

Notice No.

GEN-02-2022

Date:

20th March 2022

Status of Bermuda Registered Aircraft Operated by Russian Air Operators



This General Notice is to advise stakeholders of the status of Bermuda registered aircraft formerly operated by Russian air operators.

In view of international sanctions, which have resulted in a deteriorating environment for assuring the continuing airworthiness of aircraft in the Russian Federation, Bermuda Civil Aviation Authority (BCAA) in the interest of aviation safety, has provisionally suspended all Certificates of Airworthiness of those aircraft that were operating under the Article 83bis Agreement between Bermuda and the Russian Federation. Notices have been sent to all affected Russian air operators and the Russian regulatory authority to advise of the suspensions with effect from 23:59 UTC 12th March 2022.

On 18th March 2022 the Russia Federation advised BCAA that they were suspending the Article 83bis Agreement with immediate effect. With the Russian Federation suspending the Agreement, any regulatory oversight responsibilities formerly transferred to the Russian Federation now revert to Bermuda as the State of Registry.

It has been noted that many of these Bermuda registered aircraft continue to operate illegally in contravention of the ICAO Convention on International Civil Aviation (the Convention) Article 31 - *Certificates of airworthiness* and appropriate Bermuda legislation. Article 33 of the Convention - *Recognition of certificates and licenses* of the Convention requires that the ICAO Contracting States recognize the Certificate of Airworthiness issued by the State of Registry as valid.

The Russian Federation has issued a directive to have Bermuda registered aircraft re-registered in the Russian Federation without first being deregistered by Bermuda and many Bermuda registered aircraft have already been illegally re-registered in Russia. Article 18 of the Convention - *Dual registration* and the Air Navigation (Overseas Territories) Order 2013 allows the transfer of registration, but dual registration is strictly forbidden. In this regard, BCAA is and will continue to deregister aircraft on request from the owner, in accordance with relevant BCAA legislation and procedures, that ensures an aircraft is not deregistered until a registered mortgage or ICAO Cape Town - irrevocable deregistration and export request authorisation (IDERA) is discharged.

Under Article 21 of the Convention — *Report of registrations*, each Contracting State undertakes to supply to any other Contracting State or to ICAO, on demand, information concerning the registration and ownership of any particular aircraft registered in that State. In this regard, BCAA has issued a list of all aircraft on the Bermuda Aircraft Registry which were formerly operating under the Article 83bis Agreement between Bermuda and the Russian Federation. The list will be updated regularly to remove aircraft that are legally deregistered by BCAA. It should be noted that the list includes the aircraft Manufacturer Serial Number (MSN) to assist stakeholders in identifying Bermuda registered aircraft that have been illegally re-registered in the Russian Federation. [The list is found on the BCAA website here.](#)

Should you require additional information concerning this matter kindly contact the BCAA at RegistryEnquiries@bcaa.bm.



Thomas Dunstan
Director General