European Union Aviation Safety Agency

Aircraft operations — 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.

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.

Last updated:
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.

Last updated:
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).

Last updated:
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.

Last updated:
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.

Last updated:
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