Germany: Crew Being Charged for Sneaky Security Checks

OPSGROUP Team
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Key Points

- **July 2024: We wrote about some strange happenings reported by OPSGROUP members at German airports – random security checks performed by LBA staff (Germany's Civil Aviation Authority) to ensure the proper protocols were being followed by crew.**
- **These are not ramp checks, they are sneaky checks to see whether crew follow the right security procedures. They basically try to enter the aircraft, and your job is to make sure you stop them.**
- **Jan 2025: We're now hearing that the LBA have started charging operators for these checks! One member reported receiving a 330 Euro invoice for a check that took place at EDDM/Munich. Another reported the same thing at EDDV/Hannover and EDDS/Stuttgart. It seems that opting-out of these checks is not possible!**

Surprise invoices

In December and we received a fresh report from an OPSGROUP member. During a recent stop at **EDDM/Munich**, they were the unwitting recipients of one these surprise security checks.

Later, they received an invoice from the LBA for 330 Euros – despite having no ability to opt out. Here's an excerpt:

Gebühren

Amtshandlung	Rechtsgrundlage für die Gebührenerhebung	Anzahl	Einzelbetrag EUR	Gesamtbetrag EUR
Vor- und Nachbereitung einer Inspektion LFU / Pre- and post-processing of an air carrier inspection	§ 1 LuftSiGebV i.V.m. Ziffer 17.2.1.1 Geb.- u Ausl.Verz.	1,00	271,50	**271,50**
Durchführung der Inspektion beim LFU / Inspection at the air carrier	§ 1 LuftSiGebV i.V.m. Ziffer 17.2.1.2 Geb.- u Ausl.Verz.	1,00	29,26	**29,26**
			Summe Gebühren	**300,76**

Auslagen

Auslagen	Rechtsgrundlage für die Gebührenerhebung	Anzahl	Einzelbetrag EUR	Gesamtbetrag EUR
Dienstreisekosten (Reisezeiten) Inspektion LFU / official travel expenses (travel times) air carrier inspection	§ 1 LuftSiGebV i.V.m. Ziffer 19.1 Geb.- u Ausl.Verz.	1,00	29,26	**29,26**
			Summe Auslagen	**29,26**

What the LBA had to say

It was the first we had heard of crew being involuntarily invoiced for these random security inspections and so reached out to the LBA directly.

Apparently, a legal document called the **Aviation Security Fees Ordinance** (or *Luftsicherheitsgebührenverordnung* for short) was amended in February 2024 to enable LBA to collect fees to cover the costs of 'surveillance measures' which includes the surprise security checks in question.

Fair or not, it looks as though this practice will continue at German airports indefinitely.

The checks themselves

We previously enquired as to the **legality** of these checks and were referred by the LBA to another document – the EU Implementing Regulation 2015/1998 which is all about *basic standards on aviation security*.

We read it so you don't have to – and couldn't find anything in it warning crew to look out for weird notes or unwelcome visitors in high-viz vests entering your aircraft with no ID.

The legal framework is there, but from an operational perspective but we still have the following concerns:

- **Crew are being tricked into compliance.**
- **These invasive checks have now been incentivized.**
- **There is no ability for crew to opt out of being charged.**

Aviation security is a team effort, not a commercial enterprise. And for that reason, we feel this a concerning precedent to set.

Security checks are distinct to traditional ramp checks.

Please get in touch with us

When we write Ops Alerts to members we have a specific category for costs, as they often come as an **unwelcome surprise** to operators. We do our best to get the word out to help others. If you come across these in your travels, please reach out to us on team@ops.group so that we can keep the group informed.