

eRules

GROUND HANDLING

(IR/DR + AMC & GM)



Easy Access Rules for Ground Handling (Regulations (EU) 2025/23 and 2025/20)

EASA eRULES

EASA eRules: aviation rules for the 21st century

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EASA eRules is a comprehensive, single system for structuring, sharing, and storing of rules. It is the single, easy-access online database for all aviation safety rules applicable to persons and organisations subject to Basic Regulation (Regulation (EU) 2018/1139).

The Easy Access Rules (EAR) are the output of the eRules project. The EAR books are consolidated versions of those rules, combining EU regulations with the related EASA Executive Director (ED) decisions in an easy-to-read format with advanced navigation features through links and bookmarks. The EAR books are regularly updated, following the adoption of an official publication.

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The EASA eRules system is developed and implemented in close cooperation with the Member States and aviation industry to ensure that all its capabilities are relevant and effective.

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DISCLAIMER

This document is issued by the European Union Aviation Safety Agency (referred to as both 'EASA' and 'the Agency') to provide its stakeholders with an updated, consolidated, and easy-to-read publication. It has been prepared by putting together the officially published EU regulations with the related EASA acceptable means of compliance (AMC) and guidance material (GM) (including their amendments) adopted so far. However, this document is not an official publication, and EASA accepts no liability for damage of any kind resulting from the risks inherent in its use.

LIST OF REVISIONS

Published	Reason for revision
November 2025	First Easy Access Rules for Ground Handling document, powered by eRules, incorporating the following regulatory material: — Commission Implementing Regulation (EU) 2025/23; — Commission Delegated Regulation (EU) 2025/20; — ED Decision 2025/006/R; — ED Decision 2025/007/R; and — Corrigenda to ED Decision 2025/007/R (Corrigendum I of 21 July 2025 and Corrigendum II of 24 September 2025).

NOTE FROM THE EDITOR

The content of this document is arranged as follows: the cover regulation (recitals and articles) of the implementing rule (IR) appears first, then the IR annex points, followed by the cover regulation of the delegated rule (DR) and DR annex points. The IR and DR and the annexes thereto are consolidated with the related acceptable means of compliance (AMC) and guidance material (GM).

All elements (i.e. articles, IRs, DRs, AMC, and GM) are colour-coded and can be identified according to the illustration below. The EU regulation or EASA Executive Director (ED) decision through which the recitals, article, IR, DR, AMC, or GM was introduced or last amended is indicated below the recitals, article, IR, DR, AMC, or GM title in *italics*.

<u>Cover regulation article</u>	<i>EU regulation</i>
Implementing rule or annex thereto; delegated rule or annex thereto	<i>EU regulation</i>
Acceptable means of compliance	<i>ED decision</i>
Guidance material	<i>ED decision</i>

Note:

All rules in this publication have a **general future applicability date**, i.e. **27 March 2028**.

Certain rules that have a **deferred future applicability date**, i.e. **27 March 2031**, are marked with purple and their applicability date is indicated below the rule text in purple, in square brackets '[]', and in *italics*.

This document will be updated regularly to incorporate further amendments.

The format of this document has been adjusted to make it user-friendly and for reference purposes. Any comments should be sent to erules@easa.europa.eu.

INCORPORATED AMENDMENTS

COMMISSION REGULATIONS

Incorporated Commission Regulation	Affected Part	Applicability date ¹
Commission Implementing Regulation (EU) 2025/23	Cover regulation	27 March 2028
	Annex (Part-ARGH)	However, (a) point ARGH.GEN.125(c); (b) point ARGH.GEN.136; (c) point ARGH.MGM.200(e); (d) point ARGH.MGM.205(e); (e) point ARGH.MGM.211; and (f) point ARGH.OVS.300(f) are applicable from 27 March 2031.
Commission Delegated Regulation (EU) 2025/20	Cover regulation	27 March 2028
	Annex I (Part-ORGH)	However,
	Annex II (Part-GH.OPS)	point ORGH.MGM.201 of (Part-ORGH) is applicable from 27 March 2031.

¹ This is the earliest date of application (i.e. the date from which an act or a provision in an act produces its full legal effects) as defined in the relevant cover regulation article. Some provisions of the regulations though may be applicable at a later date (deferred applicability). Besides, there may be some opt-outs (derogations from certain provisions) notified by the Member States.

AMC/GM TO IRs (ED DECISIONS)

Incorporated ED Decision	AMC/GM Issue No, Amendment No	Applicability date ¹
ED Decision 2025/006/R	AMC and GM to the Annex (Part-ARGH) to Commission Implementing Regulation (EU) 2025/23 — Initial issue	27 March 2028
ED Decision 2025/007/R and Corrigenda to ED Decision 2025/007/R (Corrigendum I of 21 July 2025 and Corrigendum II of 24 September 2025)	AMC and GM to the Articles of Commission Implementing Regulation (EU) 2025/20 — Initial issue	27 March 2028
	AMC and GM to Annex I (Part-ORGH) to Commission Implementing Regulation (EU) 2025/20 — Initial issue	
	AMC and GM to Annex II (Part-GH.OPS) to Commission Implementing Regulation (EU) 2025/20 — Initial issue	

Note: To access the official versions, please click on the hyperlinks provided above.

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COMMISSION IMPLEMENTING REGULATION (EU) 2025/23

COVER REGULATION

COMMISSION IMPLEMENTING REGULATION (EU) 2025/23

of 19 December 2024

laying down rules for the application of Regulation (EU) 2018/1139 of the European Parliament and of the Council, as regards requirements for the oversight of ground handling services and organisations providing them

Powers and recitals

Regulation (EU) 2025/23

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to [Regulation \(EU\) 2018/1139](#) of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91¹, and in particular Article 62(14) point (d), Article 62(15) points (a), (b) and (c), and Article 72(5) thereof,

Whereas:

- (1) Regulation (EU) 2018/1139 establishes the essential requirements for the safe provision of ground handling services and organisations providing them at aerodromes within the scope of that Regulation, as well as provisions for oversight by national competent authorities of those organisations and the ground handling services provided at the Union aerodromes within the scope of that Regulation.
- (2) To ensure a high level of civil aviation safety in the Union, and in line with the principle of subsidiarity, this Regulation should reflect the state of the art and best practices in the field of ground handling. It should also take into account the applicable International Civil Aviation Organization Standards and Recommended Practices and worldwide ground handling operation experience, as well as scientific and technical progress in the ground handling domain. Furthermore, in order to ensure an adequate amount of oversight of organisations providing ground handling services, the rules laid down in this Regulations should be proportionate, adjusted to the safety risk of ground handling activities and safety performance of the ground handling organisations and should provide for the necessary flexibility for customised compliance.
- (3) The requirements laid down in this Regulation should ensure that Member States conduct a harmonised and consistent oversight of organisations providing ground handling services at Union aerodromes. Therefore, this Regulation should provide the framework for the development and implementation by competent authorities of a management system to

¹ [OJ L 212, 22.8.2018, p. 1](#), ELI: <http://data.europa.eu/eli/reg/2018/1139/oj>.

encompass the necessary processes, training and qualification of personnel, and procedures for oversight and particularly cooperative oversight of ground handling organisations.

- (4) To ensure that the oversight of declaring ground handling organisations is performed in a competent and correct manner and that the results of oversight are properly utilised to improve the safety of the overseen organisations, national competent authorities should ensure that the inspectors conducting oversight are adequately trained and qualified, and have appropriate skills and experience to assess the safety performance of the ground handling organisations under their oversight responsibilities.
- (5) To enable efficient use of resources of competent authorities when performing oversight and encourage the harmonisation of ground handling operational processes and procedures by the voluntary use of industry standards, this Regulation should enable Member States to assess together the compliance of the industry standards with [Annexes I and II](#) to [Commission Delegated Regulation \(EU\) 2025/20](#)¹.
- (6) The oversight activities covering the verification of compliance of ground handling organisations with all the applicable requirements and in accordance with the declaration submitted should be applied in a consistent manner and spanning over the period established in this Regulation. To achieve this, competent authorities should develop and implement an oversight programme to ensure the scope of the oversight is fully covered as planned.
- (7) To ensure the implementation of a risk-based oversight, the oversight programme should be partly based on safety data collected from ground handling organisations, which would support competent authorities in having a complete picture of the level of safety for each ground handling organisation subject to oversight. The safety reports should ensure reliable and sufficient information to enable accurate safety analysis.
- (8) To ensure that the reporting obligations of ground handling organisations contribute to the improvement of safety in ground handling operations, this Regulation should establish a framework for competent authorities to provide direct and consistent feedback on the reported ground handling events directly to the ground handling organisations and this should be enabled, among others, through the oversight process.
- (9) Regulatory measures should prioritise cooperation between national competent authorities in overseeing organisations providing ground handling services at aerodromes located in more than one Member State, to improve resource utilisation and avoid duplication of work and oversight. The national competent authorities involved in the oversight of organisations providing ground handling services at aerodromes located in more than one Member State should share the information necessary for an efficient and harmonised oversight. Good coordination of the entire process and sharing of oversight tasks between the Member States concerned are crucial in ensuring an efficient cooperative oversight. In this sense, national competent authorities involved in the cooperative oversight process should rely on clear rules defining their tasks and have the right tools so that they can share among themselves the results of the oversight activities performed at the aerodromes under their oversight and at the ground handling organisation's principal place of business, from where it exercises control and applies the management system across all its stations.

¹ Commission Delegated Regulation (EU) 2025/20 of 19 December 2024 supplementing Regulation (EU) 2018/1139 of the European Parliament and of the Council by laying down requirements for the safe provision of ground handling services and for organisations providing them (OJ L, 2025/20, 7.3.2025, ELI: http://data.europa.eu/eli/reg_del/2025/20/oj).

- (10) The measures provided for in this Regulation are based on Opinion No 01/2024¹ issued by the European Union Aviation Safety Agency ('the Agency') in accordance with Article 75(2), points (b) and (c), and Article 76(1) of Regulation (EU) 2018/1139.
- (11) It is necessary to provide sufficient time for the competent authorities to implement the new regulatory framework after the entry into force of this Regulation. Therefore, the application of this Regulation should be deferred to 27 March 2028.
- (12) The requirements laid down in this Regulation are in accordance with the opinion of the Committee for the application of common safety rules in the field of civil aviation established by Article 127 of Regulation (EU) 2018/1139,

HAS ADOPTED THIS REGULATION:

Article 1 — Subject matter

Regulation (EU) 2025/23

This Regulation lays down detailed rules on the allocation of responsibilities of national competent authorities responsible for the oversight of ground handling services and organisations providing such services, rules on exchange of information, qualification of personnel and administration and management systems of those competent authorities.

Article 2 — Definitions

Regulation (EU) 2025/23

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

- (1) 'cooperative oversight' means a coordinated oversight process that involves more than one competent authority to oversee an organisation providing ground handling services at aerodromes that are under the jurisdiction of more than one competent authority or in more than one Member State; whereas the competent authorities determine their individual tasks, share relevant data and information for the oversight, promote cooperation to ensure a uniform oversight and efficient use of resources by, inter alia, avoiding duplications of tasks, audits and inspections;
- (2) '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; whereas audits may include inspections;
- (3) '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; whereas an inspection may be part of an audit, but may also be conducted outside the normal audit plan, in particular, to verify the closure of a certain finding.

Article 3 — Main obligations of the Member States

Regulation (EU) 2025/23

1. Each Member State shall designate one or more competent authorities within that Member State, with the necessary powers and responsibilities for the oversight and enforcement tasks regarding ground handling organisations operating at the aerodromes within the scope of [Regulation \(EU\) 2018/1139](#).

¹ <https://www.easa.europa.eu/en/document-library/opinions/opinion-no-012024>.

2. The national competent authorities shall have the following obligations, which are detailed further in the [Annex](#) to this Regulation:
 - (a) to receive declarations from organisations that perform ground handling services at the aerodromes that are under their jurisdiction;
 - (b) to conduct oversight of those ground handling organisations;
 - (c) to ensure the personnel assigned to perform ground handling oversight are appropriately trained, qualified and competent and their competence is maintained;
 - (d) to contribute to the implementation of an effective cooperative oversight;
 - (e) to take or initiate enforcement measures as appropriate.
3. Member States shall ensure that the competent authorities have the necessary capabilities and resources to fulfil their responsibilities under this Regulation.
4. Member States shall ensure that competent authorities exercise their powers impartially and transparently.

Article 4 — Oversight

Regulation (EU) 2025/23

1. Where a Member State designates more than one competent authority, it shall set out the responsibilities and geographic scope of competence of each competent authority.

Coordination shall be established between those authorities to ensure effective oversight of all ground handling activities and organisations performing them within their respective remits.
2. Member States shall ensure that the competent authorities' personnel do not perform oversight activities where this could result directly or indirectly in a conflict of interest.
3. Personnel authorised by the competent authority to carry out oversight activities shall be empowered to perform 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;
 - (c) ask for an oral explanation on-site when necessary;
 - (d) enter relevant premises, operating sites or other relevant areas and means of transport;
 - (e) perform audits, investigations, tests, exercises, assessments, inspections; and
 - (f) take or initiate enforcement measures as appropriate.

Where necessary, Member States shall empower the personnel to carry out additional tasks for the purpose of oversight activities.
4. Where a ground handling organisation falls within the scope of Article 2(1), point (c), of [Commission Delegated Regulation \(EU\) 2022/1645](#)¹, and the Member State concerned has designated an independent and autonomous entity to fulfil the assigned role and

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 ([OJ L 248, 26.9.2022, p. 18](#), ELI: http://data.europa.eu/eli/reg_del/2022/1645/oj).

responsibilities of the competent authority responsible for overseeing compliance with Delegated Regulation (EU) 2022/1645, coordination measures shall be established between that entity and the national competent authority designated in accordance with this Regulation, to ensure effective oversight of all the requirements to be met by the ground handling organisation.

5. The Member States shall develop and implement enforcement measures as specified in Article 62(2) points (d) and (e), of [Regulation \(EU\) 2018/1139](#).

Article 5 — Agency support to facilitate cooperative oversight

Regulation (EU) 2025/23

The Agency shall facilitate the effective implementation of the cooperative oversight requirements by the Member States, to enable secure access and exchange of relevant information and documentation among competent authorities, necessary to exercise their tasks related to oversight and enforcement pursuant to this Regulation.

Article 6 — Transitional provisions

Regulation (EU) 2025/23

By way of derogation from point [ARGH.OVS.305](#)(c), competent authorities shall perform at least one comprehensive oversight of all declaring organisations in their Member State by 27 March 2028 + 5 years = 27 March 2033 at the latest.

The competent authority shall take into account the prior operational experience of an organisation when developing its oversight plan.

Article 7 — Entry into force and application

Regulation (EU) 2025/23

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 27 March 2028.
3. The following points shall apply from 27 March 2031:
 - (a) point [ARGH.GEN.125](#)(c);
 - (b) point [ARGH.GEN.136](#);
 - (c) point [ARGH.MGM.200](#)(e);
 - (d) point [ARGH.MGM.205](#)(e);
 - (e) point [ARGH.MGM.211](#);
 - (f) point [ARGH.OVS.300](#)(f).

Signature

Regulation (EU) 2025/23

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

Done at Brussels, 19 December 2024.

For the Commission
The President
Ursula VON DER LEYEN

ANNEX — PART-ARGH

AUTHORITY REQUIREMENTS — GROUND HANDLING

SUBPART GEN — GENERAL REQUIREMENTS

ARGH.GEN.005 Scope

Regulation (EU) 2025/23

This Annex establishes requirements for the competent authorities and for their responsibilities referred to in [Articles 3\(1\) and 4](#) of this Regulation to conduct oversight of the ground handling organisations and the ground handling services that they provide in accordance with [Delegated Regulation \(EU\) 2025/20](#).

ARGH.GEN.100 Competent authority

Regulation (EU) 2025/23

- (a) The competent authority responsible for the oversight of organisations providing ground handling services at an aerodrome within the scope of [Regulation \(EU\) 2018/1139](#) shall be the authority designated by the Member State where the aerodrome is located.
- (b) Without affecting 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 have been submitted to all competent authorities concerned if both the following conditions are met:

- (1) it includes information on the ground handling services provided at all the aerodromes within the scope of Regulation (EU) 2018/1139 in all the Member States where the ground handling organisation provides services;
 - (2) it reaches out to all the Member States concerned through the repository of information established in accordance with Article 74 of Regulation (EU) 2018/1139.
- (c) Once submitted, the declaration is valid and recognised in all Member States without further requirements or evaluation, in accordance with Article 67(1) of Regulation (EU) 2018/1139.
 - (d) The competent authority responsible for the oversight of organisations referred to in point (b) shall be the authority designated by the Member State where the aerodrome is located. The sharing of tasks among the competent authorities concerned for the oversight of those organisations shall be done in accordance with point [ARGH.OVS.330](#).

AMC1 ARGH.GEN.100 Competent authority

ED Decision 2025/006/R

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.

ARGH.GEN.115 Oversight documentation

Regulation (EU) 2025/23

The competent authority shall provide the relevant legal acts, standards, rules, technical publications and related documents, as well as guidance material to its personnel in order to allow them to perform their tasks and to discharge their responsibilities.

GM1 ARGH.GEN.115 Oversight documentation

ED Decision 2025/006/R

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.

ARGH.GEN.120 Means of compliance

Regulation (EU) 2025/23

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.

AMC1 ARGH.GEN.120 Means of compliance

ED Decision 2025/006/R

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.

ARGH.GEN.125 Information to be provided to the Agency

Regulation (EU) 2025/23

- (a) Where the competent authority has become aware of any significant problems with the implementation, by a ground handling organisation, of [Regulation \(EU\) 2018/1139](#) and its delegated and implementing acts, it shall notify the Agency thereof without undue delay, and in any case within 30 days from the time it has become aware of those problems.
- (b) Without affecting [Regulation \(EU\) No 376/2014](#) of the European Parliament and of the Council¹ and its delegated and implementing acts, the competent authority shall provide the Agency, as soon as possible, with safety-significant information stemming from occurrence reports stored in the national database pursuant to Article 6(6) of Regulation (EU) No 376/2014.
- (c) The competent authority 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 to [Delegated Regulation \(EU\) 2022/1645](#).

[point (c) applicable from 27 March 2031 — Regulation (EU) 2025/23]

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

ED Decision 2025/006/R

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.

¹ Regulation (EU) No 376/2014 of the European Parliament and of the Council of 3 April 2014 on the reporting, analysis and follow-up of occurrences in civil aviation, amending Regulation (EU) No 996/2010 of the European Parliament and of the Council and repealing Directive 2003/42/EC of the European Parliament and of the Council and Commission Regulations (EC) No 1321/2007 and (EC) No 1330/2007 ([OJ L 122, 24.4.2014, p. 18](#), ELI: <http://data.europa.eu/eli/reg/2014/376/oj>).

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

ED Decision 2025/006/R

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 376/2014¹, specifically Section 4 'Competent authorities' and in particular Section 4.3 'How is the information shared among the competent authorities?'.

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

ED Decision 2025/006/R

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.

ARGH.GEN.135 Immediate reaction to a safety problem

Regulation (EU) 2025/23

- (a) Without affecting [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 safety-relevant information received and, without undue delay, provide the competent authority of 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 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.

¹ [Easy Access Rules for Occurrence Reporting \(Regulation \(EU\) No 376/2014\) - Revision from December 2022 - Available in pdf & online format | EASA.](#)

- (c) Upon receiving the information referred to in points (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 ground handling 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 ground handling organisation shall also be notified to the aerodrome operator where the ground handling organisation provides the ground handling services subject to those measures.

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

ED Decision 2025/006/R

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.

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

Regulation (EU) 2025/23

- (a) The competent authority shall implement a system for the collection, analysis, and dissemination of information related to information security incidents and vulnerabilities with a potential impact on aviation safety that are reported by ground handling organisations. This shall be done in coordination with any other relevant authorities responsible for information security or cybersecurity within the Member State concerned to increase the coordination and compatibility of reporting schemes.
- (b) The Agency shall implement a system for the analysis of any relevant safety-significant information received pursuant to 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 of the information security incident or vulnerability on aviation safety.
- (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.

[point ARGH.GEN.136 applicable from 27 March 2031 — Regulation (EU) 2025/23]

SUBPART MGM — MANAGEMENT

ARGH.MGM.200 Management system

Regulation (EU) 2025/23

- (a) The competent authority shall establish, implement and maintain a management system that includes all the following elements:
- (1) documented policies and procedures to describe its organisation, means and methods to achieve compliance of the competent authority with Regulation (EU) 2018/1139 and its delegated and implementing acts, which shall be kept up to date and serve as the basic working documents within that competent authority for all related tasks;
 - (2) sufficient personnel, including inspectors, to perform its tasks and discharge its responsibilities;
 - (3) adequate facilities and office accommodation to perform the allocated tasks;
 - (4) a function to monitor the 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;
 - (5) a person or group of persons, ultimately responsible to the senior management of the competent authority for the compliance monitoring function.
- (b) Regarding the personnel referred to in point (a)(2), the competent authority shall ensure the following:
- (1) the personnel shall have relevant aviation knowledge and experience and shall be adequately trained and qualified to perform the allocated tasks;
 - (2) the inspectors shall receive initial training, on-the-job training, and recurrent training to ensure their continued competence, depending on their previous qualification and experience upon taking up their functions;
 - (3) there shall be a system to plan the availability of personnel, in order to ensure the proper completion of all tasks.
- (c) The compliance monitoring function referred to in point (a)(4) shall include a feedback system of audit findings to the senior management of the competent authority to ensure implementation of corrective actions as necessary.
- (d) The competent authority shall appoint for each field of activity, including the management system, one or more persons with the overall responsibility for the management of the tasks referred to in point (a).
- (e) 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 [Commission Implementing Regulation \(EU\) 2023/203](#)¹ in order to ensure the proper management of information security risks which may have an impact on aviation safety.

[point (e) applicable from 27 March 2031 — Regulation (EU) 2025/23]

¹ 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 ([OJ L 31, 2.2.2023, p. 1](http://data.europa.eu/eli/reg_impl/2023/203/oj), ELI: http://data.europa.eu/eli/reg_impl/2023/203/oj).

AMC1 ARGH.MGM.200 Management system

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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

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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

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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

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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

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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

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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*ED Decision 2025/006/R***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;
 - (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

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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

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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

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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

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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

ED Decision 2025/006/R

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).

ARGH.MGM.205 Allocation of tasks to qualified entities

Regulation (EU) 2025/23

- (a) The competent authority may allocate to qualified entities tasks related to the registration of declarations or continuing oversight of ground handling 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) that authority has a system in place to initially and continually assess whether the qualified entity complies with Annex VI to Regulation (EU) 2018/1139;
 - (2) the system referred to in point (1) and the results of the assessments are documented;

- (3) the authority 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;
 - (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 ground handling 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 referred to in point [ARGH.MGM.200\(a\)\(4\)](#) of this Annex cover all tasks related to the acceptance of declarations or continuing oversight tasks performed on its behalf.
- (e) For the oversight of the ground handling organisation's compliance with point [ORGH.MGM.201](#) of Annex I to [Delegated Regulation \(EU\) 2025/20](#), 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 the relevant authority;
 - (2) the results of the oversight activities performed by the qualified entity or the relevant authority are integrated in the overall oversight files of the ground handling organisation;
 - (3) its own information security management system, established in accordance with point [ARGH.MGM.200\(e\)](#), covers all the continuing oversight tasks performed on its behalf.

[point (e) applicable as of 27 March 2031 — Regulation (EU) 2025/23]

ARGH.MGM.210 Changes to the management system

Regulation (EU) 2025/23

- (a) 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 laid down in [Regulation \(EU\) 2018/1139](#) and its delegated and implementing acts. That system shall enable it to take action, as appropriate, to ensure that its management system remains adequate and effective.
- (b) 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.
- (c) The competent authority shall notify the Agency of changes affecting its capability to perform its tasks and discharge its responsibilities as laid down in Regulation (EU) 2018/1139 and its delegated and implementing acts.

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

Regulation (EU) 2025/23

- (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 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](#) of this Annex. 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.325](#) of this Annex.
- (b) For other changes referred to in point IS.D.OR.255(b) of the Annex to Delegated Regulation (EU) 2022/1645, the competent authority shall check the ground handling organisation's compliance with the applicable requirements as part of the oversight tasks.

[point ARGH.MGM.211 applicable from 27 March 2031 — Regulation (EU) 2025/23]

ARGH.MGM.215 Record-keeping

Regulation (EU) 2025/23

- (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 the competent authority's personnel;
 - (3) if applicable, the allocation of tasks to qualified entities, covering the elements required by point [ARGH.MGM.205](#) 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 AltMoC proposed by organisations responsible for the provision of ground handling services and the assessment of AltMoC 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;
 - (9) the use of flexibility provisions laid down in Article 71 of [Regulation \(EU\) 2018/1139](#).
- (b) The competent authority shall maintain an up-to-date list of all the declarations it has received.
- (c) The records referred to in points (a) and (b) shall be kept for a minimum period of 5 years, subject to applicable Union data protection law.

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

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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

ARGH.OVS.300 Oversight

Regulation (EU) 2025/23

- (a) The competent authority shall verify both of the following during the oversight process:
 - (1) the continued compliance of the ground handling organisation with Delegated Regulation (EU) 2025/20 and the terms of its declaration;
 - (2) the implementation of appropriate safety measures mandated by the competent authority in accordance with point [ARGH.GEN.135](#).
- (b) The oversight referred to in point (a) shall:
 - (1) be supported by documentation intended to provide guidance for the competent authority personnel to perform their functions;
 - (2) provide the ground handling organisation concerned with the results of the oversight;
 - (3) be based on audits and inspections, including ramp and unannounced inspections, when appropriate;
 - (4) provide the competent authority with the evidence needed if further action is required, including the measures referred to in point [ARGH.OVS.325](#)(d).
- (c) The scope of the oversight shall consider the results of past oversight activities of the competent authority and the safety priorities as identified through the European Plan for Aviation Safety.
- (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) Where 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](#) of Annex I to [Delegated Regulation \(EU\) 2025/20](#), in addition to complying with points (a) to (d) of this point, the competent authority shall review any exemption granted under point IS.D.OR.200(e) of the Annex to [Delegated Regulation \(EU\) 2022/1645](#) following the applicable oversight audit cycle and whenever changes are implemented in the scope of work of the organisation.

[point (f) applicable from 27 March 2031 — Regulation (EU) 2025/23]

GM1 ARGH.OVS.300 Oversight

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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.

ARGH.OVS.305 Oversight programme

Regulation (EU) 2025/23

- (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:
- (1) the services provided by the ground handling organisation;
 - (2) the complexity of the ground handling organisation;
 - (3) the results of past oversight, where applicable;
 - (4) the assessment of risks associated with the ground handling services provided by the ground handling organisation and its risk exposure;
 - (5) the ground handling organisation's safety performance, where applicable.
- (c) The competent authority shall apply an oversight planning cycle not exceeding 48 months, starting from the date when the initial declaration is received. The oversight programme and planning shall reflect the safety performance of the ground handling organisation, as well as its risk exposure. The oversight cycle shall include audits and inspections, including unannounced inspections, as appropriate.
- (d) 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 ground handling organisation has demonstrated an effective management system, including compliance monitoring, identification of aviation safety hazards and management of associated risks;
 - (2) the ground handling organisation has continually demonstrated that it has full control over all changes in accordance with point [ORGH.GEN.130](#) of Annex I to [Delegated Regulation \(EU\) 2025/20](#);
 - (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 in accordance with point [ARGH.OVS.325](#)(d) of this Annex.
- (e) The oversight cycle may be reduced if there is evidence that the safety performance of the ground handling organisation has decreased or where specific hazards in the local conditions at the aerodrome of operation require enhanced oversight.
- (f) The oversight programme shall include records of the dates when audits and inspections are due and when they have been carried out.

AMC1 ARGH.OVS.305 Oversight programme

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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.

ARGH.OVS.310 Industry standards

Regulation (EU) 2025/23

For the purpose of gathering, exchanging and disseminating relevant information between the Commission, the Agency and the national competent authorities, the Agency, involving expertise provided by Member States, shall evaluate, against objective criteria, the content of industry standards and their updates, when used by ground handling organisations on a voluntary basis to discharge their responsibilities regarding the safe provision of ground handling services.

AMC1 ARGH.OVS.310 Industry standards

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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*ED Decision 2025/006/R***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*ED Decision 2025/006/R***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 guidelines¹ can be used to establish criteria for good practices:
- (1) eligibility criteria:
 - (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.

ARGH.OVS.315 Oversight tasks

Regulation (EU) 2025/23

- (a) The competent authority responsible for the oversight of an organisation providing ground handling services at aerodromes in that authority's Member State shall ensure that all the following aspects are verified during an oversight cycle:
- (1) compliance with [Annex I](#) to [Delegated Regulation \(EU\) 2025/20](#):
 - (i) the organisation's management system including the organisational structure, processes, programmes and procedures applicable to the ground handling organisation as a whole;
 - (ii) safety policies and processes, safety management system, including hazard identification, risk assessment and mitigation, including mitigation of safety risks specific to the operational context at the aerodrome(s) subject to oversight;
 - (iii) the safety and occurrence reporting process and the reports related to the station(s) subject to oversight;
 - (iv) the management of changes referred to in [ORGH.GEN.130](#) of Annex I to Delegated Regulation (EU) 2025/20 and the declaration;
 - (v) the compliance monitoring function;

¹ 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.

- (vi) the record-keeping and documentation system, including the ground handling manual;
 - (vii) the ground handling training programmes, including the training records;
 - (viii) the ground support equipment (GSE) maintenance programme;
 - (ix) any other overarching organisational processes, programmes and procedures within the scope of the ground handling organisation's declaration and applicable to that organisation as a whole;
- (2) compliance with the operational requirements of [Annex II](#) to Delegated Regulation (EU) 2025/20.
- (b) When overseeing an organisation providing ground handling services in more than one Member State, the provisions of point [ARGH.OVS.330](#) shall apply.

AMC1 ARGH.OVS.315(a) Oversight tasks

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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.

ARGH.OVS.320 Declaration of ground handling organisations

Regulation (EU) 2025/23

- (a) Upon receiving a declaration from a ground handling organisation, the competent authority shall acknowledge the receipt of the declaration or the notification of change, including the assignment of an individual reference number, 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 I to [Delegated Regulation \(EU\) 2025/20](#). The competent authority shall ensure that the declaration is transmitted to the Repository of Information, in accordance with the terms and conditions of [Commission Implementing Regulation \(EU\) 2023/2117](#)¹.
- (b) If the declaration is not duly filled in or contains information that is not in accordance with point [ORGH.DEC.100](#) and the [Appendix to Subpart ORGH.DEC](#) of Annex I to Delegated

¹ Commission Implementing Regulation (EU) 2023/2117 of 12 October 2023 laying down the necessary rules and detailed requirements for the functioning and management of a repository of information pursuant to Regulation (EU) 2018/1139 of the European Parliament and of the Council ([OJ L 2023/2117](#), 13.10.2023, ELI: http://data.europa.eu/eli/reg_impl/2023/2117/oj).

Regulation (EU) 2025/20, the competent authority shall notify the ground handling organisation about the missing or incorrect elements and request further information. If deemed necessary, the competent authority shall carry out an inspection of the ground handling organisation. If the non-compliance is confirmed, the competent authority shall take action as defined in point [ARGH.OVS.325](#).

- (c) If the declaration contains information that the ground handling organisation provides or intends to provide services also at aerodromes in other Member States, the competent authority receiving the declaration or the notification of change shall ensure all the other competent authorities concerned are informed and have access to the declaration, the notification of change, and all related documentation.

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

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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.

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

Regulation (EU) 2025/23

- (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 [Delegated Regulation \(EU\) 2025/20](#) is established as soon as possible;
 - (2) preventing their reoccurrence.
- (b) The competent authority shall issue a level 1 finding where it detects any significant non-compliance with Delegated Regulation (EU) 2025/20 or of the declaration submitted, which lowers flight or ground safety or seriously jeopardises it.

The level 1 findings shall include, in particular, the following:

- (1) any failure to grant access of the competent authority to the facilities of the ground handling organisation pursuant to point [ORGH.GEN.140](#) of Annex I to Delegated Regulation (EU) 2025/20 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) The competent authority shall issue a level 2 finding where it detects any non-compliance with Delegated Regulation (EU) 2025/20 or of the declaration submitted, which is not classified as a level 1 finding and which could lower flight or ground safety or possibly jeopardise it.
- (d) Where the competent authority, during investigation or oversight or by any other means, finds evidence that the ground handling organisation does not comply with Delegated Regulation (EU) 2025/20 or the declaration submitted in accordance with point [ORGH.DEC.100](#) of that Regulation, the competent authority shall:
- (1) raise a finding, record it, communicate it in writing to the representative of the ground handling organisation, and determine a reasonable period of time within which the organisation shall take the measures specified in point [ORGH.GEN.150](#) of Annex I to Delegated Regulation (EU) 2025/20;
 - (2) in case of level 1 findings, if the ground handling organisation fails to submit an acceptable corrective action in accordance with point [ORGH.GEN.150](#) of Annex I to Delegated Regulation (EU) 2025/20, take immediate and appropriate action to limit or prohibit the ground handling activities affected by the non-compliance until it has taken the corrective action referred to in point (1); the competent authorities involved in the oversight of the organisation shall assess whether failure to close a level 1 finding by one competent authority affects operation at the aerodromes under their oversight and shall take the appropriate action based on that assessment;
 - (3) in case of level 2 findings:
 - (i) request that the organisation provides a corrective-action plan including an implementation period appropriate to the nature of the finding which, in any case, shall initially be no longer than 3 months; 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 revision by the organisation of the initial corrective-action plan with which it had agreed;
 - (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 ground handling 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 competent authority may escalate the level 2 finding to a level 1 finding, and take action as laid down in point (2);
 - (4) in applying the actions listed in points (2) and (3), coordinate with the other competent authorities concerned, as necessary, to ensure that the continuity of operation and provision of ground handling 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) record all findings it has raised and, where applicable, the enforcement measures it has applied as specified in Article 62(2) points (d) and (e), of [Regulation \(EU\) 2018/1139](#), 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 relating to the ground handling organisation if those are relevant for the safety of that aerodrome.

- (f) For cases not requiring level 1 or level 2 findings, the competent authority may issue observations.

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

ED Decision 2025/006/R

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).

ARGH.OVS.330 Cooperative oversight

Regulation (EU) 2025/23

- (a) The competent authorities responsible for the oversight of organisations providing ground handling 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 a Member State and providing ground handling services in more than one Member State or at aerodromes that are under the oversight responsibility of more than one competent authority:
- (1) independent providers of ground handling services;
 - (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 ground handling organisations and related documents to prove compliance with [Regulation \(EU\) 2018/1139](#) and its delegated and implementing acts;
 - (2) AltMoC used;
 - (3) audit reports, findings raised, 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;
 - (4) information stemming from mandatory and voluntary occurrence reporting as required by point [ORGH.GEN.160](#) of Annex I to [Delegated Regulation \(EU\) 2025/20](#).
- (d) The tasks for the oversight of a ground handling organisation referred to in point (b) shall be assigned in accordance with points (e) and (f).
- (e) The competent authority of the Member State where the organisation has its principal place of business shall verify all the following elements listed in [Annexes I and II](#) to Delegated Regulation (EU) 2025/20, either on its own or supported by any of the other competent authorities concerned, followed by inspections of ground handling activities performed at aerodromes in its State, to verify that the implementation of the organisation's management system elements is performed as documented:
- (1) the organisation's management system elements referred to in point [ORGH.MGM.200](#) of Annex I to Delegated Regulation (EU) 2025/20 relating to the organisational structure, processes, programmes and procedures applicable to the ground handling organisation as a whole;
 - (2) safety policies and processes, safety management system, including hazard identification, risk assessment and mitigation, including mitigation of safety risks specific to the operational context at the aerodrome(s) subject to oversight;
 - (3) the safety and occurrence reporting process and the reports related to the provision of ground handling services at the aerodrome(s) subject to oversight;
 - (4) the management of changes and the declaration;
 - (5) the compliance monitoring function;
 - (6) the record-keeping and documentation system, including the ground handling manual;
 - (7) the ground handling training programmes, including the training records;
 - (8) the GSE maintenance programme;
 - (9) any other overarching organisational processes, programmes and procedures within the scope of its declaration and applicable to the organisation as a whole.
- (f) Each competent authority of the Member States where the organisation provides ground handling 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:
- (1) the organisation's management system elements referred to in point [ORGH.MGM.200](#) of Annex I to Delegated Regulation (EU) 2025/20, particularly relating to the ground handling organisation's activities at the station under its oversight:
 - (i) the organisational structure referred to in point [ORGH.MGM.200](#)(b)(1) of Annex I to Delegated Regulation (EU) 2025/20 and the ground handling activities;

- (ii) hazard identification;
 - (iii) the risk assessment and mitigation, including mitigation of safety risks specific to the provision of services at the station(s) subject to oversight;
 - (iv) the content of the ground handling manual, including the procedures and instructions of the aircraft operators operating at the station(s) subject to oversight, as well as the procedures of the relevant aerodrome operator(s);
 - (v) training records and implementation of the training programme at the station(s) subject to oversight;
 - (vi) the GSE maintenance programme;
 - (vii) occurrence reports and internal safety reports relevant for the provision of ground handling services at the station(s) subject to oversight;
- (2) the operational requirements of [Annex II](#) to Delegated Regulation (EU) 2025/20.
- (g) Each of the competent authorities referred to in points (e) and (f) shall:
 - (1) agree with the ground handling organisation on the proposed corrective-action plan and corrective actions to address the non-compliances identified at the station under their oversight;
 - (2) inform all the other competent authorities concerned on the audits and inspections reports and the corrective actions.
 - (3) In case of a level 1 finding raised to an organisation 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.
 - (4) In case of a level 1 finding raised on the 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.
- (h) 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 assessment of the safety performance of the organisation based on the oversight reports from individual stations in the other Member States.
- (i) Any of the competent authorities responsible for the oversight of an organisation referred to in point (b) may support the competent authority of the Member State where the organisation has its principal place of business in performing the audits or inspections as specified in point (e).
- (j) The competent authorities concerned shall establish procedures for the implementation of the cooperative oversight process to cover all the aspects detailed in points (a) to (i).
- (k) The competent authorities shall use the repository of information established 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(a) Cooperative oversight

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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

ED Decision 2025/006/R

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.
- (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.

COMMISSION DELEGATED REGULATION (EU) 2025/20

COVER REGULATION

COMMISSION DELEGATED REGULATION (EU) 2025/20

of 19 December 2024

supplementing Regulation (EU) 2018/1139 of the European Parliament and of the Council by laying down requirements for the safe provision of ground handling services and for organisations providing them

Powers and recitals

Regulation (EU) 2025/20

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to [Regulation \(EU\) 2018/1139](#) of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91¹, and in particular Article 39(1), points (d) and (e) thereof,

Whereas:

- (1) Regulation (EU) 2018/1139 establishes the essential requirements for the safe provision of ground handling services and organisations providing them at the Union aerodromes within the scope of that Regulation. Article 37(2) requires providers of ground handling services to make a declaration regarding their capability to discharge their responsibilities associated with the safe provision of ground handling services.
- (2) To ensure a total-system approach and guarantee a baseline for safety in all aviation-related activities, and in line with the principle of subsidiarity, detailed rules for the provision of ground handling services and the privileges and responsibilities of organisations providing them should be laid down.
- (3) Pursuant to Article 4 of Regulation (EU) 2018/1139, those rules are to reflect the state of the art and best practices in the field of ground handling; take into account the applicable International Civil Aviation Organization ('ICAO') Standards and Recommended Practices ('SARPs') and worldwide ground handling operation experience, as well as scientific and technical progress in the ground handling domain; be proportionate to the size and complexity of the ground handling activities; and provide for the necessary flexibility for customised compliance.
- (4) The Regulation should ensure a level playing field for the provision of ground handling services for all organisations providing those services, including self-handling by aircraft operators, at aerodromes within the scope of Regulation (EU) 2018/1139.
- (5) For aircraft operators performing self-handling or aerodrome operators providing ground handling services, which already have management system structures required under other

¹ [OJ L 212, 22.8.2018](#), p. 1, ELI: <http://data.europa.eu/eli/reg/2018/1139/oj>.

Union regulations in the aviation sector, the ground handling requirements should be easy to integrate so as to create minimum disruptions to the established system of organisations and national competent authorities. Therefore, this Regulation should be aligned as much as possible particularly with Commission Regulations [\(EU\) No 965/2012](#)¹ and [\(EU\) No 139/2014](#)², as the ground handling domain is an interface between air operations and aerodrome operations, and therefore the management systems as regulated by these acts should be aligned and the necessary cross-references established.

- (6) This Regulation does not cover those ground handling activities that are already regulated by other acts, such as flight dispatch, load control, and ground supervision, which are covered by Regulation (EU) No 965/2012, marshalling of aircraft, which is covered by Regulation (EU) No 139/2014, or oil handling, which is covered by [Commission Regulation \(EU\) No 1321/2014](#)³.
- (7) In line with the proportionality principle, with regard to self-handling by aircraft operators, this Regulation should only apply to self-handling activities by aircraft operators performing commercial air transport operations with complex motor-powered aircraft. It is considered that Regulation (EU) No 965/2012 sufficiently addresses the safety risks of self-handling activities performed by operators conducting any operations that are not commercial air transport operations, either with complex or with other-than-complex motor-powered aircraft.
- (8) The measures provided for in this Regulation should improve and promote the safety of ground handling services and a safety culture within the organisations providing such services. Therefore, the requirements laid down in this Regulation should provide the necessary tools and a description of the process for organisations to implement a safety reporting system, to help them collect and analyse the safety data obtained from those reports, and to establish and foster a safety culture with each individual employed in their organisation.
- (9) With this Regulation, ground handling organisations are to assume full responsibility for the safe provision of services, their operations, and control the operational risks of their activities, while aircraft operators continue to remain responsible for the safety of the aircraft and for the flight, while aerodrome operators continue to remain responsible for the safe operation of aerodromes. Therefore, ground handling organisations should develop and implement a management system with effective safety management processes capable of identifying and managing the safety risks, including those arising from interfaces with the aircraft operators and the aerodrome operators, through the application of adequate and proportionate mitigation measures.
- (10) The management system developed and implemented by ground handling organisations should be proportionate, scalable to the size and complexity of their organisation and activities, and should cover the management of safety, management of changes, safety reporting, training of personnel, records and documentation, maintenance of ground support equipment used, identification of safety-related interfaces with other stakeholders involved in ground handling activities, operational procedures, and compliance monitoring. Ground handling organisations should strive to develop and foster an organisational safety culture, in which employees

¹ Commission Regulation (EU) No 965/2012 of 5 October 2012 laying down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council ([OJ L 296, 25.10.2012, p. 1](#), ELI: <http://data.europa.eu/eli/reg/2012/965/oj>).

² Commission Regulation (EU) No 139/2014 of 12 February 2014 laying down requirements and administrative procedures related to aerodromes pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council ([OJ L 44, 14.2.2014, p. 1](#), ELI: <http://data.europa.eu/eli/reg/2014/139/oj>).

³ Commission Regulation (EU) No 1321/2014 of 26 November 2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks ([OJ L 362, 17.12.2014, p. 1](#), ELI: <http://data.europa.eu/eli/reg/2014/1321/oj>).

understand their individual importance in the aviation safety chain and contribute actively to maintaining and improving the level of safety in their daily operational tasks. This Regulation contains provisions to support organisations to develop and cultivate a healthy reporting culture.

- (11) To ensure a common approach in addressing the safety risks arising from the interfaces between ground handling, aircraft and aerodrome operations, and to promote a common understanding of hazards and risks, ground handling organisations, aircraft operators and aerodrome operators should have the same safety information and safety data when these are relevant for them and when these information and data may affect the safety performance of either organisation. To achieve this, such organisations should be able to share among themselves relevant safety information, as well as information resulting from occurrence reports or oversight inspections and audits.
- (12) Ground handling services, provided to an aircraft at an aerodrome, are an interface in themselves between aircraft and aerodrome operations. The safety risks arising from this situation should be properly acknowledged through a regulatory framework for the interaction between organisations, so as to enable them to identify those operational interfaces having an effect on safety and apply proper mitigation measures to minimise the risks in operation. At the same time, ground handling organisations should be able to discuss safety on an equal ground with the other stakeholders involved in those operational interfaces and provide them with the possibility to apply their own operational procedures if they are based on their safety risk management processes and if this is agreed with the aircraft operator to which they provide services.
- (13) To ensure a smooth transition from the existing national regulations of the Member States to this Regulation, it is necessary to provide ground handling organisations that are already operating at the time when this Regulation becomes applicable with sufficient time and minimum conditions to shift from the existing national regulations of the Member States to this Regulation.
- (14) Training of ground handling operational personnel is one of the most important measures for mitigating the safety risks in ground handling activities. Ground handling organisations should ensure that all operational personnel involved in ground handling activities are competent to provide those services. The competence of the operational personnel should always be maintained. Therefore, this Regulation establishes minimum requirements regarding the training and assessment programme for the safety-relevant personnel to ensure that they develop and maintain the competencies necessary to perform their tasks safely and effectively.
- (15) To support the mobility of personnel across ground handling organisations and to reduce the training costs upon re-training of a new employee that has already achieved the required qualifications at the previous employment, ground handling personnel should be able to easily provide proof of training already completed. The ground handling organisation should therefore provide to the employee a copy of respective training records, upon request, which should enable the easy assessment and mutual recognition of training across organisations subject to this Regulation.
- (16) Flight safety and safe provision of ground handling services depend heavily on the use of functional, properly maintained ground support equipment. The functionality of the equipment used for the provision of ground handling services should be ensured by the application of a maintenance programme, including preventive maintenance, developed and applied in accordance with instructions and manuals of the equipment manufacturer. The rules should also be technology-neutral, to allow innovations and a smooth adoption of new technologies at

a fast pace, while keeping an environmentally friendly approach towards the choice of ground support equipment. At the same time, the rules should provide the possibility for organisations to adopt and implement practices and business models that minimise aerodrome congestion and make aerodrome operations safer and more efficient, such as equipment pooling or a safety stack model, where the aerodrome specificity allows for the implementation of such business models.

- (17) This Regulation should ensure a pragmatic and balanced approach between prescriptive and performance-based rules. Flexibility in the approach towards requirements on operational procedures for ground handling services is a key to achieving the safety objectives. Therefore, it is essential that the requirements covering the operational procedures remain performance-based and rely on the voluntary application of industry standards and good practices, as well as operational procedures well established by aircraft operators and ground handling organisations.
- (18) The essential requirements in Annex VII, point 4.1(c) to Regulation (EU) 2018/1139 mandate that organisations provide ground handling services in accordance with the operational instructions and procedures of the aircraft operators. The operational procedures for the same ground handling service and to the same type of aircraft may differ significantly between aircraft operators, and this increases the risk of human error as it could lead to aircraft damage and endanger flight safety. The essential requirements in Annex VII point 4.2.3 to Regulation (EU) 2018/1139 require that ground handling organisations develop their own operational procedures for the provision of ground handling services. This Regulation enables ground handling organisations to apply their own operational procedures if this is agreed by the aircraft operator. Furthermore, this Regulation makes ground handling organisations formally accountable and responsible for the safety of their own services by the application of an effective safety management system. This should also support ground handling organisations in developing, assessing, discussing and agreeing with the aircraft operators on common operational procedures that are safe for both parties. All these elements, placed in several requirements, should improve the existing level of trust between the aircraft operator and its provider of ground handling services, and lead towards a harmonisation of the operational procedures.
- (19) This Regulation should further ensure that it provides solid elements for organisations to improve their analysis of causes of events identified through their own compliance monitoring processes or through the national competent authority oversight, and also to improve their safety reporting culture. At the same time, the Regulation should also provide a framework for the provision by the national competent authorities of direct and consistent feedback on reported ground handling events directly to the ground handling organisations.
- (20) It is necessary to provide sufficient time for the ground handling industry and national competent authorities to implement the new regulatory framework after the entry into force of this Regulation, therefore a transition period of 3 years should be provided for its deferred applicability and a transition period of 6 years should be provided for the deferred applicability of the requirements covering the information security management.
- (21) The requirements laid down in this Regulation are based on Opinion No 01/2024¹ issued by the Agency in accordance with Article 75(2), points (b) and (c), and Article 76(1) of Regulation (EU) 2018/1139.

¹ <https://www.easa.europa.eu/en/document-library/opinions/opinion-no-012024>.

(22) In accordance with Article 128(4) of Regulation (EU) 2018/1139, the Commission consulted experts designated by each Member State in accordance with the principles laid down in the Interinstitutional Agreement of 13 April 2016 on Better Law-Making¹,

HAS ADOPTED THIS REGULATION:

Article 1 — Subject matter

Regulation (EU) 2025/20

This Regulation establishes common requirements for the provision of ground handling services and organisations providing them at aerodromes within the scope of [Regulation \(EU\) 2018/1139](#).

Article 2 — Scope

Regulation (EU) 2025/20

1. This Regulation shall apply to the ground handling organisations that provide any of the ground handling services specified in paragraph 2 at one or more aerodromes within the scope of [Regulation \(EU\) 2018/1139](#).
2. This Regulation shall apply to the following services provided to aeroplanes:
 - (a) passenger handling, including passengers with reduced mobility, including safety aspects of passenger and baggage acceptance at the aerodrome, safety of passengers during boarding and disembarkation using ground support equipment and during transit or transfer, and ground transportation of passengers between the aerodrome terminal and the aircraft;
 - (b) baggage handling, including baggage identification, sorting, building, transfer, arrival and reclaim;
 - (c) the following aircraft servicing activities:
 - (i) operation of ground support equipment (GSE) used for ground handling services, including loading and unloading of catering, and the movement of those GSE on the apron and around the aircraft;
 - (ii) aircraft refuelling and defuelling, namely into-plane fuelling services at the aerodrome;
 - (iii) aircraft toilet servicing;
 - (iv) potable water servicing;
 - (v) aircraft exterior cleaning;
 - (vi) aircraft de-icing and anti-icing;
 - (d) the following aircraft turnaround activities:
 - (i) activities upon aircraft arrival, including aircraft securing on the ground;
 - (ii) loading and unloading of baggage, cargo, mail, catering, and loading supervision;
 - (iii) activities upon aircraft departure;
 - (iv) aircraft towing and pushback;

¹ [OJ L 123, 12.5.2016](#), p. 1, ELI: http://data.europa.eu/eli/agree_interinstit/2016/512/oj.

- (e) the following cargo and mail handling at an aerodrome:
 - (i) cargo acceptance on behalf of the aircraft operator;
 - (ii) final build-up and storage;
 - (iii) final weighing and tagging of unit load devices;
 - (iv) final checks before air transportation;
 - (v) ground transportation of cargo and mail between the point of final checks and the aircraft.
- 3. This Regulation shall not apply to the following activities and organisations performing them:
 - (a) marshalling of aircraft;
 - (b) flight dispatch tasks performed by flight dispatchers as defined by [Regulation \(EU\) No 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;
 - (d) ground supervision;
 - (e) oil handling for the aircraft (including replenishment, servicing) performed by maintenance organisations approved under [Regulation \(EU\) No 1321/2014](#), other organisations compliant with Regulation (EU) No 1321/2014, and other maintenance organisations holding an approval issued in compliance with ICAO Annex 8 Chapter 6;
 - (f) aircraft exterior cleaning when performed by maintenance organisations approved under Regulation (EU) No 1321/2014, other organisations compliant with Regulation (EU) No 1321/2014, and other maintenance organisations holding an approval issued in compliance with ICAO Annex 8 Chapter 6 and the activity is included in the organisation's maintenance manual;
 - (g) any other ground handling activity when performed by a maintenance organisation approved under Regulation (EU) No 1321/2014, other organisations compliant with Regulation (EU) No 1321/2014, and other maintenance organisations holding an approval issued in compliance with ICAO Annex 8 Chapter 6 for the purpose of aircraft maintenance;
 - (h) ground transportation of passengers and crew members when this is the only service provided by an entity;
 - (i) self-handling, when performed by aircraft operators performing any of the following types of operations:
 - (i) commercial air transport operations with other-than-complex motor-powered aircraft;
 - (ii) any flight operations with complex or other-than-complex motor-powered aircraft that are not commercial air transport operations;
 - (j) handling of passengers with reduced mobility, or ground transportation of passengers and crew members, or both, when these are the only ground handling services provided by an aerodrome operator with its own personnel, not cumulated with other ground handling services provided by that aerodrome operator.

GM1 Article 2(1) Scope

ED Decision 2025/007/R

PROVISION OF GH SERVICES FROM AN OFF-AIRPORT LOCATION

Organisations providing GH services from a location other than an aerodrome subject to [Regulation \(EU\) 2018/1139](#) and its delegated and implementing acts are not subject to [Commission Delegated Regulation \(EU\) 2025/20](#). The services provided by such organisations are included in 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 these services:

- (a) passenger and baggage acceptance, at off-airport locations,
- (b) load control (load planning and production of related documents).

GM1 Article 2(2) Scope

ED Decision 2025/007/R

PASSENGER HANDLING

The safety aspects of passenger handling covered by [Commission Delegated Regulation \(EU\) 2025/20](#) are the following:

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

All aspects above include passengers with reduced mobility (PRMs).

GM2 Article 2(2) Scope

ED Decision 2025/007/R

GROUND SUPPORT EQUIPMENT

The following items of GSE are within the scope of [Commission Delegated Regulation \(EU\) 2025/20](#), regardless of their level of automation (requiring or not requiring human intervention). The list is based on *IATA Airport Handling Manual (AHM)*:

- (a) lifting and elevating equipment:
 - (1) aircraft tail stand,
 - (2) belt loader, with or without in-hold conveyor system,
 - (3) catering vehicle,
 - (4) aircraft exterior cleaning equipment,
 - (5) de-icing/anti-icing vehicle/equipment,

- (6) elevating work platform or equipment,
- (7) forklift,
- (8) loader (lower deck or main deck),
- (9) maintenance stairs,
- (10) mobile passenger boarding ramps,
- (11) passenger stairs,
- (12) PBBs,
- (13) boarding vehicle for PRMs;
- (b) servicing equipment:
 - (1) aircraft air conditioning unit (ACU)
 - (2) aircraft fuelling dispenser (pump),
 - (3) aircraft fuelling truck or cart,
 - (4) aircraft heating unit,
 - (5) aircraft start unit (ASU)
 - (6) ground power unit (GPU)
 - (7) lavatory service equipment,
 - (8) potable water service equipment;
- (c) towing equipment, including remote controlled vehicles:
 - (1) tractor for baggage, cargo or aircraft equipment,
 - (2) aircraft towing or pushback vehicle (tractor, tug, truck),
 - (3) towbar,
 - (4) towbarless tractor,
 - (5) interchangeable tow bar heads;
- (d) transporting equipment:
 - (1) bus (for passengers or crew),
 - (2) car, van or pick-up truck,
 - (3) cart or dolly (for baggage, cargo, unit load device (ULD) or aircraft equipment),
 - (4) fuelling truck,
 - (5) temperature-controlled cargo dolly,
 - (6) temperature-controlled cargo truck,
 - (7) trailer (for baggage, cargo, ULD or aircraft equipment),
 - (8) truck (for baggage, cargo, ULD or aircraft equipment),
 - (9) ULD transporter (to move ULD to/from high loaders);
- (e) other equipment used to provide GH services:
 - (1) aircraft chocks,

- (2) aircraft cones,
- (3) retractable stanchions, passenger guiding systems and parts thereof.

GM3 Article 2(2) Scope

ED Decision 2025/007/R

ACTIVITIES UPON AIRCRAFT ARRIVAL

The following activities take place before and after an aircraft is parked at the stand:

- (a) prior to aircraft arrival:
 - (1) checking the aircraft stand for any FOD;
 - (2) checking the conditions of the surface stand for any ice, snow, etc.;
 - (3) preparing the necessary GSE, chocks and cones outside the equipment restraint area;
 - (4) ensuring that the necessary personnel are available for aircraft arrival activities and remain outside the aircraft manoeuvring path and within the safety zones;
- (b) after the aircraft has been parked:
 - (1) securing the aircraft on the ground by putting chocks on the aircraft wheels and setting out safety cones to mark the equipment restraint area;
 - (2) performing a walkaround upon aircraft arrival to inspect the aircraft fuselage, doors and engine cowlings/propellers for any damage;
 - (3) giving clearance for the positioning of the necessary GSE (air conditioning unit, ground power unit, passenger stairs or boarding bridges, etc.).

GM4 Article 2(2) Scope

ED Decision 2025/007/R

ACTIVITIES UPON AIRCRAFT DEPARTURE

These activities include, but are not limited to:

- (a) removing the PBB and any other external equipment and vehicles from the aircraft and the equipment restraint area (ERA);
- (b) verifying that aircraft doors and panels are properly closed;
- (c) conducting an aircraft walkaround;
- (d) checking for FOD;
- (e) ensuring the availability of towing/pushback equipment;
- (f) ensuring that all persons and equipment are outside the aircraft danger areas;
- (g) any other activity necessary in accordance with the GH organisation's procedures and the local aerodrome operator's procedures.

GM5 Article 2(2) Scope

ED Decision 2025/007/R

CARGO AND MAIL HANDLING IN A CARGO WAREHOUSE

- (a) Cargo handling is a complex activity that involves various entities responsible for different segments of cargo preparation and transport. Not all those entities are included in the scope of [Commission Delegated Regulation \(EU\) 2025/20](#). For example, the following entities are excluded from the scope of the Regulation:
 - (1) organisations that do not perform activities listed in [Article 2\(2\)](#) of Commission Delegated Regulation (EU) 2025/20 at the premises of an aerodrome within the scope of [Regulation \(EU\) 2018/1139](#);
 - (2) organisations like freight forwarders or shippers;
 - (3) organisations that only transport cargo on the ground from one location/warehouse to another before being checked for acceptance for air transport.
- (b) The GH activities related to cargo and mail handling usually occur in a cargo warehouse. Like the entities involved in the cargo transport chain, not all cargo warehouses are included in the scope of Commission Delegated Regulation (EU) 2025/20.
- (c) Only the cargo warehouses that are located at an aerodrome or adjacent to it and that are responsible for final cargo checks and acceptance before the cargo is loaded on the aircraft are included in the scope of Commission Delegated Regulation (EU) 2025/20.
- (d) Furthermore, only the safety-related activities occurring in a cargo warehouse that may have an impact on the safety of the flight are included in the scope of Commission Delegated Regulation (EU) 2025/20.

GM6 Article 2(2) Scope

ED Decision 2025/007/R

ORGANISATIONS OUTSIDE THE SCOPE OF COMMISSION DELEGATED REGULATION (EU) 2025/20 THAT OPERATE GSE AROUND THE AIRCRAFT

- (a) Organisations that move GSE to and from the aircraft or connect GSE to the aircraft to complete their tasks but are outside the scope of [Commission Delegated Regulation \(EU\) 2025/20](#) are not required to declare their activities. However, as the operation of GSE is included in the scope of the Regulation, it is subject to oversight by the competent authority responsible for the oversight of the safe provision of GH services at the aerodrome of operation. The GSE and its operation are subject to compliance with the safety and maintenance requirements of Commission Delegated Regulation (EU) 2025/20.
- (b) Examples of GH services that may use GSE in close proximity to the aircraft: aircraft interior cleaning and in-flight services.
- (c) GSE moved to and from the aircraft for aircraft maintenance purposes is covered by [Regulation \(EU\) No 1321/2014](#).

GM1 Article 2(3) Scope

ED Decision 2025/007/R

MARSHALLING OF AIRCRAFT

- (a) Organisations that provide aircraft marshalling services are required to comply with the requirements of [Regulation \(EU\) No 139/2014](#) applicable to aircraft marshalling.
- (b) If such organisations also provide GH services that are included in the scope of [Commission Delegated Regulation \(EU\) 2025/20](#), this Regulation is applicable to them and they are expected to declare their activities in accordance with Subpart [ORGH.DEC](#), except for the marshalling services.

GM2 Article 2(3) Scope

ED Decision 2025/007/R

FLIGHT DISPATCH

Although the term ‘flight dispatch’ is included in the definition of ‘ground handling’ in [Regulation \(EU\) 2018/1139](#), [Commission Delegated Regulation \(EU\) 2025/20](#) does not regulate those activities or their providers for the following reasons.

- (a) The flight dispatch function is linked to the operational control system of an aircraft operator and is therefore considered a flight operations function, which is covered by [Regulation \(EU\) No 965/2012](#) and the associated AMC and GM. This function may be outsourced to a third-party service provider.
- (b) The term ‘flight dispatcher’ is defined in Regulation (EU) No 965/2012 and ICAO Annex 6, both regarding air operations, as an individual with specific qualifications and training compliant with ICAO Annex 1 who has specific tasks in the operational control system of the aircraft operator, including to support, brief or assist the pilot-in-command in the safe conduct of the flight. The flight dispatcher function is considered a typical ‘flight operations’ function. The flight dispatcher’s tasks and responsibilities can be found in Regulation (EU) No 965/2012.
- (c) The term ‘dispatcher’ is also used in ground operations, but it is not defined. For ground operations, the dispatcher performs a GH function that confirms to the aircraft operator’s flight dispatcher or the flight crew that all GH activities have been completed and that, from a GH perspective, the aircraft is prepared to leave the stand. Other terms may be used to describe this function, such as ‘ramp coordinator’ or ‘ramp supervisor’.
- (d) Although the meaning of the term may be clear in the mind of the user, it is not always clear to others whether the user is referring to the function explained in point (b), related to the operational control system, or to the ground function explained in point (c). The confusion generated by the use of the same term to indicate two different functions may persist, as one usually associates a term only with tasks in the domain with which one is more familiar — that is, either air operations or ground operations, but rarely both. This may have safety implications due to the numerous interfaces between air operations and GH for operational procedures on the ground.
- (e) To avoid the confusion described above, it is recommended that GH organisations avoid using the terms ‘flight dispatch’ or ‘(flight) dispatcher’ when describing typical GH tasks to prepare an aircraft for departure.

GM3 Article 2(3) Scope

ED Decision 2025/007/R

LOAD PLANNING, LOAD CONTROL MESSAGES AND COMMUNICATIONS, AND ISSUANCE OF LOAD CONTROL DOCUMENTS

- (a) The scope of [Commission Delegated Regulation \(EU\) 2025/20](#) does not cover the provision of load planning services, mass and balance calculations or load control messaging and communications, or the issuance of related documents. These activities are included in the scope of [Regulation \(EU\) No 965/2012](#). When outsourced to a third-party provider, the responsibility for the safety of these services is covered by point ORO.GEN.205 of Regulation (EU) No 965/2012.
- (b) The load control function is specific to the operator's fleet and operational context. It may be performed by an organisation at an aerodrome or outside an aerodrome or by the personnel of the aircraft operator itself.
- (c) The load control process is classified into two distinct phases:
 - (1) Phase 1: mass and balance (M&B) calculations, load planning, load control communications and messaging, and issuance of load control documents (load sheet, loading instructions/report (LIR) or notification to captain (NOTOC) when necessary). These activities may be executed from an aerodrome or a remote location.
 - (2) Phase 2: load control communication — that is, verification of load against the loading instructions and communication of any last-minute changes to the mass and balance documentation. These activities take place at an aerodrome, as part of the preparation of the aircraft for departure.
- (d) The aircraft operator is responsible for ensuring the compliance of activities included in phase 1 — that is, mass and balance calculations, load planning, load control communications and messaging, and issuance of load control documents — with the relevant requirements of Regulation (EU) No 965/2012. This applies at all times, regardless of whether these tasks are performed by the aircraft operator itself or outsourced as a contracted activity. These activities are overseen by the competent authority of the aircraft operator.
- (e) The GH organisation is responsible for the activities included in phase 2, which take place on an aircraft, at the aerodrome. These activities are overseen by the competent authority for GH of the aerodrome where they are performed.

GM4 Article 2(3) Scope

ED Decision 2025/007/R

GROUND SUPERVISION

- (a) Ground supervision may be contracted by an operator as an individual service. It is usually associated with ground administration services provided by a GH organisation on behalf of the operator.
- (b) This service includes the supervision and/or coordination of one or more GH activities on behalf of an operator, which may be performed by one or more providers of GH services.
- (c) Organisations that provide ground supervision are required to comply with the relevant requirements of [Regulation \(EU\) No 965/2012](#).
- (d) If such organisations also provide other GH services that are included in the scope of [Commission Delegated Regulation \(EU\) 2025/20](#), the Regulation is applicable to them. They are

expected to declare their activities in accordance with Subpart [ORGH.DEC](#), except for the ground supervision services and any other GH services listed in [Article 2\(3\)](#) of the Regulation.

- (e) Ground supervision comprises activities such as:
- (1) providing official representation for the contracting aircraft operator in relation to the aerodrome authorities or other organisations operating at that aerodrome, issuing disbursements on behalf of the aircraft operator, and ensuring the provision of office space for representatives of the operator;
 - (2) setting key performance indicators for operational performance;
 - (3) organising workflows and conducting operational planning;
 - (4) reporting incidents, accidents and near misses;
 - (5) activating and coordinating emergency responses, in accordance with the operator's procedures;
 - (6) communicating with the aircraft operator;
 - (7) handling, storing and administering ULDs;
 - (8) supervising operational functions in the areas of:
 - (i) passenger and baggage handling,
 - (ii) ramp handling,
 - (iii) load control;
 - (9) any other administrative services requested by the aircraft operator.
- (f) Ground supervision does not include a GH organisation's management of its own activities.
- (g) Ground supervision does not imply that the individual performing this function will replace, when necessary, an individual performing a GH operation.
- (h) A person responsible for ground supervision may act on behalf of more than one aircraft operator to ensure the safe delivery of the services by GH organisations.

GM5 Article 2(3) Scope

ED Decision 2025/007/R

OIL HANDLING

- (a) Aircraft oil handling means replenishing the aircraft's oil. Like any other activity related to aircraft maintenance, it is subject to [Regulation \(EU\) No 1321/2014](#), on continuing airworthiness, as a maintenance task, and therefore exempted from compliance with [Commission Delegated Regulation \(EU\) 2025/20](#). Oil handling is performed by personnel of a maintenance organisation approved under Regulation (EU) No 1321/2014 or compliant with ICAO Annex 8 *Maintenance of Aircraft*, when it is performed on third-country registered aircraft by organisations that are not subject to Regulation (EU) No 1321/2014. This task may also be performed by the flight crew for those aircraft for which oil handling is mentioned in the aircraft flight manual, as part of the pre-flight inspection as indicated in AMC M.A.301(a), paragraphs 2 and 3, to the abovementioned Regulation.
- (b) Aircraft may be replenished with oil either by aircraft operator personnel or by a contracted third-party provider that holds approval in accordance with the requirements mentioned above.

Article 3 — Definitions

Regulation (EU) 2025/20

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

- (1) 'ground handling organisation' means one of the following:
 - (a) a stand-alone ground handling organisation or a ground handling organisation that is part of a single ground handling organisation business grouping;
 - (b) an aerodrome operator providing ground handling services;
 - (c) an aircraft operator providing ground handling services to itself or within a single air carrier business grouping (self-handling);
- (2) 'single ground handling organisation business grouping' means two or more ground handling organisations providing services in more than one Member State and are registered in 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, including 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 ground handling personnel, operational procedures, and maintenance programme for ground support equipment;
- (3) 'passenger handling' means activities related to any kind of assistance to arriving, departing, transfer or transit passengers, including, where applicable, passenger and baggage acceptance, travel documents and flight tickets check, boarding pass issuance, gate activities, passenger boarding and disembarkation;
- (4) 'ground support equipment (GSE)' means a motorised or non-motorised mobile vehicle, apparatus or piece of equipment that is designed, built and used for the provision of ground handling services on the movement area of an aerodrome;
- (5) 'baggage handling' means a process consisting of several steps covering baggage sorting, baggage build, baggage transportation from the sorting area to the aircraft and vice versa, gate delivery baggage, baggage arrival, mishandled baggage, baggage reconciliation;
- (6) 'into-plane fuelling service' means delivery of fuel to an aircraft;
- (7) 'aircraft de-icing' means a ground 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;
- (8) 'aircraft anti-icing', means a ground procedure that provides protection against the formation of frost or ice and accumulation of snow or slush on treated surfaces of the aircraft for a limited period of time (holdover time);
- (9) 'aircraft turnaround' means a coordinated process of activities associated with the handling of an aircraft, its passengers, baggage, mail and cargo, occurring in a predetermined time interval between the aircraft arrival and its departure;
- (10) 'aircraft loading' means stowing load or unit load devices (ULDs) on board the aircraft in accordance with the loading instructions;
- (11) 'baggage' means the personal property or other articles of a passenger or crew member carried on a flight;

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- (12) ‘cargo’ or ‘freight’ means goods or property that are carried on an aircraft, other than baggage, mail, company material, company mail, and in-flight supplies, which are not consumed or used during flight;
- (13) ‘mail’ means dispatches of correspondence and other items, other than the aircraft operator’s mail, tendered by and intended for delivery to postal services in accordance with the rules of the Universal Postal Union (UPU);
- (14) ‘aircraft towing’ means the forward movement of an aircraft in service or out of service by using external power of ground support equipment that supports the aircraft’s nose landing gear or is attached to it;
- (15) ‘aircraft pushback’ means the movement of an aircraft from a nose-in parking position by using external power of ground support equipment. The operation may involve a towbar;
- (16) ‘unit load device (ULD)’ means a device for grouping and restraining cargo, mail and baggage for air transport that is either an aircraft container or a combination of an aircraft pallet and an aircraft pallet net, which is designed to be directly restrained by the aircraft cargo loading system (CLS);
- (17) ‘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;
- (18) ‘organisation providing ground handling services in more than one Member State’ means a ground handling 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 ground handling organisation business grouping or of a single air carrier business grouping;
- (19) ‘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;
- (20) ‘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; whereas an inspection may be part of an audit, but may also be conducted outside the normal audit plan, in particular, to verify the closure of a certain finding;
- (21) ‘dangerous goods (DG)’ means articles or substances which are capable of posing a hazard 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;
- (22) ‘ICAO Technical Instructions’ means ICAO Doc 9284 ‘Technical Instructions for the Safe Transport of Dangerous Goods by Air’;
- (23) ‘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;
- (24) ‘just culture’ means just culture as defined in Article 2, point 12, of [Regulation \(EU\) No 376/2014](#) of the European Parliament and of the Council¹;

¹ Regulation (EU) No 376/2014 of the European Parliament and of the Council of 3 April 2014 on the reporting, analysis and follow-up of occurrences in civil aviation, amending Regulation (EU) No 996/2010 of the European Parliament and of the Council and repealing Directive 2003/42/EC of the European Parliament and of the Council and Commission Regulations (EC) No 1321/2007 and (EC) No 1330/2007 ([OJ L 122, 24.4.2014](#), p. 18, ELI: <http://data.europa.eu/eli/reg/2014/376/oj>).

- (25) 'aircraft handling' means all the ground handling activities and communications occurring on the movement area, including aircraft refuelling and defuelling, 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;
- (26) 'passenger boarding bridge' means a telescopic corridor that extends from an airport terminal to an aircraft for the passenger boarding and disembarkation;
- (27) 'turnaround coordination' means a ground handling function with a safety role, which coordinates the ramp handling activities and ends with the release (dispatch) of a flight upon the completion of the ground handling services to the aircraft on the apron;
- (28) 'cargo compartment' means the area of an aircraft that may be used for the transport of cargo, and/or baggage;
- (29) 'equipment restraint area (ERA)' means a safety buffer area around the aircraft, which shall remain free from obstruction and foreign object debris before and after aircraft arrival and departure and during aircraft manoeuvring to and from the parking stand, except for the ground support equipment and personnel required for manoeuvring;
- (30) 'loading instructions' means a set of instructions supporting the person supervising the aircraft loading in ensuring the correct and safe loading of the aircraft;
- (31) 'mass and balance documentation' means documents containing data about the aircraft mass and balance, centre of gravity, aircraft load, notification to captain (NOTOC) for dangerous goods, loading instructions, load information.

GM1 Article 3 Definitions

ED Decision 2025/007/R

TERMS USED IN THE ACCEPTABLE MEANS OF COMPLIANCE AND GUIDANCE MATERIAL

For the purpose of the AMC and GM to [Regulation \(EU\) 2025/20](#), the following definitions apply:

Cabin baggage	Baggage in the custody of a passenger or crew member that is intended for carriage in the cabin of an aircraft; equivalent terms are 'carry-on baggage', 'hand baggage' and 'unchecked baggage'.
Checked baggage	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; this includes cabin baggage that has been taken from a passenger and loaded into the cargo compartment (e.g. due to physical size/weight restrictions or lack of cabin stowage space); equivalent terms are 'hold baggage', 'hold luggage' and 'registered baggage'.
Company material	Aircraft operator material carried on an operator's aircraft for the operator's own purposes.
Correction	The action of eliminating a non-compliance.
Corrective action	The action of eliminating or mitigating the root cause(s) and preventing 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 recurrence.
Ground handling service provider (GHSP)	Synonym for 'ground handling (GH) organisation'. The two terms are interchangeable.

Holdover time	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 precipitation, OAT, wind, the particular fluid (or fluid type) and aircraft design and aircraft configuration during the treatment.
Mass and balance documentation	In addition to the definition in Article 3 (definition (31)): Since aircraft operators may use different names for the various documents containing mass and balance calculations and data, the more generic term ‘mass and balance documentation’ is used throughout Commission Delegated Regulation (EU) 2025/20 . This ensures alignment with Regulation (EU) No 965/2012 regarding mass and balance calculations and related documentation.
Mishandled baggage	Baggage involuntarily, or inadvertently, separated from passengers or crew.
Near miss	An event in which an occurrence to be mandatorily reported in accordance with Regulation (EU) No 376/2014 was narrowly averted or avoided.
Overpack	An enclosure used by a single shipper to contain one or more packages and to form one handling unit for convenience of handling and stowage.
Oversight planning cycle	The time frame within which the content of the declaration of a GH organisation and the processes that are identified through a safety risk assessment should be reviewed by the competent authority by means of audits and inspections.
Oversight programme	The detailed oversight schedule that sets out the number of audits and other activities — including the scope and duration of each activity and the details of product audits and locations, as appropriate — to be performed by the competent authority, with a tentative time frame for performing each activity.
Package	The complete product of a packing operation, consisting of the packaging and its contents prepared for transport.
Packaging	Receptacles and any other components or materials necessary for the receptacles to perform their containment function.
Preventive action	The action taken to eliminate the cause of potential non-compliance or of any other undesirable potential situation.
Station	An aerodrome where a GH organisation provides services.
Unaccompanied baggage	Baggage that is transported as cargo and that may or may not be carried on the same aircraft as the person to whom it belongs.

GM1 Article 3(1) Definitions

ED Decision 2025/007/R

GROUND HANDLING ORGANISATION

- (a) GH services may be provided by different types of organisations. When the terms ‘organisation providing GH services’, ‘ground handling service provider’ (GHSP) or ‘GH organisation’ are used in [Commission Delegated Regulation \(EU\) 2025/20](#) and the associated AMC and GM, they are understood to cover all organisations identified in [Article 3](#), definition (1) unless it is clearly specified otherwise in the Regulation.
- (b) A provider of GH services that is contracted by another GH organisation to provide any GH service listed in [Article 2\(2\)](#) is considered a GH organisation and therefore subject to Commission Delegated Regulation (EU) 2025/20.
- (c) A freight forwarder is not considered a GHSP. Freight forwarding is not included in the definition of GH services in [Regulation \(EU\) 2018/1139](#). If a freight forwarder provides a GH service listed in [Article 2\(2\)](#) of Commission Delegated Regulation (EU) 2025/20, the requirements for contracted activities will apply, either under [Regulation \(EU\) No 965/2012](#) (point ORO.GEN.205), when its services are contracted directly by an aircraft operator, or under

Commission Delegated Regulation (EU) 2025/20 (point [ORGH.MGM.205](#)), when its services are contracted directly by a GH organisation.

GM1 Article 3(1b) Definitions

ED Decision 2025/007/R

AERODROME OPERATOR PROVIDING FACILITIES AND INFRASTRUCTURE OUTSIDE THE SCOPE OF COMMISSION DELEGATED REGULATION (EU) 2025/20

- (a) An aerodrome operator may provide certain centralised infrastructure or equipment for the provision of GH services, such as centralised baggage sorting infrastructure, de-icing facilities and PBBs.
- (b) When the aerodrome operator provides such equipment or facilities but its personnel are not involved in their operation, that aerodrome operator does not fall within the scope of [Commission Delegated Regulation \(EU\) 2025/20](#). The aerodrome operator providing training on the operation of the facilities and infrastructure provided to the GH organisations is not considered a GH organisation and is not required to declare itself as such in accordance with the Regulation.
- (c) When the aerodrome operator's own personnel are also involved in the operation of the facilities or infrastructure, that operator is considered a GH organisation and shall comply with Commission Delegated Regulation (EU) 2025/20.

GM1 Article 3(1c) Definitions

ED Decision 2025/007/R

AIRCRAFT OPERATOR 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 air carrier business grouping unless specified otherwise.
- (b) A self-handling 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 paragraph 1(a) of [Article 2](#) of [Commission Delegated Regulation \(EU\) 2025/20](#). In such a case, the Regulation is fully applicable to such an organisation.

SINGLE AIR CARRIER BUSINESS GROUPING

- (c) A **single air carrier business grouping** refers to two or more air operator certificate (AOC) holders whose PPOB is in a territory to which the EU Treaties apply. Those AOC holders may or may not facilitate the harmonisation of their management systems and operations for the purpose of applying the requirements for self-handling in a harmonised way. The management systems and operations include policies, processes and procedures for GH, training of personnel performing GH activities, ground operations procedures, and the maintenance programme for GSE.
- (d) This concept is used in Commission Delegated Regulation (EU) 2025/20 for situations where an aircraft operator provides GH services not only to itself through self-handling but also to other aircraft operators that are part of the same business grouping. The application of this concept serves several purposes:
 - (1) to avoid the duplication of GH requirements;

- (2) to enable AOC holders performing self-handling, including providing GH services to aircraft operators that are part of the same business grouping, to identify the competent authority to which they should submit a declaration; and
- (3) to enable effective and efficient oversight, including cooperative oversight.

GM1 Article 3(2) Definitions

ED Decision 2025/007/R

SINGLE GROUND HANDLING ORGANISATION BUSINESS GROUPING

The concept of single GH organisation business groupings is used in [Commission Delegated Regulation \(EU\) 2025/20](#) for situations where a GH organisation has several branches that are registered in more than one Member State but belong to the same parent company. In such cases, it is necessary to establish that such organisations should be regarded as part of a single business grouping and should have a single PPOB — the one where the parent company is located. The application of this concept serves several purposes:

- (a) to avoid the duplication of GH requirements for the same organisation;
- (b) to avoid multiple oversight audits and inspections with the same scope — the organisation's management system — and to enable effective and efficient cooperative oversight; and
- (c) to enable GH organisations to identify to which competent authority they should submit a declaration.

GM1 Article 3(7)&(8) Definitions

ED Decision 2025/007/R

AIRCRAFT GROUND DE-ICING AND ANTI ICING

ICAO Doc 9640 provides the following definitions for the terms 'anti-icing', 'de-icing' and 'de-icing/anti-icing'.

- (a) 'Anti-icing' is a precautionary procedure by which clean aircraft surfaces are protected against the formation of ice and frost and the accumulation of snow and slush for a limited period.
- (b) 'De-icing' is the process that removes ice, snow, slush or frost from aircraft surfaces.
- (c) 'De-icing/anti-icing' is a procedure combining both the de-icing process and the anti-icing process and that can be performed in one or two steps.
 - (1) 'One-step de-icing/anti-icing'. Heated anti-icing fluid is used to de-ice the aircraft and remains on the surfaces to which it is applied to provide anti-icing capability.
 - (2) 'Two-step de-icing/anti-icing'. This procedure contains two distinct steps: the first step, de-icing, is followed by the second step, anti-icing, as a separate fluid application.

GM1 Article 3(14) Definitions

ED Decision 2025/007/R

AIRCRAFT TOWING

- (a) Towing can be done using a towbar or a towbarless tractor. The GSE may be attached to the main landing gear. Depending on the type of towing vehicle, the operation may involve direct steering from the flight crew compartment by authorised personnel who are in the flight crew compartment at the time of taxiing.

- (b) Aircraft towing may have different purposes:
- (1) Aircraft maintenance. This operation is performed with no passengers or cargo and with minimum fuel on board the aircraft. This falls outside the scope of [Commission Delegated Regulation \(EU\) 2025/20](#), as stated in [Article 2\(3\)\(g\)](#).
 - (2) Operational/dispatch. This is towing of an aircraft to/from the terminal gate or parking area to/from a remote parking area, with or without passengers, cargo or fuel on board.

GM1 Article 3(15) Definitions

ED Decision 2025/007/R

AIRCRAFT PUSHBACK

- (a) 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.
- (b) Main-gear-controlled pushback involves using a vehicle that grasps the aircraft's main-gear tyres to provide rearward movement, while directional control is provided from the flight deck using the nose-wheel steering system.

Article 4 — Conditions and procedures for organisations providing ground handling services

Regulation (EU) 2025/20

The conditions and procedures for organisations providing ground handling services to declare their capability and the availability to them of the means, to discharge the responsibilities for the safe provision of services as referred to in Article 37(2) of [Regulation \(EU\) 2018/1139](#), shall be as set out in [Annexes I](#) and [II](#) to this Regulation.

Article 5 — Transitional provisions

Regulation (EU) 2025/20

Organisations already providing ground handling services on 27 March 2025 shall submit a declaration in accordance with point [ORGH.DEC.100](#) of Annex I to this Regulation from 27 March 2028 – 1 year = 27 March 2027, in accordance with a plan established and agreed with their competent authority as identified in point [ORGH.GEN.105](#) of Annex I to this Regulation.

Article 6 — Entry into force and application

Regulation (EU) 2025/20

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 27 March 2028.
3. However, point [ORGH.MGM.201](#) of Annex I to this Regulation shall apply from 27 March 2031.

Signature

Regulation (EU) 2025/20

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

Done at Brussels, 19 December 2024.

For the Commission

The President

Ursula VON DER LEYEN

ANNEX I — PART-ORGH

RESPONSIBILITIES OF GROUND HANDLING ORGANISATIONS REGARDING THE SAFE PROVISION OF SERVICES AND CONDITIONS AND PROCEDURES FOR THE DECLARATION

SUBPART GEN — GENERAL REQUIREMENTS

ORGH.GEN.100 Scope

Regulation (EU) 2025/20

This Annex establishes requirements on the following:

- (a) responsibilities of the organisations listed in [Article 3](#) definition (1) of this Regulation, which provide ground handling services at one or more aerodromes within the scope of [Regulation \(EU\) 2018/1139](#);
- (b) conditions and procedures for the declaration by those organisations.

ORGH.GEN.105 Competent authority

Regulation (EU) 2025/20

- (a) The competent authority responsible for receiving declarations from an organisation providing ground handling services at an aerodrome within the scope of [Regulation \(EU\) 2018/1139](#) shall be the authority designated by the Member State where the aerodrome is located.
- (b) 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 submit a declaration to the competent authority designated by the Member State where the organisation's principal place of business is located.
- (c) The principal place of business of a single ground handling organisation business grouping referred to in point (b) shall be determined based on all of the following criteria:
 - (1) it is the place 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, exercises their role;
 - (3) it is the effective and actual centre of control from where business development and continuity, strategy, and planning activities affecting the single ground handling organisation business grouping are managed on a regular basis.

GM1 ORGH.GEN.105(a) Competent authority

ED Decision 2025/007/R

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

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

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

GM1 ORGH.GEN.105(c) Competent authority

ED Decision 2025/007/R

GH ORGANISATIONS' PRINCIPAL PLACE OF BUSINESS

- (a) For GH organisations providing services in more than one Member State and GH organisations that are part of a single GH organisation business grouping, which have a PPoB in a territory to which the Treaties apply, the entry point for all the information related to their declarations and GH activities at all EU aerodromes within the scope of [Commission Delegated Regulation \(EU\) 2025/20](#) is considered to be the competent authority of the Member State where the PPoB is located.
- (b) The following criteria are used to identify an organisation's PPoB:
 - (1) All financial operations and decisions affecting an organisation as a whole, including the operational aspects, enabling the organisation not only to receive funds and profits and reward shareholders, but also to fulfil its obligations and make due payments. These obligations and payments range from costs associated with personnel and facilities to those related to compliance with contractual, tax or any other financial obligations; the payment of dividends, salaries, employment benefits and investment decisions. These financial management functions require planning and management of the funds of the organisation, which cannot be artificially dissociated from the operations of that organisation. These functions are therefore essential to running a business and are a strong indicator of where its headquarters is and where its management takes place, and to which system of law it has the closest link.
 - (2) The principal control of an organisation's operational activities entails managing operational decisions of the organisation on a regular basis. A place from where the supply of services is monitored and managed is indicative of the organisation's place from which it controls the operations.
 - (3) The organisation's accountable manager is ultimately accountable for safety. The accountable manager is responsible for ensuring that all activities can be financed and carried out in accordance with the applicable requirements and that the organisation is adequately structured and staffed with suitably qualified personnel. With the ultimate responsibility for safety and compliance vis-à-vis the competent authority, it is recommended that the accountable manager either reside permanently in the country where the PPoB is or demonstrate to the satisfaction of the competent authority that there are suitable means in place to discharge their responsibilities in full while not residing at the PPoB.

- (4) The organisation's key personnel (persons accountable for operations, safety, compliance monitoring, training, etc.) controlling and coordinating daily operational activities that ultimately lead to meeting the safety objectives of the EU aviation safety *acquis*.
 - (5) The head office is the place where all decision-making that affects the development of the entire corporate administration and coordination of the necessary actions takes place on a daily or regular basis.
 - (6) The records regarding the operational and financial decisions affecting the direction, control, planning, coordination and corporate financing of the organisation's activities and operations, within the scope of the applicable regulations, are always tangible and potentially subject to physical inspection and/or assessment by the competent authority.
- (c) The PPOB for aircraft operators performing self-handling is determined in accordance with [Regulation \(EU\) No 965/2012](#).

ORGH.GEN.110 Responsibilities of the ground handling organisation

Regulation (EU) 2025/20

- (a) The ground handling organisation shall be responsible for the safe provision of services in accordance with all the following:
- (1) [Regulation \(EU\) 2018/1139](#) and its delegated and implementing acts;
 - (2) its declaration submitted pursuant to Article 37(2) of Regulation (EU) 2018/1139;
 - (3) the procedures for local operation contained in the aerodrome manual, as referred to in point 4.1(b) of Annex VII to Regulation (EU) 2018/1139, which are applicable to it as aerodrome user;
 - (4) the operational procedures and instructions of the aircraft operator related to ground handling services, when provided or, when not provided, in accordance with the ground handling organisation's operational procedures.
- (b) The ground handling organisation shall establish a ground handling manual in accordance with point [ORGH.DOC.110](#) and shall operate in accordance with it.
- (c) The ground handling organisation shall establish standards and objectives for the safe performance of ground handling activities and develop operational procedures to achieve them. It shall also define the functions necessary to perform those activities, including the associated decision-making, authority, tasks and responsibilities of those functions.
- (d) The ground handling organisation shall ensure that all personnel involved in ground handling activities:
- (1) are properly trained and have demonstrated their competence to perform the assigned tasks before being allowed to exercise their duties unsupervised, and that they maintain their competence;
 - (2) are aware of their responsibilities and understand their role and how their duties are related to the safety of aerodrome and air transport operations.
- (e) When using any ground support equipment (GSE) to perform ground handling activities, the ground handling organisation shall establish and implement a maintenance programme for its GSE.

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

ED Decision 2025/007/R

COMPLIANCE WITH APPLICABLE REQUIREMENTS

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

ORGH.GEN.115 Start of operation

Regulation (EU) 2025/20

A ground handling organisation may start operating at an aerodrome when it fulfils both the following conditions:

- (a) formal arrangements with that aerodrome operator have been established;
- (b) the ground handling organisation has declared its activity to the competent authority using the form set out in [Appendix 1](#).

GM1 ORGH.GEN.115 Start of operation

ED Decision 2025/007/R

PREPARATIVE STEPS

- (a) The intention of point [ORGH.GEN.115](#) is to set out the right order of these steps, to minimise the efforts required from the GH organisation to start operating at an aerodrome that restricts access in accordance with [Council Directive 96/67/EC](#) (the GH Directive).
- (b) Examples of formal arrangements with the aerodrome operator may include, subject to the aerodrome's operational context, any of the following topics:
 - (1) prerequisite compliance with any EU legislative acts regulating aerodrome market access, when they apply to the GH organisation;
 - (2) operational procedures of the GH organisation that may have an impact on the operation of the aerodrome;
 - (3) aspects of the access of the GH organisation's employees and/or vehicles to the airside area;
 - (4) driving in the airside area;
 - (5) any training required for compliance with the aerodrome requirements or for use of aerodrome facilities.
- (c) When a GH organisation intends to provide services at aerodromes where the GH Directive applies, it is recommended that the organisation start preparing for compliance with [Commission Delegated Regulation \(EU\) 2025/20](#) and the applicable provisions referred to in the

declaration even before the completion of formalities to receive the authorisation to operate at an aerodrome where the GH Directive applies.

ORGH.GEN.120 Means of compliance

Regulation (EU) 2025/20

- (a) The ground handling organisation may use alternative means of compliance (AltMoC) 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 ground handling organisation uses AltMoC, it shall provide the competent authority with the list of those AltMoC and shall make them available to the competent authority in due time for oversight purposes.
- (c) If an organisation providing ground handling services in more than one Member State and having its principal place of business in a Member State applies an AltMoC only to aerodromes in one Member State, the organisation shall inform only the competent authority of that Member State. If such an organisation applies AltMoC to all its stations in the Member States, it shall inform the competent authority designated by the Member State where its principal place of business is located.

AMC1 ORGH.GEN.120 Means of compliance

ED Decision 2025/007/R

DEMONSTRATION OF COMPLIANCE

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

AMC2 ORGH.GEN.120 Means of compliance

ED Decision 2025/007/R

INFORMATION AND COORDINATION

- (a) The GH organisation should inform the aircraft operators or aerodrome operators concerned if its AltMoC have an impact on the procedures or instructions applicable to the provision of GH services under the current requirements.
- (b) The GH organisation should also coordinate with the organisation affected by those AltMoC and agree with them on any necessary measures to ensure that those AltMoC have no unintended consequence on the activities of the other organisation.
- (c) If an AltMoC is applicable only at certain stations, those stations should be mentioned in the relevant AltMoC.

GM1 ORGH.GEN.120 Means of compliance

ED Decision 2025/007/R

SUBMISSION OF INFORMATION TO THE COMPETENT AUTHORITY AND SAFETY RISK ASSESSMENT

- (a) The GH organisation submits its list of AltMoC to the competent authority, as identified in point [ORGH.GEN.105](#).
- (b) It is recommended that the GH organisation conduct the safety risk assessment of the AltMoC used at the head-office level, so that the assessment is valid and applicable to all stations. This is intended to avoid inconsistencies between the stations where the GH organisation provides services.

ORGH.GEN.125 Use of industry standards

Regulation (EU) 2025/20

In order to discharge their responsibilities regarding the safe provision of ground handling services, the ground handling organisation may use its own operational procedures or industry standards or both.

AMC1 ORGH.GEN.125 Use of industry standards

ED Decision 2025/007/R

USE OF INDUSTRY STANDARDS AND GOOD PRACTICES

- (a) For the purpose of the [Commission Delegated Regulation \(EU\) 2025/20](#), industry standards and good practices are documented technical or operational instructions, procedures or specifications applied on a wide scale in the GH industry that establish norms, principles and criteria to standardise various aspects of GH operations, processes, products or equipment.
- (b) The GH organisation may apply one or more industry standards and good practices on a voluntary basis to comply with the implementing rules. The industry standard may cover any of the following elements:
 - (1) management of a GH organisation, including its SMS, documentation system, compliance monitoring function, contracted services and emergency response plan (ERP);
 - (2) standard operational procedures for the provision of GH services and any physical or virtual tools, equipment, applications or programmes used;
 - (3) training for the GH functions;
 - (4) technical and/or safety specifications for products and equipment used to provide GH services.
- (c) The organisation should ensure that the industry standards and good practices that it uses to comply with Commission Delegated Regulation (EU) 2025/20 meet the criteria for safety and quality of [AMC2 ORGH.GEN.125](#).
- (d) The GH organisation should document deviations from the applicable industry standards that affect safety of operation. Where deemed relevant, the organisation should conduct a safety risk assessment for those deviations.

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

- (e) When the GH organisation uses industry standards and good practices to comply with Commission Delegated Regulation (EU) 2025/20, the internal compliance monitoring checks

should include a random verification of the correct application of those industry standards and good practices.

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

- (f) The GH organisation should comply with point [ORGH.MGM.205](#) for contracted services when a third-party industry auditor verifies the organisation's conformity with industry standards and good practices. The GH organisation should also ensure that there is no conflict of interest of the third-party auditors with the audited organisation.
- (g) The GH organisation should remain aware that conformity with the industry standards and good practices demonstrated through third-party industry audits does not automatically presume compliance with the implementing rules.

AMC2 ORGH.GEN.125 Use of industry standards

ED Decision 2025/007/R

OBJECTIVE CRITERIA FOR INDUSTRY STANDARDS

- (a) The industry standards used to demonstrate compliance with [Commission Delegated Regulation \(EU\) 2025/20](#), including those that are subject to the evaluation referred to in point [ARGH.OVS.310](#) of [Commission Implementing Regulation \(EU\) 2025/23](#), should meet the following criteria as a minimum:
 - (1) they are developed, maintained and endorsed with the participation of experts from relevant industry stakeholders;
 - (2) they address the scope of [Annex I](#) and/or [II](#) to Commission Delegated Regulation (EU) 2025/20, as applicable, with sufficient details to enable implementation of the related implementing rules;
 - (3) they are based on experience in the field and have proven themselves through testing;
 - (4) they are supported by scientific and/or technical data and documentation, safety tests and safety impact assessments, as applicable;
 - (5) they include technical, operational and, if applicable, human factors specifications for their safe implementation;
 - (6) they clearly identify the responsibilities of the persons involved in their application;
 - (7) they contain procedures for continuing review and improvement, to include lessons learned from daily operations and consider relevant innovations in the field.

RELEVANT INDUSTRY STAKEHOLDERS

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

GM1 ORGH.GEN.125 Use of industry standards

ED Decision 2025/007/R

INDUSTRY STANDARDS AND GOOD PRACTICES IN THE SCOPE

- (a) Industry standards and good practices refer to several documents developed by industry and used by organisations for the provision of GH services, which may be used to implement the requirements of [Commission Delegated Regulation \(EU\) 2025/20](#).
- (b) Examples of industry standards and good practices adopted by industry are as follows:
 - (1) IATA Ground Operations Manual (IGOM),
 - (2) IATA Airport Handling Manual (AHM),
 - (3) IATA Cargo Handling Manual (ICHM),
 - (4) IATA Dangerous Goods Regulations (DGR),
 - (5) IATA Live Animals Regulations (LAR),
 - (6) IATA Perishable Cargo Regulations (PCR),
 - (7) IATA ULD Regulations (ULDR),
 - (8) JIG standards related to fuelling,
 - (9) SAE standards related to aircraft ground de-icing and anti-icing,
 - (10) EN standards for GSE (EN 12312-1 to 12312-20 and EN 1915-1 to 1915-4),
 - (11) IBAC International Standard for Business Aircraft Handlers regarding GH (IS-BAH) for business aviation operations.

ORGH.GEN.130 Management of changes

Regulation (EU) 2025/20

- (a) The ground handling organisation shall develop, implement and maintain a process as part of its management system to manage changes to its established processes, procedures and services. If the changes directly affect its capability to safely provide ground handling services, it shall ensure the following:
 - (1) assess the safety risks of the expected changes, and implement mitigating measures to address those risks;
 - (2) determine whether and how the changes affect its interfaces with other organisations and, if necessary, involve those organisations in the safety risk assessment and risk mitigation and align those mitigating measures to avoid contradictions or deterioration of safety;
 - (3) communicate the changes and mitigating measures to the organisations affected by them;
 - (4) document the process.
- (b) If the changes affect its declaration, the ground handling organisation shall update the declaration and submit it to the competent authority without undue delay.
- (c) Notwithstanding points (a) and (b), the assessment of risks arising from any planned changes and the related documentation shall be proportionate to the size and complexity of the ground handling organisation.

- (d) Notwithstanding points (a), (b) and (c), aircraft operators performing self-handling and aerodrome operators providing ground handling services may apply their already existing process for the management of changes to manage the changes related to the provision of ground handling services.
- (e) The ground handling organisation shall provide the competent authority with the relevant documentation covering point (a) in due time for an audit or inspection.

GM1 ORGH.GEN.130 Management of changes

ED Decision 2025/007/R

ASSESSMENT OF CHANGES

- (a) Changes may affect the safety performance of a GH organisation and may result in the inadvertent introduction of new hazards that could expose the organisation to new or increased risks if they are not properly managed.
- (b) Examples of major changes affecting operations, organisations and personnel:
 - (1) provision of new GH services;
 - (2) new types of equipment, including GSE, or equipment based on new technologies;
 - (3) new types of aircraft for which GH services will be provided;
 - (4) new stations or schedules;
 - (5) new training methods or training providers;
 - (6) new AltMoC;
 - (7) new or significantly amended regulations, industry standards, good practices or operational procedures, if these have not already undergone a safety risk assessment;
 - (8) changes in security arrangements;
 - (9) changes to organisational structure (change of ownership, mergers);
 - (10) significant changes in personnel affecting key personnel and/or large numbers of personnel (e.g. high volume of newly hired personnel, high staff turnover, insufficient personnel);
 - (11) transfer of GH services between service providers or between a GH organisation and an aerodrome operator (e.g. PRM handling, operation of PBBs);
 - (12) changes in the economic situation of an organisation (e.g. commercial or financial).
- (c) Effective management of change starts by identifying the scope of the change (why it is necessary, its range, its objective), the magnitude of the change, its safety criticality and its potential impact on human performance. Then, the GH organisation follows the same steps as for a safety risk assessment (hazard identification, risk assessment, risk mitigation). The assessment should be supported by the following data and information obtained through:
 - (1) conduct of safety cases, safety risk assessments focused on aviation safety. A safety case is a structured argument, supported by evidence, intended to justify that a system is acceptably safe for a specific application in a specific operating environment;
 - (2) the involvement of key stakeholders in the change management process as appropriate;
 - (3) the review of previous safety risk assessments, existing hazards and mitigation measures applied; where present;

- (4) transparent communication on the implementation plan and progress against the plan.
- (d) The assessment of changes is normally initiated by the team that proposes and/or implements them. However, a change can only be successfully implemented if all the personnel affected by the change participate in the process.
- (e) The management of change is effective if it is meaningful to the GH organisation and adjusted to its size and complexity.
- (f) It is recommended that the process be reviewed upon closure, to identify gaps and lessons learned for future assessments.

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

ED Decision 2025/007/R

CHANGES NOT AFFECTING THE DECLARATION

- (a) The intention of point [ORGH.GEN.130\(b\)](#) is to also cover changes that are not directly reflected in the declaration but could influence the discharge of the responsibility for the provision of GH services as declared. Such changes — for example, a change to the organisation's financial structure or human resource procedures, may have an indirect effect on the organisation's management system, but they do not have to be reported to the competent authority. That is why it is important that they are managed appropriately.
- (b) GH organisations are not expected to inform the competent authority every time they change their documentation. For example, changes such as amendments to their GH manuals or procedures they follow, or updates to their training programmes, station representatives or GSE maintenance programmes, do not need to be reported to the competent authority.
- (c) A GH organisation only needs to ensure that the competent authority has the latest version of its documentation, including the items mentioned above, in due time before an inspection or audit.

ORGH.GEN.140 Access

Regulation (EU) 2025/20

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

- (a) are granted access to any facility, document, records, data, procedures or any other material relevant to the activity of the organisation;
- (b) are allowed to perform or witness any action, inspection, test, assessment or exercise that the competent authority finds necessary.

ORGH.GEN.145 Provision of documentation for oversight purposes

Regulation (EU) 2025/20

The ground handling organisation shall submit the following documents in their latest version to the competent authority as identified in point [ORGH.GEN.105](#), preferably in an electronic format, within a time frame commonly agreed with the competent authority and in due time before an oversight audit or inspection:

- (a) if applicable, a list of the AltMoC used for the ground handling activities;

- (b) the organisation's ground handling manual;
- (c) any other documents requested by the competent authority in preparation of an audit or inspection.

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

ED Decision 2025/007/R

SUBMITTING THE GH MANUAL FOR OVERSIGHT PURPOSES

If the organisation providing GH services is an aerodrome operator or a self-handling aircraft operator that already has an aerodrome manual or an operations manual that contains GH elements, it is expected to submit only the parts of its manuals that show compliance with [Commission Delegated Regulation \(EU\) 2025/20](#).

ORGH.GEN.150 Findings and corrective actions

Regulation (EU) 2025/20

- (a) When the competent authority raises a finding of non-compliance, the ground handling organisation 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 that or those non-compliances;
 - (2) develop a corrective action plan that addresses the root cause(s) and the factors contributing to the non-compliance(s);
 - (3) demonstrate the implementation of the corrective action(s) to the satisfaction of the competent authority, either at the management system level or at the station level, or both, as the case may be.
- (b) In addition to point (a), in the case of an organisation providing ground handling services in more than one Member State that may or may not be part of a single business grouping, the findings raised on the operation or a component of the organisation's management system 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 ground handling organisation shall inform, without undue delay, the aerodrome operator and the aircraft operators concerned of the actions listed in point (a) and, if appropriate, coordinate such actions with them within the time period referred to in point (a).

AMC1 ORGH.GEN.150 Findings and corrective actions

ED Decision 2025/007/R

GENERAL

- (a) The corrective action plan defined by the organisation providing GH services should address the effects of the non-compliance, as well as its root cause(s) and contributing factors.

- (b) When a finding is raised at an individual station of a GH organisation providing GH services in more than one Member State (which may or may not be part of a single GH organisation business grouping), the GH organisation may decide how to implement the corrective action — either at the station level, at Member State level or at the management system level, with the aim of addressing the issue at all stations where the same finding has been raised.
- (c) In the case of level 2 findings, as referred to in point [ARGH.OVS.325](#) of [Commission Implementing Regulation \(EU\) 2025/23](#), the GH organisation should submit a root cause analysis and a corrective action plan to the competent authority within a specified period. This period should be shorter than the corrective action implementation period, in order to provide sufficient time for the competent authority to agree on the submitted corrective action plan and for the GH organisation to implement it before the end of the implementation period.

GM1 ORGH.GEN.150(a)(1) Findings and corrective actions

ED Decision 2025/007/R

ROOT CAUSE ANALYSIS

- (a) It is important that the analysis does not primarily focus on establishing who or what caused the non-compliance, but on why it happened. Establishing the root cause(s) of non-compliance often requires an overarching view of the events and circumstances that led to it, to identify all possible systemic and contributing factors (regulatory, human, organisational, technical, operational, etc.) in addition to the direct factors.
- (b) A narrow focus on single events or failures to identify the chain of events that led to the non-compliance may not properly reflect the complexity of the issue. Such an approach may not consider important factors that must be addressed to prevent recurrence. An inappropriate or partial causal analysis often leads to defining ‘quick fixes’ that only address the effects of the non-conformity. A peer review of the results of the causal analysis may increase its reliability and objectivity.
- (c) It is expected that the root cause analysis consider organisational structures, processes and their interfaces, procedures, personnel, equipment, facilities and the environment in which the organisation operates to set up effective corrective actions to preventing recurrence. Root cause analysis methods — for example, fishbone diagrams, Pareto charts, the ‘5 whys’ and failure mode and effects analysis — may be used to identify the underlying causes of problems, failures and inefficiencies.

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

Regulation (EU) 2025/20

- (a) The ground handling organisation shall implement, without undue delay, any safety measures or safety directives mandated by the competent authority as an immediate reaction to a safety problem.
- (b) The ground handling organisation shall inform, without undue delay, the aircraft operator to which it provides services and the aerodrome operators concerned of the implementation of the measures or safety directives referred to in point (a).

ORGH.GEN.160 Reporting of safety-related occurrences

Regulation (EU) 2025/20

- (a) As part of its management system referred to in point [ORGH.MGM.200](#) of this Annex, the ground handling 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) The ground handling organisation shall report:
 - (1) to the competent authority of the Member State of occurrence, as well as to any other organisation required to be informed by the Member State of occurrence, 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;
 - (2) the dangerous goods events to the appropriate authority of the Member State of occurrence.
- (c) The ground handling organisation shall also transmit the occurrence report referred to in point (b) to the aerodrome operator where the event occurred and the affected aircraft operator. If relevant, the report shall also be transmitted to the air traffic services provider and any other ground handling organisation concerned that operates at the aerodrome of the occurrence.
- (d) The occurrence reports shall:
 - (1) be transmitted to the respective authorities referred to in point (b) and to the organisations referred to in point (c) as soon as practicable, but no later than 72 hours after the ground handling organisation became aware of the occurrence, unless exceptional circumstances prevent this; and
 - (2) contain all pertinent information about the condition known to the ground handling organisation at the time of reporting.
- (e) For reports referred to in point (b), the ground handling organisation shall produce, when relevant, 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 entities referred to in points (b) and (c);
 - (2) made in a form and manner established by the competent authority referred to in point (b)(1) or, in the case of dangerous goods, by the appropriate authority referred to in point (b)(2).

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

ED Decision 2025/007/R

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

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

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

ED Decision 2025/007/R

REPORTING DANGEROUS GOODS EVENTS

- (a) The ‘appropriate authority of the Member State of occurrence’ means, for the purpose of dangerous goods reporting, the national competent authority or authorities designated or otherwise recognised by a state to perform specific functions related to the dangerous goods regulations.
- (b) In this case, the appropriate authority is the national civil aviation authority of the state of occurrence.
- (c) The dangerous goods events expected to be reported in accordance with the ICAO Technical Instructions include:
 - (1) any dangerous goods accident or incident;
 - (2) the discovery of undeclared or misdeclared dangerous goods in cargo or mail;
 - (3) the finding of dangerous goods carried by passengers or crew members, or in their baggage, when not in accordance with Part 8 of the Technical Instructions.

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

ED Decision 2025/007/R

FOLLOW-UP OF OCCURRENCES

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

- (a) the investigation of the occurrence and the conduct of an analysis to identify the root cause;
- (b) the results of the investigation;
- (c) the conclusions of an investigation into an occurrence;
- (d) the actions taken to prevent similar occurrences in the future — when relevant, those actions should be included in the SMS, with a safety risk assessment, mitigation measures and safety performance indicators;
- (e) the dissemination and promotion of the actions taken, such as, but not limited to, a change in a procedure or the GH manual, updates to the training programme, providing feedback to the reporter (when this is not anonymous), safety promotion actions and further actions with other stakeholders involved.

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

ED Decision 2025/007/R

REPORTABLE EVENTS AND FOLLOW-UP REPORTS

- (a) The list of reportable GH events can be found in Annex IV to [Commission Implementing Regulation \(EU\) 2015/1018](#), ‘Occurrences related to aerodromes and ground services’, points 1 and 2.
- (b) Not all occurrences recorded under a voluntary reporting system are reportable to the competent authority; only those that involve an actual or potential aviation safety risk

(Article 5(5) and (6) of [Regulation \(EU\) No 376/2014](#), covering voluntary reporting) are reportable to the competent authority.

- (c) It is recommended that the GH organisation liaise with the competent authority to determine what types of occurrences are considered to involve an actual or potential aviation safety risk.
- (d) The GH organisation may need to assess whether that reported occurrence is subject to mandatory or voluntary reporting and consequently apply the relevant notification obligations. Sometimes a report submitted under a voluntary reporting system may have to be reclassified by the GH organisation as a mandatory report and vice versa.
- (e) The GH organisation is encouraged to include all available relevant information in the notification of the competent authority. If appropriate, the information should include the indication that no further analysis or follow-up actions will be conducted on that occurrence ('closed on issue') or the assessment of the safety risk of that occurrence and actions taken to mitigate it.

ORGH.GEN.165 Safety reporting system

Regulation (EU) 2025/20

- (a) The reporting system referred to in point [ORGH.GEN.160](#) shall contain the necessary means and procedures to enable the ground handling organisation to improve and promote safe provision of ground handling services and a safety culture within the organisation. It shall:
 - (1) include an internal safety reporting scheme;
 - (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 point [ORGH.MGM.200\(b\)\(2\)](#);
 - (3) be used for evaluating all known, relevant information relating to errors, near misses, hazards, and the failure to follow operational procedures;
 - (4) enable sharing of any other safety relevant information with the organisations with which it has interfaces;
 - (5) provide possibilities for voluntary reporting and for reporting anonymously as part of the internal safety reporting scheme;
 - (6) protect the identity of the reporter, ensure the reporter's full confidentiality and that of any personal data or details.
- (b) The ground handling organisation shall have procedures to:
 - (1) cover internal safety reporting — mandatory and voluntary, including when the ground handling organisation uses a separate scheme for voluntary reporting;
 - (2) record all reports submitted;
 - (3) determine which events qualify for reporting under point [ORGH.GEN.160\(b\)](#);
 - (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 reported events conducted by the aerodrome operator or the aircraft operator, as appropriate, where the ground handling organisation is directly affected by the event or the proposed mitigating measures;
 - (7) take the 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 mitigating measures;
 - (9) refrain from attribution of blame in line with the 'just culture' principle.
- (c) The ground handling organisation shall make arrangements to collect safety issues related to contracted activities referred to in point [ORGH.MGM.205](#).
- (d) The safety reporting system shall be proportionate to the size and complexity of the ground handling organisation.

AMC1 ORGH.GEN.165 Safety reporting system

ED Decision 2025/007/R

CONTENT, USAGE, CHARACTERISTICS OF THE SAFETY REPORTING SYSTEM

- (a) The GH organisation's reporting system should be adequate for the size of the organisation; it should be kept simple and include details on what, how, where and when to report.
- (b) The reports should meet the requirements of point [ORGH.GEN.160](#) on occurrence reporting in terms of time, format and information to be reported. The GH organisation should provide the means of and format for reporting when this is not established by the relevant authorities under point [ORGH.GEN.160](#).
- (c) The reporting system should:
- (1) ensure confidentiality, and enable and encourage non-punitive, free and frank reporting of any potentially safety-related occurrence or risk, including incidents such as errors or near misses, safety issues and identified hazards;
 - (2) provide acknowledgement to the reporter of the successful submission of the report — for small organisations, verbal acknowledgement may be sufficient.
- (d) The reporting system, including internal safety reporting, should clearly express the purpose and objectives. The organisation should do the following.
- (1) Contain procedures to implement a just culture.
 - (2) Identify those reports that require investigation and determine whether the event reported qualifies for reporting under points (b) and (c) of point [ORGH.GEN.160](#). A small GH organisation should seek advice from its competent authority on this matter.
 - (3) Investigate the causal and contributing factors related to the occurrence, incident, error or near-miss event that was identified, including technical, organisational, managerial and human factors. The aim should be to understand what happened and how it happened and to prevent or reduce the probability and/or consequences of future recurrence. Complex organisations should analyse the collective data showing the trends and frequencies of the contributing factors.

- (4) Take the necessary corrective actions based on the results of the investigation, to address the root cause of the event and to disseminate knowledge of relevant incidents and accidents and of actions taken to the employees concerned.
 - (5) Ensure, where relevant, cooperation with the aircraft operator and the aerodrome operator on occurrence investigations by exchanging relevant information to improve ground and flight safety.
 - (6) Participate in the investigation conducted by the aerodrome operator or the aircraft operator, as appropriate, where the organisation is directly affected by the event or the proposed mitigation measures.
 - (7) Ensure that the findings of investigations feed into the relevant recurrent training while maintaining the required confidentiality.
- (e) Access to reports submitted should be restricted to personnel responsible for processing, storing and analysing them. A small GH organisation may apply a more flexible approach to this restriction, appropriate to its organisational structure.

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

ED Decision 2025/007/R

SAFETY REPORTING CULTURE — UNDERSTANDING THE RISKS OF NOT REPORTING

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

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

- (a) Key risk areas:
 - (1) damage done to the aircraft may go unnoticed by the flight crew or not be reported to them, especially for aircraft with carbon-fibre structures;
 - (2) events are not properly understood as an accurate root cause analysis is much harder to perform.
- (b) Potential consequences:
 - (1) unnoticed aircraft damage may endanger the flight;
 - (2) effective corrective actions cannot be put in place;
 - (3) damage-related costs increase.
- (c) Mitigation measures:
 - (1) include the SMS in the training programme for personnel, explaining the value of having a safety culture and a healthy, non-punitive safety reporting system;
 - (2) apply a just culture and encourage open communication at all levels, top-down and bottom-up, about safety actions, events, occurrences and mitigation, to encourage proper reporting, thus enabling damage assessment and event analysis.

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

ED Decision 2025/007/R

SHARING OF SAFETY-RELEVANT INFORMATION WITH INTERFACING ORGANISATIONS

- (a) The relevant information to be shared with the aircraft operator or aerodrome operator, or both, to improve safety in GH and the operational procedures for addressing safety interfaces includes information, data, facts and analyses from various sources, such as:
- (1) audits and inspections, their findings and associated corrective actions;
 - (2) safety reports;
 - (3) accident/incident investigations;
 - (4) safety studies and reviews from official and verified sources.
- (b) Safety-relevant information may also be communicated outside the regulatory framework of occurrence reporting as per point [ORGH.GEN.160](#), which implements the essential requirements of [Regulation \(EU\) 2018/1139](#) (Section 4.2.2 of Annex VII). For example, aerodrome safety committee meetings could be used to maintain regular communication on safety matters and share good practices, common procedures and safety information relevant to the interface procedures.

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

ED Decision 2025/007/R

SAFETY INVESTIGATION TEAM

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

- (a) GH personnel that are competent in the area or subject of the occurrence;
- (b) in the case of a complex GH organisation, a trained investigator or an individual that has received training in investigating occurrences.

ORGH.GEN.170 Psychoactive substances and medicines

Regulation (EU) 2025/20

- (a) The ground handling organisation shall implement a procedure to ensure that its personnel:
- (1) do not perform any duties under the influence of alcohol, any psychoactive substances or any medicine that may have an effect on their abilities to perform their tasks in a manner contrary to safety;
 - (2) do not consume any of those substances while on duty.
- (b) The procedure shall be included in the ground handling organisation's management system.

GM1 ORGH.GEN.170 Psychoactive substances and medicines

ED Decision 2025/007/R

ICAO GUIDANCE AND AERODROME OPERATOR PROCEDURE

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

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

SUBPART MGM — MANAGEMENT SYSTEM

ORGH.MGM.200 General requirements for the management system

Regulation (EU) 2025/20

- (a) The ground handling organisation shall develop and implement a management system proportionate to the type and complexity of activities, the size of the organisation, and the operational context, to manage the safety risks; it shall 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 ground handling organisation to discharge its responsibilities.
- (b) The management system shall include the following:
 - (1) clearly defined lines of accountability and responsibility with regard to the overall activities of the organisation throughout the organisation, including a direct safety accountability of the accountable manager;
 - (2) a safety management system that includes 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) a process to manage and improve the organisation’s safety performance by establishing safety objectives, standards, and indicators, and to validate the proportionality and effectiveness of the mitigating measures in addressing the safety risks;
 - (iv) means to promote safety within the organisation, with the purpose of fostering a safety culture, in particular, 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;
 - (v) identification of interfaces with other stakeholders, and the ground handling organisation’s own safety accountability, authority and responsibility within those interfaces;
 - (3) a process to manage changes in accordance with point [ORGH.GEN.130](#);
 - (4) methods to ensure a minimum level of control to prevent fatigue to its personnel by complying with the existing applicable requirements, also considering the different ground handling functions and the associated safety risks of the assigned tasks;
 - (5) a training programme to ensure that personnel involved in the ground handling 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 ground handling organisation with the applicable requirements and regulations under the terms of its declaration, which shall include feedback on findings to the accountable manager to ensure effective implementation of corrective actions as necessary, and continuous improvement and updates of the management system components;

- (7) a document management system.
- (c) The ground handling organisation shall document the processes of the management system referred to in points (b)(1) to (7).
- (d) Notwithstanding points (a), (b) and (c), if the ground handling organisation is part of a legal entity that holds one or more additional certificates, approvals, or authorisations or declares its activity in accordance with [Regulation \(EU\) 2018/1139](#) and its delegated and implementing acts, the ground handling organisation may integrate its management system with the management system that it has already established under the provisions applicable to that certificate, approval, authorisation or declaration, as the case may be.

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

ED Decision 2025/007/R

SMALL GH ORGANISATIONS

- (a) An organisation that has up to 25 full-time equivalent (FTE) employees is considered a small GH organisation. It may perform any of the GH activities listed in [Article 2](#) of [Commission Delegated Regulation \(EU\) 2025/20](#). It should be understood that a small organisation is considered to be non-complex, and also that the complexity refers to its organisational structure, not to the complexity of the operations it performs.
- (b) The maximum number of FTEs should be regarded as an annual average, to accommodate any seasonal or occasional fluctuations.
- (c) If the GH organisation uses more than 25 FTEs regularly or for periods longer than six consecutive months, it should no longer be considered small and should apply the AMC associated with Regulation (EU) 2025/20 or the parts thereof that are applicable to complex organisations.

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

ED Decision 2025/007/R

SCALABILITY AND SUITABILITY OF AN OPERATIONAL AND EFFECTIVE MANAGEMENT SYSTEM

- (a) All organisations, regardless of their size, are exposed to risks, some of which are potentially significant. This means that:
 - (1) all elements of a management system should apply;
 - (2) the effectiveness of the management system will depend on how appropriately its elements are designed, implemented and operated.
- (b) However, an operating management system does not need to be complicated and expensive to be effective. It could be made scalable if it keeps on delivering as expected and provides an effective way to manage all key operational risks.
- (c) Scaling a management system (including the SMS) does not mean choosing to apply only some elements of the system and not others. Scalability is about adapting the system to the specific operational context of the organisation.

- (d) The following aspects are vital for any organisation to understand the context in which its management system operates, the purpose of the management system and the key risks that it must manage effectively (the list is not exhaustive):
- (1) regarding the size of the organisation:
 - (i) number of employees, number of stations where GH services are provided, facilities, pieces of GSE utilised, internal and external interfaces and organisational structure;
 - (ii) type and variety of services provided;
 - (iii) number of aircraft operator customers and volume of serviced flights or passengers (as relevant);
 - (2) regarding the complexity of the GH activities performed and, consequently, of the risks to be managed:
 - (i) the GH organisation's hazards log, the safety risk assessment reflected in the safety risk severity and tolerability levels, safety performance indicators, the complexity of mitigation measures and controls put in place to minimise the risks of a particular GH activity;
 - (ii) the number of personnel compared to the number and complexity of tasks to complete for a particular GH activity or for all GH services provided by a GH organisation;
 - (iii) the training programme to be completed by the personnel assigned to a particular GH activity;
 - (iv) the interfaces of a particular GH activity with other GH operations or other actors contributing to its execution;
 - (v) the communication layers among the individuals and entities involved in the execution of that activity, and the hierarchical levels involved in the communication chain;
 - (vi) the use of any GSE for the execution of a particular GH activity;
 - (vii) risks associated with the operating environment (e.g. congested aerodrome, mountainous, climate, geographical location, stations near conflicts zones), safety consequences of low safety performance of services provided, potential downtime, etc.;
 - (viii) risks associated with the business model (e.g. takeovers, mergers, extent of contracted services, services based on a short turnaround or operations under commercial pressure; GH organisation as part of a single GH organisation business grouping, a stand-alone organisation, or part of an aircraft operator or aerodrome operator);
 - (ix) AltMoC granted by the competent authority;
 - (3) regarding other external and internal factors:
 - (i) societal and public expectations;
 - (ii) economic and commercial environment, competition, balance between the need to ensure stability of the business and the need for change;
 - (iii) experience in the business, adequacy and robustness of existing procedures;

- (iv) safety culture, open reporting culture, prevention culture and just culture;
 - (v) state's overall performance.
- (e) This multidimensional complexity needs proper weighing. The topics below may be used for this evaluation. More details are provided in the Annexes to [EASA's Management System Assessment Tool](#).
- (1) The safety policy may be a brief high-level statement of the commitment of management, supported by safety objectives that address significant risks; it would be more detailed in a challenging environment. The regular updating of the safety objectives is necessary where the business/operations are continually evolving (due to changing operational activities, numerous deficiencies, crises, etc.).
 - (2) It is recommended that the communication of these safety objectives be commensurate with the resources of the organisation.
 - (3) The reporting policy, just culture policy and safety objectives could be combined with the safety policy for small organisations.
 - (4) The significance of the areas of greater risk (severity, likelihood), the robustness of the mitigation measures greatly affect the efficiency of the safety barriers;
 - (5) For organisations with a lower level of risk, the safety risk assessment model that they use may be very simple if the hazards identified are easy to mitigate. In addition, the organisation will strive to classify risks in a consistent manner; expert judgement may be sufficient to measure the efficiency of the safety barriers, especially when the volume of data or safety information does not support the precise evaluation of the likelihood and the severity of the consequences of the hazards.
 - (6) Focus on risks at interfaces will significantly depend on the criticality of the contracted services and the magnitude of the supply chain. The communication of changes and communication at the interfaces will certainly be more demanding in a large organisation or in an organisation contracting many activities.
 - (7) The management system documentation, hazard log and records (of safety risk assessments, decisions, actions, ownership and monitoring) should be clear and concise but sufficiently detailed to ensure the adequate management of risks. They should be consistent and complete. However, in a small GH organisation, they should not generate 'red tape'.
 - (8) Human performance and human resources can be critical for organisations of all sizes, although the related issues may depend on organisations' context and size: small organisations will be more affected by retirement, transfer of knowledge, sickness and a stressful environment, whereas large organisations experiencing major changes or significant growth will face major challenges.
 - (9) The degree of urgency of reaching a certain level of safety based on deficiencies, feedback from the compliance monitoring system, cultural factors or changes to rapidly manage any immediate/pressing safety issue, may affect the resources required for the timely achievement of the safety objectives.
- (f) The implementation of industry standards and good practices directly relevant to a GH organisation's activities will also be considered in the design and functioning of its management system.

- (g) It is the responsibility of the GH organisation to determine the suitability and scalability of its management system and to demonstrate to its competent authority that its management system is appropriately designed and suitable to effectively deliver results as expected. An operating management system or SMS does not necessarily need to be complicated, time-consuming and expensive to be effective and demonstrate that the significant risks are under control and that the organisation is safety-data-rich and therefore able to take the right managerial decisions.
- (h) The following levels of maturity of a GH organisation's management system and experience in the implementation of an SMS are expected to be achieved and demonstrated gradually in several steps, from 'present' to 'effective'.
- (1) Present. This means that the GH organisation is able to provide evidence that the components of its management system are defined and documented within its management system documentation.
 - (2) Suitable. This means that the components of its management system are appropriate and meaningful for its GH activities, its size and the complexity of the services it provides based on the inherent risk of its activities.
 - (3) Operating. This means that the GH organisation is able to provide evidence that the components of its management system are in use and that an output is being produced.
 - (4) Effective. This means that the components of its management system achieve the desired outcome, have a positive effect on safety and strive to ensure continued improvement; the desired effect is achieved when the safety objectives are achieved.

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

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

GM1 ORGH.MGM.200(b)(1) General requirements for the management system

ED Decision 2025/007/R

ACCOUNTABILITY, RESPONSIBILITY AND SENIOR MANAGEMENT

- (a) Senior management is usually a group consisting of the persons whose functions are performed at the highest level of management in the organisation, immediately below the board of directors.
- (b) Other terms used are 'executive management', 'higher management' and 'management team'.
- (c) For the purpose of [Commission Delegated Regulation \(EU\) 2025/20](#), senior management includes the accountable manager.
- (d) The GH organisation may have a reduced senior management structure, where several functions are fulfilled by a single person.
- (e) In the English language, the notion of accountability is different from the notion of responsibility. 'Accountability' refers to an obligation that cannot be shared or delegated.

‘Responsibility’ refers to an obligation that can be delegated and shared; it means that a person is assigned specific duties or tasks to perform.

- (f) Senior management is expected to:
- (1) continually promote the safety policy to all personnel and demonstrate their commitment to it;
 - (2) provide the human and financial resources necessary for its implementation;
 - (3) establish safety objectives and performance standards;
 - (4) take overall accountability for the organisation’s outcomes and results.

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

ED Decision 2025/007/R

SAFETY MANAGEMENT SYSTEM

- (a) The GH organisation should implement and maintain an SMS that is commensurate with the safety risks of its organisation and activities performed. The SMS should establish processes and procedures covering:
- (1) safety policy and objectives:
 - (i) management commitment;
 - (ii) accountabilities and responsibilities, including for the accountable manager;
 - (iii) appointment of key safety roles and assigned personnel;
 - (iv) SMS documentation;
 - (2) safety risk management:
 - (i) hazard identification;
 - (ii) safety risk assessment and mitigation actions;
 - (3) safety assurance:
 - (i) monitoring and measurement of safety performance;
 - (ii) management of change;
 - (iii) continuing improvement of the SMS;
 - (4) safety promotion:
 - (i) training;
 - (ii) safety communication.
- (b) The capability of a GH organisation to manage safety should be proportional to the safety risks to be managed, which can be at the service level or at the organisational level.
- (c) The mitigation measures put in place should reduce the risks to an acceptable level. The effectiveness of mitigation measures should be monitored, as it may change over time.
- (d) The GH organisation should establish and apply monitoring activities, measuring tools and indicators to evaluate the organisation’s safety performance. Where the various elements of

the GH organisation's management system are included in separate programmes, procedures or manuals, they should be cross-referenced.

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

ED Decision 2025/007/R

SMS FOR SMALL GH ORGANISATIONS

- (a) Small GH organisations should develop and implement an SMS that is commensurate with the safety risks of their organisation and activities performed.
 - (1) The safety policy of these organisations should express a commitment to ensuring adherence to the safety standards required by [Commission Delegated Regulation \(EU\) 2025/20](#), improving and maintaining the safety of its activities, complying with the applicable requirements, considering best practices and providing appropriate resources for the discharge of its responsibilities as declared.
 - (2) Safety risk management may be performed using hazard checklists or similar risk management tools or processes, which are integrated into the activities of the organisation.
- (b) While the SMS framework remains the same as for complex GH organisations, the management system and resources should be scalable, and processes and procedures may be simplified and combined. For example, safety risk management may be performed using hazard checklists or similar risk management tools or processes, which are integrated into the activities of the organisation.
- (c) The GH organisation should identify a person who fulfils the role of safety manager and is responsible for coordinating the processes and tasks related to safety management. This person may be the accountable manager or a person with an operational role within the organisation, on the condition that they are qualified to perform the safety manager role.

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

ED Decision 2025/007/R

SAFETY MANAGEMENT DOCUMENTATION

- (a) A GH organisation should develop safety management documentation as the key instrument for communicating the approach to safety for the entire organisation. The safety management documentation should contain all aspects of safety management detailed in [AMC1 ORGH.MGM.200\(b\)\(2\)](#), as well as the safety reporting and investigation process and ERP.
- (b) The safety management documentation may consist of a manual (safety management manual) or a set of procedures issued as stand-alone documents or included in various manuals. The safety management documents should contain adequate cross-references to one another.
- (c) The safety management documentation of small GH organisations should reflect the size of the organisations and the complexity of their activities.
- (d) The documentation should be available to all personnel.

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

ED Decision 2025/007/R

SAFETY RISK MANAGEMENT

- (a) The scalability and suitability of the safety management system are expected to be a function of the inherent safety-risk-related capabilities of the organisation. For example, complex structures are usually exposed to complex risks, which require a robust safety risk management process. Or, for organisations facing a lower level of risk:
- (1) the safety risk assessment model may be very simple if the hazards identified are easy to mitigate;
 - (2) expert judgement may be sufficient to measure the efficiency of safety barriers;
 - (3) the collection of data, including on occurrences, and consequently the safety information may be very limited;
 - (4) there may be no need for software or tools to manage the SMS; and
 - (5) the communication policy may be limited.
- (b) The safety risk and safety risk tolerability matrices provided in ICAO Doc 9859, *Safety Management Manual*, may be used to determine the tolerability of the safety risks within the organisation. Nevertheless, the GH organisation may use other models to assess and manage the safety risk.

The ICAO safety risk matrix:

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

The ICAO safety risk tolerability matrix:

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

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

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GUIDANCE FOR SMALL GH ORGANISATIONS ON BUILDING A SCALABLE SMS

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

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

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

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

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

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

ED Decision 2025/007/R

SAFETY POLICY

- (a) The safety policy is a statement expressing the commitment of management to safety and the implementation of the SMS. It should:
- (1) be signed by the accountable manager;
 - (2) clearly identify safety as the highest organisational priority over commercial, operational, environmental or social pressures;
 - (3) reflect organisational commitments regarding safety, its proactive and systematic management and the provision of appropriate resources;
 - (4) be communicated, with visible endorsement, throughout the organisation;
 - (5) promote safety behaviours, encourage safety reporting with reference to just culture principles, indicate which types of operational behaviours are unacceptable and include the conditions under which disciplinary action would not apply;
 - (6) emphasise the responsibility of GH personnel to comply with all applicable regulations, applicable standards best practices, instructions and procedures established through its management system documentation;
 - (7) promote the continuing improvement of the management system and operational safety;

- (8) be periodically reviewed to ensure that it remains relevant and appropriate to the organisation.
- (b) Senior management should:
 - (1) continually promote the safety policy to all personnel and demonstrate their commitment to it;
 - (2) establish safety objectives and performance standards.

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

ED Decision 2025/007/R

KEY PROCESSES IN SAFETY MANAGEMENT

- (a) Hazard identification processes
 - (1) The GH organisation should implement an SMS that enables the adoption of reactive, proactive and predictive methods. A reporting scheme that is based on a combination of reactive, proactive and predictive methods of safety data collection should be the formal means of collecting, recording, analysing, acting on and generating feedback about hazards and associated risks that may affect the safety of GH services.
 - (2) Hazards identified should include:
 - (i) hazards that may be generated by human factors; and
 - (ii) hazards that may stem from the organisational set-up or the existence of complex operational arrangements (e.g. when an organisation (aircraft operator) both performs self-handling and contracts GH services to a third-party GH organisation, when a self-handling aircraft operator provides GH services to other aircraft operators within a single air carrier business grouping or when other services or products are contracted in multiple layers).
- (b) Risk management processes
 - (1) The GH organisation should implement and maintain a formal safety risk management process, to include:
 - (i) analysis of risks (e.g. in terms of likelihood and severity of the consequences of hazards and occurrences);
 - (ii) risk classification (in terms of tolerability); and
 - (iii) control (in terms of mitigation) of risks to an acceptable level.
 - (2) The levels of management personnel who have the authority to make decisions regarding the tolerability of safety risks, in accordance with point (b)(1)(ii), should be specified.
 - (3) A risk register, hazard log or equivalent system should be used.
- (c) Management of change. See the AMC and GM to point [ORGH.GEN.130](#).
- (d) Continuing improvement. The GH organisation should seek to continuously improve its safety performance and the effectiveness of its management system. There should be a focus on updating the risk register, ensuring the continued relevance of the safety performance indicators and the effectiveness of mitigation measures in managing the safety risks identified,

and monitoring the competence of personnel and their understanding of their own role in maintaining safety of GH operations.

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

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

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EMERGENCY RESPONSE PLAN

- (a) As part of its SMS, the GH organisation should develop and implement an ERP that ensures prompt, appropriate and effective responses to emergencies. It should be adjusted to the size and complexity of the organisation.
- (b) The ERP should cover the corporate and station levels. At the station level, the GH organisation should follow the ERP of the aerodrome operator and support or replace the aircraft operator.
- (c) The ERP should:
 - (1) be coordinated with the aircraft operator's ERP and with the ERP of the aerodrome operator and any other relevant stakeholder;
 - (2) provide the actions to be taken by the personnel of the GH organisation or specific individuals in an emergency;
 - (3) include clear instructions on who to contact at the aircraft operator to which the organisation provides GH services at the aerodrome(s) relevant to the emergency and how to contact them (including outside normal business hours) in accordance with the instructions received from the operator.
- (d) The GH organisation should ensure that its personnel are aware of their role in an emergency response and are trained adequately to provide the expected support.
- (e) The ERP should be tested regularly to ensure that it remains relevant and personnel's training remains current.

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

ED Decision 2025/007/R

SAFETY MANAGEMENT — RISK REGISTER FOR SMALL GH ORGANISATIONS

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

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

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

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

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

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EMERGENCY RESPONSE PLAN

- (a) It is recommended that the ERP cover any type of emergency in which the GH organisation may be involved.
- (b) An emergency response may be required even when the aircraft operator does not disseminate its ERP to the GH organisation. However, the GH organisation should consider whether it is liable for emergencies that are exclusively related to the safety of its own services and how it should respond to them as part of its business continuity plan.
- (c) The ERP at the corporate level:
 - (1) sets out how the procedures of the GH organisation are coordinated with the ERP of the aerodrome operator(s) and other entities that will respond during emergency situations;
 - (2) defines the roles and responsibilities of the GH organisation; and
 - (3) describes the procedures for notifying and/or communicating with the aircraft operator(s), the aerodrome operator(s) and other relevant entities.
- (d) At the station level, it is recommended that the GH organisation be responsible for the following actions:
 - (1) apply the aerodrome ERP, as well as the aircraft operator's station ERP;
 - (2) define and document the roles and responsibilities of the organisation at stations;
 - (3) establish a timeline of actions to be taken in response to emergency events;
 - (4) ensure that the station personnel are properly trained in relation to the organisation's ERP;
 - (5) participate as required in any emergency exercises and training run by the aircraft operator and/or aerodrome operator;
 - (6) review the own station ERP to ensure its relevance.
- (e) A small GH organisation may scale the ERP to its size. If it operates at more than one station, the corporate and station-level plans can be combined.

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

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

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HUMAN FACTORS AND SAFETY HAZARDS

- (a) Human factors can be addressed as part of a GH organisation's SMS to optimise human performance within the system. This can be achieved by analysing tasks, the individuals involved and the organisation, and how each of these can affect safety behaviour.
- (b) A task or job should be designed with ergonomic principles in mind, taking into account typical human performance limitations to ensure that workers are not overloaded and are able to carry out their tasks in all operational circumstances. The physical design of the workplace, the work environment and equipment, and the mental abilities of the person making decisions, as well as their perception of the task and risks, need to be considered.
- (c) Individuals have varying strengths and weaknesses related to their attitudes, skills and personalities.
- (d) An organisation's culture and organisational attitudes can have a considerable influence on individual and group behaviour. A positive culture promotes employee involvement and commitment at all levels and highlights where deviations from safe working practices are not acceptable.
- (e) The GH environment still relies heavily on people. However, as technical systems become more reliable, the remaining occurrences are largely related to human error.
- (f) Human factors or operator errors have been identified by industry as being responsible for over 90 % of accidents involving damage to aircraft and infrastructure. Common causes of such accidents have been highlighted as poor training and supervision, failure to follow standard operational procedures, communication failure, distraction and work pressure. As part of its SMS, it is recommended that the GH organisation identify and target root causes related to human factors and take appropriate mitigating actions.
- (g) There is a considerable amount of research and academic material on the subject of human factors. One commonly used concept is the 'dirty dozen'. This term refers to 12 of the most common conditions for human error that can act as precursors to accidents or incidents. These 12 elements lead people to make mistakes. Since the introduction of this concept in aircraft maintenance in 1993, the dirty dozen has been a useful starting point in all areas of the aviation industry for discussions of human error within businesses, organisations and workplaces.
- (h) While the dirty dozen have increased awareness of how humans can contribute to accidents and incidents, the aim of the concept is to focus attention and resources on reducing and containing human error. There are examples of typical countermeasures designed to reduce the possibility of any human error causing a problem related to each of the 12 elements. There are over 300 elements in the *Human Factors Training Manual* (ICAO Doc 9683), out of which the dirty dozen is listed below.
- (i) It is recommended that the GH organisation conduct an analysis of the human factors in their operations and organisation. Using the dirty dozen is an efficient and simple way to conduct this analysis. The 12 elements are shown in the figure below (see also Appendix G to ICAO Doc 10121, *Manual on Ground Handling*).

1. Lack of communication	2. Distraction	3. Lack of resources	4. Stress
5. Complacency	6. Lack of teamwork	7. Pressure	8. Lack of awareness
9. Lack of knowledge	10. Fatigue	11. Lack of assertiveness	12. Norms (‘the way we do things around here’)

- (j) The GH organisation should be aware of the issues when employing temporary, including from a third party, and seasonal personnel. Some examples are:
- (1) maintenance of competency through training;
 - (2) inexperienced personnel working unsupervised; and
 - (3) infrequent use of equipment and procedures.
- (k) It is recommended that the GH organisation maintain an appropriate balance between temporary workers and full-time employees within its operational teams to ensure sufficient levels of experience and competency.

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

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MONITORING SAFETY PERFORMANCE

- (a) The GH organisation should conduct an annual review of its safety performance, to assess whether it carries out the declared tasks and responsibilities safely and effectively, as established through its safety policy and safety objectives.
- (b) The safety review should be based on relevant data and information, risk registers and potential risks identified through safety audits, reviews and/or surveys, and it should be appropriate for the size and complexity of the organisation. For large, complex organisations, it should include safety trends.

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

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SAFETY PERFORMANCE INDICATORS

The GH organisation may use the following safety performance indicators:

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

- (b) safety reviews, including trend reviews conducted when introducing new GSE, products (e.g. training) or technologies, when implementing new or updated procedures, or in response to organisational changes that may have an impact on safety or changes to the safety policy, safety objectives, safety performance indicators, safety risk levels;
- (c) safety audits focusing on the integrity of the organisation's management system, on the effectiveness of its safety culture and on periodically assessing the relevance of the safety performance indicators and the effectiveness of actions to mitigate safety risks;
- (d) safety surveys examining particular elements or procedures at a specific aerodrome generated by a particular operational context or bottlenecks in daily operations;
- (e) staff surveys (including cultural surveys), which can provide useful feedback on how engaged personnel are with the SMS;
- (f) changes to the usual volume of GH activities performed over the year, number of new or closed stations, or number of new GH services added to the organisation's portfolio or to operating stations;
- (g) availability of sufficient resources for the safe performance of the declared GH services;
- (h) lessons learned.

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

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MONITORING SAFETY PERFORMANCE BY SMALL GH ORGANISATIONS

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

- (a) changes to safety targets (safety performance indicators) and measures taken to mitigate the identified safety risks, as documented in the safety risk register;
- (b) number of occurrences resulting in damage to aircraft, vehicles or other property or injuries to persons, and the severity of damage or injuries;
- (c) evaluation of adequacy and effectiveness of follow-up and corrective actions taken in response to non-compliance that have been detected as part of the compliance monitoring function;
- (d) safety risks arising from changes such as:
 - (1) an increase or decrease in the volume of GH activities performed over the year that requires an increase in the number of employees (including seasonal employees);
 - (2) provision of new GH services or extension of provision of GH services to other stations;
 - (3) availability of sufficient resources for the safe performance of the services declared.

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

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SAFETY ASSURANCE

- (a) As part of the safety assurance actions, the GH organisation may set up a joint safety committee composed of the organisation's management and representatives of personnel from the operational areas.
- (b) It is recommended that the joint safety committee meet at least quarterly to review safety reports, training needs and outcomes, and operational risk assessments, and to monitor the implementation of safety-related training and procedural changes.

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

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TRAINING AND COMMUNICATION ON SAFETY AND SAFETY CULTURE

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

- (a) Training
 - (1) All operational personnel should receive safety training that is relevant to their safety responsibilities.
 - (2) Adequate records should be kept of all safety training provided.
- (b) Communication
 - (1) The GH organisation should establish communication about safety matters that:
 - (i) ensures that all personnel are aware of the safety management activities relevant to their safety responsibilities;
 - (ii) conveys safety-critical information, especially relating to risks assessed and hazards analysed;
 - (iii) explains why particular actions are taken; and
 - (iv) explains why safety procedures are introduced or changed.
 - (2) Regular meetings with personnel, where information, actions and procedures are discussed, may be held to communicate safety matters.
- (c) Training and communication processes should be assessed and reviewed at relevant intervals to ensure their effectiveness (including understanding by personnel of their individual responsibility in maintaining safety).

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

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SAFETY PROMOTION

- (a) Safety training, combined with safety communication and information sharing, forms part of safety promotion.
- (b) Safety promotion activities support:
 - (1) the organisation's policies, encouraging a positive safety culture, creating an environment that is conducive to the achievement of the organisation's safety objectives;
 - (2) organisational learning;
 - (3) the implementation of an effective safety reporting scheme and the development of a just culture.
- (c) Depending on the particular safety issue, safety promotion may also constitute or complement actions to mitigate risk.

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

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BUILDING AND MAINTAINING A SAFETY CULTURE

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

- (a) SMS training
 - (1) Safety and safety culture training for all levels of management to ensure that personnel are aware of the following:
 - (i) All safety management practices and procedures applicable to their role.
 - (ii) Their individual responsibility in maintaining safety in their daily tasks. This can be achieved by highlighting aspects of safety when delivering training to develop personnel's technical competence. The training should include explanations of why particular safety-related actions are taken and why safety procedures are introduced or changed. The competence of personnel is proven when they are able to draw conclusions from safety information systems and willing to implement safety-related changes.
 - (iii) How various human, technical and organisational factors affect the safety of the whole system.
 - (2) Training on the analysis of safety data and investigation of occurrences for the personnel participating in such activities.
 - (3) Training and communication to encourage personnel to identify hazards and suggest solutions. Use open-ended questions to encourage discussion instead of questions that require only a 'yes' or 'no' answer.

- (b) Communication on safety — open, consistent and transparent communication and information-sharing among GH personnel regarding safety aspects, horizontally (among personnel) and vertically (from management to front-line personnel and vice versa).
- (1) Organise communication sessions to help the GH personnel understand the main concepts of safety culture and become aware of the following aspects:
 - (i) the importance of reporting,
 - (ii) the outcome of reporting (meaningful, visible result),
 - (iii) the potential safety consequences of not reporting,
 - (iv) the concept of a just culture and reporter's protection,
 - (v) the difference between an inadvertent error/mistake/lapse and an intentional act/reckless conduct,
 - (vi) the importance of reporting errors on a voluntary basis and of sharing experiences.
 - (2) Organise formal and informal discussions about safety culture concepts, such as 'error', 'mistake', 'intentional', 'non-intentional', 'negligence', 'wilful misconduct' and 'gross negligence', and examples of 'crossing the line between error and negligence'.
 - (3) Ensure the timely and effective dissemination of safety notices and safety information to all personnel.
 - (4) Include any feedback from past briefings and report on follow-up action taken.
 - (5) Apply positive reinforcement (praise/thanks for appropriate behaviour).
 - (6) Share feedback on disseminated results of reported events on a regular basis, in both formal and informal discussions/meetings.
 - (7) Schedule short debriefings regularly with whole teams about how activities went — aspects that were noticeable, different, not in line with operational procedures, positive or negative — and whether something should be changed. It is important to understand why people do things the way they do.
 - (8) Listen to the concerns of personnel, without being defensive. The purpose of a briefing is to encourage personnel to start thinking about safety problems. Practical examples can be used in the discussion.
 - (9) Review the lessons learned from the organisation's own occurrence reports and safety surveys on a regular basis.
 - (10) Arrange a 'display wall' in the briefing room, to pose questions to personnel — for example, asking them for their opinion about changing an operational procedure — or to inform them about changes stemming from the industry standards that they apply, the regulator or ICAO.
 - (11) Arrange competitions and games that aim to increase awareness of safety or improve the safety of day-to-day activities.
 - (12) Personalise safety outcomes (including health and safety).
 - (13) Participate in safety-related communication campaigns organised by the aerodrome operator or aircraft operator at the aerodrome where the organisation provides GH services.

(c) Safety reporting

- (1) Personnel are encouraged to report essential safety-related information. However, a clear line is drawn between acceptable and unacceptable behaviour. This helps in building accountability.
- (2) Safety reporting is facilitated using forms that are easy to find, easy to fill in and easy to submit, and that ensure full anonymity. Consider the difficulty of reporting after/during a night shift or a difficult shift (involving congested traffic, severe weather conditions, etc.). In unusual or emergency situations, personnel can report directly to decision-makers to allow a timely response. This aids the flexibility and effectiveness of reporting.
- (3) The outcome of internal safety investigations should ensure that the GH organisation disseminates the lessons learned and applies non-punitive measures to improve the safety culture within the organisation and avoid the occurrence of similar incidents.

(d) Human resource management

- (1) Ensure management's full involvement in and support for these activities;
- (2) Allocate sufficient resources to analysing safety events, to identifying the root causes and providing feedback to reporters and to creating a hazard register based on which safety performance indicators can be established to measure the achievement of safety objectives.
- (3) Ask front-line personnel to provide input or feedback when developing or improving procedures.
- (4) Involve, as necessary, front-line GH personnel to clarify technical or procedural aspects in the investigation of occurrences and further dissemination of the outcomes and lessons learned from an event.

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

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GOOD PRACTICES IN BUILDING A SAFETY CULTURE

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

- (a) Provide opportunities for management, operational personnel and personnel representatives to discuss operational risks and promote a positive safety culture.
- (b) Ensure that senior management are aware of the top operational risks ('hotspots') and key safety objectives.
- (c) Involve front-line personnel executing daily operational tasks in safety activities, including hazard identification, procedure development and safety risk assessment and mitigation measures, to provide the operational background and context and ensure a just culture within the organisation.
- (d) Involve senior management in activities promoting safety culture. One of the core messages of safety culture that should be relayed to GH organisations' personnel is that by working safely and not taking risks, and by looking out for each other, everyone gets to go home safely at the end of the day.

- (e) Develop a plan to address gaps and deficiencies identified during the safety culture assessment.
- (f) Communicate the general results of the assessments of personnel's safety culture and action plans throughout the organisation.
- (g) Empower GH personnel to address any safety concerns regarding unsafe operations using a non-punitive reporting system.
- (h) Always provide personal protective equipment to GH operational personnel and encourage them to use all appropriate equipment.
- (i) Personnel do not feel pressure to come into work when unfit to do so.
- (j) Develop standard operating procedures together with the GH personnel and relevant stakeholders.
- (k) Enable and encourage GH personnel to submit suggestions for improving processes and procedures to enhance safety.
- (l) Implement a safety stack model at aerodromes, where this is feasible. However, this initiative remains at the discretion of the aerodrome operator.

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

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SAFETY CULTURE AND JUST CULTURE

- (a) Safety is not the responsibility of a single person or a limited group of people in an organisation. A safety culture should be developed throughout the organisation, involving all personnel as active contributors to the safety of the final product or service.
- (b) Just culture, as a component of safety culture, operates with complex concepts. Therefore, it is important to consider human factors in the way in which training is provided to GH personnel, to ensure its effectiveness. For example, complex concepts should be explained in simple terms and using concrete and relevant examples from daily operation.
- (c) It is good practice for the GH organisation to develop a just culture policy (ideally a stand-alone document) that is formally endorsed by top management and staff representatives.
- (d) The GH organisation could refer to the European Corporate Just Culture Declaration.

SAFETY CULTURE INDICATORS

The GH organisation may use the following table, containing safety culture characteristics and indicators, to measure the maturity of safety culture in its organisation (from the Netherlands Aerospace Centre's study Aircraft Ground Handling and Human Factors¹):

Characteristic	Indicators
Commitment <i>Reflects the extent to which every level of the organisation has a positive attitude towards safety and recognises its importance.</i>	— Management concern — Personal concern — Investment in safety

¹ Balk, A. D. and Bossenbroek, J. W., Aircraft Ground Handling and Human Factors, NLR-CR-2010-125, Netherlands Aerospace Centre: Air Transport Safety Institute, Amsterdam, 2010, <https://www.easa.europa.eu/sites/default/files/dfu/Aircraft-Ground-Handling-and-Human-Factors-NLR-final-report.pdf>.

Characteristic	Indicators
Justness <i>Reflects the extent to which safe behaviour and reporting of safety issues are encouraged or even rewarded and unsafe behaviour is discouraged.</i>	— Evaluation of (un)safe behaviour — Perception of evaluation — Passing of responsibility
Information <i>Reflects the extent to which safety-related information is distributed to the right people in the organisation.</i>	— Safety training — Communication of safety-related information — Safety reporting system — Willingness to report — Consequences of safety reports
Awareness <i>Reflects the extent to which employees and management are aware of the risks the organisation's operations pose to themselves and to others.</i>	— Awareness of job-induced risks — Attitudes towards unknown hazards — Attention to safety
Adaptability <i>Reflects the extent to which employees and management are willing to learn from past experiences and are able to take whatever action is necessary to enhance the level of safety within the organisation.</i>	— Actions after safety occurrences — Proactiveness to prevent safety occurrences — Employee input
Behaviour <i>Reflects the extent to which every level of the organisation behaves to maintain and improve the level of safety.</i>	— Job satisfaction — Working situation — Employee behaviour with respect to safety — Mutual expectations and encouragement

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

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CONSIDERATION OF FATIGUE IN PLANNING GH ACTIVITIES

- (a) The GH organisation is already subject to compliance with the provisions of [Directive 2003/88/EC](#) of the European Parliament and of the Council of 4 November 2003 concerning certain aspects of the organisation of working time. This is considered the most relevant document enabling the GH organisation to manage fatigue among its GH operational personnel.
- (b) Fatigue is one of the factors that may contribute to errors when it is not properly considered as part of planning activities.
- (c) Fatigue may be induced by:
 - (1) the environment and conditions in which work is carried out (e.g. noise, rain, high or low temperature), working in enclosed spaces, lifting/moving heavy items or working in uncomfortable positions (e.g. in a bent position or on knees);
 - (2) excessive hours of duty and shift working, particularly with changing shift periods or patterns, work intensification due to, for example, flight delays or short turnaround times, personnel shortage, additional overtime or night work.
- (d) The way and the extent to which the GH organisation should consider the threat of fatigue in the planning of GH tasks and organisation of shifts may vary from one organisation to another, depending on the type of GH activity and the operational context in which it is performed (where, when and by whom).

- (e) Fatigue is one example of a human factor that should be considered by the management system, particularly in the planning of activities. In this respect, where the personnel involved in an activity are prone to experiencing fatigue, it is recommended that the GH organisation:
 - (1) ensure that the safety reporting system required by point [ORGH.GEN.165](#) enables the collection of data on fatigue issues;
 - (2) ensure that the threat of fatigue is adequately considered by the management system's key processes (e.g. assessment, management, monitoring);
 - (3) provide safety-related promotional material and adapt safety training accordingly.
- (f) When organising shifts, the GH organisation should consider good practices in the GH domain and applicable rules. Below are a few examples of how the GH organisation can set up activities and shifts in a way that enables GH personnel to remain sufficiently free from fatigue to perform the planned activities safely:
 - (1) include regular breaks in the working schedule, adjusted to the type of activity;
 - (2) provide rest periods of sufficient time to enable workers to overcome the effects of the previous shift and to be rested by the start of the following shift;
 - (3) avoid shift patterns that cause a serious disruption of an established sleep/work pattern, such as alternating day/night duties;
 - (4) inform the personnel of the shift schedule and changes to it sufficiently in advance to enable them to plan adequate rest;
 - (5) plan recurrent extended rest periods and notify the personnel of these sufficiently in advance.
- (g) It is recommended that the GH organisation have a procedure, including mitigation measures, to address cases where working hours are going to be significantly increased or where shift patterns will be significantly modified, such as for urgent operational reasons. In cases not covered by that procedure, the organisation is expected to perform a specific risk assessment and define additional mitigation actions, as applicable. Basic mitigation measures may include:
 - (1) provision of additional supervision;
 - (2) use of additional rest breaks.

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

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COMPLIANCE MONITORING — INTERNAL AUDITS

- (a) Compliance monitoring process
 - (1) The implementation of a compliance monitoring process should enable a GH organisation to monitor its compliance with the requirements of [Annexes I and II](#) to [Commission Delegated Regulation \(EU\) 2025/20](#), as well as with any other applicable regulatory requirements and instructions and with procedures established by the aerodrome operator or the aircraft operator to which GH services are provided.
 - (2) The compliance monitoring process should be properly implemented and maintained and continually reviewed and improved, as necessary.

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- (3) Compliance monitoring should include a method of providing feedback on the findings to the accountable manager to ensure the effective implementation of corrective actions, as necessary.
 - (4) The GH organisation should monitor the consistent application of its operational procedures and their compliance with the applicable procedures of the aircraft operators to which it provides services and the aerodrome operator of the aerodromes where it operates. In doing so, the organisation will ensure that its activities are performed safely. The GH organisation should, as a minimum and where appropriate, monitor the compliance of the following elements with the applicable requirements:
 - (i) the declaration;
 - (ii) the SMS;
 - (iii) the training programmes;
 - (iv) the documents and records system, including the GH manual;
 - (v) the procedures for local operation contained in the aerodrome manual that are applicable to the GH organisation;
 - (vi) the GSE maintenance programme;
 - (vii) the GH activities of the organisation carried out under the supervision of the person(s) nominated in accordance with point [ORGH.MGM.210\(b\)\(3\)](#);
 - (viii) any activities outsourced in accordance with [ORGH.MGM.205](#), for compliance with the contract.
- (b) Organisational set-up
- (1) The accountable manager, as directly accountable for safety, should ensure, in accordance with point [ORGH.MGM.210\(a\)](#), that sufficient resources are allocated to compliance monitoring. When the person responsible for compliance monitoring also acts as the safety manager, the accountable manager should ensure that sufficient resources are allocated to both functions, taking into account the size of the GH organisation and the complexity of its activities.
 - (2) The independence of the compliance monitoring function should be established by ensuring that audits and inspections are not carried out by personnel responsible for the function, process or procedure being audited.
 - (3) Personnel involved in compliance monitoring should have access to any part of the GH organisation and any contracted organisation, as required.
- (c) Compliance monitoring documentation
- (1) Relevant documentation should include the relevant part(s) of the GH organisation's management system documentation.
 - (2) In addition, relevant documentation should include the following:
 - (i) terminology;
 - (ii) specified activity standards;
 - (iii) a description of the organisation;
 - (iv) the allocation of duties and responsibilities;
 - (v) procedures for ensuring regulatory compliance;

- (vi) the compliance monitoring programme, reflecting:
 - (A) the schedule of the programme;
 - (B) audit and inspection procedures, including an audit plan that is implemented, maintained and continually reviewed and improved;
 - (C) reporting procedures;
 - (D) root cause analyses for findings identified during internal compliance monitoring activities;
 - (E) procedures for follow-up and corrective action; and
 - (F) the recording system;
 - (vii) the syllabus of the training referred to in point (d)(2);
 - (viii) document control.
- (d) Training
- (1) To achieve optimum outcomes of training, the GH organisation should ensure that all personnel understand the training objectives, as set out in the organisation's management system documentation.
 - (2) The persons responsible for the compliance monitoring function should receive training in this function. The training should cover the compliance monitoring requirements, the manuals and procedures related to the necessary tasks, auditing techniques, root cause analysis, reporting and recording.
 - (3) Time and resources should be allocated based on the volume and complexity of the activities concerned.
- (e) Compliance monitoring — audit scheduling
- (1) The GH organisation should establish audit schedules to be completed during a specified period, as well as a periodic review cycle for each audited area. The compliance monitoring itself should also be audited according to a defined audit schedule. Unscheduled audits should be possible to perform when non-compliance data shows an increasing trend. The audits should follow up on corrective actions to ensure that they have been implemented, effective and completed, in accordance with the policies and procedures specified in the GH manual.
 - (2) The management system's key processes and procedures and the operation of the GH organisation should be audited within the first 12 months from the date when the declaration was first registered.
 - (3) Following that, the GH organisation should consider the results of its safety risk assessments and past compliance monitoring activities in order to adapt the planning cycle for its compliance monitoring activities to cover its management system's key processes, procedures, training and operations. This planning cycle should not exceed 36 months or the duration of the oversight planning cycle established by the competent authority for each organisation (whichever is shorter).

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

ED Decision 2025/007/R

COMPLIANCE MONITORING — GENERAL

- (a) The completion of a safety risk register is one of the most relevant methods of compliance monitoring, along with the documentation related to safety risk management and to mitigation measures and their implementation.
- (b) The person(s) responsible for compliance monitoring may perform all audits and inspections themselves or appoint one or more auditors by choosing personnel with the relevant competence and qualification (as defined in point (b) of [AMC1 ORGH.MGM.210\(g\)\(1\)](#)), from either within or outside the GH organisation.
- (c) Regardless of the option chosen, it is recommended that the independence of the audit function remain unaffected, in particular where those persons performing the audit or inspection are also responsible for other functions within the GH organisation.
- (d) When compliance audits or inspections are performed by a contracted party:
 - (1) it is recommended that any such audits or inspections be performed under the responsibility of the person(s) responsible for compliance monitoring within the GH organisation; and
 - (2) the GH organisation remains responsible for ensuring that the personnel of the contracted party have knowledge and experience relevant to the activities being audited or inspected, including qualifications and experience in compliance monitoring.
- (e) The GH organisation remains responsible for ensuring the effectiveness of compliance monitoring, in particular for the effective implementation and follow-up of all corrective actions.

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

ED Decision 2025/007/R

COMPLIANCE MONITORING — SMALL GH ORGANISATIONS

- (a) Compliance monitoring audits and inspections may be documented using a compliance monitoring checklist, and any findings recorded in a non-compliance report. The following documents may be used for this purpose.
- (b) The elements to be checked for a GH activity should be those that make up the steps involved in the operational procedure that is applied for that activity.

COMPLIANCE MONITORING CHECKLIST			
Year			
Subject	Date checked	Checked by	Comments/non-compliance Report N°
GH activity			
Instructions for the provision of the GH service			
Dangerous goods instructions, if applicable			

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

NON-COMPLIANCE REPORT N°			
Reported by:		Date:	
Category: GH activity ☐ Training ☐ GSE maintenance ☐ Safety management ☐ Documentation ☐			
Description:		Reference:	
Level of finding:			
Root cause of non-compliance:			

Suggested correction:	
Compliance monitoring person:	
Corrective action required: ☐	Corrective action not required: ☐
Responsible person:	Time limitation:
Corrective action:	Reference:
Signature of responsible person:	Date:
Compliance monitoring person:	
Correction and corrective action verified: ☐	Report closed: ☐
Signature of compliance monitoring person:	Date:

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

ED Decision 2025/007/R

INTEGRATED MANAGEMENT SYSTEM

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

- (a) other certificates approvals, authorisations issued or declarations submitted under [Regulation \(EU\) 2018/1139](#) and its delegated and implementing acts that are intended to be covered by the integrated management system;
- (b) the domains that are integrated in its management system, with the interfaces that enable effective functioning and communication between them; and
- (c) applicable requirements for each domain.

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

ED Decision 2025/007/R

INTEGRATED MANAGEMENT SYSTEM

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

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

- (b) Aerodrome operators providing GH services and aircraft operators performing self-handling are not expected to duplicate their existing management systems to comply with [Commission Delegated Regulation \(EU\) 2025/20](#).
- (c) The organisations mentioned in point (b) are instead expected to revise their existing management system to cover the new elements required by Commission Delegated Regulation (EU) 2025/20, in particular:
 - (1) the organisation's safety policy and safety risk management process;
 - (2) its compliance monitoring function;
 - (3) the duties and responsibilities of its GH personnel;
 - (4) interfaces with the other activities performed by the organisation;
 - (5) the training programme of the personnel performing GH activities;
 - (6) GH processes and procedures;
 - (7) documents and records;
 - (8) the policy regarding the management of change;
 - (9) the maintenance programme for GSE.

ORGH.MGM.201 Information security management system

Regulation (EU) 2025/20

The ground handling organisation shall establish, implement and maintain an information security management system in accordance with the Annex (Part-IS.D.OR) to [Commission Delegated Regulation \(EU\) 2022/1645](#)¹ to ensure the proper management of information security risks which may have an impact on aviation safety.

[point ORGH.MGM.201 applicable from 27 March 2031 — Regulation (EU) 2025/20]

ORGH.MGM.205 Contracted services or products

Regulation (EU) 2025/20

- (a) Where the ground handling organisation, for the purpose of its operation or compliance with this Regulation, enters into contracts for 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 once the ground handling organisation has applied the safety management process to manage the risk of those services or products for its own operation.

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 ([OJ L 248, 26.9.2022](#), p. 18, ELI: http://data.europa.eu/eli/reg_del/2022/1645/oj).

- (b) When the ground handling organisation enters into contracts for services or products that are certified, authorised, approved or declared in accordance with Regulation (EU) 2018/1139 and its delegated and implementing acts, the organisation providing those services or products shall be responsible for their safety, in compliance with the EU aviation regulations applicable to that organisation and the relevant requirements of [Annex I](#) or [Annex II](#) to this Regulation.
- (c) The ground handling organisation shall ensure all the following:
 - (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.

AMC1 ORGH.MGM.205 Contracted services or products

ED Decision 2025/007/R

RESPONSIBILITIES WHEN CONTRACTING SERVICES

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

AMC2 ORGH.MGM.205 Contracted services or products

ED Decision 2025/007/R

AUDITS PERFORMED BY THIRD-PARTY AUDITORS

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

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

GM1 ORGH.MGM.205 Contracted services or products

ED Decision 2025/007/R

THIRD-PARTY SERVICE PROVIDERS

- (a) It is recommended that the GH organisation consider, when selecting the providers of contracted services, relevant references and criteria such as safety and security aspects, or whether the safety culture in the contracted organisation is commensurate with the one in its own organisation, to ensure the safety of its own operation.
- (b) If the contracted service is a GH service listed in [Article 2\(2\)](#) of [Commission Delegated Regulation \(EU\) 2025/20](#), the provider of those services is bound to comply with that Regulation.

ORGH.MGM.210 Personnel

Regulation (EU) 2025/20

- (a) The ground handling organisation shall appoint an accountable manager. This person shall:
 - (1) be accountable for the safe provision of ground handling services;
 - (2) have the authority to ensure that sufficient resources are allocated so that all activities can be carried out in accordance with this Regulation;
 - (3) be responsible for establishing and maintaining an effective management system.
- (b) The ground handling organisation shall appoint one or more competent persons for the following functions:
 - (1) safety management;
 - (2) ground handling training;
 - (3) ground handling operations;
 - (4) if applicable, cargo operations.
- (c) The competent person for the safety management function shall be responsible for the management and implementation of the safety management system within the whole ground handling organisation. The competent person for this function shall act independently of other

functions within the organisation, shall have direct access to the accountable manager and to other management personnel, as relevant for safety matters, and shall report to the accountable manager. The following arrangements may apply:

- (1) depending on the scale of operations, one or more persons may be appointed to manage the safety of the provision of ground handling services at each aerodrome. One person may be responsible for more than one aerodrome. That or those persons shall report to the competent person(s) for the safety management [of the organisation], as determined by the ground handling organisation and clarified in its ground handling manual;
 - (2) aircraft operators performing self-handling and aerodrome operators providing ground handling services may integrate the safety manager function within another function with similar responsibilities already existing in their organisation under the applicable requirements.
- (d) The competent person for the ground handling training function shall be responsible for the development and implementation of the training and assessment programme and continued competence of the personnel involved in ground handling activities. The competent person for this function shall have direct access to the accountable manager and to the appropriate management for training matters.
- (e) The competent person for the ground handling operations function shall be responsible for the coordination and safety performance of all ground handling activities at all aerodromes or regionally, as established by the ground handling organisation and described in its standards and objectives in accordance with point [ORGH.GEN.110\(c\)](#). The competent person for this function shall have direct access to the accountable manager and to the appropriate management for operational matters. Aircraft operators, holders of an air operator certificate, who perform self-handling may integrate this function within the already existing function of the organisation's nominated person for ground operations.
- (f) The competent person for the cargo operations function shall be responsible for the coordination and safety performance of all cargo operations either at all aerodromes or regionally, as established by the organisation and described in its standards and objectives in accordance with point [ORGH.GEN.110\(c\)](#).
- (g) In addition, the ground handling organisation shall establish the following functions:
- (1) a function for the implementation of the compliance monitoring process required under point [ORGH.MGM.200\(b\)\(6\)](#); the competent person or persons for that function shall have direct access to the accountable manager;
 - (2) a function for the operation and maintenance of the GSE, if the organisation uses GSE in the frame of its operation; the ground handling organisation shall determine the reporting lines for this function, which may be carried out by one or more persons.
- (h) The ground handling organisation shall establish a proportionate number of supervisory functions considering the structure of the organisation and the number of personnel employed. The persons exercising supervisory functions shall coordinate, advise and ensure that the individuals in a team perform the ground handling activities in accordance with the established standards and operational procedures included in the organisation's ground handling manual. The duties and responsibilities of the person or the persons exercising those functions shall be well defined, and any other arrangements shall be made to ensure that they can discharge their responsibilities. The supervisory functions shall be exercised by competent individuals with the skills to ensure the performance of ground handling activities as per the organisation's standards specified in the ground handling manual.

- (i) The same person may fulfil more than one function referred to in points (b), (g) and (h) if both the following conditions are met:
 - (1) they are trained and qualified to perform the assigned tasks;
 - (2) any conflict of interest in performing the assigned tasks has been addressed before the person takes up those functions.
- (j) The ground handling organisation shall have sufficient and qualified personnel for the safe provision of ground handling services in accordance with this Regulation.

AMC1 ORGH.MGM.210 Personnel

ED Decision 2025/007/R

CUMULATION OF FUNCTIONS

- (a) The cumulation of several functions into one person's role, including the function of an accountable manager, should depend on the size of the organisation and the scale of its operation. The person should meet two main conditions, namely to be competent and to have the capacity to fulfil their assigned responsibilities.
- (b) As regards competence in different areas of responsibility, there should not be any difference from the requirements applicable to persons holding only one post.

AMC1 ORGH.MGM.210(c) Personnel

ED Decision 2025/007/R

RESPONSIBILITIES OF THE SAFETY MANAGEMENT FUNCTION

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

- (a) The safety manager should act as the focal point and be responsible for the development, management and maintenance of an effective SMS. The safety manager should perform the following duties and responsibilities:
 - (1) act as a focal point for the safety aspects of the GH activities, as per ICAO Doc 9859 (Section 9.3.6);
 - (2) monitor safety concerns in the aviation industry;
 - (3) coordinate and communicate with the competent authority and with the accountable manager;
 - (4) facilitate hazard identification, risk analysis and management;
 - (5) monitor the implementation of actions taken to mitigate risks, as listed in the safety action plan;
 - (6) provide periodic reports on safety performance;
 - (7) ensure the maintenance of safety management documentation;
 - (8) ensure that safety management training is available and that it meets acceptable standards;
 - (9) provide independent advice on safety matters;

- (10) ensure the initiation and follow-up of internal occurrence investigations;
- (11) assess the risks related to changes affecting the main elements of the declaration.
- (b) For GH organisations with over 25 FTEs, the safety management function should be independent of operational line management.

AMC2 ORGH.MGM.210(c) Personnel

ED Decision 2025/007/R

SAFETY MANAGER

- (a) Depending on the size of the GH organisation, the safety manager may be assisted by additional safety personnel to enable the performance of all tasks related to safety management.
- (b) Regardless of the organisational set-up, it is important that the safety manager remains the unique focal point as regards the development, administration and maintenance of the operator's SMS.

COMPETENCIES OF THE SAFETY MANAGER

- (c) The safety manager supports, facilitates and leads the implementation and maintenance of the SMS, fostering an organisational culture that ensures effective safety management, risk management and occurrence reporting. The competencies of the safety manager should include, but not be limited to, the following:
 - (1) knowledge of:
 - (i) ICAO standards and European requirements and provisions on safety management, related to:
 - (A) monitoring safety performance,
 - (B) conducting safety risk assessments,
 - (C) managing safety information databases (systems),
 - (D) investigating reportable matters and hazardous events;
 - (E) safety promotion/communication methods;
 - (ii) basic safety investigation techniques;
 - (iii) human factors in aviation;
 - (2) other suitable skills and competencies include:
 - (i) promotion of a positive safety culture,
 - (ii) interpersonal, influencing and leadership skills,
 - (iii) oral and written communication skills,
 - (iv) data management, analytical and problem-solving skills,
 - (v) computer skills; for example, in word processing, spreadsheets and database management,
 - (vi) professional integrity.

- (d) The safety manager should have work experience, relevant and documented, preferably in a comparable position, in any of the following areas:
- (1) management systems, including compliance monitoring systems, and safety management;
 - (2) GH operations.

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

ED Decision 2025/007/R

COMPLIANCE MONITORING FUNCTION

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

- (a) If more than one person is appointed to perform the compliance monitoring function, the accountable manager should identify the person who acts as the unique focal point (i.e. the 'compliance monitoring manager'.)
- (b) The person(s) responsible for compliance monitoring should:
 - (1) be able to demonstrate relevant knowledge of, and appropriate experience in GH operations, and qualification(s) and experience in compliance monitoring;
 - (2) have knowledge of the applicable requirements in the GH domain; and
 - (3) have access to all parts of the GH organisation and, as necessary, any contracted service provider.
- (c) In a small GH organisation, this function may be executed by the accountable manager if the accountable manager complies with points (b)(1) and (2).
- (d) If the compliance monitoring function and the safety management function are cumulated in one person, the accountable manager should ensure that:
 - (1) sufficient resources are allocated to both functions, considering the size and complexity of the organisation;
 - (2) the person is qualified and competent to perform both functions;
 - (3) any potential conflict of interest between the two functions is addressed.
- (e) The independence of the compliance monitoring function should be established by ensuring that audits and inspections are carried out by personnel not responsible for the function, procedure or products being audited.

AMC1 ORGH.MGM.210(j) Personnel

ED Decision 2025/007/R

SUFFICIENT PERSONNEL

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

GM1 ORGH.MGM.210(j) Personnel

ED Decision 2025/007/R

PLANNING SUFFICIENT PERSONNEL FOR SAFE PROVISION OF GH SERVICES

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

- (a) types of GH services provided as per the declaration and tasks planned;
- (b) number of stations covered;
- (c) peak seasons and changes to the seasonal flight programmes;
- (d) number of aircraft operators to which it provides services;
- (e) estimated number of ad hoc requests for GH services per season;
- (f) any GH services contracted to third parties.

ORGH.MGM.215 Facilities

Regulation (EU) 2025/20

- (a) The ground handling organisation shall ensure availability of facilities allowing the performance and management of all planned tasks and activities provided for in [Annex I](#) and [Annex II](#) to this Regulation.
- (b) Where the ground handling 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, all the following requirements shall be complied with:
 - (1) the facility has clear in-bound and outbound flows and dedicated areas for dangerous goods acceptance and for loading and unloading of packages and ULDs;
 - (2) an X-ray verification area is provided;
 - (3) segregation of dangerous goods according to their compatibility and their separation from general cargo are ensured in accordance with the international standards and recommended practices;
 - (4) adequate conditions are provided to prevent any damage to the dangerous goods items;
 - (5) the storage area for dangerous goods items is visibly marked and is temperature-controlled, where applicable;
 - (6) an emergency toolkit is readily available.

AMC1 ORGH.MGM.215 Facilities

ED Decision 2025/007/R

STORAGE AREA FOR DANGEROUS GOODS

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

- (a) A map of the dangerous goods storage facility is provided at all storage facilities and dangerous goods acceptance areas, indicating the following:
 - (1) purpose of the storage facility, including the classes and divisions of dangerous goods to be stored;

- (2) storage area for temporary or long-term storage of dangerous goods, with visible markings for separation such as paint or red-and-white-striped ribbon;
 - (3) if applicable, the point of loading/unloading from/to ULDs or build-up of ULDs;
 - (4) public area or airside safety (restricted) area;
 - (5) entrance, exit and area for transit to the storage facility/warehouse;
 - (6) dangerous goods acceptance area;
 - (7) if applicable, positioning of X-ray equipment;
 - (8) positioning of fire extinguishers.
- (b) Any necessary approvals from other state entities — for example, for environmental protection, emergency response or the storage of explosive or radioactive material, are obtained in advance, or such approvals are obtained by the aerodrome operator providing the storage facility.
 - (c) Fire extinguishers specific to dangerous goods are stored and instructions for their use are available at the location.
 - (d) The storage conditions are adequate to address the specific hazards of the dangerous goods classes and divisions to be stored in the facility.
 - (e) Dangerous goods are segregated in accordance with ICAO's Technical Instructions.
 - (f) The acceptance point is located as close as possible to the storage facility and properly marked as the dangerous goods acceptance point.
 - (g) A copy of the international standards and recommended practices for dealing with dangerous goods is available at the acceptance point.
 - (h) Emergency response procedures are easy to access or displayed in a visible location.
 - (i) The area where the acceptance documents are kept (dangerous goods acceptance checklist, airway bill, shipper's declaration, etc.) is easily accessible to the authorised personnel.

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

Regulation (EU) 2025/20

The ground handling organisation shall ensure that the software it uses for the provision of ground handling services is functional and does not negatively affect the safety of the flight. It shall ensure that:

- (a) a backup system is available to ensure operational continuity in case of breakdown;
- (b) the data is easily accessible and retrievable upon request by authorised persons;
- (c) if the software includes document issuance, it complies with point [ORGH.DOC.100](#);
- (d) personnel are trained and competent to use the software to perform their assigned tasks.

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

ED Decision 2025/007/R

SOFTWARE

- (a) Any of the software used by the GH organisation to provide GH services is in the scope of point [ORGH.MGM.220](#) if its malfunction would endanger the safety of a flight. The following list of activities or processes for which software is used is not exhaustive:
- (1) departure control;
 - (2) turnaround coordination;
 - (3) de-icing/anti-icing documentation or management of holdover time tables;
 - (4) ramp resource planning;
 - (5) driving and operation of autonomous vehicles;
 - (6) baggage and cargo sorting, and processing/preparation of baggage and cargo for loading;
 - (7) processing and documentation of cargo or dangerous goods or completion of load control documentation.
- (b) Before using new software, it is recommended that the GH organisation ensure, when feasible, that it has been properly tested for use in an aviation environment, is robust enough for use in daily operation and does not pose a risk to the safety of operations.
- (c) Testing the software is recommended to ensure that it is fully functional following updates.

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

ED Decision 2025/007/R

AUTHORISED PERSONS

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

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

SUBPART DEC — DECLARATION

ORGH.DEC.100 Declaration — general requirements

Regulation (EU) 2025/20

- (a) The ground handling organisation shall submit a duly filled declaration, including the annex for each aerodrome where it provides services, to the competent authority as identified in point [ORGH.GEN.105](#).
- (b) If the ground handling 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 name and/or contact details of the accountable manager;
 - (3) adding or removing aerodromes where it provides ground handling services;
 - (4) adding or removing ground handling services provided at an aerodrome listed in the declaration;
 - (5) new AltMoC;
 - (6) implementation of an industry standard.
- (c) The ground handling organisation shall ensure compliance with this Regulation and with the information provided in the declaration and shall maintain continued compliance throughout its activities.

AMC1 ORGH.DEC.100 Declaration — general requirements

ED Decision 2025/007/R

SUBMITTING A DECLARATION

- (a) The GH organisation should submit its declaration or amended declaration at least 10 working days before starting the operation or before the changes indicated become effective, respectively. This point does not apply to GH organisations that were already operating on the date of applicability of [Commission Delegated Regulation \(EU\) 2025/20](#). Such GH organisations should comply with [Article 5](#) of that Regulation.
- (b) It is the responsibility of the GH organisation to ensure that the declaration has been successfully submitted to the competent authority. If the organisation does not receive acknowledgement of receipt of the declaration from the competent authority, as indicated in point [ARGH.OVS.320](#) of [Commission Implementing Regulation \(EU\) 2025/23](#) and [AMC1 ARGH.OVS.320\(a\)](#), it should contact the competent authority.

GM1 ORGH.DEC.100 Declaration — general requirements

ED Decision 2025/007/R

GENERAL

The intention of a declaration is to:

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

- (b) inform the competent authority of the existence of a GH organisation; and
- (c) enable the competent authority to conduct oversight in accordance with Subpart [ARGH.OVS](#) of [Commission Implementing Regulation \(EU\) 2025/23](#).

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

Regulation (EU) 2025/20

If a ground handling 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.

The prior notice to the aerodrome operator referred to in point (a) shall be made sufficiently in advance, as established in the formal arrangements with the aerodrome operator, so that the latter can take appropriate measures, as necessary, for the continuation of the service at the aerodrome.

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

ED Decision 2025/007/R

NOTIFICATION

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

Appendix 1 — DECLARATION FORM

Regulation (EU) 2025/20

DECLARATION in accordance with Commission Delegated Regulation (EU) 2025/20																											
Name of organisation: Name, email and telephone number of the accountable manager: Organisation's principal place of business: Provision of ground handling services: To third-party aircraft operators ☐ Self-handling^(*) ☐ This organisation is: ☐ a stand-alone ground handling organisation ☐ integrated part of an aerodrome operator, namely ☐ integrated part of an aircraft operator or of a single air carrier business grouping, namely Name, email and telephone number of the person assigned with the ground handling safety function: Intended date of starting ground handling operations^(**): (*): Including to aircraft operators part of the same single air carrier business grouping. (**): For organisations already operating at the date of application of this Regulation, this date shall indicate the date at which the declaration is submitted. EU aerodrome(s) at which the organisation provides services, in full name and ICAO code: <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="width: 5%;">N°</th> <th style="width: 40%;">Aerodrome name</th> <th style="width: 20%;">ICAO code</th> <th style="width: 35%;">State</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td><i>e.g. Konrad-Adenauer Cologne Bonn</i></td> <td><i>EDDK</i></td> <td><i>Germany</i></td> </tr> <tr> <td style="text-align: center;">2</td> <td></td> <td></td> <td></td> </tr> <tr> <td style="text-align: center;">3</td> <td></td> <td></td> <td></td> </tr> <tr> <td style="text-align: center;">4</td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>				N°	Aerodrome name	ICAO code	State	1	<i>e.g. Konrad-Adenauer Cologne Bonn</i>	<i>EDDK</i>	<i>Germany</i>	2				3				4							
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Statements

- | | | | | |
|--|--|--|--|--|
| ☐ | The ground handling organisation has developed and implements a management system that includes a safety policy, safety risk management, and procedures for the provision of ground handling service(s) covered by this declaration, in accordance with the essential requirements set out in point 4.2 of Annex VII to Regulation (EU) 2018/1139 and in point ORGH.MGM.200 (Management system) of Annex I to Delegated Regulation (EU) 2025/20. | | | |
| ☐ | (If applicable)

The AltMoC with references to the associated AMC they replace have been submitted to the competent authority. | | | |
| ☐ | The ground handling services are carried out in accordance with the ground handling manual established as part of the essential requirements set out in point 4.2.3. of Annex VII to Regulation (EU) 2018/1139 and as required by point ORGH.DOC.110 of Annex I to Delegated Regulation (EU) 2025/20. | | | |
| ☐ | All pieces of GSE used are current with the maintenance programme as specified in Subpart ORGH.GSE of Annex I to Delegated Regulation (EU) 2025/20. | | | |
| ☐ | All ground handling personnel are trained in accordance with Subpart ORGH.TRG of Annex I to Delegated Regulation (EU) 2025/20 and their competence is maintained so that they perform their tasks safely and according to the standards established by the ground handling organisation. | | | |
| ☐ | The ground handling organisation complies and will continue to comply with the occurrence-reporting obligations set out in [the essential requirements] point 4.2.2 of Annex VII to Regulation (EU) 2018/1139 and with the provisions of Regulation (EU) No 376/2014 and their delegated and implementing acts. | | | |
| ☐ | (If applicable)

The ground handling organisation implements industry standards and good practices. <table border="1" style="width: 100%; margin-top: 5px; border-collapse: collapse;"> <tr> <td style="padding: 2px 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: | | | | |
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| ☐ | The ground handling organisation will notify the competent authority of any changes to its organisation, the components of its management system, and its operation as declared herein and as detailed in point ORGH.DEC.100 of Annex I to Delegated Regulation (EU) 2025/20. | | | |

☐	The ground handling organisation confirms that all the necessary arrangements with the aerodrome operator(s) have been duly made in advance of starting operation, such as but not limited to: (a) the type of ground handling services intended to be provided at that aerodrome; (b) the date of starting the operation at the aerodrome; (c) methods of exchanging operational and relevant safety information with the aerodrome operator including the reporting and analysis of relevant safety occurrences; and (d) participation in the aerodrome safety committees.
☐	The ground handling organisation confirms that the information disclosed in this declaration, including all Annexes, is correct.
☐	The ground handling organisation consents to the publication of its contact details provided in this declaration, either on the website of its national competent authority or on that of EASA, or on both, once the declaration has been received by the competent authority concerned.
Date, name and signature of the accountable manager:	

Annex to the Declaration (*)

(*) To be filled individually for each aerodrome where the organisation provides ground handling services under this declaration.

Annex No XXX to the Declaration for ⁽¹⁾ ⁽²⁾ <i>Notes:</i> ⁽¹⁾ Aerodrome name in full. ⁽²⁾ ICAO code.
(1) Name, email and telephone number of the representative of the ground handling organisation at the aerodrome referred to in this Annex: (2) Name, email and telephone number of the person responsible for the safety management at the aerodrome referred to in this Annex (*): <i>Note: The same person may cumulate the responsibilities referred to in points (1) and (2) and may be responsible for more than one aerodrome.</i>
Starting date of operation at this aerodrome (*): (*) If the organisation already provides services at this aerodrome at the date when this Regulation becomes applicable, this date shall indicate the date when the declaration is submitted.

List of ground handling services provided at the aerodrome covered by this Annex to the Declaration, pursuant to Article 2(2) of Delegated Regulation (EU) 2025/20	
Passenger handling (Article 2(2), point (a)) — please specify:	☐
Handling of passengers with reduced mobility (Article 2(2), point (a))	☐
Baggage handling (Article 2(2), point (b)) — please specify:	☐
Aircraft servicing	
Operation of GSE used for ground handling services (Article 2(2), point (c)(i))	☐
Aircraft refuelling and defuelling – into-plane fuelling services (Article 2(2), point (c)(ii))	☐
Aircraft toilet servicing (Article 2(2), point (c)(iii))	☐
Aircraft potable water servicing (Article 2(2), point (c)(iv))	☐
Aircraft exterior cleaning (Article 2(2), point (c)(v))	☐
Aircraft de-icing/anti-icing (Article 2(2), point (c)(vi)); also specify if supervision of de-icing/anti-icing is provided:	☐
Turnaround activities	
Aircraft arrival activities (Article 2(2), point (d)(i))	☐
Aircraft loading/unloading (Article 2(2), point (d)(ii))	☐
Loading supervision (Article 2(2), point (d)(ii))	☐
Aircraft departure activities (Article 2(2), point (d)(iii))	☐
Aircraft towing/pushback (Article 2(2), point (d)(iv)): Towing ☐ Pushback ☐ Vehicle operation ☐ Headset communication ☐ Wing-person guidance ☐	☐

Cargo and mail handling	
Cargo acceptance on behalf of the aircraft operator (Article 2(2), point (e)(i))	☐
Final build-up and storage (Article 2(2), point (e)(ii))	☐
Final weighing and tagging of ULD (Article 2(2), point (e)(iii))	☐
Final checks before air transportation (Article 2(2), point (e)(iv))	☐
Ground transportation of cargo/mail between the point of final checks and the aircraft (Article 2(2), point (e)(v))	☐
Dangerous goods	
Passenger handling	☐
Baggage handling	☐
Dangerous goods acceptance as cargo	☐
Dangerous goods handling as cargo	☐

GM1 ORGH.DEC Appendix 1 — Declaration form

ED Decision 2025/007/R

INDUSTRY STANDARDS/GOOD PRACTICES TO BE DECLARED

See [GM1 ORGH.GEN.125](#). The list is not exhaustive.

SUBPART DOC — DOCUMENTS AND RECORDS

ORGH.DOC.100 Documents and records systems

Regulation (EU) 2025/20

- (a) The ground handling organisation shall establish a document system and a record system as part of its management system.
- (b) The ground handling organisation shall ensure that all documents and records and any associated amendments are accessible to the ground handling organisation's personnel for duty purposes, and to authorities, or to other entities for audit or inspection purposes, upon request. The records shall be easily traced and retrievable throughout the required retention period.
- (c) The documents and records shall be stored and secured to ensure protection from damage, alteration and theft.
- (d) The documents and records shall be easily legible in any format they may be. The ground handling organisation shall specify in its documentation the method of disposal or deletion of the documents and records.

AMC1 ORGH.DOC.100 Documents and records system

ED Decision 2025/007/R

GENERAL

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

GM1 ORGH.DOC.100 Documents and records system

ED Decision 2025/007/R

DATA BACKUP

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

ORGH.DOC.105 Record-keeping

Regulation (EU) 2025/20

- (a) The ground handling organisation shall keep the records in accordance with the national requirements of the Member State(s) where the ground handling organisation provides its services.

- (b) Notwithstanding point (a), the ground handling organisation shall keep the following records as follows or in accordance with other applicable requirements, whichever is longer:
- (1) the ground handling organisation's declaration and the AltMoC in use, for the period of validity of the declaration;
 - (2) written arrangements with other organisations, such as aircraft operators and aerodrome operators, for the purpose of safe provision of ground handling services, for as long as such arrangements are in effect;
 - (3) the ground handling manual and any other operational procedures, aerodrome operator procedures and instructions, and aircraft operator procedures and instructions, for as long as they are used by the ground handling organisation at that aerodrome, or for that aircraft operator;
 - (4) safety assessment reports including accident and serious incident investigation reports, for the lifetime of the ground handling organisation;
 - (5) personnel training certificates, qualifications, and, as applicable, medical records, driving on the apron authorisation or its revocation or cancellation, for at least 24 months after the end of a person's employment;
 - (6) vehicle and GSE authorisations, preventive maintenance plan, and maintenance records, for at least 24 months after a vehicle is removed from operation;
 - (7) documents for the preparation and servicing of a flight, for 3 months.

ORGH.DOC.110 Ground handling manual

Regulation (EU) 2025/20

- (a) The ground handling organisation shall include the following elements in its ground handling manual:
- (1) all necessary instructions, information and procedures for the safe provision of ground handling services, 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 the ground handling organisation provides services;
 - (3) the aerodrome procedures provided by the aerodrome operator, to ensure compliance with the aerodrome requirements applicable to the ground handling organisation;
 - (4) the duties and responsibilities of the ground handling personnel;
 - (5) the ground handling organisation's management system;
 - (6) the ground handling organisation's process for the management of changes;
 - (7) the training programme of the organisation's personnel involved in ground handling activities;
 - (8) the GSE maintenance programme;
 - (9) any other tasks within the scope of ground handling services mentioned in its declaration.
- (b) The ground handling manual may consist of a set of separate documents interlinked by cross references.

- (c) Aerodrome operators and aircraft operators performing ground handling services may integrate the ground handling elements in their existing manuals.
- (d) The ground handling organisation shall ensure that any information taken from other controlled documents such as those referred to in points (a)(2) and (a)(3) or other documents that are relevant for the safe provision of ground handling services, and any amendment thereof, is correctly and timely reflected in the ground handling manual.
- (e) The ground handling organisation shall ensure that the ground handling manual:
 - (1) is approved by the responsible person(s) assigned by the ground handling organisation, either in full or per parts, and there is evidence of this approval;
 - (2) is easy to read and is organised in a manner that facilitates its preparation, use and revision;
 - (3) is easily accessible to the personnel of the ground handling organisation and to 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;
 - (4) is available, including its latest amendments, to the competent authority in due time before an inspection or audit.
- (f) The ground handling organisation shall:
 - (1) review the content of the ground handling manual periodically, ensure that it is up to date and amended whenever necessary;
 - (2) ensure that the procedures for amendment to and distribution of the ground handling manual are communicated to, and understood by, the personnel using the manual;
 - (3) develop and implement a process to manage and control the successive ground handling manual 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, the aircraft operators to which the ground handling organisation provides services, the aerodrome operator, or by changes to its operation;
 - (6) disseminate operational instructions and changes thereof, as well as any other relevant information without delay to the personnel concerned.
- (g) The ground handling organisation shall ensure that the work instructions and operational procedures match the relevant parts of the ground handling manual and are written or communicated in a language and manner that can be understood by the relevant personnel.

AMC1 ORGH.DOC.110 Ground handling manual

ED Decision 2025/007/R

GENERAL

- (a) The GH manual or parts of it may be presented in any form, including electronic form. In all cases, the GH organisation should ensure that the manual is accessible, usable and reliable.
- (b) The GH manual should be such that:
 - (1) all parts of it are consistent and compatible in form and content;

- (2) it can be easily revised;
 - (3) the parts that address GH-specific processes and activities are clearly marked or separated so as not to be confused with other parts applicable to other domains if the organisation applies an integrated management system and holds other certificates, approvals or authorisations, or declares that it performs other activities in the scope of [Regulation \(EU\) 2018/1139](#);
 - (4) its content and revision status are controlled and clearly indicated.
- (c) The GH manual should include a description of the process for its amendment and revision, specifying:
 - (1) the person(s) who may approve amendments or revisions;
 - (2) the specific conditions for temporary revisions and/or immediate amendments; and
 - (3) the methods by which all personnel and organisations, including the service providers contracted by the GH organisation and performing GH tasks, are advised of amendments to the manual.
- (d) The GH manual's content may be based on, or refer to, industry standards and good practices.
- (e) The GH manual may contain parts of, or refer to, other relevant controlled documents, such as the aerodrome manual of the aerodrome where the GH organisation provides services, other manuals, industry standards or good practice material. If the GH organisation uses material from another source, that material should either be copied and included directly in the relevant part of the GH manual or the GH manual should contain a reference to the appropriate section of that applicable material.
- (f) A translated version of the relevant parts of the GH manual is an accepted means of complying with the related relevant requirements. In any case, the persons who will use the manual or its translated parts should be able to read and understand them. The GH organisation should ensure that the translated version is always the most recent version of that document.
- (g) The content of the GH manual should be reviewed to determine any necessary updates not later than every 24 months, to ensure that it remains current.

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

ED Decision 2025/007/R

CONTENT OF THE GH MANUAL

- (a) The GH manual should cover the following main topics, either as a single document or in several documents that are cross-referenced with one another (the order and numbering of the topics may vary; other topics may be added as well):
 - (0) administration and control of the GH manual;
 - (1) management system of the GH organisation:
 - 1.1. organisational structure, including accountability and responsibilities,
 - 1.2. personnel,

- 1.3. description of the management system, including:
 - 1.3.1. SMS, including the ERP and emergency procedures of the aircraft operator(s) and aerodrome operator(s),
 - 1.3.2. management of change,
 - 1.3.3. compliance monitoring process, including an audit programme and procedure for continuing improvement,
 - 1.3.4. procedures for reporting to the competent authority and other organisations, including notifying and reporting accidents, serious incidents, occurrences and near-miss events and sharing safety-relevant information,
 - 1.3.5. procedures related to the consumption of alcohol, psychoactive substances and medicines,
 - 1.3.6. documentation and record-keeping system;
- 1.4. safety assurance of services contracted to organisations not subject to a certification or declaration scheme or an authorisation regime under an (EU) aviation regulation;
- (2) training, assessment and qualification programmes for GH personnel:
 - 2.1. identification and description of training standards and objectives,
 - 2.2. required qualifications/competencies for each GH function/role,
 - 2.3. training gap analysis — process and procedures,
 - 2.4. training and assessment programme for each GH function/role in the organisation,
 - 2.5. additional training (as defined by the GH organisation and as applicable for each GH function/role, which may be non-operational training,
 - 2.6. conditions (qualification criteria) for trainers/instructors and assessors;
- (3) standard operational procedures and other guidance or instructions for each type of GH service provided, including:
 - 3.1. procedures and instructions for the GH organisation,
 - 3.2. procedures and instructions for the aerodrome operator,
 - 3.3. procedures and instructions for the aircraft operator(s),
 - 3.4. airside safety;
- (4) GSE:
 - 4.1. operation of GSE, including safety elements,
 - 4.2. maintenance programme,
 - 4.3. maintenance and repair instructions,
 - 4.4. servicing information, troubleshooting and inspection procedures;
- (5) dangerous goods tasks and procedures for each GH function/role;
- (6) security procedures;

- (b) The standard operational procedures mentioned in paragraph 3 of the GH manual should cover the following GH operations, as applicable, depending on the services provided by the GH organisation:
- (1) passenger handling;
 - (2) baggage handling;
 - (3) aircraft servicing:
 - 3.1. safety on the apron/ramp and safety and operation of GSE and other vehicles used for GH services,
 - 3.2. hand signals for GSE,
 - 3.3. aircraft refuelling and defuelling — that is, into-plane fuelling services at the aerodrome,
 - 3.4. aircraft toilet servicing,
 - 3.5. potable water servicing,
 - 3.6. aircraft cleaning,
 - 3.7. aircraft de-icing and anti-icing,
 - 3.8. safe operations in adverse weather conditions;
 - (4) turnaround activities:
 - 4.1. aircraft arrival,
 - 4.2. aircraft chocking,
 - 4.3. aircraft coning,
 - 4.4. aircraft access doors,
 - 4.5. aircraft loading and unloading,
 - 4.6. aircraft departure,
 - 4.7. aircraft pushback,
 - 4.8. aircraft towing,
 - 4.9. long-term aircraft parking;
 - (5) load control process:
 - 5.1. principles,
 - 5.2. tasks,
 - 5.3. responsibilities,
 - 5.4. the load control process itself and operational procedures including mass and balance calculations and load planning,
 - 5.5. messaging and communication procedures,
 - 5.6. documentation;
 - (6) ground supervision;
 - (7) cargo operations.

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

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

ED Decision 2025/007/R

GH MANUAL

- (a) Organisations may use different names for this manual, as the concept is not new. Depending on the type of organisation that provides GH services, this document may have different names, such as ‘ground operations manual’, ‘operations manual’, ‘ground service manual’ and ‘ground handling service manual’.
- (b) The ‘GH manual’ is a generic name for the document or the set of documents used by the GH organisation to support it in discharging its responsibilities for the safe provision of GH services in compliance with the applicable requirements. It contains all the necessary instructions, information, policies, procedures for the provision of services, the training programme, the description of the organisation’s management system and the performance of duties by personnel, as well as for the operation and maintenance of the GSE used.
- (c) The GH organisation has full freedom to decide how the content of its GH manual is integrated into its documentation system. For example, the GH manual could be either:
- (1) a stand-alone document;
 - (2) a set of separate documents containing processes and procedures that cover its management system, with cross-references to one another; or
 - (3) integrated in another of its existing manuals.

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

ED Decision 2025/007/R

OTHER RELEVANT CONTROLLED DOCUMENTS

- (a) Other relevant controlled documents that the GH organisation may use to develop its GH manual could be those developed by various organisations, such as ICAO, the competent authorities, aerodrome operators, aircraft operators, aircraft manufacturers and GSE manufacturers, or documents such as industry standards or manuals published by industry associations and organisations.
- (b) Examples of documents that may be used:
- (1) ICAO Annexes, documents and manuals;
 - (2) the manuals of the operators of the aerodromes where the GH organisation provides services;
 - (3) aircraft operators’ operations manuals;
 - (4) de-icing manuals;
 - (5) aircraft fuelling manuals;
 - (6) aircraft manufacturers’ manuals;
 - (7) IATA documents and standards, such as but not limited to those referred to in [GM1 ORGH.GEN.125](#);

- (8) IBAC documents and standards for GH provided to business aviation operators;
- (9) SAE standards for aircraft de-icing/anti-icing on the ground;
- (10) good practice documents developed by the GH operations safety team;
- (11) operational procedures for safety stacks at aerodromes;
- (12) GSE manufacturers' manuals.

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

ED Decision 2025/007/R

ACCEPTABLE CONDITION OF A GH MANUAL

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

- (a) It is legible, the layout is clear and the content is organised in a logical way.
- (b) The text and pictures, diagrams or charts are unambiguous, leaving no room for interpretation.
- (c) The language is concise, coherent and easy to understand.
- (d) Abbreviations and acronyms are spelled out in a list in the document in which they are used.
- (e) Charts and diagrams are clear and easy to follow.
- (f) If colour codes are used, they are explained in the manual and clearly differentiated.
- (g) If any parts of the GH manual are translated, the translations do not contain operational errors that may jeopardise safety and they are up to date.
- (h) Symbols are explained.

SUBPART TRG — TRAINING OF GROUND HANDLING PERSONNEL

ORGH.TRG.100 Training and assessment programme

Regulation (EU) 2025/20

- (a) As part of its management system, the ground handling organisation shall develop and implement a training and assessment programme for its personnel, to ensure they achieve the necessary competence to perform their tasks to the standards and objectives established in accordance with point [ORGH.GEN.110](#)(c) and to ensure continued competence of personnel.
- (b) The training and assessment programme shall:
 - (1) define training standards and objectives based on the specific tasks and duties for each ground handling function, operational procedures, operational context, and the hazards and associated safety risks inherent in each ground handling function;
 - (2) establish the required level of competence and develop the training programme to achieve it;
 - (3) include a training needs analysis that is performed 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;
 - (4) cover knowledge, skills, and attitudes commensurate with the generic and specific tasks for each ground handling function as follows:
 - (i) the knowledge component shall be based on standard operational procedures related to the ground handling function, aircraft operator procedures, relevant aspects of the aerodrome procedures, and, as applicable, operations in adverse weather conditions, winter operations and night operations;
 - (ii) the skill component shall address the technical and human skills to ensure that the individual achieves the practical abilities to correctly perform the tasks specific to their role and the development of skills shall also address the operator-specific 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;
 - (5) establish a process to assess the level of achieved competence as regards the components referred to in points (2), (3) and (4), at the end of training;
 - (6) cover initial training, including on-the-job training, and continued competence training.
- (c) Taking into account the tasks and responsibilities specific to the individual functions, the training and assessment programme shall cover the following elements:
 - (1) aviation basic knowledge;
 - (2) specific training per type of ground handling activity;
 - (3) the organisation's safety management system and safety management elements;
 - (4) airside safety and working around the aircraft including hazards posed by other operators on the apron;

- (5) operation of GSE and any installation, facility or equipment provided by the aerodrome operator for the provision of ground handling services;
 - (6) human factors;
 - (7) turnaround process;
 - (8) reporting of safety events;
 - (9) dangerous goods;
 - (10) operational procedures of the aircraft operators relevant for the assigned specific ground handling function;
 - (11) local operational procedures and programmes of the aerodrome operators relevant for the specific ground handling function;
 - (12) any other training required by other applicable provisions of [Regulation \(EU\) No 139/2014](#), [Regulation \(EU\) No 965/2012](#) or [Commission Implementing Regulation \(EU\) No 923/2012](#)¹.
- (d) The ground handling organisation shall ensure, as part of its training and assessment programme, 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 ground handling organisation in accordance with point [ORGH.GEN.110](#)(c). This shall be done by conducting the types of training referred to in points (e) to (h), each concluding with an assessment phase.
- (e) Recurrent training shall be performed no later than every 36 months. 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.
- (f) Refresher training shall be performed when an individual cannot demonstrate the required competence in the assigned function or has not performed tasks in the assigned function for 3 to 12 consecutive months. The content and the delivery form of refresher training shall be adapted to the length of the pause. Refresher training may be performed also as a form of seasonal variations of activities.
- Update training shall be performed, as a subcategory of refresher training, in any of the following cases:
- (1) an individual is assigned new tasks or a new ground handling function;
 - (2) there are amendments to the regulations that directly affect the execution of their tasks;
 - (3) there are new processes, procedures, or changes to the operational environment.
- (g) Training to requalify an individual shall be performed when there are gaps in the individual's performance identified during daily operation or when an individual has not performed tasks in the assigned function for 12 to 24 consecutive months. It shall include training on the identified gaps in performance and an assessment of competence.
- (h) Retraining as per the initial training programme shall be performed when an individual has not performed tasks in the assigned function for more than 24 consecutive months.

¹ Commission Implementing Regulation (EU) No 923/2012 of 26 September 2012 laying down the common rules of the air and operational provisions regarding services and procedures in air navigation and amending Implementing Regulation (EU) No 1035/2011 and Regulations (EC) No 1265/2007, (EC) No 1794/2006, (EC) No 730/2006, (EC) No 1033/2006 and (EU) No 255/2010 ([OJ L 281, 13.10.2012](#), p. 1, ELI: http://data.europa.eu/eli/reg_impl/2012/923/oj).

- (i) The ground handling organisation shall ensure that the persons providing training and conducting the assessment are competent on the subject to be instructed and have skills to deliver the training and conduct the assessment effectively.
- (j) The training and assessment programme shall be included in the organisation's ground handling manual and shall be reviewed regularly for improvement.

AMC1 ORGH.TRG.100 Training and assessment programme

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GENERAL

- (a) The training and assessment programme should be flexible enough to cater for specific needs related to the delivery method, such as online training or classroom training.
- (b) Training and assessments may be delivered either internally by the GH organisation's qualified instructors or externally by a qualified training provider. If the delivery of the training and assessment programme is contracted to an external provider, the responsibility for the standards and quality of the programme remains entirely with the GH organisation.
- (c) The GH organisation's training and assessment programme should include the following elements:
 - (1) the process for conducting a training gap analysis and criteria to enable crediting of training received by an individual from other organisations prior to employment at the current organisation;
 - (2) defined training objectives and targets for training and assessment for the trained GH functions;
 - (3) a training and assessment plan enabling the development of knowledge, skills and attitudes (KSAs) components and ensuring error-free learning;
 - (4) standards for training material, including procedures of the aircraft operators to which GH services are provided, and progress monitoring;
 - (5) a non-punitive staff competence evaluation and a training concept based on realistic elements;
 - (6) qualification criteria as required for the trained function;
 - (7) a description of methods and intervals for recurrent assessment and subsequent retraining;
 - (8) criteria for the competence and qualifications of instructors and assessors;
 - (9) a description of procedures for evaluation of the training process; provision of feedback, including anonymous feedback; and improvement of the training process to ensure that the training objectives are met.
- (d) The knowledge and skills components of training should go hand in hand. The attitude component should be integrated as early as possible into the training process.
- (e) The training and assessment programme should reflect the daily tasks performed by the trainees. The assessment should be conducted using live or simulated operations, to confirm that the individual being trained can perform the tasks correctly.
- (f) Training and assessment using online tools should be conducted on-site to ensure the validity of the results.

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

AMC2 ORGH.TRG.100 Training and assessment programme

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ASSESSMENT

- (a) Assessments should address the required KSAs.
- (b) When conducting an operational assessment to validate or revalidate a person's competence, the individual should be assessed against the current operational procedures of the organisation. The assessment should be without error, and sufficient questions should be asked to check the underpinning knowledge of the employee.
- (c) Written evidence of an assessment should specify which elements were assessed, when they were assessed and the results of the assessment. Where the operational assessment shows a performance failure or lack of knowledge, the instructor/assessor should retrain the trainee to both correct their performance and fill any knowledge gaps.
- (d) Upon successful completion of the assessment phase, the training and assessment should conclude with the issuance of a document confirming that the trainee has successfully completed the training and is qualified for the function in which they received training.
- (e) The GH organisation should establish procedures:
 - (1) for a situation in which an individual fails the assessment;
 - (2) to ensure that the instructor/assessor reviews the incorrect answers together with the trainee in order that the trainee's knowledge is 100 % error free on leaving the learning environment.

AMC3 ORGH.TRG.100 Training and assessment programme

ED Decision 2025/007/R

TRAINING PROGRAMME FOR SMALL GH ORGANISATIONS

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

GM1 ORGH.TRG.100 Training and assessment programme

ED Decision 2025/007/R

ASSESSMENT AND ERROR-FREE LEARNING

- (a) It is recommended that some assessments be conducted in pairs or groups, to allow trainees to assess themselves by comparing themselves to others and to avoid subjective assessment. Criteria should be clearly identified to indicate when a standard has been met. For example, the correct responses to questions should be available for any assessor marking an exam.
- (b) The development and assessment of skills and attitudes within a group could be based on tasks allowing interaction during communication, workload management, problem-solving and decision-making, and teamwork.
- (c) An individual's attitude is developed and monitored along with the knowledge and skills components of training. Their attitude is closely linked to their motivation. It can be assessed based on the quality of their participation in the training or by designing exercises that require them to use attitude-related competencies, such as communication, situational awareness, problem-solving and decision-making. The attitude component monitors the development of an individual's awareness of their role in maintaining and improving safety, and in fostering a safety culture.
- (d) Error-free learning should not be understood as meaning that a trainee must pass every exam with a score of 100 %. It means that the assessor discusses the incorrect answers with the trainee to correct any misunderstandings, while their original exam mark remains unaltered. If the trainee fails an exam, they are required to complete a resit.

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

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TEMPORARY AND LEASED GH PERSONNEL

Temporary and leased GH personnel are included in the scope of point [ORGH.TRG.100](#).

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

ED Decision 2025/007/R

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

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

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

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

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

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

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

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

Step 8. Develop a feedback tool for the trainees.

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

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

ED Decision 2025/007/R

TRAINING GAP ANALYSIS AND CREDITING OF PREVIOUS TRAINING

- (a) During the training gap analysis, the GH organisation should consider the mutual recognition and crediting of the GH training and skills attained by individuals in the interest of facilitating mobility across the GH industry workforce. This mutual recognition and crediting of previous training should be based on a common training syllabus and the alignment of assessment methods and marking.
- (b) The training gap analysis should be performed to each individual before enrolling them for training.
- (c) The GH organisation should develop a procedure for crediting training received by an individual from a previous organisation. The procedure should include measures to assess the following, as a minimum, and this assessment should be stored as part of evidence of the individual's training record:
 - (1) the content of the previous training;
 - (2) whether the previous training was delivered by suitably qualified personnel or organisations;
 - (3) whether the knowledge and skills required for the execution of the operating procedures trained during the previous training were based on the same industry standards, best practices or common procedures used among several GH organisations or self-handling aircraft operators.
- (d) Evidence of an individual's previous training should be recorded where it exists.
- (e) Where previous training delivered by suitably qualified personnel or organisations is found to satisfy the training standards of the GH organisation, including the function-specific training, on-the-job and continued competence training, that previous training may be credited, and the GH organisation may apply only a differences training to cover the specific elements. Such a difference training should cover all items not credited from previous training.

- (f) The GH organisation continues to remain responsible for all the training required by Subpart [ORGH.TRG](#), regardless of whether the training is provided by itself, another GH organisation or a contracted training provider.
- (g) The GH organisation should be satisfied that at the end of the training gap analysis, crediting of previous training and, if necessary, application of differences training, the individual is competent to perform the assigned tasks in accordance with the objectives and standards established by the organisation and included in its GH manual.

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

ED Decision 2025/007/R

ON-THE-JOB TRAINING

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

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

ED Decision 2025/007/R

TRAINING COURSES BY GH ACTIVITY

- (a) GH training courses should cover the following, as applicable to the specific function and assigned tasks:
 - (1) passenger handling, including the provision of assistance to passengers with reduced mobility (PRMs):
 - (i) training required by [Regulation \(EC\) No 1107/2006](#) (applicable to PRM),
 - (ii) training on dangerous goods,
 - (iii) as applicable, training on the movement of persons on the apron in accordance with [Regulation \(EU\) No 139/2014](#); and
 - (iv) as applicable, training on the operation of equipment (ambulift, medilift, etc.) used for PRM boarding and disembarking;
 - (2) baggage handling;
 - (3) ramp handling and aircraft arrival and departure activities;
 - (4) aircraft towing/pushback;
 - (5) aircraft ground de-icing/anti-icing;
 - (6) aircraft refuelling/defuelling;
 - (7) aircraft exterior cleaning;
 - (8) potable water servicing;
 - (9) lavatory servicing;
 - (10) aircraft loading/unloading and stowage and securing of load;
 - (11) loading supervision;
 - (12) operation of GSE, operation of elevating equipment and hand signals for GSE guidance;

- (13) operation of PBBs;
 - (14) turnaround coordination, for those performing the specific turnaround coordination function and, for all GH personnel involved in GH activities on the apron during turnaround, awareness training on safety in turnaround activities;
 - (15) operation of aircraft doors (cabin and cargo compartments);
 - (16) cargo acceptance;
 - (17) handling of ULDs;
 - (18) ULD build-up;
 - (19) activities specific to cargo and mail handling not listed above;
 - (20) departure control systems and any other IT tools and equipment used by the GH organisation and required by the operational procedures of the aircraft operators;
 - (21) all-weather operations and operations in winter conditions, as applicable.
- (b) For other training courses — for example, in the areas of dangerous goods, security and vehicle driving, the intervals for recurrent training established by the relevant regulations apply.

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

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SAFETY AND SMS TRAINING

The safety and SMS training should cover the following elements:

- (a) Mitigation of safety risks in the following GH activities, as applicable:
- (1) turnaround coordination;
 - (2) aircraft chocking;
 - (3) positioning and removal of GSE;
 - (4) passenger boarding and disembarking;
 - (5) operation of aircraft doors (cabin and cargo), as applicable;
 - (6) aircraft refuelling, including the initial intervention in the event of a fuel fire, the use of fire extinguishers, and summoning of the rescue and firefighting service in the event of a fire or major fuel spill;
 - (7) aircraft loading and unloading;
 - (8) aircraft pushback/towing;
 - (9) aircraft de-icing/anti-icing.
- (b) Safety and awareness training specific to working safely on the apron and around aircraft with other GH organisations, particularly during potentially high-risk activities such as aircraft refuelling.
- (c) Knowledge of aspects of the SMS tailored to the responsibilities associated with the GH functions, with a focus on hazard identification, safety risk assessment and risk mitigation. The SMS training should include practical exercises, mainly to enable trainees to practice hazard identification and safety risk assessment, and to enhance the understanding by front-line personnel of the purpose of safety management and safety culture.

- (d) Safety culture and a just culture.
- (e) Safety reporting, including the reportable events detailed in Commission Implementing [Regulation \(EU\) 2015/1018](#). The focus should be on understanding why it is important to report safety events or near-miss events and how to use the reporting tool.
- (f) The GH organisation should also comply with the training requirements applicable to it and included in [Regulation \(EU\) No 139/2014](#), particularly point ADR.OR.D.017 and the related AMC1 ADR.OR.D.017(a);(b) and ADR.OR.D.017(c);(d) on SMS training.

AMC3 ORGH.TRG.100(c) Training and assessment programme

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TRAINING ON THE OPERATION OF EQUIPMENT, FACILITIES OR INSTALLATIONS PROVIDED BY THE AERODROME OPERATOR

- (a) All personnel using equipment, facilities or installations provided by the aerodrome operator for the provision of GH services should receive safety training relevant to their tasks for the operation of such equipment, facilities or installations.
- (b) Such equipment, facilities or installations include but are not limited to the following:
 - (1) de-icing/anti-icing facilities,
 - (2) centralised baggage handling system,
 - (3) PBBs,
 - (4) equipment for the boarding and disembarkation of PRMs.
- (c) The training for the operation of the relevant equipment, facilities or installations should be delivered in accordance with the instructions provided by the aerodrome operator or, if available, the manufacturer of that equipment, facility or installation.

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

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AWARENESS TRAINING ON AIRCRAFT REFUELLING/DEFUELLING

- (a) The GH organisation should ensure that the personnel performing various tasks around the aircraft during turnaround undergo a minimum level of safety awareness training, with a focus on safety risks of apron operations during aircraft refuelling/defuelling and the associated safety precautions.
- (b) The organisation should have means of checking that personnel understand and apply the safety precautions at all times when working around the aircraft during refuelling/defuelling.

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

ED Decision 2025/007/R

OTHER TRAINING COURSES

- (a) The training programme should include training on the following areas, as applicable to individuals' specific GH functions and assigned tasks.
 - (1) Accident/incident investigation
 - (2) Root cause analysis

- (3) Any additional training as required by the aircraft type and the type of technology and energy used for aircraft propulsion
 - (4) Ramp resource management (RRM), which is team-related training for personnel and their supervisors executing GH tasks on the apron during aircraft turnaround. The objective of this training is to ensure effective communication on the airside, the safe provision of services and effective use of all available resources — people, equipment and information — to optimise ground and flight safety and the efficiency of aircraft turnaround. Elements of RRM may be included in other GH training courses, such as those relating to human factors or safety, or RRM training may be delivered as a stand-alone course.
- (b) Other training courses that should be included in the training programme, as applicable to individuals' specific GH functions, may be required for compliance with other regulations. Examples of such courses are:
- (1) FOD, in accordance with [Regulation \(EU\) No 139/2014](#);
 - (2) airside driving, in accordance with Regulation (EU) No 139/2014;
 - (3) control of pedestrians, in accordance with Regulation (EU) No 139/2014;
 - (4) operating in low-visibility conditions and winter, in accordance with Regulation (EU) No 139/2014;
 - (5) aviation security;
 - (6) emergency response procedures, as appropriate to assigned roles and in accordance with aircraft operators' and aerodrome operators' manuals and procedures;
 - (7) various software used by GH organisations and necessary for individuals to perform their tasks in accordance with the established standards and objectives.

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

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

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

- (a) for all GH personnel performing tasks around the aircraft at the same time (during turnaround):
- (1) the work environment and the importance of situational awareness in staying safe and keeping others safe;
 - (2) the dangers of fuelling — what can go wrong during aircraft refuelling (e.g. ground damage or incidents involving hydrant pits or fuel trucks);
 - (3) fuel spillage;
 - (4) fuelling safety zone;
 - (5) how to stop a fuelling vehicle if the operator is incapacitated;
 - (6) emergency stop button;

- (b) for personnel performing tasks related to fuelling operations, in addition to the elements of point (a):
- (1) fuel knowledge and basic safety, bonding, public protection, fire classification and extinguisher types, control of access to storage areas, fire safety and misfuelling prevention;
 - (2) regular testing and checks of fuel, hoses and electrical bonding;
 - (3) procedures for ensuring fuel quality in storage or prior to refuelling (as appropriate);
 - (4) manoeuvring of elevating platforms;
 - (5) securing the fuel truck to prevent movement during fuelling;
 - (6) walkaround of the fuel vehicle before moving;
 - (7) fire extinguishers, including hand-held fire extinguisher training;
 - (8) operation of fuel truck or other equipment used for refuelling/defuelling;
 - (9) aerodromes' local procedures;
 - (10) human factors, including elements of enhancing situational awareness;
 - (11) additional elements necessary for fuelling supervisors.

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

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HUMAN FACTORS AND HUMAN PERFORMANCE

- (a) General elements guiding the design of training programmes to develop knowledge and skills in relation to human performance can be found in the *Human Factors Training Manual* (ICAO Doc 9683). However, it should be taken into account that the ICAO documents are not specifically based on the human factors in GH.
- (b) Human factors training is intended to enhance attitudes conducive to safe and efficient GH operation. The development of soft skills such as those listed below increases the likelihood of the candidate successfully completing the training programme and acquire the desired competence:
- (1) interpersonal, communication and language skills,
 - (2) ability to be a team player,
 - (3) ability to work well under pressure and manage stressful situations,
 - (4) capacity to focus and avoid distractions.
- (c) Training to develop situational awareness addresses and mitigates the incorrect or inadequate perception of individuals in an aerodrome and GH operational environment. It also addresses the risks of complacency when performing routine/repetitive tasks.

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

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

- (1) people are not good at estimating or evaluating risk;
 - (2) people who underestimate risk are more likely to take risks;
 - (3) people often overestimate their own capability or invulnerability and underestimate the severity of outcomes;
 - (4) the perception of risk becomes normalised over time.
- (d) Training objectives: In order to take appropriate action in any given situation, the individuals are expected to:
- (1) have a good understanding of the risks associated with working around aircraft;
 - (2) be able to accurately perceive risk — this involves providing a correct assessment of the likelihood and severity of the impact of a risk, which is subjective and is based on what people know and think (cognition), how they feel (emotion), and their experience, age and characteristics, and patterns of behaviour, as well as the environmental and socio-cultural context;
 - (3) understand the impact of the working environment on the cognitive processing of risk information;
 - (4) understand the difference in individual risk appetite and perception and the normalisation of risk over time.

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

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RAMP RESOURCE MANAGEMENT

- (a) RRM and communication, including language proficiency (languages used in accordance with point [GH.OPS.030](#)), use of standard terminology, hand signals, visual communication, distraction from outer sources (e.g. mobile phones) are all factors that may lead to unsafe situations in the airside operational environment if they are improperly managed or mastered.
- (b) Training on RRM is a mitigation measure to ensure the safety of GH services on the apron, in addition to the implementation of the standard operational procedures and compliance with the GSE requirements. The RRM training syllabus supporting document (NLR-TR-2012-483-tr)¹ may be used as a basis to develop RRM training elements.
- (c) The ultimate goal of RRM is to prevent aircraft accidents through reducing errors during the aircraft turnaround process and managing the effects of errors that still occur. The purpose of the RRM training is to:
 - (1) decrease the number of instances of aircraft/equipment damage and personal injuries;
 - (2) increase awareness and recognition of human factors and their effect on aircraft turnaround;

¹ Balk, A. D., Boland, E. J., Nabben, A. C., Bossenbroek, J. W., Clifton-Welker, N. et al., *Ramp Resource Management Training Syllabus Development, NLR-TR-2012-483*, Netherlands Aerospace Centre: Air Transport Safety Institute, Amsterdam, 2012, [RRM training syllabus supporting document NLR-TR-2012-483-tr | EASA](#).

- (3) improve safety barriers against human error;
 - (4) decrease disruption to operations;
 - (5) increase efficiency;
 - (6) increase individuals' awareness of being part of a larger and more efficient team.
- (d) The effectiveness of the RRM training is enhanced if it is:
- (1) based on the operational environment,
 - (2) integrated into the current HF training as much as possible,
 - (3) realistic and practical,
 - (4) scheduled outside peak hours.
- (e) The RRM training is expected to cover the following key areas of risk, which are all found in interfaces and communication between the individuals or stakeholders involved in aircraft handling activities:
- (1) between the members of a team of stakeholders involved (e.g. a loading team),
 - (2) between different stakeholders (e.g. aircrew and GH personnel, aerodrome operator personnel and GH personnel),
 - (3) between humans and technology (e.g. computerised turnaround coordination, interpretation of a docking system display),
 - (4) between humans and procedures (e.g. approaching an aircraft during the arrival process),
 - (5) between humans and the environment (e.g. weather conditions, low visibility, slippery apron).
- (e) It is recommended that the RRM training reflect the operational context at the aerodrome(s) where the GH organisation provides services. It is also recommended that the RRM training be included in or closely linked to training related to human factors.
- (f) The following learning objectives of the RRM training covering components of KSA can be used (source indicated in point (b)).

Topic	Element	Knowledge	Behaviour
Turnaround process	Turnaround process	Understanding the 'bigger' picture	Feels part of a larger process
	Type and role of actors	1. Understanding the roles and interests of other players 2. Understanding similarities and differences in interests	1. Focuses on common goals 2. Considers interests of other actors
	Dependencies/interfaces	Understanding the dependencies/interfaces between the various players/processes	1. Considers the importance of safe aircraft handling 2. Considers the limitations of other players
	Situational awareness (risk awareness)	1. Awareness of high-risk situations/areas	1. Remains alert to hazards

Topic	Element	Knowledge	Behaviour
		2. Awareness of risk consequences	2. Alerts colleagues/other organisations' personnel to hazards
	Pressures on the process	Awareness of pressures and their effect on the turnaround process	Adequately manages pressures to avoid additional hazards
Applicable regulations (safety, security)	Regulation (EU) 2025/20 Regulation (EU) No 139/2014 Regulation (EU) No 965/2012	Awareness of applicable regulations concerning the safe provision of GH services	1. Adheres to procedures 2. Motivates others to adhere to procedures
	Security	Awareness of aircraft security regulations	
Teamwork	Team dynamics	1. Knowledge of team objectives	1. Understands the team's objectives
		2. Awareness of individual and team responsibility	2. Feels responsible for team performance 3. Understands their role in the team 4. Takes the physical, emotional and mental state of other team members into account 5. Actively participates in the team's activities 6. Encourages input and feedback from others 7. Offers assistance in demanding situations
	Leadership	1. Awareness of being a role model	1. Leads by example
		2. Understanding of various leadership styles and how they affect the team 3. Understanding of elements that build the team's safety culture	2. Motivates team members to work safely 3. Takes a fair share of the team's workload 4. Applies assertive communication
Communication	1. Awareness of the importance of good communication 2. Awareness of the advantages of	1. Uses standardised communication 2. Verifies that messages are understood	

Topic	Element	Knowledge	Behaviour
		standardised communication 3. Awareness of potential communication breakdowns	3. Asks for clarification if the message is unclear
	Cultural, ethnic and educational differences	1. Understanding of cultural, ethnic and educational differences 2. Understanding of how differences may increase risk 3. Understanding of why conflicts arise and strategies to solve them	1. Treats others with respect 2. Asks for clarification when unsure 3. Speaks up when necessary 4. Clarifies misunderstandings 5. Keeps calm in conflicts 6. Suggests solutions to conflicts 7. Concentrates on what is right instead of who is right
	Team situational awareness	1. Awareness of the importance of knowing what is going on around you 2. Awareness of the condition of equipment 3. Anticipation of potential threats and errors	1. Stays aware of activities going on around them 2. Checks equipment status 3. Reacts appropriately to potential threats and errors
Threat and error management	Threat identification	Knowledge of how to identify threats	Correctly identifies threats
	Threat management	Knowledge of how to manage threats	Applies appropriate mitigation strategies for the threats and risks identified
	Error identification	Knowledge of types and consequences of errors (what can go wrong?)	1. Identifies errors 2. Reports errors without losing face
	Error management	Knowledge of how errors can be managed to reduce risks (how do you handle them?)	1. Appropriately manages errors 2. Learns from errors
Human performance and limitations	Time pressure	Knowledge of how time pressure affects human performance	1. Notices when time pressure starts to affect human performance
			2. Adequately manages time pressure

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

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

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ENSURING CONTINUED COMPETENCE BY APPLYING RECURRENT TRAINING AND RECURRENT ASSESSMENT

- (a) Recurrent training, conducted no less frequently than every 36 months, should be based on the initial training syllabus. The recurrent training should end with an assessment that acknowledges individuals' continued competence. For certain types of GH activities, recurrent training should be performed at shorter intervals. Aircraft ground de-icing/anti-icing recurrent training should be performed in accordance with SAE AS6286.
- (b) The GH organisation may also apply, when suitable for the size of its operation, recurrent assessment and subsequent retraining as a method of maintaining the competence of its personnel and ensuring that their knowledge and skills remain at the required level. A recurrent assessment is the equivalent of a proficiency check in other aviation regulations.
 - (1) When applied, the recurrent assessment should check KSAs simultaneously and should be performed at regular intervals, which are relevant to the operational context but shorter than 36 months from the previous training and assessment. A recurrent assessment does not need to cover all the tasks and responsibilities of an individual in one go; however, they should be assessed in their entirety within 36 months of the previous assessment.
 - (2) The recurrent assessment should be performed in an operational environment, during usual activities, by an appropriately trained supervisor, using a checklist based on the individual's daily tasks. The minimum score to pass a recurrent assessment and achieve competence should be 90 %.
 - (3) The GH organisation should develop checklists to be used by assessors when performing recurrent assessments. These checklists should be based on the tasks and duties associated with the function assigned to the individual being assessed and should also include or have an associated score sheet.
 - (4) Subsequent retraining following a recurrent assessment should address areas where the individual performed their tasks below the established level of competence or where their performance was uncertain or below the required standard. Providing subsequent

retraining that covers the full initial training syllabus should remain at the discretion of the supervisor and the nominated person responsible for the GH organisation's training.

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

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

ED Decision 2025/007/R

TYPES OF TRAINING FOR CONTINUED COMPETENCE

(a) Recurrent training

- (1) Recurrent training includes training in and assessment of the knowledge and skills that are necessary to perform GH tasks to the required standard.
- (2) When the GH organisation applies a recurrent assessment (or proficiency check) to ensure continued competence, the individual is informed in advance that they are subject to a recurrent assessment. The results of the recurrent assessment may lead to retraining in those areas where the individual has performed their tasks below the established level of competence, and not necessarily to full recurrent training. The results of the recurrent assessment and the subsequent retraining may serve as proof of recurrent training.

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

- (1) After a pause in the execution of tasks between 3 and 12 consecutive months or upon identifying a lower level of performance in an individual's execution of assigned tasks during a recurrent assessment. Refresher training is followed by an assessment of competence.
- (2) An individual undergoes update training when new or changed procedures or processes or amendments to the applicable regulations, which have not yet been included in the recurrent training, are implemented. The purpose is to ensure the continued competence of an individual following changes relevant to their tasks.
 - (i) Update training can be provided regardless of whether the individual has worked continually in their assigned role or has been absent for a period. The training is developed and delivered following an analysis of the impact of the changes and observing the change management process.
 - (ii) The update training can be delivered in various formats that include classroom sessions, online training, videos or formally documented briefings for employees.
 - (iii) Examples of situations in which update training should be provided are following changes to operational procedures or the introduction of a new aircraft type to be serviced, new operating systems or new GSE, or a combination of these.
- (3) Update training and on-the-job assessment are conducted in the following cases:
 - (i) when the individual has previously achieved the competence to perform a certain function but can no longer demonstrate the required competence; or

- (ii) when the individual has been absent from their operational role for between 3 and 12 consecutive months.
- (c) **Requalification training** is provided after a period of absence of between 12 and 24 consecutive months or when an individual does not perform their tasks to the established standards regardless of any interval of absence. Requalification training does not need to be identical to the initial training; only the gaps in the individual's performance should be covered. Additionally, update training should be included. Requalification training ends with an assessment of competence to ensure that the individual has achieved the same level of competence as required after initial training.

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

ED Decision 2025/007/R

RECURRENT ASSESSMENT

- (a) The recurrent assessment programme is used for meeting the following objectives:
 - (1) identify the responsibilities of the assessors and the assessment methods, tools and procedures;
 - (2) include procedures to be applied if the personnel do not perform their tasks at the required standards.
- (b) The recurrent assessment is performed during real-time activities (on-the-job performance) and is based on realistic tasks specific to the role.
- (c) The individuals being assessed are informed in advance of the date of the assessment and the expected assessment conditions.
- (d) The assessment provides anonymous and confidential results and recommendations of corrective measures.
- (e) The frequency of the recurrent assessment is driven by safety events, accident/incident reports, errors noticed or reported in the execution of operational procedures, changes to regulations or aircraft operators' manuals and the results of regular, non-punitive competence evaluations.
- (f) Recurrent assessment and retraining are documented for recording and inspection purposes.

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

ED Decision 2025/007/R

WAYS TO IMPLEMENT RECURRENT ASSESSMENT — CHECKLISTS FOR ASSESSORS

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

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

Operational assessment checklist — user guide

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

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

Qualification checklist	Employee name: Employee number:		Examiner: Employee number:	
Job title:	Module: CBLs — Conveyor belt loaders		Task: Safely operate a CBL	
Station:	Short summary:			Flight number:
Date:				Aircraft type:
Steps	Result	Details of each step		
Personal protective equipment	Choose an item: — Pass — Not yet compliant — Not checked	Show	Choose an item: — Pass ☐ — Not yet compliant ☐ — Not checked ☐	Is all PPE according to policies and/or other regulations?
		Tell	Choose an item: — Pass ☐ — Not yet compliant ☐ — Not checked ☐	Name 2–3 potential hazards while operating a CBL.
Introduction and before-use visual check	Choose an item: — Pass — Not yet compliant — Not checked	Show	Choose an item: — Pass ☐ — Not yet compliant ☐ — Not checked ☐	Is the before-use visual check performed?
		Tell	Choose an item: — Pass ☐ — Not yet compliant ☐ — Not checked ☐	Name 2–3 items to check for during the visual check before use.
				Choose an item: — Pass ☐ — Not yet compliant ☐ — Not checked ☐

Driver safety, general driving guidelines, guide person positioning, consequences of insufficient control of CBL	Choose an item: — Pass — Not yet compliant — Not checked	Show	Choose an item: — Pass ☐ — Not yet compliant ☐ — Not checked ☐	Is a guide person used for positioning the CBL?
	Choose an item: — Pass — Not yet compliant — Not checked	Tell	Choose an item: — Pass ☐ — Not yet compliant ☐ — Not checked ☐	What is the circle of safety? What is the distance? Under what circumstances are you allowed to come closer than 3 m?
Chocking requirements, trombones, aircraft hold access/exit, aircraft loading and unloading, caution, operation of a conveyor belt, guard rails, safe exit from aircraft hold, safe removal of CBL from aircraft, unattended CBL and aircraft, safe parking	Choose an item: — Pass — Not yet compliant — Not checked	Show	Choose an item: — Pass ☐ — Not yet compliant ☐ — Not checked ☐	Is a brake stop performed?
			Choose an item: — Pass ☐ — Not yet compliant ☐ — Not checked ☐	Is the CBL correctly chocked?
			Choose an item: — Pass ☐ — Not yet compliant ☐ — Not checked ☐	Loading: is the belt positioned higher than the hold?
			Choose an item: — Pass ☐ — Not yet compliant ☐ — Not checked ☐	Are the guardrails retracted before approaching the aircraft?
			Choose an item: — Pass ☐ — Not yet compliant ☐ — Not checked ☐	No person walks on the CBL while it or the belt is running.
			Choose an item: — Pass ☐ — Not yet compliant ☐ — Not checked ☐	No person jumps off the CBL.

			Choose an item:		Unloading: is the belt positioned lower than the hold?	
			— Pass	☐		
			— Not yet compliant	☐		
				Choose an item:		Is the positioning compliant with the 'no-touch' policy?
				— Pass	☐	
				— Not yet compliant	☐	
					Choose an item:	
— Pass					☐	
— Not yet compliant					☐	
Choose an item: — Pass — Not yet compliant — Not checked			Tell		Choose an item:	
	— Pass				☐	
	— Not yet compliant				☐	
	— Not checked				☐	
			Choose an item:		Why is contact with a rolling belt to be avoided?	
			— Pass	☐		
			— Not yet compliant	☐		
			— Not checked	☐		
			Choose an item:		How big should the gap between the CBL and the aircraft hold be?	
			— Pass	☐		
			— Not yet compliant	☐		
			— Not checked	☐		
			Choose an item:		What actions need to be performed on the aircraft when leaving the aircraft unattended?	
			— Pass	☐		
			— Not yet compliant	☐		
			— Not checked	☐		
			Choose an item:		What actions need to be performed on the CBL when leaving the aircraft unattended?	
			— Pass	☐		
			— Not yet compliant	☐		
			— Not checked	☐		

Regional jet awareness, adverse weather protection, APDS (35–41)	Choose an item: — Pass — Not yet compliant — Not checked	Show	Choose an item: — Pass ☐ — Not yet compliant ☐ — Not checked ☐	Are cargo and bags covered in case of rain or other bad weather influence?
	Choose an item: — Pass — Not yet compliant — Not checked	Tell	Choose an item: — Pass ☐ — Not yet compliant ☐ — Not checked ☐	What is APDS?

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

END

ANSWERS

Question/check	Answer(s)
Is all PPE according to policies and/or other regulations?	
Name 2–3 potential hazards while operating a CBL.	Low temperature, moving vehicles, pinch points, lifting, fall from height
Is the before-use visual check performed?	
Name 2–3 items to check for during the visual check before use.	According to checklist
What to do in case of observation of any non-conformity.	Do not use equipment, report non-conformity, attach an out-of-service tag
Is a guide person used for positioning the CBL?	
What is the circle of safety? What is the distance? Under what circumstances are you allowed to come closer than 3 m?	Safety zone around the aircraft to prevent accidents
Is a brake stop performed?	
Is the CBL correctly chocked?	
Loading: is the belt positioned higher than the hold?	
Are the guardrails retracted before approaching the aircraft?	
No person walks on the CBL while it or the belt is running.	
No person jumps off the CBL.	
Unloading: is the belt positioned lower than the hold?	
Is the positioning compliant with the 'no-touch' policy?	
Is the CBL parked according to the policy?	
What is the 'no-touch' policy?	Never touch the aircraft with equipment, also known as the 'no-contact rule'.
Why is contact with a rolling belt to be avoided?	Safety hazard for the hand. Hand may be caught.
How big should the gap between the CBL and the aircraft hold be?	10 cm (or 3 inches)
What actions need to be performed on the aircraft when leaving the aircraft unattended?	Doors are closed.
What actions need to be performed on the CBL when leaving the aircraft unattended?	CBL boom is fully lowered and power is off.
Are cargo and bags covered in case of rain or other bad weather influence?	
What is APDS?	A warning system that helps prevent accidents

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

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

ED Decision 2025/007/R

TRAINER AND ASSESSOR TRAINING

- (a) The GH organisation should ensure that its training programme includes minimum criteria for the competence and qualification of trainers and assessors.
- (b) The trainer and assessor functions may be performed by the same person if that person is qualified for both. However, the assessment should be conducted, whenever possible, by an assessor who was not exclusively involved in training on the same subject and of the same target group, or by a person other than the trainer.
- (c) The assessor should be able to provide feedback to the trainee and ensure error-free learning.
- (d) The persons performing recurrent assessment and on-the-job trainers should also receive appropriate training for trainers or assessors, depending on the function assigned to them.

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

ED Decision 2025/007/R

TRAINERS — QUALIFICATION AND COMPETENCE

- (a) An individual should meet the following criteria to be qualified as a GH trainer:
 - (1) be qualified and have at least 12 months' recent operational experience in the GH area in which they will deliver training;
 - (2) have adequate instructional skills, or be qualified as a trainer in line with industry best practices or, in the absence of such qualification, complete a train-the-trainer course;
 - (3) have a good performance record as a trainer or as a subject matter expert or both, and good interpersonal and communication skills;
 - (4) demonstrate familiarisation with the operational procedures applied by the GH organisation;
 - (5) whenever possible given the size of the organisation, deliver a training course under the supervision of a qualified trainer or assessor before receiving their qualification.
- (b) Once qualified, the trainer should maintain their qualification and competence as a trainer in accordance with point [ORGH.TRG.100\(i\)](#). The trainer should:
 - (1) conduct at least one training course every 24 months in the GH area in which they were qualified as trainers;
 - (2) if more than 24 months have passed since the delivery of the last training, attend refresher and update training before conducting the next course;
 - (3) complete a recurrent assessment or a refresher training not later than every 36 months in the GH area in which they conduct training.

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

- (c) An individual should meet the following criteria to be qualified as an OJT trainer:
 - (1) be qualified and have at least 12 months' recent operational experience in the GH area in which they will perform OJT;
 - (2) have good interpersonal and communication skills;

- (3) have completed training for OJT trainer, to ensure that the OJT consolidates the trainee's practical skills and attitude through error-free learning.
- (d) Once qualified, the OJT trainer should maintain their qualification and competence in the GH area of their training and as an OJT trainer. The OJT trainer should:
 - (1) conduct at least one training course every 24 months in the GH area in which they were qualified as OJT trainers;
 - (2) if more than 24 months have passed since the last OJT, attend refresher and update training before conducting the next OJT;
 - (3) complete a recurrent assessment or a recurrent training not later than every 36 months in the GH area in which they conduct OJT.

ASSESSORS — QUALIFICATION AND COMPETENCE

- (e) An individual should meet the following criteria to be qualified as an assessor:
 - (1) have at least 12 months' recent operational experience in the area in which they will conduct assessment;
 - (2) have a good performance record as an assessor and good interpersonal skills;
 - (3) have completed adequate training on the assessment phase of the training process;
 - (4) whenever possible given the size of the organisation, conduct an assessment under the supervision of a qualified assessor before receiving their qualification.
- (f) Once qualified, the assessor should maintain their qualification and competence as assessors in the GH area in which they conduct assessments. The assessor should:
 - (1) conduct at least one assessment every 24 months in the GH area in which they were qualified as assessors;
 - (2) if more than 24 months have passed since the last assessment, attend refresher and update training before conducting the next assessment;
 - (3) complete a recurrent assessment or a recurrent training not later than every 36 months in the GH area in which they conduct the assessment.
- (g) The GH organisation should have procedures for requalifying a trainer, an OJT trainer or an assessor when they do not meet the criteria for their initial qualification or for maintaining their competence.

GM1 ORGH.TRG.100(i) Training and assessment programme*ED Decision 2025/007/R***MENTORS**

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

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

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

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

(a) core tasks:

- (1) provide technical expertise:
 - (i) help with developing and maintaining competencies;
 - (ii) support the learning process;
 - (iii) promote the safety culture;
 - (iv) provide feedback;
 - (v) act as a point of contact;
- (2) promote social integration:
 - (i) share information on the purpose of the organisation;
 - (ii) communicate existing agreements and point out their importance (safety regulations, breaks, etc.);
 - (iii) promote equality by building a safe and honest relationship with the trainee;
 - (iv) guide the trainee in the organisation's network;
- (3) guide and motivate (new) employees optimally, in line with the agreed commitments;
- (4) maintain their own skills and expertise, as well as their qualifications to perform the operational skills that they mentor in;
- (5) apply means developed by the GH organisation for the execution of the mentoring function (by developing or using a checklist, information folder, etc.) in coordination with the safety manager and the supervisor.

(b) competencies:

- (1) knowledge:
 - (i) knowledge and expertise in one's own role;
 - (ii) knowledge about the structure of the organisation;
- (2) skills:
 - (i) be able to lead by example;
 - (ii) be able to listen actively;
 - (iii) be able to motivate;
 - (iv) be available;
 - (v) be able to communicate efficiently;
 - (vi) be able to recognise non-verbal signals;
 - (vii) be able to provide feedback;

- (viii) show respect;
- (ix) stimulate autonomy;
- (3) attitude:
 - (i) willing to invest time;
 - (ii) mature and experienced;
 - (iii) patient;
 - (iv) prepared to give trust;
 - (v) prepared to be co-responsible for someone's development;
 - (vi) self-confident;
 - (vii) trustworthy;
 - (viii) impartial;
 - (ix) tolerant;
 - (x) motivated.

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

ED Decision 2025/007/R

EVALUATION OF THE TRAINING PROGRAMME

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

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

ORGH.TRG.105 Additional requirements related to training

Regulation (EU) 2025/20

- (a) The ground handling organisation shall ensure that suitable facilities, means, equipment and tools are used for the delivery of training and the conduct of assessments.
- (b) The ground handling organisation shall ensure that the training material is provided in a language that can be understood by the ground handling personnel concerned.
- (c) The ground handling organisation shall maintain records of the training and assessments and associated qualifications. It shall provide a copy of such records to the individual, upon request. Such records shall include the following details:
 - (1) name of the employing organisation or, when training is provided by a third party, the organisation providing the training;
 - (2) name of training;

- (3) targeted competencies of the training;
- (4) summary of topics covered;
- (5) achieved competencies and, if applicable, grade or pass-rate of the assessment;
- (6) date of training and assessment completion.

ORGH.TRG.110 Dangerous goods training

Regulation (EU) 2025/20

- (a) Ground handling organisations, including those that do not handle dangerous goods, shall implement and maintain a dangerous goods training programme for ground handling personnel, commensurate with their functions and responsibilities and including detection of undeclared or mis-declared dangerous goods and reporting of dangerous goods events, in accordance with point [GH.OPS.020](#) and Annex 18 to the Chicago Convention and the ICAO Technical Instructions.
- (b) The personnel shall also receive training on the specific dangerous goods procedures of the aircraft operators for which the ground handling organisation provides dangerous goods handling services.
- (c) Recurrent training on dangerous goods shall be performed no later than every 24 months.
- (d) The personnel of a ground handling organisation who perform any of the following functions shall be exempted from compliance with point (a):
 - (1) aircraft refueling and defuelling;
 - (2) aircraft toilet servicing;
 - (3) potable water servicing;
 - (4) aircraft exterior cleaning;
 - (5) aircraft de-icing and anti-icing;
 - (6) aircraft towing or pushback.

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

ED Decision 2025/007/R

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

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

SUBPART GSE — GROUND SUPPORT EQUIPMENT

ORGH.GSE.100 Ground support equipment — General requirements

Regulation (EU) 2025/20

- (a) As part of its management system, the ground handling organisation shall have a process to ensure that the GSE used for the provision of ground handling services is:
 - (1) subject to an inspection prior to first use in operation or before start of seasonal operation;
 - (2) serviceable and in good condition so as not to cause any injuries to persons or damage to the aircraft or other equipment or property;
 - (3) operated in accordance with the operating instructions and within the design parameters of the equipment;
 - (4) used only for the purpose(s) for which it is designed;
 - (5) suitable to the type of aircraft for which it is used;
 - (6) maintained in accordance with the ground handling organisation's maintenance programme and instructions, with due consideration to a minimum impact on the environment.
- (b) For the purpose of point (a), the ground handling 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 operating the GSE have a valid driver's licence and any other licence required for the operation of specialised vehicles, and have been authorised by the aerodrome operator to drive on the apron, and are properly trained and their competencies are maintained;
 - (4) comply with the maintenance programme requirements laid down in point [ORGH.GSE.105](#);
 - (5) ensure, when GSE maintenance services are outsourced, that:
 - (i) 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) the ground handling organisation has GSE maintenance evidence from the outsourced GSE maintenance company;
 - (6) comply with the applicable design and manufacturing standards of the GSE used.
- (c) When the aerodrome operator provides equipment, facilities or installations for the provision of ground handling services, such as de-icing facilities, centralised baggage handling system, passenger boarding bridges and airbridges, the following aspects shall be clarified and documented as early as possible between the aerodrome operator and the users of such equipment, facilities or installations:

- (1) the responsibility for their maintenance;
- (2) the responsibility for their operation;
- (3) the responsibility for the training of personnel regarding the operation of such equipment, facilities or installations.

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

ED Decision 2025/007/R

PROVISION OF EQUIPMENT, FACILITIES OR INSTALLATIONS AND OPERATION OF GSE

- (a) When the aerodrome operator **provides** equipment, facilities or installations to be used for the provision of GH services, this does not automatically make it a GH organisation in the sense of [Commission Delegated Regulation \(EU\) 2025/20](#).
- (b) When the aerodrome operator also **operates** such equipment, facilities or installations using its own personnel, it is considered a GH organisation and Commission Delegated Regulation (EU) 2025/20 applies to it unless the aerodrome operator is eligible for an exemption in accordance with [Article 2\(3\)](#) of that Regulation.
- (c) The operation of the equipment, facilities or installations usually remains the responsibility of the GH organisation that uses them for the provision of GH services unless the aerodrome operator operates them with its own personnel.
- (d) Training on the safe operation of equipment, facilities or installations may be provided either by the aerodrome operator providing the equipment, facilities or installations or by the GH organisation, based on the instructions of the aerodrome operator.

ORGH.GSE.105 Ground support equipment maintenance programme

Regulation (EU) 2025/20

- (a) As part of its management system, the ground handling organisation shall establish and implement a maintenance programme, to maintain the systems and equipment necessary for the provision of ground handling services in a state of operation that does not impair the safety of persons, aircraft and other vehicles or equipment, and the regularity of efficiency of operations. It shall ensure the following:
 - (1) implementing a maintenance programme for its vehicles and equipment that operate on the movement area and other operational areas at the aerodrome;
 - (2) establishing procedures to implement the maintenance programme;
 - (3) performing maintenance 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) effectively implementing the maintenance programme by using appropriate and adequate means and facilities, including when maintenance services are outsourced;
 - (5) clearly tagging unserviceable vehicles and GSE as 'out of service', not using them for operations, and promptly moving them to dedicated maintenance or storage areas for repairs;

- (6) establishing a plan for preventive maintenance inspections, where appropriate;
- (7) keeping maintenance records for each vehicle and GSE.
- (b) The maintenance programme shall be adequate to the frequency and the specific conditions of use of a particular piece of 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 maintenance programme shall observe the human factors principles.
- (d) The maintenance programme shall ensure compliance with the specified service interval throughout the lifetime of the GSE.
- (e) When maintenance of the GSE is performed by other organisations participating in a pooled equipment agreement or rental agreement, the ground handling organisation shall ensure that the responsibility for the maintenance is documented.

AMC1 ORGH.GSE.105 Ground support equipment maintenance programme

ED Decision 2025/007/R

MAINTENANCE PROGRAMME

- (a) The maintenance programme of GSE should be reflected in the safety risk assessment process of the GH organisation. It should incorporate, as applicable, any relevant technical documentation developed for a particular piece of equipment and available from the equipment manufacturer, the aerodrome operator or the aircraft operator.
- (b) The maintenance programme should include regular and ad hoc inspections of GSE serviceability and should include both motorised and non-motorised GSE.
- (c) The GH organisation may develop and use checklists in support of the maintenance programme and serviceability inspections.

GM1 ORGH.GSE.105 Ground support equipment maintenance programme

ED Decision 2025/007/R

FURTHER GUIDANCE

- (a) The GSE is expected to meet existing international manufacturing standards applicable to GSE and vehicles used for aircraft and passenger handling.
- (b) ICAO Doc 10121, *Manual on Ground Handling*, contains further guidance in Section 4.5 on human factors.
- (c) The EN 12312 standards for GSE may be used.

GM2 ORGH.GSE.105 Ground support equipment maintenance programme

ED Decision 2025/007/R

FURTHER GUIDANCE ON HUMAN FACTORS IN THE MAINTENANCE OF GSE

- (a) Human conditions that may have a negative impact on the maintenance of GSE include fatigue, failure to comply with operational procedures, complacency and stress.
- (b) The maintenance of GSE is usually performed by an entity different from the GH organisation. Further guidance can be found using the following links:
 - <https://humanfactors101.com/topics/maintenance-error/>;
 - https://www.faa.gov/files/gslac/courses/content/258/1097/AMT_Handbook_Addendum_Human_Factors.pdf.

ORGH.GSE.110 Ground support equipment pooling

Regulation (EU) 2025/20

- (a) Where GSE is provided by the aerodrome operator or by another organisation at an aerodrome, the ground handling organisation may, where appropriate, enter an agreement on GSE pooling with other organisations providing ground handling services at that aerodrome. The aerodrome operator shall be kept informed of such agreement at all times.
- (b) In the case of pooled GSE, the ground handling organisation shall ensure that the specific arrangement with the organisation providing the GSE meets the requirements of this Subpart and those applicable to contracted services within 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 ground handling organisation shall effectively implement the safety requirements established through the GSE pooling agreement. It shall ensure that the level of safety is not below the standards established by its own safety management system. In such case, the ground handling organisation may request a review of the safety requirements of the GSE pooling agreement together with the other organisations involved in the agreement.

ANNEX II — PART-GH.OPS

RESPONSIBILITIES OF GROUND HANDLING ORGANISATIONS REGARDING OPERATIONAL PROCEDURES FOR GROUND HANDLING SERVICES

GH.OPS.005 General responsibilities for the provision of ground handling services

Regulation (EU) 2025/20

- (a) The ground handling organisation shall ensure, for all the ground handling activities it performs, that:
- (1) the operational procedures and the instructions provided by the aircraft operator and, when applicable, by the aerodrome operator are correctly implemented;
 - (2) sufficient personnel are available to perform the assigned tasks safely;
 - (3) the personnel performing ground handling activities are trained and competent to perform the assigned tasks;
 - (4) the operation and maintenance of any equipment used for GH activities 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 ground handling organisation shall provide services in accordance with the instructions and procedures of the aircraft operator. However, the ground handling organisation may apply its own operational procedures in either of the following cases:
- (1) if agreed and accepted by the aircraft operator;
 - (2) if the aircraft operator does not provide any operational procedures.
- (c) If the instructions and procedures provided by the aircraft operator differ from the operational procedures of the ground handling organisation, the procedures of the aircraft operator shall prevail. The ground handling organisation shall address with the aircraft operator any conflicting differences that may affect the safety of aircraft, its passengers, or the ground handling personnel as soon as they have been identified, and shall determine together with the aircraft operator whether the implementation of the operational procedures of the ground handling organisation are accepted instead.
- (d) The operational procedures of the ground handling organisation shall:
- (1) cover, as applicable, all services provided, as listed in [Article 2\(2\)](#) 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.
- (e) In accordance with point 4.1(b) of Annex VII to [Regulation \(EU\) 2018/1139](#), the ground handling organisation shall comply, to the extent relevant to the activities it carries out, with the procedures provided to it by the aerodrome operator related to the following operational aspects referred to 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 air traffic control (ATC);
 - (5) control of pedestrians;
 - (6) fuel quality and safety of apron during refuelling/defuelling;
 - (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) aircraft arrival at and departure from the stand;
 - (12) information to organisations operating at the apron;
 - (13) alerting of emergency services;
 - (14) jet blast precautions;
 - (15) high-visibility clothing.
- (f) The procedures of the aerodrome operator covering the elements in point (e) shall prevail over the procedures with the same scope of the ground handling organisation or of the aircraft operator. The ground handling organisation shall address any conflicting instructions or procedures with the aerodrome operator as soon as they have been identified.
- (g) Without prejudice to points (a) to (f), to ensure that safety of the aircraft and persons on the ground is not compromised during the provision of ground handling services, the ground handling organisation may decide to apply stricter operational procedures based on the procedures and instructions of the aircraft operator or the aerodrome operator if it considers that the local operational context requires additional safety precautions. These additional safety elements shall be documented and communicated to the aircraft operators or the aerodrome operators concerned, as applicable.
- (h) The ground handling organisation shall ensure that a copy of relevant operational instructions and procedures is available to its personnel, according to their tasks and communicated in a manner that ensures their understanding. The ground handling organisation shall also ensure that their personnel are able to understand and comply with the instructions and procedures from the aerodrome operator and/or competent authorities that might be provided only in the national language.

GH.OPS.010 Interfaces with other organisations

Regulation (EU) 2025/20

As part of its management system, the ground handling 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, based on a safety risk assessment and in agreement with all relevant stakeholders;

- (b) ensure, in coordination with the aerodrome operator, that the relevant parts of its safety management system are compatible and complementary with those of the aerodrome operator as referred to in point ADR.OR.D.025 and the aircraft operator;
- (c) ensure mutual communication and sharing of safety relevant information on a regular basis, as relevant, with the organisations affected by the ground handling activities.

AMC1 GH.OPS.010 Interfaces with other organisations

ED Decision 2025/007/R

PROCEDURES

- (a) The GH organisation should ensure that its operational procedures identify and address its interfaces with the other organisations.
- (b) The GH organisation should contribute with its own SMS and safety data to the actions initiated by the aerodrome operator to create a mitigation plan for integrated risks coming from all users of that aerodrome.
- (c) The GH organisation should apply the following steps in the identification of interfaces and to develop the necessary actions:
 - (1) identify in which of the processes and procedure there are interfaces;
 - (2) determine 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) determine 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 required.

GM1 GH.OPS.010 Interfaces with other organisations

ED Decision 2025/007/R

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

The relevant content of ICAO Doc 10121, *Manual on Ground Handling*, and other industry good practices may be used to identify and address the operational interfaces with adequate safety mitigation measures.

- (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) aerodrome 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 participates in airport collaborative decision-making (A-CDM), total airport management and

any other project where the opportunity to exchange relevant safety information is provided, as relevant to local requirements and aerodrome operators' requirements.

- (c) Safety risk management. Hazard identification and risk assessment start with the identification of all stakeholders involved in the GH activities, including independent experts and non-approved organisations. They extend to the overall control structure, assessing, in particular, the following elements across all subcontract levels and all parties within such arrangements:
- (1) clear assignment of accountability and allocation of responsibilities;
 - (2) only one party is responsible for a specific aspect of the arrangement ensuring no overlapping or conflicting responsibilities;
 - (3) applicable procedures;
 - (4) communication between all parties involved, including reporting and feedback channels;
 - (5) existence of clear lines of reporting, both for occurrence reporting and progress reporting;
 - (6) qualifications and competencies of key personnel;
 - (7) possibility for GH personnel to directly notify the aircraft operator or aerodrome operator of any hazard whose consequences would result in an obviously unacceptable safety risk.
- (d) Guidance on establishing operational interfaces can be found in ICAO Doc 10121, *Manual on Ground Handling*.

GM2 GH.OPS.010 Interfaces with other organisations

ED Decision 2025/007/R

SAFETY-CRITICAL GH FUNCTIONS

The following GH functions are considered to be safety critical; the list is not exhaustive, as the GH organisation may include functions other than the ones below:

- (a) loading supervision;
- (b) aircraft loading/unloading;
- (c) operation of GSE including passenger stairs, PBBs, airbridges and cargo loaders;
- (d) aircraft towing and pushback;
- (e) aircraft arrival and departure activities;
- (f) turnaround coordination;
- (g) fuelling operations;
- (h) de-icing/anti-icing operations;
- (i) functions that require the handling of dangerous goods on the apron, in the cargo warehouse, during aircraft loading or for load planning.

GM3 GH.OPS.010 Interfaces with other organisations

ED Decision 2025/007/R

RESPONSIBILITIES OF INDIVIDUAL STAKEHOLDERS INVOLVED IN THE SAME GH ACTIVITIES

- (a) It is recommended that if the operating procedures developed and implemented by the GH organisation for a particular GH service conflict with the procedures developed by the aerodrome operator or the aircraft operator, the GH organisation discuss those procedures with the other organisation and, if necessary, perform a safety risk assessment, which should ultimately lead to a commonly agreed version of the procedures to be applied to that specific GH service.
- (b) The purpose of having the organisations concerned address together any conflicting procedures is to ensure the safest and most efficient way of applying those procedures, by harmonising them as much as possible for each aircraft type/family, and minimising the number of deviations from the applicable standards and good practices.
- (c) Examples of procedures to which this may apply are procedures for aircraft handling in adverse weather conditions, passenger boarding or disembarkation using pedestrian walkways, or aircraft refuelling operations, which involve the aerodrome operator, the aircraft operator, and the GH organisation providing refuelling services.

GM4 GH.OPS.010 Interfaces with other organisations

ED Decision 2025/007/R

INTERFACES BETWEEN GH ORGANISATIONS, AIRCRAFT OPERATORS AND AERODROME OPERATORS

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

Activity	GH organisation	Aerodrome operator	Aircraft operator
Walking and working airside	1. Ensure that training is in place and compliance by its personnel with the general safety policies and procedures of the aerodrome and aircraft operators. 2. Assess local risks and job tasks to identify any additional personal protective equipment (PPE) required, such as high-visibility clothing, safety shoes or boots, clothing appropriate for the weather, gloves, face protection or safety goggles. 3. Observe national regulations on health and safety.	1. Set out the overall design and operation of the airside areas. 2. Set out and ensure the application of general safety policies and procedures such as access to airside, apron discipline and use of PPE.	1. Set out 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. Have a procedure for ensuring aircraft turnaround safety.
Vehicle and equipment operation	1. Ensure that personnel are trained and competent in operating the vehicles and equipment, in accordance	1. Develop rules for the operation of vehicles on the apron, including a	—

Activity	GH organisation	Aerodrome operator	Aircraft operator
	with the manufacturers and aircraft operators' and aerodrome operators' requirements. - Ensure that the organisation's vehicles and personnel comply with the aerodrome's driving rules. - Use a guide person when positioning equipment when operational procedures require this. - Ensure that the vehicles are operated and maintained in accordance with aircraft manufacturers' specifications, where these are provided. - Ensure that vehicle/equipment maintenance schedules are followed and that serviceability checks are conducted.	formal driver training, assessment and licensing scheme for all drivers operating in the movement area. - Develop an agreed set of minimum standards for the condition and maintenance of airside vehicles, aligned with Commission Delegated Regulation (EU) 2025/20. - May perform regular vehicle checks. - Issue an airside vehicle permit for any vehicle operating airside.	
FOD	- Participate in the aerodrome operator's and aircraft operators' FOD management programmes and encourage all personnel to adhere to them. - Supervisors should constantly be aware of the potential for FOD and be knowledgeable of their area of responsibility and ensure that personnel are aware of and participate in FOD prevention programme efforts. - 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.	Develop a comprehensive FOD management programme, including detection, prevention and evaluation of FOD at the airport.	Provide awareness training for personnel on the hazards of FOD to aircraft and individuals.
Equipment approaching the aircraft	Ensure that personnel are trained according to the operational procedures and instructions provided by the aircraft operators.		Define the rules to be followed for all equipment approaching the aircraft, including with regard to speed, brake checks, situations

Activity	GH organisation	Aerodrome operator	Aircraft operator
	2. Ensure that GSE servicing the aircraft is serviceable. 3. Ensure that the GSE does not make 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 GH 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 that interfaces with the aircraft passenger doors should have platforms of sufficient width to allow the aircraft doors to be opened/closed with the equipment in place and the safety rails deployed. 7. When positioning equipment (GSE) , use a guide person as per the operational procedures in the GH manual. Ensure that the guide person, when used, is in a position where they can accurately judge clearances and communicate signals to the driver/operator. Stop immediately when visual contact with the guide person is lost. 8. A guide person is not required if the equipment is fitted with systems (e.g. sensors) that enable the operator to accurately judge clearances and properly move the equipment to and from the aircraft.		where a guide person is needed, clearance from the fuselage and equipment chocking.
General safety during aircraft fuelling operations	1. Ensure that personnel are aware of and take precautions during fuelling operations, regarding the use of portable electronic	Ensure that all personnel working in apron areas are aware of the safety requirements of	1. Develop policies and procedures for basic safety during fuelling, including precautions for

Activity	GH organisation	Aerodrome operator	Aircraft operator
	devices and sources of ignition, and the connection of electrical equipment to the aircraft (e.g. by observing the safety zones and parking restrictions and following emergency procedures in response to fuel spillage). 2. Provide specific training to personnel on safety measures applicable during fuelling with passengers on board. 3. Verify the application of safety measures, in particular the provision of clear areas for the deployment of evacuation slides. 4. Apply the aerodrome's procedure for safety on the apron during fuelling operations as per Regulation (EU) No 139/2014.	Regulation (EU) No 139/2014 on safety on the apron during aircraft fuelling and defuelling operations.	fuelling with passengers on board. 2. Determine aircraft emergency exits 3. Clarify permission to board or disembark passengers, including PRMs, during refuelling 4. Ensure that the operator's procedures do not contradict the aerodrome's procedures for the safety of apron operations during fuelling.
Adverse weather conditions	Ensure that the personnel are aware of hazards and precautions to take during adverse weather conditions and that notice of these conditions is communicated to front-line personnel in an effective and timely manner.	1. Establish procedures to ensure the safety of aerodrome operations in adverse weather conditions and ensure that 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 operations, such as low visibility.	1. Develop policies and procedures for the GH of aircraft during adverse weather conditions.
General awareness of dangerous goods	1. Ensure that the personnel are qualified to identify, handle and load dangerous goods as required by their operational responsibilities.	Have procedures in place to respond to incidents involving dangerous goods.	Develop policies and procedures for the carriage of dangerous goods on aircraft.

Activity	GH organisation	Aerodrome operator	Aircraft operator
	2. Have procedures to ensure that incidents and accidents involving dangerous goods are reported as required.		
Turnaround coordination	1. Ensure turnaround coordination and apply the aircraft operator's turnaround plan. 2. A turnaround coordination function should facilitate adherence to the plan.		Aircraft operators should provide the GH organisation with a turnaround plan.
Load planning	Execute load planning in accordance with the aircraft operator's procedures and instructions, when this service is outsourced.		1. Develop procedures in accordance with the air operations requirements to include mass and balance calculations, load planning, production of a load instruction/report, finalisation of a load sheet, last-minute changes and special load NOTOC, as applicable. 2. Ensure that any verbally received load information, which could affect aircraft mass and balance, is documented and communicated to the person responsible for final calculation of mass and balance prior to each flight. 3. Provide instructions for aircraft loading and unloading for each aircraft type.
Aircraft arrival	1. Position the personnel performing the turnaround away from hazard zones. 2. GSE required for aircraft handling should be available, serviceable and positioned well clear of the aircraft path, normally outside the equipment restraint area.	1. Ensure that the allocated stand is serviceable and suitable for the aircraft characteristics. 2. Communicate to the GH organisation the initially allocated stand and any	1. Ensure that the phraseology, signals and procedures regarding communication between GH organisation personnel and flight deck for arrival are established (for marshalling,

Activity	GH organisation	Aerodrome operator	Aircraft operator
	3. Personnel in charge of arrival should conduct a FOD check on the 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 a marshalling service, it should be performed in accordance with the aerodrome operator's procedures. 6. Standard hand signals and agreed phraseology (if applicable) should be used for all communication between flight crew and ground personnel in accordance with Part-SERA. 7. Marshallers and wing walkers should be distinguishable to the flight crew and utilise during daytime operations either wands or mitts of a highly visible colour and during low-visibility conditions/ night-time operations lighted wands. 8. Ensure that personnel understand the use of aircraft anti-collision lights. When an aircraft has an unserviceable auxiliary power unit (APU), specific procedures should be followed to connect the ground power prior to anti-collision lights being switched off. 9. Ensure that the 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 it has come to a complete stop. Personnel should notify the flight deck crew	changes in a timely manner. 3. When aircraft marshalling is performed by an apron management service provider or aerodrome operator, establish clear procedures for handover of parked aircraft to the GH organisation for the necessary GH services.	pushback and towing in accordance with Part-SERA), practised and used by flight crew when communicating with GH personnel and vice versa. 2. Ensure that procedures for aircraft ground movement are established, including actions before arrival, standard arrival procedure, use of GSE, danger areas and backup communications.

Activity	GH organisation	Aerodrome operator	Aircraft operator
	when the chocks have been inserted.		
PBBs and passenger stairs	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.	1. Make available training standards and procedures for the use of each type of PBB operated at the airport. 2. Ensure that any third-party operating a PBB is trained to do so in accordance with the established training programme.	Develop policies and procedures for the use of PBBs and stairs on the operator's aircraft, including operation of doors and communication with the cabin crew.
Ground power and pre-conditioned air units	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.	1. Make available training material and procedures for the use 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's requirements. 3. Ensure that any equipment that is inoperable is removed from service immediately and that users are notified.	Develop policies and procedures for the use of ground power and pre-conditioned air on the operator's aircraft, including sequencing and communication with the flight and cabin crew.
Loading and unloading	Ensure that personnel assigned to perform loading and unloading functions are properly trained and qualified. Training includes manual handling, understanding of loading instruction forms and loading reports, reporting of the final load (including deviations), last-minute changes, ULD serviceability, aircraft hold inspection, tipping tendency.	Ensure that ULDs can be stored in a safe and convenient place within the airport area.	Develop policies and procedures for the loading and unloading of the aircraft, which may include the operation of cargo doors, load classifications and priorities, sequencing, load securing, special precautions for fire detection systems in the aircraft hold and special loads such as live

Activity	GH organisation	Aerodrome operator	Aircraft operator
			animals, dangerous goods, urgently required aircraft parts and other aircraft operator materials.
Elevating equipment (for cargo and catering loading/unloading)	Ensure that personnel operating elevating equipment are qualified to do so and familiar with the features of the equipment they are operating.		Develop policies and procedures regarding proximity restrictions; door operation; the use of elevating equipment on the aircraft; the use of chocks/stabilisers.
Toilet and potable water servicing	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.	Develop policies and procedures for toilet and water servicing, including liquid quantities required for specific aircraft potable water and toilet configurations.
Air start units	Ensure that personnel performing air start procedures are trained and qualified to do so and familiar with the features of the equipment they are operating. Training includes precautions that should be taken to ensure correct and safe connection to the aircraft and operator communication with the flight crew and other team members.	In the case of air start engine start-up on the stand, establish special precautions regarding jet blast.	Establish policies and procedures for the use of an air start unit on the aircraft.
Aircraft departure	1. Ensure protection against jet blast and engine ingestion effects. 2. Ensure that personnel performing aircraft departure procedures are trained and qualified for the method being utilised (pushback, taxi-out or power back) and familiar	1. Ensure protection against jet blast and engine ingestion effects are in place, where applicable. 2. In coordination with air navigation services and apron management	1. Develop policies and procedures for the safe departure of the operator's aircraft from the stand. 2. Ensure that phraseology, signals and procedures for communication between ground and

Activity	GH organisation	Aerodrome operator	Aircraft operator
	with the features of any equipment they are operating. Training includes: - aircraft pre-departure inspection; - pre-departure stand checking, including FOD inspection; - use and removal of aircraft steering bypass pin; - maximum gear turn limits; - airport infrastructure limitations.	services, consider the development of standard pushback procedures for the movement of aircraft on aprons and taxiways.	flight deck related to departure are established, practised and used by flight crew when communicating with ground crew and vice versa.
Aircraft towing/pushback	- Ensure that personnel performing towing/pushback procedures are qualified to do so and are familiar with the features of any equipment they are operating. - Ensure proper linking with the apron management service provider. Ensure compliance with the applicable SERA requirements. - Ensure that personnel are aware of aerodrome/air traffic control rules for the specific routes being used.	- Consider developing standard aircraft towing routes and procedures in coordination with air navigation services and apron management services. - Ensure the use of anti-collision lights and communication with air traffic control for movements on aprons and taxiways.	Develop policies and procedures for towing of aircraft, including: - type of towing equipment suitable for aircraft type; - connection and disconnection of equipment to and from the aircraft; - communication between the ground and the flight deck; - use of anti-collision lights (as per Part-SERA) and emergency procedures.
Aircraft de-icing and anti-icing	- Ensure that personnel performing aircraft de-icing and anti-icing procedures are qualified to do so and are familiar with the procedures applicable to fluids or forced air operations and any equipment they are operating. - 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 required	- Define the location and facilities used for aircraft de-icing and anti-icing at the airport. - Develop or ensure that procedures are in place for the collection and safe disposal of de-icing and anti-icing fluids.	- Develop policies and procedures for de-icing and anti-icing, including methods, types of fluids to be used, restrictions on the application of the fluids, communication between flight crew and de-icing personnel, and reference to holdover time. - Agree and notify GH organisation about who will conduct the post de-icing check.

Activity	GH organisation	Aerodrome operator	Aircraft operator
	specifications prior to being used in operations. 3. Receive and apply instructions from the aircraft operator about who will conduct the post de-icing check. 4. Ensure that when storing or handling de-icing/anti-icing fluid, pre-season, receipt and other required quality assurance checks are performed.		3. Ultimate responsibility for the aircraft remains with the commander/ pilot-in-command, as per Regulation(EU) No 965/2012.

GH.OPS.020 Handling of dangerous goods

Regulation (EU) 2025/20

- (a) The ground handling organisation shall ensure that the handling of dangerous goods is performed at all times in accordance with the relevant provisions of Annex 18 to the Chicago Convention and the ICAO Technical Instructions relating to that Annex, and the instructions and procedures of the aircraft operator.
- (b) Ground handling organisations not involved in the handling of dangerous goods shall refuse goods containing hidden or undeclared dangerous goods and shall report the detection of undeclared or mis-declared dangerous goods in accordance with point [ORGH.GEN.160\(b\)\(2\)](#).
- (c) The ground handling organisation shall ensure that the personnel involved in the handling of dangerous goods have access to and apply the variations specific to the aircraft operators to which the services are provided.

GH.OPS.025 Ground transportation of passengers and crew members by an aerodrome operator

Regulation (EU) 2025/20

When an aerodrome operator provides ground transportation services for passengers and crew members with its own personnel, either as a single service or cumulated with the handling of passengers with reduced mobility, as part of the exemption specified in [Article 2\(3\)\(h\)](#) or (j) of this Regulation, it shall comply with the following requirements of [Annex I](#) and [Annex II](#) to this Regulation:

- (a) Subpart [ORGH.GSE](#);
- (b) point [GH.OPS.300](#);
- (c) point [GH.OPS.305](#).

GH.OPS.030 Common language

Regulation (EU) 2025/20

The ground handling organisation shall ensure that its personnel are able to communicate effectively for their daily operational tasks in the language(s) or hand signals that can be understood among themselves or, depending on their assigned functions, by the aerodrome personnel or the aircrew.

AMC1 GH.OPS.030 Common language

ED Decision 2025/007/R

LANGUAGE OF COMMUNICATION IN DAILY OPERATIONS

GH operational personnel should be able to communicate effectively among themselves, and with the aerodrome operator personnel and the flight crew, depending on their assigned function. Their level of knowledge of the language used should enable individuals to perform their daily tasks as established through the GH organisation's GH manual and the relevant safety procedures.

GM1 GH.OPS.030 Common language

ED Decision 2025/007/R

OPERATIONAL USE OF COMMON LANGUAGE

- (a) GH operational personnel is expected to be able to communicate effectively in a job-related context, to handle normal, abnormal and emergency situations and conduct non-routine coordination with colleagues and other operational personnel of the aerodrome or flight crews, regardless of the language used.
- (b) GH personnel whose daily operational tasks include communication with flight crews are expected to be able to communicate effectively in English on operational matters related to their function. Derogations approved or issued by the competent authority in accordance with [Regulation \(EU\) No 139/2014](#) remain valid and prevail over this GM.
- (c) The following GH functions are subject to point (b) (this list is for guidance purposes, and the GH organisation may decide to consider other GH functions as well; in addition, the aerodrome operator's instructions on the language to be used will be complied with):
 - (1) aircraft towing and pushback,
 - (2) fuelling operations,
 - (3) aircraft de-icing/anti-icing operations,
 - (4) turnaround coordination,
 - (5) loading supervision.
- (d) A person's ability to communicate effectively in an operational context could be demonstrated as follows:
 - (1) ability to communicate on common and work-related topics with accuracy and clarity;
 - (2) ability to use appropriate communication methods to exchange messages and to recognise and resolve misunderstandings in a general or work-related context;
 - (3) ability to linguistically handle a complication that may occur during a routine work situation or a communication task with which they are otherwise familiar.

SUBPART 1 — PASSENGER HANDLING

GH.OPS.100 Passenger handling — general requirements

Regulation (EU) 2025/20

- (a) The passenger handling procedures established by the ground handling organisation shall cover the safety risks, including carriage of dangerous goods in passenger baggage or on the person, related to the following activities:
 - (1) passenger and baggage acceptance and data transmission for load control purposes;
 - (2) handling of special categories of passengers, including passengers with reduced mobility;
 - (3) passenger boarding;
 - (4) passenger disembarkation, including, if applicable, handling of transit and transfer passengers;
 - (5) passenger transfer or transit.
- (b) The ground handling organisation shall ensure that the aerodrome requirements related to the control of pedestrians are observed during passenger boarding and disembarkation.

AMC1 GH.OPS.100 Passenger handling — general requirements

ED Decision 2025/007/R

SAFETY RISK MITIGATION MEASURES FOR CHANGES IN THE AIRCRAFT'S CENTRE OF GRAVITY DURING PASSENGER BOARDING OR DISEMBARKATION

Changes in the aircraft's centre of gravity during boarding/disembarkation may lead to the aircraft's nose lifting up, causing issues and potential injuries to passengers/aircrew, damage to the GSE docked to the aircraft or aircraft tail tipping.

- (a) The operational procedure for passenger boarding and disembarkation should cover the following key risk areas, as a minimum:
 - (1) aircraft damage by the GSE docked to the aircraft (PBBs, passenger stairs);
 - (2) aircraft tail tipping;
 - (3) movement of the aircraft's centre of gravity too far aft;
 - (4) passengers and aircrew getting injured due to aircraft pitch angle changes;
 - (5) damage to the GSE docked to the aircraft.
- (b) The operational procedure for passenger boarding and disembarkation should consider synchronising cargo loading/unloading with passenger boarding/disembarkation to maintain a forward centre of gravity.
- (c) The turnaround coordinator, the person monitoring passenger boarding and disembarkation, and the aircraft loading personnel should be trained to recognise early signs of the aircraft's centre of gravity moving too far aft and take the required corrective actions.

AMC2 GH.OPS.100 Passenger handling — general requirements

ED Decision 2025/007/R

PASSENGER HANDLING — PASSENGERS WITH REDUCED MOBILITY

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

GM1 GH.OPS.100 Passenger handling — general requirements

ED Decision 2025/007/R

PASSENGERS WITH REDUCED MOBILITY

- (a) The responsibility to ensure the provision of assistance to PRMs or passengers with disabilities at an aerodrome remains with the aerodrome operator, in accordance [with Regulation \(EC\) No 1107/2006](#). That Regulation also specifies the possibility that assistance services are provided by the aerodrome operator or contracted to another provider.
- (b) Likewise, the responsibility for adequate training of personnel remains with the aerodrome operator, as specified by Regulation (EC) No 1107/2006.
- (c) Additional guidelines may be found in the European Civil Aviation Conference's Code of good conduct in ground handling for persons with reduced mobility¹ and its *Policy statement in the field of civil aviation facilitation*² (Doc 30, Part I, Section 5).

GM1 GH.OPS.100(a) Passenger handling — general requirements

ED Decision 2025/007/R

GROUND TRANSPORT OF PASSENGERS

To demonstrate compliance with Commission Delegated Regulation (EU) 2025/20 when providing services related to ground transport of passengers, the GH organisation is expected to prove compliance with the following:

- (a) inclusion of this activity in its SMS in accordance with point [ORGH.MGM.200](#);
- (b) implementation of the applicable requirements of Subpart [ORGH.GSE](#);
- (c) compliance with the applicable requirements of [Regulation \(EU\) No 139/2014](#) regarding the authorisation of vehicle drivers and their training, authorisation of vehicles, operation of vehicles, and marking and lighting of vehicles.

AMC1 GH.OPS.100(b) Passenger handling — general requirements

ED Decision 2025/007/R

SAFETY RISK MITIGATION MEASURES FOR PASSENGERS ON THE APRON DURING BOARDING AND DISEMBARKATION

The walkways process should not be conducted:

- (a) when the aircraft is being refuelled simultaneously with passenger boarding in the adjacent stand of the passenger boarding side;
- (b) adverse weather conditions (thunderstorms, lightning, snow/ice, strong winds, heavy rain, fog, etc.) are anticipated or prevailing over the airport (the aerodrome procedures also apply for these conditions);
- (c) an emergency situation is in progress.

¹ European Civil Aviation Conference, *Code of good conduct in ground handling for persons with reduced mobility*, 2003, https://www.ecac-ceac.org/images/documents/ECAC_Code_of_Conduct_Ground_Handling_for_Persons_with_Reduced_Mobility_2003.pdf.

² ECAC.CEAC DOC 30, Part I, *ECAC Policy Statement In The Field Of Civil Aviation Facilitation*, 2023, 13th edition, https://www.ecac-ceac.org/images/activities/facilitation/ECAC-Doc_30_Part_I_Facilitation_13th_edition_13_Dec_2023.pdf.

GM1 GH.OPS.100(b) Passenger handling — general requirements

ED Decision 2025/007/R

MITIGATION MEASURES TO ENSURE SAFETY OF PASSENGERS ON THE APRON DURING BOARDING AND DISEMBARKATION

The GH organisation may apply mitigation measures such as:

- (a) assignment of an adequate number of GH personnel to monitor passenger movement on the apron;
- (b) use of markings and a walking path for pedestrians.

GH.OPS.105 Control of passengers on the apron

Regulation (EU) 2025/20

- (a) Passenger access on the apron or any other operational area shall observe the applicable requirements on control of pedestrians laid down in [Regulation \(EU\) No 139/2014](#). The ground handling organisation shall ensure that the passengers do not move outside the clearly designated/marked area or path for passage between the aerodrome terminal and the aircraft and do not cross the marked aircraft danger zones.
- (b) The ground handling organisation shall apply the aircraft operator instructions and procedures unless agreed differently with the aircraft operator. When using passenger stairs, passenger boarding bridges or airbridges for passenger boarding and disembarkation, the operational procedures shall cover the safety of passengers during passenger boarding and disembarkation.

GH.OPS.110 Handling of passengers with reduced mobility by an aerodrome operator

Regulation (EU) 2025/20

When an aerodrome operator performs handling of passengers with reduced mobility with its own personnel, either as a single service or cumulated with the ground transportation of passengers and crew members, as part of the exemption specified in [Article 2\(3\)\(h\)](#) or [\(j\)](#) of this Regulation, it shall comply with the following requirements of [Annexes I](#) and [II](#) to this Regulation:

- (a) Subpart [ORGH.GSE](#);
- (b) point [GH.OPS.100\(a\)\(2\)](#) applicable to those passengers;
- (c) point [GH.OPS.305](#) on the operation of GSE.

SUBPART 2 — BAGGAGE HANDLING

GH.OPS.200 Baggage handling — general requirements

Regulation (EU) 2025/20

- (a) The safety procedures for baggage handling shall cover the following phases, depending on the range of operations of the ground handling organisation:
 - (1) baggage identification;
 - (2) baggage sorting;
 - (3) baggage building, preparation for departure or transfer;
 - (4) baggage arrival and reclaim.
- (b) The handling of dangerous goods in baggage shall be performed in accordance with Annex 18 to the Chicago Convention and the ICAO Technical Instructions relating to that Annex and the aircraft operator's procedures and instructions regarding dangerous goods in passenger baggage.
- (c) The ground handling organisation shall comply with any additional aerodrome procedures, depending on the centralised infrastructure provided by the aerodrome operator for baggage handling.
- (d) The ground handling organisation shall ensure that the personnel involved in baggage handling receive safety training relevant to their tasks and understand the consequences of their performance on the flight safety.

SUBPART 3 — AIRCRAFT SERVICING

GH.OPS.300 Safety on the apron

Regulation (EU) 2025/20

The ground handling organisation shall implement, besides aerodrome operator procedures applicable to that organisation as aerodrome user, operational procedures to cover the safety risks of working around the aircraft and on the aerodrome airside safety area, as follows:

- (a) the aerodrome operator's procedures regarding the following activities:
 - (1) walking and driving within the aerodrome airside areas;
 - (2) FOD programme;
 - (3) driving on the movement area;
 - (4) operations in adverse weather conditions, in winter or at night;
- (b) the ground handling organisation's operational procedures regarding the following activities:
 - (1) working on the apron and around the aircraft and safety on the apron;
 - (2) inspection of aircraft exterior and adjacent airside areas, as appropriate, prior to aircraft arrival and departure;
 - (3) working around the aircraft, whereby the following principles shall apply:
 - (i) aircraft danger areas shall be kept clear of persons and vehicles while engines are about to be started or are running;
 - (ii) personnel, other than those required to assist the arrival and departure of the aircraft, shall not approach the aircraft when the engines are running and the anti-collision lights are turned on;
 - (iii) the procedure shall include human factors principles;
 - (4) correct positioning of the ground support equipment around the aircraft for aircraft servicing and passenger boarding and disembarkation;
 - (5) depending on the responsibilities assigned to the organisation, either of the following:
 - (i) develop and implement an aircraft turnaround plan to ensure coordination and safety of all ground handling 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 aircraft turnaround plan is developed by another organisation.
- (c) The operational procedures referred to in point (b) shall be adapted to the operational context of the aerodrome, as well as its specific geographical and weather conditions.

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

ED Decision 2025/007/R

SAFETY RISK MITIGATION MEASURES FOR PERSONNEL MOVING AROUND THE AIRCRAFT DURING TURNAROUND

When the aircraft engines are running or the aircraft is about to move and the anti-collision light is on:

- (a) the operational procedures and safety training should cover the safety risks of the following activities:
 - (1) chocking of aircraft;
 - (2) provision of ground power unit when the aircraft's auxiliary power unit is inoperative;
 - (3) other circumstances explicitly described in the GH organisation's GH manual;
- (b) the operational procedures should provide mitigation measures for the following safety risk areas as a minimum:
 - (1) inoperative beacon or beacon not turned on — proper communication between cockpit and ground or an alternative procedure should be ensured;
 - (2) use of beacon lights by the flight crew other than for the intended purpose when the startup clearance is given by air traffic control but the GH operations tasks have not been completed;
 - (3) poor communication between the flight crew and the GH persons before the aircraft doors open/close;
 - (4) insufficient chocking or poor communication leading to aircraft rolling unintentionally;
 - (5) lack of signal for 'aircraft under movement', as the beacon is only intended for 'engine running', posing risk during pushback/towing operations — an additional signal for 'aircraft under movement' should be established and communicated to the personnel involved;
 - (6) lack of coordination between GSE operators/drivers during aircraft turnaround (fuelling, catering, PRM handling, etc.);
 - (7) securing of GSE.

GH.OPS.305 General requirements for the operation of ground support equipment

Regulation (EU) 2025/20

- (a) The ground handling organisation shall implement procedures for the safe operation of GSE, with specific safety actions to address the risk of equipment approaching, positioning, braking, manoeuvring, parking, departing from the aircraft and the area where the aircraft is being serviced, including the equipment used for the ground transportation of passengers with reduced mobility, as well as equipment securing when not in use and parking in designated areas.
- (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 shall comply with the maintenance programme referred to in Subpart [ORGH.GSE](#) of Annex I 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, passenger boarding or disembarking.
- (d) A no-touch policy shall be applied unless the GSE is equipped with proximity or self-levelling sensors, depending on the GSE type, or in specifically accepted circumstances required by the type of the GSE in operation.

AMC1 GH.OPS.305 General requirements for the operation of ground support equipment

ED Decision 2025/007/R

SAFETY RISK MITIGATION MEASURES FOR THE OPERATION OF PASSENGER BOARDING BRIDGES

- (a) The operation of PBBs, if done incorrectly, may lead to collisions between aircraft and PBBs or injuries to personnel or passengers.
- (b) The operational procedures and training should mitigate the safety risks arising from the following situations (the list is not exhaustive):
 - (1) operating new or different models of PBBs, with possible differences in the control panel;
 - (2) operating PBBs with many different instructions provided by various aircraft operators (various gap requirements and touch/no-touch policies);
 - (3) operating multiple PBBs for the same aircraft.
- (c) Training of personnel operating the PBBs should include identification of malfunctions and recognition of sensors indicating issues with their serviceability.
- (d) PBBs should be parked in the designated areas and secured on the ground against unintended movement.
- (e) At aerodromes where the aerodrome operator provides the procedures for PBB operation, the GH organisation operating PBBs should comply with those procedures.

AMC2 GH.OPS.305 General requirements for the operation of ground support equipment

ED Decision 2025/007/R

USE OF A GUIDE PERSON

- (a) A guide person should be used when positioning the GSE against the aircraft where the view of the driver is or may be obstructed.
- (b) The procedure for the operation of GSE when using a guide person should ensure the following aspects, as a minimum:
 - (1) the guide person is in a position to accurately judge clearances and communicate signals to the driver/operator;
 - (2) operation is stopped immediately when visual contact with the guide person is lost.
- (c) The GH organisation should apply mitigation measures to ensure the safety of the guide person.

- (d) A guide person is not necessary if the GSE is equipped with systems (e.g. sensors) that enable the operator to accurately judge clearances and properly move it to and from the aircraft.

AMC3 GH.OPS.305 General requirements for the operation of ground support equipment

ED Decision 2025/007/R

SAFETY RISK MITIGATION MEASURES FOR THE OPERATION OF GSE

- (a) Correct operation of motorised/non-motorised GSE following effective training and the correct use of effective procedures and processes should include the movement of equipment around the aircraft, as well as the selection of appropriate equipment for the GH service or task.
- (b) The procedures and training for the operation of GSE should cover the following, as a minimum:
 - (1) the specific risks on the aerodrome apron and the differences between the risks of driving on the aerodrome movement area compared with driving in 'normal traffic';
 - (2) specialised GSE and heavy GSE and their specific behaviour and risks in the proximity of aircraft;
 - (3) application of procedures regarding driving speed, GSE guidance, brake tests and the no-touch policy;
 - (4) adequate coordination of GH services using GSE during aircraft turnaround to prevent the GSE's collision with the aircraft or with other GSE, considering the aerodrome's operational context;
 - (5) positioning and/or securing of GSE to prevent it from being moved inadvertently during adverse weather conditions;
 - (6) proper visibility of GSE and adequate lighting and marking of the GSE in any conditions, in compliance with the procedures of the aerodrome operator;
 - (7) compliance with the aerodrome operator's instructions and procedures regarding driving and air traffic control clearances.

GM1 GH.OPS.305 General requirements for the operation of ground support equipment

ED Decision 2025/007/R

SAFETY RISK MITIGATION MEASURES FOR OPERATING GSE IN ADVERSE WEATHER CONDITIONS

The aerodrome's procedures for operation in adverse weather conditions will be applied. However, this should not discourage the GH organisation from including additional safety risk mitigation measures, when necessary and as applicable to the operational context. Such mitigation measures include, for example:

- (a) ensuring that the lights on the GSE are visible and functional;
- (b) performing adequate GSE maintenance during winter or significantly hot or humid weather;
- (c) implementing increased securing and enhanced positioning measures for GSE;
- (d) conducting refresher training for GH personnel.

AMC1 GH.OPS.305(b) General requirements for the operation of ground support equipment

ED Decision 2025/007/R

AERODROME MOVEMENT AREA CHART

The GH organisation should ensure an up-to-date copy of the movement area chart of a sufficient size, including hotspots, is readily available in the driver's cabin of each vehicle used for GH operations on the movement area.

GM1 GH.OPS.305(d) General requirements for the operation of ground support equipment

ED Decision 2025/007/R

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 causing any damage to the fuselage.

GH.OPS.310 Aircraft refuelling and defuelling

Regulation (EU) 2025/20

- (a) The aircraft refuelling and defuelling services may be provided by the same organisation responsible for the provision of other ground handling services or by an into-plane fuelling service provider.
- (b) In addition to ensuring compliance with point [GH.OPS.005](#), the into-plane fuelling service provider shall be responsible for the following:
 - (1) ensure safe provision of aircraft refuelling and defuelling and other necessary services in accordance with the operational procedures of the aircraft operator;
 - (2) have and implement communication procedures with the ground handling organisation(s) providing other services during aircraft turnaround, in particular with the turnaround coordination function, and with the aircrew in case of fire or fuel leakage;
 - (3) observe the requirements regarding fire prevention and extinction on the apron and at the parking stands;
 - (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.
- (c) The into-plane fuelling service provider shall have the following responsibilities:
 - (1) apply its emergency procedure in the event of an emergency during refuelling or defuelling as described in its ground handling manual, in particular:
 - (i) stop refuelling;
 - (ii) disconnect the refuelling hose from the aircraft;
 - (iii) move the fuel vehicle or, depending on the refuelling system, press the emergency stop button from the fuel hydrant;
 - (2) use only the fuel type approved for the aircraft type in accordance with the aircraft operator's instructions to prevent any misfuelling and contamination of the fuel;

- (3) ensure that their personnel wears distinctive clothing to enable their easy identification in case of an emergency during refuelling or defuelling operations;
 - (4) observe the refuelling zones as established by the aircraft operator according to the aircraft type, and, in coordination with the ground handling organisation exercising the aircraft turnaround coordination function, prevent any passengers or unauthorised persons from entering those zones or otherwise stop refuelling until the zone is clear;
 - (5) comply with the relevant procedure of the aircraft operator for refuelling or defuelling with passengers on board, passenger boarding or disembarking, including:
 - (i) stopping the refueling operation when the designated emergency exits and escape routes are obstructed;
 - (ii) communication with the person that monitors the refuelling or defuelling operation, as appointed by the aircraft operator, in case of fire or fuel leakage;
 - (6) comply with point ADR.OPS.D.060 of [Regulation \(EU\) No 139/2014](#) as reflected in the aerodrome operator's procedures regarding apron safety during aircraft refuelling.
- (d) Refuelling or defuelling in hangars or similar enclosed buildings shall only be performed with the approval of the aircraft operator and the aerodrome operator and in accordance with the special procedures developed by them.

AMC1 GH.OPS.310 Aircraft refuelling and defuelling

ED Decision 2025/007/R

INTERFACES WITH THE AIRCRAFT OPERATOR AND THE AERODROME OPERATOR

- (a) When several GH organisations perform different aircraft handling services, including fuelling and defuelling performed by an into-plane fuelling agent, the GH organisations should have and apply common procedures to ensure that the following risks are properly mitigated:
 - (1) ignition of fire;
 - (2) injuries to persons or damage to the aircraft, vehicles or buildings;
 - (3) fuel spillage;
 - (4) damage to the environment by contamination or fire;
 - (5) loading of the wrong fuel quantity;
 - (6) refuelling of the aircraft with the wrong fuel type and/or grade or with contaminated or deteriorated fuel;
 - (7) access of passengers or unauthorised persons into the refuelling area;
 - (8) aircraft refuelling in the vicinity of electromagnetic fields.
- (b) The procedures should also address the interaction and communication between the provider of the into-plane fuelling, the GH organisation ensuring aircraft turnaround and the aircrew. The purpose is to ensure safety of operations during turnaround and the smooth coordination of actions and evacuation in the event of an emergency, while maintaining compliance with the aerodrome operator's and aircraft operator's procedures for aircraft refuelling.
- (c) The person performing the refuelling/defuelling with passengers on board, boarding or disembarking should notify the qualified person on board the aircraft (as established by the aircraft operator in its procedure) and those performing the turnaround coordination function

of the GH organisations responsible for the other aircraft ground servicing activities when refuelling is about to begin and when it has been completed.

- (d) The GH organisation should ensure that fire extinguishers are readily available at least for initial intervention in the event of a fuel fire, and that the personnel are trained in their use.

AMC2 GH.OPS.310 Aircraft refuelling and defuelling

ED Decision 2025/007/R

INTERFACES WITH THE AIRCRAFT OPERATOR AND THE AERODROME OPERATOR

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

- (a) In accordance with [Regulation \(EU\) No 965/2012](#), the aircraft operator is responsible for providing the GH organisation with fuelling instructions and procedures, including:
 - (1) safety precautions to be taken during refuelling and defuelling, including when an aircraft's auxiliary power unit is in operation or, for helicopters, when rotors are turning or, for aeroplanes, when an engine is running;
 - (2) procedures for refuelling and defuelling while passengers are embarking, on board or disembarking; and
 - (3) precautions to be taken to avoid:
 - (i) refuelling with the wrong type, or the wrong quantity, of fuel, or
 - (ii) persons not following the established procedures for refuelling.
- (b) In accordance with [Regulation \(EU\) No 139/2014](#), the aerodrome operator is also responsible for establishing a procedure related to the safety of operations on the apron during refuelling/defuelling and ensuring that the other organisations involved follow that procedure.

GM1 GH.OPS.310 Aircraft refuelling and defuelling

ED Decision 2025/007/R

RECOMMENDED GUIDANCE FOR REFUELLING AND DEFUELLING

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

- (a) ICAO Doc 9977, *Manual on Civil Aviation Jet Fuel Supply*;
- (b) the standards and instructions put forward under the JIG in relation to the aviation fuel supply standards:
 - (1) JIG 1 — *Aviation Fuel Quality Control and Operating Standards for Into-Plane Fuelling Services*,
 - (2) JIG 2 — *Aviation Fuel Quality Control and Operating Standards for Airport Depots and Hydrants*,
 - (3) JIG 4 — *Aviation Fuel Quality Control and Operating Standards for Smaller Airports*,
 - (4) EI/JIG 1530 — *Quality Assurance Requirements for the Manufacture, Storage & Distribution of Aviation Fuels to Airports*, and EI 1533 — *Quality assurance requirements for semi-synthetic jet fuel and synthetic blending components (SBC)*;
- (c) the refuelling organisation's own procedures;

- (d) the procedures of the aircraft operator.

AMC1 GH.OPS.310(b) Aircraft refuelling and defuelling

ED Decision 2025/007/R

RESPONSIBILITIES OF PERSONNEL

- (a) The into-plane fuelling personnel are responsible for ensuring that:
- (1) on-specification fuel of the correct grade is always delivered to the aircraft; and
 - (2) the operations are carried out in a safe manner.
- (b) The manager of an into-plane fuelling operation has the overall responsibility for the fuelling operations under their control and is responsible for ensuring that all operations are carried out in accordance with the agreed procedures and following all generally accepted standards of safety and good practices.
- (c) The manager is entitled to visit and make any appropriate tests at the aerodrome depot as may be necessary to ensure that the fuel supplies received and stored at the aerodrome to be used for delivery to aircraft are of the requested quality.

SUPERVISION OF FUELLING OPERATIONS WITH PASSENGERS ON BOARD, BOARDING OR DISEMBARKING

- (d) The person monitoring the refuelling operations with passengers on board, boarding or disembarking is assigned by the aircraft operator, as per its operational procedures. This task may be performed by a person from the GH organisation responsible for aircraft turnaround or from the aircraft operator itself. All the other organisations performing GH activities during turnaround should be informed about who performs this task.
- (e) The person assigned with the task of monitoring the refuelling operations with passengers on board, boarding or disembarking should be trained, as a minimum, in the following areas:
- (1) supervision of refuelling/defuelling operations, with knowledge specific to the aircraft type,
 - (2) communication methods used,
 - (3) aspects of the SMS commensurate with their tasks and responsibilities,
 - (4) dangerous goods,
 - (5) apron safety,
 - (6) the aircraft operator's procedures for refuelling and/or defuelling,
 - (7) the aerodrome operator's local procedure for apron safety during fuelling operations.

GH.OPS.320 Potable water servicing

Regulation (EU) 2025/20

The procedures for potable water servicing shall comply with the requirements laid down in point [GH.OPS.005](#) and also with the following additional requirements:

- (a) liaising with the aerodrome operator to ensure the following:
- (1) all water, for drinking and other personal use, uplifted into the aircraft is free from chemical substances and microorganisms;

- (2) potable water quality test is conducted periodically in accordance with the local health authorities and as per the aircraft operator's procedure;
- (b) observing the requirements laid down in the applicable Union legal acts regarding personal protection equipment for the personnel performing potable water servicing;
- (c) properly mitigating the risk of producing FOD during this activity.

AMC1 GH.OPS.320 Potable water servicing

ED Decision 2025/007/R

POTABLE WATER TESTING, CHEMICAL SUBSTANCES AND GSE

- (a) The GH organisation should ensure that regular tests are performed on the potable water at various water transfer points before it is uplifted into the aircraft potable water reservoir. Evidence of such tests should be kept in accordance with the documents and records requirements.
- (b) The chemical composition of the water to be uplifted into the aircraft potable water reservoir should meet the standards set by the World Health Organization or the relevant state authority, whichever is more stringent.
- (c) The potable water should be free from any unnecessary chemical substances and microorganisms. It may be treated with suitable disinfectants such as those based on chlorine or hydrogen peroxide. Ozone may also be present after further treatment, to provide additional disinfection and protection against microbiological contaminants.
- (d) The potable water servicing equipment should be maintained in accordance with the GSE maintenance programme. The truck should be clearly identified as 'drinking/potable water for aircraft' and regularly cleaned and disinfected in accordance with the applicable standards. When not in use, the potable water truck should be parked in an area different from the one where other GSE with non-potable water is parked.
- (e) The GH organisation should apply any other additional instructions of the aircraft operator.

GH.OPS.325 Aircraft toilet servicing

Regulation (EU) 2025/20

The procedures for aircraft toilet servicing shall comply with the requirements in point [GH.OPS.005](#) and also with the following additional requirements:

- (a) describing the applicable measures in case of leakage;
- (b) promptly identifying any leakage and handling it according to the instructions;
- (c) observing the requirements laid down in the applicable Union legal acts regarding personal protection equipment for the personnel performing aircraft toilet servicing;
- (d) properly mitigating the risk of producing FOD during aircraft toilet servicing.

GH.OPS.330 Aircraft exterior cleaning

Regulation (EU) 2025/20

The procedures for aircraft exterior cleaning shall comply with the requirements of point [GH.OPS.005](#) and also with the following additional requirements:

- (a) performing the aircraft exterior cleaning with products approved by the aircraft manufacturer to avoid damage to the aircraft;
- (b) properly closing the aircraft exterior panels and doors after completing the cleaning;
- (c) observing the requirements laid down in the applicable Union legal acts regarding personal protection equipment for the personnel performing aircraft exterior cleaning;
- (d) using a dedicated area for aircraft exterior cleaning, as established by the aerodrome operator, if applicable;
- (e) properly mitigating the risk of producing FOD during aircraft exterior cleaning.

GH.OPS.335 Aircraft de-icing and anti-icing

Regulation (EU) 2025/20

- (a) The ground handling organisation shall ensure that the necessary checks to ensure availability of service before the cold season are planned and performed in due time for the de-icing and anti-icing operations to be executed safely.
- (b) In addition to compliance with the requirements laid down in point [GH.OPS.005](#), the ground handling organisation shall be responsible for ensuring that the fluids used for de-icing and anti-icing comply with the fluid quality standards, that periodic testing is performed, and that proper storage is provided.
- (c) The ground handling organisation shall cooperate with the aerodrome operator and any relevant authority and organisation to enable the recovery and recycling of the de-icing and anti-icing fluid for environmental protection purposes.
- (d) Where the ground handling organisation uses remote platforms and stands to provide de-icing and anti-icing services, it shall appoint a de-icing coordinator and implement a procedure that includes:
 - (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 and anti-icing stand;
 - (3) indication to the flight crew of the removal of equipment and end of de-icing and anti-icing operation for a safe return of the aircraft to the movement area.

AMC1 GH.OPS.335 Aircraft de-icing and anti-icing

ED Decision 2025/007/R

APPLICABLE INDUSTRY STANDARDS

The GH organisation should apply the following industry (SAE) standards for de-icing and anti-icing, in their latest published version:

- (a) AS6285 — ‘Aircraft Ground Deicing/Anti-Icing Processes’;
- (b) AS6286 — ‘Aircraft Ground Deicing/Anti-icing Training and Qualification Program’;
- (c) AS6332 — ‘Aircraft Ground Deicing/Anti-icing Quality Management’;
- (d) AMS1424 — ‘Deicing/Anti-Icing Fluid, Aircraft, Newtonian - SAE Type I for the deicing/anti-icing fluid quality control procedures’;

- (e) AMS1428 — ‘Fluid, Aircraft Deicing/Anti-Icing, Non-Newtonian, Pseudo-Plastic, SAE Types II, III and IV, as applicable, for the deicing/anti-icing fluid quality control procedures’;
- (f) ARP6257 — ‘Aircraft Ground De/Anti-Icing Communication Phraseology for Flight and Ground Crews’.

AMC2 GH.OPS.335 Aircraft de-icing and anti-icing

ED Decision 2025/007/R

RESPONSIBILITIES OF THE GH ORGANISATION PROVIDING DE-ICING/ANTI-ICING SERVICES

- (a) The GH organisation providing de-icing/anti-icing services should develop, implement and maintain a de-icing/anti-icing programme compliant with the industry standards referred to in [AMC1 GH.OPS.335](#).
- (b) The GH organisation is responsible for the following:
 - (1) ensure that quality control processes and procedures for de-icing/anti-icing are applied and maintained for continued operational safety;
 - (2) adhere to the aircraft operator’s procedures regarding the de-icing/anti-icing treatment of the aeroplane;
 - (3) adhere to the aerodrome operator’s standards and procedures related to safety and operability of the designated de-icing/anti-icing facilities or areas;
 - (4) ensure that all personnel are effectively trained and qualified to coordinate, supervise and execute the de-icing/anti-icing treatments, and are familiar with, and apply the operational procedures as per the GH organisation’s manual, the aircraft operator procedures specific to the aircraft type, and local aerodrome procedures;
 - (5) ensure that sufficient competent personnel, adequate facilities equipment and de-icing/anti-icing fluids are available;
 - (6) use de-icing/anti-icing fluids that are acceptable to the aircraft operator and are within the limits specified by the fluid manufacturer;
 - (7) establish a communications process that ensures clear, concise and on-time communication for all de-icing/anti-icing operations, including with other organisations involved in the de-icing process (e.g. air traffic control, other GH organisations personnel, aircraft operator). For de-icing/anti-icing at remote pads, communication between the de-icing operator responsible for the operation and the flight crew should be established before beginning the de-icing/anti-icing process and continually maintained during the entire process, until the de-icing/anti-icing is completed and the aircraft departs from the de-icing area;
 - (8) maintain an environmentally responsible de-icing operations programme;
 - (9) liaise with the aerodrome operator on the procedures applicable to it as aerodrome user by attending meetings and communicating regularly.

AMC3 GH.OPS.335 Aircraft de-icing and anti-icing

ED Decision 2025/007/R

DE-ICING AND ANTI-ICING PROCEDURES AND INSTRUCTIONS

- (a) The de-icing/anti-icing procedures should ensure compliance with the relevant regulations and global aircraft de-icing standards as referred to in [AMC1 GH.OPS.335](#).

- (b) The procedures 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) procedures and instructions for de-icing/anti-icing at remote stands/facilities, when applicable;
 - (3) use of suitable de-icing/anti-icing equipment meeting the specification of ARP1971;
 - (4) verification, sampling, storage, requalification and operational quality assurance of de-icing/anti-icing fluids;
 - (5) post-de-icing/anti-icing check, when applicable;
 - (6) protocol for communications with the flight crew before, during and upon completion of the deicing/anti-icing operations;
 - (7) communicating the anti-icing code and/or post-de-icing report to the flight crew, when applicable;
 - (8) documentation of all de-icing/anti-icing treatments;
 - (9) use of correct tools and clothing for de-icing/anti-icing personnel;
 - (10) arrangements for environmental protection.

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

ED Decision 2025/007/R

ADDITIONAL DOCUMENTATION

- (a) ICAO Doc 9640 'Manual of Aircraft Ground De-icing/Anti-icing Operations' should be consulted and relevant information applied.
- (b) The following FAA documentation, published annually, should be consulted and relevant information applied:
- (1) FAA Holdover Time Guidelines [for the corresponding Winter],
 - (2) FAA Ground Deicing Program – General Information.

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

ED Decision 2025/007/R

PREPARATION FOR THE WINTER SEASON

- (a) The GH organisation should coordinate with the aerodrome operator and, whenever possible, the aircraft operator in preparation for de-icing/anti-icing operations sufficient time in advance of the winter season. The plan for the winter season should be communicated to all stakeholders concerned.
- (b) The GH organisation should ensure that its personnel have received adequate training to ensure their continued competence for the winter season, including to execute de-icing/anti-icing operations.

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

ED Decision 2025/007/R

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

- (a) It is recommended that coordination for the winter season include the following elements for all stakeholders involved, as a minimum and to a relevant extent:
 - (1) exchanging the documents/procedures/manuals covering winter season operations;
 - (2) the aerodrome operator and the GH organisation communicating local procedures at the aerodrome of operation, including instructions and procedures for cold weather operations, to the aircraft operators.
- (b) Pooling of resources for de-icing/anti-icing operations should be enabled whenever feasible and efficient.
- (c) It is recommended that the following components be ensured or checked, as a minimum:
 - (1) remote de-icing pads verified for serviceability and preventive maintenance of GSE to ensure their proper operation;
 - (2) initial or recurrent training for GH personnel, as applicable;
 - (3) availability of de-icing/anti-icing fluids;
 - (4) fluid quality checks;
 - (5) fluid storage facilities' serviceability (functionality of pumps, valves, equipment filling point nozzles, etc.);
 - (6) availability of operational procedures, including any updates and specific or local operational procedures of aircraft operators and aerodrome operator.
- (d) It is recommended to test, when possible, the plan for winter operations with the aerodrome operator, with the optional participation of aircraft operators.

SUBPART 4 — AIRCRAFT TURNAROUND

GH.OPS.400 Coordination of aircraft turnaround activities

Regulation (EU) 2025/20

- (a) The ground handling organisation shall ensure the safe provision of ground handling services and aircraft handling during turnaround by establishing a function for the coordination of turnaround activities. The coordination of the turnaround activities shall take into account the turnaround plan specified by the aircraft operator.
- (b) Where more than one ground handling organisation is involved in the provision of ground handling services to the same aircraft operator according to the aircraft operator's turnaround plan, the ground handling organisations concerned shall agree [among themselves] which one is responsible for the turnaround coordination function unless this is established by the aircraft operator.
- (c) The ground handling organisation responsible for the aircraft turnaround coordination shall have a written procedure for the coordination of the turnaround activities that includes the following aspects:
 - (1) ground handling activities to be monitored and coordinated during aircraft turnaround;
 - (2) whether the turnaround coordination function is performed by a person or an automated device, on the aerodrome or remotely; if applicable, the person responsible for this function;
 - (3) coordination of communication with all the organisations involved, be it other ground handling organisations, the aircraft operator or the aerodrome operator;
 - (4) tasks associated with the turnaround coordination function;
 - (5) ensure that the load of tasks per person does not jeopardise the safety of activities;
 - (6) when refuelling and defuelling operations take place with passengers being on board, boarding or disembarking, ensure the following:
 - (i) all the following points shall be kept clear of obstacles:
 - (A) designated emergency exits;
 - (B) escape routes, including that of the fuel vehicle;
 - (C) 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;
 - (D) Fuel Emergency Stop button, where fitted;
 - (ii) the into-plane fuelling service provider shall be informed immediately when the designated evacuation exits and escape routes are obstructed;
 - (7) dissemination of the written procedure to all the persons involved.
- (d) The turnaround plan applied to each aircraft shall observe the aircraft type specificities and aircraft limitations. The turnaround coordination shall take into account the operational context of the aerodrome.

- (e) The ground handling organisation shall observe the requirement to alert the aerodrome emergency services in accordance with point ADR.OPS.D.050 of [Regulation \(EU\) No 139/2014](#) for accidents and incidents on the apron.

AMC1 GH.OPS.400 Coordination of aircraft turnaround activities

ED Decision 2025/007/R

GENERAL

- (a) Turnaround coordination should cover the GH services provided to an aircraft between the moment when the aircraft leaves the centre line of the taxiway to park at a stand until it departs from the stand.
- (b) The instructions and procedures for turnaround coordination should address at least the following key safety risks:
- (1) injuries to passengers around the aircraft due to lack of coordination during passenger boarding/disembarkation,
 - (2) injury/death of personnel on the apron,
 - (3) accidents/incidents during take-off due to incorrect aircraft loading,
 - (4) damage to GSE/aircraft due to improper coordination between GH organisations providing different GH services during turnaround,
 - (5) collision between vehicles or between vehicles and aircraft,
 - (6) jet blast incidents.

AMC2 GH.OPS.400 Coordination of aircraft turnaround activities

ED Decision 2025/007/R

TURNAROUND COORDINATION FUNCTION AND ACTIVITIES

- (a) The aircraft turnaround activities should be coordinated by one person or by means of a computerised system.
- (b) The turnaround coordination function is responsible for monitoring and coordinating the following GH activities:
- (1) aircraft arrival;
 - (2) operation of GSE to or around the aircraft, including PBBs, passenger stairs and loading equipment for baggage and cargo operations;
 - (3) aircraft loading/unloading;
 - (4) passenger disembarkation and boarding, including PRMs;
 - (5) ground transport of passengers, crews, baggage and cargo;
 - (6) aircraft refuelling; the aircraft operator may assign the additional task of monitoring the refuelling operations with passengers on board, boarding or disembarking;
 - (7) potable water and aircraft toilet servicing;
 - (8) catering unloading/loading;
 - (9) aircraft departure activities;

- (10) aircraft pushback/towing;
 - (11) aircraft de-icing/anti-icing when not carried out at a remote stand;
 - (12) any other additional tasks requested by the aircraft operator;
 - (13) coordination and communication with those performing the GH services indicated above and with load control personnel;
 - (14) coordination and communication with the aircraft operator's flight crew, the aerodrome operator and any other organisations involved in the GH activities to the aircraft on the apron and preparation for flight, as required.
- (c) The procedure for the turnaround coordination function should ensure the presence of safe and effective equipment staging areas on the apron. Effective configuration of stands should be coordinated with the aerodrome operator.
- (d) The turnaround coordination function should establish and implement a ground communications system and clear lines of communication with the organisations or persons responsible for the provision of various GH services to the same aircraft during turnaround.

GH.OPS.405 Aircraft arrival

Regulation (EU) 2025/20

- (a) The operational procedures relating to the arrival of an aircraft shall be appropriate to the aircraft type and shall cover:
- (1) securing of the aircraft on the ground;
 - (2) marking the aircraft danger zones;
 - (3) operation of cargo compartment doors and service panels;
 - (4) positioning of the GSE, including the ground power unit and pre-conditioned air unit if applicable;
 - (5) operation of passenger boarding bridges or other GSE such as passenger stairs.
- (b) The parking stand shall be inspected prior to aircraft arrival and the applicable aerodrome operator procedures shall be applied.

AMC1 GH.OPS.405 Aircraft arrival

ED Decision 2025/007/R

INSPECTION OF THE PARKING STAND

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

- (a) the personnel apply the aerodrome operator's FOD programme;
- (b) the parking stand is free of GSE and personnel other than those required to assist during the aircraft's arrival at the aircraft stand, with the airbridge fully retracted.

GH.OPS.410 Aircraft securing on the ground

Regulation (EU) 2025/20

- (a) The ground handling organisation shall have and implement operational procedures to ensure that the aircraft is secured against any unintended movement, in accordance with the

- procedures and instructions of the aircraft operator or, as agreed with the aircraft operator, in accordance with the operational procedures of the ground handling organisation.
- (b) The procedures referred to in point (a) shall include safety measures to ensure that only ground handling personnel with specific tasks to be carried out in this phase are allowed to approach the aircraft before the anti-collision lights are turned off and the engines are shut.
 - (c) The equipment restraint area shall be marked by placing safety cones around the aircraft areas that are susceptible to ground damage.

GH.OPS.415 Aircraft loading and unloading

Regulation (EU) 2025/20

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

- (a) aircraft loading is performed in accordance with the written loading instructions, and any loading specifications and requirements related to dangerous goods and other special cargo, mail, baggage items or equipment in compartment are observed;
- (b) the aircraft stability is maintained during unloading and loading;
- (c) the unloading team has the appropriate inbound flight documentation;
- (d) the aircraft cargo compartment is empty prior to loading except in the case of transit flights or where the aircraft operator instructions state otherwise, and there are no damages or leaks; if any damage is identified, the aircraft operator shall be informed;
- (e) the loading is performed so as not to damage the cargo compartment or the cargo compartment doors;
- (f) the ULDs and other loose equipment are in serviceable condition, do not contain water or snow, and there is no damaged or leaking cargo;
- (g) the items and ULDs loaded in the cargo compartments are properly restrained to prevent any movement or shifting during flight;
- (h) the ULD type loaded on the aircraft corresponds to what is specified in the loading instructions;
- (i) the cargo compartment doors are properly closed;
- (j) any last-minute changes related to baggage or cargo loading are recorded on the mass and balance documentation and distributed for the information of the persons identified in the aircraft operator's procedure;
- (k) the mass and balance document containing the loading instructions is signed by the person responsible for loading supervision to confirm that the aircraft loading and load distribution have been completed as per the instructions;
- (l) communication related to aircraft loading and load distribution is ensured between the person responsible for loading supervision and the person responsible for load planning and issuance of the related mass and balance documentation, as well as any other intermediary person if load planning is a remote function that is not performed at the departure station;
- (m) a copy of the mass and balance documentation containing the loading instructions is retained on the ground and accessible to the ground personnel responsible for flight operations until after the arrival of the flight;
- (n) loading and unloading are executed with GSE adequate to the aircraft type and task, as the case may be;

- (o) any damage or malfunctions identified to the in-plane loading system are notified to the aircraft operator.

AMC1 GH.OPS.415 Aircraft loading and unloading

ED Decision 2025/007/R

AIRCRAFT LOADING AND UNLOADING

- (a) The procedures for aircraft loading and unloading should cover the following key risks, as a minimum:
 - (1) injuries to persons;
 - (2) damage to the aircraft;
 - (3) failure to communicate any last-minute changes to the persons responsible for aircraft load planning and the aircrew, in accordance with the aircraft operator's procedures;
 - (4) improper restraining and securing of load in the cargo compartment, leading to changes in the aircraft's centre of gravity or the actual weight of the aircraft due to load shifting during flight;
 - (5) use of inadequate ULDs or restraint systems;
 - (6) failure to comply with the loading instructions, with a negative effect on aircraft load limitations and spread limitations;
 - (7) unfamiliarity with the cargo compartment configuration;
 - (8) use of inadequate GSE for loading/unloading;
 - (9) for cargo aircraft only (CAO), additional risk areas may be:
 - (i) higher amount of dangerous goods in CAO;
 - (ii) larger and heavier or outsized freight and ULDs (e.g. engines, cars, industrial equipment and machinery, large and heavy live animals);
 - (iii) aircraft's main deck as a complex loading hold with different positions and restrictions.
- (b) When different team leaders are used for inbound and outbound flights, they should ensure a formal and complete handover of tasks and briefing on special procedures or loading/unloading specificities. The unloading team should have a copy of the inbound container pallet message identifying the position of the ULDs or pallets in the cargo compartments.
- (c) The loading/unloading teams should be aware of and apply any instructions of the aircraft operator requiring that its fly-away kit be always carried on board the aircraft.
- (d) The procedures and documentation related to restraint equipment should be specific to the aircraft type and in accordance with the aircraft operator's instructions regarding aircraft mass and balance documentation.
- (e) The loading and unloading procedure should include a step covering gross error checks in securing load and restraint devices.

AMC2 GH.OPS.415 Aircraft loading and unloading

ED Decision 2025/007/R

SAFETY RISK MITIGATION MEASURES FOR LOADING AND UNLOADING DANGEROUS GOODS

- (a) The procedures for aircraft loading/unloading should cover the following safety objectives:
 - (1) prevention of damage to packages and ULDs (pallets and containers);
 - (2) consolidation of dangerous goods to ensure segregation of incompatible dangerous goods and comply with ICAO's 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 from being loaded on passenger aircraft.
- (b) In case of damaged or leaking packages:
 - (1) packages found damaged or leaking before loading should not be loaded into an aircraft;
 - (2) packages found damaged or leaking in the cargo compartment should be unloaded from the aircraft;
 - (3) if leakage is found in the cargo compartment, check for other contaminated packages and assess if they can be transported;
 - (4) inform the commander/pilot-in-command by applying the NOTOC procedure;
 - (5) apply any additional procedures, including for reporting, of the aircraft operator and aerodrome operator.

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

ED Decision 2025/007/R

AIRCRAFT CARGO COMPARTMENTS

As stated in point [GH.OPS.415](#)(d), the aircraft cargo compartments must be empty prior to loading, with several exceptions:

- (a) a fly-away kit containing items and tools necessary for aircraft repairs, which is required by the aircraft operator to be carried on all flights (may be carried in a customised ULD or in a different way);
- (b) other equipment (equipment in compartment (EIC)), company mail (COMAIL) or company material (COMAT);
- (c) ballast;
- (d) in the case of transit flights, for which the baggage, cargo and mail loaded for the next or final destination remain on board the aircraft.

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

ED Decision 2025/007/R

LOADING INSTRUCTIONS/REPORT (LIR)

- (a) The loading instructions document (also called 'loading instructions/report' or 'LIR') is generated for the purpose of providing support to the person supervising the aircraft loading in

order to facilitate this activity and ensure that the load distribution and aircraft loading are completed as per the instructions.

- (b) The loading instructions contain information about the maximum mass of items that may be loaded in each cargo compartment and instructions for the safe and optimal distribution of items to be loaded in the cargo compartments, along with the cargo segregation rules.
- (c) The LIR may be part of an existing mass and balance document or a separate form.
- (d) Usually, the signature on the LIR of the person responsible for loading supervision is the confirmation that the aircraft has been loaded in accordance with the loading instructions. The function of this signed document is to serve as a report. A signed copy of the LIR is retained on the ground.

GH.OPS.420 Loading supervision

Regulation (EU) 2025/20

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

- (a) briefing of the unloading team in accordance with the loading messages received prior to aircraft unloading and briefing of the loading team in accordance with the loading instructions prior to aircraft loading;
- (b) monitoring of the aircraft unloading and loading, ensuring that the bulk load is intact and there is no damage or leakage prior to loading;
- (c) loading and securing of baggage and cargo items in the position indicated on the package, so as to prevent their movement in any direction and to maintain their segregation and separation in accordance with the dangerous goods requirements;
- (d) verifying that all the steps referred to in point [GH.OPS.415](#) are complied with;
- (e) check of the load against the related documentation such as cargo manifest, baggage manifest, or the special load NOTOC, if available;
- (f) confirmation that loading is carried out as specified in the final loading instruction form;
- (g) report of any deviations from the planned loading and any special, overweight or non-standard items presented for loading not already included in the loading instructions.

AMC1 GH.OPS.420 Loading supervision

ED Decision 2025/007/R

LOADING SUPERVISION

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

GM1 GH.OPS.420 Loading supervision

ED Decision 2025/007/R

BRIEFING OF THE LOADING/UNLOADING TEAMS

It is recommended that briefings cover the following elements, as applicable:

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

GH.OPS.425 Unit load devices

Regulation (EU) 2025/20

The ground handling organisation shall ensure the following with regard to the ULDs for both baggage and cargo load:

- (a) the aircraft operator instructions are followed with regard to the correct use of the ULD type and the ULDs are within the acceptable limits established according to the manufacturer instructions and empty before use;
- (b) the ULDs are checked to ensure that 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) for ULDs in the form of an aircraft container, 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 and separation of dangerous goods, as well as their storage and securing in the position indicated on the package, and prevention against movement in any direction within that ULD;
 - (5) integrity of the load and the ULD;
- (f) each ULD in the form of an aircraft container is identified by unique identification codes or markings;
- (g) the ULDs are stored in conditions that prevent their damage; storage on the ground shall not be permitted;
- (h) ULD storage limitations set by the aerodrome operator shall be complied with and when the planned number of ULDs stored at the airport is exceeded, the ground handling organisation shall have procedures and arrangements with the aircraft operators to transport the ULDs to other available locations as soon as possible;

- (i) 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;
- (j) the ULDs are properly secured to avoid uncontrolled movements in adverse weather conditions;
- (k) the ULDs are checked and damages are reported to the aircraft operator according to the aircraft operator instructions;
- (l) personnel involved in ULD handling are properly trained;
- (m) in case of ULD pooling, the organisations concerned shall establish and document clear responsibilities of each party involved in the pooling.

GH.OPS.430 Aircraft departure activities

Regulation (EU) 2025/20

- (a) The ground handling organisation shall coordinate the aircraft departure with the other organisations involved in this activity.
- (b) The operational procedure for engine starting shall ensure:
 - (1) that only the personnel and GSE required to assist the engine starting and pushback or towing operations remain within the equipment restraint area;
 - (2) that any condition that may endanger the safety of the engine starting is immediately communicated to the flight crew and the engine starting is delayed;
 - (3) that instructions for the use of the air start unit are included in the ground handling manual;
 - (4) the safety of personnel in the case of using an air start unit or a ground power unit;
 - (5) safe disconnection of equipment from the aircraft before departure;
 - (6) that the aircraft danger zone is clear of equipment and persons;
 - (7) that the final step of the engine start operation is clearly indicated so that the pushback or towing operation can begin.

AMC1 GH.OPS.430 Aircraft departure activities

ED Decision 2025/007/R

SAFETY RISK MITIGATION MEASURES FOR PRE-DEPARTURE AND DEPARTURE ACTIVITIES

- (a) The procedure for pre-departure activities should include, as a minimum, the following safety risk mitigation measures:
 - (1) pre-departure check of the aircraft and the stand to verify that:
 - (i) the stand is clear of FOD;
 - (ii) any GSE unnecessary for aircraft start and departure is removed, and no persons are 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) The procedure for departure activities should cover the following:
- (1) communication, including phraseology/standard hand signals, between the flight crew and the person responsible for the departure operation;
 - (2) agreement and following of engine start sequence, and application of operational procedures for the use of air start unit, if required;
 - (3) disconnection of the GSE (air start unit, ground power unit, etc.) and removal from the equipment restricted area;
 - (4) pushback or towing procedures include correct pushback or towing equipment for aircraft type/subtype and other conditions specific to the operational context.

GH.OPS.435 Aircraft towing and pushback

Regulation (EU) 2025/20

- (a) The responsibility for the aircraft towing/pushback operations may be split between several organisations. The ground handling organisation shall be responsible for the following:
- (1) correct implementation of the operational procedures of the aircraft operator or of the ground handling organisation, if so agreed with the aircraft operator, which:
 - (i) are specific to the aircraft type and towing/pushback vehicle type; and
 - (ii) comply with the equipment manufacturer instructions for the operation of the towing equipment, where the manufacturer has provided such instructions;
 - (2) correct implementation of the communication procedures with the other persons involved in the towing or pushback operation;
 - (3) connection and disconnection of the aircraft to/from the vehicle/towbar;
 - (4) driving or remotely controlling of the towing/pushback vehicle;
 - (5) when a wing walker is involved, maintaining communication with the wing walker 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) ensuring 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) In addition to the requirements listed in point (a), the ground handling organisation shall apply the aerodrome procedures established by the aerodrome operator in accordance with the provisions of [Regulation \(EU\) No 139/2014](#) in relation to aircraft ground movements, in particular points ADR.OPS.B.028, ADR.OPS.B.080, ADR.OPS.D.001, ADR.OPS.D.015, ADR.OPS.D.040.

AMC1 GH.OPS.435 Aircraft towing and pushback

ED Decision 2025/007/R

SAFETY RISK MITIGATION MEASURES

The aircraft towing or pushback procedures should cover the following:

- (a) means of developing and maintaining situational awareness of traffic during aircraft towing/pushback operations;

- (b) communication between the towing/pushback vehicle driver and, if applicable, the wing walker or the flight crew in the cockpit;
- (c) use of towing/pushback GSE adequate for the aircraft type;
- (d) use of methods to reduce risks caused by:
 - (1) multiple blind spots around the aircraft,
 - (2) wing walker being struck by lightning via the cord,
 - (3) operator tripping or snagging machinery as they carry a 15-m-long copper cable around,
 - (4) inadvertent brake application during towing by GH personnel.

GH.OPS.440 Communication and phraseology

Regulation (EU) 2025/20

- (a) The communication between the flight crew and the ground handling persons responsible for aircraft pushback/towing shall ensure safe operation of the aircraft and the safety of its occupants and of the persons, d vehicles and other aircraft on the ground.
- (b) The ground handling organisation shall ensure that its personnel observe the standard phraseology for aircraft pushback/towing operations as established in point SERA.14001 of [Implementing Regulation \(EU\) No 923/2012](#).

GM1 GH.OPS.440 Communication and phraseology

ED Decision 2025/007/R

DEVIATIONS FROM STANDARD PHRASEOLOGY DURING PUSHBACK AND TOWING OPERATIONS

It is recommended that the GH organisation record, as part of its internal reporting, cases of deviations from standard phraseology during towing and pushback that endanger these operations. The purpose of collecting such data is to use it to identify potential safety hazards and apply the appropriate mitigation measures to ensure safe towing and pushback operations.

SUBPART 5 — CARGO AND MAIL HANDLING

GH.OPS.500 Cargo and mail handling — General requirements

Regulation (EU) 2025/20

- (a) The activities referred to in [Article 2.2](#)(e) points (i) to (iv) of this Regulation may be performed in a cargo terminal or a cargo warehouse at an aerodrome or adjacent to it.
- (b) The ground handling organisation shall apply the operational procedures for cargo and mail handling provided by the aircraft operator unless agreed otherwise with the aircraft operator.
- (c) Notwithstanding point (a), the ground handling organisation shall have and implement operational procedures for the safe transportation of cargo and mail covering the following aspects:
 - (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, not linked to safety aspects, as required by applicable regulations;
 - (ii) if applicable, dangerous goods acceptance checks in accordance with Annex 18 to the Chicago Convention and the ICAO Technical Instructions relating to that Annex;
 - (iii) cross-checks of the cargo against the accompanying documentation on behalf of the aircraft operator;
 - (iv) planning of the build-up;
 - (2) final build-up of the cargo, if this was not performed before its arrival at the cargo terminal, and storage of the cargo before the flight;
 - (3) transportation of the cargo shipment to and from the aircraft;
 - (4) intervention in case of cargo damage, leakage or spillage.
- (d) The cargo operations may be performed together by the qualified personnel of the ground handling organisation and the aircraft operator, as priorly agreed.

GM1 GH.OPS.500 Cargo and mail handling — General requirements

ED Decision 2025/007/R

CARGO HANDLING ACTIVITIES IN A CARGO WAREHOUSE

- (a) A cargo warehouse in the scope of [Commission Delegated Regulation \(EU\) 2025/20](#) is any cargo handling facility located at the aerodrome premises or adjacent to it (i.e. in its immediate vicinity) that is authorised to accept cargo ready for carriage, storage and final build-up, and to perform 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 [GH.OPS.500](#)(c(1) and (c)(2) are not included in the scope of Commission Delegated Regulation (EU) 2025/20.

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

ED Decision 2025/007/R

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's personnel may be involved in the cargo handling process: aircraft offloading/loading supervision, cargo build-up supervision, etc.
- (b) Whether cargo is handled with or without direct involvement of the personnel of the aircraft operator, it is subject to compliance with [Commission Delegated Regulation \(EU\) 2025/20](#) and the applicable requirements of [Regulation \(EU\) No 965/2012](#).

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

Regulation (EU) 2025/20

The ground handling organisation shall handle special cargo in accordance with the operational procedures provided by the aircraft operator or, when agreed with the aircraft operator, in accordance with its own operational procedures referred to in [GH.OPS.500\(c\)](#).

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

ED Decision 2025/007/R

SPECIAL CARGO

The following items are considered special cargo:

- (a) pharmaceutical products,
- (b) live animals,
- (c) perishable items,
- (d) wet cargo,
- (e) human remains,
- (f) oversized and/or heavy items,
- (g) any other items that require special handling and/or transport.