

Common Issues — 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 is the legal basis for the EU restrictive measures against Russia?

Answer

In the aftermath of the Russian armed attack against Ukraine on 25.02.2022, the EU Council adopted different packages of sanctions against Russia. A comprehensive description of those measures can be found on the [EU Council website](#).

The two key legislative instruments (“Sanctions Regulations”) are:

- [Regulation \(EU\) No 833/2014](#): this Regulation contains the sectorial measures such as export bans and other aviation measures such as the overflight ban.
- [Regulation \(EU\) No 269/2014](#): this Regulation contains the asset freeze and the prohibition to make any funds or economic resources available to persons and entities that are listed. Please note that individuals can be subject to an asset freeze under other Regulations. This can be checked in the [Financial Sanctions Files](#).

These legislative instruments have been amended many times since the start of the invasion of Ukraine to integrate new measures.

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Link:

<https://www.easa.europa.eu/ga/faq/136152>

What does “technical assistance” mean?

Answer

The definition of “technical assistance” is laid down in Article 1(c) of [Regulation \(EU\) No 833/2014](#), as amended by [Regulation \(EU\) 2022/328](#) of 25 February 2022, 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.

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Do the Sanctions Regulations restrict a Russian citizen holding a personnel licence issued in accordance with Regulation (EU) 2018/1139 (the “EASA Basic Regulation”) to exercise the privileges of the licence inside the EU (e.g. flying an aircraft for private purposes or for an EU airline, conducting maintenance for an EU aircraft, working in an EU Part-145 organisation, working as cabin crew in EU airlines)?

Answer

It is necessary to make a distinction between a Russian citizen who holds a personnel licence and is employed by a non-sanctioned (EU or non-EU) carrier or organisation (e.g. Part-145 organisation), and someone who either flies or maintains an aircraft that is subject to sanctions, or flies privately. Exercising the privileges of an EU personnel license by Russian citizens for the benefit of an organisation not subject to the sanctions is permitted. Private or training flights with a certain category of aircraft may also be permitted. Further details may be found in FAQs addressing the various types of personnel licenses.

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Who must comply with the provisions of Regulation (EU) No 833/2014? What about holders of dual EU-Russia citizenship?

Answer

EU sanctions create legal obligations for all EU operators, and in respect of any business conducted within the European Union. Article 13 of [Regulation \(EU\) No 833/2014](#) defines the scope of jurisdiction. Dual nationality does not release a person from EU sanctions.

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We understand that following evaluation of the terms “technical assistance” and “other services” as mentioned in the Sanctions Regulations, EASA has suspended certificates issued to organisations in Russia. Is this interpretation also applicable to approvals and certificates issued by EU Member States in the same way?

Answer

These definitions have the same meaning in all EU Member States, the Sanctions Regulations are directly applicable therein. It is the exclusive prerogative and responsibility of the Member States to assess and decide, on a case-by-case basis, on adequate actions to effectively implement the Sanctions Regulations.

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As the holder of an organisation approval (design organisation approval (DOA), production organisation approval (POA), maintenance organisation approval (MOA), continuing-airworthiness management organisation (CAMO), etc.) granted under Regulations (EU) Nos 748/2012 or 1321/2014, can I use my privileges for products, parts or appliances to be used by any natural or legal person, entity or body in Russia or for use in Russia?

Answer

No, the use of privileges granted under Regulations (EU) Nos [748/2012](#) or [1321/2014](#) is prohibited for products, parts or appliances to be used by any natural or legal person, entity or body in Russia or for use in Russia as referred to in Article 3c of [Regulation \(EU\) No 833/2014](#).

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