

Acceptable Means of Compliance and Guidance Material to the Annex (Part-ARGH) to Commission Implementing Regulation (EU) 2025/23

Issue 1

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AMC AND GM TO THE ANNEX (PART-ARGH) TO COMMISSION IMPLEMENTING REGULATION (EU) 2025/23

SUBPART GEN — GENERAL REQUIREMENTS

AMC1 ARGH.GEN.100 Competent authority

COMPETENT AUTHORITY RESPONSIBLE FOR RECEIVING DECLARATIONS

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

GM1 ARGH.GEN.115 Oversight documentation

AVAILABILITY OF DOCUMENTATION

It is recommended that legislative acts, standards, rules, technical publications, guidelines and other similar documents be made available, in a timely manner, to the competent authority's personnel in various ways and formats.

AMC1 ARGH.GEN.120 Means of compliance

ALTERNATIVE MEANS OF COMPLIANCE

- (a) The competent authority may use alternative means of compliance (AltMoC) to establish compliance with Regulation (EU) 2018/1139 and its delegated and implementing acts.
- (b) The competent authority should establish a system to consistently check that the AltMoC 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 should include procedures to limit, revoke or amend AltMoC if the competent authority finds that these do not comply with Regulation (EU) 2018/1139 and its delegated and implementing acts.
- (c) The competent authority should evaluate the AltMoC proposed by GH organisations in accordance with point ORGH.GEN.120 of Commission Delegated Regulation (EU) 2025/20, by analysing the documentation provided and, if necessary, conducting an inspection of the organisations. When the competent authority finds that the AltMoC proposed by a GH organisation are in accordance with Regulation (EU) 2018/1139 and its delegated and implementing acts, it should inform the Agency of their content, including copies of the relevant documentation.

- (d) If the competent authority itself uses AltMoC to achieve compliance with Regulation (EU) 2018/1139 and its delegated and implementing acts, it should:
- (1) conduct a safety risk assessment of the AltMoC, which should demonstrate that compliance with Regulation (EU) 2018/1139 and its delegated and implementing acts is met;
 - (2) make the AltMoC available to the GH organisations under its oversight if those AltMoC are intended for use by GH organisations;
 - (3) notify the Agency without undue delay; and
 - (4) provide the Agency with:
 - (i) a full description of the AltMoC, including any revision to manuals or procedures that may be relevant; and
 - (ii) the safety risk assessment referred to in point (1).
- (e) AltMoC used by a competent authority or by a GH organisation under its oversight may be used by other competent authorities or GH organisations. However, they should be processed again in accordance with point (c) or (d), as applicable.

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

EXCHANGE OF SAFETY-SIGNIFICANT INFORMATION WITH THE AGENCY

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

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

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

'Safety-significant information stemming from occurrence reports' means a safety analysis summarising individual occurrence data and providing an in-depth analysis of a safety issue, which may be relevant to the Agency's safety-related action planning.

More information can be found in the Guidance Material to Regulation (EU) No 376/2014², specifically Section 4 'Competent authorities' and in particular Section 4.3 'How is the information shared among the competent authorities?'

² [Easy Access Rules for Occurrence Reporting \(Regulation \(EU\) No 376/2014\) - Revision from December 2022 - Available in pdf & online format | EASA](#)

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

RECOMMENDED CONTENT FOR CONCLUSIVE SAFETY ANALYSES

A conclusive safety analysis contains the following elements:

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

and, as appropriate:

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

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

INFORMATION FOR THE AIRCRAFT OPERATORS CONCERNED

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

SUBPART MGM — MANAGEMENT SYSTEM

AMC1 ARGH.MGM.200 Management system

ORGANISATIONAL STRUCTURE

- (a) The competent authority should consider all the following elements when deciding on the required organisational structure for GH oversight:
 - (1) the number of declared GH organisations, including self-handling organisations;
 - (2) the number of aerodromes where the GH organisations operate;
 - (3) the possible use of qualified entities and the resources needed to fulfil the continuing oversight obligations;
 - (4) the size and complexity of the Member State's aviation industry;
 - (5) the economic trends indicating growth or decline of GH activities.
- (b) The set-up of the organisational structure should ensure that the various tasks and obligations of the competent authority do not rely solely on individuals. The continuing and undisturbed fulfilment of the tasks and obligations of the competent authority should also be guaranteed in the event of illness, accident or leave of individual employees.
- (c) The competent authority should take appropriate steps to ensure that the general policy on activities to implement the applicable requirements of Regulation (EU) 2018/1139 and its implementing and delegated acts is:
 - (1) disseminated to and understood by all personnel involved, and
 - (2) implemented and maintained.

GM1 ARGH.MGM.200 Management system

ORGANISATION AND GENERAL POLICY

- (a) It is recommended that the competent authority be organised in such a way that:
 - (1) there is specific and effective management authority in the conduct of all relevant activities;
 - (2) the functions and processes described in the applicable requirements of Regulation (EU) 2018/1139 and its implementing and delegated acts, AMC and GM can be properly implemented;
 - (3) the competent authority's organisational 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) specific and effective provision is made for communication and coordination, as necessary, with the Agency and the competent authorities of other Member States; and

- (5) all functions related to implementing the applicable requirements are adequately described.
- (b) The competent authority's general policy on activities to implement the applicable requirements of Regulation (EU) 2018/1139 and its implementing and delegated acts, while satisfying additional national regulatory responsibilities, takes 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 the industry, and
 - (4) the needs of the Agency and of the competent authority.
- (c) The policy defines specific objectives for key elements of the organisation and processes for implementing related activities, including the corresponding control procedures and the measurement of the standard achieved.

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

DOCUMENTED POLICIES AND PROCEDURES

- (a) The various elements of the organisation involved in the activities related to Regulation (EU) 2018/1139 and its implementing and delegated acts should be documented in order to establish a reference 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 identifiable, 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) coordination and communication internally and externally with relevant units or entities,
 - (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 conducted, and the referenced documentation should be readily available upon request.

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

CONTENT OF PROCEDURES

- (a) The Agency should have access, for standardisation purposes, to the competent authority procedures related to the management system and their amendments before conducting an inspection. Those procedures should provide at least the following information.
- (1) The competent authority's organisational structure, with a description of the main processes related to the oversight, including continuing oversight, and functions. 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 in line with the size and complexity of the Member State's GH industry. It should also consider the overall proficiency and scope of authorisation of the competent authority's personnel.
 - (2) How changes that significantly affect the competent authority's oversight capabilities are identified and dealt with.
 - (3) For personnel involved in oversight activities, the minimum requirements for professional qualifications and experience, and principles guiding the 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) Processes in place for disseminating applicable safety information to enable timely responses to a safety problem.
 - (6) Criteria for planning continuing oversight (the oversight programme), including adequate management of interfaces when conducting continuing oversight (e.g. with aerodrome operations and air operations oversight, or ramp inspections).
 - (7) Outline of the initial training of newly recruited oversight personnel (taking future activities into account) and of the basic framework for continuing training of oversight personnel.
- (b) The procedures in the competent authority's management system should include any amendments to those procedures.
- (c) As part of the continuing monitoring of a competent authority, in addition to the latest amendments of the elements listed in point (a), the Agency may request details of the working methods used, such as instructions or related guidance material used by the personnel conducting oversight.

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

INFORMATION SPREAD ACROSS SEVERAL DOCUMENTS

Organisational structure and job descriptions can be found in different documents from the ones containing the detailed working procedures.

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

SUFFICIENT PERSONNEL

- (a) This GM for the determination of the required personnel refers to the personnel of the competent authority required to fulfil oversight and enforcement responsibilities.
- (b) The elements to be considered when determining the necessary personnel and planning their availability can be quantitative or qualitative:
 - (1) quantitative elements:
 - (i) the number of organisations providing GH services, which have declared their activity to the competent authority;
 - (ii) the number of Member States and number of stations where the GH organisation provides services; and
 - (iii) the number of planned audits and inspections;
 - (2) qualitative elements:
 - (i) the size and complexity of the organisations responsible for the provision of GH services, taking into account:
 - (A) the range of GH services provided by an organisation,
 - (B) whether a GH organisation provides services locally (at one or more aerodromes in the same Member State) or in more than one Member State,
 - (C) organisational structure, existence of subsidiaries and number of contracted activities,
 - (D) whether an organisation is an independent GH service provider, an aircraft operator performing self-handling or providing GH services as an independent GH organisation, or an aerodrome operator providing GH services,
 - (E) whether a GH organisation or a self-handling aircraft operator is part of a single GH organisation business grouping or a single air carrier business grouping;
 - (ii) complexity of the GH services provided; for example, the complexity of aircraft exterior cleaning services in comparison with aircraft turnaround coordination or aircraft ground de-icing/anti-icing;
 - (iii) the safety priorities identified;

- (iv) 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) time frame for the implementation of corrective actions, and
 - (C) maturity of management systems implemented by organisations and their ability to effectively manage safety risks, taking into account information provided by other competent authorities related to activities in the territory of the Member States concerned; and
 - (v) the size and complexity of the Member State's aviation industry and the potential increase in 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) It is recommended gathering the following data 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 qualifications 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) Spreadsheet software may be used to process data defined under points (c) and (d), to assist in determining the total number of working hours/days per oversight planning cycle required for oversight and enforcement activities. Such software could also serve as a basis for implementing a system for planning the availability of personnel.
- (f) The following activities can be considered when determining the number of working hours/days per planning period for each qualified inspector:
- (1) purely administrative tasks not directly related to oversight,
 - (2) training,
 - (3) participation in other projects or tasks, such as oversight in other aviation domains,
 - (4) planned absence, and
 - (5) a reserve for unplanned tasks or unforeseeable events.
- (g) The elements listed above will enable the competent authority 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 qualifications of personnel and the required extent of oversight activities.

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

FACILITIES AND OFFICE ACCOMMODATION

Facilities and office accommodation include but are not limited to:

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

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

COMPLIANCE MONITORING PROCESS

The formal process for monitoring the compliance of the management system with the relevant requirements and the adequacy of the procedures should be the responsibility of a person or group of persons who:

- (a) have functional independence from the units/departments they oversee;
- (b) report to the senior management of the competent authority; and
- (c) have direct access to the senior management of the competent authority and to appropriate management personnel for safety matters.

AMC1 ARGH.MGM.200(b) Management system

PREREQUISITES FOR GH INSPECTORS

The persons appointed as GH inspectors, who have tasks related to oversight of GH organisations, should meet either of the following criteria:

- (a) have operational experience in any GH operations or another aviation domain, appropriate to the assigned tasks, as established by the competent authority; or
- (b) have auditing experience in GH or another aviation domain, which is relevant for the oversight of GH activities and organisations performing them, as established by the competent authority; or
- (c) if the person has no auditing or GH operational experience, the additional on-the-job training conditions in point (c) of AMC4 ARGH.MGM.200(b) should be complied with.

AMC2 ARGH.MGM.200(b) Management system

TRAINING PROGRAMME

- (a) The competent authority should establish a training programme including the assessment of its GH inspectors and a plan for its implementation.
- (b) The training programme should cover knowledge, skills and attitudes (KSAs) and should address specific needs of personnel and the competent authority.
- (c) For each inspector, the competent authority should:
 - (1) define the competencies required to perform the oversight tasks;
 - (2) conduct a training gap analysis before enrolling the inspector in the training programme, to ensure easy recognition of any prior experience, training and qualifications relevant to their function;
 - (3) establish initial and recurrent training programmes in order to maintain and enhance inspectors' competency to enable them to achieve 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.
- (d) The competent authority should have a process for enabling the recognition of an inspector's previous qualifications and experience in other aviation domains, when relevant to their future tasks and should apply only the necessary additional training to complete the inspector qualifications.

PROVISION OF TRAINING

- (e) The training may be provided either by the competent authority's own qualified trainers or by another suitable training source, which may be a training organisation or adequately qualified individuals.
- (f) The trainers should meet the competency and qualification criteria established by the competent authority and described in its documentation. Those criteria should include:
 - (1) relevant experience in GH operations, as established by the competent authority;
 - (2) relevant experience or competence in delivery of training (applying training techniques);
 - (3) communication skills;
 - (4) safety awareness skills;
 - (5) behavioural traits indicating professionalism, maturity, judgment, integrity and high personal performance standards.

AMC3 ARGH.MGM.200(b) Management system

INITIAL TRAINING FOR AUTHORITY INSPECTORS

- (a) Initial training should cover the KSA components as follows:
 - (1) The knowledge component should cover the content of this AMC.
 - (2) The skills component should cover audit/inspection techniques in specific areas of inspection.
 - (3) The attitude component should be developed throughout the training process, by monitoring the trainee inspectors' behaviours and attitudes during their assigned tasks and practical exercises and by adjusting the behaviours through discussions and feedback from the instructor throughout the training process.
- (b) The competent authority should ensure that the trainee inspectors have successfully completed the first phase of their initial training by passing an assessment with an appropriately qualified assessor.
- (c) After having successfully passed the first phase of the initial KSA training, the trainee inspector should undergo on-the-job training. The objectives are as follows:
 - (1) to familiarise the trainee inspector with the particularities of performing a GH audit/inspection in a real, operational environment, which should be done in accordance with AMC4 ARGH.MGM.200(b); and
 - (2) to monitor the KSA components in a 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 based on the previous qualifications and experience and competence they achieve.

CONTENT OF THE INITIAL TRAINING FOR AUTHORITY INSPECTORS

- (e) The initial training programme for inspectors should include the following content, to cover the KSA components, adjusted to their role, current knowledge, experience and skills.
- (f) The training programme should be updated, as needed, to reflect the latest changes in aviation legislation and the aviation industry.
- (g) AVIATION LEGISLATION
 - (1) the Chicago Convention and the relevant International Civil Aviation Organization (ICAO) Annexes and Documents;
 - (2) the relevant requirements of Regulation (EU) 2018/1139, including the enforcement measures specified in Article 62 points (1)(e) and (9);
 - (3) Commission Implementing Regulation (EU) 2025/23, Commission Delegated Regulation (EU) 2025/20, the relevant parts of Regulations (EU) No 965/2012, (EU) No 139/2014, (EU) 2022/1645, and other applicable aviation regulations, as well as the AMC and GM associated with those regulations;

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- (4) Regulation (EU) No 376/2014 on occurrence reporting and analysis and follow-up of occurrences in civil aviation and the related Commission Implementing Regulation (EU) 2015/1018;
 - (5) any other relevant international or national aviation legislation.
- (h) AUDITING TECHNIQUES
- (1) theory of audits and inspections, auditing and reporting techniques, as well as quality and safety assurance, including aspects of performing remote inspections;
 - (2) competent authority procedures relevant to inspectors' tasks;
 - (3) acceptability and auditing of management systems and the safety management system (SMS);
 - (4) methodology to assess AltMoC;
 - (5) rights and obligations of inspecting personnel of the competent authority.
- (i) TECHNICAL TRAINING PER GH ACTIVITY
- (1) technical training on specific GH activities as listed in Article 2 of Commission Delegated Regulation (EU) 2025/20, appropriate to the role and tasks of the inspector;
 - (2) dangerous goods;
 - (3) operation of ground support equipment (GSE), as applicable;
 - (4) security;
 - (5) other suitable technical training appropriate to the role and tasks of inspectors, including familiarisation with the applicable industry standards.
- (j) SMS TRAINING AND OTHER AREAS OF PARTICULAR INTEREST
- These include, but are not limited to:
- (1) management systems;
 - (2) assessment of the effectiveness of the SMS, in particular hazard identification and safety risk assessment, safety assurance principles and root cause analysis;
 - (3) accident and incident investigation training, with a focus on root cause analysis;
 - (4) non-punitive reporting techniques in the context of the implementation of a 'just culture';
 - (5) management of change;
 - (6) human factors principles.
- (k) AERODROME TRAINING FOR UNESCORTED ACCESS TO THE MOVEMENT AREA
- Unescorted access to the movement area and other operational areas of the aerodrome that are relevant to the oversight of GH activities, in accordance with the training for authority inspectors included in Regulation (EU) No 139/2014.

AMC4 ARGH.MGM.200(b) Management system

ON-THE-JOB TRAINING FOR INSPECTOR QUALIFICATION

- (a) The competent authority should ensure that on-the-job training is undertaken by trainee inspectors as part of their initial training, after they have successfully completed the first phase of their initial KSA training. On-the-job training should be conducted by 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 inspector 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. If the trainee inspector has no auditing or GH operational experience before starting the initial training, they should perform GH inspector tasks, including audits and inspections, under supervision for a longer period – as determined by the competent authority – before being allowed to work as a qualified GH inspector.
- (d) The scope and elements to be covered during the on-the-job training are as follows:
 - (1) preparation for an audit/inspection:
 - (i) sources of information for the preparation for 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) aerodrome access procedures,
 - (iii) airside safety and security procedures, and
 - (iv) briefing on the GH inspector toolkit (fluorescent vest, anti-electrostatic clothing, checklists, digital camera, torch, safety shoes, hearing protection, etc. depending on the case);
 - (3) audit/inspection:
 - (i) introduction (opening meeting),
 - (ii) on-site activities (audit/inspection according to the area of expertise of the trainee),
 - (iii) findings (identification, categorisation, evidencing, reporting), and
 - (iv) corrective actions (enforcement);

- (4) closing meeting (debrief on the conclusions of the audit/inspection);
 - (5) preparation, completion and delivery of the audit/inspection report;
 - (6) human factors 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.
- (e) The trainee GH inspector should be assessed by the GH inspector who provides the training. A trainee GH inspector should be considered to have successfully completed their on-the-job-training only after demonstrating to the GH inspector who provides the training that they possess the professional competence, knowledge, judgement and ability to perform GH inspections and audits in a real, operational environment, in accordance with the applicable requirements.
- (f) The competent authority should ensure that the trainee GH inspector has achieved the required competence before they are authorised to perform their role without supervision.

AMC5 ARGH.MGM.200(b) Management system

QUALIFICATION OF INSPECTORS AFTER SUCCESSFUL COMPLETION OF INITIAL TRAINING

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

AMC6 ARGH.MGM.200(b) Management system

CONTINUED COMPETENCE OF INSPECTORS

- (a) Once an inspector is qualified, the competent authority should ensure that they maintain their qualification and remain competent to perform the allocated tasks. This should be done by developing and implementing a process for recurrent training and assessment. The recurrent training and assessment should take place at regular intervals, of no longer than 36 months.
- (b) The recurrent training programme should address, as appropriate to the role of the inspector, at least the following aspects:

- (1) changes in legislation, the operational environment and technologies in the field of aviation;
 - (2) competent authority procedures relevant to the inspector's tasks;
 - (3) technical training, including training on GH-specific subjects, appropriate to the role and tasks of the inspector; and
 - (4) results from past oversight.
- (c) Training courses with a fixed interval for recurrence established through another regulation (e.g. dangerous goods training) should be maintained as such.
- (d) The training to ensure continued competence of inspectors may include, whenever possible, an exchange scheme for inspectors from different Member States, to enable the efficient implementation of cooperative oversight and the standardisation of the oversight process while improving or maintaining inspectors' competence.

AMC7 ARGH.MGM.200(b) Management system

RECENT EXPERIENCE TO MAINTAIN QUALIFICATION OF GH INSPECTORS

- (a) A GH inspector is considered to remain qualified if they have performed a minimum of two on-site GH audits/inspections or if they have assisted other competent authorities in performing a minimum of two GH audits/inspections in 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 may be requalified by completing the minimum number of audits/inspections under the supervision of a qualified inspector. The missed audits/inspections should take place within three months of the deadline for fulfilling the conditions in point (a).
- (c) If a GH inspector loses their qualification because they have not performed any audits/inspections for a period between 12 and 24 months, they may be requalified by the competent authority only after successfully completing on-the-job training and any recurrent training required.
- (d) If more than 24 months passed since a GH inspector's last audit/inspection, they may be requalified by the competent authority only after successfully completing initial training, including on-the-job training.

GM1 ARGH.MGM.200(b) Management system

PRACTICAL TRAINING VERSUS ON-THE-JOB TRAINING

Practical training, as part of the initial training that inspectors receive, refers to various methods used during training to encourage the trainee to apply their knowledge and skills and help them develop the appropriate attitudes. It involves exercises that simulate the real-life working environment.

On-the-job training requires the participation of the trainee inspector in real audits/inspections, either as an observer or as a GH inspector under supervision.

GM2 ARGH.MGM.200(b) Management system

DOCUMENTS RELEVANT TO THE TRAINING FOR GH INSPECTORS

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

- (a) ICAO documentation:
 - (1) Annex 6 – Operation of Aircraft – relevant standards and recommended practices for GH,
 - (2) Annex 9 – Facilitation,
 - (3) Annex 14 – Aerodromes – relevant standards and recommended practices for GH,
 - (4) Annex 18 – The Safe Transport of Dangerous Goods by Air,
 - (5) Annex 19 – Safety Management,
 - (6) Doc 10121 – Manual on Ground Handling,
 - (7) Doc 9284 – Technical Instructions for the Safe Transport of Dangerous Goods,
 - (8) Doc 9640 – Manual of Aircraft Ground De-icing/Anti-icing Operations,
 - (9) Doc 9977 – Manual on Civil Aviation Jet Fuel Supply,
 - (10) Doc 10070 – Manual on the Competencies of Civil Aviation Safety Inspectors,
 - (11) Doc 10102 – Guidance for Safe Operations Involving Aeroplane Cargo Compartments,
 - (12) Doc 10147 – Guidance on a Competency-based Approach to Dangerous Goods Training and Assessment,
 - (13) Doc 10151 – Manual on Human Performance (HP) for Regulators;
- (b) industry standards and best practices, as applicable:
 - (1) Joint Inspection Group (JIG) standards related to fuelling operations,
 - (2) Society of Automotive Engineers (SAE) standards related to de-icing and anti-icing operations,
 - (3) IATA Ground Operations Manual (IGOM), IATA Airport Handling Manual (AHM), and IATA Cargo Handling Manual (ICHM), Live Animals Regulations (LAR),
 - (4) EN standards for GSE (EN 12312-1 to 12312-20 and EN 1915-1 to 1915-4),
 - (5) International Business Aviation Council (IBAC) International Standard for Business Aircraft Handlers regarding GH for business aviation operations (IS-BAH).

GM3 ARGH.MGM.200(b) Management system

QUALIFICATION OF INSPECTORS

- (a) The term ‘qualification’ denotes adequacy for a purpose. Inspectors may become qualified by fulfilling the necessary conditions, such as completing the required training, holding a diploma or degree, or gaining suitable experience. Qualification also includes the ability, capacity, knowledge and skills that are required to perform a task or that make a person eligible for a duty, an office, a position, a privilege or a 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, environmental science, etc.). In such cases, the person occupying the post is expected to possess the necessary qualifications at a level that is in accordance with the applicable national or EU legislation.

GM4 ARGH.MGM.200(b) Management system

RECURRENT ASSESSMENT OF AN INSPECTOR’S COMPETENCE

A recurrent assessment is the equivalent of a proficiency check.

It is recommended that the competent authority include recurrent assessment in the training process to ensure the maintenance of an inspector’s competence.

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

AMC1 ARGH.MGM.215(a) Record-keeping

GENERAL

- (a) The record-keeping system should ensure that all records are accessible whenever needed within a reasonable time. These records should be organised in a way that ensures traceability and retrievability throughout the required retention period.
- (b) Records should be kept in paper form or in electronic format, or in a combination of both. Records stored on microfilm or an optical disc are also acceptable. The records should remain legible and accessible throughout the required retention period. The retention period runs from when the record was created or when it was most recently 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 the unauthorised alteration of data.
- (d) All computer hardware used to store backup data should be kept in a different location from that containing the working data and in an environment that ensures that the data remains in good condition. When hardware or software changes take place, special care should be taken to ensure that all necessary data continues to be accessible, at least throughout the period specified in point ARGH.MGM.215.

AMC1 ARGH.MGM.215(a)(1);(2);(3) Record-keeping

RECORDS RELATED TO THE COMPETENT AUTHORITY'S MANAGEMENT SYSTEM

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

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

AMC1 ARGH.MGM.215(a)(4) Record-keeping

RECORDS RELATED TO GH 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 have been carried out;
- (c) continuing oversight records, including records from all audits and inspections;
- (d) copies of all relevant correspondence;
- (e) details of any exemptions.

SUBPART OVS — OVERSIGHT AND ENFORCEMENT

GM1 ARGH.OVS.300 Oversight

GENERAL

- (a) The responsibility for the safe conduct of GH services lies with the GH organisation. A declaration policy recognises that the GH organisation is the primary holder of responsibility for monitoring the safety of its operation. The objective of ensuring safety of operations cannot be attained unless the organisation is prepared to accept the implications of this policy, including those of committing the necessary resources to its implementation. The content of Part-ORGH (Annex I to Commission Delegated Regulation (EU) 2025/20) 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 suitability and effectiveness of the organisation's management system, on a continuing basis.
- (c) The accountable manager of a GH organisation is accountable to the competent authority and to those who appoint him or her. Therefore, the competent authority cannot accept a situation in which the accountable manager is denied sufficient funds, human resources or influence to rectify deficiencies identified in the management system.
- (d) Oversight of the organisation includes the 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 risks and apply effective mitigation measures. The process and capabilities should be identifiable 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 for its activities;
 - (2) assess the safety risks related to the hazards identified;
 - (3) be clear on where those hazards may exceed acceptable safety risk limits;
 - (4) identify and implement mitigation measures to minimise or remove the safety risks, which could be reflected, for example, in the following:

- (i) applying effective operational procedures for the provision of the GH services subject to the hazards identified;
- (ii) assessing the competence and continued competence of its personnel to perform their duties and implementing any necessary training, conducting adequate recurrent assessment and retraining of GH personnel and ensuring the availability of sufficient personnel for GH duties;
- (iii) equipping the GSE with proximity sensors or applying equivalent controls through procedures to prevent aircraft damage.

GM1 ARGH.OVS.300(a);(b);(c) Oversight

METHODOLOGY

The methodology established by the competent authority for evaluating the safety risk management of an organisation is a set of processes, procedures, guidelines and tools applied consistently by a competent authority to discharge its oversight responsibilities in the aviation domains within the scope of Regulation (EU) 2018/1139. It should be understood that regardless of the methodology applied by one competent authority, the outcome of the evaluation process is expected to be the same for all competent authorities and measured against the applicable requirements.

AMC1 ARGH.OVS.300(d) Oversight

INDUSTRY AUDITS

- (a) As part of data and information collected to support the competent authority's oversight and to develop the basis for risk-based oversight, the authority may take into account the results of industry audits on the GH organisation conducted by third-party auditors.
- (b) The competent authority may credit such industry audits if they meet the following criteria:
 - (1) the scope of the industry audits can easily be mapped against Annex I (Part-ORGH) and Annex II (Part-GH.OPS) to Commission Delegated Regulation (EU) 2025/20, as applicable;
 - (2) the audit content is fit for purpose, is objective, the audit process is systematic and the auditors have no conflict of interest with the audited organisation and are properly trained;
 - (3) audit results are accessible to the competent authority, and the relevant safety information from those results can be shared with the competent authorities responsible for the oversight of the GH 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 do not replace the oversight activities of the competent authority. The competent authority remains responsible for oversight at all times.

- (d) Conformity of a GH organisation with industry standards or good practices proven through a third-party industry audit does not result in automatic recognition of compliance with Commission Delegated Regulation (EU) 2025/20.

GM1 ARGH.OVS.300(d) Oversight

INDUSTRY AUDITS IN THE SCOPE OF OVERSIGHT

Various organisations may perform an audit on a GH organisation to verify how it implements different procedures as part of its contractual obligations. The competent authority could decide to use, as relevant, the results from those audits for the purpose of oversight or to better define a GH organisation's safety profile as a basis for risk-based oversight, alongside 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 or programmes applicable to it under Regulation (EU) No 139/2014, such as, for example, the foreign object debris (FOD) programme, operation in adverse weather conditions, pedestrian access or driving in 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) No 965/2012 and Annex VII to Regulation (EU) 2018/1139;
- (c) a third-party industry auditing organisation performing the audit on behalf of an aircraft operator or an aerodrome operator.

AMC1 ARGH.OVS.305 Oversight programme

PROCEDURES FOR OVERSIGHT OF GH ORGANISATIONS

- (a) The competent authority should appoint an inspector for each GH organisation with overall responsibility for supervising, and liaising 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, of a scale and frequency commensurate with the organisation's operations, should include, but not be limited to:
 - (1) the organisation's management system;
 - (2) safety management, safety risk identification and mitigation actions;
 - (3) reporting records;
 - (4) manuals and procedures;
 - (5) training programmes and records and written examples of training management;
 - (6) performance of GH activities during the aircraft turnaround process;
 - (7) GSE, including records of its maintenance;

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

AMC1 ARGH.OVS.305(a) Oversight programme

AUDITING

- (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 designated personnel, to determine whether the organisation identifies and corrects its problems.
- (c) On concluding the audit, the auditing inspector should complete an audit report, including all findings.

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

REGULAR REVIEW OF THE OVERSIGHT PROGRAMME

- (a) To ensure that its oversight programme is adequately maintained, as required by point 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 following 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 point ORGH.GEN.160 of Delegated Regulation (EU) 2025/20 and points ARGH.OVS.300(c) and (d).

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

OVERSIGHT PROGRAMME AND PLANNING

- (a) When defining the oversight programme and planning 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 exposure of a GH organisation to risk and its safety performance:
 - (1) information from the GH organisation's annual monitoring of safety performance, as referred to in AMC1 ORGH.MGM.200(b)(2)(iii);
 - (2) information from the safety reports related to the organisation's GH activities;
 - (3) types of GH services provided at each aerodrome and the specific operational context at the aerodromes;
 - (4) specific procedures implemented by the organisation stemming from flexibility provisions in Article 71 of Regulation (EU) 2018/1139 or AltMoC;
 - (5) number of contracted services in the scope of GH service provision;
 - (6) the effectiveness of the organisation's management system in addressing non-compliance;

- (7) any other safety-relevant data resulting from audits and inspections, including industry audits;
 - (8) the implementation by the GH organisation of industry standards and good practices, based on the results of the evaluation referred to in point ARGH.OVS.310.
- (b) The oversight programme should follow a risk-based approach, considering the data collected under point (a), and should be developed on a yearly basis.
 - (c) The competent authority should include all GH organisations in the programme no later than 12 months after the date it receives the first declaration.
 - (d) When deciding on the number of stations included in the oversight programme to complete the scope of oversight, the competent authority should consider the elements of point ARGH.OVS.305(b) applicable to the station, as well as the result of the oversight of the GH organisation's management system.
 - (e) Additional audits and inspections of specific GH organisations may be included in the oversight programme based on assessments of associated risks carried out within occurrence reporting schemes.
 - (f) The sections of the oversight programme dealing with inspections of GH activities performed during turnaround should be developed based on geographical location, considering aerodrome activity and focusing on key issues that can be inspected in the time available without unnecessarily delaying operations.
 - (g) The competent authority should include, as part of its oversight, meetings between the accountable manager and the competent authority to ensure that both remain informed of significant issues, at a frequency agreed between the competent authority and the GH organisation.

GM1 ARGH.OVS.305(b)(5) Oversight programme

STATION OVERSIGHT

- (a) A low safety performance demonstrated at the level of the 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 the 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(d) Oversight programme

OVERSIGHT PLANNING CYCLE

- (a) The competent authority should schedule audits and inspections appropriate to each GH organisation. The planning of audits and inspections should consider the effectiveness of the

organisation's capability to identify hazards and manage the safety risks within its organisation and operation. Inspectors should work in accordance with the schedule provided to the GH organisation.

- (b) When the competent authority varies the frequency of audits or inspections as a result of its assessment of the GH organisation's safety performance, it should ensure that all aspects of the GH organisation's 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.

AMC2 ARGH.OVS.305(d) Oversight programme

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

- (a) When planning station oversight to complete the oversight programme for the purpose of conducting 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) The agreed overall number of stations should be relevant to the safety performance of the GH organisation.
- (c) The following criteria should be considered as a minimum for the selection of stations to be audited or inspected:
 - (1) an even spread of stations across the Member States where the GH organisation provides services;
 - (2) the volume of activity at each of those stations; and
 - (3) the main risk areas identified.
- (d) The GH organisation subject to the oversight should be informed about the planning of that oversight.

GM1 ARGH.OVS.305(e) Oversight programme

ENHANCED OVERSIGHT DUE TO LOCAL CONDITIONS AT THE AERODROME OF OPERATION

Specific hazards posed by the local conditions at the aerodrome of operation that may require enhanced oversight include but are not limited to:

- (a) operations requiring de-icing/anti-icing during cold seasons;

- (b) congested traffic in the movement area that leads to frequent GH events;
- (c) aerodromes working on a seasonal basis (usually during summer), resulting in disruptions of scheduled operations and the use of temporary workers during the peak season.

AMC1 ARGH.OVS.310 Industry standards

EVALUATION OF A RECOGNISED INDUSTRY STANDARD

- (a) A recognised industry standard is a standard that has been approved by a standardisation body such as the European Committee for Standardization (CEN), European Committee for Electrotechnical Standardization (CENELEC), or the International Organization for Standardization (ISO), or mandated by legal requirements.
- (b) The process of evaluating recognised industry standards that have been certified by an appropriately accredited organisation may be reduced to confirming that they address the scope of Annex I or Annex II to Commission Delegated Regulation (EU) 2025/20, as applicable.

AMC2 ARGH.OVS.310 Industry standards

OBJECTIVE CRITERIA FOR INDUSTRY STANDARDS

- (a) Industry standards subject to the evaluation referred to in point ARGH.OVS.310 should meet the following criteria as a minimum:
 - (1) they are developed, maintained and endorsed with the participation of experts from relevant industry stakeholders;
 - (2) they address the scope of Annex I and/or II to Commission Delegated Regulation (EU) 2025/20, as applicable, with sufficient details to enable implementation of the related implementing rules;
 - (3) they are based on experience in the field and have proven themselves through testing;
 - (4) they are supported by scientific and/or technical data and documentation, safety tests and safety impact assessments, as applicable;
 - (5) they include technical, operational and, if applicable, human factors specifications for their safe implementation;
 - (6) they clearly identify the responsibilities of the persons involved in their application;
 - (7) they contain procedures for continuing review and improvement, to include lessons learned from daily operations and consider relevant innovations in the field.

RELEVANT INDUSTRY STAKEHOLDERS

- (b) The industry stakeholders represented in the development, maintenance and endorsement of an industry standard should include but not be limited to aircraft operators, GH organisations, aerodrome operators, product manufacturers, GSE manufacturers, aircraft manufacturers, and regional and global industry associations thereof, as applicable. The aim of their inclusion is to

ensure that all stakeholders involved in the development and maintenance of industry standards are also involved in their endorsement.

AMC3 ARGH.OVS.310 Industry standards

OVERSIGHT OF ORGANISATIONS THAT USE INDUSTRY STANDARDS AND GOOD PRACTICES

- (a) For the oversight of a GH organisation that applies industry standards and good practices, the competent authority should verify that the actual implementation of the standards and good practices in the GH organisation's daily operation complies with Commission Delegated Regulation (EU) 2025/20.
- (b) When a GH organisation declares that it applies industry standards and good practices to comply with Commission Delegated Regulation (EU) 2025/20, the competent authority should use this as complementary information to support its risk-based oversight. The implementation of industry standards and good practices by an organisation should not be assessed in isolation from the other elements to be considered by the competent authority for its oversight.
- (c) The competent authority may decide to what extent it intends to use the results of auditing programmes that verify a GH organisation's conformity with the industry standards and good practices.

GM1 ARGH.OVS.310 Industry standards

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

- (a) It is expected that industry standards related to products such as the following are supported by scientific documentation and safety-relevant tests:
 - (1) GSE,
 - (2) de-icing/anti-icing fluids,
 - (3) fuel.
- (b) It is expected that good practices in the aviation industry covering GH processes and operations, the use of products and organisational aspects are based on years of experience in the field, with trial and error proving that certain practices are better than others. It can be difficult to prove that 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 tests 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:

³ The criteria have been published by the Commission (see European Commission, 'What are "good practices"?', European Commission website, 13 October 2021, accessed 7 April 2025, https://migrant-integration.ec.europa.eu/page/what-are-good-practices_en) for a different purpose, but they can be extrapolated to this domain.

- (i) have a clear description of the context;
 - (ii) have a clear description of the objectives and purposes;
 - (iii) have a clear description of the actions/activities involved;
 - (iv) are at least one year old;
- (2) selection criteria:
- (i) are relevant to the needs identified;
 - (ii) provide sufficient indication of transferability, for example:
 - (A) continuing after the initial phase;
 - (B) attracting structural funding or support from new sponsors or leading to the generation of resources;
 - (C) showing potential for replication in different contexts and application to different target groups.
- (d) It is recommended that human factors be reflected in industry standards and good practices when applicable.

AMC1 ARGH.OVS.315(a) Oversight tasks

MANAGEMENT SYSTEM ASSESSMENT

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

GM1 ARGH.OVS.315(a) Oversight tasks

ASSESSING THE MATURITY OF THE MANAGEMENT SYSTEM OF A GH ORGANISATION

[EASA's Management System Assessment Tool](#) may be used by both competent authorities and GH organisations to monitor and evaluate the level of maturity of a GH organisation. The maturity level of a GH organisation is expected to increase gradually.

AMC1 ARGH.OVS.320(a) Declaration of ground handling organisations

ACKNOWLEDGEMENT OF RECEIPT

Unless otherwise provided for by the electronic system used to register declarations, the competent authority should acknowledge receipt of the declaration – for example, in writing, preferably by email – within 10 to 15 working days.

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

VERIFICATION OF DECLARATIONS

The verification of a declaration received from a GH organisation does not involve the verification of the GH organisation's documents associated with that declaration. The aim is to check whether the declaration has been correctly filled in and signed, that there is no missing information, etc.

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

MANAGEMENT OF FINDINGS

- (a) To ensure that the identified areas of non-compliance 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 recurrence;
 - (3) assess the implementation of the accepted corrective actions;
 - (4) be satisfied that the accepted corrective actions have been adequately implemented;
 - (5) conclude the findings only after the actions in points (1) to (4) have been completed; and
 - (6) record all findings and observations.
- (b) In the case of level 2 findings, the competent authority should first grant the GH organisation a period to submit a corrective action plan including the root cause(s). This period should be shorter than the corrective action implementation period, to provide sufficient time for the authority to agree on an acceptable corrective action plan and for the GH organisation to implement it before the end of the implementation period.
- (c) The competent authority should monitor all due dates agreed in accordance with points (a) and (b).

GM1 ARGH.OVS.330(a) Cooperative oversight

MORE THAN ONE COMPETENT AUTHORITY RESPONSIBLE FOR GH OVERSIGHT IN THE SAME MEMBER STATE

Where an organisation referred to in point ARGH.OVS.330(b) provides GH services at aerodromes that are under the oversight of more than one competent authority within the same Member State, it is recommended that that Member State designate the competent authority of the Member State where the organisation has its PPOB for the purpose of establishing clear responsibilities as referred to in point ARGH.OVS.330(d).

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

SHARING INFORMATION RELATED TO ALTERNATIVE MEANS OF COMPLIANCE

- (a) If an AltMoC submitted by a GH organisation that is part of a single GH business grouping or a single air carrier business grouping for self-handling is applicable only to certain aerodromes, the competent authority receiving the AltMoC should ensure that all the competent authorities concerned have access to it.
- (b) The competent authorities of the aerodromes where that AltMoC applies should cooperate to ensure that the content of the AltMoC is accepted and assessed consistently at all the aerodromes where it applies.

GM1 ARGH.OVS.330(g);(j) Cooperative oversight

SYSTEMIC AND OPERATIONAL NON-COMPLIANCE

- (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) the SMS,
 - (2) the compliance monitoring process,
 - (3) the documentation system,
 - (4) the training programme,
 - (5) the GSE operation and maintenance programme,
 - (6) the general approach to operational procedures.
- (b) A systemic non-compliance does not refer to:
 - (1) operational procedures specific to an aerodrome as required by the aerodrome operator;
 - (2) safety 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 way in which the management system or operational requirements are implemented at that aerodrome. This type of non-compliance is, by default, non-systemic — that is, it does not

occur at other stations where that GH organisation provides services. An operational non-compliance does not require action on the part of another competent authority in another Member State.

GM2 ARGH.OVS.330(g);(j) Cooperative oversight

COOPERATIVE OVERSIGHT RESPONSIBILITIES IN THE CASE OF SYSTEMIC NON-COMPLIANCE (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 the 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.
- (b) When the competent authority of the Member State in which the organisation has its PPOB raises a finding on a management system component, it can already be considered potential systemic non-compliance. The other competent authorities concerned will use this information when preparing their own audits/inspections of stations in their Member State. Each competent authority is responsible for verifying 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 that of the Member State in which the organisation has its 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. As in the situation described in 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 for verifying that the systemic non-compliance has been addressed at the individual stations in its Member State.
- (d) The information related to systemic non-compliance can be useful for assessing the safety performance of the organisation as a whole.

GM3 ARGH.OVS.330(g);(j) Cooperative oversight

COOPERATIVE OVERSIGHT ACTIONS

The competent authorities concerned could consider any of the examples provided below to ensure continuing communication and consultation among themselves to establish efficient cooperative oversight.

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

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