

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 entirely 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’ (of Implementing Regulation (EU) 2023/203) will only be applicable as of 22 February 2026, it is possible that before that date, National Aviation Authorities (NAAs) might not be fully compliant with those Authority Requirements. NAAs must nevertheless enforce the Delegated Regulation during the four months between the two applicability dates as an oversight obligation stemming from Article 62 of Regulation (EU) 2018/1139 (the ‘Basic Regulation’). However, a lenient approach is advised to be followed until the Implementing Regulation becomes applicable.

At the same time, we would recommend that all affected parties, i.e. authorities and organisations, incorporate 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/mt/faq/139292>