

## EU restrictive measures against Russia

For more information, please see ['Restrictive measures – Russia's military attack on Ukraine'](#).

### *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.*

## Common Issues - Restrictive measures Russia

### **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 website of the EU Council <https://www.consilium.europa.eu/en/policies/sanctions/restrictive-measures-ukraine-crisis/>

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

- Council Regulation (EU) 833/2014: this regulation contains the sectorial measures such as export bans and other aviation measures such as the overflight ban
- Council Regulation (EU) 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 individuals can be subject to an asset freeze under other Regulations. This can be checked in the Financial Sanctions Files: <https://webgate.ec.europa.eu/fsd/fsf#!/files>

These legislative instruments have been amended many times since the start of the

invasion of Ukraine to integrate the new measures. This is done via the so-called “packages”. With respect to aviation the following two packages are most relevant:

- Package no. 1 consisting of: (a) Council Decision (CFSP) 2022/327, amending Council Decision 2014/512/CFSP, and (b) Council Regulation (EU) 2022/328, amending Council Regulation (EU) No 833/2014. Both amending acts were published in the OJ L 49 of 25.02.2022 and contain a comprehensive export ban on goods and technology, including in the aviation sector.
- Package no. 2 consisting of: (a) Council Regulation (EU) 2022/334, also amending Council Regulation (EU) 833/2014, and (b) Council Decision (CFSP) 2022/335, which amends again Decision 2014/512/CFSP. These amending acts were published in the OJ L 77 of 28.02.2022 and in particular ban any Russian air carriers from flying into, over or out of the territory of the European Union.

In addition, Council Regulation (EU) 269/2014 has been amended multiple times by adding new persons and entities to the list of persons, entities, and bodies subject to restrictive measures which have been set out in Annex I to that Regulation.

**Last updated:**

11/08/2022

**Link:**

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

**What does “technical assistance” mean?****Answer**

The definition of “technical assistance” is set in Article 1(c) of Regulation (EU) No 833/2014, as amended by Regulation (EU) 2022/328, 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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15/03/2022

**Link:**

<https://www.easa.europa.eu/en/faq/136153>

## **Do the Sanction Regulations restrict a Russian citizen holding a personnel licence issued in accordance with Regulation (EU) 2018/1139 to exercise the privileges of the licence inside the EU (e.g. flying an aircraft for private purposes or for an EU airli**

### **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. Further details may be found in FAQs addressing the various types of personnel licenses.

### **Last updated:**

11/08/2022

### **Link:**

<https://www.easa.europa.eu/en/faq/136154>

## **Who must comply with the provisions of the Regulation? 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 EU. Article 13 of the Regulation defines the scope of jurisdiction. Dual nationality does not release a person from EU sanctions.

### **Last updated:**

11/08/2022

### **Link:**

<https://www.easa.europa.eu/en/faq/136155>

## **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.

### Last updated:

11/08/2022

### Link:

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

**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 t**

### 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.

**Last updated:**

29/03/2022

**Link:**<https://www.easa.europa.eu/en/faq/136289>

**As the holder of an organisation approval (DOA, POA, MOA, CAMO, etc) granted under Regulations (EU) 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**

**Answer**

No, the use of privileges granted under Regulations (EU) 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.

**Last updated:**

11/08/2022

**Link:**<https://www.easa.europa.eu/en/faq/136905>

## **Design certificates and design organisation approvals - Restrictive measures Russia**

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

**Answer**

EASA suspended all type certificate, ETSO authorisations and design organisation approvals issued by EASA to organisations in Russia.

**Last updated:**

15/03/2022

**Link:**<https://www.easa.europa.eu/en/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 (CAW) support to Russian operators and owners should be s****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 Council 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 the Russia or for use in Russian.

**Last updated:**

11/08/2022

**Link:**<https://www.easa.europa.eu/en/faq/136158>**Does the definition of “technical assistance” cover the provision of safety-related information?****Answer**

Yes. The definition of “technical assistance” is set in Article 1(c) of Regulation (EU) No 833/2014, as amended by Regulation (EU) 2022/328, 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 provision of safety related information. It is the operators' responsibility not to operate an aircraft if its state of safety is uncertain.

**Last updated:**

15/03/2022

**Link:**<https://www.easa.europa.eu/en/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, manual**

**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" set 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 Directive website) remains accessible to Russian customers.

**Last updated:**

11/08/2022

**Link:**<https://www.easa.europa.eu/en/faq/136160>

**Are EU organisations permitted to answer questions received from FATA about on-going 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:**

15/03/2022

**Link:**<https://www.easa.europa.eu/en/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” set in Article 1(c) of Regulation (EU) No 833/2014, as amended by Regulation (EU) 2022/328.

**Last updated:**

15/03/2022

**Link:**<https://www.easa.europa.eu/en/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****Answer**

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

**Last updated:**

29/03/2022

**Link:**<https://www.easa.europa.eu/en/faq/136290>**Can a holder of a design organisation approval (DOA) issue**

## **design approvals under its privileges, that is to be used on an aircraft operated by a Russian operator?**

### **Answer**

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

### **Last updated:**

29/03/2022

### **Link:**

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

## **EASA suspended aircraft type certificates issued to organisations in Russia. Can the individual aircraft of these types 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 for individual aircraft of these type registered in the Member States lost their 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 the Basic Regulation (Article 2 paragraph 3(a) refers) 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 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 specification (SAS) 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 under 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:**

29/03/2022

**Link:**

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

**Will EASA continue to monitor, and eventually adopt FATA Airworthiness Directives for Russian types whose type certificate was suspended by EASA?**

**Answer**

Regarding mandatory continuing airworthiness information, EASA will continue to monitor the Airworthiness Directives (ADs) issued by FATA on the six Russian aircraft types the type certificate of which were suspended by EASA and may adopt certain FATA ADs affecting types validated by EASA, even though the type certificate has been suspended.

**Last updated:**

29/03/2022

**Link:**

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

**Will ADs issued by EASA to Russian types that were recently suspended remain valid?**

**Answer**

Yes. These ADs remain valid and publicly available in the EASA Safety Publication Tool.

**Last updated:**

29/03/2022

**Link:**<https://www.easa.europa.eu/en/faq/136294>

**My organisation is holder of a type certificate 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 type certificate holders (or other EASA design approval holders) from organisations or operators located in Russia. Therefore, EASA type certificate 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 type certificate holder should ensure that during those exchanges no technical data or information (including those related to the type design), instruction, advice, working knowledge or skills or consulting services, etc., are provided by that type certificate 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:**

05/04/2022

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

## **Production organisations - Restrictive measures Russia**

**As the holder of a Production Organisation Approval (POA) granted under EU regulation 748/2012 Annex I (regardless of my Principal Place of Business), can I release engines, propellers, parts or appliances with an EASA Form 1 to a**

## customer in Russia, or f

### Answer

In accordance with Article 3c(1) and 3c (4)(a) of Regulation (EU) No 833/2014, as amended by Council Regulation (EU) 2022/328 of 25 February 2022, it is prohibited to sell, supply, transfer or export aeronautical goods listed in Annex XI, or 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.

Accordingly, holders of a POA granted under EU regulation 748/2012 Annex I (regardless of the Principal Place of Business) are forbidden to release engines, propellers, parts or appliances with an EASA Form 1 to a customer, broker, vendor, natural or legal person, entity or body known to be located in Russia or to be used in Russia.

### Last updated:

11/08/2022

### Link:

<https://www.easa.europa.eu/en/faq/136164>

**As the holder of a POA granted under EU regulation 748/2012 Annex I (regardless of my Principal Place of Business), can I have approved or unapproved location(s) in Russia from where I exercise my privileges granted under 21.A.163?**

### Answer

In accordance with Article 3c (4)(a) of Regulation (EU) No 833/2014, as amended by Council 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 known to be used in Russia.

Accordingly, holders of a POA granted under EU regulation 748/2012 Annex I

(regardless of their Principal Place of Business) are forbidden to exercise their privileges from an approved or unapproved location in Russia.

**Last updated:**

15/03/2022

**Link:**

<https://www.easa.europa.eu/en/faq/136165>

**As the holder of a POA granted under EU regulation 748/2012 Annex I (regardless of my Principal Place of Business), can I issue the EASA Form 52 (Aircraft Statement of Conformity) or the EASA Form 53 (Certificate of Release to Service) for an aircraft reg**

**Answer**

In accordance with Article 3c (4)(a) of Regulation (EU) No 833/2014, as amended by Council 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.

Accordingly, holders of a POA granted under EU regulation 748/2012 Annex I (regardless of their Principal Place of Business) are forbidden to exercise their privileges on an aircraft registered in Russia, owned by a Russian natural or legal person, entity or body, or to be operated in Russia.

**Last updated:**

15/03/2022

**Link:**

<https://www.easa.europa.eu/en/faq/136166>

**As the holder of a POA granted under EU regulation 748/2012 Annex I (regardless of my Principal Place of Business), can I issue a Permit to Fly for an aircraft registered in Russia, owned by a Russian entity, or to be operated in Russia?**

**Answer**

In accordance with Article 3c (4)(a) of Regulation (EU) No 833/2014, as amended by Council 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.

Accordingly, holders of a POA granted under EU regulation 748/2012 Annex I (regardless of their Principal Place of Business) are forbidden to exercise their privileges on an aircraft registered in Russia, owned by a Russian natural or legal person, entity or body, or to be operated in Russia.

However, for an aircraft registered in the EU, operated within the EU airspace by an EU operator and owned by an EU entity regardless of its livery and end-customer, issuing a Permit to Fly for the purpose of completing the manufacturing cycle and/or re-allocating customer would not be forbidden by the existing EU sanctions on Russia.

**Last updated:**

15/03/2022

**Link:**<https://www.easa.europa.eu/en/faq/136167>

## **Aircraft maintenance and continuing airworthiness - Restrictive measures Russia**

### **What actions has EASA taken in the domain of aircraft maintenance?**

**Answer**

EASA has suspended all Part-145 and CAMO approvals issued by EASA to organisations in Russia.

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15/03/2022

**Link:**

<https://www.easa.europa.eu/en/faq/136168>

**As an organisation approved in accordance with Regulation (EU) 1321/2014, am I allowed to provide maintenance services to Russian operated\*, registered, or owned aircraft which is for use in Russia, including engines, components and parts thereof?**

**Answer**

*\*Operated by a natural person which is a resident of Russia, or any legal person, entity or body established in Russia.*

According to Article 3c of Regulation (EU) No 833/2014, as amended by Regulation (EU) 2022/328, such aircraft cannot benefit from services regulated under Regulation (EU) 1321/2014 as detailed in the following:

Under Article 3c(4), it is prohibited to provide:

(i) technical assistance (which includes any technical support related to maintenance per Article 1(c)) related to the goods and technology in the Annex; and

(ii) maintenance 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, the following terms should be understood as:

(i) “Any natural or legal person, entity or body in Russia” should be understood as covering any natural person which is a resident of Russia, and any legal person, entity or body established in Russia, independently of their citizenship/ownership. A contrario, the expression does not cover Russian citizens or Russian owned companies which are not resident in Russia/established in Russia.

(ii) “For use in Russia” should be understood as covering the sale/supply/transfer/export of goods/services which would be used in Russia, including operations between two points in Russia.

1. Scope of application of Article 3c in relation to **maintenance/repair**

In light of the above:

**It is prohibited**, under Article 3c, to provide repair /maintenance services to:

- any aircraft operated by a Russian air carrier, as Russian air carriers are companies incorporated in Russia, hence fall in the scope of “natural or legal persons, entities or bodies in Russia”;
- any aircraft owned by a person which is a resident of Russia, or by a company established in Russia, independently of their citizenship/ownership, as such persons/companies also fall in the scope of “natural or legal persons, entities or bodies in Russia”;
- any aircraft, independently of its ownership, which is being used or will be used for providing air transport services between points inside Russia (whether in connection or not with an international service).

For the sake of clarification, this prohibition applies also if the abovementioned aircraft is grounded in the EU.

**It is not prohibited**, under Article 3c, to provide repair /maintenance to:

- aircraft which is owned by a natural person which resides outside of Russia, or by a company established outside of Russia, even if the natural person has Russian citizenship or that the company is Russian owned, unless the aircraft is being used or will be used for providing air transport services between points inside Russia (whether in connection or not with an international service).

When an aircraft is owned by a natural or legal person, entity or body in Russia, and is leased to a non-Russian airline/company, it can be repaired/maintained if the leasing contract imposes on the lessee the obligation to maintain that aircraft.

## 2. The scope of application of Article 3c in relation to **technical assistance**

The term “technical assistance” is defined in Article 1(c) of Regulation (EU) No 833/2014, as amended by Regulation (EU) 2022/328, as “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”.

In light of that definition, and of the above clarification of the meaning of “natural or legal persons, entities or bodies in Russia” and “for use in Russia”:

It is **prohibited**, under Article 3c, to provide technical assistance (which includes any technical support related to maintenance) related to the aviation goods and technology to:

- any Russian air carrier;
- any natural person which is a resident of Russia, or any company established in Russia, independently of their citizenship/ownership;
- a natural person or company established outside Russia, independently of their citizenship/ownership, where that person will make use of the received assistance/services in Russia, or will use the assistance/service received to provide assistance/services to an aircraft/parts/components used in Russia, including between points inside Russia (whether in connection or not with an international service).

The above prohibition applies independently of whether the assistance/service is physically provided in the territory of the Union or outside.

It is **not prohibited**, under Article 3c, to provide technical assistance (including maintenance) services related to the aviation goods and technology and to the provision, manufacture, maintenance and use of those goods and technology, directly or indirectly, to:

- a natural person which resides outside of Russia, or to a company established outside of Russia, even if that natural person has Russian citizenship or that company is Russian owned, unless that natural person or company would make use of the received assistance/services in Russia, or use the assistance/service received to provide assistance/services to an aircraft/parts/components used in Russia, including between points inside Russia (whether in connection or not with an international service).

Furthermore, maintenance organisations are also reminded that the privileges of their EU approval are granted to ensure continuing airworthiness of aircraft, including any component for installation thereto, subject to Regulation (EU) No 1321/2014.

Finally, please see also FAQ [#136906](#) for the situation where the asset freeze list contained in Annex I of Regulation 269/2014 applies.

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11/08/2022

**Link:**

<https://www.easa.europa.eu/en/faq/136169>

**Is it allowed for a maintenance organisation to provide**

## **maintenance services to Russian aircraft subject to the sanctions, including engines, components and parts thereof, to facilitate their storage while they are banned from operating in the EU airspace**

### **Answer**

Maintenance organisations are not prevented from, e.g. towing the sanctioned aircraft to a parking position where it can be stored out of the way and from fixing any leaks etc. to avoid environmental problems, but measures to retain or improve the value or airworthiness of sanctioned aircraft intended for use in Russia, are not as such allowed. For guidance on the interpretation of the restrictive measures affecting aircraft maintenance services, please consult FAQ [#136169](#).

However, maintenance service can be made available for aircraft, including engines, components and parts thereof, owned by EU leasing companies, which are being returned from Russian operators, because at that point they are no longer operated by the Russian operator. The EU leasing company has taken control of the aircraft, engine, component, or part and may return it to a location outside Russia.

Please see however question FAQ [#136906](#) for the situation where the asset freeze list contained in Annex I of Regulation 269/2014 applies.

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11/08/2022

### **Link:**

<https://www.easa.europa.eu/en/faq/136170>

## **Is it allowed for an EU maintenance organisation to perform maintenance in Russia in accordance with Regulation (EU) 1321/2014 on EU registered aircraft in order for them to meet the airworthiness requirements necessary for the return flight or in order t**

### **Answer**

Yes, assuming the aircraft is not in Russian register and has been returned to the lessor's control. This is allowed because once the aircraft has been returned to the (non-Russian) lessor it is no longer chartered, leased or otherwise controlled by a

Russian person per Article 3d of Regulation 833/2014.

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**Link:**

<https://www.easa.europa.eu/en/faq/136171>

**Is it allowed for a maintenance organisation approved by EASA under Part-145 to perform maintenance on components and provide such components to a non-EU, non-Russian operator, if this operator operates the aircraft to Russia?**

**Answer**

Yes, if this aircraft is not being used to fly domestically in Russia, or to otherwise circumvent the sanctions (N.B. Article 12 prohibits any measures that would result in circumventing the sanctions).

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11/08/2022

**Link:**

<https://www.easa.europa.eu/en/faq/136172>

**Can maintenance services be provided to aircraft operated by an EU operator which 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 the allowability 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 the operation in the EU of aircraft operated by Russian air carriers, any Russian registered aircraft, and of any non-Russian-registered aircraft which are owned or chartered, or otherwise controlled by any Russian natural or legal person, entity or body. Hence, such aircraft 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 EU but be prohibited from flying.

\*This can be checked in the Financial Sanctions Files:

<https://webgate.ec.europa.eu/fsd/fsf#!/files>

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11/08/2022

**Link:**

<https://www.easa.europa.eu/en/faq/136906>

**EASA suspended certain type certificates (TCs) issued to holders in Russia in accordance with the Sanctions Regulations. A maintenance organisation has one of those TC on its approval. As the competent authority for such maintenance organisation, do we ha**

**Answer**

No, the approval certificate does not need to be changed to remove the suspended TC from the privileges of the organisation. The organisations should not perform and certify maintenance on an aircraft type the TC of which has been suspended (per Article 3c(4)), but the privileges of the approval certificate remain unaffected.

**Last updated:**

11/08/2022

**Link:**

<https://www.easa.europa.eu/en/faq/136907>

**Training and licensing of maintenance personnel**

## **- Restrictive measures Russia**

### **What actions has EASA taken concerning training of maintenance personnel?**

#### **Answer**

EASA suspended all Part-147 organisation approvals issued by EASA to organisations in Russia.

#### **Last updated:**

15/03/2022

#### **Link:**

<https://www.easa.europa.eu/en/faq/136173>

### **I am an EU national and holder of a Part-66 licence. Am I allowed to work, either within or outside the EU, on Russian owned or operated aircraft?**

#### **Answer**

No. The personal scope of Regulation (EU) no 833/2014 covers any person inside or outside the territory of the Union who is a national of a Member State.

#### **Last updated:**

15/03/2022

#### **Link:**

<https://www.easa.europa.eu/en/faq/136174>

### **The Sukhoi Superjet type certificate is suspended by EASA. In the Member States there are Part-66 licences containing this type rating. Does the competent authority need to suspend this rating in those maintenance licences?**

#### **Answer**

No. It is the maintenance activity that is prohibited by the EU sanctions, but the privilege of the Part-66 licences remains unaffected.

**Last updated:**

15/03/2022

**Link:**<https://www.easa.europa.eu/en/faq/136175>

**As an organisation approved by a Member State in accordance with Annex IV (Part-147) of Regulation (EU) 1321/2014 and my principal place of business is within the territory of the EU, am I allowed to provide training to Russian citizens?**

**Answer**

In principle, it is prohibited to provide technical assistance related to maintenance, directly or indirectly to any natural or legal person, entity or body in Russia or for use in Russia (ref. Art. 3(4)(a) of Regulation (EU) 833/2014). Training of maintenance personnel could be allowed if done for the purpose of later working for a maintenance organisation subject to Regulation (EU) 1321/2014 outside Russia. If the purpose of the training is to work in Russia or on Russian aircraft subject to the restrictive measures, such training provision is prohibited. Furthermore, the training cannot take place in Russia.

**Last updated:**

29/03/2022

**Link:**<https://www.easa.europa.eu/en/faq/136295>

**As competent authority of an EU Member State, am I allowed to issue Part-66 licence to a Russian national?**

**Answer**

Yes, provided that the candidate is or due to be working for a maintenance organisation subject to Regulation (EU) 1321/2014 outside of Russia.

**Last updated:**

11/08/2022

**Link:**

<https://www.easa.europa.eu/en/faq/136296>

## **Aircrew training and licensing - Restrictive measures Russia**

### **What actions has EASA taken in the domain of pilot licensing?**

#### **Answer**

EASA has suspended all flight simulation training device (FSTD) qualification certificates issued by EASA to organisations in Russia.

#### **Last updated:**

15/03/2022

#### **Link:**

<https://www.easa.europa.eu/en/faq/136176>

### **I am an EU national and holder of a pilot licence issued in accordance with Annex I (Part-FCL) to Regulation (EU) No 1178/2011. Am I allowed to fly, either within or outside the European Union, a Russian-owned, -registered or -operated aircraft?**

#### **Answer**

No. The personal scope of Regulation (EU) No 833/2014 includes any person inside or outside the territory of the European Union who is a national of a Member State.

#### **Last updated:**

08/03/2024

#### **Link:**

<https://www.easa.europa.eu/en/faq/136177>

### **As an approved training organisation (ATO) / declared training organisation (DTO) / organisation operating flight simulation training devices (FSTDs) subject to Regulation (EU) No 1178/2011 and my having principal place of business within the**

## EU territory

### Answer

Training, testing and checking of Russian citizens is allowed if done for the purpose of operating a non-Russian-registered aircraft that is NOT owned or chartered<sup>(2)</sup>, or otherwise controlled<sup>(1)</sup> by any Russian natural or legal person, entity or body.

If the intention of the applicant is to fly in Russia, at a Russian air carrier or Russian-registered aircraft or any non-Russian-registered aircraft that is owned or chartered, or otherwise controlled by any Russian natural or legal person, entity or body, then such training, testing or checking is prohibited. Furthermore, the training, testing or checking cannot take place in Russia (c.f. Articles 3c(1) and 3d(1) of Regulation (EU) No 833/2014).

*Note 1: 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'. 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/136178>

**I am a holder of an examiner certificate issued in accordance with Annex I (Part-FCL) to Regulation (EU) No 1178/2011. Am I allowed to conduct skill tests, proficiency checks or assessments of competences to Russian license holders or to Russian nationals**

### Answer

Training, testing and checking of Russian citizens is allowed if done for the purpose of operating a non-Russian-registered aircraft that is NOT owned or chartered<sup>(2)</sup> or otherwise controlled<sup>(1)</sup> by any Russian natural or legal person, entity or body.

If the intention of the applicant is to fly in Russia, at a Russian air carrier or Russian-registered aircraft or any non-Russian-registered aircraft that is owned or chartered or otherwise controlled by any Russian natural or legal person, entity or body, then such training, testing or checking is prohibited. Furthermore, the training, testing or checking cannot take place in Russia (c.f. Articles 3c(1) and 3d(1) of Regulation (EU) No 833/2014).

*Note 1: 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'. 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/136179>

## **As a Russian citizen, am I allowed to go through theoretical or practical training, either in an aircraft or flight simulation training device (FSTD), or take examinations, skill tests or proficiency checks in accordance with Regulation (EU) No 1178/2011?**

### **Answer**

Training, testing and checking of Russian citizens is allowed if done for the purpose of operating a non-Russian-registered aircraft that is NOT owned or chartered<sup>(2)</sup> or otherwise controlled<sup>(1)</sup> by any Russian natural or legal person, entity or body.

If the intention of the applicant is to fly in Russia, at a Russian air carrier or Russian-registered aircraft or any non-Russian-registered aircraft that is owned or chartered or otherwise controlled by any Russian natural or legal person, entity or body, then such training, testing or checking is prohibited. Furthermore, the training, testing or checking cannot take place in Russia (c.f. Articles 3c(1) and 3d(1) of Regulation (EU) No 833/2014).

*Note 1: The concept of 'control' is understood in the 'economic' or 'financial' sense*

and not in the 'technical' or 'operational' sense (cf. para 48 [Judgement of the General Court Case T-233/22](#)).

*Note 2: The EU aviation law does not define 'aircraft charter'. 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/139493>

**Is it allowed to issue a Part-FCL licence on the basis of a Russian licence (i.e. conversion)? Is there a difference if a person is a Russian citizen or not? If not, what to do with persons who have already started the process?**

**Answer**

Such licence issue would necessitate some training, testing and checking, which may be permitted, see [dedicated FAQ](#). However, competent authorities are reminded that licence conversion may necessitate contacting the Russian licensing authorities, which is currently not feasible.

**Last updated:**

08/03/2024

**Link:**

<https://www.easa.europa.eu/en/faq/136181>

**Is it allowed to issue a validation of a pilot licence to a Russian citizen, for example if the pilot flies for an EU-based company?**

**Answer**

The same restrictions as for other training, testing and checking activities should apply here. However, competent authorities are reminded that licence validation may necessitate contacting the Russian licensing authorities, which is currently not feasible.

**Last updated:**

**Last updated:**

08/03/2024

**Link:**<https://www.easa.europa.eu/en/faq/136182>**If a training organisation subject to Regulation (EU) No 1178/2011 operates a simulator manufactured by a Russian manufacturer and simulating Russian aircraft, is it affected by the sanctions?****Answer**

The sanctions covered by Regulation (EU) No 833/2014 do not limit the import of aircraft simulators from Russia, nor the support given by the Russian manufacturer to their use in the European Union. If the training is provided to persons that are not subject to the sanctions (i.e. persons not intending to operate aircraft subject to the sanctions), it may continue, provided that the flight simulator training device (FSTD) operator is able to continue to maintain its qualification certificate.

However, this answer is without prejudice to the possibility that these companies are owned or otherwise controlled by a person or entities subject to an asset freeze or prohibition of transactions. If that were the case, it would limit the possibility to trade with these companies.

**Last updated:**

08/03/2024

**Link:**<https://www.easa.europa.eu/en/faq/136183>**If a Ukrainian pilot wants to validate/convert their licence, but obtaining a verification from the Ukrainian Civil Aviation Authority (CAA) is limited or even impossible, what are the options for such pilot to obtain a Part-FCL license?****Answer**

In respect of Ukraine, normal aviation rules (i.e. Regulation (EU) 2020/723) apply. Under the current circumstances, it is understandable that the Ukrainian CAA may

not be able to provide normal service for verifications. Therefore, Member States might consider, for example, using the flexibility provided by Article 71 of the EASA Basic Regulation (Regulation (EU) 2018/1139), to facilitate such licence conversions or validation, taking also account of the possibility to mitigate any safety risks, e.g. by using more comprehensive skill tests and interviews.

**Last updated:**

08/03/2024

**Link:**<https://www.easa.europa.eu/en/faq/136184>**If a Russian citizen has been issued with a Part-FCL licence but the person has not picked up the licence from the licensing authority yet, is it allowed to hand over the licence?****Answer**

Yes, provided that the purpose of the license is to operate a non-Russian aircraft, i.e. if the person is, for example, destined to fly as an employee on an EU airline or as a private pilot. If the intention is to fly in Russia, at a Russian air carrier or Russian-registered aircraft or any non-Russian-registered aircraft that is owned or chartered or otherwise controlled by any Russian natural or legal person, entity or body then handing over the licence would be support to the use of banned aircraft or operators and hence prohibited.

*Note 1: 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'. 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/136297>**Can Russian citizens apply for an EU medical certificate issued**

## in accordance with Regulation (EU) No 1178/2011?

### Answer

Yes, provided that the purpose of the medical certificate is to operate a non-Russian aircraft, i.e. if the person is, for example, destined to fly as an employee on an EU airline or as a private pilot. If the intention is to fly in Russia or Russian-registered aircraft or any non-Russian-registered aircraft that is owned or chartered<sup>(2)</sup> or otherwise controlled<sup>(1)</sup> by any Russian natural or legal person, entity or body, then the person cannot be issued with an EU medical certificate as that would be support to the use of banned aircraft or operators and hence prohibited.

*Note 1: 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'. 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/136298>

## **Do the same principles apply to balloon and sailplane pilot training, testing and checking (e.g. Russian citizens, training sites, etc.) in accordance with Regulations (EU) 2018/395 and (EU) 2018/1976 as to training, testing and checking in accordance wit**

### Answer

Yes. Regulation (EU) No 833/2014 does not differentiate between the different types of aircraft. Therefore, balloon and sailplane pilot licensing should be treated in the same manner as pilot licensing for any other aircraft.

### Last updated:

08/03/2024

**Link:**

<https://www.easa.europa.eu/en/faq/136908>

**Are EU sanctions also applicable to pilot training, testing and checking for aircraft listed in Annex I to Regulation (EU) 2018/1139 ('EASA Basic Regulation'), such as microlights?**

**Answer**

Yes. Since the scope of the Sanctions Regulations is much broader than that of the EASA Basic Regulation, the Sanctions Regulations apply to pilot training, testing and checking for all types of aircraft, even if they do not fall within the scope of the common EU aviation safety legislation.

**Last updated:**

08/03/2024

**Link:**

<https://www.easa.europa.eu/en/faq/136909>

**As an approved training organisation (ATO) / organisation operating flight simulation training devices (FSTDs) subject to Regulation (EU) No 1178/2011 and having principal place of business outside the EU territory, am I allowed to provide either theoretical**

**Answer**

ATOs and organisations operating FSTDs that have their principal place of business (PPoB) outside the European Union are reminded that the privileges of their ATO approval or FSTD qualification certificate are to provide training, or to use the device for the purpose of obtaining a pilot licence, rating or certificate in accordance with Regulation (EU) No 1178/2011. When receiving requests from Russian citizens, these organisations should first verify whether it would be possible for a Member State to issue licences to these applicants, after completion of the training, testing or checking. EU Member States have certain restrictions in terms of issuing licenses to Russian citizens.

Furthermore, these organisations are also reminded that their training sites or FSTDs located within the territory of the European Union are fully subject to the

restrictions of the Sanctions Regulations, hence they should apply the same principles as the organisations having their PPOB in the Member States. Therefore, please also consult the FAQs relevant to EU organisations.

Finally, as regards practical training, organisations should keep in mind that the Sanctions Regulations also apply on board any aircraft under the jurisdiction of a Member State (e.g. registered in a Member State).

**Last updated:**

08/03/2024

**Link:**

<https://www.easa.europa.eu/en/faq/136910>

## **Aircraft operations - Restrictive measures**

### **Russia**

#### **Are aircraft registered in Russia or operated by Russian operators allowed to fly into the European Union?**

**Answer**

No, except in case of some limited exceptions. In accordance with Regulation (EU) No 833/2014, it is prohibited for 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 that is owned or chartered<sup>(2)</sup> or otherwise controlled<sup>(1)</sup> by any Russian natural or legal person, entity or body, to land in, take off from or overfly the territory of the European Union, except in case of an emergency landing or emergency overflight.

*Note 1: 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'. 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/136185>

**Regulation (EU) No 833/2014 prohibits any non-Russian-registered aircraft that is owned or chartered or otherwise controlled by any Russian natural to land in, take off from or overfly the territory of the European Union, except in case of an emergency la**

**Answer**

As Russian natural person should be understood any person with Russian nationality, regardless of whether that person also possesses another nationality, citizenship(s) or has permanent residency in the European Union.

**Last updated:**

08/03/2024

**Link:**

<https://www.easa.europa.eu/en/faq/136186>

**If an aircraft is chartered by an EU or third-country resident, but the flight is from Russia to the European Union, is it allowed? Alternatively, if at least one of the passengers is a Russian citizen (not subject to targeted sanctions, such as a travel**

**Answer**

Landing in or taking off from the European Union is allowed only if:

1. the aircraft is not operated by a Russian air carrier;
2. the aircraft is not registered in Russia;
3. the aircraft is not owned or chartered<sup>(2)</sup> or otherwise controlled<sup>(1)</sup> by any Russian natural or legal person, entity or body; and
4. there are no persons on board the aircraft who are subject to a listing under the Sanctions Regulations (in particular, subject to a travel ban).

In line with Article 3d(1) of Regulation (EU) No 833/2014, it shall be prohibited for

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 that 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 European Union.

Therefore, it should be noted that the Regulation does not forbid to take Russian citizens on board, however, the aircraft cannot be chartered by Russian citizens. 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 authority to make sure there is no circumvention of the prohibition.

*Note 1: 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'. 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/136187>

## **What happens to the dry- and wet-leasing arrangements and code-sharing agreements between the EU air operator certificate (AOC) holders and Russian aircraft operators?**

### **Answer**

In line with Article 3d(1) of Regulation (EU) No 833/2014, it shall be prohibited for 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 that is owned or chartered<sup>(2)</sup> or otherwise controlled<sup>(1)</sup> by any Russian natural or legal person, entity or body, to land in, take off from or overfly the territory of the European Union.

Accordingly, such leasing 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.

*Note 1: 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'. 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/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 (ref. 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 (cf. items X.D.V.001 and X.E.V.001 of Annex VII to said Regulation).

**Last updated:**

08/03/2024

**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 PPL, SPL, BPL or national pilot license issued to fly Annex I aircraft, such as microlights, etc.)? Can I**

**Answer**

Russian citizens, regardless of them holding another citizenship, can exercise private pilot privileges to land in, take off from or overfly the territory of the European Union in a non-Russian-registered aircraft which is NOT owned or chartered<sup>(2)</sup> or otherwise controlled<sup>(1)</sup> by any Russian natural or legal person, entity or body.

This means that Russian citizens are not prevented from renting, borrowing for free, or otherwise using aircraft of a flying club to exercise their private pilot privileges.

However, Russian citizens are prohibited to exercise private pilot privileges to pilot a Russian-registered aircraft, or a non-Russian-registered aircraft that is owned or chartered or otherwise controlled by a Russian natural or legal person, entity or body (cf. Article 3d of Regulation (EU) No 833/2014). This means, for example, that Russian citizens cannot fly their own aircraft in the EU airspace or use an aircraft of an EU company or of a third-country company that is controlled by a Russian natural or legal person.

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.

*Note 1: 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'. 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/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<sup>(2)</sup> or otherwise controlled<sup>(1)</sup> by any Russian natural or legal person, entity or body.

*Note 1: 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'. 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 putting 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, 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 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:**

08/03/2024

**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 8**

**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>

**EASA TCO authorisations - Restrictive measures  
Russia**

**Are Third Country Operator authorisations issued by EASA to airlines from Russia still valid?**

**Answer**

No, in application of the Sanctions Regulation EASA has suspended all TCO authorisations for operators in respect of which Russia acts as the State of the Operator.

**Last updated:**

15/03/2022

**Link:**<https://www.easa.europa.eu/en/faq/136189>**Is a TCO one off-notification under TCO.305 of Regulation (EU) No 452/2014 needed from a Russian operator for flight(s) performed under an exemption granted by a Member State in accordance with Article 3d (3) of Regulation (EU) No 833/2014?****Answer**

As a result of the restrictive measures enacted through Council Regulation (EU) No 833/2014 prohibiting Russian aircraft operators to land in, take off from or overfly the EU, EASA suspended all TCO authorisations issued to Russian air carriers. Due to the practical impact of the sanctions on the Russian operators, EASA is not in a position to conduct effective oversight of Russian TCO authorized operators and to attest their safety in compliance with Regulation (EU) No 452/2014.

Council Regulation (EU) No 833/2014 does, however, allow Member States to exceptionally authorise certain operations into their territory by Russian air carriers based on an exemption issued in accordance with Article 3d(3) of that Regulation, in particular for humanitarian purposes or any other purpose consistent with the objectives of that Regulation. EASA is not involved in the issuance of such exemptions, which are an exclusive prerogative and responsibility of the Member States, and operations under such exemptions do not require notifications from the operator to EASA under Regulation (EU) No 452/2014.

**Last updated:**

11/08/2022

**Link:**<https://www.easa.europa.eu/en/faq/136300>

## **Operation of unmanned aircraft - Restrictive measures Russia**

**Are Russian unmanned-aircraft operators registered in an EU Member State allowed to operate unmanned aircraft within the European Union?**

### **Answer**

No, under Regulation (EU) No 833/2014, it is prohibited for Russian unmanned-aircraft operators to operate within the European Union. It makes no distinction between manned and unmanned aircraft.

### **Last updated:**

08/03/2024

### **Link:**

<https://www.easa.europa.eu/en/faq/136190>

**How to conduct in a case where a drone operator from Russia wants to conduct a drone show in an EU Member State? The application is issued by an MS applicant, but every document they have provided us (including the operations manual and risk assessment) c**

### **Answer**

Under the Sanction Regulations, it is prohibited for Russian unmanned-aircraft operators to operate within the European Union. If the competent authority has grounds to believe that the actual operator is not the EU applicant but the operator from Russia, the application should be rejected.

### **Last updated:**

08/03/2024

### **Link:**

<https://www.easa.europa.eu/en/faq/136191>

**Is it allowed for a Russian citizen to fly an unmanned aircraft**

## **system (UAS) for an operator registered in the European Union? Does it matter whether they are resident in a Member State or Russia?**

### **Answer**

Russian citizens, as employees (or similar), are permitted to fly a UAS for the benefit of operators that are not subject to the sanctions. It does not matter whether those Russian citizens have a residence in the European Union or not.

However, Russian citizens are not allowed to fly Russian-registered UAS or non-Russian registered UAS that are owned or chartered<sup>(2)</sup> or otherwise controlled<sup>(2)</sup> by a Russian natural or legal person, entity or body. This means, for example, that Russian citizens cannot fly their own UAS in the European Union or use a UAS operated by an EU company or a company from a third country which is controlled by a Russian natural or legal person.

*Note 1: 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'. 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/136915>

## **ATM/ANS - Restrictive measures Russia**

### **Are Aeronautical Database Suppliers (DAT) located in the EU permitted to continue to supply aeronautical information to customers in Russia?**

### **Answer**

As entities located in the EU, DAT providers are not allowed under Regulation (EU) 833/2104 to provide technical assistance or other services related to aviation

directly or indirectly to any natural or legal person, entity or body in Russia or for use in Russia

**Last updated:**

11/08/2022

**Link:**

<https://www.easa.europa.eu/en/faq/136192>

**Are Aeronautical Database Providers (DAT Providers) located in the EU permitted to continue to receive aeronautical information from Russian authoritative sources (e.g. Russian AIP), necessary to build their products?**

**Answer**

Receiving aeronautical information from an authoritative source in Russia is not impeded by the Sanctions Regulations, insofar as the DAT provider does not engage in any transactions prohibited under Regulation (EU) 833/2014 or make funds or economic resources available to person/entities listed under EU sanctions, for instance in Regulation (EU) No 269/2014.

**Last updated:**

11/08/2022

**Link:**

<https://www.easa.europa.eu/en/faq/136916>

**With regards to technical assistance, in particular the dissemination of aeronautical information, can this be provided to Russian operators when they are operating over the Atlantic Ocean?**

**Answer**

According to Article 3d of Council Regulation (EU) 833/2014, as amended, it is prohibited for any aircraft operated by Russian air carriers, including as a marketing carrier in codes-haring 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.

Flights over international waters are not prohibited. The prohibition does not apply in the case of emergency landing and emergency overflight. The Regulation also provides for certain exemptions from the general ban.

Since flights over international waters are not forbidden, and flights over the EU territory can be authorised in certain specific cases (such as emergency landing or overflight), it is not forbidden to disseminate aeronautical information to them.

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