

**30 Mar 2022**

## **MAA/RN/2022/01 – Transition of Regulatory Article (RA) 1220 to the 5000 Series**

References:

A. RA 1220 – Delivery Team Airworthiness and Safety.

### **Issue**

The 1200 Series RAs have been reviewed as part of the MAA 1200 Series Coherency Multi-Disciplinary Team (MDT). The significant change, from this project, is that RA 1220 will be withdrawn later this year and be replaced by new RAs in the 5000 Series. The MAA recognizes that the Regulated Community (RC) would benefit from additional explanation of the change(s) to help with their review of the new 5000 Series RAs during the Notice of Proposed Amendment period.

### **Scope**

This RN explains the rationale behind the change and how RA 1220 has been mapped across to the 5000 Series.

### **Aim**

This RN is applicable to the MAA Regulated Community, specifically those responsible for, or involved in, Type Airworthiness (TAw) and Commodity / Equipment Air Safety Management.

### **Implementation**

This guidance is effective immediately.

### **Background / Introduction**

The MAA 1200 Series MDT was initiated in 2021 to exploit the opportunity posed by individual 1200 Series RAs requiring their annual review. The combined review created the opportunity to improve clarity, consistency and coherency within the 1200 Series RAs and any associated manuals. The result will better align an Air System Safety Case with its associated Air Safety Management System, thus reducing any actual or perceived burden on resource involved in this critical component of Air Safety.

It was swiftly identified this project would require external assistance from across the Regulated Community, and so volunteers from MOD and Industry supported both the analysis and review of RAs identified as 'in scope' for the project<sup>1</sup>. From this, it became clear that the contents of RA 1220 would better fit in the 5000 Series and would provide better clarity if broken out into an individual RA<sup>2</sup> whilst delivering the same overall direction. The MDT was also cognisant of the work being carried out under the ASPIRE Project and strove to accommodate this as a valid method of complying with the revised RAs accordingly.

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<sup>1</sup> RA 1200 - Air Safety Management, RA 1205 - Air System Safety Cases, RA 1210 - Ownership and Management of Operating Risk (Risk to Life), RA 1220 - Delivery Team Airworthiness and Safety, and RA 1225 - Air Safety Documentation Audit Trail.

<sup>2</sup> This especially applies to clarifying any differences for Airworthiness / Air Safety responsibilities between platform and Commodity / Equipment Delivery Teams.

## Transition / Mapping

The transition of RA 1220 into the 5000 Series RAs can be simply explained pictorially:

<b>Contents</b>	1220(1): Airworthiness Strategy 1220(2): Project Safety Management 1220(3): Equipment Safety Assessment 1220(4): Independent Evaluation and Audit 1220(5): Support Policy Statement
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*These elements relate to Type Airworthiness, and can be held within TAE 5000 series. RAs have been separated to clearly align rationales and purpose.*

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*This detail has been incorporated into the content of 1220(2) and 1220(3).*

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*SPS has been moved into TAE 5000 series ("supply of technical information") as a requirement for the TAA to coordinate.*

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*Commodity requirements were "shoehorned" into RA 1220. A distinct RA is appropriate to specifically detail the requirements.*

Thus, the new TAW and Safety Management Structure in the 5000 Series will become:



### Transitional Arrangements

There are no transitional arrangements for this RN; however, there is likely to be a transitional period required to allow for the impact of the withdrawal of RA 1220 and implementation of the new 5000 Series RAs. This will be detailed in a subsequent RN, to be released in line with the associated NAA.

### Additional Information

The following sections of this RN provide additional information on areas identified by the MAA during the consultancy phase of the 1200 Series Coherency MDT that would benefit from further explanation and clarification.

### Hazard Management

The MAA recognizes the transition, within part of the Regulated Community, from using eCassandra to manage Hazards to using Bow Tie techniques and terminology. This has introduced the term “Equipment Contribution to Risk to Life (ECtRtL)” and, in doing so, altered the understanding of the term “Hazard”. The MDT charged with reviewing the 1200 Series RAs has decided not to enforce the use of Bow Ties to manage the Risk to Life in RA 1210; however, it is recognized a number of Aviation Duty Holders (ADH) / Accountable Managers (Military Flying) (AM(MF)) have chosen this methodology. The new 5000 Series RAs will similarly not mandate the use of such terminology and the generic term “Hazard Management” will continue to be used, as the Type Airworthiness Authority (TAA), Type Airworthiness Manager (TAM) and Commodity Chief Engineer (CE) continue to play an active role in managing Hazards.

Hazards are an integral component of the MAA02 definition of Airworthiness, and active management activity includes declaring Hazards leading to Risk to Life (RtL) to the relevant ADH / AM(MF) for management in accordance with RA 1210. This decision is aligned with Defence Standard 00-056<sup>3</sup> and the Civil Aviation Authority and also accounts for industry members of the RC. This does not prohibit individual areas of the RC from specifying local methods of meeting the regulatory requirement.

### New definitions for Commodity Delivery Team (DT)

RA 5013 contains new definitions for both a Commodity DT and a Commodity CE. These definitions clarify that the RA is applicable to a broad scope of DTs providing a wide range of equipment and commodities. This includes those Air System DTs responsible for providing or managing equipment (such as engines) in support of other DTs.

<sup>3</sup> Refer to Defence Standard 00-056 – Safety Management Requirements for Defence Systems.

RA 5013 details the regulatory requirements for all such DTs and provides further guidance on appropriate tailoring of the requirements, in a manner proportionate to the RtL presented by the commodity.

### **Support Policy Statement (SPS)**

It is acknowledged that much of the information contained within the SPS will be provided to a TAA by other organizations. However, the deliberate move of SPS requirements to RA 5407 reflects and emphasizes the TAA's responsibility to coordinate this information and maintain it.

### **Queries**

Any observations or requests for further guidance on the content of this RN should be submitted by email to [DSA-MAA-MRPEnquiries@mod.gov.uk](mailto:DSA-MAA-MRPEnquiries@mod.gov.uk).

### **MAA Head Regulation and Certification**