

Compliance, Audits, and Documentation

Sofema Aviation (SA) Considers Roles Responsibilities and Regulatory Obligations related to EASA Ground Handling Regulations

Introduction - Commission Delegated Regulation (EU) 2025/20 (Part-ORGH - Organisation Requirements - Ground Handling)

- **ORGH.MGM.200 General requirements for the management system:** Requires the ground handling organization to establish a management system that includes a compliance monitoring function (internal audits) to evaluate compliance with applicable requirements.
- **ORGH.GEN.140 Access & ORGH.GEN.145 Provision of documentation:** Obligates the organization to grant the competent authority access to its facilities, procedures, and records, and to provide requested documentation (such as the Ground Handling Manual) prior to audits.
- **ORGH.DOC.110 Ground handling manual:** Requires the organization to establish and operate in accordance with a ground handling manual.
- **ORGH.GEN.120 Means of compliance:** Governs the use and documentation of Alternative Means of Compliance (AltMoC), requiring safety risk assessments to be provided to the competent authority.

Competent Authority Verification

Commission Implementing Regulation (EU) 2025/23 (Part-ARGH - Authority Requirements - Ground Handling)

- **ARGH.OVS.300 Oversight:** Mandates that the competent authority verify the ground handling organization's continued compliance with Delegated Regulation (EU) 2025/20 and its declaration. It specifies that oversight must be based on audits and inspections, including unannounced and ramp inspections.
- **ARGH.OVS.305 Oversight programme:** Requires the competent authority to establish a risk-based oversight programme and planning cycle (typically up to 48 months, but adjustable based on safety performance and risk exposure). The programme dictates the frequency and scope of scheduled and unannounced audits.
- **ARGH.MGM.215 Record-keeping:** Details the competent authority's obligations to maintain records related to the oversight of ground handling organizations, including audit findings, corrective actions, and enforcement measures.

Authority Responsibilities

The competent authority's verification of continued compliance employs a risk-based oversight programme that dictates the frequency, scope, and depth of both scheduled and unannounced audits.

This oversight framework goes beyond merely checking the initial declaration to actively evaluating the organization's ongoing safety performance and operational maturity.

Risk-Based Oversight Cycle: Competent authorities apply a standard oversight planning cycle that does not exceed 48 months.

- This cycle can be extended up to 72 months for organizations that consistently demonstrate an effective management system, successfully control operational changes, have no Level 1 findings, and implement corrective actions on time.
- Conversely, the cycle can be reduced if safety performance decreases or if local aerodrome hazards require enhanced surveillance.

Comprehensive Inspection Scope: Oversight relies on a combination of document reviews and on-site observations.

- Inspectors should assess
 - the management system,
 - safety risk mitigation,
 - reporting records,
 - training programmes,
 - ground support equipment (GSE) maintenance, and
 - the actual execution of ground handling activities during aircraft turnaround.

Unannounced and Ramp Inspections: To ensure authentic compliance during daily operations, authorities are empowered to conduct unannounced inspections and ramp inspections without prior notification to the ground handling organization.

Integration of Safety Data: The scope and focus of the oversight programme are continuously adjusted based on collected safety data, past oversight results, the organization's risk exposure, and safety priorities identified in the European Plan for Aviation Safety.

Third-Party Industry Audits: To support their risk-based oversight, competent authorities may consider the results of third-party industry audits (e.g., audits conducted on behalf of an aircraft operator), provided these audits align with the regulatory scope, are objective, and the results are fully accessible to the authority.

Findings and Corrective Actions: When non-compliance is identified, the authority issues findings categorized by severity

- (Level 1 for significant safety risks, Level 2 for lesser risks).
- The organization must then identify the root cause and (Contributing Factors) implement an acceptable corrective action plan;

Note - Failure to do so can lead to the limitation or prohibition of specific ground handling activities.

How do you currently prepare your personnel and operational sites for the possibility of unannounced ramp inspections?

- The competent authority verifies continued compliance with Delegated Regulation (EU) 2025/20 and the organization's declaration through audits and inspections.
- Oversight relies on examining records, data, and procedures, and authorities are empowered to conduct unannounced inspections to ensure safety measures are properly implemented.
- Best Practice: Ground handling organizations should conduct regular reviews of applicable requirements and integrate any regulatory changes into their documentation and annual activity reports.
- Challenge: Fostering a genuine "just culture" is difficult but necessary; without it, personnel may fear repercussions, leading to unreported safety occurrences and ineffective root cause analyses.

Internal Compliance Monitoring and Audit Scheduling

- The internal compliance monitoring process must ensure that the organization adheres to regulatory requirements, its own manuals, and the procedures established by the aerodrome and aircraft operators.
- This monitoring function must include a direct feedback system that reports audit findings to the accountable manager, ensuring that corrective actions are effectively implemented.
- Audit schedules must be defined with a periodic review cycle for each area, not exceeding 36 months or the duration of the competent authority's oversight planning cycle, which is typically 48 months.
- Challenge: Establishing functional independence for the compliance monitoring system can be challenging in small organizations, as audits must not be carried out by the personnel responsible for the audited process.

GHM, Record-Keeping, and AltMoC

- The organization must establish a Ground Handling Manual (GHM) that defines its operational procedures, and it must operate in strict accordance with this manual.
- Record-keeping systems must guarantee the adequate storage, reliable traceability, and accessibility of documents for a minimum of 5 years. Digital records require at least one backup system updated within 24 hours and stored in a separate location.
- Organizations may implement Alternative Means of Compliance (AltMoC), provided they complete a safety risk assessment demonstrating an equivalent level of safety to the accepted AMC.
- Challenge: When applying an AltMoC, ground handling organizations must successfully coordinate with affected aircraft and aerodrome operators to ensure the alternative procedures do not cause unintended safety consequences at operational interfaces.

Internal Compliance Monitoring and Audit Scheduling

The internal compliance monitoring function is a core component of the ground handling organization's management system, designed to proactively ensure adherence to safety standards and operational procedures.

Scope of Monitoring: The organization must monitor compliance with

- Its own declaration,
- The Safety Management System (SMS),
- Training programmes,
- the Ground Handling Manual (GHM),
- Applicable aerodrome manual procedures,
- Ground Support Equipment (GSE) maintenance programme.
- It must also verify the compliance of any outsourced activities.

Organizational Set-Up and Independence: The Accountable Manager is responsible for ensuring sufficient resources are allocated to the compliance monitoring function.

- The independence of this function must be established;
- Audits and inspections cannot be performed by personnel responsible for the specific function or procedure being audited.
- In small organizations, where this functional independence is challenging to establish, audits may be performed by appointed auditors from outside the organization, provided they operate under the responsibility of the internal compliance monitoring person.

Audit Scheduling and Cycles: The compliance monitoring programme must include a defined audit schedule and a periodic review cycle for each audited area.

- The management system's key processes must be audited within the first 12 months of the initial declaration.
- Subsequent planning cycles must not exceed 36 months, or the duration of the competent authority's oversight cycle, whichever is shorter.
- Unscheduled audits should be triggered when data indicates an increasing trend in non-compliance.

Feedback and Corrective Actions: The compliance monitoring system must incorporate a direct feedback mechanism to the Accountable Manager.

- Audits must follow up on corrective actions to ensure they have been effectively implemented and completed according to the GHM.

Training for Auditors: Personnel responsible for compliance monitoring must receive specific training covering relevant manuals, auditing techniques, root cause analysis, reporting, and recording systems.

GHM, Record-Keeping, and Documentation (Subpart DOC)

Robust documentation and record-keeping are essential for demonstrating compliance during internal and external audits.

- **Compliance Monitoring Documentation:** The organization must maintain detailed documentation of its compliance monitoring programme, including audit plans, reporting procedures, root cause analysis procedures for internal findings, and the terminology and activity standards used. Small organizations may simplify this by utilizing a standardized compliance monitoring checklist and non-compliance report format.
- **Safety Risk Register:** The completion and maintenance of a safety risk register is considered one of the most relevant methods of compliance monitoring.
- **Alternative Means of Compliance (AltMoC):** When a ground handling organization utilizes an AltMoC, it must provide the competent authority with the list of AltMoCs and make them available prior to oversight audits. The organization must complete and document a safety risk assessment demonstrating that the AltMoC achieves an equivalent level of safety to the accepted AMC. Furthermore, the organization must coordinate with affected aircraft and aerodrome operators to ensure the AltMoC does not cause unintended consequences at operational interfaces.