

Design certificates and design organisation approvals — Restrictive measures Russia

Disclaimer:

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What actions has EASA taken concerning design certificates and design organisation approvals?

Answer

EASA suspended all type certificates, European Technical Standard Order (ETSO) authorisations and design organisation approvals issued by EASA to organisations in Russia.

Last updated:

20/01/2025

Link:

<https://www.easa.europa.eu/nl/faq/136157>

Do the Sanctions Regulations supersede the continued-airworthiness obligations of the EU type certificate holders (TCHs) stemming from Regulation (EU) No 748/2012, hence, the continued airworthiness support to Russian operators and owners should be stopped?

Answer

Yes, the Sanctions Regulations supersede the continued-airworthiness support obligations of the EU TCHs and other design approval holders. In particular, with Article 3c (4)(a) of [Regulation \(EU\) No 833/2014](#), as amended by [Regulation \(EU\) 2022/328](#) of 25 February 2022,

it is prohibited to provide technical assistance or other services related to the goods and technology suited for use in aviation or the space industry, whether or not originating in the Union, and to the provision, manufacture, maintenance and use of those goods and technology, directly or indirectly, to any natural or legal person, entity or body in Russia or for use in Russia.

In addition, pursuant to Article 3c(4)(c) of Regulation (EU) No 833/2014, as amended by [Regulation \(EU\) 2023/1214](#) of 23 June 2023, it is prohibited to sell, license or transfer in any other way intellectual property rights or trade secrets as well as grant rights to access or reuse any material or information protected by means of intellectual property rights or constituting trade secrets related to the goods and technology suited for use in aviation or the space industry and to the provision, manufacture, maintenance and use of those goods and technology, directly or indirectly to any natural or legal person, entity or body in Russia or for use in Russia.

Last updated:

20/01/2025

Link:

<https://www.easa.europa.eu/nl/faq/136158>

Does the definition of “technical assistance” cover the provision of safety-related information?

Answer

Yes. 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. Thus, the definition covers also the provision of safety-related information. It is the operators’ responsibility not to operate an aircraft if its state of safety is uncertain.

Last updated:

20/01/2025

Link:

<https://www.easa.europa.eu/nl/faq/136159>

Am I allowed to send any type of technical information, including safety

information related to the design, to my customer in Russia, or maintain my Russian customer's access to my dedicated IT system for such information (e.g. service bulletins, manuals)?

Answer

No, the provision of technical information, including safety information related to the design, is considered technical assistance to manufacture, maintenance and/or use of an aircraft under the sanctions. Please refer to the definition of “technical assistance” laid down in Article 1(c) of Regulation (EU) No 833/2014, as amended by Regulation (EU) 2022/328. Only information accessible to the public (e.g. [EASA Safety Publications Tool](#) — [Airworthiness Directives](#)) remains accessible to Russian customers.

In addition, pursuant to Article 3c(4)(c) of [Regulation \(EU\) No 833/2014](#), as amended by [Regulation \(EU\) 2023/1214](#) of 23 June 2023, it is prohibited to sell, license or transfer in any other way intellectual property rights or trade secrets as well as grant rights to access or reuse any material or information protected by means of intellectual property rights or constituting trade secrets related to the goods and technology suited for use in aviation or the space industry and to the provision, manufacture, maintenance and use of those goods and technology, directly or indirectly to any natural or legal person, entity or body in Russia or for use in Russia.

Last updated:

20/01/2025

Link:

<https://www.easa.europa.eu/nl/faq/136160>

Are EU organisations permitted to answer questions received from the Russian Federal Air Transport Agency (FATA) about ongoing validation of modifications?

Answer

No. Providing answers to the questions would constitute technical assistance to FATA, which is prohibited by the EU sanctions.

Last updated:

20/01/2025

Link:

<https://www.easa.europa.eu/nl/faq/136162>

Will EASA issue flight condition to Russian products issued with an EASA type certificate?

Answer

No, as that is considered technical assistance prohibited by the sanctions. Please refer to the definition of “technical assistance” laid down in Article 1(c) of [Regulation \(EU\) No 833/2014](#), as amended by [Regulation \(EU\) 2022/328](#) of 25 February 2022.

Last updated:

20/01/2025

Link:

<https://www.easa.europa.eu/nl/faq/136163>

Can a holder of a design organisation approval (DOA) apply to EASA for a supplemental type certificate (STC) or other design approval (e.g. minor change) for a product, part or non-installed equipment that is to be installed on an aircraft operated by a Russian operator?

Answer

No. Design approvals for an aircraft operated by a Russian operator fall within the scope of the Sanctions Regulations. Therefore, EASA will not accept such applications.

Last updated:

20/01/2025

Link:

<https://www.easa.europa.eu/nl/faq/136290>

Can a holder of a design organisation approval (DOA) issue design approvals under its privileges, which are to be used on an aircraft operated by a Russian operator?

Answer

No. Design approvals for an aircraft operated by a Russian operator fall within the scope of the Sanctions Regulations. Therefore, no such approval is allowed to be issued under the DOA

privileges.

Last updated:

20/01/2025

Link:

<https://www.easa.europa.eu/nl/faq/136291>

EASA suspended aircraft type certificates issued to organisations in Russia. Can the individual aircraft of these types that is registered in EU Member States continue to be operated by EU operators?

Answer

The consequence of the suspension of the aircraft type certificate is that the Certificate of Airworthiness (CoA) for the individual aircraft of these type that is registered in the Member States loses its validity.

If the affected aircraft have been operated for military, customs, police search and rescue, firefighting, border control, coastguard or similar activities or services, these aircraft are not regulated by Article 2(3)(a) of [Regulation \(EU\) 2018/1139](#) (the “EASA Basic Regulation”) and are subject to national law, unless the Member State decided under Article 2(6) of the Basic Regulation to apply the EU aviation safety legislation, among others, for the airworthiness of the aircraft. Therefore, it is for the State of Registry to determine the certification, continuing-airworthiness, and operational basis for aircraft that are used for activities and services listed in Article 2(3)(a) of the Basic Regulation.

If the affected aircraft have been operated in accordance with the Basic Regulation, then these operations may continue either under a permit to fly to the extent permitted by [Regulation \(EU\) No 748/2012](#), or through the issuance by the State of Operator of temporary exemptions under Article 71 of the Basic Regulation. Member States are advised to contact EASA prior to issuing such exemptions. Please note that under the Basic Regulation, it is not possible for EASA to issue specific airworthiness specifications (SASs) any longer.

It is the exclusive prerogative and responsibility of the Member States to assess and decide, on a case-by-case basis, on the possibility to use these aircraft, subject to either EU or national law, in view of the restrictive measures of the Sanctions Regulations and ensuring the principal objective of civil aviation safety.

Last updated:

20/01/2025

Link:

<https://www.easa.europa.eu/nl/faq/136292>

Will EASA continue to monitor, and eventually adopt Russian Federal Air Transport Agency (FATA) Airworthiness Directives (ADs) for Russian aircraft types whose type certificate (TC) was suspended by EASA?**Answer**

Regarding mandatory continuing-airworthiness information, EASA will continue to monitor the ADs issued by FATA on the six Russian aircraft types whose TCs were suspended by EASA and may adopt certain FATA ADs affecting types validated by EASA, even though the TC has been suspended.

Last updated:

20/01/2025

Link:

<https://www.easa.europa.eu/nl/faq/136293>

Will Airworthiness Directives (ADs) issued by EASA to Russian aircraft types that were recently suspended remain valid?**Answer**

Yes. These ADs remain valid and publicly available in the [EASA Safety Publication Tool](#).

Last updated:

20/01/2025

Link:

<https://www.easa.europa.eu/nl/faq/136294>

My organisation is holder of a type certificate (TC) issued by EASA and a Russian operator of my product reported an occurrence to us. Are we allowed to have an exchange with the Russian operator to investigate the reported occurrence?**Answer**

The sanctions do not prohibit that technical information is received by EASA TC holders (or

other EASA design approval holders) from organisations or operators located in Russia. Therefore, EASA TC holders are not prevented from receiving or requesting information from a Russian operator of their product with a view to investigating an occurrence and evaluating the related safety issues. However, the EASA TC holder should ensure that during those exchanges no technical data or information (including those related to the type design), instruction, advice, working knowledge, skills or consulting services, etc. are provided by that TC holder to the Russian operator, as that would be considered provision of technical assistance related to goods and technology, which is forbidden by the sanctions.

Last updated:

20/01/2025

Link:<https://www.easa.europa.eu/nl/faq/136161>