European Union Aviation Safety Agency

EU restrictive measures against Russia

For more information, please see 'Restrictive measures – Russia's military attack on Ukraine'.

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.

Does ADS-L require a GNSS source or other external sensors to provide accurate positioning?

Answer

Devices transmitting ADS-L rely only on a GNSS position source, configuration settings, and pilot inputs to elaborate the ADS-L messages.

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15/05/2025

Link:
https://www.easa.europa.eu/en/faq/141894

Common Issues — Restrictive measures Russia

What is the legal basis for the EU restrictive measures against Russia?

Answer

In the aftermath of the Russian armed attack against Ukraine on 25.02.2022, the EU Council adopted different packages of sanctions against Russia. A comprehensive description of those measures can be found on the EU Council website.

The two key legislative instruments (“Sanctions Regulations”) are:

- Regulation (EU) No 833/2014: this Regulation contains the sectorial measures such as

export bans and other aviation measures such as the overflight ban.
- Regulation (EU) No 269/2014: this Regulation contains the asset freeze and the prohibition to make any funds or economic resources available to persons and entities that are listed. Please note that individuals can be subject to an asset freeze under other Regulations. This can be checked in the Financial Sanctions Files.

These legislative instruments have been amended many times since the start of the invasion of Ukraine to integrate new measures.

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Link:
https://www.easa.europa.eu/en/faq/136152

What does “technical assistance” mean?

Answer

The definition of “technical assistance” is laid down in Article 1(c) of Regulation (EU) No 833/2014, as amended by Regulation (EU) 2022/328 of 25 February 2022, and it means any technical support related to repairs, development, manufacture, assembly, testing, maintenance, or any other technical service, and may take forms such as instruction, advice, training, transmission of working knowledge or skills or consulting services, including verbal forms of assistance.

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https://www.easa.europa.eu/en/faq/136153

Do the Sanctions Regulations restrict a Russian citizen holding a personnel licence issued in accordance with Regulation (EU) 2018/1139 (the “EASA Basic Regulation”) to exercise the privileges of the licence inside the EU (e.g. flying an aircraft for private purposes or for an EU airline, conducting maintenance for an EU aircraft, working in an EU Part-145 organisation, working as cabin crew in EU airlines)?

Answer

It is necessary to make a distinction between a Russian citizen who holds a personnel licence and is employed by a non-sanctioned (EU or non-EU) carrier or organisation (e.g. Part-145 organisation), and someone who either flies or maintains an aircraft that is subject to sanctions, or flies privately. Exercising the privileges of an EU personnel license by Russian citizens for the benefit of an organisation not subject to the sanctions is permitted. Private or training flights with a certain category of aircraft may also be permitted. Further details may be found in FAQs addressing the various types of personnel licenses.

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Link:
https://www.easa.europa.eu/en/faq/136154

Who must comply with the provisions of Regulation (EU) No 833/2014? What about holders of dual EU-Russia citizenship?

Answer

EU sanctions create legal obligations for all EU operators, and in respect of any business conducted within the European Union. Article 13 of Regulation (EU) No 833/2014 defines the scope of jurisdiction. Dual nationality does not release a person from EU sanctions.

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https://www.easa.europa.eu/en/faq/136155

We understand that following evaluation of the terms “technical assistance” and “other services” as mentioned in the Sanctions Regulations, EASA has suspended certificates issued to organisations in Russia. Is this interpretation also applicable to approvals and certificates issued by EU Member States in the same way?

Answer

These definitions have the same meaning in all EU Member States, the Sanctions Regulations are directly applicable therein. It is the exclusive prerogative and responsibility of the Member States to assess and decide, on a case-by-case basis, on adequate actions to effectively

implement the Sanctions Regulations.

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Link:
https://www.easa.europa.eu/en/faq/136289

As the holder of an organisation approval (design organisation approval (DOA), production organisation approval (POA), maintenance organisation approval (MOA), continuing-airworthiness management organisation (CAMO), etc.) granted under Regulations (EU) Nos 748/2012 or 1321/2014, can I use my privileges for products, parts or appliances to be used by any natural or legal person, entity or body in Russia or for use in Russia?

Answer

No, the use of privileges granted under Regulations (EU) Nos 748/2012 or 1321/2014 is prohibited for products, parts or appliances to be used by any natural or legal person, entity or body in Russia or for use in Russia as referred to in Article 3c of Regulation (EU) No 833/2014.

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Link:
https://www.easa.europa.eu/en/faq/136905

Design certificates and design organisation approvals — Restrictive measures Russia

What actions has EASA taken concerning design certificates and design organisation approvals?

Answer

EASA suspended all type certificates, European Technical Standard Order (ETSO) authorisations and design organisation approvals issued by EASA to organisations in Russia.

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Link:
https://www.easa.europa.eu/en/faq/136157

Do the Sanctions Regulations supersede the continued-airworthiness obligations of the EU type certificate holders (TCHs) stemming from Regulation (EU) No 748/2012, hence, the continued airworthiness support to Russian operators and owners should be stopped?

Answer

Yes, the Sanctions Regulations supersede the continued-airworthiness support obligations of the EU TCHs and other design approval holders. In particular, with Article 3c (4)(a) of Regulation (EU) No 833/2014, as amended by Regulation (EU) 2022/328 of 25 February 2022, it is prohibited to provide technical assistance or other services related to the goods and technology suited for use in aviation or the space industry, whether or not originating in the Union, and to the provision, manufacture, maintenance and use of those goods and technology, directly or indirectly, to any natural or legal person, entity or body in Russia or for use in Russia.

In addition, pursuant to Article 3c(4)(c) of Regulation (EU) No 833/2014, as amended by Regulation (EU) 2023/1214 of 23 June 2023, it is prohibited to sell, license or transfer in any other way intellectual property rights or trade secrets as well as grant rights to access or reuse any material or information protected by means of intellectual property rights or constituting trade secrets related to the goods and technology suited for use in aviation or the space industry and to the provision, manufacture, maintenance and use of those goods and technology, directly or indirectly to any natural or legal person, entity or body in Russia or for use in Russia.

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Link:
https://www.easa.europa.eu/en/faq/136158

Does the definition of “technical assistance” cover the provision of safety-related information?

Answer

Yes. The definition of “technical assistance” is laid down in Article 1(c) of Regulation (EU) No

833/2014, as amended by Regulation (EU) 2022/328 of 25 February 2022, and it means any technical support related to repairs, development, manufacture, assembly, testing, maintenance, or any other technical service, and may take forms such as instruction, advice, training, transmission of working knowledge or skills or consulting services, including verbal forms of assistance. Thus, the definition covers also the provision of safety-related information. It is the operators' responsibility not to operate an aircraft if its state of safety is uncertain.

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Link:
https://www.easa.europa.eu/en/faq/136159

Am I allowed to send any type of technical information, including safety information related to the design, to my customer in Russia, or maintain my Russian customer's access to my dedicated IT system for such information (e.g. service bulletins, manuals)?

Answer

No, the provision of technical information, including safety information related to the design, is considered technical assistance to manufacture, maintenance and/or use of an aircraft under the sanctions. Please refer to the definition of "technical assistance" laid down in Article 1(c) of Regulation (EU) No 833/2014, as amended by Regulation (EU) 2022/328. Only information accessible to the public (e.g. EASA Safety Publications Tool — Airworthiness Directives) remains accessible to Russian customers.

In addition, pursuant to Article 3c(4)(c) of Regulation (EU) No 833/2014, as amended by Regulation (EU) 2023/1214 of 23 June 2023, it is prohibited to sell, license or transfer in any other way intellectual property rights or trade secrets as well as grant rights to access or reuse any material or information protected by means of intellectual property rights or constituting trade secrets related to the goods and technology suited for use in aviation or the space industry and to the provision, manufacture, maintenance and use of those goods and technology, directly or indirectly to any natural or legal person, entity or body in Russia or for use in Russia.

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Link:

https://www.easa.europa.eu/en/faq/136160

Are EU organisations permitted to answer questions received from the Russian Federal Air Transport Agency (FATA) about ongoing validation of modifications?

Answer

No. Providing answers to the questions would constitute technical assistance to FATA, which is prohibited by the EU sanctions.

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Link:
https://www.easa.europa.eu/en/faq/136162

Will EASA issue flight condition to Russian products issued with an EASA type certificate?

Answer

No, as that is considered technical assistance prohibited by the sanctions. Please refer to the definition of “technical assistance” laid down in Article 1(c) of Regulation (EU) No 833/2014, as amended by Regulation (EU) 2022/328 of 25 February 2022.

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Link:
https://www.easa.europa.eu/en/faq/136163

Can a holder of a design organisation approval (DOA) apply to EASA for a supplemental type certificate (STC) or other design approval (e.g. minor change) for a product, part or non-installed equipment that is to be installed on an aircraft operated by a Russian operator?

Answer

No. Design approvals for an aircraft operated by a Russian operator fall within the scope of the

Sanctions Regulations. Therefore, EASA will not accept such applications.

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Link:

https://www.easa.europa.eu/en/faq/136290

Can a holder of a design organisation approval (DOA) issue design approvals under its privileges, which are to be used on an aircraft operated by a Russian operator?

Answer

No. Design approvals for an aircraft operated by a Russian operator fall within the scope of the Sanctions Regulations. Therefore, no such approval is allowed to be issued under the DOA privileges.

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Link:

https://www.easa.europa.eu/en/faq/136291

EASA suspended aircraft type certificates issued to organisations in Russia. Can the individual aircraft of these types that is registered in EU Member States continue to be operated by EU operators?

Answer

The consequence of the suspension of the aircraft type certificate is that the Certificate of Airworthiness (CoA) for the individual aircraft of these type that is registered in the Member States loses its validity.

If the affected aircraft have been operated for military, customs, police search and rescue, firefighting, border control, coastguard or similar activities or services, these aircraft are not regulated by Article 2(3)(a) of Regulation (EU) 2018/1139 (the “EASA Basic Regulation”) and are subject to national law, unless the Member State decided under Article 2(6) of the Basic Regulation to apply the EU aviation safety legislation, among others, for the airworthiness of the aircraft. Therefore, it is for the State of Registry to determine the certification, continuing-airworthiness, and operational basis for aircraft that are used for activities and services listed in

Article 2(3)(a) of the Basic Regulation.

If the affected aircraft have been operated in accordance with the Basic Regulation, then these operations may continue either under a permit to fly to the extent permitted by Regulation (EU) No 748/2012, or through the issuance by the State of Operator of temporary exemptions under Article 71 of the Basic Regulation. Member States are advised to contact EASA prior to issuing such exemptions. Please note that under the Basic Regulation, it is not possible for EASA to issue specific airworthiness specifications (SASs) any longer.

It is the exclusive prerogative and responsibility of the Member States to assess and decide, on a case-by-case basis, on the possibility to use these aircraft, subject to either EU or national law, in view of the restrictive measures of the Sanctions Regulations and ensuring the principal objective of civil aviation safety.

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Link:
https://www.easa.europa.eu/en/faq/136292

Will EASA continue to monitor, and eventually adopt Russian Federal Air Transport Agency (FATA) Airworthiness Directives (ADs) for Russian aircraft types whose type certificate (TC) was suspended by EASA?

Answer

Regarding mandatory continuing-airworthiness information, EASA will continue to monitor the ADs issued by FATA on the six Russian aircraft types whose TCs were suspended by EASA and may adopt certain FATA ADs affecting types validated by EASA, even though the TC has been suspended.

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Link:
https://www.easa.europa.eu/en/faq/136293

Will Airworthiness Directives (ADs) issued by EASA to Russian aircraft types that were recently suspended remain valid?

Answer

Yes. These ADs remain valid and publicly available in the EASA Safety Publication Tool.

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20/01/2025

Link:

https://www.easa.europa.eu/en/faq/136294

My organisation is holder of a type certificate (TC) issued by EASA and a Russian operator of my product reported an occurrence to us. Are we allowed to have an exchange with the Russian operator to investigate the reported occurrence?

Answer

The sanctions do not prohibit that technical information is received by EASA TC holders (or other EASA design approval holders) from organisations or operators located in Russia. Therefore, EASA TC holders are not prevented from receiving or requesting information from a Russian operator of their product with a view to investigating an occurrence and evaluating the related safety issues. However, the EASA TC holder should ensure that during those exchanges no technical data or information (including those related to the type design), instruction, advice, working knowledge, skills or consulting services, etc. are provided by that TC holder to the Russian operator, as that would be considered provision of technical assistance related to goods and technology, which is forbidden by the sanctions.

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https://www.easa.europa.eu/en/faq/136161

Production organisations — Restrictive measures Russia

As the holder of a production organisation approval (POA) that is granted under Annex I to Regulation (EU) No 748/2012 (regardless of my principal place of business), can I release engines, propellers, parts or appliances with an EASA Form 1 to a customer in Russia, or for use in Russia?

Answer

In accordance with Article 3c(1) and 3c(4)(a) of Regulation (EU) No 833/2014, it is prohibited to sell, supply, transfer or export aeronautical goods listed in Annex XI to that Regulation, or to provide technical assistance or other services related to the goods and technology suited for use in aviation or the space industry, whether or not originating in the Union, and to the provision, manufacture, maintenance, and use of those goods and technology, directly or indirectly, to any natural or legal person, entity or body in Russia or for use in Russia.

Accordingly, holders of a POA that is granted under Annex I to Regulation (EU) No 748/2012 (regardless of their principal place of business) are forbidden to release engines, propellers, parts or appliances with an EASA Form 1 to a customer, broker, vendor, natural or legal person, entity or body known to be located in Russia or to be used in Russia.

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https://www.easa.europa.eu/en/faq/136164

As the holder of a production organisation approval (POA) that is granted under Annex I to Regulation (EU) No 748/2012 (regardless of my principal place of business), can I have (an) approved or unapproved location(s) in Russia from where I exercise my privileges granted under point 21.A.163 of that Regulation?

Answer

In accordance with Article 3c(4)(a) of Regulation (EU) No 833/2014, as amended by Regulation (EU) 2022/328 of 25 February 2022, it is prohibited to provide technical assistance or other services related to the goods and technology suited for use in aviation or the space industry, whether or not originating in the Union, and to the provision, manufacture, maintenance, and use of those goods and technology, directly or indirectly, to any natural or legal person, entity or body in Russia or known to be used in Russia.

Accordingly, holders of a POA that is granted under Annex I to Regulation (EU) No 748/2012 (regardless of their principal place of business) are forbidden to exercise their privileges from an approved or unapproved location in Russia.

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Link:

https://www.easa.europa.eu/en/faq/136165

As the holder of a production organisation approval (POA) that is granted under Annex I to Regulation (EU) No 748/2012 (regardless of my principal place of business), can I issue EASA Form 52 (Aircraft Statement of Conformity) or EASA Form 53 (Certificate of Release to Service) for an aircraft registered in Russia, owned by a Russian entity, or to be operated in Russia?

Answer

In accordance with Article 3c(4)(a) of Regulation (EU) No 833/2014, as amended by Regulation (EU) 2022/328 of 25 February 2022, it is prohibited to provide technical assistance or other services related to the goods and technology suited for use in aviation or the space industry, whether or not originating in the Union, and to the provision, manufacture, maintenance, and use of those goods and technology, directly or indirectly, to any natural or legal person, entity or body in Russia or for use in Russia.

Accordingly, holders of a POA that is granted under Annex I to Regulation (EU) No 748/2012 (regardless of their principal place of business) are forbidden to exercise their privileges on an aircraft registered in Russia, owned by a Russian natural or legal person, entity or body, or to be operated in Russia.

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https://www.easa.europa.eu/en/faq/136166

As the holder of a production organisation approval (POA) that is granted under Annex I to Regulation (EU) No 748/2012 (regardless of my principal place of business), can I issue a permit to fly for an aircraft registered in Russia, owned by a Russian entity, or to be operated in Russia?

Answer

In accordance with Article 3c(4)(a) of Regulation (EU) No 833/2014, as amended by Regulation (EU) 2022/328 of 25 February 2022, it is prohibited to provide technical assistance or other services related to the goods and technology suited for use in aviation or the space industry, whether or not originating in the Union, and to the provision, manufacture, maintenance, and

use of those goods and technology, directly or indirectly, to any natural or legal person, entity or body in Russia or for use in Russia.

Accordingly, holders of a POA that is granted under Annex I to Regulation (EU) No 748/2012 (regardless of their principal place of business) are forbidden to exercise their privileges on an aircraft registered in Russia, owned by a Russian natural or legal person, entity or body, or to be operated in Russia.

However, for an aircraft registered in the European Union, operated within the EU airspace by an EU operator and owned by an EU entity regardless of its livery and end-customer, issuing a permit to fly for the purpose of completing the manufacturing cycle and/or reallocating the customer would not be forbidden by the existing EU sanctions against Russia.

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Link:
https://www.easa.europa.eu/en/faq/136167

Aircraft maintenance and continuing airworthiness — Restrictive measures Russia

What actions has EASA taken in the domain of aircraft maintenance?

Answer

EASA has suspended all Part-145 and continuing-airworthiness management organisation (CAMO) approvals issued by EASA to organisations in Russia.

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Link:
https://www.easa.europa.eu/en/faq/136168

As an organisation approved in accordance with Regulation (EU) 1321/2014, am I allowed to provide maintenance services to Russian-operated*, -registered, or -owned aircraft which are for use in Russia, including engines, components, and parts thereof?

Answer

**Operated by a natural person that is a resident of Russia, or any legal person, entity or body established in Russia.*

According to Article 3c of Regulation (EU) No 833/2014, as amended by Regulation (EU) 2022/328, such aircraft cannot benefit from services regulated under Regulation (EU) No 1321/2014 as detailed in the following:

Under Article 3c(4), it is prohibited to provide:

1. technical assistance (which includes any technical support related to maintenance as per Article 1(c)) related to the goods and technology in the Annex; and
2. maintenance of those goods and technology,

directly or indirectly, to any natural or legal person, entity or body in Russia or for use in Russia.

In addition, the following terms should be understood as:

1. “Any natural or legal person, entity or body in Russia” should be understood as covering any natural person that is a resident of Russia, and any legal person, entity or body established in Russia, independently of their citizenship/ownership. To the contrary, the expression does not cover Russian citizens or Russian-owned companies that are not resident in Russia/established in Russia.
2. “For use in Russia” should be understood as covering the sale/supply/transfer/export of goods/services that would be used in Russia, including operations between two points in Russia.

A. Scope of application of Article 3c in relation to maintenance/repair

Considering the above:

It is prohibited, under Article 3c, to provide repair /maintenance services to:

- any aircraft operated by a Russian air carrier, as Russian air carriers are companies incorporated in Russia, hence fall in the scope of “natural or legal persons, entities or bodies in Russia”;
- any aircraft owned by a person that is a resident of Russia, or by a company established in Russia, independently of their citizenship/ownership, as such persons/companies also fall in the scope of “natural or legal persons, entities or bodies in Russia”;
- any aircraft, independently of its ownership, which is being used or will be used for providing air transport services between points inside Russia (whether in connection or not with an international service).

For the sake of clarification, this prohibition applies also if the above-mentioned aircraft are

grounded in the European Union. **It is not prohibited**, under Article 3c, to provide repair /maintenance to:

- an aircraft that is owned by a natural person which resides outside of Russia, or by a company established outside of Russia, even if the natural person has Russian citizenship or that the company is Russian-owned, unless the aircraft is being used or will be used for providing air transport services between points inside Russia (whether in connection or not with an international service).

When an aircraft is owned by a natural or legal person, entity or body in Russia, and is leased to a non-Russian airline/company, it can be repaired/maintained if the leasing contract imposes on the lessee the obligation to maintain that aircraft.

B. The scope of application of Article 3c in relation to technical assistance

The term “technical assistance” is defined in Article 1(c) of Regulation (EU) No 833/2014, as amended by Regulation (EU) 2022/328, as “any technical support related to repairs, development, manufacture, assembly, testing, maintenance, or any other technical service, and may take forms such as instruction, advice, training, transmission of working knowledge or skills or consulting services, including verbal forms of assistance”.

Based on that definition and the above clarification of the meaning of “natural or legal persons, entities or bodies in Russia” and “for use in Russia”, it is **prohibited**, under Article 3c, to provide technical assistance (which includes any technical support related to maintenance) related to the aviation goods and technology to:

- any Russian air carrier;
- any natural person that is a resident of Russia, or any company established in Russia, independently of their citizenship/ownership;
- a natural person or company established outside Russia, independently of their citizenship/ownership, if that person makes use of the received assistance/services in Russia, or uses the assistance/service received to provide assistance/services to an aircraft/parts/components used in Russia, including between points inside Russia (whether in connection or not with an international service).

The above prohibition applies independently of whether the assistance/service is physically provided in the territory of the European Union or outside.

It is **not prohibited**, under Article 3c, to provide technical assistance (including maintenance) services related to the aviation goods and technology and to the provision, manufacture, maintenance, and use of those goods and technology, directly or indirectly, to:

- a natural person that resides outside of Russia, or to a company established outside of Russia, even if that natural person has Russian citizenship or that company is Russian-

owned, unless that natural person or company would make use of the received assistance/services in Russia, or use the assistance/service received to provide assistance/services to an aircraft/parts/components used in Russia, including between points inside Russia (whether in connection or not with an international service).

Furthermore, maintenance organisations are also reminded that the privileges of their EU approval are granted to ensure continuing airworthiness of aircraft, including any component for installation thereto, subject to Regulation (EU) No 1321/2014.

Finally, please see also FAQ #136906 for the situation where the asset freeze list contained in Annex I to Regulation (EU) No 269/2014 applies.

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https://www.easa.europa.eu/en/faq/136169

Is it allowed for a maintenance organisation to provide maintenance services to Russian aircraft subject to the sanctions, including engines, components and parts thereof, to facilitate their storage while they are banned from operating in the EU airspace, e.g. to park aircraft for short-term storage, engine preservation etc.?

Answer

Maintenance organisations are not prevented from, e.g. towing the sanctioned aircraft to a parking position where it can be stored out of the way and from fixing any leaks etc. to avoid environmental problems, but measures to retain or improve the value or airworthiness of sanctioned aircraft intended for use in Russia, are not as such allowed. For guidance on the interpretation of the restrictive measures affecting aircraft maintenance services, please consult FAQ #136169.

However, maintenance service can be made available for aircraft, including engines, components and parts thereof, owned by EU leasing companies, which are being returned from Russian operators, because at that point they are no longer operated by the Russian operator. The EU leasing company has taken control of the aircraft, engine, component, or part and may return it to a location outside Russia.

Please see however question FAQ #136906 for the situation where the asset freeze list contained in Annex I to Regulation (EU) No 269/2014 applies.

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Link:
https://www.easa.europa.eu/en/faq/136170

Is it allowed for an EU maintenance organisation to perform maintenance in Russia in accordance with Regulation (EU) No 1321/2014 on EU-registered aircraft in order for them to meet the airworthiness requirements necessary for the return flight or in order to meet their leasing return conditions?

Answer

Yes, assuming that the aircraft is not in a Russian register and has been returned to the lessor's control. This is allowed because once the aircraft has been returned to the (non-Russian) lessor, it is no longer chartered, leased or otherwise controlled by a Russian person as per Article 3d of Regulation (EU) No 833/2014.

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Link:
https://www.easa.europa.eu/en/faq/136171

Is it allowed for a maintenance organisation approved by EASA under Part-145 to perform maintenance on components and provide such components to a non-EU, non-Russian operator, if this operator operates the aircraft to Russia?

Answer

Yes, if this aircraft is not being used to fly domestically in Russia, or to otherwise circumvent the sanctions (NB Article 12 of Regulation (EU) No 833/2014 prohibits any measures that would result in circumventing the sanctions).

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Link:
https://www.easa.europa.eu/en/faq/136172

Can maintenance services be provided to aircraft operated by an EU operator that is owned by a Russian citizen/entity?

Answer

A maintenance organisation should first identify whether a listed individual or entity under EU sanctions* owns or controls the aircraft. If this is the case, this individual or entity is subject to an asset freeze and a prohibition to make funds and economic resources, hence, the services should not be provided.

Furthermore, as to whether it is allowed to provide maintenance services, maintenance organisations are invited to consult the guidance provided in FAQ #136169 regarding the interpretation of Article 3c of Regulation (EU) No 833/2014 as regards aircraft to be used in Russia.

Should maintenance services be possible according to Article 3c, please note that Article 3d of Regulation (EU) No 833/2014 forbids any aircraft operated by Russian air carriers, including as a marketing carrier in code-sharing or blocked-space arrangements, or for any Russian-registered aircraft, or for any non-Russian-registered aircraft which is owned or chartered, or otherwise controlled by any Russian natural or legal person, entity or body, to land in, take off from or overfly the territory of the Union. This prohibition also applies to any other aircraft which is used for a non-scheduled flight and with regard to which a Russian natural or legal person, entity or body is in a position to effectively determine the place or time of its take-off or landing. However, without prejudice to the rules laid down in Commission Implementing Regulation (EU) No 923/2012 with regard to the submission of a flight plan for flights across borders, this prohibition does not apply to manned aircraft that have a maximum seating capacity of 4 persons and a maximum take-off mass of no more than 2000 kg when used for private, non-commercial, non-corporate flights carried out within Union territory and airspace for recreational purposes or for the purpose of training for private pilot licences and related ratings with Union training providers. Hence, aircraft subject to such a flight prohibition may (unless owned or controlled by an individual or entity subject to an asset freeze/prohibition to make funds and economic resources) receive maintenance services in the European Union but be prohibited from flying.

*This can be checked in the Financial Sanctions Files.

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Link:
https://www.easa.europa.eu/en/faq/136906

EASA suspended certain type certificates (TCs) issued to holders in Russia in accordance with the Sanctions Regulations. A maintenance organisation has one of those TCs on its approval. As the competent authority for such a maintenance organisation, do we have to limit or suspend partially the approval of the organisations with respect to the suspended TC?

Answer

No, the approval certificate does not need to be changed to remove the suspended TC from the privileges of the organisation. The organisations should not perform and certify maintenance on an aircraft type whose TC has been suspended (as per Article 3c(4) of Regulation (EU) No 833/2014), but the privileges of the approval certificate remain unaffected.

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Link:
https://www.easa.europa.eu/en/faq/136907

Training and licensing of maintenance personnel — Restrictive measures Russia

What actions has EASA taken concerning training of maintenance personnel?

Answer

EASA suspended all Part-147 organisation approvals issued by EASA to organisations in Russia.

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Link:
https://www.easa.europa.eu/en/faq/136173

I am an EU national and holder of a Part-66 licence. Am I allowed to work, either within or outside the European Union, on Russian-owned or -operated

aircraft?

Answer

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

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Link:
https://www.easa.europa.eu/en/faq/136174

The Sukhoi Superjet type certificate (TC) is suspended by EASA. In the EU Member States, there are Part-66 licences containing this type rating. Does the competent authority need to suspend this rating in those maintenance licences?

Answer

No. It is the maintenance activity that is prohibited by the EU sanctions, but the privilege of the Part-66 licences remains unaffected.

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15/03/2022

Link:
https://www.easa.europa.eu/en/faq/136175

As an organisation approved by a Member State in accordance with Annex IV (Part-147) to Regulation (EU) No 1321/2014 and having my principal place of business within the territory of the European Union, am I allowed to provide training to Russian citizens?

Answer

In principle, it is prohibited to provide technical assistance related to maintenance, directly or indirectly to any natural or legal person, entity or body in Russia or for use in Russia (Article 3(4)(a) of Regulation (EU) No 833/2014). Training of maintenance personnel could be allowed if done for the purpose of later working for a maintenance organisation subject to Regulation

(EU) No 1321/2014 outside Russia. If the purpose of the training is to work in Russia or on Russian aircraft subject to the restrictive measures, such training provision is prohibited. Furthermore, the training cannot take place in Russia.

Last updated:

29/03/2022

Link:

https://www.easa.europa.eu/en/faq/136295

As competent authority of an EU Member State, am I allowed to issue a Part-66 licence to a Russian national?

Answer

Yes, provided that the candidate works or is due to be working for a maintenance organisation subject to Regulation (EU) No 1321/2014 outside of Russia.

Last updated:

11/08/2022

Link:

https://www.easa.europa.eu/en/faq/136296

Aircrew training and licensing — Restrictive measures Russia

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/en/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/en/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 having my principal place of business within the EU territory, am I allowed to provide either theoretical or practical training, in an FSTD or in an aircraft, to Russian citizens?

Answer

Training, testing and checking of Russian citizens is allowed if done for the purpose of operating outside of Russia with a non-Russian-registered aircraft that is NOT owned or chartered(Note 2), or otherwise controlled(Note 1) by any Russian natural or legal person, entity or body. Further to such training for commercial licences or related ratings, training (and associated testing and checking) for the purpose of private pilot licences and related ratings with Union training providers is allowed in manned aircraft that have a maximum seating capacity of 4 persons and a maximum take-off mass of no more than 2000 kg, even if the intention is to fly after the licence issue, with a Russian pilot controlling the flight.

If the intention of the applicant is to fly in Russia, for 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 (Articles 3c(1) and 3d(1) of Regulation (EU) No 833/2014).

Note 1: Except for non-scheduled flights, with regard to which a Russian natural or legal person, entity or body is in a position to effectively determine the place or time of its take-off or

landing, 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'. EU Member States' authorities should apply the definition of 'charter' in accordance with their national legislation and relevant international agreements.

Last updated:
24/03/2025

Link:
https://www.easa.europa.eu/en/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 who hold either a Part-FCL or other third-country license (i.e. for the purpose of obtaining an EU Part-FCL licence, rating or certificate)?

Answer

Training, testing, and checking of Russian citizens is allowed if done for the purpose of operating outside of Russia with a non-Russian-registered aircraft that is NOT owned or chartered(Note 2) or otherwise controlled(Note 1) by any Russian natural or legal person, entity or body. Further to such training for commercial licences or related ratings, training (and associated testing and checking) for the purpose of private pilot licences and related ratings with Union training providers is allowed in manned aircraft that have a maximum seating capacity of 4 persons and a maximum take-off mass of no more than 2000 kg, even if the intention is to fly after the licence issue, with a Russian pilot controlling the flight.

If the intention of the applicant is to fly in Russia, for 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 (Articles 3c(1) and 3d(1) of Regulation (EU) No 833/2014).

Note 1: Except for non-scheduled flights, with regard to which a Russian natural or legal person, entity or body is in a position to effectively determine the place or time of its take-off or

landing, 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'. EU Member States' authorities should apply the definition of 'charter' in accordance with their national legislation and relevant international agreements.

Last updated:
24/03/2025

Link:
https://www.easa.europa.eu/en/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 outside of Russia with a non-Russian-registered aircraft that is NOT owned or chartered(Note 2) or otherwise controlled(Note 1) by any Russian natural or legal person, entity or body. Further to such training for commercial licences or related ratings, training (and associated testing and checking) for the purpose of private pilot licences and related ratings with Union training providers is allowed in manned aircraft that have a maximum seating capacity of 4 persons and a maximum take-off mass of no more than 2000 kg, even if the intention is to fly after the licence issue, with a Russian pilot controlling the flight.

If the intention of the applicant is to fly in Russia, for 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 (Articles 3c(1) and 3d(1) of Regulation (EU) No 833/2014).

Note 1: Except for non-scheduled flights, with regard to which a Russian natural or legal person, entity or body is in a position to effectively determine the place or time of its take-off or landing, 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'. EU Member States' authorities should apply the definition of 'charter' in accordance with their national legislation and relevant international agreements.

Last updated:
24/03/2025

Link:
https://www.easa.europa.eu/en/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 FAQ #139493. However, competent authorities are reminded that licence conversion may necessitate contacting the Russian licensing authorities, which is currently not feasible.

Last updated:
08/03/2024

Link:
https://www.easa.europa.eu/en/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.

Last updated:
08/03/2024

Link:
https://www.easa.europa.eu/en/faq/136182

If a training organisation subject to Regulation (EU) No 1178/2011 operates a flight simulator training device (FSTD) that is manufactured by a Russian manufacturer and simulating Russian aircraft, is the FSTD 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 FSTD operator is able to continue to maintain the FSTD's 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.

Last updated:
20/01/2025

Link:
https://www.easa.europa.eu/en/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 Regulation (EU) 2018/1139 (the "EASA Basic Regulation"), 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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20/01/2025

Link:
https://www.easa.europa.eu/en/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 in a manned aircraft that has a maximum seating capacity of 4 persons and a maximum take-off mass of no more than 2000 kg when used for private, non-commercial, non-corporate, flights carried out within Union territory and airspace for recreational purposes. Otherwise, handing over the licence would be support to the use of banned aircraft or operators and hence prohibited.

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24/03/2025

Link:
https://www.easa.europa.eu/en/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 in a manned aircraft that has a maximum seating capacity of 4 persons and a maximum take-off mass of no more than 2000 kg when used for private, non-commercial, non-corporate, flights carried out within Union territory and airspace for recreational purposes. Otherwise, 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.

Last updated:

24/03/2025

Link:

https://www.easa.europa.eu/en/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 with Regulation (EU) No 1178/2011?

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/en/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. However, training (and associated testing and checking) for the purpose of private pilot licences and related ratings with Union training providers is allowed in manned aircraft that have a maximum seating capacity of 4 persons and a maximum take-off mass of no more than 2000 kg.

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24/03/2025

Link:

https://www.easa.europa.eu/en/faq/136909

As an approved training organisation (ATO) / organisation operating flight simulation training devices (FSTDs) subject to Regulation (EU) No 1178/2011 and having my principal place of business outside the EU territory, am I allowed to provide either theoretical or practical training, in an FSTD or in an aircraft, to Russian citizens?

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 an EU 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 an EU Member State (e.g. registered in an EU Member State).

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08/03/2024

Link:
https://www.easa.europa.eu/en/faq/136910

Aircraft operations — Restrictive measures Russia

Are aircraft registered in Russia or operated by Russian operators allowed to fly into the European Union?

Answer

No, in accordance with Article 3d of Regulation (EU) No 833/2014, they are not allowed such operations, with limited exceptions.

The general principle is a flight prohibition if:

1. the aircraft is operated by a Russian air carrier;
2. the aircraft is registered in Russia;
3. the aircraft is owned or chartered(Note 2) or otherwise controlled(Note 1) by any Russian natural or legal person, entity or body; or
4. the aircraft is used for a non-scheduled flight with regard to which a Russian natural or legal person, entity or body is in a position to effectively determine the place or time of its take-off or landing; the flight prohibition for non-scheduled flights applies, for example, to requests of Russian natural persons to be transported to specific holiday destinations or of Russian legal persons to transport their employees to business meetings in the Union or their clients to tourist destinations.

The restrictive measures do not forbid to take Russian citizens on board if the aircraft does not meet the above criteria. If there are more people on board (e.g. 10 people rented the aircraft, while 2 of them are Russian citizens) it is up to the national authority to make sure there is no circumvention of the prohibition. However, flights should be prohibited if there are physical persons on board the aircraft who are subject to a listing under the Sanctions Regulations (in particular, subject to a travel ban).

Exceptions to the flight prohibition under Article 3d (Note 3):

The manned aircraft is exceptionally allowed to operate in the following circumstances:

1. aircraft which a Russian person merely pilots without being in a position to effectively determine the place or time for its take-off or landing, such as in the case of pilots employed by non-Russian air carriers;
2. aircraft that have a maximum seating capacity of 4 persons and a maximum take-off mass of no more than 2000 kg, when used for private, non-commercial, non-corporate, flights carried out within Union territory and airspace for recreational purposes or for the purpose of training for private pilot licences and related ratings with Union training providers;
3. an emergency landing or emergency overflight;
4. flights specifically authorised by EU Member States for humanitarian purposes or for any other purpose consistent with the objectives of Regulation (EU) No 833/2014.

Note 1: Except for non-scheduled flights, with regard to which a Russian natural or legal person, entity or body is in a position to effectively determine the place or time of its take-off or

landing, 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'. EU Member States' authorities should apply the definition of 'charter' in accordance with their national legislation and relevant international agreements.

Note 3: The exceptions under Article 3d, listed above, are without prejudice to possible other sanctions, such as the prohibition in Article 3c to support through e.g. maintenance actions, aircraft used to fly domestically in Russia.

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24/03/2025

Link:
https://www.easa.europa.eu/en/faq/136185

Do the flight prohibitions in Regulation (EU) No 833/2014 cover also natural persons with dual nationality?

Answer

As 'Russian natural person' should be understood any person with Russian nationality, regardless of whether that person also possesses another nationality, other citizenship(s) or has permanent residency in the European Union. For the dedicated exemptions applicable to certain manned aircraft, when used for private, non-commercial, non-corporate, flights carried out within Union territory and airspace for recreational or training purposes, please consult FAQ #136185.

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24/03/2025

Link:
https://www.easa.europa.eu/en/faq/136186

What happens to the dry lease- and wet-lease arrangements and code-sharing agreements between EU air operator certificate (AOC) holders and Russian aircraft operators?

Answer

If the lease concerns a prohibited operation, then such lease agreements should not be approved by National Competent Authorities (NCAs) in accordance with Regulation (EU) No 965/2012. In addition, any existing wet-lease or dry-lease approvals or code-sharing agreements with aircraft operators of Russia or with respect to aircraft registered in Russia should be revoked or terminated, as applicable. It is also prohibited under Article 3c of Regulation (EU) No 833/2014 to lease (supply) aircraft to Russian entities or for use in Russia.

Last updated:
20/01/2025

Link:
https://www.easa.europa.eu/en/faq/136188

My organisation is a navigational database provider established in the European Union. Am I allowed to provide updates of my product to my Russian customer?

Answer

No. Providing updates to navigational databases falls under the EU restrictive measures, according to which it is prohibited to sell, supply, transfer or export, directly or indirectly, goods and technology suited for use in aviation or the space industry (i.e. aircraft, spacecraft, and parts thereof), whether or not originating in the European Union, to any natural or legal person, entity or body in Russia or for use in Russia (Article 3c(1) of Regulation (EU) No 833/2014).

In addition, Article 2a of that Regulation explicitly bans the export of goods and technology which might contribute to Russia's military and technological enhancement, such as software and technology for the 'development', 'production' or 'use' of navigation, airborne communication, and other avionics equipment (items X.D.V.001 and X.E.V.001 of Annex VII to said Regulation).

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20/01/2025

Link:
https://www.easa.europa.eu/en/faq/136299

As a Russian citizen, am I allowed to fly an aircraft for private purposes in

the airspace of the European Union (e.g. exercise the privileges of my private pilot licence (PPL), sailplane pilot licence (SPL), balloon pilot licence (BPL) or national pilot license issued to fly Annex I aircraft, such as microlights, etc.)? Can I fly my own aircraft or rent, borrow for free or use an aircraft of a flying club to exercise my private pilot privileges?

Answer

Russian citizens, regardless of them holding another citizenship, can exercise private pilot privileges in a manned aircraft that has a maximum seating capacity of 4 persons and a maximum take-off mass of no more than 2000 kg when used for private, non-commercial, non-corporate, flights carried out within Union territory and airspace for recreational purposes.

This means that Russian citizens are not prevented from flying their own aircraft or renting, borrowing for free or otherwise using aircraft of a flying club to exercise their private pilot privileges, provided that the aircraft have a maximum seating capacity of 4 persons and a maximum take-off mass of no more than 2000 kg.

Training (and associated testing and checking) for the purpose of private pilot licences and related ratings with Union training providers is also allowed in manned aircraft that have a maximum seating capacity of 4 persons and a maximum take-off mass of no more than 2000 kg.

Competent authorities will monitor such private flight activities to ensure that they are not performed in a way to circumvent the sanctions outlined in Article 3d of Regulation (EU) No 833/2014.

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24/03/2025

Link:
https://www.easa.europa.eu/en/faq/136911

Is it allowed for Russian citizens to fly, either as pilot-in-command or co-pilot, a non-Russian-registered aircraft that performs flights under a non-Russian air operator certificate (AOC), or an aircraft whose owner is not Russian?

Answer

Yes, such flights are allowed provided that:

1. the pilot is an employee (or similar) of an air carrier or aircraft operator; and
2. the aircraft is not operated by a Russian air carrier, not registered in Russia, and not owned or chartered(Note 2) or otherwise controlled(Note 1) by any Russian natural or legal person, entity or body.

Note 1: Except for non-scheduled flights, with regard to which a Russian natural or legal person, entity or body is in a position to effectively determine the place or time of its take-off or landing, 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'. EU 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/en/faq/136912

Is it allowed to register and then fly an aircraft in an EU Member State when the aircraft is owned by a company incorporated in the European Union but the owner of that company is a Russian natural person?

Answer

The Sanctions Regulations do not prevent an EU Member State from entering the aircraft on its national register, but after registration the aircraft may not be allowed to fly:

1. If the owner of the company is a Russian citizen, the aircraft is not allowed to take off from, land in or overfly the European Union in accordance with Article 3d of Regulation (EU) No 833/2014. The fact that the company is registered in an EU Member State does not change this.
2. It is not possible to provide any economic resources, which includes services, to persons subject to an asset freeze and/or a prohibition to make resources available under EU sanctions (e.g. Regulation (EU) No 269/2014). Hence, it would not be possible to register any aircraft owned, directly or indirectly, or otherwise controlled by 'listed' Russian persons.

Last updated:
20/01/2025

Link:
https://www.easa.europa.eu/en/faq/136913

Why do the restrictive measures not include a general ban on an air carrier established in the European Union (an aircraft operator certificate (AOC) holder) from operating aircraft that would fall within the scope of Article 3d(1) of Regulation (EU) No 833/2014 for flights outside the European Union?

Answer

The measures are designed to affect flights into/from/over the EU territory.

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08/03/2024

Link:
https://www.easa.europa.eu/en/faq/136914

Are there any specific information-sharing obligations for operators of non-scheduled flights to demonstrate that they are adhering to the requirements concerning flight prohibition, which are outlined in the Sanctions Regulations?

Answer

Without prejudice to Article 3d(5) of Regulation (EU) No 833/2014, upon request of the competent authorities of the Member State of departure, destination or overflying, aircraft operators shall provide, for non-scheduled flights, information needed for the purpose of verifying compliance with Article 3d(1) of said Regulation, including, among other information:

1. credible and satisfactory information regarding the actual ultimate beneficial owner of the aircraft and, where applicable, of the natural or legal person, entity or body ultimately chartering the aircraft; and
2. a general declaration, passenger manifest and other official documents displaying the full names, birth dates, birth places and nationalities of all passengers and the crew members, where EU Member States' authorities consider that reasonable grounds to suspect

circumvention of the prohibition in Article 3d(1) exist, based on factors such as routing and origin of the flight or information about the relevant operator.

The information shall be provided in advance of landing in, taking off from or overflying the territory of the Union, within a deadline set by the competent authorities of the Member State or Member States concerned.

Any processing of personal data pursuant to Article 3d(1) shall be carried out in accordance with this Regulation and with Regulations (EU) 2016/679 and (EU) 2018/1725 and only in so far as necessary for the application of Regulation (EU) 833/2014.

Last updated:
20/01/2025

Link:
https://www.easa.europa.eu/en/faq/141519

EASA TCO authorisations — Restrictive measures Russia

Are third-country operator (TCO) authorisations that are issued by EASA to airlines from Russia still valid?

Answer

No, in application of the Sanctions Regulations, EASA has suspended all TCO authorisations for operators in respect of which Russia acts as the State of Operator.

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20/01/2025

Link:
https://www.easa.europa.eu/en/faq/136189

Is a third-country operator (TCO) one-off notification under point TCO.305 of Regulation (EU) No 452/2014 needed from a Russian operator for (a) flight(s) performed under an exemption that is granted by an EU Member State in accordance with Article 3d(3) of Regulation (EU) No 833/2014?

Answer

As a result of the restrictive measures enacted through Regulation (EU) No 833/2014 prohibiting Russian aircraft operators to land in, take off from or overfly the European Union, EASA suspended all TCO authorisations issued to Russian air carriers. Due to the practical impact of the sanctions on the Russian operators, EASA is not in a position to conduct effective oversight of Russian TCO-authorised operators and to attest their safety in compliance with Regulation (EU) No 452/2014.

Regulation (EU) No 833/2014 does, however, allow EU Member States to exceptionally authorise certain operations into their territory by Russian aircraft operators subject to flight prohibition set out in Article 3d(1) of said Regulation based on an authorisation issued in accordance with Article 3d(3) of that Regulation, in particular for humanitarian purposes or any other purpose consistent with the objectives of that Regulation. EASA is not involved in the issuance of such authorisations, which are an exclusive prerogative and responsibility of the EU Member States, and operations under such authorisations do not require notifications from the operator to EASA under Regulation (EU) No 452/2014.

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20/01/2025

Link:
https://www.easa.europa.eu/en/faq/136300

Operation of unmanned aircraft — Restrictive measures Russia

Does the flight ban in Article 3d of Regulation (EU) No 833/2014 apply to unmanned aircraft?

Answer

Yes. Under Regulation (EU) No 833/2014, it is prohibited for Russian unmanned-aircraft operators to operate within the European Union. The Regulation makes no distinction between manned and unmanned aircraft.

This means in particular that it is not permitted to fly Russian-registered unmanned aircraft or non-Russian-registered unmanned aircraft that are owned or chartered(Note 2) or otherwise controlled(Note 1) by a Russian natural or legal person, entity or body (regardless of the actual registration requirements for such unmanned aircraft). It is also not allowed to operate any other unmanned aircraft that is used for a non-scheduled flight and with regard to which a Russian natural or legal person, entity or body is in a position to effectively determine the place

or time of its take-off or landing.

However, unmanned aircraft operated in the “open” category, as defined in Article 4 of Commission Implementing Regulation (EU) 2019/947, and used for private, non-commercial, non-corporate flights carried out within Union territory and airspace for recreational purposes, may be authorised by the competent authorities, under such conditions as they deem appropriate, to land in, take off from or overfly the territory of the Union.

The Member State or Member States concerned shall inform the other Member States and the Commission of any such authorisation granted within two weeks of the authorisation.

This exception is without prejudice to the possibility for EU Member States to establish operational conditions for UAS geographical zones for safety, security, privacy or environmental reasons as provided for in Article 15(1)(a) of Regulation (EU) 2019/947.

Note 1: Except for non-scheduled flights, with regard to which a Russian natural or legal person, entity or body is in a position to effectively determine the place or time of its take-off or landing, 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’. EU Member States’ authorities should apply the definition of ‘charter’ in accordance with their national legislation and relevant international agreements.

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24/03/2025

Link:
https://www.easa.europa.eu/en/faq/136190

How to conduct operations if a drone operator is formally registered in the European Union but every document that they have provided to the EU Member State with the application for an operational authorisation (including the operations manual and risk assessment) clearly indicates that the actual operator is indeed a Russian operator?

Answer

Under the Sanctions Regulations, it is prohibited for Russian unmanned-aircraft operators to operate within the European Union. If the competent authority has grounds to believe that the

actual operator is not the EU applicant but the operator from Russia, the application should be rejected.

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20/01/2025

Link:
https://www.easa.europa.eu/en/faq/136191

ATM/ANS — Restrictive measures Russia

Are aeronautical data services (DAT) providers located in the European Union permitted to continue to supply aeronautical information to customers in Russia?

Answer

As entities located in the European Union, aeronautical DAT providers are not allowed under Regulation (EU) No 833/2014 to provide technical assistance or other services related to aviation, directly or indirectly, to any natural or legal person, entity or body in Russia or for use in Russia.

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Link:
https://www.easa.europa.eu/en/faq/136192

Are aeronautical data services (DAT) providers located in the European Union permitted to continue to receive aeronautical information from Russian authoritative sources (e.g. Russian aeronautical information publication (AIP)), necessary to build their products?

Answer

Receiving aeronautical information from an authoritative source in Russia is not impeded by the Sanctions Regulations, insofar as the aeronautical DAT provider does not engage in any transactions prohibited under Regulation (EU) No 833/2014 or make funds or economic resources available to persons/entities that are listed under EU sanctions, for instance in Regulation (EU) No 269/2014.

Last updated:

20/01/2025

Link:

https://www.easa.europa.eu/en/faq/136916

Regarding technical assistance, in particular the dissemination of aeronautical information, can this information be provided to Russian operators when they are operating over the Atlantic Ocean?

Answer

According to Article 3d of Regulation (EU) No 833/2014, as amended, it is prohibited for any aircraft operated by Russian air carriers, including as a marketing carrier in code-sharing or blocked-space arrangements, or for any Russian-registered aircraft, or for any non-Russian-registered aircraft which is owned or chartered, or otherwise controlled by any Russian natural or legal person, entity or body, to land in, take off from or overfly the territory of the Union. The prohibition also applies to any other aircraft which is used for a non-scheduled flight and with regard to which a Russian natural or legal person, entity or body is in a position to effectively determine the place or time of its take-off or landing.

Flights over international waters are not prohibited. The prohibition does not apply in the case of emergency landing and emergency overflight. The Regulation also provides for certain exemptions from the general ban.

Since flights over international waters are not forbidden, and flights over the EU territory can be authorised in specific cases (such as emergency landing or overflight), it is not forbidden to disseminate aeronautical information to the operators of those flights.

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https://www.easa.europa.eu/en/faq/136917