



Explanatory Note to ED Decisions 2025/013/R, 2025/014/R & 2025/015/R

issued in accordance with Article 4(2) of MB Decision No 01-2022

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

RMT.0753 — SUBTASK 1

WHAT THESE DECISIONS ARE ABOUT		
<p>These Decisions issue amendments to the Guidance Material (GM) to the Part-IS regulatory package (Implementing Regulation (EU) 2023/203 and Delegated Regulation (EU) 2022/1645).</p> <p>The objective of the amended GM is to support and facilitate the implementation of the Part-IS regulatory package, thereby maintaining a high level of safety and contributing to the protection of the aviation system against information security (cybersecurity) risks.</p>		
		ED DECISIONS TO BE AMENDED <ul style="list-style-type: none">— 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 <p>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; national competent authorities</p>		
WORKING METHODS		
Development	Impact assessment(s)	Consultation
By EASA	Light	NPA — Focused
RELATED DOCUMENTS / INFORMATION <ul style="list-style-type: none">— ToR RMT.0753 Issue 1, issued on 20.2.2025— NPA 2025-101— Workshop on NPA 2025-101 ‘Regular update of the Acceptable Means of Compliance and Guidance Material to Regulations (EU) 2023/203 and 2022/1645 (Part-IS regulatory package)’		
PLANNING MILESTONES: Refer to the latest edition of the EPAS <i>Volume II</i> .		



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1. About these Decisions

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 TF 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 maintaining high standards of aviation safety throughout the European Union.

The draft regulatory material was consulted in accordance with the ToR for this RMT with the EASA Advisory Bodies (MAB and SAB) through NPA 2025-101⁷ and the focused consultation workshop held on 5 May 2025. EASA reviewed the comments received and duly considered them for the preparation of the regulatory material presented here.

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 \(europa.eu\)](#)

⁷ <https://www.easa.europa.eu/en/document-library/notices-of-proposed-amendment/focused-consultations/npa-2025-101>



2. In summary — why and what

2.1. Why we need to act

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 in the Member States. To this end, these Decisions update the associated GM for the application of both the Implementing and Delegated Commission Regulations, mostly as a result of the joint activity of Member States.

2.2. 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.

2.3. 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 updates 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 provided 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.

The targeted applicability of the regulatory material is aligned with the applicability dates of the implementing and delegated acts of Part-IS.

2.4. What are the stakeholders' views

During the focused consultation, a total number of 206 comments from 19 different stakeholders were received on NPA 2025-101. These were distributed as shown in **Error! Reference source not found..**



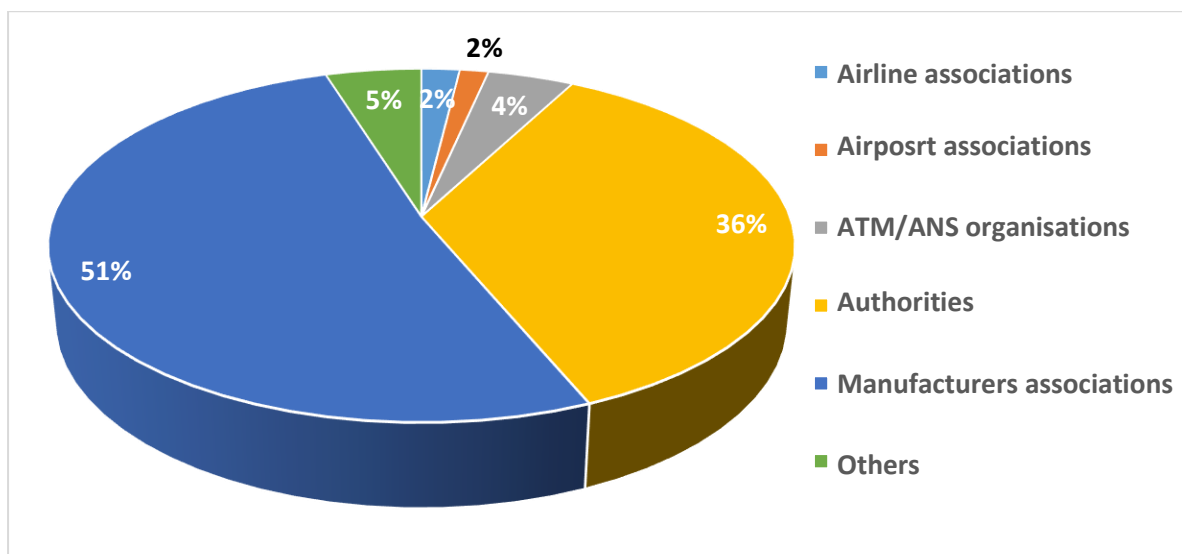


Figure 1: Distribution of comments per stakeholder group

The major comments, related considerations, and how they were addressed by EASA are summarised hereafter. Due to the similarity of the requirements on authorities with those on organisations (both IS.I.OR and IS.D.OR), the comments received in relation to certain topics have been grouped to better highlight the identified areas of interest and to provide an overview of the changes initiated by the comments received. Therefore, changes that were suggested and have been introduced in the GM to the authority requirements (ARs) have been also introduced in the organisation requirements (ORs) when those points were of a general nature.

Error! Reference source not found. 2 shows the distribution of the comments per area.

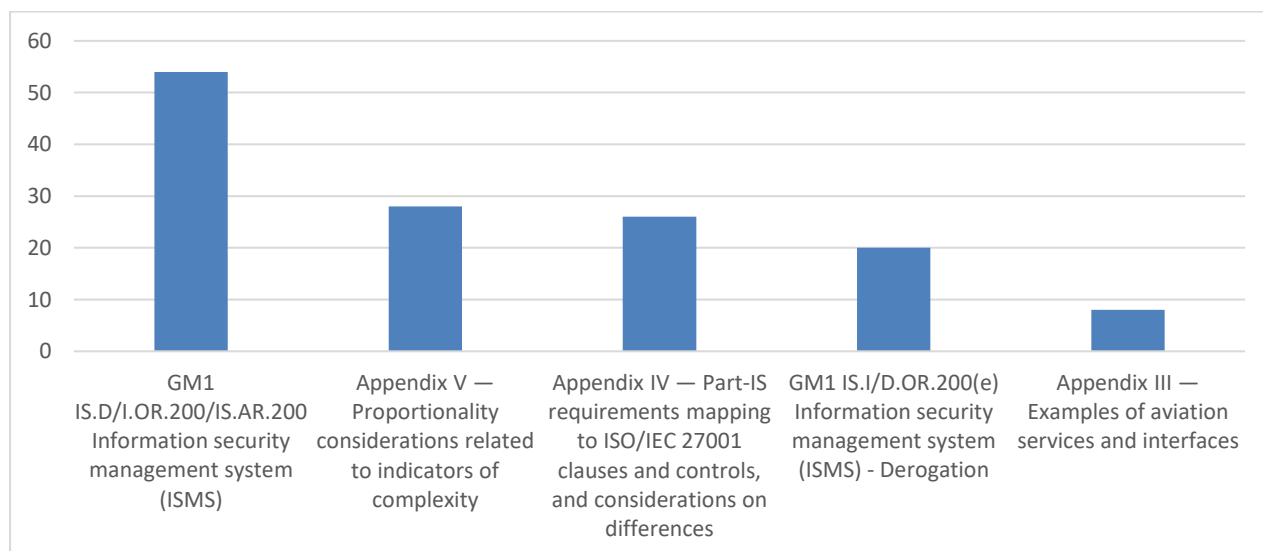


Figure 2: Distribution of comments per area of interest

The comments received resulted in providing further clarifications and corrections of identified inconsistencies. In particular the comments on the further guidance to ‘Information security management system (ISMS) (IS.I/D.OR.200 and IS.AR.200)’ resulted in the inclusion of some further description of the interaction between the safety and the information risk assessment processes.

3. Expected benefits and drawbacks of the regulatory material

The provision of additional GM is beneficial in supporting the implementation of the rules.



4. Monitoring and evaluation

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



5. 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 2025 EPAS Volume II, EASA:

- holds dedicated thematic workshops;
- provides support to national 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.



6. References

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

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

