

Scope Considerations related to EASA Ground Handling Part-ORGH and Exclusions (e.g., Marshalling, Flight Dispatch, Load Control).

Sofema Aviation (SA) considers key aspects of the forthcoming Ground Handling Regulations to include issues challenges and best practices Scope of Part-ORGH

Introduction

The scope of Part-ORGH, as defined in Article 2 of Regulation (EU) 2025/20, deliberately draws strict boundaries around what constitutes a ground handling (GH) service to prevent regulatory overlap with air operations, aerodrome operations, and aircraft maintenance.

Correctly identifying which of your services fall inside or outside this scope is critical, as misclassification can lead to either non-compliance or unnecessary administrative burdens.

The Scope of Part-ORGH

The regulation applies strictly to organizations providing specific services to aeroplanes at EU aerodromes. The services include cover the core physical activities of ground handling:

- **Passenger and Baggage Handling:** This includes safety aspects of passenger boarding/disembarkation, ground transportation between the terminal and aircraft, and the sorting, building, and transfer of baggage.
- **Aircraft Servicing and Turnaround:** This captures the operation of Ground Support Equipment (GSE), refuelling, toilet/water servicing, de-icing/anti-icing, securing the aircraft, loading/unloading, and towing/pushback.
- **Cargo and Mail Handling:** Only the activities occurring at the aerodrome, such as final build-up, final checks before air transport, and transportation to the aircraft, are included. Cargo activities at off-airport locations are excluded and remain under the aircraft operator's management system.

Specific Exclusions (Article 2(3))

To ensure a total-system approach without duplicating rules, several activities commonly associated with the apron are explicitly excluded from Part-ORGH because they are governed by other European regulations.

- **Flight Dispatch:** Excluded because it is considered a flight operations function under the operational control system of the aircraft operator (Regulation (EU) No 965/2012).
- **Load Control:** Tasks related to load planning, mass and balance calculations, and the issuance of load control documents (e.g., the load sheet) are excluded as they fall under air operations regulations.

- **Marshalling:** Excluded because the safe guiding of aircraft into a stand is an aerodrome operator responsibility covered by Regulation (EU) No 139/2014.
- **Ground Supervision:** Acting as an official administrative representative for an aircraft operator to oversee other ground handlers is excluded.
- **Maintenance Activities:** Oil handling, specific exterior cleaning, and moving GSE for maintenance purposes are excluded, as these are governed by continuing airworthiness rules (Regulation (EU) No 1321/2014).

Issues and Challenges for SMEs

Regulatory Fragmentation for Bundled Services: Many GHSP's offer a comprehensive suite of services to remain competitive.

- If your organization provides baggage handling (included), marshalling (excluded), and load planning (excluded), you are forced to navigate and comply with three entirely separate regulatory frameworks
 - Part-ORGH,
 - Aerodromes, and
 - Air OPS.
- When submitting your declaration, you must carefully carve out and omit the excluded services to avoid confusing your competent authority.

Terminology Confusion (The "Dispatcher" Trap): The term "dispatcher" is highly problematic. In air operations, a "flight dispatcher" represents operational control.

On the ramp, GHSP's often use "dispatcher" to describe the person coordinating the turnaround. This shared terminology can blur the lines of legal responsibility between the airline and the handler, potentially leading to critical safety gaps.

EASA ground handling guidance material explicitly addresses this terminology overlap to draw a firm legal line between air operations and ground operations.

- According to the regulation, the term "flight dispatcher" is formally defined in EASA Regulation (EU) No 965/2012 (Air Operations) and ICAO Annex 6. Under those rules, a flight dispatcher is recognized as an individual within the aircraft operator's operational control system who holds specific qualifications and training compliant with ICAO Annex 1 to support, assist, and brief the pilot-in-command.

Note The "trap". In ground operations, the term "dispatcher" is frequently used but remains legally undefined.

- On the ramp, this person is simply performing a ground function to confirm to the flight crew or the airline's actual flight dispatcher that all ground handling activities are complete and the aircraft is prepared to leave the stand.

Because using the same title for a regulated flight operations role and an unregulated ground handling task creates liability and safety ambiguities,

EASA officially recommends that ground handling organizations stop using the terms "flight dispatch" or "(flight) dispatcher" entirely.

Instead, handlers are urged to rename these ground roles to "ramp coordinator" or "ramp supervisor".

- This ensures there is zero confusion about whether the staff member is exercising legal operational control over the flight or simply managing the turnaround.

The Split Load Control Process: EASA divides load control into two phases.

- Phase 1 (planning and mass & balance calculations) is excluded from Part-ORGH and is the airline's responsibility.
- Phase 2 (the physical verification of the load against instructions at the aircraft) is included and is the ground handler's responsibility.
 - GHSP,s often struggle to define where their liability begins and ends during last-minute load changes at the aircraft side.

Best Practices

- **Standardize Job Titles:** Eradicate the use of the term "flight dispatcher" or "dispatcher" for ground personnel preparing an aircraft for departure.
 - Transition your internal manuals and training to use terms like "ramp coordinator" or "ramp supervisor" to clearly delineate that their function falls under Part-ORGH, not the airline's flight operations.
- **Map Your Service Boundaries:** Conduct a strict audit of your Service Level Agreements (SLAs). Clearly map which activities are Part-ORGH ground handling versus which are contracted operational tasks under Regulation (EU) No 965/2012. This is especially crucial for cargo SMEs; you must distinctly separate off-airport acceptance tasks from on-airport final checks.
- **Precision in Declarations:** When you submit your operational declaration, explicitly list only the services defined in Article 2(2).
 - If you also provide marshalling or ground supervision, leave them off the Part-ORGH declaration form entirely, as they are managed under different compliance frameworks.

Marshalling

Under the new EASA framework, the "approval" process for services like marshalling requires a paradigm shift in how an GHSP views regulatory compliance.

- Because marshaling is explicitly excluded from the scope of the Ground Handling regulation (Regulation (EU) 2025/20), it is not approved or authorized through the new ground handling declaration process.

- Instead, the safe guiding of aircraft into a stand is fundamentally considered an aerodrome safety function. Therefore, organizations providing aircraft marshalling services must comply with the requirements of the Aerodromes regulation (Regulation (EU) No 139/2014).

Here is an in-depth look at how an GHSP actually secures approval and manages compliance for marshalling, along with the associated challenges and best practices.

How the "Approval" Mechanism Works

For GHSP's Providing ONLY Marshalling: If your organization solely provides marshalling services, you are completely exempt from Regulation (EU) 2025/20 and do not need to submit a ground handling declaration.

- Your "approval" to operate is derived directly from your compliance with Regulation (EU) No 139/2014 and your formal operational agreements with the local aerodrome operator.

For GHSP's Providing Mixed Services: If your organization provides both marshalling and included ground handling services (such as baggage handling or aircraft servicing), you fall under dual jurisdictions.

- You are required to submit the ground handling declaration for your included services under Regulation (EU) 2025/20, but you must explicitly exclude the marshalling services from that declaration. Your marshalling activities remain governed and overseen through the aerodrome's regulatory framework.

Operational Issues and Challenges for GHSP,s

Dual Regulatory Oversight (Audit Fatigue): The most significant challenge for an GHSP providing mixed services is navigating two different compliance frameworks.

- You will be subject to oversight by ground handling inspectors for your ramp activities, and simultaneously subject to aerodrome oversight (and aerodrome operator audits) for your marshalling activities.

Integrating the Manuals: SMEs often try to put all their operational procedures into a single, cohesive manual to make things easy for frontline workers. However, because marshalling is governed by Regulation (EU) No 139/2014 and standard ground handling is governed by Regulation (EU) 2025/20, creating a single manual that satisfies both sets of regulators without causing confusion about legal boundaries is a delicate administrative balancing act.

Aerodrome Dependency: Because marshalling falls under aerodrome rules, your operational procedures for marshalling cannot exist in a vacuum; they must perfectly align with the local procedures contained within the specific aerodrome manual where you operate.

- If you operate at multiple aerodromes, you may have to maintain different marshalling procedures for each location, making standardization highly difficult.

Best Practices for GHSP's

Physical and Digital Demarcation in Documentation: If you maintain a single overarching operational manual, clearly demarcate which sections apply to Part-ORGH (Ground Handling) and which sections apply to Regulation (EU) No 139/2014 (Aerodromes).

- Use distinct chapters or visual indicators. When the competent authority requests your manual to verify your ground handling declaration, you only need to submit the parts of your manual that show compliance with Regulation (EU) 2025/20.

Align Training Matrixes: Ensure your training records clearly differentiate between ground handling competency assessments and marshalling competency assessments.

- Since the regulatory basis is different, an auditor reviewing your training program needs to easily separate your Part-ORGH compliance from your aerodrome compliance.

Proactive Aerodrome Coordination: Since the aerodrome operator is ultimately responsible for the safe operation of the aerodrome under Regulation (EU) No 139/2014, treat them as your primary regulatory partner for marshalling.

- Ensure your local formal arrangements clearly define your marshalling responsibilities and audit schedules to avoid duplication of effort when the national aviation authority conducts its oversight.

Load Control

EASA structurally divides the load control process into two distinct phases with entirely different regulatory owners.

- Phase 1 encompasses
 - mass and balance calculations,
 - load planning,
 - load control communications, and
 - the issuance of mass and balance documentation such as the load sheet,
 - Loading Instructions/Report (LIR), and
 - Notification to Captain (NOTOC).

Because this phase is directly tied to the aircraft operator's operational control, it remains strictly governed by Regulation (EU) No 965/2012 (Air Operations) and is explicitly excluded from the new ground handling rules.

- Phase 2 consists of the physical verification of the load against the loading instructions at the aerodrome and the communication of any last-minute changes to the mass and balance documentation.
- This second phase falls squarely within the scope of the ground handling organization under Regulation (EU) 2025/20.

Issues and Challenges for GHSP's

Contractual and Oversight Overlap: SMEs frequently provide both centralized load control (Phase 1) and ramp handling (Phase 2) under a single commercial contract to an airline.

- However, the aircraft operator and their competent authority oversee Phase 1 as an outsourced flight operations activity, while the local aerodrome's competent authority oversees Phase 2 as a ground handling service.
- Managing dual oversight for what feels like a single, continuous operational process creates significant administrative friction.

The Remote vs. Local Disconnect: Phase 1 load control is specific to the operator's fleet and is frequently performed at a remote or off-airport location, whereas Phase 2 inherently occurs on the apron.

- When last-minute changes occur at the aircraft, the interface between the remote load controller (acting under Air Ops rules) and the local ramp coordinator (acting under Ground Handling rules) becomes a critical safety vulnerability where communication breakdowns can easily occur.

Ultimate Responsibility: Even when Phase 1 is outsourced to an GHSP, the aircraft operator remains ultimately responsible for ensuring those calculations and documents comply with Regulation (EU) No 965/2012. Conversely, the GHSP is formally accountable for the Phase 2 verifications at the aircraft. Navigating this split liability requires incredibly precise documentation.

Best Practices for GHSPs

Distinct SLA Mapping: Segregate Phase 1 and Phase 2 activities clearly within your Service Level Agreements and operational manuals.

- Treat Phase 1 strictly as an outsourced Air Ops function covered under ORO.GEN.205 of Regulation (EU) No 965/2012, and Phase 2 as your declared ground handling responsibility.

Strengthen Interface Procedures: Develop robust, standardized communication protocols specifically for last-minute changes at the aircraft.

- The handoff of information between the person performing the mass and balance calculations and the person verifying the load at the aircraft must be seamless to ensure the aircraft is safely and efficiently loaded before each flight.

Separated Training and Audit Records: Keep training records and compliance checklists for centralized load planners distinct from those of your apron staff managing Phase 2 verifications.

- This ensures that when the ground handling competent authority audits your ramp operations, they are not entangled in training records that belong under the aircraft operator's oversight.