

Q&As Batch 2 – 29/03/22

Type nr	Type	Question	Proposed answer	Q nr
1	Common issues	We understand that following evaluation of the terms „technical assistance” and “other services” as mentioned in the Sanctions Regulations, EASA has suspended certificates issued to organisations in Russia. Is this interpretation also applicable to approvals and certificates issued by EU Member States in the same way?	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.	#136289 #56
2	Design certificates and design organisation approvals	Can a holder of a design organisation approval (DOA) apply to EASA for a supplemental type certificate (STC) or other design approval (e.g. minor change) for a product, part or non-installed equipment, that is to be installed on an aircraft operated by a Russian operator?	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.	#136290 #53
2	Design certificates and design organisation approvals	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?	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.	#136291 #80

Type nr	Type	Question	Proposed answer	Q nr
2	Design certificates and design organisation approvals	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?	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	#136292 #54

Type nr	Type	Question	Proposed answer	Q nr
2	Design certificates and design organisation approvals	Will EASA continue to monitor, and eventually adopt FATA Airworthiness Directives for Russian types whose type certificate was suspended by EASA?	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.	#136293 #63
2	Design certificates and design organisation approvals	Will ADs issued by EASA to Russian types that were recently suspended remain valid?	Yes. These ADs remain valid and publicly available in the EASA Safety Publication Tool.	#136294 #64
5	Training and licensing of maintenance personnel	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?	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.	#136295 #21
5	Training and licensing of maintenance personnel	As competent authority of an EU Member State, am I allowed to issue Part-66 licence to a Russian national?	Yes, provided that the candidate is or due to be working for a maintenance organisation subject to Regulation (EU) 1321/2014 outside Russia.	#136296 #25
6	Aircrew training and licensing	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?	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	#136297 #37

Type nr	Type	Question	Proposed answer	Q nr
			(who presumably would be flying themselves and are Russian citizens) the license should not be handed over.	
6	Aircrew training and licensing	Can Russian citizens apply for an EU medical certificate issued in accordance with Regulation (EU) No 1178/2011?	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.	#136298 #62
7	Aircraft operations	My organisation is a navigational database provider established in the EU. Am I allowed to provide updates of my product to my Russian customer?	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).	#136299 #81
8	EASA TCO authorisations	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	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	#136300 #78

Type nr	Type	Question	Proposed answer	Q nr
		accordance with Article 3d (3) of Regulation (EU) No 833/2014?	<p>effective oversight of Russian TCO authorized operators and to attest their safety in compliance with Regulation (EU) No 452/2014.</p> <p>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.</p>	

Correction/clarification/deletion of existing FAQs:

Type nr	Type	Question	Answer	FAQ nr
6	Aircrew training and licensing	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 citizens?	<p>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.</p> <p>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.</p> <p>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.</p>	#136178 #28

Type nr	Type	Question	Answer	FAQ nr
2	Design certificates and design organisation approvals	Am I allowed to send any type of technical information, including safety information related to the design, to my customer in Russia, or maintain my Russian customer's access to my dedicated IT system for such information (e.g. service bulletins, manuals)?	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.	#136160 #09

Type nr	Type	Question	Answer	FAQ nr
1	Common issues	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 airline, conducting maintenance for an EU aircraft, working in an EU Part 145 organisation, working as cabin crew in EU airlines)?	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.	#136154 #03