

**NPA/24/26**

**Title of Proposal:** RA 1910 – Quality Assurance of aviation fuel from non-UK MOD Sources

**RA(s) or Manual Chapter(s):** Whole Document

**Organizations and / or business sectors affected:** Whole Regulated Community

**RFC Serial No:** MAA/RFC/2023/169

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N/A	N/A	N/A	N/A

**Cross-references to Other Documents or Relevant Sources**

**Other MRP Amendments:** N/A

**Service Inquiry Recommendations:** N/A

**AAIB Recommendations:** N/A

**Other Investigation Recommendations:** N/A

**Any Other Document:** N/A

**Feedback Notes for the Regulated Community**

The Regulated Community are invited to offer feedback about the proposed amendment in the following areas:

- Air or Flight Safety impact
- Operational impact
- Errors or omissions
- Timescale for implementation
- Cost of implementation
- Amendment to internal processes/orders
- Resourcing the outcome of change
- (Contract amendments because of the change)

The format for feedback is available within a single Excel Template file on both internal and external MAA websites; it is important to use this format to ensure that your responses are considered and answered correctly.

### **Summary of Proposed Amendment**

**Objective:** To ensure RA 1910 remains up-to-date with current MoD aviation terminology and policy.

**Changes made:** RA 1910 has been amended to incorporate RFC's and the change to Quinquennial reviews.

**Impact Assessment:** Minimal.

**Consultation Period Ends:** 6 June 2024

The consultation period for this proposed amendment ends on the stated date. Please send your feedback, using the Response Form, via email to [DSA-MAA-MRPEenquiries@mod.gov.uk](mailto:DSA-MAA-MRPEenquiries@mod.gov.uk)

#### *MAA Approval*

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## RA 1910 - Quality Assurance of aviation fuel from non-UK MOD Sources

### Rationale

There may be a requirement to uplift aviation fuel from non-UK MOD Aerodromes<sup>1</sup>. There is a Risk that the fuel available may not match the grade, specification and quality required by the consumer ► **Aircraft**. ◀ This can be mitigated by application of processes and / or local orders to ensure appropriate actions are taken when uplifting non-UK MOD aviation fuels.

### Contents

#### 1910(1): Quality Assurance of aviation fuel from non-UK MOD Sources

### Regulation

#### 1910(1)

#### Quality Assurance of aviation fuel from non-UK MOD Sources

1910(1) Aviation Duty Holders (ADH) and Accountable Managers (Military Flying) (AM(MF)) **shall** ensure that non-UK MOD sourced fuel is uplifted from an appropriate source and to the appropriate grade, specification and quality.

### Acceptable Means of Compliance

#### 1910(1)

#### Quality Assurance of aviation fuel from non-UK MOD Sources

1. When UK MOD sourced fuel<sup>2</sup> is not available, the ADH / AM(MF) **should** ensure that fuel of an acceptable grade is uplifted from a:
  - a. North Atlantic Treaty Organization (NATO) supply chain,
  - b. UK or Overseas Territories Licensed Aerodrome supply chain,
  - c. UK Civil Aviation Authority (CAA) Certified Aerodrome supply chain,
  - d. European Aviation Safety Agency (EASA) Certified Aerodrome supply chain,
  - e. Federal Aviation Administration (FAA) Certified Aerodrome supply chain, or
  - f. Certified Commercial Airport supply chain.
2. When fuel is not available from a UK MOD source or those supply chains listed in paragraph 1, the ADH / AM(MF) **should** ensure that:
  - a. For planned occurrences, the fuel quality is checked at a suitable point prior to uplift (eg via use of an Advanced Party).
  - b. For unplanned and operational requirements:
    - (1) The minimum quantity required is uplifted.
    - (2) On arrival at a UK MOD supported site, the remaining Aircraft fuel is sampled and tested (eg by 1710 Naval Air Squadron (1710NAS)) and Type Airworthiness Authority (TAA)<sup>3</sup> advice sought as required.
3. Uplifted fuel found to be not suitable, in accordance with (iaw) the Release To Service (RTS)<sup>4</sup> or appropriate Military Permit to Fly (MPTF)<sup>5</sup>, or deemed to be contaminated **should** be removed from the Aircraft (prior to next flight)<sup>6</sup>, except where

<sup>1</sup> This includes UK and non-UK Aerodromes that are not owned by the UK MOD.

<sup>2</sup> "UK MOD sourced fuel" is deemed to be either: supplied by a UK MOD supplier / source; or fuel that complies with JSP 317 aviation fuel quality control and Assurance procedures and where fixed Bulk Fuel Installations are audited by the MOD's Fuel and Gas Safety Regulator.

<sup>3</sup> Where the Air System is ► **not-UK MOD-owned, Type Airworthiness (TAW) management regulatory responsibility by either the** ◀ TAA or Type Airworthiness Manager (TAM) needs to be agreed within the Sponsor's approved model; ► ◀ refer to RA 1162 – Air Safety Governance Arrangements for Civilian Operated (Development) and (In-Service) Air Systems, or refer to RA 1163 – Air Safety Governance Arrangements for Special Case Flying Air Systems. ► **Dependent on the agreed delegation of TAW responsibilities TAM may be read in place of TAA as appropriate throughout this RA.** ◀

<sup>4</sup> Refer to RA 1300 – Release To Service.

<sup>5</sup> Refer to RA 1305 – Military Permit to Fly (In-Service), (Special Case Flying) and (Single Task) or RA 5880 – Military Permit to Fly (Development) (MRP 21 Subpart P).

<sup>6</sup> iaw the Air System's Technical Instructions.

**Acceptable  
Means of  
Compliance  
1910(1)**

deemed operationally essential<sup>7</sup>, and the Continuing Airworthiness Management Organization informed.

**Guidance  
Material  
1910(1)**

**Quality Assurance of aviation fuel from non-UK MOD Sources**

4. All Licensed Aerodromes<sup>8</sup> within the UK must, iaw the Air Navigation Order<sup>9</sup>, ensure their fuel is fit for use in Aircraft.
5. All Licensed Aerodromes within UK Overseas Territories must, iaw the Air Navigation (Overseas Territories) Order<sup>10</sup>, ensure their fuel is fit for use in Aircraft.
6. UK Unlicensed Aerodromes are guided to comply with the Air Navigation Order<sup>11</sup>.
7. EASA Certified Aerodromes<sup>12, 13</sup> will ensure their fuel is fit for purpose, uncontaminated and of the correct specification. Furthermore, EASA Air Operation Regulations require that Certified Aerodromes detail their procedures and management systems within an Operations Manual<sup>14</sup>.
8. UK CAA Certified Aerodromes<sup>15</sup> will ensure their fuel is fit for purpose, uncontaminated and of the correct specification.
9. FAA Certified Aerodromes<sup>16</sup> will ensure their fuel is fit for purpose, uncontaminated and of the correct specification.
10. Certified Commercial Airports across the majority of the world, self-regulate the quality of fuel at uplift with no International Civil Aviation Organization / CAA mandatory requirements. Whilst absolute confirmation cannot be given as a result the participation of the Energy Institute / Joint Inspection Group standard 1530<sup>17, 18</sup> testing regimes and the International Air Transport Association Fuel Quality Pool mean that reasonable confidence can be taken in the quality of fuel at any Certified Commercial Airport.
11. Aviation fuel Quality Assurance (QA) is based on certification at the point of manufacture and subsequent procedures to verify that the quality remains within specification limits through to delivery to the ► Aircraft fuel ◀ tanks. Documentation is an essential part of this process; and when fuel is not available from a UK MOD source or those supply chains listed in paragraph 1, ADHs and AM(MF)s are strongly encouraged to obtain copies of test certificates as evidence of fuel quality. Key documents likely to be available from a supplier are:
  - a. **Refinery Certificate of Quality (RCQ).** Produced at the point of manufacture; it is the definitive original document describing the quality of a batch of aviation fuel.
  - b. **Certificate of Analysis.** Issued by a laboratory downstream from the point of manufacture; it contains determinations of the properties required in the relevant specification.
  - c. **Recertification Test Certificate.** Produced where there is a risk of cross contamination, ie multiproduct pipelines or ocean-going tankers. The results are compared to the original RCQ to ensure the quality of the product has not been compromised during transfer.

<sup>7</sup> Refer to RA 1020 – Aviation Duty Holder ► ◀ – Roles and Responsibilities.

<sup>8</sup> A list of UK CAA Licensed Aerodromes is available here: <https://www.caa.co.uk/Commercial-industry/Airports/Aerodrome-licences/Licences/Aerodrome-licences-and-boundary-maps>.

<sup>9</sup> Refer to The Air Navigation Order 2016 Part 8, Chapter 1, Article 220.

<sup>10</sup> Refer to Statutory Instrument 2013 No. 2870 – The Air Navigation (Overseas Territories) Order 2013.

<sup>11</sup> Refer to CAP 793 – Safe Operating Practices.

<sup>12</sup> A list of EASA Certified Aerodromes is available here: <https://www.easa.europa.eu/domains/aerodromes>.

<sup>13</sup> Refer to EU Regulation (EU) No 2018/1139.

<sup>14</sup> Refer to EU Commission Regulation (EU) No 965/2012.

<sup>15</sup> A list of UK CAA Certified Aerodromes is available here: <https://www.caa.co.uk/Commercial-industry/Airports/Aerodrome-licences/Certificates/UK-certificated-aerodromes>.

<sup>16</sup> Refer to FAA Regulation 121.373 – Continuing analysis and surveillance.

<sup>17</sup> Refer to EI / JIG 1530 – Quality assurance requirements for the manufacture, storage and distribution of aviation fuels to airports.

<sup>18</sup> <http://www.energyinst.org/technical/safety/aviation/1530>.

**Guidance  
Material  
1910(1)**

- d. **Release Certificate.** An operational document linked to one or more laboratory test certificates; it authorizes any transfer of aviation fuel (including to airports), confirming compliance with a relevant specification.
12. When fuel is not available from a UK MOD source or those supply chains listed in paragraph 1, additional field tests are undertaken and results recorded as part of the overall QA process; these include Periodic Tests, Appearance Checks, Membrane Filtration Tests, Control Checks, Conductivity and Microbiological Tests. Copies of such reports may also be available on request from the supplier.
13. Advice and guidance on fuel testing, retrospective fuel analysis and technical assurance can be obtained from the Defence Strategic Fuels Authority<sup>19</sup> (Bulk Fuels, JSP 317) or 1710NAS<sup>20</sup> (Aircraft samples).
14. The Air System's RTS or MPTF will include details of the normal and alternative fuel grades and specifications that are compatible.

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<sup>19</sup> Email [UKStratCom-DefSp-DSFATechMulti@mod.gov.uk](mailto:UKStratCom-DefSp-DSFATechMulti@mod.gov.uk).

<sup>20</sup> Email [NAVY1710NAS-MIGCIS@mod.gov.uk](mailto:NAVY1710NAS-MIGCIS@mod.gov.uk).

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