

## Aircrew training and licensing - Restrictive measures Russia

### *Disclaimer:*

*The information included in the frequently asked questions (FAQs) has been coordinated with relevant services of the EU Commission and intends to help and give guidance to national authorities, EU operators and citizens for the implementation of Council Regulation (EU) No 833/2014 and Council Regulation (EU) No 269/2014. The FAQs do not have binding effect. Under the EU Treaties, Member States are responsible for implementing EU law in their national legal system. In case of individual matters, please contact your competent authority.*

### **What actions has EASA taken in the domain of pilot licensing?**

#### **Answer**

EASA has suspended all flight simulation training device (FSTD) qualification certificates issued by EASA to organisations in Russia.

#### **Last updated:**

15/03/2022

#### **Link:**

<https://www.easa.europa.eu/de/faq/136176>

**I am an EU national and holder of a pilot licence issued in accordance with Annex I (Part-FCL) to Regulation (EU) No 1178/2011. Am I allowed to fly, either within or outside the European Union, a Russian-owned, -registered or -operated aircraft?**

#### **Answer**

No. The personal scope of Regulation (EU) No 833/2014 includes any person inside or outside the territory of the European Union who is a national of a Member State.

#### **Last updated:**

08/03/2024

**Link:**

<https://www.easa.europa.eu/de/faq/136177>

**As an approved training organisation (ATO) / declared training organisation (DTO) / organisation operating flight simulation training devices (FSTDs) subject to Regulation (EU) No 1178/2011 and my having principal place of business within the EU territory**

**Answer**

Training, testing and checking of Russian citizens is allowed if done for the purpose of operating a non-Russian-registered aircraft that is NOT owned or chartered<sup>(2)</sup>, or otherwise controlled<sup>(1)</sup> by any Russian natural or legal person, entity or body.

If the intention of the applicant is to fly in Russia, at a Russian air carrier or Russian-registered aircraft or any non-Russian-registered aircraft that is owned or chartered, or otherwise controlled by any Russian natural or legal person, entity or body, then such training, testing or checking is prohibited. Furthermore, the training, testing or checking cannot take place in Russia (c.f. Articles 3c(1) and 3d(1) of Regulation (EU) No 833/2014).

*Note 1: The concept of 'control' is understood in the 'economic' or 'financial' sense and not in the 'technical' or 'operational' sense (cf. para 48 of [Judgement of the General Court Case T-233/22](#)).*

*Note 2: The EU aviation law does not define 'aircraft charter'. Member States authorities should apply the definition of 'charter' in accordance with their national legislation and relevant international agreements.*

**Last updated:**

08/03/2024

**Link:**

<https://www.easa.europa.eu/de/faq/136178>

**I am a holder of an examiner certificate issued in accordance with Annex I (Part-FCL) to Regulation (EU) No 1178/2011. Am I allowed to conduct skill tests, proficiency checks or assessments of competences to Russian license holders or to Russian nationals**

**Answer**

Training, testing and checking of Russian citizens is allowed if done for the purpose of operating a non-Russian-registered aircraft that is NOT owned or chartered<sup>(2)</sup> or otherwise controlled<sup>(1)</sup> by any Russian natural or legal person, entity or body.

If the intention of the applicant is to fly in Russia, at a Russian air carrier or Russian-registered aircraft or any non-Russian-registered aircraft that is owned or chartered or otherwise controlled by any Russian natural or legal person, entity or body, then such training, testing or checking is prohibited. Furthermore, the training, testing or checking cannot take place in Russia (c.f. Articles 3c(1) and 3d(1) of Regulation (EU) No 833/2014).

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*Note 2: The EU aviation law does not define 'aircraft charter'. Member States authorities should apply the definition of 'charter' in accordance with their national legislation and relevant international agreements.*

#### **Last updated:**

08/03/2024

#### **Link:**

<https://www.easa.europa.eu/de/faq/136179>

**As a Russian citizen, am I allowed to go through theoretical or practical training, either in an aircraft or flight simulation training device (FSTD), or take examinations, skill tests or proficiency checks in accordance with Regulation (EU) No 1178/2011?**

#### **Answer**

Training, testing and checking of Russian citizens is allowed if done for the purpose of operating a non-Russian-registered aircraft that is NOT owned or chartered<sup>(2)</sup> or otherwise controlled<sup>(1)</sup> by any Russian natural or legal person, entity or body.

If the intention of the applicant is to fly in Russia, at a Russian air carrier or Russian-registered aircraft or any non-Russian-registered aircraft that is owned or chartered or otherwise controlled by any Russian natural or legal person, entity or body, then such training, testing or checking is prohibited. Furthermore, the training, testing or checking cannot take place in Russia (c.f. Articles 3c(1) and 3d(1) of Regulation (EU) No 833/2014).

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the 'technical' or 'operational' sense (cf. para 48 [Judgement of the General Court Case T-233/22](#)).

*Note 2: The EU aviation law does not define 'aircraft charter'. Member States authorities should apply the definition of 'charter' in accordance with their national legislation and relevant international agreements.*

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08/03/2024

**Link:**

<https://www.easa.europa.eu/de/faq/139493>

**Is it allowed to issue a Part-FCL licence on the basis of a Russian licence (i.e. conversion)? Is there a difference if a person is a Russian citizen or not? If not, what to do with persons who have already started the process?**

**Answer**

Such licence issue would necessitate some training, testing and checking, which may be permitted, see [dedicated FAQ](#). However, competent authorities are reminded that licence conversion may necessitate contacting the Russian licensing authorities, which is currently not feasible.

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08/03/2024

**Link:**

<https://www.easa.europa.eu/de/faq/136181>

**Is it allowed to issue a validation of a pilot licence to a Russian citizen, for example if the pilot flies for an EU-based company?**

**Answer**

The same restrictions as for other training, testing and checking activities should apply here. However, competent authorities are reminded that licence validation may necessitate contacting the Russian licensing authorities, which is currently not feasible.

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08/03/2024

**Link:**

<https://www.easa.europa.eu/de/faq/136182>

**If a training organisation subject to Regulation (EU) No 1178/2011 operates a simulator manufactured by a Russian manufacturer and simulating Russian aircraft, is it affected by the sanctions?****Answer**

The sanctions covered by Regulation (EU) No 833/2014 do not limit the import of aircraft simulators from Russia, nor the support given by the Russian manufacturer to their use in the European Union. If the training is provided to persons that are not subject to the sanctions (i.e. persons not intending to operate aircraft subject to the sanctions), it may continue, provided that the flight simulator training device (FSTD) operator is able to continue to maintain its qualification certificate.

However, this answer is without prejudice to the possibility that these companies are owned or otherwise controlled by a person or entities subject to an asset freeze or prohibition of transactions. If that were the case, it would limit the possibility to trade with these companies.

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08/03/2024

**Link:**

<https://www.easa.europa.eu/de/faq/136183>

**If a Ukrainian pilot wants to validate/convert their licence, but obtaining a verification from the Ukrainian Civil Aviation Authority (CAA) is limited or even impossible, what are the options for such pilot to obtain a Part-FCL license?****Answer**

In respect of Ukraine, normal aviation rules (i.e. Regulation (EU) 2020/723) apply. Under the current circumstances, it is understandable that the Ukrainian CAA may not be able to provide normal service for verifications. Therefore, Member States might consider, for example, using the flexibility provided by Article 71 of the EASA Basic Regulation (Regulation (EU) 2018/1139), to facilitate such licence conversions or validation, taking also account of the possibility to mitigate any safety risks, e.g. by using more comprehensive skill tests and interviews.

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08/03/2024

**Link:**

<https://www.easa.europa.eu/de/faq/136184>

**If a Russian citizen has been issued with a Part-FCL licence but the person has not picked up the licence from the licensing authority yet, is it allowed to hand over the licence?**

**Answer**

Yes, provided that the purpose of the license is to operate a non-Russian aircraft, i.e. if the person is, for example, destined to fly as an employee on an EU airline or as a private pilot. If the intention is to fly in Russia, at a Russian air carrier or Russian-registered aircraft or any non-Russian-registered aircraft that is owned or chartered or otherwise controlled by any Russian natural or legal person, entity or body then handing over the licence would be support to the use of banned aircraft or operators and hence prohibited.

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*Note 2: The EU aviation law does not define 'aircraft charter'. Member States authorities should apply the definition of 'charter' in accordance with their national legislation and relevant international agreements.*

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**Link:**

<https://www.easa.europa.eu/de/faq/136297>

**Can Russian citizens apply for an EU medical certificate issued in accordance with Regulation (EU) No 1178/2011?**

**Answer**

Yes, provided that the purpose of the medical certificate is to operate a non-Russian aircraft, i.e. if the person is, for example, destined to fly as an employee on an EU airline or as a private pilot. If the intention is to fly in Russia or Russian-registered aircraft or any non-Russian-registered aircraft that is owned or chartered<sup>(2)</sup> or otherwise controlled<sup>(1)</sup> by any Russian natural or legal person, entity or body, then the person cannot be issued with an EU medical

certificate as that would be support to the use of banned aircraft or operators and hence prohibited.

*Note 1: The concept of 'control' is understood in the 'economic' or 'financial' sense and not in the 'technical' or 'operational' sense (cf. para 48 of [Judgement of the General Court Case T-233/22](#)).*

*Note 2: The EU aviation law does not define 'aircraft charter'. Member States authorities should apply the definition of 'charter' in accordance with their national legislation and relevant international agreements.*

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08/03/2024

**Link:**

<https://www.easa.europa.eu/de/faq/136298>

**Do the same principles apply to balloon and sailplane pilot training, testing and checking (e.g. Russian citizens, training sites, etc.) in accordance with Regulations (EU) 2018/395 and (EU) 2018/1976 as to training, testing and checking in accordance wit**

**Answer**

Yes. Regulation (EU) No 833/2014 does not differentiate between the different types of aircraft. Therefore, balloon and sailplane pilot licensing should be treated in the same manner as pilot licensing for any other aircraft.

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08/03/2024

**Link:**

<https://www.easa.europa.eu/de/faq/136908>

**Are EU sanctions also applicable to pilot training, testing and checking for aircraft listed in Annex I to Regulation (EU) 2018/1139 ('EASA Basic Regulation'), such as microlights?**

**Answer**

Yes. Since the scope of the Sanctions Regulations is much broader than that of the EASA Basic Regulation, the Sanctions Regulations apply to pilot training, testing and checking for all

types of aircraft, even if they do not fall within the scope of the common EU aviation safety legislation.

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**Link:**

<https://www.easa.europa.eu/de/faq/136909>

**As an approved training organisation (ATO) / organisation operating flight simulation training devices (FSTDs) subject to Regulation (EU) No 1178/2011 and having principal place of business outside the EU territory, am I allowed to provide either theoretic**

**Answer**

ATOs and organisations operating FSTDs that have their principal place of business (PPoB) outside the European Union are reminded that the privileges of their ATO approval or FSTD qualification certificate are to provide training, or to use the device for the purpose of obtaining a pilot licence, rating or certificate in accordance with Regulation (EU) No 1178/2011. When receiving requests from Russian citizens, these organisations should first verify whether it would be possible for a Member State to issue licences to these applicants, after completion of the training, testing or checking. EU Member States have certain restrictions in terms of issuing licenses to Russian citizens.

Furthermore, these organisations are also reminded that their training sites or FSTDs located within the territory of the European Union are fully subject to the restrictions of the Sanctions Regulations, hence they should apply the same principles as the organisations having their PPoB in the Member States. Therefore, please also consult the FAQs relevant to EU organisations.

Finally, as regards practical training, organisations should keep in mind that the Sanctions Regulations also apply on board any aircraft under the jurisdiction of a Member State (e.g. registered in a Member State).

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**Link:**

<https://www.easa.europa.eu/de/faq/136910>