



Notice of Proposed Amendment 2025-101(A)

in accordance with Article 6 of MB Decision 01-2022

Regular update of the Acceptable Means of Compliance and Guidance Material to Regulations (EU) 2023/203 and 2022/1645 (Part-IS regulatory package)

RMT.0753 SUBTASK 1

EXECUTIVE SUMMARY

This Notice of Proposed Amendment proposes updates to the Guidance Material (GM) to the Part-IS regulatory package (Regulations (EU) 2022/1645 and 2023/203).

The objective of the proposed GM is to support and facilitate the application of the regulatory package, thereby maintaining a high level of safety and contributing to the protection of the aviation system against information security (cybersecurity) risks.

REGULATION(S) TO BE AMENDED/ISSUED

N/A

ED DECISIONS TO BE AMENDED

ED Decision 2023/008/R – AMC & GM to the Articles of Regulation (EU) 2022/1645 and Regulation (EU) 2023/203
ED Decision 2023/009/R – AMC & GM to Part-IS.D.OR and AMC & GM to Part-IS.I.OR
ED Decision 2023/010/R – AMC & GM to Part-IS.AR

AFFECTED STAKEHOLDERS

DOA and POA holders, Part-ORO air operators, AeMCs, FSTD operators, U-space service providers and single common information service providers, apron management service providers, AOC holders (CAT), MOs, CAMOs, training organisations, ATM/ANS providers, aerodrome operators, Member States and national competent authorities (NCAs).

WORKING METHOD(S)

Development

By EASA

Impact assessment(s)

Light

Consultation

NPA — Focused (EASA Advisory Bodies)

Related documents / information

ToR RMT.0753, issued on 20.2.2025

PLANNING MILESTONES: Refer to the latest edition of the EPAS Volume II.

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1. About this NPA

1.1. How this regulatory material was developed

This rulemaking activity aims at updating the guidance material (GM) to the Part-IS regulatory package (Regulations (EU) 2022/1645¹ and 2023/203²). It is included in the 2025 edition of Volume II of the European Plan for Aviation Safety (EPAS) for 2023-2025³ under Rulemaking Task (RMT).0753.

EASA developed the regulatory material in question in line with Regulation (EU) 2018/1139⁴ (the Basic Regulation) and the Rulemaking Procedure⁵, as well as in accordance with the objectives and working methods described in the Terms of Reference (ToR) for this RMT⁶.

In particular, EASA has developed a significant part of the regulatory material based on the guidelines developed by the Part-IS Implementation Task Force (TF), a collaborative effort of the national competent authorities (NCAs) of the EASA Member States. The Task Force worked with great care to produce a comprehensive set of guidelines aimed at ensuring a harmonised implementation of Part IS in all Member States. This initiative is part of an ongoing commitment to maintain high standards of aviation safety throughout the European Union.

¹ Commission Delegated Regulation (EU) 2022/1645 of 14 July 2022 laying down rules for the application of Regulation (EU) 2018/1139 of the European Parliament and of the Council, as regards requirements for the management of information security risks with a potential impact on aviation safety for organisations covered by Commission Regulations (EU) No 748/2012 and (EU) No 139/2014 and amending Commission Regulations (EU) No 748/2012 and (EU) No 139/2014 (OJ L 248, 26.9.2022, p. 18) (http://data.europa.eu/eli/reg_del/2022/1645/oj).

² Commission Implementing Regulation (EU) 2023/203 of 27 October 2022 laying down rules for the application of Regulation (EU) 2018/1139 of the European Parliament and of the Council, as regards requirements for the management of information security risks with a potential impact on aviation safety for organisations covered by Commission Regulations (EU) No 1321/2014, (EU) No 965/2012, (EU) No 1178/2011, (EU) 2015/340, Commission Implementing Regulations (EU) 2017/373 and (EU) 2021/664, and for competent authorities covered by Commission Regulations (EU) No 748/2012, (EU) No 1321/2014, (EU) No 965/2012, (EU) No 1178/2011, (EU) 2015/340 and (EU) No 139/2014, Commission Implementing Regulations (EU) 2017/373 and (EU) 2021/664 and amending Commission Regulations (EU) No 1178/2011, (EU) No 748/2012, (EU) No 965/2012, (EU) No 139/2014, (EU) No 1321/2014, (EU) 2015/340, and Commission Implementing Regulations (EU) 2017/373 and (EU) 2021/664 (OJ L 31, 2.2.2023, p. 1) (http://data.europa.eu/eli/reg_impl/2023/203/oj).

³ [European Plan for Aviation Safety \(EPAS\) 2025 - 14th edition | EASA](#)

⁴ Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ L 212, 22.8.2018, p. 1) (<http://data.europa.eu/eli/reg/2018/1139/oj>).

⁵ EASA is bound to follow a structured rulemaking process as required by Article 115(1) of Regulation (EU) 2018/1139. Such a process has been adopted by the EASA Management Board (MB) and is referred to as the 'Rulemaking Procedure'. See MB Decision No 01-2022 of 2 May 2022 on the procedure to be applied by EASA for the issuing of opinions, certification specifications and other detailed specifications, acceptable means of compliance and guidance material ('Rulemaking Procedure'), and repealing Management Board Decision No 18-2015 ([EASA MB Decision No 01-2022 on the Rulemaking Procedure, repealing MB Decision 18-2015 \(by written procedure\) | EASA](#)).

⁶ [ToR RMT.0753 - Cybersecurity risks | EASA \(europa.eu\)](#)

1.2. How to comment on this NPA

The draft regulatory material is hereby submitted for consultation with the EASA Advisory Bodies (MAB and SAB) in accordance with the ToR for this RMT.

NPA 2025-101 is divided in two parts. The present NPA 2025-101 (A) includes the background information pertaining to the regulatory proposal. NPA 2025-101 (B) includes the proposed amendments.

In order to facilitate the review, EASA will organise a virtual workshop on 5 May 2025.

Please submit your comments via email to cybersecurity@easa.europa.eu.

The deadline for the submission of comments is **23 May 2025**.

1.3. The next steps

Following the consultation of the draft regulatory material, EASA will review all the comments received and will duly consider them in the subsequent phases of this rulemaking activity.

Considering the above, EASA may issue a Decision updating the acceptable means of compliance (AMC) and guidance material (GM).

When issuing the Decision, EASA will also provide feedback to the commentators and information to the public on who engaged in the process and/or provided comments during the consultation of the draft regulatory material, which comments were received, how such engagement and/or consultation was used in rulemaking, and how the comments were considered.

2. In summary — why and what

2.1. Why we need to act — issue/rationale

Commission Implementing Regulation (EU) 2023/203 and Commission Delegated Regulation (EU) 2022/1645 lay down rules for the identification and management of information security risks in aviation organisations and aviation competent authorities, including EASA. The Part-IS TF has identified some areas where more guidance would have been useful to support harmonised implementation between Member States (MSs). To this end, this NPA proposes updates to the GM for the application of both the Implementing and Delegated Commission Regulations, mostly resulting from the joint activity of MSs.

2.2. Who is affected by the issue

DOA and POA holders, Part-ORO air operators, AeMCs, FSTD operators, U-space service providers and single common information service providers, apron management service providers, AOC holders (CAT), MOs, CAMOs, training organisations, ATM/ANS providers, aerodrome operators, MSs and NCAs.

2.3. What we want to achieve — objectives

The overall objectives of the EASA system are defined in Article 1 of the Basic Regulation. The regulatory material presented here is expected to contribute to achieving these overall objectives by addressing the issue described in Section 2.1.

More specifically, with the regulatory material presented here, EASA intends to facilitate the harmonised implementation of the Part-IS regulatory package.

2.4. How we want to achieve it — overview of the amendments

The Part-IS regulatory package introduces mostly performance- and risk-based provisions for the identification and management of information security risks in aviation organisations and aviation competent authorities. EASA proposes updates to the GM to provide further insight into how certain requirements should be understood from the Agency's point of view and advice on the practical aspects related to the implementation of the requirements (how to). This is also done by referring to available industry standards that could be used to demonstrate compliance. Moreover, in order to facilitate the harmonised implementation in all Member States, the same GM is proposed for both the Implementing and Delegated Commission Regulations and thus for all organisations within the scope of Part-IS and, to a large extent, for authorities when requirements for authorities and organisations are equivalent.

Updates to the GM are proposed, in particular, to address the following specific issues:

— **Requirements stemming from other regulations**

Clarifications are provided on Directive (EU) 2022/2555 (NIS 2 Directive)⁷ that has repealed the previous NIS Directive (Directive (EU) 2016/1148)⁸ as of 18 October 18 2024 and on the equivalence with cybersecurity requirements under Regulation (EU) 2015/1998.

— **Competent authority**

The non-applicability of the Part-IS.AR requirements to independent entities designated by the State as the competent authority for Part-IS oversight is clarified.

— **Information security management system**

Updated guidance is provided on the ISMS under Part-IS and the concept of interacting safety and information security risk assessment. Reference is made to the ICAO Doc 10204 and the interacting safety and information security ‘bow-ties’.

— **Temporary exemption of certain organisations from the requirement to have an ISMS**

Further guidance is provided regarding the request for temporary exemption (derogation) under IS.I.OR.200(e) / IS.D.OR.200(e).

— **Proportional implementation of an ISMS**

Indicators of complexity are proposed to assess those aspects of the ISMS that would require an appropriate level of effort and detail.

— **Identification of the ISMS scope**

The examples of aviation services have been updated and examples of interfaces between aviation organisations and the data exchanged have been provided.

— **Part-IS provisions mapped to ISO/IEC 27001**

Further guidance is provided for organisations that are already ISO/IEC 27001:2022-compliant and wish to achieve Part-IS compliance, building on the existing ISO/IEC 27001 ISMS.

— **Competence of staff**

- For the assessment of staff competence, references to the EU e-Competence Framework (e-CF) have been added, while references to the NIST CF have been updated to version 2.0.
- Guidance is provided regarding possible roles and their relevant competence in the structure of an organisation compliant with Part-IS. This guidance is based on an adaptation of the EU Cybersecurity Skills Framework published by ENISA.

⁷ Directive (EU) 2022/2555 of the European Parliament and of the Council of 14 December 2022 on measures for a high common level of cybersecurity across the Union, amending Regulation (EU) No 910/2014 and Directive (EU) 2018/1972, and repealing Directive (EU) 2016/1148 (NIS 2 Directive) (OJ L 333, 27.12.2022, p. 80) (<http://data.europa.eu/eli/dir/2022/2555/oj>).

⁸ Directive (EU) 2016/1148 of the European Parliament and of the Council of 6 July 2016 concerning measures for a high common level of security of network and information systems across the Union (OJ L 194, 19.7.2016, p. 1) (<http://data.europa.eu/eli/dir/2016/1148/oj>).

3. What are the expected benefits and drawbacks of the proposed regulatory material

No additional impacts have been identified compared to those created by the regulation and pointed out in Opinion No 03/2021 'Management of information security risks'.

Overall, the provision of AMC and GM is beneficial in supporting the application of the rule.



4. Proposed regulatory material

Based on the above, amendments to the existing GM as well as new GM are proposed as regards:

- the Articles and both the authority requirements (IS.AR.XXX) and organisation requirements (IS.I.OR.XXX) of Commission Implementing Regulation (EU) 2023/203;
- the organisation requirements (IS.D.OR.XXX) of Commission Delegated Regulation (EU) 2022/1645.

It is important to note that the GM to the organisation requirements of Regulation (EU) 2022/1645 is almost identical to the GM to the organisation requirements of Regulation (EU) 2023/203.



5. Monitoring and evaluation

The usefulness of the AMC & GM to Commission Regulations (EU) 2022/1645 and 2023/203 will be monitored through standardisation and oversight activities.



6. Proposed actions to support implementation

Under the implementation support task IST.0001 ‘Supporting the implementation of the IS management system (ISMS) by industry and NCAs’ described in the EPAS for 2023–2025, that has already started, EASA:

- holds dedicated thematic workshops;
- provides support to competent authorities and organisations to develop competence building / training for the implementation of Part-IS and the relevant oversight;
- coordinates with the dedicated TF of volunteer Member States to jointly discuss and solve the challenges linked with Part-IS implementation.



7. References

The following (non-exhaustive) list includes documents that have been considered during the development of this NPA:

- ISO 27000 Series on ‘information security management systems (ISMS)’ standards
- EUROCAE ED-200 Series on ‘information security in aviation’ standards



Appendix — Quality of the NPA

To continuously improve the quality of its documents, EASA welcomes your feedback on the quality of this document with regard to the following aspects:

Please provide your feedback on the quality of this document as part of the other comments you have on this NPA. We invite you to also provide a brief justification, especially when you disagree or strongly disagree, so that we consider this for improvement. Your comments will be considered for internal quality assurance and management purposes only and will not be published.

1. The regulatory proposal is of technically good/high quality

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

2. The text is clear, readable and understandable

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

3. The regulatory proposal is well substantiated

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

4. The regulatory proposal is fit for purpose (achieving the objectives set)

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

5. The regulatory proposal is proportionate to the size of the issue

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

6. The regulatory proposal applies the ‘better regulation’ principles^[1]

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

7. Any other comments on the quality of this document (please specify)

^[1] For information and guidance, see:

- https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how_en
- https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how/better-regulation-guidelines-and-toolbox/better-regulation-toolbox_en