

From: [MOVE AVIATION SANCTIONS](#)
To: [REDACTED]
Cc: [\(DE\) - Ban on aircraft & Maintenance](#); [\(DE\) - Flight ban](#); [MOVE AVIATION SANCTIONS](#)
Subject: In reply to: Sanctions against Russia, non-commercial pilot licenses - Ares(2022)7050266
Date: mercredi 12 octobre 2022 12:27:02

[In reply to: Sanctions against Russia, non-commercial pilot licenses - Ares\(2022\)7050266](#) (Please use this link only if you are an Ares user – Svp, utilisez ce lien exclusivement si vous êtes un(e) utilisateur d’Ares)

Dear [REDACTED],

Please accept the apologies for delayed reply to your emails dated 18 July and 18 August 2022 (move.ddg2.e.2(2022)7860078 and move.ddg2.e.2(2022)7859705 respectively).

With regard to your question regarding non-commercial pilot licences and suggestion to "untighten" the restrictive regulation in a way, that holders of a non-commercial license (PPL, LAPL, SPL, BPL) and national licenses (recreational) could be excluded from the mentioned regulations; please note that your suggestion will be part of any future deliberation on these matters. However, at this stage we cannot provide you any details about whether and when such deliberations will take place.

Please also note that the question of interpretation of Regulation 833/2014 (as amended) is currently pending before the General Court. The Commission will therefore have to wait for the interpretation of Article 3d to be clarified by the Union courts, before deciding on any further step.

Best regards,

MOVE AVIATION SANCTIONS team