

ANNEX 1 to NPA 2023-106 DRAFT (EU) Ground Handling Regulation, EASA AMC and GM

ARTICLE 1 Subject matter

This Regulation establishes common requirements to ensure compliance with the essential requirements set out in Regulation (EU) 2018/1139 for the provision of ground handling (GH) services at aerodromes within the scope of Regulation (EU) 2018/1139. This Regulation lays down detailed rules on:

1. the conditions and procedures for organisations providing GH services to declare the provision of such services, as referred to in Article 37(2) of Regulation (EU) 2018/1139, as set out in Annexes III (Part-ORGH) and IV (Part-GH.OPS) to this Regulation;
2. the conditions for the safe provision of GH services that are necessary for an aircraft's arrival and departure;
3. the conditions for organisations providing GH services to discharge their responsibilities for the safe provision of services as set out in Annex III (Part-ORGH) and Annex IV (Part-GH.OPS) to this Regulation;
4. the conditions under which the provision of GH services will be suspended or limited by the competent authority, subject to certain conditions in the interest of safety;
5. the oversight of GH services and organisations providing such services by the competent authority as set out in Annex II (Part-ARGH).

GM1 to Article 1 Subject matter

PROVISION OF GH SERVICES FROM A REMOTE LOCATION

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

Examples of such services:

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

ARTICLE 2

Scope

1. This Regulation shall apply to the following organisations that provide any of the GH services specified in point (2) at one or more aerodromes within the scope of Regulation (EU) 2018/1139, herein called a 'GH organisation':
 - (a) a provider of one or more GH services, operating as a stand-alone organisation or as part of a single ground handling organisation business grouping,
 - (b) an aerodrome operator providing GH services,
 - (c) an aircraft operator providing GH services to itself or within a single air carrier business grouping (self-handling).
2. This Regulation covers the organisational and safety aspects of the following ground handling activities when they are performed at an aerodrome within the scope of Regulation (EU) 2018/1139:
 - (a) Passenger handling, including passengers with reduced mobility, covering the safety of passengers during boarding and disembarkation;
 - (b) Baggage handling covering the preparation of baggage for safe loading in the sorting area;
 - (c) Aircraft handling and turnaround activities covering the following:
 - (i) provision and operation of ground support equipment (GSE) and other vehicles used for ground handling purposes,
 - (ii) aircraft refuelling and defueling, namely into-plane fuelling services and fuel storage at the aerodrome,
 - (iii) aircraft toilet servicing,
 - (iv) potable water servicing,
 - (v) catering loading;
 - (vi) aircraft exterior cleaning,
 - (vii) aircraft de-icing and anti-icing,
 - (viii) activities upon aircraft arrival, including aircraft securing on the ground, accessing doors,
 - (ix) aircraft loading and unloading of baggage, cargo, mail, and loading supervision
 - (x) activities upon aircraft departure,
 - (xi) aircraft towing and pushback;
 - (d) Cargo and mail handling covering the following activities performed at an aerodrome, after cargo acceptance:
 - (i) preparation for the flight,
 - (ii) final build-up and storage, if applicable,
 - (iii) final checks before the flight;
 - (iv) ground transportation of cargo and mail between the cargo terminal and the aircraft.

Activities in points (i), (ii) and (iii) may be performed in a cargo terminal or a cargo warehouse at an aerodrome or adjacent to it.

- (e) Ground supervision.
3. This Regulation shall not apply to the following activities and organisations performing them when these are not cumulated with other GH activities:
- (a) Marshalling of aircraft. This activity shall comply with Regulation (EU) 139/2014.
 - (b) Flight dispatch tasks performed by flight dispatchers as defined by Regulation (EU) No 965/2012. These activities shall comply with Regulation (EU) 965/2012.
 - (c) Load control tasks related to load planning, mass and balance calculations, load control messages and communications, and issuance of load control documents. These activities shall comply with Regulation (EU) 965/2012.
 - (d) Ground supervision performed by aircraft operators as a self-handling activity or within a single air carrier business grouping. These activities shall comply with Regulation (EU) 965/2012.
 - (e) Oil handling for the aircraft (including replenishment, servicing) performed by maintenance organisations approved under Regulation (EU) 1321/2014, other organisations compliant with Regulation (EU) 1321/2014, and other maintenance organisations holding an approval issued in compliance with ICAO Annex 8 Chapter 6.
 - (f) Ground transportation of persons between the aerodrome terminal or other facilities at the aerodrome and the aircraft. These activities shall comply with Regulation (EU) No 139/2014.
4. This Regulation shall also not apply to aircraft operators conducting the following types of operations when they perform self-handling:
- (a) non-commercial operations with complex or other-than-complex motor-powered aircraft (NCC, NCO),
 - (b) specialised operations (SPO), either commercially or non-commercially,
 - (c) operations under a permit-to-fly, and
 - (d) commercial air transport (CAT) operations with other-than-complex motor-powered aircraft.

Those aircraft operators shall perform self-handling in accordance with the relevant requirements of Regulation (EU) 965/2012 on air operations regarding training of personnel and operational procedures.

Rationale:

Point 1: This point identifies the organisations providing GH services to which this Regulation applies. This is intended to cover different business models of GH organisations and of aircraft operators, for efficiency reasons: there are GH organisations registered in every Member State and belonging to the same parent-company. There are also aircraft operators performing self-handling to themselves and also to other aircraft operators that are members of the same business grouping. The proposed rules in Annex II and III applicable to these very specific business models have in mind a pragmatic approach, to enable application of the same operational procedures and training within the same business grouping and also to enable an efficient cooperative oversight.

Points 2 and 3: The proposed list is based on the list of GH services in the Annex to the GH Directive 96/67/EC and the definition of ground handling services in the Basic Regulation. However, every individual service on the GH Directive list was carefully discussed and analysed with the GH Expert group and only the GH services that have a safety component were kept in the scope of the GH Regulation, provided that they are not covered by other applicable regulations. The GH services outside the scope as being covered by other regulations are listed in point 3. The proposed exemptions have been discussed with the expert group and the Air OPS TEB members and found to be adequate for the scope.

Point 4: these operators are proposed to be exempted from the GH Regulation for proportionality reasons, as the safety mitigating elements for safe performance of self-handling are already provided in the Air Operations Regulation, which is already applicable to those aircraft operators.

GM1 Article 2 Scope

GROUND HANDLING ORGANISATION

- (a) The definition of ground handling (GH) organisation is based on the definition of ground handling services included in Regulation (EU) 2018/1139. The GH services today are provided by different types of organisations. When the terms ‘organisation providing GH services’, ‘GHSP’ or ‘GH organisation’ are used in this Regulation, they are understood to cover all organisations identified in Article 2(1) unless it is clearly specified in the rule that it applies only to one or two types of organisation and not to all.
- (b) A GH organisation that is contracted by another GH organisation to perform any GH activity as listed in Article 2(2) is considered a GH organisation and therefore subject to this Regulation.
- (c) A freight forwarder is not a GHSP. Freight forwarding is not included in the definition of ‘ground handling’ of Regulation (EU) 2018/1139. If a freight forwarder provides a GH service, then the safety of its activities will be covered by the provisions of Contracted activities, either under Regulation (EU) 965/2012 (ORO.GEN.205) or under the GH Regulation (ORGH.MGM.205).
- (d) Subsidiary companies of aircraft operators, aerodrome operators, or apron management service providers that provide GH services are treated like stand-alone GH organisations.
- (e) Aircraft servicing, as a sub-category of aircraft handling, means GH activities such as refuelling and defueling operations, de-icing and anti-icing operations, replenishing with potable water, toilet and wastewater services, catering handling, exterior and interior cleaning services, provision and operation of ground support equipment such as air starter unit (ASU), ground power unit (GPU), air conditioning unit (ACU). Not to be confused with aircraft maintenance servicing.

GM1 Article 2(1) Scope

SINGLE GROUND HANDLING ORGANISATION BUSINESS GROUPING

- (a) A ‘**single GH organisation business grouping**’ refers to two or more GH organisations that provide services in more than one Member State and are registered in the territories to which the Treaties apply, which facilitate the harmonisation of their management systems and main organisation processes for the purpose of compliance with this Regulation. This includes applying the same policies, processes and procedures to the components of their management

systems such as the safety management, documentation, compliance monitoring, management of changes, training of GH personnel, operational procedures, and maintenance programme for ground support equipment.

- (b) This concept is used in the GH Regulation for the situations when a GH organisation has several branches that may be registered in more than one Member State, but which belong to the same parent-company. In such cases, it is necessary to distinguish that such organisations should be regarded as part of a single business grouping and should have a single principal place of business – the one where the parent-company is located. The use of this concept serves several purposes:
- (1) to avoid a duplication of GH requirements for the same organisation,
 - (2) to avoid multiple oversight audits and inspections with the same scope – the organisation’s management system – and to enable an effective and efficient cooperative oversight, and
 - (3) to enable such organisations to identify to which competent authority they should submit a declaration.

GM2 Article 2(1) Scope

SINGLE AIR CARRIER BUSINESS GROUPING

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

GM3 Article 2(1) Scope

AIRCRAFT OPERATORS PROVIDING GH SERVICES

- (a) The term ‘aircraft operator’, when used in relation to self-handling, should be understood as an aircraft operator that may or may not be part of a single aircraft operator business group unless specified otherwise.
- (b) A **‘single air carrier business grouping’** refers to two or more aircraft operators (AOC holders) having their principal place of business in the territory to which the Treaties apply, that facilitate the harmonisation of their management systems, operations and other processes for the

purpose of applying the requirements for self-handling. This includes applying common standards to components of their management system addressing ground handling, training of personnel performing GH activities, ground operational procedures, and the maintenance programme for ground support equipment.

- (c) An aircraft operator providing GH services to other aircraft operators that are not part of the same single air carrier business grouping is considered to be a GH organisation as identified in point 1(a) of Article 2.

GM1 Article 2(2) Scope

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

- (a) If the aerodrome operator performs itself GH services to PRM, then it is subject to compliance with the GH Regulation and has to inform the competent authority by submitting a declaration.
- (b) The aerodrome operator only needs to integrate the elements related to PRM services in its already existing management system structures.

GM2 Article 2(2) Scope

GROUND SUPPORT EQUIPMENT (GSE)

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

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

- (18) aircraft start unit (ASU)
- (19) ground power unit (GPU)
- (20) lavatory service equipment
- (21) potable water service equipment
- (c) *Towing equipment, including remote controlled vehicles*
 - (22) tractor for baggage, cargo or aircraft equipment
 - (23) aircraft towing or pushback vehicle: tractor, tug, truck
 - (24) towbar
 - (25) towbarless tractor
- (d) *Transporting equipment*
 - (26) bus (for passengers or crews)
 - (27) car, van, pick-up truck
 - (28) cart, dolly (for baggage, cargo, ULD, aircraft equipment)
 - (29) fuelling truck
 - (30) temperature controlled cargo dolly
 - (31) temperature controlled cargo truck
 - (32) trailer (for baggage, cargo, ULD, aircraft equipment)
 - (33) truck (for baggage, cargo, ULD, aircraft equipment)
 - (34) ULD transporter (to move ULD to/from high loaders)

GM3 Article 2(2) Scope

ACTIVITIES UPON AIRCRAFT DEPARTURE

These activities include:

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

GM4 Article 2(2) Scope

CARGO AND MAIL HANDLING IN A CARGO WAREHOUSE

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

GM5 Article 2(2) Scope

GROUND SUPERVISION

- (a) Ground supervision of GH activities is a service in itself, which may be contracted by an aircraft operator as an individual service. It comprises of activities to supervise/coordinate one or more GH activities, which may be performed by one or more providers of GH services.
- (b) Ground supervision does not include the GH organisation's self-management of its own activities.
- (c) The supervision/coordination agent may act on behalf of multiple aircraft operators to ensure the safe delivery of the services by the ground handling organisation.
- (d) The ground supervision/coordination includes general activities, such as official representation of the contracting aircraft operator(s) in relation to the aerodrome authorities or any other organisations operating at that aerodrome, as well as activities taking place before, during and after turnaround, including:
 - (1) Operational planning
 - (2) Coordination of airside activities
 - (3) Activities related to aircraft arrival, vehicles and GSE operations and parking
 - (4) Passenger and Baggage handling
 - (5) Catering ramp handling
 - (6) Departure activities

- (7) Ramp services, aircraft cleaning, refuelling/defueling operations and toilet/water services
- (8) Marshalling and moving of the aircraft, flight-deck communications
- (9) Safety and Service Performance Monitoring
- (10) Workload Management
- (11) Decision making
- (12) Emergency response
- (13) Accidents, incidents and near misses reporting, investigation methods and prevention

GM1 Article 2(3) Scope

FLIGHT DISPATCH

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

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

'ramp supervision' or 'turnaround coordination' for the function, or 'ground dispatcher', 'ramp supervisor' or 'turnaround coordinator' for the person.

GM2 Article 2(3) Scope

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

- (a) The scope of the GH Regulation does not cover the provision of load planning services, mass and balance calculations, LC messaging and communications, and issuance of related documents. These activities are included in the scope of Regulation (EU) 965/2012 on air operations. When outsourced to a third-party provider, the responsibility for the safety of these services is covered by ORO.GEN.205 'Contracted activities'.
- (b) Similar to the operational control system of the aircraft operator, the load control function is specific to the operator's fleet and operational context. It can be performed by a GH organisation at an aerodrome, as part of the GH service offer available at that aerodrome, or it can be done by the aircraft operator itself, either by its own personnel or outsourced to an external service provider that is not located at an aerodrome.
- (c) To simplify the responsibilities and oversight of all the load control activities, the load control process is classified into two distinct phases:
 - (1) Phase 1: mass and balance (M&B) calculations, load planning, communications and messaging, and issuance of load control (LC) documents (loadsheets, LIR, NOTOC when necessary). These activities can be executed from almost anywhere in the world. This phase includes tasks that require only a computer and an internet connection and can be performed anywhere in the world; and
 - (2) Phase 2: aircraft unloading and loading of cargo, mail, and baggage, and loading supervision, verification against the loading instructions, and communication of any last-minute changes to the loadsheet or the loading instructions/report. This phase takes place at an aerodrome, at the aircraft.
- (d) The aircraft operator is responsible for the compliance of activities included in phase 1, i.e., M&B calculations, load planning, communications and messaging, and issuance of LC documents with the relevant requirements of Regulation (EU) 965/2012. This applies at all times, both when the tasks of phase 1 are performed by the aircraft operator itself (as self-handling) and when they are outsourced as a contracted activity. This phase is verified indirectly by the competent authority of the aircraft operator during the oversight of the aircraft operator.
- (e) The GH organisation is responsible for the activities included in phase 2: unloading and loading of the aircraft and the loading supervision – which take place at an aircraft, at the aerodrome. These activities will be directly overseen by the competent authority of the aerodrome where they are performed.

GM3 Article 2(3) Scope

OIL HANDLING

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

ARTICLE 3 Definitions

For the purpose of this Regulation, the following definitions shall apply:

‘aircraft handling’ means all the ground handling activities and communications occurring on the movement area, including aircraft refuelling and defueling, aircraft de-icing and anti-icing, replenishing with potable water, toilet and wastewater services, catering handling, aircraft cleaning services, provision and operation of ground support equipment, aircraft access, securing of aircraft on the ground, aircraft loading and unloading, aircraft pushback or towing, equipment attachment and removal, operation of vehicles and equipment in the immediate vicinity of the aircraft.

‘aircraft turnaround activities’ means a chain of GH activities associated with the handling of an aircraft, its passengers, baggage, mail and cargo, occurring in a pre-determined time interval between the aircraft arrival and its departure.

‘anti-icing’, in the case of ground procedures, means a procedure that provides protection against the formation of frost or ice and accumulation of snow on treated surfaces of the aircraft for a limited period of time (hold-over time);

‘baggage handling’ means the process consisting of a series of activities related to baggage which include handling baggage in the sorting area, sorting it, preparing it for departure, loading it onto and unloading it from the devices designed to move it from the aircraft to the sorting area and vice versa, as well as transporting baggage from the sorting area to the reclaim area.

‘de-icing’, in the case of ground procedures, means a procedure by which frost, ice, snow or slush is removed from an aircraft in order to provide uncontaminated surfaces. The process can combine de-icing and anti-icing performed in two steps;

‘ground supervision’ means a ground handling service consisting of activities related to the supervision of all GH services to an aircraft operator at an aerodrome. This service may be contracted to a GH organisation or performed by the aircraft operator itself, as self-handling;

‘ground support equipment’ (GSE) means a mobile vehicle, apparatus or piece of equipment, motorised or non-motorised, that is designed, built and used for ground handling services to the aircraft on the movement area at an aerodrome. A list of GSE is provided in Annex III Part-ORGH;

‘into-plane (fuelling) service’ means delivery of fuel to an aircraft;

‘load control’ means a process under the responsibility of the aircraft operator, to ensure that the aircraft is safely and efficiently loaded before each flight;

‘single GH organisation business grouping’ means two or more GH organisations registered in the territories to which the Treaties apply, which facilitate the harmonisation of their management systems and main organisation processes for the purpose of compliance with this Regulation. This includes applying the same policies, processes and procedures to the components of their management systems such as the safety management, documentation, compliance monitoring, management of changes, training of GH personnel, operational procedures, and maintenance programme for ground support equipment.

ARTICLE 4

Oversight

1. Member States shall designate one or more entities as the competent authority within that Member State with the necessary powers and responsibilities for the oversight and enforcement tasks regarding GH organisations operating at the aerodromes within the scope of Regulation (EU) 2018/1139.
2. Member States shall ensure that competent authorities exercise their powers impartially and transparently.
3. If a Member State designates more than one competent authority, the following conditions shall be complied with:
 - (a) The areas of competence of each competent authority shall be defined in terms of responsibilities and geographic limitations; and
 - (b) coordination shall be established between those authorities to ensure effective oversight of all ground handling activities and organisations performing them within their respective remits.
4. Member States shall ensure that the competent authorities have the necessary capabilities and resources to fulfil their responsibilities under this Regulation.
5. Member States shall ensure that the competent authorities’ personnel do not perform oversight activities when there is evidence that this could result directly or indirectly in a conflict of interest, in particular when relating to family or financial interest.

6. The competent authorities shall comply with the authority requirements as set out in Annex II (Part ARGH) to this Regulation.
7. Personnel authorised by the competent authority to carry out oversight tasks shall be empowered to perform at least the following tasks:
 - (a) examine the records, data, procedures and any other material relevant to the execution of the oversight task;
 - (b) take away copies of or extracts from such records, data, procedures and other material; ask for an oral explanation on-site;
 - (c) enter relevant premises, operating sites or other relevant areas and means of transport;
 - (d) perform audits, investigations, tests, exercises, assessments, inspections;
 - (e) take or initiate enforcement measures as appropriate.
8. For the purposes of compliance with Regulation (EU) 2022/1645¹, Member States may designate an independent and autonomous entity to fulfil the assigned role and responsibilities of the competent authority referred to in Article 5 of that Regulation. In that case, coordination measures shall be established between that entity and the competent authority, to ensure effective oversight of all the requirements to be met by the GH organisation.

ARTICLE 5

Entry into force and application

1. This Regulation shall enter into force on the [twentieth] day following that of its publication in the *Official Journal of the European Union*.
2. It shall apply from [3 years from the date of entry into force].
3. Notwithstanding point ARGH.OVS.305, the initial oversight cycle shall be 5 years counted from the date of receiving a declaration. During this cycle, the competent authority shall perform at least one comprehensive oversight to each organisation that has declared the provision of GH services. The competent authority shall take into account the prior operational experience of an organisation when developing its oversight plan.
4. The following points shall apply from [6 years from the date of entry into force]:
 - (a) point ARGH.GEN.125(c),
 - (b) point ARGH.GEN.136,
 - (c) point ARGH.MGM.200(d),
 - (d) point ARGH.MGM.205(e),
 - (e) point ARGH.MGM.211,

¹ [Commission Delegated Regulation \(EU\) 2022/1645](#) of 14 July 2022 laying down rules for the application of Regulation (EU) 2018/1139 of the European Parliament and of the Council, as regards requirements for the management of information security risks with a potential impact on aviation safety for organisations covered by Commission Regulations (EU) No 748/2012 and (EU) No 139/2014 and amending Commission Regulations (EU) No 748/2012 and (EU) No 139/2014.

- (f) point ARGH.OVS.300(e), and
 - (g) point ORGH.MGM.201.
5. Notwithstanding point ORGH.DEC.100, organisations already providing GH services at the date of application of this Regulation shall submit a declaration within an interval agreed with their competent authority but no later than 24 months from the date of application of this Regulation.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Rationale

The transition period proposed for the implementation of the cybersecurity requirements is longer so as to enable taking into account any lessons learned from the implementation of Part-IS in the aviation domains where the cybersecurity regulations become applicable at an earlier date. At the same time, the priority should be on the preparation of implementation of the new GH requirements.

ANNEX I

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

GH.DEF.100 Definitions of terms

For the purpose of this Regulation, the following definitions apply:

‘aircraft hold’ – see ‘cargo compartment’;

‘aircraft loading’ means stowing load or ULDs on board the aircraft in accordance with the loading instructions;

‘aircraft pushback’ means moving an aircraft from a parking position by using a specialised ground support equipment. The operation may involve a towbar. See also ‘towing’.

- (1) nose gear-controlled pushback includes either the towbar method, where the rearward movement and steering of the aircraft are controlled by a vehicle and towbar attached to the nose gear, or the towbarless method, where a vehicle is attached directly to the nose gear.
- (2) main gear-controlled pushback uses a vehicle that grasps the aircraft main gear tires to provide rearward movement, and directional control is provided from the flight deck by using the nose-wheel steering system.

‘aircraft stand’ means a designated area on an apron intended to be used for parking an aircraft;

‘aircraft towing’ means moving an aircraft by means of a specialised ground support equipment that supports or is attached usually to the aircraft’s nose landing gear, sometimes to the main landing gear. The operation may involve a towbar. Depending on the towing vehicle type, the operation may involve direct steering from the cockpit by the pilots. The definition applies both to aircraft in service and out of service. See also ‘aircraft pushback’;

‘audit’ means a systematic, independent and documented process for obtaining evidence and evaluating it objectively to determine the extent to which requirements are complied with. Audits may include inspections;

‘baggage’ means the personal property or other articles of a passenger or crew member carried on a flight; equivalent term: luggage;

‘boarding’ (of passengers) means passengers entering an aircraft; equivalent with ‘embarkation’.

‘cabin baggage’ means baggage in the custody of a passenger or crew member that is intended for carriage in the cabin of an aircraft; equivalent terms: ‘cabin baggage’, ‘carry-on baggage’, ‘hand baggage’, ‘unchecked baggage’;

‘cargo’ or ‘freight’ means goods or property that are carried on an aircraft, other than baggage, mail, company material, and in-flight supplies, which are not consumed or used during flight;

‘cargo compartment’ means the area of an aircraft that may be used for the transport of cargo, and/or baggage. Equivalent terms: cargo hold, cargo area, baggage hold, baggage compartment;

‘checked baggage’ means passenger baggage that has been taken into custody by the aircraft operator, intended for carriage in the cargo compartment(s) of an aircraft, for which a baggage claim check has been issued to the passenger; it includes cabin baggage that has been taken from a passenger and

loaded into the hold (e.g. due to physical size/weight restrictions, lack of cabin stowage space). Equivalent term: 'hold baggage', 'hold luggage', 'registered baggage';

'dangerous goods (DG)' means articles or substances which are capable of posing a risk to health, safety, property or the environment and which are shown in the list of dangerous goods in the Technical Instructions or which are classified according to those Instructions;

'disembarking' (of passengers) means passengers getting off the aircraft upon arrival;

'equipment restraint area (ERA)' means a safety buffer around the aircraft, which must remain free from obstruction and foreign object debris before and after aircraft arrival and departure;

'holdover time (HOT)': the period of time during which an anti-icing fluid provides protection against frozen contamination to the treated aircraft surfaces. It depends among other variables, on the type and intensity of the precipitation, OAT, wind, the particular fluid (or fluid Type) and aircraft design and aircraft configuration during the treatment;

'inspection' means, in the context of compliance monitoring and oversight, an independent and documented conformity evaluation by observation and judgement accompanied, as appropriate, by measurements, testing or gauging, in order to verify compliance with applicable requirements. An inspection may be part of an audit, but may also be conducted outside the normal audit plan; for example, to verify the closure of a particular finding;

'just culture' means a culture in which front-line operators or other persons are not punished for actions, omissions or decisions taken by them that are commensurate with their experience and training, but in which gross negligence, wilful violations and destructive acts are not tolerated;

'loading instruction/report (LIR)' means a load control document issued for the purpose of aircraft loading;

'loadsheets' means a load control document that contains the mass and balance data for a particular flight, including:

- (1) the dry operating mass of the aircraft and load components; and
- (2) the distribution of the load in the aircraft and the CG position;

'mail' means dispatches of correspondence and other items, other than aircraft operator's mail, tendered by and intended for delivery to postal services in accordance with the rules of the Universal Postal Union (UPU);

'movement' means a take-off or a landing of an aircraft;

'organisation providing GH services in more than one Member State' means, for the purpose of this Regulation, a GH organisation or a self-handling aircraft operator that provides services at aerodromes in more than one Member State and is overseen by more than one competent authority. It includes organisations that may or may not be part of a single GH organisation business grouping or of a single air carrier business grouping;

'notification to captain (NOTOC)' means accurate and legible written information provided to the commander or pilot-in-command concerning dangerous goods shipments or other special cargo that is to be carried on board the aircraft;

'passenger boarding bridge' means a telescopic corridor that extends from an airport terminal to an aircraft for the boarding and disembarkation of passengers;

'station' means an aerodrome where a GH organisation provides services;

'Technical Instructions' means ICAO Doc 9824 "Technical Instructions for the Safe Transport of Dangerous Goods by Air";

'turnaround coordination' means a GH function with a safety role, that coordinates the ramp handling activities and ends with the release (dispatch) of a flight upon the completion of the GH services to the aircraft on the apron. Equivalent terms: ground dispatcher; ramp lead agent; loadmaster;

'(aircraft) unit load device (ULD)' means a device for grouping and restraining cargo, mail and baggage for air transport. It is either an aircraft container or a combination of an aircraft pallet and an aircraft pallet net. Aircraft ULD is designed to be directly restrained by the aircraft cargo loading system (CLS).

GM1 GH.DEF.100 Definitions

DEFINITIONS OF TERMS

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

<i>Assessment</i>	In the context of management system performance monitoring, continuous improvement, and oversight, it refers to a planned and documented activity that is performed by competent personnel to evaluate and analyse the achieved level of performance and maturity in relation to the organisation's policy and objectives. Note: an assessment focuses on desirable outcomes and the overall performance, looking at the organisation as a whole. The main objective of the assessment is to identify the strengths and weaknesses to drive continual improvement.
<i>Correction</i>	the action to eliminate a non-compliance
<i>Corrective action</i>	the action to eliminate or mitigate the root cause(s) and prevent the recurrence of existing detected non-compliance, or of any other undesirable condition or situation. Proper determination of the root cause(s) is crucial for defining effective corrective action to prevent reoccurrence.
<i>Near miss</i>	an event in which an occurrence to be mandatorily reported according to Regulation (EU) No 376/2014 was narrowly averted or avoided.
<i>Oversight planning cycle</i>	the time frame within which the areas of the approval and the processes that are identified through a risk assessment should be reviewed by the competent authority by means of audits and inspections.
<i>Oversight programme</i>	the detailed oversight schedule that defines the number of audits and other activities, including the scope and duration of each activity, as well as the details of product audits and locations, as appropriate, to be performed by the competent authority, and to the tentative time frame for performing each activity.

<i>Preventive action</i>	the action to eliminate the cause of potential non-compliance, or any other undesirable potential situation
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GM1 GH.DEF.100 Definitions

LOADING INSTRUCTIONS/REPORT (LIR)

The LIR contains a loading instruction part, completed by the load planner, and a loading report part, completed by the loading supervisor. The loading instruction part contains information about the maximum mass of load items that may be loaded in each cargo compartment and instructions for safe and optimal distribution of items to be loaded in the aircraft cargo compartments. The loading report part contains a confirmation that the aircraft has been loaded according to the instructions and includes any last-minute changes.

ANNEX II

AUTHORITY REQUIREMENTS GROUND HANDLING (PART-ARGH)

SUBPART GEN – GENERAL REQUIREMENTS (GEN)

ARGH.GEN.005 Scope

This Annex establishes requirements for the competent authorities responsible for receiving declarations from GH organisations of their capability and the availability to them of the means to discharge the responsibility for the provision of GH services of and for their oversight.

ARGH.GEN.100 Competent authority

- (a) The competent authority responsible for the oversight of organisations providing ground handling services at an aerodrome subject to Regulation (EU) 2018/1139 and for receiving declarations from those organisations shall be the authority designated by the State where the aerodrome is located.
- (b) Notwithstanding point (a), the competent authority responsible for receiving the declaration from a single ground handling organisation business grouping or a self-handling aircraft operator that has its principal place of business in a Member State and provides ground handling services in more than one Member State shall be the authority designated by the Member State where the organisation has its principal place of business.

That declaration shall be considered to be addressed to all competent authorities concerned if all the following conditions are met:

- (1) it includes information on the ground handling services provided at all the aerodromes subject to Regulation (EU) 2018/1139 in all the Member States where the GH organisation provides services;
 - (2) it reaches out to all the Member States concerned through the Repository of Information; as per Article 74 of Regulation (EU) 2018/1139 and
 - (3) it is valid and recognised in all Member States without further requirements or evaluation, in accordance with Article 67(1) of Regulation (EU) 2018/1139.
- (c) The oversight tasks are identified in point ARGH.OVS.315.
 - (d) The cooperative oversight tasks shall be shared between the competent authorities concerned in accordance with ARGH.OVS.330.

Rationale:

The Basic Regulation links the competent authority oversight and the declaration obligation of a GH organisation to the aerodrome where the GH organisation provides services. The competent authority responsible for the oversight and for receiving the declarations of the GH organisations operating at an aerodrome is the authority of that aerodrome.

Submitting as many declarations as countries of operation is an onerous process for large GH organisations and self-handling aircraft operators that operate at many aerodromes, located in more than one Member States. This means that such an organisation will automatically have to declare 16+ times (if, for example, it operates in 16+ Member States).

The oversight process in such case is equally complex and onerous. Such an organisation must be overseen by as many competent authorities, or even more (considering that some Member States designate more than one competent authority). A more efficient solution had to be found while remaining within the boundaries of the Basic Regulation.

This implementing rule, together with those defining the oversight tasks (ARGH.OVS.315) and the cooperative oversight (ARGH.OVS.330), proposes to establish the legal ground for an efficient implementation of oversight of GH organisations.

The rules propose several solutions based on what the Basic Regulation provides: the recognition and validity of declarations in all Member States (article 67(1), the Repository of Information (Article 74), and the cooperative oversight process.

The recognition and validity of the declarations in all Member States make it possible for GH organisations providing services in more than one Member State to submit only one declaration instead of, for example, 16 or more, if it operates in 16+ Member States, and be recognised in all Member States. The format of the declaration contains details about all the aerodromes in all Member States where a GH organisation provides services. When the declaration is uploaded in the Repository of Information, it automatically reaches out all the competent authorities concerned. It is considered that the GH organisation declares its activities to all the competent authorities of the aerodromes where it provides services.

This approach – of submitting the declaration only once instead of 16+ times, with the declaration containing all the information necessary for all the 16+ Member States – does not contradict the Basic Regulation provisions regarding the enforcement and oversight responsibilities of the competent authorities. Each competent authority of the aerodromes included in the declaration will remain fully responsible for the oversight of that GH organisation in their area of jurisdiction. It only simplifies the process of submitting the declarations.

The sharing of responsibilities among the competent authorities through the cooperative oversight process is meant to streamline the oversight process. The intent is to avoid repetitions in auditing the same elements of an organisation multiple times (16+ times) by all the 16+ competent authorities at all aerodromes. It is with an overwhelming majority of cases that a GH organisation providing services in more States has and applies the same management system, processes, procedures, quality management, training of personnel, etc. For these elements to be overseen over and over again may lead to a counterproductive oversight process, not to say overly expensive for both competent authorities and GH organisations. This is where cooperative oversight has a crucial role in simplifying and rendering the oversight process more efficient, without diminishing the enforcement and oversight responsibilities of any of the competent authorities involved in the process.

AMC1 ARGH.GEN.100 Competent authority

COMPETENT AUTHORITY RESPONSIBLE FOR RECEIVING DECLARATIONS

- (a) The Member State should make publicly available any contact information on the competent authority responsible to receive declarations.

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

ARGH.GEN.115 Oversight documentation

- (a) The competent authority shall provide the relevant legislative acts, standards, rules, technical publications and related documents to its relevant personnel in order to allow them to perform their tasks and to discharge their responsibilities.

GM1 ARGH.GEN.115 Oversight documentation

AVAILABILITY OF DOCUMENTATION

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

ARGH.GEN.120 Means of compliance

- (a) The Agency shall develop acceptable means of compliance (AMC) that may be used to establish compliance with Regulation (EU) 2018/1139 and its delegated and implementing acts.
- (b) Alternative means of compliance may be used to establish compliance with Regulation (EU) 2018/1139 and its delegated and implementing acts.
- (c) The competent authority shall establish a system to consistently evaluate that the alternative means of compliance used by itself or by the GH organisations under its oversight comply with Regulation (EU) 2018/1139 and its delegated and implementing acts. That system shall include procedures to limit, revoke or amend alternative means of compliance if the competent authority finds that these do not comply with Regulation (EU) 2018/1139 and its delegated and implementing acts.
- (d) When the competent authority finds that the alternative means of compliance proposed by a GH organisation are in accordance with the implementing rules, it shall:
- (1) inform the Agency of their content, including copies of the relevant documentation;
 - (2) inform other Member States about alternative means of compliance that were accepted;
 - (3) inform the other GH organisations under its oversight, if relevant.
- (e) If the competent authority itself uses alternative means of compliance to achieve compliance with Regulation (EU) 2018/1139 and its delegated and implementing acts, it shall:

- (1) make them available to the GH organisations under its oversight if those alternative means of compliance are intended for use by GH organisations;
- (2) notify the Agency without undue delay; and
- (3) provide the Agency with:
 - (i) a full description of the alternative means of compliance, including any revision to procedures that may be relevant; and
 - (ii) an assessment demonstrating that compliance with the delegated or implementing acts is achieved.

GM1 ARGH.GEN.120 Means of compliance

USE OF THE SAME ALTERNATIVE MEANS OF COMPLIANCE

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

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

DEMONSTRATION OF COMPLIANCE

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

ARGH.GEN.125 Information to the Agency

- (a) The competent authority shall notify the Agency without undue delay of any significant problems with the implementation of Regulation (EU) 2018/1139 and its delegated and implementing acts within 30 days from the time the competent authority became aware of such problems.
- (b) Without prejudice to Regulation (EU) No 376/2014 and its delegated and implementing acts, the competent authority shall provide the Agency with safety-significant information stemming from the occurrence reports as soon as possible.
- (c) The competent authority of the Member State shall provide the Agency, as soon as possible, with safety-significant information stemming from the information security reports it has received pursuant to point IS.D.OR.230 of the Annex (Part-IS.D.OR) to Delegated Regulation (EU) 2022/1645.

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

EXCHANGE OF SAFETY-SIGNIFICANT INFORMATION WITH THE AGENCY

Each competent authority should appoint a coordinator to act as the contact point for the exchange of safety-significant information between the competent authority and the Agency.

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

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

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

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

RECOMMENDED CONTENT FOR CONCLUSIVE SAFETY ANALYSES

A conclusive safety analysis should contain the following elements:

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

and, as appropriate:

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

ARGH.GEN.135 Immediate reaction to a safety problem

- (a) Without prejudice to Regulation (EU) No 376/2014 and its delegated and implementing acts, the competent authority shall implement a system to collect, analyse and disseminate safety information.
- (b) The Agency shall implement a system to analyse any relevant safety information received and, without undue delay, provide Member States and the Commission with any information, including recommendations or corrective actions to be taken, necessary for them to react in a timely manner to a safety problem involving organisations responsible for the provision of

ground handling services subject to Regulation (EU) 2018/1139 and its delegated and implementing acts.

- (c) Upon receiving the information referred to in (a) and (b), the competent authority shall take adequate measures to address the safety problem.
- (d) The competent authority shall immediately transmit the measures taken in accordance with point (c) to the GH organisation, which shall comply with them under Regulation (EU) 2018/1139 and its delegated and implementing acts. The competent authority shall also notify those measures to the Agency and, when combined action is required, to the other competent authorities concerned.
- (e) If relevant, the measures notified to a GH organisation shall also be notified to the aerodrome operator where the GH services provided are subject to those measures.

AMC1 ARGH.GEN.135 Immediate reaction to a safety problem

INFORMATION TO THE AIRCRAFT OPERATORS CONCERNED

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

ARGH.GEN.136 Immediate reaction to an information security incident or vulnerability with an impact on aviation safety

- (a) The competent authority shall implement a system to appropriately collect, analyse, and disseminate information related to information security incidents and vulnerabilities with a potential impact on aviation safety that are reported by organisations. This shall be done in coordination with any other relevant authorities responsible for information security or cybersecurity within the Member State to increase the coordination and compatibility of reporting schemes.
- (b) The Agency shall implement a system to appropriately analyse any relevant safety-significant information received in accordance with point ARGH.GEN.125(c), and without undue delay provide the Member States and the Commission with any information, including recommendations or corrective actions to be taken, necessary for them to react in a timely manner to an information security incident or vulnerability with a potential impact on aviation safety involving products, equipment, persons or organisations subject to Regulation (EU) 2018/1139 and its delegated and implementing acts.
- (c) Upon receiving the information referred to in points (a) and (b), the competent authority shall take adequate measures to address the potential impact on aviation safety of the information security incident or vulnerability.
- (d) Measures taken in accordance with point (c) shall immediately be notified to all persons or organisations that shall comply with them under Regulation (EU) 2018/1139 and its delegated and implementing acts. The competent authority shall also notify those measures to the Agency and, when combined action is required, the competent authorities of the other Member States concerned.

Rationale

This implementing rule is proposed to be added to align the GH regulation with the other aviation regulations in their compliance with Part-IS. The 2 IS regulations are proposed to be amended accordingly, to include GH in their scope.

However, it still needs to be clarified whether the approvals by the competent authority of various elements of the IS-management system are also to be required for declaring organisations – which is the ground handling case – as there are no approvals from the competent authority required in a declaration regime.

ARGH.GEN.140 Safety reporting and follow-up report

The competent authority shall fulfil its obligation related to reporting of safety-related events in accordance with Regulation (EU) 376/2014 and Regulation (EU) 2018/1139. It shall decide in which cases the GH organisation submitting a report as per ORGH.GEN.160 is expected to provide a follow-up report.

Rationale

This implementing rule is proposed to clarify that it is the competent authority that decides when a follow-up report is necessary as per ORGH.GEN.160.

SUBPART MGM – MANAGEMENT (MGM)

ARGH.MGM.200 Management system

- (a) The competent authority shall establish and maintain a management system, including all the following elements:
- (1) Documented policies and procedures to describe its organisation, means and methods to achieve compliance with Regulation (EU) 2018/1139 and its delegated and implementing acts. The procedures shall be kept up to date and serve as the basic working documents within that competent authority for all related tasks.
 - (2) A sufficient number of personnel, including inspectors, to perform its tasks and discharge its responsibilities. Such personnel shall have the necessary knowledge and experience and shall be qualified to perform the allocated tasks. The inspectors shall receive initial training, which includes on-the-job training, and recurrent training to ensure their continued competence. The competent authority shall have a system to plan the availability of personnel, in order to ensure the proper completion of all tasks.
 - (3) Adequate facilities and office accommodation to perform the allocated tasks.
 - (4) A function to monitor compliance of the management system with the relevant requirements and adequacy of the procedures including the establishment of an internal audit process and a safety risk management process. Compliance monitoring shall include a feedback system of audit findings to the senior management of the competent authority to ensure implementation of corrective actions as necessary.

- (5) A person or group of persons, ultimately responsible to the senior management of the competent authority for the compliance monitoring function.
- (b) The competent authority shall appoint for each field of activity, including management system, one or more persons with the overall responsibility for the management of the relevant task(s).
- (c) In addition to the requirements in point (a), the management system established and maintained by the competent authority shall comply with Annex I (Part-IS.AR) to Regulation (EU) 2023/2032 in order to ensure the proper management of information security risks which may have an impact on aviation safety.

AMC1 ARGH.MGMT.200 Management system

ORGANISATIONAL STRUCTURE

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

GM1 ARGH.MGMT.200 Management system

GENERAL

- (a) It is recommended that the competent authority is organised in such a way that:
 - (1) there is specific and effective management authority in the conduct of all relevant activities;

2 [Commission Implementing Regulation \(EU\) 2023/203](#) of 27 October 2022 laying down rules for the application of Regulation (EU) 2018/1139 of the European Parliament and of the Council, as regards requirements for the management of information security risks with a potential impact on aviation safety for organisations covered by Commission Regulations (EU) No 1321/2014, (EU) No 965/2012, (EU) No 1178/2011, (EU) 2015/340, Commission Implementing Regulations (EU) 2017/373 and (EU) 2021/664, and for competent authorities covered by Commission Regulations (EU) No 748/2012, (EU) No 1321/2014, (EU) No 965/2012, (EU) No 1178/2011, (EU) 2015/340 and (EU) No 139/2014, Commission Implementing Regulations (EU) 2017/373 and (EU) 2021/664 and amending Commission Regulations (EU) No 1178/2011, (EU) No 748/2012, (EU) No 965/2012, (EU) No 139/2014, (EU) No 1321/2014, (EU) 2015/340, and Commission Implementing Regulations (EU) 2017/373 and (EU) 2021/664.

- (2) the functions and processes described in the applicable requirements of Regulation (EU) 2018/1139 and its implementing and delegated acts, AMC and GM may be properly implemented;
 - (3) the competent authority's organisation and operating procedures for the implementation of the applicable requirements of Regulation (EU) 2018/1139 and its implementing and delegated acts are properly documented and applied;
 - (4) all competent authority personnel involved in the related activities are provided with training where necessary;
 - (5) specific and effective provision is made for the communication and interface, as necessary, with the Agency and the competent authorities of other Member States; and
 - (6) all functions related to implementing the applicable requirements are adequately described.
- (b) A general policy on activities related to the applicable requirements of Regulation (EU) 2018/1139 and its implementing and delegated acts should be developed, promoted and implemented by the manager at the highest appropriate level; for example, the manager at the top of the functional area of the competent authority that is responsible for such activities.
- (c) Appropriate steps should be taken to ensure that the policy is known and understood by all personnel involved, and all necessary steps should be taken to implement and maintain the policy.
- (d) The general policy, while also satisfying additional national regulatory responsibilities, should take into account in particular:
- (1) the provisions of Regulation (EU) 2018/1139;
 - (2) the provisions of the applicable implementing and delegated acts and their AMC and GM;
 - (3) the needs of industry; and
 - (4) the needs of the Agency and of the competent authority.
- (e) The policy should define specific objectives for key elements of the organisation and processes for implementing related activities, including the corresponding control procedures and the measurement of the achieved standard.

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

DOCUMENTED POLICIES AND PROCEDURES

- (a) The various elements of the organisation involved with the activities related to Regulation (EU) 2018/1139 and its implementing and delegated acts should be documented in order to establish a reference source for the establishment and maintenance of this organisation.
- (b) The documented policies and procedures should be established in a way that facilitates their use. They should be clearly identified, kept up-to-date and made readily available to all personnel involved in the related activities.
- (c) The documented policies and procedures should cover, as a minimum, the following aspects:
 - (1) policy and objectives;
 - (2) organisational structure;
 - (3) responsibilities and associated authority;

- (4) procedures and processes;
 - (5) internal and external interfaces;
 - (6) internal control procedures;
 - (7) training of personnel;
 - (8) cross-references to associated documents;
 - (9) assistance from other competent authorities or the Agency, where required;
 - (10) ethics, personal conduct and the avoidance of actual or perceived conflicts of interest in the performance of official duties.
- (d) If the information is held in more than one document or series of documents, suitable cross-referencing should be provided, and the referenced documentation should be readily available upon request.

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

DOCUMENTED POLICIES AND PROCEDURES

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

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

CONTENT OF PROCEDURES

- (a) The procedures in the competent authority's management system should provide at least the following information:
- (1) regarding continuing oversight functions undertaken by the competent authority, the competent authority's organisational structure with description of the main processes. This information should demonstrate the allocation of responsibilities within the competent authority, and that the competent authority is capable of carrying out the full range of tasks regarding the size and complexity of the Member State's ground handling industry. It should also consider overall proficiency and authorisation scope of competent authority personnel;
 - (2) changes which significantly affect the competent authority's oversight capabilities;
 - (3) for personnel involved in oversight activities, the minimum professional qualification requirements and experience, and principles guiding appointment (e.g., assessment);
 - (4) how the following activities are carried out: verification of declarations, performance of continuing oversight, follow-up of findings and observations, enforcement measures, and resolution of safety concerns;
 - (5) principles of managing exemptions and derogations;
 - (6) systems used to disseminate applicable safety information for timely reaction to a safety problem;

- (7) criteria for planning continuing oversight (oversight programme), including adequate management of interfaces when conducting continuing oversight (aerodrome operations and air operations, or ramp inspections); and
 - (8) outline of the initial training of newly recruited oversight personnel (taking future activities into account), and the basic framework for continuation training of oversight personnel.
- (b) The procedures in the competent authority's management system should include any amendments to those procedures.

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

PREREQUISITES FOR GH INSPECTORS

- (a) The persons appointed as GH inspectors, having tasks related to oversight of GH organisations, should have operational experience in GH operations or in GH training, appropriate to the assigned tasks, for a minimum number of years as established by the competent authority.

TRAINING AND PROVISION OF TRAINING

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

Rationale:

Training and maintaining of personnel competences have been identified as a critical issue in other aviation domains, including for competent authorities' personnel. Ensuring that the competent authority has competent GH inspectors is a challenging task that requires a carefully developed training process integrated within the management system of the competent authority.

AMC2 ARGH.MGMT.200(a)(2) Management system**INITIAL TRAINING FOR COMPETENT AUTHORITY INSPECTORS**

- (a) Initial training should cover the knowledge, skills and attitude (KSA) components as follows:
- (1) The knowledge component should cover the content of AMC3 ARGH.MGMT.200(a)(2).
 - (2) The skills component should cover audit/inspection techniques and specific areas of attention.
 - (3) The attitude component should be guided throughout the training process, by monitoring the trainee's behaviour and attitude during the assigned tasks and practical exercises and by adjusting the behaviour through discussions and feedback of the instructor throughout the training process.
- (b) The competent authority should ensure that the trainees have successfully completed the first phase of the initial training by passing an assessment with an appropriately qualified person.
- (c) On-the-job training
- After having successfully passed the first phase of the initial KSA training, the trainee should undergo the on-the-job training component of the initial training. The objectives are the following:
- (1) to familiarise the trainee with the particularities of performing a GH audit/inspection in a real, operational environment. It should be done in accordance with AMC4 ARGH.MGM.200(a)(2); and
 - (2) to monitor the knowledge, skills and attitude components in real-life environment and provide final feedback and guidance.
- (d) The competent authority may adapt the duration and depth of the individual training programme of an inspector if the required competencies are achieved and maintained.
- (e) The completion of the two phases of initial training should be documented.

Rationale

This AMC is intentionally kept generic, to highlight the structure of the initial training. The purpose of the initial training with this proposed structure is to indicate means to develop competencies and qualification of a GH inspector. The content of this training will have to be ensured by the competent authority. It is not expected that this is a prerequisite for a GH inspector. The training content on the GH domain is addressed in the next AMC.

EASA will work together with the GH Network of Competent Authority Focal Points to develop a CBTA programme for inspectors, which will be implemented first outside the regulatory framework, then included in the rules after a testing period. This approach would be similar to the CBTA programme for dangerous goods. In anticipation of this work, the three main components that are inherent in any

training have already been introduced here: knowledge, skills and attitude (or the equivalent of the more traditional 'theoretical' and 'practical' training).

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

PRACTICAL TRAINING VS ON-THE-JOB TRAINING

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

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

CONTENT OF THE INITIAL TRAINING FOR COMPETENT AUTHORITY INSPECTORS

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

- (2) dangerous goods;
 - (3) operation of GSE, as applicable;
 - (4) security;
 - (5) other suitable technical training appropriate to the role and tasks of the inspector, including familiarisation with the applicable industry standards.
- (e) *SMS TRAINING*
- Areas of particular interest that include, but are not limited to:
- (1) management systems,
 - (2) assessment of the effectiveness of the safety management system, in particular hazard identification and risk assessment, safety assurance principles, root cause analysis;
 - (3) non-punitive reporting techniques in the context of the implementation of a 'just culture';
- (f) *AERODROME TRAINING*
- (1) unescorted access to the movement area and other operational areas of the aerodrome that are relevant for the oversight of ground handling activities, in accordance with the training for competent authority inspectors included in Regulation (EU) 139/2014;
- (g) The training programme should be updated, as needed, to reflect the latest changes in aviation legislation and industry.

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

DOCUMENTS RELEVANT FOR GH INSPECTOR TRAINING

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

ICAO documentation:

- (1) Annex 6 Operation of Aircraft – relevant SARPs for GH
- (2) Annex 14 Aerodromes – relevant SARPs for GH
- (3) Annex 18 The Safe Transport of Dangerous Goods by Air
- (4) Annex 19 Safety Management
- (5) Doc 10121 Manual on Ground Handling
- (6) Doc 9284 Technical Instructions for the Safe Transport of Dangerous Goods
- (7) Doc 9640 Manual of Aircraft Ground De-icing/Anti-icing Operations
- (8) Doc 9977 Manual on Civil Aviation Jet Fuel Supply
- (9) Doc 10070 Manual on the Competencies of Civil Aviation Safety Inspectors
- (10) Doc 10102 Guidance for Safe Operations Involving Aeroplane Cargo Compartments
- (11) Doc 10147 Guidance on a Competency-based Approach to Dangerous Goods Training and Assessment
- (12) Doc 10151 Manual on Human Performance for Regulators

Industry standards and best practices:

- (13) Joint Inspection Group (JIG) standards related to fueling operations
- (14) Society of Automotive Engineers (SAE) standards related to de-icing and anti-icing operations
- (15) IATA Ground Operations Manual (IGOM), Airport Handling Manual (AHM), Cargo Handling Manual (ICHM)
- (15) EN standards for ground support equipment (EN 12312-1 to 20 and EN 1915-1 to 4)
- (16) IBAC IS-BAH standards for ground handling for business aviation operations

AMC4 ARGH.MGMT.200(a)(2) Management system**ON-THE-JOB TRAINING FOR INSPECTOR QUALIFICATION**

- (a) The competent authority should ensure that the on-the-job training is undertaken by trainees as part of their initial training, after they have successfully completed the first phase of the initial KSA training. On-the-job training should be conducted with a competent person.
- (b) The content and duration of the on-the-job training should be adapted to the particular training needs of every trainee and should take into account the following aspects:
 - (1) the scope and complexity of the inspector's tasks,
 - (2) the application of the KSA concepts developed in the first phase of the initial training,
 - (3) any prior experience as an inspector.
- (c) The on-the-job training should focus on the oversight tasks that the inspector will perform. It should include a number of GH audits/inspections, which the competent authority may decide on a case-by-case basis, based on an evaluation of the trainee's performance.
- (d) The competent authority should confirm that the required competence has been achieved before an inspector is authorised to perform their role without supervision.
- (e) The scope and elements to be covered during the on-the-job training:
 - (1) Preparation of an audit/inspection:
 - (i) sources of information for the preparation of an audit/inspection;
 - (ii) areas of concern and/or open findings;
 - (iii) selection of GH organisation to be audited/inspected; and
 - (iv) task allocation among the members of the audit/inspection team.
 - (2) Administrative issues of the inspection:
 - (i) GH inspector credentials, rights and obligations;
 - (ii) safety and security airside procedures; and
 - (iii) briefing on the GH inspector toolkit (fluorescent vest, checklists, digital camera, torch, safety shoes, hearing protection, etc.)
 - (3) Audit/inspection:
 - (i) introduction – opening meeting;

- (ii) on-site activities (audit/inspection according to the area of expertise);
 - (iii) findings (identification, categorisation, evidencing, reporting); and
 - (iv) corrective actions — enforcement.
- (4) Closing meeting – debriefing on the audit/inspection conclusions.
 - (5) Preparation, completion and delivery of the audit/inspection report.
 - (6) Human factor elements:
 - (i) cultural aspects;
 - (ii) resolution of disagreements and conflicts; and
 - (iii) auditee stress.
 - (7) Team leading, if required.
 - (8) Post-audit/inspection procedures, such as monitoring the status of open audit findings, follow-up audits/inspections, and closing the findings after appropriate action has been taken by the GH organisation.

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

QUALIFICATION OF INSPECTORS AFTER SUCCESSFUL COMPLETION OF INITIAL TRAINING

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

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

QUALIFICATION OF PERSONNEL

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

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

CONTINUED COMPETENCE OF INSPECTORS

- (a) Once an inspector is qualified, the competent authority should ensure that they remain competent to perform the allocated tasks. This should be done by developing and implementing a recurrent training and assessment process. The recurrent training and assessment should take place at regular intervals, no longer than 36 months.
- (b) The training programme should address, as appropriate to their role, at least the following aspects:
 - (2) changes in aviation legislation, operational environment and technologies;
 - (3) competent authority procedures relevant to the inspector's tasks;
 - (4) technical training, including training on ground handling specific subjects, appropriate to the role and tasks of the inspector; and
 - (5) results from past oversight.
- (c) The training courses that have a fixed interval for recurrence established through another regulation should be maintained as such (e.g., dangerous goods training).
- (d) The maintenance of inspector's competence programme should include, whenever possible, a scheme that allows exchange of inspectors between Member States to enable the efficient implementation of cooperative oversight and build on the standardisation of the oversight process while increasing the required competencies.

Rationale:

This AMC considers the feedback from the standardisation activities in the aerodrome domain that the lack of indication of a maximum interval for the recurrent training is a standardisation issue and creates a level playing field among the Member States.

Having flexible intervals for the recurrent assessment makes it possible to fully integrate the trainings with other domains, such as flight operations or aerodrome sections, which can be convenient for competent authorities that prefer their inspectors be competent in more than one domain.

Point (d) has a double purpose: on the one hand, it is an ideal tool for exchanging experience and opinions about the correct interpretation and implementation of the rules and thus helping in the understanding of a different perspective, awareness of the operational context, cultural differences and deepening the human factor competencies of an inspector. On the other hand, this point contributes to a significant degree to the improvement of standardisation of the oversight process, by developing a basis of open and continued communication which further leads to mutual trust and support between competent authorities to develop a good cooperative oversight.

In adult learning literature, this training through exchange of experience is termed "standardisation and moderation" where, for example, two inspectors inspect the same thing and review their outcomes to compare if they are aligned and debate so the observations become interpreted in a standard manner. The "moderation" comes from a level above in the competent authority, where submitted reports are reviewed to check if similar findings or observations are categorised in the same way.

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

CONTINUED ASSESSMENT OF AN INSPECTOR'S COMPETENCE

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

- (a) The continued assessment should consist of a short knowledge check followed by the inspector's performance during a real-time inspection or audit.
- (b) The inspector's performance is evaluated against the objectives (usually the tasks associated to their job description) established for their role.
- (c) Deficiency against the expected outcome will be addressed during a recurrent training session, to maintain the competence of the inspector at the expected level.
- (d) It is recommended to conduct this assessment at intervals not longer than 36 months and to keep evidence of such assessment in the form of a checklist that contains the objectives referred to in point (b).

Rationale:

Difference from the previous version published in 2022: continued assessment is moved at GM level.

The concept of a "continued assessment of competence" is introduced as a more efficient means to maintain an inspector's competence rather than applying an arbitrary recurrent training scheme at a defined period. The arguments in favour of this new method are the following:

- *Continued assessment should verify if the inspector's performance during a real-life inspection or audit is kept at the established level of performance defined in their job description tasks (objectives).*
- *If an inspector is performing at the required level, then they should not be required to undergo training unless something has changed, in which case an ad-hoc training according to changes should be sufficient and less burdensome. If, on the other hand, an inspector is not performing to the required level, then this should be addressed at the time, after the inspection, with a suitable retraining to correct and close any identified gap and ensure that the inspector is back at the expected performance level.*
- *This principle allows for risk-based approach as if a competent authority identifies a trend of findings, or even a lack of expected findings, a tool to assess the inspector(s) performance.*

Once this process is evidenced against a simple checklist of the inspector's tasks and an established level of performance, this can be used as proof of training for continued competence.

It can be expected that if the continued assessment of competence works as intended, then the scope of a recurrent training can be reduced only to regulatory updates, changes in technologies or practices.

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

RECENT EXPERIENCE TO MAINTAIN QUALIFICATION OF GROUND HANDLING INSPECTORS

- (a) A GH inspector should be considered to remain qualified if they perform minimum 2 on-site GH audits/inspections or if they assist other competent authorities in performing minimum 2 GH audits/inspections during the previous 12 months.

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

Rationale:

Difference from the previous version published in 2022: this text has been moved from AMC to GM level.

An additional possibility was added in point (a) following the comments received on the previous version.

It has also been recommended to add the possibility for inspectors to be involved in the performance of GH activities themselves in order to maintain their qualification. This is based on feedback from Industry, who noticed that the best auditors are those that are still active in GH operational functions and that performing only auditor functions are not sufficient to maintain their qualification.

Stakeholders are invited to suggest ways in which this could be implemented, considering that any potential conflict of interest would have to be addressed in advance.

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

SUFFICIENT PERSONNEL

- (a) This GM for the determination of the required personnel refers to the competent authority personnel required to fulfil the oversight and enforcement responsibilities.
- (b) The elements to be considered when determining the necessary personnel and planning their availability can be divided into quantitative and qualitative elements:
 - (1) Quantitative elements:
 - (i) the number of organisations responsible for the provision of ground handling services having declared their activity to the competent authority; and
 - (ii) the number of planned audits and inspections.
 - (2) Qualitative elements:
 - (i) the size, nature and complexity of activities of the organisations responsible for the provision of ground handling services, taking into account:
 - (A) use of industry standards;
 - (B) number of aerodromes where the GH organisation operates;

- (C) number of personnel; and
 - (D) organisational structure, existence of subsidiaries and number of contracted activities;
 - (ii) the safety priorities identified;
 - (iii) the results of past oversight activities, including audits, inspections and reviews, in terms of risks and regulatory compliance, taking into account:
 - (A) number and level of findings;
 - (B) timeframe for implementation of corrective actions; and
 - (C) maturity of management systems implemented by organisations and their ability to effectively manage safety risks, taking into account also information provided by other competent authorities related to activities in the territory of the Member States concerned; and
 - (iv) the size and complexity of the Member State's aviation industry and the potential growth of activities in the field of civil aviation, which may be an indication of the number of new declarations and changes to existing declarations to be expected.
- (c) The following data should be determined to assess the required number of GH inspectors and their planning:
 - (1) standard number of audits to be performed to complete the full oversight scope;
 - (2) standard duration of an audit;
 - (3) standard working time for audit/inspection preparation, on-site audit, reporting and follow-up, per inspector;
 - (4) standard number of inspections and unannounced inspections to be performed;
 - (5) standard duration of inspections, including preparation, reporting and follow-up, per inspector;
 - (6) minimum number of inspectors and required qualification for each audit/inspection.
- (d) Standard working time could be expressed either in working hours per inspector or in working days per inspector. All planning calculations should then be based on the same unit (hours or working days).
- (e) It is recommended to use a spreadsheet application to process data defined under (c) and (d), to assist in determining the total number of working hours/days per oversight planning cycle required for oversight and enforcement activities. This application could also serve as a basis for implementing a system for planning the availability of personnel.
- (f) The following activities can be used to determine the number of working/hours/days per planning period for each qualified inspector:
 - (1) purely administrative tasks not directly related to oversight;
 - (2) training;
 - (3) participation in other projects;
 - (4) planned absence; and
 - (5) include a reserve for unplanned tasks or unforeseeable events.

- (g) The possible use of qualified entities could also be considered in fulfilling the responsibilities of oversight and enforcement.
- (h) Based on the elements listed above, the competent authority should be able to:
 - (1) monitor dates when audits and inspections are due and when they have been carried out;
 - (2) implement a system to plan the availability of personnel; and
 - (3) identify possible gaps between the number and qualification of personnel and the required volume of oversight activities.

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

FACILITIES AND OFFICE ACCOMODATION

Facilities and office accommodation include but are not limited to:

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

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

COMPLIANCE MONITORING PROCESS

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

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

AMC1 ARGH.MGMT.200(c) Management system

PROCEDURES AVAILABLE TO THE AGENCY

- (a) Copies of the procedures related to the competent authority's management system and their amendments to be made available to the Agency for the purpose of standardisation before an inspection should provide at least the following information:
 - (1) Regarding continuing oversight functions undertaken by the competent authority, the competent authority's organisational structure with description of the main processes. This information should demonstrate the allocation of responsibilities within the competent authority, and that the competent authority is capable of carrying out the full range of tasks regarding the size and complexity of the Member State's aviation industry. It should also consider overall proficiency and authorisation scope of competent authority personnel.

- (2) For personnel involved in oversight activities, the minimum professional qualification requirements and experience and principles guiding appointment (e.g., assessment).
 - (3) How the following are carried out: performance of continuing oversight, follow-up of findings, enforcement measures and resolution of safety concerns.
 - (4) Principles of managing exemptions and derogations.
 - (5) Processes in place to disseminate applicable safety information for timely reaction to a safety problem.
 - (6) Criteria for planning continuing oversight (oversight programme), including adequate management of interfaces when conducting continuing oversight (air operations, aerodrome operations, ramp inspections for example).
 - (7) Outline of the initial training of newly recruited oversight personnel (taking future activities into account), and the basic framework for continuation training of oversight personnel.
- (b) As part of the continuous monitoring of a competent authority, the Agency may request details of the working methods used, in addition to the copy of the procedures of the competent authority's management system (and amendments). These additional details are the procedures and related guidance material describing working methods for competent authority personnel conducting oversight.
- (c) Information related to the competent authority's management system may be submitted in electronic format.

ARGH.MGM.205 Allocation of tasks

- (a) The competent authority may allocate to qualified entities tasks related to the registration of declarations or continuing oversight of GH organisations subject to Regulation (EU) 2018/1139 and its delegated and implementing acts.
- (b) When allocating tasks to a qualified entity, the competent authority shall ensure that:
- (1) it has a system in place to initially and continually assess that the qualified entity complies with Annex VI to Regulation (EU) 2018/1139;
 - (2) this system and the results of the assessments are documented;
 - (3) it has established a documented agreement with the qualified entity, approved by both parties at the appropriate management level, which clearly defines:
 - (i) the tasks to be performed;
 - (ii) the declarations, reports and records to be provided;
 - (iii) the technical conditions to be met in performing such tasks;
 - (iv) the related liability coverage; and
 - (v) the protection given to information acquired in carrying out such tasks.
- (c) The competent authority shall establish procedures to ensure that all the information related to the submission of a declaration by a GH organisation is promptly communicated between the competent authority and the qualified entity.

- (d) The competent authority shall ensure that the internal audit process and safety risk management process required in point (a)(4) of ARGH.MGM.200 cover all tasks related to the acceptance of declarations or continuing oversight tasks performed on its behalf.
- (e) For the oversight of the GH organisation's compliance with point ORGH.MGM.201, the competent authority may allocate tasks to qualified entities in accordance with point (a) or to any relevant authority responsible for information security or cybersecurity within the Member State. When allocating tasks, the competent authority shall ensure that:
 - (1) all aspects related to aviation safety are coordinated and taken into account by the qualified entity or relevant authority;
 - (2) the results of the oversight activities performed by the qualified entity or relevant authority are integrated in the overall oversight files of the GH organisation;
 - (3) its own information security management system established in accordance with point ARGH.MGM.200(d) covers all the continuing oversight tasks performed on its behalf.

ARGH.MGM.210 Changes to the management system

- (1) The competent authority shall have a system in place to identify changes that affect its capability to perform its tasks and discharge its responsibilities as defined in Regulation (EU) 2018/1139 and its delegated and implementing acts. The system shall enable it to take action, as appropriate, to ensure that its management system remains adequate and effective.
- (2) The competent authority shall update its management system to reflect any changes to Regulation (EU) 2018/1139 and its delegated and implementing acts in a timely manner, so as to ensure effective implementation.
- (3) The competent authority shall notify the Agency of changes affecting its capability to perform its tasks and discharge its responsibilities as defined in Regulation (EU) 2018/1139 and its delegated and implementing acts.

ARGH.MGM.211 Changes to the information security management system of a GH organisation

- (a) For changes managed and notified to the competent authority in accordance with the procedure set out in point IS.D.OR.255(a) of the Annex (Part-IS.D.OR) to Delegated Regulation (EU) 2022/1645, the competent authority shall include the review of such changes in its continuing oversight in accordance with the principles laid down in point ARGH.OVS.300. If any non-compliance is found, the competent authority shall notify the organisation thereof, request further changes and act in accordance with point ARGH.OVS.320.
- (b) For other changes requiring an application for approval in accordance with point IS.D.OR.255(b) of the Annex (Part-IS.D.OR) to Delegated Regulation (EU) 2022/1645:
 - (1) upon receiving the application for the change, the competent authority shall check the organisation's compliance with the applicable requirements before issuing the approval;
 - (2) the competent authority shall establish the conditions under which the organisation may operate during the implementation of the change;
 - (3) if it is satisfied that the organisation complies with the applicable requirements, the competent authority shall approve the change.

Rationale:

This implementing rule is proposed to be added to align the information security requirements in all domains.

Adequate amendments are proposed in parallel to Regulation (EU) 2022/1345, to create the legal bridge between the two domains (GH and Part-IS) with their applicable requirements.

However, it is not clear how any approval by the competent authority is expected to be implemented by declaring organisations, which exercise their responsibility without any prior approval.

It is not clear whether the approval of various elements of IS-management (e.g., changes to the I-SMS, changes to the I-SMS manual) in a declaration regime was the intention of the Regulator.

Further input may be necessary from the Part-IS experts.

ARGH.MGM.220 Record keeping

- (a) The competent authority shall establish a system of record keeping that ensures adequate storage, accessibility and reliable traceability of:
 - (1) the management system's documented policies and procedures;
 - (2) training, qualification and authorisation of its personnel;
 - (3) the allocation of tasks to qualified entities, covering the elements required by ARGH.MGM.010 as well as the details of tasks allocated;
 - (4) declaration process and continuing oversight of organisations responsible for the provision of ground handling services;
 - (5) the evaluation and notification to the Agency of alternative means of compliance proposed by organisations responsible for the provision of GH services and the assessment of alternative means of compliance used by the competent authority itself;
 - (6) findings, corrective actions and date of action closure, and observations;
 - (7) enforcement measures taken;
 - (8) safety information and follow-up measures; and
 - (9) the use of flexibility provisions in accordance with Article 71 of Regulation (EU) 2018/1139.
- (b) The competent authority shall maintain a list of all declarations it has received.
- (c) Records related to points (a) and (b) shall be kept for a minimum period of five years, subject to applicable data protection law.

AMC1 GH.MGMT.220(a) Record keeping

GENERAL

- (a) The record-keeping system should ensure that all records are accessible whenever needed within a reasonable time. These records should be organised in a way that ensures traceability and retrievability throughout the required retention period.

- (b) Records should be kept in paper form or in electronic format or a combination of both media. Records stored on microfilm or optical disc form are also acceptable. The records should remain legible and accessible throughout the required retention period. The retention period starts when the record has been created, or last amended.
- (c) Paper systems should use robust material, which can withstand normal handling and filing. Computer systems should have at least one backup system, which should be updated within 24 hours of any new entry. Computer systems should include safeguards against unauthorised alteration of data.
- (d) All computer hardware used to ensure data backup should be stored in a different location from that containing the working data and in an environment that ensures they remain in good condition. When hardware or software changes take place, special care should be taken that all necessary data continue to be accessible at least through the full period specified in the relevant Subpart or by default in GH.MGMT.020(d).

AMC1 GH.MGMT.220(a)(1);(2);(3) Record keeping

COMPETENT AUTHORITY MANAGEMENT SYSTEM

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

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

AMC1 GH.MGMT.220(a)(4) Record keeping

ORGANISATIONS

Records related to a GH organisation, should include:

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

SUBPART OVS – OVERSIGHT AND ENFORCEMENT (OVS)**ARGH.OVS.300 Oversight**

- (a) The competent authority shall verify:
 - (1) continued compliance of the GH organisation with the applicable requirements; and
 - (2) implementation of appropriate safety measures mandated by the competent authority in accordance with ARGH.GEN.135.
- (b) The oversight shall:
 - (1) be supported by documentation intended to provide guidance for the competent authority personnel to perform their functions;
 - (2) provide the GH organisation concerned with the results of the oversight;
 - (3) comprise of audits and inspections, including unannounced inspections, when appropriate; and
 - (4) provide the competent authority with the evidence needed if further action is required, including the measures foreseen by ARGH.OVS.325.
- (c) The oversight scope shall consider the results of past oversight activities and the safety priorities.
- (d) The competent authority shall collect and process any information deemed useful for oversight and risk-based oversight, including for unannounced inspections, as appropriate.
- (e) When more than one competent authority is responsible for the oversight of the same organisation, the oversight shall be conducted in accordance with point ARGH.OVS.330.
- (f) For the oversight of the organisation's compliance with point ORGH.MGM.201, in addition to complying with points (a) to (d), the competent authority shall review any approval granted under point IS.D.OR.200(e) of Delegated Regulation (EU) 2022/1645 following the applicable oversight audit cycle and whenever changes are implemented in the scope of work of the organisation.

Rationale on point (f):

As already mentioned in the Rationale to ARGH.MGM.210A, point (f) is proposed to be added to align the information security requirements in all domains.

Adequate amendments are proposed in parallel to Part-IS regulations, to create the legal bridge between the two domains (GH and Part-IS) with their applicable regulations.

However, it is not clear how any approval by the competent authority is expected to be implemented by declaring organisations, which exercise their responsibility without any prior approval.

It is not clear whether the approval of various elements of IS-management in a declaration regime was the intention of the Regulator or whether this aspect was not properly analysed.

Further input may be necessary from the Part-IS experts.

GM1 ARGH.OVS.300 Oversight

GENERAL

- (a) The responsibility for the safe conduct of ground handling services lies with the GH organisation. The declaration regime is a recognition that the GH organisation is the first to hold responsibility for monitoring the safety of its operation. The objective cannot be attained unless the organisation is prepared to accept the implications of this policy, including that of committing the necessary resources to its implementation. The content of Part-ORGH is crucial to the success of the policy, as it requires that the GH organisation establish a management system.
- (b) The competent authority assesses the organisation's compliance with the applicable requirements, including the effectiveness of the organisation's management system, on a continuing basis. If the management system is assessed to have failed in its effectiveness, then this in itself is a breach of the requirements which may, among others, call into question the validity of the declaration.
- (c) The accountable manager is accountable to the competent authority as well as to those who may appoint them. Therefore, the competent authority cannot accept a situation in which the accountable manager is denied sufficient funds, manpower or influence to rectify deficiencies identified in the management system.
- (d) Oversight of the organisation includes a review and assessment of the qualifications of the nominated persons.

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

EVALUATION OF A GH ORGANISATION'S SAFETY RISK MANAGEMENT

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

AMC1 ARGH.OVS.300(d) Oversight

INDUSTRY AUDITS FOR OVERSIGHT PURPOSE

- (a) As part of data collected to support its oversight and develop the basis for a risk-based oversight, the competent authority may take into account the results of audits conducted by industry auditors on the GH organisation.
- (b) The competent authority may credit such audits conducted by a third-party industry auditor if those industry audits meet the following criteria:
 - (1) the scope of such audits can easily be mapped against the scope of oversight in accordance with Annex III (Part-ORGH) and Annex IV (Part GH-OPS), as applicable;
 - (2) the audit content is fit for purpose, objective, the audit process is systematic, the auditors have no conflict of interest and are properly trained;
 - (3) audit results are accessible to the competent authority and the relevant safety information from those results can be shared with the competent authorities responsible for the oversight of that organisation, in accordance with Article 62(9) of Regulation (EU) 2018/1139;
 - (4) the competent authority has access to the third-party industry auditor to determine continued compliance with the applicable requirements.
- (c) It should be understood that the third-party industry audits are not a replacement of the oversight activities of the competent authority. The competent authority remains responsible for oversight at all times.
- (d) Conformity of a GH organisation with industry standards or goods practice proven through a third-party industry audit is not an automatic recognition of compliance with this Regulation.

GM1 ARGH.OVS.300(d) Oversight

INDUSTRY AUDITS IN THE SCOPE OF AMC1 ARGH.OVS.300(d)

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

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

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

ARGH.OVS.305 Oversight programme

- (a) The competent authority shall establish and maintain an oversight programme covering the oversight activities required by ARGH.OVS.300.
- (b) The oversight programme shall be developed and implemented taking into account the following elements, as applicable:
 - (1) the services provided by the organisation,
 - (2) the complexity of the organisation,
 - (3) the results of past oversight,
 - (4) the assessment of risks associated to the GH services provided by the organisation and its risk exposure,
 - (5) the organisation's safety performance.
- (c) When establishing the oversight programme, the competent authority shall consider the use by the GH organisation of industry standards and good practices, based on the results of the assessment referred to in point ARGH.OVS.310(a).
- (d) The competent authority shall apply an oversight planning cycle not exceeding 48 months, starting from the date when the initial declaration is received. The oversight cycle shall include:
 - (1) audits and inspections, including unannounced audits or inspections, as appropriate; and
 - (2) meetings between the accountable manager and the competent authority to ensure both remain informed of significant issues, at least one within an oversight cycle.
- (e) The number of stations to be overseen within a cycle shall be relevant to complete the full scope of the oversight programme. The scope and frequency of station oversight may be determined by the results of the oversight of the GH organisation's management system.
- (f) The oversight planning cycle may be extended to maximum 72 months if the competent authority has established that, during the previous audit cycle:
 - (1) the GH organisation has demonstrated an effective management system, including compliance monitoring, identification of aviation safety hazards and management of associated risks;
 - (2) the GH organisation has continually demonstrated that it has full control over all changes as per ORGH.GEN.130;
 - (3) no level 1 findings have been issued;
 - (4) all corrective actions have been implemented within the time period accepted or extended by the competent authority as per ARGH.OVS.325;
- (g) In addition to the conditions listed in point (f), the oversight planning cycle may be extended to maximum 72 months if the following conditions are met:
 - (1) the GH organisation submits a general yearly report to its competent authority, and
 - (2) the competent authority assesses the safety performance and the regulatory compliance resulting from that report to be satisfactory.

- (h) The oversight cycle may be shortened if there is evidence that the safety performance of the GH organisation has decreased.
- (i) The oversight programme shall include records of the dates when audits, inspections and meetings are due and when they have been carried out.

Rationale

For point (c) please see the explanations provided in NPA 2023-10x section 2.6 subpoint 8.

Alternative to point (d)

For the oversight cycle (point (d)), an alternative proposal is to apply different cycles taking into account the size of the biggest airport on which they operate in the EASA Member States by using the same criteria as those from the Ground Handling Council Directive 96/67/EC, i.e., 2 million passengers per year or 50.000 tons of freight.

The proposal is this:

- *If the largest airport where a pan-European GH organisations provides services is above those criteria => maximum oversight cycle is proposed to be 48 months, with the possibility to extend to 72 months based on the criteria of proposed point (f) above.*
- *If the largest airport where a pan-European GH organisations provides services is below those criteria => maximum oversight cycle is proposed to be 72 months.*
- *For GH organisations providing services only within one Member State, the oversight cycle is determined by the National Competent Authority based on the assessment of risks associated to the GH services provided.*

Stakeholders are invited to state their arguments about this alternative proposal and whether this should be integrated in this implementing rule.

Further AMC will be added to point (g)(1) to determine the level of detail to this yearly report.

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

MAINTAINING THE OVERSIGHT PROGRAMME – REGULAR REVIEW

- (a) To ensure that its oversight programme is adequately maintained, as required by ARGH.OVS.305, the competent authority should regularly review the oversight planning cycle and related oversight programme for each organisation to ensure that they remain adequate for any changes in the complexity or safety performance of the organisation.
- (b) When reviewing the oversight planning cycle and related oversight programme, the competent authority should also consider any relevant information collected in accordance with ORGH.GEN.160 and ARGH.OVS.300(d).

AMC1 ARGH.OVS.305(b);(c) Oversight programme**PROCEDURES FOR OVERSIGHT OF GH ORGANISATIONS**

- (a) The competent authority should assign an inspector for each GH organisation with an overall responsibility for supervision of, and liaison with the organisation's management, and for reporting on compliance with the requirements applicable to its operation. When more than one inspector is assigned to a GH organisation, their responsibilities should be clearly defined.
- (b) Inspections, audits, and oversight procedures, on a scale and frequency commensurate with the operation, should include, but not limited to items from the following list:
- (1) organisation's management system;
 - (2) safety management, safety risk identification and mitigation actions;
 - (3) reporting records;
 - (4) manuals and procedures;
 - (5) training records and written samples of the training process;
 - (6) provision of GH services during the aircraft turnaround process;
 - (7) ground support equipment, including their maintenance records;
 - (8) dangerous goods – operational procedures, training, related documentation.
- (c) The following types of inspections should be included, as part of the oversight programme:
- (1) inspection of documents and records;
 - (2) Inspections of passenger acceptance in view of correct application of procedures related to the safe transportation of dangerous goods;
 - (3) inspection of GH activities during turnaround, including passenger boarding and disembarkation;
 - (4) inspection of training to GH personnel;
 - (5) inspection of cargo operations, where applicable.
- (d) An inspection/audit should focus on the items selected for the scope of that inspection/audit. Inspections and audits may be conducted jointly or separately. Inspections and audits may also be coordinated with those conducted by the competent authorities responsible for other areas. Joint audits with competent authorities for other areas should also be performed because they are particularly effective to examine the interfaces between different actors at the aerodrome, such as aerodrome operators, GH organisation, and aircraft operators.
- (e) Inspections may, at the discretion of the competent authority, be conducted with or without prior notice to the GH organisation.
- (f) Following the provisions of Article 89 of Regulation (EU) 2018/1139, inspectors should take account of any conditions that may indicate a significant deterioration in the organisation's financial situation. In such a case, the competent authority should immediately inform the competent authority designated for the implementation of the Council Directive on Groundhandling 96/67/EC. When any significant financial problems are identified, the competent authority should increase technical surveillance of the provision of GH services with particular emphasis on the upholding of safety performance and the effectiveness of the organisation's management system.

- (g) The number or the magnitude of the non-compliances identified by the competent authority will serve to support its continuing confidence in the organisation or, alternatively, may lead to an erosion of that confidence. In the latter case, the competent authority will need to review any identifiable shortcomings of the management system and take appropriate action if required.

GM1 ARGH.OVS.305(b);(d) Oversight programme

ASSESSMENT OF ASSOCIATED RISKS – FINANCIAL SITUATION

Considering the provisions of Article 89 of Regulation (EU) 2018/1139 on the socio-economic risks to aviation safety, the competent authority could consider the following information as examples of trends that may indicate problems in a GH organisation's financial situation. These topics could even be addressed during the discussions with the accountable manager:

- (a) considerable lay-offs or turnover of personnel, reduced personnel resources, increased multi-tasking, changing shift patterns, and increased overtime;
- (b) delays in managing payments to staff;
- (c) reduction of safe operational standards;
- (d) decreasing training standards;
- (e) supplier breach of credit towards the organisation;
- (f) inadequate maintenance of the GSE; and
- (g) shortage of supplies and spare parts.

AMC1 ARGH.OVS.305(b) Oversight programme

AUDIT

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

AMC2 ARGH.OVS.305(b) Oversight programme

OVERSIGHT PROGRAMME

- (a) When defining the oversight programme and planning the oversight planning cycle for a GH organisation, the competent authority should assess the risks related to the activity of each organisation and adapt the oversight to the level of risk identified and to the organisation's ability to effectively manage those risks. The following elements should be considered to assess the risk exposure of a GH organisation and its safety performance, besides those identified in points (b), (c) and (e) of ARGH.OVS.305:

- (1) information from the GH organisation's annual activity reports and internal review as per AMC1 ORGH.MGM.200(b)(7);
 - (2) information from the verification of occurrence reports linked to the organisation's GH activities;
 - (3) type(s) of GH services provided at each aerodrome and size and complexity of those aerodromes;
 - (4) specific procedures implemented by the organisation related to any flexibility provisions in accordance with Article 71 of Regulation (EU) 2018/1139 or alternative means of compliance used;
 - (5) number of contracted services in the scope of GH service provision;
 - (6) the effectiveness of the organisation's management system in addressing non-compliances;
 - (7) any other safety-relevant data resulting from the audits and inspections.
- (b) The oversight programme should follow a risk-based approach and should be developed on a yearly basis.
 - (c) The competent authority should include all GH organisations into the programme not later than 12 months after the date of the first declaration received.
 - (d) The oversight programme should also include a certain percentage of unannounced inspections, as determined by the competent authority.
 - (e) Additional audits and inspections to specific GH organisations may be included in the oversight programme based on the assessment of associated risks carried out within the occurrence reporting scheme(s).
 - (f) The sections of the oversight programme dealing with inspections of GH activities performed during turnaround should be developed based on geographical locations, considering aerodrome activity, and focusing on key issues that can be inspected in the time available without unnecessarily delaying the operations.

AMC1 ARGH.OVS.305(d) Oversight programme

OVERSIGHT PLANNING CYCLE

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

- (e) Audits should include at least one on-site audit of the GH organisation within each oversight planning cycle.

GM1 ARGH.MGM.OVS.305(b) Oversight programme

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

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

AMC1 ARGH.OVS.305(f) Oversight programme

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

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

ARGH.OVS.310 Industry standards

- (a) For the purpose referred to in ARGH.OVS.305, the Agency shall develop and implement a process to regularly evaluate, involving expertise provided by Member States, the content of industry standards used by GH organisations on a voluntary basis to comply with this Regulation.
- (b) Industry standards subject to the evaluation referred to in point (a) shall 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 Annexes III and IV to this Regulation, as applicable, in sufficient detail to ensure that the relevant implementing rules are met;
- (3) they are based on experience in the field and have proven themselves through testing.
- (4) if applicable, they are supported by scientific documentation, safety tests, and safety impact assessment;
- (5) they include the technical, operational and, if applicable, human-factor 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.

Rationale

Please see NPA 2023-10x, Section 2.6, subpoint 7.

GM1 ARGH.OVS.310 Industry standards

INDUSTRY STANDARDS AND GOOD PRACTICES IN THE SCOPE

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

- (a) The list below contains the documents considered in the scope of evaluation as per ARGH.OVS.310:
 - (1) IATA Ground Operations Manual (IGOM),
 - (2) IATA Airport Handling Manual (AHM),
 - (3) IATA Cargo Handling Manual (ICHM),
 - (4) IBAC IS-BAH ground handling for business aviation operations.
- (b) Other industry standards used in GH:
 - (5) Joint Inspection Group (JIG) standards related to fuelling,
 - (6) Society of Automotive Engineers (SAE) standards related to de-icing and anti-icing,
 - (7) EN standards for ground support equipment (EN 12312-1 to 20 and EN 1915-1 to 4).

AMC1 ARGH.OVS.310 Industry standards

OVERSIGHT OF ORGANISATIONS USING INDUSTRY STANDARDS AND GOOD PRACTICES

- (a) For the oversight of a GH organisation that applies industry standards and good practices, the competent authority should verify that their actual implementation in the GH organisation's daily operation complies with this Regulation.

- (b) The competent authority should verify whether the deviations from the industry standards have been properly identified and, where relevant, justified through a safety risk assessment.
- (c) The implementation of industry standards and good practices by an organisation should not be assessed in isolation from the other elements to be considered by the competent authority for its risk-based oversight.
- (d) The competent authority should share the result of assessment of deviations from industry standards applied by GH organisations with the other competent authorities and EASA.

AMC1 ARGH.OVS.310(a) Industry standards

EVALUATION OF A RECOGNISED INDUSTRY STANDARD

The evaluation process of recognised industry standards that have been issued a certificate by an appropriately accredited organisation may be reduced to the confirmation that they address the scope of Annex III or Annex IV to the GH Regulation, as the case may be.

The actual implementation of the recognised industry standard by the GH organisation should be verified during the audit process.

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

REPRESENTED INDUSTRY STAKEHOLDERS

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

GM1 ARGH.OVS.310(b) Industry standards

EXPERIENCE IN THE FIELD, SCIENTIFIC DOCUMENTATION AND SAFETY TESTS IN SUPPORT OF DEVELOPING INDUSTRY STANDARDS AND GOOD PRACTICES

- (a) It is expected that industry standards related to a product are supported by scientific documentation and safety tests, such as:
 - (1) ground support equipment,
 - (2) de-icing/anti-icing fluids,
 - (3) fuel.
- (b) It is expected that industry good practices covering GH processes, operations, the use of products, and organisational aspects are rather based on years of experience in the field, trials and errors proving that a certain practice is better than others. It can be difficult to prove good practices are based on scientific evidence or safety tests. Indeed, they are sometimes the result of a safety impact assessment and may be subject to a series of safety test before being disseminated or used on a larger scale.

- (c) The following guidelines³ can be used to establish criteria for good practices:
- (1) Eligibility criteria:
 - (i) have a clear context description,
 - (ii) have a clear description of the objectives and purposes,
 - (iii) have a clear description of the actions/activities involved,
 - (iv) be at least one year old.
 - (2) Selection criteria:
 - (i) they are relevant to the identified needs,
 - (ii) they have sufficient indication of transferability, such as:
 - (A) they continue after the initial phase;
 - (B) they attract structural funding, support from new sponsors or generate own resources;
 - (C) they show potential for replication in different contexts and towards different target groups.
- (d) The human factors should be reflected in both industry standards and good practices when applicable.

ARGH.OVS.315 Oversight tasks

The competent authority responsible for the oversight of an organisation providing GH services only at aerodromes in its Member State shall ensure that the tasks to complete the oversight scope cover all the following aspects:

- (a) Compliance with Annex III to this Regulation:
- (1) the organisation's management system and organisational structure, processes, programmes and procedures applicable to the GH organisation as a whole;
 - (2) safety policies and processes, safety management system,
 - (3) safety and occurrence reporting process,
 - (4) the compliance monitoring function,
 - (5) the documentation system,
 - (6) the GH training programmes,
 - (7) the ground support equipment (GSE) maintenance programme,
 - (8) any other overarching organisational processes, programmes and procedures within the scope of its declaration and applicable to the organisation as a whole.
- (b) Compliance with Annex IV to this Regulation:
- (1) the management system elements of Annex III to this Regulation, particularly:

³ The criteria have been [published](#) by Commission on a different purpose, but they can be extrapolated also to this domain.

- (i) organisational structure and GH activities at individual stations,
 - (ii) hazard identification,
 - (iii) risk assessment and mitigation, including mitigations of safety risks specific to operation at that aerodrome,
 - (iv) content of the ground operations manual,
 - (v) training records,
 - (vi) GSE maintenance programme,
 - (vii) occurrence reporting,
- (2) the operational requirements of Annex IV to this Regulation.
- (c) Any other necessary arrangements, approvals or authorisations required by the aerodrome operator.

ARGH.OVS.320 Declaration of ground handling organisations

- (a) Upon receiving a declaration from a GH organisation, the competent authority shall acknowledge the receipt of the declaration or the notification of change and shall verify that it contains all the information required by point ORGH.DEC.100 and, for the notification of changes, point ORGH.GEN.130 of Annex III to this Regulation.
- (b) If the declaration is not duly filled in or contains information that is not in accordance with the applicable requirements, the competent authority shall notify the GH organisation about the missing or incorrect elements and request further information. If deemed necessary, the competent authority shall carry out an inspection of the organisation. If the non-compliance is confirmed, the competent authority shall take action as defined in point ARGH.OVS.325.
- (c) The competent authority shall have a readily available and up-to-date evidence of the declarations of the GH organisations under its oversight.
- (d) If the declaration contains information that the GH organisation provides or intends to provide services also at aerodromes that are not within its oversight responsibilities, the competent authority receiving the declaration or the notification of change shall inform all the other competent authorities concerned and shall ensure they have access to the declaration, the notification of change, and all related documentation.

GM1 ARGH.OVS.320 Declaration of ground handling organisations

VERIFICATION OF DECLARATIONS

The verification of the declaration received from a GH organisation does not imply an assessment of its content or the associated documents. It is a formal verification, through which the competent authority ensures that all the documents required in accordance with ORGH.DEC.100 have been submitted, that the declaration has been correctly filled in and signed, there is no missing information, etc.

AMC1 ARGH.OVS.320 Declaration of ground handling organisations**ACKNOWLEDGEMENT OF RECEIPT**

The competent authority should acknowledge receipt of the declaration in writing, by electronic mail, within 10 working days.

ARGH.OVS.325 Findings, observations, corrective actions and enforcement measures

- (a) The competent authority shall have a system to analyse findings to determine their safety significance and to manage them with the purpose of:
- (1) ensuring that compliance with the requirements is established as soon as possible; and
 - (2) preventing their reoccurrence.
- (b) A level 1 finding shall be issued by the competent authority when it detects any significant non-compliance with the applicable requirements of Regulation (EU) 2018/1139 and its delegated and implementing acts or of the declaration submitted, which lowers safety or seriously hazards safety.
- The level 1 findings shall include but not be limited to:
- (1) any failure to grant access of the competent authority to the facilities of the GH organisation as defined in ORGH.GEN.140 during normal operating hours and after two written requests;
 - (2) any evidence of malpractice or fraudulent use of the declaration;
 - (3) the lack of an accountable manager.
- (c) A level 2 finding shall be issued by the competent authority when it detects any non-compliance with the applicable requirements of Regulation (EU) 2018/1139 and its delegated and implementing acts or of the declaration submitted, which is not classified as a level 1 finding and which could lower safety or possibly jeopardize flight or ground safety.
- (d) When the competent authority, during investigation or oversight or by any other means, finds evidence that the GH organisation does not comply with the applicable requirements of Regulation (EU) 2018/1139 and its delegated and implementing acts or the declaration submitted in accordance with this Regulation, the competent authority shall:
- (1) raise a finding, record it, communicate it in writing to the representative of the organisation, and determine a reasonable period of time within which the organisation shall take the measures specified in point ORGH.GEN.150;
 - (2) in case of level 1 findings, if the GH organisation fails to submit an acceptable corrective action in accordance with point ORGH.GEN.150, take immediate and appropriate action to limit or prohibit the GH activities affected by the non-compliance or, as necessary, temporarily or permanently deregister a declaration of the GH organisation, until it has taken the corrective action referred to in point (1);
 - (3) in case of level 2 findings,
 - (i) grant the organisation a corrective-action implementation period included in an action plan appropriate to the nature of the finding. At the end of the period and

subject to the nature of the finding, the competent authority may extend the initial period subject to a satisfactory corrective action plan with which it has agreed; and

- (ii) assess the corrective action plan proposed by the organisation and, if the assessment concludes that it is sufficient to address the non-compliance(s), accept it.

If the GH organisation fails to submit an acceptable corrective action plan or to perform the corrective action plan within the time period accepted or extended by the competent authority, the finding shall be raised to level 1 finding, and action taken as laid down in point (2).

- (4) In applying the actions listed in points (2) and (3), the competent authority shall coordinate with the other competent authorities concerned, as necessary, to ensure that the continuity of operation and provision of GH services at that aerodrome are not impeded.
 - (5) Take any further enforcement measures necessary to ensure the closing of the non-compliance and, where relevant, remedy its consequences.
 - (6) The competent authority shall record all findings it has raised and, where applicable, the enforcement measures it has applied as specified in Regulation (EU) 2018/1139 Article 62 points 2(d), (e), as well as all corrective actions and date of action closure of findings.
- (e) The competent authority shall inform the aerodrome operator concerned of the findings to the GH organisation if those are relevant for the safety of that aerodrome.

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

MANAGEMENT OF FINDINGS

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

ARGH.OVS.330 Cooperative oversight

- (a) The competent authorities responsible for the oversight of organisations providing GH services in more than one Member State or at aerodromes that are under the oversight responsibility of more than one competent authority, shall cooperate to ensure effective and efficient oversight of those organisations and their services. Those competent authorities shall ensure mutual exchange of information and assistance to complete their oversight tasks and responsibilities.
- (b) The cooperative oversight shall cover the following organisations having their principal place of business in an EU Member State and providing GH services in more than one Member State or at aerodromes that are under the oversight responsibility of more than one competent authority:
- (1) independent ground handling service providers; and
 - (2) self-handling aircraft operators that may or may not be part of a single air carrier business grouping.
- (c) The mutual exchange of information shall cover the following elements:
- (1) declarations of GH organisations and related documents to prove compliance with Regulation (EU) 2018/1139 and its delegated and implementing acts,
 - (2) alternative means of compliance used,
 - (3) audit reports, corrective actions, corrective action plans, root-cause analyses, and any other information on the relevant findings raised, follow-up actions, as well as any enforcement measures taken as a result of oversight; and
 - (4) information stemming from mandatory and voluntary occurrence reporting as required by ORGH.GEN.160 on reporting of safety-related occurrences.
- (d) The tasks for the oversight of an organisation under point (b) shall be assigned as follows:
- (1) The competent authority of the Member State where the organisation has its principal place of business shall verify the following elements, either alone or supported by any of the other competent authorities concerned:
Compliance with Annex III to this Regulation:
 - (i) the organisation's management system and organisational structure, processes, programmes and procedures applicable to the GH organisation as a whole;
 - (ii) safety policies and processes, safety management system,
 - (iii) safety and occurrence reporting process,
 - (iv) the compliance monitoring function,
 - (v) the documentation system,
 - (vi) the GH training programmes,
 - (vii) the ground support equipment (GSE) maintenance programme, and
 - (viii) any other overarching organisational processes, programmes and procedures within the scope of its declaration and applicable to the organisation as a whole.
Compliance with Annex IV to this Regulation:

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- (ix) To complete the oversight scope, the competent authority referred to in point (1) shall also conduct inspections at the aerodromes in that State, as listed in point (2).
- (2) Each competent authority of the Member States where the organisation provides GH services, other than the Member State where its principal place of business is located, shall oversee the safe provision of services at the stations in their Member State, by verifying the actual implementation of:
- (i) the management system elements of Annex III to this Regulation, particularly:
 - (A) organisational structure and GH activities at individual stations,
 - (B) hazard identification,
 - (C) risk assessment and mitigation, including mitigations of safety risks specific to operation at that aerodrome,
 - (D) content of the ground operations manual,
 - (E) training records,
 - (F) GSE maintenance programme,
 - (G) occurrence reporting,
 - (ii) the operational requirements of Annex IV to this Regulation, and
 - (iii) any other necessary arrangements, approvals or authorisations required by the aerodrome operator.
- (3) Each of the competent authorities in points (1) and (2) shall:
- (i) agree with the organisation on the proposed corrective action plan and corrective actions to address the non-compliances identified at the station under their oversight;
 - (ii) inform all the other competent authorities concerned on the audits and inspections reports and the corrective actions.
- (4) In case of a level 1 finding raised to an organisation as referred to in point (b), the competent authority raising the finding shall immediately inform the other competent authorities concerned. Each of the competent authorities responsible for the oversight of that organisation shall assess whether and to what extent the finding affects the stations under its oversight. Each competent authority shall apply the most appropriate action it considers necessary to ensure, as the case may be, the closing of the non-compliance and remedy its consequences.
- (5) In case of a level 1 finding raised on lack of an accountable manager, the competent authority raising the finding shall immediately inform the other competent authorities concerned and they shall all apply the same action uniformly at all the stations under their oversight. They shall take any further enforcement measure necessary to ensure the closing of the non-compliance and remedy its consequences.
- (6) All the competent authorities involved in the oversight of an organisation referred to in point (b) shall support the competent authority of the organisation's principal place of business to periodically update the safety performance of the organisation based on the oversight reports from individual stations in the other Member States.
- (e) Any of the competent authorities responsible for the oversight of an organisation referred to in point (b) may participate in the oversight of the organisation's management system together

with the competent authority of the Member State where the organisation has its principal place of business.

- (f) The competent authorities shall use the Repository of Information developed in accordance with Article 74 of Regulation (EU) 2018/1139 to access the documents and information referred to in point (c).

GM1 ARGH.OVS.330 Cooperative oversight

SYSTEMIC AND OPERATIONAL NON-COMPLIANCES

- (a) A *systemic non-compliance* is understood as a non-compliance related to the main components of a GH organisation's management system, such as
- (1) SMS,
 - (2) compliance monitoring process,
 - (3) documentation system,
 - (4) the training programme,
 - (5) the ground support equipment (GSE) operation and maintenance programme,
 - (6) general approach to the operational procedures.
- (b) A systemic non-compliance does not include:
- (1) operational procedures specific to an aerodrome as required by the aerodrome operator;
 - (2) risk assessment and risk mitigation measures developed for the operational context of an aerodrome.
- (c) By comparison, an *operational non-compliance* is specific to an individual station, as it is related to the individual way in which the management system or operational requirements are implemented at that aerodrome. These are, by default, non-systemic issues, which are not reiterated at other stations where that GH organisation provides services. An operational non-compliance does not require an action on the part of another competent authority in another Member State.

Rationale

This GM explains two different types of findings, one that affects an organisation's management system and may have consequences at other stations (systemic finding), and the other one affecting only operation at one station and which has no consequences at other stations (operational finding). The terms are proposed to be introduced to help competent authorities to determine the need of applying cooperative oversight to a GH organisation that provides services in more than one Member State or not.

GM2 ARGH.OVS.330 Cooperative oversight

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

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

GM3 ARGH.OVS.330 Cooperative oversight

METHODS TO IMPLEMENT COOPERATIVE OVERSIGHT

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

- (a) Develop a common toolbox of materials and checklists to be used when conducting inspections and audits.
- (b) Develop a common training programme and deliver training sessions for all GH inspectors.
- (c) Organise joint inspections of the management system of the GH organisation.
- (d) Discuss together the findings raised, their legal basis, and the corrective actions proposed by the organisation. Identify the best way forward for similar cases.
- (e) Organise sessions of recurrent training to include exchange of experience in another Member State, to exchange best practices with inspectors from other competent authorities.

- (f) Additional support could refer to the translation of relevant parts of an audit report or of occurrence reports from the original language into English or any other language upon which the competent authorities concerned agree.

Rationale:

The purpose of this GM is to provide a few examples of methods that competent authorities could use to perform cooperative oversight.

Existing guidelines or good practices for cooperative oversight can be used and adapted to the specifics of the GH activities. For example, the guidelines for competent authorities developed in the air operations domain for the oversight of AOC holders using the business model of group operations (to be published on the EASA website in 2022) can be used as a good practice guidance to ensure cooperative oversight.

Stakeholders are invited to state their opinion on the possibility to elevate this GM at AMC level.

DRAFT

ANNEX III

ORGANISATION REQUIREMENTS FOR GH ORGANISATIONS (PART-ORGH)

SUBPART GEN – GENERAL REQUIREMENTS (ORGH.GEN)

ORGH.GEN.005 Scope

This Annex establishes requirements for the organisations listed in Article 1(2) of this Regulation, which provide GH services at aerodromes within the scope of Regulation (EU) 2018/1139.

ORGH.GEN.105 Competent authority

- (a) The competent authority responsible for receiving a declaration and overseeing a GH organisation shall be the authority designated in accordance with point ARGH.GEN.100.
- (b) In accordance with point ARGH.GEN.100(b), a single GH organisation business grouping or a self-handling aircraft operator that has its principal place of business in a Member State and provides GH services in more than one Member State shall submit a declaration to the competent authority designated by the Member State where its principal place of business is located.
- (c) The principal place of business of a single GH organisation business grouping referred to in point (b) shall be the place that meets all the following criteria:
 - (1) it is where the corporate financial functions are exercised. These comprise all financial activities that are necessary to manage and maintain the organisation viable and financially fit;
 - (2) it is the place where the accountable manager, who holds the ultimate accountability for safety within their organisation, is exercising their role; and
 - (3) it is the effective and actual centre of operations and control from where business development and continuity, strategy, and planning activities affecting the single GH business grouping as a whole are managed on a regular basis.

Rationale:

This implementing rule has been changed significantly compared to the previous version published in 2022. It pays due consideration to the different business cases existing in the GH sector: a GH organisation operating only at one aerodrome or in only one Member State vs a pan-European GH organisation that operates in multiple Member States and has more than one competent authority.

The rule is drafted from the perspective of a GH organisation, compared to the way in which the rule with the same name is drafted in Annex II - Authority Requirements. The aspect highlighted in this rule is to which competent authority should a pan-European GH organisation submit its declaration?

The concept of an organisation's principal place of business (PPOB) is proposed to be introduced to streamline the declaration submission process as well as the cooperative oversight process and sharing

of oversight responsibilities between the competent authorities involved in the oversight of an organisation that provides GH services in more than one Member State. The text describing the main characteristics to identify an organisation's PPOB is based on European Commission guidelines to Member States. It is supposed to also cover the case of a single GH organisation business grouping, which consists of multiple branches of the same 'parent' company, when the branches are each registered in a different State.

GM1 ORGH.GEN.105 Competent authority

PRINCIPAL PLACE OF BUSINESS

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

be an office where the organisation holds sporadic meetings that are attended by the accountable manager and the key personnel who have travelled there just for the occasion, nor an office where only a few meetings are held per year.

- (6) The records regarding the operational and financial decisions affecting the direction, control, planning, coordination and corporate finance of the organisation's activities and operations, within the scope of the applicable regulations, are always tangible and potentially subject to physical inspection and/or assessment by the competent authority.
- (c) The principal place of business for aircraft operators performing self-handling is already determined in accordance with Regulation (EU) 965/2012.

ORGH.GEN.110 Responsibilities of the GH organisation

- (a) The GH organisation shall be responsible for the safe provisions of services in accordance with all of the following:
 - (1) requirements of this Regulation;
 - (2) Regulation (EU) 2018/1139 and its delegated and implementing acts;
 - (3) its declaration;
 - (4) the requirements and procedures for local operation contained in the aerodrome manual applicable to it;
 - (5) the operational procedures and instructions of the aircraft operator related to GH services, when provided or, when not provided, in accordance with the GH organisation's operational procedures.
- (b) The GH organisation shall establish a ground operations manual (GOM) and shall operate in accordance with it.
- (c) The GH organisation shall establish standards and objectives for the performance of GH activities and develop operational procedures to achieve them. It shall also define the functions for the performance of those activities, including the associated decision-making, authority, tasks and responsibilities of those functions. All these shall be documented in its ground operations manual (GOM).
- (d) The GH organisation shall ensure that all personnel involved in ground handling activities:
 - (1) are trained and competent to perform the assigned tasks before being allowed to perform their duties unsupervised and their competence is maintained;
 - (2) are aware of their responsibilities and understand their role and how their duties are related to the safety of air transport operations.
- (e) The GH organisation shall ensure that the ground support equipment (GSE), tools and, if applicable, GSE software used for the provision of GH services are functional and their maintenance, calibration and accuracy are periodically verified and current.
- (f) The GH organisation shall establish and implement a maintenance programme for its GSE.

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

COMPLIANCE WITH APPLICABLE REQUIREMENTS

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

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

GROUND OPERATIONS MANUAL (GOM)

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

ORGH.GEN.115 Start of operation

A GH organisation may start operating at an aerodrome when it fulfils all the following conditions:

- (a) The GH organisation has declared its activity to the competent authority.
- (b) The GH organisation has informed the aerodrome operator of its intention to start providing services at that aerodrome and has established a formal arrangement with that aerodrome operator in accordance with Regulation (EU) 139/2014. Such a formal arrangement shall include the following information:
 - (1) type of GH services intended to be provided at that aerodrome; and
 - (2) methods of exchanging operational information with the aerodrome operator.

GM1 ORGH.GEN.115(a) Start of operation

PREPARATION STEPS

The intention of the implementing rule is to set up the right order of these steps, to minimise the efforts of the GH organisation to start operation at an aerodrome that restricts access in accordance with the Council Directive 96/67/EC.

The GH organisation can already start preparing its organisation as per the declaration even before the completion of formalities to receive authorisation to operate at an aerodrome where Council Directive 96/67/EC might apply to their services. In such a case, the GH organisation can indicate, as evidence of its intentions, an initial letter of intent or any other document to indicate that the GH organisation has already received, or is in the process of being granted, authorisation to operate at that aerodrome.

ORGH.GEN.120 Means of compliance

- (a) The GH organisation may use alternative means of compliance to the acceptable means of compliance (AMC) adopted by the Agency to demonstrate compliance with Regulation (EU) 2018/1139 and its delegated and implementing acts.
- (b) If the GH organisation uses alternative means of compliance, it shall provide the competent authority with the list of those alternative means of compliance and shall make them available to the competent authority in due time for oversight purposes.

AMC1 ORGH.GEN.120 Means of compliance

DEMONSTRATION OF COMPLIANCE

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

GM1 ORGH.GEN.120 Means of compliance

INFORMATION TO THE COMPETENT AUTHORITY AND RISK ASSESSMENT

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

ORGH.GEN.125 Use of industry standards

- (a) The GH organisation may use either its own operational procedures or industry standards to comply with this Annex or Annex IV to this Regulation.
- (b) When applying industry standards on a voluntary basis, the GH organisation shall ensure that they comply with the criteria for safety and quality listed in ARGH.OVS.310.

AMC1 ORGH.GEN.125 Use of industry standards

INDUSTRY STANDARDS AND GOOD PRACTICES

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

Use of industry standards and internal compliance monitoring checks

- (e) The GH organisation should apply its compliance monitoring function to ensure continued compliance with this Regulation when using industry standards and good practices to comply with this Regulation.

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

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

ORGH.GEN.130 Management of changes

- (a) The GH organisation may apply changes to its organisation, management system or GH services provided. The organisation shall have and implement a process to manage changes as part of its

managements system and if the changes directly affect its declaration, it shall ensure the following:

- (1) assess the safety risks of the intended changes; establish minimum safety criteria to support the safety assessment; implement mitigations to address those risks;
 - (2) determine if and how the changes will affect other organisations and, if necessary, involve those organisations in the safety risk assessment and risk mitigation;
 - (2) align mitigations with any affected organisations in a systematic way;
 - (3) document the process.
- (b) The GH organisation shall inform the competent authority, without undue delay, of any changes to the declaration and submit an amended declaration.
- (c) The GH organisation shall provide the competent authority with the relevant documentation covering point (a) in due time for an audit or inspection.

AMC1 ORGH.GEN.130 Management of changes

PROCESS TO MANAGE CHANGES

- (a) The GH organisation should cover the following aspects in the process of managing the changes:
- (1) identify changes within the GH organisation's management system components or the provision of ground handling services, which may affect the established processes, procedures and services;
 - (2) consider the interfaces and align, wherever possible, the risk mitigation measures with those of the other organisations affected by the change;
 - (3) describe the measures taken to ensure safety performance before implementing the changes.

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

ASSESSMENT OF CHANGES

- (a) The GH organisation could assess the safety risk of a change by following these steps:
- (1) identify the scope of the change;
 - (2) identify the hazards;
 - (3) determine the safety criteria applicable to the change;
 - (4) assess the hazards and potential risks or improvements in safety related to the change and, if required, apply mitigation measures to ensure the change meets the applicable safety criteria;
 - (5) verify that the change addresses the scope that was subject to the safety assessment, and that it meets the safety criteria, before the change is applied; and
 - (6) specify the necessary monitoring actions to ensure that the provision of service will continue to meet the safety criteria after the change has been applied.
- (b) The scope of the safety risk assessment includes the following elements and their interaction:

- (1) the operation, management, and human resources;
 - (2) the interfaces and interactions between the elements being changed and the rest of the system;
 - (3) the interfaces and interactions between the elements being changed and the operational context in which they are intended to perform; and
 - (4) the full lifecycle of the change from conception to operations.
- (c) The safety criteria used for the safety assessment of a change:
- (1) are defined as per the procedures for the management of changes contained in its GOM; or
 - (3) are specified with reference to explicit quantitative acceptable safety risk levels, industry standards, the safety performance of the existing ones or a similar system.

Rationale

This GM is proposed to help the GH organisation to manage the changes to any component of its management system. Like any other GM, it is not mandatory, and the GH organisation may decide whether it intends to apply this GM or it has a different method to assess the safety risk of a change to its organisation.

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

CHANGES NOT AFFECTING THE DECLARATION

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

ORGH.GEN.140 Access

For the purpose of determining whether a GH organisation acts in accordance with its declaration, the GH organisation shall ensure that the specific persons duly authorised by the competent authority, at any time:

- (a) are granted access to any facility, document, records, data, procedures or any other material relevant to its activity;

- (b) are allowed to perform or witness any action, inspection, test, assessment or exercise that the competent authority finds necessary.

ORGH.GEN.150 Findings and corrective actions

- (a) When the GH organisation receives a finding from the competent authority in accordance with point ARGH.OVS.325, it shall take the following steps within the time period determined by the competent authority:
- (1) identify the root cause(s) of the non-compliance(s) and the contributing factors of those non-compliances;
 - (2) develop a corrective action plan that addresses the root cause(s) and the factors contributing to the non-compliance(s); and
 - (3) demonstrate the implementation of the corrective action(s) to the satisfaction of the competent authority, either at management system level or at station level, or both, as the case may be.
- (b) In addition to point (a), in case of a GH organisation that may or may not be part of a single business grouping, which provides GH services in more than one Member State, the findings raised at one station and the related corrective action plans and corrective actions shall be communicated by the responsible person at that station to the organisation's head office at its principal place of business.
- (c) When the non-compliance directly affects the safety risk within, or the responsibilities of, the aircraft operator or the aerodrome operator, the GH organisation shall inform the aerodrome operator and the aircraft operators concerned of the actions detailed in point (a) and, if appropriate, coordinate such actions with them.

Rationale

Point (c) has been drafted in line with the similar proposed amendments to the Air Ops regulation and the Aerodrome regulation. It is intended to enable the sharing of safety relevant information among the 3 stakeholders most affected by common interfaces in GH operations.

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

GENERAL

- (a) The corrective action plan defined by the organisation providing GH services should address the effects of the non-compliance, as well as its root cause(s) and contributing factors(s).
- (b) When a finding is raised at an individual station of a pan-European GH organisation or a GH organisation part of a single GH business grouping, the GH organisation may decide how the corrective action will be implemented – either at station level, at country level, or at management system level, aiming to address the issue at all the stations where the same finding has been or may be raised.
- (c) In the case of level 2 findings, the operator should submit a root cause analysis and a corrective action plan to the competent authority within a specified period of time. This period should be shorter than the corrective action implementation period, in order to provide sufficient time for

the competent authority to agree on the submitted corrective action plan and for the operator to implement it before the end of the implementation period.

GM1 ORGH.GEN.150 Findings and corrective actions

CAUSAL ANALYSIS

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

ORGH.GEN.155 Immediate reaction to a safety problem and safety directives

- (a) The GH organisation shall implement any safety measures mandated by the competent authority in accordance with ARGH.GEN.135 and ARGH.GEN.140.
- (b) The GH organisation shall inform the aircraft operator to which it provides services and the aerodrome operators concerned of the relevant measures implemented under point (a).

ORGH.GEN.160 Reporting of safety-related occurrences

- (a) As part of its management system, the GH organisation shall establish and maintain a reporting system for safety-related occurrences and events that meets the requirements of Regulation (EU) No 376/2014 and Regulation (EU) 2018/1139, as well as their delegated and implementing acts. This system shall include mandatory and voluntary reporting.
- (b) As per Regulation (EU) No 376/2014, the GH organisation shall report to the competent authority, as well as to any other organisation required to be informed by the Member State where the aerodrome is located, any safety-related event or condition that endangers or, if not corrected or addressed, could endanger an aircraft, its occupants or any other person, and in particular any accident or serious incident.
- (c) Notwithstanding point (b), the GH organisation shall report the following dangerous goods events, without delay, to the competent authority of the aircraft operator and the appropriate authority of the State of occurrence, in accordance with the Technical Instructions:

- (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.
- (d) The GH organisation shall also transmit the occurrence reports referred to in points (b) and (c) to the aerodrome operator and the affected aircraft operator and, if relevant, to the air traffic service provider and any other GH organisation concerned that operates at the aerodrome of the occurrence.
- (e) Without prejudice to Regulation (EU) 376/2014 and its delegated and implementing acts, the reports referred to in points (c) and (d) shall:
- (1) be transmitted as soon as practicable, but no later than 72 hours after the GH organisation became aware of the occurrence, unless exceptional circumstances prevent this;
 - (2) for the reports in point (c), be made in a form and manner established by the competent authority of the aircraft operator as defined in Regulation (EU) 965/2012;
 - (3) contain all pertinent information about the condition known to the GH organisation at the time of reporting.
- (f) Without prejudice to Regulation (EU) 376/2014 and its delegated and implementing acts, for reports required under points (b) and (c), when relevant, the GH organisation shall produce a follow-up report providing details of actions it intends to take to prevent similar occurrences in the future, as soon as these actions have been identified. The follow-up report shall be:
- (1) sent to the relevant entities initially reported under points (b) and (c); and
 - (2) made in a form and manner established by those competent authorities.

Rationale

It is proposed to bring together the reporting obligations of both Regulations (EU) 376/2014 and 2018/1139 in one rule since the common aim of reporting is to improve safety of operations and collect relevant information from those reports. Both these regulations address reporting of safety events but there are certain overlaps, as well as differences, which should be clearly identified. The link between occurrence reporting requirements and safety management system requirements applicable to competent authorities and GH organisations must be addressed in an unambiguous way.

Regulation (EU) 376/2014 covers only vertical reporting – from the front-line organisation to the competent authority. Regulation (EU) 2018/1139 covers also horizontal reporting – to other organisations concerned if the information is relevant for the safety of their own operation. This enables the sharing of relevant safety information already collected for an occurrence report and puts less focus on the form of reporting but rather on the necessity that the relevant safety information is shared with other organisations.

Points (a) and (b) of this implementing rule ensure compliance with Regulation (EU) 376/2014. In point (b), ‘any other organisation required by the State’ refers to the accident/incident investigation body under the control of the State.

Point (c) is related to dangerous goods in accordance with the ICAO Technical Instructions.

Point (d) ensures compliance with point 4.2.2 of the Essential Requirements of the Basic Regulation and with ADR.OR.D.030 of Reg. (EU) 139/2014. The other GH organisations operating at the aerodrome of the occurrence is added on top.

While the Basic Regulation does not establish a mutual obligation for aircraft operators or aerodrome operators to report also to other organisations concerned, as it is the case for GH organisations, the Aerodrome regulation already has a relevant rule in ADR.OR.D.030 Safety reporting systems that requires it to include all organisations providing services or operating at an aerodrome that are relevant to the safety concern to participate in the analysis of such reports. Under RMT.0728, EASA proposes amendments to the Air Ops Regulation and the Aerodrome Regulation to enable the sharing of safety relevant information resulted from findings from aircraft operators and aerodrome operators to GH organisations. Furthermore, ADR.OR.D.030 of Reg. (EU) 139/2014 is proposed to be changed under RMT.0591 by adding the requirement for the aerodrome operator to establish reporting arrangements with all organisations that operate or provide services at the aerodrome whose activities or products may have an effect on aircraft safety. At the same time, NPA 2022-11 of RMT.0392 proposes a change to the occurrence reporting rule ORO.GEN.160 to enable the sharing of relevant safety information with other organisations concerned.

Note: Sending reports to many organisations/institutions using many different channels and formats renders the reporting process unnecessarily complicated and inefficient. The risk is that the result will be the opposite of what is intended with this rule: less reporting, decrease of safety. Regulators responsible for both Regulations should consider this unintended effect and find a common solution to simplify reporting by organisations.

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

REPORTABLE EVENTS – GROUND HANDLING SPECIFIC OCCURRENCES

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

- (1) Incorrect handling or loading of passengers, baggage, mail or cargo, likely to have a significant effect on aircraft mass and/or balance (including significant errors in loadsheet calculations).
- (2) Boarding equipment removed leading to endangerment of aircraft occupants.
- (3) Incorrect stowage or securing of baggage, mail or cargo likely in any way to endanger the aircraft, its equipment or occupants or to impede emergency evacuation.
- (4) Transport, attempted transport or handling of dangerous goods which resulted or could have resulted in the safety of the operation being endangered or led to an unsafe condition (for example: dangerous goods incident or accident as defined in the ICAO Technical Instructions).
- (5) Non-compliance on baggage or passenger reconciliation.
- (6) Non-compliance with required aircraft ground handling and servicing procedures, especially in de-icing, refuelling or loading procedures, including incorrect positioning or removal of equipment.
- (7) Significant spillage during fuelling operations.

- (8) Loading of incorrect fuel quantities likely to have a significant effect on aircraft endurance, performance, balance or structural strength.
- (9) Loading of contaminated or incorrect type of fuel or other essential fluids (including oxygen, nitrogen, oil and potable water).
- (10) Failure, malfunction or defect of ground equipment used for ground handling, resulting into damage or potential damage to the aircraft (for example: tow bar or GPU (Ground Power Unit)).
- (11) Missing, incorrect or inadequate de-icing/anti-icing treatment.
- (12) Damage to aircraft by ground handling equipment or vehicles including previously unreported damage.
- (13) Any occurrence where the human performance has directly contributed to or could have contributed to an accident or a serious incident.

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

COMPETENT AUTHORITY FOR REPORTING

The competent authority to which the GH organisation is required to report is the authority as identified in accordance with point ORGH.GEN.105.

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

COMPETENT AUTHORITY AND APPROPRIATE AUTHORITY OF THE STATE OF OCCURRENCE FOR REPORTING DANGEROUS GOODS EVENTS

- (a) The 'appropriate authority of the State of occurrence' means, for the purpose of dangerous goods reporting, the national competent authority or authorities designated or otherwise recognised by a State to perform specific functions related to the dangerous goods provisions.
- (b) In this case, the appropriate authorities are the competent authority of the aerodrome of occurrence and the competent authority of the GH organisation.
- (c) The competent authority of the GH organisation is the authority assigned in accordance with ORGH.GEN.105.

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

FOLLOW-UP OF OCCURRENCES

- (a) The GH organisation should ensure that the reporting process ends with clear follow-up actions. The follow-up actions should include at least the following steps, documented in writing:
 - (1) the investigation of an occurrence and the analysis that led to the identification of the root cause;
 - (2) the results of the investigation;

- (3) the conclusions of an occurrence;
- (4) the actions taken to prevent similar occurrences in the future; when relevant, those actions should be included in the SMS, with a risk assessment, mitigation measures and safety performance indicators;
- (5) the dissemination and promotion of the actions taken, such as, but not limited to, a change in a procedure or the GH services manual, updates to the training programme, providing feedback to the reporter (when this is not anonymous), safety promotion actions, further actions with other stakeholders involved, etc.

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

FOLLOW-UP REPORT

The GH organisation is not expected to produce a follow-up report in all cases, but rather for occurrences where there is some merit in sharing the causal analysis with the other organisations which may feed it into their own management system. Therefore, the competent authority will decide in which cases a follow-up report would be necessary.

It is recommended that the GH organisation informs the reporting person, when this is known, about the measures to improve safety of operations it has taken as a follow-up of the reported event.

ORGH.GEN.165 Safety reporting system

- (a) The safety reporting system referred to in ORGH.GEN.160 shall aim at improving and promoting safety of GH services and a safety culture within its organisation. It shall:
 - (1) Protect the identity of the reporter, ensure their confidentiality and that of any personal data or details, and include the possibility to report anonymously.
 - (2) Be used for identifying the causes of, and contributing factors to, the errors, near misses and hazards reported, and address them as part of its safety risk management process in accordance with ORGH.MGM.200.
 - (3) Be used for evaluating all known, relevant information relating to errors, near misses, hazards, and the inability to follow procedures.
 - (4) Enable sharing of any other safety relevant information with the organisations with which it has interfaces.
- (b) The GH organisation shall have procedures to:
 - (1) Cover internal safety reporting – mandatory and voluntary, including when the GH organisation uses a separate scheme for voluntary reporting. Encourage voluntary reporting.
 - (2) Record all reports submitted.
 - (3) Determine which events qualify for reporting under points ORGH.GEN.160(b) and (c).
 - (4) Conduct investigations of internal reports, as appropriate.

- (5) In cooperation with the aircraft operator, or the aerodrome operator, or both, as appropriate, analyse and assess the reports or groups of occurrences having the same root cause, in order to address safety deficiencies and identify trends.
 - (6) Participate in the investigation of the reports conducted by the aerodrome operator or the aircraft operator, as appropriate, where the GH organisation is directly affected by the event or the proposed mitigation measures.
 - (7) Take necessary actions to address the root cause of the event and prevent reoccurrences.
 - (8) Provide feedback to the reporter, if this is known, and decide on the appropriate means to disseminate the results and the mitigation measures.
 - (9) Refrain from attribution of blame in line with the 'just culture' principles.
- (c) The GH organisation shall also make arrangements to collect safety issues related to contracted activities.

Rationale

This implementing rule details the system that should be developed for compliance with the safety reporting obligations.

Point (a)(5) is intended to enable sharing of relevant safety information. The mirroring rule in the Aerodrome Regulation is ADR.OR.D.030, at AMC level (see AMC1 point (a)(10)). The mirroring rule in the Air Ops Regulation is proposed in NPA 2022-11 under ORO.GEN.160 and AMC.

AMC1 ORGH.GEN.165 Safety reporting system

GENERAL

- (a) The safety reporting system should include the possibility for voluntary reporting intended for safety hazards identified by the reporter which may have potential safety consequences.
- (b) The GH organisation should provide the means and the format for reporting, which should meet the requirements of ORGH.GEN.160 on occurrence reporting in terms of time, format, and required information to be reported.
- (c) The safety reporting system should include the acknowledgement to the reporter of the successful submission of the report.
- (d) The reporting process should be as simple as possible and well documented, including details on what, how, where, whom, and when to report.
- (e) Access to the submitted reports should be restricted to personnel responsible for storing and analysing them.
- (f) The safety reporting system should include a feedback process to inform the reporter on the outcome of the occurrence analysis.

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

SAFETY RELEVANT INFORMATION

- (a) The safety relevant information that should be shared with the aircraft operator or aerodrome operator, or both, to improve the flight safety and improve the operational procedures to address the safety interfaces between them should include information, data, facts and analysis collected from various sources, such as, but not limited to:
- (1) daily operational performance,
 - (2) audits, inspections, findings and corrective actions,
 - (3) safety reports,
 - (4) accident/incident investigations,
 - (5) safety studies and reviews from official and verified sources.
- (b) The communication of safety relevant information may occur also outside the regulatory framework of occurrence reporting as per ORGH.GEN.160 that implements the essential requirements of Reg. (EU) 2018/1139 (point 4.2.2 of Annex VII). For example, the aerodrome safety committee meetings (see AMC1 ADR.OR.D.027) could be used to keep regular communications on safety matters and share good practices, common procedures, and safety information relevant for the interface processes.

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

INTERNAL SAFETY REPORTING

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

- (6) where relevant, the organisation should cooperate with the aircraft operator or the aerodrome operator on occurrence investigations by exchanging relevant information to improve aviation safety.
- (c) The internal safety reporting scheme should:
 - (1) ensure the confidentiality of the reporter;
 - (2) be closed loop, to ensure that actions are taken internally to address safety issues and hazards; and
 - (3) feed into the recurrent training while maintaining the appropriate confidentiality.
- (d) Feedback should be given to staff both on an individual and a more general basis to ensure their continued support of the safety reporting system.

GM1 ORGH.GEN.165(b)(3) Reporting of safety-related occurrences

SAFETY INVESTIGATION TEAM

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

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

ORGH.GEN.170 Psychoactive substances and medicines

- (a) The GH organisation shall implement a procedure to ensure that its personnel:
 - (1) do not consume alcohol during their duty period;
 - (2) do not perform duties under the influence of psychoactive substances or medicines that may have an effect on their abilities to perform their tasks in a manner contrary to safety.
- (b) The procedure shall be included in the GH organisation's management system and shall be aligned with the aerodrome operator procedure developed for this purpose.

GM1 ORGH.GEN.170 Psychoactive substances and medicines

ICAO GUIDANCE

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

SUBPART MGM — MANAGEMENT SYSTEM (ORGH.MGM)

ORGH.MGM.200 Management system

- (a) The GH organisation shall develop and implement a management system scalable to the type of activities, the size of organisation, and the operational context, to manage the safety risks, aim for continuous improvement of this system, and ensure fostering of a safety culture within its organisation. The management system shall cover all the systems and processes necessary for the GH organisation to discharge its responsibilities.
- (b) The management system shall include:
- (1) clearly defined lines of accountability and responsibility throughout the organisation, including a direct accountability for safety of the senior management;
 - (2) a safety management system to include the following elements:
 - (i) a description of the overall philosophy and principles of the organisation with regard to safety, referred to as 'the safety policy', signed by the accountable manager;
 - (ii) a process to identify safety hazards, and to assess and mitigate the safety risks in ground handling activities, including the human factors;
 - (iii) means to verify the organisation's safety performance by establishing safety objectives, standards, and indicators, and to validate the proportionality and effectiveness of the mitigation measures in addressing the safety risks;
 - (iv) a process to analyse and improve safety performance;
 - (v) a process to promote safety within the organisation, with the purpose of fostering a safety culture. This shall include means to communicate on safety topics, so that personnel are aware of their role in maintaining ground and flight safety and in contributing to the safety culture;
 - (vi) identification of interfaces with other stakeholders, and the GH organisation's own safety accountability, authority and responsibility within those interfaces.
 - (3) a process to manage changes;
 - (4) methods to ensure minimum level of control to prevent fatigue to its personnel, considering the different GH functions and the associated safety risks of the assigned tasks;
 - (5) a training programme to ensure that personnel involved in the GH activities are competent to perform the safety-related duties and that they are familiarised with the rules and procedures relevant to their tasks;
 - (6) a process to monitor compliance of the GH organisation with the applicable requirements and regulations. Compliance monitoring shall include feedback on findings to the accountable manager to ensure effective implementation of corrective actions as necessary;
 - (7) a process to review the management system components for further improvement and update.
- (c) The GH organisation shall document all the key processes of the management system.

- (d) Notwithstanding points (a) to (c), if the GH organisation is part of a legal entity that holds one or more additional organisation certificates, approvals, or authorisations or declares its activity in accordance with Regulation (EU) 2018/1139 and its delegated and implementing acts, the GH organisation may integrate its management system with the management system required under the regulations already applicable for compliance with the conditions of that certificate, approval, authorisation or declaration, as the case may be.

Rationale

More AMC and GM will be added to help GH organisations identify whether they can be considered complex or non-complex organisations.

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

SENIOR MANAGEMENT

- (a) Senior management is usually a group consisting of the persons whose functions are performed at the highest level of management in the organisation, immediately below the board or directors.
- (b) Other terms used: executive management, higher management, management team.
- (c) For the purpose of this Regulation, senior management includes the accountable manager.
- (d) Small organisations may have a reduced structure for the senior management, where several functions can even be fulfilled by a single person.

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

SAFETY MANAGEMENT SYSTEM

Safety management seeks to proactively identify hazards and mitigate the related safety risks before they result in aviation accidents and incidents. Safety management enables an organisation to manage its activities in a more systematic and focused manner. When an organisation has a clear understanding of its role in, and contribution to, aviation safety, this enables the organisation to prioritise safety risks and more effectively manage its resources for optimal results.

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

It is important to recognise that safety management will be a continuous activity, as hazards, risks, as well as the effectiveness of safety risk mitigations, will change over time.

The safety management capability of an organisation should be commensurate with the safety risks to be managed, which can be at the service level or at the organisational level.

The risks that are inherent in a complex structure require a robust safety risk management process. Consequently, scalability and suitability of the safety management element should be a function of the inherent safety risk capability of the organisation. For instance, for organisations with a lower risk level:

- (a) the risk assessment model that is used may be very simple in cases in which the identified hazards are easy to mitigate;
- (b) expert judgement might be sufficient to measure the efficiency of safety barriers;
- (c) the collection of data, safety information, and occurrences might be very limited;
- (d) there might be no need for software or tools to manage the SMS; and
- (e) the communication policy might be limited.

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

GUIDANCE FOR SMALL ORGANISATIONS ON BUILDING AN SMS

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

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

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

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

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

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

HUMAN FACTORS AND SAFETY HAZARDS

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

- (a) The GH organisation should address the human factors as part of its SMS to optimise human performance within the system. This can be achieved by analysing the task, the individuals involved and the organisation, and how these can each impact safety behaviour.
- (b) The task or job should be designed with ergonomic principles taking into account typical human performance limitations, ensuring they are not overloaded and are able to carry out their tasks in all operational circumstances. The physical design of the workplace, its environment, the equipment and the mental abilities of the person to make decisions, as well as their perception of the task and risks, need to be considered.

- (c) Individuals have varying strengths and weaknesses related to their attitudes, skills and personalities.
- (d) An organisation’s culture and organisational attitudes can have considerable influence on individuals and group behaviour. A positive culture should be established, as this promotes employee involvement and commitment at all levels and highlights where deviations from safe working practices is not acceptable.
- (e) The ground handling environment still relies heavily on people. However, as technical systems become more reliable, the remaining occurrences are largely related to human error.
- (f) Human factors or operator error have been identified by industry as being responsible for over 90 per cent of accidents involving damage to aircraft and infrastructure. Common causes of such accidents have been highlighted as poor training and supervision, failure to follow standard operational procedures, distraction and work pressure. As part of its SMS, the GH organisation should identify and target root causes related to human factors and take appropriate mitigating actions.
- (g) The “Dirty Dozen”

There is a considerable amount of research and academic material on the subject of human factors. One commonly used concept is the “Dirty Dozen”. The Dirty Dozen refers to 12 of the most common human error preconditions or conditions that can act as precursors to accidents or incidents. These 12 elements influence people to make mistakes. Since its introduction for aircraft maintenance in 1993, all areas of the aviation industry have found the Dirty Dozen a useful introduction to discussions into human error within their businesses, organizations and workplaces.
- (h) While the Dirty Dozen has increased awareness of how humans can contribute towards accidents and incidents, the aim of the concept is to focus attention and resources on reducing and capturing human error. There are examples of typical countermeasures designed to reduce the possibility of any human error causing a problem for each element. These 12 elements can cause people to make mistakes; however, the list is not exhaustive as there are over 300 elements in the Human Factors Training Manual (Doc 9683).
- (i) The GH organisation should conduct an analysis of the human factors aspects of their operations and organization. The Dirty Dozen concept is an efficient and simple methodology to conduct this analysis. The 12 elements are shown in Figure 1 below (see also Appendix G to ICAO Doc 10121 Ground Handling Manual):

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

- (j) The GH organisation should be aware of the issues when employing temporary, seasonal or third-party temporary staff. Some examples are but not limited to:

- (1) maintaining training competency;
 - (2) inexperienced staff working unsupervised; and
 - (3) infrequent use of equipment and procedures.
- (k) The GH organisation should consider maintaining an appropriate balance between temporary workers and full-time employees within the operational teams to ensure sufficient levels of experience and competency.

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

SAFETY CULTURE

- (a) The GH organisation should ensure that its processes developed under its management system aim at fostering a safety culture within its organisation. This should include at least the following:
- (1) Staff are encouraged to report essential safety-related information. However, there is a clear line drawn between acceptable and unacceptable behaviour. This helps building accountability.
 - (2) continuous development of personnel's technical competences through training, to ensure that they understand why particular safety actions are taken and why safety procedures are introduced or changed; also, so that staff become competent to draw conclusions from safety information systems, and be willing to implement safety changes;
 - (3) open, consistent and transparent communication and information sharing among the GH personnel regarding safety aspects, horizontally among staff, and vertically (from management to front-line personnel and vice-versa);
 - (4) awareness of individual safety responsibility as part of a larger aviation system. Staff should become knowledgeable about various factors: human, technical and organisational, affecting the safety of the whole system;
 - (5) SMS training;
 - (6) training on safety data analysis and occurrence investigation to the personnel participating in such activities;
 - (7) communication sessions aiming at helping the GH personnel understand the main safety culture concepts and become aware of the following aspects:
 - (i) the importance of reporting,
 - (ii) the outcome of reporting (meaningful, visible result),
 - (iii) the potential safety consequences of not reporting,
 - (iv) the concept of just culture and reporter's protection,
 - (v) the difference between an inadvertent error/mistake/lapse and an intentional act/reckless conduct;
 - (vi) the importance of reporting errors on a voluntary basis and of sharing experiences;
 - (8) facilitation of safety reporting by using simple forms, easy to find, easy to fill in, easy to submit, and ensuring full anonymity. Consider the difficulty of reporting after/during a night shift, or a difficult shift (congested traffic, severe weather conditions, etc.). In

- unusual or emergency situations, staff can report directly to decision makers to allow a timely response. This builds flexibility and effectiveness of reporting;
- (9) allocating sufficient resources to analyse the safety events, to identify the root causes, to provide feedback to reporters, to create a hazard register based on which to establish safety performance indicators to measure the safety objectives;
 - (10) ensuring full management involvement and support into these activities;
 - (11) involving front-line GH personnel and staff representatives in the investigation of an event;
 - (12) involving front-line personnel in development of procedures and safety processes.
- (b) The implementation steps should cover the aspect of communication and information sharing both within the GH organisation and with the other stakeholders involved in operation at an aerodrome: aircraft operator, aerodrome operator, ATC, AMS provider, and others, as the case may be (e.g., contracted service providers relevant to the safety of operation).
- (c) Review process for effectiveness of safety culture (including understanding by personnel).

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

STEPS TOWARDS BUILDING AND MAINTAINING A SAFETY CULTURE

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

- (a) Communication on safety
 - (1) Encourage staff to identify hazards, ask them to suggest solutions. Use open-ended questions to encourage discussion instead of questions that require only a 'yes' or 'no' answer.
 - (2) Schedule debriefings of 10-15 min. at the end of a day/shift to discuss with the whole team about how the activity went on, what was noticeable, different, outside an operational procedure, positive and negative aspects, whether something should be changed. It is important to understand why people do things the way they do. Listening is also very important.
 - (3) Listen to staff's concerns, without being defensive. The purpose of a briefing is to have personnel start thinking about safety problems. Practical examples can be used in the talk.
 - (4) Include any feedback from past briefings and report on follow-up action.
 - (5) Ensure timely and effective dissemination of safety notices and safety information to all staff.
 - (6) Arrange a 'display wall' in the briefing room, to post questions to the personnel, asking them for their opinion about changing an operational procedure; or informing about new changes coming from the industry standards that they apply, or the regulator, or ICAO.
 - (7) Arrange competitions and games that aim at increasing awareness of safety or improving safety in the day-to-day activities.
 - (8) Share feedback on disseminated results of reported events on a regular basis, in both formal and informal discussions/meetings.

- (9) Formal and informal discussions about safety culture concepts, such as 'error', 'mistake', 'intentional', 'non-intentional error', 'negligence', 'wilful misconduct', 'gross negligence', examples of 'crossing the line between error and negligence', etc.
 - (10) Ongoing reviews of lessons learned from the organisation's own occurrence reports and safety surveys.
 - (11) Positive re-enforcement (praise/thanks for appropriate behaviour).
 - (12) Personalise safety outcomes (including health and safety).
- (b) Training
- (1) Annual training plans to ensure that personnel are aware of all safety management practices and procedures applicable to their role.
 - (2) Annual training plans to ensure that personnel are aware of their organisation's approach to safety.

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

GOOD PRACTICES IN BUILDING A SAFETY CULTURE

- (1) There should be opportunities for management and operational staff as well as staff representatives to engage to discuss operational risks and promote a positive safety culture.
- (2) The GH organisation's senior management should be aware of the top operational risks, "hotspots", and key safety objectives.
- (3) Frontline staff representatives should be involved in safety activities including hazard identification, procedures development, change management and safety risk management.
- (4) Senior management should be involved in safety culture promotion activities. One of the core safety culture messages to GH organisation staff is that by working safely and not taking risks, and by looking out for each other, everyone gets to go home safely at the end of the day.
- (5) It is recommended that all levels of management are trained on safety, including safety culture and just culture.
- (6) The GH organisation should undertake periodic assessments of safety culture.
- (7) The GH organisation should develop a plan to address gaps and deficiencies identified during the safety culture assessment.
- (8) Results of the safety culture assessments and action plans should be communicated throughout the organisation.
- (9) Staff should be empowered to stop an operation they feel is unsafe via a non-punitive reporting system.
- (10) Staff should always be given the equipment they need to work safely, and encouraged to use appropriate safety protective equipment (e.g. PPE, ear protection, high visibility jackets, etc.).
- (11) Staff should not feel pressure to come into work when unfit to do so.

- (12) Standard operating procedures should be developed together with the GH personnel and relevant stakeholders.
- (13) Staff should be enabled and encouraged to submit suggestions for improving processes and procedures to enhance safety.

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

SAFETY CULTURE AND JUST CULTURE

- (a) Just culture, as a component of the safety culture, operates with complex concepts. Therefore, it is important to consider the human factors in the way in which training to GH personnel is provided to ensure its effectiveness. For example, complex concepts should be explained in simple terms and by using concrete and relevant examples from daily operation.
- (b) It is good practice that the GH organisation develops a just culture policy (ideally, a standalone document) that is formally endorsed by top management and staff representatives.
- (c) The GH organisation could refer to the European Corporate Just Culture Declaration.

AMC1 ORGH.MGM.200(b)(4) Management system

CONSIDERATION OF FATIGUE IN PLANNING THE GROUND HANDLING ACTIVITIES

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

procedure, the organisation should perform a specific risk assessment and define additional mitigation actions, as applicable. Basic mitigations may include:

- (1) additional supervision;
- (2) use of additional rest breaks.

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

CONSIDERATION OF FATIGUE IN PLANNING GROUND HANDLING SHIFTS

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

- (a) Fatigue may be induced by:
 - (1) the environment and conditions in which the work is carried out (e.g. noise, rain, high or low temperature, closed space, lifting/moving heavy items, working in uncomfortable positions e.g. in bending position, on knees, etc.);
 - (2) excessive hours of duty and shift working, particularly with multiple shift periods or patterns, additional overtime or night work.
- (b) Considering the threat of fatigue in the planning and organising of shifts refers to setting up the activities and the shifts in a way that enables the GH personnel to remain sufficiently free from fatigue so they can perform the planned activities safely, including:
 - (1) providing rest periods of sufficient time to overcome the effects of the previous shift and to be rested by the start of the following shift;
 - (2) avoiding shift patterns that cause a serious disruption of an established sleep/work pattern, such as alternating day/night duties;
 - (3) planning recurrent extended rest periods and notifying the staff sufficiently in advance.
- (c) Guidance on fatigue management can be found in the ICAO Manual for the Oversight of Fatigue Management Approaches (Doc 9966).

AMC1 ORGH.MGM.200(b)(7) Management system

COMPLIANCE MONITORING – INTERNAL AUDITS

- (a) Compliance monitoring process
 - (1) The implementation and use of a compliance monitoring process should enable the GH organisation to monitor its compliance with the requirements of Annexes III and IV to this Regulation, as well as with any other applicable regulatory requirements.
 - (2) The compliance monitoring process should be properly implemented, maintained and continually reviewed and improved, as necessary.
 - (3) Compliance monitoring should include a method to feed findings back to the accountable manager to ensure the effective implementation of corrective actions, as necessary, and the compliance monitoring process is reviewed and improved.

-
- (4) The GH organisation should monitor the consistent application of its operational procedures and compliance with the applicable procedures of the aircraft operators to which it provides services and the aerodrome operator of the aerodromes where it operates, to ensure that the activities are performed safely. In doing so, the GH organisation should, as a minimum, and where appropriate, monitor compliance with:
- (i) its declaration;
 - (ii) its SMS;
 - (iii) its documents and records system;
 - (iv) the training standards;
 - (v) the GSE maintenance programme;
 - (vi) the activities of the organisation carried out under the supervision of the person(s) nominated in accordance with point ORGH.MGM.210(b)(3);
 - (vii) any outsourced activities in accordance with ORGH.MGM.205, for compliance with the contract.
- (b) Organisational set-up – compliance monitoring function
- (1) To ensure that the GH organisation continues to meet the requirements of this Annex and Annex IV to this Regulation, the accountable manager should designate a compliance monitoring manager. The compliance monitoring manager should be responsible to ensure that the compliance-monitoring process is properly and consistently implemented and continued compliance with the applicable regulatory requirements is ensured.
 - (2) If more than one person is designated for the compliance monitoring function, the accountable manager should identify the person who acts as the unique focal point (i.e., the 'compliance monitoring manager').
 - (3) The compliance monitoring manager should:
 - (i) have direct access to the accountable manager;
 - (ii) be able to demonstrate relevant knowledge, background and appropriate experience in GH operations and knowledge and experience in compliance monitoring;
 - (iii) have knowledge of the applicable requirements in the GH domain; and
 - (iv) have access to all parts of the GH organisation and, as necessary, any contracted service provider.
 - (4) In a small GH organisation, this function may be executed by the accountable manager if the accountable manager has demonstrated to have the necessary competence as defined in points (b)(3)(ii) and (iii).
 - (5) If the same person acts as compliance monitoring manager and as safety manager, the accountable manager, with regards to their direct accountability for safety, should ensure that sufficient resources are allocated to both functions, considering the size of the organisation and the complexity of its activities.
 - (6) 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.
- (c) Compliance-monitoring documentation

- (1) Relevant documentation should include the relevant part(s) of the GH organisation's management system documentation.
- (2) In addition, relevant documentation should also include the following:
 - (i) terminology;
 - (ii) specified activity standards;
 - (iii) a description of the organisation;
 - (iv) the allocation of duties and responsibilities;
 - (v) procedures to ensure regulatory compliance;
 - (vi) the compliance monitoring programme, reflecting:
 - (A) the schedule of the monitoring programme;
 - (B) audit and inspection procedures including an audit plan that is implemented, maintained, and continually reviewed and improved;
 - (C) reporting procedures;
 - (D) route-cause analysis for the findings identified during internal compliance-monitoring activities;
 - (E) follow-up and corrective action procedures; and
 - (F) the recording system.
 - (vii) the training syllabus referred to in (e)(2);
 - (viii) document control.
- (d) Training
 - (1) Proper and thorough training is essential to optimise compliance. To achieve optimum outcome of such training, the GH organisation should ensure that all personnel understand the training objectives as laid down in the organisation's management system documentation.
 - (2) The persons responsible for the compliance monitoring function should receive training in this function. Such training should cover the compliance-monitoring requirements, the manuals and procedures related to the tasks, audit techniques, root-cause analysis, reporting, and recording.
 - (3) The allocation of time and resources should be based on the volume and complexity of the activities concerned.
- (e) Compliance monitoring – audit scheduling
 - (1) The GH organisation should establish audit schedules to be completed during a specified period, as well as a periodic review cycle for each audited area. The compliance monitoring itself should also be audited according to a defined audit schedule. The schedule should allow for unscheduled audits when non-compliance data shows an increasing trend. Follow-up audits should be scheduled to verify that corrective action has been carried out, and that it has been effective and completed, in accordance with the policies and procedures specified in the GOM.
 - (2) The management system's key processes, procedures and the operation of the GH organisation should be audited within the first 12 months from the date on which 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.

AMC2 ORGH.MGM.200(b)(7) Management system

ANNUAL ACTIVITY REPORT AND INTERNAL REVIEW TO THE COMPETENT AUTHORITY

The annual activity report and internal review submitted by the GH organisation to its competent authority for the purpose of point ARGH.OVS.305(g) should contain the following information:

- (a) Number of aircraft operators serviced in a year at EU aerodromes in the scope of Regulation (EU) 2018/1139;
- (b) Number of aerodromes in the scope where the GH organisation provides services - increase or decrease of this number;
- (c) GH services added or cancelled per aerodromes;
- (d) Number of safety reports received within its organisation and occurrence reports submitted to the competent authority; GH activity being subject to reporting;
- (e) Staff turnover (percentage or number), of which turnover of management personnel;
- (f) GSE maintenance programme updates or significant issues;
- (g) Training of GH personnel (how many training sessions for newcomers, recurrent, which GH functions);
- (h) Audits performed by industry third parties and the results;
- (i) Audits performed by itself as part of the compliance monitoring function and the results.

Rationale

This AMC is proposed to support the competent authority in building the basis for a risk-based oversight. It also enables a better assessment of the GH organisation's safety performance, its risk exposure and maturity. A clear picture of an organisation's safety performance with positive assessment by the competent authority could lead to a maximum extended oversight cycle.

AMC3 ORGH.MGM.200(b)(7) Management system

COMPLIANCE MONITORING FUNCTION AS A CONTRACTED ACTIVITY

- (a) The GH organisation may perform internal audits within the compliance monitoring function either using its own personnel or a third-party auditor. When using the auditing services of a third-party service provider to verify its compliance with specific requirements of the GH regulation, the GH organisation should comply with the requirements of ORGH.GEN.205 for contracted services.

- (b) The responsibility for the compliance monitoring function of the organisation remains with the GH organisation at all times, including when some audits are performed by a third-party auditor.

AMC1 ORGH.MGM.200(b)(6); (b)(7) Management system

COMPLIANCE MONITORING OF THE TRAINING PROGRAMME

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

- (a) The training and assessment plans are relevant to the work in the specific context and environment to which they may be assigned after training;
- (b) The programme enables the trainees to achieve the interim and final competency standards; and
- (c) Remedial actions are taken if in-training and post-training evaluation indicates evident criteria to do so.

AMC1 ORGH.MGM.200(d) Management system

INTEGRATED MANAGEMENT SYSTEM

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

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

GM1 ORGH.MGM.200(d) Management system

INTEGRATED MANAGEMENT SYSTEM

- (a) Organisations should embed safety management and risk-based decision-making into all their activities, instead of superimposing another system onto their existing management system and governance structure. In addition, if the organisation holds multiple organisation certificates that are issued under Regulation (EU) 2018/1139, it may choose to implement a single management system to cover all of its activities. An integrated management system may be used not only to capture multiple management system requirements resulting from Regulation (EU) 2018/1139, but also to cover for other regulatory provisions requiring compliance with ICAO Annex 19 or for other business management systems, such as security, occupational

health, and environmental management systems. Integration will remove duplication and exploit synergies by managing safety risks across multiple activities. Organisations may determine the best means to structure their management systems to suit their business and organisational needs.

- (b) Aerodrome operators providing GH services, aircraft operators performing self-handling are not expected to duplicate their already existing management systems for compliance with this Regulation.
- (c) Those organisations should only revise their existing management system to cover the new elements required by this Regulation, in particular:
 - (1) safety policy and the safety risk management process,
 - (2) compliance monitoring function,
 - (3) duties and responsibilities of the GH personnel,
 - (4) interfaces with the other activities performed by the organisation,
 - (5) the training programme of the personnel performing GH activities,
 - (6) ground handling processes and procedures,
 - (7) documents and records,
 - (8) the policy on the management of changes,
 - (9) the maintenance programme for the GSE.

ORGH.MGM.201 Information security management system

The GH organisation shall establish, implement and maintain an information security management system in accordance with the Annex (Part-IS.D.OR) to Delegated Regulation (EU) 2022/1645⁴ in order to ensure the proper management of information security risks which may have an impact on aviation safety.

ORGH.MGM.205 Contracted services

- (a) When the GH organisation contracts, for the purpose of its operation or compliance with this Regulation, services or products that are not certified, approved, authorised or covered by a declaration in accordance with Regulation (EU) 2018/1139 and its delegated and implementing acts, those services or products shall be provided under the management system of the GH organisation.
- (b) The GH organisation, as a contractor, shall ensure the following:

⁴ [Commission Delegated Regulation \(EU\) 2022/1645](#) of 14 July 2022 laying down rules for the application of Regulation (EU) 2018/1139 of the European Parliament and of the Council, as regards requirements for the management of information security risks with a potential impact on aviation safety for organisations covered by Commission Regulations (EU) No 748/2012 and (EU) No 139/2014 and amending Commission Regulations (EU) No 748/2012 and (EU) No 139/2014 (OJ L 248, 26.9.2022, p. 18).

- (1) the contracted services or products comply with the applicable requirements, depending on the type of service or product;
 - (2) any aviation safety hazards associated with the contracted services or products are risk-assessed within its own management system;
 - (3) the competent authority is enabled access to the third-party provider, to determine continued compliance with the applicable requirements;
 - (4) any such contract is documented.
- (c) When the GH organisation contracts services or products that are certified, authorised, approved or declared in accordance with Regulation (EU) 2018/1139 and its delegated and implementing acts, the contracted organisation providing those services or products shall be responsible for their safety, in compliance with the regulation applicable to that organisation and the relevant requirements of this Regulation.

AMC1 ORGH.MGM.205 Contracted services

RESPONSIBILITIES WHEN CONTRACTING SERVICES

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

GM1 ORGH.MGM.205 Contracted services

THIRD-PARTY SERVICE PROVIDER

- (a) It is recommended that the GH organisation 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 safety of its own operation.
- (b) If the contracted service is a GH service as identified in Article 1 of this Regulation, then the provider of those services is bound to comply with this Regulation.

AMC2 ORGH.MGM.205 Contracted services

AUDITS PERFORMED BY A THIRD-PARTY AUDITOR

- (a) The GH organisation may contract a third-party service provider to perform its internal audits to verify its own compliance with the regulation and also the compliance of its contracted organisations. In such a case, the GH organisation should ensure the following:
- (1) a documented arrangement has been established with the third-party auditor;
 - (2) the audit standards applied by the third-party auditor address the scope of this Regulation in sufficient detail;
 - (3) the audit applies an evaluation system designed to assess the operational, management and control systems of the GH organisation;
 - (4) the third-party auditor and its evaluation system are independent, and the auditors are impartial;
 - (5) the auditors are appropriately qualified and have sufficient knowledge, experience and training, including on-the-job training, to perform their allocated tasks;
 - (6) audits are performed on-site;
 - (7) access of the third-party auditor to the relevant data and facilities is granted to the level of detail necessary to verify compliance with the applicable requirements;
 - (8) the GH organisation is granted access to the full audit report;
 - (9) procedures have been established for monitoring continued compliance of the organisation with the applicable requirements; and
 - (10) procedures have been established to notify the GH organisation of any non-compliance with the applicable requirements, the corrective actions to be taken, the follow-up of these corrective actions, and closure of findings.
- (b) The full audit report of the third-party provider should be made available to the competent authority upon request.

ORGH.MGM.210 Personnel

- (a) The GH organisation shall appoint an accountable manager. This person shall:
- (1) be accountable for the safe provision of GH services;
 - (2) have the authority to ensure that all activities can be financed and carried out in accordance with this Regulation;
 - (3) be responsible for establishing and maintaining an effective management system.
- (b) The GH organisation shall nominate persons for the following functions:
- (1) The organisation's safety management. This nominated person shall be responsible for the development, maintenance and day-to-day management of the safety management system. That person shall act independently of other managers within the organisation, shall have direct access to the accountable manager and to other management personnel, as relevant for the safety of operation, and shall report to the accountable manager.

- (2) The organisation's GH training. This nominated person shall be responsible for the development and implementation of the training and assessment programme and continued competence of the personnel involved in GH activities. That person shall have direct access to the accountable manager and to the appropriate management for training matters.
 - (3) The organisation's GH operations. This nominated person shall be responsible for the coordination and safety performance of all GH activities at all aerodromes or regionally, as established by the GH organisation and described in its standards in accordance with ORGH.GEN.110. That person shall have direct access to the accountable manager and to the appropriate management for operational matters.
 - (4) If applicable, the organisation's cargo operations. This nominated person shall be responsible for the coordination and safety performance of all cargo operations at all aerodromes or regionally, as established by the GH organisation and described in its standards in accordance with ORGH.GEN.110.
- (c) In addition, the GH organisation shall establish the following functions:
- (1) A function for the management of safety performance at each aerodrome where it provides services. This function shall report to the nominated persons for the organisation's safety management and operations, as determined by the GH organisation and clarified in its GOM. This function may include one or more persons, responsible for one or more aerodromes.
 - (2) A function responsible for the operation and maintenance of the ground support equipment (GSE). The GH organisation shall determine the reporting lines for this function. It may include one or more persons.
 - (3) A proportionate number of GH supervisory functions, considering the structure of the organisation and the number of personnel employed.
 - (i) Their duties and responsibilities shall be well defined, and any other arrangements shall be made to ensure that they can discharge their supervisory responsibilities.
 - (ii) The personnel supervision function shall be exercised by competent individuals with the skills to ensure the performance of GH activities as per the organisation's standards specified in the GOM;
- (d) Without prejudice to points (b) and (c), in small organisations, the same person may fulfil more than one function or role if they are trained and qualified to perform the assigned tasks and any conflict of interest in performing the assigned tasks has been addressed before taking up those functions.
- (e) The GH organisation shall have sufficient and qualified personnel for the planned operation, to provide the GH services in accordance with this Regulation.

Stakeholders are invited to comment on whether there should be a nominated person for safety management (point (b)(1) above), considering that this is different from the requirements in the Air Operations and Aerodrome Regulations.

AMC1 ORGH.MGM.210(a)(2) Personnel

SAFETY MANAGEMENT FUNCTIONS

- (a) The functions of the safety manager should be to:
- (1) act as a focal point for the safety aspects of the GH activities, as per ICAO Doc 9859 (Ch. 9.3.6);
 - (2) monitor safety concerns in aviation industry;
 - (3) coordinates and communicates with the competent authority;
 - (4) facilitate hazard identification, risk analysis and management;
 - (5) monitor and manage the implementation of actions taken to mitigate risks, as listed in the safety action plan;
 - (6) provide periodic reports on safety performance;
 - (7) ensure maintenance of safety management documentation;
 - (8) ensure that there is safety management training available and that it meets acceptable standards;
 - (9) provide independent advice on safety matters;
 - (10) ensure initiation and follow-up of internal occurrence investigations;
 - (11) if more than one person, depending on the size of the organisation and scale of operations, this function may have more than one person to support the performance of all safety management related tasks;
 - (12) assess the risks related to changes affecting the main elements of the declaration.
- (b) The safety management function should be independent from the operational line management.

AMC2 ORGH.MGM.210(a)(2) Management system

SAFETY MANAGER TRAINING, SKILLS AND QUALIFICATIONS

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

- (a) any of the GH operations listed in Article 2 of the GH Regulation
- (b) human factors
- (c) SMS:
 - (1) Monitoring safety performance
 - (2) Conducting risk assessments
 - (3) Managing the safety information database (system)
 - (4) Investigation of reportable matters and hazardous events
 - (5) Safety promotion/communication methods

- (d) Soft skills, computer literacy
 - (1) Communication skills
 - (2) Computer skills (word-processing, spreadsheets, database management)

ORGH.MGM.215 Facilities

- (a) The GH organisation shall ensure availability of facilities allowing the performance and management of all planned tasks and activities in accordance with the applicable requirements.
- (b) Where the GH organisation uses a warehouse at the premises of an aerodrome within the scope of Regulation (EU) 2018/1139 to store and prepare cargo items containing dangerous goods, the warehouse facility shall be compliant with the requirements of ICAO Annex 18 and the Technical Instructions.

ORGH.MGM.230 Emergency response procedures

- (a) As part of its safety management system, the GH organisation shall implement procedures for emergency response, to support the aircraft operators to which it provides services, in accordance with the contractual terms.
- (b) Notwithstanding point (a), the GH organisation shall apply the emergency response procedures of the aerodrome operator applicable to the aerodrome users. It shall also participate in the aerodrome emergency response drills and exercises, as requested by the aerodrome operator.
- (c) The GH organisation shall ensure its personnel receive training in emergency response, adequate to their responsibilities in providing support to the aircraft operators.

ORGH.MGM.235 Software equipment

The GH organisation shall ensure that the software it uses for the provision of GH services does not negatively affect the safety of the flight. It shall ensure the following:

- (a) A back-up system to ensure operational continuity is available and functional in case of breakdown.
- (b) The data are easily accessible and retrievable upon request by authorised persons.
- (c) If the software includes document issuance, comply with the relevant parts of point ORGH.DOC.100.
- (d) Personnel are trained and competent to use the software to perform their assigned tasks.
- (e) The system is secured against unauthorised access.
- (f) The software is fully functional following software updates.

GM1 ORGH.MGM.235 Software equipment

SOFTWARE EQUIPMENT

Any of the software equipment is in the scope if it endangers the safety of a flight in case of malfunction. The list is not exhaustive:

- (a) a computerised departure control system (DCS), including load planning functions,
- (b) a safety programme for driving of automatic vehicles on the apron,
- (c) a software for ground supervision services,
- (d) any computerised tools for baggage and cargo sorting, processing/preparing for loading,
- (e) computerised software for processing and documenting a dangerous goods transport;
- (f) any other operational software used by the GH organisation for the provision of GH services.

GM1 ORGH.MGM.235(b) Software equipment

AUTHORISED PERSONS

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

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

SUBPART DEC — DECLARATION (ORGH.DEC)

ORGH.DEC.100 Declaration

- (a) The GH organisation shall submit a duly filled declaration, including the annex for each aerodrome where it provides services, to the competent authority as identified in point ORGH.GEN.105. It shall submit the following documents to the competent authority, preferably in an electronic format, within a timeframe commonly agreed with the competent authority after submitting the declaration and any updates in due time before an oversight inspection or audit by the competent authority:
 - (1) a list of the alternative means of compliance used for the ground handling activities;
 - (2) the ground operations manual (GOM).
- (b) If the GH organisation applies any of the following changes affecting the content of the declaration, it shall notify the competent authority of those changes and submit an amended declaration:
 - (1) the name of the organisation;
 - (2) the accountable manager – name and contact details;
 - (3) adding or removing aerodromes where it provides GH services;
 - (4) adding or removing GH services provided at an aerodrome listed in the declaration;
 - (5) new AltMoC;
 - (6) implementation of an industry standard.
- (c) The GH organisation shall maintain compliance with the applicable requirements and with the information provided in the declaration.

AMC1 ORGH.DEC.100 Declaration

SUBMITTING A DECLARATION

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

GM1 ORGH.DEC.100 Declaration

GROUND OPERATIONS MANUAL (GOM)

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

GM2 ORGH.DEC.100 Declaration

GENERAL

The intent of a declaration is to:

- (a) Have the GH organisation acknowledge its responsibilities under the applicable safety regulations and that it holds all necessary authorisations that may be required by local or national authorities for compliance with other applicable requirements (e.g., Council Directive 96/67/EC applicable at some EU aerodromes);
- (b) Inform the competent authority of the existence of a GH organisation; and
- (c) Enable the competent authority to fulfil its oversight responsibilities in accordance with ARGH.GEN.300 and 305.

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

If a GH organisation intends to permanently cease the provision of the ground handling service at an aerodrome, it shall:

- (a) notify the aerodrome operator and the competent authority as soon as possible, as well as the impacted aircraft operators as per the agreement;
- (b) submit to the competent authority a request for de-registration of the declaration, upon the date of termination of the provision of the services.

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

NOTIFICATION

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

Appendix 1 - Declaration

DECLARATION		
in accordance with Commission Regulation (EU) xxxx/xxx on the provision of ground handling services		
Name of organisation:		
Name, email and telephone number of the accountable manager:		
Organisation's principal place of business:		
Provision of GH services:		
To third-party aircraft operators <input type="checkbox"/> Self-handling <input type="checkbox"/>		
Name, email and telephone number of the nominated person for GH safety:		
Intended date of starting GH operation ^(*) :		
(*) : For GH organisations already operating at the date of application of the GH Regulation, this date shall indicate the date at which the declaration is submitted.		
EU aerodrome(s) at which the GH organisation provides services, in full name and ICAO code:		
N°	Airport name (ICAO code)	State (land, if applicable)
1	<i>e.g., Konrad-Adenauer Cologne Bonn (EDDK)</i>	<i>Germany (NW)</i>
2	<i>e.g., Frankfurt-am-Main (EDDF)</i>	<i>Germany (HE)</i>
3	<i>e.g., Frankfurt-Hahn (EDFH)</i>	<i>Germany (HE)</i>
4	<i>e.g., Charles de Gaulle Paris (LFPG)</i>	<i>France</i>
5		
Statements		
<input type="checkbox"/> The GH organisation has developed and is implementing a safety policy and procedures during the provision of GH service(s) covered by this declaration, in accordance with point ORGH.MGM.200 Management system.		
<input type="checkbox"/> Where applicable, the alternative means of compliance with references to the associated AMCs they replace (attach AltMoC) have been submitted to the competent authority.		

<input type="checkbox"/> The management system complies with the essential requirements set out in Annex VII to Regulation (EU) 2018/1139 and laid down in Annex III (Part-ORGH) to Regulation (EU) XX on ground handling and ensures management of safety risks.			
<input type="checkbox"/> The GH services are carried out in accordance with the ground operations manual (GOM) established as set out in the essential requirements of Annex VII to Regulation (EU) 2018/1139 and as required by ORGH.DOC.110 of Annex III to Regulation (EU) XX on GH.			
<input type="checkbox"/> (If applicable) The apron management services are carried out in accordance with the applicable requirements of Annex VII to Regulation (EU) 2018/1139, Annex III (Part-ADR.OR) and Annex IV (Part-ADR.OPS) to Regulation (EU) No 139/2014.			
<input type="checkbox"/> All ground support equipment used are current with the maintenance programme as specified in Subpart ORGH.GSE of Annex III to Regulation XX on GH.			
<input type="checkbox"/> All GH personnel are trained in accordance with Annex III Subpart ORGH.TRG to Regulation XX on GH and their competences are maintained to perform their tasks safely and according to the standards established by the GH organisation.			
<input type="checkbox"/> The GH organisation complies and will continue to comply with the occurrence reporting obligations as set out in the essential requirements of Annex VII to Regulation (EU) 2018/1139 and Regulation (EU) 376/2014 and their delegated and implementing acts.			
<input type="checkbox"/> (If applicable) The GH organisation implements industry standards and good practices for compliance with the GH Regulation. <table border="1" style="width: 100%; margin-top: 10px;"> <tr> <td style="padding: 5px;">Name of the industry standards / good practices:</td> </tr> <tr> <td style="height: 20px;"> </td> </tr> <tr> <td style="height: 20px;"> </td> </tr> </table>	Name of the industry standards / good practices:		
Name of the industry standards / good practices:			
<input type="checkbox"/> The GH organisation will notify the competent authority of any changes to its organisation, the components of its management system, and its operation as hereby declared and as required by point ORGH.DEC.100 of Regulation (EU) XX on GH.			
<input type="checkbox"/> (If applicable) The GH organisation confirms that all the necessary arrangements with the aerodrome operator(s) of intended service have been duly made in advance of starting operation.			
<input type="checkbox"/> The GH organisation confirms that the information disclosed in this declaration, including all Annexes, is correct.			
Date, name and signature of the accountable manager: <div style="border: 1px solid black; height: 40px; margin-top: 5px;"></div>			

Annex to the Declaration*

(*): to be filled individually for each aerodrome where the organisation provides GH services under this declaration

<p>Annex n° XXX to the Declaration for⁽¹⁾ ⁽²⁾</p>	
<p><i>Notes:</i> (1): aerodrome name in full (2): ICAO code</p>	
<p>Name, email and telephone number of the representative of the GH organisation at the aerodrome this Annex refers to: </p> <p>Name, email and telephone number of the person responsible for the safety management at the aerodrome this Annex refers to*: </p> <p><i>Note: The same person may be responsible for more than one aerodrome.</i></p>	
<p>Starting date of operation at this aerodrome*: </p> <p>(*: if the organisation already provides services at this aerodrome at the date when the GH Regulation becomes applicable, this date shall indicate the date when the declaration is submitted.)</p>	
<p>List of GH services provided at the aerodrome covered by this Annex (as per Article 2(2) of Regulation (EU) XX on GH)</p>	
Passenger handling (point (a)):	<input type="checkbox"/>
Handling of passengers with reduced mobility (point (a)):	<input type="checkbox"/>
Baggage handling (point (b)):	<input type="checkbox"/>
<p>Aircraft handling and turnaround activities</p>	
Provision and operation of GSE and other vehicles (pt. (c)(i)):	<input type="checkbox"/>
Aircraft refuelling and defueling, including fuel valve setting (pt. (c)(ii)):	<input type="checkbox"/>
Aircraft toilet servicing (pt. (c)(iii)):	<input type="checkbox"/>

Aircraft potable water servicing (pt. (c)(iv)):	<input type="checkbox"/>
Catering loading (pt. (c)(v)):	<input type="checkbox"/>
Aircraft exterior cleaning (pt. (c)(vi)):	<input type="checkbox"/>
Aircraft de-icing/anti-icing (pt. (c)(vii)):	<input type="checkbox"/>
Aircraft arrival activities (pt. (c)(viii)):	<input type="checkbox"/>
Aircraft loading/unloading, loading supervision (pt. (c)(ix)):	<input type="checkbox"/>
Aircraft departure activities (pt. (c)(x)):	<input type="checkbox"/>
Aircraft towing/pushback (pt. (c)(xi)):	<input type="checkbox"/>
Cargo and mail handling (pt. (d)):	<input type="checkbox"/>
Acceptance, handling, segregation, and storage of dangerous goods (point (d)(i)):	<input type="checkbox"/>
Final build-up and storage of unit load device (ULD) (point d)(ii)):	<input type="checkbox"/>
Final cargo checks before air transportation (point d)(iii))	<input type="checkbox"/>
Ground transportation of cargo and mail between the point of final checks and the aircraft (point d)(iv))	<input type="checkbox"/>
<i>Only for GH organisations:</i> Ground supervision (point (e)):	<input type="checkbox"/>
Apron management service in accordance with Regulation (EU) 139/2014 (Article 3(1))	<input type="checkbox"/>

SUBPART DOC — DOCUMENTS AND RECORDS (ORGH.DOC)

ORGH.DOC.100 Documents and records

- (a) The GH organisation shall establish a documents-and-records system as part of its management system.
- (b) The GH organisation shall ensure that all documents and records are accessible to personnel requiring them for duty purposes or by authorities, whenever needed. The records shall be easily traced and retrievable throughout the required retention period.
- (c) The documents and records shall be stored and secured so as to ensure protection from damage, alteration and theft.
- (d) The documents and records shall be easily legible in any format they may be. The GH organisation shall specify the format of the documents and records, the storage, as well as the method of their disposal or deletion in its documentation.
- (e) The GH organisation shall make available the documents and records requested by the competent authority for inspection or audit purposes, as well as any associated amendments.

AMC1 ORGH.DOC.100 Documents and records

GENERAL

- (a) Documents and records may be kept in paper or electronic format, or a combination of both.
- (b) Documents and records in paper format should withstand normal handling and filing. Computer systems should have at least one backup system that is updated within 24 hours of any new entry.
- (c) In case of changes to hardware or software of records, the GH organisation should ensure that all necessary data continues to be accessible at least through the full period specified in ORGH.DOC.105.
- (d) The retention period for records starts when the record has been created or last amended.

GM1 ORGH.DOC.100 Documents and records

DATA BACKUP

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

ORGH.DOC.105 Record keeping

- (a) Records shall be kept for a minimum of three years (36 months) or in accordance with the national requirements of the State(s) where the GH organisation provides its services, whichever is longer.

- (b) Notwithstanding point (a), the following records shall be kept as follows or in accordance with other applicable requirements, whichever is longer:
- (1) the GH organisation's declaration and the alternative means of compliance in use, for the lifespan of the declaration;
 - (2) written arrangements with other organisations for the purpose of safe provision of GH services, for as long as such arrangements are in effect;
 - (3) GOM and procedures, for as long as they are used by the GH organisation at that station and the aircraft operator instructions and procedures of that particular aircraft operator;
 - (4) safety assessment reports including accident and serious incident investigation reports, for the lifetime of the system, procedure or activity;
 - (5) personnel training, qualifications, and, as applicable, medical records, driving on the apron authorisation or its revocation or cancellation, for at least 2 years after the end of a person's employment;
 - (7) vehicle and GSE authorisations, preventive maintenance plan, and maintenance records, for at least 2 years after a vehicle is removed from operation.

ORGH.DOC.110 Ground operations manual (GOM)

- (a) The GH organisation shall establish a ground operations manual (GOM) to include the following elements:
- (1) all necessary instructions, information and procedures for the services provided, adapted to the operational and local context and the safety risk at each aerodrome;
 - (2) the operational procedures provided by the aircraft operators to which it provides services;
 - (3) the aerodrome procedures provided by the aerodrome operator, to ensure compliance with the aerodrome requirements applicable to the GH organisation;
 - (4) standards for the duties and clear responsibilities of the GH personnel;
 - (5) the GH organisation's management system;
 - (6) the organisation's process for the management of changes;
 - (7) the training programme of its GH personnel;
 - (8) the GSE maintenance programme; and
 - (9) any other tasks within the scope of GH services mentioned in its declaration.
- (b) The GOM may be understood as a set of manuals and documents that may be issued in separate parts, interlinked by cross-references.
- (c) Aerodrome operators and aircraft operators performing GH services may integrate the new GH elements for compliance with this Regulation in their existing manuals.
- (d) The GH organisation shall ensure that any information taken from other relevant controlled documents, and any amendment thereof, is correctly and timely reflected in the GOM.
- (e) The GH organisation shall ensure that the GOM:

- (1) is approved and signed by the responsible person(s) assigned by the GH organisation, either in full or per parts;
 - (2) is easy to read and is organised in a manner that facilitates its preparation, use and revision.
- (f) The GH organisation shall:
- (1) review the content of the manual, ensure that it is up to date and amended whenever necessary;
 - (2) ensure that the procedures for amending and distribution of the GOM are communicated to, and understood by the responsible personnel;
 - (3) develop and implement a process to manage and control the GOM versions and make it visible in the manual;
 - (4) remove or clearly mark the obsolete parts;
 - (5) incorporate all amendments and revisions required by the competent authority or by changes to its operation; and
 - (6) disseminate operational instructions and changes thereof, as well as any other relevant information without delay to the personnel concerned.
- (g) The GH organisation shall ensure the following:
- (1) the GOM is easily accessible to its personnel and third-party organisations, either in full or parts thereof, as relevant to their tasks and responsibilities, and the personnel are instructed on how to access and where to find the parts relevant to them;
 - (2) the work instructions and operational procedures match the relevant parts of the GOM and are written or communicated in a language and manner that can be understood by the relevant personnel.
 - (3) the GOM and its latest amendments are available to the competent authority in due time before an inspection or audit.

GM1 ORGH.DOC.110 Ground operations manual (GOM)

GROUND OPERATIONS MANUAL (GOM)

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

incorporate the GH specific elements. The organisation can decide how to organise its manual, whether it intends to have a single manual to include all procedures and mandatory elements of all the organisations included in its management system or issue separate parts for each of them.

GM2 ORGH.DOC.110 Ground operations manual (GOM)

ACCEPTABLE CONDITION OF A GOM

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

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

AMC1 ORGH.DOC.110 Ground operations manual (GOM)

GENERAL

- (a) The GOM or parts of it may be presented in any form, including electronic form. In all cases, the GH organisation should ensure the manual is accessible, usable, and reliable.
- (b) The GOM should be such that:
 - (1) all parts of the manual are consistent and compatible in form and content;
 - (2) the manual can be easily revised;
 - (3) the content and revision status of the manual is controlled and clearly indicated.
- (c) The GOM should include a description of its amendment and revision process specifying:
 - (1) the person(s) who may approve amendments or revisions;
 - (2) the conditions for temporary revisions and/or immediate amendments, or revision required in the interest of safety; and
 - (3) the methods by which all personnel and organisations, including the service providers contracted by the GH organisation and performing GH tasks, are advised of changes to the manual.
- (d) The GOM content may be based on, or refer to, industry standards.

- (e) The GOM may contain parts of, or refer to, other relevant controlled documents. If the GH organisation chooses to do use material from another source in its GOM, either the applicable material should be copied and included directly in the relevant part of the GOM, or the GOM should contain a reference to the appropriate section of that applicable material.
- (f) A translated version of the relevant parts of the GOM is an accepted means to comply with the related relevant requirements. In any case, the persons who will use the manual or its translated parts should be able to read and understand them. The GH organisation should ensure that the translated version is always the most recent version of that document.

AMC2 ORGH.DOC.110 Ground operations manual (GOM)

CONTENT

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

- (3) Standard operational procedures and other guidance or instructions, per type of GH service provided, including:
 - 3.1 procedures and instructions of the GH organisation,
 - 3.2 procedures and instructions of the aerodrome operator,
 - 3.3 procedures and instructions of the aircraft operator(s),
 - 3.4 airside safety.
 - (4) GSE
 - 4.1 Operation of GSE including safety elements,
 - 4.2 Maintenance programme,
 - 4.3 Maintenance and repair instructions,
 - 4.4 Servicing information, troubleshooting and inspection procedures
 - (5) Dangerous goods instructions per each category of personnel involved in the handling of dangerous goods
 - (6) Security procedures
- (b) The standard operational procedures mentioned in point 3 of the GOM should cover the following GH operations, as applicable for the services provided by the GH organisation:
- 1. Passenger handling
 - 2. Baggage handling
 - 3. Aircraft servicing and GSE operations
 - 3.1 Ramp safety and operation of GSE
 - 3.2 Aircraft refuelling and defueling
 - 3.3 Hand signals
 - 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
 - 3.9 Handling spillage at the aircraft
 - 4. Aircraft handling and turnaround activities
 - 4.1 Aircraft arrival
 - 4.2 Aircraft chocking
 - 4.3 Aircraft coning
 - 4.4 Aircraft doors
 - 4.5 Aircraft loading and unloading
 - 4.6 Aircraft departure
 - 4.7 Aircraft pushback

- 4.8 Aircraft towing
 - 4.9 Aircraft long-term parking
 - 5. Load control
 - 5.1 Tasks and responsibilities
 - 5.2 Load control process
 - 5.3 Messages and communications
 - 5.4 Operational procedures
 - 6. Ground supervision function
 - 7. Cargo handling
- (c) The interfaces with the aerodrome operator and the aircraft operator should be highlighted in each section where they are developed.

GM1 ORGH.DOC.110(c) Ground operations manual (GOM)

OTHER RELEVANT CONTROLLED DOCUMENTS

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

- (8) SAE standards for de-/anti-icing of aircraft on ground,
- (9) Good-practice documents developed by the Ground Handling Operations Safety Team (GHOST),
- (10) Safety Stack operational procedures used at an aerodrome,
- (11) GSE manufacturer manuals.

Rationale for point (10)

Although the Safety Stack model is suitable only for certain aerodromes and a specific operational configuration, it is considered a good example for this list, possibly less known than the IATA, SAE, JIG, IBAC, and other organisations developing good practices. The safety and efficiency benefits of the Safety Stack model are considerable. For instance, after the first year of implementation of the harmonised procedures developed by the Safety Stack (the group of organisations operating at Luton Airport), the airport registered a 100% decrease in ground handling damage incidents while the traffic rose by 5% and efficiency (on time performance) by 7%. Information sources: [Skybrary](#), [Safeorg](#).

SUBPART TRG — TRAINING OF GROUND HANDLING PERSONNEL (ORGH.TRG)

ORGH.TRG.100 Training programme

- (a) The GH organisation shall ensure that the personnel are properly trained and have demonstrated their competence in their particular duties before carrying out the assigned tasks.
- (b) As part of its management system, the GH organisation shall develop and implement an initial and recurrent training and assessment programme for the GH personnel, to ensure their competence to perform the tasks in accordance with the standards and assigned roles established as per ORGH.GEN.110 and to maintain their competence. The training and assessment programme for each GH safety-critical function shall be based on a competency-based training and assessment (CBTA) method. The training and assessment programme shall be included in the GH organisation's GOM.

The CBTA programme shall:

- (1) define training standards and objectives based on the specific tasks and duties for each GH safety-critical function, operational procedures, operational context, and the hazards and associated risks inherent in each GH function;
- (2) establish the required competencies for each safety-critical GH function and the minimum competency levels, and develop the training programme to achieve and maintain those competencies;

The basic competency level shall cover knowledge, skills, and attitudes commensurate with the generic tasks specific to each GH safety-critical function.

- (i) The knowledge component shall be based on standard operational procedures related to the GH function, aircraft operator procedures, relevant aspects of the

local aerodrome procedures, and, as applicable, operations in adverse weather conditions, winter operations and night operations.

The knowledge component shall cover:

- (A) aviation basic knowledge,
 - (B) GH specific training per assigned function,
 - (C) safety management system scalable to the assigned GH function and tasks,
 - (D) airside safety and working around the aircraft, as applicable,
 - (E) human factors,
 - (F) occurrence reporting,
 - (G) dangerous goods,
 - (H) operational procedures of the aircraft operators.
- (ii) The skill component shall address the technical and human skills to ensure the individual achieves the practical abilities to correctly perform the tasks specific to their role. It shall also include development of skills to integrate and apply operator specific procedures into the standard operational procedures.
- (iii) The attitude component shall aim at preparing the individual to perform their tasks safely and efficiently, with the understanding and willingness to contribute to maintaining safety of operation at a high standard.
- (3) include on-the-job training to ensure that competency standards appropriate to the personnel's duties are consistently achieved;
- (4) include any other training courses that are required by other applicable regulations.
- (5) establish a process to assess the level of competencies and the achieved competence for each safety-critical GH function at the end of training. The assessment phase shall address all the components in points (2) to (4) to ensure the required competencies have been achieved at the end of the initial training phase.
- (6) include a training needs analysis before enrolling an individual for initial training. This step shall be used to enable recognition of any previous training completed by an individual, when relevant to the assigned function and tasks;
- (7) ensure the personnel's **continued competence** by maintaining their knowledge, skills and attitudes to a level that enables them to perform their tasks in accordance with the standards and objectives established by the GH organisation. This shall be done as follows:
- (i) **Recurrent assessment and subsequent retraining**

The recurrent assessment shall focus on evaluating the individual's performance in completing the assigned tasks during their daily activities. It shall be done at regular intervals, as considered relevant for the operational context, but not exceeding 36 months from the previous training and assessment session. The recurrent assessment may be performed by an appropriately trained supervisor.

The results of the recurrent assessment may lead to retraining in those areas where the competencies were assessed to be below the established levels.
 - (ii) The **recurrent training** shall be performed for various training courses, other than training per specific GH function. It shall be performed at intervals specified by the applicable regulations. Recurrent training may be completed at any date within the

last 3 calendar months of the recurrence interval, and then the new interval period may start at the date of completing the last recurrent training.

- (iii) The GH organisation shall ensure the personnel have also completed the following types of training, as applicable:
 - (A) **Refresh training** when an individual did not perform tasks in the assigned function between 3 and 24 consecutive months. The content and the delivery form of refresh training shall be adapted to the length of the absence. Refresh training may be performed also as a form of seasonal variations of activities.
 - (B) **Update training**, in any of the following cases:
 - (a) an individual is assigned new tasks or GH function,
 - (b) there are new amendments to the regulations that directly affect the execution of their tasks, or
 - (c) there are new processes, procedures, or changes to the operational environment.
- (c) The GH organisation shall ensure that the trainers and assessors of the GH personnel are adequately qualified for the training, assessment, and respectively recurrent assessment tasks.

Rationale

Basic Regulation (EU) 2018/1139 – Annex VII Essential requirements for aerodromes:

*“4.1 (e) the provider shall use only adequately trained and qualified personnel and shall ensure the implementation and maintenance of training and checking programmes to ensure the **continuing competence** of all relevant personnel”.*

This implementing rule sets the basis for a competency-based training and assessment programme (CBTA) for the safety-critical GH functions, such as pushback/towing operator, de-icing operator, loading supervisor, ramp operator (involved in activities upon aircraft arrival and departure), load planner, etc.

More on training:

Competence = the ability to perform a task safely, successfully and efficiently to a required standard.

Competency = a dimension of human performance that is used to reliably predict successful performance on the job. A competency is manifested and observed through behaviours that mobilize the relevant knowledge, skills and attitudes to carry out activities or tasks under specified conditions. (ICAO Annex 1)

Competency-based training and assessment programme – definitions currently transposed in EU regulations from ICAO PANS-TRG (Doc 9868) or Annex 1:

‘competency-based training and assessment’ (CBTA) means assessment and training programmes that are characterised by a performance orientation, emphasis on standards of performance and their measurement and the development of training to the specified performance standards;

‘competency framework’ means a complete set of identified competencies that are developed, trained and assessed in the GH organisation’s CBT programme utilising scenarios that are relevant to

operations and which is wide enough to prepare the GH personnel for both foreseen and unforeseen threats and errors.

The training requirement for unescorted access to the movement area and other operational areas on the aerodrome are already covered by ADR.OR.D.017(c) and (d), so it is not repeated here.

Cargo handling (up to warehouse activities but not further in the freight forwarding chain) should be covered by the GH training requirements, as all persons who build cargo or baggage in a ULD must be able to do it competently.

The regulation on passengers with disabled persons and persons with reduced mobility (EC) 1107/2006 contains no safety provisions and no requirements on dangerous goods training (especially considering that wheelchairs contain batteries, which are dangerous goods). Considering this, training on safety-related tasks for the personnel responsible with the passengers with reduced mobility on aerodromes should be covered by the GH training requirements as well.

GM1 ORGH.TRG.100(a) Training programme

TEMPORARY AND LEASE GH PERSONNEL

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

GM1 ORGH.TRG.100(b) Training programme

SAFETY-CRITICAL GH FUNCTIONS

The following GH functions are considered to be safety-critical and for which a CBTA programme should be developed and implemented:

- (1) Load control: load planning, mass&balance calculations, issuing of load control documents (loadsheets, loading instructions, NOTOC)
- (2) Loading supervisor
- (3) Aircraft loading/ unloading
- (4) Operation of GSE: passenger stairs, passenger boarding bridge, airbridge, cargo loader
- (5) Aircraft movement (towing, pushback)
- (6) Aircraft arrival preparation
- (7) Turnaround coordination
- (8) Fuelling operations
- (9) De-icing/anti-icing operations.

GM2 ORGH.TRG.100(b) Training programme

TYPES OF TRAINING

The terms used in the implementing rules are understood as follows:

- (a) **On-the-job training** is the component of the training programme performed in the operational environment, which combines the knowledge, skills and attitudes acquired during the previous training phases in a realistic environment.
- (b) The **recurrent assessment** of competencies is done in the operational environment. The employees are informed in advance that they are being assessed. The purpose of the recurrent assessment is to ensure the personnel remain competent in performing their tasks and that the competencies achieved during the initial training are maintained. When the performance is evaluated to be below the established standards, the person is **retrained** only in the competency that has been found below the standards. There is no need that the person undergoes full recurrent training.
- (c) **Recurrent training**
- (1) Recurrent training includes training and assessment of the knowledge and skills of an individual, which are necessary to perform their GH tasks to the required standard.
 - (2) Recurrent training applies when the GH organisation does not apply the recurrent assessment and retraining method to maintain personnel's competence.
 - (3) Recurrent training applies to the training on specific domains required by other applicable regulations. Examples of training courses requiring a recurrent training at a fixed interval: dangerous goods, de-icing, security, driving on apron, FOD, etc. Most of these trainings have a recurrence interval specified in the relevant regulation that is different from the recurrent training intervals for GH specific functions: e.g., 24 months for dangerous goods; 24 months for any aerodrome-specific training as required by Regulation (EU) 139/2014; 12 months for de-icing; 36 months or more for security, etc.
- (d) **Refresh training** is the training to **re-qualify** an individual. It is expected to address the gaps identified in the person's competence to perform their tasks to the established standards. It includes training and assessment of the knowledge and skills appropriate to the person's GH function.

The refresh training should apply in either of the following cases:

- (1) The individual has previously achieved competence to perform a certain function but can no longer demonstrate the required competence.
- (2) The individual has been absent from their operational role for an extended period of time, between 3 and 12 consecutive months.

For points (1) and (2), the refresh training should take one of the following forms:

- (i) a formally documented briefing and on-the-job assessment; or
- (ii) a briefing and work under supervision. This should apply also if the individual is inexperienced and only had initial training.

The briefing can be done in different formats, such as classroom training, online training, videos.

- (3) The individual has been absent from the operational role for maximum 3 consecutive months. In this case, they should undergo a briefing to include any updates on the operational context. If necessary, an update training should be added.
- (4) The individual has been absent from the operational role between 12 and 24 consecutive months. In this case, they should undergo briefing and refresher (requalification) training to re-establish their competence.

- (5) If recurrent assessment of competencies is applied, the refresh training may be incorporated in this process instead of being seen as a self-standing, isolated training step that needs to be applied only in the situations described above.
- (e) **Update training** is the training on changes in a procedure or a regulation, or new procedures, the elements of which have not yet been included in the recurrent training. Its purpose is to ensure that a person remains competent as a result of changes relevant to the completion of their tasks. Such training is developed and delivered following an effective analysis and change management process. The update training can have a various forms including classroom, online training or formally documented briefings to employees.
- Example of update training: changes to operational procedures, new aircraft type in the fleet, new operating systems, equipment, or a combination of these.
- (f) The GH organisation may decide to speed up the training course if a person's responsibilities require their taking up duties sooner than the normal duration of a training would take.

AMC1 ORGH.TRG.100(b)(2) Training programme

TRAINING AND ASSESSMENT PROGRAMME

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

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

AMC2 ORGH.TRG.100(b)(2) Training programme

TRAINING COURSES

- (a) The GH-specific training mentioned in point ORGH.TRG.100(b)(2)(i)(B) should include the following, as necessary and applicable to the GH tasks of the individual:
- (1) passenger services, including assistance to passengers with reduced mobility,
 - (2) load planning, messages and communications, preparation of loadsheet, loading instructions, NOTOC;
 - (3) baggage handling (sortation),
 - (4) ramp handling, aircraft arrival and departure activities,
 - (5) aircraft towing/pushback,
 - (6) aircraft de-icing/anti-icing,
 - (7) aircraft refuelling,
 - (8) aircraft cleaning,
 - (9) potable water servicing,
 - (10) lavatory servicing,
 - (11) aircraft loading/unloading, stowage, strapping, securing load
 - (12) loading supervision,
 - (13) operation of GSE, operation of elevating equipment, hand signals for GSE guidance,
 - (14) operation of passenger boarding bridges,
 - (15) turnaround coordination,
 - (16) operation of aircraft doors (cabin and cargo compartments),
 - (17) cargo acceptance,
 - (18) handling of ULDs,
 - (19) activities specific to cargo and mail handling not listed above,
 - (20) ground supervision,
 - (21) Departure control system and any other training on IT tools and equipment used by the GH organisation and as required by the operational procedures of the aircraft operators,
 - (22) All-weather operations and operations in winter conditions, as applicable.
- (b) The GH organisation should observe the intervals for recurrent training and continuing assessment of competence established through other current regulations. When an interval for the recurrent training is not specified, then the GH organisation should apply the requirements for recurrence and maintaining the personnel's competence specified in point ORGH.TRG.100.

GM1 ORGH.TRG.100(b)(2) Training programme

DEVELOPMENT AND IMPLEMENTATION OF A COMPETENCY-BASED TRAINING AND ASSESSMENT (CBTA) PROGRAMME FOR THE SAFETY-CRITICAL GH FUNCTIONS

The GH organisation should establish 3, maximum 4 main competencies selected from the general competency framework provided in ICAO Doc 9868 and develop and implement the CBTA programme for each GH specific function based on those competencies. The selection should be based on the need to address the safety risks associated with that GH function. These competencies should be the minimum necessary for the basic level of a specific safety-related GH function.

Step 1: Establish the main GH functions with safety relevance within the GH organisation's organisations, based on the range of GH services provided.

Step 2: Perform a training needs analysis: what is the level of training and qualification of the trainee before training, what it should be for the respective function after training.

Step 3: Set the training objective, based on the safety objective to be achieved by that GH function.

Step 4: Set the training targets, based on the tasks specific to the GH function established in Step 1 (see examples of GH safety critical functions below). These should be realistic targets, something that the individual is usually expected to perform as per the standard established in the GOM.

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

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

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

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

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

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

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

The written evidence of an assessment event will specify which elements were assessed, when they were assessed and the result of the assessment. Where the operational assessment shows a

performance failure or lack of knowledge, the instructor/assessor will apply re-training to correct both the performance and any knowledge gaps. The level of action will be proportionate to the requirement.

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

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

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

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

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

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

Rationale

The competency framework used in this GM is proposed by ICAO and is applicable to most of the aviation personnel.

It is likely that not all those competencies are relevant for the GH specific activities. However, some of them, such as situational awareness, application of procedures and regulations, technical expertise,

communication or problem-solving and decision making are essential for some of the GH specific functions.

Stakeholders are invited to propose other competencies, more relevant for the GH domain.

GM2 ORGH.TRG.100(b)(2) Training programme

HUMAN PERFORMANCE AND ATTITUDE COMPONENTS OF GH SAFETY-CRITICAL FUNCTIONS

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

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

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

increases in turn the likelihood of the candidate successfully completing the CBTA training programme.

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

GM3 ORGH.TRG.100(b)(2) Training programme

FURTHER GUIDANCE FOR AN EFFECTIVE TRAINING AND ASSESSMENT PROGRAMME

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

GM1 ORGH.TRG.100(b)(3) Training programme

ON-THE-JOB TRAINING AND RECURRENT ASSESSMENT WITH SUPERVISORS OR MENTORS

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

Whenever the size of an organisation permits it, for the purpose of on-the-job training and recurrent assessment, the GH organisation may use senior employees competent in the same tasks as the trainee to act as mentors for the trainees.

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

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

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

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

AMC1 ORGH.TRG.100(b)(4) Training programme

OTHER TRAINING COURSES

- (a) The training programme should include, besides the elements specified in point ORGH.TRG.100(b)(2)(i), training on the following areas, as applicable to the specific GH function of an individual:

- (1) Accident/incident investigation,
 - (2) Any additional training as required by the aircraft type and the type of technology and energy used for propulsion.
- (b) Other training courses that should be included in the training programme, as applicable subject to the GH specific function, may be developed by the specific domains and regulations that require them. These are the following:
- (1) Foreign object debris (FOD), as per Reg. (EU) 139/2014,
 - (2) Airside driving, as per Reg. (EU) 139/2014,
 - (3) Aviation security,
 - (4) Emergency response procedures, appropriate to the assigned role.

AMC1 ORGH.TRG.100(b)(6) Training programme

RECOGNITION OF TRAINING

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

AMC1 ORGH.TRG.100(b)(7) Training programme

RECURRENT ASSESSMENT AND SUBSEQUENT RETRAINING

- (a) To ensure continued competence of GH personnel in performing the tasks as per the required standards, the GH organisation should develop and implement a method to perform continuing non-punitive assessments and subsequent retraining of the GH personnel.
- (b) The non-punitive assessment should be performed during real-time activities (on-the-job performance) and should be based on realistic and evident tasks specific to the role.
- (c) The recurrent assessment programme should:
 - (1) identify the responsibilities of the assessors and the assessment methods, tools, and procedures;
 - (2) include procedures to be applied in the event that personnel do not perform their tasks at the required standards.
- (d) The individual(s) under assessment should be informed in advance of the date and the expected assessment conditions.
- (e) The recurrent assessment should check knowledge, skills and attitudes simultaneously. A recurrent assessment session does not need to cover the verification of all competencies at the same time; however, all competencies should be assessed until the next recurrent training session.
- (f) The assessment should provide the anonymous and confidential results and a recommendation of corrective measures.

- (g) The minimum pass rate for an examination should be 80%.
- (h) The results and recommendations from the evaluation should support the gap analysis to identify competency gaps of a group and adjust tasks and the respective training for the role-related target group, rather than individual competency gaps.
- (i) The resulting re-training based on the gap analysis should be later on applied to the intended target group.
- (j) The GH organisation should establish a procedure to ensure that the instructor/assessor reviews the incorrect answers together with the trainee in order that their knowledge is 100% 'error free' and correct on leaving the learning environment.
- (k) The frequency of the recurrent assessment should be driven by evident scenarios, safety events, accident/incident reports, or changes within the regulation or aircraft operators' manuals, and results from regular non-punitive competence evaluations. The evaluation and re-training interval should not exceed 36 months.
- (l) If the recurrent assessment indicates areas where the level of competencies is below the required standard, the GH organisation should adjust the retraining session to the needs identified after the recurrent assessment, to address the gaps in performance.
- (m) The recurrent assessment and retraining should be documented for recording and inspection purposes.

ASSESSORS OF CONTINUED COMPETENCE

- (n) The GH organisation may appoint, as assessors, individuals that have similar tasks and responsibilities in its organisation.
- (o) Additionally, these assessors should receive further training in the human performance and limitations, as well as minimum elements of instructor and assessor training, to be able to perform the instructions and assessment of their peers.

GM1 ORGH.TRG.100(b)(7) Training programme

ASSESSMENT AND ERROR-FREE LEARNING

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

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

GM2 ORGH.TRG.100(b)(7) Training programme

MEANS TO IMPLEMENT RECURRENT ASSESSMENT

[placeholder]

The GH organisation should develop checklists to be used by assessors for recurrent assessment of individuals during their day-to-day activities.

GM4 ORGH.TRG.100(b)(2) Training programme

COMPETENCIES REQUIRED FOR A PUSHBACK TOWING DRIVER – EXAMPLE

For the pushback/towing driver, the training programme should develop the individual's main competencies necessary for this function. The training should be based on the main tasks specific to the job of a pushback/towing driver.

The main competencies to be developed in the training programme are: situational awareness, communication, operational procedures.

Technical expertise could be a third main targeted competency.

GM5 ORGH.TRG.100(b)(2) Training programme

TRAINING FOR THE LOAD PLANNING FUNCTION: COMPETENCIES, KNOWLEDGE AND SKILL COMPONENTS

- (a) The knowledge component should include:
 - (1) aircraft mass and balance,
 - (2) load planning and loadsheet,
 - (3) communications and messages
- (b) Competencies: application of procedures, technical expertise, communication

GM6 ORGH.TRG.100(b)(2) Training programme

TRAINING FOR THE RAMP AGENT FUNCTION: COMPETENCIES, KNOWLEDGE AND SKILL COMPONENTS

- (a) The knowledge component should include:
 - (1) Airside safety
 - (2) ERA
 - (3) Chocks and cones procedures
 - (4) Aircraft arrival activities
- (b) Competencies: situational awareness, teamwork, application of procedures

GM7 ORGH.TRG.100(b)(2) Training programme

TRAINING FOR THE TURNAROUND COORDINATION FUNCTION: COMPETENCIES, KNOWLEDGE AND SKILL COMPONENTS

- (a) The technical knowledge content for the turnaround coordinator function should include the following elements, as applicable to the ground handling activities under supervision:
 - (1) Turnaround management

- (2) Principles of flight
 - (3) Mass and Balance terminology
 - (4) Aircraft performance limitations
 - (5) Unit Load Devices
 - (6) Aircraft hold layout
 - (7) Load spreading
 - (8) Ballast and Restraint
 - (9) General loading principles
 - (10) Load Instruction / Report
 - (11) Loadsheet and NOTOC
 - (12) Last Minute Changes
 - (13) Aviation Weather
 - (14) Passenger boarding bridge, air bridge
 - (15) Aircraft passenger doors
 - (16) Aircraft refueling awareness
 - (17) Aircraft de-icing awareness
 - (18) Aircraft operator specific procedures
- (b) Competencies: situational awareness, communication, workload management, coordination and handover

Rationale:

GM4, GM5, GM6 and GM7 to ORGH.TRG.100(b)(2) are examples (incomplete) of how the competencies should be established and training developed for each GH safety-critical function.

EASA will develop more GM together with the experts in this sense, to cover the CBTA for the following:

TRAINING FOR THE AIRCRAFT LOADING/UNLOADING FUNCTION: COMPETENCIES, KNOWLEDGE AND SKILL COMPONENTS

TRAINING FOR THE LOADING SUPERVISION FUNCTION: COMPETENCIES, KNOWLEDGE AND SKILL COMPONENTS

TRAINING FOR THE GSE/VEHICLE OPERATOR: COMPETENCIES, KNOWLEDGE AND SKILL COMPONENTS

TRAINING FOR OPERATING ELEVATING EQUIPMENT: COMPETENCIES, KNOWLEDGE AND SKILL COMPONENTS

TRAINING FOR THE PUSHBACK/TOWING: 1. HEADSET OPERATION/ENGINE START; 2. EQUIPMENT OPERATOR: COMPETENCIES, KNOWLEDGE AND SKILL COMPONENTS

TRAINING FOR THE DE-ICING/ANTI-ICING FUNCTION

(Airside driving is covered by Regulation (EU) 139/2014.)

AMC1 ORGH.TRG.100(c) Training programme

TRAINER AND ASSESSOR TRAINING

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

AMC2 ORGH.TRG.100(c) Training programme

GH INSTRUCTORS/TRAINERS – MINIMUM QUALIFICATION AND COMPETENCE

[Placeholder]

ORGH.TRG.105 Additional requirements related to training

- (a) The GH organisation shall ensure that it uses suitable facilities, means, equipment and tools for the delivery of training and the conduct of assessments and recurrent assessments.
- (b) The GH organisation shall also:
 - (1) ensure the training material is provided in a language that can be understood by the GH personnel concerned;
 - (2) maintain records of the training and assessments and associated qualifications, to demonstrate compliance with this requirement; and
 - (3) provide a copy of such records to the individual, upon request.

ORGH.TRG.110 Dangerous goods training

- (a) The GH organisation shall ensure that the personnel involved in the handling of dangerous goods are competent to perform the assigned tasks safely and in accordance with the applicable operational procedures and the Technical Instructions.
- (b) The organisation shall establish and implement dangerous goods training programmes for GH personnel, commensurate with their functions and responsibilities, as per the Technical Instructions.
- (c) Minimum awareness training in accordance with the Technical Instructions shall be mandatory for GH organisations not involved with ground transportation and handling of dangerous goods, which provide any of the following services:
 - (1) passenger and baggage handling,
 - (2) mail and cargo handling,
 - (3) aircraft loading, unloading, and loading supervision.

ORGH.TRG.115 Language proficiency

- (a) The GH organisation shall comply with the relevant language proficiency requirements for vehicle drivers of Regulation (EU) 139/2014.
- (b) The required level of proficiency in English and any other language used for communication at an aerodrome shall be determined by the GH organisation for the safety-critical GH roles and included in their training programme.

Rationale

Language proficiency for drivers is regulated by the Aerodrome Regulation (EU) 139/2014. However, this point also includes an exception from those requirements, in point (g). It will be up to the GH organisation and the aerodrome operator to establish the conditions to benefit from that exception.

AMC1 ORGH.TRG.115 Language proficiency**OPERATIONAL PROFICIENCY IN ENGLISH AND OTHER LANGUAGE USED AT AN AERODROME**

- (a) Personnel performing safety-critical functions, as well as any other personnel appointed by the GH organisation, who communicate regularly with the aircrew or the air traffic control as part of their regular tasks, should be able to demonstrate an operational level of proficiency in the English language.
- (b) The following GH functions are considered to be safety critical:
 - (1) aircraft towing/pushback,
 - (2) de-icing/anti-icing,
 - (3) turnaround coordination or supervision of GH activities on the apron,
 - (4) load planning, messages and communications,
 - (5) loading supervision.
- (c) For any other language(s) commonly used at an aerodrome, the GH organisation should establish the level of operational proficiency appropriate to specific GH roles and duties.
- (d) Language training should contain communication in a job-related context particularly to handle abnormal and emergency situations and conduct non-routine coordination with colleagues and other GH operational staff. Emphasis should be placed on listening comprehension, speaking interaction and vocabulary building.
- (e) To demonstrate operational proficiency, the applicant should have the following abilities:
 - (1) communicate on common and work-related topics with accuracy and clarity;
 - (3) use appropriate communicative methods to exchange messages and to recognise and resolve misunderstandings in a general or work-related context;
 - (3) handle linguistically a complication that occurs during a routine work situation or a communicative task with which they are otherwise familiar;

SUBPART GSE — GROUND SUPPORT EQUIPMENT (ORGH.GSE)

ORGH.GSE.100 Ground support equipment — general

- (a) As part of its management system, the GH organisation shall have a process to ensure that the ground support equipment (GSE) used for the provision of ground handling services observes all the following requirements:
- (1) It is subject to an inspection prior to first use in operation;
 - (2) It is serviceable and in good condition so as not to cause any injuries to persons or damage to the aircraft or other vehicles or property;
 - (3) It is operated according to the operating instructions and within the design parameters of the equipment;
 - (4) It is used only for the purpose(s) for which it is designed;
 - (5) It is suitable to the type of aircraft for which it is used;
 - (6) It is maintained in accordance with the GH organisation's maintenance programme and instructions, with due consideration to a minimum impact on the environment.
- (b) For this purpose, that GH organisation shall:
- (1) Have and implement adequate procedures and instructions for the safe operation of the GSE.
 - (2) Have established means of ensuring receipt of, and appropriate action on, service bulletins, service updates, recalls and other notifications regarding the safety and use of the equipment issued by the manufacturer and/or authorities.
 - (3) Ensure that the personnel using GSE have a valid driver's licence if required, have been authorised by the aerodrome operator to drive on the apron, and are properly trained and their competencies are maintained.
 - (4) Ensure that non-serviceable GSE are properly marked or labelled and are not used for current operation.
 - (5) When GSE maintenance services are outsourced,
 - (i) ensure that the maintenance is performed in accordance with the equipment manufacturer instructions and specifications, which cover maintenance and repair instructions, servicing information, troubleshooting, and inspection procedures.
 - (ii) ensure that GH organisation have GSE maintenance evidence from the outsourced GSE maintenance company.
 - (6) Comply with the applicable design and manufacturing standards of the GSE used.

AMC1 ORGH.GSE.100 Ground support equipment – general**GENERAL**

- (a) The GH organisation should consider the following aspects when acquiring any ground support equipment (GSE):
 - (1) Human factor principles, including ergonomics, and equipment controls,
 - (2) Environmentally neutral technology,
 - (3) Enhanced systems to prevent aircraft damage,
 - (4) Aerodrome operator requirements on GSE.
- (b) When using autonomous vehicles, the GH organisation should ensure that these have been authorised by the aerodrome operator to be used at that aerodrome and any additional local specific requirements are observed.

ORGH.GSE.110 GSE maintenance programme

- (a) As part of its management system, the GH organisation shall establish and implement a maintenance programme, to maintain the systems and equipment necessary for the provision of GH services in a state of operation that does not impair the safety of persons, aircraft and other vehicles or equipment, regularity of efficiency of operations. It shall ensure the following:
 - (1) Implement a maintenance programme for its vehicles and equipment that operate on the movement area and other operational areas at the aerodrome.
 - (2) Establish procedures to implement the maintenance programme.
 - (3) Maintenance is performed in adequate workshops, by qualified personnel, and in accordance with the manufacturer's instructions or, in their absence, with the instructions provided by the GSE owner or lessor.
 - (4) The maintenance programme is effectively implemented using appropriate and adequate means and facilities, including when maintenance services are outsourced.
 - (5) Unserviceable vehicles and GSE are clearly tagged as 'out of service' and not used for operations.
 - (6) Establish a plan for preventive maintenance inspections, where appropriate.
 - (7) Keep maintenance records for each vehicle and GSE.
- (b) The maintenance programme shall be adequate to the frequency and the specific conditions of the use of a particular GSE. It shall include, as a minimum:
 - (1) An inspection and fault reporting process,
 - (2) Proof that the GSE has been verified before being released back into service.
- (c) The design and implementation of the maintenance programme shall observe the human factor principles.
- (d) The maintenance programme shall ensure compliance with the specified service interval throughout the life of the equipment.

- (e) When maintenance of the GSE is performed by other organisations participating in a pooled equipment agreement or rental agreement, the GH organisation shall ensure that the responsibility for the maintenance is documented.

AMC1 ORGH.GSE.110 GSE maintenance programme

MAINTENANCE PROGRAMME

- (a) The GH organisation should use the maintenance programme and instructions provided for by the equipment manufacturer.
- (b) The maintenance programme of the GSE should be reflected in the safety risk assessment process of the GH organisation.

GM1 ORGH.GSE.110

FURTHER GUIDANCE

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

ORGH.GSE.115 GSE pooling

- (a) Where adequate and provided by the aerodrome operator or by another organisation at an aerodrome, the GH organisation may enter an agreement on GSE / equipment pooling at that aerodrome.
- (b) In the case of 'pooled' GSE, the GH organisation shall ensure that the specific arrangement with the organisation providing the GSE meets the requirements for contracted activities and any other applicable requirement of this Regulation, including ensuring training of personnel for the operation of the GSE, operational procedures for the use of the GSE, as well as the maintenance programme of the GSE.
- (c) The GH organisation shall adhere to the safety requirements established through the equipment pooling agreement. It shall ensure that the level of safety is not below the standards established by its own SMS. In such case, the GH organisation may request a review of the safety requirements of the pooling agreement together with the other organisations involved in the agreement.

Rationale

This implementing rule enables the option for the GH organisations to use pooled equipment if this practice is commonly applied at an aerodrome.

It also gives the GH organisation the right to question the safety elements of the equipment included in the pooling agreement if it considers that the level of safety is below its standards. This is a privilege and also a responsibility of the GH organisation established through the GH Regulation, which requires the GH organisation to develop its own SMS and be responsible for the safety of its own operation.

DRAFT

ANNEX IV

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

GH.OPS.005 General responsibilities for the provision of services and safety risk mitigations

- (a) The GH organisation shall be responsible for the following aspects for all the GH activities it performs:
- (1) correct implementation of the operational procedures and application of the instructions provided by the aircraft operator and, when applicable, of the aerodrome operator,
 - (2) ensure that the personnel performing the ground handling activities are trained and competent to perform the assigned tasks,
 - (3) operation and maintenance of any equipment used for this activity are performed in accordance with Subpart ORGH.GSE.
- (b) In accordance with point 4.1(c) of Annex VII to Regulation (EU) 2018/1139, the GH organisation shall provide services in accordance with the instructions and procedures of the aircraft operator.
- (c) Notwithstanding point (b), the GH organisation shall use its own operational procedures in either of the following cases:
- (1) if agreed and accepted by the aircraft operator; or
 - (2) if the aircraft operator does not provide any operational procedures.
- (d) If the operational procedures provided by the aircraft operator differ from those of the GH organisation, the procedures of the aircraft operator shall prevail. The GH organisation shall address with the aircraft operator any conflicting instructions that may affect the safety of aircraft, its passengers, or the GH personnel as soon as they have been identified.
- (e) The operational procedures shall:
- (1) cover, as applicable, all services provided, as listed in Article 1 of this Regulation;
 - (2) be appropriate to the aircraft type and operational context;
 - (3) ensure that the aircraft handling activities are conducted in a way that the risks of damage to the aircraft or other vehicles on the ground and injuries to personnel and passengers are minimised, and that the safety of flight is not compromised.
- (f) As per point 4.1(b) of the Essential Requirements of Annex VII to Regulation (EU) 2018/1139, the GH organisation shall comply, as applicable to its activities, with the procedures provided to it by the aerodrome operator related to the following operational aspects as described in Regulation (EU) No 139/2014:
- (1) foreign object debris (FOD) control programme;
 - (2) authorisation and operation of drivers and vehicles;
 - (3) aircraft towing;

- (4) communications between vehicles and ATC;
 - (5) control of pedestrians;
 - (6) fuel quality and safety of apron during refuelling/defueling;
 - (7) operations in winter conditions;
 - (8) night operations;
 - (9) operations in adverse weather conditions;
 - (10) marking and lighting of vehicles and other mobile objects;
 - (11) apron management safety-related activities;
 - (12) aircraft departure from the stand;
 - (13) information to organisations operating at the apron;
 - (14) alerting of emergency services;
 - (15) jet blast precautions;
 - (16) high-visibility clothing.
- (g) The procedures of the aerodrome operator on the safe use of the aerodrome covering the elements in point (e) shall take precedence over the procedures with the same scope of the GH organisation or the aircraft operator. The GH organisation shall address any conflicting instructions or procedures with the aerodrome operator as soon as they have been identified.
- (h) The GH organisation shall ensure that a copy of relevant operational instructions and procedures is available to each of its employees, according to their tasks and communicated in a manner that ensures their understanding. The GH organisation shall also ensure that their personnel are able to understand and comply with the instructions and procedures from the airport operator and/or competent authorities that might be provided only in the national language.

GH.OPS.010 Interfaces with other organisations

As part of its management system, the GH organisation shall have a process to identify the interfaces with the aerodrome operator and the aircraft operator(s) to which it provides services. The process to address the interfaces shall:

- (a) cover specific aircraft operator's operational procedures, local aerodrome environment, safety procedures and/or operational constraints. Such operational interfaces shall be based on a safety risk assessment and agreed by all relevant stakeholders.
- (b) ensure that the relevant parts of its safety management system are compatible and complementary with those of the aerodrome operator and aircraft operator, also with the aim to promote a common understanding of hazards, risks, incidents, etc. This activity shall be connected with the collaborative decision-making process initiated by an aerodrome operator;
- (c) ensure mutual communication and sharing of safety relevant information on a regular basis, as relevant, with the organisations affected by the GH activities, to improve and maintain the safety of operations.

AMC1 GH.OPS.010 Interfaces with other organisations

PROCEDURES

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

Rationale

The content of this AMC is taken from ICAO Doc 10121.

'Operational safety benefits can be achieved through an enhancement of safety as a result of shared ownership of safety risks.' (ICAO Doc 10121, 1.4.14)

GM1 GH.OPS.010 Interfaces with other organisations

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

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

- (c) Guidance on A-CDM can be found in the Manual on Collaborative Air Traffic Flow Management (ATFM) (Doc 9971), Part III, Airport collaborative decision-making.

GM2 GH.OPS.010 Interfaces with other organisations

ASPECTS TO BE COVERED BY THE INTERFACES

This GM is developed considering the guidelines for establishing operational interfaces provided in ICAO Doc 10121 Manual on Ground Handling. The main stakeholders to which this GM refers are GH organisation, aircraft operators and aerodrome operators.

Not all stakeholders will have a role to play in each of the operational procedures that are part of the interfaces. In order to avoid any confusion in this sense, it is important that they clarify their responsibilities and tasks for each of the common activities and that their personnel are familiarised with them.

For example, the aircraft operator is responsible to establish procedures and instructions for the safe operation of each aircraft in its fleet, and the GH organisation is responsible to provide the GH services in accordance with those procedures and instructions. This means that the aircraft operator and the GH organisation need to have a process for coordination to ensure the management of safety risks in operations. For this purpose, the SMS of both the aircraft operator and the GH organisation need to be compatible and complementary for the common interface elements.

In cases where processes and policies are not provided by an aircraft operator, for instance in the case of general aviation or flight diversion, the GH organisation should use the policies and procedures in its own ground handling services manual.

The operational interfaces should identify the clear tasks and responsibilities at least for the following processes and activities. However, it should be kept in mind that the interfaces may involve more stakeholders depending on the contracted activities and the concluded agreements. For instance, any equipment that is rented by the aerodrome operator to the GH organisation may add new elements to the interfaces between them:

- (a) For the aerodrome operator, aircraft operator(s), and the GH organisation:
- (1) General safety elements:
 - (i) Compatibility of the SMS elements of all three stakeholders, including ERP.
 - (ii) Walking and working airside. The aerodrome operator procedures established in accordance with Reg. (EU) 139/2014 will be observed by the GH organisation and the aircraft operator.
 - (iii) Foreign object debris (FOD). The aerodrome operator procedures established in accordance with Reg. (EU) 139/2014 will be observed.
 - (iv) General safety during refuelling (more guidance is provided in ICAO Doc 9977).
 - (v) Adverse weather conditions. The aerodrome operator procedures established in accordance with Reg. (EU) 139/2014 will be observed.
 - (vi) General awareness of dangerous goods (more guidance is provided in Doc 9284).
 - (2) Turnaround activities:
 - (i) Aircraft arrival

- (ii) Passenger boarding bridges and passenger stairs
 - (iii) Ground power and preconditioned air
 - (iv) Aircraft refuelling
 - (v) Toilet and potable water servicing
 - (vi) Catering services
 - (vii) Air start unit (ASU)
 - (viii) Aircraft departure
 - (ix) Towing/pushback
 - (x) Aircraft de-icing and anti-icing.
- (b) For the aircraft operator(s) and the GH organisation:
- (1) General safety elements:
 - (i) Compatibility of the SMS elements of both stakeholders, including the emergency response plan
 - (ii) Ongoing management of safety risks
 - (iii) Sharing of safety-relevant information
 - (iv) Equipment approaching the aircraft
 - (2) Turnaround activities:
 - (i) Turnaround coordination
 - (ii) Load planning
 - (iii) Loading and unloading
 - (iv) Elevating equipment.
- (c) For the aerodrome operator and the GH organisation:
- (1) General safety elements:
 - (i) Handling of passengers with reduced mobility. The requirements of Regulation (EC) No 1107/2006 will be observed.
 - (ii) Vehicle and GSE operation.
- (d) Safety risk management
- Hazard identification and risk assessment start with an identification of all stakeholders involved in the GH activities, including independent experts and non-approved organisations. It extends to the overall control structure, assessing, in particular, the following elements across all subcontract levels and all parties within such arrangements:
- (1) coordination and interfaces between the different parties;
 - (2) applicable procedures;
 - (3) communication between all parties involved, including reporting and feedback channels;
 - (4) task allocation responsibilities and authorities; and
 - (5) qualifications and competency of key personnel.
- Safety risk management focuses on the following aspects:

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

GM3 GH.OPS.010 Interfaces with other organisations

RESPONSIBILITIES OF INDIVIDUAL STAKEHOLDERS INVOLVED IN THE SAME GH ACTIVITY

In case of conflicting procedures related to the same activity developed by at least 2 out of 3 of the organisations involved (i.e., GH organisation, aerodrome operator, or aircraft operator), the procedure developed by the organisation that is ultimately responsible for that activity under an applicable regulation will take precedence over the procedures developed by the other organisation(s).

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

Examples:

- (a) Aircraft refuelling involves both the aircraft operator, the aerodrome operator, and the GH organisation providing refuelling services. In case of conflicting procedures related to various aspects involved in this operation, the aerodrome procedure related to the safety of this operation on the ground in the vicinity of the aircraft will always take precedence. The aircraft operator procedure related to the actual refuelling of the aircraft, which is specific to the type of aircraft and the instructions of the aircraft operator about the amount of fuel and the distribution of the fuel in the aircraft tanks will always take precedence. The GH organisation providing the refuelling service will have to consider both the aerodrome operator procedure on aircraft refuelling, which is developed in accordance with the applicable requirement as specified in Regulation (EU) 139/2014, and the aircraft operator instructions as developed in accordance with the applicable fuel/energy requirements of Regulation (EU) 965/2012.
- (b) Procedures for aircraft handling in adverse weather conditions
 - (1) Policies and procedures to cover extreme temperatures, environmental contamination, and instances such as high winds, low visibility and electrical storms where it is unsafe for servicing operations to be conducted.
 - (2) The procedures developed by the aerodrome operator are required to be implemented by all aerodrome users, therefore they will take precedence in case of conflicting instructions with procedures developed by other organisations.

GM4 GH.OPS.010 Interfaces with other organisations

INTERFACES BETWEEN GH ORGANISATIONS, AIRCRAFT OPERATORS AND AERODROME OPERATORS

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

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

Activity	GH organisation	Aerodrome operator	Aircraft operator
	<p>their area of responsibility and ensure personnel are aware of and are participating in the FOD prevention programme effort.</p> <p>3. Personnel should be made aware of the hazards of FOD to aircraft and individuals. To measure programme effectiveness, incidents caused by FOD should be reported.</p>		
Equipment approaching the aircraft	<ol style="list-style-type: none"> 1. Ensure personnel are trained according to the operational procedures and instructions provided by the aircraft operators. 2. Ensure that GSE servicing the aircraft is serviceable. 3. Ensure the GSE avoids any contact with the aircraft fuselage. 4. Ensure that, when positioning GSE, adequate clearance is maintained between all GSE and the aircraft to allow vertical movement of the fuselage during the entire ground handling process. 5. Ensure that each GSE is positioned/ parked so as not to hamper other GH activity, especially escape routes of fuel trucks. 6. GSE which interfaces with the aircraft passenger doors should have platforms of sufficient width that will allow the aircraft doors to be opened/closed with the equipment in place and the safety rails deployed. 		<ol style="list-style-type: none"> 1. Define the rules to be followed for all equipment approaching their aircraft, including but not limited to speed, brake checks, situations where a guide person is needed, clearance from the fuselage and equipment chocking.
General safety during aircraft fuelling operations	<ol style="list-style-type: none"> 1. Ensure that personnel are aware of and take precautions during fuelling operations, safety zones, use of portable electronic devices and sources of ignition, connection of electrical equipment to the 	<ol style="list-style-type: none"> 1. Ensure that all personnel working on apron areas are aware of the safe working practices appropriate to the aircraft fuelling and 	<ol style="list-style-type: none"> 1. Develop policies and procedures for basic safety during fuelling, including precautions for fuelling with

Activity	GH organisation	Aerodrome operator	Aircraft operator
	<p>aircraft, parking restrictions and emergency procedures including fuel spillages.</p> <ol style="list-style-type: none"> 2. Provide specific training to personnel on safety measures applicable during fuelling with passengers on board. 3. Verify the application of safety measures, in particular the provision of clear areas for the deployment of evacuation slides. 4. Be aware of and apply aerodrome procedure for safety of apron during fuelling ops. 	<p>defueling operations.</p>	<p>passengers on board.</p> <ol style="list-style-type: none"> 2. Ensure the operator procedures do not contradict the aerodrome procedures for safety of apron operations during fuelling.
Adverse weather conditions	<ol style="list-style-type: none"> 1. Ensure that its personnel are aware of hazards and precautions to take during adverse weather conditions and that notice of such conditions is communicated to front-line personnel in an effective and timely manner 	<ol style="list-style-type: none"> 1. Establish procedures to ensure the safety of aerodrome operations in adverse weather conditions and ensure GH organisations follow them. 2. Ensure that relevant information on adverse weather conditions is provided to aerodrome users in a timely manner, as well as any applicable restrictions to the operations, such as low visibility. 	<ol style="list-style-type: none"> 1. Develop policies and procedures for the ground handling of their aircraft during adverse weather conditions.
General awareness of dangerous goods	<ol style="list-style-type: none"> 1. Ensure that its personnel are qualified to identify, document, package, handle and load dangerous goods as required by their responsibilities in the operation. 2. Have procedures to ensure dangerous goods incidents and 	<ol style="list-style-type: none"> 1. Have procedures in place to respond to incidents involving dangerous goods. 	<ol style="list-style-type: none"> 1. Develop policies and procedures for the carriage of dangerous goods on their aircraft.

Activity	GH organisation	Aerodrome operator	Aircraft operator
	accidents are reported as required.		
Turnaround coordination	<ol style="list-style-type: none"> 1. Aircraft operators and GH Organisations should agree on a turnaround plan. 2. A turnaround coordination function should facilitate adherence to the plan 		<ol style="list-style-type: none"> 1. Aircraft operators and GH Organisations should agree on a turnaround plan. 2. A turnaround coordinator function should facilitate adherence to the plan.
Load planning			<ol style="list-style-type: none"> 1. Develop procedures in accordance with the air ops requirements to include load planning, mass&balance calculations, production of a Load Instruction/Report, finalization of a load sheet, last minute changes and special load NOTOC, as applicable. 2. Ensure any verbally received load information, which could affect aircraft mass and balance, is documented and communicated to the person responsible for final calculation of weight and balance prior to each flight. 3. Send the GH organisation instructions for aircraft loading.
Aircraft arrival	<ol style="list-style-type: none"> 1. Position the personnel performing the turnaround away from hazard zones. 2. GSE required for aircraft handling should be available, 	<ol style="list-style-type: none"> 1. Ensure that the allocated stand is serviceable and suitable for the 	<ol style="list-style-type: none"> 1. Ensure that the phraseology, signals and procedures regarding communication

Activity	GH organisation	Aerodrome operator	Aircraft operator
	<p>serviceable and positioned well clear of the aircraft path, normally outside the equipment restraint area.</p> <ol style="list-style-type: none"> 3. Personnel in charge of arrival to conduct FOD check on stand prior to aircraft arrival. 4. Ensure that the emergency procedures are understood and the equipment and infrastructure to be used is serviceable. 5. If the GH organisation provides marshalling service, it should agree with the aerodrome operator. 6. Standard hand signals and agreed phraseology (if applicable) to be used for all communication between flight crew and ground personnel in accordance with Part-SERA. 7. Marshallers and wing walkers to be distinguishable to the flight crew and utilise during daytime operations either wands or mitts, of a high visibility colour, or during low visibility/night operations lighted wands. 8. Ensure the personnel understand the use of aircraft anti-collision lights. When an aircraft has an unserviceable APU, specific procedures to be followed to connect the ground power prior to anti-collision lights switched-off. 9. Ensure that required number of serviceable chocks are available for the aircraft to be chocked. The aircraft should not be approached to position the nose wheel chocks until the aircraft has come to a complete stop. Personnel should notify the flight deck crew that the chocks are inserted. 	<p>aircraft characteristics.</p> <ol style="list-style-type: none"> 2. Communicate to the GH organisation the initially allocated stand and any changes in a timely manner. 	<p>between GH organisation personnel and flight deck for arrival are established (for marshalling, pushback and towing in accordance with Part-SERA), practiced and used by flight crew when communicating with GH personnel and vice versa.</p> <ol style="list-style-type: none"> 2. Ensure that procedures for aircraft ground movement are established, including: actions before arrival, standard arrival procedure, use of GSE, danger areas, back-up communications.

Activity	GH organisation	Aerodrome operator	Aircraft operator
Passenger boarding bridges (PBB) and passenger stairs	<ol style="list-style-type: none"> 1. Ensure that personnel operating a PBB or passenger stairs are trained and competent to do so and familiar with the safety features of the equipment they are operating. 	<ol style="list-style-type: none"> 1. Make available training standards and procedures for the usage of each type of PBB operated at the airport. 2. Ensure that any third-party operating PBB is trained to do so, according to the established training programme. 	<ol style="list-style-type: none"> 1. Develop policies and procedures for the use of PBB and stairs on their aircraft, including operation of doors and communication with the cabin crew.
Ground power and pre-conditioned air	<ol style="list-style-type: none"> 1. Ensure that personnel operating mobile or fixed ground power and pre-conditioned air units are qualified and familiar with the features of the equipment they are operating. 	<ol style="list-style-type: none"> 1. Make available training material and procedures for the usage of fixed ground power and pre-conditioned air units. 2. Ensure that fixed ground power and pre-conditioned air units are serviceable and adapted to the aircraft requirements. 3. Ensure that any equipment that is inoperable is removed from the service immediately and notified to the users. 	<ol style="list-style-type: none"> 1. Develop policies and procedures for the use of ground power and pre-conditioned air on their aircraft, including sequencing and communication with the flight and cabin crew
Loading and unloading	<ol style="list-style-type: none"> 1. Ensure that personnel assigned to perform loading and unloading functions are qualified. This includes manual handling, understanding of loading instruction and report, report the final load including deviations, ULD serviceability, aircraft hold inspection and other characteristics such as tipping tendency. 		<ol style="list-style-type: none"> 1. Develop policies and procedures for the loading and unloading of the aircraft, which might include operation of cargo doors. Load classifications and priorities, sequencing, load securing, special

Activity	GH organisation	Aerodrome operator	Aircraft operator
			precautions for aircraft hold fire detection systems and special loads such as live animals, dangerous goods, urgent aircraft parts and other aircraft operator materials.
Elevating equipment (for cargo and catering loading/unloading)	1. Ensure that personnel operating elevating equipment are qualified to do so and familiar with the features of the equipment they are operating.		1. Develop policies and procedures for the use of elevating equipment on their aircraft, such as use of chocks / stabilizers, proximity restrictions and doors operation.
Toilet and potable water servicing	1. Ensure that personnel performing toilet and potable water servicing are qualified to do so and familiar with the features of the equipment they are operating.	1. Provide facilities to uplift potable water and dispose of aircraft toilet waste. 2. Coordinate with the GH organisation to ensure that adequate procedures are in place to manage any spillages during toilet servicing in accordance with local health, safety and environmental regulations.	1. Develop policies and procedures for toilet and water servicing, including liquid quantities required for specific aircraft potable water and toilet configurations.
Air start unit	1. Ensure that personnel performing air start procedures are qualified to do so and familiar with the features of the equipment they are operating. This includes precautions for correct and safe connection to the aircraft, operator communication with the flight crew and other team members.	1. In the case of air start engine start up on the stand, establish special precautions regarding jet blast.	1. Establish policies and procedures for the use of an air start unit on its aircraft.

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

Activity	GH organisation	Aerodrome operator	Aircraft operator
	<p>air operations and any equipment they are operating.</p> <p>2. When responsible for the storage or handling of de-icing and anti-icing fluids, ensure that pre-season, receipt, truck filling and other required quality assurance checks are performed, and that fluid meets the specifications prior to being used in operations.</p> <p>3. Receive and apply instructions from aircraft operator about who will conduct Post De-icing Check.</p>	<p>in place for the collection and recovery of de-icing and anti-icing fluids.</p> <p>3. When responsible for the storage or handling of de-icing or anti-icing fluid, ensure that pre-season, receipt and other required quality assurance checks are performed.</p>	<p>application of the fluids, communication between flight crew and de-icing personnel, and reference to holdover time.</p> <p>2. Agree and instruct GH organisation about who will conduct Post De-icing Check.</p> <p>3. Ultimate responsibility for the aircraft remains with the commander/pilot—in-command as per Reg. (EU) 965/2012.</p>

GH.OPS.015 Ground supervision

When the GH organisation performs ground supervision as a contracted service to an aircraft operator, it shall comply with the following:

- (a) Describe the tasks in its GOM, based on the conditions established by the aircraft operator to which this service is provided.
- (b) When combined with other compatible functions, clearly identify each of them and address any overlapping of functions.

GH.OPS.020 Handling of dangerous goods

- (a) The GH organisation shall ensure that the dangerous goods are handled in accordance with the ICAO Annex 18 and the Technical Instructions.
- (b) Additionally, the GH organisation shall also comply with the relevant provisions of Regulation (EU) No 965/2012 on dangerous goods.
- (c) When providing passenger handling services, the GH organisation shall ensure that passengers are provided with information on dangerous goods as per the Technical Instructions.

- (d) When performing cargo handling, the GH organisation shall ensure that information about the transport of dangerous goods is provided at cargo acceptance points as per the Technical Instructions.

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

ADDITIONAL COMPLIANCE WITH REGULATION (EU) 965/2012

- (a) The GH organisation has to comply also with the dangerous goods requirements applicable to it under Regulation (EU) 965/2012 on air operations.
- (b) Point ORO.GEN.110(j) of Regulation (EU) 965/2012 requires that the dangerous goods training programme of the aircraft operator is approved by the competent authority. When the aircraft operator contracts the services of a third-party GH organisation, this requirement has an effect on the GH organisation providing those services. This applies regardless of whether the aircraft operator holds a specific approval to transport dangerous goods or not.
- (c) The approval of the dangerous goods training programme of a GH organisation continues to remain a responsibility of the aircraft operator under the provisions of point ORO.GEN.205 related to contracted activities.
- (d) The other dangerous goods requirements applicable to the GH organisation as a contracted organisation under Regulation (EU) 965/2012 are the following, depending on the type of operations conducted by the aircraft operator to which it provides services:
- (1) CAT.GEN.MPA.200,
 - (2) NCC.GEN.150, or
 - (3) SPO.GEN.150.
- (e) When the aircraft operator holds a specific approval to transport dangerous goods, the provisions of Subpart SPA.DG. also apply to the GH organisation as a contracted service provider.

SUBPART 1 – PASSENGER HANDLING

GH.OPS.100 Passenger handling

- (a) The passenger handling and baggage acceptance procedures shall cover the safety risks, including carriage of dangerous goods in passenger baggage or on the person, related to the following activities, as applicable:
- (1) passenger and baggage acceptance and data communication to load control office,
 - (2) handling of passengers with reduced mobility,
 - (3) passenger boarding,
 - (4) passenger disembarkation, including, if applicable, handling of transit and transfer passengers.

- (b) The GH organisation shall ensure that the aerodrome requirements related to the control of pedestrians are observed during passenger boarding and disembarkation.

Rationale

The term 'passengers with reduced mobility' is used throughout this draft regulation to align with Regulation No (EC) 1107/2006 (see Article 2 Definitions).

AMC1 GH.OPS.100 Passenger handling

HANDLING OF PASSENGERS WITH REDUCED MOBILITY (PRM)

- (a) The safe handling of PRM should cover the following aspects:
- (1) The PRM should be handled and escorted always by qualified and trained service personnel. They may not be left alone or in the sole company of their accompanying persons, especially during the boarding operations. This can be achieved by using an ambulift or other type of vehicle that grants the comfort and safety of the passenger and their escorts.
 - (2) Only suitable equipment fit for purpose is used for the carriage of PRM;
 - (3) The procedure should avoid overloading one individual with handling of both the PRM and their baggage;
 - (4) The transfer point of the mobility equipment should be, unless justified otherwise, the aircraft door. In all cases, the transfer should be made in the presence of the PRM disabilities so that, from that moment on, the equipment will only be handled by the ramp services of the GH organisation;
 - (5) The passenger boarding bridge is not obstructed during boarding/deplaning because of massed carry-on baggage and queueing wheelchairs.
- (b) The procedures should include any specific instructions provided by the aircraft operator or aerodrome operator for the handling of PRM.

GM1 GH.OPS.100 Passenger handling

PASSENGERS WITH REDUCED MOBILITY (PRM)

- (a) The responsibility to ensure the provision of assistance to PRM at the airport remains with the aerodrome operator as per Regulation (EC) No 1107/2006. That Regulation also specifies the possibility that the assistance services are provided by the aerodrome operator or contracted to another provider.
- (b) Likewise, the responsibility for the provision of assistance to PRM and for adequate training for personnel remains with the aerodrome operator as specified by Regulation (EC) No 1107/2006.
- (c) This Regulation does not contradict or duplicate any applicable requirements regarding the rights of PRM when travelling by air.

SUBPART 2 – BAGGAGE HANDLING

GH.OPS.200 Baggage handling

- (a) The safety procedures for baggage handling shall cover at least the main phases, as applicable:
 - (1) baggage identification,
 - (2) baggage sorting,
 - (3) baggage building, preparation for departure or transfer,
 - (4) baggage arrival and reconciliation.
- (b) The handling of dangerous goods in baggage shall be performed as per the Technical instructions.
- (c) The GH organisation may be required to comply with additional aerodrome procedures, depending on the infrastructure provided by the aerodrome operator for baggage handling.

SUBPART 3 – AIRCRAFT HANDLING

GH.OPS.300 Safety on the ramp

As safety risk mitigations to address the safety risks in the provision of GH services, the GH organisation shall use its SMS including the safety culture, safety communications and reporting, operational procedures, personal protection equipment, and training. The GH organisation shall encourage the personnel to report any deviations from the operational procedures, irregularities in operation or near-miss events that cause or may cause injuries to persons or damage to the aircraft or other vehicles.

The GH organisation shall implement operational procedures to cover the safety risks of working around the aircraft and on the aerodrome airside safety area, as follows:

- (a) The aerodrome procedures regarding the following activities:
 - (1) walking and driving within the aerodrome airside areas;
 - (2) foreign object debris (FOD) programme;
 - (3) driving on the movement area;
 - (3) operations in adverse weather conditions, in winter or at night.
- (b) The GH organisation's operational procedures regarding the following activities:
 - (1) working on the apron and around the aircraft – safety on the ramp;
 - (2) inspection of aircraft exterior and adjacent airside areas, as appropriate, prior to aircraft arrival and departure ground movement activities;
 - (3) working around the aircraft: aircraft danger areas shall be kept clear of persons and vehicles while engines are about to be started or are running. Persons shall not walk or approach the engine ingestion and blast areas when the engines are about to be started or are running and the anti-collision lights are on, except when the auxiliary power unit is inoperative. The procedure shall include human factor principles;

- (3) correct positioning of the ground support equipment around the aircraft for aircraft servicing and passenger disembarking and boarding;
- (4) turnaround plan: depending on the responsibilities assigned to the organisation, either of the following:
 - (i) develop and implement a turnaround plan to ensure coordination and safety of all GH activities occurring at the aircraft during turnaround. It shall include, as a minimum, a description of the phases, as well as tasks and responsibilities required for the arrival, handling, and departure of the aircraft;
 - (ii) describe its tasks and responsibilities during turnaround when the plan is developed by another organisation.

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

PROCEDURES FOR ADVERSE WEATHER CONDITIONS

These procedures should cover at least the following situations:

- (a) Slippery apron conditions,
- (b) Storms-lightning,
- (c) High winds,
- (d) Low visibility,
- (e) Sandstorm,
- (f) Intense heat,
- (g) Freezing conditions.

GH.OPS.310 Ground support equipment – general

- (a) The GH organisation shall implement procedures for operating the GSE, with specific safety actions to address the risk for equipment approaching, manoeuvring, parking and departing from the aircraft and the area where the aircraft is being serviced, including the equipment used for the ground transport of passengers with reduced mobility.
- (b) Driving of GSE on the apron and movement area shall observe the aerodrome procedures developed in accordance with the applicable requirements of Annex IV (ADR.OPS) to Regulation (EU) No 139/2014.
- (c) All GSE used – motorised and non-motorised – shall be appropriately maintained and compliant with maintenance programme described in Subpart ORGH.GSE of Annex III to this Regulation. The passenger boarding bridges or passenger stairs shall be clear of any FOD to ensure swift evacuation of passengers and crews in case of an emergency during refuelling with passengers on board, embarking or disembarking.
- (d) A no-touch policy shall be applied.

Rationale

This implementing rule is kept generic. More GM and AMC are expected to be developed once the occurrence reports will reveal the root causes of the events involving equipment used for passenger boarding, aircraft loading/unloading, aircraft de-icing/anti-icing, etc.

GM1 GH.OPS.310(d) Ground support equipment – general

NO-TOUCH POLICY

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

GH.OPS.315 Aircraft refuelling and defueling

- (a) The aircraft refuelling and defueling services may be provided by the same organisation responsible for the provision of other GH services or by a different GH organisation called an into-plane fuelling service provider.
- (b) In addition to compliance with point GH.OPS.005, the provider of refuelling and defueling services shall be responsible for the following:
 - (1) ensure safe provision of aircraft refuelling and defueling and other necessary services in accordance with the operational procedures of the aircraft operator;
 - (2) ensure effective intervention in the event of an emergency during refuelling or defueling;
 - (3) ensure there is a fuelling supervisor, appointed as per the aircraft operator's procedure. This person shall be responsible for the overall safety during refuelling and shall remain in the area where refuelling is taking place;
 - (4) use only the fuel type approved for the aircraft type in accordance with the aircraft operator's instructions and prevent any misfuelling;
 - (5) have and implement communication procedures with the GH organisation providing the other services during aircraft turnaround and with the aircraft crew in case of fire and fuel leakage;
 - (6) wear distinctive clothing to enable their easy identification in case of an emergency during refuelling or defueling operations.
- (c) The provider of refuelling and defueling services shall:
 - (1) observe the requirements regarding fire prevention and extinction on the apron and at the parking stands;
 - (2) observe the refuelling zones as established by the aerodrome operator and according to the aircraft type, and prevent access of any passengers or unauthorised persons to enter those zones;
 - (3) comply with the relevant requirements of Regulation (EU) No 965/2012 and the aerodrome operator procedures, if in place, for refuelling or defueling with passengers on board, embarking or disembarking, including:

- (i) keep clear of obstacles the designated emergency exits and escape routes, as well as the ground area beneath the aircraft exits intended for emergency evacuation and slide deployment areas when stairs are not in position for use in the event of an evacuation;
 - (ii) communication between the fuelling supervisor and the person assigned by the aircraft operator to manage the evacuation of passengers;
- (4) address any conflicting instructions with the aircraft operator or the aerodrome operator, as the case may be, as soon as they have been identified.

AMC1 GH.OPS.315 Aircraft refuelling and defueling

REFUELLING AND DEFUELING OPERATIONS

When several GH organisations perform different aircraft handling services, including fuelling and defueling performed by an into-plane fuelling agent, the GH organisations should have and apply common procedures to ensure the following:

- (a) Interaction and communication with the provider of the into-plane fuelling services at the aircraft during turnaround and refuelling operations. The purpose is to ensure safety of operations during turnaround, smooth coordination of actions and evacuation in case of an emergency, while maintaining compliance with the aerodrome operator procedures and aircraft operator procedures for aircraft refuelling.
- (b) The designated emergency exits and escape routes are kept free of obstacles during refuelling with passengers on board, embarking or disembarking.

GM1 GH.OPS.315 Aircraft refuelling and defueling

RECOMMENDED GUIDANCE FOR REFUELLING AND DEFUELLING

- (a) The ICAO Doc 9977 'Manual on Civil Aviation Jet Fuel Supply' could be used for further reference.
- (b) The GH organisation may also use the standards and instructions put forward under the Joint Inspection Group (JIG) in relation to the aviation fuel supply standards and the IATA GOM.
- (c) For the ground crew supervising the refuelling, the procedure should be aligned with the aircraft operator procedure and should ensure that the ground crew supervising the refuelling operations meet at least the following conditions:
 - (1) are trained in communication method(s) used and their responsibilities;
 - (2) warn the qualified person on board of fire, advice on which exits to use during evacuation;
 - (3) stop refuelling if the aircraft exits are blocked, there is fuel spillage, or there are other risks identified.

GM2 GH.OPS.315 Aircraft refuelling and defueling

INTERFACES WITH AIRCRAFT OPERATOR AND AERODROME OPERATOR RESPONSIBILITIES

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

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

GH.OPS.320 Refuelling infrastructure

- (a) The GH organisation shall ensure that the refuelling infrastructure is functional and safe for aircraft refuelling and the fuel quality is in accordance with the aerodrome requirements.
- (b) The GSE requirements shall apply to the aircraft refuelling truck or cart.

GM1 GH.OPS.320 Refuelling infrastructure

GENERALITIES

- (a) The refuelling infrastructure refers to fuel hydrant dispenser at an aerodrome and aircraft refuelling trucks.
- (b) The GH organisation should ensure that the components of the infrastructures used at an aerodrome are in functional conditions for safe refuelling and defueling of the aircraft. The requirements for GSE maintenance regarding the fuel truck apply.
- (c) The GH organisation should ensure any necessary arrangements with the aerodrome operator for fuel storage at the aerodrome.

GH.OPS.325 Alternative energy sources of propulsion

- (a) Electric aircraft
 - (b) Other types of energy source of propulsion
- [placeholder]

GM1 GH.OPS.325 Alternative energy sources of propulsion

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

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

GH.OPS.330 Potable water servicing

The procedure shall comply with the requirements of GH.OPS.005 and shall cover the following additional aspects:

- (a) all water, for drinking and other personal use, uplifted into the aircraft is free from chemical substances and microorganisms;
- (b) liaise with the aerodrome operator to ensure potable water quality test is conducted periodically in accordance with the local health authorities and as per aircraft operator's procedure;
- (c) the mandatory requirements regarding personal protection equipment for the personnel performing potable water servicing are observed;
- (d) the risk of producing FOD during this activity is properly mitigated.

GH.OPS.335 Aircraft toilet servicing

The procedure for the aircraft toilet servicing shall comply with the requirements of GH.OPS.005 and shall cover the following additional aspects:

- (a) the applicable measures in case of leakage are described;
- (b) any leakage is promptly identified and handled according to the instructions;
- (c) the mandatory requirements regarding personal protection equipment for the personnel performing aircraft toilet servicing are observed;
- (d) the risk of producing FOD during this activity is properly mitigated.

GH.OPS.340 Aircraft exterior cleaning

The procedures for the aircraft exterior cleaning shall comply with the requirements of GH.OPS.005 and shall cover the following additional aspects:

- (a) the aircraft cleaning is performed with products approved by the aircraft manufacturer to avoid damage to the aircraft;
- (b) the aircraft panels and doors are properly closed after completing the cleaning;

- (c) the mandatory requirements regarding personal protection equipment for the personnel performing aircraft cleaning are observed;
- (d) the use of dedicated area for this activity, as established by the aerodrome operator, if applicable;
- (e) the risk of producing FOD during this activity is properly mitigated.

GH.OPS.345 Loading of catering

- (a) The GH organisation shall comply with the requirements of GH.OPS.005. It shall apply operational procedures to cover the operation of the catering truck or any elevating equipment to the aircraft and around it.

Rationale

Catering loading operations are regulated only with regard to the safety of the flight, and this involves the operation of the loading/unloading equipment moving to/from the aircraft and around it. The general requirements applicable to GSE, as well as the management system requirements regarding training and the development of a scalable SMS for this operation will apply in this case.

GH.OPS.350 Aircraft de-icing and anti-icing – generalities

- (a) In addition to compliance with point GH.OPS.005, the GH organisation shall be responsible to ensure that the fluids used for de-/anti-icing are complying with the fluid quality standards and that periodic testing is performed.
- (b) The GH organisation shall comply with the applicable de-icing/anti-icing requirements of Regulation (EU) 965/2012 on air operations.
- (c) The GH organisation shall cooperate with the aerodrome operator and any relevant authority and organisation to enable the recovery and recycling of the de-icing/anti-icing fluid for environmental protection purposes.
- (d) When the GH organisation has allocated remote platforms and stands to provide de-/anti-icing services, it shall appoint a de-icing coordinator and implement a procedure to include:
 - (1) communication on a dedicated radio frequency with the flight crew;
 - (2) stand allocation for aircraft awaiting the de-icing/anti-icing service at the de-icing/anti-icing stand;
 - (3) indicate to the flight crew the removal of equipment and end of de-icing/anti-icing operation for a safe return of the aircraft to the movement area.

Rationale

This implementing rule is kept generic in the first issue of the GH regulation. This is because this activity is complex and requires dedicated time and deep analysis of the current situation including existing regulations, existing industry standards, as well as the identification of the root cause of the reported occurrences. EASA will extend work on this section in the future.

GM1 GH.OPS.350 Aircraft de-icing and anti-icing – operations

ROLES AND RESPONSIBILITIES

The GH organisation should define the responsibilities for de-icing/anti-icing activities in alignment with the existing industry standards and good practices, using SAE AS6285:

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

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

- (1) Use of suitable de-icing/anti-icing treatment method according to SAE AS6285.
- (2) Remote de-icing/anti-icing instructions, when applicable.
- (3) Sufficient number of trained and competent de-icing/anti-icing personnel.
- (4) Qualified staff to coordinate and supervise the de-icing/anti-icing treatments.
- (5) Use of suitable de-icing/anti-icing equipment meeting the specification of ARP1971.
- (6) Special handling procedures for Type II, III, and IV de-icing/anti-icing fluids to maintain quality.
- (7) Post-de-icing/anti-icing check, when applicable.
- (8) Protocol for communications with the flight crew for the gate and, when applicable, remote locations.
- (9) Reporting the anti-icing code to the flight crew, when applicable.
- (10) Documentation of all de-icing/anti-icing treatments.
- (11) Personnel safety arrangements.
- (12) Provisions for tools and clothing for de-icing/anti-icing personnel.
- (13) Environmental arrangements.
- (14) A quality control programme.

GH.OPS.360 Ground handling for helicopters

[placeholder]

Rationale

As the EASA expert group on ground handling did not benefit from helicopter expertise, there are no requirements proposed for ground handling for helicopter in the first issue of the GH regulation.

SUBPART 4 – AIRCRAFT TURNAROUND

GH.OPS.405 Coordination of turnaround activities

- (a) The GH organisation shall take into consideration the turnaround plan as specified by the aircraft operator to facilitate the coordination of all activities during the turnaround process, including aircraft-type specific requirements and aircraft limitations.
- (b) If the coordination of turnaround activities is required in writing by the aircraft operator, the GH organisation shall ensure safe coordination of turnaround activities to minimise the risk of damage to the aircraft, other vehicles on the ground and injuries to persons, to ensure safety of the flight.
- (c) The GH organisation shall have a written procedure to describe the following aspects:
 - (1) elements that need to be observed;
 - (2) whether this activity is performed by a person or an automated device;
 - (3) who is responsible for this activity;
 - (4) tasks associated to this function;
 - (5) ensure that the amount of tasks per person does not jeopardise the safety of activities;
 - (6) the procedure is disseminated to all the persons involved.
- (d) The turnaround procedure applied to each aircraft shall observe the aircraft type and aircraft limitations.
- (e) The GH organisation shall observe the requirement to alert the aerodrome emergency services as per ADR.OPS.D.050 for accidents and incidents on the apron.

Rationale

Turnaround coordination requires planning. However, the rule should provide enough flexibility for the aircraft operator and the GH organisation that provide services to an aircraft to decide how this coordination will take place, especially in the case when an aircraft is serviced by more than one GHS. The turnaround coordination activity should not be mandatory for a GH organisation that provides only some but not all of the turnaround services.

An aircraft may be serviced by more than one GH organisation during turnaround; ground handling services could be much fragmented per different service providers. For example, services like fuelling, baggage and cargo loading and unloading, toilet and water services, catering, passenger handling, de-icing, pushback/towing could be provided by several individual GH Organisations. Therefore, it is important that all turnaround activities are well planned and coordinated to minimise the flight safety risk, the risk of damage to the aircraft, other vehicles and injuries to persons providing those services, but also to ensure on-time servicing.

Today, turnaround coordination is an activity that may or may not be requested by the aircraft operator through its service level agreement with its GH organisations. However, the safety of these activities needs to be ensured at all times. The GH organisation and the aircraft operator may decide how they plan to ensure this service.

AMC1 GH.OPS.405 Coordination of turnaround activities

GENERAL

- (a) The turnaround activities may be coordinated by one or more persons or by means of artificial intelligence.
- (b) The following GH activities should be considered for the turnaround coordination, as agreed with the aircraft operator to which this service is provided:
 - (1) aircraft arrival,
 - (2) GSE operation around the aircraft, including PBB, passenger stairs, and loading equipment for cargo operations,
 - (3) aircraft loading/unloading,
 - (4) passenger disembarkation and boarding, including passengers with reduced mobility,
 - (5) ground transportation of passengers, crews, baggage and cargo,
 - (5) aircraft refuelling,
 - (6) potable water, aircraft toilet servicing,
 - (7) catering unloading/loading,
 - (8) aircraft departure activities,
 - (9) aircraft pushback/towing,
 - (10) aircraft de-icing/anti-icing when not done at a remote stand,
 - (11) coordination and communication with the GH services indicated above and with Load Control,
 - (12) coordination and communication with the aircraft operator flight crew, aerodrome operator, and any other organisations involved in the GH activities and preparation of the flight, as the case may be.

Rationale:

The request to have a turnaround coordinator is the aircraft operator's choice and it is specified in its procedures for aircraft handling. On the other hand, an aircraft operator might ask itself whether it would be comfortable without a coordination of the turnaround activities or if it has arranged for other processes to mitigate the potential risks.

GH.OPS.410 Aircraft arrival

- (a) The operational procedures shall be appropriate to the aircraft type and shall cover, as applicable:
 - (1) securing of the aircraft on the ground,
 - (2) marking the aircraft danger zones,
 - (2) operation of cargo hold doors and service panels,
 - (3) positioning of the GSE, including the ground power unit and pre-conditioned air unit if applicable,

- (4) operation of passenger boarding bridges or passenger air stairs.
- (b) If the GH organisation performs aircraft marshalling services, it shall comply with the applicable requirements of Regulation (EU) 139/2014 for apron management services and marshalling of aircraft.

AMC1 GH.OPS.410 Aircraft arrival

INSPECTION OF THE PARKING STAND

- (a) The GH organisation should ensure that the assigned parking stand is checked prior to aircraft arrival for the following:
 - (1) FOD,
 - (2) Stand surface conditions,
 - (3) Stand free of GSE and personnel other than those required to assist the aircraft arrival at the aircraft stand, airbridge fully retracted.
- (b) These tasks should not be understood to contradict the applicable requirements of Regulation (EU) 139/2014 related to aircraft parking.

GH.OPS.415 Aircraft securing on the ground

- (a) The GH organisation shall have and implement operational procedures to ensure that the aircraft is secured against any unintended movement. in accordance with the aircraft operator's SOPs or, as agreed with the aircraft operator, in accordance with its own procedures.
- (b) GH personnel shall wait for the anti-collision lights to be off and the engines shut before approaching the aircraft.
- (c) The equipment restraint area shall be marked by placing safety cones around the aircraft areas that are susceptible to ground damage.

GH.OPS.420 Aircraft loading and unloading

The operational procedures for aircraft loading and unloading shall ensure the following:

- (a) The loading is performed in accordance with the written loading instructions provided by Load Control and any loading specifications and requirements related to dangerous goods and to other special cargo, mail or baggage items are observed.
- (b) The aircraft stability is maintained during unloading and loading.
- (c) The aircraft cargo hold is empty prior to loading unless aircraft operator instructions state otherwise, and there are no damages or leaks. This step does not apply fully to transit flights. If damages are identified, the aircraft operator shall be informed.
- (d) The ULD loading is performed so as not to damage cargo hold doors or cargo hold.
- (e) The items and ULD loaded in the cargo compartments are properly secured to prevent any movement or shifting during flight.

- (f) The ULD type loaded on the aircraft corresponds to the loading instructions/report.
- (g) Any last-minute changes related to baggage or cargo loading are transmitted to Load planning office and the commander/pilot-in-command. The loading report is signed by the loading supervisor upon completion of aircraft loading.
- (h) Once the unloading is complete, the person in charge checks the cargo compartment(s) to ensure all items have been unloaded, as applicable.
- (i) Loading and unloading are executed with GSE adequate to the aircraft type and task, as the case may be.
- (j) There are procedures in place to notify damages or malfunctions to the in-plane loading system and of the entire aircraft.

Rationale

This proposed rule is more detailed, in response to the EASA Annual Safety Reviews of the past 5 years, which indicated that this activity is ranked high in the classification of occurrences as far as frequency and potential risk to damage the aircraft are concerned.

GM1 GH.OPS.420(c) Aircraft loading and unloading

AIRCRAFT CARGO HOLD

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

Rationale

This GM is proposed to clarify the case when the aircraft cargo load is not completely empty upon loading the cargo and baggage for a new flight. The aircraft operator instructions and procedures should include instructions about this as well. A new AMC related to operator instructions and procedures for ground handling, drafted in a broader sense, is proposed to be added to Reg. (EU) 965/2012) to cover this aspect (see new AMC3 ORO.GEN.110(f)) in Annex 2 to this NPA).

AMC1 GH.OPS.420 Aircraft loading and unloading

LOADING AND UNLOADING OF DANGEROUS GOODS – MITIGATIONS

- (a) Procedures for aircraft loading/unloading
 - (1) Prevention of damage to packages, ULD (pallets and containers);
 - (2) Consolidation of dangerous goods to comply with the ICAO Technical Instructions;

- (3) Separation and segregation of packages to prevent interaction between incompatible DG and other cargo;
 - (4) Prevention of movement during ground transport and during flight;
 - (5) Prevention of shipments labelled CAO (cargo aircraft only) from being loaded on passenger aircraft.
- (b) Procedures for damaged or leaking packages
- (1) Not to be loaded into an aircraft;
 - (2) Unloaded from the aircraft, if already loaded following DG procedures and apply procedure appropriate to the DG type;
 - (3) In case of leakage, check for other contaminated packages and assess if they can be transported;
 - (4) Apply any additional procedures, including reporting, of the aircraft operator and aerodrome operator, as the case may be;
 - (5) Procedure for the notification to captain (NOTOC) delivery to the commander/pilot-in-command.

GH.OPS.425 Loading supervision

The GH organisation shall implement procedures for the supervision of aircraft loading and unloading to ensure the following:

- (a) Monitor the aircraft unloading, and loading,
- (b) Verify the steps of the procedures referred to in point GH.OPS.430.
- (c) Check the load against the related documentation cargo manifest or baggage manifest, if available.
- (c) Confirm loading is carried out as specified by the final Loading Instruction/Report (LIR).
- (d) Report any deviations from the planned loading and any special, overweight or non-standard items presented for loading not already included in the LIR.

GH.OPS.430 Unit load devices

The GH organisation shall ensure the following with regard to the unit load devices (ULDs) in the form of aircraft containers, for both baggage and cargo load:

- (a) The aircraft operator instructions are followed with regard to the correct use of the ULD type. ULDs are within the acceptable limits established according to the manufacturer instructions and empty before use.
- (b) The ULDs are checked to ensure they are serviceable before the build-up and do not exceed the allowed serviceability limits.
- (c) Unserviceable ULDs are labelled and taken out of use.
- (d) Arrangements are in place with the ULD owner for the repair or disposal of damaged ULDs.

- (e) The ULD build-up process observes the operational procedures related to all the following:
 - (1) aircraft mass and balance and ULD limitations,
 - (2) use of adequate ULDs regarding the size, type, structural suitability for shipping,
 - (3) interlocking and restraining of load within each pallet or container to prevent its movement during flight,
 - (4) segregation of dangerous goods,
 - (5) integrity of the load and the ULD.
- (f) Each ULD is identified by unique identification codes or markings.
- (g) The ULDs are stored in conditions that prevent their damage. Storage on the ground is not permitted.
- (h) The ULDs are safely transported and handled to prevent damages to the ULD and the load, the aircraft or other vehicles or equipment and injuries to persons.
- (i) The ULDs are properly secured to avoid uncontrolled movements in adverse weather conditions.
- (j) The ULDs are checked and damages are reported to the aircraft operator according to aircraft operator instructions.
- (k) Personnel involved in ULD handling are properly trained.

GH.OPS.435 Aircraft departure activities

- (a) The GH organisation shall coordinate the aircraft departure with the other organisations involved in this activity.

AMC1 GH.OPS.435 Aircraft departure activities

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

- (4) Pushback or towing procedures include correct pushback or towing equipment for aircraft type/subtype and other conditions specific to the operational context.

GM1 GH.OPS.435(b) Aircraft departure activities

- (a) Other organisations involved in the activities preparing the aircraft departure from the stand can be the aerodrome operator, the air traffic service provider, or the provider of apron management services.
- (b) The apron management services are responsible for coordinating the radio communication with the ATC for parking, taxiing, pushback, but not with the actual execution of the pushback service. Marshalling services – regardless of who is doing them, will comply with Regulation (EU) 139/2014 as regards the training and with the hand-signs and communications from Regulation (EU) 923/2012.

Rationale

Flexibility to adjust procedures whenever necessary, so that different types and sizes of operators can develop adequate procedures.

GH.OPS.440 Aircraft towing and pushback

- (a) The responsibility for the aircraft towing/pushback operations is split between several organisations. The GH organisation is responsible for the following:
- (1) correct implementation of the operational procedures related to aircraft towing and pushback in accordance with the aircraft operator's operational procedures or, as agreed with the aircraft operator, in accordance with its own operational procedures per aircraft type and towing/pushback vehicle type. The equipment manufacturer instructions for the operation of the towing equipment, if applicable, shall also be observed;
 - (2) communication procedures with the other persons involved in the towing or pushback operation;
 - (3) connecting and disconnecting the aircraft to/from the vehicle/towbar;
 - (4) driving or remotely controlling the towing/pushback vehicle;
 - (5) maintaining communication to the wing person and alerting flight crew of the loss of communications during pushback/towing; this step shall be properly coordinated with the provider of apron management services;
 - (6) training and continued competence of its personnel performing these activities,
 - (7) operation and maintenance of any GSE used for the towing/pushback in accordance with Subpart ORGH.GSE.
- (b) The GH organisation shall apply the aerodrome procedures established by the aerodrome operator in accordance with the provisions of Regulation (EU) 139/2014 in relation to aircraft ground movements and, if applicable, the established communication and phraseology as per the standardised rules of the air (SERA) requirements.

GM1 GH.OPS.440 Aircraft towing and pushback

TOWING PURPOSES

Aircraft towing may have different purposes:

- (a) maintenance – towing an aircraft, for maintenance purposes, without passengers, without cargo, with minimum fuel on board;
- (b) operational/dispatch – towing an aircraft loaded with passengers and/or fuel, and/or cargo, to/from the terminal gate or parking area, to/from a remote location;
- (c) repositioning – the movement of an aircraft to/from remote parking purposes. An aircraft may be loaded with cargo or fuel.

GM2 GH.OPS.440 Aircraft towing and pushback

V-TOL AIRCRAFT

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

Rationale

Further GM may follow with the development of V-TOL aircraft operations in the future.

GH.OPS.445 Communication and phraseology

The communication between the flight crew and the ground person responsible for the aircraft pushback shall ensure safe operation of the aircraft and its occupants and of the persons and vehicles on the ground.

SUBPART 5 – LOAD CONTROL

GH.OPS.500 Load planning, mass and balance calculations, load control messages and communications, and load control document issuance

- (a) The GH organisation shall provide load control services in accordance with the aircraft operator's instructions and procedures.

- (b) The GH organisation shall also comply with the relevant requirements of Regulation (EU) 965/2012 related to mass and balance and the load control process.

SUBPART 6 – CARGO AND MAIL HANDLING

GH.OPS.600 Cargo and mail handling – general

- (a) The GH organisation shall have and implement operational procedures for the safe transport of cargo and mail to cover the following steps:
- (1) acceptance of shipment on behalf of the aircraft operator and preparation for the flight in accordance with the applicable requirements and aircraft operator procedures, including:
 - (i) any necessary checks, such as security checks;
 - (ii) cross-checks of the cargo against the accompanying documentation on behalf of the aircraft operator;
 - (iii) planning the build-up;
 - (2) final build-up of cargo, if this was not performed before its arrival at the cargo terminal, and storage of cargo before the flight;
 - (3) transportation of the cargo shipment to/from the aircraft.
- (b) The activities listed in point (a)(1) and (2), when performed at a cargo warehouse located at the aerodrome or adjacent to it, shall be subject to compliance with this Regulation.
- (c) Notwithstanding point (a), the GH organisation shall apply the operational procedures provided by the aircraft operator unless agreed otherwise with the aircraft operator.
- (d) The cargo operations may be performed together by the qualified personnel of the GH organisation and the aircraft operator, as priorly agreed.

Rationale

The issue of whether to extend the application of this Regulation to cargo warehouse activities has been thoroughly discussed by EASA with the GH expert group. The main aspects of this debate are highlighted below.

Cargo activities occur indoors, usually in a warehouse. However, not all activities occurring in a warehouse are related to flight safety. Many of them are covered by other requirements, such as security aspects, or health and safety of personnel, the latter being covered by the Member States at national level.

The cargo-related activities with relevance to the flight safety are load control, ground transportation, build-up of ULDs, dangerous goods in cargo, and aircraft loading/unloading. The load control activities are under the responsibility of the aircraft operator, included in the Air Ops Regulation (EU) 965/2012. The safety of ground transportation of cargo is sufficiently covered by the Aerodrome Regulation (EU) 139/2014. Aircraft loading/unloading and the operation of GSE for cargo purposes are covered by the GH Regulation in the relevant sections related to these activities, not specifically on cargo.

What remains to be covered by this section are the activities related to the preparation of cargo for the flight: verification of conformity between the accepted cargo and the related documentation, verification of the cargo integrity, cargo build-up, ground transportation between the cargo terminal and the aircraft. Dangerous goods requirements will apply at all times.

So, when these cargo activities (which are relevant for the flight safety) are performed at a warehouse, they are proposed to be kept in the scope of the GH regulation.

The second problem to be solved is linked to the equal treatment of these activities kept in the scope of the GH regulation when performed in a warehouse at the aerodrome premises and when performed outside the aerodrome premises. Regulation (EU) 2018/1139 (The Basic Regulation) sets the boundaries of application of the GH Regulation to the aerodrome premises. Thus, warehouses located inside the perimeter of an aerodrome would be in the scope of the GH Regulation, whereas warehouses located outside an aerodrome, e.g., across the street from an aerodrome, would be outside the scope. There is no safety discriminant between the two. To solve this problem, it is proposed that the safety-related cargo activities occurring at cargo warehouses located in the vicinity of the aerodrome are kept in the scope of this Regulation.

Since only the activities related to the safety of the flight are proposed to be covered, the draft rules do not extend to activities occurring after the cargo is unloaded from the aircraft and transported to the cargo warehouse.

GM1 GH.OPS.600 Cargo and mail handling

CARGO HANDLING ACTIVITIES IN A CARGO WAREHOUSE

- (a) The cargo warehouse in the scope of this Regulation is any cargo handling facility located at the aerodrome premises or adjacent to it (i.e., in its immediate vicinity), which is authorised for acceptance of cargo ready for carriage, storage and final build-up, and final checks before air transport.
- (b) The cargo warehouse activities are more diverse and cover more aspects of the cargo transportation chain than those related to the preparation of cargo to ensure flight safety.
- (c) The activities occurring at the cargo warehouse that are not directly related to points (a)(1) and (2) of GH.OPS.600 are not included in the scope of the GH Regulation.

GM1 GH.OPS.600(d) Cargo and mail handling

CARGO HANDLING ACTIVITIES INVOLVING QUALIFIED PERSONNEL OF THE AIRCRAFT OPERATOR

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

GH.OPS.605 Handling of special cargo

- (a) The GH organisation shall have and implement operational procedures for the handling of special cargo as provided by the aircraft operator or, when agreed with the aircraft operator, in accordance with its own operational procedures.
- (b) The handling and transport of dangerous goods shall comply with ICAO Annex 18 and the Technical Instructions.

GM1 GH.OPS.605 Special cargo

CARGO ITEMS

The following items are considered special cargo:

- (a) Pharmaceutical products,
- (b) Live animals,
- (c) Perishable items,
- (d) Fragile items,
- (e) Valuable cargo,
- (f) Diplomatic cargo,
- (g) Human remains,
- (h) Large and/or heavy items, such as parts of whole automobiles, train cars, aircraft parts, etc.,
- (i) Any other items that require special handling and/or transport.