Guidance for the initial approval (and revision) of an organization under the Contractor Flying Approved Organization Scheme (Basic Remotely Piloted Air Systems) (CFAOS(BR))

## Introduction

- 1. The Military Aviation Authority (MAA), as the competent authority, is required by the Secretary of State for Defence to introduce internal standards and management arrangements that produce outcomes that are so far as reasonably practicable at least as good as those required by legislation.
- 2. The MAA shall have full oversight of all Defence aviation activity and undertake the role of the single regulatory authority responsible for regulating all aspects of Air Safety across Defence.
- 3. The implementation of these standards and management arrangements for organizations operating Remotely Piloted Air Systems (RPAS) in the Open Category and Specific S1 sub-category will involve such organizations being approved for the purposes of Defence Contractor Flying in accordance with MAA Regulatory Publication (MRP) Regulatory Article (RA)1031.

## Reference

4. Full details of the requirements can be found in the MRP - the specific RA detailing CFAOS(BR) being RA 1031.

## **CFAOS(BR) Initial Approval Process**

5. A MAA Form 2 (for CFAOS(BR)) should be completed and submitted to the MAA CFAOS Branch. A copy of the MAA Form 2 (CFAOS(BR)) can be found on the MAA Website. Applications, signed by the appropriate MOD Sponsor and the organization's RPAS Accountable Manager (RPAS AM), should be sent to:

By email: DSA-MAA-OpAssure-CFAOS-Group@mod.gov.uk

By post:

Military Aviation Authority
FAO Operating Assurance (CFAOS(BR))
Juniper 3 # 5102
Abbey Wood North
BRISTOL
BS34 8QW

6. On receipt of an application the MAA CFAOS Branch will acknowledge the application and issue a unique company identifier for MAA tracking purposes; an MAA CFAOS(BR) Lead will also be nominated at this time. If not already submitted with the MAA Form 2, the applicant organization will also be requested to submit their Contractor Flying Organization Exposition (Basic Remotely Piloted Air Systems) (CFOE(BR))<sup>1</sup> and any relevant supporting

<sup>&</sup>lt;sup>1</sup> The MAA has produced a CFOE(BR) template to be used by organizations; this is available on the MAA Website at the CFAOS(BR) Approvals page.

documentation (such as the MAA RPAS Leter of Endorsed Categorization<sup>2</sup> (RPAS LEC) and the Categorization Safety Checklist<sup>3</sup>).

- 7. The initial approval process will begin with a desk-top review by an MAA CFAOS approval team of the applicant organization's CFOE(BR) and any supporting documentation. The purpose of this review is to identify whether the CFOE(BR) and other documents adequately detail how the applicant organization will meet the regulatory requirements, and provides an early indication of whether compliance with regulation is being met. Following the desk-top review, feedback will be provided to the organization, enabling them to amend documents as required. Thereafter, the MAA CFAOS approval team will review a resubmitted CFOE(BR) and supporting documentation as required and, at an agreed date, conduct an appropriate assessment visit to the organization concerned in order to confirm that the CFAOS(BR) Organization is compliant with the relevant RAs, and that the MAA is satisfied with the organization's processes and procedures. This visit will take the form of a series of interviews with the organization's CFAOS(BR) staff, in order for said staff to demonstrate how compliance with the applicable regulations, the CFOE(BR) and local procedures will be achieved. This is all required before an initial approval is issued (and may be required for a change to an existing approval).
- 8. Any non-compliances, non-conformances and / or observations identified, whether during the desk-top review or visit, will be recorded as findings (non-compliances and non-conformances will be classed as Corrective Action Requirements (CARs) necessitating formal action to close). The organization will be briefed on findings content on completion of the on-site visit. The MAA approval team will then prepare and staff an approval report, including findings, for issue to the organization within 20 working days (approximately 1 calendar month) of completion of the on-site visit.
- 9. If no findings are identified during the desk-top review or visit, then a recommendation for an approval will be made to the appropriate MAA endorsing officer and, subject to their acceptance of the report, an approval certificate will be issued.
- 10. When CARs have been identified, the organization will be required to present the MAA with a Corrective Action Plan (CAP) for CAR closure. The MAA will subsequently agree a timeline for CAR closure. The expectation is that all CARs should be closed prior to the issue of an approval; however, on occasion an appropriate route to CAR closure can be agreed and approval issued with CARs remaining open. When the MAA is satisfied that all necessary actions have been taken a recommendation for an approval to be issued will be made to the MAA endorsing officer and, if they are content, an approval certificate will be issued.
- 11. The operation of RPAS under the CFAOS(BR) can only occur once an approval certificate has been issued.
- 12. The MAA will then implement an appropriate oversight and surveillance plan for the continuation of the approval.
- 13. Figure 1 below provides a flowchart depicting the process for an initial approval.

<sup>&</sup>lt;sup>2</sup> The requirement for an RPAS LEC, specific against an RPAS type / model, is separate to the CFAOS(BR) approval process; refer to RA 1600 – Remotely Piloted Air Systems for detail regarding RPAS LECs.

<sup>&</sup>lt;sup>3</sup> The requirement for a Categorization Safety Checklist, specific against an RPAS type / model, is separate to the CFAOS(BR) approval process; refer to RA 1600(1) and Annex B to RA 1600 for detail regarding Categorization Safety Checklists.

## Change to an Organization's Extant CFAOS(BR) Approval

- 14. Whenever a change to the scope of an organization's approval is proposed, an amended MAA Form 2 (CFAOS(BR)), updated CFOE(BR) and supporting documents (MAA LEC and Categorization Safety Checklist) which detail the change must be submitted to the MAA CFAOS Branch according to the processes detailed at paragraphs 5 and 6. The nominated MAA CFAOS(BR) Lead will acknowledge receipt. The MAA Lead will then review the extent of the proposed change, determine its effect on the approval and establish whether an assessment visit to the organization is required.
- 15. If a visit is not required, the MAA Lead will review all documentation relating to the proposed change and assess whether or not compliance with the regulations has been maintained. If compliance has been maintained, then a recommendation for an updated CFAOS(BR) Certificate to be issued will be made to the appropriate MAA endorsing officer and, if content, an updated CFAOS(BR) Certificate will be issued.
- 16. If an assessment visit by an MAA CFAOS approval team is required this will take the form of a series of interviews with the organization's CFAOS(BR) staff, in order to confirm that the CFAOS(BR) Organization will remain / be compliant with the relevant RAs, and that the MAA is satisfied with the organization's processes and procedures related to the change. The processes detailed in paragraphs 8 to 10 will be followed if any potential non-compliances, potential non-conformities and / or observations are identified.
- 17. Operation of RPAS under the proposed change can only occur following the issue of an appropriately amended approval certificate. Similarly, the organization can only operate in accordance with the updated CFOE(BR) once the proposed change has been agreed by the MAA.
- 18. <u>Figure 2</u> below provides a flowchart depicting the process for a proposed change to a CFAOS(BR) approval.

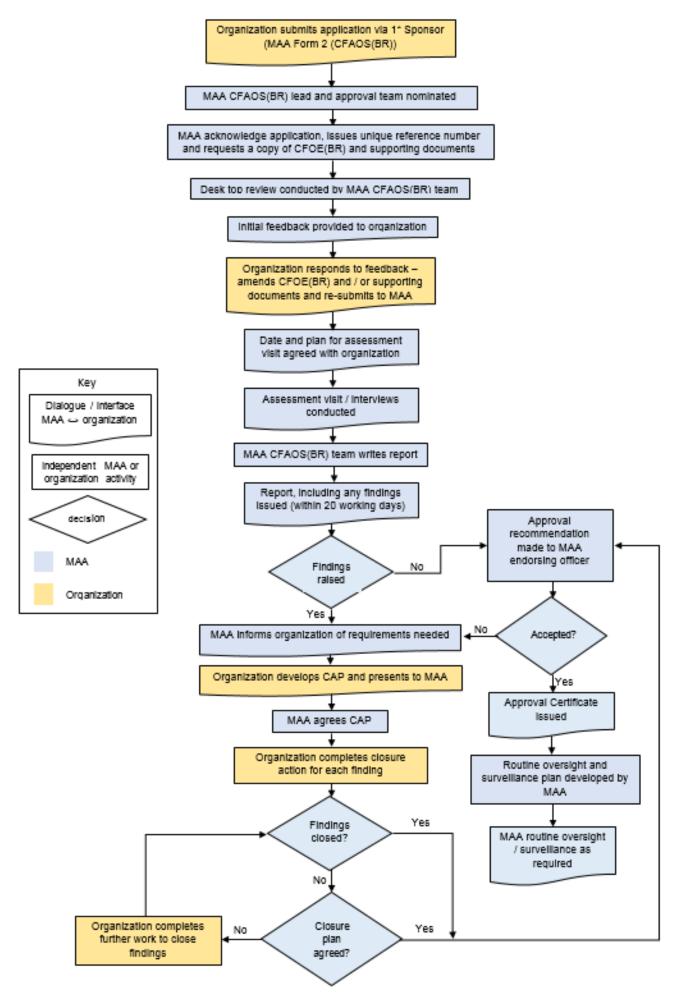


Figure 1 – CFAOS(BR) Initial Approval – Process Flowchart

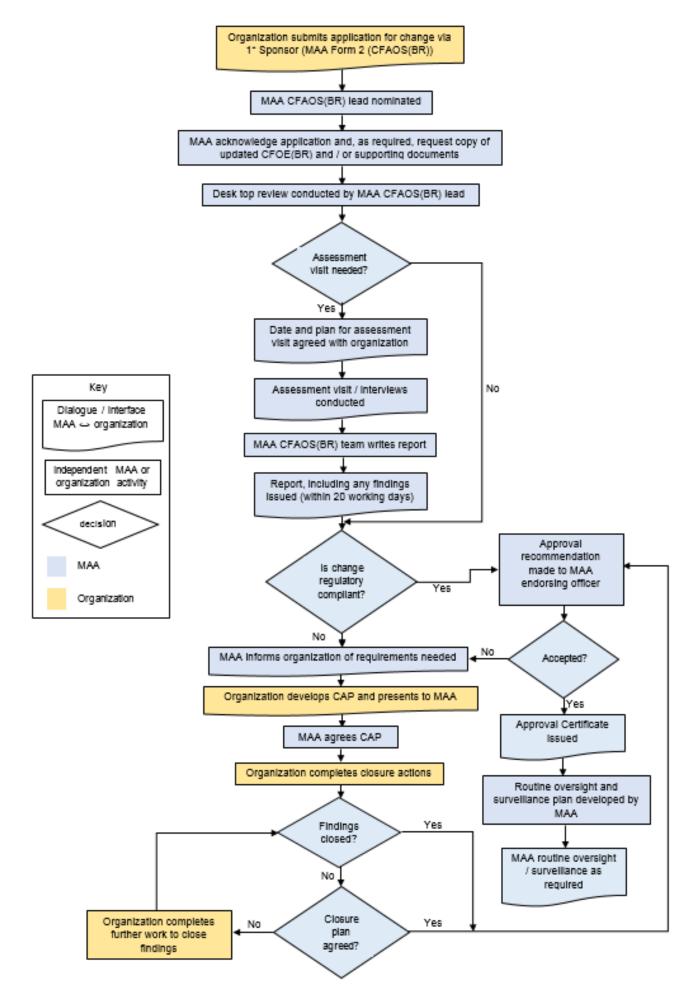


Figure 2 - Change to an Organization's Extant CFAOS(BR) Approval - Process Flowchart