European Union Aviation Safety Agency

FAQ n.136906

FAQs:

Aircraft maintenance and continuing airworthiness — Restrictive measures Russia , EU restrictive measures against Russia

Question:

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