based on which to establish safety performance indicators to measure the safety objectives;
 - (10) ensuring full management involvement and support into these activities;
 - (11) involving front-line GH personnel and staff representatives in the investigation of an event;
 - (12) involving front-line personnel by asking them to provide input or feedback in developing or improving procedures.
- (b) The implementation steps should cover the aspect of communication and information sharing both within the GH organisation and with the other stakeholders involved in operation at an aerodrome: aircraft operator, aerodrome operator, ATC, AMS provider, and others, as the case may be (e.g., contracted service providers relevant to the safety of operation).
- (c) Review process for effectiveness of safety culture (including understanding by personnel).

GM2 ORGH.MGM.200(b)(2)(iv) Management system

STEPS TOWARDS BUILDING AND MAINTAINING A SAFETY CULTURE

The following are examples of how a GH organisation could implement the steps toward fostering a safety culture within its organisation:

(a) Communication on safety

- (1) Encourage staff to identify hazards, ask them to suggest solutions. Use open-ended questions to encourage discussion instead of questions that require only a 'yes' or 'no' answer.
- (2) Schedule debriefings of 10-15 minutes at the end of a day/shift to discuss with the whole team about how the activity went on, what was noticeable, different, outside an operational procedure, positive and negative aspects, whether something should be changed. It is important to understand why people do things the way they do. Listening is also very important.
- (3) Listen to staff's concerns, without being defensive. The purpose of a briefing is to have personnel start thinking about safety problems. Practical examples can be used in the talk.
- (4) Include any feedback from past briefings and report on follow-up action.
- (5) Ensure timely and effective dissemination of safety notices and safety information to all staff.
- (6) Arrange a 'display wall' in the briefing room, to post questions to the personnel, asking them for their opinion about changing an operational procedure; or informing about new changes coming from the industry standards that they apply, or the regulator, or ICAO.
- (7) Arrange competitions and games that aim at increasing awareness of safety or improving safety in the day-to-day activities.
- (8) Share feedback on disseminated results of reported events on a regular basis, in both formal and informal discussions/meetings.
- (9) Formal and informal discussions about safety culture concepts, such as 'error', 'mistake', 'intentional', 'non-intentional error', 'negligence', 'wilful misconduct', 'gross negligence', examples of 'crossing the line between error and negligence', etc.
- (10) Ongoing reviews of lessons learned from the organisation's own occurrence reports and safety surveys.
- (11) Positive re-enforcement (praise/thanks for appropriate behaviour).
- (12) Personalise safety outcomes (including health and safety).

(b) Training

- (1) Regular training and recurrent assessment to ensure that personnel are aware of all safety management practices and procedures applicable to their role.
- (2) Regular training and recurrent assessment to ensure that personnel are aware of their organisation's approach to safety.

GM3 ORGH.MGM.200(b)(2)(iv) Management system

GOOD PRACTICES IN BUILDING A SAFETY CULTURE

- (a) The following are examples of good practices to help an organisation build and maintain a safety culture:
- (1) There should be opportunities for management and operational staff as well as staff representatives to engage to discuss operational risks and promote a positive safety culture.
 - (2) The GH organisation's senior management should be aware of the top operational risks, "hotspots", and key safety objectives.
 - (3) Frontline staff executing daily operational tasks should be involved in safety activities including hazard identification, procedures development, and safety risk assessment and mitigation measures, to provide the operational background and context and ensure the just culture principle towards the personnel involved are observed.
 - (4) Senior management should be involved in safety culture promotion activities. One of the core safety culture messages to GH organisation staff is that by working safely and not taking risks, and by looking out for each other, everyone gets to go home safely at the end of the day.
 - (5) It is recommended that all levels of management are trained on safety, including safety culture.
 - (6) The GH organisation should undertake periodic assessments of safety culture.
 - (7) The GH organisation should develop a plan to address gaps and deficiencies identified during the safety culture assessment.
 - (8) Results of the assessments of personnel's safety culture and action plans should be communicated throughout the organisation.
 - (9) Staff should be empowered to address any safety concerns regarding unsafe operations via a non-punitive reporting system.
 - (10) Staff should always be given the equipment they need to work safely and encouraged to use appropriate safety protective equipment (e.g., personal protection equipment (PPE), ear protection, high visibility jackets, etc.).
 - (11) Staff should not feel pressure to come into work when unfit to do so.
 - (12) Standard operating procedures should be developed together with the GH personnel and relevant stakeholders.
 - (13) Staff should be enabled and encouraged to submit suggestions for improving processes and procedures to enhance safety.

GM4 ORGH.MGM.200(b)(2)(iv) Management system

SAFETY CULTURE AND JUST CULTURE

- (a) Just culture, as a component of the safety culture, operates with complex concepts. Therefore, it is important to consider the human factors in the way in which training to GH personnel is

provided to ensure its effectiveness. For example, complex concepts should be explained in simple terms and by using concrete and relevant examples from daily operation.

- (b) It is good practice that the GH organisation develops a just culture policy (ideally, a stand-alone document) that is formally endorsed by top management and staff representatives.
- (c) The GH organisation could refer to the European Corporate Just Culture Declaration.

SAFETY CULTURE INDICATORS

The GH organisation may use the following table containing safety culture characteristics and indicators to measure the maturity of safety culture in its organisation (from the NLR study [Aircraft Ground Handling and Human Factors](#), NLR-CR-2010-125):

Characteristic	Indicators
Commitment <i>(Reflects the extent to which every level of the organisation has a positive attitude towards safety and recognises its importance.)</i>	<ul style="list-style-type: none"> - Management concern - Personal concern - Investment in safety
Justness <i>(Reflects the extent to which safe behaviour and reporting of safety issues are encouraged or even rewarded, and unsafe behaviour is discouraged.)</i>	<ul style="list-style-type: none"> - Evaluation of (un)safe behaviour - Perception of evaluation - Passing of responsibility
Information <i>(Reflects the extent to which safety related information is distributed to the right people in the organisation.)</i>	<ul style="list-style-type: none"> - Safety training - Communication of safety related information - Safety reporting system - Willingness to report - Consequences of safety reports
Awareness <i>(Reflects the extent to which employees and management are aware of the risks the organisation's operations imply for themselves and for others.)</i>	<ul style="list-style-type: none"> - Awareness of job induced risks - Attitude towards unknown hazards - Attention for safety
Adaptability <i>(Reflects the extent to which employees and management are willing to learn from past experiences and are able to take whatever action is necessary to enhance the level of safety within the organisation.)</i>	<ul style="list-style-type: none"> - Actions after safety occurrences - Proactiveness to prevent safety occurrences - Employee input
Behaviour	<ul style="list-style-type: none"> - Job satisfaction - Working situation

(Reflects the extent to which every level of the organisation behaves so as to maintain and improve the level of safety.)

- Employee behaviour with respect to safety
- Mutual expectations and encouragement

GM1 ORGH.MGM.200(b)(4) Management system

CONSIDERATION OF FATIGUE IN PLANNING THE GROUND HANDLING ACTIVITIES

- (a) The way and the extent to which the GH organisation should consider the threat of fatigue in the planning of GH tasks and organising of shifts may vary from one organisation to another, depending on the type of GH activity and the operational context in which it is performed (where, when and by whom).
- (b) Fatigue is one example of human factors issues which should be considered by the management system, particularly for the planning activity. In this respect, where the organisation activity is prone to fatigue issues, the GH organisation should:
 - (1) ensure that the safety policy required by point ORGH.MGM.200(b)(2)(i) gives due consideration to the aspects of fatigue;
 - (2) ensure that the safety reporting system required by point ORGH.GEN.165 enables the collection of fatigue issues;
 - (3) ensure that the threat of fatigue is adequately considered by the management system key processes (e.g., assessment, management, monitoring);
 - (4) provide safety promotion material and adapt safety training accordingly.
- (c) When organising the shifts, the GH organisation should consider good practices in the GH domain and applicable rules. The resulting shift schedule should be shared with the GH personnel sufficiently in advance so they can plan adequate rest.
- (d) The GH organisation should have a procedure (including mitigations) to address cases where the working hours are going to be significantly increased, or when the shift pattern will be significantly modified, such as for urgent operational reasons. In cases not covered by that procedure, the organisation should perform a specific risk assessment and define additional mitigation actions, as applicable. Basic mitigations may include:
 - (1) additional supervision;
 - (2) use of additional rest breaks.

GM1 ORGH.MGM.200(b)(4) Management system

CONSIDERATION OF FATIGUE IN PLANNING GROUND HANDLING SHIFTS

Fatigue is one of the factors that may contribute towards errors when it is not properly considered as part of planning activities.

- (a) Fatigue may be induced by:
 - (1) the environment and conditions in which the work is carried out (e.g. noise, rain, high or low temperature, closed space, lifting/moving heavy items, working in uncomfortable positions e.g. in bending position, on knees, etc.);
 - (2) excessive hours of duty and shift working, particularly with multiple shift periods or patterns, additional overtime or night work.

- (b) Considering the threat of fatigue in the planning and organising of shifts refers to setting up the activities and the shifts in a way that enables the GH personnel to remain sufficiently free from fatigue so they can perform the planned activities safely, including:
- (1) including regular breaks in the working schedule, adjusted to the type of activity;
 - (2) providing rest periods of sufficient time to overcome the effects of the previous shift and to be rested by the start of the following shift;
 - (3) avoiding shift patterns that cause a serious disruption of an established sleep/work pattern, such as alternating day/night duties;
 - (4) planning recurrent extended rest periods and notifying the staff sufficiently in advance.

AMC1 ORGH.MGM.200(b)(6) Management system

COMPLIANCE MONITORING – INTERNAL AUDITS

- (a) Compliance monitoring process
- (1) The implementation and use of a compliance monitoring process should enable the GH organisation to monitor its compliance with the requirements of Annexes III and IV to this Regulation, as well as with any other applicable regulatory requirements and instructions and procedures established by the aerodrome operator or the aircraft operator to which GH services are provided.
 - (2) The compliance monitoring process should be properly implemented, maintained and continually reviewed and improved, as necessary.
 - (3) Compliance monitoring should include a method to provide feedback on the findings to the accountable manager to ensure effective implementation of corrective actions, as necessary.
 - (4) The GH organisation should monitor the consistent application of its operational procedures and compliance with the applicable procedures of the aircraft operators to which it provides services and the aerodrome operator of the aerodromes where it operates, to ensure that the activities are performed safely. In doing so, the GH organisation should, as a minimum, and where appropriate, monitor compliance of the following elements with the applicable requirements:
 - (i) its declaration;
 - (ii) its SMS;
 - (iii) its documents and records system, including the ground handling manual;
 - (iv) compliance with the procedures for local operation contained in the aerodrome manual that are applicable to the GH organisation;
 - (v) the GSE maintenance programme;
 - (vi) the activities of the organisation carried out under the supervision of the person(s) nominated in accordance with point ORGH.MGM.210(b)(3);
 - (vii) any outsourced activities in accordance with ORGH.MGM.205, for compliance with the contract.
- (b) Organisation set-up
- (1) The accountable manager, as directly accountable for safety, should ensure, in accordance with ORGH.MGM.210(a), that sufficient resources are allocated for

compliance monitoring. When the person responsible for compliance monitoring also acts as safety manager, the accountable manager should ensure that sufficient resources are allocated to both functions, taking into account the size of the GH organisation and the complexity of its activities.

- (2) The independence of the compliance monitoring function should be established by ensuring that audits and inspections are not carried out by personnel responsible for the function, process or procedure being audited.
 - (3) Personnel involved in compliance monitoring should have access to any part of the GH organisation and any contracted organisation, as required.
- (c) Compliance-monitoring documentation
- (1) Relevant documentation should include the relevant part(s) of the GH organisation's management system documentation.
 - (2) In addition, relevant documentation should also include the following:
 - (i) terminology;
 - (ii) specified activity standards;
 - (iii) a description of the organisation;
 - (iv) the allocation of duties and responsibilities;
 - (v) procedures to ensure regulatory compliance;
 - (vi) the compliance monitoring programme, reflecting:
 - (A) the schedule of the monitoring programme;
 - (B) audit and inspection procedures including an audit plan that is implemented, maintained, and continually reviewed and improved;
 - (C) reporting procedures;
 - (D) route-cause analysis for the findings identified during internal compliance-monitoring activities;
 - (E) follow-up and corrective action procedures; and
 - (F) the recording system.
 - (vii) the training syllabus referred to in (d)(2);
 - (viii) document control.
- (d) Training
- (1) To achieve optimum outcome of such training, the GH organisation should ensure that all personnel understand the training objectives as laid down in the organisation's management system documentation.
 - (2) The persons responsible for the compliance monitoring function should receive training in this function. Such training should cover the compliance-monitoring requirements, the manuals and procedures related to the tasks, audit techniques, root-cause analysis, reporting, and recording.
 - (3) The allocation of time and resources should be based on the volume and complexity of the activities concerned.
- (e) Compliance monitoring – audit scheduling

- (1) The GH organisation should establish audit schedules to be completed during a specified period, as well as a periodic review cycle for each audited area. The compliance monitoring itself should also be audited according to a defined audit schedule. The schedule should allow for unscheduled audits when non-compliance data show an increasing trend. Follow-up audits should be scheduled to verify that corrective action has been carried out, and that it has been effective and completed, in accordance with the policies and procedures specified in the ground handling manual.
- (2) The management system's key processes, procedures and the operation of the GH organisation should be audited within the first 12 months from the date when the declaration was first registered.
- (3) Following that, the GH organisation should consider the results of its safety risk assessments and past compliance-monitoring activities in order to adapt the planning cycle for its compliance-monitoring activities, to cover its management system's key processes, procedures, training, and operations. This planning cycle should not exceed 36 months or the duration of the oversight planning cycle established by the competent authority for each organisation, whichever is shorter.
- (4) The results relevant to safety of the provision of services and compliance with the GH Regulation should be included in the organisation's annual internal review and activity report in accordance with ORGH.MGM.202. In its turn, the compliance monitoring process should include, when relevant, data prepared for and included in the annual internal review and activity report.

GM1 ORGH.MGM.200(b)(6) Management system

COMPLIANCE MONITORING — GENERAL

- (a) The organisation set-up of the compliance monitoring should reflect the size of the GH organisation and the complexity of its activities. The person(s) responsible for compliance monitoring may perform all audits and inspections themselves or appoint one or more auditors by choosing personnel having the related competence as defined in paragraph (a)(2) of AMC1 ORGH.MGM.210(c)(1) either from within or outside the GH organisation.
- (b) Regardless of the option chosen, the independence of the audit function should not be affected, in particular in cases where those persons performing the audit or inspection are also responsible for other functions for the GH organisation.
- (c) When compliance audits or inspections are performed by external personnel:
 - (1) any such audits or inspections should be performed under the responsibility of the person(s) responsible for the compliance monitoring; and
 - (2) the GH organisation remains responsible to ensure that the external personnel have relevant knowledge, background, and experience as appropriate to the activities being audited or inspected, including knowledge and experience in compliance monitoring.
- (d) The GH organisation retains the ultimate responsibility for the effectiveness of compliance monitoring, in particular for the effective implementation and follow-up of all corrective actions.

GM2 ORGH.MGM.200(b)(6) Management system

COMPLIANCE MONITORING, SMALL GH ORGANISATIONS

- (a) Compliance monitoring audits and inspections may be documented on a 'Compliance Monitoring Checklist', and any findings recorded in a 'Non-compliance Report'. The following documents may be used for this purpose.
- (b) The elements to be checked for the GH activity should be the same as the steps of the operational procedure that is applied for that activity.

COMPLIANCE MONITORING CHECKLIST			
Year:			
Subject	Date checked	Checked by	Comments/Non-compliance Report No.
GH activity			
Instructions for the provision of the GH service			
Dangerous goods instructions, if applicable			
Training			
Training records updated and accurate			
Current qualification			
Any additional licence (e.g., security, driving)			
Recurrent training, as applicable			
Refresher training, as applicable			
Documentation			
Ground handling manual updated and correctly amended			
Latest regulation amendments are included			
Operator procedures and aerodrome procedures are included and are current			
Declaration is current and valid			
Management of changes is current and documented			
Safety risk register completed			
GSE maintenance, if applicable			
GSE maintenance programme is current and accurate			
Out-of-service GSE correctly and visibly labelled			
Preventive maintenance completed			

NON-COMPLIANCE REPORT N°		
To Compliance Monitoring Person	Reported by:	Date:
Category: GH activity <input type="checkbox"/> Training <input type="checkbox"/> GSE maintenance <input type="checkbox"/> Safety management <input type="checkbox"/> Documentation <input type="checkbox"/>		
Description:		Reference:
Level of finding:		
Root-cause of non-compliance:		
Suggested correction:		
Compliance monitoring person:		
Corrective action required: <input type="checkbox"/> Corrective action not required: <input type="checkbox"/>		
Responsible person:	Time limitation:	
Corrective action:	Reference:	
Signature responsible person:	Date:	
Compliance monitoring person:		
Correction and corrective action verified: <input type="checkbox"/> Report closed: <input type="checkbox"/>		
Signature compliance monitoring person	Date:	

AMC1 ORGH.MGM.200(d) Management system

INTEGRATED MANAGEMENT SYSTEM

To enable the implementation of an integrated management system, the organisation should identify the following elements in its structure and documentation:

- (a) the organisations certified, approved, authorised, or declared under Regulation (EU) 2018/1139 and its delegated and implementing acts that are covered by its management system. For example: an aircraft operator holding an air operator certificate or declaring its activities as an NCC or SPO operator; a provider of apron management services declaring its activities; or a certified aerodrome operator.
- (b) the domains that are integrated in its management system, with the proper interfaces that enable effective functioning and communication between them; and
- (c) applicable requirements for each domain.

GM1 ORGH.MGM.200(d) Management system

INTEGRATED MANAGEMENT SYSTEM

- (a) Organisations should embed safety management and risk-based decision-making into all their activities, instead of superimposing another system onto their existing management system and governance structure. In addition, if the organisation holds multiple organisation certificates that are issued under Regulation (EU) 2018/1139, it may choose to implement a single management system to cover all of its activities. An integrated management system may be used not only to capture multiple management system requirements resulting from Regulation (EU) 2018/1139, but also to cover for other regulatory provisions requiring compliance with ICAO Annex 19 or for other business management systems, such as security, occupational health, and environmental management systems. Integration will remove duplication and exploit synergies by managing safety risks across multiple activities. Organisations may determine the best means to structure their management systems to suit their business and organisational needs.
- (b) Aerodrome operators providing GH services and aircraft operators performing self-handling are not expected to duplicate their already existing management systems for compliance with this Regulation.
- (c) The organisations mentioned in point (b) should only revise their existing management system to cover the new elements required by this Regulation, in particular:
 - (1) safety policy and the safety risk management process,
 - (2) compliance monitoring function,
 - (3) duties and responsibilities of the GH personnel,
 - (4) interfaces with the other activities performed by the organisation,
 - (5) the training programme of the personnel performing GH activities,
 - (6) ground handling processes and procedures,
 - (7) documents and records,
 - (8) the policy on the management of changes,
 - (9) the maintenance programme for the GSE.

AMC1 ORGH.MGM.202 Annual internal review and activity report**PURPOSE AND CONTENT OF THE ANNUAL INTERNAL REVIEW AND ACTIVITY REPORT**

- (a) The annual internal review should consist of an assessment whether the GH organisation safely and effectively carries out the declared tasks and responsibilities.
- (b) The annual activity report submitted by the GH organisation to its competent authority for the purpose of point ARGH.OVS.305(e) should contain information on the following aspects:
 - (1) increase or decrease in the volume of GH activities performed over the year;
 - (2) availability of sufficient resources;
 - (3) assessment of the safety performance indicators, mitigations taken as a result of the reports;
 - (4) changes to the safety policy, safety objectives, safety performance indicators, safety risk levels;
 - (5) number of mandatory and voluntary safety reports received within its organisation; GH activity being subject to reporting;
 - (6) assessment of the training programme for their adequacy and currency (initial, refresher, recurrent);
 - (7) number of audits performed by industry third parties, the name of the organisations performing them and the scope of audits;
 - (8) evaluation of adequacy and effectiveness of follow-up and corrective actions taken after non-compliances that have been detected as part of the compliance monitoring function.

AMC2 ORGH.MGM.202 Annual internal review and activity report**ANNUAL INTERNAL REVIEW AND ANNUAL ACTIVITY REPORT FOR SMALL GH ORGANISATIONS**

- (a) The annual internal review should consist of an assessment whether the GH organisation safely and effectively carries out the declared tasks and responsibilities.
- (b) The annual internal review should feed the compliance monitoring report. However, it is not expected that the annual internal review covers the full scope of the compliance monitoring process.
- (c) The annual activity report submitted by a small GH organisation to its competent authority for the purpose of point ARGH.OVS.305(e) should contain information on the following aspects:
 - (1) increase or decrease in the volume of GH activities performed over the year;
 - (2) availability of sufficient resources;
 - (3) changes to its assessment of the safety targets, mitigations taken to the identified safety risks, as documented in its safety risk register;
 - (4) number of mandatory and voluntary safety reports generated by the organisation;
 - (5) any training sessions (initial, recurrent or refresher) to its personnel;
 - (5) number of audits performed by other parties and the name of the organisations performing them;

- (8) evaluation of adequacy and effectiveness of follow-up and corrective actions taken after non-compliances that have been detected as part of the compliance monitoring function.

AMC1 ORGH.MGM.205 Contracted services

RESPONSIBILITIES WHEN CONTRACTING SERVICES

- (a) The GH organisation may decide to contract certain activities included in the scope of its declaration to third-party service providers, including to other GH organisations.
- (b) A written agreement should exist between the GH organisation and the contracted service provider, that clearly defines at least the contracted services and the responsibilities of both parties.
- (c) The GH organisation should include the contracted safety-related activities relevant to the agreement in its safety management and compliance monitoring programmes.
- (d) The GH organisation should ensure that the contracted organisation has the necessary authorisation or approval to provide those services, as required, its products comply with the recognised industry standards, and commands the resources and competence to undertake the task.
- (e) The GH organisation should notify the aerodrome operator or the aircraft operator concerned, where relevant, of any services carried out by third parties on its behalf.

GM1 ORGH.MGM.205 Contracted services

THIRD-PARTY SERVICE PROVIDER

- (a) It is recommended that the GH organisation considers, when selecting the providers of contracted services, relevant references and criteria such as safety and security aspects, or whether the safety culture in the contracted organisation is commensurate with the one in its own organisation, to ensure safety of its own operation.
- (b) If the contracted service is a GH service as identified in Article 1 of the GH Regulation, then the provider of those services is bound to comply with this Regulation.

AMC2 ORGH.MGM.205 Contracted services

AUDITS PERFORMED BY A THIRD-PARTY AUDITOR

- (a) The GH organisation may contract a third-party service provider to perform its internal audits and inspections as part of its compliance monitoring responsibilities, in accordance with ORGH.MGM.200(b)(6). In such a case, the GH organisation should ensure the following:
- (1) a documented arrangement has been established with the third-party auditor;
 - (2) the audit standards applied by the third-party auditor address the scope of this Regulation in sufficient detail;
 - (3) the audit applies an evaluation system designed to assess the operational, management and control systems of the GH organisation;
 - (4) the third-party auditor and its evaluation system are independent, and the auditors are impartial;

- (5) the auditors are appropriately qualified and have sufficient knowledge, experience and training, including on-the-job training, to perform their allocated tasks;
 - (6) audits are performed on-site;
 - (7) access of the third-party auditor to the relevant data and facilities is granted to the level of detail necessary to verify compliance with the applicable requirements;
 - (8) the GH organisation is granted access to the full audit report;
 - (9) procedures have been established for monitoring continued compliance of the organisation with the applicable requirements; and
 - (10) procedures have been established to notify the GH organisation of any non-compliance with the applicable requirements, the corrective actions to be taken, the follow-up of these corrective actions, and closure of findings.
- (b) The full audit report of the third-party provider should be made available to the competent authority upon request.

AMC1 ORGH.GEN.210 Personnel

COMBINATION OF FUNCTIONS

- (a) Cumulation of several functions into one person, including combination with the position of an accountable manager, should depend on the size of the organisation and scale of its operation. The two main conditions that should be met are competence of the individuals and their capacity to meet the assigned responsibilities.
- (b) As regards competence in different areas of responsibility, there should not be any difference from the requirements applicable to persons holding only one post.

GM1 ORGH.GEN.210 Personnel

NOMINATED PERSONS

The smallest GH organisation that can be considered is the one-person organisation, where all nominated functions are filled by the accountable manager, and audits for compliance monitoring are conducted by an independent person.

AMC1 ORGH.MGM.210(b)(1) Personnel

SAFETY MANAGEMENT FUNCTION

- (a) The safety management function should cover the following aspects:
 - (1) act as a focal point for the safety aspects of the GH activities, as per ICAO Doc 9859 (Ch. 9.3.6);
 - (2) monitor safety concerns in aviation industry;
 - (3) coordinate and communicate with the competent authority;
 - (4) facilitate hazard identification, risk analysis and management;
 - (5) monitor and, when required, ensure the implementation of actions taken to mitigate risks, as listed in the safety action plan;

- (6) provide periodic reports on safety performance;
 - (7) ensure maintenance of safety management documentation;
 - (8) ensure that there is safety management training available and that it meets acceptable standards;
 - (9) provide independent advice on safety matters;
 - (10) ensure initiation and follow-up of internal occurrence investigations;
 - (11) assess the risks related to changes affecting the main elements of the declaration.
- (b) For GH organisations above 10 FTE, the safety management function should be independent from the operational line management.

AMC2 ORGH.MGM.210(b)(1) Personnel

SAFETY MANAGER TRAINING, SKILLS AND QUALIFICATIONS

The GH organisation should ensure that the persons responsible for the safety management function are trained in the following areas:

- (a) any of the GH operations listed in Article 2 of the GH Regulation
- (b) human factors
- (c) SMS:
 - (1) Monitoring safety performance
 - (2) Conducting risk assessments
 - (3) Managing the safety information database (system)
 - (4) Investigation of reportable matters and hazardous events
 - (5) Safety promotion/communication methods
- (d) Soft skills, computer literacy
 - (1) Communication skills
 - (2) Computer skills (word-processing, spreadsheets, database management).

AMC1 ORGH.MGM.210(c)(1) Personnel

COMPLIANCE MONITORING FUNCTION

- (a) The compliance monitoring function should be responsible to ensure that the compliance-monitoring process established in accordance with ORGH.MGM.200(b)(6) is properly and consistently implemented and continued compliance with the applicable regulatory requirements.
 - (1) If more than one person is appointed for the compliance monitoring function, the accountable manager should identify the person who acts as the unique focal point (i.e., the 'compliance monitoring manager').
 - (2) The person(s) responsible for compliance monitoring should:

- (i) be able to demonstrate relevant knowledge, background and appropriate experience in GH operations and knowledge and experience in compliance monitoring;
 - (ii) have knowledge of the applicable requirements in the GH domain; and
 - (iii) have access to all parts of the GH organisation and, as necessary, any contracted service provider.
- (3) In a small GH organisation, this function may be executed by the accountable manager if the accountable manager complies with points (2)(i) and (ii).
- (4) If the same person cumulates the compliance monitoring function and the safety management function, the accountable manager should ensure that sufficient resources are allocated to both functions, considering the size of the organisation and the complexity of its activities.
- (5) The independence of the compliance monitoring function should be established by ensuring that audits and inspections are carried out by personnel not responsible for the function, procedure or products being audited.

AMC1 ORGH.MGM.210(f) Personnel

SUFFICIENT PERSONNEL

The GH organisation should consider ensuring back-up personnel in high-peak periods where the number of aircraft to be serviced are expected to be above the average level for which the GH organisation is prepared.

GM1 ORGH.MGM.210(f) Personnel

PLANNING SUFFICIENT PERSONNEL FOR SAFE PROVISION OF GH SERVICES

- (e) To determine an appropriate number of qualified personnel as sufficient to ensure safe GH services, the GH organisation should perform a task and resource analysis. It may consider several aspects such as but not limited to:
- (1) type of GH service provided as per the declaration, planned tasks,
 - (2) number of stations covered,
 - (3) peak seasons,
 - (4) number of aircraft operators to which it provides services,
 - (5) estimate number of ad-hoc requests for GH services per season,
 - (6) size of the GSE park to be operated,
 - (7) any contracted GH services to third parties.
- (b) The GH organisation may also decide to consult with the aerodrome operator to determine more accurately the number of sufficient personnel for the provision of GH services for a particular season or scheduled operations.

AMC1 ORGH.MGM.215 Facilities

STORAGE AREA FOR DANGEROUS GOODS

The GH organisation should ensure that the storage area for dangerous goods meets the following conditions:

- (a) A map of the storage facility is provided at all storage facilities and dangerous goods acceptance areas, indicating the following:
 - (1) purpose of the storage facility: classes and divisions of dangerous goods to be stored,
 - (2) storage area for temporary or long-term storage of dangerous goods, with visible markings for separation, such as, e.g., visible paint, or red-and-white-striped ribbon.
 - (3) if applicable, the loading/unloading point from/to ULD or build-up of ULDs,
 - (4) public area or airside safety (restricted) area,
 - (5) entrance, exit, transit area to the storage facility/warehouse,
 - (6) dangerous goods acceptance area,
 - (7) if applicable, X-ray equipment positioning,
 - (8) positioning of the dangerous goods emergency kits, fire extinguishers.
- (b) Any necessary approvals from other State entities are obtained in advance, e.g., environmental protection, emergency response, any approval for, e.g., explosive or radioactive dangerous goods, etc.
- (c) Dangerous goods emergency toolkit including fire extinguishers available at the location and instructions to use it.
- (d) Special storage conditions should be ensured for dangerous goods that require special temperature control.
- (e) Segregation of dangerous goods should be ensured in accordance with the ICAO TI.

DANGEROUS GOODS ACCEPTANCE POINT

The GH organisation should ensure the following:

- (f) The acceptance point is located as close as possible to the storage facility and properly marked as dangerous goods acceptance point.
- (g) A copy of the dangerous goods international standards and recommended practices is available at the acceptance point.
- (h) Availability of the following:
 - (1) weighing and measuring devices, including, if applicable, for measuring radioactivity;
 - (2) spare dangerous goods labels and other markings;
 - (3) fire extinguisher(s);
 - (4) a place or container (platform, larger box, tray) where the dangerous goods item can be inspected for damage or leakages upon acceptance and where any leakages can be contained;
 - (5) emergency response procedures are easy to access or displayed in a visible location.

- (i) The area where documents are kept (dangerous goods acceptance checklist, airway bill, shipper's declaration, etc.) should be easily accessible to the authorised personnel.

AMC2 ORGH.MGM.215 Facilities

DANGEROUS GOODS EMERGENCY TOOLKIT

The dangerous goods storage facility should be equipped with equipment and an emergency toolkit which should contain the following materials as a minimum:

- (a) Hydrants,
- (b) Extinguishers specific to the dangerous goods in storage,
- (c) Emergency toolkits:
 - (1) sandbox,
 - (2) industrial spillage absorbents of various kinds, depending on the dangerous goods in storage,
 - (3) brooms, shovels, brushes, etc., to spread/ the sand or absorbent material,
 - (4) plastic bags of various sizes,
 - (5) rubber gloves, gloves to protect against corrosive material or fire,
 - (6) rubber boots and/or special (protection) boots,
 - (7) protective masks and goggles,
 - (8) protective overalls,
 - (9) medical kits for rapid general intervention (cleaning solutions for eyes, hands, etc.)
 - (10) salvage packaging or other resistant barrels or similar for temporary storage of damaged dangerous goods packages.

GM1 ORGH.MGM.215 Facilities

DANGEROUS GOODS STORAGE FACILITY

- (a) To determine the location of the storage facility used for dangerous goods, the GH organisation should consider any additional safety mitigations to address the geographical positioning and distance from public areas (e.g., mountainous area, hill, flat area, predominant direction of the wind, area with high risk for seismic actions, populated settlements nearby, buildings, lakes, rivers, etc.)
- (b) It is recommended to store the dangerous goods items on two-story levels so as to enable the following:
 - (1) easy visual access to all stored items, and
 - (2) easy handling of items stored at the upper level and heavy packages at ground level.

GM1 ORGH.MGM.220 Software equipment

SOFTWARE EQUIPMENT

- (a) Any of the software equipment is in the scope if it endangers the safety of a flight in case of malfunction. The list of software for the following activities or processes is not exhaustive:
- (1) departure control system (DCS),
 - (2) turnaround coordination,
 - (3) de-icing/anti-icing documentation or holdover-time tables,
 - (4) ramp resource planning,
 - (5) driving and operation of autonomous vehicles,
 - (6) ground supervision,
 - (7) baggage and cargo sorting, processing/preparing for loading,
 - (8) processing and documenting cargo or dangerous goods or load control documentation;
 - (9) any other operational software used by the GH organisation for the provision of GH services.
- (b) Before using new software equipment, the GH organisation should ensure, when feasible, they have been properly tested for use in an aviation environment, are robust enough for use in daily operation and do not pose a risk to the safety of operations.
- (c) The software should be tested to ensure it is fully functional following software updates.

GM1 ORGH.MGM.220(b) Software equipment

AUTHORISED PERSONS

The term 'authorised persons' is used in relation to the following purposes, in compliance with the applicable data protection requirements:

- (a) GSE maintenance,
- (b) safety management,
- (c) training,
- (d) cybersecurity,
- (e) inspection or occurrence investigation.

SUBPART DEC — DECLARATION

AMC1 ORGH.DEC.100 Declaration

SUBMITTING A DECLARATION

- (a) The GH organisation should submit its declaration or the amended declaration at least 10 working days before starting the operation or before the changes indicated in the amended declaration become effective.
- (b) It is the responsibility of the GH organisation to ensure the declaration has been successfully submitted to the competent authority. If the organisation does not receive an acknowledgement of receipt of the declaration from the competent authority as indicated in ARGH.OVS.320 and AMC1 ARGH.OVS.320, it should contact the competent authority to investigate whether the declaration has been received.

GM1 ORGH.DEC.100 Declaration

GENERAL

The intent of a declaration is to:

- (a) Have the GH organisation acknowledge its responsibilities under the applicable safety regulations and that it holds all necessary authorisations that may be required by local or national authorities for compliance with other applicable requirements (e.g., Council Directive 96/67/EC applicable at some EU aerodromes);
- (b) Inform the competent authority of the existence of a GH organisation; and
- (c) Enable the competent authority to fulfil its oversight responsibilities in accordance with Subpart ARGH.OVS.

AMC1 ORGH.DEC.105 Termination of the provision of ground handling services

NOTIFICATION

The prior notice for the notification of terminating the provision of GH services at an aerodrome should be made with sufficient time in advance to enable the aerodrome operator to take appropriate measures for the continuation of the service at that aerodrome, if necessary.

SUBPART DOC — DOCUMENTS AND RECORDS

AMC1 ORGH.DOC.100 Documents and records

GENERAL

- (a) Documents and records may be kept in paper or electronic format, or a combination of both.
- (b) Documents and records in paper format should withstand normal handling and filing. Computer systems should have at least one backup system.
- (c) In case of changes to hardware or software of records, the GH organisation should ensure that all necessary data continues to be accessible at least through the full period specified in ORGH.DOC.105.
- (d) The retention period for records starts when the record has been created or last amended.

GM1 ORGH.DOC.100 Documents and records

DATA BACKUP

The GH organisation should try, whenever possible, to ensure that all computer hardware used for data backup is stored in a different location from that containing the working data and in an environment that ensures they remain in good condition.

GM1 ORGH.DOC.110 Ground handling manual

GROUND HANDLING MANUAL

- (a) Organisations may use different names for this manual, as the concept is not new. Depending on the type of organisation that provides ground handling services, this document may have different names, such as 'ground operations manual', 'aerodrome manual', 'operations manual', 'ground service manual', 'ground handling service manual', etc., while they all refer to the same document.
- (b) The ground handling manual is a generic name for the sum of documents, a manual or a set of manuals and documents used by the GH organisation to support it in discharging its responsibilities for the safe provision of ground handling services in compliance with the applicable requirements. It contains all necessary instructions, information, procedures and training for the provision of services, the management system of the provider, and for its personnel to perform their duties, as well as for the operation and maintenance of the ground support equipment used.
- (c) If the provider of GH services already has an Operations Manual (OM) or an aerodrome manual (ADRM) under its existing management system, then its manual only needs to be amended to incorporate the GH specific elements. The organisation can decide how to organise its manual, whether it intends to have a single manual to include all procedures and mandatory elements of all the organisations included in its management system or issue separate parts for each of them.

GM2 ORGH.DOC.110 Ground handling manual

ACCEPTABLE CONDITION OF A GROUND HANDLING MANUAL

The acceptable condition of a ground handling manual implies the following elements that consider the human factors principles. The list is not exhaustive:

- (a) it is legible, the layout is clear, the content is organised in a logical way,
- (b) the text and pictures, diagrams or charts are unambiguous, meaning that they do not leave room for interpretation,
- (c) the language is concise, coherent and easy to understand,
- (d) abbreviations and acronyms are spelled out in a list included in the document where they are used,
- (e) charts and diagrams are clear and easy to follow,
- (f) if colour codes are used, ensure they are explained in the manual and easy to spot out;
- (g) if any parts of the ground handling manual are translated, ensure that the translations do not contain operational errors that might jeopardise safety and they are up-to-date,
- (h) symbols are explained.

AMC1 ORGH.DOC.110 Ground handling manual

GENERAL

- (a) The ground handling manual or parts of it may be presented in any form, including electronic form. In all cases, the GH organisation should ensure the manual is accessible, usable, and reliable.
- (b) The ground handling manual should be such that:
 - (1) all parts of the manual are consistent and compatible in form and content;
 - (2) the manual can be easily revised;
 - (3) the parts that address the GH specific processes and activities are clearly marked or separated so as not to be confused with other parts applicable to other domains if the organisation applies an integrated management system and holds other certificates or approvals or declares performing other activities in the scope of Regulation (EU) 2018/1139;
 - (3) the content and revision status of the manual is controlled and clearly indicated.
- (c) The ground handling manual should include a description of its amendment and revision process specifying:
 - (1) the person(s) who may approve amendments or revisions;
 - (2) the conditions for temporary revisions and/or immediate amendments, or revision required in the interest of safety; and
 - (3) the methods by which all personnel and organisations, including the service providers contracted by the GH organisation and performing GH tasks, are advised of changes to the manual.

- (d) The ground handling manual content may be based on, or refer to, industry standards and good practices.
- (e) The ground handling manual may contain parts of, or refer to, other relevant controlled documents. If the GH organisation chooses to use material from another source, either the applicable material should be copied and included directly in the relevant part of the ground handling manual, or the ground handling manual should contain a reference to the appropriate section of that applicable material.
- (f) A translated version of the relevant parts of the ground handling manual is an accepted means to comply with the related relevant requirements. In any case, the persons who will use the manual or its translated parts should be able to read and understand them. The GH organisation should ensure that the translated version is always the most recent version of that document.
- (g) The content of the ground handling manual should be reviewed for any necessary updates no later than every 24 months to ensure it remains current.

AMC2 ORGH.DOC.110 Ground handling manual

CONTENT

- (a) The ground handling manual should cover the following main topics, either in a single document or in several documents which are cross-referenced with one another. The order and numbering of the topics listed below may vary:
 - (0) Administration and control of the ground handling manual
 - (1) Management system of the GH organisation
 - 1.1 Organisation structure, including accountability and responsibilities
 - 1.2 Personnel
 - 1.3 Description of the management system, including:
 - 1.3.1 Safety management system, including emergency response procedures of the aircraft operator(s) and aerodrome operator(s)
 - 1.3.2 Management of changes
 - 1.3.3 Compliance monitoring process, including an audit programme and procedure for continuous improvement
 - 1.3.4 Procedures for reporting to the competent authority and other organisations, including notifying, and reporting accidents, serious incidents, occurrences and near-misses and sharing safety-relevant information
 - 1.3.5 Procedures related to the consumption of alcohol, psychoactive substances and medicines
 - 1.3.6 Documentation system
 - 1.4 Contracted services – safety assurance of contracted services to organisations not subject to a certification, declaration or authorisation regime under an (EU) aviation regulation
 - (2) Qualification and training and assessment programme of GH personnel
 - 2.1 Identification and description of training standards and objectives
 - 2.2 Required qualification/competencies for each GH function

- 2.3 A process for training needs analysis
- 2.4 The training and assessment programme per GH role
- 2.5 Additional training, as applicable per GH role
- 2.6 Conditions for trainers and continuing assessors
- (3) Standard operational procedures and other guidance or instructions, per type of GH service provided, including:
 - 3.1 procedures and instructions of the GH organisation,
 - 3.2 procedures and instructions of the aerodrome operator,
 - 3.3 procedures and instructions of the aircraft operator(s),
 - 3.4 airside safety.
- (4) Ground Support Equipment (GSE)
 - 4.1 Operation of GSE including safety elements,
 - 4.2 Maintenance programme,
 - 4.3 Maintenance and repair instructions,
 - 4.4 Servicing information, troubleshooting and inspection procedures
- (5) Dangerous goods instructions per each function involved in the handling of dangerous goods
- (6) Security procedures
- (b) The standard operational procedures mentioned in point 3 of the ground handling manual should cover the following GH operations, as applicable, depending on the services provided by the GH organisation:
 - 1. Passenger handling
 - 2. Baggage handling
 - 3. Aircraft servicing
 - 3.1 Safety on the apron/Ramp safety and operation of GSE and other vehicles used for GH services
 - 3.2 Hand signals for GSE
 - 3.3 Aircraft refuelling and defueling, i.e., into-plane fuelling services at the aerodrome
 - 3.4 Aircraft toilet servicing
 - 3.5 Potable water servicing
 - 3.6 Aircraft cleaning
 - 3.7 Aircraft de-icing and anti-icing
 - 3.8 Safe operations in adverse weather conditions
 - 4. Turnaround activities
 - 4.1 Aircraft arrival
 - 4.2 Aircraft chocking
 - 4.3 Aircraft coning

- 4.4 Aircraft access doors
 - 4.5 Aircraft loading and unloading
 - 4.6 Aircraft departure
 - 4.7 Aircraft pushback
 - 4.8 Aircraft towing
 - 4.9 Aircraft long-term parking
 - 5. Load control process
 - 5.1 Principles
 - 5.2 Tasks
 - 5.3 Responsibilities
 - 5.4 Load control process, operational procedures including mass and balance calculations and load planning,
 - 5.5 Messages and communications procedures
 - 5.6 Documentation
 - 6. Ground supervision function
 - 7. Cargo operations
- (c) The interfaces with the aerodrome operator and the aircraft operator should be highlighted in each section where they are developed.

GM1 ORGH.DOC.110(d) Ground handling manual

OTHER RELEVANT CONTROLLED DOCUMENTS

- (a) Other relevant controlled documents that the GH organisation may use to develop its ground handling manual could be those developed by various organisations, such as ICAO, EASA, the competent authorities, the aerodrome operators, the aircraft operators, the aircraft manufacturers, the GSE manufacturers, or documents such as industry standards or manuals published by industry associations and organisations.
- (b) Examples of documents that may be used (the list is non-exhaustive):
 - (1) ICAO Annexes, Documents, Manuals
 - (2) The aerodrome operator manual of the aerodromes where the GH organisation provides services
 - (3) The aircraft operator' operations manual
 - (4) De-icing manual
 - (5) Aircraft fuelling manual
 - (6) IATA documents and standards such as:
 - (i) IATA Ground Operations Manual (IGOM)
 - (ii) Airport Handling Manual (AHM)
 - (iii) Dangerous Goods Regulations (DGR)
 - (iv) Cargo Handling Manual (ICHM)

- (v) Unit Load Device (ULD) Regulations (ULDR)
- (vi) ULD manufacturer manuals, ULD Serviceability Checksheet
- (vii) Live Animals Regulation (LAR)
- (viii) Perishable Cargo Regulations (PCR)
- (7) IBAC documents and standards for ground handling provided to business aviation operators,
- (8) SAE standards for de-/anti-icing of aircraft on ground,
- (9) Good-practice documents developed by the Ground Handling Operations Safety Team (GHOST),
- (10) Safety Stack operational procedures used at an aerodrome,
- (11) GSE manufacturer manuals.

SUBPART TRG — TRAINING OF GROUND HANDLING PERSONNEL

AMC1 ORGH.TRG.100 Training programme

TRAINING PROGRAMME FOR SMALL GH ORGANISATIONS

- (a) A small GH organisation should ensure that its personnel receive training based on the tasks and safety objectives associated to their role.
- (b) The training should be based on the operational procedures applied by individuals in the daily operation and should include as applicable, specific instructions of the aircraft operator and the aerodrome operator.
- (c) Practical training may be replaced by on-the-job training, where the individual may perform the assigned tasks under supervision.
- (d) The training should be completed with a final assessment of the individual's competence to perform the assigned tasks in accordance with the standards and safety objectives and ensure an error-free learning.
- (e) Training to ensure continued competence should be provided, as applicable, in accordance with ORGH.TRG.100(c).
- (f) The training may be provided internally or by a third-party training provider.

GM1 ORGH.TRG.100(a) Training programme

TEMPORARY AND LEASE GH PERSONNEL

The GH temporary and lease personnel are included in the scope of ORGH.TRG.100.

AMC1 ORGH.TRG.100(b);(c) Training programme**TRAINING AND ASSESSMENT PROGRAMME**

- (a) The training and assessment programme should be flexible enough to cater for specific needs related to the delivery method such as distant learning, online training, or part-time training.
- (b) The training and assessment may be done either internally by the GH organisation's qualified instructors or externally by a qualified training provider. If the delivery of training and assessment programme is contracted to an external provider, the responsibility for the standards and quality of the training programmes should remain entirely with the GH organisation, as an integral part of its management system.
- (c) The GH organisation's training and assessment programme should include the following elements:
 - (1) a training needs analysis process;
 - (2) defined competence targets for training and assessment standards for the trained GH functions;
 - (3) a training and assessment plan to develop the knowledge, skills and attitude components and ensure an error-free learning;
 - (4) standards for training material and progress monitoring;
 - (5) a non-punitive staff competence evaluation and a training concept based on realistic elements;
 - (6) qualification criteria as required for the trained domain, taking into account also the aircraft operator's operational procedures;
 - (7) a description of methods and intervals for the recurrent assessment and subsequent retraining;
 - (8) instructor and assessor selection requirements, to target their competence and qualification;
 - (9) a description of procedures for evaluation, feedback and improvement of the training process to ensure the training meets its scope.
- (d) The training of the knowledge and skills components should go hand-in-hand. The attitude component should be integrated as early as possible into the training process.

AMC2 ORGH.TRG.100(b);(c) Training programme**TRAINING COURSES**

- (a) The GH training courses should cover the following, as applicable to the individual tasks:
 - (1) passenger handling, including assistance to passengers with reduced mobility (PRM).
For PRM:
 - (i) training required by Regulation (EC) No 1107/2006,
 - (ii) training on dangerous goods,
 - (iii) as applicable, training on movement of persons on the apron in accordance with Regulation (EU) 139/2014, and

- (iv) as applicable, operation of equipment (ambulift, medilift, etc.) used for PRM boarding and disembarking;
 - (2) baggage handling,
 - (3) ramp handling, aircraft arrival and departure activities,
 - (4) aircraft towing/pushback,
 - (5) aircraft de-icing/anti-icing,
 - (6) aircraft refuelling,
 - (7) aircraft cleaning,
 - (8) potable water servicing,
 - (9) lavatory servicing,
 - (10) aircraft loading/unloading, stowage, strapping, securing load,
 - (11) loading supervision,
 - (12) operation of GSE, operation of elevating equipment, hand signals for GSE guidance,
 - (13) operation of passenger boarding bridges,
 - (14) turnaround coordination for the specific turnaround coordination function and, for all GH personnel involved in GH activities on the apron during turnaround, awareness training on safety of the turnaround activities.
 - (15) operation of aircraft doors (cabin and cargo compartments),
 - (16) cargo acceptance,
 - (17) handling of ULDs,
 - (18) ULD build-up,
 - (19) activities specific to cargo and mail handling not listed above,
 - (20) ground supervision,
 - (21) Departure control system and any other training on IT tools and equipment used by the GH organisation and as required by the operational procedures of the aircraft operators,
 - (22) All-weather operations and operations in winter conditions, as applicable.
- (b) For other than ground handling training courses, such as, for example, dangerous goods, security, vehicle driving, etc., the intervals for recurrent training established by the relevant regulations apply.

AMC1 ORGH.TRG.100(b)(3) Training programme

RECOGNITION OF TRAINING

During the training needs assessment phase, GH organisations should consider mutual recognition of the GH training and skills attained by personnel in the interest of facilitating mobility across the GH industry workforce. This mutual recognition should be based on a common training syllabus and assessment methods and marking.

AMC1 ORGH.TRG.100(b)(4) Training programme**SMS TRAINING**

- (a) The SMS training should address, as a minimum, the mitigation of the safety risks in the following ground handling activities, as applicable:
 - (1) turnaround coordination,
 - (2) aircraft chocking,
 - (3) positioning and removal of GSE,
 - (4) passenger boarding and disembarking,
 - (5) operation of aircraft doors (cabin and cargo), as applicable,
 - (4) aircraft refuelling,
 - (4) aircraft loading & unloading,
 - (5) aircraft pushback/towing,
 - (6) aircraft de-icing, anti-icing.
- (b) The SMS training should include elements of safety culture, just culture, and safety reporting.
- (c) The SMS training should include practical exercises, mainly to practice hazard identification and risk assessment, to enhance the understanding of the purpose of safety management and safety culture of front-line personnel.

AMC2 ORGH.TRG.100(b)(4) Training programme**TRAINING ON THE OPERATION OF EQUIPMENT, FACILITIES OR INSTALLATIONS PROVIDED BY THE AERODROME OPERATOR**

- (a) All personnel using equipment, facilities or installations provided by the aerodrome operator for the provision of ground handling services should receive safety training relevant to their tasks for the operation of such equipment, facilities or installations.
- (b) Such equipment, facilities or installations include but are not limited to the following:
 - (1) de-icing/ant-icing facilities,
 - (2) centralised baggage handling system,
 - (3) passenger boarding bridges,
 - (4) equipment for the boarding and disembarkation of passengers with reduced mobility.
- (c) The training for the operation of the respective equipment, facilities or installations should be performed in accordance with the instructions provided by the aerodrome operator.

AMC3 ORGH.TRG.100(b)(4) Training programme**OTHER TRAINING COURSES**

- (a) The training programme should include training on the following areas, as applicable to the individual's specific GH function:
 - (1) Accident/incident investigation,

- (2) Any additional training as required by the aircraft type and the type of technology and energy used for aircraft propulsion.
 - (3) Ramp resource management training, which is team-related training with the purpose of making effective use of all available resources – people, equipment and information – to optimise personal and flight safety, and the efficiency of the aircraft turnaround.
- (b) Other training courses that should be included in the training programme, as applicable subject to the GH specific function, may be developed by the specific domains and regulations that require them. These are the following:
- (1) Foreign object debris (FOD), in accordance with Regulation (EU) 139/2014,
 - (2) Airside driving, in accordance with Regulation (EU) 139/2014,
 - (3) Control of pedestrians, in accordance with Regulation (EU) 139/2014,
 - (4) Operations in low visibility conditions and winter operations, in accordance with Regulation (EU) 139/2014,
 - (5) Aviation security,
 - (6) Emergency response procedures, appropriate to the assigned role, and in accordance with the aircraft operator and aerodrome operator manuals and procedures.

GM1 ORGH.TRG.100(b)(4) Training programme

HUMAN FACTOR AND HUMAN PERFORMANCE

Guidance material to design training programmes to develop knowledge and skills in relation to human performance can be found in ICAO Docs 9868 and 10106 and in ICAO Doc 9683 (Human Factors Training Manual).

The human factors training is intended to enhance attitudes conducive to safe and efficient GH operation. The development of soft skills such as:

- interpersonal and communication skills,
- team player skills,
- ability to work well under pressure and manage stressful situations, and
- capacity to focus and avoid distractions,

increases in turn the likelihood of the candidate successfully completing the training programme and acquire the desired competence.

GM2 ORGH.TRG.100(b)(4)

RAMP RESOURCE MANAGEMENT TRAINING

- (a) Ramp resource management (RRM) and communication in the airside environment

Ineffective RRM and communication, including language proficiency (languages used in accordance with ORGH.TRG.115), use of standard terminology, hand signals, visual communication, distraction from outer sources (e.g., mobile phones) are all factors that may lead to unsafe situations in the airside operational environment. In a well-functioning operational environment, individuals should have the necessary skills to communicate effectively.

- (b) The GH organisation should develop and implement a RRM training as a mitigation measure to ensure safety of GH services on the apron, in addition to the implementation of the standard operational procedures and compliance with the GSE requirements. The GH organisation may use the [RRM training syllabus supporting document NLR-TR-2012-483-tr](#) to develop and implement the RRM training.
- (c) The ultimate goal of RRM is to prevent fatal aircraft accidents through reduction of errors during the aircraft turnaround process and management of the effects of errors that still occur. The purpose of RRM training is to:
- (1) decrease the number of incidents of aircraft/equipment damage and personal injuries;
 - (2) increase awareness and recognition of human factors and their effect on the aircraft turnaround;
 - (3) improve safety barriers against human error;
 - (4) decrease operational disruptions;
 - (5) increase efficiency;
 - (6) increase individuals' awareness of being part of a larger and more efficient team.
- (d) The RRM training should cover the following main key risk areas which are all to be found in interfaces and communication between the actors involved in aircraft handling activities:
- (1) between the members of involved stakeholders (e.g., a loading team),
 - (2) between different stakeholders (e.g., aircrew and GH),
 - (3) involved human beings and technology (e.g., interpretation of the docking system display),
 - (4) involved human beings and procedures (e.g., approaching an aircraft during the arrival process),
 - (5) involved human beings and the environment (e.g., weather conditions, low visibility, slippery apron).
- (e) The RRM training should reflect the operational context at the aerodrome(s) where the GH organisation provides services. It is recommended that it is included or closely linked to the human-factor training.
- (f) The learning objectives of the RRM training should cover knowledge, skills and attitude components as listed in the following table (source indicated in point (a)):

Topic	Element	Knowledge	Behaviour
Turnaround process	Turnaround process	1. Understanding the 'bigger' picture	1. Feels part of a larger process
	Type and role of actors	1. Understanding the roles and interests of other actors 2. Understanding similarities and differences in interests	1. Focuses on common goals 2. Considers interests of other actors
	Dependencies /Interfaces	1. Understanding the dependencies/ interfaces between the	1. Considers the importance of a safe aircraft handling

		various actors/processes	2. Considers the limitations of other actors
	Situational awareness (risk awareness)	1. Awareness of high-risk situations/areas 2. Awareness of risk consequences	1. Remains alert on hazards 2. Alerts colleagues/other actors to hazards
	Pressures on the process	1. Awareness of pressures and their effect on the turnaround process	1. Adequately manages pressures to avoid additional hazards
Applicable regulations (safety, security)	Reg. (EU) on GH Reg. (EU) 139/2014 Reg. (EU) 965/2012	Awareness of applicable regulations concerning safe provision of GH services	1. Adherence to procedures 2. Motivating others to adhere to procedures
	Security	Awareness of aircraft security regulations	
Teamwork	Team dynamics	1. Knowledge of team objectives 2. Awareness of individual and team responsibility	1. Understands the team objectives 2. Feels responsible for team performance 3. Understands his/her role in the team 4. Takes condition of other team members into account 5. Actively participates in the team 6. Encourages input and feedback from others 7. Offers assistance in demanding situations
	Leadership	1. Awareness of being a role model 2. Understanding of various leadership styles and how they affect the team 3. Understanding of elements that build the team safety culture	1. Leads by example 2. Motivates team members to work safely 3. Shares the workload 4. Applies assertive communication
	Communication	1. Awareness of the importance of good communication	1. Uses standardised communication

		<ol style="list-style-type: none"> 2. Awareness of the advantages of standardised communication 3. Awareness of potential communication breakdowns 	<ol style="list-style-type: none"> 2. Verifies if the message is understood 3. Asks for clarification if the message is unclear
	Cultural, ethnic and educational differences	<ol style="list-style-type: none"> 1. Understanding of cultural, ethnic and educational differences 2. Understanding of how differences may increase risk 3. Understand why conflicts arise and strategies to solve them 	<ol style="list-style-type: none"> 1. Treats others with respect 2. Asks for clarification when unsure 3. Speaks up when necessary 4. Clarifies mis-understandings 5. Keeps calm in conflicts 6. Suggests conflict solutions 7. Concentrates on <i>what</i> is right instead of <i>who</i> is right
	Team situational awareness	<ol style="list-style-type: none"> 1. Awareness of the importance of knowing what is going on around you 2. Awareness of the condition of equipment 3. Anticipation on potential threats and errors 	<ol style="list-style-type: none"> 1. Stays aware of activities going on around him/her 2. Checks equipment status 3. Reacts appropriately to potential threats and errors
Threat and error management	Threat identification	<ol style="list-style-type: none"> 1. Knowledge on how to identify threats 	<ol style="list-style-type: none"> 1. Correctly identifies threats
	Threat management	<ol style="list-style-type: none"> 1. Knowledge on how to manage threats 	<ol style="list-style-type: none"> 1. Appropriately manages threats
	Error	<ol style="list-style-type: none"> 1. Knowledge on error types and consequences (what can go wrong?) 	<ol style="list-style-type: none"> 1. Identifies errors 2. Reports errors without losing face
	Error management	<ol style="list-style-type: none"> 1. Knowledge on how errors can be managed to reduce risks (how do you handle it?) 	<ol style="list-style-type: none"> 1. Appropriately manages errors 2. Learns from errors
Human performance and limitations	Time pressure	<ol style="list-style-type: none"> 1. Knowledge on how time pressure affects human performance 	<ol style="list-style-type: none"> 1. Notices when time pressure starts to affect human performance

			2. Adequately manages time pressure
	Stress	1. Knowledge on how stress affects human performance	1. Notices stress factors 2. Adequately manages stress
	Fatigue	1. Knowledge on how fatigue affects human performance	1. Notices when fatigue starts to affect human performance 2. Adequately manages signs of fatigue
	Psychoactive substances, medicines	1. Knowledge on how alcohol, medicines and drugs affect human performance	1. Refrains from alcohol use prior to work 2. Reports medicine use 3. Refrains from drug use

GM3 ORGH.TRG.100(b)(4) Training programme

SAFETY TRAINING FOR THE HANDLING OF PASSENGERS WITH REDUCED MOBILITY

- (a) Personnel involved in the handling of passengers with reduced mobility (PRM) should receive safety training commensurate with their tasks. The safety training should include:
- (1) dangerous goods training specific to the passenger acceptance functions in accordance with the ICAO Technical Instructions,
 - (2) ground transportation of PRM between the airport terminal and the aircraft.
- (b) The safety training should be aligned with the training required by other applicable regulations for the personnel involved in the handling of PRM.
- (c) The personnel involved in the operation of GSE for boarding and disembarking of PRM and loading/unloading of their mobility aids should additionally receive training in dangerous goods in accordance with AMC1 GH.OPS.100 and operation of GSE in accordance with GH.OPS.305.

GM1 ORGH.TRG.100(b)(5) Training programme

ON-THE-JOB TRAINING

- (a) On-the-job training is part of the initial training.
- (b) On-the-job training is the component of the training programme performed in the operational environment, which combines the knowledge, skills and attitudes acquired during the previous training phases in a realistic environment. This is different from the training of the skills component, which is performed in a training environment.

AMC1 ORGH.TRG.100(c)(1) Training programme

RECURRENT TRAINING FOR CONTINUED COMPETENCE

- (a) The recurrent training performed every 36 months should be based on the initial training syllabus. The recurrent training should end with an assessment that acknowledges an individual's continued competence.
- (b) As alternative to the 36-month recurrent training, the GH organisation may apply, if suitable to the size and complexity of its operation, recurrent assessment and subsequent retraining as a method to maintain continued competence of its personnel and ensure that their knowledge and skills remain at the required level.
 - (1) The recurrent assessment should be performed at regular intervals, relevant for the operational context, but shorter than 36 months from the previous training and assessment.
 - (2) The recurrent assessment should be performed in an operational environment, during usual activities, by an appropriately trained supervisor, using a checklist based on the individual's daily tasks.

GM1 ORGH.TRG.100(c) Training programme

TYPES OF TRAINING FOR CONTINUED COMPETENCE

- (a) **Recurrent training**
 - (1) Recurrent training includes training and assessment of the knowledge and skills of an individual, which are necessary to perform their GH tasks to the required standard.
 - (2) When recurrent assessment is used as an alternative method to the 36-month recurrent training, the individual is informed in advance that they are subject to a recurrent assessment. The results of the recurrent assessment may lead to retraining in those areas where the individual has performed their tasks below the established levels of competence, and not necessarily undergo full recurrent training. The results of the recurrent assessment and the subsequent retraining may serve as proof of recurrent training.
- (b) **Refresher training** ensures continued competence of an individual by updating them on the latest changes or requalifying them. It addresses the gaps identified in the individual's ability to perform their tasks to the established standards. It includes training and assessment of the knowledge and skills appropriate to the individual's function.

Refresher training may be provided using the following methods, depending on the duration of absence and the individual's proven competence:

- (1) Update training – when there are new or changed procedures, processes, or amendments to the applicable regulations, which have not yet been included in the recurrent training. Its purpose is to ensure continued competence of an individual as a result of changes relevant to their tasks.
 - (i) Update training can be provided regardless of whether the individual has worked continually in their assigned role or has been absent for a period of time. Such training is developed and delivered following an analysis and change management process.

- (ii) The update training can be delivered in various forms including classroom, online training, videos, or formally documented briefings to employees.
 - (iii) Examples of situations when update training should be provided: changes to operational procedures, new aircraft type in the fleet, new operating systems, new ground support equipment, or a combination of these.
- (2) Update training and on-the-job assessment in the following cases:
- (i) when the individual has previously achieved competence to perform a certain function but can no longer demonstrate the required competence or
 - (ii) when the individual has been absent from the operational role between 3 and 12 consecutive months;
- (c) **Requalification training** is provided after a period of absence between 12 and 24 consecutive months or when an individual does not perform their tasks to the established standards regardless of any interval of absence. Requalification training does not need to be identical to the initial training; only the gap elements in the individual's performance should be covered. Additionally, an update training should be included. Requalification training ends with an assessment of competence to ensure the individual has achieved the same level of competence as required after an initial training.

GM1 ORGH.TRG.100(b);(c) Training programme

ASSESSMENT AND ERROR-FREE LEARNING

'Error-free learning' should not be understood that every exam is passed at a 100% rate.

It means that incorrect answers are discussed to correct any misunderstanding in the trainee, while the original exam mark remains unaltered. Failing to pass the exam results in a re-sit being required.

GM2 ORGH.TRG.100(b);(c) Training programme

DEVELOPMENT OF AN EFFECTIVE TRAINING AND ASSESSMENT PROGRAMME

- (a) Multiple tasks should be integrated in one exercise or one assessment scenario.
- (b) The training and assessment of skills and attitudes during group training or assessment could be based on tasks allowing interaction during communication, workload management, problem solving and decision making, teamwork.
- (c) To avoid a subjective assessment, the assessment phase should also include assessment in pairs or groups, to allow trainees to assess themselves by comparing themselves to the others.
- (d) Competence assessment: The GH organisation should define in its ground handling manual what skills and knowledge are required to perform a specific task. That information should include feedback from employees.

GM1 ORGH.TRG.100(c)(1) Training programme

RECURRENT ASSESSMENT

- (a) To ensure continued competence of GH personnel in performing the tasks as per the required standards, the GH organisation should develop and implement a method to perform non-punitive recurrent assessments and subsequent retraining of the GH personnel.

- (b) The recurrent assessment should be performed during real-time activities (on-the-job performance) and should be based on realistic and evident tasks specific to the role.
- (c) The recurrent assessment programme should:
 - (1) identify the responsibilities of the assessors and the assessment methods, tools, and procedures;
 - (2) include procedures to be applied if the personnel do not perform their tasks at the required standards.
- (d) The individual(s) under assessment should be informed in advance of the date and the expected assessment conditions.
- (e) The recurrent assessment should check knowledge, skills and attitudes simultaneously. A recurrent assessment session does not need to cover the verification of all the tasks and responsibilities of an individual in one go; however, they should be assessed in entirety within 36 months.
- (f) The assessment should provide the anonymous and confidential results and a recommendation of corrective measures.
- (g) The minimum pass rate for an examination should be 80%.
- (h) The results and recommendations from the evaluation should support the gap analysis to identify competency gaps of a group and adjust tasks and the respective training for the role-related target group, rather than individual competence gaps.
- (i) The resulting re-training based on the gap analysis should be later on applied to the intended target group.
- (j) The GH organisation should establish a procedure to ensure that the instructor/assessor reviews the incorrect answers together with the trainee in order that their knowledge is 100% 'error free' and correct on leaving the learning environment.
- (k) The frequency of the recurrent assessment should be driven by evident scenarios, safety events, accident/incident reports, or changes within the regulation or aircraft operators' manuals, and results from regular non-punitive competence evaluations. The evaluation and re-training interval should not exceed 36 months.
- (l) If the recurrent assessment indicates areas where the level of competence is below the required standard, the GH organisation should adjust the retraining session to the needs identified after the recurrent assessment, to address the gaps in performance.
- (m) The recurrent assessment and retraining should be documented for recording and inspection purposes.

GM2 ORGH.TRG.100(c)(1) Training programme

MEANS TO IMPLEMENT RECURRENT ASSESSMENT

[placeholder]

Checklists to be used by assessors for recurrent assessment of individuals during daily operation

GM2 ORGH.TRG.100(a) Training programme

COMPETENCY-BASED TRAINING AND ASSESSMENT (CBTA) PROGRAMME AS ALTERNATIVE TRAINING METHOD TO ENSURE COMPETENCE OF SAFETY-CRITICAL GH FUNCTIONS

The GH organisation should establish between 2 and 4 main competencies selected from the general competency framework provided in ICAO Doc 9868 and develop and implement the CBTA programme for each GH safety-critical specific function based on those competencies. The selection should be based on the need to address the safety risks associated with that GH function. These competencies should be the minimum necessary for the basic level of a specific safety-related GH function.

Step 1: Perform a training needs analysis: what is the level of training and qualification of the trainee before training, what it should be for the respective function after training.

Step 2: Set the training objective, based on the safety objective to be achieved by that GH function.

Step 3: Set the training targets, based on the tasks specific to the GH function established in Step 1 (see examples of GH safety critical functions below). These should be realistic targets, something that the individual is usually expected to perform as per the standard established in the ground handling manual.

Step 4: Select 2-3 main competencies from the table below, based on the main competency framework of ICAO Doc 9868 PANS-TRG. The competencies should address the operational risks that should be mitigated through training.

Step 5: Assign which of the selected competencies are intended to be developed in relation to each task that an individual must perform in their assigned function. The easiest way to determine which tasks these should be is to take them from the job description of that function. With this, one determines the conditions under which the competencies have to be demonstrated. These represent the operational and environmental context in which the operations take place and the tools used for the operational control (equipment, systems, etc.).

Step 6: Develop the training and assessment programme based on the development of knowledge, skills and attitudes. Create exercises based on real tasks from daily operations and to reflect the operational context in which the GH organisation operates. As elements to be integrated in the exercise for the creation of a realistic, evidence-based context, use the ground handling manual and specific procedures, safety data from the reported events, the GH organisation's tools, operational systems, equipment or GSE, as the case may be. Integrate elements from the applicable regulations.

Step 7: For each exercise or assessment, select observable behavioural markers and performance criteria.

Step 8: Develop the assessment process, the process of subsequent re-training, identify the adequate assessment tools, the gaps in the development of the established competencies.

When conducting an operational assessment to validate or revalidate a person's competence, the individual is assessed against the current operational procedures of the organisation. The assessment will be without error, and sufficient questions will be asked to check the underpinning knowledge of the employee.

The assessment will include not only the required knowledge, but also the skills and attitudes.

The written evidence of an assessment event will specify which elements were assessed, when they were assessed and the result of the assessment. Where the operational assessment shows a performance failure or lack of knowledge, the instructor/assessor will apply re-training to correct both

the performance and any knowledge gaps. The level of action will be proportionate to the requirement.

Step 9: Assess the training process, identify the gaps through the assessment phase, to address the risks and targets better. Improve the training programme.

Step 10: Design the training plan based on the given training standards.

Step 11: Establish the trainer's/assessor's competencies and qualification.

The selected competencies intended to be developed through training competencies are expected to be developed at 3 levels – knowledge, skills, and attitudes.

The individual's attitude should be trained and monitored along with the knowledge and skills components. The attitude is closely linked to the trainee's motivation. It can be assessed from the quality of their preparation during the training or by designing exercises that require them to use attitude-related competencies, such as communication, situational awareness, problem-solving and decision-making.

Table containing the main competency framework published in ICAO Doc 9868 PANS-TRG:

Competencies	Functions (several functions can be allocated to one role)
Application of procedures and regulations	Identifies and applies procedures in accordance with published operating instructions and applicable regulations using the appropriate knowledge
Technical expertise	Applies and improves individual technical knowledge and skills.
Process improvement	Contributes to the continuous improvement of the system
Communication	Communicates effectively in all situations
Situational awareness	Perceives and comprehends all relevant info available and anticipates what could happen that may affect the operation
Workload management	Manages available resources efficiently to prioritize and perform tasks in a timely manner under all circumstances.
Problem-solving and decision making	Accurately identifies risks and resolves problems. Uses appropriate decision-making techniques.
Leadership and teamwork	Collaborates up, down and across the organization to foster and promote a clear vision and common goals. Energizes others to achieve the operational goals.
Coordination and handover	Manages coordination and handover between personnel
Teamwork	Operates safely and efficiently as a team member
Self-management and continuous learning	Demonstrates personal attributes that improve performance and maintain an active involvement in self-learning and self-development

GM2 ORGH.TRG.100(a) Training programme

GH SAFETY-CRITICAL FUNCTIONS IN THE SCOPE OF A CBTA PROGRAMME AS ALTERNATIVE TRAINING PROGRAMME

The competency-based training and assessment (CBTA) programme could be used as an alternative method to deliver training to the safety-critical GH functions to ensure the competence of personnel assigned on those tasks.

- (a) The following GH functions are considered to be safety-critical:
- (1) Loading supervision
 - (2) Aircraft loading/ unloading
 - (3) Operation of GSE including passenger stairs, passenger boarding bridge, airbridge, cargo loader
 - (4) Aircraft towing and pushback
 - (5) Aircraft arrival and departure activities
 - (6) Turnaround coordination
 - (7) Fuelling operations
 - (8) De-icing/anti-icing operations
 - (9) A function that requires handling of dangerous goods on the apron, in the cargo warehouse, during aircraft loading, or for load planning.

DEVELOPMENT OF COMPETENCIES FOR TASKS RELATED TO AIRCRAFT ARRIVAL AND DEPARTURE

- (b) The knowledge component should include:
- (1) airside safety
 - (2) ERA
 - (3) aircraft arrival/departure activities
- (c) Competencies:
- (1) situational awareness,
 - (2) teamwork,
 - (3) application of procedures

DEVELOPMENT OF COMPETENCIES FOR THE TURNAROUND COORDINATION FUNCTION

- (d) The technical knowledge content for the turnaround coordinator function including responsibilities and monitoring should include the following elements, as applicable to the ground handling activities under supervision:
- (1) turnaround management
 - (2) principles of flight
 - (3) general loading principles, including ULD
 - (5) loading instructions, including last minute changes
 - (6) aviation weather

- (7) passenger boarding bridge
 - (8) aircraft passenger doors
 - (9) aircraft refuelling awareness
 - (10) aircraft de-icing /anti-icing awareness
 - (11) potable water and toilet servicing
 - (12) catering loading
 - (11) aircraft operator's turnaround plan and specific procedures
- (e) Competencies:
- (1) situational awareness,
 - (2) communication,
 - (3) workload management,
 - (4) coordination and handover

DEVELOPMENT OF COMPETENCIES FOR A PUSHBACK/ TOWING DRIVER – EXAMPLE

- (f) For the pushback/towing driver, the training programme should develop the individual's main competencies necessary for this function. The training should be based on the main tasks specific to the job of a pushback/towing driver.
- (g) Competencies:
- (1) situational awareness,
 - (2) communication,
 - (3) operational procedures,
 - (4) technical expertise could be a fourth main targeted competency.

THE 'SITUATIONAL AWARENESS' COMPETENCY

- (h) Training to develop this competency should address and mitigate the incorrect or inadequate perception of individuals in an aerodrome and ground handling operational environment. It should also address the risks of complacency when performing routine/repetitive tasks.

Recognition of and knowledge about what constitutes a threat or a hazard in the operational environment is an essential part of deciding on the most appropriate action. This should be part of the initial and ongoing training for GH personnel but the impact of reduced training opportunities, manning or other resource issues can often mean that staff are not fully cognizant of the potential dangers of their working environment. At the other end of the continuum, longer serving staff may find that the risk of working around aircraft has become normalised creating a perception of familiarity and invulnerability.

There are many theories that explain how people perceive risks, how they process risk information and make decisions or take actions based on this information, both consciously and unconsciously. The key findings from the literature that are relevant to ground handling activities are that:

- (1) people are not good at estimating or evaluating risk;
- (2) people who underestimate risk are more likely to take risks;

- (3) there is often an overestimation of own capability or invulnerability and an underestimation of severity of outcome;
 - (4) the perception of risk becomes normalised over time.
- (i) Training objectives: In order to take appropriate action in any given situation, the individuals should:
- (1) have a good understanding of the risks associated with working around aircraft.
 - (2) be able to form an accurate risk perception. This implies correctly assessing the likelihood and severity of a risk impact. Such assessment is subjective and is based on what people know and think (cognition), how they feel (emotion), their experience, age, and characteristic traits and patterns of behaviour, as well as the environmental and socio-cultural context.
 - (3) understand the impact of the working environment on the cognitive processing of risk information.
 - (4) understand the difference in individual risk appetite and perception and the normalisation of risk over time.

AMC1 ORGH.TRG.100(d) Training programme

TRAINER AND ASSESSOR TRAINING

The GH organisation should ensure that its training programme includes minimum criteria of competence and qualification of trainers and assessors.

AMC2 ORGH.TRG.100(d) Training programme

GH TRAINERS – MINIMUM QUALIFICATION AND COMPETENCE

[Placeholder]

GM1 ORGH.TRG.100(d) Training programme

ASSESSORS

- (a) The GH organisation may appoint, as assessors for the recurrent assessment sessions and on-the-job training and assessment individuals that have similar tasks and responsibilities in its organisation. Mentors could be trained to become assessors in this sense.
- (b) These assessors should receive further training in the human performance and limitations, as well as minimum elements of instructor and assessor training, to be able to perform the instructions and assessment of their peers during recurrent assessment.

GM2 ORGH.TRG.100(d) Training programme

MENTORS

A trainer is a competent person who officially delivers training to employees. On-the-job trainer means a competent person who enables the delivery and aids in the development of theoretical knowledge and practical competence within the operational environment.

Whenever the size and operational structure of an organisation permits it, the GH organisation may use senior employees competent in the same tasks as the trainee to act as mentors.

The role of such mentors is to assist and guide the trainee on technical matters and on a social (integration) level, especially in the case of new employees. A mentor could also contribute to the development of the desired attitudes of a new employee.

Below is a list of tasks and responsibilities of a mentor, as well as competencies that are desirable to be met by such a guiding person. The list is for orientation purposes, as it is not expected that one person meets all these criteria:

- (a) Core tasks:
- (1) Provide technical expertise:
 - (i) help with developing and maintaining competencies,
 - (ii) teaching knowledge and skills,
 - (iii) supporting the learning process,
 - (iv) promoting the safety culture,
 - (v) providing feedback,
 - (vi) point of contact.
 - (2) Promote social integration:
 - (i) share information on the purpose of the organization,
 - (ii) communicate existing agreements and point out their importance (safety regulations, breaks, etc.),
 - (iii) promote equality by building a safe and honest relationship,
 - (iv) guiding the trainee in the organisation's network.
- (b) Responsibilities:
- (1) Guide and motivate (new) employees optimally, in line with the agreed commitment,
 - (2) Maintain his or her own skills and expertise,
 - (3) Apply means developed by the GH organisation for the execution of the mentor function (by developing or using a checklist, information folder, etc.) in coordination with the safety manager and the supervisor.
- (c) Competencies:
- (1) Knowledge
 - (i) knowledge and expertise in one's own role,
 - (ii) knowledge about the structure of the organisation.
 - (2) Skills:
 - (i) social skills,
 - (ii) be able to lead by example,
 - (iii) be able to listen actively,
 - (iv) be able to motivate,
 - (v) be accessible,

- (vi) communicate efficiently,
 - (vii) recognise non-verbal signals,
 - (viii) be able to influence the learner,
 - (ix) be able to provide feedback,
 - (x) be able to evaluate,
 - (xi) show respect,
 - (xii) stimulate autonomy.
- (3) Attitude:
- (i) willing to invest time
 - (ii) mature and experienced
 - (iii) patient
 - (iv) prepared to give trust
 - (v) prepared to being co-responsible for someone's development
 - (vi) self-confident
 - (vii) trustworthy
 - (viii) impartial
 - (ix) tolerant
 - (x) motivated.
- (d) Types of mentors – examples:
- (1) mentors ('buddy') who assist and guide employees that a seniority of less than 3 months;
 - (2) mentors ('coach') who assist and guide any employee, depending on the organisation's needs (e.g., team coach, performance coach, on-the-job coach). An employee may become a coach after having undergone a specific advanced training course and evaluation.

AMC1 ORGH.TRG.100(e) Training programme

EVALUATION OF THE TRAINING PROGRAMME

The GH organisation should develop a process for ongoing evaluation of the training programme of its GH personnel. The evaluation should ensure that:

- (a) The training and assessment plans are relevant to the work in the specific context and environment to which they may be assigned after training;
- (b) The programme enables the trainees to achieve the interim and final competency standards; and
- (c) Remedial actions are taken if in-training and post-training evaluation indicates evident criteria to do so.
- (d) The evaluation of the training programme should take place regularly, with a frequency that is relevant to the organisation.

AMC1 ORGH.TRG.110(a) Dangerous goods training

DANGEROUS GOODS TRAINING OF PERSONNEL RESPONSIBLE FOR THE PREPARATION OF MOBILITY DEVICES OF PASSENGERS WITH REDUCED MOBILITY FOR AIR TRANSPORT

The GH organisation should ensure that the personnel involved in the provision of services to passengers with reduced mobility receive training on dangerous goods commensurate with their tasks, to mitigate safety risks of transporting mobility devices containing batteries of any type. This includes tasks related to the packaging and loading of mobility devices and their batteries onto the aircraft.

AMC1 ORGH.TRG.115 Common language

LANGUAGE OF COMMUNICATION IN DAILY OPERATIONS

The language used by the GH personnel to communicate with the aircrew or the aerodrome operator personnel in their daily operational tasks may be English or any other language spoken both by the aircrew or, respectively the aerodrome operator personnel and the GH personnel.

GM1 ORGH.TRG.115 Common language

OPERATIONAL USE OF COMMON LANGUAGE

- (a) GH personnel whose daily operational tasks include regular communication with the aircrew or the air traffic control should be able to communicate effectively in the English language. Any derogation decided by the competent authority in accordance with Regulation (EU) 139/2014 remains valid and prevails over this GM.
- (b) The following GH functions are subject to the guidance in point (a), however the list is for orientation purposes, and the GH organisation may decide to consider other GH functions as well:
 - (1) aircraft towing and pushback,
 - (2) fuelling operations,
 - (3) aircraft de-icing/anti-icing operations,
 - (4) turnaround coordination,
 - (5) loading supervision.
- (c) The GH organisation should ensure that its personnel are able to communicate efficiently in a job-related context particularly to handle abnormal and emergency situations and conduct non-routine coordination with colleagues and other GH operational staff, regardless of whether the language used is English or another language. Emphasis should be placed on listening comprehension, speaking interaction and vocabulary building.
- (d) A person's ability to communicate effectively in an operational context could be demonstrated as follows:
 - (1) communicate on common and work-related topics with accuracy and clarity;
 - (2) use appropriate communicative methods to exchange messages and to recognise and resolve misunderstandings in a general or work-related context;
 - (3) linguistically handle a complication that occurs during a routine work situation or a communicative task with which they are otherwise familiar.

SUBPART GSE — GROUND SUPPORT EQUIPMENT

AMC1 ORGH.GSE.100 Ground support equipment – general

General

- (a) The GH organisation should consider the following aspects when acquiring any ground support equipment (GSE):
 - (1) human factor principles, including equipment controls, ambient temperature control inside the equipment, where applicable,
 - (2) enhanced systems to prevent aircraft damage,
 - (3) aerodrome operator conditions regarding GSE. The aerodrome operator may also request the GH organisation to provide updated information on the number, status, characteristics and availability of all the GSEs used for the provision of ground handling services.
- (b) When using autonomous vehicles, the GH organisation should ensure that these have been authorised according to local procedures to be used at that aerodrome and any local procedures and instructions are observed.
- (c) Each piece of GSE should bear a unique asset identification number.

GM1 ORGH.GSE.100(c) Ground support equipment – general

PROVISION OF GSE VS OPERATION OF GSE

- (a) When the aerodrome operator *provides* equipment, facilities or installations for the provision of ground handling services, this does not automatically make the aerodrome operator a ground handling organisation in the sense of this Regulation.
- (b) When the aerodrome operator also *operates* such equipment, facilities or installations using its own personnel, then it is considered a ground handling organisation and this Regulation applies to it unless the aerodrome operator is eligible for an exemption in accordance with Article 2(3) of this Regulation.
- (c) The operation of the equipment, facilities or installations usually remains in the responsibility of the GH organisation that uses them for the provision of GH services unless the aerodrome operator operates them with its own personnel.
- (d) The training on the safe operation of the equipment, facilities or installations may be provided either by the aerodrome operator providing the equipment, facilities or installations or by the GH organisation, based on the instructions of the aerodrome operator.

AMC1 ORGH.GSE.105 Ground support equipment maintenance programme

MAINTENANCE PROGRAMME

- (a) The GH organisation should use the maintenance programme and instructions provided for by the equipment manufacturer.
- (b) The maintenance programme of the GSE should be reflected in the safety risk assessment process of the GH organisation.
- (c) The maintenance programme should include regular and ad-hoc inspections of GSE serviceability and should include both motorised and non-motorised GSE.
- (d) The GH organisation may develop and use checklists in support of the maintenance programme and serviceability inspections.

GM1 ORGH.GSE.105 Ground support equipment maintenance programme

FURTHER GUIDANCE

- (a) The GSE should meet existing international manufacturing standards applicable to GSE and vehicles used for aircraft and passenger handling.
- (b) ICAO Doc 10121 Ground Handling Manual contains further guidance in Chapter 4.5 on human factors.
- (c) For the implementation of the maintenance programme the GH organisation can use the EN 12312 Standards for ground support equipment.

ANNEX IV

OPERATIONAL REQUIREMENTS FOR GROUND HANDLING SERVICES (PART-GH.OPS)

AMC1 GH.OPS.010 Interfaces with other organisations

PROCEDURES

- (a) The GH organisation should ensure its operational procedures identify and address the interfaces with the other organisations. The relevant content of ICAO Doc 10121 Ground Handling Manual and other industry good practices may be used.
- (b) The GH organisation should contribute with its own SMS and safety data to the actions initiated by the aerodrome operator to achieve a risk mitigation plan for integrated risks coming from all the users of that aerodrome.
- (c) The GH organisation should apply the following steps in the identification of interfaces and to develop the necessary actions:
 - (1) Identify in which of the processes or procedure there are interfaces,
 - (2) Whether they are internal or external interfaces,
 - (3) Consider the critical nature of each interface, and whether there are any hazards related to the interfaces,
 - (4) Whether data sharing is required,
 - (5) Carry out joint hazard analysis and safety risk assessment with the aerodrome operator or the aircraft operator or both, as the case may be.

GM1 GH.OPS.010 Interfaces with other organisations

COMMUNICATION, COOPERATION AND COORDINATION BETWEEN AIRCRAFT OPERATORS, AERODROME OPERATORS AND GH ORGANISATIONS

- (a) Communication, cooperation and coordination among GH organisations, aircraft operators and aerodrome operators are key elements in ensuring the regularity, efficiency and safety of operations. The GH organisation should share experiences and participate in:
 - (1) ground operations groups;
 - (2) airport safety committees;
 - (3) national safety forums; and
 - (4) GH organisation networks.
- (b) To ensure safe and efficient aircraft operations, it is essential that the GH organisation actively participate in airport collaborative decision-making (A-CDM), total airport management and any other project where the possibility to exchange relevant safety information is provided, as relevant to local and aerodrome operators' requirements. To facilitate best use of the air traffic management system, GH organisations play an important role by providing accurate estimation of turnaround times and off-block times at departure aerodromes to calculate estimated take-off time.

(c) Safety risk management

Hazard identification and risk assessment start with an identification of all stakeholders involved in the GH activities, including independent experts and non-approved organisations. It extends to the overall control structure, assessing, in particular, the following elements across all subcontract levels and all parties within such arrangements:

- (1) coordination and interfaces between the different parties;
- (2) applicable procedures;
- (3) communication between all parties involved, including reporting and feedback channels;
- (4) task allocation responsibilities and authorities; and
- (5) qualifications and competency of key personnel.

Safety risk management should focus on the following aspects:

- (6) clear assignment of accountability and allocation of responsibilities;
- (7) only one party is responsible for a specific aspect of the arrangement — no overlapping or conflicting responsibilities, in order to eliminate coordination errors;
- (8) existence of clear reporting lines, both for occurrence reporting and progress reporting;
- (9) possibility for GH personnel to directly notify the aircraft operator or aerodrome operator of any hazard suggesting an obviously unacceptable safety risk as a result of the potential consequences of this hazard.

(d) Guidance on establishing operational interfaces may be found in ICAO Doc 10121 Manual on Ground Handling.

(e) Guidance on A-CDM may be found in the following documents:

- (1) Manual on Collaborative Air Traffic Flow Management (ATFM) (Doc 9971), Part III, Airport collaborative decision-making;
- (2) Eurocontrol Airport Collaborative Decision-Making (A-CDM) Implementation Manual.

GM2 GH.OPS.010 Interfaces with other organisations

RESPONSIBILITIES OF INDIVIDUAL STAKEHOLDERS INVOLVED IN THE SAME GH ACTIVITY

In case of conflicting procedures related to the same activity developed by at least 2 out of 3 of the organisations involved (i.e., GH organisation, aerodrome operator, or aircraft operator), the affected stakeholders should discuss those procedures and perform a safety assessment that should ultimately lead to a commonly agreed version that ensures the safest and most efficient way to apply those procedures.

The procedures should be as harmonised as possible for each aircraft type/family to achieve greater efficiency and reduce complexity thus enhancing safety.

Such examples are the aircraft refuelling operations, or procedures for aircraft handling in adverse weather conditions, which involve the aircraft operator, the aerodrome operator, and the GH organisation providing refuelling services.

GM3 GH.OPS.010 Interfaces with other organisations

INTERFACES BETWEEN GH ORGANISATIONS, AIRCRAFT OPERATORS AND AERODROME OPERATORS

The following GH activities have been identified to require operational interfaces between the GH organisation, the aircraft operator and the aerodrome operator.

Activity	GH organisation	Aerodrome operator	Aircraft operator
Walking and working airside	<ol style="list-style-type: none"> 1. Ensure training is in place and compliance by its personnel with aerodrome and aircraft operator general safety policies and procedures. 2. Assess local risks and job tasks to identify any additional PPE such as high visibility clothing, safety shoes or boots, clothing appropriate to the weather, gloves, face protection or safety goggles. 3. Observe national regulations on health and safety. 	<ol style="list-style-type: none"> 1. Set the overall design and operation of the airside areas. 2. Set and ensure the application of general safety policies and procedures such as access to airside, apron discipline, use of PPE, etc. 	<ol style="list-style-type: none"> 1. Set and ensure the application of general safety rules on aircraft turnaround, such as driving in the vicinity of, walking around, and approaching the aircraft. 2. Aircraft operator to have a procedure for aircraft turnaround safety.
Vehicle and equipment operation	<ol style="list-style-type: none"> 1. Ensure that personnel are trained and competent to operate the vehicles and equipment they are expected to drive and operate, in accordance with the manufacturers and air and aerodrome operators' requirements. 2. Ensure that vehicle/equipment maintenance schedules are followed and serviceability checks are conducted. 3. Ensure that its vehicles and personnel comply with the aerodrome driving rules. 4. Ensure the vehicles are in accordance with aircraft manufacturer specifications, where these are provided. 5. Use a guide person when positioning equipment. 	<ol style="list-style-type: none"> 1. Develop rules for the operation of vehicles on the apron, including a formal driver training, assessment and licensing scheme for all drivers operating on the movement area. 2. Develop an agreed set of minimum standards for the condition and maintenance of airside vehicles. 3. May perform regular vehicle checks. 4. Issue an airside vehicle permit for any vehicle operating airside. 	-
Foreign Object Debris (FOD)	<ol style="list-style-type: none"> 1. Participate in the aerodrome operator's and aircraft operators' FOD management programmes and should 	<ol style="list-style-type: none"> 1. Develop a comprehensive FOD management programme 	<ol style="list-style-type: none"> 1. Awareness training for personnel on the hazards of FOD

Activity	GH organisation	Aerodrome operator	Aircraft operator
	<p>encourage all personnel to adhere to it.</p> <p>2. Supervisors should constantly be aware of the potential for FOD and be knowledgeable of their area of responsibility and ensure personnel are aware of and are participating in the FOD prevention programme effort.</p> <p>3. Personnel should be made aware of the hazards of FOD to aircraft and individuals. To measure programme effectiveness, incidents caused by FOD should be reported.</p>	<p>including detection, prevention and evaluation of FOD on the airport.</p>	<p>to aircraft and individuals.</p>
<p>Equipment approaching the aircraft</p>	<p>1. Ensure personnel are trained according to the operational procedures and instructions provided by the aircraft operators.</p> <p>2. Ensure that GSE servicing the aircraft is serviceable.</p> <p>3. Ensure the GSE avoids any contact with the aircraft fuselage.</p> <p>4. Ensure that, when positioning GSE, adequate clearance is maintained between all GSE and the aircraft to allow vertical movement of the fuselage during the entire ground handling process.</p> <p>5. Ensure that each GSE is positioned/ parked so as not to hamper other GH activity, especially escape routes of fuel trucks.</p> <p>6. GSE which interfaces with the aircraft passenger doors should have platforms of sufficient width that will allow the aircraft doors to be opened/closed with the equipment in place and the safety rails deployed.</p> <p>7. When positioning equipment (GSE), use a guide person. Ensure the guide person is in a</p>		<p>1. Define the rules to be followed for all equipment approaching their aircraft, including but not limited to speed, brake checks, situations where a guide person is needed, clearance from the fuselage and equipment chocking.</p>

Activity	GH organisation	Aerodrome operator	Aircraft operator
	<p>position to accurately judge clearances and communicate signals to the driver/operator. Stop immediately when visual contact with the guide person is lost.</p> <p>8. A guide person is not required if the equipment is fitted with systems (e.g. sensors) that enable the operator to accurately judge clearances and properly position it to and from the aircraft.</p>		
General safety during aircraft fuelling operations	<ol style="list-style-type: none"> 1. Ensure that personnel are aware of and take precautions during fuelling operations, safety zones, use of portable electronic devices and sources of ignition, connection of electrical equipment to the aircraft, parking restrictions and emergency procedures including fuel spillages. 2. Provide specific training to personnel on safety measures applicable during fuelling with passengers on board. 3. Verify the application of safety measures, in particular the provision of clear areas for the deployment of evacuation slides. 4. Apply aerodrome procedure for safety of apron during fuelling operations as per Reg. (EU) 139/2014. 	<ol style="list-style-type: none"> 1. Ensure that all personnel working on apron areas are aware of the safety requirements of Reg. (EU) 139/2014 on safety of apron during aircraft fuelling and defueling operations. 	<ol style="list-style-type: none"> 1. Develop policies and procedures for basic safety during fuelling, including precautions for fuelling with passengers on board. 2. Determine aircraft emergency exits 3. Clarify permission to board or disembark passengers including PRM during refuelling 4. Ensure the operator procedures do not contradict the aerodrome procedures for safety of apron operations during fuelling.
Adverse weather conditions	<ol style="list-style-type: none"> 1. Ensure that its personnel are aware of hazards and precautions to take during adverse weather conditions and that notice of such conditions is communicated to front-line personnel in an effective and timely manner 	<ol style="list-style-type: none"> 1. Establish procedures to ensure the safety of aerodrome operations in adverse weather conditions and ensure GH organisations follow them. 2. Ensure that relevant information on adverse weather 	<ol style="list-style-type: none"> 1. Develop policies and procedures for the ground handling of their aircraft during adverse weather conditions.

Activity	GH organisation	Aerodrome operator	Aircraft operator
		<p>conditions is provided to aerodrome users in a timely manner, as well as any applicable restrictions to the operations, such as low visibility.</p>	
General awareness of dangerous goods	<ol style="list-style-type: none"> 1. Ensure that its personnel are qualified to identify, handle and load dangerous goods as required by their responsibilities in the operation. 2. Have procedures to ensure dangerous goods incidents and accidents are reported as required. 	<ol style="list-style-type: none"> 1. Have procedures in place to respond to incidents involving dangerous goods. 	<ol style="list-style-type: none"> 1. Develop policies and procedures for the carriage of dangerous goods on their aircraft.
Turnaround coordination	<ol style="list-style-type: none"> 1. GH Organisation should ensure turnaround coordination and apply the aircraft operator's turnaround plan. 2. A turnaround coordination function should facilitate adherence to the plan 		<ol style="list-style-type: none"> 1. Aircraft operators should provide the GH organisation with a turnaround plan. 2.
Load planning	<ol style="list-style-type: none"> 1. Execute load planning in accordance with the aircraft operator procedures and instructions, when this service is outsourced. 		<ol style="list-style-type: none"> 1. Develop procedures in accordance with the air ops requirements to include mass&balance calculations, load planning, production of a Load Instruction/Report, finalization of a load sheet, last minute changes and special load NOTOC, as applicable. 2. Ensure any verbally received load information, which could affect aircraft mass and balance, is documented and communicated to the person

Activity	GH organisation	Aerodrome operator	Aircraft operator
			<p>responsible for final calculation of weight and balance prior to each flight.</p> <p>3. Provide instructions for aircraft loading and unloading per aircraft type .</p>
Aircraft arrival	<ol style="list-style-type: none"> 1. Position the personnel performing the turnaround away from hazard zones. 2. GSE required for aircraft handling should be available, serviceable and positioned well clear of the aircraft path, normally outside the equipment restraint area. 3. Personnel in charge of arrival to conduct FOD check on stand prior to aircraft arrival. 4. Ensure that the emergency procedures are understood and the equipment and infrastructure to be used is serviceable. 5. If the GH organisation provides marshalling service, it should agree with the aerodrome operator. 6. Standard hand signals and agreed phraseology (if applicable) to be used for all communication between flight crew and ground personnel in accordance with Part-SERA. 7. Marshallers and wing walkers to be distinguishable to the flight crew and utilise during daytime operations either wands or mitts, of a high visibility colour, or during low visibility/night operations lighted wands. 8. Ensure the personnel understand the use of aircraft anti-collision lights. When an aircraft has an unserviceable APU, specific procedures to be followed to connect the 	<ol style="list-style-type: none"> 1. Ensure that the allocated stand is serviceable and suitable for the aircraft characteristics. 2. Communicate to the GH organisation the initially allocated stand and any changes in a timely manner. 3. When aircraft marshalling is performed by an apron management service provider or aerodrome operator, establish clear procedures for handover of parked aircraft to the GH organisation for necessary GH services. 	<ol style="list-style-type: none"> 1. Ensure that the phraseology, signals and procedures regarding communication between GH organisation personnel and flight deck for arrival are established (for marshalling, pushback and towing in accordance with Part-SERA), practiced and used by flight crew when communicating with GH personnel and vice versa. 2. Ensure that procedures for aircraft ground movement are established, including: actions before arrival, standard arrival procedure, use of GSE, danger areas, back-up communications.

Activity	GH organisation	Aerodrome operator	Aircraft operator
	<p>ground power prior to anti-collision lights switched-off.</p> <p>9. Ensure that required number of serviceable chocks are available for the aircraft to be chocked. The aircraft should not be approached to position the nose wheel chocks until the aircraft has come to a complete stop. Personnel should notify the flight deck crew that the chocks are inserted.</p>		
Passenger boarding bridges (PBB) and passenger stairs	<p>1. Ensure that personnel operating a PBB or passenger stairs are trained and competent to do so and familiar with the safety features of the equipment they are operating.</p>	<p>1. Make available training standards and procedures for the usage of each type of PBB operated at the airport.</p> <p>2. Ensure that any third-party operating PBB is trained to do so, according to the established training programme.</p>	<p>1. Develop policies and procedures for the use of PBB and stairs on their aircraft, including operation of doors and communication with the cabin crew.</p>
Ground power and pre-conditioned air units	<p>1. Ensure that personnel operating mobile or fixed ground power and pre-conditioned air units are qualified and familiar with the features of the equipment they are operating.</p>	<p>1. Make available training material and procedures for the usage of fixed ground power and pre-conditioned air units.</p> <p>2. Ensure that fixed ground power and pre-conditioned air units are serviceable and adapted to the aircraft requirements.</p> <p>3. Ensure that any equipment that is inoperable is removed from the service immediately and notified to the users.</p>	<p>1. Develop policies and procedures for the use of ground power and pre-conditioned air on their aircraft, including sequencing and communication with the flight and cabin crew</p>

Activity	GH organisation	Aerodrome operator	Aircraft operator
Loading and unloading	<ol style="list-style-type: none"> 1. Ensure that personnel assigned to perform loading and unloading functions are qualified. This includes manual handling, understanding of loading instruction form and loading report, report the final load including deviations, ULD serviceability, aircraft hold inspection and other characteristics such as tipping tendency. 	<ol style="list-style-type: none"> 1. Ensure that ULD can be stored in a safe and convenient place within the airport area 	<ol style="list-style-type: none"> 2. Develop policies and procedures for the loading and unloading of the aircraft, which might include operation of cargo doors. Load classifications and priorities, sequencing, load securing, special precautions for aircraft hold fire detection systems and special loads such as live animals, dangerous goods, urgent aircraft parts and other aircraft operator materials.
Elevating equipment (for cargo and catering loading/unloading)	<ol style="list-style-type: none"> 1. Ensure that personnel operating elevating equipment are qualified to do so and familiar with the features of the equipment they are operating. 		<ol style="list-style-type: none"> 1. Develop policies and procedures for the use of elevating equipment on their aircraft, such as use of chocks / stabilizers, proximity restrictions and doors operation.
Toilet and potable water servicing	<ol style="list-style-type: none"> 1. Ensure that personnel performing toilet and potable water servicing are qualified to do so and familiar with the features of the equipment they are operating. 	<ol style="list-style-type: none"> 1. Provide facilities to uplift potable water and dispose of aircraft toilet waste. 2. Coordinate with the GH organisation to ensure that adequate procedures are in place to manage any spillages during toilet servicing in accordance with local health, safety and environmental regulations. 	<ol style="list-style-type: none"> 1. Develop policies and procedures for toilet and water servicing, including liquid quantities required for specific aircraft potable water and toilet configurations.

Activity	GH organisation	Aerodrome operator	Aircraft operator
Air start unit	<ol style="list-style-type: none"> 1. Ensure that personnel performing air start procedures are qualified to do so and familiar with the features of the equipment they are operating. This includes precautions for correct and safe connection to the aircraft, operator communication with the flight crew and other team members. 	<ol style="list-style-type: none"> 1. In the case of air start engine start up on the stand, establish special precautions regarding jet blast. 	<ol style="list-style-type: none"> 1. Establish policies and procedures for the use of an air start unit on its aircraft.
Aircraft departure	<ol style="list-style-type: none"> 1. Ensure protection against jet blast and engine ingestion effects 2. Ensure personnel performing aircraft departure procedures are qualified for the method being utilised (push back, taxi-out or power back) and familiar with the features of any equipment they are operating. This should include: <ol style="list-style-type: none"> a. Aircraft pre-departure inspection b. Pre-departure stand check, including FOD inspection. c. Use and removal of aircraft steering bypass pin. d. Maximum gear turn limits. e. Airport infrastructure limitations. 	<ol style="list-style-type: none"> 1. Ensure protection against jet blast and engine ingestion effects are in place, where applicable. 2. In coordination with ANS and AMS, consider the development of standard push back procedures for the movement of aircraft on aprons and taxiways. 	<ol style="list-style-type: none"> 1. Develop policies and procedures for the safe departure of their aircraft from the stand. 2. Ensure that phraseology, signals and procedures regarding communication between ground and flight deck related to the departure are established, practiced and used by flight crew when communicating with ground staff and vice versa.
Aircraft Towing/Pushback	<ol style="list-style-type: none"> 1. Ensure that personnel performing towing/pushback procedures are qualified to do so and are familiar with the features of any equipment they are operating. 2. Ensure proper link with the apron management service provider. Ensure compliance with the applicable SERA requirements. 3. Ensure personnel are aware of aerodrome/ATC rules for the specific routes being used. 	<ol style="list-style-type: none"> 1. Consider development of standard aircraft towing routes and procedures in coordination with Air Navigation Services and Apron Management Services. 2. The use of anti-collision lights and communication with ATC, for movements on 	<ol style="list-style-type: none"> 1. Develop policies and procedures for towing of their aircraft, including: <ol style="list-style-type: none"> a. Type of towing equipment suitable to aircraft type. b. Connection and disconnection of equipment to the aircraft. c. Communication between the ground and the flight deck.

Activity	GH organisation	Aerodrome operator	Aircraft operator
		aprons and taxiways.	d. Use of anti-collision lights (as per Part-SERA) and emergency procedures.
Aircraft de-icing and anti-icing	<ol style="list-style-type: none"> 1. Ensure that personnel performing aircraft de-icing and anti-icing procedures are qualified to do so and are familiar with the procedures applicable to fluids or forced air operations and any equipment they are operating. 2. When responsible for the storage or handling of de-icing and anti-icing fluids, ensure that pre-season, receipt, truck filling and other required quality assurance checks are performed, and that fluid meets the specifications prior to being used in operations. 3. Receive and apply instructions from aircraft operator about who will conduct Post De-icing Check. 4. Ensure that when storing or handling de-icing/anti-icing fluid, pre-season, receipt and other required quality assurance checks are performed. 	<ol style="list-style-type: none"> 1. Define the location and facilities used for aircraft de-icing and anti-icing on the airport. 2. Develop or ensure that procedures are in place for the collection and safe disposal of de-icing and anti-icing fluids. 	<ol style="list-style-type: none"> 1. Develop policies and procedures for de-icing and anti-icing, including methods, types of fluids to be used, restrictions on the application of the fluids, communication between flight crew and de-icing personnel, and reference to holdover time. 2. Agree and instruct GH organisation about who will conduct Post De-icing Check. 3. Ultimate responsibility for the aircraft remains with the commander/pilot—in-command as per Reg. (EU) 965/2012.

GM1 GH.OPS.020(b) Handling of dangerous goods

RESPONSIBILITY OF THE GH ORGANISATION

- (a) The GH organisation is required to comply with the requirements of the GH Regulation. The GH Regulation does not require the approval of a GH organisation's training programme by the competent authority.
- (b) Regulation (EU) 965/2012 requires that the dangerous goods training programme of an aircraft operator is approved by its competent authority. Additional requirements on a specific approval apply to an aircraft operator if it transports dangerous goods by air.
- (c) An aircraft operator may contract the handling of dangerous goods to an external GH organisation. In this case, the operator has to comply also with the requirement regarding its contracted activities (ORO.GEN.205 of Reg. (EU) 965/2012). This means that the aircraft operator has to ensure that the GH organisation providing services at an EU aerodrome is a

declared organisation. The GH organisation may be asked to prove to the aircraft operator that it complies with the GH Regulation as far as dangerous goods are concerned.

SUBPART 1 – PASSENGER HANDLING

AMC1 GH.OPS.100 Passenger handling

PASSENGER HANDLING — PASSENGERS WITH REDUCED MOBILITY (PRM)

- (a) The safety training and safety operational procedures for PRM services, including the transportation of their mobility devices, should address the following key risk areas:
- (1) communication of safety relevant information:
 - (i) transmission of relevant information from the aircraft operator to the aerodrome operator or the different organisations involved in the handling of PRM and preparation of their mobility aids for air transport;
 - (ii) information about the type of battery in the mobility device, instructions for battery disconnection or removal;
 - (iii) correct information to the commander/pilot-in-command;
 - (2) boarding/disembarking of PRM to prevent injuries to persons and damage to the aircraft, mobility device and GSE:
 - (i) use of adequate GSE (ambulift, medilift) for boarding and disembarkation;
 - (ii) correct operation of the GSE for boarding and disembarkation of PRM;
 - (iii) prevent obstruction of the passenger boarding bridge during boarding/disembarkation because of massed carry-on baggage and queueing mobility devices;
 - (3) preparation of the mobility device for safe transport:
 - (i) dangerous goods training;
 - (ii) packaging and loading of the mobility device in compliance with ICAO TI and to prevent short-circuits of the battery in the mobility device during flight;
 - (4) compliance with the aircraft operator instructions on mass and balance regarding loading and securing of the mobility device in the cargo compartment:
 - (i) applicable aircraft loading limitations;
 - (ii) applicable load-spreading instructions;
 - (5) adequate planning reflected in the turnaround coordination activities;
 - (6) compliance with the aerodrome operator instructions in accordance with Regulation (EC) No 1107/2006.
- (b) Each organisation involved in the handling of PRM and their mobility devices should take responsibility for the above-mentioned activities when they are performed by their own personnel.

GM1 GH.OPS.100 Passenger handling

PASSENGERS WITH REDUCED MOBILITY (PRM)

- (a) The responsibility to ensure the provision of assistance to PRM at the airport remains with the aerodrome operator in accordance with Regulation (EC) No 1107/2006. That Regulation also specifies the possibility that the assistance services are provided by the aerodrome operator or contracted to another provider.
- (b) Likewise, the responsibility for adequate training for personnel remains with the aerodrome operator as specified by Regulation (EC) No 1107/2006.
- (c) This Regulation does not contradict or duplicate any applicable requirements regarding the rights of PRM when travelling by air.
- (d) Additional guidelines may be found in the ECAC [Code of good conduct in ground handling for persons with reduced mobility](#) and ECAC *Policy statement in the field of civil aviation facilitation (Doc No 30 Part I, section 5)*.

AMC1 GH.OPS.100(c) Passenger handling

GROUND TRANSPORTATION OF PASSENGERS

To demonstrate compliance with this Regulation when providing services related to ground transportation of passengers, the GH organisation should ensure the following:

- (a) inclusion of this activity in its safety management system in accordance with ORGH.MGM.200,
- (b) implementation of the applicable requirements of Subpart ORGH.GSE of this Regulation,
- (c) compliance with the applicable requirements of Regulation (EU) 139/2014 regarding the authorisation of vehicle drivers and their training, authorisation of vehicles, operation of vehicles, and marking and lighting of vehicles.

GM2 GH.OPS.100 Passenger handling

SAFETY RISK MITIGATIONS FOR CHANGES IN THE AIRCRAFT CENTRE OF GRAVITY DURING PASSENGER BOARDING OR DISEMBARKING

Changes in the aircraft centre of gravity during boarding/disembarking may lead to the aircraft nose lifting up, causing issues and potential injuries to passengers/crew, damage to the GSE docked to the aircraft or result in an aircraft tail tipping.

- (a) The operational procedure for passenger boarding and disembarking should cover the following key risk areas:
 - (1) aircraft damage by the GSE docked to the aircraft (passenger boarding bridge, passenger stairs);
 - (2) aircraft tail tipping;
 - (3) movement of the aircraft centre of gravity too far aft;
 - (4) passengers and aircrew getting injured due to aircraft pitch angle changes;
 - (5) damage to the GSE docked to the aircraft.

- (b) The operational procedure for passenger boarding and disembarking should consider synchronising the cargo loading/unloading with the passenger boarding/disembarking to maintain a forward centre of gravity.
- (c) The aircraft loading personnel should be trained to recognise early signs of aircraft centre of gravity moving too aft and the corrective actions to take.

GM1 GH.OPS.100(b) Control of passengers on the apron

SAFETY RISK MITIGATIONS FOR PASSENGERS ON THE APRON FOR BOARDING AND DISEMBARKATION

- (a) Walkways process should not be conducted:
 - (1) when the aircraft is being refuelled simultaneously with passenger boarding in the adjacent stand of the passenger boarding side;
 - (2) boarding is in progress in the adjacent gate using the ramp bus;
 - (3) adverse weather conditions (thunderstorms lightning, snow-ice, strong winds, heavy rain, fog, etc.) are anticipated or prevailing over the airport;
 - (4) emergency situation is in progress.
- (b) Proposed mitigation actions:
 - (1) adequate number of GH personnel to monitor passenger movement on the apron;
 - (2) use of markings and walking path for pedestrian use.

SUBPART 2 – BAGGAGE HANDLING

[placeholder]

SUBPART 3 – AIRCRAFT SERVICING

AMC1 GH.OPS.300(a) Safety on the apron

SAFETY RISK MITIGATIONS FOR GH OPERATIONS IN ADVERSE WEATHER CONDITIONS

- (a) The operational procedures should cover the following key risk areas:
 - (1) ground collision between or with equipment, vehicles, aircraft,
 - (2) aircraft upset,
 - (3) taxiway/apron excursions,
 - (4) environmental impact due to use of anti-icing chemicals,
 - (5) taxiway incursions,
 - (6) injuries to persons,

- (7) fire caused by thunderstorms.
- (b) The procedures should cover at least the following situations:
 - (1) slippery apron conditions,
 - (2) storms, lightning, heavy rain
 - (3) high winds,
 - (4) low visibility,
 - (5) volcanic ash,
 - (6) intense heat,
 - (7) winter conditions including freezing,
 - (8) working in confined spaces (e.g., the aircraft cargo compartment) in extreme temperatures.

AMC1 GH.OPS.305(b) Operation of ground support equipment

AERODROME MOVEMENT AREA CHART

The GH organisation should ensure an updated copy of the movement area chart of sufficient size, including hot spots, is readily available in the driver's cabin of each vehicle used for ground handling operations on the movement area.

AMC1 GH.OPS.300(b)(3) Safety on the apron

SAFETY RISK MITIGATIONS FOR PERSONNEL MOVEMENT AROUND THE AIRCRAFT WHILE ENGINES ARE RUNNING OR AIRCRAFT IS ABOUT TO MOVE, ANTI-COLLISION BEACON IS ON

- (a) The safety operational procedures and safety training should cover the safety risks of the following activities:
 - (1) chocking of aircraft;
 - (2) provision of ground power unit when the aircraft APU is inoperative;
 - (3) other circumstances explicitly described in the GH organisation's ground handling manual.
- (b) The operational procedures should provide mitigations for the following risk areas as a minimum:
 - (1) inoperative beacon or beacon not turned on – proper communication between cockpit and ground or an alternative procedure should be ensured;
 - (2) use of beacon lights by the flight crew other than for the intended purpose when the startup clearance is given by the ATC but the GH operations tasks have not been complete;
 - (3) poor communication cockpit/ground before aircraft door opening/closing;
 - (4) insufficient chocking or poor communication leading to aircraft accidentally rolling;
 - (5) lack of signal for "Aircraft under movement", since the beacon is only intended for "Engine running". It implies risk for pushback/towing operations; additional signal for 'aircraft under movement' should be established and communicated to the personnel involved;

- (6) lack of coordination between staff and GSE during turnaround (fuelling, catering, PRM, etc.);
- (7) securing of GSE.

GM1 GH.OPS.305 Operation of ground support equipment – general

USE OF A GUIDE PERSON

- (a) It is recommended to use a guide person when positioning the GSE.
- (b) The procedure for the operation of GSE when using a guide person should ensure the following aspects, as a minimum:
 - (1) ensure the guide person is in a position to accurately judge clearances and communicate signals to the driver/operator;
 - (2) stop immediately when visual contact with the guide person is lost.
- (c) A guide person is not necessary if the GSE is equipped with systems (e.g., sensors) that enable the operator to accurately judge clearances and properly position it to and from the aircraft.

GM2 GH.OPS.305 Operation of ground support equipment – general

SAFETY RISK MITIGATIONS FOR THE OPERATION OF GSE

- (a) Incorrect operation of motorised and non-motorised GSE on the aerodrome movement area may lead to collisions between the aircraft and motorised/non-motorised GSE, aircraft or vehicle damage, and injuries to personnel or passengers.
- (b) Correct operation of motorised/non-motorised GSE following effective training and the correct use of effective procedures and processes includes the movement of the equipment around the aircraft, as well as the selection of appropriate equipment for the GH service or task.
- (c) The procedures and training for the operation of GSE should provide mitigations to cover the following risks:
 - (1) understanding the specific risks on the aerodrome apron and the differences between the risks of driving on the aerodrome movement area vs driving in 'normal traffic';
 - (2) training on specialised GSE, heavy GSE, and their specific behaviour and risks in the proximity of aircraft;
 - (3) application of procedures regarding the driving speed, GSE guidance, brake tests, and no-touch policy;
 - (4) adequate turnaround coordination of GH services and GSE used for those services to prevent aircraft collision or collision between GSE considering the operational context at the aerodrome;
 - (5) positioning or securing of GSE so as to prevent it from being moved inadvertently during adverse weather conditions;
 - (6) proper visibility of vehicles and GSE;
 - (7) adequate lighting and marking of the GSE in any conditions, in compliance with the instructions established by the aerodrome operator;
 - (8) operation of GSE in adverse weather conditions including poor friction and snow banks;

- (9) compliance with the aerodrome operator instructions and procedures regarding driving and the ATC clearances;

GM3 GH.OPS.305 Operation of ground support equipment – general

SAFETY RISK MITIGATIONS FOR OPERATING GSE IN ADVERSE WEATHER CONDITIONS

The GH organisation should ensure that the operational procedures and the procedures for GSE operation address operation in adverse weather conditions, such as, for example,

- (a) ensuring visible lights to the GSE,
- (b) additional guidance of vehicles around the aircraft and during pushback or towing in low visibility conditions,
- (c) proper GSE maintenance during winter operations, extensively hot or humid weather,
- (d) increased securing and enhanced positioning measures of GSE,
- (e) refresher training of GH personnel.

GM4 GH.OPS.305 Operation of ground support equipment – general

SAFETY RISK MITIGATIONS FOR THE OPERATION OF PASSENGER BOARDING BRIDGES (PBBs)

- (a) The operation of PBBs, if done incorrectly, may lead to collisions between aircraft and PBBs or injuries to personnel or passengers. Correct operation of PBBs includes operation of different models of PBBs or air bridges with possible differences in controls.
- (b) The operational procedures and training should mitigate the safety risks arising from the following situation:
 - (1) operating new or different models of PBBs;
 - (2) operating PBBs with many different instructions depending on airlines (various gap requirements and touch/ no-touch policy);
 - (3) operation of multiple PBBs for the same aircraft;
 - (4) personnel operating the GSE is trained to identify malfunctions, recognition of sensors indicating issues of GSE serviceability;
 - (5) adequate parking of PBBs in the designated areas and securing on the ground against unintended movement.

GM1 GH.OPS.305(d) Operation of ground support equipment – general

NO-TOUCH POLICY

This policy refers to the minimum distance to which the GSE can approach the aircraft to ensure full operational functions without touching the aircraft, in order to avoid producing any damage to the fuselage.

AMC1 GH.OPS.310 Aircraft refuelling and defueling

REFUELLING AND DEFUELING OPERATIONS

- (a) When several GH organisations perform different aircraft handling services, including fuelling and defueling performed by an into-plane fuelling agent, the GH organisations should have and apply common procedures to ensure the following risks are properly mitigated:
 - (1) fire,
 - (2) injuries to persons, damages to the aircraft, vehicles or buildings,
 - (3) fuel spillage,
 - (4) damage to the environment by contamination or fire,
 - (5) loading the wrong fuel quantity,
 - (6) refuelling the aircraft with the wrong fuel type or with contaminated or deteriorated fuel,
 - (7) prevent access of passengers or unauthorized persons into the refuelling area.
- (b) The procedure should also address the interaction and communication with the provider of the into-plane fuelling services at the aircraft during turnaround and refuelling operations. The purpose is to ensure safety of operations during turnaround, smooth coordination of actions and evacuation in case of an emergency, while maintaining compliance with the aerodrome operator procedures and aircraft operator procedures for aircraft refuelling.
- (c) The designated emergency exits and escape routes are kept free of obstacles during refuelling with passengers on board, embarking or disembarking.

GM1 GH.OPS.310 Aircraft refuelling and defueling

RECOMMENDED GUIDANCE FOR REFUELLING AND DEFUELLING

The following documents and industry standards and good practices may be used:

- (a) The ICAO Doc 9977 'Manual on Civil Aviation Jet Fuel Supply'
- (b) The standards and instructions put forward under the Joint Inspection Group (JIG) in relation to the aviation fuel supply standards (JIG 1 Aviation Fuel Quality Control and Operating Standards for Into-Plane Fuelling Services; JIG 2 Aviation Fuel Quality Control and Operating Standards for Airport Depots and Hydrants; JIG 4: Aviation Fuel Quality Control and Operating Standards for Smaller Airports).
- (c) The refuelling organisation's own procedures.
- (d) For the ground crew supervising the refuelling, the procedure should be aligned with the aircraft operator procedure and should ensure that the ground crew supervising the refuelling operations meet at least the following conditions:
 - (1) are trained in communication method(s) used and their responsibilities;
 - (2) warn the qualified person on board of fire, advice on which exits to use during evacuation;
 - (3) stop refuelling if the aircraft exits are blocked, there is fuel spillage, or there are other risks identified.

GM2 GH.OPS.310 Aircraft refuelling and defueling

INTERFACES WITH AIRCRAFT OPERATOR AND AERODROME OPERATOR RESPONSIBILITIES

The GH organisation should ensure that its specific responsibilities for refuelling and defueling operations are aligned with the following procedures, which establish the responsibilities of the other stakeholders involved in these activities, as follows:

- (a) According to Regulation (EU) 965/2012, the aircraft operator is responsible to provide the GH organisation with fuelling instructions and procedures, including:
 - (1) safety precautions during refuelling and defueling including when an aircraft auxiliary power unit is in operation or, for helicopters, when rotors are turning or, for aeroplanes, when an engine is running;
 - (2) refuelling and defueling while passengers are embarking, on board or disembarking; and
 - (3) precautions to be taken to avoid misfuelling.
- (b) According to Regulation (EU) 139/2014, the aerodrome operator is also responsible to establish a procedure related to the safety of operations on the apron during refuelling/defueling and ensure that the other organisations involved are observing that procedure.

AMC1 GH.OPS.310(b)(3) Aircraft refuelling and defueling

FUELLING SUPERVISOR

The refuelling supervisor's role is to ensure the safety of aircraft and apron during refuelling operations.

- (a) The fuelling supervisor should be present on the apron whenever a fuelling operation takes place at the aircraft. The fuelling supervisor should be in the area where refuelling takes place so that they can have direct visual on the refuelling operation and the person in the flight crew compartment.
- (b) The person assigned on this role should receive, as a minimum, the following training:
 - (1) supervision of refuelling operations,
 - (2) SMS commensurate to their tasks and responsibilities,
 - (3) dangerous goods,
 - (4) knowledge of the aircraft type necessary for refuelling/defueling tasks,
 - (4) apron safety,
 - (5) aircraft operator procedures for refuelling and/or defueling,
 - (6) aerodrome operator's local procedure for apron safety during fuelling operations.
- (c) A cumulation of several roles on the apron may be possible if the person is qualified and competent for all assigned roles and meets the conditions of the refuelling supervisor's tasks listed here.
- (d) The refuelling supervisor may be assigned either by the refuelling agent, the GH organisation or the aircraft operator. The organisation that assigns this person should inform the other organisations involved in fuelling operations accordingly.

AMC1 GH.OPS.335(a) Aircraft de-icing and anti-icing – operations

PREPARATION FOR THE COLD SEASON

The GH organisation should coordinate with the aerodrome operator and the aircraft operators sufficient time in advance of the cold season to prepare the de-icing/anti-icing operations. The plan for the winter season should be communicated to all stakeholders concerned.

GM1 GH.OPS.335(a) Aircraft de-icing and anti-icing – operations

PREPARATION OF DE-ICING/ANTI-ICING OPERATIONS IN COORDINATION WITH THE STAKEHOLDERS CONCERNED

- (a) Coordination should include the following elements of all stakeholders involved, as a minimum:
 - (1) aligning the documents/procedures/manuals covering cold season operations;
 - (2) local procedures at the aerodrome of operation, including instructions and procedures for cold weather operations.
- (b) Pooling of resources for de-icing/anti-icing operations should be enabled whenever feasible and efficient.
- (c) The following components should be ensured or checked, as a minimum:
 - (1) GSE, remote de-icing pads verified for serviceability; preventive maintenance of GSE;
 - (2) proper visibility of GSE in winter conditions;
 - (3) update/refresher training of GH personnel;
 - (4) availability of de-icing/anti-icing fluids;
 - (5) fluid quality checks;
 - (6) prevention of contamination with glycol.
- (d) When possible, the adverse weather plan should be tested.

GM1 GH.OPS.335 Aircraft de-icing and anti-icing – operations

ROLES AND RESPONSIBILITIES

The GH organisation should define the responsibilities for de-icing/anti-icing activities using the ICAO Manual of Aircraft Ground De-Icing/Anti-Icing Operations (Doc 9640) and the existing industry standards and good practices SAE AS6285:

- (a) The safety and operability of the designated de-icing facilities.
- (b) Apply the aircraft ground de-icing/anti-icing procedures specific to the aircraft type.

The procedures, which ensure compliance with the relevant regulations and global aircraft de-icing standards such as AS6285, AS6286, and AS6332, should cover all aspects of the aircraft ground de-icing/anti-icing process, including (but not limited to) instructions, tasks, responsibilities, authorisations, and infrastructure for the de-icing/anti-icing process as follows:

- (1) Use of suitable de-icing/anti-icing treatment method according to SAE AS6285.
- (2) Remote de-icing/anti-icing instructions, when applicable.

- (3) Sufficient number of trained and competent de-icing/anti-icing personnel.
- (4) Qualified staff to coordinate and supervise the de-icing/anti-icing treatments.
- (5) Use of suitable de-icing/anti-icing equipment meeting the specification of ARP1971.
- (6) Special handling procedures for Type II, III, and IV de-icing/anti-icing fluids to maintain quality.
- (7) Post-de-icing/anti-icing check, when applicable.
- (8) Protocol for communications with the flight crew for the gate and, when applicable, remote locations.
- (9) Reporting the anti-icing code to the flight crew, when applicable.
- (10) Documentation of all de-icing/anti-icing treatments.
- (11) Personnel safety arrangements.
- (12) Provisions for tools and clothing for de-icing/anti-icing personnel.
- (13) Environmental arrangements.
- (14) A quality control programme.

AMC1 GH.OPS.335(b) Aircraft de-icing and anti-icing – operations

DE-ICING/ANTI-ICING FLUID QUALITY CONTROL

- (a) Fluid quality control should be carried out for each sample taken as follows:
 - (1) visual inspection: colour, solid particles (small amounts of rust, sand, paint chips, etc.);
 - (2) refractive index measurement to check the concentration of glycol in the water;
 - (3) checking the pH to identify whether the liquid is neutral or slightly basic ($\text{pH} = 7 \rightarrow$ neutral pH (neutral solution); $7 < \text{pH} \leq 14 \rightarrow$ alkaline pH (basic solution));
 - (4) viscosity check (only for types II, III and IV liquids) according to the method indicated by the fluid manufacturer.
- (b) The GH organisation should record the following information:
 - (1) date of receipt,
 - (2) type of fluid,
 - (3) name and batch number of the fluid received,
 - (4) number/date of the delivery note and certificate of analysis/certificate of conformity,
 - (5) identification numbers of the seals in correspondence with the number of containers (if delivery was made in more than one container),
 - (6) confirmation of the verification of the seals,
 - (7) results of the quality control.
- (c) The following quality checks should be carried out during the storage period between seasons and before the start of the cold season:
 - (1) for type I liquid, visual inspection, refractive index, pH, before the start of the cold season or earlier if degradation/contamination is suspected;
 - (2) for types II, III and IV liquids:

- (i) before the start of the cold season, the following should be carried out: visual inspection, refractive index, pH, viscosity in the laboratory;
- (ii) samples for viscosity determination are taken from the storage tank/containers (by sampling from the common batch), from the tanks of the deglazers used and from the nozzles of the de-icing vehicles adjusted to the pressure, flow rate and shape of the working jet, at all concentrations used;
- (iii) laboratory sample containers should be labelled, noting down the following information:
 - (A) name and batch number of the fluid,
 - (B) identification of the location from which the sample was taken (storage tank number, de-icing vehicle tank number, or de-icing vehicle nozzle number),
 - (C) flow rate and jet shape (dispersed, medium or concentrated),
 - (D) concentration,
 - (E) date of sampling.
- (3) the results of the checks shall be recorded.
- (d) During the cold season, when de-icing/anti-icing activities are carried out, quality controls should be carried out as follows:
 - (1) daily, before use and after each filling of the de-icing vehicle tank, the refractive index should be checked on samples taken from the de-icer nozzle if water/liquid mixing is done before the nozzle or from the de-icing vehicle tank if it is not provided with its own mixing system;
 - (2) the results obtained should be recorded.

GM1 GH.OPS.335(b) Aircraft de-icing and anti-icing – operations

DE-ICING/ANTI-ICING FLUID STORAGE FACILITIES

- (a) The storage facilities for de-icing/anti-icing fluids should be:
 - (1) dedicated to de-icing/anti-icing fluid to avoid any contamination with other products;
 - (2) built of materials compatible with the de-icing/anti-icing fluid as specified by the fluid manufacturer, bearing in mind that the anti-icing performance of Type II, III and IV fluids may be impaired by:
 - (i) mechanical shear stress on the molecules during pumping,
 - (ii) corrosion,
 - (iii) heat,
 - (iv) ultraviolet rays;
 - (3) labelled, visibly and clearly, to avoid contamination, as follows:
 - (i) tank: type, name and lot number of liquid stored, manufacturer, dates of last inspection/cleaning of tank;
 - (ii) dedicated transfer lines and filling ports: type of liquid and manufacturer;
 - (4) inspected annually; if corrosion or contamination is evident, tanks should be brought up to standard (cleaned, reconditioned) or replaced.

- (b) Quality controls of de-icing/anti-icing fluids should be carried out on reception, during storage and use, to check the glycol concentration in the water and to keep it within product specifications.

GM1 GH.OPS.345 Ground handling of aircraft using alternative energy sources of propulsion

Elements specific to the type of energy should be considered in the risk assessment. Such elements could be:

- (a) additional infrastructure for carrying the energy container from the storage area to the aircraft (e.g. underground pipeline system),
- (b) necessary dispensers, etc.

SUBPART 4 – AIRCRAFT TURNAROUND

GM1 GH.OPS.400 Coordination of aircraft turnaround activities

GENERAL

- (a) Aircraft turnaround coordination is crucial for the safety of operations on the apron and flight safety. Inadequate coordination of the turnaround process may have negative safety consequences particularly at highly congested aerodromes.
- (b) Turnaround coordination should cover the GH services provided to an aircraft between the moment when the aircraft leaves the centre line of the taxiway to park at a stand until it departs from the stand under its own power.
- (c) The turnaround coordination should address the following key risks:
 - (1) injuries to passengers around the aircraft by lack of coordination during passenger boarding/disembarking;
 - (2) accidents/incidents during take-off due to incorrect aircraft loading;
 - (3) damage to GSE/aircraft due to improper coordination between different GH organisations providing different GH services during turnaround;
 - (4) collision between vehicles or between vehicles and aircraft;
 - (5) Injury / death to GH personnel;
 - (6) jet blast incidents.

AMC1 GH.OPS.400 Coordination of aircraft turnaround activities

GENERAL

- (a) The aircraft turnaround activities may be coordinated by one or more persons or by means of a computerised system.

- (b) The following GH activities should be considered for the turnaround coordination, as agreed with the aircraft operator to which this service is provided:
- (1) aircraft arrival,
 - (2) GSE operation around the aircraft, including PBB, passenger stairs, and loading equipment for cargo operations,
 - (3) aircraft loading/unloading,
 - (4) passenger disembarkation and boarding, including passengers with reduced mobility,
 - (5) ground transportation of passengers, crews, baggage and cargo,
 - (5) aircraft refuelling,
 - (6) potable water, aircraft toilet servicing,
 - (7) catering unloading/loading,
 - (8) aircraft departure activities,
 - (9) aircraft pushback/towing,
 - (10) aircraft de-icing/anti-icing when not done at a remote stand,
 - (11) any other additional tasks requested by the aircraft operator,
 - (12) coordination and communication with the GH services indicated above and with Load Control,
 - (13) coordination and communication with the aircraft operator flight crew, aerodrome operator, and any other organisations involved in the GH activities and preparation of the flight, as the case may be.
- (c) The procedure for the turnaround coordination function should ensure safe and effective equipment staging areas on the apron. Effective configuration of stands should be coordinated with the aerodrome operator.
- (d) The turnaround coordination function should establish and implement a ground communications system and clear lines of communication with the organisations or persons responsible for the provision of various GH services to the same aircraft during turnaround.

AMC1 GH.OPS.405 Aircraft arrival

INSPECTION OF THE PARKING STAND

The GH organisation should ensure that the assigned parking stand is checked prior to aircraft arrival for the following:

- (a) FOD,
- (b) Stand surface conditions,
- (c) Stand free of GSE and personnel other than those required to assist the aircraft arrival at the aircraft stand, airbridge fully retracted.

GM1 GH.OPS.415(c) Aircraft loading and unloading

DOCUMENTS FOR AIRCRAFT UNLOADING

The unloading team should also have a copy of the inbound container pallet message (CPM) identifying the position of the ULD or pallet in the cargo compartments.

GM1 GH.OPS.415(d) Aircraft loading and unloading

AIRCRAFT CARGO COMPARTMENTS

- (a) As stated in the implementing rule the aircraft cargo compartments must be empty prior to loading.
- (b) As an exception from this requirement, an aircraft cargo compartment may contain a fly-away kit containing items and tools necessary for aircraft repairs, which is required by the aircraft operator to be carried on board on all flights. The fly-away kit may be carried in a customised ULD or in a different way. Other exceptions may include other equipment (equipment in compartment EIC), company mail (COMAIL) or company material (COMAT), or ballast.
- (c) The GH organisation should be aware if the aircraft operator instructions require that its fly-away kit is always carried on board its aircraft and should apply the operational procedure on aircraft loading and unloading accordingly.

GM1 GH.OPS.415 Aircraft loading and unloading

BAGGAGE AND CARGO LOADING AND UNLOADING

- (a) The procedures for aircraft loading and unloading should cover the following key risks, as a minimum:
 - (1) injuries to persons;
 - (2) damage to the aircraft;
 - (3) failure to communicate any last-minute changes to the persons responsible for the aircraft load planning and the aircrew, in accordance with the aircraft operator procedures;
 - (4) improper restraining and securing of load in the cargo compartment leading to changes in the aircraft centre of gravity or the actual weight of the aircraft due to load shifting during flight;
 - (5) use of inadequate ULD, restraint systems;
 - (6) failure to comply with the loading instructions, with a negative effect on the aircraft load limitations, spread limitations;
 - (7) unfamiliarity with the cargo compartment configuration;
 - (8) use of inadequate GSE for loading/unloading;
 - (9) for cargo aircraft only (CAO), additional risk areas may be:
 - (i) higher amount of DG in CAO;
 - (ii) larger and heavier or oversized freight and ULD (e.g., engines, cars, industrial equipment and machinery, large & heavy live animals, etc.);

- (iii) aircraft main deck as a complex loading hold with different positions and restrictions.
- (b) When different team leaders are used for inbound and outbound flights, they should ensure a formal and complete handover of tasks and briefing on special procedures or loading specificities.
- (c) The restraint equipment procedures and documentation should be aircraft type-specific and in accordance with the aircraft operator's instructions regarding aircraft mass and balance documentation.
- (d) The loading and unloading procedure should include a step covering gross error checks in securing of load and restraint devices.

AMC1 GH.OPS.415 Aircraft loading and unloading

SAFETY RISK MITIGATIONS FOR LOADING AND UNLOADING DANGEROUS GOODS

- (a) Procedures for aircraft loading/unloading
 - (1) Prevention of damage to packages, ULD (pallets and containers);
 - (2) Consolidation of dangerous goods to ensure segregation of incompatible dangerous goods and comply with the ICAO Technical Instructions;
 - (3) Separation and segregation of packages to prevent interaction between incompatible DG and other cargo;
 - (4) Prevention of movement during ground transport and during flight;
 - (5) Prevention of shipments labelled CAO (cargo aircraft only) from being loaded on passenger aircraft.
- (b) Procedures for damaged or leaking packages:
 - (1) it should not be loaded into an aircraft;
 - (2) it should be unloaded from the aircraft;
 - (3) in case of leakage in the cargo compartment, check for other contaminated packages and assess if they can be transported;
 - (4) apply any additional procedures, including reporting, of the aircraft operator and aerodrome operator;
 - (5) apply the procedure for the notification to captain (NOTOC) delivery to the commander/pilot-in-command.

GM1 GH.OPS.415(h) Aircraft loading and unloading

LOADING INSTRUCTIONS

The loading instructions are generated for the purpose of providing support to the person supervising the aircraft loading in order to facilitate this activity and ensure that the load distribution and aircraft loading are completed as per the instructions.

The loading instructions contain information about the maximum mass of load items that may be loaded in each cargo compartment and instructions for safe and optimal distribution of items to be loaded in the aircraft cargo compartments.

The confirmation that the aircraft has been loaded in accordance with the loading instructions is usually in the form of a signature by the person responsible for loading supervision, on the mass and balance documentation. A signed copy of this document is retained on the ground.

GM1 GH.OPS.420 Loading supervision

BRIEFINGS OF THE LOADING/UNLOADING TEAMS

The briefing should cover any of the following elements, as applicable:

- (a) special loads,
- (b) unloading/loading sequence,
- (c) load restraint details,
- (d) aircraft cargo compartment configuration or loading restrictions,
- (e) availability of necessary restraint/securing equipment,
- (e) any other element that is considered relevant taking into account the operational context.

AMC1 GH.OPS.420 Loading supervision

LOADING SUPERVISION

- (a) For loading of oversized cargo on cargo aircraft, the loading supervisor or loadmaster should be present for the entire loading process in order to ensure that it has been completed in accordance with the established procedures and the aircraft operator's procedures.
- (b) On completion of loading, the loading supervisor should sign the loading instructions document to confirm that loading has been completed in accordance with the instructions.

AMC1 GH.OPS.430 Aircraft departure activities

- (a) Safety risk mitigations for pre-departure activities:
 - (1) Pre-departure check of the aircraft and the stand to verify:
 - (i) stand is clear of FOD,
 - (ii) any GSE unnecessary for aircraft start and departure is removed, no persons in the hazard area,
 - (iii) there is no visible aircraft damage,
 - (iv) all aircraft doors and panels are closed.
 - (2) Correct pushback equipment for aircraft type/subtype
- (b) Departure activities:
 - (1) Application of the aerodrome requirements of ADR.OPS.D.040 'Aircraft departure from the stand'.
 - (2) Communication including phraseology / standard hand signals between flight crew and the person responsible for the departure operation.
 - (3) Engine start sequence agreed and followed. Operational procedures for the use of air start unit, if required, are applied.

- (4) Disconnection of the GSE (air start unit, ground power unit, etc.) and removal from the equipment restricted area.
- (5) Pushback or towing procedures include correct pushback or towing equipment for aircraft type/subtype and other conditions specific to the operational context.

GM1 GH.OPS.430(b) Aircraft departure activities

AWARENESS OF OTHER ORGANISATIONS INVOLVED IN AIRCRAFT DEPARTURE ACTIVITIES

- (a) Other organisations involved in the activities preparing the aircraft departure from the stand can be the aerodrome operator, the air traffic service provider, or the provider of apron management services.
- (b) The provider of apron management services is responsible for coordinating the radio communication with the ATC for parking, taxiing, pushback. Marshalling services – regardless of which organisation is doing them, will comply with Regulation (EU) 139/2014 as regards the training and with the hand-signs and communications from Regulation (EU) 923/2012.

GM1 GH.OPS.435 Aircraft towing and pushback

SAFETY RISK MITIGATIONS

Management, handling and coordination of the towing or pushback, if done incorrectly, may lead to collisions with other aircraft or ground vehicles/equipment and/or injuries to GH personnel. The aircraft towing or pushback procedures should cover the following:

- (a) means to develop and maintain situational awareness of traffic during aircraft towing/pushback operations;
- (b) communication between the towing/pushback vehicle driver and, if applicable, the wing-walker or the flight crew in the cockpit;
- (c) use of towing/pushback GSE adequate to the aircraft type;
- (d) use of methods to reduce risks caused by:
 - (1) multiple blind spots around the aircraft,
 - (2) wing-walker being struck by lightning via the cord,
 - (3) tripping hazard to the operator or snagging of machinery due to carrying a 15m long copper cable around,
 - (4) inadvertent brake application during towing by GH personnel,
- (d) consider using wireless communication if possible and ensure that communication from the cockpit is addressed to the correct ground crew performing the towing/pushback operation.

GM2 GH.OPS.435 Aircraft towing and pushback

PURPOSES OF AIRCRAFT TOWING

Aircraft towing may have different purposes:

- (a) maintenance – towing an aircraft, for maintenance purposes;

- (b) operational/dispatch – towing an aircraft to/from the terminal gate or parking area, to/from a remote location;
- (c) repositioning – the movement of an aircraft to/from remote parking purposes.

GM3 GH.OPS.435 Aircraft towing and pushback

AIRCRAFT WITH VERTICAL TAKE-OFF AND LANDING CAPABILITIES

- (a) Vertical take-off and landing aircraft may require different operational procedures for towing/pushback, to transfer the aircraft from/to final approach and take-off area to/from the parking stand. Such operational procedures could rely on remotely operated towing and pushback vehicles.
- (b) The GH organisation will apply the operational procedures of the aircraft operator.
- (c) The GH organisation should ensure that its personnel are trained in remote control of the towing or pushback vehicle, while remaining close to the aircraft.

AMC1 GH.OPS.440 Communication and phraseology

REPORTING OCCURRENCES OF DEVIATIONS FROM STANDARD PHRASEOLOGY DURING PUSHBACK AND TOWING OPERATIONS

The GH organisation should include in its internal reporting procedures reporting of cases of deviations from standard phraseology that endangered the aircraft pushback and towing operations and should encourage its personnel to report such occurrences.

GM1 GH.OPS.440 Communication and phraseology

USE OF ENGLISH LANGUAGE

It is recommended to use English as a primary language for the communication between the personnel on the ground and the flight deck during the aircraft pushback and towing operations.

SUBPART 5 – CARGO AND MAIL HANDLING

GM1 GH.OPS.500 Cargo and mail handling — general

CARGO HANDLING ACTIVITIES IN A CARGO WAREHOUSE

- (a) The cargo warehouse in the scope of this Regulation is any cargo handling facility located at the aerodrome premises or adjacent to it (i.e., in its immediate vicinity), which is authorised for acceptance of cargo ready for carriage, storage and final build-up, and final checks before air transport.
- (b) The cargo warehouse activities are more diverse and cover more aspects of the cargo transportation chain than those related to the preparation of cargo to ensure flight safety.

- (c) The activities occurring at the cargo warehouse that are not directly related to points (a)(1) and (2) of GH.OPS.600 are not included in the scope of the GH Regulation.

GM1 GH.OPS.500(d) Cargo and mail handling — general

CARGO HANDLING ACTIVITIES INVOLVING QUALIFIED PERSONNEL OF THE AIRCRAFT OPERATOR

- (a) The aircraft operator may send qualified personnel to ensure that the aircraft and its cargo are handled in accordance with its operational procedures. For example, the aircraft operator personnel may be involved in the following steps of the cargo handling process: aircraft offloading/loading supervision, cargo build-up supervision, etc.
- (b) Whether the cargo handling is executed with or without direct involvement of the personnel of the aircraft operator, it is subject to compliance with this Regulation and the applicable requirements of Regulation (EU) 965/2012.

GM1 GH.OPS.505 Handling of special cargo, other than dangerous goods

SPECIAL CARGO

The following items are considered special cargo:

- (a) Pharmaceutical products,
- (b) Live animals,
- (c) Perishable items,
- (d) Dangerous goods,
- (e) Human remains,
- (f) Any other items that require special handling and/or transport.

SUBPART 6 – GROUND SUPERVISION

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