



UNITED STATES DEPARTMENT OF COMMERCE
Bureau of Industry and Security
Export Administration
Washington, DC 20230

November 3, 2025

Igor Nikolaevich Cherginets
Director-General
Belavia – Belarusian Airlines
14A, Nemiga Str., Minsk
Belarus, 220004

Dear Director-General Cherginets:

The Bureau of Industry and Security (BIS) is charged with administering the provisions of the Export Administration Regulations, 15 CFR 730-774 (EAR), which implement the Export Control Reform Act of 2018, 50 U.S.C. 4801-4852 (ECRA).

This authorization supersedes the prior authorization issued on October 10, 2025. Effective November 3, 2025, notwithstanding §§ 744.7 and 746.8 of the EAR, and pursuant to part 764 of the EAR and to ECRA, BIS authorizes the following activities:

1. Flights (*i.e.*, exports and reexports) of certain Belavia-Belarusian Airlines (Belavia) aircraft to and from any destination, including Belarus, subject to the terms and limitations below;
2. Servicing, maintaining, repairing, overhauling, and/or refurbishing certain Belavia aircraft, subject to the terms and limitations below; and
3. The export, reexport, or transfer (in-country) of certain equipment, supplies, and materials going to or for the use of certain Belavia aircraft, subject to the terms and limitations below.

This authorization applies to aircraft subject to the EAR and controlled under Export Control Classification Number (ECCN) 9A991.b, that are owned, leased, and/or controlled by Belavia, including but not limited to the nine aircraft listed below, collectively termed “Covered Aircraft” for purposes of this letter:

Aircraft Type	Registration	Serial Number
Boeing 737 MAX 8	EW-528PA	43344
Boeing 737-3Q8	EW-254PA	26294
Boeing 737-31S	EW-366PA	29058
Boeing 737-8ZM	EW-455PA	61421
Boeing 737-8ZM	EW-456PA	61422

Boeing 737-8ZM	EW-457PA	61423
Boeing 737-82R	EW-527PA	40877
Boeing 737-8K5	EW-544PA	35139
Boeing 737-8EV(BBJ2)	EW-001PA	33079

Terms and Limitations for Covered Aircraft Flights:

The export or reexport of Covered Aircraft is authorized, including to Belarus, with the following exceptions:

- This authorization does not permit flights to Cuba, Iran, North Korea, Syria, the Temporarily Occupied Crimea Region of Ukraine or the so-called Donetsk People's Republic or Luhansk People's Republic regions of Ukraine. Such flights may separately be eligible for authorization under a license or a License Exception under the EAR (*e.g.*, License Exception AVS for Syria, consistent with § 746.9);
- This authorization does not permit Covered Aircraft to be used for the transport of items subject to the EAR to any destination, except as authorized under the EAR (*e.g.*, under an export or reexport license or License Exception, if available, or as “no license required”). Such items include any items in support of Russia's war against Ukraine.

Terms and Limitations for Maintaining, Repairing, Overhauling, Refurbishing, and Servicing Covered Aircraft:

This letter authorizes all persons other than proscribed persons (as defined in part 772 of the EAR) to engage in the servicing, maintenance, repair, overhaul, and/or refurbishment of Covered Aircraft, including with items (including technology) subject to the EAR that have separately been authorized for export or reexport to Belarus or to, or for the use of, a Belarusian aircraft.

Terms and Limitations for Equipment, Supplies, and Materials Going to Covered Aircraft:

Notwithstanding § 744.7 of the EAR, this letter authorizes the export, reexport, and transfer (in-country) to or within third countries, except as specified below, of equipment, supplies, and materials to or for the use of Covered Aircraft, provided that those items are controlled for anti-terrorism (AT) reasons only or are designated EAR99. This letter does not authorize exports or re-exports of such items to Russia, Belarus, or countries in Country Group E (see Supp. No. 1 to Part 740 of the EAR). However, BIS will review license applications for commercial aircraft and aircraft-related items to, or for the use of, Belavia on a case-by-case basis to determine whether the items are for the maintenance and use of Belavia's commercial passenger fleet or the Covered Aircraft, or to otherwise support the normal commercial passenger operations of Belavia, and to guard against the risk of diversion to other unsupported end-uses or end-users. Items otherwise lawfully exported or reexported to Russia, Belarus, or Country Group E under a separate license or other authorization may be transferred to or for the use of Covered Aircraft under this authorization.

Note: Exports from the United States of equipment, supplies, and materials controlled only for AT reasons or designated EAR99 authorized under this letter should be declared on the

Electronic Export Information filed in the Automated Export System under the appropriate License Type Code to the country of destination (e.g., NLR/C33), even if it is known at the time of export that the items are going to or for the use of Covered Aircraft and would thus require a BIS authorization under § 744.7 of the EAR.

This letter provides authorization to engage only in the activities specified above. Other activities remain subject to the requirements or restrictions set forth in the EAR.

Additionally, nothing in this letter relieves any person from compliance with any other Federal laws, regulations, or requirements of other Federal agencies, including but not limited to those of the Department of the Treasury, Office of Foreign Assets Control (“OFAC”), 31 C.F.R. Parts 501-599, and the Department of State, Directorate of Defense Trade Controls (“DDTC”), 22 C.F.R. Parts 120-130.

This authorization remains in effect unless and until it is revoked by BIS.

For additional information regarding this authorization, please contact Joseph Cristofaro, Director of the Office of National Security Controls, via e-mail at Joseph.Cristofaro@bis.doc.gov.

Sincerely,

Kirsten Mortimer
Acting Director, Office of Exporter Services

cc: Office of Export Enforcement