



EASA Ground Handling Regulations Consultation

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1. The Current Situation Regarding the Approval of Ground Handling Operations

Introduction

The Irish Aviation Authority (IAA) is the competent authority in Ireland for the purposes of Council Directive 96/67/EC on access to the Groundhandling market at Community airports. This Directive has been implemented into Irish Law by the European Communities (Access to the Groundhandling Market at Community airports) Regulations, 1998 (S.I. No. 505 of 1998).

Groundhandling broadly comprises all those services required by an aircraft between landing and take-off (e.g. marshalling aircraft, loading/unloading, refuelling, baggage handling, passenger handling, aircraft maintenance etc.). An airline may choose to provide services for itself (self-handling), or contract with another company (third party handling), be it an airline or a dedicated Groundhandling company. The relevant categories of groundhandling services are set out under Schedules I and II of S.I. 505 of 1998.

The Directive was intended as a first step towards the gradual opening up of access to the Groundhandling market and also to help reduce the operating costs of air carriers, to improve quality of service and to facilitate effective competition in that market. The Directive witnessed the introduction of liberalisation in the groundhandling market at Community airports with accompanying measures.

Approvals Process

The Directive provides that Member States may make the groundhandling activity of a supplier of groundhandling services or a self-handling user at an airport conditional upon obtaining the approval of a public authority independent of the managing body of the airport. On implementation, Ireland opted for this and there is an Approvals process in place. This role was previously implemented by the Commission for Aviation Regulation and is now the responsibility of the Commercial Aviation Licensing Department in the IAA.

Approval is necessary for firms operating at airports with over 1 million passengers or 25,000 tonnes of freight. Applicants must complete an application form and also meet a number of requirements before an approval to operate as a ground handler can be issued. Regulation 12 (3) of S.I. 505 of 1998 sets out the requirements to be met by applicants as follows:

(a) is competent, as respects experience, financial resources, equipment, organisation, staffing, maintenance, and operating procedures to ensure the security and safety of installations, of aircraft, of equipment and of persons,

(b) is adequately insured to cover liability in respect of employees, passengers, luggage, cargo, mail and third parties, and



(c) in respect of its employees, complies with the requirements of the Acts mentioned in Schedule III.

Groundhandling Approvals are issued for a period of five years and approval is subject to the holder satisfying certain conditions at all times. This requires annual monitoring. After the five-year timeframe, Groundhandling approvals can be renewed following the successful completion of the IAA's renewal process. Approvals can be withdrawn for failure to comply with any of the criteria for granting an Approval. The fee payable in respect of an application for a Groundhandling Approval is currently €2,515 and this applies every year thereafter to cover administration and monitoring costs.

Groundhandling Approvals can be amended to reflect the provision of new activities or the provision of groundhandling services at a new airport location and there is an approval amendment process in place.

In addition to the IAA Approvals process, applicants are also required to complete a separate process for the relevant airport authority where they intend to operate (both processes usually completed simultaneously by the applicant).

10 self-handling airlines and 39 suppliers of groundhandling services are currently approved by the IAA across Dublin, Cork, and Shannon Airports.

Other Measures

The legislation recognises that access to the market may come up against safety, security, capacity and available-space constraints and it may be necessary to be able to limit the number of self-handlers/suppliers using relevant, objective, transparent and non-discriminatory criteria. The managing body of an airport may apply to the IAA to limit the number of ground handlers operating at a particular airport. The Airport Users Committee shall be consulted if such a course of action is to be followed. No such restrictions are in force at any Irish airport.

The managing body of an airport may also apply to the IAA to reserve for the managing body of the airport or for another person, the management of any centralized infrastructures used for the supply of groundhandling services, the complexity, cost or environmental impact of which does not allow for division or duplication, such as baggage sorting, de-icing, water purification and fuel distribution systems.

Airport authorities are also entitled to charge a fee for access to airport installations. Where a decision is taken by the airport authority to impose a fee in respect of access to airport installations, the airport authority is required to submit to the IAA in advance, a request for approval of the proposed fee in accordance with the criteria set out in S.I. No. 505 of 1998. In



In addition, the space available for groundhandling at an airport shall be allocated by the managing body of the airport among the various suppliers and self-handlers, including new entrants in the field, to the extent necessary for the exercise of their rights and to allow effective and fair competition, on the basis of relevant, objective, transparent and non-discriminatory criteria.

The Directive also provides that the managing body of airport may establish rules of conduct to ensure the proper functioning of the airport. The IAA can prohibit a ground handler from operating if they fail to comply with the rules of conduct imposed by the managing body of the airport. There is an escalation process in place between the IAA and the relevant airport authorities whereby any non-compliance is detected and monitored in an efficient manner.

2. The Current Situation Regarding the Safety Oversight of Ground Handling Operations

The IAA has employed a Ground Operations Inspector for over 20 years with the current inspector in place since 2015.

The Ground Operations Inspector is a part of the Flight Operations Department. This Inspector conducts audits and inspections of the ground operations of AOCs (both self-handling and 3rd party handlers) through the contracted activities part (ORO.GEN.205) of Regulation (EU) 965/2012.

The audits and inspections involve travel to AOCs operations within the Island of Ireland and worldwide, particularly for the Irish AOCs that have no presence in Ireland. Audits and inspections are based on the contents of the AOCs approved Ground Handling Manual, the loading aspects of the Mass and Balance regulation (CAT.POL.MAB.100), certain operational parts of Dangerous Goods regulation, CAT.OP.MPA.205. The oversight of push back and towing of aircraft, and parts of the management system regulations as to how the ground handling service provider interacts with the AOCs management system, are regulated in accordance with Regulation (EU) 965/2012.

The Ground Operations Inspector also attends all comprehensive audits to assess the AOCs safety management and compliance monitoring from a ground handling perspective.

3. Proposed EASA Ground Handling Regulations

EASA have been developing legislation to provide for harmonised European aviation safety standards for ground handling. This will also involve amendment to Part-IS, Aerodromes and Operations Regulations. The Regulations will include provisions for organisations providing services in more than one Member State, and for organisations being overseen by Competent Authorities in a number of Member States, including the mutual recognition of declarations and is based on Opinion No 01/2024 relating to Ground Handling Requirements (RMT.0728).



The regulations will adopt a performance-based approach, overseen by Competent Authorities. This legislation will involve both an implementing act and a delegated act. The main components are an SMS, training, maintenance of equipment and operation of ground handling services.

The proposed safety regulations will be based on a declaration regime, or a 'sign-and-start' regime. This will involve a declaration to be made to the Competent Authority where the organisation has its PPOB. This declaration will then cover all the aerodromes where the organisation provides services. However, in Ireland, the commencement of operations will still be subject to holding an Approval in accordance with S.I. 505 of 1998.

Some areas already covered under other regulations, like oil handling, will not be regulated under this new regulation. Self-handling will only apply to CAT with complex motor-powered aeroplanes and will not apply to helicopters.

The organisation requirements will be aligned to those in other aviation domains. It is expected that occurrence reporting is currently low and will have to develop along with a maturing of safety culture and safety awareness. Ground support will have a mandatory maintenance programme.

The requirements for Competent Authorities which are aligned with the other domains in safety management, e.g. management systems. Inspector training and qualifications will have to be developed, as not all Competent Authorities have these skills, and there will be a degree of flexibility to enable inspectors with prior technical experience to undertake the tasks.

The training of GH personnel will involve an initial training with continuity training. This is expected to be difficult due to the high turnover of personnel. It is not intended to introduce a competency-based system in the first instance, but it is expected that this will follow. It is expected that an individual will be able to take their training records for recognition purposes and mobility of GH personnel. The training will also involve a training needs analysis to determine what additional training is required when staff move organisations.

There will be a new approach with respect to industry standards, which have been available to industry for many years, and are recognized as being of a high standard. These established industry standards will be adopted and developed further within the regulatory framework.

The operational requirements and procedures will be developed by the organisations themselves, and a standard set of procedures will not be directed by EASA. Rather, EASA will set out the safety objectives, and the detailed operational provisions and procedures will be set out by organisations based on their practical experience. The operational requirements will also make provision for collaboration between air operators and aerodrome operators.



Operators will remain responsible for the aircraft's safety, but GH will be required to comply with the aerodrome operators' procedures, or the procedures set out by the air operator.

A central consideration will be cooperative oversight by Competent Authorities, as many of the GHSPs operate across the Union in many Member States. This will involve shared responsibilities amongst all the Authorities involved, which will share oversight reports and corrective actions, to gain efficiencies. This cooperative oversight will involve a 'hub and spoke' approach. The Hub will be overseen by the Competent Authority where the organization has its PPOB, and they will oversee the organisation's management system. This competent Authority will be responsible for managing the findings, to ensure that there is no duplication of findings across several stations.

The oversight cycle will be 48 months, with a possibility to extend to 72 months. This cycle can be lowered where an organization shows a lowered safety performance. Not all stations of a GH organization must be verified in a cycle. To provide sufficient time for Competent Authorities to conduct initial oversight, a 5-year period will be set to conduct audit/inspection to verify the organization. This will then progress towards a risk-based approach after the 5-year period.

The adoption of industry standards will not be undertaken by Member States, but by EASA with the cooperation of Member States. This will involve one assessment of the standards, once, and by EASA. This will reduce the workload on Competent Authorities as EASA will verify the standards and Competent Authority inspectors will have to ensure that the Ground Handling organisation is maintaining compliance with the Regulations.

Some Member States, like Ireland, already approve ground handling operations, while others do not have an approval system. The new safety system introduced under the EASA Regulations will involve a declaration system, which will work in parallel to the existing requirement for an approval in accordance with S.I. 505 of 1998.

4. Considerations

Ireland currently has an approvals system, previously implemented by the Commission for Aviation Regulation, and now under the responsibility of the IAA. This approvals system gives effect to Council Directive 96/67/EC on access to the Ground handling Market at Community airports and the Directive is implemented into Irish law by S.I. 505 of 1998.

In this regard, Ireland is an outlier, as many Member States do not have a safety oversight system for ground handling or a licensing system to regulate access to the ground handling market. In some respects this will make the transition easier for Ireland, as we already have many of the building blocks in place. However, it will require a change to the way we regulate



ground handling services, and this will have to be coordinated across a number of existing functions, including Commercial Aviation Licensing, Flight Ops and Aerodromes.

Consideration will have to be given to small operators and organisations. EASA have produced a Regulatory Impact Assessment, which considers both small and large organisations. It is expected that implementation costs will arise in the first 3 – 5 years. However, the status quo is not cost neutral, as there is a cost for an audit regime. To simplify the regulatory requirements, EASA have integrated SMS at the core of this Regulation, in like manner to the other aviation safety regulations.

It will be necessary to provide for requirements for Dangerous Goods and the training of personnel. This will be clarified at AMC level. There will be a degree of flexibility for Member States and Competent Authorities, and the objective of the IAA is to introduce the least burdensome level of regulatory requirements possible. It will be possible to draw on the expertise of personnel already qualified in in this area, and other areas, which can be integrated in the new ground handling oversight system.

This regulation will involve a declaration system. EASA also intend to provide a digital platform to share all the documentation of an organisation that is subject to oversight across a number of Member States. This will include audit findings and corrective action plans.

The cooperative oversight approach to ground handling organisations will involve a hub and spoke structure with the Competent Authorities of the Member States where the organisation has its principal place of business, or Management System. The tasks of the hub Competent Authority and the spoke Competent Authority will be set out in in the Regulation.

There is a requirement for the sharing of information between the Hub Competent Authority and the Spoke Competent Authorities, in particular the ground handling manual, an SMS manual if that is separate, SOPs, AltMoCs, organisations structure, process for the management of change, which should be the same at all bases, all written documentation, risk assessments and mitigations, compliance monitoring system, maintenance programme of ground handling equipment, audit reports, including findings, root cause analysis, corrective actions and follow up actions, and occurrence reports.

There will also be requirements on Spoke Competent Authorities to communicate certain information with the Hub Competent Authorities. This will involve sharing of audit reports, findings, corrective action plans, implementation of corrective actions, follow up actions, and occurrence reports that have been analysed.

EASA are currently engaged with Swissport on a pilot study in relation to the implementation of these regulations and will report back in Q4 2024. There has been a network of ground handling inspectors established and they are focussing on the development of the training for ground handling inspectors, checklists, and manuals, etc.



Regulation (EU) 965/2012 will be amended to include definitions for ‘ground supervision’ and ‘load control’.

Existing ground handling organisations that are already providing services must submit their declaration a year prior to the Regulation coming into effect.

Insofar as aerodromes are concerned, the Delegated Regulation will require the exchange of information under Regulation (EU) 139/2014 relating to Aerodromes, which will have to be integrated into the aerodrome’s manual. The amendments of the Aerodromes Regulation and the Ops Regulation will involve changes regarding the ground supervision procedures, the removal of the refuelling supervisor, and the requirements for fire extinguishers.

The changes to the ground handling requirements will also involve a link between ground handling organisations to the Part-IS requirements. While a general transition period of 3-years is proposed, the Part-IS provisions will not become applicable for 6-years. It is expected that detailed ACMs and GMs on Part-IS will be published, which will support ground handling organisations with their implementation of changes to integrate the Part-IS requirements. However, as many of our ground handling organisations are already subject to the oversight of Regulation (EU) 200/2008 on AvSec, these requirements are likely incorporated already.

5. Correlation Table of Regulated Entities under both Regimes

Regulated Entity (EU 96/67)	Regulated under EASA?	Aerodrome
Self-Handlers		
Aer Lingus	Yes	Dublin, Cork, Shannon
American Airlines	No (but requires review)	Dublin, Cork, Shannon
ASL Airlines	No (but requires review)	Dublin, Cork, Shannon
CHC Ireland	No	Dublin, Cork, Shannon
Bristow	No	Dublin, Cork, Shannon
Delta Airlines	No (but requires review)	Dublin, Cork, Shannon
Ryanair DAC	Yes	Dublin, Cork, Shannon
Westair Aviation	Yes	Dublin, Cork, Shannon
Emerald Airlines	Yes	Dublin, Cork, Shannon
El Al	No	Dublin, Cork, Shannon
Third Party Handlers		

Alliance Aviation Group Limited	Yes	Dublin, Shannon
Dnata Catering Ireland Limited	Yes (But requires review)	Dublin, Cork, Shannon
Delta Airlines Dublin Limited	No	Dublin
Dublin Aerospace Limited	Yes	Dublin
FedEx Express Ireland Limited	Yes	Dublin, Shannon
Worldwide Flight Services (Ireland) Limited	Yes	Dublin, Cork, Shannon
Sky Handling Partner	Yes	Dublin, Shannon
Swissport	Yes	Dublin, Cork, Shannon
Business Aviation Centre	Yes	Cork
Aer Lingus	Yes	Dublin, Cork, Shannon
Westair Aviation	Yes	Shannon
Oxalis Logistics	No	Dublin
DHL Supply Chain	Yes	Dublin
DHL Express	Yes	Dublin, Cork, Shannon
Fingal Aviation Services	No	Dublin, Cork
AAG Hangar	Yes	Shannon
Lightning Aviation Ltd	Yes	Dublin, Cork, Shannon
ACA Air Cargo	Yes	Dublin
United Parcel Services	Yes	Dublin, Shannon
ASL Ireland	Yes (But required review)	Dublin, Shannon
Atlantic Aviation Group Ltd	Yes	Shannon
Direct Maintenance Ireland Ltd	Yes	Dublin
Signature Flight Support	Yes	Dublin, Shannon
EFG Inflight Support	Yes	Shannon

Gate Gourmet	Yes	Dublin
BOS Aerospace	No	Dublin, Shannon
AirOps	Yes	Dublin
Emerald Airlines	Yes	Dublin
Exolum Aviation	No	Shannon
International Aerospace Coatings	Yes (but review required)	Dublin, Shannon
US Alliance Flight Support	Yes	Shannon
Oceanbridge Groundhandling Ltd	Yes	Dublin, Shannon
OCS	Yes	Dublin, Cork
Fenix Logistix Ltd	Yes	Dublin
Carousel Logistics Ltd	Yes	Dublin
Petrogas Group Ltd	No	Dublin
Bidvest Noonan	Yes (but review required)	Shannon
Ferrari Logistics Ltd	Yes	Dublin
ICTS Ltd	Yes	Dublin, Shannon

6. Conclusions and Recommendations

Having assessed the impact of the proposed groundhandling regulations, it is proposed to maintain the existing approvals process for groundhandling services. This will not involve any regulatory or legislative changes at the national level and will retain the existing high level of economic and technical competence oversight.

It is also proposed to broaden the existing safety oversight of groundhandling services associated with Irish AOC holders to provide for the implementation of the incoming EASA Groundhandling Regulations.



It is further proposed to introduce cross domain procedures within the IAA to coordinate and align the economic and safety oversight domains to ensure a harmonised approach and to avoid duplication of effort for regulated entities.

Finally, it will be necessary to introduce cross-domain collaboration in respect of the enforcement relating to groundhandling approvals and declarations.

Comments and observations on the implementation of the proposed groundhandling regulations is invited for interested parties. Submissions may be made by email to consultation@iaa.ie before the 31st of December 2024.