European Union Aviation Safety Agency

Aircrew training and licensing — Restrictive measures Russia

Disclaimer:

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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).

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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.

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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.

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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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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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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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Link:

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