

Regulatory Instruction

Date: 08 Feb 22

MAA/RI/2022/01 – Clarification regarding members of the Regulated Community holding multiple roles which require suitable separation and independence

Issue

1. A need to clarify the requirements for separation and independence between key Airworthiness role holders has been identified. This Regulatory Instruction (RI) provides additional information to support Accountable Managers (AM) in making Airworthiness appointments.

Scope

2. This RI provides detail to support the appointment and endorsement of Military Continuing Airworthiness Manager (Mil CAM)¹, Type Airworthiness Manager (TAM)² and Independent System Monitoring (ISM) roles.

Aim

3. To provide additional guidance to AMs on the requirements for separation and independence of the Mil CAM, TAM and ISM roles.

Implementation

4. This RI is effective immediately and will be cancelled after review of the relevant elements of the MAA Regulatory Publications.

Background

5. Regulated Entities have requested clarification from the MAA regarding Regulatory non-compliances for individuals in the Mil CAM, TAM and ISM roles. This request highlighted to the MAA that, with the introduction of the TAM role via the RA 1160 Series, there may be a conflict of interest for certain operating frameworks.

6. The Mil CAM is a Suitably Qualified and Experienced Person who is responsible and accountable for Continuing Airworthiness decisions (ie ensuring the Air System is compliant with the applicable Airworthiness requirements and is in a condition for safe operation).

7. TAM are Suitably Qualified and Experienced Persons who are responsible and accountable for Type Airworthiness decisions (ie Initial Airworthiness and the sustainment of Type Airworthiness).

8. The ISM role is filled by a Suitably Qualified and Experienced Person who is responsible and accountable for the provision of independent system monitoring activities to the Head of Design Organization (HDO)³.

¹ Refer to RA 1016 – Military Continuing Airworthiness Management.

² Refer to RA 1015 – Type Airworthiness Management – Roles and Responsibilities.

³ MAA02: "The AM equivalent within Design Approved Organizations is the "Head of Design Organization."

Requirements

9. To effectively fulfil the responsibilities of these Airworthiness roles:
 - a. Clear independence is required between those discharging the Mil CAM and TAM responsibilities.
 - b. Clear independence is required between those discharging TAM and ISM responsibilities.
 - c. The HDO may also hold the TAM role where sufficient capacity and clear separation of the responsibilities can be demonstrated.

Transitional Arrangements

10. There are no transitional arrangements associated with this RI.

Queries

11. Any observations or requests for further guidance on the content of this RI should be submitted by email to DSA-MAA-MRPEnquiries@mod.gov.uk.

MAA Head Regulation and Certification