

European Ground Handling Service Providers are Transitioning to an EASA Approval

Sofema Aviation (SA) Takes a Deep Dive into the forthcoming Regulatory Changes

Introduction

Operating a ground handling service provider (GHSP) is a significant management and operational undertaking, especially if you have personnel spread across multiple stations.

The publication of the EU Ground Handling regulations, specifically

- Regulation (EU) 2025/20 (for ground handling organizations) and
- Regulation (EU) 2025/23 (for national competent authorities)

Marks the first time ground handling has been directly regulated under the EASA framework.

- The standard practice of airlines carrying the sole regulatory and auditing burden under their Air Operator Certificates (AOCs) is shifting.
- As a GHSP, you must now directly declare compliance, establish a formal Management System, and face direct oversight from your National Competent Authorities (NCAs).

Consider the following multi-station implementation strategy and transition timeline designed to bring your operations into full alignment before the regulatory deadlines.

Key Pillars of the EASA Ground Handling Framework

To achieve compliance across multiple locations, your implementation journey must address five core technical areas mandated by Regulation (EU) 2025/20:

- **Management System (including SMS):** A scalable system covering hazard identification, safety risk management, safety performance monitoring, and an emergency response plan (ERP).
- **Compliance Monitoring:** A dedicated, independent loop to monitor operational quality, standardization, and adherence to procedures across all 6 of your locations.
- **Personnel Training & Competence:** Documented, standardized training programs, structured initial and recurrent syllabi, and robust continued competence checks.
- **Ground Support Equipment (GSE) Maintenance:** Standardized preventive maintenance programs, pre-use inspection protocols, and full lifecycle service records for all GSE.
- **Operational Procedures (The GHM):** A comprehensive Ground Handling Manual (GHM) that clearly defines organizational accountability, reporting cultures, and standardized turnaround, loading, fueling, and de-icing procedures.

Multi-Station Implementation Journey Path

Managing a workforce of 1,500 across 6 separate airports means that a "one-size-fits-all" or top-down rollout will likely fail due to localized station dynamics, varying GSE fleets, and different local airport authority requirements.

Corporate Standardization & The "Lead Station" Pilot

- **Centralized PMO:** Form a regulatory transition Project Management Office (PMO) led by a senior corporate manager to draft the core Ground Handling Manual (GHM).
- **The "Lead Station" Strategy:** Do not attempt a simultaneous rollout across all 6 stations. Select one "Lead Station" (typically your largest or most resource-mature hub) to pilot the draft management systems, hazard reporting workflows, and GSE maintenance trackers.
- **Baseline Gap Analysis:** Conduct a comprehensive gap analysis at each of the remaining 5 stations to map local variations, existing training logs, and subcontractor relationships against the corporate GHM.

Standardizing Training & System Integration

- **Digital Training Portals:** Leverage SCORM-compliant training systems to standardize regulatory ground handling modules (safety culture, human factors, cargo loading, ramp safety). This ensures all 1,500 employees receive identical, trackable training regardless of their station.
- **Safety Culture Integration:** Focus heavily on non-punitive "Just Culture" reporting. Because ground damage remains one of the highest cost drivers and safety risks in our industry, frontline trust in the reporting system is vital for your SMS to capture active hazard data.

Regulatory Alignment Timeline (Through 2028)

The regulatory clock is active. The transition window dictates when you must submit your official compliance declarations to your respective National Competent Authorities.

Core GHM Development & Lead Station Pilot

Q3 - Q4 2026

Draft the corporate Ground Handling Manual (GHM) incorporating EASA Easy Access Rules for Ground Handling. Establish the SMS reporting loop at your designated Lead Station. Roll out initial digital training modules to baseline the workforce.

Multi-Station SMS Rollout & GSE Standardization

Q1 2027

Export the validated Lead Station SMS structure to the other stations. Standardize the GSE preventive maintenance program across all locations, ensuring all ground support equipment is integrated into a unified inspection and defect-reporting database.

Start of NCA Declaration Window

27 March 2027

The EASA window opens for Ground Handling Service Providers to begin submitting their formal declarations of compliance to their respective National Competent Authorities (NCAs). Your corporate PMO should have the first station folders ready for submission.

Internal Auditing & Regulatory Dry Runs

Q2 - Q4 2027

Run independent internal compliance audits across all 6 stations. Test your cooperative oversight capabilities to ensure corporate-level safety managers can monitor local station compliance and close out findings.

Full Regulatory Applicability 27 March 2028

EASA Regulation (EU) 2025/20 becomes fully applicable. All 6 of your stations must operate under approved declarations, active Safety Management Systems, and standardized competence assurance frameworks subject to direct NCA oversight.

Information Security Management (Part-IS) Alignment By 27 March 2031

Achieve full compliance with Information Security Management System requirements (**Part-IS.D.OR** via Regulation (EU) 2025/22), securing your digital operations, load planning, and customer data streams.

Immediate Next Steps for Leadership

To avoid a last-minute scramble as the declaration window approaches in 2027, your leadership team should focus on three immediate actions:

1. **Define Accountabilities:** Formally appoint your Accountable Manager and key post-holders (Safety Manager, Training Manager, Compliance Manager) who will own the transition.
2. **Evaluate Industry Standards:** Determine how your GHM will align with existing voluntary industry standards (e.g., IATA's IGOM or ISAGO). Under ED Decision

2025/008/R, EASA permits using accepted industry standards as a means of compliance, which can significantly streamline your certification path.

3. **Engage the NCAs:** Reach out to the Civil Aviation Authorities overseeing your 6 locations to coordinate your planned declaration schedule and discuss their specific cooperative oversight protocols.

Transitioning a multi-station operation of **1,500 personnel across 6 distinct locations** to meet the new EASA Ground Handling regulations (**Regulation (EU) 2025/20** and **Regulation (EU) 2025/23**) requires a highly organized, modular approach.

Because EASA permits Ground Handling Service Providers (GHSPs) to use industry standards as Acceptable Means of Compliance (AMC), the structure of your new **Ground Handling Manual (GHM)** can be closely aligned with the IATA Airport Handling Manual (AHM) and Ground Operations Manual (IGOM). This minimizes disruption to your existing airline SLA agreements while ensuring strict legal compliance.

Here is a comprehensive blueprint for structuring your GHM, followed by a roadmap to build an operationally realistic Safety Management System (SMS) across your entire network.

1. Structure of the EASA-Compliant Ground Handling Manual (GHM)

Under **Part-ORGH.MLR.100**, your GHM is the single source of truth for your entire operation. It can be compiled as a master document with station-specific appendices. The optimal structure is organized into five core sections:

Part 0: Administration and Control

- **0.1 System of Amendment and Revision:** Process for updating, approving, and distributing revisions to all 6 stations and contracted service providers.
- **0.2 Record of Revisions and Temporary Revisions:** Process to ensure that the active version at every ramp is never out of sync.
- **0.3 Distribution List:** Controlled copy-holders (including the National Competent Authorities (NCAs) and client airlines).

Part 1: Organization and Management System (SMS)

- **1.1 Corporate Safety Policy & Objectives:** Signed commitment by your **Accountable Manager** declaring that safety priorities strictly override operational or commercial pressures.

- **1.2 Key Management Personnel:** Clearly defined roles and responsibilities for the Accountable Manager, Safety Manager, Training Manager, and Compliance/Quality Manager.
- **1.3 Safety Management System (SMS) Framework:**
 - **Hazard Identification & Risk Assessment:** Structured proactive/predictive risk register processes.
 - **Just Culture Reporting Policy:** Non-punitive reporting system designed to encourage frontline reporting.
 - **Management of Change (MoC) Procedures:** Protocol for assessing safety impacts prior to station expansions, fleet swaps, or roster changes.
- **1.4 Compliance Monitoring Program:** Auditing schedules, independent quality loop protocols, and corrective action tracking across all 6 stations.
- **1.5 Emergency Response Plan (ERP):** Local crisis management, coordination with airport operators, and customer airline notification loops.

Part 2: Personnel and Training Requirements

- **2.1 Training Program Structure:** Initial, recurrent, and specialized training syllabi.
- **2.2 Competence Assessment Framework:** Processes for practical line-checks and the physical sign-off of safety-critical roles (e.g., Loading Supervisors, Pushback Drivers).
- **2.3 Human Factors & Fatigue Risk Management:** Specialized training modules and duty-time limitations to mitigate fatigue-induced errors on the ramp.
- **2.4 Record-Keeping System:** How employee qualification data, training dates, and competency records are securely archived and easily retrieved for audits.

Part 3: Operational Procedures (The "On-Ramp" Execution)

- **3.1 Passenger and Baggage Handling:** Boarding safety, transfer protocols, and baggage reconciliation.
- **3.2 Ramp Safety and GSE Operations:** Equipment Restraint Area (ERA) entry/exit rules, speed limits, and hand signals.
- **3.3 Aircraft Servicing:**
 - Toilet and potable water servicing.
 - Into-plane fueling/defueling safety protocols.
 - Aircraft exterior cleaning.

- De-icing and anti-icing protocols.
- **3.4 Turnaround Activities:** Aircraft securing (chocks and cones), arrival and departure walkarounds, loading/unloading supervision, and towing/pushback procedures.
- **3.5 Cargo and Mail Handling:** Safe warehouse storage, final build-up, and weighing/tagging of Unit Load Devices (ULDs).
- **3.6 Adverse Weather Operations:** Procedures for high winds, lightning, snow, or extreme heat.

Part 4: Ground Support Equipment (GSE) Maintenance

- **4.1 Fleet Inventory:** Controlled list of all motorized and non-motorized GSE active across the 6 stations.
- **4.2 Preventive Maintenance Program:** Manufacturer-aligned maintenance schedules, daily pre-use inspection protocols, and defect reporting procedures.
- **4.3 Maintenance Records:** Secure archiving of servicing, repairs, and statutory safety inspections.

2. Implementing the SMS: A Practical 4-Step Approach

To deploy this SMS effectively to **1,500 employees**, treat the system not as a paperwork exercise, but as an active operational safeguard.

[STEP 1: DEFINE & RESOURCE]

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[STEP 2: BUILD THE FEEDBACK]

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[STEP 3: MANAGE GSE SAFETY]

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[STEP 4: MONITOR & CONTINUALLY IMPROVE]

Step 1: Define Roles & Establish the Core System

- **Appoint Post-holders:** Officially assign the corporate **Safety Manager** and designate local **Station Safety Coordinators** at each of your 6 airports. This ensures corporate oversight is maintained while local operational variations are managed effectively.
- **Map Interfaces:** Establish a shared interface with the local airport operators (aerodrome SMS) and customer airlines. Since ramp safety occurs at these boundaries, coordinate hazard tracking across all organizations.

Step 2: Establish the Reporting and Feedback Loop

- **Implement Low-Barrier Reporting:** Introduce simple reporting methods (such as a mobile app or dedicated QR-code portals) so ramp workers can easily log near-misses, FOD, or equipment defects within 2 minutes of occurrence.
- **Protect the Data:** Establish a formal "Just Culture" policy. Ensure employees understand that reporting unintentional human errors or systemic failures will not lead to punitive action, thereby protecting the integrity of your reporting data.
- **Provide Direct Feedback:** Ensure the safety team shares lessons learned, trend charts, and corrective actions back to the stations during daily crew huddles.

Step 3: Tackle the Root Cause of Ramp Damage (GSE Control)

- **GSE-Specific Risks:** Because GSE contact accounts for a significant portion of ramp accidents, implement standard procedures for operating around aircraft.
- **Strict Authorizations:** Ensure no employee operates GSE unless their digital training record indicates active, validated competence for that specific asset type.
- **Pre-Use Checks:** Mandate digital "walkaround" checklists before starting any GSE. Red-tag and quarantine defective equipment immediately to prevent incident escalation.

Step 4: Compliance Monitoring & Continuous Improvement

- **Internal Quality Audits:** Your compliance team must audit each of the 6 locations at least once every 12 months, checking ramp compliance against the GHM and verifying that correct training records are on-site.
- **Establish SPIs (Safety Performance Indicators):** Track monthly metrics such as:
 - Number of safety reports submitted per 1,000 turnarounds.
 - Average time to close out red-tagged GSE issues.
 - Ramp damage cost per 10,000 movements.

- **Management Reviews:** Run quarterly executive reviews using this safety data to guide training budgets, GSE procurement, and staffing levels.

3. Recommended Next Steps for Your Team

To transition your organization smoothly toward the March 2028 full enforcement deadline, consider starting with these foundational steps:

1. **Draft the Corporate Safety Policy:** Have your Accountable Manager sign the safety commitment to set a clear top-down standard for the organization.
2. **Conduct a Multi-Station Gap Analysis:** Assess your current training records, GSE maintenance logs, and local station procedures against the GHM structure outlined above.
3. **Choose a Lead Station:** Select one airport to pilot the SMS reporting loop and GHM operational procedures before rolling them out across all 6 stations.