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Flight Standards Directorate

**To all Foreign EASA Part-145 and Part-147  
Organisations**

Cologne, 16 May 2023

**Subject: Reminder letter on the sanctions to Russia for the Foreign EASA Part-145 and Part-147  
Organisations**

Dear Sir, Madam

As you are aware, the European Union (EU) adopted a comprehensive set of far-reaching restrictive measures in response to Russia's military attack on Ukraine in February 2022. These sanctions are mainly laid down in Regulation (EU) No 833/2014<sup>1</sup> and Regulation (EU) No 269/2014<sup>2</sup> (jointly referred to as the 'Sanction Regulations').

In particular, Regulation (EU) No 833/2014 imposes a number of sanctions in the aviation sector that prohibit the export of goods and technology, including aircraft and aircraft parts, as well as provision of services and technical assistance directly or indirectly, to any natural or legal person, entity or body in Russia or for use in Russia. This Regulation also contains flight prohibition in the EU airspace affecting aircraft registered in Russia or operated under the control of Russian stakeholders.

The European Union Aviation Safety Agency (EASA), as an agency of the European Union, is bound by these Sanction Regulations and is compelled to not participate knowingly and intentionally, in activities the object or effect of which is to circumvent prohibitions set out in the Sanction Regulations.

In view of the above, EASA wishes to remind organisations having their principle place of business in a third country, which are doing business in the airworthiness domain under an approval issued by EASA, that the privileges of their EU approval are granted to ensure initial and continuing airworthiness of aircraft, including any part or component for installation thereto, that are subject to Regulation (EU) No 748/2012<sup>3</sup> or Regulation (EU) No 1321/2014<sup>4</sup> (e.g. maintenance of aircraft

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<sup>1</sup> Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine

<sup>2</sup> Council Regulation (EU) No 269/2014 of 17 March 2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine

<sup>3</sup> Commission Regulation (EU) No 748/2012 of 3 August 2012 laying down implementing rules for the airworthiness and environmental certification of aircraft and related products, parts and appliances, as well as for the certification of design and production organisations

<sup>4</sup> Commission Regulation (EU) No 1321/2014 of 26 November 2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks

registered in the EU Members States or operated by an EU operator; production/release of aircraft parts to be installed on such aircraft; training of maintenance personnel to work on such aircraft, etc.).

Similarly, approved training organisations and organisations operating flight simulation training devices which have their principal place of business outside the EU are reminded that the privilege of their EASA approval is to provide training, or to use the device for the purpose of obtaining a pilot licence, rating, or certificate in accordance with Regulations (EU) No 1178/2011<sup>5</sup>.

The privileges of these approvals issued by EASA, therefore, are not to be used for the benefit of any natural or legal person, entity or body in Russia or for use in Russia.

Furthermore, third country operators (TCO) that are authorized by EASA in accordance with Regulation (EU) No 452/2014<sup>6</sup> are hereby also reminded not to operate any Russian registered aircraft, including as a marketing carrier in code-sharing or blocked- space arrangements, or any non-Russian-registered aircraft which is owned or chartered, or otherwise controlled by any Russian natural or legal person when operating within, into or out of the territory of the EU.

As part of its oversight activity EASA will closely monitor that organisations exercise the privileges of their EU approval in accordance with the limitations of the regulatory framework or comply with the restrictions imposed on their flight operations within the EU. EASA will also take all necessary measures if any non-compliance with the abovementioned requirements is identified.

Should you have any further questions, please remit them to your EASA allocated inspector.

We trust that the above clarifies the situation.

Ralf Erckmann

*Digitally signed in ARES - Valid without wet signature*

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<sup>5</sup> Commission Regulation (EU) No 1178/2011 of 3 November 2011 laying down technical requirements and administrative procedures related to civil aviation aircrew pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council

<sup>6</sup> Commission Regulation (EU) No 452/2014 of 29 April 2014 laying down technical requirements and administrative procedures related to air operations of third country operators pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council