Acceptable Means of Compliance and Guidance Material to Annex I (Part-ORGH) to Commission Delegated Regulation (EU) 2025/20

Issue 1

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SUBPART GEN — GENERAL REQUIREMENTS

GM1 ORGH.GEN.105(a) Competent authority

DECLARATION BY GH ORGANISATIONS HAVING THEIR PRINCIPAL PLACE OF BUSINESS OUTSIDE THE TERRITORIES TO WHICH THE TREATIES APPLY

Point ORGH.GEN.105(a)'s scope of application includes GH organisations that provide services in more than one Member State, either as an independent organisation or as part of a single GH organisation business grouping, and whose principal place of business (PPoB) is outside the territories to which the Treaties apply.

Such GH organisations submit a declaration to the competent authority of each Member State where they provide services.

GM1 ORGH.GEN.105(c) Competent authority

GH ORGANISATIONS' PRINCIPAL PLACE OF BUSINESS

(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 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.

(b) The following criteria are used to identify an organisation's PPoB:

(1) All financial operations and decisions affecting an organisation as a whole, including the operational aspects, enabling the organisation not only to receive funds and profits and reward shareholders, but also to fulfil its obligations and make due payments. These obligations and payments range from costs associated with personnel and facilities to those related to compliance with contractual, tax or any other financial obligations; the payment of dividends, salaries, employment benefits and investment decisions. These financial management functions require planning and management of the funds of the organisation, which cannot be artificially dissociated from the operations of that organisation. These functions are therefore essential to running a business and are a strong indicator of where its headquarters is and where its management takes place, and to which system of law it has the closest link.

(2) The principal control of an organisation's operational activities entails managing operational decisions of the organisation on a regular basis. A place from where the

supply of services is monitored and managed is indicative of the organisation's place from which it controls the operations.

(3) The organisation's accountable manager is ultimately accountable for safety. The accountable manager 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 personnel. With the ultimate responsibility for safety and compliance vis-à-vis the competent authority, it is recommended that the accountable manager either reside permanently in the country where the PPoB is or demonstrate to the satisfaction of the competent 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 (persons accountable for operations, safety, compliance monitoring, training, etc.) controlling and coordinating daily operational activities that ultimately lead to meeting the safety objectives of the EU aviation safety *acquis*.

(5) The head office is the place where all decision-making that affects the development of the entire corporate administration and coordination of the necessary actions takes place on a daily or regular basis.

(6) The records regarding the operational and financial decisions affecting the direction, control, planning, coordination and corporate financing 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 PPoB for aircraft operators performing self-handling is determined in accordance with Regulation (EU) No 965/2012.

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

COMPLIANCE WITH APPLICABLE REQUIREMENTS

(a) The GH organisation should conduct regular reviews of the applicable requirements with which it declares compliance, to ensure that its processes, procedures and documentation remain 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 in its management system; and

(2) be able to provide evidence of such reviews and the assessments referred to in point (1).

GM1 ORGH.GEN.115 Start of operation

PREPARATIVE STEPS

(a) The intention of point ORGH.GEN.115 is to set out the right order of these steps, to minimise the efforts required from the GH organisation to start operating at an aerodrome that restricts access in accordance with Council Directive 96/67/EC (the GH Directive).

(b) Examples of formal arrangements with the aerodrome operator may include, subject to the aerodrome's operational context, any of the following topics:

(1) prerequisite compliance with any EU legislative acts regulating aerodrome market access, when they apply to the GH organisation;

(2) operational procedures of the GH organisation that may have an impact on the operation of the aerodrome;

(3) aspects of the access of the GH organisation's employees and/or vehicles to the airside area;

(4) driving in the airside area;

(5) any training required for compliance with the aerodrome requirements or for use of aerodrome facilities.

(c) When a GH organisation intends to provide services at aerodromes where the GH Directive applies, it is recommended that the organisation start preparing for compliance with Commission Delegated Regulation (EU) 2025/20 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.

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 safety risk assessment for the AltMoC used. The result of this safety risk assessment should demonstrate that those AltMoC enable the achievement of a level of safety that is equivalent to that established by the AMC adopted by the Agency.

(b) The GH organisation should ensure that the competent authority receives the safety risk assessment for the AltMoC 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 aerodrome operators concerned if its AltMoC 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 with the organisation affected by those AltMoC and agree with them on any necessary measures to ensure that those AltMoC have no unintended consequence on the activities of the other organisation.

(c) If an AltMoC is applicable only at certain stations, those stations should be mentioned in the relevant AltMoC.

GM1 ORGH.GEN.120 Means of compliance

SUBMISSION OF INFORMATION TO THE COMPETENT AUTHORITY AND SAFETY RISK ASSESSMENT

(a) The GH organisation submits its list of AltMoC to the competent authority, as identified in point ORGH.GEN.105.

(b) It is recommended that the GH organisation conduct the safety risk assessment of the AltMoC used at the head-office level, so that the 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

USE OF INDUSTRY STANDARDS AND GOOD PRACTICES

(a) For the purpose of the Commission Delegated Regulation (EU) 2025/20, industry standards and good practices are documented technical or operational instructions, procedures or specifications applied on a wide scale in the GH industry that establish norms, principles and criteria to standardise various aspects of GH 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 its SMS, documentation system, compliance monitoring function, contracted services and emergency response plan (ERP);

(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 to provide GH services.

(c) The organisation should ensure that the industry standards and good practices that it uses to comply with Commission Delegated Regulation (EU) 2025/20 meet the criteria for safety and quality of AMC2 ORGH.GEN.125.

(d) The GH organisation should document deviations from the applicable industry standards that affect safety of operation. Where deemed relevant, the organisation should conduct a safety risk assessment for those deviations.

Use of industry standards and good practices — internal compliance monitoring checks

(e) When the GH organisation uses industry standards and good practices to comply with Commission Delegated Regulation (EU) 2025/20, the internal compliance monitoring checks should include a random verification of the correct application of those industry standards and good practices.

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

(f) The GH organisation should comply with point ORGH.MGM.205 for contracted services when a third-party industry auditor verifies the organisation's conformity with industry standards and good practices. The GH organisation should also ensure that there is no conflict of interest of the third-party auditors with the audited organisation.

(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 presume compliance with the implementing rules.

AMC2 ORGH.GEN.125 Use of industry standards

OBJECTIVE CRITERIA FOR INDUSTRY STANDARDS

(a) The industry standards used to demonstrate compliance with Commission Delegated Regulation (EU) 2025/20, including those that are subject to the evaluation referred to in point ARGH.OVS.310 of Commission Implementing Regulation (EU) 2025/23, should meet the following criteria as a minimum:

(1) they are developed, maintained and endorsed with the participation of experts from relevant industry stakeholders;

(2) they address the scope of Annex I and/or II to Commission Delegated Regulation (EU) 2025/20, as applicable, with sufficient details to enable implementation of the related implementing rules;

(3) they are based on experience in the field and have proven themselves through testing;

(4) they are supported by scientific and/or technical data and documentation, safety tests and safety impact assessments, as applicable;

(5) they include technical, operational and, if applicable, human factors specifications for their safe implementation;

(6) they clearly identify the responsibilities of the persons involved in their application;

(7) they contain procedures for continuing review and improvement, to include lessons learned from daily operations and consider relevant innovations in the field.

RELEVANT INDUSTRY STAKEHOLDERS

(b) The 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. The aim of their inclusion is to ensure that all stakeholders involved in the development and maintenance of industry standards are also involved in their endorsement.

GM1 ORGH.GEN.125 Use of industry standards

INDUSTRY STANDARDS AND GOOD PRACTICES IN THE SCOPE

(a) Industry standards and good practices refer to several documents developed by industry and used by organisations for the provision of GH services, which may be used to implement the requirements of Commission Delegated Regulation (EU) 2025/20.

(b) Examples of industry standards and good practices adopted by industry are as follows:

(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) IATA Live Animals Regulations (LAR),

(6) IATA Perishable Cargo Regulations (PCR),

(7) IATA ULD Regulations (ULDR),

(8) JIG standards related to fuelling,

(9) SAE standards related to aircraft ground de-icing and anti-icing,

(10) EN standards for GSE (EN 12312-1 to 12312-20 and EN 1915-1 to 1915-4),

(11) IBAC International Standard for Business Aircraft Handlers regarding GH (IS-BAH) for business aviation operations.

GM1 ORGH.GEN.130 Management of changes

ASSESSMENT OF CHANGES

(a) Changes may affect the safety performance of a GH organisation and may result in the inadvertent introduction of new hazards that could expose the organisation to new or increased risks if they are not properly managed.

(b) Examples of major changes affecting operations, organisations and personnel:

(1) provision of new GH services;

(2) new types of equipment, including GSE, or equipment based on new technologies;

(3) new types of aircraft for which GH services will be provided;

(4) new stations or schedules;

(5) new training methods or training providers;

(6) new AltMoC;

(7) new or significantly amended regulations, industry standards, good practices or operational procedures, if these have not already undergone a safety risk assessment;

(8) changes in security arrangements;

(9) changes to organisational structure (change of ownership, mergers);

(10) significant changes in personnel affecting key personnel and/or large numbers of personnel (e.g. high volume of newly hired personnel, high staff turnover, insufficient personnel);

(11) transfer of GH services between service providers or between a GH organisation and an aerodrome operator (e.g. PRM handling, operation of PBBs);

(12) changes in the economic situation of an organisation (e.g. commercial or financial).

(c) Effective management of change starts by identifying the scope of the change (why it is necessary, its range, its objective), the magnitude of the change, its safety criticality and its potential impact on human performance. Then, the GH organisation follows the same steps as for a safety risk assessment (hazard identification, risk assessment, risk mitigation). The assessment should be supported by the following data and information obtained through:

(1) conduct of safety cases, safety risk assessments focused on aviation safety. A safety case is a structured argument, supported by evidence, intended to justify that a system is acceptably safe for a specific application in a specific operating environment;

(2) the involvement of key stakeholders in the change management process as appropriate;

(3) the review of previous safety risk assessments, existing hazards and mitigation measures applied; where present;

(4) transparent communication on the implementation plan and progress against the plan.

(d) The assessment of changes is normally initiated by the team that proposes and/or implements them. However, a change can only be successfully implemented if all the personnel affected by the change participate in the process.

(e) The management of change is effective if it is meaningful to the GH organisation and adjusted to its size and complexity.

(f) It is recommended that the process be reviewed upon closure, to identify gaps and lessons learned for future assessments.

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

CHANGES NOT AFFECTING THE DECLARATION

(a) The intention of point ORGH.GEN.130(b) is to also cover changes that are not directly reflected in the declaration but could influence the discharge of the responsibility for the provision of GH services as declared. Such changes — for example, a change to the organisation's financial structure or human resource procedures, may have an indirect effect on the organisation's

management system, but they do not have to be reported to the competent authority. That is why it is important that they are managed appropriately.

(b) GH organisations are not expected to inform the competent authority every time they change their documentation. For example, changes such as amendments to their GH manuals or procedures they follow, or updates to their training programmes, station representatives or GSE maintenance programmes, do not need to be reported to the competent authority.

(c) A GH organisation only needs to ensure that the competent authority has the latest version of its documentation, including the items mentioned above, in due time before an inspection or audit.

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

SUBMITTING THE GH 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, it is expected to submit only the parts of its manuals that show compliance with Commission Delegated Regulation (EU) 2025/20.

AMC1 ORGH.GEN.150 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.

(b) When a finding is raised at an individual station of a GH organisation providing GH services in more than one Member State (which may or may not be part of a single GH organisation business grouping), the GH organisation may decide how to implement the corrective action—either at the station level, at Member State level or at the management system level, with the aim of addressing the issue at all stations where the same finding has been raised.

(c) In the case of level 2 findings, as referred to in point ARGH.OVS.325 of Commission Implementing Regulation (EU) 2025/23, the GH organisation should submit a root cause analysis and a corrective action plan to the competent authority within a specified period. 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(a)(1) Findings and corrective actions

ROOT CAUSE 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 happened. Establishing the root cause(s) of non-compliance

often requires an overarching view of the events and circumstances that led to it, to identify all possible systemic and contributing factors (regulatory, human, organisational, 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 may not consider important factors that must be addressed to prevent recurrence. An inappropriate or partial causal analysis often leads to defining 'quick fixes' that only address the effects of the non-conformity. A peer review of the results of the causal analysis may increase its reliability and objectivity.

(c) It is expected that the root cause analysis consider organisational structures, processes and their interfaces, procedures, personnel, equipment, facilities and the environment in which the organisation operates to set up effective corrective actions to preventing recurrence. Root cause analysis methods — for example, fishbone diagrams, Pareto charts, the '5 whys' and failure mode and effects analysis — may be used to identify the underlying causes of problems, failures and inefficiencies.

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

COMPETENT AUTHORITY FOR REPORTING IN ACCORDANCE WITH REGULATION (EU) NO 376/2014

The wording 'any other organisation required to be informed by the Member State of occurrence' refers to any organisation that is appointed by a Member State as responsible for the investigation of aviation occurrences in accordance with Regulation (EU) No 376/2014. This organisation can be different from the competent authority of the aerodrome where the occurrence took place.

GM1 ORGH.GEN.160(b)(2) Reporting of safety-related occurrences

REPORTING DANGEROUS GOODS EVENTS

(a) The 'appropriate authority of the Member 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 regulations.

(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 ICAO 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

The GH organisation should ensure that the reporting process ends with clear follow-up actions. The reporting process should include, besides the follow-up actions, at least the following, documented in writing:

(a) the investigation of the occurrence and the conduct of an analysis to identify the root cause;

(b) the results of the investigation;

(c) the conclusions of an investigation into an occurrence;

(d) the actions taken to prevent similar occurrences in the future – when relevant, those actions should be included in the SMS, with a safety risk assessment, mitigation measures and safety performance indicators;

(e) the dissemination and promotion of the actions taken, such as, but not limited to, a change in a procedure or the GH manual, updates to the training programme, providing feedback to the reporter (when this is not anonymous), safety promotion actions and further actions with other stakeholders involved.

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

REPORTABLE EVENTS AND FOLLOW-UP REPORTS

(a) The list of reportable GH events can be found in Annex IV to Commission Implementing Regulation (EU) 2015/1018, 'Occurrences related to aerodromes and ground services', points 1 and 2.

(b) Not all occurrences recorded under a voluntary reporting system are reportable to the competent authority; only those that involve an actual or potential aviation safety risk (Article 5(5) and (6) of Regulation (EU) No 376/2014, covering voluntary reporting) are reportable to the competent authority.

(c) It is recommended that the GH organisation liaise with the competent authority to determine what types of occurrences are considered to involve an actual or potential aviation safety risk.

(d) The GH organisation may need to assess whether that reported occurrence is subject to mandatory or voluntary reporting and consequently apply the relevant notification obligations. Sometimes a report submitted under a voluntary reporting system may have to be reclassified by the GH organisation as a mandatory report and vice versa.

(e) The GH organisation is encouraged to include all available relevant information in the notification of the competent authority. If appropriate, the information should include the indication that no further analysis or follow-up actions will be conducted on that occurrence ('closed on issue') or the assessment of the safety risk of that occurrence and actions taken to mitigate it.

AMC1 ORGH.GEN.165 Safety reporting system

CONTENT, USAGE, CHARACTERISTICS OF THE SAFETY REPORTING SYSTEM

(a) The GH organisation's reporting system should be adequate for the size of the organisation; it should be kept simple and include details on what, how, where and when to report.

(b) The reports should meet the requirements of point ORGH.GEN.160 on occurrence reporting in terms of time, format and information to be reported. The GH organisation should provide the means of and format for reporting when this is not established by the relevant authorities under point ORGH.GEN.160.

(c) The reporting system should:

(1) ensure confidentiality, and enable and encourage non-punitive, free and frank reporting of any potentially safety-related occurrence or risk, including incidents such as errors or near misses, safety issues and identified hazards;

(2) provide acknowledgement to the reporter of the successful submission of the report – for small organisations, verbal acknowledgement may be sufficient.

(d) The reporting system, including internal safety reporting, should clearly express the purpose and objectives. The organisation should do the following.

(1) Contain procedures to implement a just culture.

(2) Identify those reports that require investigation and determine whether the event reported qualifies for reporting under points (b) and (c) of point ORGH.GEN.160. A small GH organisation should seek advice from its competent authority on this matter.

(3) Investigate the causal and contributing factors related to the occurrence, incident, error or near-miss event that was identified, including technical, organisational, managerial and human factors. The aim should be to understand what happened and how it happened and to prevent or reduce the probability and/or consequences of future recurrence. Complex organisations should analyse the collective data showing the trends and frequencies of the contributing factors.

(4) Take the necessary corrective actions based on the results of the investigation, to address the root cause of the event and to disseminate knowledge of relevant incidents and accidents and of actions taken to the employees concerned.

(5) Ensure, where relevant, cooperation with the aircraft operator and the aerodrome operator on occurrence investigations by exchanging relevant information to improve ground and flight safety.

(6) Participate in the investigation conducted by the aerodrome operator or the aircraft operator, as appropriate, where the organisation is directly affected by the event or the proposed mitigation measures.

(7) Ensure that the findings of investigations feed into the relevant recurrent training while maintaining the required confidentiality.

(e) Access to reports submitted should be restricted to personnel responsible for processing, storing and analysing them. A small GH organisation may apply a more flexible approach to this restriction, appropriate to its organisational structure.

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 safety environment, events go unreported due to fear of repercussions (possibly indicating poor or no just culture), lack of awareness, prioritisation of completing tasks over reporting safety issues, lack of training on occurrence reporting, etc.

In a well-functioning safety environment, a just culture within the organisation facilitates the accurate reporting of events by GH personnel when they occur to ensure that the appropriate assessments are carried out.

(a) Key risk areas:

(1) damage done to the aircraft may go unnoticed by the flight crew or not be reported to them, 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) damage-related costs increase.

(c) Mitigation measures:

(1) include the SMS in the training programme for personnel, explaining the value of having a safety culture and a healthy, non-punitive safety reporting system;

(2) apply a just culture and encourage open communication at all levels, top-down and bottom-up, about safety actions, events, occurrences and mitigation, to encourage proper reporting, thus enabling damage assessment and event analysis.

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

SHARING OF SAFETY-RELEVANT INFORMATION WITH INTERFACING ORGANISATIONS

(a) The relevant information to be shared with the aircraft operator or aerodrome operator, or both, to improve safety in GH and the operational procedures for addressing safety interfaces includes information, data, facts and analyses from various sources, such as:

(1) audits and inspections, their findings and associated corrective actions;

(2) safety reports;

(3) accident/incident investigations;

(4) safety studies and reviews from official and verified sources.

(b) Safety-relevant information may also be communicated outside the regulatory framework of occurrence reporting as per point ORGH.GEN.160, which implements the essential requirements of Regulation (EU) 2018/1139 (Section 4.2.2 of Annex VII). For example, aerodrome safety committee meetings could be used to maintain regular communication on safety matters and share good practices, common procedures and safety information relevant to the interface procedures.

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 investigation includes:

(a) GH personnel that are competent in the area or subject of the occurrence;

(b) in the case of a complex GH organisation, a trained investigator or an individual that has received training in investigating occurrences.

GM1 ORGH.GEN.170 Psychoactive substances and medicines

ICAO GUIDANCE AND AERODROME OPERATOR PROCEDURE

(a) Further guidance on this issue may be found in ICAO's *Manual on Prevention of Problematic Use of Substances in the Aviation Workplace* (Doc 9654).

(b) Alternatively, the GH organisation may adopt the aerodrome operator's procedure in this area and refer directly to it in its own documentation.

SUBPART MGM — MANAGEMENT SYSTEM

AMC1 ORGH.MGM.200(a) General requirements for the management system

SMALL GH ORGANISATIONS

(a) An organisation that has up to 25 full-time equivalent (FTE) employees is considered a small GH organisation. It may perform any of the GH activities listed in Article 2 of Commission Delegated Regulation (EU) 2025/20. It should be understood that a small organisation is considered to be non-complex, and also that the complexity refers to its organisational structure, not to the complexity of the operations it performs.

(b) The maximum number of FTEs should be regarded as an annual average, to accommodate any seasonal or occasional fluctuations.

(c) If the GH organisation uses more than 25 FTEs regularly or for periods longer than six consecutive months, it should no longer be considered small and should apply the AMC associated with Regulation (EU) 2025/20 or the parts thereof that are applicable to complex organisations.

GM1 ORGH.MGM.200(a) General requirements for the management system

SCALABILITY AND SUITABILITY OF AN OPERATIONAL AND EFFECTIVE MANAGEMENT SYSTEM

(a) All organisations, regardless of their size, are exposed to risks, some of which are potentially significant. This means that:

(1) all elements of a management system should apply;

(2) the effectiveness of the management system will depend on how appropriately its elements are designed, implemented and operated.

(b) However, an operating management system does not need to be complicated and expensive to be effective. It could be made scalable if it keeps on delivering as expected and provides an effective way to manage all key operational risks.

(c) Scaling a management system (including the SMS) does not mean choosing to apply only some elements of the system and not others. Scalability is about adapting the system to the specific operational context of the organisation.

(d) The following aspects are vital for any organisation to understand the context in which its management system operates, the purpose of the management system and the key risks that it must manage effectively (the list is not exhaustive):

(1) regarding the size of the organisation:

(i) number of employees, number of stations where GH services are provided, facilities, pieces of GSE utilised, internal and external interfaces and organisational structure;

(ii) type and variety of services provided;

(iii) number of aircraft operator customers and volume of serviced flights or passengers (as relevant);

(2) regarding the complexity of the GH activities performed and, consequently, of the risks to be managed:

(i) the GH organisation's hazards log, the safety risk assessment reflected in the safety risk severity and tolerability levels, safety performance indicators, the complexity of mitigation measures and controls put in place to minimise the risks of a particular GH activity;

(ii) the number of personnel compared to the number and complexity of tasks to complete for a particular GH activity or for all GH services provided by a GH organisation;

(iii) the training programme to be completed by the personnel assigned to a particular GH activity;

(iv) the interfaces of a particular GH activity with other GH operations or other actors contributing to its execution;

(v) the communication layers among the individuals and entities involved in the execution of that activity, and the hierarchical levels involved in the communication chain;

(vi) the use of any GSE for the execution of a particular GH activity;

(vii) risks associated with the operating environment (e.g. congested aerodrome, mountainous, climate, geographical location, stations near conflicts zones), safety consequences of low safety performance of services provided, potential downtime, etc.;

(viii) risks associated with the business model (e.g. takeovers, mergers, extent of contracted services, services based on a short turnaround or operations under commercial pressure; GH organisation as part of a single GH organisation business grouping, a stand-alone organisation, or part of an aircraft operator or aerodrome operator);

(ix) AltMoC granted by the competent authority;

(3) regarding other external and internal factors:

(i) societal and public expectations;

(ii) economic and commercial environment, competition, balance between the need to ensure stability of the business and the need for change;

(iii) experience in the business, adequacy and robustness of existing procedures;

(iv) safety culture, open reporting culture, prevention culture and just culture;

(v) state's overall performance.

(e) This multidimensional complexity needs proper weighing. The topics below may be used for this evaluation. More details are provided in the Annexes to EASA's *Management System Assessment Tool*.

(1) The safety policy may be a brief high-level statement of the commitment of management, supported by safety objectives that address significant risks; it would be more detailed in a challenging environment. The regular updating of the safety objectives is necessary where the business/operations are continually evolving (due to changing operational activities, numerous deficiencies, crises, etc.).

(2) It is recommended that the communication of these safety objectives be commensurate with the resources of the organisation.

(3) The reporting policy, just culture policy and safety objectives could be combined with the safety policy for small organisations.

(4) The significance of the areas of greater risk (severity, likelihood), the robustness of the mitigation measures greatly affect the efficiency of the safety barriers;

(5) For organisations with a lower level of risk, the safety risk assessment model that they use may be very simple if the hazards identified are easy to mitigate. In addition, the organisation will strive to classify risks in a consistent manner; expert judgement may be sufficient to measure the efficiency of the safety barriers, especially when the volume of data or safety information does not support the precise evaluation of the likelihood and the severity of the consequences of the hazards.

(6) Focus on risks at interfaces will significantly depend on the criticality of the contracted services and the magnitude of the supply chain. The communication of changes and communication at the interfaces will certainly be more demanding in a large organisation or in an organisation contracting many activities.

(7) The management system documentation, hazard log and records (of safety risk assessments, decisions, actions, ownership and monitoring) should be clear and concise but sufficiently detailed to ensure the adequate management of risks. They should be consistent and complete. However, in a small GH organisation, they should not generate 'red tape'.

(8) Human performance and human resources can be critical for organisations of all sizes, although the related issues may depend on organisations' context and size: small organisations will be more affected by retirement, transfer of knowledge, sickness and a stressful environment, whereas large organisations experiencing major changes or significant growth will face major challenges.

(9) The degree of urgency of reaching a certain level of safety based on deficiencies, feedback from the compliance monitoring system, cultural factors or changes to rapidly manage any immediate/pressing safety issue, may affect the resources required for the timely achievement of the safety objectives.

(f) The implementation of industry standards and good practices directly relevant to a GH organisation's activities will also be considered in the design and functioning of its management system.

(g) It is the responsibility of the GH organisation to determine the suitability and scalability of its management system and to demonstrate to its competent authority that its management system is appropriately designed and suitable to effectively deliver results as expected. An operating management system or SMS does not necessarily need to be complicated, time-consuming and expensive to be effective and demonstrate that the significant risks are under control and that the organisation is safety-data-rich and therefore able to take the right managerial decisions.

(h) The following levels of maturity of a GH organisation's management system and experience in the implementation of an SMS are expected to be achieved and demonstrated gradually in several steps, from 'present' to 'effective'.

(1) Present. This means that the GH organisation is able to provide evidence that the components of its management system are defined and documented within its management system documentation.

(2) Suitable. This means that the components of its management system are appropriate and meaningful for its GH activities, its size and the complexity of the services it provides based on the inherent risk of its activities.

(3) Operating. This means that the GH organisation is able to provide evidence that the components of its management system are in use and that an output is being produced.

(4) Effective. This means that the components of its management system achieve the desired outcome, have a positive effect on safety and strive to ensure continued improvement; the desired effect is achieved when the safety objectives are achieved.

Management systems' levels of maturity may change over time, as they depend on the challenges and changes that a GH organisation faces. As the management system of a GH organisation matures to 'operating' and 'effective', the criteria measuring the management system's 'suitability' level may need to be revised.

(i) Details on the implementation of management systems and their suitability and scalability can be found in EASA's *Management System Assessment Tool*, Annexes 1 and 2.

GM1 ORGH.MGM.200(b)(1) General requirements for the 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 of directors.

(b) Other terms used are 'executive management', 'higher management' and 'management team'.

(c) For the purpose of Commission Delegated Regulation (EU) 2025/20, senior management includes the accountable manager.

(d) The GH organisation may have a reduced senior management structure, where several functions are fulfilled by a single person.

(e) In the English language, the notion of accountability is different from the notion of responsibility. 'Accountability' refers to an obligation that cannot be shared or delegated. 'Responsibility' refers to an obligation that can be delegated and shared; it means that a person is assigned specific duties or tasks to perform.

(f) Senior management is expected to:

(1) continually promote the safety policy to all personnel and demonstrate their commitment to it;

(2) provide the human and financial resources necessary for its implementation;

(3) establish safety objectives and performance standards;

(4) take overall accountability for the organisation's outcomes and results.

AMC1 ORGH.MGM.200(b)(2) General requirements for the management system

SAFETY MANAGEMENT SYSTEM

(a) The GH organisation should implement and maintain an SMS that is commensurate with the safety risks of its organisation and activities performed. The SMS should establish processes and procedures covering:

(1) safety policy and objectives:

(i) management commitment;

(ii) accountabilities and responsibilities, including for the accountable manager;

(iii) appointment of key safety roles and assigned personnel;

(iv) SMS documentation;

(2) safety risk management:

(i) hazard identification;

(ii) safety risk assessment and mitigation actions;

(3) safety assurance:

(i) monitoring and measurement of safety performance;

(ii) management of change;

(iii) continuing improvement of the SMS;

(4) safety promotion:

(i) training;

(ii) safety communication.

(b) The capability of a GH organisation to manage safety should be proportional to the safety risks to be managed, which can be at the service level or at the organisational level.

(c) The mitigation measures put in place should reduce the risks to an acceptable level. The effectiveness of mitigation measures should be monitored, as it may change over time.

(d) The GH organisation should establish and apply monitoring activities, measuring tools and indicators to evaluate the organisation's safety performance. Where the various elements of the GH organisation's management system are included in separate programmes, procedures or manuals, they should be cross-referenced.

AMC2 ORGH.MGM.200(b)(2) General requirements for the management system

SMS FOR SMALL GH ORGANISATIONS

(a) Small GH organisations should develop and implement an 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 ensuring adherence to the safety standards required by Commission Delegated Regulation (EU) 2025/20, improving and maintaining the safety of its activities, complying with the applicable requirements, considering best practices and providing 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) While the SMS framework remains the same as for complex GH organisations, the management system and resources should be scalable, and processes and procedures may be simplified and combined. For example, 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.

(c) The GH organisation should identify a person who fulfils the role of safety manager and is responsible for coordinating the processes and tasks related to safety management. This person may be the accountable manager or a person with an operational role within the organisation, on the condition that they are qualified to perform the safety manager role.

AMC3 ORGH.MGM.200(b)(2) General requirements for the management system

SAFETY MANAGEMENT DOCUMENTATION

(a) A GH organisation should develop safety management documentation as the key instrument for communicating the approach to safety for the entire organisation. The safety management documentation should contain all aspects of safety management detailed in AMC1 ORGH.MGM.200(b)(2), as well as the safety reporting and investigation process and ERP.

(b) The safety management documentation may consist of a manual (safety management manual) or a set of procedures issued as stand-alone documents or included in various manuals. The safety management documents should contain adequate cross-references to one another.

(c) The safety management documentation of small GH organisations should reflect the size of the organisations and the complexity of their activities.

(d) The documentation should be available to all personnel.

GM1 ORGH.MGM.200(b)(2) General requirements for the management system

SAFETY RISK MANAGEMENT

(a) The scalability and suitability of the safety management system are expected to be a function of the inherent safety-risk-related capabilities of the organisation. For example, complex structures are usually exposed to complex risks, which require a robust safety risk management process. Or, for organisations facing a lower level of risk:

(1) the safety risk assessment model may be very simple if the hazards identified are easy to mitigate;

(2) expert judgement may be sufficient to measure the efficiency of safety barriers;

(3) the collection of data, including on occurrences, and consequently the safety information may be very limited;

(4) there may be no need for software or tools to manage the SMS; and

(5) the communication policy may be limited.

(b) The safety risk and safety risk tolerability matrices provided in ICAO Doc 9859, *Safety Management Manual*, may be used to determine the tolerability of the safety risks within the organisation. Nevertheless, the GH organisation may use other models to assess and manage the safety risk.

The ICAO safety risk matrix:

Safety risk		*Severity*				
Probability		*Catastrophic A*	*Hazardous B*	*Major C*	*Minor D*	*Negligible E*
Frequent	5	5A	5B	5C	5D	5E
Occasional	4	4A	4B	4C	4D	4E
Remote	3	3A	3B	3C	3D	3E
Improbable	2	2A	2B	2C	2D	2E
Extremely improbable	1	1A	1B	1C	1D	1E

The ICAO safety risk tolerability matrix:

Safety risk tolerability: *Safety risk index range*	*Safety risk description*	*Recommended action*
5A, 5B, 5C, 4A, 4B, 3A	INTOLERABLE	Take immediate action to mitigate the risk or stop the activity. Perform priority safety risk mitigation to ensure additional or enhanced preventative controls are in place to bring down the safety risk index to tolerable.
5D, 5E, 4C, 4D, 4E, 3B, 3C, 3D, 2A, 2B, 2C, 1A	TOLERABLE	Can be tolerated based on the safety risk mitigation. It may require management decision to accept the risk.
3E, 2D, 2E, 1B, 1C, 1D, 1E	ACCEPTABLE	Acceptable as is. No further safety risk mitigation required.

GM2 ORGH.MGM.200(b)(2) General requirements for the management system

GUIDANCE FOR SMALL GH ORGANISATIONS ON BUILDING A SCALABLE SMS

The GH organisation may use the following guidelines from ICAO Doc 10121, *Manual on Ground Handling*:

> *The principles of good SMS apply to all organisations, 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 organisations 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 organisations working around them.*
>
> *For small organisations, 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 organisations'.

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

AMC1 ORGH.MGM.200(b)(2)(i) General requirements for the management system

SAFETY POLICY

(a) The safety policy is a statement expressing the commitment of management to safety and the implementation of the SMS. It should:

(1) be signed by the accountable manager;

(2) clearly identify safety as the highest organisational priority over commercial, operational, environmental or social pressures;

(3) reflect organisational commitments regarding safety, its proactive and systematic management and the provision of appropriate resources;

(4) be communicated, with visible endorsement, throughout the organisation;

(5) promote safety behaviours, encourage safety reporting with reference to just culture principles, indicate which types of operational behaviours are unacceptable and include the conditions under which disciplinary action would not apply;

(6) emphasise the responsibility of GH personnel to comply with all applicable regulations, applicable standards best practices, instructions and procedures established through its management system documentation;

(7) promote the continuing improvement of the management system and operational safety;

(8) be periodically reviewed to ensure that it remains relevant and appropriate to the organisation.

(b) Senior management should:

(1) continually promote the safety policy to all personnel and demonstrate their commitment to it;

(2) establish safety objectives and performance standards.

AMC1 ORGH.MGM.200(b)(2)(ii) General requirements for the management system

KEY PROCESSES IN SAFETY MANAGEMENT

(a) Hazard identification processes

(1) The GH organisation should implement an SMS that enables the adoption of reactive, proactive and predictive methods. A reporting scheme that is based on a combination of reactive, proactive and predictive methods of safety data collection should be the formal means of collecting, recording, analysing, acting on and generating feedback about hazards and associated risks that may affect the safety of GH services.

(2) Hazards identified should include:

(i) hazards that may be generated by human factors; and

(ii) hazards that may stem from the organisational set-up or the existence of complex operational arrangements (e.g. when an organisation (aircraft operator) both performs self-handling and contracts GH services to a third-party GH organisation, when a self-handling aircraft operator provides GH services to other aircraft operators within a single air carrier business grouping or when other services or products are contracted in multiple layers).

(b) Risk management processes

(1) The GH organisation should implement and maintain a formal safety risk management process, to include:

(i) analysis of risks (e.g. in terms of likelihood and severity of the consequences of hazards and occurrences);

(ii) risk classification (in terms of tolerability); and

(iii) control (in terms of mitigation) of risks to an acceptable level.

(2) The levels of management personnel who have the authority to make decisions regarding the tolerability of safety risks, in accordance with point (b)(1)(ii), should be specified.

(3) A risk register, hazard log or equivalent system should be used.

(c) Management of change. See the AMC and GM to point ORGH.GEN.130.

(d) Continuing improvement. The GH organisation should seek to continuously improve its safety performance and the effectiveness of its management system. There should be a focus on updating the risk register, ensuring the continued relevance of the safety performance indicators and the effectiveness of mitigation measures in managing the safety risks identified, and monitoring the competence of personnel and their understanding of their own role in maintaining safety of GH operations.

(e) Immediate safety action and coordination with the aerodrome operator's and aircraft operator's ERPs.

AMC2 ORGH.MGM.200(b)(2)(ii) General requirements for the management system

EMERGENCY RESPONSE PLAN

(a) As part of its SMS, the GH organisation should develop and implement an ERP that ensures prompt, appropriate and effective responses to emergencies. It should be adjusted to the size and complexity of the organisation.

(b) The ERP should cover the corporate and station levels. At the station level, the GH organisation should follow the ERP of the aerodrome operator and support or replace the aircraft operator.

(c) The ERP should:

(1) be coordinated with the aircraft operator's ERP and with the ERP of the aerodrome operator and any other relevant stakeholder;

(2) provide the actions to be taken by the personnel of the GH organisation or specific individuals in an emergency;

(3) include clear instructions on who to contact at the aircraft operator to which the organisation provides GH services at the aerodrome(s) relevant to the emergency and how to contact them (including outside normal business hours) in accordance with the instructions received from the operator.

(d) The GH organisation should ensure that its personnel are aware of their role in an emergency response and are trained adequately to provide the expected support.

(e) The ERP should be tested regularly to ensure that it remains relevant and personnel's training remains current.

GM1 ORGH.MGM.200(b)(2)(ii) General requirements for the management system

SAFETY MANAGEMENT — RISK REGISTER FOR SMALL GH ORGANISATIONS

(a) It is recommended that the risk register cover at least the following aspects:

(1) individual steps in the operational procedures applied in the provision of 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 and weather;

(7) if applicable, the serviceability of any GSE used.

(b) The results of the assessment of the potential adverse consequences or outcomes of each hazard may be recorded in a risk register, an example of which is provided below.

Hazard identification		Safety risks*	Severity/likelihood pre-mitigation		Existing controls**	Risk evaluation: severity/likelihood post-mitigation		Assess residual risk		Who does what in applying the mitigation measures?
No	Description		Severity	Likelihood		Severity	Likelihood	Severity	Likelihood	

* That is, how those hazards could lead to an incident or accident.

** That is, how the safety risk is mitigated.

GM2 ORGH.MGM.200(b)(2)(ii) General requirements for the management system

EMERGENCY RESPONSE PLAN

(a) It is recommended that the ERP cover any type of emergency in which the GH organisation may be involved.

(b) An emergency response may be required even when the aircraft operator does not disseminate its ERP to the GH organisation. However, the GH organisation should consider whether it is liable for emergencies that are exclusively related to the safety of its own services and how it should respond to them as part of its business continuity plan.

(c) The ERP at the corporate level:

(1) sets out how the procedures of the GH organisation are coordinated with the ERP of the aerodrome operator(s) and other entities that will respond during emergency situations;

(2) defines the roles and responsibilities of the GH organisation; and

(3) describes the procedures for notifying and/or communicating with the aircraft operator(s), the aerodrome operator(s) and other relevant entities.

(d) At the station level, it is recommended that the GH organisation be responsible for the following actions:

(1) apply the aerodrome ERP, as well as the aircraft operator's station ERP;

(2) define and document the roles and responsibilities of the organisation at stations;

(3) establish a timeline of actions to be taken in response to emergency events;

(4) ensure that the station personnel are properly trained in relation to the organisation's ERP;

(5) participate as required in any emergency exercises and training run by the aircraft operator and/or aerodrome operator;

(6) review the own station ERP to ensure its relevance.

(e) A small GH organisation may scale the ERP to its size. If it operates at more than one station, the corporate and station-level plans can be combined.

(f) The obligation to follow the aircraft operator's ERP, as per its service contract, remains applicable at all times.

GM3 ORGH.MGM.200(b)(2)(ii) General requirements for the management system

HUMAN FACTORS AND SAFETY HAZARDS

(a) Human factors can be addressed as part of a GH organisation's SMS to optimise human performance within the system. This can be achieved by analysing tasks, the individuals involved and the organisation, and how each of these can affect safety behaviour.

(b) A task or job should be designed with ergonomic principles in mind, taking into account typical human performance limitations to ensure that workers are not overloaded and are able to carry out their tasks in all operational circumstances. The physical design of the workplace, the work environment and equipment, and the mental abilities of the person making 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 a considerable influence on individual and group behaviour. A positive culture promotes employee involvement and commitment at all levels and highlights where deviations from safe working practices are not acceptable.

(e) The GH 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 errors have been identified by industry as being responsible for over 90 % 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, communication failure, distraction and work pressure. As part of its SMS, it is recommended that the GH organisation identify and target root causes related to human factors and take appropriate mitigating actions.

(g) There is a considerable amount of research and academic material on the subject of human factors. One commonly used concept is the 'dirty dozen'. This term refers to 12 of the most common conditions for human error that can act as precursors to accidents or incidents. These 12 elements lead people to make mistakes. Since the introduction of this concept in aircraft maintenance in 1993, the dirty dozen has been a useful starting point in all areas of the aviation industry for discussions of human error within businesses, organisations and workplaces.

(h) While the dirty dozen have increased awareness of how humans can contribute to accidents and incidents, the aim of the concept is to focus attention and resources on reducing and containing human error. There are examples of typical countermeasures designed to reduce the possibility of any human error causing a problem related to each of the 12 elements. There are over 300 elements in the *Human Factors Training Manual* (ICAO Doc 9683), out of which the dirty dozen is listed below.

(i) It is recommended that the GH organisation conduct an analysis of the human factors in their operations and organisation. Using the dirty dozen is an efficient and simple way to conduct this analysis. The 12 elements are shown in the figure below (see also Appendix G to ICAO Doc 10121, *Manual on Ground Handling*).

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 ('the way we do things around here')

(j) The GH organisation should be aware of the issues when employing temporary, including from a third party, and seasonal personnel. Some examples are:

(1) maintenance of competency through training;

(2) inexperienced personnel working unsupervised; and

(3) infrequent use of equipment and procedures.

(k) It is recommended that the GH organisation maintain an appropriate balance between temporary workers and full-time employees within its operational teams to ensure sufficient levels of experience and competency.

AMC1 ORGH.MGM.200(b)(2)(iii) General requirements for the management system

MONITORING SAFETY PERFORMANCE

(a) The GH organisation should conduct an annual review of its safety performance, to assess whether it carries out the declared tasks and responsibilities safely and effectively, as established through its safety policy and safety objectives.

(b) The safety review should be based on relevant data and information, risk registers and potential risks identified through safety audits, reviews and/or surveys, and it should be appropriate for the size and complexity of the organisation. For large, complex organisations, it should include safety trends.

GM1 ORGH.MGM.200(b)(2)(iii) General requirements for the management system

SAFETY PERFORMANCE INDICATORS

The GH organisation may use the following safety performance indicators:

(a) safety reports, including the number of mandatory and voluntary safety reports generated/received by the organisation; the GH activities, processes or procedures being reported on; and the number of occurrences resulting in aircraft damage, vehicles or other property or injuries to persons, and the severity of the damage or injuries;

(b) safety reviews, including trend reviews conducted when introducing new GSE, products (e.g. training) or technologies, when implementing new or updated procedures, or in response to organisational changes that may have an impact on safety or changes to the safety policy, safety objectives, safety performance indicators, safety risk levels;

(c) safety audits focusing on the integrity of the organisation's management system, on the effectiveness of its safety culture and on periodically assessing the relevance of the safety performance indicators and the effectiveness of actions to mitigate safety risks;

(d) safety surveys examining particular elements or procedures at a specific aerodrome generated by a particular operational context or bottlenecks in daily operations;

(e) staff surveys (including cultural surveys), which can provide useful feedback on how engaged personnel are with the SMS;

(f) changes to the usual volume of GH activities performed over the year, number of new or closed stations, or number of new GH services added to the organisation's portfolio or to operating stations;

(g) availability of sufficient resources for the safe performance of the declared GH services;

(h) lessons learned.

GM2 ORGH.MGM.200(b)(2)(iii) General requirements for the management system

MONITORING SAFETY PERFORMANCE BY SMALL GH ORGANISATIONS

A complete assessment of safety performance and safety risks contains information on the following aspects:

(a) changes to safety targets (safety performance indicators) and measures taken to mitigate the identified safety risks, as documented in the safety risk register;

(b) number of occurrences resulting in damage to aircraft, vehicles or other property or injuries to persons, and the severity of damage or injuries;

(c) evaluation of adequacy and effectiveness of follow-up and corrective actions taken in response to non-compliance that have been detected as part of the compliance monitoring function;

(d) safety risks arising from changes such as:

(1) an increase or decrease in the volume of GH activities performed over the year that requires an increase in the number of employees (including seasonal employees);

(2) provision of new GH services or extension of provision of GH services to other stations;

(3) availability of sufficient resources for the safe performance of the services declared.

GM3 ORGH.MGM.200(b)(2)(iii) General requirements for the management system

SAFETY ASSURANCE

(a) As part of the safety assurance actions, the GH organisation may set up a joint safety committee composed of the organisation's management and representatives of personnel from the operational areas.

(b) It is recommended that the joint safety committee meet at least quarterly to review safety reports, training needs and outcomes, and operational risk assessments, and to monitor the implementation of safety-related training and procedural changes.

AMC1 ORGH.MGM.200(b)(2)(iv) General requirements for the management system

TRAINING AND COMMUNICATION ON SAFETY AND SAFETY CULTURE

The GH organisation should ensure that the processes developed under its SMS increase or maintain safety in the provision of GH services and aim to foster a safety culture within the organisation.

(a) Training

(1) All operational personnel should receive safety training that is relevant to their safety responsibilities.

(2) Adequate records should be kept of all safety training provided.

(b) Communication

(1) The GH organisation should establish communication about safety matters that:

(i) ensures that all personnel are aware of the safety management activities relevant to their safety responsibilities;

(ii) conveys safety-critical information, especially relating to risks assessed and hazards analysed;

(iii) explains why particular actions are taken; and

(iv) explains why safety procedures are introduced or changed.

(2) Regular meetings with personnel, where information, actions and procedures are discussed, may be held to communicate safety matters.

(c) Training and communication processes should be assessed and reviewed at relevant intervals to ensure their effectiveness (including understanding by personnel of their individual responsibility in maintaining safety).

GM1 ORGH.MGM.200(b)(2)(iv) General requirements for the management system

SAFETY PROMOTION

(a) Safety training, combined with safety communication and information sharing, forms part of safety promotion.

(b) Safety promotion activities support:

(1) the organisation's policies, encouraging a positive safety culture, creating an environment that is conducive to the achievement of the organisation's safety objectives;

(2) organisational learning;

(3) the implementation of an effective safety reporting scheme and the development of a just culture.

(c) Depending on the particular safety issue, safety promotion may also constitute or complement actions to mitigate risk.

GM2 ORGH.MGM.200(b)(2)(iv) General requirements for the management system

BUILDING AND MAINTAINING A SAFETY CULTURE

It is recommended that the GH organisation consider the aspects and examples below to foster a safety culture within its organisation:

(a) SMS training

(1) Safety and safety culture training for all levels of management to ensure that personnel are aware of the following:

(i) All safety management practices and procedures applicable to their role.

(ii) Their individual responsibility in maintaining safety in their daily tasks. This can be achieved by highlighting aspects of safety when delivering training to develop personnel's technical competence. The training should include explanations of why particular safety-related actions are taken and why safety procedures are introduced or changed. The competence of personnel is proven when they are able

to draw conclusions from safety information systems and willing to implement safety-related changes.

(iii) How various human, technical and organisational factors affect the safety of the whole system.

(2) Training on the analysis of safety data and investigation of occurrences for the personnel participating in such activities.

(3) Training and communication to encourage personnel to identify hazards and suggest solutions. Use open-ended questions to encourage discussion instead of questions that require only a 'yes' or 'no' answer.

(b) Communication on safety — open, consistent and transparent communication and information-sharing among GH personnel regarding safety aspects, horizontally (among personnel) and vertically (from management to front-line personnel and vice versa).

(1) Organise communication sessions to help the GH personnel understand the main concepts of safety culture 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 a 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.

(2) Organise formal and informal discussions about safety culture concepts, such as 'error', 'mistake', 'intentional', 'non-intentional', 'negligence', 'wilful misconduct' and 'gross negligence', and examples of 'crossing the line between error and negligence'.

(3) Ensure the timely and effective dissemination of safety notices and safety information to all personnel.

(4) Include any feedback from past briefings and report on follow-up action taken.

(5) Apply positive reinforcement (praise/thanks for appropriate behaviour).

(6) Share feedback on disseminated results of reported events on a regular basis, in both formal and informal discussions/meetings.

(7) Schedule short debriefings regularly with whole teams about how activities went – aspects that were noticeable, different, not in line with operational procedures, positive or negative – and whether something should be changed. It is important to understand why people do things the way they do.

(8) Listen to the concerns of personnel, without being defensive. The purpose of a briefing is to encourage personnel to start thinking about safety problems. Practical examples can be used in the discussion.

(9) Review the lessons learned from the organisation's own occurrence reports and safety surveys on a regular basis.

(10) Arrange a 'display wall' in the briefing room, to pose questions to personnel — for example, asking them for their opinion about changing an operational procedure — or to inform them about changes stemming from the industry standards that they apply, the regulator or ICAO.

(11) Arrange competitions and games that aim to increase awareness of safety or improve the safety of day-to-day activities.

(12) Personalise safety outcomes (including health and safety).

(13) Participate in safety-related communication campaigns organised by the aerodrome operator or aircraft operator at the aerodrome where the organisation provides GH services.

(c) Safety reporting

(1) Personnel are encouraged to report essential safety-related information. However, a clear line is drawn between acceptable and unacceptable behaviour. This helps in building accountability.

(2) Safety reporting is facilitated using forms that are easy to find, easy to fill in and easy to submit, and that ensure full anonymity. Consider the difficulty of reporting after/during a night shift or a difficult shift (involving congested traffic, severe weather conditions, etc.). In unusual or emergency situations, personnel can report directly to decision-makers to allow a timely response. This aids the flexibility and effectiveness of reporting.

(3) The outcome of internal safety investigations should ensure that the GH organisation disseminates the lessons learned and applies non-punitive measures to improve the safety culture within the organisation and avoid the occurrence of similar incidents.

(d) Human resource management

(1) Ensure management's full involvement in and support for these activities;

(2) Allocate sufficient resources to analysing safety events, to identifying the root causes and providing feedback to reporters and to creating a hazard register based on which safety performance indicators can be established to measure the achievement of safety objectives.

(3) Ask front-line personnel to provide input or feedback when developing or improving procedures.

(4) Involve, as necessary, front-line GH personnel to clarify technical or procedural aspects in the investigation of occurrences and further dissemination of the outcomes and lessons learned from an event.

GM3 ORGH.MGM.200(b)(2)(iv) General requirements for the management system

GOOD PRACTICES IN BUILDING A SAFETY CULTURE

The following are examples of good practices to help an organisation build and maintain a safety culture:

(a) Provide opportunities for management, operational personnel and personnel representatives to discuss operational risks and promote a positive safety culture.

(b) Ensure that senior management are aware of the top operational risks (‘hotspots’) and key safety objectives.

(c) Involve front-line personnel executing daily operational tasks in safety activities, including hazard identification, procedure development and safety risk assessment and mitigation measures, to provide the operational background and context and ensure a just culture within the organisation.

(d) Involve senior management in activities promoting safety culture. One of the core messages of safety culture that should be relayed to GH organisations’ personnel 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.

(e) Develop a plan to address gaps and deficiencies identified during the safety culture assessment.

(f) Communicate the general results of the assessments of personnel’s safety culture and action plans throughout the organisation.

(g) Empower GH personnel to address any safety concerns regarding unsafe operations using a non-punitive reporting system.

(h) Always provide personal protective equipment to GH operational personnel and encourage them to use all appropriate equipment.

(i) Personnel do not feel pressure to come into work when unfit to do so.

(j) Develop standard operating procedures together with the GH personnel and relevant stakeholders.

(k) Enable and encourage GH personnel to submit suggestions for improving processes and procedures to enhance safety.

(l) Implement a safety stack model at aerodromes, where this is feasible. However, this initiative remains at the discretion of the aerodrome operator.

GM4 ORGH.MGM.200(b)(2)(iv) General requirements for the management system

SAFETY CULTURE AND JUST CULTURE

(a) Safety is not the responsibility of a single person or a limited group of people in an organisation. A safety culture should be developed throughout the organisation, involving all personnel as active contributors to the safety of the final product or service.

(b) Just culture, as a component of safety culture, operates with complex concepts. Therefore, it is important to consider human factors in the way in which training is provided to GH personnel, to ensure its effectiveness. For example, complex concepts should be explained in simple terms and using concrete and relevant examples from daily operation.

(c) It is good practice for the GH organisation to develop a just culture policy (ideally a stand-alone document) that is formally endorsed by top management and staff representatives.

(d) 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 Netherlands Aerospace Centre's study Aircraft Ground Handling and Human Factors[2]):

Characteristic	**Indicators**
Commitment *Reflects the extent to which every level of the organisation has a positive attitude towards safety and recognises its importance.*	— Management concern — Personal concern — Investment in safety
Justness *Reflects the extent to which safe behaviour and reporting of safety issues are encouraged or even rewarded and unsafe behaviour is discouraged.*	— Evaluation of (un)safe behaviour — Perception of evaluation — Passing of responsibility
Information *Reflects the extent to which safety-related information is distributed to the right people in the organisation.*	— Safety training — Communication of safety-related information — Safety reporting system — Willingness to report — Consequences of safety reports

[2] Balk, A. D. and Bossenbroek, J. W., *Aircraft Ground Handling and Human Factors*, NLR-CR-2010-125, Netherlands Aerospace Centre: Air Transport Safety Institute, Amsterdam, 2010, https://www.easa.europa.eu/sites/default/files/dfu/Aircraft-Ground-Handling-and-Human-Factors-NLR-final-report.pdf.

Awareness *Reflects the extent to which employees and management are aware of the risks the organisation's operations pose to themselves and to others.*	— Awareness of job-induced risks — Attitudes towards unknown hazards — Attention to safety
Adaptability *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.*	— Actions after safety occurrences — Proactiveness to prevent safety occurrences — Employee input
Behaviour *Reflects the extent to which every level of the organisation behaves to maintain and improve the level of safety.*	— Job satisfaction — Working situation — Employee behaviour with respect to safety — Mutual expectations and encouragement

GM1 ORGH.MGM.200(b)(4) General requirements for the management system

CONSIDERATION OF FATIGUE IN PLANNING GH ACTIVITIES

(a) The GH organisation is already subject to compliance with the provisions of Directive 2003/88/EC of the European Parliament and of the Council of 4 November 2003 concerning certain aspects of the organisation of working time. This is considered the most relevant document enabling the GH organisation to manage fatigue among its GH operational personnel.

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

(c) Fatigue may be induced by:

(1) the environment and conditions in which work is carried out (e.g. noise, rain, high or low temperature), working in enclosed spaces, lifting/moving heavy items or working in uncomfortable positions (e.g. in a bent position or on knees);

(2) excessive hours of duty and shift working, particularly with changing shift periods or patterns, work intensification due to, for example, flight delays or short turnaround times, personnel shortage, additional overtime or night work.

(d) The way and the extent to which the GH organisation should consider the threat of fatigue in the planning of GH tasks and organisation 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).

(e) Fatigue is one example of a human factor that should be considered by the management system, particularly in the planning of activities. In this respect, where the personnel involved in an activity are prone to experiencing fatigue, it is recommended that the GH organisation:

(1) ensure that the safety reporting system required by point ORGH.GEN.165 enables the collection of data on fatigue issues;

(2) ensure that the threat of fatigue is adequately considered by the management system's key processes (e.g. assessment, management, monitoring);

(3) provide safety-related promotional material and adapt safety training accordingly.

(f) When organising shifts, the GH organisation should consider good practices in the GH domain and applicable rules. Below are a few examples of how the GH organisation can set up activities and shifts in a way that enables GH personnel to remain sufficiently free from fatigue to perform the planned activities safely:

(1) include regular breaks in the working schedule, adjusted to the type of activity;

(2) provide rest periods of sufficient time to enable workers to overcome the effects of the previous shift and to be rested by the start of the following shift;

(3) avoid shift patterns that cause a serious disruption of an established sleep/work pattern, such as alternating day/night duties;

(4) inform the personnel of the shift schedule and changes to it sufficiently in advance to enable them to plan adequate rest;

(5) plan recurrent extended rest periods and notify the personnel of these sufficiently in advance.

(g) It is recommended that the GH organisation have a procedure, including mitigation measures, to address cases where working hours are going to be significantly increased or where shift patterns will be significantly modified, such as for urgent operational reasons. In cases not covered by that procedure, the organisation is expected to perform a specific risk assessment and define additional mitigation actions, as applicable. Basic mitigation measures may include:

(1) provision of additional supervision;

(2) use of additional rest breaks.

AMC1 ORGH.MGM.200(b)(6) General requirements for the management system

COMPLIANCE MONITORING — INTERNAL AUDITS

(a) Compliance monitoring process

(1) The implementation of a compliance monitoring process should enable a GH organisation to monitor its compliance with the requirements of Annexes I and II to Commission Delegated Regulation (EU) 2025/20, as well as with any other applicable regulatory

requirements and instructions and with 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 and maintained and continually reviewed and improved, as necessary.

(3) Compliance monitoring should include a method of providing feedback on the findings to the accountable manager to ensure the effective implementation of corrective actions, as necessary.

(4) The GH organisation should monitor the consistent application of its operational procedures and their compliance with the applicable procedures of the aircraft operators to which it provides services and the aerodrome operator of the aerodromes where it operates. In doing so, the organisation will ensure that its activities are performed safely. The GH organisation should, as a minimum and where appropriate, monitor the compliance of the following elements with the applicable requirements:

(i) the declaration;

(ii) the SMS;

(iii) the training programmes;

(iv) the documents and records system, including the GH manual;

(v) the procedures for local operation contained in the aerodrome manual that are applicable to the GH organisation;

(vi) the GSE maintenance programme;

(vii) the GH activities of the organisation carried out under the supervision of the person(s) nominated in accordance with point ORGH.MGM.210(b)(3);

(viii) any activities outsourced in accordance with ORGH.MGM.205, for compliance with the contract.

(b) Organisational set-up

(1) The accountable manager, as directly accountable for safety, should ensure, in accordance with point ORGH.MGM.210(a), that sufficient resources are allocated to compliance monitoring. When the person responsible for compliance monitoring also acts as the 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 include the following:

(i) terminology;

(ii) specified activity standards;

(iii) a description of the organisation;

(iv) the allocation of duties and responsibilities;

(v) procedures for ensuring regulatory compliance;

(vi) the compliance monitoring programme, reflecting:

(A) the schedule of the programme;

(B) audit and inspection procedures, including an audit plan that is implemented, maintained and continually reviewed and improved;

(C) reporting procedures;

(D) root cause analyses for findings identified during internal compliance monitoring activities;

(E) procedures for follow-up and corrective action; and

(F) the recording system;

(vii) the syllabus of the training referred to in point (d)(2);

(viii) document control.

(d) Training

(1) To achieve optimum outcomes of training, the GH organisation should ensure that all personnel understand the training objectives, as set out in the organisation's management system documentation.

(2) The persons responsible for the compliance monitoring function should receive training in this function. The training should cover the compliance monitoring requirements, the manuals and procedures related to the necessary tasks, auditing techniques, root cause analysis, reporting and recording.

(3) Time and resources should be allocated 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. Unscheduled audits should be possible to perform when non-compliance data shows an increasing trend. The audits should follow up on corrective actions to ensure that they

have been implemented, effective and completed, in accordance with the policies and procedures specified in the GH manual.

(2) The management system's key processes and 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).

GM1 ORGH.MGM.200(b)(6) General requirements for the management system

COMPLIANCE MONITORING — GENERAL

(a) The completion of a safety risk register is one of the most relevant methods of compliance monitoring, along with the documentation related to safety risk management and to mitigation measures and their implementation.

(b) The person(s) responsible for compliance monitoring may perform all audits and inspections themselves or appoint one or more auditors by choosing personnel with the relevant competence and qualification (as defined in point (a)(2) of AMC1 ORGH.MGM.210(g)(1)), from either within or outside the GH organisation.

(c) Regardless of the option chosen, it is recommended that the independence of the audit function remain unaffected, in particular where those persons performing the audit or inspection are also responsible for other functions within the GH organisation.

(d) When compliance audits or inspections are performed by a contracted party:

(1) it is recommended that any such audits or inspections be performed under the responsibility of the person(s) responsible for compliance monitoring within the GH organisation; and

(2) the GH organisation remains responsible for ensuring that the personnel of the contracted party have knowledge and experience relevant to the activities being audited or inspected, including qualifications and experience in compliance monitoring.

(e) The GH organisation remains responsible for ensuring the effectiveness of compliance monitoring, in particular for the effective implementation and follow-up of all corrective actions.

GM2 ORGH.MGM.200(b)(6) General requirements for the management system

COMPLIANCE MONITORING — SMALL GH ORGANISATIONS

(a) Compliance monitoring audits and inspections may be documented using 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 a GH activity should be those that make up the steps involved in the operational procedure that is applied for that activity.

COMPLIANCE MONITORING CHECKLIST Year			
Subject	Date checked	Checked by	Comments/non-compliance Report N°
GH activity			
Instructions for the provision of the GH service			
Dangerous goods instructions, if applicable			
Training			
Training records are up-to-date and accurate			
Current qualification			
Any additional licence (e.g. security, driving)			
Recurrent training, as applicable			
Refresher training, as applicable			
Documentation			
GH manual has been updated and correctly amended			
Latest amendments to regulations are included			
Operator procedures and aerodrome procedures are included and are current			
Declaration is current and valid			
Management of change is current and documented			
Safety risk register has been completed			
GSE maintenance, if applicable			
GSE maintenance programme is current and accurate			

Out-of-service GSE is correctly and visibly labelled			
Preventive maintenance has been completed			

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

AMC1 ORGH.MGM.200(d) General requirements for the management system

INTEGRATED MANAGEMENT SYSTEM

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

(a) other certificates approvals, authorisations issued or declarations submitted under Regulation (EU) 2018/1139 and its delegated and implementing acts that are intended to be covered by the integrated management system;

(b) the domains that are integrated in its management system, with the interfaces that enable effective functioning and communication between them; and

(c) applicable requirements for each domain.

GM1 ORGH.MGM.200(d) General requirements for the management system

INTEGRATED MANAGEMENT SYSTEM

(a) Organisations are expected to 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 way 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 existing management systems to comply with Commission Delegated Regulation (EU) 2025/20.

(c) The organisations mentioned in point (b) are instead expected to revise their existing management system to cover the new elements required by Commission Delegated Regulation (EU) 2025/20, in particular:

(1) the organisation's safety policy and safety risk management process;

(2) its compliance monitoring function;

(3) the duties and responsibilities of its GH personnel;

(4) interfaces with the other activities performed by the organisation;

(5) the training programme of the personnel performing GH activities;

(6) GH processes and procedures;

(7) documents and records;

(8) the policy regarding the management of change;

(9) the maintenance programme for GSE.

AMC1 ORGH.MGM.205 Contracted services or products

RESPONSIBILITIES WHEN CONTRACTING SERVICES

(a) The GH organisation may contract certain activities included in the scope of its declaration to third-party service providers, including 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 service provider has the necessary authorisation or approval to provide the services, as required, that the services are appropriate for the purpose, and the contracted service provider has the resources and expertise to undertake the task.

(e) The GH organisation should notify the aircraft operator and/or aerodrome operator concerned, where relevant, of any services carried out by third parties on its behalf.

AMC2 ORGH.MGM.205 Contracted services or products

AUDITS PERFORMED BY THIRD-PARTY AUDITORS

(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 point 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 applies an evaluation method designed to assess the operational, management and control systems of the GH organisation;

(3) the third-party auditor and its evaluation method are independent and the auditors are impartial;

(4) the auditors are appropriately qualified and have sufficient knowledge, experience and training, including on-the-job training, to perform their allocated tasks;

(5) audits or at least the parts of them verifying the GH operations are performed on-site;

(6) access of the third-party auditor to the relevant data and facilities is granted at the level necessary to verify compliance with the applicable requirements;

(7) the GH organisation is granted access to the full audit report;

(8) procedures have been established for monitoring continued compliance of the organisation with the applicable requirements; and

(9) procedures have been established to notify the GH organisation of any non-compliance with the applicable requirements and findings raised, the corrective actions to be taken, the follow-up of these corrective actions and the closure of findings.

(b) The full audit report of the third-party auditor should be made available to the competent authority upon request.

GM1 ORGH.MGM.205 Contracted services or products

THIRD-PARTY SERVICE PROVIDERS

(a) It is recommended that the GH organisation consider, 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 the safety of its own operation.

(b) If the contracted service is a GH service listed in Article 2(2) of Commission Delegated Regulation (EU) 2025/20, the provider of those services is bound to comply with that Regulation.

AMC1 ORGH.MGM.210 Personnel

CUMULATION OF FUNCTIONS

(a) The cumulation of several functions into one person's role, including the function of an accountable manager, should depend on the size of the organisation and the scale of its operation. The person should meet two main conditions, namely to be competent and to have the capacity to fulfil their 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.

AMC1 ORGH.MGM.210(c) Personnel

RESPONSIBILITIES OF THE SAFETY MANAGEMENT FUNCTION

The GH organisation should establish a safety management function and a safety review board in the organisational structure. If more than one person is designated for the safety management function, the accountable manager should identify the person who acts as the unique focal point (i.e. the safety manager).

(a) The safety manager should act as the focal point and be responsible for the development, management and maintenance of an effective SMS. The safety manager should perform the following duties and responsibilities:

(1) act as a focal point for the safety aspects of the GH activities, as per ICAO Doc 9859 (Section 9.3.6);

(2) monitor safety concerns in the aviation industry;

(3) coordinate and communicate with the competent authority and with the accountable manager;

(4) facilitate hazard identification, risk analysis and management;

(5) monitor the implementation of actions taken to mitigate risks, as listed in the safety action plan;

(6) provide periodic reports on safety performance;

(7) ensure the maintenance of safety management documentation;

(8) ensure that safety management training is available and that it meets acceptable standards;

(9) provide independent advice on safety matters;

(10) ensure the 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 with over 25 FTEs, the safety management function should be independent of operational line management.

AMC2 ORGH.MGM.210(c) Personnel

SAFETY MANAGER

(a) Depending on the size of the GH organisation, the safety manager may be assisted by additional safety personnel to enable the performance of all tasks related to safety management.

(b) Regardless of the organisational set-up, it is important that the safety manager remains the unique focal point as regards the development, administration and maintenance of the operator's SMS.

COMPETENCIES OF THE SAFETY MANAGER

(c) The safety manager supports, facilitates and leads the implementation and maintenance of the SMS, fostering an organisational culture that ensures effective safety management, risk management and occurrence reporting. The competencies of the safety manager should include, but not be limited to, the following:

(1) knowledge of:

(i) ICAO standards and European requirements and provisions on safety management, related to:

(A) monitoring safety performance,

(B) conducting safety risk assessments,

(C) managing safety information databases (systems),

(D) investigating reportable matters and hazardous events;

(E) safety promotion/communication methods;

(ii) basic safety investigation techniques;

(iii) human factors in aviation;

(2) other suitable skills and competencies include:

(i) promotion of a positive safety culture,

(ii) interpersonal, influencing and leadership skills,

(iii) oral and written communication skills,

(iv) data management, analytical and problem-solving skills,

(v) computer skills; for example, in word processing, spreadsheets and database management,

(vi) professional integrity.

(d) The safety manager should have work experience, relevant and documented, preferably in a comparable position, in any of the following areas:

(1) management systems, including compliance monitoring systems, and safety management;

(2) GH operations.

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

COMPLIANCE MONITORING FUNCTION

Those performing the compliance monitoring function should be responsible for ensuring that the compliance monitoring process established in accordance with point ORGH.MGM.200(b)(6) is properly and consistently implemented and continued compliance with the applicable regulatory requirements.

(a) If more than one person is appointed to perform the compliance monitoring function, the accountable manager should identify the person who acts as the unique focal point (i.e. the 'compliance monitoring manager').

(b) The person(s) responsible for compliance monitoring should:

(1) be able to demonstrate relevant knowledge of, and appropriate experience in GH operations, and qualification(s) and experience in compliance monitoring;

(2) have knowledge of the applicable requirements in the GH domain; and

(3) have access to all parts of the GH organisation and, as necessary, any contracted service provider.

(c) 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).

(d) If the compliance monitoring function and the safety management function are cumulated in one person, the accountable manager should ensure that:

(1) sufficient resources are allocated to both functions, considering the size and complexity of the organisation;

(2) the person is qualified and competent to perform both functions;

(3) any potential conflict of interest between the two functions is addressed.

(e) 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(j) Personnel

SUFFICIENT PERSONNEL

The GH organisation should plan in advance to ensure that it has sufficient personnel during peak periods, where the number of aircraft to be serviced is expected to be above the average level for which the GH organisation is prepared.

GM1 ORGH.MGM.210(j) Personnel

PLANNING SUFFICIENT PERSONNEL FOR SAFE PROVISION OF GH SERVICES

To determine an appropriate number of qualified personnel as sufficient to ensure the safe provision of GH services, it is recommended that the GH organisation perform a task and resource analysis. It may consider several aspects, such as:

(a) types of GH services provided as per the declaration and tasks planned;

(b) number of stations covered;

(c) peak seasons and changes to the seasonal flight programmes;

(d) number of aircraft operators to which it provides services;

(e) estimated number of ad hoc requests for GH services per season;

(f) any GH services contracted to third parties.

AMC1 ORGH.MGM.215 Facilities

STORAGE AREA FOR DANGEROUS GOODS

The GH organisation should ensure the following at the storage area for dangerous goods:

(a) A map of the dangerous goods storage facility is provided at all storage facilities and dangerous goods acceptance areas, indicating the following:

(1) purpose of the storage facility, including the 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 paint or red-and-white-striped ribbon;

(3) if applicable, the point of loading/unloading from/to ULDs or build-up of ULDs;

(4) public area or airside safety (restricted) area;

(5) entrance, exit and area for transit to the storage facility/warehouse;

(6) dangerous goods acceptance area;

(7) if applicable, positioning of X-ray equipment;

(8) positioning of fire extinguishers.

(b) Any necessary approvals from other state entities — for example, for environmental protection, emergency response or the storage of explosive or radioactive material, are obtained in advance, or such approvals are obtained by the aerodrome operator providing the storage facility.

(c) Fire extinguishers specific to dangerous goods are stored and instructions for their use are available at the location.

(d) The storage conditions are adequate to address the specific hazards of the dangerous goods classes and divisions to be stored in the facility.

(e) Dangerous goods are segregated in accordance with ICAO's Technical Instructions.

(f) The acceptance point is located as close as possible to the storage facility and properly marked as the dangerous goods acceptance point.

(g) A copy of the international standards and recommended practices for dealing with dangerous goods is available at the acceptance point.

(h) Emergency response procedures are easy to access or displayed in a visible location.

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

GM1 ORGH.MGM.220 Software used for the provision of ground handling services

SOFTWARE

(a) Any of the software used by the GH organisation to provide GH services is in the scope of point ORGH.MGM.220 if its malfunction would endanger the safety of a flight. The following list of activities or processes for which software is used is not exhaustive:

(1) departure control;

(2) turnaround coordination;

(3) de-icing/anti-icing documentation or management of holdover time tables;

(4) ramp resource planning;

(5) driving and operation of autonomous vehicles;

(6) baggage and cargo sorting, and processing/preparation of baggage and cargo for loading;

(7) processing and documentation of cargo or dangerous goods or completion of load control documentation.

(b) Before using new software, it is recommended that the GH organisation ensure, when feasible, that it has been properly tested for use in an aviation environment, is robust enough for use in daily operation and does not pose a risk to the safety of operations.

(c) Testing the software is recommended to ensure that it is fully functional following updates.

GM1 ORGH.MGM.220(b) Software used for the provision of ground handling services

AUTHORISED PERSONS

The term 'authorised persons' is used in relation to the following, 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 — general requirements

SUBMITTING A DECLARATION

(a) The GH organisation should submit its declaration or amended declaration at least 10 working days before starting the operation or before the changes indicated become effective, respectively. This point does not apply to GH organisations that were already operating on the date of applicability of Commission Delegated Regulation (EU) 2025/20. Such GH organisations should comply with Article 3(3) of that Regulation.

(b) It is the responsibility of the GH organisation to ensure that the declaration has been successfully submitted to the competent authority. If the organisation does not receive acknowledgement of receipt of the declaration from the competent authority, as indicated in point ARGH.OVS.320

of Commission Implementing Regulation (EU) 2025/23 and AMC1 ARGH.OVS.320(a), it should contact the competent authority.

GM1 ORGH.DEC.100 Declaration — general requirements

GENERAL

The intention of a declaration is to:

(a) have the GH organisation acknowledge its responsibilities under the applicable safety regulations;

(b) inform the competent authority of the existence of a GH organisation; and

(c) enable the competent authority to conduct oversight in accordance with Subpart ARGH.OVS of Commission Implementing Regulation (EU) 2025/23.

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

NOTIFICATION

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

GM1 ORGH.DEC Appendix 1 — Declaration form

INDUSTRY STANDARDS/GOOD PRACTICES TO BE DECLARED

See GM1 ORGH.GEN.125. The list is not exhaustive.

SUBPART DOC — DOCUMENTS AND RECORDS

AMC1 ORGH.DOC.100 Documents and records system

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 the event of changes to hardware or software containing records, the GH organisation should ensure that all the necessary data continues to be accessible at least for the full period specified in point ORGH.DOC.105.

(d) The retention period for records starts when the record is created or amended.

GM1 ORGH.DOC.100 Documents and records system

DATA BACKUP

It is recommended that the GH organisation ensure, whenever possible, that all computer hardware used for data backup is stored in good conditions and in a different location from that containing the working data.

AMC1 ORGH.DOC.110 Ground handling manual

GENERAL

(a) The GH manual or parts of it may be presented in any form, including electronic form. In all cases, the GH organisation should ensure that the manual is accessible, usable and reliable.

(b) The GH manual should be such that:

(1) all parts of it are consistent and compatible in form and content;

(2) it can be easily revised;

(3) the parts that address 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, approvals or authorisations, or declares that it performs other activities in the scope of Regulation (EU) 2018/1139;

(4) its content and revision status are controlled and clearly indicated.

(c) The GH manual should include a description of the process for its amendment and revision, specifying:

(1) the person(s) who may approve amendments or revisions;

(2) the specific conditions for temporary revisions and/or immediate amendments; 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 amendments to the manual.

(d) The GH manual's content may be based on, or refer to, industry standards and good practices.

(e) The GH manual may contain parts of, or refer to, other relevant controlled documents, such as the aerodrome manual of the aerodrome where the GH organisation provides services, other manuals, industry standards or good practice material. If the GH organisation uses material from another source, that material should either be copied and included directly in the relevant part of the GH manual or the GH manual should contain a reference to the appropriate section of that applicable material.

(f) A translated version of the relevant parts of the GH manual is an accepted means of complying 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 GH manual should be reviewed to determine any necessary updates not later than every 24 months, to ensure that it remains current.

AMC1 ORGH.DOC.110(a) Ground handling manual

CONTENT OF THE GH MANUAL

(a) The GH manual should cover the following main topics, either as a single document or in several documents that are cross-referenced with one another (the order and numbering of the topics may vary; other topics may be added as well):

(0) administration and control of the GH manual;

(1) management system of the GH organisation:

1.1. organisational structure, including accountability and responsibilities,

1.2. personnel,

1.3. description of the management system, including:

1.3.1. SMS, including the ERP and emergency procedures of the aircraft operator(s) and aerodrome operator(s),

1.3.2. management of change,

1.3.3. compliance monitoring process, including an audit programme and procedure for continuing improvement,

1.3.4. procedures for reporting to the competent authority and other organisations, including notifying and reporting accidents, serious incidents, occurrences and near-miss events and sharing safety-relevant information,

1.3.5. procedures related to the consumption of alcohol, psychoactive substances and medicines,

1.3.6. documentation and record-keeping system;

1.4. safety assurance of services contracted to organisations not subject to a certification or declaration scheme or an authorisation regime under an (EU) aviation regulation;

(2) training, assessment and qualification programmes for GH personnel:2.1. identification and description of training standards and objectives,

2.2. required qualifications/competencies for each GH function/role,

2.3. training gap analysis – process and procedures,

2.4. training and assessment programme for each GH function/role in the organisation,

2.5. additional training (as defined by the GH organisation and as applicable for each GH function/role), which may be non-operational training,

2.6. conditions (qualification criteria) for trainers/instructors and assessors;

(3) standard operational procedures and other guidance or instructions for each type of GH service provided, including:

3.1. procedures and instructions for the GH organisation,

3.2. procedures and instructions for the aerodrome operator,

3.3. procedures and instructions for the aircraft operator(s),

3.4. airside safety;

(4) 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 tasks and procedures for each GH function/role;

(6) security procedures;

(b) The standard operational procedures mentioned in paragraph 3 of the GH 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 and safety and operation of GSE and other vehicles used for GH services,

3.2. hand signals for GSE,

3.3. aircraft refuelling and defuelling – that is, 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. long-term aircraft parking;

(5) load control process:

5.1. principles,

5.2. tasks,

5.3. responsibilities,

5.4. the load control process itself and operational procedures including mass and balance calculations and load planning,

5.5. messaging and communication procedures,

5.6. documentation;

(6) ground supervision;

(7) cargo operations.

(c) The interfaces with the aerodrome operators and the aircraft operators should be highlighted in each section where they are established.

GM1 ORGH.DOC.110(b);(c) Ground handling manual

GH MANUAL

(a) Organisations may use different names for this manual, as the concept is not new. Depending on the type of organisation that provides GH services, this document may have different names, such as ‘ground operations manual’, ‘operations manual’, ‘ground service manual’ and ‘ground handling service manual’.

(b) The ‘GH manual’ is a generic name for the document or the set of documents used by the GH organisation to support it in discharging its responsibilities for the safe provision of GH services in compliance with the applicable requirements. It contains all the necessary instructions, information, policies, procedures for the provision of services, the training programme, the description of the organisation’s management system and the performance of duties by personnel, as well as for the operation and maintenance of the GSE used.

(c) The GH organisation has full freedom to decide how the content of its GH manual is integrated into its documentation system. For example, the GH manual could be either:

(1) a stand-alone document;

(2) a set of separate documents containing processes and procedures that cover its management system, with cross-references to one another; or

(3) integrated in another of its existing manuals.

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 GH manual could be those developed by various organisations, such as ICAO, the competent authorities, aerodrome operators, aircraft operators, aircraft manufacturers and GSE manufacturers, or documents such as industry standards or manuals published by industry associations and organisations.

(b) Examples of documents that may be used:

(1) ICAO Annexes, documents and manuals;

(2) the manuals of the operators of the aerodromes where the GH organisation provides services;

(3) aircraft operators' operations manuals;

(4) de-icing manuals;

(5) aircraft fuelling manuals;

(6) aircraft manufacturers' manuals;

(7) IATA documents and standards, such as but not limited to those referred to in GM1 ORGH.GEN.125;

(8) IBAC documents and standards for GH provided to business aviation operators;

(9) SAE standards for aircraft de-icing/anti-icing on the ground;

(10) good practice documents developed by the GH operations safety team;

(11) operational procedures for safety stacks at aerodromes;

(12) GSE manufacturers' manuals.

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

ACCEPTABLE CONDITION OF A GH MANUAL

The acceptable condition of a GH manual implies the following criteria, considering human factors principles. The list is not exhaustive:

(a) It is legible, the layout is clear and the content is organised in a logical way.

(b) The text and pictures, diagrams or charts are unambiguous, leaving no room for interpretation.

(c) The language is concise, coherent and easy to understand.

(d) Abbreviations and acronyms are spelled out in a list in the document in which they are used.

(e) Charts and diagrams are clear and easy to follow.

(f) If colour codes are used, they are explained in the manual and clearly differentiated.

(g) If any parts of the GH manual are translated, the translations do not contain operational errors that may jeopardise safety and they are up to date.

(h) Symbols are explained.

SUBPART TRG — TRAINING OF GROUND HANDLING PERSONNEL

AMC1 ORGH.TRG.100 Training and assessment programme

GENERAL

(a) The training and assessment programme should be flexible enough to cater for specific needs related to the delivery method, such as online training or classroom training.

(b) Training and assessments may be delivered either internally by the GH organisation's qualified instructors or externally by a qualified training provider. If the delivery of the training and assessment programme is contracted to an external provider, the responsibility for the standards and quality of the programme remains entirely with the GH organisation.

(c) The GH organisation's training and assessment programme should include the following elements:

(1) the process for conducting a training gap analysis and criteria to enable crediting of training received by an individual from other organisations prior to employment at the current organisation;

(2) defined training objectives and targets for training and assessment for the trained GH functions;

(3) a training and assessment plan enabling the development of knowledge, skills and attitudes (KSAs) components and ensuring error-free learning;

(4) standards for training material, including procedures of the aircraft operators to which GH services are provided, 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 function;

(7) a description of methods and intervals for recurrent assessment and subsequent retraining;

(8) criteria for the competence and qualifications of instructors and assessors;

(9) a description of procedures for evaluation of the training process; provision of feedback, including anonymous feedback; and improvement of the training process to ensure that the training objectives are met.

(d) The knowledge and skills components of training should go hand in hand. The attitude component should be integrated as early as possible into the training process.

(e) The training and assessment programme should reflect the daily tasks performed by the trainees. The assessment should be conducted using live or simulated operations, to confirm that the individual being trained can perform the tasks correctly.

(f) Training and assessment using online tools should be conducted on-site to ensure the validity of the results.

(g) The GH organisation should allocate a sufficient amount of time for the completion of the required training courses.

AMC2 ORGH.TRG.100 Training and assessment programme

ASSESSMENT

(a) Assessments should address the required KSAs.

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

(c) Written evidence of an assessment should specify which elements were assessed, when they were assessed and the results of the assessment. Where the operational assessment shows a performance failure or lack of knowledge, the instructor/assessor should retrain the trainee to both correct their performance and fill any knowledge gaps.

(d) Upon successful completion of the assessment phase, the training and assessment should conclude with the issuance of a document confirming that the trainee has successfully completed the training and is qualified for the function in which they received training.

(e) The GH organisation should establish procedures:

(1) for a situation in which an individual fails the assessment;

(2) to ensure that the instructor/assessor reviews the incorrect answers together with the trainee in order that the trainee's knowledge is 100 % error free on leaving the learning environment.

AMC3 ORGH.TRG.100 Training and assessment 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 with their role.

(b) The training should be based on the operational procedures applied by individuals in their daily activities 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 assigned tasks under supervision.

(d) The training should be completed by a final assessment of the individual's competence to perform their assigned tasks in accordance with the relevant standards and safety objectives and to ensure error-free learning.

(e) Training to ensure continued competence should be provided, as applicable, in accordance with point ORGH.TRG.100(d).

(f) The training may be provided internally or by a third party.

(g) Training and assessment using online tools should be conducted on-site to ensure the validity of the results.

GM1 ORGH.TRG.100 Training and assessment programme

ASSESSMENT AND ERROR-FREE LEARNING

(a) It is recommended that some assessments be conducted in pairs or groups, to allow trainees to assess themselves by comparing themselves to others and to avoid subjective assessment. Criteria should be clearly identified to indicate when a standard has been met. For example, the correct responses to questions should be available for any assessor marking an exam.

(b) The development and assessment of skills and attitudes within a group could be based on tasks allowing interaction during communication, workload management, problem-solving and decision-making, and teamwork.

(c) An individual's attitude is developed and monitored along with the knowledge and skills components of training. Their attitude is closely linked to their motivation. It can be assessed based on the quality of their participation in the training or by designing exercises that require them to use attitude-related competencies, such as communication, situational awareness, problem-solving and decision-making. The attitude component monitors the development of an individual's awareness of their role in maintaining and improving safety, and in fostering a safety culture.

(d) Error-free learning should not be understood as meaning that a trainee must pass every exam with a score of 100 %. It means that the assessor discusses the incorrect answers with the trainee to correct any misunderstandings, while their original exam mark remains unaltered. If the trainee fails an exam, they are required to complete a resit.

GM1 ORGH.TRG.100(a) Training and assessment programme

TEMPORARY AND LEASED GH PERSONNEL

Temporary and leased GH personnel are included in the scope of point ORGH.TRG.100.

GM1 ORGH.TRG.100(b) Training and assessment programme

STEP-BY-STEP PROCESS FOR TRAINING AND ASSESSMENT PROGRAMME DEVELOPMENT

Step 1. Perform a training gap analysis — what is the level of training and qualifications of the trainee in the relevant function before training, and what should it be after training?

Step 2. Set the training objectives, based on the safety objectives to be achieved by that GH function. These are usually expressed in general sentences.

Step 3. Set the training targets, based on the tasks specific to the GH function established in Step 1 (see examples of safety-critical functions in GH below). These are expressed through specific sentences that detail what the trainee should be able to do at the end of their training. The training targets should be realistic – that is, things that the individual is usually expected to do during their daily activities. They should also address the operational risks to be mitigated through training.

Step 4. The tasks that the trainee should be able to perform are usually described in their job profile. The choice of tasks will determine the conditions under which the meeting of training targets has to be demonstrated. Those conditions represent the operational and environmental context in which the operations take place and the tools used for the execution of the service (equipment, systems, etc.). Multiple tasks can and should be integrated into one exercise or one assessment scenario.

Step 5. Develop the training and assessment programmes based on the development of KSAs. Create exercises based on real tasks from daily operations and reflecting the operational context of the aerodrome in which the GH organisation provides services. To create realistic exercises, the trainer should use the GH manual and specific procedures of the organisation, including the procedures provided by the aircraft operators to which services are provided, safety data from reported events and the organisation's tools, equipment or GSE, as required. Elements of the applicable regulations should also be integrated into the course and exercises.

Step 6. Design the training plan for each phase of training and determine the minimum number of hours to be allocated to the training (both theoretical and practical) and the phases of assessment, including on-the-job training and allowing sufficient time for training delivery, learning, testing and retraining.

Step 7. Develop the assessment process and tools, tests, the pass/fail grading system, the procedures for error-free learning and the procedure for retraining.

Step 8. Develop a feedback tool for the trainees.

Step 9. Assess the training process, identifying areas for improvement to better address the risks and targets. Improve the training and assessment programme.

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

TRAINING GAP ANALYSIS AND CREDITING OF PREVIOUS TRAINING

(a) During the training gap analysis, the GH organisation should consider the mutual recognition and crediting of the GH training and skills attained by individuals in the interest of facilitating mobility across the GH industry workforce. This mutual recognition and crediting of previous

training should be based on a common training syllabus and the alignment of assessment methods and marking.

(b) The training gap analysis should be performed to each individual before enrolling them for training.

(c) The GH organisation should develop a procedure for crediting training received by an individual from a previous organisation. The procedure should include measures to assess the following, as a minimum, and this assessment should be stored as part of evidence of the individual's training record:

(1) the content of the previous training;

(2) whether the previous training was delivered by suitably qualified personnel or organisations;

(3) whether the knowledge and skills required for the execution of the operating procedures trained during the previous training were based on the same industry standards, best practices or common procedures used among several GH organisations or self-handling aircraft operators.

(d) Evidence of an individual's previous training should be recorded where it exists.

(e) Where previous training delivered by suitably qualified personnel or organisations is found to satisfy the training standards of the GH organisation, including the function-specific training, on-the-job and continued competence training, that previous training may be credited, and the GH organisation may apply only a differences training to cover the specific elements. Such a difference training should cover all items not credited from previous training.

(f) The GH organisation continues to remain responsible for all the training required by Subpart ORGH.TRG, regardless of whether the training is provided by itself, another GH organisation or a contracted training provider.

(g) The GH organisation should be satisfied that at the end of the training gap analysis, crediting of previous training and, if necessary, application of differences training, the individual is competent to perform the assigned tasks in accordance with the objectives and standards established by the organisation and included in its GH manual.

GM1 ORGH.TRG.100(b)(6) Training and assessment programme

ON-THE-JOB TRAINING

On-the-job training is a component of the training programme conducted in the operational environment. It combines the KSAs acquired during the previous phases of training in a realistic environment. This component of training is different from the development of skills, which is carried out in a training environment.

AMC1 ORGH.TRG.100(c) Training and assessment programme

TRAINING COURSES BY GH ACTIVITY

(a) GH training courses should cover the following, as applicable to the specific function and assigned tasks:

(1) passenger handling, including the provision of assistance to passengers with reduced mobility (PRMs):

(i) training required by Regulation (EC) No 1107/2006 (applicable to PRM),

(ii) training on dangerous goods,

(iii) as applicable, training on the movement of persons on the apron in accordance with Regulation (EU) No 139/2014; and

(iv) as applicable, training on the operation of equipment (ambulift, medilift, etc.) used for PRM boarding and disembarking;

(2) baggage handling;

(3) ramp handling and aircraft arrival and departure activities;

(4) aircraft towing/pushback;

(5) aircraft ground de-icing/anti-icing;

(6) aircraft refuelling/defuelling;

(7) aircraft exterior cleaning;

(8) potable water servicing;

(9) lavatory servicing;

(10) aircraft loading/unloading and stowage and securing of load;

(11) loading supervision;

(12) operation of GSE, operation of elevating equipment and hand signals for GSE guidance;

(13) operation of PBBs;

(14) turnaround coordination, for those performing the specific turnaround coordination function and, for all GH personnel involved in GH activities on the apron during turnaround, awareness training on safety in 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) departure control systems and any other IT tools and equipment used by the GH organisation and required by the operational procedures of the aircraft operators;

(21) all-weather operations and operations in winter conditions, as applicable.

(b) For other training courses — for example, in the areas of dangerous goods, security and vehicle driving, the intervals for recurrent training established by the relevant regulations apply.

AMC2 ORGH.TRG.100(c) Training and assessment programme

SAFETY AND SMS TRAINING

The safety and SMS training should cover the following elements:

(a) Mitigation of safety risks in the following GH 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;

(6) aircraft refuelling, including the initial intervention in the event of a fuel fire, the use of fire extinguishers, and summoning of the rescue and firefighting service in the event of a fire or major fuel spill;

(7) aircraft loading and unloading;

(8) aircraft pushback/towing;

(9) aircraft de-icing/anti-icing.

(b) Safety and awareness training specific to working safely on the apron and around aircraft with other GH organisations, particularly during potentially high-risk activities such as aircraft refuelling.

(c) Knowledge of aspects of the SMS tailored to the responsibilities associated with the GH functions, with a focus on hazard identification, safety risk assessment and risk mitigation. The SMS training should include practical exercises, mainly to enable trainees to practice hazard identification and safety risk assessment, and to enhance the understanding by front-line personnel of the purpose of safety management and safety culture.

(d) Safety culture and a just culture.

(e) Safety reporting, including the reportable events detailed in Commission Implementing Regulation (EU) 2015/1018. The focus should be on understanding why it is important to report safety events or near-miss events and how to use the reporting tool.

(f) The GH organisation should also comply with the training requirements applicable to it and included in Regulation (EU) No 139/2014, particularly point ADR.OR.D.017 and the related AMC1 ADR.OR.D.017(a);(b) and ADR.OR.D.017(c);(d) on SMS training.

AMC3 ORGH.TRG.100(c) Training and assessment 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 GH 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/anti-icing facilities,

(2) centralised baggage handling system,

(3) PBBs,

(4) equipment for the boarding and disembarkation of PRMs.

(c) The training for the operation of the relevant equipment, facilities or installations should be delivered in accordance with the instructions provided by the aerodrome operator or, if available, the manufacturer of that equipment, facility or installation.

AMC4 ORGH.TRG.100(c) Training and assessment programme

AWARENESS TRAINING ON AIRCRAFT REFUELLING/DEFUELLING

(a) The GH organisation should ensure that the personnel performing various tasks around the aircraft during turnaround undergo a minimum level of safety awareness training, with a focus on safety risks of apron operations during aircraft refuelling/defuelling and the associated safety precautions.

(b) The organisation should have means of checking that personnel understand and apply the safety precautions at all times when working around the aircraft during refuelling/defuelling.

AMC5 ORGH.TRG.100(c) Training and assessment programme

OTHER TRAINING COURSES

(a) The training programme should include training on the following areas, as applicable to individuals' specific GH functions and assigned tasks.

(1) Accident/incident investigation

(2) Root cause analysis

(3) Any additional training as required by the aircraft type and the type of technology and energy used for aircraft propulsion

(4) Ramp resource management (RRM), which is team-related training for personnel and their supervisors executing GH tasks on the apron during aircraft turnaround. The objective of this training is to ensure effective communication on the airside, the safe provision of services and effective use of all available resources — people, equipment and

information — to optimise ground and flight safety and the efficiency of aircraft turnaround. Elements of RRM may be included in other GH training courses, such as those relating to human factors or safety, or RRM training may be delivered as a stand-alone course.

(b) Other training courses that should be included in the training programme, as applicable to individuals' specific GH functions, may be required for compliance with other regulations. Examples of such courses are:

(1) FOD, in accordance with Regulation (EU) No 139/2014;

(2) airside driving, in accordance with Regulation (EU) No 139/2014;

(3) control of pedestrians, in accordance with Regulation (EU) No 139/2014;

(4) operating in low-visibility conditions and winter, in accordance with Regulation (EU) No 139/2014;

(5) aviation security;

(6) emergency response procedures, as appropriate to assigned roles and in accordance with aircraft operators' and aerodrome operators' manuals and procedures;

(7) various software used by GH organisations and necessary for individuals to perform their tasks in accordance with the established standards and objectives.

GM2 ORGH.TRG.100(c) Training and assessment programme

AWARENESS TRAINING ON SAFETY IN TURNAROUND ACTIVITIES ON THE APRON DURING AIRCRAFT REFUELLING AND DEFUELLING

It is recommended that the training material supporting AMC4 ORGH.TRG.100(c) follow the JIG standards and cover the following aspects as a minimum:

(a) for all GH personnel performing tasks around the aircraft at the same time (during turnaround):

(1) the work environment and the importance of situational awareness in staying safe and keeping others safe;

(2) the dangers of fuelling – what can go wrong during aircraft refuelling (e.g. ground damage or incidents involving hydrant pits or fuel trucks);

(3) fuel spillage;

(4) fuelling safety zone;

(5) how to stop a fuelling vehicle if the operator is incapacitated;

(6) emergency stop button;

(b) for personnel performing tasks related to fuelling operations, in addition to the elements of point (a):

(1) fuel knowledge and basic safety, bonding, public protection, fire classification and extinguisher types, control of access to storage areas, fire safety and misfuelling prevention;

(2) regular testing and checks of fuel, hoses and electrical bonding;

(3) procedures for ensuring fuel quality in storage or prior to refuelling (as appropriate);

(4) manoeuvring of elevating platforms;

(5) securing the fuel truck to prevent movement during fuelling;

(6) walkaround of the fuel vehicle before moving;

(7) fire extinguishers, including hand-held fire extinguisher training;

(8) operation of fuel truck or other equipment used for refuelling/defuelling;

(9) aerodromes' local procedures;

(10) human factors, including elements of enhancing situational awareness;

(11) additional elements necessary for fuelling supervisors.

GM3 ORGH.TRG.100(c) Training and assessment programme

HUMAN FACTORS AND HUMAN PERFORMANCE

(a) General elements guiding the design of training programmes to develop knowledge and skills in relation to human performance can be found in the *Human Factors Training Manual* (ICAO Doc 9683). However, it should be taken into account that the ICAO documents are not specifically based on the human factors in GH.

(b) Human factors training is intended to enhance attitudes conducive to safe and efficient GH operation. The development of soft skills such as those listed below increases the likelihood of the candidate successfully completing the training programme and acquire the desired competence:

(1) interpersonal, communication and language skills,

(2) ability to be a team player,

(3) ability to work well under pressure and manage stressful situations,

(4) capacity to focus and avoid distractions.

(c) Training to develop situational awareness addresses and mitigates the incorrect or inadequate perception of individuals in an aerodrome and GH operational environment. It also addresses 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 reduced training opportunities and staffing or other resource issues can often mean that the personnel are not fully cognisant of the potential dangers of their working environment. At the other end of the continuum, longer-

serving personnel 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, and how they process risk information and make decisions or take actions based on that information, both consciously and unconsciously. The key findings from the literature that are relevant to GH 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) people often overestimate their own capability or invulnerability and underestimate the severity of outcomes;

(4) the perception of risk becomes normalised over time.

(d) Training objectives: In order to take appropriate action in any given situation, the individuals are expected to:

(1) have a good understanding of the risks associated with working around aircraft;

(2) be able to accurately perceive risk – this involves providing a correct assessment of the likelihood and severity of the impact of a risk, which is subjective and is based on what people know and think (cognition), how they feel (emotion), and their experience, age and characteristics, 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.

GM4 ORGH.TRG.100(c) Training and assessment programme

RAMP RESOURCE MANAGEMENT

(a) RRM and communication, including language proficiency (languages used in accordance with point 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 if they are improperly managed or mastered.

(b) Training on RRM is a mitigation measure to ensure the safety of GH services on the apron, in addition to the implementation of the standard operational procedures and compliance with the GSE requirements. The RRM training syllabus supporting document (NLR-TR-2012-483-tr)[3] may be used as a basis to develop RRM training elements.

[3] Balk, A. D., Boland, E. J., Nabben, A. C., Bossenbroek, J. W., Clifton-Welker, N. et al., *Ramp Resource Management Training Syllabus Development*, NLR-TR-2012-483, Netherlands Aerospace Centre: Air Transport Safety Institute, Amsterdam, 2012, RRM training syllabus supporting document NLR-TR-2012-483-tr | EASA.

(c) The ultimate goal of RRM is to prevent aircraft accidents through reducing errors during the aircraft turnaround process and managing the effects of errors that still occur. The purpose of the RRM training is to:

(1) decrease the number of instances of aircraft/equipment damage and personal injuries;

(2) increase awareness and recognition of human factors and their effect on aircraft turnaround;

(3) improve safety barriers against human error;

(4) decrease disruption to operations;

(5) increase efficiency;

(6) increase individuals' awareness of being part of a larger and more efficient team.

(d) The effectiveness of the RRM training is enhanced if it is:

(1) based on the operational environment,

(2) integrated into the current HF training as much as possible,

(3) realistic and practical,

(4) scheduled outside peak hours.

(e) The RRM training is expected to cover the following key areas of risk, which are all found in interfaces and communication between the individuals or stakeholders involved in aircraft handling activities:

(1) between the members of a team of stakeholders involved (e.g. a loading team),

(2) between different stakeholders (e.g. aircrew and GH personnel, aerodrome operator personnel and GH personnel),

(3) between humans and technology (e.g. computerised turnaround coordination, interpretation of a docking system display),

(4) between humans and procedures (e.g. approaching an aircraft during the arrival process),

(5) between humans and the environment (e.g. weather conditions, low visibility, slippery apron).

(e) It is recommended that the RRM training reflect the operational context at the aerodrome(s) where the GH organisation provides services. It is also recommended that the RRM training be included in or closely linked to training related to human factors.

(f) The following learning objectives of the RRM training covering components of KSA can be used (source indicated in point (b)).

Topic	Element	Knowledge	Behaviour
Turnaround process	Turnaround process	Understanding the 'bigger' picture	Feels part of a larger process

	Type and role of actors	1. Understanding the roles and interests of other players 2. Understanding similarities and differences in interests	1. Focuses on common goals 2. Considers interests of other actors
	Dependencies/interfaces	Understanding the dependencies/interfaces between the various players/processes	1. Considers the importance of safe aircraft handling 2. Considers the limitations of other players
	Situational awareness (risk awareness)	1. Awareness of high-risk situations/areas 2. Awareness of risk consequences	1. Remains alert to hazards 2. Alerts colleagues/other organisations' personnel to hazards
	Pressures on the process	Awareness of pressures and their effect on the turnaround process	Adequately manages pressures to avoid additional hazards
Applicable regulations (safety, security)	Regulation (EU) 2025/20 Regulation (EU) No 139/2014 Regulation (EU) No 965/2012	Awareness of applicable regulations concerning the safe provision of GH services	1. Adheres to procedures 2. Motivates 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's objectives 2. Feels responsible for team performance 3. Understands their role in the team 4. Takes the physical, emotional and mental state of other team members into account 5. Actively participates in the team's activities 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's safety culture	1. Leads by example 2. Motivates team members to work safely 3. Takes a fair share of the team's workload 4. Applies assertive communication
	Communication	1. Awareness of the importance of good communication 2. Awareness of the advantages of standardised communication 3. Awareness of potential communication breakdowns	1. Uses standardised communication 2. Verifies that messages are understood 3. Asks for clarification if the message is unclear
	Cultural, ethnic and educational differences	1. Understanding of cultural, ethnic and educational differences 2. Understanding of how differences may increase risk 3. Understanding of why conflicts arise and strategies to solve them	1. Treats others with respect 2. Asks for clarification when unsure 3. Speaks up when necessary 4. Clarifies misunderstandings 5. Keeps calm in conflicts 6. Suggests solutions to conflicts 7. Concentrates on **what** is right instead of **who** is right
	Team situational awareness	1. Awareness of the importance of knowing what is going on around you 2. Awareness of the condition of equipment 3. Anticipation of potential threats and errors	1. Stays aware of activities going on around them 2. Checks equipment status 3. Reacts appropriately to potential threats and errors

Threat and error management	Threat identification	Knowledge of how to identify threats	Correctly identifies threats
	Threat management	Knowledge of how to manage threats	Applies appropriate mitigation strategies for the threats and risks identified
	Error identification	Knowledge of types and consequences of errors (what can go wrong?)	1. Identifies errors 2. Reports errors without losing face
	Error management	Knowledge of how errors can be managed to reduce risks (how do you handle them?)	1. Appropriately manages errors 2. Learns from errors
Human performance and limitations	Time pressure	Knowledge of how time pressure affects human performance	1. Notices when time pressure starts to affect human performance 2. Adequately manages time pressure
	Stress	Knowledge of how stress affects human performance	1. Notices stress factors 2. Adequately manages stress
	Fatigue	Knowledge of how fatigue affects human performance	1. Notices when fatigue starts to affect human performance 2. Adequately manages signs of fatigue
	Psychoactive substances and medicines	Knowledge of 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

AMC1 ORGH.TRG.100(d) Training and assessment programme

ENSURING CONTINUED COMPETENCE BY APPLYING RECURRENT TRAINING AND RECURRENT ASSESSMENT

(a) Recurrent training, conducted no less frequently than every 36 months, should be based on the initial training syllabus. The recurrent training should end with an assessment that acknowledges individuals' continued competence. For certain types of GH activities, recurrent training should

be performed at shorter intervals. Aircraft ground de-icing/anti-icing recurrent training should be performed in accordance with SAE AS6286.

(b) The GH organisation may also apply, when suitable for the size of its operation, recurrent assessment and subsequent retraining as a method of maintaining the competence of its personnel and ensuring that their knowledge and skills remain at the required level. A recurrent assessment is the equivalent of a proficiency check in other aviation regulations.

(1) When applied, the recurrent assessment should check KSAs simultaneously and should be performed at regular intervals, which are relevant to the operational context but shorter than 36 months from the previous training and assessment. A recurrent assessment does not need to cover all the tasks and responsibilities of an individual in one go; however, they should be assessed in their entirety within 36 months of the previous 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. The minimum score to pass a recurrent assessment and achieve competence should be 90 %.

(3) The GH organisation should develop checklists to be used by assessors when performing recurrent assessments. These checklists should be based on the tasks and duties associated with the function assigned to the individual being assessed and should also include or have an associated score sheet.

(4) Subsequent retraining following a recurrent assessment should address areas where the individual performed their tasks below the established level of competence or where their performance was uncertain or below the required standard. Providing subsequent retraining that covers the full initial training syllabus should remain at the discretion of the supervisor and the nominated person responsible for the GH organisation's training.

(c) The GH organisation may apply a combination of points (a) and (b), in which the recurrent assessment is performed at shorter intervals than 36 months, and the recurrent training performed every 36 months is adjusted in length and level of detail compared with the initial training syllabus.

GM1 ORGH.TRG.100(d) Training and assessment programme

TYPES OF TRAINING FOR CONTINUED COMPETENCE

(a) **Recurrent training**

(1) Recurrent training includes training in and assessment of the knowledge and skills that are necessary to perform GH tasks to the required standard.

(2) When the GH organisation applies a recurrent assessment (or proficiency check) to ensure continued competence, 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 level of

competence, and not necessarily to full recurrent training. The results of the recurrent assessment and the subsequent retraining may serve as proof of recurrent training.

(b) **Refresher training** addresses the gaps identified in the individual's ability to perform their tasks to the established standards or provides updates related the latest changes in procedures, standards or regulations. It includes training in and assessment of the knowledge and skills appropriate to the individual's function. It is conducted as follows:

(1) After a pause in the execution of tasks between 3 and 12 consecutive months or upon identifying a lower level of performance in an individual's execution of assigned tasks during a recurrent assessment. Refresher training is followed by an assessment of competence.

(2) An individual undergoes update training when new or changed procedures or processes or amendments to the applicable regulations, which have not yet been included in the recurrent training, are implemented. The purpose is to ensure the continued competence of an individual following 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. The training is developed and delivered following an analysis of the impact of the changes and observing the change management process.

(ii) The update training can be delivered in various formats that include classroom sessions, online training, videos or formally documented briefings for employees.

(iii) Examples of situations in which update training should be provided are following changes to operational procedures or the introduction of a new aircraft type to be serviced, new operating systems or new GSE, or a combination of these.

(3) Update training and on-the-job assessment are conducted in the following cases:

(i) when the individual has previously achieved the competence to perform a certain function but can no longer demonstrate the required competence; or

(ii) when the individual has been absent from their operational role for between 3 and 12 consecutive months.

(c) **Requalification training** is provided after a period of absence of 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 gaps in the individual's performance should be covered. Additionally, update training should be included. Requalification training ends with an assessment of competence to ensure that the individual has achieved the same level of competence as required after initial training.

GM2 ORGH.TRG.100(d) Training and assessment programme

RECURRENT ASSESSMENT

(a) The recurrent assessment programme is used for meeting the following objectives:

(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.

(b) The recurrent assessment is performed during real-time activities (on-the-job performance) and is based on realistic tasks specific to the role.

(c) The individuals being assessed are informed in advance of the date of the assessment and the expected assessment conditions.

(d) The assessment provides anonymous and confidential results and recommendations of corrective measures.

(e) The frequency of the recurrent assessment is driven by safety events, accident/incident reports, errors noticed or reported in the execution of operational procedures, changes to regulations or aircraft operators' manuals and the results of regular, non-punitive competence evaluations.

(f) Recurrent assessment and retraining are documented for recording and inspection purposes.

GM3 ORGH.TRG.100(d) Training and assessment programme

WAYS TO IMPLEMENT RECURRENT ASSESSMENT — CHECKLISTS FOR ASSESSORS

The checklists will be used to assess the performance of individuals during daily operations and will constitute evidence for the completion of recurrent assessments/proficiency checks.

The following is an example of a checklist that may be used by an assessor to perform recurrent assessments (proficiency checks) of individuals for the operation of a conveyor belt loader.

Operational assessment checklist — user guide

- After the assessment, mark each task with ‘pass’ or ‘not yet compliant’ or ‘not checked’.
- If completing this on paper, write down the result manually.
- Afterwards rate each chapter with the criteria from the drop-down menu.
- Add notes/comments in the box below the question.
- An ‘error-free learning’ philosophy is applied. To pass the assessment, a result of 100 % ‘pass’ for all checked tasks is mandatory.
- Fill out the ‘short summary’ with an overall comment or special observation.
- The answers can be found on the last page(s) of this document.

I hereby confirm that this assessment was performed according to the GH organisation’s standards and the result was shared with the employee. In case further actions are needed, they will be initiated.	I hereby confirm that I was assessed according to standard. I was told the result and accept the outcome of this assessment.
Date:	Date:
Signature assessor:	Signature employee:

Qualification checklist	**Employee name:** **Employee number:**			**Examiner:** **Employee number:**
Job title:		**Module**: CBLs – Conveyor belt loaders		**Task:** Safely operate a CBL
Station:	**Short summary:**			**Flight number:**
Date:				**Aircraft type:**

Steps	**Result**	**Details of each step**		
Personal protective equipment	Choose an item.	Show	Choose an item.	Is all PPE according to policies and/or other regulations?
		Tell	Choose an item.	Name 2–3 potential hazards while operating a CBL.
Introduction and before-use visual check	Choose an item.	Show	Choose an item.	Is the before-use visual check performed?
	Choose an item.	Tell	Choose an item.	Name 2–3 items to check for during the visual check before use.
			Choose an item.	What to do in case of observation of any non-conformity.
Driver safety, general driving guidelines, guide person positioning, consequences of insufficient control of CBL	Choose an item.	Show	Choose an item.	Is a guide person used for positioning the CBL?
	Choose an item.	Tell	Choose an item.	What is the circle of safety? What is the distance? Under what circumstances are you allowed to come closer than 3 m?

Chocking requirements, trombones, aircraft hold access/exit, aircraft loading and unloading, caution, operation of a conveyor belt, guard rails, safe exit from aircraft hold, safe removal of CBL from aircraft, unattended CBL and aircraft, safe parking	Choose an item.	Show	Choose an item.	Is a brake stop performed?
			Choose an item.	Is the CBL correctly chocked?
			Choose an item.	Loading: is the belt positioned higher than the hold?
			Choose an item.	Are the guardrails retracted before approaching the aircraft?
			Choose an item.	No person walks on the CBL while it or the belt is running.
			Choose an item.	No person jumps off the CBL.
			Choose an item.	Unloading: is the belt positioned lower than the hold?
			Choose an item.	Is the positioning compliant with the ‘no-touch’ policy?
			Choose an item.	Is the CBL parked according to the policy?
	Choose an item.	Tell	Choose an item.	What is the ‘no-touch’ policy?
			Choose an item.	Why is contact with a rolling belt to be avoided?
			Choose an item.	How big should the gap between the CBL and the aircraft hold be?
			Choose an item.	What actions need to be performed on the aircraft when leaving the aircraft unattended?
			Choose an item.	What actions need to be performed on the CBL when leaving the aircraft unattended?
Regional jet awareness, adverse weather	Choose an item.	Show	Choose an item.	Are cargo and bags covered in case of rain or other bad weather influence?
	Choose an item.	Tell	Choose an item.	What is APDS?

protection, APDS (35–41)				

Note: In the columns containing ‘Choose an item’, the drop-down list contains the following values: ‘Pass’, ‘Not yet compliant’ and ‘Not checked’.

END

ANSWERS

Question/check	Answer(s)
Is all PPE according to policies and/or other regulations?	
Name 2–3 potential hazards while operating a CBL.	Low temperature, moving vehicles, pinch points, lifting, fall from height
Is the before-use visual check performed?	
Name 2–3 items to check for during the visual check before use.	According to checklist
What to do in case of observation of any non-conformity.	Do not use equipment, report non-conformity, attach an out-of-service tag
Is a guide person used for positioning the CBL?	
What is the circle of safety? What is the distance? Under what circumstances are you allowed to come closer than 3 m?	Safety zone around the aircraft to prevent accidents
Is a brake stop performed?	
Is the CBL correctly chocked?	
Loading: is the belt positioned higher than the hold?	
Are the guardrails retracted before approaching the aircraft?	
No person walks on the CBL while it or the belt is running.	
No person jumps off the CBL.	
Unloading: is the belt positioned lower than the hold?	

Is the positioning compliant with the ‘no-touch’ policy?	
Is the CBL parked according to the policy?	
What is the ‘no-touch’ policy?	Never touch the aircraft with equipment, also known as the ‘no-contact rule’.
Why is contact with a rolling belt to be avoided?	Safety hazard for the hand. Hand may be caught.
How big should the gap between the CBL and the aircraft hold be?	10 cm (or 3 inches)
What actions need to be performed on the aircraft when leaving the aircraft unattended?	Doors are closed.
What actions need to be performed on the CBL when leaving the aircraft unattended?	CBL boom is fully lowered and power is off.
Are cargo and bags covered in case of rain or other bad weather influence?	
What is APDS?	A warning system that helps prevent accidents

NB: CBL = conveyor belt loader; PPE = personal protective equipment; APDS = aircraft proximity detection system.

AMC1 ORGH.TRG.100(i) Training and assessment programme

TRAINER AND ASSESSOR TRAINING

(a) The GH organisation should ensure that its training programme includes minimum criteria for the competence and qualification of trainers and assessors.

(b) The trainer and assessor functions may be performed by the same person if that person is qualified for both. However, the assessment should be conducted, whenever possible, by an assessor who was not exclusively involved in training on the same subject and of the same target group, or by a person other than the trainer.

(c) The assessor should be able to provide feedback to the trainee and ensure error-free learning.

(d) The persons performing recurrent assessment and on-the-job trainers should also receive appropriate training for trainers or assessors, depending on the function assigned to them.

AMC2 ORGH.TRG.100(i) Training and assessment programme

TRAINERS — QUALIFICATION AND COMPETENCE

(a) An individual should meet the following criteria to be qualified as a GH trainer:

(1) be qualified and have at least 12 months' recent operational experience in the GH area in which they will deliver training;

(2) have adequate instructional skills, or be qualified as a trainer in line with industry best practices or, in the absence of such qualification, complete a train-the-trainer course;

(3) have a good performance record as a trainer or as a subject matter expert or both, and good interpersonal and communication skills;

(4) demonstrate familiarisation with the operational procedures applied by the GH organisation;

(5) whenever possible given the size of the organisation, deliver a training course under the supervision of a qualified trainer or assessor before receiving their qualification.

(b) Once qualified, the trainer should maintain their qualification and competence as a trainer in accordance with point ORGH.TRG.100(i). The trainer should:

(1) conduct at least one training course every 24 months in the GH area in which they were qualified as trainers;

(2) if more than 24 months have passed since the delivery of the last training, attend refresher and update training before conducting the next course;

(3) complete a recurrent assessment or a refresher training not later than every 36 months in the GH area in which they conduct training.

ON-THE-JOB (OJT) TRAINERS — QUALIFICATION AND COMPETENCE

(c) An individual should meet the following criteria to be qualified as an OJT trainer:

(1) be qualified and have at least 12 months' recent operational experience in the GH area in which they will perform OJT;

(2) have good interpersonal and communication skills;

(3) have completed training for OJT trainer, to ensure that the OJT consolidates the trainee's practical skills and attitude through error-free learning.

(d) Once qualified, the OJT trainer should maintain their qualification and competence in the GH area of their training and as an OJT trainer. The OJT trainer should:

(1) conduct at least one training course every 24 months in the GH area in which they were qualified as OJT trainers;

(2) if more than 24 months have passed since the last OJT, attend refresher and update training before conducting the next OJT;

(3) complete a recurrent assessment or a recurrent training not later than every 36 months in the GH area in which they conduct OJT.

ASSESSORS — QUALIFICATION AND COMPETENCE

(e) An individual should meet the following criteria to be qualified as an assessor:

(1) have at least 12 months' recent operational experience in the area in which they will conduct assessment;

(2) have a good performance record as an assessor and good interpersonal skills;

(3) have completed adequate training on the assessment phase of the training process;

(4) whenever possible given the size of the organisation, conduct an assessment under the supervision of a qualified assessor before receiving their qualification.

(f) Once qualified, the assessor should maintain their qualification and competence as assessors in the GH area in which they conduct assessments. The assessor should:

(1) conduct at least one assessment every 24 months in the GH area in which they were qualified as assessors;

(2) if more than 24 months have passed since the last assessment, attend refresher and update training before conducting the next assessment;

(3) complete a recurrent assessment or a recurrent training not later than every 36 months in the GH area in which they conduct the assessment.

(g) The GH organisation should have procedures for requalifying a trainer, an OJT trainer or an assessor when they do not meet the criteria for their initial qualification or for maintaining their competence.

GM1 ORGH.TRG.100(i) Training and assessment programme

MENTORS

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

A newly trained person may need support to build their experience in live operation. This support may come in many forms, such as from a trainer, an OJT trainer or a coach or mentor. In all cases, the person helping develop the newly qualified person's experience should be trained, qualified and current in the task they are supporting.

Mentors can assist and guide the newly qualified persons on technical matters and on a social (integration) level. A mentor could also contribute to a new employee's development of the desired attitude.

Below is a list of situations in which a mentor could provide support, as well as competencies that are desirable for them to have. The list is for guiding purposes, as one person is not expected to meet all these criteria:

(a) core tasks:

(1) provide technical expertise:

(i) help with developing and maintaining competencies;

(ii) support the learning process;

(iii) promote the safety culture;

(iv) provide feedback;

(v) act as a point of contact;

(2) promote social integration:

(i) share information on the purpose of the organisation;

(ii) communicate existing agreements and point out their importance (safety regulations, breaks, etc.);

(iii) promote equality by building a safe and honest relationship with the trainee;

(iv) guide the trainee in the organisation's network;

(3) guide and motivate (new) employees optimally, in line with the agreed commitments;

(4) maintain their own skills and expertise, as well as their qualifications to perform the operational skills that they mentor in;

(5) apply means developed by the GH organisation for the execution of the mentoring function (by developing or using a checklist, information folder, etc.) in coordination with the safety manager and the supervisor.

(b) competencies:

(1) knowledge:

(i) knowledge and expertise in one's own role;

(ii) knowledge about the structure of the organisation;

(2) skills:

(i) be able to lead by example;

(ii) be able to listen actively;

(iii) be able to motivate;

(iv) be available;

(v) be able to communicate efficiently;

(vi) be able to recognise non-verbal signals;

(vii) be able to provide feedback;

(viii) show respect;

(ix) stimulate autonomy;

(3) attitude:

(i) willing to invest time;

(ii) mature and experienced;

(iii) patient;

(iv) prepared to give trust;

(v) prepared to be co-responsible for someone's development;

(vi) self-confident;

(vii) trustworthy;

(viii) impartial;

(ix) tolerant;

(x) motivated.

AMC1 ORGH.TRG.100(j) Training and assessment programme

EVALUATION OF THE TRAINING PROGRAMME

The GH organisation should develop a process for a continuing evaluation of the training and assessment programme of its GH personnel. The evaluation process 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;

(c) remedial actions are taken if in-training and post-training evaluations indicate evident criteria to do so; and

(d) the evaluation of the programme takes 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 PRMs 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 mobility devices and their batteries and loading them onto the aircraft.

SUBPART GSE — GROUND SUPPORT EQUIPMENT

GM1 ORGH.GSE.100(c) Ground support equipment — General requirements

PROVISION OF EQUIPMENT, FACILITIES OR INSTALLATIONS AND OPERATION OF GSE

(a) When the aerodrome operator **provides** equipment, facilities or installations to be used for the provision of GH services, this does not automatically make it a GH organisation in the sense of Commission Delegated Regulation (EU) 2025/20.

(b) When the aerodrome operator also **operates** such equipment, facilities or installations using its own personnel, it is considered a GH organisation and Commission Delegated Regulation (EU) 2025/20 applies to it unless the aerodrome operator is eligible for an exemption in accordance with Article 2(3) of that Regulation.

(c) The operation of the equipment, facilities or installations usually remains 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) Training on the safe operation of 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 maintenance programme of GSE should be reflected in the safety risk assessment process of the GH organisation. It should incorporate, as applicable, any relevant technical documentation developed for a particular piece of equipment and available from the equipment manufacturer, the aerodrome operator or the aircraft operator.

(b) The maintenance programme should include regular and ad hoc inspections of GSE serviceability and should include both motorised and non-motorised GSE.

(c) 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 is expected to meet existing international manufacturing standards applicable to GSE and vehicles used for aircraft and passenger handling.

(b) ICAO Doc 10121, *Manual on Ground Handling*, contains further guidance in Section 4.5 on human factors.

(c) The EN 12312 standards for GSE may be used.

GM2 ORGH.GSE.105 Ground support equipment maintenance programme

FURTHER GUIDANCE ON HUMAN FACTORS IN THE MAINTENANCE OF GSE

(a) Human conditions that may have a negative impact on the maintenance of GSE include fatigue, failure to comply with operational procedures, complacency and stress.

(b) The maintenance of GSE is usually performed by an entity different from the GH organisation. Further guidance can be found using the following links:

— https://humanfactors101.com/topics/maintenance-error/;

— https://www.faasafety.gov/files/gslac/courses/content/258/1097/AMT_Handbook_Addendum_Human_Factors.pdf.