

## 1.0 Applicability

This Notice is applicable to ATOs, AeMCs, FSTD Operations (as per Commission Regulation 1178/2011) and ATCO TOs (as per Commission Regulation 2015/340).

## 2.0 Introduction

Part-IS - Commission Implementing Regulation EU 2023/203 establishes rules for managing information security risks in aviation. It requires aviation organisations to implement an Information Security Management System (ISMS) to protect safety-critical information. The regulation applies to a wide range of aviation organisations, including operators, maintenance and training organisations, aero-medical centres, FSTD operators, and air navigation service providers. Its aim is to enhance aviation resilience against cyber threats, with full compliance required by 22 February 2026.

## 3.0 Application for ISMS

Organisations are advised to submit their ISMS approval applications at least four months before the 22 February 2026 compliance deadline. This allows sufficient time for TMCAD to review, assess and address any queries. If applications arrive late and the TMCAD has not had adequate time to complete the review by the due date, a finding shall be issued at the compliance deadline. Timely submission is therefore essential to ensure a smooth approval process and avoid non-compliance issues.

**Note:** *If organisations are unsure whether they fall under the scope of this regulation, they should contact their principal inspector for clarification. Nevertheless, even if they consider themselves non-applicable, they should still inform TMCAD to confirm their status and ensure full understanding of the regulation. Furthermore, organisations seeking to be considered for derogation must also contact their principal inspector.*

### 3.1 Submission of Documents

All required documents for ISMS approval must be submitted electronically through the Centrik portal. The following key documents must be included:

- Management of Change
- Common Responsible Person application (if applicable)
- ISMM (Information Security Management Manual)
- Risk Assessment related to Part-IS elements
- Training needs analysis and training certificates
- Manpower plan
- Amended audit Plan
- Internal audit checklist(s) covering Part-IS
- Contracts with contracted activities related to Part-IS
- Data retention policy
- Sample of annex to contracts (or other) including assigned roles and the associated information security responsibilities
- Completed TMCAD Checklists

Proper and complete submission of these documents is essential for the timely review and approval process.

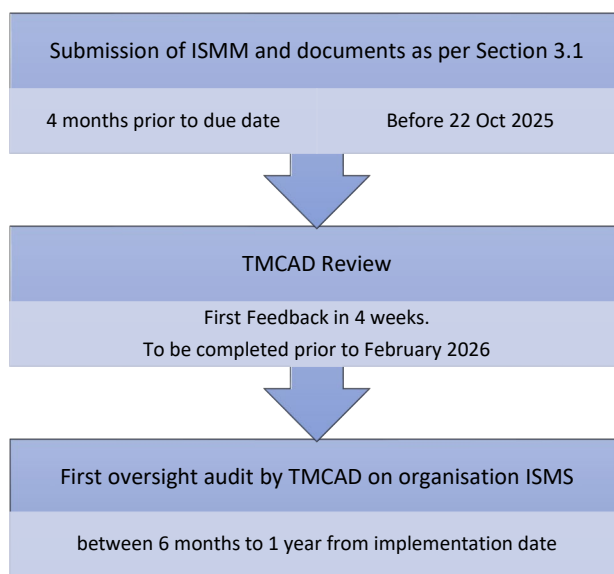
**Note:** For those organisations that hold more than one approval, kindly speak to your principal inspectors so that they can guide you to which unit at TMCAD you should submit the application. For example, if your organisation holds an ATO approval and AOC or if your organisation holds an FSTD Operator approval and an AOC.

#### 4.0 Assessment of Submission

Upon receipt, all submitted documents will be reviewed and assessed by the TMCAD to ensure compliance with Part-IS requirements. The assessment will focus on verifying that the organisation's ISMS documentation, risk management, training, and audit processes meet the regulatory standards. Any gaps or issues identified during the review will be communicated to the organisation for corrective action.

Organisations can expect initial feedback within 4 weeks of submission.

#### 5.0 Timelines



Organisations are encouraged to adhere to these dates to ensure timely processing and avoid findings related to late submissions. Early engagement with TMCAD is advised to address any potential issues promptly.

#### 6.0 References

- FAQs and links EASA: <https://www.easa.europa.eu/en/the-agency/faqs/information-security-part>
- Regulation EASA: <https://www.easa.europa.eu/en/document-library/easy-access-rules/easy-access-rules-information-security-regulations-eu-2023203>
- ICAO page on cyber security: <https://www.icao.int/aviationcybersecurity/Pages/default.aspx>
- Guidelines for ISO/IEC 27001:2022 conforming organisations on how to show compliance with Part-IS: <https://www.easa.europa.eu/community/topics/part-implementation-task-force-deliverables>
- Implementation guidelines for Part-IS - IS.I/D.OR.200 (e): <https://www.easa.europa.eu/community/topics/part-implementation-task-force-deliverables>
- Part-IS Oversight Approach Guidelines: <https://www.easa.europa.eu/community/topics/part-implementation-task-force-deliverables>
- Relevant EUROCAE, NIST and ISO Documents

#### 7.0 Support and Contact Information

For any queries you may contact the Head of Personnel Licensing by email [rachel.c.grech@transport.gov.mt](mailto:rachel.c.grech@transport.gov.mt) or telephone +356 2555 5611.