



EASA Foreign Part-145 – Part-IS Implementation Plan	Doc #	WI.CAO.00186-001
	Approval Date	10/10/2025

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DOCUMENT CONTROL SHEET

Reference documents
a) Procedures
Commission Regulation (EU) 1321/2014 Commission Implementing Regulation (EU) 2023/203 PR.ORG.00001 - Organisation application management PR.ORG.00002 - Organisation approval technical investigation PR.ORG.00003 - Organisation approval audit PR.ORG.00004 - Organisation surveillance PR.ORG.00005 - Non compliance management for organisation approval
b) Internal documents
Applicable documents are listed in the form “FO.CAO.00136 - Foreign Part-145 approvals – Documentation Index” last revision Part-IS TF G-02 - Guidelines Implementation guidelines for Part-IS - IS.I/D.OR.200 (e) Part-IS TF G-03 - Guidelines Part-IS oversight approach

Log of issues		
Issue	Issue date	Change description
001	10/10/2025	First issue.





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0. Introduction





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0.1 Definitions and abbreviations

AMO	Approved Maintenance Organisation
BASA	Bilateral Aviation Safety Agreement
CA	Competent Authority
EASA	European Union Aviation Safety Agency
EU	European Union
IS	Information Security
ISMM	Information Security Management Manual
ISMS	Information Security Management Systems
MOE	Maintenance Organisation Exposition
OMS	Organisation Management Software
TL	Team Leader
TV	Technical Visa





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0.2 Scope and applicability

EASA is the Competent Authority (CA) for Maintenance Organisations having their Principal Place of Business located outside the European Union (Foreign Organisations), as established by to Commission Regulation (EU) 1321/2014 Annex II (Part-145), Section General, 145.1 paragraph 1, and is therefore responsible for the final approval of these Maintenance Organisations and for establishing procedures detailing how EASA Part-145 applications and approvals are managed.

This Work Instruction is applicable to EASA Part-145 applicant and EASA Part-145 AMOs’ (hereafter referred as Maintenance Organisations) having their Principal Place of Business located outside the EU Member States and which are not certified under the provisions of a Bilateral Aviation Safety Agreement (BASA) signed with the EU.

The provisions of this Work Instruction are complementary to the requirements of Commission Regulation (EU) 1321/2014 Annex II (Part-145) “as amended”, Commission Implementing Regulation (EU) 2023/203 “as amended” and do not supersede or replace the associated regulatory requirements.

0.3 Purpose

The purpose of this Work Instruction is to provide a structured approach for EASA Allocated Inspector to oversee the implementation of Information Security Management Systems (ISMS) in Foreign Part-145 Organisations.

IMPORTANT NOTE: The guidance of this Work Instruction is not applicable to EASA Foreign Part-145 Organisations approved under the terms of a Bilateral Aviation Safety Agreement (BASA)

0.4 Additional guidance

Additional guidance is available in form of a Frequently Asked Question (FAQ) on the EASA website at the following link: [When acting as competent authority, what is EASA’s policy for Part-IS oversight while organisations are in the process to achieve the operational Part-IS implementation stage? | EASA.](#)





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1. Part-IS Implementation Plan



**1.1. Application Management**

STEP	WHOM	WHAT	WHEN
1	EASA	<p>Official Letter to be sent to all Foreign Part-145 Organisations asking them to provide:</p> <ul style="list-style-type: none"> • FO.CAO.00155 (Form 2) - available on the EASA website) as per step 2(a) to foreign145@easa.europa.eu mailbox • Remaining Package as per steps 2(b), (c), (d), (e) to their allocated Team Leader 	15 Oct 2025
2	Foreign Part-145 AMOs	<p>Part-IS Application Package containing:</p> <p>(a) FO.CAO.00155 (Form 2) requesting the approval of the nominated persons with reference to implementation of Part-IS / ISMS (→ to foreign145@easa.europa.eu)</p> <p>(b) Resumé of the nominated persons (→ to the TL)</p> <p>(c) Amended MOE as per new MOE User Guide (updated to cover Part-IS), including the procedure for Changes to the ISMS (→ to the TL)</p> <p>(d) An Initial Risk Assessment (→ to the TL) identifying:</p> <ol style="list-style-type: none"> The organisation’s activities, facilities and resources, as well as the services the organisation operates, provides, receives or maintains The equipment, systems, data and information that contribute to the functioning of the elements listed in point (I.) above The interfaces that it has with other organisations, and which could result in the mutual exposure to information security risks The major risks and related threat scenarios, both internal and at the interfaces with other organisations <p>(e) Internal Part-IS Audit with report (→ to the TL) attesting:</p> <ol style="list-style-type: none"> The organisational level of compliance with all the criteria described in the columns <i>ISMM</i> and <i>Audit</i> of the table in point 2.2.1 <i>Step 1: Assessment of Basic ISMS implementation ("Present" and "Suitable")</i> of the <u>Part-IS Oversight Approach Guidelines</u> (from Part-IS Implementation Task Force) Any elements where the <i>“Present”</i> and <i>“Suitable”</i> level has not been reached and the corrective action plan for those elements 	No later than 22 Feb 2026
3	Team Leader	Category Level 2 Finding to be raised if Part-IS Application Package or Part-IS Derogation Package as per WI.CAO.00187 from the organisation not provided within 22 Feb 2026	From 23 Feb 2026





1.2. "Present" and "Suitable" Verification

STEP	WHOM	WHAT	WHEN
4	Team Leader	For the review and approval of MOE, Change Procedure and Nominated Persons:	No later than 31 Dec 2026
		(a) A Simple Change shall be created in the current Surveillance Phase in OMS	
		Once the package is deemed ready for approval, a Desktop Audit shall be created in OMS not earlier than 22 February 2026 , including: <ul style="list-style-type: none"> I. Checklist for Nominated Persons II. Checklist for MOE (including Change Procedure), indicating the MOE paragraphs to be checked (based on the amended MOE User Guide) <ul style="list-style-type: none"> • To support the review of the MOE (and Change Procedure) the Team Leader will use the column <i>ISMM</i> of the table in point 2.2.1 Step 1: <i>Assessment of Basic ISMS implementation ("Present" and "Suitable")</i> of the <u>Part-IS Oversight Approach Guidelines</u> (from NAA Task Force) • As additional support information, the Team Leader will use the <i>Risk Assessment</i> and the <i>Internal Part-IS Audit</i> submitted by the organization with the application package (as per steps 2(d) and 2(e) above) 	
		(c) Approval of MOE, Change Procedure and Nominated Persons via Technical Visa (TV)	
		(d) If, following desktop review and corrective action by the Organisation there are still elements in the application package where the "Present" and "Suitable" levels cannot be satisfactorily demonstrated, then the package is not considered ready for approval. A Desktop Audit with Generic Level 2 Finding shall be created in OMS against EASA.145.A.200A. If the review takes place before applicability date, the finding shall be kept on hold and raised only after 22 February 2026 .	



**1.3. “Present”, “Suitable” and “Ready to Start Operating” Verification**

STEP	WHOM	WHAT	WHEN
5	Team Leader	For the Audit of Part-IS Implementation at “ Present ”, “ Suitable ” and “ Ready to Start Operating ” levels:	No later than 31 Dec 2026
		(a) An Audit needs to be performed in the current or next Oversight Cycle , making the largest use possible of already planned activity (especially in case of SMS Audits)	
		(b) The Audit shall include a Checklist with all the points related to Part-IS : <ul style="list-style-type: none"> To support the Audit the Team Leader will use the columns <i>ISMM</i> and <i>Audit</i> of the table in point 2.2.1 Step 1: <i>Assessment of Basic ISMS implementation (“Present” and “Suitable”)</i> of the <u>Part-IS Oversight Approach Guidelines</u> (from Part-IS Implementation Task Force) As additional support information, the Team Leader will use the <i>Risk Assessment</i> and the <i>Internal Part-IS Audit</i> submitted by the organization with the application package (as per steps 2(d) and 2(e) above) 	
		(c) Remote Audits might be considered on case-by-case basis, when timeline doesn’t allow for Onsite Audits before 31 Dec 2026	
		(d) Finding shall be raised in the Audit Checklist as part of 5(b) and 5(c): <ol style="list-style-type: none"> Category Level 2 Finding if an element is not meeting “Present” and “Suitable” after 22 Feb 2026 	
		(e) Approval will be part of the Recommendation at the end of the Oversight Cycle	



**1.4. “Present”, “Suitable” and “Operational” Verification****IMPORTANT NOTE:**

The development phase for Part-IS Implementation ends **18 months after applicability date**, i.e. 22 Feb 2026 + 18 months = **22 Aug 2027**.

- If the Audit takes place **before 22 Aug 2027**, apply **item 6 below**.
- If the Audit takes place **after 22 Aug 2027**, apply **item 7 below**

STEP	WHOM	WHAT	WHEN
6	Team Leader	For the Audit of Part-IS Implementation at “Present” , “Suitable” and “Operational” levels:	After 31 Dec 2026 and no later than 22 Aug 2027
		(a) Onsite Audit activity using Checklist for “Operational” and “Effective” (TBD by Part-IS Implementation Task Force)	
		(b) Finding or Observations shall be raised in the onsite Audit Checklist: <ol style="list-style-type: none"> I. Category Level 2 Finding if an element is not meeting “Present” and “Suitable” after 22 Feb 2026 II. Category Level 3 Observation if an element is not meeting “Operational” after 31 Dec 2026 	
7	Team Leader	For the Audit of Part-IS Implementation at “Present” , “Suitable” and “Operational” levels:	After 22 Aug 2027
		(a) Onsite Audit activity using Checklist for “Operational” and “Effective” (TBD by Part-IS Implementation Task Force)	
		(b) Finding shall be raised in the onsite Audit Checklist: <ol style="list-style-type: none"> I. Category Level 2 Finding if an element is not meeting “Present”, “Suitable” and “Operational” 	

