European Union Aviation Safety Agency

Opinion No 04/2026

issued in accordance with Article 76(1) of Regulation (EU) 2018/1139

Regular update of Regulation (EU) 2023/2117

Repository of civil-aviation-related information

RMT.0749 (SUBTASKS 2 & 3)

WHAT THIS OPINION IS ABOUT

This Opinion proposes to amend Regulation (EU) 2023/2117 which lays down the necessary rules and detailed requirements for the functioning and management of a repository of civil-aviation-related information.

This Opinion amends:

— Articles 3, 4 and 8 in relation to the use access interface, reference to data analysis and dissemination of information, respectively.

— Article 18 in relation to the date of application of the new group category A2 and group categories B and C; in addition, the date of application for legacy data is postponed to 31 May 2029 and, for non-digitalised data, to 31 May 2031.

— Annex I, by removing and reprioritising a number of information objects. Annex I is also restructured to improve the readability and ensure consistency and alignment with the Regulation (EU) 2018/1139 (the Basic Regulation).

The proposed regulatory material is intended to improve the exchange of civil-aviation-related information between national competent authorities, the Agency and the European Commission and allow for a more effective and realistic application of the Regulation.

REGULATION(S) INTENDED TO BE AMENDED	**ED DECISION(S) TO BE AMENDED/ISSUED**
Regulation (EU) 2023/2117	n/a

AFFECTED STAKEHOLDERS
Member States, European Commission, accident/incident investigation authorities, EASA.

WORKING METHODS

Development	**Impact assessment(s)**	**Consultation**
By EASA	Light	Focused

RELATED DOCUMENTS / INFORMATION

ToR RMT.0749, issued on 20.6.2024
NPA 2025-103 and NPA 2026-102, issued on 7.10.2025 and 23.4.2026, respectively.

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

Contents

1. About this Opinion

1.1. How this regulatory material was developed

The European Union Aviation Safety Agency (EASA) identified an issue (as described in Chapter 2), and after having assessed the impact of the possible intervention actions and having consulted those with the EASA advisory bodies (ABs), identified rulemaking as the necessary intervention action.

This rulemaking activity is included in the 2026 edition of Volume II of the European Plan for Aviation Safety (EPAS)[1] under Rulemaking Task (RMT).0749, Subtask 2 and Subtask 3.

EASA developed the regulatory material in question in line with the Basic Regulation[2] and the Rulemaking Procedure[3], as well as in accordance with the objectives and working methods described in the Terms of Reference (ToR) for this RMT[4].

When developing the regulatory material, EASA received the input and support from the Member States' Advisory Body (MAB) in its capacity as the 'Repository Steering Committee (RSC)'.

This draft regulatory material was consulted with the MAB in accordance with the ToR for this RMT through NPA 2025-103 and NPA 2026-102.

EASA reviewed the comments received on both NPAs and duly considered them for the preparation of the regulatory material presented here.

1.2. The next steps

The Opinion is submitted to the European Commission which, based on the Opinion's content, shall decide whether to adopt the amendments to Regulation (EU) 2023/2117[5] as proposed in the Opinion.

Following the adoption and issuance of this regulation, EASA will issue a decision with the related acceptable means of compliance (AMC) and guidance material (GM) to support the implementation of that regulation. When issuing this decision, EASA will also provide feedback to the commentators and information to the public on who engaged in the process and/or provided comments on the draft

1 European Plan for Aviation Safety (EPAS) 2026 - 15th edition | EASA

2 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).

3 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 (europa.eu)).

4 ToR RMT.0749 - Regular update of Regulation (EU) 2023/2117 (Repository of civil-aviation-related information) | EASA

5 Commission Implementing Regulation (EU) 2023/2117 of 12 October 2023 laying down the necessary rules and detailed requirements for the functioning and management of a repository of information pursuant to Regulation (EU) 2018/1139 of the European Parliament and of the Council (OJ L, 2023/2117, 13.10.2023, http://data.europa.eu/eli/reg_impl/2023/2117/oj).

AMC and GM during the consultation, 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

Since the adoption of Regulation (EU) 2023/2117, the Agency, together with the RSC and the European Commission, identified issues requiring some amendments to its Articles and to its Annex I (List of information objects).

These issues, if they are not solved today, would require disproportionate investments by Member States and the Agency to enable the exchange of information with no added benefit for safety.

2.1.1. Description of the issue

Annex I – List of information objects and priority groups

Various information objects have been identified as not being relevant for exchange through the repository because either the information they bear is considered to bring no added value or they are already exchanged through other means. Some information objects would be very difficult to implement while certain certificates or approvals do not exist. Maintaining these information objects in the repository will require significant investments by the national competent authorities (NCAs) and the Agency which are, because of the lack of added value, considered disproportionate.

In particular, the implementation of the two information objects related to medical data would, in the current circumstances, require a 'medical broker' solution. That solution is considered to be ineffective and too costly, also because of the required information security enhancements in the current system. These objects should be removed pending the agreement on a better solution.

Also, the assigned priority groups for some information objects are not adapted anymore to the current situation nor to the need to provide realistic applicability timelines to ensure that all Member States are able to meet the requirements concerning the information objects in a timely manner.

Annex I – Restructuring

Although the restructuring of Annex I is not an issue per se, the overall structure and content of Annex I could be improved by regrouping the information objects per domain rather than by document type (as it is the case today). In terms of content, clarity has been given on the spelling out of abbreviations to several information objects. Also, the Agency revised the terms used in Annex I and aligned some of them with those used in the applicable regulations.

Article 3, paragraph 4 of Regulation (EU) 2023/2117

The repository is designed to <u>store</u> the data sent by the NCAs. However, it cannot be excluded that in the future, certain data will be exchanged <u>without</u> being stored. This would be the case whenever a medical broker solution (as referred to above) would be required. However, the current wording in Article 3(4) seems to exclude that information — which is exchanged through a broker without being stored — is presented in the user interface.

Article 4 of Regulation (EU) 2023/2117

In accordance with Article 74(1) of the Basic Regulation, the Agency shall establish and manage the repository to 'ensure effective cooperation between the Agency and the national competent authorities concerning the exercise of their tasks relating to certification, oversight and enforcement

under this Regulation.' In order to ensure an effective cooperation, it is considered that the analysis of data in the repository is important for various processes like safety data analysis, standardisation activities, rulemaking, etc. However, the Regulation currently does not include any explicit mandate for the analysis of data.

Note: NPA 2026-102 incorrectly referred to Article 5 paragraph 4 while the correct reference should have been Article 4 paragraph 5.

Article 8 of Regulation (EU) 2023/2117

The current wording of Article 8 is such that interested parties may request the Agency to disseminate information contained in the repository. However, the vast majority of the information objects are copies of certificates issued by the NCAs; hence, it is expected that also the majority of dissemination requests are related to certificates which are not issued by the Agency. In accordance with Article 4(4) of Regulation (EC) No 1049/2001[6], the Agency would need to consult the Member States (unless it is clear that the document shall or shall not be disclosed).

The second subparagraph of Article 74(6) of the Basic Regulation stipulates that the Commission and the Agency may disseminate the repository's information 'where relevant'. That requirement should be understood to mean that it is relevant for the Agency to disseminate information objects originating from it, namely those issued by the Agency. Conversely, it should not be considered relevant for the Agency to disseminate information objects stored in the repository that were issued by an NCA. In such cases, the NCA is better placed to assess requests for dissemination, since it is not only in possession of the original document, whereas the Agency holds only a copy, but also in a position to assess whether the conditions laid down in Article 8(3) and (4) of Regulation (EU) 2023/2117 are fulfilled.

An amendment of Article 8 would relieve the Agency and the NCAs from the administrative burden, and limit the risk that they both may have different opinions on the validity of the request.

Article 18 of Regulation (EU) 2023/2117

The current application dates in Article 18 do not provide a realistic applicability timeline to ensure that all Member States are able to meet the requirements concerning the information objects in a timely manner. This may have a detrimental effect on the efficient implementation of the Regulation.

***Article 18 of Regulation (EU) 2023/2117* – Legacy data**

It is also recognised that the current time frame to upload the legacy data into the repository is not sufficient in the event that such data is not yet available as digitalised structured data.

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 issues described in Section 2.1.

[6] Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents (OJ L 145, 31.5.2001, p. 43, http://data.europa.eu/eli/reg/2001/1049/oj).

With the regulatory material presented here, EASA intends to ensure that the repository only contains the necessary information objects that can be exchanged, are relevant for the authorised users and bring added value. The information objects should be uploaded to the repository by all involved parties within realistic deadlines and according to a priority system that ensures the effective cooperation between the Agency and the NCAs. By removing from Annex I those information object categories which have no added value, unnecessary costs for the NCAs and EASA are avoided.

EASA also aims at correcting three specific provisions in the Regulation regarding the user access interface, data analysis and dissemination of information, and to improve the structure and content of Annex I.

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

2.3.1. *AMENDMENTS TO REGULATION (EU) 2023/2117*

Amendment to paragraph 4 in Article 3 – Establishment of the repository

Paragraph 4 of Article 3 is amended:

'The User Access interface referred to in paragraph 1 shall provide for an online and secure query and read access to the *exchanged information*. (…)' instead of '….the stored information'.

New paragraph 5 in Article 4 – Management of the repository

A new paragraph 5 is added to Article 4:

'The Agency may analyse the information in the repository to support the tasks of the Agency and the national competent authorities relating to certification, oversight and enforcement.'

Amendment to Article 8 – Arrangements for the dissemination of information

Article 8 is amended to leverage the wording of the Basic Regulation 'where relevant' in Article 74(6) second subparagraph, and to interpret it such that it is only relevant for the Agency to disseminate information that originates from it. This amendment uses the concept of 'competent authority', indirectly requiring the applicant to lodge the request with the competent authority.

Consequential amendments to Article 8

A recital is added:

'As the competent authority responsible for issuing an information object stored in the repository has the best knowledge of that information object, the responsibility for handling requests from interested parties concerning such information objects should lie with that competent authority'.

Amendment to Article 2 – Definitions

A new definition is added:

(h) 'competent authority' means either the Agency or the national competent authority designated by a Member State, which has issued the information object included in the repository, in accordance with Article 62(4) of Regulation (EU) 2018/1139 regarding the performance of tasks related to certification, oversight and enforcement.

Article 18 — New applicability dates for the priority groups

In Article 18, paragraph 3 is amended as follows:

'3. The requirements concerning information objects issued after the entry into force of this Regulation shall be applicable:

(a) as of 1 January 2027 for Annex I, group A1 category;

(b) as of 1 January 2028 for Annex I, group A2 category;

(c) as of 1 October 2028 for Annex I, group B category;

(d) as of 31 May 2029 for Annex I, group C category.'

Article 18 – Legacy data

Article 18, paragraph 4 is amended as follows:

'4. The requirements concerning information objects listed in Annex I, which are valid and issued before the entry into force of this Regulation, shall be applicable as of 31 May 2029. However, if information objects are not yet available as digitalised structured data, the requirements shall be applicable as of 31 May 2031.'

2.3.2. *AMENDMENTS TO ANNEX I TO REGULATION (EU) 2023/2117*

List of information objects

16 information objects are removed from Annex I:

— Aerodrome equipment certificate

— ATM/ANS systems and ATM/ANS constituents – Statement of compliance

— Decision of a Member State on the designation of a single common information service provider

— Permit to fly

— Permit to fly – approval of flight conditions

— Declaration as provider of training for UAS operators

— Cabin crew medical report

— Maintenance Review Board (MRB) Report approval

— Theoretical knowledge examinations (ECQB)

— Airworthiness directives (ADs), Safety directives, Safety Information Bulletins (SIBs)

— Draft recommendations for reply to ICAO State Letters

— Recommendations for reply to ICAO State Letters

— Alternative means of compliance requests

— Application form for pilot medical certificate

— Pilot medical examination forms and supporting medical certificates

— Maintenance organisation approvals (MOA) – Part M Subpart F EASA Form 3-MF

Consequential amendments following the removal of the two medical objects

To underline that the removal of the 'Application form for pilot medical certificate' and the 'Pilot medical examination forms and supporting medical certificates' from Annex I is a temporary measure until a better implementation solution has been agreed, a recital is added:

'The removal from Annex I of the information object categories 'Application form for pilot medical certificate' and 'Pilot medical examination forms and supporting medical certificates' should be understood as a transitional measure, pending the development of an appropriate technical and legal solution to address the specific challenges posed by the exchange of sensitive personal health data through the repository. Once an adequate solution has been identified that addresses those constraints in a secure, effective and legally-compliant manner, the reincorporation of those information object categories into Annex I should be envisaged, with a view to enabling the exchange of medical data in support of effective cooperation between the Agency and the national competent authorities in the exercise of their tasks relating to certification, oversight and enforcement under Regulation (EU) 2018/1139.'

Restructuring of Annex I

The new headings of Annex I group the information objects per domain rather than document type. Annex I now contains the following information objects headings:

— Initial airworthiness;

— Continuing airworthiness;

— Aircrew;

— Aeromedical;

— Air operations;

— Aerodromes;

— ATM/ANS and U-space;

— UAS;

— Scope of the Basic Regulation;

— Joint certification, oversight and enforcement system;

— Others.

Several terms are also aligned with the terminology used in the applicable regulations:

— 'Language proficiency assessment center certificate' is changed to 'Language testing body approval'.

— The 'Common Information Service Provider certificate' is renamed 'Single common information service provider certificate (SCISP)' as certificates are only issued to the SCISPs. At the same time, the abbreviation 'SCISP' has been added.

— 'Notifications of FTL schemes' is changed to 'Notifications of individual flight time specification scheme (IFTSS)' to align with the Basic Regulation and the related object.

— ‘Proposal of Individual Flight Time Specification Scheme (IFTSS)’ is changed to ‘Opinion on individual flight time specification scheme (IFTSS)’ as this is the wording used in the Basic Regulation.

Some errors are also corrected:

— ‘Aerodrome operator certificate’ is replaced with ‘Aerodrome equipment certificate’, the latter being the information object’ to be removed from Annex I.

Also, some minor/editorial amendments are introduced:

— Relevant abbreviations are introduced;

— Merging the certificates for pilot aero-medical examiners and ATCO aero-medical examiners into the existing ‘Aeromedical examiner certificate’ (by deleting the ‘Air traffic controller (ATCO) aero-medical examiner certificate’).

Priority groups

The current category group A is divided in two subgroups: A1 and A2. Consequently, some information objects are subject to changes in the priority, specifically those that have been assigned to the new A2 category.

Annex I to Regulation (EU) 2023/2117 currently includes three different priority groups for the information object categories A, B and C, for which the requirements should be applicable at different dates. Moreover, the additional A1 subgroup has been created.

Targeted applicability of the regulatory material

The implementing act is expected to be adopted in Q4 2026. No transition period or deferred applicability date is provided for.

Legal basis

The legal basis for amending Regulation (EU) 2023/2117 is Article 74(8) of the Basic Regulation.

2.4. Stakeholders’ views

The MAB, in its capacity as the RSC, was consulted on NPA 2025-103 and on NPA 2026-102.

NPA 2025-103

A total of seven comments were submitted by two Member States. Overall, the comments were supportive of all the proposed changes regarding:

— the priority group for certain information objects, including those related to medical data (now superseded by NPA 2026-102 that proposed to remove them from Annex I).

— the revised applicability dates.

In addition, one Member State suggested to completely restructure Annex I as the information objects do not always correspond to the category in which they are placed. Equivalent certificates also appear in several categories.

NPA 2026-102

19 comments were received from seven Member States. Overall, the RSC agrees with the proposal to simplify the requirements and to make Annex I as proportionate as possible. The comments were supportive of the proposed changes regarding:

— the removal of the proposed information objects in Annex I;

— the amendments to Articles 3, 4 and 8 of Regulation (EU) 2023/2117;

— the removal of the two medical objects (pending the development to address the known issues). In relation to that proposal, one Member State requested to add a recital to clearly reflect that the deletion is a transitional measure, pending the development of an adequate solution for sensitive medical data, and that reincorporation is envisaged once that solution is in place.

A single Member State challenged the need to change Article 8 as they prefer a centralised approach to the dissemination requests.

The Agency seeked for the advice of the MAB on the draft opinion. Four Member States responded, mainly to confirm their agreement with the content. There were no substantially divergent views amongst the responses.

2.5. Other relevant information

This Opinion is based on NPA 2025-103 (RMT.0479, Subtask 2) and NPA 2026-102 (RMT.0479, Subtask 3).

3. Expected benefits and drawbacks of the proposed regulatory material

The Agency's assessment is that overall there will be benefits as Member States and EASA will be allowed more time to implement the requirements. The removal of information objects that:

— provide no added value,

— are already exchanged through other means,

— do not exist, or

— would be disproportionate to implement

simplify the requirements while maintaining a proportionate regulatory approach. Also, postponing the implementation of the medical information objects until a secure and proportionate solution is available avoids unnecessary administrative and IT-related burden without immediate corresponding added value for authorised users.

The impact assessment conducted regarding the amendments proposed by NPA 2026-102 shows that while there is no impact on safety, doing nothing (maintain the regulation has it is today) would lead to a total cost for the NCAs and EASA of €4M over a period of five years.

The proposed changes contribute to rule simplification, notably through the cost savings that would be realised for both competent authorities and EASA.

The restructuring of Annex I also brings benefits to stakeholders as it ensures regulatory consistency and alignment with other relevant regulations and the Basic Regulation. It also supports stakeholders in the implementation of the requirements.

The proposed regulatory material has been developed in view of the better regulation principles, and in particular the regulatory fitness principles.

4. Proposed regulatory material

The regulatory material is proposed in the Annex to this opinion.

In addition to the draft Regulation, this chapter shows all the amendments to the relevant provisions for a better traceability of the proposed changes.

NOTE: This chapter contains two tables reflecting Annex I to Regulation 2023/2117: TABLE 1 reflects the Annex as amended by this Opinion for traceability purposes. TABLE 2 shows the full and clean version of TABLE 1, but now restructured (new grouping per domain). TABLE 2 will be included in the amending Regulation.

4.1. TABLE 1 - ANNEX I (as amended)

LIST OF INFORMATION OBJECTS

Information object	Priority groups
Licences	
Pilot licence	A2
Pilot licence validation	A2
Air traffic controller licence	A2
Aircraft maintenance licence (AML)	B
[…]	
Certificates – Organisations	
[…]	
~~Aerodrome equipment certificate~~	~~B~~
Light UAS operator certificate (LUC)	A1
Single common information service provider (SCISP) certificate	B
[…]	
Certificates – Personnel	
[…]	
Examiner certificate	A2
Instructor certificate	A2
Language ~~proficiency assessment~~ testing ~~center~~ body ~~certificate~~ approval	C
[…]	
Certificates – Products/Equipment	
[…]	
Type certificate data sheet (TCDS)	C
[…]	

Certificates – Medical	
Aero-medical examiner certificate	A2
Aero-medical centres (AeMC) certificate	A2
~~Air traffic controller (ATCO) aeromedical examiner certificate~~	~~A~~
Air traffic controller (ATCO) medical certificate	A2
~~Application form for pilot medical certificate~~	~~A~~
~~Pilot medical examination forms and supporting medical certificates~~	~~A~~
Pilot medical certificate	A2
Declarations	
[…]	
~~ATM/ANS systems and ATM/ANS constituents – Statement of compliance~~	~~B~~
~~Declaration as provider of training for UAS operators~~	~~C~~
UAS operational declaration STS	A1
Attestations and reports	
[…]	[…]
~~Cabin crew medical report~~	~~C~~
[…]	
Exemptions	
[…]	
Exemption from holding ATM/ANS certificate as provider - recommendation	C
Approvals	
~~Permit to fly – approval of flight conditions~~	~~C~~
~~Permit to fly~~	~~C~~
~~Maintenance Review Board (MRB) Report approval~~	~~C~~
~~Theoretical knowledge examinations (ECQB)~~	~~C~~
[…]	[…]
~~Maintenance Organisation approvals (MOA) – Part M Subpart F EASA Form 3-MF~~	~~B~~
[…]	
Design or production of ATM/ANS equipment (DPO) approval	B
[…]	
~~Declared~~ Ttraining organisation (DTO) declaration ~~for~~ (Pilot)	C
[…]	[…]
Decisions	
[…]	

Proposal for Implementing Act/Delegated Act amendment - decision	C
[…]	
~~Proposal of~~ Opinion on individual flight time specification scheme (IFTSS)	C
Notifications of individual flight time specification scheme (IFTSS) ~~FTL schemes~~	C
Registration of UAS operator	A1
~~Decision of a Member State on the designation of a single common information service provider~~	~~B~~
[…]	
Measures	
[…]	
Opt-in ~~(Art. 2(6))~~ to apply specific provisions of Basic Regulation for listed activities (notification)	C
[…]	
Others	
[…]	
Deviation for an ~~to~~ ETSO approval	C
Proposal for Implementing Act/Delegated Act amendment – recommendation	B
~~Airworthiness directives (AD), Safety directives, Safety Information Bulletins (SIB)~~	~~C~~
~~Draft recommendations for reply to ICAO State Letters~~	~~C~~
[…]	[…]
~~Recommendations for reply to ICAO State Letters~~	~~C~~
~~Alternative Means of Compliance requests~~	~~C~~
[…]	
Operational authorisation for UAS operators	A1
[…]	

4.2. TABLE 2 - ANNEX I (Restructured, as proposed in the amending regulation)

LIST OF INFORMATION OBJECTS

Information object	Priority groups
Initial airworthiness	
Design organisation approval (DOA)	B
Alternative procedure to design organisation approval (APDOA)	C

Production organisation approval (POA)	B
Letter of agreement for production without production organisation approval	C
Type-certificate (TC)	B
Type certificate data sheet (TCDS)	C
European technical standard order authorisation (ETSOA)	C
Deviation for an ETSO approval	C
Restricted type-certificate (RTC)	B
Supplemental type-certificate (STC)	B
Noise certificate	C
Restricted noise certificate	C
Major/Minor changes approval	C
Major/Minor repair design approval	C
Continuing airworthiness	
Aircraft maintenance licence (AML)	B
Combined airworthiness organisation approval (CAOA) – Part-CAO	B
Continuing airworthiness management organisation approval (CAMOA)	B
Maintenance organisation approval (MOA) – Part-145	B
Maintenance training organisation approval (MTOA) – Part-147	B
Certificate of airworthiness (CofA)	B
Restricted certificate of airworthiness (RCofA)	C
Airworthiness review certificate (ARC)	C
Aircrew	
Pilot licence	A2
Training organisation (ATO) approval (Pilot)	C
Training organisation (DTO) declaration (Pilot)	C
Flight simulation training device (FSTD) qualification certificate	C
Language testing body approval	C

Pilot licence validation	A2
Examiner certificate	A2
Instructor certificate	A2
Cabin crew attestation	C
Cabin crew training organisation (CCTO) approval	C
Aero-medical	
Pilot medical certificate	A2
Air traffic controller (ATCO) medical certificate	A2
Aero-medical examiner certificate	A2
Aero-medical centre (AeMC) certificate	A2
Air operations	
Air operator certificate (AOC)	B
Air operator – operations specifications	C
Third-country operator's (TCO) authorisation	B
High-risk commercial specialised operation – authorisation	B
Ramp inspection training organisation (RITO) approval	B
NCC and SPO declarations of aircraft operators	C
Aerodromes	
Aerodrome operator certificate	B
Provider of apron management service declaration	B
Ground handling provider declaration	B
ATM/ANS and U-Space	
Air traffic controller licence	A2
Air traffic controller (ATCO) training organisations	B
ATM/ANS provider certificate	B
Provider of flight information services (FIS) declaration	B
U-space service provider (USSP) certificate	B

Single common information service provider (SCISP) certificate	B
Exemption from holding ATM/ANS certificate as provider – notification	C
Exemption from holding ATM/ANS certificate as provider – recommendation	C
Exemption from holding ATM/ANS certificate as provider – decision	C
Design or production of ATM/ANS equipment (DPO) approval	B
ATM/ANS systems and ATM/ANS constituents – declaration	B
ATM/ANS systems and ATM/ANS constituents – certificate	B
UAS	
Certificate of remote pilot theoretical training	C
Operational authorisation for UAS operators	A1
Light UAS operator certificate (LUC)	A1
UAS operational declaration STS	A1
Registration of UAS operator	A1
Registration of certified UAS	B
Scope of the Basic Regulation	
Decision to exempt from provisions of the Basic Regulation for aerodromes	C
Opt-in to apply specific provisions of the Basic Regulation for listed activities (notification)	C
Opt-in to apply specific provisions of the Basic Regulation for listed activities (recommendation)	C
Opt-in to apply specific provisions of the Basic Regulation for listed activities (decision)	C
Opt-out to exempt categories of aircraft from specific provisions of the Basic Regulation	C
Joint certification, oversight and enforcement system	
Accreditation as a qualified entity	C
Joint responsibility for tasks relating to aircraft operators involved in commercial air transport	C

List of Member States and organisations having transferred responsibilities, reallocated task (in accordance with Articles 64 and 65 of the Basic Regulation) and competent authority responsible after reallocation	C
Invalidation and recognition of certificates or declarations	C
Immediate measure taken in reaction to a serious safety problem (notification)	B
Immediate measure taken in reaction to a serious safety problem (recommendation)	B
Immediate measure taken in reaction to a serious safety problem (decision)	B
Exemption (cumulative) duration up to eight months – notification	B
Exemption (cumulative) duration above eight months – notification	B
Exemption (cumulative) duration above eight months – recommendation	B
Exemption (cumulative) duration above eight months – decision	B
Proposal for Implementing Act/Delegated Act amendment – notification	B
Proposal for Implementing Act/Delegated Act amendment – recommendation	B
Proposal for Implementing Act/Delegated Act amendment – decision	C
Others	
Notification of individual flight time specification scheme (IFTSS)	C
Opinion on individual flight time specification scheme (IFTSS)	C
Conflict zones information bulletin (CZIB) – measures	B
ICAO Standards and Recommended Practices (SARPs) – compliance checklist	C

4.3. A recital is added to the amending Regulation in relation to the removal of the medical certificates and forms in Annex I, as suggested by one of the Member States:

'The removal from Annex I of the information object categories 'Application form for pilot medical certificate' and 'Pilot medical examination forms and supporting medical certificates' should be understood as a transitional measure, pending the development of an appropriate technical and legal solution to address the specific challenges posed by the exchange of sensitive personal health data through the repository. Once an adequate solution has been identified that addresses those constraints in a secure, effective and legally-compliant manner, the reincorporation of those information object categories into Annex I should be envisaged, with a view to enabling the exchange of medical data in support of effective cooperation between the Agency and the national competent authorities in the exercise of their tasks relating to certification, oversight and enforcement under Regulation (EU) 2018/1139.'

4.4. A recital is added to the amending Regulation in relation to the amendment to Article 8:

'As the competent authority responsible for issuing an information object stored in the repository has the best knowledge of that information object, the responsibility for handling requests from interested parties concerning such information objects should lie with that competent authority.'

4.5. A new definition is added in Article 2 of Regulation (EU) 2023/2117:

(g) […]

(h) 'competent authority' means either the Agency or the national competent authority designated by a Member State, which has issued the information object included in the repository, in accordance with Article 62(4) of Regulation (EU) 2018/1139 regarding the performance of tasks related to certification, oversight and enforcement.

4.6. Paragraph 4 of Article 3 of Regulation (EU) 2023/2117 is amended as follows:

3. […]

4. The User Access interface referred to in paragraph 1 shall provide for an online and secure query and read access to the ~~stored~~ exchanged information. […]

5. […]

4.7. A new paragraph 5 is added to Article 4 of Regulation (EU) 2023/2117:

4. […]

5. The Agency may analyse the information in the repository to support the tasks of the Agency and the national competent authorities relating to certification, oversight and enforcement.

4.8. Article 8 of Regulation (EU) 2023/2117 is amended as follows:

1. The ~~Agency~~ competent authority may, upon request of an interested party, provide such interested party with the information contained in the repository subject to the specific conditions of use set out in this Article. The interested parties shall address their request to the competent authority responsible for issuing the information object included in the repository.

If the competent authority receives a request for an information object included in the repository, for which another competent authority is responsible, it shall refer the request without undue delay to that competent authority. If the interested party is unable to identify the authority that issued the information object contained in the repository, it shall submit its request to the Agency.

2. […]

3: When receiving a request, the ~~Agency~~ competent authority shall verify that:

(a) the request is made by an interested party; and

(b) the interested party demonstrates that the requested information is strictly necessary to the interested party's own operations~~.~~,

unless that information has been or is publicly available in accordance with Regulation (EU) 2018/1139.

4: The ~~Agency~~ competent authority shall evaluate whether the request is justified and if the conditions laid down in paragraph 5 are met, it shall provide the interested party with the information requested.

5: The ~~Agency~~ competent authority shall provide the requested information to the interested party only under the following conditions:

(a) the interested party does not receive access to the entire content of the repository;

(b) the information is strictly necessary for the interested party's own operations;

(c) no personal data is disseminated unless such data concerns the interested party itself or if such dissemination is strictly necessary to perform the operations of the interested party.

~~6. The Agency shall make available to the authorised users an updated list of requests received and action taken by the Agency.~~

~~7~~ 6. The interested party shall:

(a) use the information only for the purpose specified in the request form;

(b) not disclose the information received without the authorisation of the authorised users;

(c) take the necessary measures to ensure the confidentiality of the information received.

***4.9. Article 18* - Entry into force and application is amended as follows:**

1. […]

2. […]

3. The requirements concerning information objects issued after the entry into force of this Regulation shall be applicable:

(a) as of 1 January 2027 for Annex I, group A1 category;

(b) as of 1 January 2028 for Annex I, group A2 category;

(c) as of 1 ~~January~~ October 2028 for Annex I, group B category;

(d) as of ~~1 January~~ 31 May 2029 for Annex I, group C category.

4. The requirements concerning information objects listed in Annex I, which are valid and issued before the entry into force of this Regulation ~~listed in Annex I~~, shall be applicable as of ~~from~~ 31 ~~January~~ May 2029. However, where information objects are not yet available as digitalised structured data, the requirements shall be applicable as of 31 May 2031.

5. Monitoring and evaluation

No specific monitoring or evaluation of the proposed amendments is envisaged.

6. Actions to support implementation

No specific action to support the implementation of the proposed amendments is envisaged.

7. References

n/a