



**FOR IMMEDIATE RELEASE**

September 19, 2022

[www.bis.doc.gov](http://www.bis.doc.gov)

**BUREAU OF INDUSTRY AND SECURITY**

Office of Congressional and Public Affairs

[OCPA@bis.doc.gov](mailto:OCPA@bis.doc.gov)

## **COMMERCE IDENTIFIES IRANIAN CARGO AIRLINES FOR APPARENT VIOLATIONS OF U.S. EXPORT CONTROLS**

**WASHINGTON, D.C.** – Today, the U.S. Commerce Department, through its Bureau of Industry and Security (BIS), is updating its list of aircraft that have flown into Russia in apparent violation of the Export Administration Regulations (EAR) by adding the first three Iranian-owned and -operated aircraft providing cargo flight services on U.S.-origin aircraft to Russia. There are now a total of 183 aircraft identified on the list for apparent violations of U.S. export controls.

“Our expansive controls, especially on items such as electronics and aircraft parts, have degraded Russia’s defense industrial base, severely restricted their access to the world economy, and isolated them from the international community,” **said Assistant Secretary of Commerce for Export Enforcement Matthew S. Axelrod.** “When Russia seeks to engage pariah states like Iran in order to backfill for what the international community has cut off, we will take action to thwart such attempts and disrupt such connections.”

Using commercially available data, BIS identified three Iranian cargo aircraft subject to the EAR flying and transporting goods, including electronic items, to Russia in apparent violation of BIS’s stringent export controls on Russia. These aircraft are operated by Mahan Air, Qeshm Fars Air, and Iran Air.

BIS continues to identify and take swift action against foreign airlines operating U.S.-origin aircraft in violation of U.S. export controls, including those that are aiding Russia’s ability to acquire the parts and inputs it needs to sustain its military aggression against Ukraine in violation of the EAR. Based on publicly available information there has been a significant increase in Iranian cargo flights to Russia since its invasion of Ukraine in February 2022. Moreover, Iran has publicly announced its intention to expand cooperation with Russia in the aviation sector by providing spare parts for its airplanes.

Any subsequent actions taken with regard to any of the listed aircraft, including, but not limited to, refueling, maintenance, repair, or the provision of spare parts or services, are subject to the prohibitions outlined in General Prohibition Ten of the EAR (15 C.F.R. § 736.2(b)(10)), which provides:

***(10) General Prohibition Ten - Proceeding with transactions with knowledge that a violation has occurred or is about to occur (Knowledge Violation to Occur).*** You may not sell, transfer, export, reexport, finance, order, buy, remove, conceal, store, use, loan, dispose of, transport, forward, or otherwise service, in whole or in part, any item subject to the EAR and exported or to be exported with knowledge that a violation of the Export Administration Regulations, the Export Administration Act or any order, license, License Exception, or other authorization issued thereunder has occurred, is about to occur, or is intended to occur in connection with the item. Nor may you rely upon any license or License Exception after notice to you of the suspension or revocation of that license or exception. There are no License Exceptions to this General Prohibition Ten in part 740 of the EAR.

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. Belarus was made subject to these restrictions on March 2, 2022. These restrictions apply to airplanes subject to the EAR bearing the livery, colors, or logo of an Iranian company/airline.

The airlines identified today are already subject to a variety of restrictions by the U.S. government for engagement in Iran's consistent activity that is contrary to U.S. national security and foreign policy interests.

Mahan Air has been on BIS's Denied Persons List since March 2008 due to numerous significant, continuing, deliberate, and covert violations of the EAR. Moreover, a BIS-issued Temporary Denial Order (TDO) against Mahan Air remains in effect. Any named parties to the TDO, which further encompasses any related parties, agents, representatives, or those acting for or on their behalf, are broadly prohibited from directly or indirectly participating "in any way" in a transaction involving items subject to the EAR. The TDO also prohibits third parties from engaging in a broad range of conduct subject to the EAR with denied persons. The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) also designated Mahan Air pursuant to Executive Order 13224, a counterterrorism authority, for providing financial, material and technological support to the Islamic Revolutionary Guard Corps-Qods Force (IRGC-QF). In 2019, the U.S. Department of State designated Mahan Air pursuant to Executive Order 13382 – which targets weapons of mass destruction proliferators and their supporters.

OFAC also has designated Qeshm Fars Air pursuant to Executive Order 13224 in January 2019 for being owned or controlled by Mahan Air, and for providing material support to Iran's IRGC-QF. Both Mahan Air and Qeshm Fars Air are identified as Specially Designated Global Terrorist (SDGT) on OFAC's list of Specially Designated Nationals and Blocked Persons (SDN List). The EAR require a license to an SDGT of any item subject to the EAR absent separate authorization from OFAC.

Iran Air was added to BIS's Entity List in March 2020 after it was determined that the airline transported military-related equipment on behalf of Iran's IRGC and Ministry of Defense and Armed Forces Logistics (MODAFL).

The list below has been updated with additions in **bold**. Please note this list is not exhaustive, and the restrictions also apply in any situation in which a person has knowledge that a violation of the EAR has occurred, is about to occur, or is intended to occur in connection with an aircraft or other item that is subject to the EAR, whether or not such aircraft or other item is included on this list. This list will continue to be updated as circumstances warrant.

Additional BIS resources on export controls implemented in response to Russia's invasion of Ukraine are available at:

<https://bis.doc.gov/index.php/policy-guidance/country-guidance/Russia-belarus>

The public may submit confidential enforcement tips via the BIS website:

<https://www.bis.doc.gov/index.php/component/rsform/form/14?task=forms.edit>,  
or by calling the Enforcement Hotline at 1-800-424-2980.

These BIS actions were taken under the authority of the Export Control Reform Act of 2018 and the EAR.

For more information, visit [www.bis.doc.gov](http://www.bis.doc.gov).

**UPDATED LIST AS OF SEPTEMBER 19, 2022**  
**(Additions in bold)**

<b>Owner or Operator</b>	<b>Country</b>	<b>Tail Number</b>	<b>Serial Number</b>	<b>Aircraft Type</b>
Abramovich, Roman	Russia	P4-BDL	37306	787-8 Dreamliner (B788)
Abramovich, Roman	Russia	LX-RAY	6417	G650ER
Aeroflot	Russia	RA-73094	41216	737-8LJ (B738)
Aeroflot	Russia	RA-73121	41203	737-8LJ (B738)
Aeroflot	Russia	VP-BCD / RA-73093	41215	737-8LJ (B738)
Aeroflot	Russia	VP-BCG / RA-73095	41217	737-8LJ (B738)
Aeroflot	Russia	VP-BGG / RA-73096	41222	737-8LJ (B738)
Aeroflot	Russia	VP-BGI / RA-73097	41223	737-8LJ (B738)
Aeroflot	Russia	VP-BGN / RA-73098	41225	737-8LJ (B738)
Aeroflot	Russia	RA-73099	41239	737-8LJ (B738)
Aeroflot	Russia	RA-73100	44440	737-8MC (B738)
Aeroflot	Russia	VP-BMB / RA-73103	41231	737-8LJ (B738)
Aeroflot	Russia	RA-73104	44443	737-8MC (B738)
Aeroflot	Russia	VP-BMO / RA-73108	41233	737-8LJ (B738)
Aeroflot	Russia	VP-BNC / RA-73109	41234	737-8LJ (B738)
Aeroflot	Russia	VP-BON / RA-73112	41200	737-8LJ (B738)
Aeroflot	Russia	VQ-BVP / RA-73122	41204	737-8LJ (B738)
Aeroflot	Russia	VQ-BWA / RA-73123	41207	737-8LJ (B738)
Aeroflot	Russia	VQ-BWC / RA-73125	41210	737-8LJ (B738)
Aeroflot	Russia	RA-73126	41214	737-8LJ (B738)
Aeroflot	Russia	VQ-BWD / RA-73128	41211	737-8LJ (B738)
Aeroflot	Russia	RA-73104	44443	737-8MC (B738)
Aeroflot	Russia	RA-73105	44433	737-8MC (B738)
Aeroflot	Russia	VP-BMM / RA-73107	44439	737-8MC (B738)
Aeroflot	Russia	VP-BNP / RA-73110	44438	737-8MC (B738)
Aeroflot	Russia	VP-BNQ / RA-73111	44432	737-8MC (B738)
Aeroflot	Russia	VP-BPF / RA-73113	44436	737-8MC (B738)
Aeroflot	Russia	RA-73115	41196	737-8LJ (B738)
Aeroflot	Russia	RA-73116	41197	737-8LJ (B738)
Aeroflot	Russia	RA-73117	44442	737-8MC (B738)
Aeroflot	Russia	RA-73118	41198	737-8LJ (B738)
Aeroflot	Russia	VP-BFC / RA-73141	65312	777-300 (ER) (B77W)
Aeroflot	Russia	VQ-BFK / RA-73158	65308	777-300 (ER) (B77W)
Aeroflot	Russia	VQ-BFL / RA-73146	65309	777-300 (ER) (B77W)
Aeroflot	Russia	VQ-BFN / RA-73143	65310	777-300 (ER) (B77W)
Aeroflot	Russia	VQ-BFO / RA-73142	65311	777-300 (ER) (B77W)
Aeroflot	Russia	VP-BGB / RA-73140	41679	777-3M0 (ER) (B77W)
Aeroflot	Russia	VP-BGC / RA-73139	41680	777-3M0 (ER) (B77W)

Aeroflot	Russia	VP-BGD / RA-73138	41681	777-3M0 (ER) (B77W)
Aeroflot	Russia	VP-BGF / RA-73137	41686	777-3M0 (ER) (B77W)
Aeroflot	Russia	VQ-BQB / RA-73136	41687	777-3M0 (ER) (B77W)
Aeroflot	Russia	VQ-BQC / RA-73130	41688	777-3M0 (ER) (B77W)
Aeroflot	Russia	VQ-BQD / RA-73131	41682	777-3M0 (ER) (B77W)
Aeroflot	Russia	VQ-BQE / RA-73132	41683	777-3M0 (ER) (B77W)
Aeroflot	Russia	VQ-BQF / RA-73133	41684	777-3M0 (ER) (B77W)
Aeroflot	Russia	VQ-BQG / RA-73134	41689	777-3M0 (ER) (B77W)
Aeroflot	Russia	VQ-BUA / RA-73135	41685	777-3M0 (ER) (B77W)
Aeroflot	Russia	VQ-BUB / RA-73144	41690	777-3M0 (ER) (B77W)
Aeroflot	Russia	VQ-BUC / RA-73148	41691	777-3M0 (ER) (B77W)
AirBridgeCargo	Russia	VQ-BGZ	37580	747-8HV(F) (B748)
AirBridgeCargo	Russia	VQ-BLQ	37581	747-8HV(F) (B748)
AirBridgeCargo	Russia	VQ-BLR	37668	747-8HV(F) (B748)
AirBridgeCargo	Russia	VQ-BRH	37669	747-8HV(F) (B748)
AirBridgeCargo	Russia	VQ-BRJ	37670	747-8HV(F) (B748)
AirBridgeCargo	Russia	VQ-BVR	60687	747-8HV(F) (B748)
Alrosa	Russia	EI-FCH / RA-73266	32576	737-83N (B738)
Aviastar-TU	Russia	VQ-BBU / RA-73351	25696	757-223(PCF) (B752)
Aviastar-TU	Russia	VQ-BCB / RA-73556	27056	757-223(PCF) (B752)
Aviastar-TU	Russia	VQ-BKK / RA-73352	25731	757-223(PCF) (B752)
Aviastar-TU	Russia	VQ-BON / RA-73355	27054	757-223(PCF) (B752)
Aviastar-TU	Russia	VQ-BSX / RA-73354	27053	757-223(PCF) (B752)
Azur Air	Russia	VP-BYC / RA-73473	30338	757-231 (B752)
Azur Air	Russia	VP-BLV / RA-73076	30043	757-28A (B752)
Azur Air	Russia	RA-73029	26330	757-2K2 (B752)
Azur Air	Russia	VQ-BEY / RA-73072	29382	757-2Q8 (B752)
Azur Air	Russia	VP-BIS / RA-73077	30045	757-2QB (B752)
Azur Air	Russia	VQ-BEZ / RA-73071	29377	757-2QB (B752)
Azur Air	Russia	VQ-BKB / RA-73074	26268	757-2QB (B752)
Azur Air	Russia	VQ-BQA / RA-73073	30044	757-2QB (B752)
Azur Air	Russia	RA-73032	27614	767-306(ER)
Azur Air	Russia	RA-73034	27612	767-306(ER)
Azur Air	Russia	VP-BRA / RA-73470	27477	767-33A(ER) (B763)
Azur Air	Russia	VQ-BEN / RA-73471	28140	767-33A(ER) (B763)
Azur Air	Russia	VQ-BUO	27909	767-33A(ER) (B763)
Azur Air	Russia	RA-73030	24746	767-3Q8(ER) (B763)
Azur Air	Russia	VP-BUV / RA-73078	24745	767-3Q8(ER) (B763)
Azur Air	Russia	VP-BUX / RA-73079	24947	767-3Y0(ER) (B763)
Belavia	Belarus	EW-366PA	29058	737-31S (B733)
Belavia	Belarus	EW-254PA	26294	737-3Q8 (B733)
Belavia	Belarus	EW-527PA	40877	737-82R (B738)
Belavia	Belarus	EW-544PA	35139	737-8K5 (B738)

Belavia	Belarus	EW-455PA	61421	737-8ZM (B738)
Belavia	Belarus	EW-456PA	31422	737-8ZM (B738)
Belavia	Belarus	EW-457PA	61423	737-8ZM (B738)
I-Fly	Russia	EI-GOT / RA-73685	1021	A330-323 (A333)
I-Fly	Russia	EI-GPJ / RA-73686	0965	A330-323 (A333)
I-Fly	Russia	EI-GWF / RA-73684	1265	A330-323 (A333)
<b>Iran Air</b>	<b>Iran</b>	<b>EP-ICD</b>	<b>24134</b>	<b>747-21AC (B742)</b>
<b>Mahan Airlines</b>	<b>Iran</b>	<b>EP-MEE</b>	<b>24383</b>	<b>747-422 (B744)</b>
Nordstar	Russia	VP-BKT / RA-73259	28871	737-33R (B733)
Nordwind	Russia	VP-BJJ / RA-73347	32719	777-2Q8(ER) (B772)
Nordwind	Russia	VQ-BRT / RA-73326	7674	A321-231 (A321)
Nordwind	Russia	VP-BUA / RA-73328	0979	A330-223 (A332)
Pegas Fly	Russia	RA-73272	27608	777-2Q8(ER) (B772)
Pobeda	Russia	VP-BQC / RA-73226	64863	737-8AL (B738)
Pobeda	Russia	RA-73301	39950	737-8LJ (B738)
Pobeda	Russia	VP-BFB / RA-73238	41219	737-8LJ (B738)
Pobeda	Russia	VP-BGQ / RA-73242	41227	737-8LJ (B738)
Pobeda	Russia	VP-BGR / RA-73243	41228	737-8LJ (B738)
Pobeda	Russia	VP-BOD / RA-73248	41238	737-8LJ (B738)
Pobeda	Russia	VP-BOH / RA-73234	41244	737-8LJ (B738)
Pobeda	Russia	VQ-BHC / RA-73239	41220	737-8LJ (B738)
Pobeda	Russia	VQ-BHD / RA-73240	41221	737-8LJ (B738)
Pobeda	Russia	VQ-BHQ / RA-73241	41226	737-8LJ (B738)
Pobeda	Russia	VQ-BHT / RA-73246	41235	737-8LJ (B738)
Pobeda	Russia	VQ-BHU / RA-73244	41229	737-8LJ (B738)
Pobeda	Russia	VQ-BHW / RA-73249	41241	737-8LJ (B738)
Pobeda	Russia	VQ-BWG / RA-73235	41205	737-8LJ (B738)
Pobeda	Russia	VQ-BWH / RA-73236	41206	737-8LJ (B738)
Pobeda	Russia	VP-BQB / RA-73225	64862	737-8MC (B738)
Pobeda	Russia	VP-BQE / RA-73227	64864	737-8MC (B738)
Pobeda	Russia	VP-BQH / RA-73229	64866	737-8MC (B738)
Pobeda	Russia	VP-BQJ / RA-73230	64867	737-8MC (B738)
Pobeda	Russia	VP-BQM / RA-73231	64868	737-8MC (B738)
Pobeda	Russia	VP-BQQ / RA-73232	64869	737-8MC (B738)
<b>Qeshm Fars Air</b>	<b>Iran</b>	<b>EP-FAA</b>	<b>23502</b>	<b>747-281B (B742)</b>
Red Wings	Russia	VP-BVT	2107	A321-231 (A321)
Rossiia	Russia	VQ-BSR / RA-73191	33622	737-8AS (B738)
Rossiia	Russia	VQ-BSS / RA-73193	33602	737-8AS (B738)
Rossiia	Russia	VP-BOB / RA-73209	41236	737-8LJ (B738)
Rossiia	Russia	VP-BOI / RA-73223	41224	737-8LJ (B738)
Rossiia	Russia	VQ-BVU / RA-73189	41202	737-8LJ (B738)
Rossiia	Russia	VQ-BVV / RA-73187	41201	737-8LJ (B738)

Rossiya	Russia	VQ-BWJ / RA-73190	41212	737-8LJ (B738)
Rossiya	Russia	VP-BUS / RA-73208	44435	737-8MC (B738)
Rossiya	Russia	VQ-BPX / RA-73218	35278	737-8Q8 (B738)
Rossiya	Russia	EI-XLE / RA-73285	26362	747-446 (B744)
Rossiya	Russia	EI-XLF / RA-73286	27645	747-446 (B744)
Rossiya	Russia	EI-XLH / RA-73288	27650	747-446 (B744)
Rossiya	Russia	EI-XLJ / RA-73290	27646	747-446 (B744)
Rossiya	Russia	RA-73283	27100	747-446 (B744)
Rossiya	Russia	RA-73284	26360	747-446 (B744)
Rossiya	Russia	EI-UNL / RA-73279	28515	777-312 (B773)
Rossiya	Russia	RA-73282	28516	777-312 (B773)
Rossiya	Russia	RA-73292	28531	777-312 (B773)
Royal Flight	Russia	VQ-BTR	28171	757-28A (B752)
S7 Airlines	Russia	VQ-BVM / RA-73411	41400	737-8GJ (B738)
S7 Airlines	Russia	VQ-BMG / RA-73672	41841	737-8LP (B738)
S7 Airlines	Russia	VQ-BRK / RA-73671	41708	737-8LP (B738)
S7 Airlines	Russia	VQ-BRQ / RA-73670	41710	737-8LP (B738)
S7 Airlines	Russia	VQ-BRR / RA-73669	41836	737-8LP (B738)
S7 Airlines	Russia	VQ-BKV / RA-73665	37084	737-8ZS (B738)
S7 Airlines	Russia	VQ-BKW / RA-73664	37085	737-8ZS (B738)
S7 Airlines	Russia	VP-BWM / RA-73448	8852	A320-271N (A20N)
S7 Airlines	Russia	VQ-BRB / RA-72331	8367	A320-271N (A20N)
S7 Airlines	Russia	VQ-BDI / RA-73440	8103	A321-271N (A21N)
S7 Airlines	Russia	VQ-BDU / RA-73439	08088	A321-271N (A21N)
S7 Airlines	Russia	VQ-BGR / RA-73441	08571	A321-271N (A21N)
S7 Airlines	Russia	VQ-BDW / RA-73446	10540	A321-271NX (A21N)
Ural Airlines	Russia	VP-BDL / RA-73819	2343	A320-232 (A320)
Ural Airlines	Russia	VQ-BGI / RA-73817	5055	A320-232 (A320)
Ural Airlines	Russia	VQ-BGJ / RA-73818	2376	A320-232 (A320)
Ural Airlines	Russia	VP-BBH / RA-73842	2862	A321-231 (A321)
Ural Airlines	Russia	VP-BSW / RA-73798	7206	A321-231 (A321)
Ural Airlines	Russia	VP-BSY / RA-73797	7375	A321-231 (A321)
Utair	Russia	RA-73040	28917	727-524 (B735)
Utair	Russia	RA-73038	27331	737-425 (B735)
Utair	Russia	RA-73066	28474	737-45S (B734)
Utair	Russia	RA-73067	28476	737-45S (B734)
Utair	Russia	RA-73064	28549	737-46M (B734)
Utair	Russia	RA-73035	27315	737-524 (B735)
Utair	Russia	RA-73041	28920	737-524 (B735)
Utair	Russia	RA-73043	28626	737-524 (B735)
Utair	Russia	RA-73044	28900	737-524 (B735)

Utair	Russia	RA-73045	28901	737-524 (B735)
Utair	Russia	RA-73049	28906	737-524 (B735)
Utair	Russia	RA-73061	28907	737-524 (B735)
Utair	Russia	RA-73062	28908	737-524 (B735)
Utair	Russia	RA-73063	27532	737-524 (B735)
Utair	Russia	VP-BXY / RA-73037	27328	737-524 (B735)
Utair	Russia	RA-73085	32779	737-8AS (B738)
Utair	Russia	RA-73086	32780	737-8AS (B738)
Utair	Russia	VQ-BJF / RA-73084	32778	737-8AS(B738)
Utair	Russia	VQ-BJJ / RA-73087	29936	737-8AS(B738)
Utair	Russia	VQ-BQP / RA-73088	37553	737-8GU (B738)
Utair	Russia	VQ-BQQ / RA-73089	37552	737-8GU (B738)
Utair	Russia	VQ-BQR / RA-73090	36386	737-8GU (B738)
Utair	Russia	VQ-BQS / RA-73091	36387	737-8GU (B738)
Utair	Russia	VP-BAG / RA-73081	30435	767-224(ER) (B762)
Utair	Russia	VP-BAI/ RA-73082	30437	767-224(ER) (B762)
Yamal Airlines	Russia	VP-BCN/RA-73691	1993	A320-232 (A320)
Yamal Airlines	Russia	VQ-BSM / RA-73310	01967	A321-231 (A321)
Yamal Airlines	Russia	VQ-BSQ / RA-73689	1956	A321-231 (A321)

###