

## **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/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 EU, a Russian owned, registered or operated aircraft?**

#### **Answer**

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

#### **Last updated:**

15/03/2022

**Link:**

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

**As an ATO/DTO/organisation operating FSTDs subject to Regulation (EU) No 1178/2011 and having 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 c**

**Answer**

In principle, it is prohibited to provide technical assistance, brokering services or other 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 any natural or legal person, entity or body in Russia or for use in Russia.

The definition of “technical assistance” is set in Article 1(c) of Regulation (EU) No 833/2014, as amended by Regulation (EU) 2022/328, 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.

Training could be allowed if done for the purpose of later operating a non-Russian aircraft, i.e. if the student or candidate is e.g. destined to fly as an employee on an EU airline. If the intention is to fly in Russia or Russian controlled/registered aircraft, then such training would be support to the use of banned aircraft or operators and hence prohibited. For private pilots (who presumably would be flying themselves and are Russian citizens) such training is not allowed. Furthermore, the training cannot take place in Russia.

**Last updated:**

29/03/2022

**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) of 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 could be allowed if done for the purpose of later operating a non-Russian aircraft i.e. if the student or candidate is e.g. destined to fly as an employee on an EU airline. If the intention is to fly in Russia or Russian registered aircraft, then such tests would be support to the use of banned aircraft or operators and hence prohibited. For private pilots (who presumably would be flying themselves and are Russian citizens) such examinations or checks are not allowed. Furthermore, the skill tests, proficiency checks or assessments of competence cannot take place in Russia.

**Last updated:**

11/08/2022

**Link:**

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

**Is it allowed for Russian citizens to take theoretical knowledge examination? If it is not allowed, how to proceed with persons who have already started the examination but have not yet finished?**

**Answer**

Training, testing and checking could be allowed if done for the purpose of later operating a non-Russian aircraft i.e. if the student or candidate is e.g. destined to fly as an employee on an EU airline. If the intention is to fly in Russia or Russian registered aircraft, then such examinations would be support to the use of banned aircraft or operators and hence prohibited. For private pilots (who presumably would be flying themselves and are Russian citizens) such examinations are not allowed. Furthermore, the examination cannot take place in Russia.

**Last updated:**

11/08/2022

**Link:**

<https://www.easa.europa.eu/en/faq/136180>

**Is it allowed to issue a Part-FCL licence on the basis of a Russian licence? Is there a difference if a person is 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, including contacts with the Russian licensing authorities, which is currently not possible.

**Last updated:**

15/03/2022

**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. If the person would fly as an employee of a non-sanctioned (EU) operator, then this is permitted.

**Last updated:**

11/08/2022

**Link:**

<https://www.easa.europa.eu/en/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 833/2014 do not limit import of goods from Russia, nor the support given by the Russian manufacturer to their use in the EU. If the training is provided to persons that are not subject to the sanctions (i.e. not Russian persons or intending to operate aircraft subject to the sanctions) it may continue also, provided that the 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. If that were the case, it would limit possibility to trade with these companies.

**Last updated:**

11/08/2022

**Link:**

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

**If Ukrainian pilot wants to validate his/her licence, but getting a verification from Ukrainian CAA is limited or even impossible, what are the options for such pilot to get a Part-FCL license?**

**Answer**

Ukrainian citizens are not subject to sanctions, so normal 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 EASA Basic Regulation Article 71 to facilitate such conversions, taking also account of the possibility to mitigate any safety risks e.g. by the use of more comprehensive skill tests and interviews.

**Last updated:**

15/03/2022

**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 the licence up 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 e.g. destined to fly as an employee on an EU airline. If the intention is to fly in Russia or Russian registered aircraft, then handing over the licence would be support to the use of banned aircraft or operators and hence prohibited. For private pilots (who presumably would be flying themselves and are Russian citizens) the license should not be handed over.

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11/08/2022

**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 e.g. destined to fly as an employee on an EU airline. If the intention is to fly in Russia or Russian registered aircraft, 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. For private pilots (who presumably would be flying themselves and are Russian citizens) no EU medical certificate should be issued.

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11/08/2022

**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****Answer**

Yes. Regulation (EU) 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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11/08/2022

**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 under the scope of the common EU aviation safety legislation.

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11/08/2022

**Link:**<https://www.easa.europa.eu/en/faq/136909>**As an ATO/organisation operating FSTDs subject to Regulation (EU) No 1178/2011 and having 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 citi****Answer**

Approved training organisations and organisations operating FSTDs which have their principal place of business (PPoB) outside the EU are reminded that the privileges of their ATO approval or FSTD qualification certificate 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. 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 EU 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 onboard any aircraft under the jurisdiction of a Member State (e.g. registered in a Member State).

**Last updated:**

11/08/2022

**Link:**

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