



REPUBLIC of SAN MARINO

CIVIL AVIATION AUTHORITY

Information Circular No. 38 Issue 01

Subject: Reminder of Restrictive Measures under Legislative Decrees Nos. 59, 67 and 68 of 2022 and subsequent amendments

1. Purpose

Considering the commitments undertaken by the Republic of San Marino with Legislative Decree no. 27 of 4 March 2022, in order to avoid potential financial transactions, by listed entities, contrary to the restrictive measures themselves and aimed at combating activities that threaten international peace and security, the provisions of the decrees apply in order to promptly implement the European Union restrictive measures established by the aforementioned Decision and Regulation.

Considering that:

“Annex(s)”: is the Annex to Council Decision 2014/145/CFSP of 17 March 2014 entitled “List of persons, entities and bodies referred to in Articles 1 and 2” as amended and Annex I to Council Regulation (EU) No. 269/2014 of 17 March 2014 entitled “List of natural and legal persons, entities and bodies referred to in Article 2” as amended.

“Decision”: is Decision No. Council Regulation (EU) No 2014/145/CFSP of 17 March 2014, as amended, concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty, and independence of Ukraine;

“Regulation”: is Council Regulation (EU) No 269/2014 of 17 March 2014, as amended, concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty, and independence of Ukraine;

The purpose of this circular is to remind all operators under the jurisdiction of the San Marino Civil Aviation Authority (SM CAA) of the restrictive measures imposed by the Republic of San Marino in 2022, which are in force and effect. These measures were enacted through the following legislative instruments:

- **Legislative Decree No. 59 of 7 April 2022 - *TRADE RESTRICTIVE MEASURES IMPLEMENTING DECISION (EU) 2014/512/CFSP OF THE COUNCIL OF THE EUROPEAN UNION AND SUBSEQUENT AMENDMENTS AND COUNCIL REGULATION (EU) No 833/2014 OF 31 JULY 2014 AND SUBSEQUENT AMENDMENTS (in particular articles 4, 9 and 10)***



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- **Legislative Decree No. 67 of 28 April 2022 - *RESTRICTIVE MEASURES IMPLEMENTING DECISION 2014/145/CFSP OF THE COUNCIL OF THE EUROPEAN UNION AND SUBSEQUENT AMENDMENTS AND COUNCIL REGULATION (EU) No 269/2014 OF 17 MARCH 2014 (in particular articles 5, 6, 11, 13 and 15)***
- **Legislative Decree No. 68 of 28 April 2022 - *FINANCIAL RESTRICTIVE MEASURES IMPLEMENTING DECISION (EU) 2014/512/CFSP OF THE COUNCIL OF THE EUROPEAN UNION AND SUBSEQUENT AMENDMENTS AND COUNCIL REGULATION (EU) No 833/2014 OF 31 JULY 2014 AND SUBSEQUENT AMENDMENTS***

2. Applicability

These decree-laws apply:

1. within the territory of the Republic of San Marino, including its airspace;
2. on board all aircraft or vessels under the jurisdiction of San Marino;
3. to any citizen of San Marino located within or outside the territory of the Republic of San Marino;
4. to any legal person, entity, or organization located within or outside the territory of the Republic of San Marino and incorporated under San Marino law;
5. to any legal person, entity, or organization in relation to economic activities carried out, in whole or in part, within the territory of the Republic of San Marino.

Considering the above-mentioned recipients, the circular applies to all San Marino aircraft operators, Air Operator Certificate (AOC) holders, aircraft owners, pilots, and any individuals or entities engaged in aviation-related activities under San Marino registration or oversight.

3. Key Provisions

The above-mentioned legislative decrees establish restrictive measures including, but not limited to:

- **Prohibition of air transport or general aviation operations** involving individuals or entities subject to sanctions or restrictive measures.
- **Prohibition of carriage of sanctioned persons and/or goods**, whether for remuneration (commercial air transport) or otherwise.
- **Obligation of compliance** with restrictions imposed by the Republic of San Marino, in alignment with applicable international sanctions frameworks.

Operators are reminded that **any activity in breach of these provisions constitutes a violation of San Marino law** and may result in sanctions, suspension or revocation of



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operating privileges, and further legal consequences.

4. Responsibilities of Operators and Pilots

All operators and pilots-in-command must ensure that:

1. *Pre-flight planning and passenger screening procedures are adequate to identify potential breaches.*
2. *Due diligence is exercised to prevent the carriage of sanctioned persons or goods.*
3. *Records and documentation are maintained and made available for inspection by the SM CAA when requested, pursuant to applicable regulations.*

5. Enforcement

Violations of Legislative Decrees Nos. 59, 67, and 68 of 2022 will be subject to investigation and enforcement action by the SM CAA. Sanctions may include fines, suspension of operating authorisations, or other penalties as prescribed by law.

Article 5 decree 67

(Freezing Measures)

1. *All assets or funds belonging to, or owned, held, or controlled by natural or legal persons, entities, or organizations listed in the Annex shall be frozen.*
2. *The same measure shall apply to natural or legal persons, entities, or organizations identified as associated in the Annexes with the names also listed therein.*
3. *It is prohibited to make assets or funds available, directly or indirectly, to the natural or legal persons, entities, or organizations listed in the Annex, or to any of the natural or legal persons, entities, or organizations associated with them and listed in the Annexes.*
4. *It is also prohibited to allocate assets or funds for the benefit of natural or legal persons, entities, or organizations referred to in the preceding paragraphs.*

Article 13 decree 67

(Verification and reporting obligations for public authorities and administrations)

1. *Public authorities and administrations responsible for maintaining public registers shall verify whether their register contains assets or funds subject to freezing measures.*
2. *If the verification reveals a positive finding, the public authorities or administrations shall immediately record the freezing of the asset or fund in the register and shall immediately notify the Agency and the CMR, indicating the data and information in their possession relating to the frozen assets or funds.*



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Article 15 DECREE 59 (Administrative Violations)

1. *Violations of the obligations set forth in this Decree-Law regarding trade (import-export), in accordance with the provisions of Legislative Decree No. 41 of March 22, 2022, are punishable by an administrative fine ranging from €5,000.00 to €1,000,000.00 according to the procedure set out below. For violations concerning matters within the jurisdiction of the Civil Aviation, Maritime Navigation, and Approval Authority, Law No. 125 of July 29, 2014, as amended, and related reference legislation, apply.*

6. Conclusion

The SM CAA reiterates the importance of strict adherence to the restrictive measures currently in force. Operators are advised to review their compliance policies and operational practices to ensure full conformity with the applicable legislation.

For further guidance or clarification, operators may contact the San Marino Civil Aviation Authority at: info@caa-mna.sm.

Eng. Marco Conti
Director General

07th October 2025