

FAQ n.136156**FAQs:**

[Common Issues - Restrictive measures Russia, EU restrictive measures against Russia](#)

Question:

Is it allowed to execute contracts that have been concluded before the adoption of the sanctions (e.g. deliveries with EASA Form 1, Form 52)?

Answer:

Yes. Article 3c(5) of Regulation (EU) No 833/2014, as amended by Regulation (EU) 2022/328 allows that, with regard to the goods listed in Annex XI, namely aircraft, spacecraft, and parts thereof, the prohibitions listed in paragraphs 1 and 4 of that article, shall not apply to the execution until 28 March 2022 of contracts concluded before 26 February 2022, or ancillary contracts necessary for the execution of such contracts.

The wind down provision applies to subsections 1 and 4 only. It does not apply to paragraphs 2 and 3, which cover inter alia overhaul, repair, inspection, replacement, modification or defect rectification of an aircraft or component, with the exception of pre-flight inspection, in relation to the goods and technology listed in Annex XI, directly or indirectly, to any natural or legal person, entity or body in Russia or for use in Russia.

Provided an insurance contract was concluded before 26 February 2022, insurance services for the sale, supply, transfer or export of goods and technologies listed in Annex XI are not subject to restrictions until 28 March 2022. On the other hand, the prohibition of insurance and reinsurance in subsection 2 applies as from 26 February 2022.

Furthermore, it should be noted, that many aviation products may also be impacted by the prohibition on sale and supply of dual-use goods, as foreseen in Article 2 of the Regulation (EU) No 833/2014.

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Link:

<https://www.easa.europa.eu/en/faq/136156>