



# REPUBLIC of SAN MARINO CIVIL AVIATION AUTHORITY

## Information Circular No. 34 Issue 01

### RUSSIA RESTRICTIVE MEASURES – EU REGULATION (EU) 2024/1745

#### 1. Introduction

The European Union (EU) has introduced EU Regulation 2024/1745 of 24 June 2024 amending Regulation (EU) No. 833/2014 which imposes the 14<sup>th</sup> Sanction Package against Russia. <https://eur-lex.europa.eu/eli/reg/2024/1745/oj>.

The amendments to Article 3d of Regulation (EU) 2024/1745 include some noteworthy changes that San Marino operators should be aware of.

The regulation amends Regulation (EU) No 833/2014 to expand the ban on Russian aircraft using EU airspace. The ban now applies to any aircraft used for non-scheduled flights, even if they are not owned or possessed by Russian people, if a Russian person can determine the flight's time or location. This includes private and charter flights that serve Russian customers.

Article 3d paragraph 1 is replaced with the following:

‘1. 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 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. The prohibition in this paragraph shall also apply to any other aircraft which is used for a non-scheduled flight and with regard to which a Russian natural or legal person, entity or body is in a position to effectively determine the place or time of its take-off or landing. The prohibition in this paragraph shall not apply to aircraft that have a maximum seating capacity of 4 persons and a maximum take-off mass of no more than 2000 kg when used for private, non-corporate, flights carried out within Union territory and airspace for recreational purposes or for the purpose of training for private pilot licenses and related ratings with Union training providers.’

The regulation also requires operators to provide information to member states' national authorities about non-scheduled flights, including the aircraft's ownership and possibly the passengers. The information shall be provided upon request of the competent authorities of the Member State of departure, destination or overflying. This information is to help verify compliance with the flight ban.



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**2. Recommendation and Warning**

Operators are encouraged to keep up to date with various State sanctions as they may be increased, amended or deleted at short notice.

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.

Yours faithfully,

Eng. Marco Conti  
Director General

27<sup>th</sup> August 2024