



17 February 2025

## MAA/RI/2025/01 – RA1600 Series: Updated Special Purpose Clearance (SPC) Process

### References:

- A. RA 1600 – Remotely Piloted Air Systems.
- B. RA 1601 – Remotely Piloted Air Systems Open A1 sub-category (Fly ‘Over’ People).
- C. RA 1602 – Remotely Piloted Air Systems Open A2 sub-category (Fly ‘Close To’ People).
- D. RA 1603 – Remotely Piloted Air Systems Open A3 sub-category (Fly ‘Far From’ People).
- E. RA 1604 – Remotely Piloted Air Systems Specific S1 sub-category.

### Issue

Across Defence, there is an expanding demand for additional permissions across the Open and S1 Uncrewed Air Systems (UAS)<sup>1</sup> Categories, especially around Beyond Visual Line Of Sight (BVLOS) operations. In order to appropriately and rapidly address this demand, further guidance is required to explain and expand the potential routes to Regulatory derogation through Special Purpose Clearance (SPC).

### Scope

This Regulatory Instruction (RI) provides guidance on, and identifies the required information to support, the revised process for the agreement of Special Purpose Clearances, for Open and Specific S1 Letter of Endorsed Categorisation (LEC) holders. The RI will also introduce the requirement for the Regulated Community (RC) to identify an additional level of Assurance from a Suitably Qualified and Experienced Person(s) (SQEP) Aviation Assurance organization to support their application for additional clearances. The RI extends the remit of SPC from S1 to include the Open class and removes the requirement for a UAS SPC to be associated to a specific named Operation as this is no longer considered proportionate. The current 6-month limit on SPC’s is also deemed to be overly restrictive and burdensome.

### Aim

This RI aims to provide guidance to the Open Category and Specific S1 sub-category UAS Regulated Community on how and when they can request additional clearances beyond the operating baseline defined in the 1600 series of Regulations.

### Implementation

This RI is effective once published.

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<sup>1</sup> Note: The MAA is planning on updating the MAA’s Regulatory Publications by replacing the term Remotely Piloted Air System (RPAS) with Uncrewed Air System (UAS) to account for the introduction of Autonomous Air Systems (which will have limited / no Remote Pilot).



## **Background / Introduction**

Following a Regulatory Working Group, held at the MAA, it was determined that there is an increasing demand signal for freedom of operation for Open and S1 UAS. When this demand is supported by an appropriate Risk wrapper, there should be a proportionate route to increased Regulatory permissions. To enable this, an additional request form would be submitted as an appendix to RA 1600 Annex B. This would ensure sufficient Oversight and Assurance supports the request for additional permissions beyond the baseline LEC. It will also require an internal reassessment process for the RC to ensure that any permission is continually assessed for its validity. The MAA must be notified as and when these additional clearances are no longer required, or if the supporting justification or Risk picture has changed, with the LEC or additional clearances updated accordingly. Additional clearances can be granted for a maximum of 24 months at which point an MAA review is required with the submitting organization.

## **Transitional Arrangements**

This RI will be superseded by the reissue of the 1600 series in due course. SPCs granted prior to the issue of this RI will remain valid until their extant expiry date.

## **Queries**

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

**Deputy Head Operations, Operating Assurance Group**



## ANNEX B – APPENDIX 2

### Additional Specific Purpose Clearance Checklist

Units who currently hold or are in the process of applying for an Open / Specific S1 LEC or have an existing SPC may submit this appendix to seek additional operating clearances. All areas below **should** be covered as a minimum. **Where examples are given, they are not exhaustive.**

#### 4. Special Purpose Clearance Submission.

##### 4.1 Details of the Operating Intent / additional clearance(s).

*{Please relate the request to the specific area of the Regulation that you require derogations from, including the MOD benefit in doing so (eg Operating Range)}*

##### 4.2 Operating Area(s).

*{Detail the areas for operation including details of permissions where applicable}*

###### a. Airspace considerations.

*{Detail the airspace to be used, this should include details of how you will segregate airspace, provision of suitable surveillance of the operating area, communication methods between the Remote Pilot (RP) and the surveillance provider, a method for location of the Uncrewed Aircraft, methods of providing conspicuity to other air users (eg Automatic Dependent Surveillance Broadcast (ADS-B)), Methods for maintaining safe separation from other Air Systems.*

###### b. Ground considerations.

*{Details should be provided of any populated areas within the operating area(s) as well as suitable mitigation to prevent Risk to both involved and uninvolved persons. State any additional considerations towards Risk for involved persons}*

##### 4.3 Operating limitations, conditions, and related factors.

*{Minimum and maximum operating conditions and limitations; reference any applicable limitations document if available and / or applicable}*

##### 4.4 Systems you require to utilise for the additional permission(s) and their suitability.

*{Any system not on the LEC will also require Appendix 1 to Annex B to be submitted. For UAS already on the LEC their suitability should be derived from the Original Equipment Manufacturer}*

##### 4.5 Timeline for the clearance(s) to be applicable<sup>2</sup>.

*{For enduring timelines additional justification should be provided demonstrating an internal review and assessment process for the enduring validity of the clearance}*

##### 4.6 Independent Assurance Organization – Identify the competent organisation(s) that are responsible for your aviation Assurance.

*{This is requested to provide a supporting Assurance structure for all units wishing to apply for additional permissions.}*

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<sup>2</sup> Maximum of 24 months in line with the current validity of the LEC.



**4.7 Training.**

*{Detail additional Senior Operator / Flight Operations Post Holder / Remote Pilot Instructor / RP training considerations detailed by the UAS Responsible Officer / UAS Accountable Manager that have been or will be undertaken to enable the activity covered in 4.1. If the individual is deemed suitably qualified and experienced, please evidence this}*

**4.8 Additional mitigations.**

*{Highlight additional aggravating factors and their mitigations in support of the activity highlighted in 4.1. Demonstrate how the residual risks remain As Low As Reasonably Practicable (ALARP) and Tolerable}*



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