



DOSR/RN/2023-03 – MOD Fieldcraft Training Areas Licensing Process

Date: 18 Oct 2024

References

- A. DSA 03.OME Part 3 Volume 1 Part 2 - Defence Code of Practice (DCOP) for Ranges.
- B. DSA 03.OME Part 3 Defence Code of Practice (DCOP) 313 Series – Fieldcraft Training Areas (FTA).
- C. DSA 02 – Ordnance, Munitions and Explosives (OME) Regulations – Reg 313 Fieldcraft Training Areas.
- D. Organisational Safety Assessment (OSA) for Licensing of MOD Fieldcraft Training Areas dated Oct 23.

Purpose

1. The purpose of this DRN is to circulate an early update to the regulations, requirements and guidance to references A and B.

Aim

2. This DRN is aimed at all service and civilian personnel involved with the management and conduct of MOD Fieldcraft Training Areas.

Implementation

3. Effective 25 Oct 2023.
4. Updated 18 Oct 2024 (see footnote 3 on page 7 for change).

Background

5. Barring high velocity projectiles, the use of OME on MOD Dry Training Areas (DTA) practically mirrors that used on Live Firing Tactical Training Areas (LFTTA). However, the DTA are subject to little of the physical and regulatory control afforded to LFTTA or ranges. Furthermore, DTAs are readily accessible to the public, their access controlled by byelaws that are outdated, and therefore ignored. Therefore, there is a heightened level of risk to the user and the public alike from OME whilst on a DTA. It was agreed by the DRSCWG - sub working group that a DTA would be renamed as a Fieldcraft Training Area (FTA).

6. A Defence Ranges Safety Committee Working Group (DRSCWG), sub Working - Group conducted an analysis of several Courses of Action (CoA) to increase safety and accountability to improve culture and behaviors. This benefit will be realised by influencing a positive change in our culture and behaviour to achieve a common level of understanding across the MOD and on our approach to OME risk.

Recommendations

7. It was recommended that:



- a. **Regulating FTA Safety – Licensing of MOD Fieldcraft Training Areas.** To achieve regulatory independence, DOSR shall assume responsibility for formal Licensing of all MOD FTAs both in UK and overseas.
 - b. **Managing FTA Safety.** Service Command / TLBs / EOs shall continue to be responsible for the management and operational safety of their FTA.
 - c. **Assurance Process.** All FTAs will be subject to the 3 stages of Assurance process.
8. **Alignment with 1, 2 and 3 Lines of Defence Assurance LoDA.** The licensing process will ensure there is early engagement, a common understanding and agreement on the route to compliance, by ensuring there is coherence in the 3 stages of assurance by having this more consistent approach. It will also address the Defence Safety Review Recommendation as it will enable the Regulator to exercise an appropriate degree of independent oversight of the use OME on MOD FTAs and, where appropriate, to exert influence to improve his independent assurance reporting via the Annual Assurance Report to DG DSA.

Regulatory Compliance

9. All FTAs shall have in place the necessary requirement from the list below (appropriate to FTA category) before any training:
- a. An FTA shall be licenced with the OME Regulator.
 - b. An FTA shall have a nominated Administering Unit (AU).
 - c. A Site-Specific Risk Assessment (RA) is to be undertaken.
 - d. Site-Specific SOs are in place for the FTA.
 - e. Each FTA (less Category 3) shall have an FTA file, maintained by the AU.
 - f. The use of the FTA shall be pre-booked and recorded.
 - g. Appropriate control measures shall be put in place for the duration of the training.
 - h. Provision to clear the FTA of all OME as reasonably practical and leave it in a safe condition after use as prescribed in Standing Orders.
 - i. Procedures for Disposal are to be in place.
 - j. Works Technical Inspections will be required for specific infrastructure i.e., buildings, bridges, tunnels.
 - k. A MOD Form 1930 - Safe Activity Assurance Form shall be submitted by the Exercising Unit for all activity on an FTA and checked by the AU to ensure it does not exceed the allowed parameters in the MOD licence and Standing Orders.
 - l. If the AU is responsible for more than one FTA, they shall produce a Daily Safety Summary.



FTA Categories

10. All MOD FTA's will be categorised as follows:

Ser	Category	Descriptor
1	Category 1	An FTA where: <ul style="list-style-type: none"> Blank / MRTS / ammunition / pyrotechnics are used. OME (including BATSIM) that will require disposal charge action should it fail to function.
2	Category 2	An FTA where: <ul style="list-style-type: none"> Blank / MRTS / ammunition / pyrotechnics are used. OME that will NOT require disposal charge action should it fail to function.
3	Category 3	A Permanent FTA where no OME is used ¹ . <ul style="list-style-type: none"> Non - OME activities are conducted and listed within the schedule of MOD Form 1925.

Acceptable Means of Compliance

11. For an FTA to be fully compliant with Reference B, the following is determined as the Acceptable Means of Compliance (AMC):

- a. Proof that the FTA is recorded in the DOSR register.
- b. A suitable and sufficient RA² is available.
- c. FTA SOs are available.
- d. MOD Form 1930 - Safe Activity Assurance Form, Exercise Action Safety Plan (EASP), Exercise Safety Document (ESD) or Activity Safety Plan is to be written by the exercising unit.
- e. Confirmation that the FTA has been pre-booked and approved for use.
- f. Appropriate control measures signage is deployed that warn the public of the training activities and potential hazards.
- g. It is demonstrated that time is given to sweep the FTA of OME, and clean-up as required.
- h. Works Technical Inspections will be required for specific infrastructure i.e., buildings, bridges, tunnels, obstacle courses etc.

¹ The purpose of registering Cat 3 FTA is to hold a central MOD database which can be used by other defence regulators to provide regulation and guidance for other non OME activities.

² In accordance with JSP 375, Chapter 8.



- i. A MOD Form 1930 - Safe Activity Assurance Form shall be submitted by the Exercising Unit for each FTA OME activity and checked by the AU to ensure it does not exceed the allowed parameters in the MOD Licence and Standing Orders.

Licensing of Permanent / Temporary FTAs in the UK and Overseas

12. Regulated Community (RC) can begin to register FTAs on 30 Oct 23 provided that the FTA has been subject to either 2 / 3 LoDA annual inspection and the FTA is classed as Safe and fit for purpose. All overseas Temporary FTAs must be registered with DOSR starting Dec 23. All MOD FTAs will be fully compliant with DCOP 313 and under the new DOSR Licensing scheme by **Oct 2026**.

MOD Fieldcraft Training Areas Licensing Process Timeline

Stage 1 - Preparation

- 2 LoDA identify FTAs, begin inspections and prepare documentation.
- Conduct trial DOSR / DIO / RAF.

Stage 2 – Begin Licensing

- 30 Oct 23 – 2 LoDA submit documentation to DOSR.
- Dec 23 – Licensing of overseas FTAs.
- RSIT inspect FTA complex.

Stage 3 - Review

- 2024 DOSR / Regulated Community review process.
- Review TOPL

Stage 4 - Completion

- Oct 2026 all MOD FTAs fully compliant with DSA03.OME Part 3 DCOP 313.

13. In preparation of Inspection and Licensing, the following actions are required by Service Commands / TLB / EOs:

a. **Service Command / TLB / EO:**

Ser	Task	Remarks
1	Formal Appointment of Approving Officers (AO).	Must be a minimum of OF4 or equivalent grade.
2	Identify requirements of posts for SQEP 2 LoDA to achieve Organisational Separation.	Consider recruitment campaign. Addition training requirement. Funding. Consider the requirement for Overseas 2 LoDA / SQEP Individual both permanent and Temporary FTA.
3	Nomination of Administering Unit (AU).	Appointed CO / HoE / Manager. Appointed 1 LoDA Monthly Inspections. FTA Safety Officers / Training Safety Marshalls.



b. **Approving Officers (AO) and Administering Unit (AU):**

Ser	Task	Remarks
1	AO / AU Conduct a review of all FTAs.	Convert to Categories 1-3.
2	Produce Site Specific Risk Assessment for each Complex and individual FTA.	To be updated with revised licensing process.
3	Produce FTA Standing Orders for each Complex and individual FTA.	Must be approved by AO.
4	Produce FTA File for each Complex and individual FTA. A MOD Form 1925 for a Complex and Individual FTAs require an MOD Form 1925.	Must contain as a minimum: <ul style="list-style-type: none"> Copies of all relevant proceedings. Reports. Monthly / Annual / Independent Reports. Waivers (if applicable). Correspondence relating to licensing. MOD Form 1925 (when registered). Works Technical Inspection Reports.
5	Nominate SEQP Individual to conduct Monthly Inspections.	Consider necessary training involved.
6	Appointed FTA Training Safety Officers / Training Safety Marshalls.	If applicable.
7	In consultation with 2 LoDA prepare draft MOD Form 1925.	Submitted to DOSR on completion of 2 LoDA Annual Inspection. Each individual FTA will require a MOD Form 1925 and if an FTA Complex a MOD Form 1925 is also allocated after allocated FTA numbers are issued by DOSR.

c. **2 LoDA**

Ser	Task	Remarks
1	Appointed by Service Commands / TLB / EO or AO within FLC.	Identify Job Specification / SQEP / Functional Competences. Training Gaps identified – attend courses, DIO Estate Safety Course, Risk Safety Management.
2	Liaison / Consultation with AU for future Annual Inspections.	Identify yearly schedule.

14. Licensing of Permanent FTAs in the UK and Overseas. The following procedure outlines the process for licensing of permanent FTAs in the UK and Overseas:

a. **Category 1 and 2 FTA:**

Ser	Task	Remarks
1	AO and AU Identified. AU identify FTAs by Category.	N/A



Ser	Task	Remarks
	<p>AU produce Site Specific Risk Assessment - The CO / Head of Establishment / Manager of the AU will always be responsible for the safety of any MOD FTA or FTA Complex which they complete a Site-Specific Risk Assessment and FTA Standing Orders (FTA SO) regardless of who controls the budget or who is the AO. The AU is responsible for ensuring the site-specific risk assessment and FTA SO remain current and are reviewed and signed annually.</p> <p>AU produce FTA Standing Orders - see above.</p> <p>AU produce FTA File covering:</p> <ol style="list-style-type: none"> (1) Copies of all relevant (2) proceedings / certificates. (3) Reports. (4) Maps. (5) Monthly / Annual / Independent reports. (6) Waivers if applicable. (7) Correspondence relating to authorisation. (8) Works Technical Reports. <p>AU produce Daily Safety Summary (if applicable):</p> <ol style="list-style-type: none"> (1) FTA Name. (2) FTA Usage date. (3) Unit / Organisation Name. (4) Facility / FTA Name. (5) Type of Activity. (6) Start / End Timings. (7) Any Unsafe Facilities. <p>In consultation with 2 LoDA prepare a draft MOD Form 1925.</p> <p>Arrange with 2 LoDA for an Annual Inspection to be conducted.</p> <p>An FTA shall be subject to an Annual Inspection by 2 / 3 LoDA using MOD Form 1928 / DOME and must meet the essential criteria for its safe continued use.</p>	<p>2 LoDA to send completed MOD Form 1925 to AO for approval and digital signature.</p> <p>2 LoDA to send completed MOD Form 1925 to: dsa-dosr-fta@mod.gov.uk along with the following documentation:</p> <p>Completed MOD Form 1928, Map (preferably PDF format) with FTA boundary, OOB, ERVs and other relevant information of the FTA or FTA complex.</p> <p>DOSR will approve, allocate an FTA number and return, recorded on DOME.</p> <p>MOD Form 1925 to be held at FTA location and with AU in FTA file.</p> <p>AUs are responsible for checking the MOD Form 1930 - Safe Activity Assurance Form to ensure that the activity does not exceed the allowed parameters in the MOD Licence.</p>



Ser	Task	Remarks
	<p>On completion of Annual Inspection all relevant documentation including MOD Form 1925 is to be submitted to AO for their formal approval.</p> <p>A MOD Form 1925 for a Complex and Individual FTAs require an MOD Form 1925.</p> <p>MOD Form 1930 - Safe Activity Assurance Form shall be submitted by the Exercising Unit to the AU, 15 working days before any planned activity.</p>	N/A

b. **Category 3 FTA:**

Ser	Task	Remarks
1	<p>Service Commands / TLB / EO formally appoint AO and AU.</p> <p>2 LoDA Prepare MOD Form 1925 - Schedule to record non- OME activities.</p> <p>No Annual Inspection required.</p> <p>No requirement for AU signature.</p>	<p>2 LoDA to send completed MOD Form 1925 to: dsa-dosr-fta@mod.gov.uk.</p> <p>DOSR will approve allocate an FTA number and return, recorded on DOME.</p> <p>No requirement for FTA file.</p>

15. **Licensing of Temporary FTAs in the UK and Overseas.** The following outlines the process for the licensing of temporary FTAs in the UK and Overseas³.

Ser	Task	Remarks
1	<p>Service Command / FLC are to appoint AO, AU and 2 LoDA / SQEP individual identified.</p> <p>Nominated 2 LoDA / SQEP individual must attend initial Recce (Cat 1 & 2).</p> <p>AU identify Cat 1 and 2 FTAs.</p> <p>AU produce Site Specific Risk Assessment - The CO / Head of Establishment / Manager of the AU will always be responsible for the safety of any MOD FTA or FTA Complex which they complete a Site-Specific Risk Assessment and FTA Standing Orders (FTA SO) regardless of who controls the budget or</p>	N/A

³ **MAB Ops and FGEN.** Any training venue that is used for a short period using the OTR process and approved by a minimum of OF5, **or by exception OF4** from the 2* formation HQ shall be subject to a site-specific risk assessment. If the training is higher that level 3, the Temporary FTA process shall be followed.



Ser	Task	Remarks
	<p>who is the AO. The AU is responsible for ensuring the site-specific risk assessment and FTA SO remain current and are reviewed and signed annually.</p> <p>AU produce FTA Standing Orders - see above.</p> <p>AU produce FTA File:</p> <ol style="list-style-type: none"> (1) Copies of all relevant proceedings / certificates. (2) Reports. (3) Maps. (4) Monthly / Annual / Independent reports. (5) Waivers if applicable. (6) Correspondence relating to authorisation. (7) Works Technical Reports. <p>AU produce Daily Safety Summary (if applicable):</p> <ol style="list-style-type: none"> (1) FTA Name. (2) FTA Usage date. (3) Unit / Organisation Name. (4) Facility / FTA Name. (5) Type of Activity. (6) Start / End Timings. (7) Any Unsafe Facilities <p>Requirement for MOU or Technical Agreement.</p> <p>In consultation with 2 LoDA / SQEP prepare a draft MOD Form 1926.</p> <p>2 LoDA / SQEP individual to conduct Annual Inspection using MOD Form 1928.</p> <p>An FTA shall be subject to an Annual Inspection by 2 LoDA / SQEP individual using MOD Form 1928 and must meet the essential criteria for its safe continued use.</p> <p>On completion of Annual Inspection all relevant documentation including MOD Form 1926 is to be submitted to AO for their formal approval.</p> <p>A MOD Form 1926 for a Complex and Individual FTAs require an MOD Form 1926.</p>	<p>2 LoDA / SQEP individual to send completed MOD Form 1926 to AO for approval and digital signature.</p> <p>2 LoDA SQEP individual to send completed MOD Form 1926 to: dsa-dosr-fta@mod.gov.uk along with the following documentation:</p> <p>Completed MOD Form 1928, Map (preferably PDF format) with FTA boundary, OOB, ERVs and other relevant information of the FTA or FTA complex. Site Specific Risk Assessment and FTA Standing Orders.</p> <p>DOSR will approve, allocate an FTA number and return, recorded on DOME.</p> <p>MOD Form 1926 to be held at FTA location and with AU in FTA file.</p> <p>AUs are responsible for checking the MOD Form 1930 - Safe Activity Assurance Form to ensure that the activity does not exceed the allowed parameters in the MOD Licence.</p>



Ser	Task	Remarks
	AU shall retain FTA file for 10 years. MOD Form 1930 - Safe Activity Assurance Form shall be submitted by the Exercising Unit to the AU, 15 working days before any planned activity.	Note: 2 LoDA / SQEP personnel are to submit Temporary FTA documentation to DOSR 28 days before any planned activity.

Management Arrangements

16. To deliver the necessary change to transition to the new scheme as efficiently and effectively as possible, the following management arrangements are necessary:

- a. **Approving Officer.** An Approving Officer (AO) must be appointed for all FTAs by Service Command / TLB / EOs and must be a minimum of OF4 Rank or grade.
- b. The AO is responsible for:
 - (1) Personally, certifying the weapon systems, munitions and explosive stores which can be used on an FTA and for setting any limitations or restrictions on their use.
 - (2) On assuming duties of AO or transfer of AO they are to review all FTA licences they are responsible for.
 - (3) The responsibility for bringing a MOD FTA into to use on either a permanent or temporary basis.
 - (4) Before approving a MOD Form 1925 / 1926 for an FTA, the AO is to ensure that FTA Standing Orders and Site-specific Risk Assessments are in place.
 - (5) The AO are to approve FTA Standing Orders before they are first issued and is responsible for ensuring they are signed by CO / Head of Establishment / Manager of the AU.
 - (6) Before permission is given for a Single Service controlled FTA to be used by another Service or for a DIO controlled FTA to be used by a Service, the AO shall be satisfied that all OME or devices to be used comply in all respects with MOD Form 1925 / 1926 and FTA Standing Orders.
 - (7) Bringing a MOD FTA into use as a Temporary FTA either in UK or overseas.
 - (8) Oversight of the appointment and management of a Suitably Qualified Experience Person (SQEP) 2 LoDA responsible for the conduct of Annual Inspections of FTAs.
 - (9) AUs are responsible for checking MOD Form 1930 - Safe Activity Assurance Form to ensure that the activity does not exceed the allowed parameters in the MOD Licence
- c. **Administering Unit.** An Administering Unit (AU) is to be established for all FTAs used by MOD Service and civilian personnel on duty both in UK and overseas by Service Command / TLB / EO. The CO / Head of Establishment / Manager of the AU does not need to be in the same command / line management chain as the AO but is accountable to the AO for the safe operation of an FTA or Complex FTA. They are responsible to the Service / Agency controlling the budget for the FTA for the safe operation and maintenance of FTA structures and equipment.



Conclusion

17. This DOSR Regulatory Notice outlines transitional arrangements to enable the MOD to improve efficiency and safety assurance for MOD FTA. Successful delivery of this proposal will also address recommendations from the Defence Safety Regulatory Review dated 20 Apr 16 which was a review of 2 and 3 Line of Defence Assurance (LoDA), both of which reached similar conclusions regarding the lack of independent formal 3 LoDA on MOD FTAs. It will also ensure that The Regulatory approach was developed regarding the Regulators' Code to ensure it is both proportionate and consistent, and to ensure it conforms to the Secretary of State for Defence Policy Statement on Health, Safety and Environmental Protection, the DSA's Charter and DOSR's Letter of Authority and Responsibility as a Defence Regulator issued by DG DSA.

Related Forms:

18. The following forms are available on the [DOSR Forms, Notices and Regulations](#) page.

- MOD Form 1925 - Permanent FTA Licence
- MOD Form 1925 - Permanent FTA Licence (including continuation sheet)
- MOD Form 1926 - Temporary FTA Licence
- MOD Form 1926 - Temporary FTA Licence (including continuation sheet)
- MOD Form 1927 - Monthly Inspection
- MOD Form 1928 - Annual 2 LODA Inspection Report
- MOD Form 1930 - Safe Activity Assurance Form (SAAF)

Queries

19. Any observations or requests for further guidance on the content of this DRN should be submitted by email to brendan.ocallaghan155@mod.gov.uk.

Stephen A. Gillstroem McLean, MIEXPE, PIEMA
DOSR TL