Defence Safety Authority

MAA01: Military Aviation Authority Regulatory Principles

Military Aviation Authority

Military Aviation Authority
MAA

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FOREWORD

Good Regulations are key to appropriate and proportionate regulatory activity; MAA01 is the capstone document for the Military Aviation Authority (MAA) Regulatory Publications (MRP) setting the tone and context on how this will be achieved.

I am personally committed to enhancing operational capability through Continuous Improvement of the MAA with a focus on improved Safety, Quality and Environmental Protection. Key to this is the continued development of a widespread engaged Safety culture and greater sharing of information through effective knowledge exploitation.

To enable the MAA's Vision as the world leading Air Safety Regulator we will continue to engage with the community and other regulatory bodies to ensure that our activity remains agile whilst minimizing burden. Empowered by the Defence Safety Authority (DSA) Charter from the Secretary of State for Defence (SofS), the MAA is required to regulate UK Defence Aviation activity, assure the safety and delivery of military aviation capability and enforce adherence to the appropriate and effective Regulations. I sincerely believe that the management of Risk to Life (RtL) is sufficiently mature, and while formal advice and corrective actions will be of benefit for improvement, more severe Enforcement such as the issue of Prohibit Notices will rarely be needed.

The MAA will also continue to develop aviation related Environmental Protection Regulations and the Assurance of environmental management and protection across the Air Domain.

Having transitioned to conducting Risk-based activity, my goal is for the MAA to mentor and guide the Defence Aviation community effectively, while maintaining its independence and impartiality. We will continue to develop our people, support other Assurance organizations and improve the knowledge exploitation to enable transparency and support the Risk-based Assurance model.

Our broad engagement through training activity, stakeholder liaison and international fora enables us to identify and share good practice across the Defence Air Environment[1] (DAE) and to foster appropriate culture. I ask you all to engage and contribute to the evolution of the MAA and help to move us towards our Vision of being the world leading Air Safety Regulator.

This document underpins my commitment to improving Air Safety and aviation related Environmental Protection across the Defence Aviation[1] community and outlines the MAA's role in achieving it.

Alan Gillespie

A Gillespie

Air Vice-Marshal

Director Military Aviation Authority

►Mar 2024◄

[1] Refer to MAA02: Military Aviation Authority Master Glossary.

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Chapter 1: Defining the UK Military Aviation Authority

Legal and Policy Framework

1. The authority to operate and regulate UK military Air Systems[2] is vested in the SofS. Notwithstanding the fact that the majority of provisions of the Air Navigation Order (ANO)[3] do not apply to military Aircraft, the Crown / Defence Contractor Flying Organization could be liable in common law if it were to operate its Air Systems negligently and cause injury to persons or damage to property or the environment. Furthermore, individuals could be criminally liable if there are significant breaches of the obligations placed upon them. The SofS's Health, Safety and Environment Protection (HS&EP) policy statement[4] requires that where Defence has Disapplications, Exemptions or Derogations (DEDs) from HS&EP legislation, we maintain Departmental arrangements that produce outcomes that are, so far as reasonably practicable, at least as good as those required by UK legislation.

2. The ANO, as a Statutory Instrument made pursuant to the Civil Aviation Act (1982), regulates air navigation in the UK. By virtue of Article 22 of the ANO 2016 (as amended) the majority of the provisions of the ANO do not apply to military Aircraft. The ANO defines military Aircraft as any of the below:

   a. The naval, military or air force Aircraft of any country.

   b. Any Aircraft being constructed for the naval, military or air force of any country under a contract entered into by the SofS.

   c. Any Aircraft for which there is in force a certificate issued by SofS that the Aircraft is to be treated for the purposes of this Order as a military Aircraft.

3. For all statutory and common law aspects of HS&EP, reference must be made to DSA01.1[5]. This amplifies the SofS's policy statement for HS&EP and the strategic principles, duties and governance for HS&EP to be applied throughout the Ministry of Defence (MOD) and also articulates the legal requirements imposed upon the MOD and its personnel.

The UK Military Aviation Authority

4. In support of legal requirements, the SofS has established, by Charter[6], the UK's DSA to be responsible for all Defence Safety and Environmental Protection Regulators. As part of the DSA, the MAA regulates all Defence Aviation activities. This is achieved through the establishment and maintenance of an appropriate regulatory framework that is given effect by certification and Assurance processes extending across the Acquisition, operating and Continuing Airworthiness domains within the Defence Aviation community. The MAA also facilitates Continuous Improvement in the MOD's Air Safety and aviation related Environmental Protection performance and assures compliance with extant safety and environmental standards and regulatory requirements. Independent surveillance of relevant planning and programming processes is also used to support the Assurance process. The MAA is, however, independent of the Acquisition, operating and capability delivery areas of Defence Aviation activities.

5. Although there can be a cost to improving Air Safety, this must be balanced against the practical loss of operational capability from Safety related Incidents. Indeed, both common law and the Health and Safety at Work Act (HSWA) (1974) require Safety Risks to be As Low As Reasonably Practicable (ALARP) and Tolerable. The MAA provides policy, standards, arrangements and scrutiny to ensure an acceptable balance is maintained between the

[2] The ANO defines military Aircraft which by definition includes the airborne capable elements of any military Air System.
[3] Refer to The Air Navigation Order 2016; and CAP 393 – "Regulations made under powers in the Civil Aviation.
Act 1982 and the Air Navigation Order 2016", 2021, Civil Aviation Authority (CAA).
[4] https://www.gov.uk/government/publications/secretary-of-states-policy-statement-on-safety-health-environmental-protection-and-sustainable-development.
[5] Refer to DSA01.1 – The Defence Policy for Health, Safety and Environmental Protection.
[6] ►https://www.gov.uk/government/organisations/defence-safety-authority/about.◄

achievement of operational capability and the Safety Risks associated with Defence Aviation activity.

6. Similarly, there is also often a cost involved with aviation related Environmental Protection, which must be balanced against preserving a habitable world for future generations and the best practicable environmental options should be implemented. Where measures for improving Air Safety conflict with those for Environmental Protection, this should be considered on a case-by-case basis, by means of fully evidenced safety and environmental cases.

MAA Vision

To be ►a World Class◄ Air Safety Regulator.

MAA Purpose

To enhance operational capability by delivering effective Air Safety ►Regulation and facilitating safe innovation;◄ fostering good practice and appropriate culture across the Defence Air Environment.

Strategic Direction

7. The MAA will proactively identify and assess the implications of wider strategic change on sustaining Air Safety and aviation related Environmental Protection. The MAA's activities must be innovative; continually striving to reduce RtL and environmental Risk without unduly stifling the operational flexibility, agility and initiative that Aviation Duty Holders (ADH)[7], Accountable Managers (Military Flying) (AM(MF)) and Operational Commanders require to meet these challenges. The MAA will continue to evolve the vision of a more holistic approach to Air Safety and aviation related Environmental Protection Regulation.

Key Principles of Air Safety and Aviation Related Environmental Protection Regulation

8. The Regulation of Defence Aviation is underpinned by 4 key principles[8].

a. **Leadership**. There must be strong leadership from the very top, demanding and demonstrating by example active and constant commitment to Air Safety and aviation related Environmental Protection as overriding priorities.

b. **Independence**. There must be thorough independence throughout the regulatory regime, in particular in the setting of Air Safety and aviation related Environmental Protection Regulation, auditing and Enforcement.

c. **People**. There must be greater focus on people, than on process and paper, in the delivery of high standards of Air Safety and aviation related Environmental Protection.

d. **Simplicity**. Regulatory structures, processes and rules must be as simple and straightforward as possible so that everyone can understand them.

9. The MAA develops, promulgates and enforces a regulatory framework to promote an active Air Safety and environmentally aware culture and assure appropriate standards are being met in the delivery of Air Safety and aviation related Environmental Protection through an independent end-to-end Assurance process. The MAA, thereby, provides Assurance to the Director General (DG) DSA who in turn assures the SofS that high standards of Air Safety and Environmental Protection are maintained in the conduct of Defence Aviation.

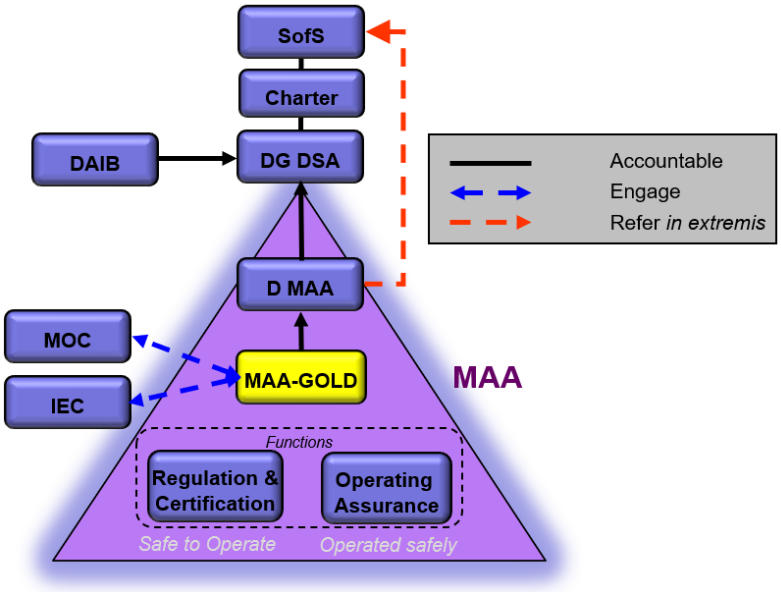
Governance

10. The MAA is the Defence Aviation Regulator and works alongside the other Defence regulators, within the DSA, to the DG. The MAA is governed at the strategic level by a Director MAA (D MAA) - chaired MAA-GOLD (Command Board), its membership comprising MAA Director

[7] The term "ADH" consists of three levels of Duty Holder (DH) coverage: Senior DH (SDH), Operating DH (ODH), and Delivery DH (DDH).
[8] https://www.gov.uk/government/publications/the-nimrod-review.

(Technical) (D (Tech)) and Group Heads. An MAA Operators' Council (MOC) comprising senior stakeholders drawn from the military operating community and which may, at the discretion of D MAA, from time to time include representation from Industry, provides a consultative forum and the means by which senior stakeholders can offer views on Air Safety strategy, policy and standards. ►An Industry Engagement Council (IEC), an industry facing MOC equivalent,◄ supports and informs the MAA-GOLD on Air Safety issues through consultation with the aerospace industry. Figure 1-1 below provides a schematic representation of the various interactions and relationships.

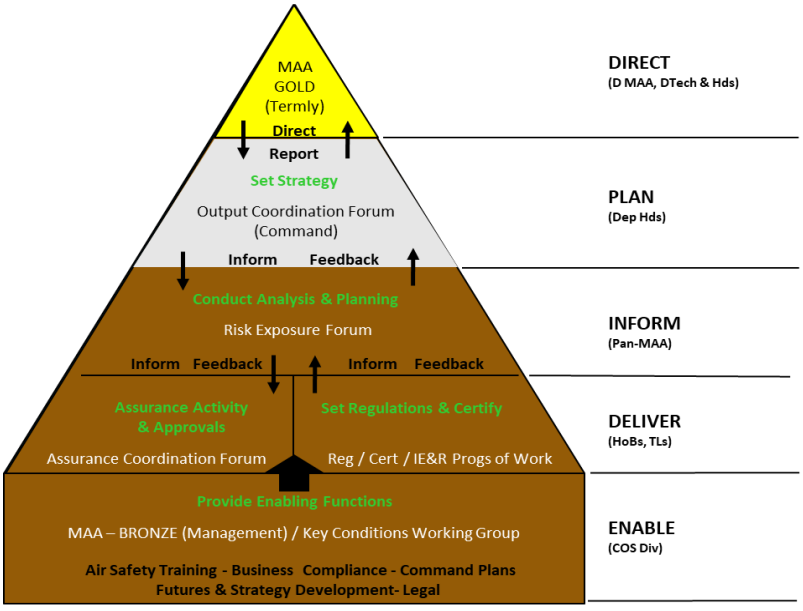
Figure 1-1: Governance Structure



MAA Operating Model

11. The MAA operates to a model (see Figure 1-2) which directs through (MAA-GOLD) a plan (MAA-Output Coordination Forum (Command) (OCF)(C)) to inform and deliver, all supported by enabling functions (MAA-BRONZE) to achieve Regulation, Certification, Enforcement and Assurance through an organizational structure (see Figure 1-3).

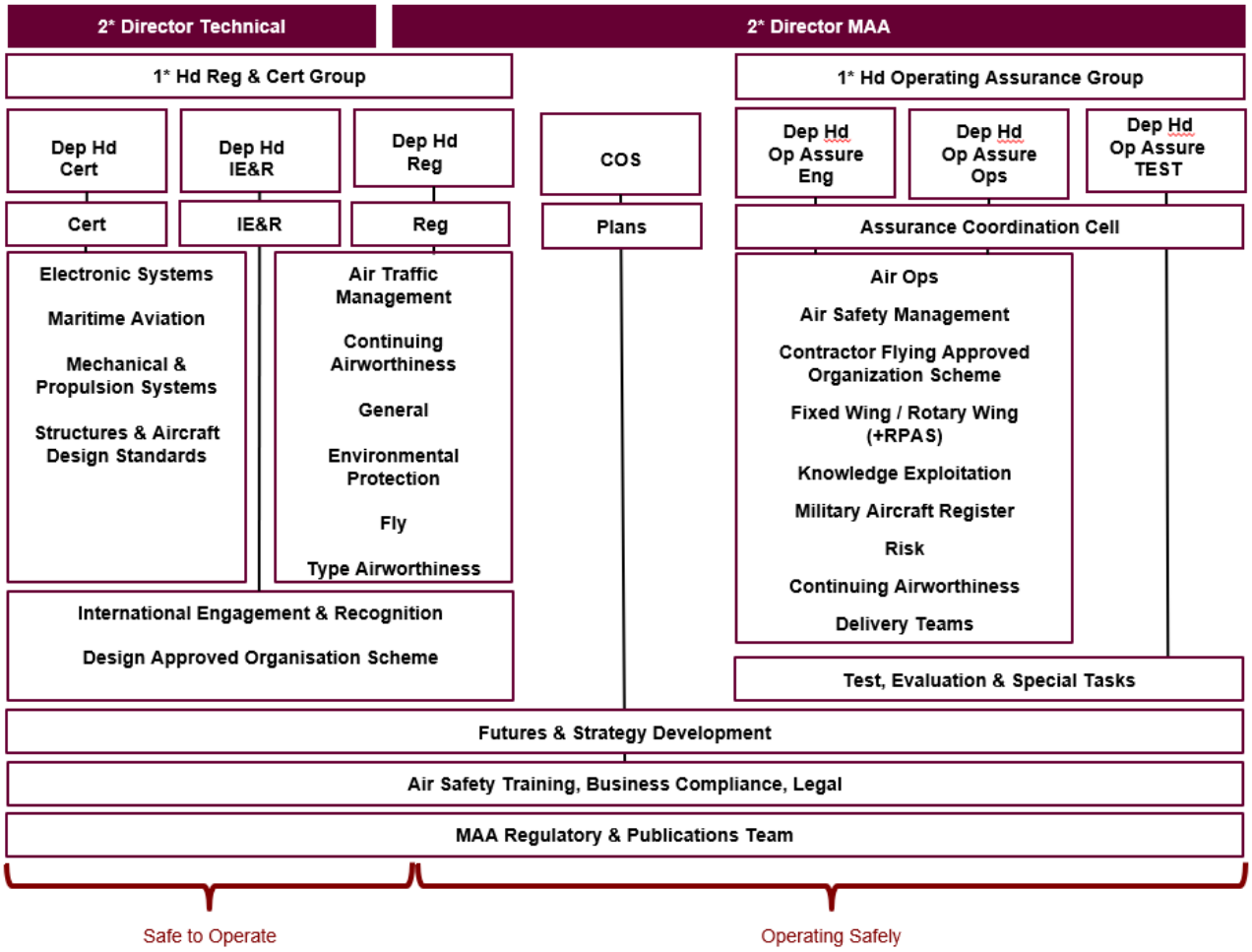
Figure 1-2: MAA Operating Model



12. **MAA Command.** The MAA Command is the collective term for the D MAA, D(Tech) and Group Heads, who are responsible for directing the organization, setting strategy and prioritizing outputs to ensure delivery of MAA outcomes.

a. The organization (Figure 1-3) is headed by D MAA who provides leadership and direction to the MAA to enable the organization to effectively fulfil its role as a Risk-based regulator. D(Tech) advises D MAA on specific technical matters, particularly relating to Regulation and Certification. To achieve its mandated output, the organization is split into two groups: the Operating Assurance Group and the Regulation and Certification Group; each led by a 1 Star Head. The Executive team is directly supported by an OF5 Chief of Staff (COS) who leads the functional area.

Figure 1-3 – MAA Structure



b. **Regulation and Certification (Reg & Cert) Group.** The Reg & Cert Group, on behalf of D MAA, has responsibility for the development, Maintenance and promulgation of through-life Airworthiness, Flying, Air Traffic Management (ATM), and aviation related Environmental Protection Regulations, Standards and associated publications. The Group also has responsibility for the Certification of all new military Air Systems and major changes to Type Design; ►◄ the sponsorship, management and Maintenance of UK Air System design and Airworthiness standards; Assurance of Air Traffic Management Equipment; and Assurance of the Safety of ships' aviation facilities. The International Engagement and Recognition (IE&R) team engages with civil and military aviation organizations around the world, as well as undertaking the military Airworthiness regulatory comparative process known as Recognition. As part of the wider MAA Approvals system Hd Reg & Cert manages the Design Approved Organization Scheme (DAOS), the approval of Type Airworthiness Authority (TAA) / Type Airworthiness Manager (TAM) assessments, and the issue of Letters of Endorsement.

c. **Operating Assurance Group (OAG).** The OAG conducts Risk-based Assurance of platforms and organizations which directly, and indirectly, affect Air Safety and aviation related Environmental Protection. It also manages the Military Aircraft Register (MAR) and assures the SofS via the D MAA that the design, Airworthiness, operation and Maintenance of UK military-registered Air Systems are acceptably safe in terms of RtL and pose the minimum practicable Risk to the environment. Furthermore, it operates a number of Approved Organization Schemes (AOS): Contractor Flying (CFAOS), ATM Equipment (AAOS), Maintenance (MAOS), and Continuing Airworthiness Management Organization (CAMO); it also endorses key individuals with Air Safety responsibilities. The Assurance Coordination Cell (ACC) coordinates Assurance activity and facilitates structured and enhanced inter-Group communication, such that all OAG personnel have an increased awareness of Risk exposure within the Defence Aviation community. In addition, the ACC facilitates Quality Checks of the OAG output.

d. **COS Area.** The COS Area provides the enabling functional support to the MAA and is the focal point for: Futures and Strategic Development; Command Plans; Business Compliance; Resource Management; Quality management; and, Training, both external (Air Safety Training) and internal (individual mandated training). Included in the COS Area is the LEGAD, who provides legal advice to D MAA and staff across all the areas of the MAA.

Convening Authority - Defence Safety Authority

13. The policy for Service Inquiries (SI) can be found in the ►JSP 815◄[9].

Definitions

14. **Environmental Protection**. Environmental Protection is defined in the UK Environment Bill[10] as:

a. Protection of the natural environment from the effects of human activity;

b. Protection of people from the effects of human activity on the natural environment;

c. Maintenance, restoration or enhancement of the natural environment; and

d. Monitoring, assessing, considering, advising or reporting on anything in paragraphs a to c.

[9] Refer to ►JSP 815 – Defence Safety Management System.◄
[10] Environment Act 2021 - Parliamentary Bills - UK Parliament.

Chapter 2: How the MAA Regulates

Assurance Principles

1. The primary objective of MAA Assurance activity is the assessment of the effectiveness of the relevant Air Safety Management System (ASMS), Environmental Management Systems (EMS) and associated subordinate and superior Assurance processes. There are 6 Assurance principles that underpin the gathering of compliance and Assurance evidence of Air Safety and aviation related Environmental Protection activity across the Defence Aviation community. The principles are aligned to the Hampton Principles[11] and the Regulators' code[12] as the UK Government's regulation benchmark.

2. **Principle 1: Risk-Based Assurance.** The MAA undertakes independent, Risk-based[13] Assurance of organizations (people and processes) and output (product and activity) via a programme that is proportional to an organization's size, complexity and outputs.

a. MAA Assurance is Risk-based and derived from a comprehensive assessment of regulated organizations, their outputs, and the associated Air Safety or Environmental Risk.

b. The frequency and depth of MAA Assurance visits are driven by the level of Air Safety or Environmental Risk, which is, in turn determined through assessment of evidence, or lack of it.

c. MAA Assurance is based on operating and technical organizational approvals, certification of designs, endorsement of Suitably Qualified and Experienced Persons (SQEP) in specified appointments, and assessment of Air Safety and aviation related Environmental Protection activities.

d. Assurance assesses compliance with the MRP to identify the effectiveness of systems / processes in managing Air Safety and aviation related Environmental Protection.

e. MAA Assurance is programmed to assure a whole organization and its Air Safety and aviation related Environmental Protection related outputs.

3. **Principle 2: Minimal Regulatory Burden.** MAA Assurance activity is minimized to that required to assure Air Safety and aviation related Environmental Protection across the Defence Aviation community, in order to reduce the regulatory burden on the Defence Aviation community.

a. ►◄

b. Where possible, MAA Assurance visits are combined and co-ordinated with other internal Assurance processes and supporting activities conducted by trusted agents.

c. In addition to the core programme, targeted MAA Assurance of organizations and their outputs is based primarily on indicators such as trend analysis, Occurrence reports, Safety or Environmental issues / Incidents or when requested.

d. Regulated organizations will not be required to provide unnecessary information to the MAA or the same piece of information twice.

4. **Principle 3: Independence.** The MAA undertakes 3rd Party Assurance[1] of Defence Air Safety and organizations and their outputs as part of layered Assurance.

a. MAA Assurance activity will focus, in the first instance, on the performance of those bodies (where present) conducting 2nd Party Assurance[1] on regulated organizations.

[11] The Hampton Review Report published in Mar 05 (Reducing Administrative Burdens: Effective Inspection and Enforcement) was produced for the Chancellor. Its recommendations, including a set of regulatory system principles, promoted for use by UK Government regulatory bodies by the National Audit Office (NAO) and Better Regulation Executive (BRE). Regulators are assessed and progress benchmarked against the Hampton Report by the NAO.
[12] https://www.gov.uk/government/publications/regulators-code.
[13] From the Hampton Principles and BRE guidance, risk-based regulatory assurance focuses around the risk of the activity being undertaken and the consequences of regulatory non-compliance.

b. Where it is available, robust and effective 1st and 2nd Party Assurance[1] evidence will be exploited by the MAA, reducing the need for independent MAA Assurance of those activities.

c. As an independent 3rd Party regulator, the MAA may visit any level of an organization to gather evidence if the Risk / lack of Assurance evidence warrants, or for validation purposes.

5. **Principle 4: Proportionate Sanctions Regime.** The MAA has a clear, proportionate and effective sanctions regime that takes into account operational requirements.

a. The MAA's sanctions regime, and associated Enforcement policy, is clearly defined and published in this Chapter.

b. The sanctions regime covers all areas of Defence Aviation and is implemented in an open and co-operative manner.

c. Sanctions are proportionate to the nature of non-compliance, aiming for successful resolution, improved behaviours, and to prevent future recurrence.

d. MAA sanctions are applied in a timely manner, in order to achieve an effective outcome.

e. The sanctions regime is subject to review and amendment to ensure it remains appropriate and effective.

6. **Principle 5: Optimization.** The MAA advises and assists the Defence Aviation community to improve Defence Air Safety and Environmental Protection systems and maintain regulatory compliance.

a. In order to improve Defence Air Safety, aviation related Environmental Protection and enhance the delivery of operational capability, the MAA identifies good practice, issues of non-compliance and those areas that would benefit from improvement.

b. MAA Assurance teams provide constructive regulatory advice and guidance promoting a proactive and engaged Air Safety and environmentally aware culture across the Defence Aviation community.

7. **Principle 6: Feedback.** The MAA continuously improves Assurance activities by drawing on feedback from the Regulated Community (RC), as well as from internal MOD and external Assurance good practice. Whilst the MAA will actively seek out information and advice through appropriate consultation, it will retain its independence by reserving the right to decide on regulatory issues.

a. There is a process for the RC to provide feedback on MAA Assurance activity.

b. The MOC is the high-level stakeholder forum for discussion of the MAA Assurance programme, its findings and consequent issues. The MOC also provides a forum through which high level lessons and good practice can be spread across the aviation community. The ►IEC◄ as the industry equivalent of the MOC also provides stakeholder input.

Second Party Assurance

8. In-line with Principles 1, 2, 3 and 6 above, the MAA seeks to maximize the benefit of the 2nd Party Assurance that is provided by the RC. 2nd Party Assurance is conducted by, or on behalf of, an organization that has an interest in the business[14]. In the MAA's view, 2nd party providers include but are not limited to: Air Safety Cells that support the ODH; each Front Line Command (FLC) flying standards and 'external Quality Audit' organizations; standards evaluation (STANEVAL) organizations that exist in the Defence Aviation community; and the Safety and environmental management teams that support the air domain Operating Centre Directors in Defence Equipment and Support (DE&S). As a 3rd Party Assurance organization supporting the SofS, the MAA has a responsibility for assessing whether the oversight provided by the 2nd parties

[14] Refer to ISO 19011 – Guidelines for Auditing Management Systems.

is accurate, timely and effective. The MAA assesses the credibility of 2nd parties; a 2nd party should:

a. Define explicitly the standards against which it provides Assurance[15].

b. Define the scope of the organizations that it assures.

c. Operate a comprehensive and documented Assurance programme that is Risk-based.

d. Define the competence required of its auditors and ensure they are suitably qualified and experienced.

e. Have an Enforcement regime and be able to demonstrate its effectiveness when non-compliance is discovered.

f. Routinely share Assurance / oversight findings with the MAA.

Applicability of Regulations

9. Unless specifically excluded, the MRP applies to the following activities:

a. Flying operations conducted by all personnel (be they civilian or military) operating or flying in an Air System which falls under the regulatory scope of the MAA.

b. Military ATM, including but not limited to civil licensed controllers who provide Air Traffic Control (ATC) services at government Aerodromes or ranges, airfield standards and procedures, ATC equipment, and air ranges.

c. Continuing Airworthiness engineering and Maintenance aspects associated with Air Systems on the UK MAR.

d. Type Airworthiness engineering aspects associated with Air Systems active on, or destined to be active on the UK MAR.

e. Other systems, personnel and activities that may have an impact on Air Safety and aviation related Environmental Protection, such systems include, but are not limited to: airspace management, mission planning / navigation aids, simulators, Aerodromes, embarked aviation facilities and Air Launched Weapons.

10. **Air System Registration[16]**. The OAG issues the registrations of UK military Air Systems and maintains the UK MAR of all military Air Systems on behalf of the SofS. To meet international obligations the MAA has procedures for registration, including the requirement to issue various Certificates of Registration and De-registration; these certificates provide the auditable record of Air Systems being placed on, and de-registered from, the UK MAR.

Flying Operations in the Defence Air Environment

11. The RA 1160 Series ►details the◄ DAE Operating Framework. Air Systems that qualify for military registration may be Military or Civilian-Owned and Flying Operations within the DAE will fall into one of the following operating categories:

a. **Military or Civilian Operated (In-Service)**. Activity related to a UK military registered Air System being operated in the interest of the MOD to deliver the intended capability, be that training or operations.

b. **Military or Civilian Operated (Development)**. Activity related to a UK military registered Air System where the capability is being tested, evaluated or assessed ►◄.

c. **Special Case Flying**. ►All UK military registered Air systems operated which are not being operated in the interest of the MOD, but the activity is deemed in the interest of the wider UK Government.◄

[15] As a minimum, the expectation is that standards (including policy and orders) are MRP compliant.
[16] Remotely Piloted Air Systems operating in the Open Category and Specific S1 sub-category are to be registered on the UK MAR by type.

12. ►ADHs, and Sponsors of Civilian-Owned Air Systems or Civilian Operated Air Systems, assign the DAE Operating Category to the Air Systems within their Area of Responsibility (AoR).◄ The Air System is then subject to the governance arrangements defined by that operating category. The MAA can be contacted to provide bespoke clarifying guidance, if required.

13. The flight release and limitations document for Military Operated (In-Service) Air Systems is the Release To Service. For all other DAE Operating Categories, the Military Permit To Fly is applicable using the (Development), (In-Service), (Special Case Flying) or (Single Task) format.

Collaborative Projects

14. Variations in Defence Aviation procedures and standards must be clearly documented. A UK Air System Delivery Team making use of the processes or outputs (eg Certification evidence or Organizational Approvals) from foreign Aviation Authorities, in a collaborative project, must ensure that:

a. They consult with the MAA early in the process in order to ensure that appropriate requirements for Air Safety and Environmental Protection, including any applicability to the MRP, are contained in the applicable contractual arrangements or inter-government Memorandum of Understanding.

b. Any intended use of the outputs from a foreign Aviation Authority are submitted via an Alternative Acceptable Means of Compliance (AAMC)[17] in a clear format with further details submitted if appropriate[18].

c. Any flight test programme shared between contractors and designated official test centres in the collaborating nations is conducted to a level of Air Safety that has been agreed with the MAA and includes any relevant aviation related Environmental Protection requirements.

MAA Enforcement Policy

Principles

15. The DSA has issued direction for Defence Regulators to adopt a common Enforcement model. This was issued ►DSA01.3 Enforcement◄ and is shown at Figure 2-1. This is consistent with MAA principles:

a. **Principle 1: Enforcement action may be taken in the event of regulatory non-compliance / conformance.**

(1) The MAA will provide guidance and information on regulatory compliance matters; it will encourage early engagement with the Regulator and compliance with the MRP.

(2) Where necessary, the MAA's Enforcement policy, supported by appropriate Enforcement Action, will aim to secure regulatory compliance.

b. **Principle 2: Enforcement Action shall be fair and proportionate.**

(1) Full details of the nature of non-compliance[19] will be given.

(2) The response to a non-compliance will be proportionate.

(3) There is an appeal process (in MAA03) to ensure that individuals and organizations are able to challenge decisions iaw the principles of natural justice.

(4) The Enforcement policy will be reviewed periodically.

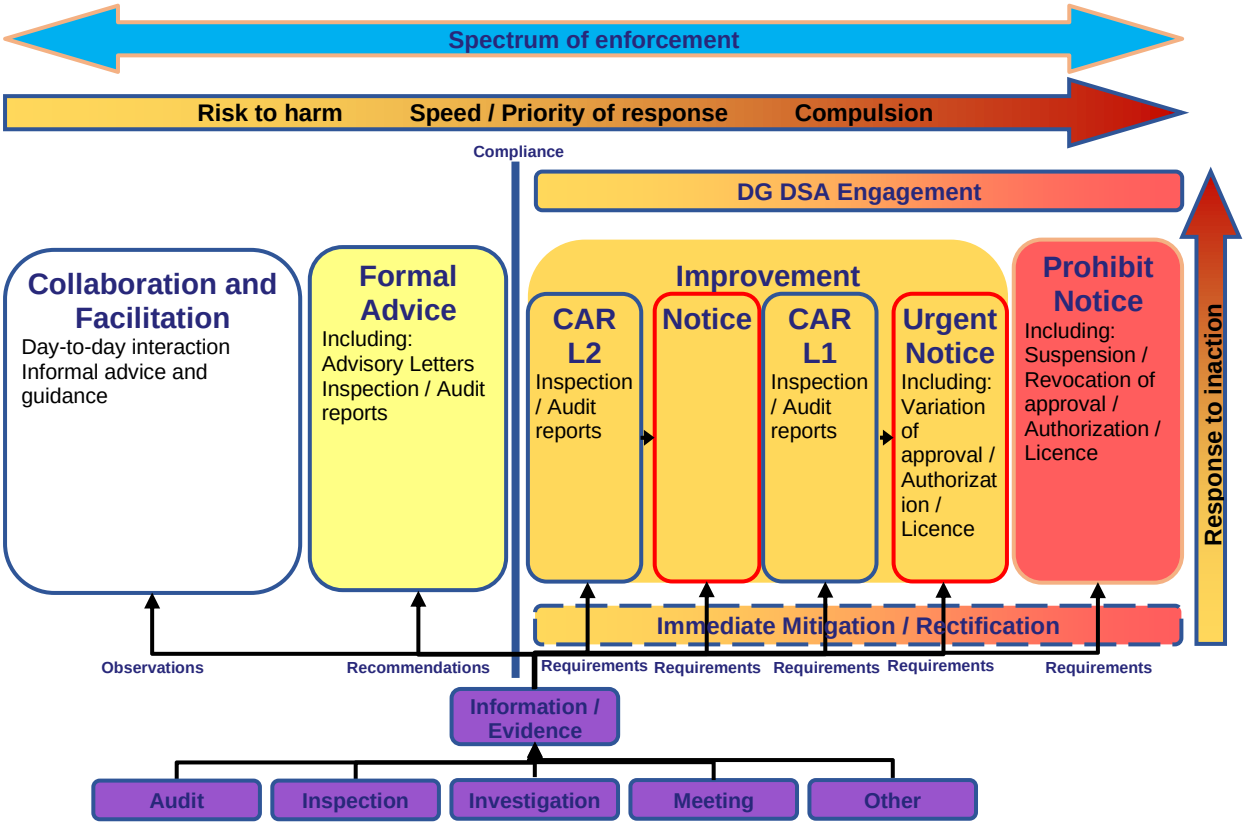
(5) Enforcement Action will relate directly to the non-compliance and associated Risks.

[17] Refer to MAA03: MAA Regulatory Processes.
[18] Refer to RA 1005 – Contracting with Competent Organizations and RA 5810 – Military Type Certificate (MRP 21 Subpart B).
[19] There may be non-compliance (with the MRP) or non-conformance with local processes.

(6) A programme to verify compliance will be initiated following Enforcement Action.

(7) Details of Enforcement Action may be disclosed to relevant stakeholders and, where appropriate, the wider public[20].

Figure 2-1: The Enforcement Spectrum



16. These principles are consistent with the engaged safety culture that underpins Continuous Improvement in Air Safety, as defined in the Manual of Air Safety[21].

Audit Findings and Action Plans

17. Following an Audit or inspection, the first course of action following identification of a non-compliance / conformance, raised via a Corrective Action Requirement (CAR), will be a written Corrective Action Plan (CAP) produced and owned by the appropriate person / organization, and agreed by the MAA which sets out the actions to be taken. This process provides the organization with the opportunity to work with the MAA to formulate targets to ensure compliance. The actions contained in the CAP will be proportionate and bear a direct relationship with the underlying non-compliance / conformance. A reasonable time period within which to demonstrate compliance shall be defined in the CAP. CARs can only be closed by the MAA based on evidence provided by the subject on whom the CAR was placed that:

a. Investigation of the non-compliance / conformance has been of sufficient rigour to reveal the root cause.

b. A CAP has been devised which addresses the root causes and does not merely treat the symptoms.

c. The delivery of the CAP would resolve the non-compliance in a sustainable manner.

[20] Subject to the provisions of the Data Protection Act 1998 and the Freedom of Information Act 2000. Where appropriate, consideration will also be given to commercial sensitivities of organizations.
[21] Refer to Manual of Air Safety – Chapter 3: Air Safety Culture.

d. There has been sufficient evidence of progress to give confidence that the CAP will be delivered within a reasonable timescale.

e. Any associated RtL arising from the non-compliance / conformance has been communicated to affected ADH / AM(MF) and are mitigated so that they are ALARP and Tolerable.

Enforcement Notices

18. There are 3 types of Enforcement Notices:

a. **Improvement Notice (IN)**. An IN is served on an accountable person where the Regulator has identified a non-compliance with Defence Regulations and / or the response to CARs is unsatisfactory. The recipient of the IN is required to demonstrate to the MAA that the required improvements have been made before the IN is lifted.

b. **Urgent Improvement Notice**. An Urgent IN would be appropriate if the level of Risk associated with the non-compliance is considered high and requires urgent corrective action to be taken.

c. **Prohibit Notice (PN)**[22]. A PN is served on the accountable person where the Regulator feels that the Risk associated with the activity is neither ALARP nor Tolerable. A PN does not have to be attributed to non-compliance with Defence Regulations; the trigger is the Regulator's perception of the Risk of harm. The PN requires the activity to cease while the corrective action is completed. The recipient of the PN is required to demonstrate to the MAA that the Risk has been reduced before the PN is lifted and the activity can commence.

Operational Imperative

19. Where the ADH cannot comply with the RAs ►◄, it may not be appropriate for the activity to cease immediately if there is an operational imperative.

a. An Operational Commander may decide to continue with operational activity where it is judged that the operational benefits gained from a specific operational activity outweigh the high residual Risk that has been mitigated to ALARP. In arriving at such a decision, where time and security constraints permit, the assessment of the Risk, its mitigation and justification of the benefits should be made with the appropriate ADH and discussion with the MAA.

b. It might be appropriate for an ADH, when preparing force elements for a specific operation, to make a judgement in discussion with the MAA and future Operational Commander to ascertain that the output of the force preparation activity is essential to the operational capability required for that specific operation. Alternative means of delivering that operational capability should also be considered.

Additional Enforcement Action pertaining to Crown Servants only

20. Additional administrative and disciplinary actions (for Service Personnel) and disciplinary sanctions (for Civil Servants) exist where persons employed under Crown Rules / Regulations have either demonstrated professional failings or committed offences. Whilst this action will be taken by the chain of command, it is envisaged that the MAA may, in appropriate circumstances, provide the evidence to support such action.

21. All accountable persons who are Crown Servants are to ensure that the MRP are enforceable against their Crown Servant staff engaged in Defence Aviation activities. It is envisaged that this will be achieved by promulgation of appropriately worded standing orders.

Enforcement Action against External Organizations

22. It is acknowledged that it will not always be in the Service interest to impose a sanction which has the effect of terminating a commercial agreement; however, this remains a real and credible

[22] For further detail, refer to Chapter 3 paragraph 4b(3).

course of action in the event of serious and / or continuing non-compliance. If the MAA is considering varying, suspending or revoking an approval, the MOD 'customer' will be consulted to inform understanding of the potential impact on operational output(s).

Publication of Reports and Enforcement Action

23. As part of an open and transparent Enforcement policy, extracts of inspection reports, Audits and Enforcement Action may be published (noting that redaction may be appropriate in some circumstances).

Appeals

24. If the accountable person to whom the Enforcement Action is attributed wishes to appeal to the MAA, this should be done iaw MAA03 Annex E[23]. In the first instance, informal engagement may resolve any disagreement; this may be achieved prior to the Enforcement Action actually being served. If resolution cannot be found, there is a formal 2-stage process escalating through the MAA to the DG DSA.

25. In the case of an appeal against a PN, the requirement to cease activity remains extant while the appeal is being considered.

26. The MAA is committed to the following code when handling appeals:

a. The MAA shall accept appeals in writing, by email or letter.

b. The MAA shall treat all appeals seriously.

c. The MAA shall treat appellants fairly and courteously.

d. The MAA shall deal with appeals promptly.

[23] Refer to MAA03 Annex E: MAA Appeals.

Chapter 3 The Management of Air Safety

Air Safety Functions

1. Three distinct Air Safety functions exist; Regulation, Operation and Assurance. The constructive interaction of these functions maximises system integrity.

►Regulation◄

2. ►◄ Regulation is a central part of the regulatory framework that governs the Defence Aviation community; it is defined in MAA01 Chapter 4, paragraphs 14 to 16 and in MAA02. The Regulator develops Regulations in response to applicable UK law, MOD needs, legal challenges, and recommendations resulting from the Assurance or investigation functions.

►Operation◄

3. ►◄ The MOD, and Defence Contractor Flying Organizations, operate Air Systems iaw the MRP. Operators can modify and test systems iaw the MRP and applicable certificates.

Assurance

4. The Assurance function is a vital part of good regulatory activity and must be independent of the operating functions. MAA Assurance activity examines compliance with the MRP and effectiveness of an organization's ASMS, including the organization's internal Assurance arrangements. MAA Assurance activities are undertaken in a manner proportionate to the Risk and include but may not be limited to:

a. **Product Certification.** Certification leads to the MAA issuing a Military Type Certificate (MTC) or Approved Design Change Certificate for a new Air System type or Major Change to Type Design[24].

b. **Organization Approvals.** Where there exists a group of organizations in the Defence Aviation community which perform essentially the same function and are bound, therefore, by a common block of Regulations, the MAA may operate an Approval Scheme in order to promote standardization and best practice among the group.

(1) If appropriate the MAA may seek to minimize the differences in its Approval Scheme with the civil equivalent (eg MAOS with European Aviation Safety Agency Part 145) in order to reduce the regulatory burden on organizations that serve multiple customers.

(2) It should be noted that Approvals issued by the CAA and foreign Air Safety regulators, Civil or Military, are not accepted automatically by the MAA; organizations in the Defence Aviation community that wish to make use of such an Approval must submit an application for AAMC iaw MAA03.

(3) Approvals can be suspended or revoked (or made dormant when a contract expires with no fault by the organization), and that such action would prevent the approved activity taking place iaw the MRP and therefore have the same outcome as a PN.

c. **Endorse Individuals.** Key personnel are required to hold MAA endorsements to undertake specific tasks as stipulated in the MRP. ADH, AM(MF), TAA and TAM are subject to MAA endorsement, set against SQEP criteria.

5. The MAA maintains oversight of the Defence Aviation community through a Risk-based programme of Assurance activities[25]. Audits are a systematic, independent and documented process for obtaining and evaluating evidence objectively to understand the extent to which criteria are fulfilled.

[24] Although the MAA no longer issue Statements of Type Design Assurance, some continue to exist.
[25] Assurance activities include: Audits, CAR closure visits, meeting attendance, Aircraft Product Samples, and informal surveillance.

6. The Recognition process provides a structured evidence base to support a judgement on the extent to which another National Military Aviation Authorities's (NMAA) technical Airworthiness outputs would be acceptable for use within the MAA Certification or Organization Approvals processes.

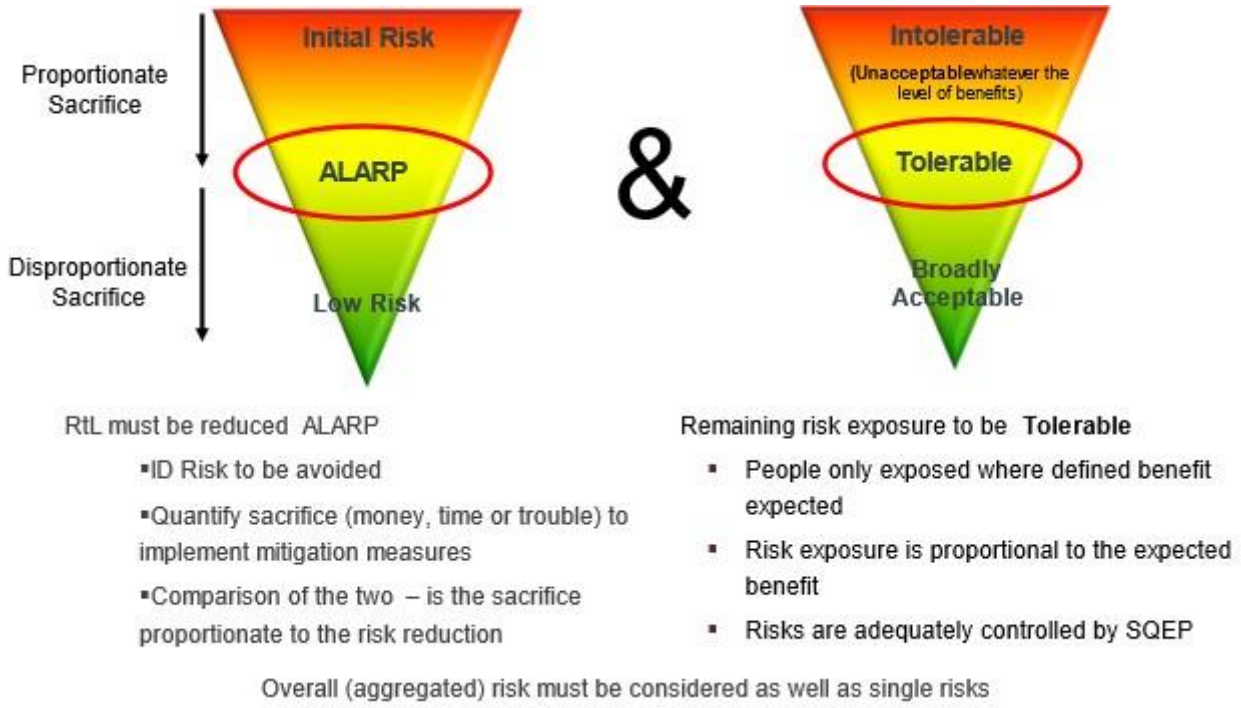
7. Further information on Recognition can be found in the MAA Manual of Military Airworthiness Recognition[26] and on the MAA website[27].

8. Recognition of another NMAA also adds value beyond claiming credit for Certification activities or the use of Organization Approvals; it builds a relationship of trust and respect which could lead to closer cooperation between the MAA and other NMAAs on matters not related to Recognition.

Key Responsibilities

9. Responsibility for Air Safety is divided amongst the Defence Aviation community, however, there are some explicit responsibilities assigned to individuals. These key responsibilities are defined such that there is clear accountability for the Safety decisions made. Ultimately, it is the ADH or AM(MF) who has the responsibility to ensure that any RtL associated with an activity is ALARP and the exposure Tolerable[28].

Figure 3-1: ALARP and Tolerable



Aviation Duty Holder (ADH)

10. In common with any other command appointment, ADHs have a personal Duty of Care to the personnel under their command. This Duty of Care owned by ADHs also extends to those who, by virtue of their temporary involvement in specific aviation activities, come within an ADH's AoR and the wider public who may be affected by their operations. In addition, ADHs are specifically made aware of their legal accountability to provide for the safe operation of Air Systems[29] and the development and management of ASSC(s) supported by an effective ASMS within their AoR.

[26] Refer to Manual of Military Airworthiness Recognition (MMAR) – https://www.gov.uk/government/publications/manual-of-military-airworthiness-recognition-mmar.
[27] MAA Recognition – https://www.gov.uk/government/publications/maa-recognition.
[28] Refer to RA 1210 – Ownership and Management of Operating Risk (Risk to Life) Annex B – ALARP and Tolerable.
[29] Refer to RA 1020 – Aviation Duty Holder ►◄– Roles and Responsibilities.

11. The application of coherent Risk management processes is fundamental to achieving an effective ASMS. The MAA mandates the use of a Risk Register or suitable alternative[30], Hazard Risk Matrix, and referral / escalation protocol to assist ADHs in developing and managing their ASMS in a consistent manner, to enable Risks to be compared, ranked and mitigation resources targeted accordingly. The requisite principles for management of RtL are detailed in the MRP.

Accountable Manager (Military Flying) (AM(MF))

12. AM(MF)s have a personal Duty of Care to the personnel within their AoR. This Duty of Care owned by AM(MF)s also extends to those who, by virtue of their temporary involvement in specific aviation activities, come within an AM(MF)'s AoR and the wider public who may be affected by their operations. In addition, AM(MF)s are specifically made aware of their legal accountability to provide for the safe operation of Air Systems[29] and the development and management of ASSC(s) supported by an effective ASMS within their AoR and within the terms of their (CFAOS) approval.

13. The application of coherent Risk management processes is fundamental to achieving an effective ASMS. The MAA mandates the use of a Risk Register or suitable alternative[30] and Hazard Risk Matrix in developing and managing their ASMS in a consistent manner, to enable Risks to be compared, ranked and mitigation resources targeted accordingly. The requisite principles for management of RtL are detailed in the MRP.

►◄

14. ►◄

a. ►◄

b. ►◄

c. ►◄

15. ►◄

Military Type Certificate Holders (MTCH)

16. In order to ensure that an Air System's design meets appropriate safety requirements, a systematic, independent Certification process[31] has been introduced by the MAA; this process leads to the issue of a MTC to a MTCH. Only a TAA / TAM can be a MTCH.

Type Airworthiness

17. The TAA is the Crown Servant responsible for exercising the Type Airworthiness of an Air System throughout its full life cycle (excluding Special Case Flying Air Systems).

18. A TAM is a named individual within a DAOS approved organization responsible for exercising the Type Airworthiness of an Air System in line with the Sponsor's approved model for Type Airworthiness[32, 33].

19. The TAA or TAM will be the MTCH for Air Systems that have been awarded a MTC by the MAA.

Sponsor

20. The Sponsor is responsible for the authorization of the MPTF (In-Service)[34] for a Civilian Operated (In-Service) Air System. They are also responsible for ensuring the Assurance of Air Safety governance arrangements for Civilian Operated Air Systems[35, 32, 33].

[30] Any suitable alternative should enable a record to be kept of Risk decisions, activities and periodic Risk reviews.
[31] Refer to RA 5810 – Military Type Certificate (MRP 21 Subpart B).
[32] Refer to RA 1162 – Air Safety Governance Arrangements for Civilian Operated (Development) and (In-Service) Air Systems.
[33] Refer to RA 1163 – Air Safety Governance Arrangements for Special Case Flying Air Systems.
[34] Refer to RA 1305 – Military Permit to Fly (In-Service), (Special Case Flying) and (Single Task).
[35] Refer to RA 1019 – Sponsor of Military Registered Civilian-Owned and Civilian Operated Air Systems - Air Safety Responsibilities.

Release To Service Authority (RTSA)

21. The RTSA is responsible to their respective SDH for the authorization and issue of the RTS for an Air System type with due attention to continual assuring of the validity of the RTS. Where operational imperatives may result in higher levels of Risk exposure or where supporting evidence is still immature, the RTSA may consider clearances such as Operational Emergency Clearances and Clearances with Limited Evidence and advise ADHs as appropriate.

Individual Responsibility

22. All individuals within the Defence Aviation community have a duty to notify the MAA of any event that may jeopardize Air Safety and which is not being addressed appropriately by the responsible command or management chain[36].

Regulated Community (RC)

23. The RC needs to ensure that it is working to extant Regulations through their own internal Safety Management System (SMS), Quality Management Systems, other internal Assurance arrangements, and by making regular reference to the published MRP (see MAA website[37]).

Definitions

24. **Air Safety.** Air Safety is the state of freedom from unacceptable Risk of injury to persons, or damage, throughout the life cycle of military Air Systems. Its purview extends across all Defence Lines of Development and includes Airworthiness, Flight Safety, Policy, Regulation and the apportionment of Resources. It does not address survivability in a hostile environment.

25. **Airworthiness**. Airworthiness is the ability of an Air System or other Airborne Equipment or system to be operated in flight and on the ground without significant Hazard to Aircrew, ground crew, Passengers or to third parties; it is a technical attribute of materiel throughout its lifecycle.

26. **Flight Safety**. Flight Safety describes a collective endeavour to operate in the air environment safely and embraces any activity that contributes to the safe operation of military airworthy Air Systems in flight or on the ground.

27. **Regulated Entity (RE)**. An RE is an individual / organization that is required to comply with the MRP.

[36] Refer to RA 1410 – Occurrence Reporting and Management, which describes both Defence Air Safety Occurrence Reports (DASORs) and the Defence Confidential Occurrence Report Scheme (DCORS).
[37] https://www.gov.uk/government/organisations/military-aviation-authority.

Chapter 4 MAA Regulatory Publications

Introduction

1. D MAA is the owner of the MRP and exercises authority to issue it for DG DSA on behalf of the SofS. The MRP common format improves clarity by separation of Regulation from Guidance. A key benefit is the removal of overlap, conflict and duplication of regulatory material. The MRP is simultaneously available on the MOD intranet and internet for the widest possible access by the RC.

2. The Regulatory Articles (RAs) within the MRP are Orders within the meaning of the Armed Forces Act. The MRP has primacy over all other Defence Aviation orders or instructions, except when superseded by a Regulatory Instruction or a DIN issued by the Defence Council.

3. The MAA regulates Defence Aviation by issuing the MRP which aim to:

   a. Reflect state of the art and global good practice in the field of air operations.

   b. Take into account worldwide Air System experience in service, scientific and technical progress.

   c. Be Risk-based and proportionate.

Responsibilities

4. The MRP does not absolve any person from using their best judgement to ensure the Safety of Air Systems, personnel and the protection of the environment, nor do they preclude an individual from fulfilling any legal obligations that may be placed upon them in relation to the legal Duty of Care owed or statutory HS&EP requirements. Where safety, Environmental Protection or operational imperatives demand, the MRP may be deviated from provided that a convincing case can be offered in retrospect. Where authorized individuals issue their own amplifying orders or instructions, they must be iaw the MRP and must not be more permissive.

Applicability

5. The MRP is equally applicable to both the MOD and contractors. The MRP shall be applied through contract to those commercial organizations designing, producing, maintaining, handling or operating Air Systems and associated equipment, including ATM, in the Defence Aviation community. Compliance with the MRP will not in itself relieve any person from any legal obligations imposed upon them. The MRP have been devised solely for the use of the UK MOD, its contractors in the execution of contracts for the MOD and those organizations that have requested to operate their Air Systems active on the UK MAR. To the extent permitted by law, the MOD hereby excludes all liability whatsoever and howsoever arising for any loss or damage however caused when the MRP are used for any other purpose. Contracts and contractual amendments should ensure that the requirement to comply with the extant MRP is captured at date of contract let or amendment[38]. The MAA will continue to monitor this situation through Assurance activity.

Alternative to MRP Compliance

6. Where an RE cannot comply with any part of the MRP, either by Acceptable Means of Compliance (AMC) or AAMC, and the criteria for the MAA to grant a Waiver or Exemption cannot be met, the RE can seek agreement from the SofS to follow an alternative course of action. This is subject to the Risks associated with this course of action being identified, mitigated and held at the appropriate level and only where SofS is assured that the requisite levels of Air Safety and Environmental Protection are maintained.

7. The MAA may request evidence that the conditions stipulated in approved AAMCs, Waivers, and Exemptions are being complied with as part of the ongoing Assurance arrangements for Defence.

[38] Refer to RA 1005 – Contracting with Competent Organizations.

MAA Regulatory Publications Structure

8. This document provides D MAA's overarching policy. This policy is enabled and regulated through the MRP, focused to a specific topic. Each RA, within the MRP, contains Rationale, Regulation, AMC and Guidance Material (GM) and may be supported by additional documents where appropriate.

9. In addition to MAA01, there are 2 further top-level documents:

   a. **MAA02: MAA Master Glossary**. The authoritative master glossary for all terms with a specific meaning used within the MRP. It is not the definitive Defence Taxonomy for aviation; rules for insertion of definitions are contained in the preface.

   b. **MAA03: MAA Regulatory Processes**. The processes that enable interaction between REs and the MAA, including (but not limited to) the MRP amendment, Waiver and Exemption processes and the process for submission / ratification of AAMC.

10. The MRP is broken down into 5 distinct series of RAs, Policy documents, Manuals, and Supporting documents as outlined below and in Figure 4-1:

   a. 1000 Series: General Regulations (GEN).

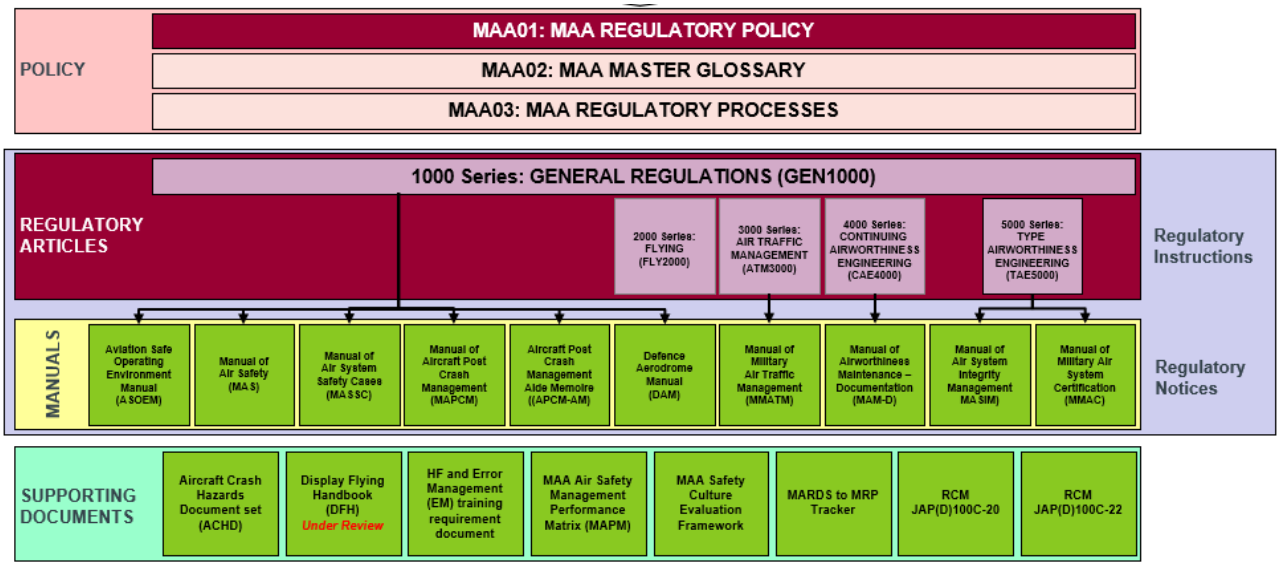
   b. 2000 Series: Flying Regulations (FLY)[39].

   c. 3000 Series: Air Traffic Management Regulations (ATM).

   d. 4000 Series: Continuing Airworthiness Engineering Regulations (CAE).

   e. 5000 Series: Type Airworthiness Engineering Regulations (TAE).

Figure 4-1: MRP Structure



11. The contents of each series are published on the MAA website.

12. Where required ADHs, AM(MF)s, Accountable Managers, Operational Commanders and those with delegated authority for Air Safety may issue lower-level orders or instructions appropriate to the individual operating scenarios and Air System types, with the aim of ensuring compliance with regulatory requirements.

[39] The 2000 Series RAs are applicable to all Aircraft except Remotely Piloted Air Systems (RPAS) operating in the Open Category and S1 sub-category.

Regulatory Articles

Rationale

13. Rationale provides the origin / reason for the subsequent text in the specific RA. It is always at the start of the RA and applies to the whole of that article. The rationale is written in such a way that it enables users of the RA to understand why a particular Regulation has been created. The rationale will explain:

a. The Context (what is happening and why is regulation required).

b. The Hazard (what are the Hazards associated with the activity).

c. The Defence (what defence is the regulation aiming to provide).

Contents and specific definitions

14. A table of Regulation contents and, if appropriate, specific definitions follows the rationale.

Regulation

15. Regulation is defined as a “prescribed rule or authoritative direction”. Within the context of the MRP, the Regulations are defined as overarching mandatory activities which have to be followed without exception (unless a Waiver / Exemption has been formally issued). They will contain the executive verb **shall** (highlighted in bold for visual impact) and this is the only place where this particular executive verb will be used.

16. Where a Regulation states that a person **“shall”** do something, the RE has no choice but to do it. Whenever possible, Regulations will be written in the positive sense. If this is not feasible then where the provision states that a person **“shall not”** do something, the RE is prohibited from doing a certain act.

17. The MAA, as the Regulatory body, must be notified if an RE considers that they cannot comply with a Regulation.

Acceptable Means of Compliance (AMC)

18. AMC illustrate a means, but not the only means, by which Regulations can be met and the RE may decide to show compliance by other means. AMC are written in the permissive sense in order to allow an RE the opportunity to consider alternative approaches. As a consequence, AMC contain the permissive verb **should** (highlighted in bold for visual impact). This is the only place where this particular permissive verb is to be used.

19. Where the RE believes there is a more effective way of satisfying the intent of the Regulation, it may utilize the AAMC process outlined in MAA03 to apply to the MAA for approval. However, AMC are the expected means of compliance with the Regulations; regardless of whether published AMC are used, or alternatives are proposed to the Regulator, the burden of proof that the Regulation is satisfied rests entirely with the RE.

20. The RE should consult the Regulator as necessary to ensure that AMC are valid for local operating conditions.

Guidance Material (GM)

21. GM is typically developed to accompany AMC in order to provide additional explanation to help illustrate and assist the application of the Regulation. In seeking to assure compliance with the Regulations the Regulator may refer to GM as illustrating good practice.

22. In GM, the word “must” is used for citing legislative or regulatory requirements (eg HSWA 1974 or other MRP RAs) and has to be complied with.

Manuals

23. Manuals have the same regulatory standing as GM, unless they are referred to in an RA’s AMC at which point the Manual has the same regulatory standing as AMC, but may differ in style and / or wording.

Waivers and Exemptions

24. Waivers, for a specified period, or permanent Exemptions from extant Regulations may be employed at the request of an RE and when agreed by the Regulator (the signatory level will be dependent upon type, complexity or whether the request is novel and / or contentious). The process outlined in MAA03 is to be used. Notwithstanding that Exemptions are permanent, they will be periodically reviewed by the MAA.

Amendments

25. Sponsorship of the MRP and the authorization of amendments are the responsibility of D MAA. The extant MRP may be subject to amendment following routine or post-implementation review or as a result of: policy change; capturing good practice; AAMCs; Waivers; Exemptions; the need for new Regulation; the withdrawal of obsolete Regulation or SI recommendations. Equally, the RC can submit a Request For Change (RFC) where an error or omission has been identified, or to change or improve the wording of the MRP.

26. MRP amendments will be published on the MAA website. Organizations are responsible for cascading MRP amendments internally in an effective way.

27. The MAA gov.uk website offers a notification function[40], which the RC can sign-up to, however this does not absolve individuals from checking they have the latest version of the MRP.

Regulatory Instructions and Regulatory Notices

28. To effect timely communication of regulatory changes, the MAA will employ Regulatory Instructions or Regulatory Notices, dependent upon the nature of the information conveyed:

a. **Regulatory Instruction (RI)**. RIs will be issued by the MAA to provide direction, and have the same authority as MAA Regulation. Typical usage will include the promulgation of new or amended Regulation at short notice, or to provide authority for deferred compliance with new or amended Regulation. Amendment proposals relating to the content of RIs should be made via the RFC process and reference the 'parent' MRP document.

b. **Regulatory Notice (RN)**. RNs will be issued by the MAA to notify the RC of changes in MAA owned process, or provide operational or engineering guidance. They may promulgate planned MAA activity and are administrative in nature. RNs do not constitute Regulatory requirements. Comments regarding the content of an RN should be directed to DSA-MAA-MRPEnquiries@mod.gov.uk.

29. RIs and RNs will be approved at the appropriate level within the MAA dependent upon type, complexity or whether it is novel and / or contentious. They will be published on the MAA website. Organizations are responsible for cascading RIs and RNs internally in an effective way. The RI and RN process will exist in addition to the routine document amendment service but will only be used where more timely notification is required. When appropriate, RIs and RNs will be incorporated into the MRP.

30. The MAA gov.uk website offers a notification function, which the RC can sign-up to, however this does not absolve individuals from checking they have the latest RIs and RNs.

RFC Process

31. Proposals for amendments to all MRP content can be made using the RFC form iaw the process detailed in MAA03. It should be noted that for amendments to the Manual of Airworthiness Maintenance – Documentation (MAM-D) and MOD Form 700 series forms, a MOD Form 765 is to be used.

Changes to the MRP

32. **Consultation**. The RC will be consulted on particular regulatory amendments, through the MAA issuing a Notice of Proposed Amendment (NPA) on the MAA website. The NPA will explain

[40] https://www.gov.uk/email-signup?link=/government/organisations/military-aviation-authority.

the rationale behind the amendment, the possible impact on the RC and set the deadline for comment / feedback; feedback is crucial to further develop the Regulation. If an NPA results in a significant change, a further period of consultation will be considered prior to the amendment being issued via a Notice of Authorized Amendment (NAA).

33. **Publication**. Once staffing of a proposed amendment is complete, there may be a decision to implement a change. To inform the RC of changes in the MRP, an NAA will be issued on the MAA website detailing which part of the MRP has been amended. To ensure the full context of the amendment, the NAA will include an overview of the amendment. Internally, the MAA will maintain records of the justification supporting any MRP amendment and the associated NAA authorizing signatory. The RC needs to be aware that when an NAA is issued, the MRP Amendment Record Sheet is updated. This document provides the date of publication and issue status for all MRP documents.

34. **Periodicity**. Changes to the MRP will be published iaw the MRP Publication Cycle[41]. Where the routine amendment process for the MRP is not sufficiently agile to effect timely communication of urgent regulatory changes, RIs may be employed.

[41] Refer to MAA03: MAA Regulatory Processes, Annex A: MAA Regulatory Publication Amendment.

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