ANNEX III
ORGANISATION REQUIREMENTS FOR GROUND HANDLING SERVICE PROVIDERS (PART ORGH)

SUBPART GEN – GENERAL REQUIREMENTS

ORGH.GEN.005 Scope

(a) This Annex establishes the requirements to be followed by ground handling service providers (GHSP), aircraft operators providing ground handling services to their own aircraft and passengers (self-handling) and by any other organisation that provides ground handling services at an aerodrome within the scope of Regulation (EU) 2018/1139.

(b) Without prejudice to point (a), this Annex shall not apply to self-handling aircraft operators and organisations performing load control activities related to load planning, mass&balance calculations, and production of load control documents, including when these services are provided at an aerodrome. Those activities shall be conducted under the responsibility and control of the aircraft operator and included in their management system. When outsourced to a third-party GHSP, those GHSP shall, in addition, comply with point ORO.GEN.205 of Reg. (EU) 965/2012 as contracted services.

(c) Without prejudice to point (a), this Annex shall not apply to self-handling aircraft operators conducting ground supervision activities at an aerodrome. Such activities shall be included in the aircraft operator's management system and further described in its operations manual in accordance with point ORO.MLR.100 of Regulation (EU) No 965/2012.

Rationale

This IR establishes the scope of this Annex.

The exceptions identified in points (b) and (c) are already included in the Cover Regulation. They are repeated here more for reminding purposes, but it is likely that they will be removed from the final version.

GM1 ORGH.GEN.005 Scope

APPLICATION OF THIS ANNEX

(a) This Annex applies to the following types of organisations:

(1) providers of ground handling (GH) services,

(2) aircraft operators providing GH services to their own passengers and the aircraft in their fleet (self-handling). This is established through the definition of GH handling services of Article 3 of Regulation (EU) 2018/1139,

(3) aerodrome operators providing GH services, which are also considered GH handling service providers (GHSP) for the purpose of this Regulation,

(4) providers of apron management services,

as long as these provide GH services at an aerodrome within the scope of Regulation (EU) 2018/1139.

(b) This Annex applies also to GHSP that provide services to another GHSP under a contract.

(c) This Annex applies also to GHSP that provide ground supervision and air operator representation services at an aerodrome. It does not apply to an aircraft operator that appoints a person or a group of persons from their own organisation (self-handling) for representation purposes and/or to ensure supervision of GH services provided by a third-party GHSP at the aerodromes where it operates.

(d) This Annex does not apply to GHSP that provide services from a remote location which is outside an aerodrome under the scope of Regulation (EU) 2018/1139. Such organisations shall be included under the management system of the aircraft operator and shall comply with the requirements of Regulation (EU) 965/2012 on air operations applicable to contracted activities.

ORGH.GEN.105 Competent authority

The competent authority of the GHSP shall be the authority of the aerodrome where the ground handling service is provided.

Rationale:

This implementing rule transposes Art. 62 pt. 4 of the Basic Regulation (BR).

The content of this rule is also mirrored in ARGH.GEN.100.

GM1 ORGH.GEN.105 Competent authority

GH SERVICES PROVIDED OUTSIDE AN AERODROME – FLIGHT DISPATCH SERVICES

The providers of flight dispatch services operate under the responsibility and the management system of the aircraft operator. Those services are directly linked to the operational control system used by the air operator, and therefore are not subject to the provisions of this regulation.

The following elements are at the basis of the non-inclusion of these activities within the scope of this Regulation, which follows a pragmatic approach:

(a) The flight dispatch activities are closely connected to flight operations as an intrinsic part of the operational control system.

(b) Flight dispatch activities are under the full control and responsibility of the air operator.

(c) The flight dispatch activities are usually performed by the aircraft operator itself or are outsourced to a third-party service provider under the provisions of ORO.GEN.205 Contracted activities. This way, the aircraft operator is responsible to ensure the safety of these activities through its own safety management and safety risk assessment processes.

(d) An aircraft operator usually operates at more than one aerodrome but has a fixed principal place of business.

Rationale

The provisions applicable to flight dispatch activities and providers of these services will be included in Reg. (EU) 965/2012.

GM1 ORGH.GEN.105 Competent authority

GH SERVICES PROVIDED OUTSIDE AN AERODROME – LOAD PLANNING, MASS&BALANCE CALCULATIONS, AND PRODUCTION OF LOAD CONTROL RELATED DOCUMENTS

(a) The providers of load control services related to load planning, mass&balance calculations and production of load control related documents are not subject to this regulation. These activities are included in the management system of the aircraft operator and therefore subject to the management system requirements applicable to an aircraft operator as established by Regulation (EU) 965/2012.

(b) When these activities are outsourced to a third-party service provider, regardless of whether it provides these services at an aerodrome or from a remote location outside an aerodrome, the provisions of ORO.GEN.205 of Reg. (EU) 965/2012 apply.

(c) The load control activities related to the actual loading of the aircraft are subject to direct oversight by the competent authority of the aerodrome within the scope of Reg. (EU) 2018/1139 where these services are provided.

Rationale

The provisions applicable to the load control functions of load planning, mass&balance calculations and related load control document production and providers of these services will be included in Reg. (EU) 965/2012.

ORGH.GEN.110 Responsibilities of the GHSP

(a) The GHSP shall be responsible for the safe provisions of services in accordance with all of the following:

(1) the requirements of this Regulation;

(2) Regulation (EU) 2018/1139 and its delegated and implementing acts;

(3) its declaration;

(4) the content of the aerodrome manual and procedures applicable to the GHSP, including those in relation to movements of its vehicles, equipment and personnel and the risk related to aerodrome operations in winter, at night and in adverse weather conditions;

(5) the content of the operations manual, procedures and instructions of the aircraft operator related to GH services, where they exist;

(6) any other manual or procedure applicable to its organisation, personnel and ground support equipment that it employs for the execution of GH activities.

(b) The GHSP shall establish a ground handling service manual, procedures and any necessary instructions for the safe completion of its activities.

(c) The GHSP shall ensure that all personnel directly involved in ground handling activities comply with the following conditions:

(1) are properly trained and have demonstrated their competence in their particular duties,

(2) are aware of their responsibilities,

(3) are aware of the safety-relevant relationships and interfaces between the functions and activities of the GHSP, the aerodrome operator and the aircraft operator.

Rationale: Paragraph (a) implements parts of BR Annex VII Essential requirements for aerodromes, Section 4.

Point (a)(1) covers this Annex and the other annexes that are directly applicable to a GHSP (Operational standards). Exception is the Annex that provides the authority requirements.

Point (a)(4) implements pt. 4.1 (b) and (c) of BR Annex VII. Paragraph (c) implements point 4.1(e) of BR Annex VII.

Point (a)(6) is drafted to address also the cases when aircraft operators are not required to have an operations manual, such as non-commercial operators of complex motor-powered aircraft (NCC), air operators conducting certain types of operations (see AMC2 ORO.MLR.100) or NCO operators (non-commercial operations with other-than-complex motor-powered aircraft).

Point (b): The GHS manual is a BR requirement, so the GHSP must have one. However, how it is structured and if it is issued in one or several separate documents or procedures – this remains flexible. Those procedures may be in its GHS manual or issued separately. The GHSP must only ensure cross-reference between the separate parts and apply document management system to all those procedures and separate documents.

Point (c) transposes point 4.1(e) of BR Annex VII and refers to competences demonstrated in their particular duties. This implies a training programme based on both knowledge, skills and attitudes. This is further addressed in the Training section. This paragraph is only a generic one, that links the development of personnel to the management system of the GHSP.

AMC1 ORGH.GEN.110(a) Responsibilities of the GHSP

COMPLIANCE WITH APPLICABLE REQUIREMENTS

(a) The GHSP should conduct periodical reviews of the applicable requirements with which it declares compliance, to ensure its documentation, processes and procedures are current and up-to-date.

(b) In conducting such reviews, the organisation should:

(1) ensure that any changes to the applicable requirements, standards and documents or new requirements applicable to its GH activities are identified and assessed for inclusion into their own management system; and

(2) be able to show evidence of such reviews and assessments.

Rationale

While the references provided in the implementing rule should always be understood as dynamic references unless indicated otherwise, meaning that the documents and regulations referred to are always at their latest amendment, this AMC establishes a means to ensure that the GHSP checks regularly whether its management system is up-to-date and currently compliant with the latest regulatory revisions.

GM1 ORGH.GEN.110(b) Responsibilities of the GHSP

GROUND HANDLING SERVICE MANUAL (GHSM)

If the provider of GH services already has an operations manual or an aerodrome manual under its existing management system, then its manual only needs to be amended to incorporate the GH specific elements. The organisation can decide how to organise its manual, whether it intends to have a single manual to include all procedures and mandatory elements of all the organisations included in its management system or issue separate parts for each of them.

ORGH.GEN.115 Start of the provision of ground handling services

(a) A GHSP shall start operating at an aerodrome when it fulfils all the following conditions:

(1) the GHSP has declared its activity to the competent authority;

(2) if applicable, the GHSP has established formal arrangements with the certified aerodrome operator where it intends to provide GH services;

(3) if applicable in accordance with the European Council Directive 96/67/EC, the GHSP has been granted approval to provide GH services at that aerodrome.

(b) The GHSP already operating at an aerodrome within the scope of Regulation (EU) 2018/1139 at the date of application of this regulation shall only submit a declaration to their competent authority.

Rationale

This implementing rule establishes the prerequisites for a GHSP to start operating at an aerodrome.

It clarifies what is required of a GHSP already operating at an aerodrome before this regulation becomes applicable.

This rule also ensures connection with the Directive 96/67/EC on market access. A GHSP may not operate at a certain aerodrome that is subject to Directive 96/67/EC without having received the authorisation from the competent authority or aerodrome managing body (depending how the above-mentioned Directive is implemented in the national legislation of each Member State), to provide services at that aerodrome. At the same time, the GHSP may not provide services without having declared itself to the competent authority first.

In relation to the Directive and self-handling organisations, self-handling is usually permitted on aerodromes unless there is lack of space. If there are some constraints with regard to the available space or capacity at an airport which do not permit self-handling, this is established via an exemption (Art. 9 of the Directive). As per the Directive 96/67/EC, unless otherwise specified by the aerodrome operator, organisations performing self-handling do not need an authorisation to provide self-handling in the conditions specified in the Directive.

Article 17 of the same Directive, which states that the safety of operations is left to the responsibility of the Member States, established the link between the Directive and this regulation. The Directive text would have to replace the reference to Member States with a reference to the EU.

GM1 ORGH.GEN.115(b) Start of the provision of GH services

The GHSP can already start preparing its organisation as per the declaration even before the completion of formalities to receive authorisation to operate at an aerodrome where Council Directive 96/67/EC might apply to their services. In such a case, the GHSP can indicate, as evidence of its intentions, an initial letter of

intent or any other document that indicates that the GHSP has already received or is in the process of being granted authorisation to operate at that aerodrome.

The intention of the implementing rule is to set up the right order of these steps, in order to minimise the efforts that the GHSP is putting into starting operation at an aerodrome that restricts access as per the aforementioned Council Directive.

ORGH.GEN.120 Means of compliance

(a) Alternative means of compliance to the acceptable means of compliance (AMC) adopted by the Agency may be used by a GHSP to establish compliance with Regulation (EU) 2018/1139 and its delegated and implementing acts.

(b) When a GHSP intends to use alternative means of compliance to the acceptable means of compliance adopted by the Agency, the GHSP shall notify to the competent authority the list of alternative means of compliance it uses to establish compliance with Regulation (EU) 2018/1139 and its delegated and implementing acts.

Rationale: This implementing rule enables the GHSP to develop its own means to comply with the implementing rules. As per the Basic Regulation, 'alternative means of compliance' means those means that propose an alternative to an existing Acceptable Means of Compliance (AMC) or those that propose new means to establish compliance with Regulation (EU) 2018/1139 (Regulation (EC) No 216/2008 for CH, IS, LI and NO) and its Implementing Rules for which no associated AMC have been adopted by the Agency´.

The complexity of the aviation sector makes it impossible to regulate aviation without having different levels of regulatory text. While in some cases it is appropriate, and even necessary, to use binding rules (Regulations), in other cases some flexibility needs to be provided by the regulatory system, through the use of non-binding standards (soft law). This need for a balanced approach has been universally recognised and has been implemented by all international organisations and national regulators.

AMCs are non-binding standards adopted by EASA to illustrate means to establish compliance with the Basic Regulation and its Implementing Rules.

The AMCs issued by EASA are not of a legislative nature. They cannot create additional obligations on the regulated persons, who may decide to show compliance with the applicable requirements using other means. However, as the legislator wanted such material to provide for legal certainty and to contribute to uniform implementation, it provided the AMC adopted by EASA with a presumption of compliance with the rules, so that it commits competent authorities to recognise regulated persons complying with EASA AMC as complying with the law.

Since AMCs are non-binding, the GHSP may choose alternative means to comply with the rule. In this case, however, they lose the presumption of compliance provided by the EASA AMC and need to demonstrate to their competent authorities that they do comply with the law.

This draft rule may suffer further changes, as discussions between the Legal departments of EASA and the Commission are ongoing.

AMC1 ORGH.GEN.120 Means of compliance

DEMONSTRATION OF COMPLIANCE

(a) In order to demonstrate that the implementing rules are met, a risk assessment should be completed and documented. The result of this risk assessment should demonstrate a level of safety that is acceptable to the competent authority, taking into account the level of safety established by the corresponding Acceptable Means of Compliance (AMC) adopted by the Agency, when available.

(b) The result of the risk assessment forms an integral part of the management system records to be managed in accordance with ORGH.MGMT.230 Documents and records.

ORGH.GEN.130 Management of changes

(a) As part of its management system referred to in ORGH.MGMT.200, if the GHSP intends to make a change to its organisation, management system, ground handling service manual or training programme, it shall:

(1) ensure a comprehensive assessment of the change;

(2) determine if and how the changes will affect other organisations and if necessary, plan and conduct a safety risk assessment in coordination with those organisations;

(3) align mitigations with any affected parties in a systematic way;

(4) ensure that complete and valid arguments, evidence and safety criteria are established and documented to support the safety assessment, and that the change supports the improvement of safety whenever reasonably practicable.

(b) The GHSP shall inform the competent authority, without undue delay, of any changes to the declaration and submit an amended declaration.

(c) The GHSP shall provide the competent authority with the relevant documentation covering point (a) in due time for an audit or inspection.

Rationale

This rule is aligned with the equivalent rules in Reg. (EU) No 139/2014 on aerodromes (ADR.OR.B.040 and ADR.OR.F.025) and Reg. (EU) No 965/2012 on air operations (ORO.GEN.130).

For further AMC, see also AMC1 ADR.OR.D.005(b)(6) and related GM1 ADR.OR.D.005(b)(6).

GM1 ORGH.GEN.130 Management of changes

NOTIFICATION OF CHANGES TO THE COMPETENT AUTHORITY

(a) The GHSP is not expected to inform the competent authority every time it changes its documentation. For example, an amendment to the ground handling service manual, a procedure, the training programme, or the GSE maintenance programme does not need to be notified to the competent authority.

The GHSP only needs to ensure that the competent authority has the latest updates of the GHSP's documentation, including the items mentioned above, in due time before an inspection or audit.

(b) Only significant changes to its declaration need to be notified. For example, changes related to:

(1) The name of the organisation;

(2) The accountable manager or station representative - name or contact details;

(3) Adding or removing aerodromes where it provides services;

(4) Adding or removing services to be provided at an aerodrome included in the declaration;

(5) New or amended AltMoC;

(6) Adoption of an industry standard; expiration of the industry standards on an aerodrome;

(7) Adding, removing or change organisations providing third-party services or services provided by third-party organisations;

(8) Adding or removing a GSE type used at an aerodrome.

The rest of changes do not require a change of the declaration. The GHSP must only submit to the CA all updated documentation before an announced audit or inspection by the competent authority.

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

ASSESSMENT OF CHANGES

(a) A safety (risk) assessment of a change can be done by following these steps:

(1) identify the scope of the change;

(2) identify the hazards;

(3) determine the safety criteria applicable to the change;

(4) assess the harmful effects or improvements in safety related to the change and, if required, apply mitigation measures to ensure the change meets the applicable safety criteria;

(5) verify that the change addresses the scope that was subject to the safety assessment, and that it meets the safety criteria, before the change is applied; and

(6) specify the necessary monitoring actions to ensure that the provision of service will continue to meet the safety criteria after the change has been applied.

(b) The scope of the safety assessment includes the following elements and their interaction:

(1) the operation, management, and human resources being changed;

(2) the interfaces and interactions between the elements being changed and the rest of the system;

(3) the interfaces and interactions between the elements being changed and the operational context in which they are intended to perform; and

(4) the full lifecycle of the change from conception to operations.

(c) The safety criteria used for the safety assessment of a change:

(1) are compatible or are the same with the safety criteria of the air operator and, if applicable, the aerodrome operator;

(2) are defined as per the procedures for the management of changes contained in its GHS manual;

(3) depending on the availability of data, are specified with reference to explicit quantitative acceptable safety risk levels, recognised standards, the safety performance of the existing or a similar system.

Rationale

GM is similar to GM1 ADR.OR.F.025(d). Its purpose is to help GHSP to manage the changes to any component of its management system.

ORGH.GEN.140 Access

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

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

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

Rationale

This rule is intended to facilitate access to the GHSP's facilities or documentation to the competent authority or an entity appointed by it for inspection and audit purposes. It is aligned with all the other regulations in the aviation domain (air operations, aerodromes, ATM/ANS, aircrew, airworthiness, etc.).

ORGH.GEN.150 Findings and corrective actions

After the competent authority has communicated a finding to a GHSP in accordance with ARGH.OVS.330 of Annex II to this Regulation, the GHSP shall take the following steps within the time period determined by the competent authority:

(a) identify the root cause of the non-compliance;

(b) develop a corrective action plan;

(c) demonstrate the implementation of the corrective action plan to the satisfaction of the competent authority within the period agreed with that authority in accordance with ARGH.OVS.330 of Annex II to this Regulation.

Rationale

This rule is aligned with ADR.OR.C.020, ORO.GEN.150 and DTO.GEN.150.

ORGH.GEN.155 Immediate reaction to a safety problem

(a) The GHSP shall implement:

(1) any safety measures mandated by the competent authority in accordance with ARGH.GEN.135 and

(2) any relevant mandatory safety information issued by EASA.

(b) Furthermore, the GHSP shall inform the aircraft operator to which it provides services of any changes to its management system or operational procedures that may affect the provision of services.

Rationale

This rule is aligned with the latest proposed amendments to ORO.GEN.155 and ADR.OR.C.025 (not yet adopted) stemming from RMT.0681.

Furthermore, to ensure the communication of relevant information from the GHSP to the aircraft operator to which it provides services, point (b) has been added in case any changes stemming from point (a) may affect the way in which the GH services are provided to the aircraft operator(s).

ORGH.GEN.160 Occurrence reporting

(a) As part of its management system, the GHSP shall establish and maintain an occurrence reporting system, including mandatory and voluntary reporting, that meets the requirements of Regulation (EU) No 376/2014 and Regulation (EU) 2018/1139, as well as the delegated and implementing acts adopted on the basis of these regulations.

(b) The GHSP shall report to the competent authority and to any other organisation required by the State where the aerodrome is located any safety-related event or condition that endangers or, if not corrected or addressed, could endanger an aircraft, its occupants or any other person, and in particular any accident or serious incident.

(c) Without prejudice to other reporting obligations, the GHSP shall transmit occurrence reports to the aerodrome operator, the aircraft operator, and, if relevant, to the air traffic service provider, using the reporting system established by those organisations.

(d) When relevant and without prejudice to other reporting obligations, the GHSP shall transmit occurrence reports to the manufacturer of the ground support equipment.

(e) When relevant and without prejudice to Regulation (EU) No 376/2014 and the delegated and implementing acts adopted on the basis thereof, the GHSP shall produce a follow-up report for the use of the organisations mentioned in point (c), providing details of actions it intends to take to prevent similar occurrences in the future, as soon as these actions have been identified. That report shall be made in a form and manner established by the competent authority.

(f) The GHSP shall transmit:

(1) reports required in point (b) as soon as practicable, but no later than 72 hours after the GHSP became aware of the occurrence, unless exceptional circumstances prevent this;

(2) reports required by point (c) within 30 days from the date of notification of the occurrence by the person who reported the event.

(g) Reports required by points (b) and (c) shall:

(1) be made in a form and manner established by the competent authority;

(2) contain all pertinent information about the condition known to the GHSP.

Rationale:

This rule is drafted in alignment with ORO.GEN.160, ADR.OR.C.030 and ADR.OR.F.050 for apron management services (AMS) as last amended through Regulation (EU) 2020/1234 ensuring the transposition of requirements of Reg. (EU) No 376/2014 on occurrence reporting into the EASA domains (draft Opinion of RMT.0681).

It is in link with the next requirement, which together ensure the implementation of a formalised process of exchanging safety relevant information among the organisations that operate on the same aerodrome and contribute to the safety of the same operations.

Points (a) and (c) transpose BR Ann. VI pt. 4.2.2, which states:

> *"4.2.2. The provider shall establish an occurrence reporting system as part of the management system under point 4.2.1 in order to contribute to the aim of continuous improvement of safety. Without prejudice to other reporting obligations, the provider shall transmit all occurrences to the reporting system of the aerodrome operator, the aircraft operator and, if relevant, to that of the air traffic service provider. The occurrence reporting system shall be compliant with the applicable Union law."*

As per Reg. (EU) No 376/2014, the following natural persons shall submit a report: "Art. 4.6: (g) a person who performs a function connected with the ground handling of aircraft, including fuelling, loadsheet preparation, loading, de-icing and towing at an airport covered by Regulation (EC) No 1008/2008."

The details of reportable events are listed in Commission Implementing Regulation (EU) 2015/1018 laying down a list of classifying occurrences in civil aviation to be mandatorily reported according to Regulation (EU) No 376/2014 of the European Parliament and of the Council. The reportable events by GHSP are reproduced in a GM below.

Point (d) contains a new element, which is the reporting to the manufacturer of GSE, as relevant and rather typical for the GH activities, in case of malfunction of a piece of equipment which may endanger the safety of a person, an aircraft, other vehicles or the environment. Once the root cause analysis indicates a problem with the equipment design, production or functionality, or of any other nature, this should be taken over and addressed by the equipment manufacturer.

AMC1 ORGH.GEN.160 Occurrence reporting

REPORTING PROCEDURES

The GHSP should establish procedures to be used for reporting to the competent authority and to any other organisation, as required, which include:

(a) the description of the applicable requirements for the purpose of reporting;

(b) the description of the reporting mechanism, including reporting forms, means, and deadlines;

(c) responsibilities of the GHSP and personnel involved in maintaining the reporting system;

(d) safeguards to ensure confidentiality of the reporter and protection of personal data; and

(e) the description of the mechanism and personnel responsibilities for identifying root causes, and the actions that may be needed to be taken to prevent similar occurrences from happening in the future, as appropriate.

Rationale

This AMC is copied from AMC1 ADR.OR.F.055(a), applicable to apron management service providers.

AMC1 ORGH.GEN.160(e) Occurrence reporting

FOLLOW-UP REPORT

(a) The GHSP should ensure that the reporting process ends with clear follow-up actions. The follow-up report should include at least the following steps:

(1) The investigation of an occurrence and the analysis that led to the identification of the root cause;

(2) The results of the investigation;

(3) The conclusions of an occurrence;

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

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

(b) The GHSP should ensure that the investigation team includes one front-line employee who is competent in the area subject to the occurrence and trained in occurrence investigation.

GM1 ORGH.GEN.160(a) Occurrence reporting

REPORTABLE EVENTS

The following reportable events reproduced below are published in Annex IV to Regulation (EU) 2015/1018 Occurrences related to aerodromes and ground services, points 1 and 2.

GROUND HANDLING OF AN AIRCRAFT

(a) **Aircraft- and aerodrome-related occurrences**

(1) A collision or near collision, on the ground or in the air, between an aircraft and another aircraft, terrain or obstacle (obstacle includes vehicle).

(2) Runway or taxiway incursion.

(3) Runway or taxiway excursion.

(4) Significant contamination of aircraft structure, systems and equipment arising from the carriage of baggage, mail or cargo.

(5) Push-back, power-back or taxi interference by vehicle, equipment or person.

(6) Foreign object on the aerodrome movement area which has or could have endangered the aircraft, its occupants or any other person.

(7) Passengers or unauthorised person left unsupervised on apron.

(8) Fire, smoke, explosions aerodrome facilities, vicinities and equipment which has or could have endangered the aircraft, its occupants or any other person.

(9) Aerodrome security-related occurrences (for example: unlawful entry, sabotage, bomb threat).

(10) Jet blast, rotor down wash or propeller blast effect.

(11) Absence of reporting of a significant change in aerodrome operating conditions which has or could have endangered the aircraft, its occupants or any other person.

(b) **Degradation or total loss of services or functions**

(1) Loss or failure of communication with aircraft, vehicle, air traffic services unit or apron management service unit.

(2) Significant failure, malfunction or defect of aerodrome equipment or system which has or could have endangered the aircraft or its occupants.

(3) Significant deficiencies in aerodrome lighting, marking or signs.

(4) Rescue and firefighting services not available according to applicable requirements.

(1) Failure of the aerodrome emergency alerting system.

(c) **Ground handling specific occurrences**

(1) Incorrect handling or loading of passengers, baggage, mail or cargo, likely to have a significant effect on aircraft mass and/or balance (including significant errors in loadsheet calculations).

(2) Boarding equipment removed leading to endangerment of aircraft occupants.

(3) Incorrect stowage or securing of baggage, mail or cargo likely in any way to endanger the aircraft, its equipment or occupants or to impede emergency evacuation.

(4) Transport, attempted transport or handling of dangerous goods which resulted or could have resulted in the safety of the operation being endangered or led to an unsafe condition (for example: dangerous goods incident or accident as defined in the ICAO Technical Instructions).

(5) Non-compliance on baggage or passenger reconciliation.

(6) Non-compliance with required aircraft ground handling and servicing procedures, especially in de-icing, refuelling or loading procedures, including incorrect positioning or removal of equipment.

(7) Significant spillage during fuelling operations.

(8) Loading of incorrect fuel quantities likely to have a significant effect on aircraft endurance, performance, balance or structural strength.

(9) Loading of contaminated or incorrect type of fuel or other essential fluids (including oxygen, nitrogen, oil and potable water).

(10) Failure, malfunction or defect of ground equipment used for ground handling, resulting into damage or potential damage to the aircraft (for example: tow bar or GPU (Ground Power Unit)).

(11) Missing, incorrect or inadequate de-icing/anti-icing treatment.

(12) Damage to aircraft by ground handling equipment or vehicles including previously unreported damage.

(13) Any occurrence where the human performance has directly contributed to or could have contributed to an accident or a serious incident.

Rationale

This GM reproduces the list of reportable events from Annex IV to Regulation (EU) 2015/1018 Occurrences related to aerodromes and ground services. The list is further simplified, the aerodrome list, which duplicates the GH list over more than 75% reportable events has not been copied here, to avoid any misunderstandings. However, some elements from the list of reportable events specific to aerodrome personnel have been copied to this list because it is important that those events are reported, regardless of whether the reporting person is employed by the aerodrome operator or by a GHSP. These additional elements taken from the aerodrome list are reflected in points (a)(10), (11) and (12) and (b)(4) and (5).

GM1 ORGH.GEN.160(d) Occurrence reporting

FOLLOW-UP REPORT

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

ORGH.GEN.165 Use of alcohol, psychoactive substances and medicines

The GHSP shall implement a procedure regarding the consumption of alcohol, psychoactive substances and medicines. This procedure shall clarify that such persons:

(a) shall not consume alcohol during their duty period;

(b) shall not perform any duties under the influence:

(1) of alcohol, or any psychoactive substance; or

(2) any medicine that may have an effect on his/her abilities in a manner contrary to safety.

GM1 ORGH.GEN.165 Use of alcohol, psychoactive substances and medicines

ICAO GUIDANCE

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

SUBPART MGMT — MANAGEMENT SYSTEM (MGMT)

ORGH.MGMT.200 Management system

(a) The GHSP shall implement and maintain an integrated management system including a safety management system.

(b) The management system shall be proportionate to the scope of the GHSP's activities and the complexity of its organisation, taking into account the hazards and associated risks inherent in these activities and structures.

(c) The management system shall include:

(1) clearly defined lines of accountability and responsibility throughout the organisation, including a direct accountability for safety on the part of the senior management;

(2) a single-policy statement covering all the relevant aspects of its organisation. It shall contain a description of the overall principles of the GHSP with regard to safety, referred to as the safety policy, signed by the accountable manager;

(3) a safety management system to include the following elements:

(i) safety objectives for the GH activities performed by the organisation;

(ii) identification of hazards in ground handling operations;

(iii) safety risk assessment and risk mitigation in the provision of ground handling services;

(iv) means to verify the safety performance of the GHSP by means of indicators and targets, and to validate the proportionality and effectiveness of safety risk mitigations;

(v) a process to promote safety within the organisation, with the purpose of fostering a safety culture within the organisation. This shall include means for safety communication that ensures that personnel are fully aware of the safety management system components, and convey safety critical information;

(4) a process to manage changes;

(5) a training programme that ensures that personnel involved in the provision of ground handling services are adequately trained and competent to perform the safety-related duties and that they are familiarised with the rules and procedures relevant to GH operations and the relationship of their functions and tasks to the operation as a whole;

(6) a process to monitor compliance of the GHSP with the applicable requirements. Compliance monitoring shall include feedback on findings to the accountable manager to ensure effective implementation of corrective actions as necessary.

(d) The GHSP shall document all management system key processes in the ground handling service manual.

Integration of ground handling elements into an existing management system

(e) Notwithstanding points (a) to (d), if the organisation providing GH services already has a management system developed under another EU regulation covering an aviation domain, it shall integrate the elements related to GH services into its existing management system in accordance with this Annex.

(f) That organisation shall identify the following elements in its structure and documentation:

(1) the certified or declared organisations that are covered by its management system;

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

(3) applicable requirements for each domain.

This rule implements the BR provision of Annex VII pt. 4.2.1 (SMS components in the management system).

Point (b) provides the necessary flexibility to adjust the management system to the type of activities provided by a GHSP but also to the size and complexity of its organisation. This should cater for different cases; for example:

1. *A provider of aircraft cleaning services. This organisation provides only one type of GH services and from the safety perspective, the main concern is the operation of the vehicle approaching and departing from the aircraft, as well as the use of accepted cleaning products for the aircraft.*
2. *A GHSP can have only a handful of employees and provide only one type of GH service – de-icing/anti-icing, or GH supervision, which can be considered rather complex activities, where the SMS should cover more than one or two aspects, the safety risks are more diverse, and the subsequent safety risk assessment and mitigations should be more extensive. However, the structure of such organisations could be simple, and with a reduced number of staff, with few or no subcontracted services, operating a reduced number of GSE, the management system of such an organisation could be a small-scale one, adjusted to only one type of service.*
3. *At the other end of the spectrum, there are GHSP providing many types of GH services, operating at multi-national level, with thousands of employees, a GSE park of hundreds of vehicles, and numerous outsourced services; these would be both complex and large organisations, and their management system is expected to be diverse and complex.*
4. *From another perspective, where the concept of 'size' of an organisation does not make much sense, there could be a GHSP that provides a wide range of activities (possibly typical for a GHSP operating for general aviation operators) but could be rather small in terms of number of employees, outsourced providers, etc.*

It is not expected that a GHSP fitting the first or second example from above develops an extensive management system, as their organisational structure is expected to be rather simple and the services provided are less complex. In the first example, the management system of such an organisation should be rather short and simple, and their SMS should address mainly the safety risk assessment related to the driving and maintenance of the GSE, the training of the personnel to perform their tasks in a competent manner, and the compliance with the list of products approved for aircraft cleaning. In the second example, the management system with the SMS component should include additional layers compared to example #1. A GHSP fitting the third example description is expected to develop and implement an ample management system to address all the safety risks of its organisation and services provided.

Point (c)(1) extends the direct accountability for safety to the entire senior management group of the organisation, instead of only the accountable manager.

Point (c)(7) reflects the safety promotion. It ensures the basis for the development of a safety culture and just culture material in the soft law.

The concept of an integrated management system

This implementing rule enables an organisation to develop an integrated management system.

Two perspectives are considered when referring to an integrated management system:

On the one hand, this refers to the various subsystems of an organisation that is only providing GH services. It has no additional certificates, authorisations or other declarations. For such an organisation, the integrated management system would include any of the following components: safety management system, quality

management system, security, occupational health and safety, human resources, financial, commercial, and everything else that functions like a subsystem within the GHSP's management system.

On the other hand, the term also encompasses other functions that the organisation may perform. This is the case, for example, of an aerodrome operator that also provides GH services; or a large organisation that is at the same time an AOC holder that has an approved training organisation (ATO), an SPO declaration PLUS an authorisation for high-risk SPO, a Part-145 certificate, and is also a self-handling GHSP. The integrated management system of such a legal entity would allow it to have a single management system that would integrate all the components of its various organisations instead of 5 different management systems. This means: one compliance monitoring system instead of 5, one manual (which may still include several volumes if the organisation decides so) instead of 5, one SMS to include all its organisations instead of 5; one set of procedures for personnel, access, facilities, etc. instead of 5.

By aligning this rule with all its equivalent rules in the other EASA domains, this will enable a smooth integration of all those separate elements of the management systems of the various certificates, authorisations and declarations into one comprehensive management system – with common elements properly identified, documented, and implemented only once instead of 5 times differently.

Points (e) and (f):

These paragraphs are intended to enable the integration of the GH elements into the management system of an AOC holder or aerodrome operator when those are providing ground handling services.

As per the Basic Regulation, the definition of self-handling refers only to aircraft operators, not to aerodrome operators. However, today's reality indicates that many aerodrome operators provide also ground handling services. With the new GH regulation becoming applicable, aerodrome operators providing GH services will have to comply with the applicable requirements of this Regulation especially the specific GH operational procedures and SMS elements related to the GH activities that may not yet be included in their certification process.

The same applies to providers of apron management services that also perform GH services.

At the same time, it is important that the organisations providing GH services – be it aerodrome operators, AMS providers or aircraft operators comply with the requirements related to the notification of their competent authority of the GH services provided at each aerodrome through a declaration or other means.

The rule is aligned with ORO.GEN.200 and ADR.OR.F.045 for apron management service providers.

Stakeholders are invited to comment whether this rule is appropriate for both large and complex organisations and for smaller and simpler organisations.

More AMC&GM will be added to support its implementation. To address the safety policy, hazard identification, safety risk assessment and mitigation, safety performance monitoring, safety promotion and communication, continuous improvement of the SMS, SMS training, compliance monitoring.

AMC1 ORGH.MGMT.200(c)(4) Management system

PROCESS TO MANAGE CHANGES

(a) The GHSP should cover the following aspects in the process of managing the changes to its management system and provision of services:

(1) identify changes within the GHSP's organisation, its management system, or the provision of ground handling services, which may affect the established processes, procedures and services;

(2) describe the measures taken to ensure safety performance before implementing changes;

(3) eliminate or modify safety risk mitigations that are no longer needed or effective due to changes in the operational environment;

(4) review the management system, identify the cause(s) of not reaching its safety performance targets, determine the implications of such substandard performance in operations, and eliminate or mitigate such cause(s);

(5) coordinate its emergency response procedures with the emergency response plans of the aerodrome operator and the aircraft operators to which it provides services;

More material will be added, also to address the building and implementation of an effective management system.

GM1 ORGH.MGMT.200(c)(1) Management system

SENIOR MANAGEMENT

Senior management is usually a group consisting of the persons whose functions are performed at the highest level of management in the organisation, immediately below the board or directors.

Other terms used: executive management, upper management, management team.

For the purpose of this Regulation, senior management includes the accountable manager.

Small organisations may have a reduced structure for the senior management, where several functions can even be fulfilled by a single person.

GM1 ORGH.MGMT.200(c) Management system

GUIDANCE FOR SMALL ORGANISATIONS ON BUILDING AN SMS – EXCERPTS FROM ICAO DOC 10121

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

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

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

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

More material will be added to support the implementation of ORGH.MGMT.200 by small organisations.

GM1 ORGH.MGMT.200(c)(7) Management system

GOOD PRACTICES IN BUILDING A SAFETY CULTURE

(1) There should be opportunities for management and operational staff to engage to discuss operational risks and promote a positive safety culture.

(2) The organisation's senior management should be aware of the top operational risks, "hotspots", and key safety objectives.

(3) Frontline staff representatives should be involved in safety activities including hazard identification, procedures development, change management and safety risk management.

(4) Senior management should be involved in safety culture promotion activities. One of the core safety culture messages to GHSP staff is that by working safely and not taking risks, and by looking out for each other, everyone gets to go home safely at the end of the day.

(5) It is recommended that all levels of management are trained on safety, safety culture and just culture.

(6) The GHSP should undertake periodic assessments of safety culture (e.g. at least every five years).

(7) The GHSP should develop a plan to address gaps and deficiencies identified during the safety culture assessment.

(8) Results of the safety culture assessments and action plans should be communicated throughout the organization.

(9) Staff should be empowered to stop an operation they feel is unsafe.

(10) Staff should always be given the equipment they need to work safely, and encouraged to use appropriate safety protective equipment (e.g. PPE, ear protection, high visibility jackets, etc.).

(11) Staff should not feel pressure to come into work when unfit to do so.

More material will be added.

ORGH.MGMT.200A Information security management system

The GHSP shall establish, implement and maintain an information security management system in accordance with Delegated Regulation (EU) 202X/XXXX in order to ensure the proper management of information security risks which may have an impact on aviation safety.

Rationale

This text is integrated in this draft regulation as proposed in Opinion 03/2021 on cybersecurity (currently in discussions at the Commission). The text may be further changed during the adoption process.

Tis IR is not expected to receive any comments, as it is already part of an opinion in the adoption process. It is included here only for information purposes.

ORGH.MGMT.205 Contracted activities

(a) When contracting or purchasing any services or products as a part of its activities, the GHSP shall ensure that:

(1) the contracted or purchased services or products comply with the applicable requirements, depending on the nature of the service;

(2) any aviation safety hazards associated with contracted or purchased services or products are taken into consideration by the GHSP's management system.

(b) When the GHSP contracts any part of its activity to an organisation that is not itself formally authorised or subject to a declaration regime in accordance with this Annex to carry out such activity, the contracted organisation shall work under the approval of the GHSP. The GHSP as the contracting organisation shall ensure that the competent authority is given access to the contracted organisation, to determine continued compliance with the applicable requirements.

Rationale: This implementing rule is intended to cover services that the GHSP does not provide itself, but which it contracts in order to provide the GH services as required by its contract with the aircraft operator and in compliance with this Regulation. The Cover Regulation now

In the case of a non-EU centralised load control (CLC) organisation or other GH service, as per ORO.GEN.205 of Reg. (EU) 965/2012, the AOC holder (certified organisation) or the SPO authorisation holder (for now, the rule only includes certified and authorised organisations, not organisations regulated under a declaration regime) must ensure that the safety hazards associated with contracted or purchased services are considered by the air operator's management system. When such air operators contract services that are not certified or authorised in accordance with Annex III (Part-ORO) of Reg. (EU) 965/2012, those contracted service providers must work under the approval of the air operator; the air operator needs to include the contracted activities under its safety management and compliance monitoring programmes.

The implementing rule ORO.GEN.205 and the related AMC&GM will be adjusted to align with this Regulation and to include also declared organisations.

In practice, this means that the GH service providers such as a non-EU CLC will not be audited directly by the EU competent authority since the services provided are not at an aerodrome in the EU and they are therefore not covered by the GH regulation. Such GHSP will be audited by the air operator to which they provide their services and will have to have a written agreement with the air operator to establish the applicable standards and applicable requirements (see AMC1 ORO.GEN.205, paragraph (b)). Then the competent authority can indirectly verify adherence of this CLC or GHSP to the EU relevant requirements when performing the inspection of the aircraft operator.

AMC1 ORGH.MGMT.205 Contracted activities

RESPONSIBILITY FOR CONTRACTING ACTIVITIES

(a) The GHSP may decide to contract certain activities to external organisations, including other GHSP.

(b) A written agreement should exist, whenever possible, between the GHSP and the contracted organisation clearly defining the contracted activities, the applicable requirements and the responsibilities of both parties.

(c) When selecting the providers of contracted services, the GHSP should consider, if applicable, relevant references and criteria such as safety and security aspects.

(d) The contracted safety-related activities relevant to the agreement should be included in the GHSP's safety management and compliance monitoring programmes.

(e) The GHSP should ensure that the contracted organisation has the necessary authorisation or approval when required, its products comply with the recognised industry standards, and commands the resources and competence to undertake the task.

(f) When necessary, the GHSP should inform the aircraft operator of the change of the provider of the contracted services.

GM1 ORGH.MGMT.205 Contracted activities

(a) If the contracted activity is a GH service as identified in Article 1 of this Regulation, then the provider of those services is bound to comply with this Regulation. Such contracted ground handling services include de-icing and anti-icing activities, fuelling, refuelling and defueling activities, passenger handling, baggage handling, etc.

(a) The exceptions from point (a), as stipulated in point ARGH.GEN.100 and point GH.OPS.005 of this Regulation, are the load control services and the flight dispatch services. These services, when contracted to a third-party provider, are covered by the requirements of ORO.GEN.205 of Regulation (EU) No 965/2012.

(1) The aircraft operator is responsible to include these contracted services in its management system.

(2) The load control services need to comply with the requirements included in Subpart GH.OPS.

(3) The flight dispatch services need to comply with the requirements included in Annex III (Part-ORO) of Regulation (EU) 965/2012.

(b) If the contracted activity is not a GH service as identified in Article 1 of this Regulation, then other requirements may apply, depending on the type of contracted activity or product. For example, the provision of computer applications, electronic devices, vehicles and any other necessary equipment, tool, service, etc. used for the provision of GH services.

ORGH.MGMT.210 Personnel

(a) As part of its management system, the GHSP shall:

(1) appoint an accountable manager, who has the accountability and authority to ensure that all activities can be financed and carried out in accordance with this Regulation. The accountable manager shall be responsible for establishing and maintaining an effective management system;

(2) nominate a person responsible for the development, maintenance and day-to-day management of the safety management system components. That person shall act independently of other managers within the organisation, shall have direct access to the accountable manager and to appropriate management for safety matters, and shall be responsible to the accountable manager;

(3) nominate a person responsible for the safety management of GH activities at each station where it provides services;

(4) assign a sufficient number of persons to supervise the GH personnel, considering the structure of the organisation and the number of personnel employed.

(i) Their duties and responsibilities shall be well defined, and any other arrangements shall be made to ensure that they can discharge their supervisory responsibilities.

(ii) The personnel supervision function shall be exercised by competent individuals with the skills to ensure the achievement of standards specified in the GHS manual.

(5) nominate a person responsible for the training of GH personnel.

(b) The GHSP shall nominate a person or a group of persons with the responsibility to ensure that the organisation remains in compliance with the applicable requirements. They shall be ultimately responsible to the accountable manager.

(c) Without prejudice to points (a) and (b), in small organisations with a reduced number of personnel, the same person may fulfil more than one role, provided that they are trained and qualified to perform the assigned tasks and that any conflict of interest raised by the assigned functions is addressed.

(d) The GHSP shall have sufficient qualified personnel for the planned tasks and activities to be performed in accordance with the applicable requirements.

(e) The GHSP shall ensure that the nominated persons and the personnel involved in the provision of ground handling services

(1) are adequately trained in accordance with the training programme, and that their qualification and competencies are properly maintained;

(2) demonstrate their capabilities in the performance of the assigned duties;

(3) are aware of their responsibilities and the relationship of their duties to the operation as a whole.

(f) If the GH services are provided by the aircraft operator or aerodrome operator, those organisations shall ensure that the requirements of points (a) to (e) are included in their established allocation of responsibilities within their management system.

Rationale: This rule ensures implementation of BR Annex VII pt. 4.1 (a). It is aligned with ORO.GEN.210, ADR.OR.D.015, ADR.OR.F.065.

Point (a)(2) means a nominated person (a postholder) for the safety management of GH services per the entire organisation.

Point (a)(3) means a nominated person (postholder) for safety management at each aerodrome where the GHSP provides services.

Point (a)(4) is about supervisors.

Point (a)(5) means a nominated person for the training requirements.

Point (b) is about a group of persons or only one person who ensures that the GHSP is compliant with the applicable requirements. This group should ensure the compliance monitoring function, which could be assigned to one person in small organisations or to a group of persons in a more complex organisation.

Point (d) transposes BR Ann VII pt. 4.1.(e).

Point (e) is about training and competence of personnel.

Point (f) ensures the implementation of an integrated management system by organisations that already have a management system, such as aerodrome operators or aircraft operators.

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

SAFETY MANAGEMENT FUNCTIONS

(a) The functions of the safety manager should be to:

(1) Act as a focal point for the safety aspects of the GH activities, as per ICAO Doc 9859 (Ch. 9.3.6)

(2) Monitor safety concerns in aviation industry;

(3) Coordinates and communicates with the competent authority;

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

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

(6) provide periodic reports on safety performance;

(7) ensure maintenance of safety management documentation;

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

(9) provide independent advice on safety matters; and

(10) ensure initiation and follow-up of internal occurrence investigations.;

(11) if more than one person, depending on the size of the organisation and scale of operations, this function may have more than one person to support the performance of all safety management related tasks.

(b) The safety management function should be independent from the operational line management.

Rationale

This AMC follows the model of AMC1 ORO.GEN.200(a)(1) of Reg. (EU) 965/2012.

This is the starting point for covering this topic. More material will be added to support the implementation. It is recommended that this function also undergoes a competency-based training and assessment programme.

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

SAFETY MANAGER TRAINING, SKILLS AND QUALIFICATIONS

– to include

(a) Training on SMS, human factors

(b) Experience

(1) Monitoring safety performance

(2) Conducting risk assessments

(3) Managing the safety information database (system)

(4) Performing safety audits

(5) Operation of the SMS

(6) Investigation of reportable matters and hazardous events

(7) Crisis management

(8) Safety Promotion/communication methods

(9) Understanding the role of human performance in accident causation and prevention (human factors)

(c) Soft skills

(10) Communication skills

(11) Computer skills (word-processing, spreadsheets, database mgmt.)

[to be further developed, including the aspect of training the trainer]

ORGH.MGMT.215 Facilities

The GHSP shall have facilities allowing the performance and management of all planned tasks and activities in accordance with the applicable requirements. Where the GHSP uses a warehouse to store cargo items requiring special storage or handling procedures, such as dangerous goods, the storage facility shall be compliant with the requirements of ICAO Annex 18 and the Technical Instructions.

Rationale

This implementing rule ensure compliance with BR Annex VII pt. 4.1 (a).

However, it still remains to be clarified how much this regulation should cover considering the case when the warehouse is not within the aerodrome premises.

ORGH.MGMT.220 Interfaces with other organisations

(a) The GHSP shall cooperate with the aerodrome operator and the aircraft operator(s) to which it provides services with the purpose to:

(1) reconcile the differences, in order to ensure that the safety systems are compatible and complementary and to promote a common understanding of hazards, risks, incidents, etc. This activity shall be connected with the collaborative decision-making process initiated by an aerodrome operator;

(2) develop and maintain interface programmes to cover the safety management elements of their common operation where this is the case.

Such a process shall be documented.

(b) Such an interface shall enable sharing of safety relevant information on a regular basis and on any other intervals considered relevant within a given context between the stakeholders involved in the GH activities.

(c) The GHSP shall ensure that the safety procedures included in its management system are coordinated and interfaced with those of the aerodrome operator and the aircraft operators to which it provides services at that aerodrome.

Rationale

This rule is intended to create the link of safety risk management, safety assurance and safety promotion between the GHSP, aircraft operator and aerodrome operator. This is included also in the aerodrome requirements (see ADR.OR.D.025) as a responsibility of the aerodrome operator to ensure cooperation with other organisations.

It is likely that the Air OPS regulation may have to be amended accordingly, to ensure full communication between all the actors involved in GH activities.

AMC1 ORGH.MGMT.220 Interfaces with other organisations

PROCEDURES

The GHSP should develop procedures to ensure the interfaces with the other organisations by implementing the relevant content of ICAO Doc 10121 Ground Handling Manual.

The GHSP should contribute with its own SMS and safety data to the actions initiated by the aerodrome operator to achieve a risk mitigation plan for integrated risks coming from all the users of that aerodrome.

GM1 ORGH.MGMT.220 Interfaces with other organisations

IDENTIFICATION OF INTERFACES — SAFETY RISK MANAGEMENT

(a) Hazard identification and risk assessment start with an identification of all parties involved in the GH activities, including independent experts and non-approved organisations. It extends to the overall control structure, assessing, in particular, the following elements across all subcontract levels and all parties within such arrangements:

(1) coordination and interfaces between the different parties;

(2) applicable procedures;

(3) communication between all parties involved, including reporting and feedback channels;

(4) task allocation responsibilities and authorities; and

(5) qualifications and competency of key personnel.

(b) Safety risk management focuses on the following aspects:

(1) clear assignment of accountability and allocation of responsibilities;

(2) only one party is responsible for a specific aspect of the arrangement — no overlapping or conflicting responsibilities, in order to eliminate coordination errors;

(3) existence of clear reporting lines, both for occurrence reporting and progress reporting;

(4) possibility for staff to directly notify the operator of any hazard suggesting an obviously unacceptable safety risk as a result of the potential consequences of this hazard.

Rationale

This GM is introduced to help the identification of the relevant organisational interfaces. Its model is taken over from GM4 ORO.GEN.200(a)(3).

ORGH.MGMT.225 Safety programmes

The GHSP shall participate in the safety programmes established by the aerodrome operator as per ADR.OR.D.027 and contribute to the exchange of safety relevant information and safety promotion activities implemented at the aerodrome where it provides services.

Rationale

This IR aims at linking and integrating the GHSP's activities into the safety programmes already implemented by an aerodrome operator under ADR.OR.D.027. It also enables the participation of a GHSP in a common safety approach applied by some aerodromes, such as a safety stack, if the context at that aerodrome is suitable for such models.

GM1 ORGH.MGMT.225 Safety programmes

PARTICIPATION OF GHSP IN SAFETY PROGRAMMES

Such safety programmes could include but not be limited to:

(a) Activities, meetings, information sharing sessions, and other events organised by the Aerodrome Safety Committee with the purpose to promote safety or share safety-relevant information;

(b) Safety groups, or any common project developed by all aerodrome users at an aerodrome and implemented at that aerodrome, such as developing of common safety procedures, discuss safety performance, develop common mitigation measures;

(c) Common pool of equipment used for GH operations.

Rationale

This GM is aimed at indicating ways in which the GHSP can contribute to the safety programmes implemented at an aerodrome.

While it is not reinventing the wheel, it is linking on the process to improve safety of operations at an aerodrome already published in Reg. (EU) 139/2014 on aerodromes, which strengthens the idea that if something wrong happens at an aerodrome, all users are affected, not just those directly involved in an occurrence.

Stakeholders are invited to provide suggestions to improve this GM.

ORGH.MGMT.230 Safety reporting system

As part of its management system, the GHSP shall establish and implement a safety reporting system for its personnel, in order to promote safety in ground handling services. Such a system shall meet the requirements of Regulation (EU) 2018/1139 and the delegated and implementing acts adopted on the basis thereof.

(a) As part of the process referred to in ORGH.MGMT.200(b)(3), the GHSP shall:

(1) require that its personnel use the safety reporting system for the mandatory reporting of any accident, serious incident and any other occurrence, as required by Regulation (EU) 2018/1139, Regulation (EU) No 376/2014, as well as the delegated and implementing acts adopted on the basis of those Regulations;

(2) as per Regulation (EU) No 376/2014, ensure the safety reporting system may also be used for the voluntary reporting of any safety-related event or condition that endangers or, if not corrected or addressed, could endanger safety. The GHSP may set up also a separate system for voluntary reporting.

(b) The safety reporting system shall protect the identity of the reporter, encourage voluntary reporting and include the possibility that reports may be submitted anonymously.

(c) The GHSP shall:

(1) record all reports submitted;

(2) determine which reports qualify for reporting in accordance with ORGH.GEN.160 Occurrence reporting point (b);

(3) conduct investigations of reports, as appropriate;

(4) in cooperation with the aircraft operator, or the aerodrome operator, or both, or the GSE manufacturer, 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;

(5) participate in the investigation of the reports conducted by the aircraft operator or the aerodrome operator, or both, as appropriate;

(6) based on the results of the investigation, take necessary actions to improve the safety system;

(7) provide feedback to the reporter, if possible, and decide on the appropriate means to disseminate the results;

(8) refrain from attribution of blame in line with the 'just culture' principles.

Rationale

This rule is drafted using the equivalent rule for AMS (ADR.OR.F.055) as a model. It addresses the important aspect of ensuring the exchange of relevant safety information between the participants in the same operation and an aerodrome.

AMC1 ORGH.MGMT.230 Safety reporting system

GENERAL

(a) The safety reporting system should include the possibility for voluntary reporting intended for safety hazards identified by the reporter which may have potential safety consequences.

(b) The GHSP should identify which events are mandatory to be reported as per Commission Implementing Regulation (EU) 2015/1018.

(c) The GHSP should provide the means and the format for reporting, which should be such that they meet the requirements of ORGH.GEN.160 on occurrence reporting in terms of time, format, and required information to be reported.

(d) The safety reporting system should include the acknowledgement to the reporter of the successful submission of the report.

(e) The reporting process should be as simple as possible, and well documented, including details on what, how, where, whom, and when to report.

(f) Regardless of the means or method of submission of the report, once the information is received, it should be stored in a manner suitable for easy retrieval and analysis.

(g) Access to the submitted reports should be restricted to personnel responsible for storing and analysing them.

(h) The reporter's identity should be protected, and this principle should be included in the procedures established by the GHSP for gathering additional information for further analyses or investigations.

(i) The safety reporting system should include a feedback process to inform the reporter on the outcome of the occurrence analysis.

Rationale

This AMC is copied from the Aerodrome rules applicable to apron management service providers (AMC1 ADR.OR.F.055).

GM1 ORGH.MGMT.230 Safety reporting system

THE USE OF SAFETY REPORTING

(a) The overall objective of the safety reporting system is to use reported information to improve the safety performance of the organisation, and not to attribute blame to individuals.

(b) The specific objectives of the safety reporting system are to:

(1) enable to assess the safety implications of each relevant occurrence, serious incident and accident, including similar past events, so that any necessary mitigating action can be initiated; and

(2) ensure that knowledge about such relevant occurrences, serious incidents and accidents is disseminated so that other persons and organisations may learn from them.

AMC1 ORGH.MGMT.230(a) Safety reporting system

REPORTING PROCEDURES

See AMC1 ORGH.GEN.160 Occurrence Reporting | Reporting procedure.

AMC1 or GM1 ORGH.MGMT.230 Safety reporting system

SAFETY CULTURE

(a) The GHSP should ensure that its processes developed under its management system aim at fostering a safety culture within its organisation. This should include at least the following:

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

(2) continuous development of personnel's technical competences through training, to ensure that they understand why particular safety actions are taken and why safety procedures are

introduced or changed; also so that staff become competent to draw conclusions from safety information systems, and be willing to implement safety changes;

(3) open, consistent and transparent communication and information sharing among the GH personnel regarding safety aspects, horizontally among staff, and vertically (from management to front-line personnel and vice-versa);

(4) awareness of individual safety responsibility as part of a larger aviation system. Staff should become knowledgeable about various factors: human, technical and organisational, affecting the safety of the whole system;

(5) SMS training;

(6) training on safety data analysis and occurrence investigation to the personnel participating in such activities;

(7) communication sessions aiming at helping the GH personnel understand the main safety culture concepts and become aware of the following aspects:

(i) the importance of reporting,

(ii) the outcome of reporting (meaningful, visible result),

(iii) the potential safety consequences of not reporting,

(iv) the concept of just culture and reporter's protection,

(v) the difference between an inadvertent error/mistake/lapse and an intentional act/reckless conduct;

(vi) the importance of reporting errors on a voluntary basis and of sharing experiences;

(8) facilitation of safety reporting by using simple forms, easy to find, easy to fill in, easy to submit, and ensuring full anonymity. Consider the difficulty of reporting after/during a night shift, or a difficult shift (congested traffic, severe weather conditions, etc.). In unusual or emergency situations, staff can report directly to decision makers to allow a more timely response. This builds flexibility and effectiveness of reporting;

(9) allocating sufficient resources to analyse the safety events, to identify the root causes, to provide feedback to reporters, to create a hazard register based on which to establish safety performance indicators to measure the safety objectives;

(10) ensuring full management involvement and support into these activities;

(11) involving front-line GH personnel in the investigation of an event;

(12) involving front-line personnel in development of procedures and safety processes;

…

(b) The implementation steps should cover the aspect of communication and information sharing both within the GH organisation and with the other stakeholders involved in operation at an aerodrome: aircraft operator, aerodrome operator, ATC, AMS provider, and others, as the case may be (e.g. contracted service providers relevant to the safety of operation).

(c) Review process for effectiveness of safety culture (including understanding by personnel)

GM1 ORGH.MGMT.230 Safety reporting system

STEPS TOWARDS BUILDING AND MAINTAINING A SAFETY CULTURE

The following are examples of how a GHSP could implement the steps toward fostering a safety culture within its organisation: or Typical measures for building & maintaining a safety culture committed to safety include:

(a) Safety communication

(1) Encourage staff to identify hazards, ask them to suggest solutions. Use open-ended questions to encourage discussion instead of questions that require only a 'yes' or 'no' answer.

(2) Schedule debriefings of 10-15 min. at the end of a day/shift to discuss with the whole team about how the activity went on, what was noticeable, different, outside an operational procedure, positive and negative aspects, whether something should be changed. It is important to understand why people do things the way they do. Listening is also very important.

(3) Listen to staff's concerns, without being defensive. The purpose of a briefing is to have personnel start thinking about safety problems. Practical examples can be used in the talk.

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

(5) Ensure timely and effective dissemination of safety notices and safety information to all staff.

(6) Arrange a 'display wall' in the briefing room, to post questions to the personnel, asking them for their opinion about changing an operational procedure; or informing about new changes coming from the industry standards that they apply, or the regulator, or ICAO.

(7) Arrange competitions and games that aim at increasing awareness of safety or improving safety in the day-to-day activities.

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

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

(10) Ongoing reviews of lessons learned from the organisation's own occurrence reports and safety surveys.

(11) Positive re-enforcement (praise/thanks for appropriate behaviour)

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

(b) Training

(13) Annual training plans to ensure that personnel are aware of all safety management practices and procedures applicable to their role.

(14) Annual training plans to ensure that personnel are aware of their organisation's approach to safety.

GM2 ORGH.MGMT.230 Safety reporting system

GOOD PRACTICES IN FOSTERING A SAFETY CULTURE AND A JUST CULTURE WITHIN THE ORGANISATION

Just culture, as a component of the safety culture, operates with complex concepts. Therefore, it is important to consider the human factors in the way in which training to GH personnel is provided to ensure its

effectiveness. For example, complex concepts should be explained in simple terms and by using concrete and relevant examples from daily operation.

It is good practice that the GHSP develops a Just Culture policy (ideally, a standalone document) that is formally endorsed by top management and staff representatives.

The organisation should have:

(a) Policies to protect and support reporters, ensuring that safety data or safety information is not used for:

(1) disciplinary, civil, administrative and criminal proceedings against employees, operational personnel or organisations;

(2) disclosure to the public; or

(3) any purposes other than maintaining or improving safety.

(b) Initial and continuation training of Just Culture principles, including what is meant by 'acceptable' and 'unacceptable' behaviour.

(c) A fully accepted process to arbitrate decisions around ‘acceptable’ and ‘unacceptable’ behaviour (e.g. through a Just Culture Committee).

(d) Implement a policy by which staff who report or raise safety issues that result in positive changes for safety are rewarded (e.g. safety recognition awards).

ORGH.MGMT.240 Emergency response plan

(a) As part of its safety management system, the GHSP shall develop and implement an emergency response plan to support the aerodrome operator and the aircraft operators in case of the triggering of an emergency response. The plan shall be:

(1) aligned with the aerodrome emergency plan and, if applicable, that of the aircraft operators to which it provides services;

(2) tested periodically in association with the aerodrome operator and, when possible, the aircraft operator(s) to verify its adequacy and reviewed regularly based on feedback from previous exercises and good practice.

(b) The GHSP shall ensure its personnel receive training in emergency response, adequate to their responsibilities in providing support to the aircraft operators and aerodrome operator.

Rationale

The GHSP should have emergency response procedures and train its personnel to provide support, as needed, to the aerodrome operator and aircraft operators.

Usually, the GHSP applies the ERP of the aircraft operator and should be included in the ERP of the aerodrome operator. However, the GHSP needs to evaluate the need of specific training for its personnel, depending on the various types of support requested by the aircraft operator and the aerodrome operator and also develop own procedures to address any need of intervention that is required.

It is likely that some aircraft operators delegate the responsibility for the first response in an emergency to the GHSP at some aerodromes. This means that the GHSP will act on behalf of the aircraft operator, and therefore the training to its personnel needs to cover a wide spectrum of functions required to manage an effective emergency response, from providing support to the persons on board and to their families, to

representing the air operator in the first discussions with the aerodrome operator, the competent authorities and the investigation bodies, and to communication with the media.

Mirroring requirements are proposed to be added in Reg. (EU) 965/2012 and Reg. (EU) 139/2014 to ensure the right interfaces for emergency response.

GM1 ORGH.MGMT.240 Emergency response plan

TESTING

It is recommended that the GHSP rehearses the emergency response procedures through live or simulated operational exercises in accordance with the emergency plan schedule every time whenever this is possible.

Desktop exercises could also be organised partially, to test the reaction speed of putting up the emergency response teams, the coordination with other organisations as required, either the aerodrome operator or the aircraft operator, or both. The amplitude of such exercises may depend also on the contractual conditions between the GHSP and the aircraft operator(s).

ORGH.MGMT.245 Software equipment

For any software used by the GHSP in relation to the operational requirements to provide GH services, the GHSP shall ensure the following:

(a) if the software is used for flight processing, it is approved by the aircraft operator whose flights are processed through that software;

(b) a back-up system is available and functional in case of breakdown;

(c) the data are easily accessible and retrievable upon request by authorised persons;

(d) for all the documents issued through that software, comply with the requirements of ORGH.DOC.100 on documents and records;

(e) the personnel are trained and competent in using the software as per their assigned roles and tasks;

(f) the system is ensured to prevent any unauthorised access.

GM1 ORGH.MGMT.245 Software equipment

SOFTWARE EQUIPMENT

(1) a computerised departure control system (DCS),

(2) a safety programme for driving of automatic vehicles on the apron,

(3) a software for ground supervision services,

(4) any computerised tools for baggage and cargo sorting, processing/preparing for loading,

(5) computerised software for processing and documenting a dangerous goods transport.

(6) Any other operational software used by the GHSP to support the provision of GH services.

SUBPART DEC — DECLARATION

ORGH.DEC.100 Declaration

The GHSP, including self-handling organisations, shall:

(a) provide the competent authority with all relevant information prior to the intended date of commencing operations, using the form contained in Appendix I to this Annex;

(b) submit the following documents to the competent authority, together with the declaration, preferably in an electronic format:

(1) a list of the alternative means of compliance used for the ground handling activities;

(2) the GH service manual;

(3) the policy and procedures related to the management of changes;

(4) the training programme of its personnel intended to be involved in the provision of GH services;

(c) maintain compliance with the applicable requirements and with the information provided in the declaration;

(d) notify the competent authority without delay of any changes to its declaration or the means of compliance that it uses by submitting an amended declaration; and

(e) notify the competent authority when it ceases the ground handling activities.

Rationale

Point (b) with 'if applicable' is intended to cover the cases when a GHSP operates at an aerodrome to which the Council Directive 96/67/EC does not apply, or by an organisation that has a station manager with supervisory functions at a station, etc.

The requirement to submit a declaration applies also to the self-handling air operators. This proposal is based on the following aspects:

- *The competent authority of an aircraft operator is, in the most cases, different from the competent authority responsible for the oversight of GH services. That is because the competent authority of an aircraft operator is the authority designated by the State where that aircraft operator has a principal place of business or a place of residence and where it is registered as a legal or natural entity; that is the State of the Operator for CAT, NCC and SPO operators or the State of Registry for NCO operators. A GHSP is different in this aspect, as it is not linked to a principal place of business or place where it is registered as a commercial entity, but to the aerodrome where it provides services. Therefore, its competent authority is the authority of the aerodrome(s) where it provides services. This way, a multi-national GHSP has more than one competent authority as its services are provided on aerodromes located in more than one Member State or under the jurisdiction of more competent authorities (the case of some EU Member States). Therefore, it is important that the competent authorities of those aerodromes are informed about whether a certain aircraft operator performs also self-handling on the aerodromes where it operates.*
- *The aircraft operator will have to integrate the GH elements in its management system and will not be required to create duplicate requirements only to comply with this regulation. Only the difference will need to be reflected in its documentation and management system.*
- *The oversight process of GH activities is different. The overall concept of a declaration is that the main responsibility lies with the GHSP. On the competent authority side, the focus is not on the certification process before starting an activity (like in the case of aerodrome operators or commercial air*

operators), but on oversight, which takes place after a GHSP starts providing services. This approach shifts the centre of responsibility for compliance to the GHSP, through the declaration that it signs, rather than to the competent authority, as it is the case of certified organisations. The competent authority does not have to assess the content of a declaration when receiving it; the competent authority only needs to check that the declaration is correctly filled in and the requested documentation is submitted together with the declaration. Upon receiving a declaration, the competent authority only has to add the declared service provider in the oversight planning. By comparison, the Regulation (EU) 2020/1234 on AMS establishes for AMS a buffer zone of 2 months before starting operation. GHSP do not have this buffer zone, as the key difference for GHSP is not on the submission of papers (like in the case of AMS), but on the oversight.

- *From the administrative (data management) perspective, the structure and usage of the EU repository of information, where the GH declarations will be stored separately from the other certificates, authorisations or declarations of the other organisations. Self-handling organisations declaring their GH activities will bring clarity and transparency to the organisations providing GH services.*
- *From the financial perspective, a separation of accounts of the aerodrome operator ('the airport') when it provides GH services is required by the Council Directive (96/67/EC (Article 4): "1. Where the managing body of an airport, the airport user or the supplier of groundhandling services provide groundhandling services, they must rigorously separate the accounts of their groundhandling activities from the accounts of their other activities, in accordance with current commercial practice."*

The rule is drafted so as to avoid duplications of a regulatory or administrative regime for aircraft operators (self-handling) or aerodrome operators that also provide GH services. The rule only requires air operators and aerodrome operators to assess the differences between the management system already established for their current business and the management system supposed to be developed for a regular GHSP. Only those differences need to be addressed. This should ensure a smooth integration of the additional elements of safety management into their existing management system.

Alignment with the declaration regimes applied in other domains (apron management services, NCC and SPO operations, declared training organisations) has been sought as much as reasonably practicable and within the limits imposed by the provisions of the Basic Regulation.

GM1 ORGH.DEC.100 Declaration

GENERAL

The intent of a declaration is to:

(a) Have the GHSP acknowledge its responsibilities under the applicable safety regulations and that it holds all necessary authorisations that may be required by local or national authorities for compliance with other applicable requirements (e.g. Council Directive 96/67/EC applicable at some EU aerodromes);

(b) Inform the competent authority of the existence of a GHSP; and

(c) Enable the competent authority to fulfil its oversight responsibilities in accordance with ARGH.GEN.300 and 305.

ORGANISATIONS ALREADY HAVING A MANAGEMENT SYSTEM

(d) If the organisation providing GH services is an aircraft operator performing self-handling or an aerodrome operator, which already has a management system and complies with the requirements that are applicable to a GHSP, then the requirements of points (e) and (f) of ORGH.MGMT.200 apply.

GM2 ORGH.DEC.100 Declaration

RESPONSIBILITY REGARDING THE SUCCESSFUL SUBMISSION OF THE DECLARATION

It is the responsibility of the GHSP to successfully submit the declaration to the competent authority. If the GHSP does not receive an acknowledgement of receipt of the declaration by the competent authority under point ARGH.OVS.310 and AMC1 ARGH.OVS.310 within a reasonable period of time following the submission of the declaration, it contacts the competent authority to investigate whether the submission of the declaration has been successful.

GM1 ORGH.DEC.100(b)(2) Declaration

GROUND HANDLING SERVICE MANUAL (GHSM)

The GHS manual in the implementing rule is a generic name for the sum of documents, manuals (issued by other organisations or by itself), instructions and procedures of a GHSP, which constitute its documentation system to enable the discharge of its declared responsibilities as per the Basic Regulation (EU 2018/1139.

However, if the provider of GH services is a self-handling aircraft operator, then the GHSM can be included already in its existing operations manual, as the case may be.

In such a case, the organisation would only produce those parts of its operations manual that contain the equivalent content of a GHSM.

AMC1 ORGH.DEC.100(d) Declaration

CHANGES TO A DECLARATION

If the GHSP changes its declaration, the new declaration should be submitted before the changes indicated in the new declaration become effective.

GM1 ORGH.DEC.100(d) Declaration

CHANGES TO A DECLARATION

The changes expected to be notified to the competent authority are those related to the main entries of the declaration. These do not include detailed changes to manuals and procedures, training programmes or GSE maintenance programmes.

Details about changes that are expected to be notified to the competent authority are further explained in GM1 ORGH.GEN.130 Management of changes.

ORGH.DEC.105 Continued validity of a declaration

A declaration made by a GHSP in accordance with ORGH.DEC.100 shall remain valid if the following conditions are met:

(a) the GHSP is compliant with the requirements set out in Annex VII to Regulation (EU) 2018/1139 and in this Annex (Part-ORGH) and Annex IV (Part-GH.OPS) to this Regulation, taking into account the provisions related to the handling of findings as specified in ORGH.GEN.150;

(b) the competent authority is granted access to the GHSP in accordance with ORGH.GEN.140 to determine continued compliance with the requirements set out in Annex VII to Regulation (EU) 2018/1139 and in this Annex and Annex IV (Part-GH.OPS) to this Regulation;

(c) the declaration has not been withdrawn by the GHSP or the competent authority has not notified the GHSP to cease some or all the services covered by the declaration.

Rationale

This rule indicates the conditions that must be fulfilled so that the declaration maintains its validity. It is aligned with the recent ADR.OR.F.010.

ORGH.DEC.110 Termination of the provision of ground handling services

If a GHSP intends to terminate permanently 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 but no later than 120 days, in order to enable appropriate measures to be taken for the safe continuation of the ground handling services;

(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;

(c) notify the aerodrome operator and the competent authority if an authorisation granted in accordance with the Council Directive 96/67/EC expires and the activities will be completely terminated. If it continues to provide ground handling services that are not restricted as per the Council Directive 96/67/EC, it shall notify the aerodrome operator and the competent authority and it shall change its declaration accordingly.

Rationale

This rule was introduced having in mind the case when alternative or quick arrangements need to be made at an aerodrome when an GHSP ceases operation. This happened before, and particularly during the COVID-19 crisis, when GHSP heavily affected by the lack of air travel were forced to close down operation on certain aerodromes and the aerodrome operator had to ensure continued provision of ground handling services to the air operators using that aerodrome in a very short time.

The 120 days were added to allow the aerodrome operator, other GHSP and aircraft operators affected by this termination sufficient time to ensure continuation of the business and find other providers of the missing GH services. ***Stakeholders are invited to comment on this proposal.***

Appendix I
Declaration

DECLARATION nº 001
in accordance with Commission Regulation (EU) xxxx/xxx on the provision of ground handling services

Name of organisation providing Ground handling services:

Name, email and telephone number of the accountable manager:

……

Name, email and telephone number of the nominated person for GH safety:

……

Initial date of starting GH operation: ……

AERODROME(S) within the EASA Member States at which GHS are provided, in full name and ICAO code:

Applicability date of the change(s) – if applicable:
Note: List the changes made to the declaration and dates of application of each change
1. (oldest)
2.
3. (most recent)

☐ Where applicable, the list of alternative means of compliance with references to the associated AMCs they replace (attach AltMoC) has been submitted to the competent authority.

☐ The policy and procedures describing the management of changes has been submitted to the competent authority.

Statements

☐ The organisation complies and will continue to comply with the essential requirements set out in Annex VII to Regulation (EU) 2018/1139 of the European Parliament and of the Council and the relevant delegated and implementing acts adopted on the basis thereof.

☐ The organisation has developed and is implementing a safety policy and procedures during the provision of GH service(s) covered by this declaration, in accordance with point ORGH.MGMT.200 Management system.

☐ The management system complies with the essential requirements set out in Annex VII to Regulation (EU) 2018/1139 and laid down in Annex III (Part-ORGH) to Regulation (EU) XX and ensures management of safety risks.

☐ The GH services are carried out in accordance with the ground handling service manual established as set out in the essential requirements set out in Annex VII to Regulation (EU) 2018/1139 and as required by ORGH.DOC.110 of Annex III to Regulation (EU) XX on GH.

☐ If applicable, the organisation provides and will continue to provide the ground handling services in accordance with the procedures and instructions of the aircraft operator it serves.
☐ The organisation complies and will continue to comply with the relevant procedures contained in the aerodrome manual, including those in relation to movements of its vehicles, equipment and personnel and the risk related to aerodrome operations in winter, at night and in adverse weather conditions.
☐ All ground support equipment used are current with the maintenance programme as specified in Subpart GSE of Annex III to Regulation XX on GH.
☐ All GH personnel of the organisation are adequately trained and qualified in accordance with the requirements of Annex III (Part ORGH) to Regulation XX on GH. The implementation and maintenance of training and checking programmes shall ensure the continuing competence of all relevant personnel.
☐ The occurrence reporting obligations are complied with as set out in the essential requirements of Annex VII to Regulation (EU) 2018/1139 and Regulation (EU) 376/2014 and the delegated and implementing act adopted on the basis of these Regulations.
☐ (If applicable) The organisation has implemented and demonstrated conformity with a recognised industry standard. Reference of the industry standard: Registration body of the industry standard:
☐ The organisation will notify the competent authority of any changes in circumstances affecting its compliance with the essential requirements set out in Annex VII to Regulation (EU) 2018/1139 and with the requirements of Regulation (EU) XX on GH as declared to the competent authority through this declaration and any changes to the information and lists of AltMoC included in and annexed to this declaration, as required by point ORGH.GEN.120(a) of Annex III to Regulation (EU) XX on GH.
☐ The organisation confirms that the information disclosed in this declaration, including all Annexes, is correct.
Date, name and signature of the accountable manager

Annex to the Declaration – to be filled individually for each aerodrome where the organisation provides GH services under this declaration

Annex to Declaration nº XXX for [aerodrome name] [ICAO code of aerodrome]
Name, email and telephone number of the accountable person at the aerodrome for which this declaration is submitted: …….. If applicable, authorisation registration number as per EC Directive 96/67/EC for this aerodrome: ……..
Starting date of operation*: …….. (*(if the GHSP already provides services at that aerodrome at the date of application of this Regulation, then the date of application of this Regulation)

The organisation has implemented and demonstrated conformity with a recognised industry standard at this aerodrome.

Reference of the industry standard: ……

Registration body of the industry standard: ……..

Applicability date of the change(s) – if applicable:
Note: List of changes made to this Annex and dates of application of each change
1.
2.
3.

List of GH services provided at the aerodrome covered by this declaration.
Where a service is contracted to a third party, name of the organisation of the third-party GH service provider.

GH service provided at this aerodrome in accordance with Article 1 of Regulation (EU) XX on GH		***If applicable, name of organisation providing third-party GH services***
(a) *Only for GHSP:* Ground supervision consisting of operational supervision and representation at an aerodrome – please specify: ……	☐	
(b) Load control activities related to aircraft loading – please specify: ……	☐	
(c) Passenger handling related to gate and boarding activities – please specify: ……	☐	
(d) Passenger and baggage acceptance – please specify: ……	☐	
(e) Baggage handling – please specify ……	☐	
(f) Cargo/freight and mail handling – please specify: ……	☐	
(g) Aircraft handling on the apron – please specify: ……	☐	
(h) Aircraft services – please specify:		
Aircraft cleaning	☐	
Toilet and water services	☐	
De-icing/anti-icing	☐	
Storage of cabin equipment	☐	
(i) Handling of fuel or other energy type – please specify: ……	☐	

Ground Service Equipment (GSE) used at this aerodrome:

GSE type	
Air start unit	☐
Baggage cart, dolly	☐

Belt loader	☐
Bus	☐
Catering truck	☐
De-icing/anti-icing vehicle	☐
Elevating equipment, high loader	☐
Fuel truck	☐
Ground power unit	☐
Passenger stairs	☐
Passenger boarding bridge	☐
Potable water truck	☐
Toilet water truck	☐
Towing or pushback tractor/car	☐
Tractor, electric baggage tag	☐
ULD loader	☐
ULD transporter	☐
Vehicle used for aircraft cleaning	☐
Vehicle used for other purposes	☐

Rationale:

Related to the last table in the Annex to the Declaration form:

It is important that the competent authority is informed through the declaration of the number of third-party contracted services, in order to

- *assess the dimension and complexity of the GHSP and its management system;*
- *have a better overview of the third-party providers of GH services which are under the management system of the aircraft operator. This should also enable a better cooperation between competent authorities if they need to verify directly any possible non-compliance of the GHSP with the applicable requirements.*

SUBPART DOC — DOCUMENTS AND RECORDS

ORGH.DOC.100 Documents and records

(a) The GHSP shall establish a documents-and-records system as part of its management system. It shall cover all its activities undertaken in accordance with Regulation (EU) 2018/1139 and the delegated and implementing acts adopted on the basis thereof.

(b) The GHSP shall ensure that all documents and records are accessible to personnel requiring them for duty purposes or by authorities, whenever needed within a reasonable time. The records shall be organised in a way that ensures traceability and retrievability throughout the required retention period.

(c) The documents and records shall be stored and secured in a manner that ensures protection from damage, alteration and theft.

(d) The documents and records shall be easily legible and shall be kept on paper or in an electronic format, or a combination of both. The format of the documents and records, the storage, as well as their disposal and deletion (in the case of electronic format) shall be specified in the GHSP's manual or procedures.

(e) The GHSP shall:

(1) make available the parts of the GH service manual, including the instructions and procedures of the air operator(s) and the aerodrome operator related to the provision of ground handling service to its operational personnel.

(2) make available any other documentation required by the competent authority for inspection or audit purposes, as well as any associated amendments;

(3) ensure that the procedures for amending and distribution of the documentation are communicated to, and understood by the responsible personnel;

(4) disseminate operational instructions and changes thereof, as well as any other relevant information without delay to the personnel concerned.

Rationale:

This rule is aligned with ADR.OR.F.100, ADR.OR.D.035 and ORO.GEN.220.

AMC1 ORGH.DOC.100 Documents and records

GENERAL

(a) Documents and records in paper format should use robust material which can withstand normal handling and filing. Computer systems should have at least one backup system which should be updated within 24 hours of any new entry. Computer systems should include safeguards against unauthorised altering, deleting, stealing, or leaking the data.

(b) When hardware or software changes take place, special care should be taken that all necessary data continues to be accessible at least through the full period specified in the relevant subpart.

(c) Records stored on microfilm or optical disc format are acceptable. The records should remain legible throughout the required retention period. The retention period starts when the record has been created or last amended.

GM1 ORGH.DOC.100 Documents and records

DATA BACKUP

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

ORGH.DOC.105 Record keeping

(a) Records shall be kept for a minimum of five years or in accordance with the national requirements of the State(s) where the aerodrome where the GHSP provides its services is located, whichever is longer.

(b) Notwithstanding point (a), the following records shall be kept as follows or in accordance with the national requirements, whichever is longer:

(1) the GHSP's declaration and the alternative means of compliance in use, for the lifespan of the declaration;

(2) written arrangements with other organisations, for as long as such arrangements are in effect;

(3) GHS manual and procedures, for as long as they are used by the GHSP at that station and the air operator instructions and procedures of that particular aircraft operator;

(4) safety assessment reports for the lifetime of the system, procedure or activity;

(5) personnel training, qualifications, medical records if applicable, as well as their proficiency checks, as appropriate, for at least 4 years after the end of their employment;

(6) driving authorisations and, if appropriate, language proficiency certificates, for at least four years after the end of a person's employment, or the revocation or cancelation of a driving authorisation;

(7) vehicle authorisations and vehicle maintenance records, for at least four years after a vehicle is removed from operations;

(c) All records shall be subject to applicable data protection law.

Rationale:

This rule is aligned with ADR.OR.D.035 and ADR.OR.F.080.

Stakeholders are invited to comment on the time proposed for preserving the records indicated above.

ORGH.DOC.110 Ground handling service manual

(a) The GHSP shall establish a ground handling service (GHS) manual to include all necessary instructions, information and procedures for the service, adapted to the operational context and the operational risk, and for personnel to perform their duties, the GHSP's management system, as well as training programme of its personnel. It shall address all the tasks within the scope of GH services included in its declaration.

(b) The GHS manual may be issued in separate parts.

(c) Organisations performing GH services that already have an operations manual or an aerodrome may include the GH elements in their existing manuals.

(d) The GHSP shall ensure that any information taken from other relevant controlled documents, and any amendment thereof, is correctly and timely reflected in the GHS manual. This does not prevent the GHSP from publishing more conservative data and procedures in its manual.

(e) The GHSP shall ensure that the GHS manual:

(1) is approved and signed by the accountable manager of the GHSP;

(2) is accessible by all personnel who are required to use the manual;

(3) observes human factor principles and is organised in a manner that facilitates its preparation, use and review.

(f) The GHSP shall:

(1) review the content of the manual, ensure that it is up to date and amended whenever necessary;

(2) incorporate all amendments and revisions required by the competent authority;

(3) develop and implement a process to manage the GHS manual version control;

(4) remove or clearly mark the obsolete parts; and

(5) inform all personnel and other relevant organisations and make them aware of the changes that are relevant to their tasks.

(g) The GHSP shall ensure that all its personnel and all other relevant personnel have easy access to the portions of the manual that are relevant to their tasks and responsibilities.

(h) The GHSP shall ensure that all personnel are able to read and understand the language in which those parts of the GHS manual and other operational documents necessary to perform their tasks and responsibilities are written. The conditions of point (f) shall apply to these documents as well.

GM1 ORGH.DOC.110 Ground handling service manual

GROUND HANDLING SERVICE (GHS) MANUAL

The term ‘ground handling service manual’ is used as defined in the provisions of Regulation (EU) 2018/1139 in relation to a GHSP. Organisations may use different names for it, as the concept is not new. Depending on the type of organisation that provides ground handling services, this document may have different names, such as ‘ground operations manual’, ‘aerodrome manual’, ‘operations manual’, ‘ground service manual’, etc., without intending a different type of document. Therefore, the other terms used to define this concept should be understood as a GHS manual.

If the provider of GH services already has an operations manual or an aerodrome manual under its existing management system, then its manual only needs to be amended to incorporate the GH specific elements. The organisation can decide how to organise its manual, whether it intends to have a single manual to include all procedures and mandatory elements of all the organisations included in its management system or issue separate parts for each of them.

GM1 ORGH.DOC.110 Ground handling service manual

HUMAN FACTOR PRINCIPLES

The human factor principles in drafting the manual imply the following elements — the list is not exhaustive:

(a) it is legible, the layout is clear, the content is organised in a logical way,

(b) the text is unambiguous, meaning that it does not leave room for interpretation,

(c) it is written in a language that is understood by all personnel,

(d) it does not use words that are not familiar,

(e) abbreviations and acronyms are spelled out,

(f) charts and diagrams are clear and easy to follow,

(g) translations are correct and the translated version is always up-to-date with the original,

(h) symbols are explained.

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GENERAL

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

(b) The GHS manual should be such that:

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

(2) the manual can be easily revised;

(3) the content and revision status of the manual is controlled and clearly indicated.

(c) The GHS manual should include a description of its amendment and revision process specifying:

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

(2) the conditions for temporary revisions and/or immediate amendments, or revision required in the interest of safety; and

(3) the methods by which all personnel and organisations, including the service providers contracted by the GHSP and performing GH tasks, are advised of changes to the manual.

(d) The GHS manual content may be based on, or refer to, industry standards.

(e) The GH services manual may contain parts of, or refer to, other relevant controlled documents. If the GHSP chooses to do use material from another source in its GHS manual, either the applicable material should be copied and included directly in the relevant part of the GHS manual, or the GHS manual should contain a reference to the appropriate section of that applicable material.

(f) A translated version of the relevant parts of the manual is an accepted means to comply with the related relevant requirements. In any case, the persons who will use the manual or its translated parts should be able to read and understand them. The GHSP should ensure that the translated version is always the most recent version of that document.

AMC2 ORGH.DOC.110 Ground handling service manual

CONTENT

(a) The GHS manual should cover the following main topics:

(0) Administration and control of the GHS manual

(1) Management system of the GHSP

1.1 Organisational structure, including

1.2 Personnel

1.3 Description of the management system, including:

1.3.1 Safety management system

1.3.2 Management of changes

1.3.3 Compliance monitoring and related procedures

1.3.4 Procedures for reporting to the competent authority and other organisations, including notifying and reporting accidents, serious incidents and occurrences

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

1.3.6 Procedures for reaction to safety problems

1.4 Contracted services

(2) Qualification and training programmes of GH personnel2.1 A description of the required qualification/competencies

2.2 The training programme per GH personnel function

(3) Standard operational procedures and other guidance or instructions, per type of GH service provided, including:

3.1 procedures and instructions of the GHSP,

3.2 procedures and instructions of the aerodrome operator,

3.3 procedures and instructions of the aircraft operator(s).

(4) GSE operation, maintenance and repair instructions, servicing information, troubleshooting and inspection procedures.

(5) Dangerous goods instructions per each category of personnel involved in the handling of DG

(6) Security procedures

(b) The interfaces with the aerodrome operator and the aircraft operator should be highlighted in each section where they are developed.

(c) Where the organisation providing GH services already has an operations manual or an aerodrome manual, the content of the GHS manual should integrate the specific GH elements in its already existing manual.

GM1 ORGH.DOC.110(c) Ground handling service manual

OTHER RELEVANT CONTROLLED DOCUMENTS

Other relevant controlled documents that the GHSP may use to develop its GHS manual could be those developed by various organisations, such as ICAO, EASA, the aerodrome operator, the aircraft operator, the aircraft manufacturer, or documents such as industry standards or manuals published by industry associations and organisations.

Examples of documents that may be used:

- ICAO Annexes, Documents, Manuals
- The aerodrome operator manual of the aerodromes where the GHSP provides services
- The aircraft operator' operations manual
- De-icing manual
- Fuelling manual
- IATA documents such as:
    - Dangerous Goods Regulations
    - ULD Regulations
    - Unit Load Device (ULD) Regulations
    - Airport Handling Manual
    - Cargo Handling Manual
    - Live Animals Regulation
- etc.

SUBPART TRG — TRAINING OF GH PERSONNEL

This Subpart is not finalised. More material needs to be added in order to enable organisations to build a training and assessment programme based on required competencies for the main GH functions with significant safety implications.

ORGH.TRG.100 Training and competence programmes

(a) As part of its management system, the GHSP shall develop, implement and maintain a training and assessment programme for the personnel involved in ground handling activities, which

(1) corresponds to the size, nature and complexity of its activities, taking into account the hazards and associated risks inherent in those activities;

(2) ensures the personnel's continued competence by developing the knowledge, skills and attitudes that enable them to perform their tasks in a competent manner.

(b) The training programme shall:

(1) be appropriate to the functions and tasks of the ground handling personnel;

(2) include the applicable operational procedures and requirements, including those of the aircraft operator and the aerodrome operator, as the case may be.

(c) The GHSP shall ensure that the personnel have successfully completed the necessary training prior to being allowed to perform their duties unsupervised.

(d) The initial training shall include a theoretical and a practical phase, as appropriate to the topic, and competence assessment of the personnel. The practical training shall include on-the-job training to ensure that competency standards appropriate to their duties are consistently achieved. Individuals who did not perform tasks in the assigned function for more than 24 consecutive months shall also undergo initial training.

(e) In order to continue performing their duties unsupervised, the GHSP shall ensure that the personnel have been trained on the rules and procedures relevant to their function and tasks, and that their competence is maintained by regularly monitoring the performance of GH personnel to the required standards in order to identify any degradation of performance that may require application of recurrent or refresher training. This shall be done by applying one or more of the following training types, as the case may be:

(1) recurrent training, at intervals not exceeding 36 months from the completion of their previous training unless a different period is specified by other applicable requirements. If the recurrent training is undertaken within the last 3 calendar months of the interval, the new interval period may be counted from the date when the recurrent training was delivered.

Alternatively, the GHSP may use the method of continuing assessment of competence by assessing the individuals periodically during their day-to-day activities and applying subsequent re-training only in those areas where performance below the required standards was identified. The maximum interval for this assessment shall not exceed 36 months since the completion of the previous training;

(2) update training to cover changes to the operating environment or the individual's assigned tasks, as necessary;

(f) The GHSP shall establish and implement procedures for the implementation of the training and competence assessment programmes and shall:

(1) maintain appropriate qualification, training and competence assessments records to demonstrate compliance with this requirement;

(2) make such records available to the personnel concerned, upon request;

(3) if a person is employed by another employer, upon request, make such records of that person available to that new employer.

(g) The GHSP shall ensure that:

(1) adequately qualified and experienced instructors for the provision of training and assessors for the competence assessments are used;

(2) suitable facilities, means and equipment are used for the provision of training and, where applicable, for the conduct of the competence assessments.

Rationale

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

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

The rule combines in a balanced way the prescriptive requirements with the performance-based approach. The 'what' is included in the implementing rules (Commission Regulation), while the 'how' will be included at AMC and GM level (EASA Decision) or the industry standards. The law has the purpose to determine the responsibilities when something goes wrong or when someone claims unfair treatment. That is why the 'what' has to be stated in the law. The 'how' can then be put in AMC or GM. The GH rules have to provide legal certainty.

This implementing rule ADR.OR.D.017 and related EASA Decision EDD 2021/003/R have been partially used as a model for this implementing rule. The differences are the result of consultation with the GH expert group, based on the needs and specificity of GH activities.

In point (b)(2), the words 'as the case may be' were added to cover the cases when the aircraft operator does not have any ground handling procedures for its aircraft. This is especially the case of non-commercial operators of other-than-complex motor-powered aircraft (NCO), who are not required to have operational procedures for GH services to their aircraft. In such a case, the GH services are performed in accordance with the manuals and procedures of the GHSP.

In point (c) the term 'unsupervised' was preferred to 'unattended' to avoid the case of an untrained person being attended by another untrained person.

In point (d) the words 'as appropriate to the topic' are inserted to enable flexibility when a topic does not have a practical element (e.g., Human Factor awareness training).

In points (e) and (f) the interval of maximum 36 months for the recurrent training and assessment of competences was recommended by the experts, enabling the organisation the possibility to perform such trainings at much shorter intervals when they notice a degradation of the employees' performance and failure to perform their tasks at the required standards. The proposed interval also considers the cost effect on GHSP of having recurrent trainings at shorter intervals, while keeping an adequate level of safety of the GH activities and maintaining personnel's competence. It is also aligned with the current industry standards and best practices. This rule will have to be aligned with the equivalent one in the authority requirements, in order to

ensure that the competent authority verifies that a GHSP applies the same principle of implementing and documenting the expiry date of a training in a consistent manner.

Point (e) is intended to cover the continuing monitoring of personnel's performance in order to detect failures in executing their tasks in accordance with the applicable operational standards. As training is regarded as a mitigation measure to keep a high level of safety, it is important to apply it whenever necessary instead of waiting for any fixed intervals, the assessment of the need for recurrent training can be more easily done by having a regular monitoring of the personnel's performance.

More on recurrent training or continuing assessment of competence: this part is drafted so as to accommodate for various intervals at which recurrent training must be done for certain trainings such as dangerous goods, de-icing, or security. The validity period when training is delivered in the last 3 months before expiring has also taken into account the feedback of subject matter experts who agreed that it is simpler and more logical to count the expiry date of the recurrent training from the actual date when the recurrent training was delivered. This makes it easier also for organisations keeping track of these dates in a computerised system, when they would have to reset to the original date many times manually in the system. As an alternative, the implementing rule contains a more recent method, which is continuing assessment of competence, which entails a periodical assessment of personnel during daily operation. This is a more efficient method, as it does not require a pre-established set-up, the individual is not taken out of their regular working context, and the identification of sub-standard performance and the timely intervention to correct it can be done much more promptly. The organisation does not have to deliver the 'ready-made', generic package of recurrent training, but instead the recurrent training can be adjusted to include only those parts where the individual has performed at lower levels than required. More AMC and GM will be added to support the implementation of this alternative method of continuing assessment to maintain competences.

The time intervals for various types of training are included in the implementing rule, to ensure a level playing field. The phrase 'not exceeding… [a certain interval]' will allow the GHSP to apply also shorter intervals for different trainings, as they consider more appropriate.

Point (f) addresses part of the social aspect of training and improves the mobility of qualified personnel.

Point (g): For GHSP and aerodrome operators the Basic Regulation does not require that such training is delivered by approved training organisations. Therefore, the rules should establish requirements for trainers and assessors. The GHSP is responsible to ensure the training of its personnel and that the assessors and instructors meet the requirements. Thus, when a GH provider needs to ensure training for its personnel, it can request such training to be delivered by a training organisation, but it is the GHSP that must ensure that the instructors have the necessary qualifications to deliver the training.

The term 'instructors' is used generically, to allow the GHSP to use as instructors 'buddies', or coaches, or supervisors as well. The different terms will be explained in a guidance material.

The rule is drafted with a technology-neutral approach, to accommodate e-learning and distance learning.

More on training:

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

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

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

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

'competency framework' means a complete set of identified competencies that are developed, trained and assessed in the GHSP's CBT programme utilising scenarios that are relevant to operations and which is wide enough to prepare the GH personnel for both foreseen and unforeseen threats and errors;

'proficient' means having demonstrated the necessary skills, knowledge and attitudes that are required to perform any defined tasks to the prescribed standard;

The training requirements should be established per safety-relevant categories of GH tasks.

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

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

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

AMC1 ORGH.TRG.100 Training and competence programmes

TRAINING COURSES

(a) The GHSP should ensure that its GH personnel with operational functions undergo the required training, as required by the assigned task, in the following areas as a minimum:

(1) Domain-specific training, e.g., passenger services, cargo handling, baggage handling, aircraft loading, load control, ramp coordination, aircraft towing, de-icing/anti-icing, fuelling, passengers with disabilities, etc.

(2) Safety management system,

(3) Foreign object debris (FOD), as per the requirements established by Reg. (EU) 139/2014,

(4) Driving of GSE on the apron, as per the requirements established by Reg. (EU) 139/2014,

(5) All-weather operations and operations in winter conditions,

(6) Language proficiency training as per Annex IV to this Regulation,

(7) Ground handling activities supervision,

(8) Departure control system or any other training on IT tools and equipment used by the GHSP,

(9) Dangerous goods as per ICAO TI,

(10) Security,

(11) Specific training for supervisory staff,

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

(b) The GHSP should observe the intervals for recurrent training established through other current regulations. When an interval for the recurrent training is not specified, then the GHSP should apply the requirements for recurrence and maintaining the personnel competences specified in this Annex.

Rationale

This AMC contains the list of typical training courses that a person with operational GH functions should undergo. However, the list is not exhaustive.

Stakeholders are invited to suggest improvements to this AMC.

GM1 ORGH.TRG.100(a) Training and competence programmes

TEMPORARY AND LEASE GH PERSONNEL

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

GM2 ORGH.TRG.100 Training and competence programmes

TYPES OF TRAINING

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

(a) **Initial training** is the training delivered to a person before being assigned to any new GH duties or job roles. It focuses on developing the relevant knowledge, skills and attitudes appropriate to each GH role. It includes both a theoretical and a practical part as specified in ORGH.TRG.100(d).

Initial training is delivered also in the following cases:

(1) when a person takes over a new GH role or new GH tasks within the same organisation. In such a case, however, the content of the initial training can be adjusted to cover only the new tasks; or

(2) when a person has not performed any tasks related to their function for a period longer than 24 months prior to resuming working.

The initial training is considered completed when the person has successfully proven that he or she is competent to perform their tasks to the required standard.

(b) **On-the-job training** is the component of the training programme performed in the operational environment, which combines the theoretical and the practical knowledge and skills acquired during the previous training phases in a realistic environment. The aim of this training is to develop a person's skills so that they can perform their tasks in a competent manner.

(c) **Recurrent training** is the part of the training and assessment programme that ensures continued competence of GH personnel.

To achieve this purpose, the training starts with an assessment of a person's competence, to establish the gaps in their performance. The recurrent training can then be adjusted to the person's training needs.

Recurrent training includes training and assessment of the theoretical knowledge and skills and the practical competence of a GH employee that are necessary to perform their tasks to the required standard.

Recurrent training includes also the training on specific domains required by the applicable regulations. Examples: recurrent training on dangerous goods, de-icing, security, SMS, etc. Most of these trainings have a recurrence interval specified in the relevant regulation or by the relevant competent authority (e.g. 24 months for dangerous goods, 12 months for de-icing, 36 months or more for security, etc.). Recurrent training is required to be completed before the validity of the previous training expires.

The continuing assessment of competence is done in the operational environment. The employees are informed in advance that they are being assessed.

(d) **Refresher training** is the training to **re-qualify** a GH employee in either of the following cases:

(1) the GH employee has previously achieved competence to perform a certain role but can no longer demonstrate the required competence;

(2) the GH employee has been absent from their operational role for a prolonged period of time, between 3 and 24 months.

Refresher training is expected to address the gaps identified in the person's competence. It includes training and assessment of the theoretical knowledge and the practical competence appropriate to the person's role.

However, if continuing assessment of competences is applied, the refresher training may be incorporated in this process instead of being seen as a self-standing, isolated training step that needs to be applied only in the certain situations described above.

(e) **Update training** is the training performed when there is a change in a procedure or a regulation, to ensure that a person remains competent as a result of changes relevant to the completion of their tasks. Such training is developed and delivered following an effective analysis and change management process.

Example of update training: changes to operational procedures, new aircraft type in the fleet, operating systems, equipment, or a combination of these.

Other recommendations

(f) An individual that has been absent from the operational function for maximum 3 consecutive months should undergo a **briefing** to include any updates to the operational context. If necessary, an update training would be added if there are any changes to the current procedures or regulations.

(g) If an individual did not perform tasks associated to their function for an interval between 3 and 12 months, they should undergo either

(1) A briefing and on-the-job assessment; or

(2) A briefing and work under supervision. This should apply also if the individual is inexperienced and only had initial training.

(h) For absence between 12 and 24 months and longer, an individual should undergo briefing and refresher (requalification) training to re-establish competence.

(i) The GHSP may decide to speed up the training course if a person's responsibilities require their taking up duties sooner than the normal duration of a training would take.

AMC1 ORGH.TRG.100 Training and competence programmes

TRAINING AND ASSESSMENT PROGRAMME

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

(b) The training and assessment may be done either internally by the GHSP's qualified instructors or externally by a qualified training provider. If the delivery of training and assessment programme is delegated to an external provider, the responsibility for the standards and quality of the training programmes should remain entirely with the GHSP, in basis of its management system.

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

(1) a training needs analysis process;

(2) defined competency targets and assessment standards for the safety-critical GH functions;

(3) a training and assessment plan to develop the knowledge, skills and attitude;

(4) standards for training material and progress monitoring;

(5) a non-punitive staff competence evaluation and a training concept based on realistic elements;

(6) a description of methods and intervals for the recurrent (continuing) assessment and subsequent retraining;

(7) instructor and assessor selection requirements, to target their competencies and qualification;

(8) a description of procedures for evaluation, feedback and improvement to ensure the training meets its scope.

(d) The prerequisite competence knowledge component should be focused on knowledge and application of skills. The competence component 'attitude' should be integrated as early as possible into the training process.

GM3 ORGH.TRG.100 Training and competence programmes

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

Besides the training courses associated with specific GH functions such as dangerous goods training or security training, the GHSP should develop a competency-based training programme based on 2 or 3 main competencies selected from the general competency framework provided in ICAO Doc 9868. The selection should be based on the need to address the safety risks associated with that function. These competencies should be the minimum necessary for the basic level of a specific safety-related GH function.

Step 1: Establish the main GH functions with safety relevance within the GHSP's organisations, based on the range of GH services provided. Not all GH functions need to be included in a CBTA.

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

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

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

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

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

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

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

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

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

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

The written evidence of an assessment event will specify which elements were assessed, when they were assessed and the result of the assessment. Where the operational assessment shows a performance failure or lack of knowledge, the instructor/assessor will apply re-training to correct both the performance and any knowledge gaps. The level of action will be proportionate to the requirement.

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

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

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

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

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

Competencies	**Functions (several functions can be allocated to one role)**
Application of procedures and regulations	Identifies and applies procedures in accordance with published operating instructions and applicable regulations using the appropriate knowledge
Technical expertise	Applies and improves individual technical knowledge and skills.

Process improvement	Contributes to the continuous improvement of the system
Communication	Communicates effectively in all situations
Situational awareness	Perceives and comprehends all relevant info available and anticipates what could happen that may affect the operation
Workload management	Manages available resources efficiently to prioritize and perform tasks in a timely manner under all circumstances.
Problem-solving and decision making	Accurately identifies risks and resolves problems. Uses appropriate decision-making techniques.
Leadership and teamwork	Collaborates up, down and across the organization to foster and promote a clear vision and common goals. Energizes others to achieve the operational goals.
Coordination and handover	Manages coordination and handover between personnel
Teamwork	Operates safely and efficiently as a team member
Self-management and continuous learning	Demonstrates personal attributes that improve performance and maintain an active involvement in self-learning and self-development

Suggested safety critical GH functions for which a CBTA should be implemented:

(1) Supervising GH activities (incl. aircraft handling and/or passenger handling)

(2) Load control: load planning, mass&balance calculations, loadsheet production

(3) Passenger services: pax & bag acceptance, boarding / gate services

(4) Aircraft loading/ unloading

(5) GSE operator (passenger boarding bridge, potable water services, toilet services, catering trucks)

(6) Aircraft movement (towing, pushback)

(7) Sort& prepare baggage, cargo, mail

(8) Ramp turnaround

(9) Fuelling operations

(10) Cargo operations

(11) De-icing/anti-icing operations

(12) Personnel supervision in various areas (Ramp activities; passenger handling activities).

More material will be developed to provide an example with a checklist that can be used to perform a competency-based assessment of an individual on a specific safety-critical GH function. Such a checklist is intended to be used by the trainer/assessor who is performing the assessment of an individual during their daily operation. It is expected to include regular tasks (from the job description of that function) with a number of observable behaviours for each task, which should enable an easy evaluation of the individual's performance in a standardised format. That checklist could then be used as proof of continuing assessment of competences for audit purposes.

GM4 ORGH.TRG.100 Training and competence programmes

FURTHER GUIDANCE FOR AN EFFECTIVE TRAINING AND ASSESSMENT PROGRAMME

(a) The trainer or assessor should integrate multiple tasks in one exercise or assessment scenario.

(b) The training or evaluation of skills and attitudes during group instructions or assessments could be based on tasks allowing interaction during communication, workload management, problem solving and decision making, leadership and teamwork.

(c) In order to avoid a subjective assessment, the assessment phase should include also in pairs or groups, to allow trainees to assess themselves by comparing themselves to the others.

(d) Competence assessment: The GHS manual should define what is required to perform a specific task. That information should include feedback from employees.

More material will be developed to support the development and implementation of a CBTA programme for the main safety-critical GH functions.

GM5 ORGH.TRG.100 Training and competence programmes

ON-THE-JOB TRAINING WITH MENTORS

For the purpose of on-the-job training, the GHSP may use senior employees to act as mentors for the trainees.

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

(a) Core tasks:

(1) Provide technical expertise:

(i) help with developing and maintaining competencies,

(ii) teaching knowledge and skills,

(iii) supporting the learning process,

(iv) promoting the safety culture,

(v) providing feedback,

(vi) point of contact.

(2) Promote social integration:

(i) share information on the purpose of the organization,

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

(iii) promote equality by building a safe and honest relationship,

(iv) guiding the trainee in the organisation's network.

(b) Responsibilities:

(1) Guide and motivate (new) employees optimally, in line with the agreed commitment,

(2) Maintain his or her own skills and expertise,

(3) Develop means for the execution of the mentor function (by developing or using a checklist, information folder, etc.) in coordination with the health and safety manager and the supervisor.

(c) Competencies:

(4) Knowledge

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

(ii) knowledge about the structure of the organisation.

(2) Skills:

(i) social skills,

(ii) be able to listen actively,

(iii) be able to motivate,

(iv) be accessible,

(v) communicate efficiently,

(vi) recognise non-verbal signals,

(vii) be able to influence the learner,

(viii) be able to provide feedback,

(ix) be able to evaluate,

(x) show respect,

(xi) stimulate autonomy.

(3) Attitudes:

(i) willing to invest time

(ii) mature and experienced

(iii) patient

(iv) prepared to give trust

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

(vi) self-confident

(vii) trustworthy

(viii) impartial

(ix) act deontologically

(x) tolerant

(xi) motivated.

(d) Types of mentors – examples:

(1) 'buddy' means a mentor that assists and guides employees having a seniority of less than 3 months;

(2) 'coach' means a mentor that assists and guides any employee, depending on the organisation's needs (e.g. team coach, performance coach, on-the-job coach). An employee can become coach after having undergone a specific advanced training course and evaluation.

AMC2 ORGH.TRG.100 Training and competence programmes

CONTINUING ASSESSMENT AND SUBSEQUENT RETRAINING

(a) To ensure their continued competence in performing the tasks as per the required standards, the GHSP should develop and implement a method to perform continuing non-punitive assessments and a following retraining of the GH personnel.

(b) The non-punitive assessment should be performed during real-time activities (on-the-job performance) and should be based on realistic and evident tasks specific to the role.

(c) The individual(s) under assessment should be informed in advance of the date and the expected assessment conditions.

(d) The continuing assessment should check knowledge, skills and attitudes simultaneously and should provide the anonymous and confidential results and a recommendation of corrective measures. The minimum pass rate for an examination should be 80%.

(e) The results and recommendations from the evaluation should support the gap analysis to identify competency gaps of a group and adjust tasks and the respective training for the role-related target group, rather than individual competency gaps.

(f) The resulting re-training based on the gap analysis should be later on applied to the intended target group.

(g) The GHSP should establish a procedure to ensure that the instructor/assessor reviews the incorrect answers together with the trainee in order that their knowledge is 100% 'error free' and correct on leaving the learning environment.

(h) The interval for the continuing assessment and retraining should be driven by evident scenarios, safety events, accident/incident reports, or changes within the regulation or aircraft operators' manuals, and results from regular non-punitive competence evaluations. The evaluation and re-training interval should not exceed 36 months.

(i) If the continuing assessment indicates areas where the level of performance is below the required standard, the GHSP should adjust the retraining session to the needs identified after the recurrent assessment, to address the gaps in performance.

(j) The continuing assessment and retraining should be documented for recording and inspection purposes.

ASSESSORS OF CONTINUED COMPETENCE

(k) The GHSP may appoint as assessors individuals that have similar tasks and responsibilities in its organisation.

(l) Additionally, these assessors should receive further training in the human performance and limitations, as well as minimum elements of instructor and assessor training in order to be able to perform the instructions and assessment of their peers.

GM6 ORGH.TRG.100 Training and competence programmes

ERROR-FREE LEARNING

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

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

GM7 ORGH.TRG.100 Training and competence programmes

MEANS TO IMPLEMENT A CONTINUING ASSESSMENT PROGRAMME

[placeholder]

AMC1 ORGH.TRG.100(g) Training and competence programmes

GH INSTRUCTORS/TRAINERS – QUALIFICATION AND COMPETENCE

[Placeholder]

SUBPART GSE — GROUND SUPPORT EQUIPMENT (ORGH.GSE)

ORGH.GSE.100 Ground support equipment (GSE) — general

(a) As part of its management system, the GHSP shall appoint a person responsible for the monitoring of the GSE operation and maintenance. Such a person shall be properly trained and competent. This function may be cumulated with another function within the GHSP organisation.

(b) As part of its management system, the GHSP shall have a process to ensure that the GSE used for the provision of ground handling services

(1) is serviceable, in good condition,

(2) operated according to the operating instructions and within the design parameters of the equipment,

(3) used only for the purpose(s) for which the equipment is designed,

(4) maintained in accordance with the GHSP's maintenance programme and instructions, with due consideration to a minimum impact on the environment.

(c) For this purpose, that GHSP shall:

(1) have manuals for the operation of GH equipment, which are available and applied in practice;

(2) establish and implement adequate procedures and instructions for the operation of the GSE;

(3) 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;

(4) ensure that the personnel using GSE have a valid driver's licence if required, have been authorised by the aerodrome operator, and are properly trained and their competencies are maintained;

(5) when using autonomous vehicles, ensure that these have been authorised by the aerodrome operator and any additional local specific requirements are observed;

(6) establish and implement a maintenance programme, which includes preventive maintenance where appropriate, to maintain the systems and equipment necessary for the provision of GH services in a state of operation that does not impair the safety, regularity of efficiency of operations;

(7) ensure that non-serviceable GSE is properly marked/labelled and not used for current operation;

(8) when GSE maintenance services are outsourced, ensure that the maintenance is performed in accordance with the equipment manufacturer instructions and specifications, which cover maintenance and repair instructions, servicing information, troubleshooting, and inspection procedures.

Rationale: point (d) is aligned with ADR.OPS.C.005.

It covers also the requirement to have a maintenance programme for the GSE.

It includes also a provision for autonomous vehicles (point (c)(5)), to ensure that this rule is intended to apply also to future technologies adopted for GSE. Stakeholders are invited to provide suggestions on any mandatory aspects that should be covered by the rule with regard to autonomous vehicles.

ORGH.GSE.105 GSE maintenance programme

(a) The GHSP shall:

(1) ensure the implementation of a maintenance programme for its vehicles and equipment that operate on the movement area and other operational areas at the aerodrome.

(2) establish procedures to support the implementation of the maintenance programme referred to in point (a);

(3) ensure that the maintenance programme is effectively implemented using appropriate and adequate means and facilities, including when maintenance services are outsourced;

(4) ensure that unserviceable vehicles are not used for operations;

(5) keep maintenance records for each vehicle.

(b) The maintenance programme shall be adequate to the frequency and the specific conditions of its use.

(c) The design and implementation of the maintenance programme shall observe the human factor principles.

(d) The maintenance programme shall ensure effectiveness of the vehicles and their equipment and compliance with the specified response time throughout the life of the vehicle.

Rationale: alignment with ADR.OPS.C.005 and 007. It is not expected that an aerodrome operator establishes a double system to cover the equipment maintenance requirements two times when it also provides GH services. If there are any differences, these should be covered, however, if the maintenance programme is already in place and functional, then compliance with this requirement should not require additional tasks.

AMC1 ORGH.GSE.105 GSE maintenance programme

MAINTENANCE PROGRAMME

The GHSP should use the maintenance programme and instructions provided for by the equipment manufacturer.

The maintenance programme of the GSE should be reflected in the safety risk assessment process of the GHSP.