European Union Aviation Safety Agency

FAQ n.139292

FAQs:

Applicability, Information Security (Part-IS)

Question:

As the 'Authority Requirements' are part of Implementing Regulation (EU) 2023/203, which is applicable from 22 February 2026, does this mean that the applicability date (16 October 2025) of Delegated Regulation (EU) 2022/1645 can be then disregarded?

Answer:

Regulatory deadlines cannot be disregarded. Therefore, organisations within the scope of Delegated Regulation (EU) 2022/1645 have to comply with it by 16 October 2025. However, as the Authority Requirements will only be applicable as of 22 February 2026, it is possible that before that date Competent Aviation Authorities (CAAs) might not be fully in compliance with the Authority Requirements. National Aviation Authorities (NAAs) have nevertheless to enforce the Delegated Regulation during the four months between the two applicability dates as an oversight obligation stemming from Article 62 of the Basic Regulation. However, a lenient approach is advised to be followed until the Implementing Regulation becomes applicable.
More information on guidelines on the oversight approach by the authorities

At the same time, we would recommend that all affected parties, authorities, and organisations integrate Part-IS into their processes as early as possible, as the objective is to ensure adequate protection of the aviation ecosystem and not merely compliance.

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Link:

https://www.easa.europa.eu/en/faq/139292