

Questions and Answers
from EASA’s First Webinar on the Implementation
of the Ground Handling Regulations
17 June 2025

	Main topic	Question	Answer
1	Activities / Scope	Our company provides assistance services on turnaround scale providing potable water, wastewater, external washing of aircraft and waste collection. This regulation is applicable to our activity?	Please see Article 2.2 of Regulation (EU) 2025/20. Potable water services, waste water (aircraft toilet servicing), washing of aircraft (aircraft exterior cleaning) are GH services included in the scope of the GH Regulation.
2	Activities / Scope	PBB is part of Airport infrastructure but operated by Ground Handler. Does the Airport Operator then fall under the scope of the regulation or the Ground Handler regarding PBB or both?	No, the aerodrome operator is not considered a GH organisation as long as the aerodrome staff are NOT operating the PBB (passenger boarding bridge). Please see GM1 ORGH.GSE.100(c) published in the EASA Decision 2025/007/R. PBB is included in the list of GSE (see GM2 Article 2(2) Scope in the same EASA Decision).
3	Activities / Scope	Does regulation apply to into-plane refuelling service?	Yes. See Article 2.2(c)(ii) of Regulation (EU) 2025/20 and point GH.OPS.310 'Aircraft refuelling and defuelling' and the related AMC and GM in EASA Decision 2025/007/R.
4	Activities / Scope	Please rephrase your previous statements that into-plane services (fuelling)/line maintenance are not ground handling. As per EU Dir 96/67, these are specified as one of the GH categories. I do understand it does not fall in the scope of this new regulation (Reg. 2025/20). This to avoid confusion.	Please see Article 2.2(c)(ii) of Regulation (EU) 2025/20 which states: "2. This Regulation shall apply to the following services provided to aeroplanes: (c) the following aircraft servicing activities: (ii) aircraft refuelling and defuelling, namely into-plane fuelling services at the aerodrome". Into-plane fuelling services are in the scope of the GH Regulation. See also point GH.OPS.310 'Aircraft refuelling and defuelling' and the related AMC and GM in EASA Decision 2025/007/R. Please refer only to GH Regulation (EU) 2025/20 if you want to find out which GH services are in the scope. The GH Directive 96/67/EC does not regulate safety of GH services.
5	Activities / Scope	Could EASA clarify whether activities like arrival checks, walkarounds, and headset communication performed by a maintenance organisation after release, and at the operator’s request, fall under the GH Regulation, requiring a GH declaration?	Any ground handling activity when performed by a maintenance organisation approved under Regulation (EU) No 1321/2014, other organisations compliant with Regulation (EU) No 1321/2014, and other maintenance organisations holding an approval issued in compliance with ICAO Annex 8 Chapter 6 for the purpose of aircraft maintenance falls outside the scope of the GH Regulation (EU) 2025/20. That maintenance organisation is not required to declare. This exemption is covered by Article 2.3(g) of the GH Regulation.
6	Activities / Scope	Ref. Art. 2.2 (d)(ii) aircraft turnaround activities: loading and unloading of baggage. In business aviation (CAT/CMPA) loading and unloading of baggage is usually performed by the flight crew. Does it mean that AOC Holder shall declare self-handling?	Self-handling by a CAT operator of a complex motor-powered aeroplane falls in the scope of the GH Regulation (EU) 2025/20. Such an aircraft operator (an AOC holder in this case) is required to declare as self-handling aircraft operator and comply with the requirements of the GH Regulation. Only CAT operators of other-than-complex motor-powered aeroplanes are exempted, as well as non-commercial operators (NCC and NCO) (see Article 2.3(i)).
7	Activities / Scope	If a GH organisation or third party performs 'ground supervision' for an operator, does it remain outside the GH Regulation scope under Art. 2(3)(d), regardless of content, or could it fall within scope?	The ground supervision services performed by a GH organisation remain outside the scope of the GH Regulation (EU) 2025/20. Particularly point ORO.GEN.315(d) in Regulation (EU) 2025/24 (which amends the Air Ops Regulation (EU) 965/2012) applies in this case. See also GM4 Article 2(3) in the EASA Decision 2025/007/R.

8	Activities / Scope	Could EASA give examples of when ground supervision tasks like cargo checks, passing fuel or water figures to crew fall within the GH Regulation scope, and when they remain outside?	Ground supervision services are outside the scope of the GH Regulation (EU) 2025/20. They are included in Regulation (EU) 2025/24, which amends the Air Ops Regulation (EU) 965/2012. This service falls under the responsibility of aircraft operators. Please see GM36 Annex I (Part-DEF) published in the EASA Decision 2025/008/R.
9	Activities / Scope	As ADR we provide: sorting baggage, PBB and handling of VIP pax. PRM handling is performed by an external GHO. Which services are within the scope of new reg?	Please refer to Article 2 of Reg. (EU) 2025/20 and the relevant AMC/GM. The regulation covers only safety aspects related to ground operations. Customer service, on-time performance or quality of services are not in the scope of the regulation. On PRM (passengers with reduced mobility), only the safety aspects are covered by the GH Regulation (e.g., handling of dangerous goods).
10	Activities / Scope	Could you please clarify GH.OPS.105 (a) Control of Passengers on the Apron and the reference on Reg. (EU) 139/2014 - there is nothing about the control of pedestrians on the apron in Reg 139/2014?	Control of pedestrians is in ADR.OPS.B.033 of Regulation (EU) 139/2014. That rule has been amended with Regulation (EU) 2025/21. Point (a1) of ADR.OPS.B.033 requires the aerodrome operator to establish procedures to ensure safety of passengers embarking or disembarking an aircraft or walking to, from or across the apron.
11	Activities / Scope	Marshalling: is this activity not in GHSP hand anymore?	The GH Regulation (EU) 2025/20 does not cover ground handling activities that are already regulated by other aviation safety regulations. Aircraft marshalling is covered by Regulation (EU) No 139/2014. Provision of aircraft marshalling services is considered to be an activity related to the apron management services (see point ADR.OPS.D.001(a)(4) and ADR.OPS.D.030). In the end, it is less relevant which organisation provides the service as long as the applicable requirements are complied with. If the GH service provider (GHSP) also provides aircraft marshalling services, the GHSP must comply with the requirements of Regulation (EU) 139/2014 applicable to this service (see in particular the amending Regulation (EU) 2020/1234 on apron management services). Aircraft marshalling does not need to be declared in accordance with the GH Regulation.
12	Activities / Scope	If the GH operator provides marshalling or aircraft follow-me services, which are functions of apron management, who will be responsible for compliance of those services, aerodrome operator or CAA?	An organisation that provides aircraft marshalling and 'follow-me' services has to comply with the requirements of Regulation (EU) 139/2014 applicable to those services, regardless of whether that organisation is an aerodrome operator, a provider of apron management services or a GH organisation. The GH Regulation does not duplicate requirements already existing in other EU aviation safety regulations. The CAA (civil aviation authority) is not the same with the aerodrome operator. Also, the CAA does not provide GH services or apron management services. Oversight of those activities is the responsibility of the competent authority of the aerodrome where those services are provided.
13	Aerodrome - GHSP arrangements	The role of the Airport Operator vs. declaration, can the Ground Handler start to operate once they have submitted the declaration to the CAA?	A GH organisation can start providing GH services as soon as all the following criteria are met: - it has submitted a declaration to the competent authority; However, before submitting the declaration, the GH organisation has to verify its compliance with the regulation and, if it's not the case, take the necessary actions to be compliant before it submits the declaration; - it has all the necessary arrangements with the aerodrome operator (e.g., security clearance for its personnel who must have access on the airside), and trained its personnel as required by the aerodrome operator under Regulation (EU) 139/2014 applicable to the GH organisation as an aerodrome user. See ORGH.GEN.115. Furthermore, if the provisions of the GH Directive 96/67/EC apply at that aerodrome, then the GH organisation might consider ensuring compliance with that Directive first and then submit its declaration under Regulation (EU) 2025/20. It is suggested to apply the steps in this order considering the preparations that are required by the application of the GH Directive compared to the considerable preparations required to comply with the GH Regulation (EU) 2025/20 (development and implementation of a management system, with all the subsystems, processes, procedures, training, GSE maintenance programme already in place). NB : in case the GHSP is already operating before the date of application of Regulation (EU) 2025/20, it is supposed to be already compliant with GH Directive and to already have necessary arrangements with the aerodromes. Thus, it will only have to declare itself to continue its operations.
14	Aerodrome as GHSP	Is there any plan to give the aerodromes a possibility to perform GH activities without the need to declare them as GH? e.g. bus services?	The exempted activities performed by aerodrome operators, for which they do not need to submit a declaration, are included in Article 2.3 of Regulation (EU) 2025/20.

15	Aerodrome as GHSP	For newly established airports that will provide ground handling services, should the declaration be submitted along with the application for airport certification?	No, the declaration doesn't have to be submitted at the same time as the certification application, as aerodrome certification is a totally different process and does not look at the ground handling services. Prior to commencing the operation of an aerodrome, the aerodrome operator has to obtain the applicable certificate(s) issued by the Competent Authority (see ADR.OPR.B.005 of Regulation (EU) 139/2014). Prior to commencing providing ground handling services, the aerodrome operator only needs to submit a declaration to the competent authority and can start providing GH services immediately after. No prior approval from the competent authority is necessary for the provision of GH services.
16	Aerodrome as GHSP	To what extent can the nominated persons of an aerodrome operator providing ground handling services also assume equivalent roles within the management system of the Ground Handling Service Provider? According to ORGH.MGM.210, this appears to be permitted specifically for the safety manager role. However, the regulation does not explicitly address whether this is also applicable to other key roles such as the post holder for operational services, the training manager, or the compliance monitoring manager.	The requirement of ORGH.MGM.210(i) provides the possibility for one person to be appointed for more than one function if certain conditions are met, but this refers only to the case when that person holds more than one function within the same GH organisation; it does not refer to cross-domain appointment of functions neither does it forbid it. Then, cross-domain functions cumulation is possible, as long as the conditions described in AMC1 ORGH.MGM.210 are fulfilled. (https://www.easa.europa.eu/en/document-library/acceptable-means-of-compliance-and-guidance-materials/amc-gm-part-orgh-issue-1)
17	Aerodrome responsibilities	To what extent will aerodrome operators be held responsible for non-compliance by third-party ground handling providers under the new rules?	Aerodrome operators are responsible for verifying that the GHSP comply with the ADR requirements applicable to them as aerodrome users and with the instructions and procedures included in the aerodrome manual (see Reg. (EU) 2025/20, particularly GH.OPS.005(e), and Regulation (EU) 2018/1139, Annex VII, point 4.1(b)).
18	Aerodrome responsibilities	Will ADR operators be required to continue their present auditing/inspecting ground handlers for compliance with applicable parts of the aerodrome manual and will compliance to the EASA regulation also become part of such audits and inspections?	Aerodrome operators will not have to verify compliance of GH service providers with the GH Regulation (EU) 2025/20; this will be the responsibility of the competent authorities. Aerodrome operators are responsible for verifying that the GHSP comply with the aerodrome requirements applicable to them as aerodrome users and with the instructions and procedures included in the aerodrome manual (see Reg. (EU) 2025/20, particularly GH.OPS.005(e), and Regulation (EU) 2018/1139, Annex VII, point 4.1(b)).
19	Aerodrome responsibilities	Are ADR anyhow involved in oversight of GH activities, along with or in coordination with Authorities? That doesn't rule out that cooperation with the airport authorities is not possible.	The responsibility for oversight on the GH Regulation lies fully with the Competent Authority.
20	Aerodrome responsibilities	I hear some ADR staff say: Now when the GH is going to be regulated, we can become "hands-off" - please make sure to clarify this very well, the responsibilities of ADR operators.	Aerodrome operators are responsible for verifying that the GHSP comply with the ADR requirements applicable to them as aerodrome users and with the instructions and procedures included in the aerodrome manual (see Reg. (EU) 2025/20, particularly GH.OPS.005). They are not responsible to verify compliance of the GH organisations with the GH Regulation.
21	Aircraft operator / ground supervision	As an airline , related to supervision of activities, which activities fall under the new regulation (for example: Station Managers, pax/ramp supervisors)?	The GH Regulation (EU)2025/20 does not regulate ground supervision as a GH service. This is covered by Regulation (EU) 2025/24 amending Regulation (EU) 965/2012: ground supervision is in the full management and control of aircraft operators. On the other hand, the supervisory functions of personnel, including station managers, are regulated by Regulation (EU) 2025/20 mainly under ORGH.MGM.210 'Personnel' but also other requirements in Subpart ORGH.MGM - 'Management system'. If an airline only has supervisory functions but does not perform self-handling, it is not required to submit a declaration as it is not considered a GH organisation in the sense of the definition in Article 3 of Reg. (EU) 2025/20.

22	Aircraft operator / ground supervision	To what extent does supervision by an airline operator go? Ramp Agents e.g. are supervising the operation. Is it still out or in of the scope?	Please see GM36 Annex I Definition published in the EASA Decision 2025/008/R (to Regulation (EU) 965/2012) for a description of the activities covered by the ground supervision function. The ground supervision function should not be confused with the aircraft turnaround coordination function, loading supervision function or any other supervisory function that is regulated by Regulation (EU) 2025/20, point ORGH.GEN.210.
23	Aircraft operator / audits	To which level will it reduce each airline auditing? Compared with DAQCP?	It is expected that the number of audits performed by aircraft operators will be reduced, but it may take a few years to see the effect of this. It will differ for every airline. Also, for de-icing/anti-icing operations, aircraft operators may decide to continue using the DAQCP audits annually in addition to the oversight of that operation by competent authorities.
24	Aircraft operator / audits	As there is no certification, being compliant to the regulation will probably not replace the numerous audits done by air operators, correct?	The fact that there is no certification does not mean there is no verification of compliance of GH organisations. The competent authorities will conduct direct oversight of the GH organisations (Regulation (EU) 2025/23 establishes those requirements). Thanks to this direct oversight, GH organisations will be allowed in the future to present the oversight reports to their aircraft operators to serve as proof of compliance with the GH Regulation, and therefore the aircraft operators will no longer have to audit all the aspects of a GH organisation's management system and operations that are already checked by the competent authority during the oversight. Aircraft operators will be allowed to perform a risk-based monitoring of compliance and focus on that is more relevant for them and do perform audits less frequently. The Air Ops rules (AMC) related to compliance monitoring and contracted activities will specifically allow this.
25	Aircraft operator / audits	We are, as a GHSP, flooded by audits and inspections by the different carriers. Being now under an EASA regulations this will be simplified and made more efficient and less time and efforts consuming?	Yes, this is the intention. As oversight of GH organisations will be the direct responsibility of the competent authorities, GH organisations will be able and allowed in the future to present the oversight reports to their aircraft operators to serve as a proof of compliance with the GH Regulation, and therefore the aircraft operators will no longer have to audit all the aspects that are already checked by the competent authority during the oversight. Aircraft operators will be able to perform a risk-based monitoring of compliance and focus on that is more relevant for them and do perform audits less frequently. The Air Ops rules (AMC) related to compliance monitoring and contracted activities will specifically allow this.
26	Aircraft operator / audits	Will Air Operators have access to the [competent authority] audit reports?	Reports of audits and inspections on ground handling organisations performed by the Competent Authority will only be presented to that organisation and not shared with other organisations. In case the organisation performs ground handling activities in other Member States of the EU, the audit report shall be exchanged with that competent authority only for cooperative oversight purposes. See: ARGH.OVS.330(g) (Cooperative oversight). However, nothing prevents the GH organisation from sharing the audit report with its aircraft operators which are its customers, with the purpose of reducing the number of audits that these conduct on the GH organisation.
27	Aircraft operator / GHSP compliance	How will an aircraft operator be able to verify whether a ground handling organization meets all regulatory requirements? Will there be some form of certification that could serve as an initial selection criterion between organizations that comply with the regulations?	The lists of declared GH organisations in the EASA Member States will be made available on either the EASA website or on the webpages of the national competent authorities of each Member State. The GH organisations will be subject to oversight by competent authorities, which will ensure that the GH organisations meet the safety requirements of the GH Regulation and provide GH services in accordance with the terms of their declaration. The GH organisation is free to share the report of the competent authority oversight with its aircraft operator clients to help reducing the audits from the aircraft operators. This way, the aircraft operator is informed about the safety performance of the GH organisation and its compliance with the GH Regulation.
28	Aircraft operator / GHSP compliance	How the Ground Handling regulation is not contradictory to ORO.GEN.205 and ORO.GEN.200 (a)(6)? On the operator responsibility on Compliance Monitoring? Will Air Ops be adjusted to reflect his interface?	The aircraft operator remains responsible to ensure that its safety management system addresses the risks from all contracted activities that are not certified or authorised in accordance with Part-ORO of Regulation (EU) 965/2012. This includes any organisation providing services to the aircraft operator (e.g., GH, CAMO, Part-145, ATO). As these services can be very diverse, ORO.GEN.205 has to remain generic enough so that it covers any service providers, without having to be amended. However, new AMC to ORO.GEN.205 and amended AMC to ORO.GEN.200(a)(6) acknowledge that GH organisations are now regulated and will be overseen directly by competent authorities. The new AMC enable aircraft operators to audit the GH organisations based on risks or degradation of performance, focusing on GH services that are of more interest to them to ensure aircraft safety. For example, operators can focus on the correct implementation by the GH organisations of the operator's operating procedures, ground supervision (if such services are contracted to GH organisations), passenger acceptance procedures, some specific training requirements, or more frequent checks of

			some safety-critical operations (e.g. yearly de-icing audits, which not all competent authorities will conduct on such frequency) or elements that are not in the scope of the competent authority oversight.
29	Aircraft operator / responsibilities	To what extent will air operators be held responsible for non-compliance by third-party ground handling providers under the new rules?	Aircraft operators are not responsible to verify whether the GH service providers comply with the GH Regulation (EU) 2025/20 - this will be the responsibility of the competent authorities. Also, the aircraft operator cannot be made responsible if the GH service provider does not comply with the GH Regulation. Aircraft operators are responsible for the safety of their aircraft and the safety of the flight. Under the requirements of Regulation (EU) 965/2012 applicable to aircraft operators - mainly on the management system (ORO.GEN.200 which covers SMS and compliance monitoring) and contracted activities (ORO.GEN.205) and related AMC&GM (EASA Decision 2025/008/R), aircraft operators must ensure that the safety risks arising from the provision of services are included in their SMS. Also, regarding compliance monitoring, including verification of their GHSP, aircraft operators can apply a risk-based approach towards declared GH organisations which provide services to their aircraft. They may rely on the audits already conducted to the GHSP by the competent authority and apply complement with audits in areas covered less or less frequently by the competent authority. EASA Decision 2025/008/R related to Reg. (EU) 2025/24 - air operations: https://www.easa.europa.eu/en/document-library/agency-decisions/ed-decision-2025008r
30	Aircraft operator / responsibilities	As a business CAT operator (MOPSC less than 19 seats) not performing self-handling, what are the main changes for us? I understand the regulation on GH doesn't apply, but how AO's and GHP's interact in the light of this new regulation? Any change foreseen for AO's in their OM?	CAT operators (regardless of the complexity of their aeroplanes) that only use GH services of a third party service provider (i.e. no self-handling) have a few new requirements in Commission Implementing Regulation (EU) 2025/24 that they have to be aware of and comply with: new point ORO.GEN.150 regarding sharing of safety-relevant information with the GH service providers resulting from findings and non-compliances; ORO.GEN.315 with new requirements on operational procedures for GH (rule applicable to all operators to which Part-ORO applies); and CAT.POL.MAB.110 concerning the load control process.
31	Aircraft operator / responsibilities	Once a declaration is accepted by the authority, and the ground handling organization is under oversight, is there still a regulatory requirement for operators to perform their own (operator) audits?	Yes, as this is part of the aircraft operator's responsibility for contracted activities under point ORO.GEN.205 of Regulation (EU) 965/2012. However, the rule (see the new AMC to ORO.GEN.205 published in EASA Decision 2025/008/R) enables the reduction of air operator audits to declaring GH organisations, having in view the new responsibilities for oversight by competent authorities of the GH organisations. Aircraft operators may conduct risk-based audits on GH services that are of more interest to them to ensure aircraft safety. For example, to verify the correct implementation of the operational procedures specific to the aircraft types in their fleet, ground supervision (if such services are contracted to GH organisations), passenger acceptance procedures or elements that are not in the scope of the competent authority oversight (aspects that are not safety related such as on-time performance, efficiency of procedures, quality of services, etc.).
32	Applicability date	When will the GH Regulations become applicable?	The regulations will become applicable from 27 March 2028.
33	Competent authority	Is it confirmed that the German "Federal Ministry of Transport" will be the Competent Authority for Germany? On slide 13, you have their logo, hence the question 🤔	The competent authority for ground handling oversight is established through Article 62(4) of Regulation (EU) 2018/1139. It is the national competent authority of the Member State where the aerodromes of GH operation are located. In the case of Germany, as a federal state, we cannot answer this question. We recommend that you address your question to the German Federal Ministry of Transport (BMV).
34	Competent authority	The definition of Competent Authority is still linked to national civil aviation authority or could be linked to Aerodromes or both?	The competent authority for ground handling oversight is established through Article 62(4) of Regulation (EU) 2018/1139. It is the national competent authority of the Member State where the aerodromes of GH operation are located. An aerodrome operator cannot be a competent authority.
35	Competent authority	It appears that some countries have not yet designated a Competent Authority for GH. What guidance or advice do you have on this?	The competent authority for ground handling oversight is established through Article 62(4) of Regulation (EU) 2018/1139. It is the national competent authority of the Member State where the aerodromes of GH operation are located. It is indeed possible that not all competent authorities have already nominated focal points or inspectors for future GH oversight. This will be done in the coming months, and their contacts will be published on the websites of each national competent authority.

36	Competent authority	Will there be any webinar dedicated to what the competent authorities shall do in order to prepare for the oversight?	There will not be a separate webinar for the Competent Authorities. EASA has established a Ground Handling Network of Competent Authority Inspectors, in which all the competent authorities of the EASA States meet regularly and work together since 2022 to prepare for the implementation of the new GH Regulations. However, EASA will address the topic of oversight and Regulation (EU) 2025/23 in the future webinars.
37	Competent authority	Does EASA plan to develop a common platform or digital tools to help monitor compliance with the new ground handling regulations?"	Yes. This will be the same digital platform in which the declarations will be submitted.
38	Competent authority	Where can we find the list of competent authority?	The list of EASA Member States and their competent authorities is available on the EASA webpage. Some of the competent authorities' websites have already created a separate webpage for Ground Handling oversight, with information about the new GH Regulations and a contact point or a functional mailbox for GH-related matters.
39	Declaration	Can we apply with a declaration before the 27.03.2027?	No, it's not possible to declare before 27.03.2027.
40	Declaration	What about the national aviation authority? does the declaration has to be submitted to them? tks	The declarations will have to be submitted ONLY to the national competent authority.
41	Declaration (process/form)	Will ground service providers be certified?	No. The GH organisation will submit a declaration. There will not be a certificate. Please note, however, that some Member States issue a certificate (or an authorisation or approval) for compliance with the Groundhandling Directive 96/67/EC. The EU Regulation (EU) 2025/20, which requires GH organisations to submit a declaration, is not related to the GH Directive.
42	Declaration (process/form)	SATA Air Açores (Airline Operator) functions as both a self-handling provider and a third-party handling service. How does the regulation 2025/20 apply to SATA? Is it necessary for us to maintain a full parallel structure for third-party ground handling activities?	If you perform both self-handling as an aircraft operator and also provide GH services to other aircraft operators (which are not part of the same single air carrier business grouping – please see GM1 Article 3(1c) Definitions about this concept), then you should submit 2 separate declarations. Post-event edit: If the GH organisation has the same management system and applies it in both cases (as self-handling and when providing GH services to third-party aircraft operators, then it may submit only one declaration. However, it is expected that the GH organisation is able to demonstrate to the competent authority that its GH Manual also includes the operational procedures of the third-party aircraft operators to which it provides GH services, and that its personnel are trained in those procedures. Where the safety risk assessment identifies specific risks from the provision of services to third-party aircraft operators, those risks should be mitigated and the evidence of the assessment of those risks and their mitigations should be made available to the competent authority during the oversight.
43	Declaration (process/form)	Must the declaration be submitted "via paper" or is it an online tool.	The declaration is an electronic document which shall be submitted by electronic means. Please contact your Competent Authority, if you have any more questions, as the competent authority should be the first point of contact.
44	Declaration (process/form)	Will the GHSP need to fill in the declaration form if they are already operating today?	Yes. This is specified in Article 5 of Regulation (EU) 2025/20. A ground handling organisation shall submit a duly filled declaration starting from 27 March 2027, as agreed with their competent authority.
45	Declaration (process/form)	Is this declaration a one-time event, does it need to be renewed regularly?	The declaration has to be renewed every time there is a significant change affecting the content of the declaration. See ORGH.DEC.100(b) and the related AMC and GM published in EASA Decision 2025/007/R. Also, the GM to ORGH.GEN.130(b) could help understanding changes that do not require a change to the declaration.
46	Declaration (process/form)	Does declaration need to be presented just and only to Competent Authority or to both Airport Operator and Competent Authority?	The declaration must be submitted via the digital platform that will be developed by EASA for submitting declarations and all the Competent Authorities concerned will be automatically notified. The declaration is not required to be submitted to the aerodrome operator, but it is recommended that the GH organisation contacts the aerodrome operator for any formal arrangements concerning the operation at that aerodrome. Subpart DEC - ORGH.DEC.100 Declaration – general requirements

			"(a) The ground handling organisation shall submit a duly filled declaration, including the annex for each aerodrome where it provides services, to the competent authority as identified in point ORGH.GEN.105."
47	Declaration (process/form)	When will the platform for uploading the declaration be available?	The digital platform that will be developed by EASA for uploading the declarations will be operational as of 27 March 2027, as this is the first day the declaration may be submitted.
48	Declaration (process/form)	If a service provider is present at several airports, where does the responsibility for implementing the new regulation lie? Is it per airport/unit or at the company's headquarters?	The implementation of the GH Regulation has to be ensured at all the stations and in all the EASA States where the GH organisation provides services. The senior management of a GH organisation should initiate the implementation process within the organisation. The coordination process is expected to start from the organisation's Headquarters (which is usually located in the organisation's principal place of business) and cascade down to each individual State and aerodrome/station. However, this may depend on the level of centralisation of management of each GH organisation: the degree of independence varies in size: from regions within a country to full country or to a wider region including several countries. Or there can be a fully centralised system, where all stations are strongly linked to the Headquarters. We recommend that you consult with your Headquarters or the country manager. GM1 ORGH.GEN.105(c) Competent authority states: "(a) For GH organisations providing services in more than one Member State and GH organisations that are part of a single GH organisation business grouping, which have a principal place of business (PPoB) in a territory to which the Treaties apply, the entry point for all the information related to their declarations and GH activities at all EU aerodromes within the scope of Commission Delegated Regulation (EU) 2025/20 is considered to be the competent authority of the Member State where the PPoB is located." ORGH.DEC.100 Declaration "(a) The ground handling organisation shall submit a duly filled declaration, including the annex for each aerodrome where it provides services, to the competent authority as identified in point ORGH.GEN.105."
49	Declaration (process/form)	Should the declaration be submitted with the evidences demonstrating compliance with statements?	No. At the time of submitting a declaration, the GH organisation is not required to submit any other document as evidence. The necessary documents will have to be made available to the competent authority in due time before an inspection or an audit. See ORGH.GEN.145 'Provision of documentation for oversight purposes' and the related GM.
50	Declaration (process/form)	Please clarify your statement on slide n°17: 'Operation can start immediately or continue if you are already an existing GH organisation', knowing airports have specific procedures (f.e. EU selection procedures, authorization procedures) which GHSP must follow and comply to prior to starting ops.	Indeed, this statement concerns only what is permitted under the GH Regulation with the declaration regime. Other arrangements, particularly those with the aerodrome operator, as well as compliance with the GH Directive 96/67/EC where that applies, may have to be considered and solved in advance of submitting a declaration. Please see also ORGH.GEN.115 in Regulation (EU) 2025/20.
51	Declaration (process/form)	So declaration will be different of what is currently a certification for GHSP released by civil aviation authority? Will this be part of it? Will the certification be superseded by declaration and then overseen if compliance exists?	Current certificates for safety and operational requirements issued by competent authorities in some Member States under a national regulation will lose their validity when the GH Regulation (EU) 2025/20 becomes applicable. Those certificates will not be reissued. They will be replaced by declarations submitted by the GH organisations. Please note that the declaration will not replace any certificate/authorisation of compliance with GH Directive 96/67/EC, where applicable, which may need to be considered and resolved before submitting a declaration. A declaration is different from a certificate: with a declaration system, GH organisations can immediately start operating (or continue operating) as soon as they have submitted the declaration to their competent authority; they don't need to wait for the authority approval first (as it is the case with a certification regime).
52	Declaration (process/form)	Is a fee involved for submitting the declaration?	There is no fee involved for submitting declarations in the European Regulation.
53	Declaration (process/form)	Will a template for declaration be provided?	The template for the declaration is the one in Appendix 1 to Subpart ORGH.DEC. EASA is working on a digital version of the declaration template, which should be available in the digital tool where the GH organisations will have to submit their declaration.

54	Declaration / PPoB	For the declaration: how to decide to which authority to submit it, if the organisation has management offices (CEO, COO, CFO) and operates in different countries?	You should determine in which Member State your principal place of business is located, then contact the competent authority designated by that Member State. The criteria to determine your principal place of business are in ORGH.GEN.105 and related GM.
55	Declaration / PPoB	For a large GHSP working in different countries: is submittal of the declaration mandatory on station level, country level or on European level ?	The declaration will have to be submitted in a GH digital platform only once. The digital platform will be operational and accessible on the EASA website as of 27 March 2027. For GH organisations operating at more than 1 aerodrome or in more than 1 Member State, the declaration should consist of the first part of the form completed only once (as those fields, statements and general information should cover all stations) and more annexes, one for each aerodrome of operation separately. The GH digital platform where the declarations will have to be submitted will be designed in such a way as to enable submission (uploading) of the declaration to all the competent authorities in the Member States where the GH organisation provides services - with a single click (by marking the names of those Member States in specific fields). All competent authorities of those States that are marked will be automatically notified of the declaration that is addressed to them.
56	Declaration /PPoB	If an organization operates in different countries, does it have to submit the declaration to each local authority or would be an option to make a declaration at European Level?	The declaration will have to be submitted in a GH digital platform only once. The digital platform will be operational and accessible on the EASA website as of 27 March 2027. For GH organisations operating at more than 1 aerodrome or in more than 1 Member State, the declaration should consist of the first part of the form completed only once (as those fields, statements and general information should cover all stations) and more annexes, one for each aerodrome of operation separately. The GH digital platform where the declarations will have to be submitted will be designed in such a way as to enable submission (uploading) of the declaration to all the competent authorities in the Member States where the GH organisation provides services - with a single click (by marking the names of those Member States in specific fields). All competent authorities of those States that are marked will be automatically notified of the declaration that is addressed to them.
57	General	Will you be publishing an easy access document that combines the rule, GM and AMC? This will make the regulations much easier to review as many of these organisations are new to regulation material.	Yes. EASA will also publish the Easy Access Rules (EAR) later this year.
58	General	One of the main problems of the industry is the manpower, would/should there be some provision for minimum manpower levels for AC type? When in ATC there is a sick controller the airport reduces capacity, when we have sick staff we are expected to operate as if no change	The GH Regulation (EU) 2025/20 does not contain provisions to specify the minimum number of GH personnel required for a particular GH activity. There are, however, more general requirements that the GH organisation shall ensure that sufficient personnel are available for the safe provision of GH services in accordance with the GH Regulation (ORGH.MGM.210(j)). Another requirement (ORGH.MGM.210(a)) states that the accountable manager of the GH organisation is responsible to ensure that sufficient resources are allocated so that all activities can be carried out in accordance with the Regulation. Those resources include personnel. Furthermore, it is intentional that the rules do not provide stringent details on the minimum number of personnel for GH activities, as the quantification of personnel depends on various factors, not only by the aircraft type but also the GSE used, the time available for the turnaround, and other things that are specifically indicated in the GH organisation's SMS. The GH organisation is responsible to decide how to ensure the right level of personnel.
59	General	What was the reasoning not to leave Ground Handling as the responsibility of the Air Operator?	There are several reasons. The explanation is rather complex and cannot be easily addressed in this format. Very briefly mentioned, there was the need to ensure a minimum level of safety for all GH services at EU aerodromes, which could not be achieved by voluntary implementation of industry standards; multiple variations of operational procedures in GH coming from as many aircraft operators, instead of aiming for standard operating procedures to the same aircraft types (which increase the safety risks in the provision of GH services); no direct feedback from a neutral competent authority after occurrence reporting; need to standardise and ensure a minimum level of training of GH personnel; need to ensure a mandatory maintenance programme of GSE. Furthermore, increasing responsibility and complexity of processes for aircraft operators in managing the safety of flight operations; a change in the business model of GH services in the past 50 years – a shift from self-handling by aircraft operators towards setting up of independent GH service providers, which would consequently mean a shift in the allocation of responsibilities for the GH activities from the aircraft operator to the GH service provider. Importantly, this regulation also promotes a level playing field for GH organisations and integrates ground handling into the broader aviation safety framework. A detailed impact assessment which included this topic was performed during the rulemaking phase. We recommend that you consult the EASA GH Roadmap and the associated working papers presented in 2019 at the first EASA GH Conference, as well as the Terms of Reference to RMT.0728, and the EASA Opinion 01/2024 Section 2 for more details.

60	General	Is there a plan for an impartial evaluation to determine whether the new requirements genuinely improve safety?	Yes. EASA Opinion 01/2024 (Section 5) includes a set of actions and data collection to monitor and evaluate the implementation of the GH Regulations against the objectives set in RMT.0728.
61	General	Are the next webinars (September and December) about the same topics of today's or there will be other topics to discuss?	There will be different topics in the next webinars. In 2026, EASA plans to provide a few more webinars, once every quarter. Stay informed by regularly checking the EASA website, particularly the Events page.
62	GH Directive 96/67/EC	What is the difference between the EU GH Regulation and the GH Directive 96/67/EC?	Primary focus: GH Directive 96/67/EC: Market liberalisation. Reg. (EU) 2025/20: Safety and operational requirements Scope: GH Directive 96/67/EC: Access to ground handling market. Reg. (EU) 2025/20: Comprehensive safety and operational requirements. Safety standards: GH Directive 96/67/EC: Not addressed. Reg. (EU) 2025/20: Mandated management system including a Safety Management System Training requirements: GH Directive 96/67/EC: Not specified. Reg. (EU) 2025/20: Mandated training and competence standards Oversight: GH Directive 96/67/EC: Limited to market access. Performed as per national regulations transposing the GH Directive. Reg. (EU) 2025/20: Comprehensive oversight conducted by the civil aviation competent authorities of the aerodromes of operation.
63	GH Directive 96/67/EC	Any concern in not having touched and assess the effects of 96/67/EC during this 3 decades time frame? It looks like 2025/20 does not have any concern about	The GH Directive 96/67/EC is not in EASA's remit. The GH Directive addresses market access. Regulation (EU) 2025/20 - which is in EASA's remit - has a different scope: safety. We recommend that you address your question related to the GH Directive to the European Commission.
64	GH Directive 96/67/EC	Will there be a limit on the number of GHSP that may work at a single airport? Can a CAA limit it with their own regulations?	The GH Regulation (EU) 2025/20 regulates safety of GH services and the organisations providing them. It is not related to market access and its scope is different from that of the GH Directive 96/67/EC.
65	GH Directive 96/67/EC	Actually 96/67 affects the safety by deregulating markets. Now 2025/20 applies rules to safety which is already asphyxiated by 96/97; these rules would not help in mitigate deregulation.	The GH Regulation (EU) 2025/20 regulates safety of GH services and the organisations providing them. It is not related to market access and its scope is different from that of the GH Directive 96/67/EC. The GH Directive 96/67/EC does not regulate safety of the provision of GH services.
66	GSE maintenance	PBB are considered as a GSE in the GH regulation, so shall fall under the scope of the GSE maintenance requirements. But the maintenance of the PBB is in the scope of ADR as ADR equipment. Will this be addressed in AMCs ?	If a GH organisation already applies the maintenance programme established by the aerodrome operator for the PBB (or the GH services are provided by the aerodrome operator itself as a GH organisation), the GH organisation using the PBB does not need to have a separate maintenance programme of its own; it may only refer to the maintenance programme of the aerodrome operator. Point (c) of ORGH.GSE.100 could be helpful in establishing which entity is responsible for the maintenance of the PBB. The requirements on GSE maintenance programme in the Aerodrome Regulation (ADR.OPS.C.005) and the GH Regulation (ORGH.GSE.100 and 105) do not contradict but rather complement each other.
67	Industry standards	EASA and IATA connection on Part GH-OPS - If an Airline/Ground Handler is already IATA IOSA or ISAGO approved, what will they have to do to comply with the Part GH - OPS?	Such organisations should perform a gap analysis and identify the differences in their manuals, processes and procedures against the GH Regulation (EU) 2025/20. It is very likely that IATA is proactively looking into these differences already. Competent authorities may consider that some GH organisations are accredited through industry audit programmes (ISAGO or IS-BAH) when overseeing that organisation. This is already applicable today with other industry audit programmes, in the case of aircraft operators. The same principle is applied to the GH Regulation as well. However, the responsibility of oversight stays with the CA and cannot be delegated to an industry audit programme. For reference, please see ORGH.GEN.125 Use of Industry standards in Regulation (EU) 2025/20 and point ARGH.OVS.310 Industry standards in Regulation (EU) 2025/23.
68	Industry standards	If we are compliant with IATA IGOM and AHM, does that mean we are automatically compliant under the GH regulation? Or does the GH regulation deviate from the IATA material?	No, you're not automatically compliant with the GH Regulation. Organisations should perform a gap analysis between their current documentation, processes, operational procedures, etc. against the content of Regulation (EU) 2025/20. We also recommend that you contact your competent authority in case you have any doubts or want to confirm your level of compliance before the GH Regulations become applicable. For reference, please see ORGH.GEN.125 Use of Industry standards in Regulation (EU) 2025/20 and point ARGH.OVS.310 Industry standards in Regulation (EU) 2025/23.

69	Industry standards	Will there be some help to pass from IS-BAH standards to EASA Standards?	Please contact IBAC for this question. Please note, however, that compliance with the EU GH Regulation is mandatory, whereas application of any industry standard is voluntary.
70	Integrated management system	Is there any discretionality left to National CAA to decide whether Aerodrome Operators acting also as Ground Handlers might keep just one Management system (especially one SMS) for both entities or not?	Refer to ORGH.MGM.200 (d): 'Notwithstanding points (a), (b) and (c), if the ground handling organisation is part of a legal entity that holds one or more additional certificates, approvals, or authorisations or declares its activity in accordance with Regulation (EU) 2018/1139 and its delegated and implementing acts, the ground handling organisation may integrate its management system with the management system that it has already established under the provisions applicable to that certificate, approval, authorisation or declaration, as the case may be.' The aerodrome operator and not the competent authority is the one that decides on an integrated or separate management systems. However, even in an integrated management system, the safety risk assessment, the safety performance indicators, the risk mitigations have to be domain specific. Some other elements can be the same, for example safety promotion (though the content should be adapted per domain), or the tools and processes used in safety risk management; the compliance monitoring processes, etc. Similarly, the change management may have common elements, as well as separate, distinct elements per domain. In conclusion, the organisation will have to assess the benefits but also the risks of maintaining two separate management systems or adopting an integrated management system, with specific elements kept separate and distinct for each domain. For aerodrome operators in particular, the organisation will have to consider the different regimes applicable to each regulated domain, including the oversight and any required approvals: the aerodrome is certified and it implies many approvals by the competent authority, while GH operations are declared and require no approval.
71	Integrated management system	Can you better specify the meaning of last statement in This slide “ Integrated management system is possible ‘? Do you mean as a “hope” or do you mean i.e. that a GHSP part of an airport authority can share and use the Airport SMS system ?	Refer to ORGH.MGM.200 (d): 'Notwithstanding points (a), (b) and (c), if the ground handling organisation is part of a legal entity that holds one or more additional certificates, approvals, or authorisations or declares its activity in accordance with Regulation (EU) 2018/1139 and its delegated and implementing acts, the ground handling organisation may integrate its management system with the management system that it has already established under the provisions applicable to that certificate, approval, authorisation or declaration, as the case may be.' The aerodrome operator can decide on integrated or separate management systems. However, even in an integrated management system, the safety risk assessment, the safety performance indicators, the risk mitigations have to be domain specific. Some other elements can be the same, for example safety promotion (though the content should be adapted per domain), or the tools and processes used in safety risk management; the compliance monitoring processes, etc. Similarly, the change management may have common elements, as well as separate, distinct elements per domain. In conclusion, the organisation will have to assess the benefits but also the risks of maintaining two separate management systems or adopting an integrated management system, with specific elements kept separate and distinct for each domain. For aerodrome operators in particular, the organisation will have to consider the different regimes applicable to each regulated domain, including the oversight and any required approvals: the aerodrome is certified and it implies many approvals by the competent authority, while GH operations are declared and require no approval.
72	National regulations vs EU GH Regulation	What will happen to the currently issued national AHAC certificates for the transport of dangerous goods under the new Ground Handling Regulation? Will they be recognized and matched to the new system, or will we see two parallel certification schemes?	All national regulations that have the same scope as the EU GH Regulations (fully or partially) will no longer apply from the date when the EU GH Regulations become applicable. This will avoid the continuation of a parallel system.
73	National regulations vs EU GH Regulation	Is there an option for national CAA to impose local certification requirements, as a mean of more stringent measure, especially when it comes to dangerous goods handling?	No, not for the GH provided at aerodromes in the scope of Regulation (EU) 2018/1139.

74	operational procedures	In future trials for alternative fuels like LH2, protocols and procedures using new refueling equipment are not yet defined/validated. How can such trials be monitored jointly by airport, GHSP and operators to avoid unjustified deviations, especially when fuel safety zones are not yet established.	The organisation conducting research and/or trials should ensure that they involve the entities concerned (manufacturers, operators, aerodromes, GHSP) from the initial phases of such projects and ensure that the project/research/trials address all the relevant aspects in a standardised manner.
75	operational procedures / clashes	What happens when a procedure provided by the Aircraft Operator is deemed inapplicable by the local Ground Handling operator, following their own risk assessment?	Point GH.OPS.005(c) of Regulation (EU) 2025/20 states: "(c) The GH organisation shall address with the aircraft operator any conflicting differences that may affect the safety of aircraft, its passengers, or the ground handling personnel as soon as they have been identified, and shall determine together with the aircraft operator whether the implementation of the operational procedures of the ground handling organisation are accepted instead."
76	operational procedures / standards	GH staff is kind of set-up to fail when walking from aircraft to aircraft by Air Operators having own version of procedures for the same aircraft type. A freighter handler last year said that they are given 11 ways to cone & chock a B747 freighter. Will this regulation help standardize procedures?	The GH Regulation does not intend to create a parallel set of procedures to those already provided through industry standards and good practices. Also, the GH Regulation cannot establish requirements contrary to the Basic Regulation (EU) 2018/1139, which states (Annex VII point 4.1.(c)) that the GH service provider shall provide the services in accordance with the procedures and instructions of the aircraft operator it serves. So, the standardisation of operational procedures will still have to come from the Industry. The GH Regulation enables, however, aircraft operators and GHSP to decide on the use of a common set of procedures when they are based on industry standards and best practices. To discourage deviations from industry standards, the AMC to the Air Ops Regulation also specifies that the aircraft operator applying industry standards and good practices for the GH services should run a safety risk assessment to prove that the deviations from the industry standards are proven to be safer than the industry standards or good practices that they apply. At the same time, the GH Regulation (EU) 2025/23 establishes rules that enable the assessment of good industry standards in a formal process, which encourages the continued use (on a voluntary basis) of the accepted industry standards by all the EASA States.
77	operational procedures / standards	Does the new Ground Handling Regulation bring any change regarding operational harmonization – for example, allowing handling agents to standardize procedures like aircraft chocking across carriers? Or will such decisions still rest entirely with each airline as before?	The ultimate decision to fully align the GH procedures of the airlines with those of the GH service providers will have to come from airlines. This is because the current basic act (Reg. (EU) 2018/1139, Annex VII point 4.1(c)) states that the GH service provider shall provide the GH services "in accordance with the procedures and instructions of the aircraft operator it serves". Indeed, the rules of Reg. (EU) 2025/20 and (EU) 2025/24 provide several requirements which enable aircraft operators to use the procedures of the GH service providers; however, this decision remains fully with the aircraft operators. The rules also encourage the use of industry standards, but the application of industry standards is a voluntary decision of aircraft operators and GH organisations.
78	operational procedures / standards	As other people underlined , it is a big concern the huge differences in procedures by the various carriers . I.e chocs and cones for same type of aa/cc. regulations will address this lack of standardization and excessive personalization of procedures within the carriers ?	The ultimate decision to fully align the GH procedures of the airlines with those of the GH service providers will have to come from airlines. This is because the current basic act (Reg. (EU) 2018/1139, Annex VII point 4.1(c)) states that the GH service provider shall provide the GH services "in accordance with the procedures and instructions of the aircraft operator it serves". Indeed, the rules of Reg. (EU) 2025/20 and (EU) 2025/24 provide several requirements which enable aircraft operators to use the procedures of the GH service providers; however, this decision remains fully with the aircraft operators. The rules also encourage the use of industry standards, but the application of industry standards is a voluntary decision of aircraft operators and GH organisations.
79	Other	How do you measure the effectiveness, in terms of safety performance, of the new GH-rules?  	The EASA Opinion 01/2024 (section 5) includes some actions and channels to monitor and collect safety relevant data to estimate the effect of the implementation of the GH Regulations after several years of implementation.
80	Other	Are there any projections on how this regulation will lead to a consolidation of big handling companies that is that small ones to be merged into these?	No. This goes beyond the scope of this regulation and EASA.
81	Other	Is there a requirement or restriction for groundhandling personnel regarding maximum physical exertion in the 2025/20 regulation?	No. This area is ruled by other regulations on health and safety at work.
82	Other	When will the AMC material become available?	The AMC and GM were published in the EASA Decisions 2025/006/R and 2025/007/R on 7 July 2025.

83	Oversight (by CA)	External audits only give a small summary of GHSP performance at certain periods (i.e. once/twice per year). Can regulatory inspections be regular and consistent to assist GHSPs in identifying issues more regularly? Regulatory inspections can ensure Top Management focus on areas of improvement.	ARGH.OVS.305 Oversight programme "(c) The competent authority shall apply an oversight planning cycle not exceeding 48 months, starting from the date when the initial declaration is received. The oversight programme and planning shall reflect the safety performance of the ground handling organisation, as well as its risk exposure." Within this cycle, the competent authority shall perform their oversight, including audits and inspections, including unannounced inspections, as appropriate. Competent authorities can plan several inspections or audits during an oversight cycle, in order to cover the full scope of the oversight programme.
84	Oversight (by CA)	As there will only be a "Declaration", how will be the enforcement to ensure GH's are complying?	Through direct oversight by competent authorities. The oversight is regulated and described in Regulation (EU) 2025/23, particularly Subpart ARGH.OVS.
85	Oversight (by CA)	In the case for Germany, if a GHP have operations in more than one state with different Competent Authorities and must submit a declaration in each state, should GHPs expect a different interpretation of the Regulation from each Competent Authority or will the National Level set the standard?	No, this is not expected to happen. The regulations have to be interpreted and applied the same in all States by all competent authorities. In any case, the declarations will be submitted only once into the EASA digital tool that will be developed for this purpose, and all the competent authorities concerned will be immediately notified.
86	Oversight (by CA)	From an aircraft operator point-of-view, how will cooperative oversight by the various competent authorities affect us practically? Will oversight results be made available to us so that they can be fed into our own oversight? Will this eliminate the requirement to conduct our own audits?	Authorities will not automatically share audit results with air operators. This does not happen in any aviation domain. However, GH organisations may find it useful to share the results of competent authority audits and inspections where relevant with their client air operators. Indeed, the ultimate aim is for aircraft operators to rely on the results from the competent authority oversight in order to reduce their audits only to those areas that are not verified in detail by the competent authorities, such as the application of the operational procedures specific to the air operator, or to conduct audits only of those GH services where the competent authorities may not perform yearly audits or inspections (such as de-/anti-icing).
87	Oversight (by CA)	Will competent authorities audits be considered valid for airlines, therefore, avoid multiple audits during the year from airlines?	Yes, the ultimate goal is that airlines will be able to reduce their audits (a risk-based approach) by using the results of competent authority audits on ground handling organisations. Competent Authorities will not share the audit results with any airline. The audit report belongs to the GH organisation that is subject to the audit/inspection. It will be up to the GH organisation to share those audit reports with its airline clients in order to reduce the airline audits.
88	Oversight (by CA)	Do the competent authorities have the appropriate resources available for the added oversight tasks? How will EASA make sure that this will not become a bottle neck?	Competent authorities have already started to prepare for the implementation of Commission Implementing Regulation (EU) 2025/23, which is directly applicable to them and assigns them with the responsibility to conduct oversight of GH services and organisations providing them. Under this regulation, they must ensure they have the necessary resources and competences, a full management system, including a training programme for their inspectors, an oversight programme and plan, instructions and procedures for oversight activities. They must ensure that the whole system is operational at the time when the GH Regulations become applicable. EASA is working constantly with the competent authorities of the Member States, since 2022, in a GH Network of GH Inspectors, providing support, sharing information, documentation, organising regular meetings, common training for GH inspectors, coordinating discussions and common work on an oversight toolbox, so that competent authorities are able to implement an effective oversight and cooperative oversight.
89	Part-IS	Could you elaborate a bit on the contents of Part IS (Info Sec Mgt)? Thx	As there is still enough time for the implementation of the Part-IS requirements (6 years), EASA will focus first on the implementation of the new GH Requirements and will address Part-IS at a later stage, closer to the time of applicability of the Part-IS requirements. Details related to Part-IS implementation in all aviation domains are available on the EASA website (https://www.easa.europa.eu/en/domains/cyber-security).
90	PPoB	Is Switzerland considered as an EASA state ?	Yes.
91	PPoB	We are a large but decentralized GH group with different centers of competence. The financial center, the accountable manager for safety and the center of control are located in different EU countries. Which one prevails to determine where the principal place of business is located?	The criteria to determine your principal place of business are in ORGH.GEN.105 and related GM. However, please keep in mind that the rule requires that all the criteria must be met simultaneously. Also, the rules do not identify a function such as 'accountable manager for safety'. The accountable manager is ultimately accountable for safety, but responsibility for safety can be delegated to another person.

92	PPoB	Our PPoB activities take place in our group HQ in a non-member state, however, we have operations in a member-state aerodrome. Where should we declare?	You should declare to the competent authority of the Member State where you provide services, regardless of where your PPoB is.
93	PPoB	If PPoB is not in an EASA State does that imply an exemption may be warranted	No. If your GH organisation provides any of the services listed in Article 2.2 at aerodromes in any EASA Member State, they you are subject to compliance with the GH Regulation (EU) 2025/20.
94	PPoB	Which authority is applicable when the PPoB is located outside the EU?	See ORGH.GEN.105 'Competent authority' and the related GM. Such a GH organisation has as many competent authorities as the Member States in which it provides services. Please see the answer to the question below.
95	PPoB / Competent Authority	Does Principle Place of Business need to be in an EU state? If not which competent authority will they deal with?	No, it does not need to be in an EU State, but if it were, it would enable the application of cooperative oversight, which would make the oversight process more efficient both for the GH organisation and for the competent authorities involved in the oversight. A pan-European GH organisation will anyway have more than one competent authority - there will be one in each Member State, which is responsible to oversee the GH organisation at the aerodromes in that Member State (see ARGH.GEN.100 in Regulation (EU) 2025/23). The benefit of having the PPoB in an EASA State is that the competent authority conducting oversight of the organisation's management system (at its PPoB) will verify the management system once for all the other competent authorities involved in cooperative oversight, and will share the inspection/audit results with all the other competent authorities concerned, so that they won't have to duplicate the inspection of the same management system in every State. Cooperative oversight may be more difficult to apply to a GH organisation whose PPoB is outside the EU, as the tasks of the various competent authorities in cooperative oversight (described in ARGH.OVS.330 of Regulation(EU) 2025/23) may not be so easy to allocate in the absence of a 'main' competent authority.
96	PPoB	PPoB .. most international ORG have seperate Companies established in a country, so HDQ is PPoB ?	See ORGH.GEN.105 'Competent authority' and the related GM to determine where an organisation's PPoB is located. Indeed, the headquarters of an organisation usually indicates where its PPoB is
97	PPoB / Competent Authority	We provide GH services at several airports within the EU. How to determine which our competent authority is?	If your organisation provides GH services in more than one Member State, you will have more than one competent authority - one for each EASA State where the aerodromes are located (more in the case of Germany). However, to benefit from the efficiency of cooperative oversight (and a reduced number of audits and inspections from all your competent authorities in the Member States where you provide services), you should determine in which Member State your principal place of business is located, then contact the competent authority designated by that Member State. The criteria to determine your principal place of business are in ORGH.GEN.105 and related GM.
98	Proportionality of rules	What if your are an smaller regional airport who does their own GH. The JIG for fuel understands this issue and have a separate JIG for smaller airport why doesn't EASA have a rule set for regional airports. We feel that EASA overlook the smaller airports.	Regulation (EU) 2025/20 is dedicated to ground handling services and providers of those services, regardless of whether they are aerodrome operators, independent ground handling service providers or self-handling aircraft operators. The rules provide several alleviations for small GH organisations, to reduce the administrative burden in implementing the new GH requirements. It is specified directly in those rules that they apply to small GH organisations. At the same time, the regulation states that the organisation shall implement a scalable management system - one that is proportional to the size and complexity of the organisation. So the rules are conceived also for small organisations, but everything is in a single regulation.
99	Scope	Will it be allowed for a GHSP to perform its activity without the declaration?	No, a GHSP will not be allowed to perform any activities covered by the Ground Handling Regulation (EU) 2025/20 without having declared. If, however, a GHSP provides only services that are considered exemptions as listed in Article 2.3 of the same regulation, then a declaration is not required.
100	Scope	Are FBOs for General aviation (business or private) under the scope ?	The term FBO (fixed-based operator) is not defined in the GH Regulation (EU) 2025/20. However, the concept does fall in the scope of the GH Regulation. As a principle, there is no difference in the GH Regulation between GH organisations with regard to the type of operators they provide services to. The GH Regulation covers GH services and organisations providing them at EU aerodromes in the scope of Regulation (EU) 2018/1139.

101	Scope	Will these regulations have in mind Business aviation and FBOs that only deal with Business aviation or is this more focus on Commercial Aviation?	The regulations include in their scope ground handling activities taking place at EU aerodromes in the scope of Regulation (EU) 2018/1139, regardless of the type of flight operation (commercial or non-commercial). The management system with the SMS must be scalable to the size of the organisation providing GH services and the complexity of services it provides. Only with regard to self-handling by aircraft operators does Regulation (EU) 2025/20 provide exemptions (see article 2.3). The regulation also includes some alleviations to decrease the administrative burden for small GHSP. As for the SMS, the requirement specifies that it must be scalable to the size and complexity of the organisation and its operation.
102	Scope	Are ACMI providers in scope?	Not particularly. The acronym ACMI stands for 'aircraft, crew, maintenance, and insurance', there is no ground handling in that. The aircraft will have to be serviced in accordance with the GH Regulation (EU) 2025/20. The aircraft operator (depending on the ACMI agreement, this could be either the contractor or the 'contractee') is responsible (see ORO.GEN.315(b) in Regulation (EU) 2025/24 directly applicable to aircraft operators) to ensure that the provider of GH services has, or has access to, the operational procedures from the aircraft operator, applicable to the aircraft which has to be serviced.
103	Scope	For smaller aviation operators with autohandling at only 1 airport, does it apply to us as well?	The regulation applies to any aircraft operator performing self-handling if that operator is an AOC holder and performs commercial air transport operations (CAT) with complex motor-powered aeroplanes.
104	Training	Will there be any training courses that we can take to prepare for new regulations?	EASA will not provide any training courses, but there will likely be commercial training organisations offering relevant training courses.
105	Training / ADR Reg.	The GH Regulation has different training requirements than 139/2014 OR.D.017 (e.g. frequency, definitions). Will these differences remain, or does EASA plan to align the requirements?	Those differences were long discussed with the Industry during the rulemaking process and the current requirements reflect the result of those discussions and the impact assessments conducted during the rulemaking phase. They will remain as they are now, as the two regulations require training in different areas. Where no period for recurrent training is specified in the GH Regulation, then the recurrent period established through other regulations will apply to the training required by that regulation. Examples are the training elements in the areas required by Regulation (EU) 139/2014; or dangerous goods training established by ICAO Technical Instructions.
106	Training / ADR Reg.	The Reg (EU) 2025/20 requires a training interval of 36 months, whereas Reg (EU) 139/2014 requires a training interval of 24 months. In case of aerodrome operator personnel conducting ground handling activities, which training interval applies?	The two regulations require training in different disciplines, and there should be no duplication in the two regulations on the same training discipline. Where no period for recurrent training is specified in the GH Regulation, then the recurrent period established through other regulations will apply to the training required by that regulation. Examples are the training elements in the disciplines required by Regulation (EU) 139/2014; or dangerous goods training established by ICAO Technical Instructions. The training in the disciplines required under the Aerodrome Regulation (EU) 139/2014 will be conducted at the recurrent intervals specified in the Aerodrome Regulation.
107	Training / Industry standards	Training requirements Airlines refer to are within IATA AHM1110. It looks like some discrepancies are in GH regs: how this gap will be filled? AHM 1110 will be used as guidance as well?	AHM 1110 can be used as guidance. However, GH organisations should perform a gap analysis and identify the elements required by Regulation (EU) 2025/20 that are not covered by AHM 1110 or are different from the industry best practices and should ensure they comply with the EU requirements. The EASA AMC represent acceptable means of compliance which can be implemented to demonstrate compliance with the implementing rules. If an organisation does not want to implement an EASA AMC, it may apply its own alternative means of compliance (AltMoC), but then the organisation has to meet several conditions. See ORGH.GEN.120 and the related AMC and GM published in the EASA Decision 2025/007/R.