

RIF

Rapid Safety Info

The Swedish Transport Agency has, through analysis of CZIB or other events, decided to issue the following safety recommendation to the operators concerned.

All Swedish AOCs have a system for managing risks according to ORO.GEN.200(a)(3) with recently clarified requirements in ED 2025/001/R AMC2 ORO.GEN.200(a)(3). In this system, all risks shall be identified, risk analysed and risk reduced in an appropriate manner. Flights to/from/over or in the vicinity of risk areas shall be managed in daily operations by the relevant AOC, which is responsible for ensuring that this is implemented.

Link to related CZIB number:

[2025-01](#) Airspace of the Russian Federation

[2022-01R11](#) Airspace of Ukraine

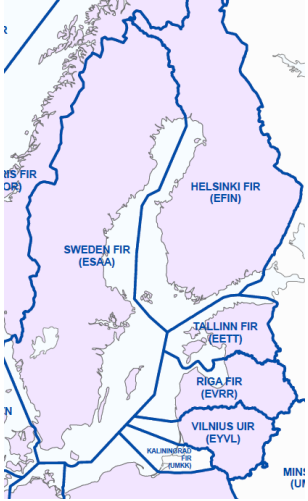
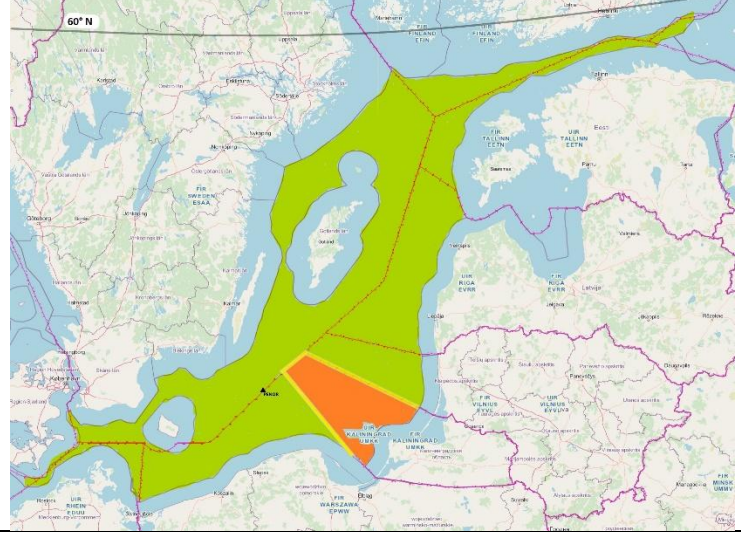
Event / Information from TS

Safety recommendation is based on a consideration of, among other things:

- Crash of Azerbaijan Airlines flight 8243 on 25 December 2024, ref [CZIB 2025-01](#)
- Risk for “both intentional targeting and misidentification of civil aircraft” near konfliktzones, ref [CZIB 2022-01R11](#)
- Multiple observations of Russian aircraft without transponders over the Baltic Sea, examples from open sources:
 - [Ryska bomflygplan identifierades av svenska Jas Gripen - Försvarsmakten](#)
 - [Svenska stridsplan i insats mot ryskt militärflyg | SVT Nyheter](#)
 - [Ryskt flygplan utanför skåne – ingen transponder](#)
- Security policy developments in relation to the airspace over the Baltic Sea:
 - [NATO to deploy drones, aircraft to counter wave of Baltic Sea cable attacks – POLITICO](#)
 - [France Decries Russian S-400 Radar Locking Onto Its Maritime Patrol Aircraft Over Baltic Sea](#)
- Previous open source assessment of spillover effects also relevant to the area concerned:
 - [Spillover Effect: New Airspace Risks in Europe – International Ops 2024 – OPSGROUP](#)
- Observed GNSS Jamming and Spoofing in affected region.
 - [EASA SIB No.: 2022-02R3](#)
- Proximity to Kaliningrad
 - [EASA EPAS MST.0024](#) ‘Due regard’ for the safety of civil traffic over high seas*
 - Several EU Member States had reported an increase in incidents involving close encounters between civil and military aircraft and more particularly an increase in non-cooperative international military traffic over the high-sea waters.
- Supplementary information on
 - [European Information Sharing and Cooperation Platform on Conflict Zones](#)
 - Assessment of risks related to “miscalculation and/or misidentification”
 - [ICAO EUR OPS Bulletin 2015_002](#)

*High seas airspace:

- [ICAO](#): Sovereignty and High Seas - The Convention on International Civil Aviation (Chicago, 1944) (“the Convention”) recognizes in Articles 1 and 2 that every State has complete and exclusive sovereignty over the airspace above its territory, i.e. the airspace above its land areas and adjacent territorial waters. Conversely, for airspace over the “high seas” as referred to in Article 12 of the Convention, State sovereignty does not apply and “... the rules in force shall be those established under this

Convention” (Annex 2 – Rules of the Air refers). This means that all waters beyond the territorial waters (12 NM) are considered as high seas, and that the airspace over the high seas is considered as international airspace from an aviation viewpoint. Other Open Sources: High Seas Airspace – What is it?	
Images below are for overview only, they do not define the safety recommendation below	
Source: Eurocontrol	Source: ICAO
	
Below is an excerpt from EASA ED 2025/001/R AMC2 ORO.GEN.200(a)(3) RISKS ASSOCIATED WITH FLYING OVER OR NEAR CONFLICT ZONES — CAT OPERATIONS WITH AEROPLANES (a) When intending to operate over or near conflict zones, an operator of commercial air transport operations with aeroplanes should conduct a risk assessment to properly identify, evaluate and manage the associated risks, and take appropriate risk-mitigation measures. The risk assessment and mitigation measures put in place should ensure that a flight does not commence or continue as planned unless it has been verified by every reasonable means available that the airspace containing the intended route from the aerodrome of departure to the aerodrome of arrival, including the intended take-off, destination and en-route alternate aerodromes, can be safely used for the planned operation. Note: The term ‘reasonable means’ is meant to denote the use, at the point of departure or while the aircraft is in flight, of information available to the operator either through official information published by the aeronautical information services or readily obtainable from other sources.	

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Safety recommendation from the Swedish Transport Agency

The Swedish Transport Agency recommends:

- Increased risk awareness over the areas in the Baltic Sea that can be defined as high seas* south of latitude 60° N

See map above for illustration

- A buffer zone should be applied to the Kaliningrad FIR in the affected area.
- Continuously updated risk analysis with risk reduction measures is applied when flying over the high sea regions of the Baltic Sea. Examples of measures, but not limited to:
 - Reinforced procedures for radio surveillance.
 - Ensure correct methodology in the event of radio failure or misunderstanding in connection with frequency change. [EUR OPS BULLETINS - All Documents](#)
 - Procedures such as increased use of external lights.
 - Process/Procedures for flight planning and navigation that include proactive risk reduction measures in the event of increased risk of GNSS Jamming – Spoofing.
 - T.E.M for visual surveillance.