

Evolution of the EASA Ground Handling Regulatory Framework

The European civil aviation sector is undergoing a historic structural shift in ground operations, transitioning from voluntary self-regulation and airline-contractual oversight to a formalized, legally binding European Union safety framework. Mandated under the EASA Basic Regulation (EU) 2018/1139 (specifically Articles 37(2), 39, and 62), this regulatory architecture introduces common safety standards, systematic oversight, and formal accountability for Ground Handling Organizations (GHOs).

Basic Regulation Mandates

Formal Accountability and the Declaration Mechanism (Article 37)

Article 37(2) fundamentally alters the liability and accountability landscape for ground handling. Historically, aircraft operators carried the primary regulatory burden for ground safety. Under this framework, ground handling organizations must now assume full, direct responsibility for the safe provision of their services and the control of their operational risks.

- **The Declaration of Capability:** Article 37(2) requires providers of ground handling services to submit a formal declaration regarding their capability and the availability of means to discharge their responsibilities for safe service provision.
- **Accountable Manager:** The framework mandates a clear line of accountability, requiring an Accountable Manager who holds ultimate responsibility for safety and compliance within the organization.
- **Direct Regulatory Obligations:** Ground handling organizations are legally bound to operate in accordance with Regulation (EU) 2018/1139, the specific terms of their submitted declaration, the local aerodrome manual procedures, and the aircraft operator's operational instructions.

Common Safety Standards (Article 39)

Article 39 provides the legal basis for the detailed industry mandates found in Delegated Regulation (EU) 2025/20. It ensures a total-system approach and establishes a baseline for safety across all ground operations.

- **State-of-the-Art Operations:** The rules reflect current best practices and take into account applicable International Civil Aviation Organization (ICAO) Standards and Recommended Practices, as well as worldwide ground handling experience.
- **Mandatory Safety Management Systems (SMS):** Organizations must develop and implement a management system with effective safety management processes capable of identifying hazards and managing safety risks. This includes risks arising from operational interfaces with aircraft and aerodrome operators.
- **Proportionality and Scalability:** The standards are designed to be proportionate to the size and complexity of the ground handling activities, providing necessary flexibility for customized compliance without compromising the safety baseline.

Systematic Oversight and Enforcement (Article 62)

Article 62 establishes the legal authority and operational requirements for National Aviation Authorities (NAAs) to conduct harmonized and consistent oversight of ground handling organizations. This forms the basis of Implementing Regulation (EU) 2025/23.

- **Risk-Based Oversight Programmes:** Competent authorities are required to develop and implement oversight programmes based on the safety risks of the ground handling activities and the safety performance of the organizations. This ensures oversight is fully covered and prioritized appropriately.
- **Authority Powers and Inspections:** Personnel authorized by competent authority are empowered to examine records, enter relevant premises, and perform audits, investigations, and inspections. This includes the authority to conduct unannounced inspections and ramp inspections as part of the oversight cycle.
- **Enforcement Measures:** Under Article 62, Member States must develop and implement enforcement measures. Authorities have the power to issue findings and, in the case of significant non-compliances that seriously jeopardize safety (Level 1 findings), take immediate action to limit or prohibit the affected ground handling activities until acceptable corrective actions are implemented.

Transition Timeline

To ensure an orderly implementation across the EU aviation eco-system, the European Commission established a phased transition timeline:

- **March 27, 2027:** Submission window opens for active GHOs to lodge their formal Declaration of Capability (Subpart DEC) with their designated National Aviation Authority (NAA).
- **March 27, 2028:** Full applicability of Commission Delegated Regulation (EU) 2025/20 and Commission Implementing Regulation (EU) 2025/23.
- **March 27, 2031:** Deferred applicability for Information Security Management Systems (Part-IS / ORGH.MGM.201), regulating cybersecurity risks in digital turnaround systems and automated Ground Support Equipment (GSE).

Structural Architecture of EU 2025/20 and EU 2025/23

The EASA ground handling framework is rooted in the EASA Basic Regulation (EU) 2018/1139 and branches into two complementary regulations that establish technical mandates for operators and oversight rules for authorities.

The first branch is the **Delegated Regulation (EU) 2025/20**, which outlines the Industry Requirements for GHOs.

- It is divided into Part-ORGH (Organization Requirements) and

- Part-GH.OPS (Operational Rules).

The second branch is the **Implementing Regulation (EU) 2025/23**, which establishes the Authority Oversight Framework.

- It is driven by Part-ARGH (Authority Requirements) and
- Specific provisions for Cooperative Oversight.

Commission Delegated Regulation (EU) 2025/20 (Industry Mandates)

Part-ORGH (Annex I - Organization Requirements):

- Mandates that every GHO establish:
 - a scalable Safety Management System (SMS) (ORGH.MGM.200),
 - an independent Compliance Monitoring function,
 - a Management of Change (MoC) process (ORGH.GEN.130),
 - a Competency-Based Training and Assessment framework (Subpart TRG), and
 - a structured GSE Maintenance Programme (Subpart GSE).

Part-GH.OPS (Annex II - Operational Requirements): Defines performance-based operational standards across all ground handling functions, including

- turnaround coordination (GH.OPS.400),
- aircraft arrival/departure procedures,
- fueling safety,
- de-icing/anti-icing,
- pushback/towing, and
- cargo/baggage acceptance.

Commission Implementing Regulation (EU) 2025/23 (Authority Oversight)

Part-ARGH (Annex - Authority Requirements): Defines the obligations of NAAs to register declarations, execute risk-based oversight programmes, and manage non-compliances.

- Oversight planning operates on a standard 48-month cycle, expandable up to 72 months for high-performing organizations with mature SMS and zero Level 1 findings.
- **Finding Classifications:** Enforcement actions are strictly categorized into Level 1 (critical safety hazard, loss of Accountable Manager, or denied NAA access requiring immediate operational limitation) and Level 2 (non-compliances requiring a corrective action plan within an initial 3-month timeline).

Global Interfaces: Harmonization with ICAO and IATA Frameworks

A core objective of the EASA regulatory design is avoiding duplication by aligning EU requirements with existing international civil aviation standards and industry best practices.

- The EASA Framework directly interfaces with ICAO Standards (ensuring EASA SMS and ground safety SARPs meet global baselines),
- IATA Operational Rules (providing direct regulatory recognition), and
- Third-Party Auditing (allowing NAAs to credit industry audit data).

Alignment with ICAO Standards

The framework directly incorporates standards and recommended practices (SARPs) from

- ICAO Annex 19 (Safety Management) and
- ICAO Doc 10121 (Manual on Ground Handling). It also harmonizes with
- ICAO Annex 6 (Operation of Aircraft),
- Annex 14 (Aerodromes),
- Annex 18 & Doc 9284 (Dangerous Goods), and
- Doc 9640 (Aircraft Ground De-icing/Anti-icing).

Voluntary Use of Industry Standards (IGOM, AHM, DGR)

Under ORGH.GEN.125 and ARGH.OVS.310, EASA allows GHOs to utilize recognized industry standards

- Such as the IATA Ground Operations Manual (IGOM),
- IATA Airport Handling Manual (AHM),
- IATA Dangerous Goods Regulations (DGR), or
- SAE de-icing specifications, to demonstrate compliance with EU regulations.
- EASA evaluates these standards against objective criteria to ensure they fulfill the regulatory intent without forcing GHOs to re-write functional operational manuals.

Integration of Industry Audits (ISAGO)

To reduce audit fatigue, ARGH.OVS.300 and AMC1 ARGH.OVS.300(d) permit NAAs to credit third-party industry audits (e.g., ISAGO or airline audit reports) when building an organization's safety risk profile.

- While third-party audits do not replace official NAA oversight, competent authorities can use mapped audit data to adjust audit frequencies and focus risk-based surveillance.

Tripartite Operational Interfaces (GHOs, Air Operators, Aerodromes)

Ground handling occurs at the dynamic operational intersection of air operations and aerodrome management. Regulations (EU) 2025/20 and 2025/23 establish legal mechanics to manage these organizational interfaces cleanly.

Ground Handling Organization to Aircraft Operator Interface

- **Ultimate Responsibility vs. Service Execution:** Air operators retain ultimate accountability for overall flight safety under Regulation (EU) No 965/2012 (point ORO.GEN.205).
 - EU 2025/20 establishes direct regulatory accountability for the GHO regarding the safety of its own ground handling activities.
- **Harmonized Standard Operating Procedures (SOPs):** Historically, GHOs faced severe safety risks caused by conflicting operational instructions from dozens of client airlines.
 - EU 2025/20 allows GHOs to utilize their own EASA-compliant operational procedures, provided they are formally agreed upon with the contracting air operator.

Ground Handling Organization to Aerodrome Operator Interface

- **Formal Aerodrome Arrangements (ORGH.GEN.115):** Prior to commencing operations at any station, a GHO must establish formal arrangements with the aerodrome operator.
- **Local Safety & Emergency Integration:** GHOs must integrate their local station operations with the aerodrome manual requirements (Regulation (EU) No 139/2014), including airside driving rules, Foreign Object Debris (FOD) control, adverse weather procedures, and the aerodrome Emergency Response Plan (ERP).

Multi-State Cooperative Oversight (ARGH.OVS.330)

For GHOs operating across multiple EU Member States, the framework introduces a Cooperative Oversight mechanism to eliminate duplicate authority audits:

- **Principal Place of Business (PPOB) Authority:** The NAA of the Member State where the GHO exercises corporate financial and operational control (PPOB) receives the master declaration and oversees the central Management System, SMS, training policy, and GSE maintenance strategy.
- **Host-State NAAs:** Local NAAs in other Member States oversee station-level operational execution on the apron.
- **EASA Information Repository:** All declarations, oversight plans, findings, and occurrence data are shared among NAAs via the centralized EASA Repository of Information (Article 74 of Regulation (EU) 2018/1139) to maintain a single, unified safety record for each ground handler.