



# REPUBLIC of SAN MARINO CIVIL AVIATION AUTHORITY

Information Circular No. 32 Issue 02

## OPERATIONS AFFECTED BY SANCTIONS ON RUSSIA

### 1. Introduction

As a consequence of a military operation in Ukraine by Russian armed forces many countries, such as the USA, UK and EU, have condemned in the strongest possible terms the Russian Federation's military aggression against Ukraine and adopted individual and economic sanctions. Whilst the Republic of San Marino is not involved in any of these State's measures, there are direct implications which affect the operation of San Marino registered aircraft and are in addition subject to the application of the recently published DECREE – LAW no. 35 of 15 March 2022.

The aim of this circular is to ensure that the aircraft owners and operators of San Marino registered aircraft are aware of this issue and refrain from the following types of operations and transactions.

### 2. Effect on Operations

The following will remain in effect until further notice;

- (a) Any natural or legal person, entity or body on the EU or U.S. sanctions list is not allowed to overfly or land in the Republic of San Marino except for humanitarian reasons.

*Note: Refer to Persons stated in Regulation (EU) 2022/332 of 25 February 2022 implementing Regulation (EU) No 269/2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine.*

- (b) Any Russian-registered aircraft, and any non-Russian-registered aircraft which is owned or chartered, or otherwise controlled by any Russian natural or legal person, entity or body on the EU or US sanctions list, is not permitted to land in, take off from, or overfly the territory of the Republic of San Marino.

*Note: Paragraphs (b) and (c) shall not apply in the case of an emergency landing or an emergency overflight if the Republic of San Marino Civil Aviation and Maritime Navigation Authority (CAA) have determined that such landing, take-off or overflight is required for humanitarian purposes, SAR and leased aircraft one-way return flights or for any other purpose consistent with the objectives of the Republic of San Marino.*



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- (c) It shall be prohibited to provide any one or any combination of the following activities to any person, entity or body on the EU or US sanctions list: 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, directly or indirectly, to any natural or legal person, entity or body in Russia or for use in Russia.

### **3. Operations within the Russian Federation or Belarus and Ukraine**

Whilst San Marino registered aircraft are not prevented from operations into and within the Russian Federation or Belarus, it would be expected that such operations would be closely scrutinised by various States.

Aircraft manufacturers may search/monitor aircraft flying in Russian and Belarus airspace and regardless of the nationality of the owner or home base of the aircraft, may withdraw all support, including the suspension of access to aircraft data, e.g. AFM, but also providing parts or other services. These actions may affect the airworthiness of the aircraft. Taking this into account, San Marino CAA have issued a Directive 01/2002 stating San Marino registered aircraft are prohibited from operating into Ukraine, Russian or Belarus airspace until further notice.

Operations into Ukrainian airspace are currently restricted by NOTAM although San Marino registered aircraft may be permitted in the future. Future operations should be carefully planned using conflict zone criteria and operations may attract EU and USA sanctions.

### **4. Recommendation and Warning**

All aircraft owners and operators are accordingly invited to refrain from effecting operations and transactions breaching EU and USA sanctions and to be aware that any such operations and transactions may lead to immediate aircraft cancellation from the San Marino Registry, as well as to criminal penalties or administrative sanctions on a case-by-case basis.

### **5. Legal Disclaimer**

The CAA will monitor compliance with this Information Circular acting in its role as public regulatory body for San Marino registered aircraft, always provided that the CAA shall assume no liability with respect to potential operations and transactions not in the national interest of the Government of San Marino.

Therefore, any such operations and transactions shall remain under the exclusive liability of the relevant aircraft owner and/or operator.



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This is a rapidly evolving situation and you are therefore, strongly urged to use this, and any other pertinent information, to assess flight safety risk and to share any additional information you may receive regarding threats to safety and security of civil aviation.

Operators of San Marino registered aircraft should also refer to Information Circular No. 13 - Operations not In the National Interest.

Operators are encouraged to keep up to date with various State sanctions as they may be increased, amended or deleted at short notice. This Information Circular will be reviewed on a regular basis and, if necessary, amended accordingly.

Yours truly,

Eng. Marco Conti  
Director General

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