



## EASA Foreign Part-145 – Part-IS Derogation Management

### WI.CAO.00187-002

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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.
002	07/11/2025	Minor typos corrections and alignment with OMS workflow.





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## 0. Introduction





Table of Contents

0. Introduction ..... 3

    0.1 Definitions and abbreviations ..... 5

    0.2 Scope and applicability ..... 6

    0.3 Purpose ..... 6

    0.4 Additional guidance ..... 6

1. Part-IS Derogation Management ..... 7

    1.1. Application Management ..... 8

    1.2. Derogation Assessment ..... 9

    1.3. Positive Assessment ..... 10

    1.4. Negative Assessment ..... 10





**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





### 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 assess and approve or reject derogation requests to the Part-IS Regulation made by 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: <https://www.easa.europa.eu/en/the-agency/faqs/information-security-part#category-derogation>.





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## 1. Part-IS Derogation Management



**1.1. Application Management**

STEP	WHOM	WHAT	WHEN
1	EASA	<b>Official Letter</b> to be sent to all Foreign Part-145 Organisations asking them to provide: <ul style="list-style-type: none"> <li>• <b>FO.ORG.00030</b> (available on the EASA website) as per step 2(a) to <a href="mailto:applicant.services@easa.europa.eu">applicant.services@easa.europa.eu</a> mailbox</li> <li>• <b>Remaining Package</b> as per steps 2(b) to their allocated Team Leader and to <a href="mailto:MOC_145@easa.europa.eu">MOC_145@easa.europa.eu</a> mailbox</li> </ul>	15 Oct 2025
2	Foreign Part-145 AMOs	<b>Part-IS Derogation Package</b> containing: <ol style="list-style-type: none"> <li>(a) <b>FO.ORG.00030</b> applying for <b>Derogation from Part-IS</b> (→ to <a href="mailto:applicant.services@easa.europa.eu">applicant.services@easa.europa.eu</a>)</li> <li>(b) All the <b>info and attachments listed under 3.1 of FO.ORG.00030</b> (→ to the TL and to <a href="mailto:MOC_145@easa.europa.eu">MOC_145@easa.europa.eu</a>), i.e.: <ol style="list-style-type: none"> <li>I. Affected approval(s)</li> <li>II. Detailed justification for the exclusion of the provisions</li> <li>III. Overview of services the organisation provides and receives</li> <li>IV. Architecture overview of information systems used for business operation</li> <li>V. Summary of the initial information security risk assessment aligned with the above architecture</li> <li>VI. Methodology used to perform the information security risk assessment</li> <li>VII. List of people and roles involved in the information security risk assessment process</li> </ol> </li> </ol>	No later than 22 Feb 2026
3	Team Leader	<b>Category Level 2 finding to be raised if Part-IS Derogation Package or Part-IS Application Package as per WI.CAO.00186 from the organisation not provided within 22 Feb 2026</b>	From 23 Feb 2026





1.2. Derogation Assessment

STEP	WHOM	WHAT	WHEN
4	FS.1.4 MOC	<p><b>Assessment of the Part-IS Derogation Package:</b></p> <p>The derogation is granted through an <b>expedite review process</b> if the organisation falls under one or a combination of the following categories:</p> <ul style="list-style-type: none"> <li>I. A2</li> <li>II. A4</li> <li>III. B2</li> <li>IV. C04</li> <li>V. C06 (limited to mechanical components)</li> <li>VI. C10</li> <li>VII. C11</li> <li>(a) VIII. C14 (limited to hydro-mechanical components, excluding full landing gear)</li> <li>IX. C16 (limited to mechanical components)</li> <li>X. C19</li> <li>XI. C20</li> <li>XII. C21</li> </ul> <p>and provides the Risk Assessment listed in 2(b)V. taking into account the “<i>typical examples (not exhaustive) of interfaces and information security risks that may be faced by the Part-145 organisation</i>” bullet lists in UG.CAO.00024 (latest revision), chapter 3A.1</p>	No later than 29 May 2026
	FS.1.4 DMOC FS.1.4 SM Team Leader		
		(b) In all the other cases, the FS.1.4 MOC, the FS.1.4 Deputy MOC, the FS.1.4 Section Manager and the allocated Team Leader shall review the Part-IS Derogation Package in accordance with the provisions outlined in <b>Chapter 6 of Implementation guidelines for Part-IS - IS.I/D.OR.200 (e)</b> (from Part-IS NAA Task Force)	



**1.3. Positive Assessment**

STEP	WHOM	WHAT	WHEN
5	Team Leader	In case of <b>Positive Assessment of the Part-IS Derogation Package</b> :	No later than 29 May 2026
		(a) TL to create a <b>Part-IS Derogation</b> record in the <b>Concession Module</b> in OMS with supporting derogation package uploaded as attachment	
		(b) A <b>Desktop Audit</b> shall be created by the TL in the <b>current Surveillance Phase</b> in OMS <b>not earlier than 22 February 2026</b> , including: <ul style="list-style-type: none"> <li>• Reduced MOE Checklist for Part-IS implementation (including the Derogation re-evaluation procedure in MOE chapter 1.10 and 1.11)</li> <li>• Checklist with all the points related to Part-IS Derogation</li> </ul>	
		(c) <b>Recommendation of Derogation via Technical Visa (TV)</b> . TV to be linked to Concession record covering the Part-IS derogation and the supporting desktop audit.	
6	FS.1.4 MOC	(d) <b>Approval</b> of Technical Visa (TV) for Part-IS Derogation.	

**1.4. Negative Assessment**

STEP	WHOM	WHAT	WHEN
7	Team Leader	In case of <b>Negative Assessment of the Part-IS Derogation Package</b> :	No later than 29 May 2026
		(a) <b>CASE 1 = Organisation found not eligible for Derogation:</b> Organisation to apply the process described in <b>WI.CAO.00186</b>	
		(b) <b>CASE 2 = Organisation is in principle eligible for Derogation but Derogation Package requiring major rework and/or Organisation not responsive:</b> <ul style="list-style-type: none"> <li>• A <b>Desktop Audit</b> with <b>Generic Level 2 Finding</b> shall be created in IFP against EASA.145.A.200A, not earlier than 22 February 2026. <ol style="list-style-type: none"> <li>If the review takes place before applicability date, the finding shall be kept on hold and raised only after <b>22 February 2026</b>.</li> </ol> </li> </ul>	

