FAA Background Information Regarding U.S. Civil Aviation – Libya

Due to the geographic expansion of the ongoing conflict between the Tripoli-based Government of National Accord and the Tobruk-based Libyan National Army (LNA) for control over Libya's government, territory and resources, the FAA assesses there is an unacceptable inadvertent risk to U.S. civil aviation operations at all altitudes in the territory and airspace of Libya. As a result, on 23 October 2019, the FAA published Notice to Airmen (NOTAM) KICZ A0026/19, prohibiting U.S. civil flight operations at all altitudes in the territory and airspace of Libya.

This all-altitude flight prohibition is in addition to Special Federal Aviation Regulation No. 112— Prohibition Against Certain Flights in the Tripoli Flight Information Region (FIR) (HLLL), which prohibits all flights by U.S. civil operators and airmen at altitudes below Flight level (FL) 300 in the entire Tripoli FIR (HLLL), which includes the international airspace over the southern Mediterranean Sea that is managed by Libya. Cumulatively, the result is that U.S. civil operators and airmen may only operate in the Tripoli FIR (HLLL) if they remain outside the territory and airspace of Libya and at altitudes at or above FL300, unless they have received an exemption or approval from the FAA.

The FAA is concerned about the risks to U.S. civil aviation from the expanding conflict, which includes international involvement. Foreign state actors continue to provide material and technical assistance to rival factions, including surface-to-air missile (SAM) systems, unmanned aircraft systems (UAS), and jamming equipment. Since mid-2019, each side has conducted air strikes, utilizing both tactical combat aircraft and long-range UAS. These attacks have targeted military air fields co-located with international civil airports. As a result, each side has employed anti-aircraft weapons to defend against these air strikes, as displayed in September, when the LNA reportedly shot down a foreign-operated UAS during an attempted attack on the airbase at Jufra.

Both sides in the Libyan conflict have increasingly employed UAS to conduct air strikes. Foreign-operated armed UAS have conducted multiple strikes on competing airports/airbases, resulting in the destruction of multiple parked aircraft, including civil transport aircraft. These strikes could lead to an increased air defense posture, including advanced SAM capabilities, to protect airport/airbase operations and/or fielded forces. Also, both GNA and LNA forces have access to advanced man-portable air defense systems (MANPADS), anti-aircraft artillery, and possible training, technical, and material support from international partners.

Both sides possess anti-aircraft artillery and man-portable air defense systems (MANPADS), some of which have a maximum altitude of 25,000 ft. However, more advanced, higher-altitude air defense systems are reportedly in Libya. As of mid-June, a Pantsir S-1 (SA-22) surface-to-airmissile (SAM) system was reportedly deployed to defend Jufra. The SA-22 has an effective range of 20 km (10.8 nm) and a maximum altitude of 15,000 m (49,000 ft). The SA-22 may be relocated in response to the dynamic threat environment, and may be repositioned to defend the base at Al Khadim with little or no warning.

During 2019, increased air strikes prompted GNA- and LNA-aligned forces to increase force protection measures, such as jamming, air strikes, and use of SAM systems capable of reaching as high as 49,000 ft. In addition, air strikes have also prompted LNA-aligned forces to redeploy long-range UAS and SAMs to locations outside the area of northwestern Libya where they had

previously been located. The re-location of these SAMs presents an inadvertent risk to U.S. civil aviation at altitudes above FL300. In addition, GNA- and LNA-aligned forces may expand their use of UAS air strikes to attack opposition aircraft at airbases that are usually co-located with international civil airports, presenting a risk to civil aircraft operating at or near such airports. While the anti-aircraft capabilities and jamming are likely intended to defend against military aircraft, an inadvertent risk remains for U.S. civil aviation operations at all altitudes in the territory and airspace of Libya due to potential miscalculation or misidentification and the mobility of some of the advanced weapons systems involved. Increased foreign involvement has resulted in increased inadvertent risk to U.S. civil aviation operations due to command and control and airspace deconfliction challenges, increased lethality of UAS operations, and the introduction of more advanced, higher-altitude anti-aircraft systems.

The FAA will continue to monitor risks to U.S. civil aviation operating the territory and airspace of Libya and the Tripoli FIR (HLLL) and make adjustments to its prohibition on U.S. civil aviation operations as necessary.

Posted: 23 OCT 2019