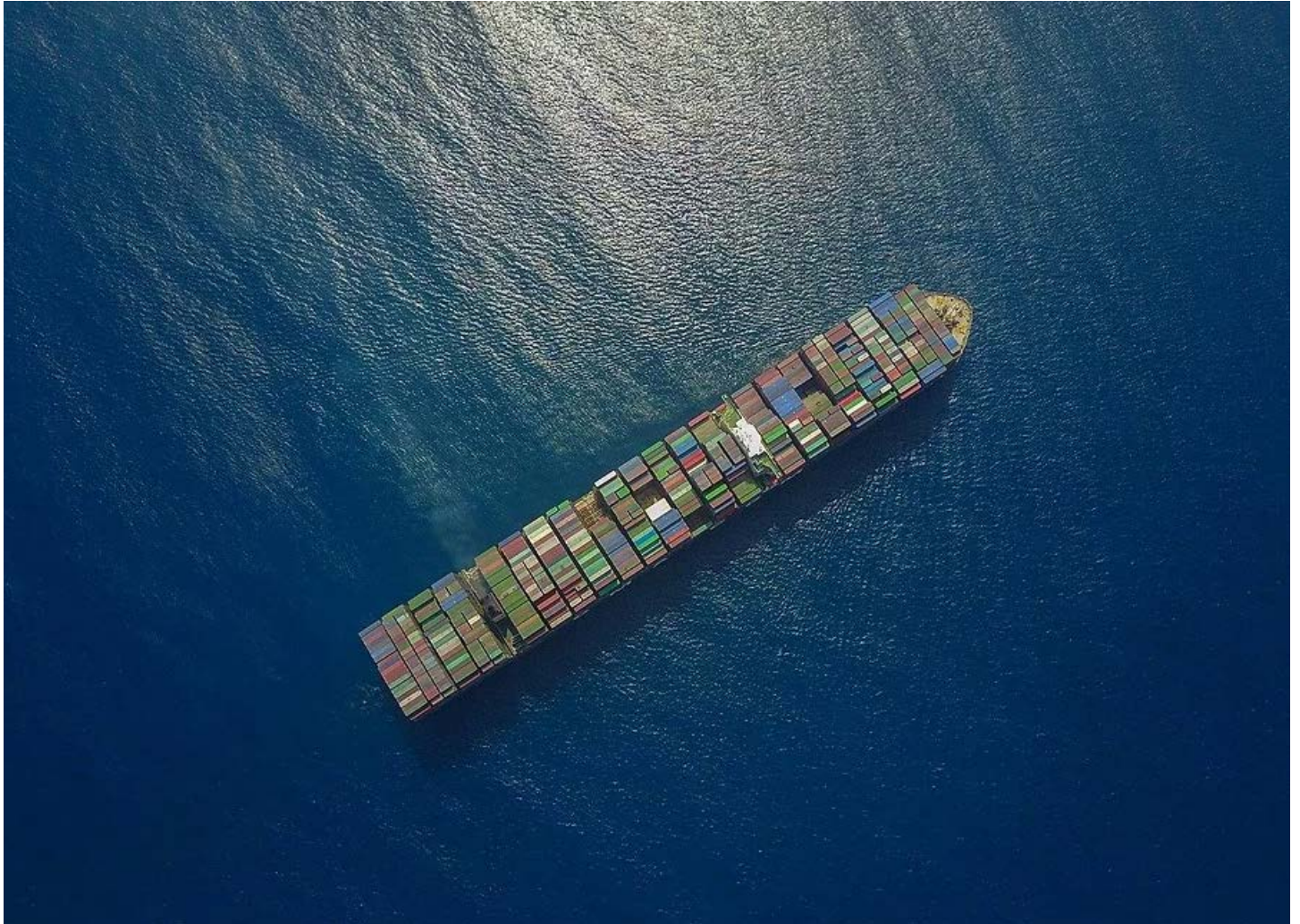




First US enforcement actions against 3 Russian airlines



On February 24, 2022, BIS imposed expansive controls on aviation-related items to Russia, including a license requirement for the export, reexport or transfer (in-country) to Russia of any aircraft or aircraft parts on the Commerce Control List. On 2 March 2022, BIS further excluded any aircraft registered in, owned, or controlled by, or under charter or lease by Russia or a national of Russia from being eligible for license exception Aircraft, Vessels, and Spacecraft (AVS). Accordingly, any U.S.-origin aircraft or foreign aircraft that includes more than 25% controlled U.S.-origin content is subject to a license requirement if, for example, it is Russian-owned or operated and exported to Russia.

On 18 March 2022, BIS publicly released a list of private and commercial aircraft it had been tracking as likely operating in violation of the EAR. BIS further updated the list on 30 April 2022.

The list and additional information on BIS's actions in response to the Russian invasion is available [online](#).

The enforcement actions are targeting Aeroflot, Utair, and Azur Air who operated controlled aircraft subject to the EAR without the required BIS authorization. All international flights conducted by the aforementioned airlines into Russia would have required export or reexport licenses from BIS. Additionally, any domestic Russian flights by the same airlines on aircraft reexported to Russia after 2 March 2022 without the required BIS license are also in violation of General Prohibition Ten, which prohibits continuing with transactions knowing that a violation has occurred or is about to occur.

Source: [BIS Press Release \(7 Apr 2022\)](#).