

## **EASA Ground Handling Organisations - Declaration-based compliance — (No Prior Approval Necessary)**

Sofema Aviation Services (SAS) considers the process by which (typically) existing EASA Ground Handling Organisations may achieve Declaration-based compliance with no prior approval.

**Introduction – (According to EASA)** - By relying on a declaration-based regime supported by robust, risk-based oversight, EASA aims to streamline compliance while ensuring high standards across ground-handling services—boosting safety, efficiency, and regulatory cooperation

Ground Handling Organisations (GHOs) are required to submit a formal declaration to their national Competent Authority (i.e., the CA responsible for the aerodrome where they operate) confirming compliance with the new Part-ORGH requirements (covering management system, safety, training, equipment, SMS, etc.)

- This declaration is declarative in form, means it is not an application for approval—offsetting administrative burden while retaining safety oversight

### **Timing & transitional phase**

- The regulations enter into force shortly, but organisations have a transitional window (Mar 2027 to Mar 2028) during which they should submit declarations
- Full compliance becomes mandatory by March 2028, with some provisions stretching until 2031 (e.g., information security)

### **What the declaration must include**

Under ORGH.DEC.100, the declaration must detail:

1. The range of services offered at each aerodrome
2. The organisation's management and safety systems (SMS), training and maintenance arrangements, doc controls, etc.
3. Any Alternative Means of Compliance (AltMoC) they intend to use

### **Competent Authority's responsibilities**

#### **a. Receipt & review**

- The CA acknowledges the declaration, provides a reference number, and checks for completeness & correctness
- If gaps or inconsistencies are found, the CA requests clarification or may conduct inspections prior to acceptance .

#### **b. Oversight & inspections**

- Once accepted, GHOs fall under a risk-based oversight program (audits, inspections, including unannounced) on cycles of up to 4–6 years .

The required periodicity for oversight of Ground Handling Organisations (GHOs) by European Competent Authorities is defined in the EASA regulations, specifically in **ARGH.OVS.305(b)-(e)**:

- **Default oversight cycle:** must **not exceed 48 months** (i.e., every four years) from the date of the initial declaration receipt
- **Extension to 72 months** (six years) is permitted **only if** specific robust criteria are met:
  1. The GHO has demonstrated an effective management system, including proper compliance monitoring, hazard identification, and risk control.
  2. It has control over organizational changes per ORGH.GEN.130.
  3. There were **no Level 1 findings** during the previous cycle.
  4. All corrective actions were implemented within agreed timelines.
  5. The annual activity report shows satisfactory safety performance
- Conversely, the cycle **can be shortened** if the GHO's safety performance deteriorates

- The CA evaluates AltMoCs, inspects, tracks compliance, and escalates findings (Level 1 or 2) where necessary.

#### **c. Documentation & record-keeping**

- CAs must maintain a transparent **register** of all received declarations, supporting documents, oversight records, corrective actions, and enforcement actions for at least five years

#### **d. Coordination with other CAs & EASA**

- If a GHO operates in multiple Member States, the CA **shares the declaration** with other relevant national authorities
- For aviation safety issues or AltMoC approvals, the CA informs EASA **without delay**
- CAs participate in mutual assistance and coordination with peers to ensure consistent oversight across borders .

#### **e. Enforcement & corrective action**

- When non-compliance is detected, CAs categorize findings:
  - **Level 1** for serious safety breaches (e.g. obstructing access, malpractice)
  - **Level 2** for other non-compliances .
- They enforce corrective measures, require root-cause analyses and follow-up, and can escalate or withdraw declarations where necessary .

#### **Flow of the declaration process**

1. **GHO prepares:** gap analysis, updates SMS/training/docs, identifies any AltMoC.
2. **Submission (27 Mar 2027–27 Mar 2028):** GHO sends declaration to CA.
3. **Acknowledgement:** CA issues reference number and confirms receipt.
4. **Review & inspection:** CA checks content and may audit.
5. **Acceptance:** Declaration accepted, GHO recorded in register.
6. **Ongoing oversight:** Risk-based audits and inspections.
7. **Enforcement:** Findings addressed; measures taken, declaration may be amended or withdrawn.
8. **Coordination & reporting:** CA liaises with EASA and other Member States on safety, AltMoC, or significant issues.

## Summary: CA's central role

- **Gatekeeper:** receives and validates declarations.
- **Validator:** evaluates SMS, AltMoC, operational readiness.
- **Oversight authority:** designs and implements inspection programs.
- **Enforcer:** raises findings, mandates corrective actions, and can withdraw privileges.
- **Coordinator & notifier:** shares info across borders and with EASA; ensures harmonised application.

## Next Steps

Sofema Aviation Services [www.sassofia.com](http://www.sassofia.com) and Sofema Online [www.sofemaonline.com](http://www.sofemaonline.com) provides Classroom, Webinar & Online Training, EASA Compliant Regulatory & Vocational Training – Please see the web sites or email [team@sassofia.com](mailto:team@sassofia.com)