

EU restrictive measures against Russia

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](#).

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 Implementing Regulation (EU) 2022/336 amended Council Implementing Regulation (EU) 269/2014 by adding a list of 26 persons and one entity to the list of persons, entities, and bodies subject to restrictive measures which had been set out in Annex I to Regulation (EU) N° 269/2014.

Last updated:

15/03/2022

Link:

<https://www.easa.europa.eu/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.

Last updated:

15/03/2022

Link:<https://www.easa.europa.eu/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. If for example a Russian citizen flies privately as a pilot and consequently controls when and where the aircraft flies, then the sanctions apply. On the other hand, 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.

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29/03/2022

Link:<https://www.easa.europa.eu/faq/136154>**Do the sanctions apply to persons with dual nationality, i.e a person who holds both a Russian passport as well as an EU/non-**

EU passport?

Answer

What matters is if the person has a Russian passport, not the other passports she/he may hold. Dual nationality does not release a person from sanctions. Same applies to persons having a right of permanent residence in an EU country, if they are still Russian citizens.

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15/03/2022

Link:

<https://www.easa.europa.eu/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. However, it is important to note that this transition period 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. Hence, even if the delivery of the goods itself might be possible until 28 March, the provision of related services (and insurance to the goods) is prohibited.

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:

15/03/2022

Link:

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

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/faq/136157>

Do the EU sanctions regulations towards Russia 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

Answer

Yes, the EU sanctions 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:

15/03/2022

Link:

<https://www.easa.europa.eu/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/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 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:

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Link:

<https://www.easa.europa.eu/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/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/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/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/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/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/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.

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Link:

<https://www.easa.europa.eu/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.

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05/04/2022

Link:

<https://www.easa.europa.eu/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 (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 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.

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15/03/2022

Link:

<https://www.easa.europa.eu/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.

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15/03/2022

Link:

<https://www.easa.europa.eu/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.

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Link:

<https://www.easa.europa.eu/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.

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15/03/2022

Link:

<https://www.easa.europa.eu/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.

Last updated:

15/03/2022

Link:

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

As an organisation approved in accordance with Regulation (EU) 1321/2014, am I allowed to provide any services to Russian operated or registered aircraft?

Answer

No, 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.

Last updated:

15/03/2022

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

Is it allowed for a maintenance organisation approved by EASA or an EASA Member State under Part-145 to provide Russian operated or registered aircraft maintenance services e.g., to park aircraft for short term storage, engine preservation etc.?

Answer

No, according to Article 3(c) of Regulation (EU) No 833/2014, as amended by Regulation (EU) 2022/328, such aircraft cannot benefit from maintenance services regulated under Regulation (EU) 1321/2014. However, maintenance organisations are not prevented from, e.g. towing the 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 the aircraft are not as such allowed.

However, this service can be made available for aircraft 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 and may return it to a location outside Russia.

Last updated:

15/03/2022

Link:<https://www.easa.europa.eu/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.

Last updated:

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Link:

<https://www.easa.europa.eu/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 otherwise to circumvent the sanctions (N.B. Article 12 prohibits any measures by a third party that might result in circumventing the sanctions).

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Link:

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

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:

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Link:

<https://www.easa.europa.eu/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.

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15/03/2022

Link:

<https://www.easa.europa.eu/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.

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Link:

<https://www.easa.europa.eu/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.

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Link:

<https://www.easa.europa.eu/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 Russia.

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Link:

<https://www.easa.europa.eu/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/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 EU, a Russian owned, registered 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.

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Link:

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

As an ATO/DTO/organisation operating FSTDs subject to Regulation (EU) No 1178/2011 and having principal place of business within the EU territory, am I allowed to provide either theoretical or practical training, in an FSTD or in an aircraft, to Russian c

Answer

In principle, it is prohibited to provide technical assistance, brokering services or other 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 any natural or legal person, entity or body in Russia or for use in Russia.

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.

Training could be allowed if done for the purpose of later operating a non-Russian aircraft, i.e. if the student or candidate is e.g. destined to fly as an employee on an EU airline. If the intention is to fly in Russia or Russian controlled/registered aircraft, then such training would be support to the use of banned aircraft or operators and hence prohibited. For private pilots (who presumably would be flying themselves and are Russian citizens) such training is not allowed. Furthermore, the training cannot take place in Russia.

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29/03/2022

Link:<https://www.easa.europa.eu/faq/136178>**I am a holder of an examiner certificate issued in accordance with Annex I (Part-FCL) of 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 could be allowed if done for the purpose of later operating a non-Russian aircraft i.e. if the student or candidate is e.g. destined to fly as an employee on an EU airline. If the intention is to fly in Russia or Russian controlled/registered aircraft, then such tests would be support to the use of banned aircraft or operators and hence prohibited. For private pilots (who presumably would be flying themselves and are Russian citizens) such examinations or checks are not allowed. Furthermore, the skill tests, proficiency checks or assessments of competence cannot take place in Russia.

Last updated:

15/03/2022

Link:

<https://www.easa.europa.eu/faq/136179>

Is it allowed for Russian citizens to take theoretical knowledge examination? If it is not allowed, how to proceed with persons who have already started the examination but have not yet finished?

Answer

Training, testing and checking could be allowed if done for the purpose of later operating a non-Russian aircraft i.e. if the student or candidate is e.g. destined to fly as an employee on an EU airline. If the intention is to fly in Russia or Russian controlled/registered aircraft, then such examinations would be support to the use of banned aircraft or operators and hence prohibited. For private pilots (who presumably would be flying themselves and are Russian citizens) such examinations are not allowed. Furthermore, the examination cannot take place in Russia.

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Link:

<https://www.easa.europa.eu/faq/136180>

Is it allowed to issue a Part-FCL licence on the basis of a Russian licence? Is there a difference if a person is 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, including contacts with the Russian licensing authorities, which is currently not possible.

Last updated:

15/03/2022

Link:

<https://www.easa.europa.eu/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. If the person would fly as an employee of a non-sanctioned (EU) operator, then this is permitted as she/he would not be in control of the aircraft in the sense of deciding when and where it flies.

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Link:

<https://www.easa.europa.eu/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 833/2014 do not limit import of goods from Russia, nor the support given by the Russian manufacturer to their use in the EU. If the training is provided to persons that are not subject to the sanctions (i.e. not Russian persons or intending to operate aircraft subject to the sanctions) it may continue also, provided that the FSTD operator is able to continue to maintain its qualification certificate. However, this answer is without prejudice to the possibility that one of the persons behind these companies would personally be mentioned in the list of persons who are subject to asset freezes. If that were the case, it would limit possibility to trade with these companies.

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Link:

<https://www.easa.europa.eu/faq/136183>

If Ukrainian pilot wants to validate his/her licence, but getting a

verification from Ukrainian CAA is limited or even impossible, what are the options for such pilot to get a Part-FCL license?

Answer

Ukrainian citizens are not subject to sanctions, so normal 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 EASA Basic Regulation Article 71 to facilitate such conversions, taking also account of the possibility to mitigate any safety risks e.g. by the use of more comprehensive skill tests and interviews.

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Link:

<https://www.easa.europa.eu/faq/136184>

If a Russian citizen has been issued with a Part-FCL licence but the person has not picked the licence up 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 e.g. destined to fly as an employee on an EU airline. If the intention is to fly in Russia or Russian controlled/registered aircraft, then handing over the licence would be support to the use of banned aircraft or operators and hence prohibited. For private pilots (who presumably would be flying themselves and are Russian citizens) the license should not be handed over.

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Link:

<https://www.easa.europa.eu/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 e.g. destined to fly as an employee on an EU airline. If the intention is to fly in Russia or Russian controlled/registered aircraft, 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. For private pilots (who presumably would be flying themselves and are Russian citizens) no EU medical certificate should be issued.

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Link:<https://www.easa.europa.eu/faq/136298>

Aircraft operations - Restrictive measures Russia

Are aircraft registered in Russia or operated by Russian operators allowed to fly into the EU?

Answer

No, except in case of some limited exceptions. In accordance with the Sanctions Regulation 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 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, except in case of an emergency landing or emergency overflight.

Last updated:

15/03/2022

Link:<https://www.easa.europa.eu/faq/136185>

The Sanctions Regulation prohibits any non-Russian-registered aircraft which is owned or chartered, or otherwise controlled by

any Russian natural to land in, take off from or overfly the territory of the Union, except in case of an emergency landing or e

Answer

Russian natural person should be understood as any person with Russian nationality, regardless of whether that person also possess another nationality, citizenships or a permanent residency in the EU.

Last updated:

15/03/2022

Link:

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

If the aircraft is rented by an EU or 3rd country resident, but the flight is from Russia to the EU, is it allowed? Alternatively, if there is at least one Russian citizen who is not on the sanction list, is it allowed to approve these flights?

Answer

Such a flight is allowed only if (i) the aircraft is not operated by a Russian air carrier, (ii) the aircraft is not registered in Russia (iii) the aircraft is not owned or chartered, or otherwise controlled by any Russian natural or legal person, entity or body; and (iv) there are no persons on board the aircraft who are subject to a listing under the Sanctions Regulation.

If one of the passengers is Russian, but other factors remain as above, it needs to be verified if this one Russian passenger could be considered to control the flight (i.e. be the actual instigator or renter). If not, then the flight is allowed, just like any airline flight with Russian passengers amongst other passengers who have bought a ticket.

Last updated:

15/03/2022

Link:

<https://www.easa.europa.eu/faq/136187>

What happens to the dry and wet leasing arrangements and code-sharing agreements between the EU AOC holders and Russian aircraft operators?

Answer

In accordance with the Sanctions Regulation aircraft operators in respect of which an EU Member State acts as the State of Operator, are prohibited to enter into wet lease, dry lease or code-sharing agreements with aircraft operators of Russia or with respect to aircraft registered in Russia. Accordingly, such leasing agreements should not be approved by National Competent Authorities 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.

Last updated:

15/03/2022

Link:

<https://www.easa.europa.eu/faq/136188>

My organisation is a navigational database provider established in the EU. Am I allowed to provide updates of my product to my Russian customer?

Answer

No. Providing updates to navigational database 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 Union, to any natural or legal person, entity or body in Russia or for use in Russia (ref. Art. 3c(1) of Regulation (EU) 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 of the same regulation).

Last updated:

29/03/2022

Link:<https://www.easa.europa.eu/faq/136299>

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/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 restrictive measures and their practical impact 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:

29/03/2022

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

Operation of unmanned aircraft - Restrictive measures Russia

Are Russian unmanned aircraft operators registered in the EU Member State allowed to operate unmanned aircraft within the EU?

Answer

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

Last updated:

15/03/2022

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

How to conduct in a case, where a drone operator from Russia wants to conduct a drone show in MS. The application is issued by MS applicant, but every document they have provided us (including operations manual and risk assessment), indicates clearly that

Answer

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

Last updated:

15/03/2022

Link:<https://www.easa.europa.eu/faq/136191>**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 the Sanctions Regulation 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:

15/03/2022

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