

EASA withdraws Iran airspace warning. Why?

OPSGROUP Team

3 November, 2021



EASA has withdrawn their Iran CZIB, so what does this actually mean for the safety and security of air operations there?

What is an EASA CZIB?

First up, a CZIB is a Conflict Zone Information Bulletin (if you aren't familiar with the term.)

These are put together by EASA based on aeronautical publications issued by worldwide states, and an assessment of the overall known risks and threats which EASA do via their *Integrated EU Aviation Security Risk Assessment Group*. Quite a mouthful. The point is they are **sharing info on conflict zones to help operators do their own risk assessment** on whether to head in there or not.

OK. So, when we take a look at EASA's CZIBs they actually are more of a **summary of references to other state and authority warnings**. EASA CZIBs do not *in themselves*, appear to make an assessment of risk. They just share what everyone else says and contain a recommendation which more often than not goes something like this –

“Operators should take this information and any other relevant information into account in their own risk assessments, alongside any available guidance or directions from their national authority as appropriate.”

If you want to check out their active ones you can do so here.

EASA updated a large number of them in October 2021. 10 in fact, which included the likes of Iraq, Libya, Mali, Afghanistan, South Sudan... interestingly, **they did not update their Iranian CZIB**.

Instead, they withdrew it.

Why did they withdraw the Iranian CZIB?

That's the big question.

Given that the EASA CZIBs do little more than summarise actual risk statements from other states, and considering other major states still have valid warnings for Iran, it does seem rather odd.

EASA have suggested their decision to withdraw this CZIB is based off an agreement from a recent meeting in which they decided that *the situation in Iran has positively improved allowing to withdraw the current CZIB and to issue as replacement an Information Note shared within the European commercial aviation community on a 'Need-to-know' basis.*

So, when EASA withdraws a CZIB, **this does not mean individual states have also withdrawn their own warnings.** We have not seen the 'Information Note'.

- Special Federal Aviation Regulation (SFAR) 117 – Prohibition Against Certain Flights in the Tehran Flight Information Region (FIR) (OIIX) and KICZ A0050/20 issued 29 October 2020 (see Appendix 1)
- Transport Canada AIC 26/21 issued 12 August 2021 (see Appendix 2)
- United Kingdom AIP ENR 1.1 issued 15 July 2021 (see Appendix 3)
- German AIC 14/21 issued 07 October 2021 (see Appendix 4)
- AIC France Circular A 07/21 issued 20 May 2021 (see Appendix 5)
- India DGCA Notice issued 22 June 2019 (see Appendix 6)
- UAE Safety Decision 2020-01 issued 08 January 2020 (see Appendix 7)
- Swedish Transport Agency AIC A2/2020 issued 30 January 2020 (see Appendix 8)

Iran airspace at altitudes below Flight Level (FL) 250.

All still valid

You can click below to read the (now withdrawn) EASA CZIB.



European Union Aviation Safety Agency

CZIB No.: CZIB-2020-01R2

**Conflict Zone Information
Bulletin**

Withdrawn!

We think the risk remains.

In 2020, Ukraine International Airlines flight PS752 was shot down in the vicinity of OIIE/Tehran, by the Iranian Air Defense system when it was misidentified. **Iran possess significant anti-aircraft weaponry.** This weaponry is in place due to ongoing conflict within Iran, and that has not changed.



The Iranian 'Air Dome' Defense system

As with all risk, likelihood is dependant on **capability** (they have that), and **intent**.

Intent is an interesting one. The didn't *intend* to shoot anyone down with their Air Defense systems, and they don't usually fire their anti-aircraft weaponry without good reason, which means a **risk of misidentification is far higher during times of active attack**, when enemy forces are being targeted.

But the situation in Iran remains volatile, and so the risk level remains.

What is the risk?

A fair few airlines do overfly Iran. The ones that don't generally have political reasons not too – **this doesn't mean the risk isn't there**. The political tensions between some countries and Iran mean the risk of being targeted or experiencing security threats on the ground is far higher.

If the state your aircraft is registered in is on relatively good political terms with Iran then overflying the country above a safe flight level poses less risk *if you remain at that level*.

Descend below FL260-ish and it is a different situation. And if you overfly anywhere, there is a chance you will need to descend and even divert in for certain emergencies. So your risk assessment when "just overflying" needs to take that into account.

Remember – just because you only want to overfly and don't plan on going into Iran does not mean the risk does not apply to you. If there is a possibility you **might have to divert** in then the risk must be taken into account.

This is why operators who do fly into Iran generally have "TOD" checks – a SATCOM call, for example, to their company to confirm the security situation on the ground prior to heading in below that safe altitude. Basically, a check to ask if stuff is kicking off or not.

What do other states say?

The UK CAA Notam EGTT V0012/21 was issued in July 2021. This covers a “general” airspace security warning for a whole bunch of countries, including Iran, and suggests you go check the UK AIP En-route 1.1 section 1.4.5 for more info.

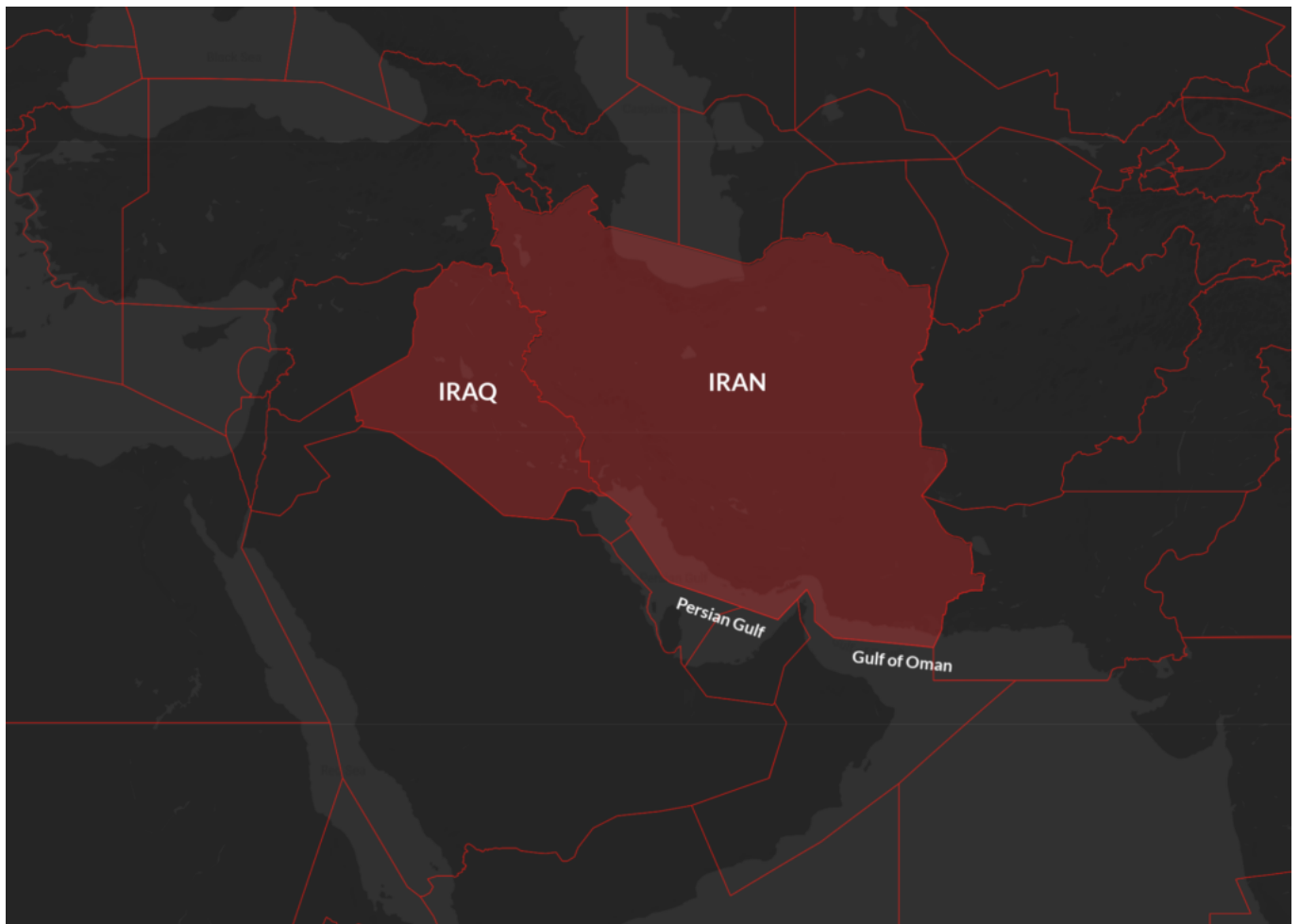
1.4.5 says there is a “*potential risk to aviation overflying this area at less than 25,000ft*” because of “*dedicated anti-aviation weaponry*”. France say don’t go below FL320. **The US says don’t go at all.**

The risk is still there, and that risk was actually summed up pretty well in the now withdrawn CZIB – “*due to the hazardous security situation, and poor coordination between civil aviation and military operations, there is a risk of misidentification of civil aircraft.*”

If you want a summary of all the current warnings and details, visit our Safeairspace page.

The current situation in Iran.

The situation is volatile. There is **significant political conflict** between Iran and some of their regional neighbours. There is also internal conflict. The **primary risk** remains the potential for misidentification from the air defence systems, or surface to surface missiles targeting rebels. There are **secondary risks** from ballistic missile tests (often tested without Notams) and GPS jamming.



Both airspaces and the Persian Gulf pose an airspace risk.

Safeairspace Summary

Our view is that the removal of the EASA CZIB does not signify any change to the threat level in Iran. States have not removed their own warnings and so our Safeairspace warning remains the same until such time as further information is provided on how Iran have *positively improved* the situation.

Want a full briefing?

Just click [here](#). SafeAirspace is our conflict zone and risk database run by OPSGROUP. We continually assesses the risk to operators the world over. It presents that information in a way that will always be simple, clear, and free. **You can also sign up to our new fortnightly risk briefing** that contains only what you need to know, simply by subscribing.

Risk assessing Iran ops - the UIA 737 may have been shot down

Mark Zee

3 November, 2021



Special Update Thursday 09JAN: Members, please see either your email or this post in the Members forum, for a special briefing and update.

08JAN: Iran/Iraq Information page activated with latest information.

The cause of the crash of Ukraine International Airlines (UIA) AUI/PS752 on departure from Tehran is not yet determined, and given political circumstances, may not be clarified beyond reasonable doubt anytime soon.

Purely from the perspective of making a risk assessment for operations to Tehran, and Iran in general, however, **we would recommend the starting assumption to be that this was a shootdown event,**

similar to MH17 – until there is clear evidence to the contrary.

Images seen by OPSGROUP, shown below, show obvious projectile holes in the fuselage and a wing section. Whether that projectile was an engine part, or a missile fragment is still conjecture, but in making a decision as to whether to operate to Iran, erring on the side of caution would dictate that you do not, until there is clear information as to the cause.

Obviously, there is also the wider regional risk as indicated through the US FAA Notams issued late Tuesday night. US operators are covered by these clear and specific Notams – do not operate to Iran, or Iraq, or operate in the Persian/Oman Gulf area.

Other operators are free to make their own judgement, but should note that a majority of non-US international carriers have elected to avoid both countries for the time being.

See also:

- OPSGROUP Article: FAA Bans Flights Over Iraq And Iran Following Missile Strike On US Base
- OPSGROUP Article: Germany publishes new concerns for Iraq overflights

Images from ISNA, Reuters; marking of projectile areas from JACDEC.





No change to Iran airspace warning despite new US sanctions

David Mumford
3 November, 2021



The US reimposed sanctions against Iran on Nov 5. Despite this, so far there has been no change to the FAA guidance to US operators issued on 9th September 2018: **flights to Iran are not prohibited, but operators should “exercise caution” when flying in Iranian airspace.**

However, with the reimposed sanctions comes a new problem if you’re a US operator: you’re **allowed** to overfly Iran, but you’re **not allowed** to pay for all the things needed to make that happen – things like overflight permits, and nav fees.

The rule is simple: no US person or business can pay for services in countries with sanctions against them (like Iran), unless that person or business has a licence to do so, issued by the Office of Foreign Assets Control (OFAC).

And you’re not allowed to get an agent to do it for you either; it’s illegal to skirt the OFAC laws by using a 3rd party company (unless, of course, they’ve been approved by OFAC).

So the big question we have now is this: **if you’re planning to overfly Iran, have you figured out the legalities of paying for services?** How are you making that work? Know someone who’s got an OFAC licence for Iran? **Let us know!**

And one other thing to watch out for – operators with US based insurers should double-check their policies, as you may now no longer be covered for flights to Iran, due to the new sanctions. This is worth checking, even if you’re only planning on overflying the Tehran FIR, as any unplanned landing (decompression, medical, engine fire) may force you into Tehran or another airport – it’s a big chunk of airspace.

Further reading:

- SafeAirspace page for Iran. SafeAirspace provides a current picture of International Airspace, so that you as the Aircraft Operator can make sound decisions on which routes to fly and

which to avoid.

- Our break-down of the US guidance on Iran overflight risk
- What the sanctions mean to non-US operators