

► This RA has been substantially re-written; for clarity no change marks are presented – please read RA in its entirety ◀

RA 1031 – Contractor Flying Approved Organization Scheme (Basic Uncrewed Air Systems)

Rationale

Civilian organizations are required to operate UK military registered Uncrewed Air Systems (UAS) in the Open Category and Specific S1 UAS sub-category¹. Without appropriate regulatory oversight of such organizations, persons could be exposed to unnecessary Risk. This Regulatory Article (RA) defines the regulatory framework required for the Contractor Flying Approved Organization Scheme (Basic UAS) (CFAOS (BU))² which in turn ensures such organizations comply with the MAA Regulatory Publications (MRP) and are subjected to appropriate Regulatory oversight.

It details the requirements for a supporting organization and the appointment of an Accountable individual, the UAS Accountable Manager (UAS AM), to maintain Safety and standards, the method / conditions to gain Approval, and the appointment / duties of an appropriate Sponsor. The regulatory framework is Structured to be proportionate to the Open Category and Specific S1 sub-category and their physical attributes, and to permit appropriate operating freedoms to 'non-traditional' civilian aviation organizations commensurate with the Risks presented.

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Organization

1031(1) Civilian organizations operating UK military registered UAS in the Open Category or Specific S1 sub-category **shall** be appropriately regulated, structured, and controlled.

Acceptable Means of Compliance

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Organization

1. Civilian organizations that operate³ UK military registered UAS in the Open Category or Specific S1 sub-category **should** be an approved organization in accordance with (iaw) the CFAOS (BU)⁴.
2. CFAOS (BU) organizations **should**:
 - a. Comply with RA 1600⁵ and:
 - (1) RA 1601⁶ for UAS operated in the Open A1 sub-category.
 - (2) RA 1602⁷ for UAS operated in the Open A2 sub-category.
 - (3) RA 1603⁸ for UAS operated in the Open A3 sub-category.
 - (4) RA 1604⁹ for UAS operated in the Specific S1 sub-category.
 - b. Hold an appropriate CFAOS (BU) Approval Certificate prior to operation of any UK military registered UAS.
 - c. Operate iaw the scope of their CFAOS (BU) Approval Certificate.

¹ As defined in RA 1600 – Uncrewed Air Systems Categorization.

² Organizations operating under the CFAOS (BU) may be referred to as CFAOS (BU) organizations.

³ Civilian Operated (In-Service), and Civilian Operated (Development), and Civilian Operated (Special Case Flying); refer to RA 1160 – The Defence Air Environment Operating Framework.

⁴ Refer to RA 1031(3): Approval.

⁵ Refer to RA 1600 – Uncrewed Air Systems Categorization.

⁶ Refer to RA 1601 – Uncrewed Air Systems Open A1 sub-category (Fly 'Over' People).

⁷ Refer to RA 1602 – Uncrewed Air Systems Open A2 sub-category (Fly 'Close To' People).

⁸ Refer to RA 1603 – Uncrewed Air Systems Open A3 sub-category (Fly 'Far From' People).

⁹ Refer to RA 1604 – Uncrewed Air Systems Specific S1 sub-category.

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- d. Nominate a UAS AM who is suitably experienced and empowered, with the appropriate freedom, authority and resource to undertake the role.
 - e. Have in place:
 - (1) An MAA endorsed Contractor Flying Organization Exposition (Basic UAS) (CFOE (BU))⁴.
 - (2) An MAA endorsed CFAOS (BU) Operations Manual which conveys how the organization meets the requirements of the CFAOS (BU)⁴ and any outstanding / remaining information from the Category Safety Checklist.
 - f. Ensure that all UAS operated under the CFAOS (BU) are categorized.
 - g. Ensure that personnel assigned to, or directly involved in, UAS flight and ground operations, are appropriately qualified and trained for their duties iaw the RAs at paragraph 2.a (as applicable).
 - h. Ensure that the MAA is:
 - (1) Granted appropriate access to the organization for the purpose of determining initial and continued regulatory compliance.
 - (2) Notified of any change affecting or likely to affect the scope of the CFAOS (BU) Approval.
 - (3) Notified of any change regarding the UAS AM.
3. In addition to the requirements above, CFAOS (BU) organizations conducting Test and Evaluation (T&E) (Civilian Operated (Development)¹⁰ and Civilian Operated (Development) activity), **should** comply with the requirements of RA 2370¹¹.

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Organization

4. The issue and continuation of a CFAOS (BU) Approval is subject to compliance with the relevant Regulations and endorsement by an appropriate Sponsor¹².
5. The following RAs are applicable to UAS operating under the CFAOS (BU):
 - a. RA 1031.
 - b. RA 1161(5)¹³.
 - c. RA 1410¹⁴.
 - d. RA 1600⁵.
 - e. RA 1601⁶, RA 1602⁷, RA 1603⁸ and / or RA 1604^{9, 15}.
 - f. Any relevant Regulatory Instructions and / or Regulatory Notices.
 - g. Any other RAs deemed applicable through:
 - (1) Explicit reference and / or direction to any other RAs within the RAs listed above.
 - (2) The CFAOS (BU) Approval process (such as RA 2370¹¹ for CFAOS (BU) organizations conducting T&E (Civilian Operated (Development) and Civilian Operated (Development) activity); discussion with the MAA CFAOS Branch will be required in order to determine any such applicable RAs.
6. CFAOS (BU) organizations will only be permitted to operate UK military registered UAS in the Open Category and Specific S1 sub-category.

¹⁰ Refer to RA 1160 – The Defence Air Environment Operating Framework.

¹¹ Refer to RA 2370 – Test and Evaluation.

¹² Refer to RA 1031(4): Sponsor.

¹³ Refer to RA 1161(5): Military Open Category / Specific S1 sub-category Remotely Piloted Aircraft Registration.

¹⁴ Refer to RA 1410 - Occurrence Reporting and Management.

¹⁵ The applicability of RA 1601, RA 1602, RA 1603 and / or RA 1604 is dependent on endorsed sub-category; ie RA 1601 is applicable to an organization endorsed for Open A1 sub-category operations, RA 1602 for those endorsed for Open A2 sub-category operations etc. Any organization endorsed for more than one sub-category will apply the respective RAs for all endorsed sub-categories.

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7. CFAOS (BU) organizations will not be permitted to operate UK military registered UAS in the Specific S2 sub-category and Certified Category (these options are restricted to operation under the full CFAOS^{16, 17} or to Military Operated UAS).
8. For the avoidance of doubt:
 - a. All UK military registered UAS that are operated under the CFAOS (BU) must be categorized iaw RA 1600⁵.
 - b. CFAOS (BU) organizations are not required to submit a separate UAS Categorization submission nor hold an MAA Letter of Endorsed Categorization (LEC)⁵. Categorization will be achieved through the CFAOS (BU) Approval process and the CFAOS (BU) Approval Certificate, covers the requirement of UAS Categorization submission and LEC respectively¹⁸.
 - c. The MAA CFAOS Branch will form an internal MAA UAS Categorization Panel which will confirm the valid / applicable UAS Category.
9. The regulatory requirements for an Approval under the CFAOS (BU) is discrete and distinct from a full CFAOS Approval under RA 1028¹⁶ (the two schemes are exclusive). However, there may be benefits in facilitating organizations already holding a full CFAOS Approval to address the requirements for CFAOS (BU) under their extant CFAOS Approval. Therefore, an entity already approved to operate under the CFAOS that subsequently requires to operate under the privileges of the CFAOS (BU) may not be required to possess a separate CFAOS (BU) Approval, instead being required to progress an appropriate CFAOS scope uplift iaw RA 1028¹⁶. However, the regulatory requirement for the operation of UAS in the Open Category and Specific S1 sub-category will always be that described by the CFAOS (BU). Discussion with the MAA CFAOS Branch will be required in order to determine the appropriate route to Approval in such cases.

Regulation 1031(2)

Uncrewed Air Systems Accountable Manager

- 1031(2) UAS operated under the CFAOS (BU) **shall** be under the authority of a UAS AM and be supported by appropriate persons.

Acceptable Means of Compliance 1031(2)

Uncrewed Air Systems Accountable Manager

10. UAS AMs **should**:
 - a. Be responsible and Accountable for the operation of UAS within their Area of Responsibility (AoR).
 - b. Ensure that:
 - (1) The MAA has endorsed:
 - (a) The CFOE (BU)⁴ and;
 - (b) The CFAOS (BU) Operations Manual⁴.
 - (2) UAS are categorized⁵.
 - c. Establish and maintain a process for the update and maintenance of the documents at paragraph 10.b.
 - d. Ensure that Risks to Life (RtL) to Remote Pilots (RP), UAS launch crew, personnel working on supporting or supported Systems, and the general public or other organizational / MOD personnel through operation of UAS within their AoR are As Low As Reasonably Practicable (ALARP) and Tolerable and cease operations if RtL are identified that are not demonstrably ALARP and Tolerable.

¹⁶ Refer to RA 1028 – Contractor Flying Approved Organization Scheme.

¹⁷ The CFAOS is the Assurance mechanism underpinning the Competence of Defence Contractor Flying Organizations that operate crewed Aircraft and Specific S2 sub-category and Certified Category UAS on the UK Military Aircraft Register (MAR).

¹⁸ The MAA CFAOS Branch will form an internal MAA UAS Categorization Panel which will confirm the valid / applicable UAS Category.

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- e. Ensure that UAS are operated iaw:
 - (1) The CFAOS (BU) Approval Certificate.
 - (2) RA 1600⁵ and:
 - (a) RA 1601⁶ for UAS operated in the Open A1 sub-category.
 - (b) RA 1602⁷ for UAS operated in the Open A2 sub-category.
 - (c) RA 1603⁸ for UAS operated in the Open A3 sub-category.
 - (d) RA 1604⁹ for UAS operated in the Specific S1 sub-category.
 - (3) Any other RAs that have been deemed applicable¹⁹.
 - (4) The CFOE (BU)⁴.
 - (5) The CFAOS (BU) Operations Manual⁴.
 - (6) Where applicable, ensure compliance with RA 2370¹¹ for the conduct of T&E (Civilian Operated (Development) and Civilian Operated (Development) activity).
- f. Ensure that any significant changes to their operating Responsibilities or to the supporting Systems that may affect the discharge of their Rtl Responsibilities are reported immediately to the MAA CFAOS Branch²⁰.
- g. Apply for military registration of all Uncrewed Aircraft (UA) to be operated^{13, 21}, or confirm that registration is already in place, and ensure that all UAS are registered prior to operation²².
- h. Ensure that the Sponsor has issued a Certificate of Usage (CofU)¹² for all Civilian-Owned UAS, and that it is submitted as part of the CFAOS (BU) Application.
- i. Hold appropriate Terms of Reference (ToR).
- j. Act as the organization's senior point of contact with the MAA.
- k. Nominate a UAS Flight Operations Post-Holder (FOPH) for UAS operated in the Open A2, Open A3 and Specific S1 sub-categories^{23, 24, 25}.
11. A UAS AM **should** be:
 - a. At least a Middle Manager within the organization.
 - b. Formally responsible for the delivery of safe UAS operations.
 - c. Directly appointed by an appropriate management board.
12. UAS AM nominees **should** apply to the MAA for endorsement to undertake the role of UAS AM, and expect to attend an MAA endorsement interview at which they will be required to provide evidence of suitability to undertake the role.
13. UAS AMs / FOPHs **should** attend an MAA UAS AM briefing day prior to submission of the CFOE (BU), CFAOS (BU) Operations Manual and any other supporting documents, if required to do so by the MAA²⁶.

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Uncrewed Air Systems Accountable Manager

14. **Middle Manager.** The term Middle Manager will be taken to mean a manager who possesses the authority to make independent decisions on UAS operations without recourse to superiors or executives. If they do not sit at Board level (or equivalent divisional level) they will have appropriately delegated authority, and the

¹⁹ See also paragraph 5g.

²⁰ Via DSA-MAA-OpAssure-CFAOS-Group@mod.gov.uk.

²¹ For Open Category and Specific S1 sub-category UAS operated under the CFAOS (BU), application for UK MAR registration is implicit in the CFAOS (BU) application (see also RA 1031(3): Approval).

²² Via DSA-MAA-OpAssure-MAR@mod.gov.uk.

²³ The UAS AM may, where appropriate, also hold the role of UAS FOPH provided it can be clearly demonstrated that such a dual appointment does not conflict with either their UAS AM or UAS FOPH Responsibilities.

²⁴ A UAS FOPH is not required for UAS operated in the Open A1 sub-category.

²⁵ The Responsibilities required of the CFAOS (BU) UAS FOPH are covered in detail within RA 1602, RA 1603 and RA 1604.

²⁶ The requirement will be determined following submission of the MAA CFAOS (BU) Form 2 – refer to RA 1031(3): Approval.

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organization will be required to demonstrate that the individual holds the authority and freedom to execute decisions with respect to UAS operated under the CFAOS (BU).

15. **Suitability.** 'Suitability' for the UAS AM role means being able to demonstrate appropriate knowledge and understanding of the relevant UAS operating principles and of the relevant Regulations and documents that prescribe UAS operating processes and standards. This includes, but is not limited to, the following:

- a. RA 1031.
- b. RA 1161(5)¹³.
- c. RA 1600⁵.
- d. RA 1601⁶, RA 1602⁷, RA 1603⁸, and / or RA 1604⁹.
- e. RA 1410¹⁴.
- f. RA 2370¹¹ (for UAS AMs responsible for T&E activity).
- g. The organization's CFOE (BU)⁴.
- h. The organization's CFAOS (BU) Operations Manual⁴.
- i. Role and Responsibilities of the UAS AM.
- j. Operating Risk.
- k. Role and Responsibilities of the UAS FOPH²⁵.

16. **UAS AM Endorsement**

a. **Application.** UAS AM nominees need to apply to the MAA for endorsement using an MAA CFAOS (BU) Form 4²⁷. Thereafter, and in consultation with the MAA, supporting evidence for endorsement interview will be provided to the MAA CFAOS Branch²⁰ at least 10 working days prior to interview. The organization's CFOE (BU) will provide the foundation of the supporting evidence. Further evidence required will include, but is not limited to:

- (1) Organization Structure, to allow understanding of the UAS AM's position within the organization, including appropriate explanation of the powers / authority held and relational links to relevant areas.
- (2) Explanation of the UAS AM's independence, including access to adequate resource, to allow enactment of regulatory requirements without hindrance.
- (3) For UAS AMs intending to manage or conduct T&E how they intend to comply with RA 2370¹¹.
- (4) A tailored CV detailing the UAS AM's professional background highlighting any involvement with aviation and / or UAS operations.

b. **Interview.** The UAS AM endorsement interview will be led by an MAA CFAOS Branch OF4 representative and will cover 4 broad areas as a minimum: a description of the UAS AM's roles and Responsibilities; their knowledge, skills and experience; how the UAS AM intends to comply with RA 1031, RA 1600⁵ and other applicable Regulations²⁸; and any wider points from the supporting evidence submitted.

c. **Endorsement.** UAS AM endorsement will be in writing and at a minimum level of MAA Deputy Head (OF5).

17. **UAS AM Briefing Day.** The CFAOS (BU) and the approach taken by the MAA is significantly different to that of other Regulators. Therefore, the UAS AM briefing day is designed to inform UAS AMs, UAS FOPHs and compliance personnel of the construct, governance Structure and Regulations that underpin the CFAOS (BU). UAS AMs, UAS FOPHs and compliance personnel will benefit from early attendance on a UAS AM briefing day, prior to the Development of their CFOE (BU), CFAOS (BU) Operations Manual and any supporting documents. Suitable briefing day dates will be

²⁷ The MAA CFAOS (BU) Form 4 can be found on the MAA website <https://www.gov.uk/government/collections/military-aviation-authority-approvals>.

²⁸ Such as RA 2370 – Test and Evaluation, for those UAS AMs who will manage or conduct T&E activity.

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discussed as part of the initial contact with the MAA CFAOS Branch after submission of the MAA CFAOS (BU) Form 2²⁶.

18. **MAA Engagement.** UAS AMs will allow the MAA to examine and / or Audit the organization with respect to the operation of UAS under the CFAOS (BU), and to review the UAS AM endorsement following any significant change to a UAS AM's Responsibilities.

19. **Duty of Care.** UAS AMs have a personal Duty of Care for personnel under their control (those who, by virtue of their involvement, temporary or otherwise, in UAS activities, come within a UAS AM's AoR) and the wider public who may be affected. They are thus Accountable for the safe operation of UAS in their AoR and for ensuring that RtL is ALARP and Tolerable. The UAS AM governance model does not absolve individuals at any level of their legal Duty of Care Responsibilities under Common Law and the Health and Safety at Work Act (1974).

Regulation 1031(3)

Approval

1031(3) CFAOS (BU) Organizations **shall** be approved by the MAA.

Acceptable Means of Compliance 1031(3)

Approval

Application

20. To be considered for Approval under the CFAOS (BU) an organization²⁹ should:

- a. Demonstrate that Approval is in either:
 - (1) The MOD Interest¹⁰ or;
 - (2) The wider National interest³⁰.
- b. Have the endorsement of an appropriate Sponsor¹² at:
 - (1) 1* level or above for Approvals in the MOD Interest.
 - (2) 2* level or above for Approvals in the wider National interest.

21. Applications for CFAOS (BU) Approval **should** be:

- a. Made using an MAA CFAOS (BU) Form 2³¹.
- b. Supported by a CFAOS (BU) CFOE, a CFAOS (BU) Operations Manual and any other applicable documents.

Application

22. CFAOS (BU) organizations **should** ensure that CFAOS (BU) Approvals remain valid subject to:

- a. The organization remaining in compliance with the relevant Regulations.
- b. The MAA being granted access to the organization to determine compliance with the relevant Regulations.
- c. The Approval Certificate not being surrendered, suspended or revoked.
- d. Continued endorsement of MOD Interest and / or National interest.

23. Following award of CFAOS (BU) Approval the UAS AM **should** notify the MAA of any factors likely to affect or influence the extant Approval. Furthermore, the UAS AM **should**:

- a. Formally apply for any uplifts or significant changes / variations to the Approval.

²⁹ See paragraph 9 for organizations already holding a CFAOS Approval iaw RA 1028 – Contractor Flying Approved Organization Scheme.

³⁰ Operating in the wider National interest is categorized as Special Case Flying; refer to RA 1160 – The Defence Environment Operating Framework; refer to RA 1163 – Air Safety Governance Arrangements for Special Case Flying Air Systems.

³¹ The MAA CFAOS (BU) Form 2 can be found on the MAA Website <https://www.gov.uk/government/collections/military-aviation-authority-approvals>.

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- b. Only implement any uplifts or significant change / variation to the Approval on receipt of an appropriately amended CFAOS (BU) Approval Certificate.
- c. Notify and reductions at the earliest opportunity.
- d. Formally apply³² for any uplifts or significant changes / variations to the Approval³³.
- e. Only implement any uplifts or significant change / variation to the Approval on receipt of an appropriately amended CFAOS (BU) Approval Certificate.
- f. Notify any reductions³⁴ at the earliest opportunity.

CFOE (BU)

- 24. The UAS AM **should** ensure that the CFOE (BU) is:
 - a. Current and up-to-date.
 - b. Under the Accountability and signature of the UAS AM.
 - c. Provided to the MAA in electronic copy.
- 25. The UAS AM **should** ensure that the CFOE (BU) iaw the MAA template³⁵ and as a minimum contain the following³⁶:
 - a. The official name and business name, address and mailing address of the organization.
 - b. A statement signed by the UAS AM confirming that the CFOE (BU) and any referenced documents:
 - (1) Are accurate and true.
 - (2) Define the organization's compliance with the relevant Regulations³⁷ and will be complied with at all times.
 - c. A statement describing the CFOE (BU) amendment process (to include a procedure describing how Minor Changes not requiring prior MAA endorsement will be managed and notified to the MAA³⁸).
 - d. The name of the UAS AM.
 - e. The name of the UAS FOPH (for UAS operated in the Open A2, Open A3 and Specific S1 sub-categories²⁴).
 - f. The position / role and name of the Sponsor.
 - g. Detail of how the activity is in the MOD Interest and / or the justification for Special Case Flying³⁰.
 - h. A description of the CFAOS (BU) organization including:
 - (1) Organizational Structure.
 - (2) Types / marks of UAS operated.
 - (3) UAS Categories and Physical Attributes⁵.
 - (4) Numbers of UAS operated.
 - (5) Operating locations.

³² For uplift the documentation required will be analogous to that required to support the initial application and will, as a minimum, include both a revised MAA CFAOS (BU) Form 2 and CFOE (BU).

³³ Such as: change of UAS Category, change or addition of a UAS type / mark (see also paragraph 42). The MAA CFAOS Branch may be consulted where doubt exists as to whether a change demands formal application or otherwise.

³⁴ Such as removal of the requirement to operate under a particular UAS Category, removal of UAS type; the MAA CFAOS Branch may be consulted where doubt exists as to whether a change is a reduction or otherwise.

³⁵ The CFOE (BU) template can be found on the MAA website <https://www.gov.uk/government/collections/military-aviation-authority-approvals>.

³⁶ This list is not exhaustive; the UAS AM may add to the list as they see fit.

³⁷ See also paragraph 5.

³⁸ Such as grammatical and typographical errors where the meaning of the wording remains unchanged (where doubt exists the MAA CFAOS Branch may be consulted as to whether a change requires prior MAA Approval or otherwise).

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- (6) Expected flying rate.
- (7) Numbers of RPs and other workforce resource associated with the task.
- i. A list of which RAs are deemed applicable³⁷.
- j. Details of any experience in flying operations or any wider aspects relevant to the activity such as training and T&E.
- k. A list of Contracted and Subcontracted organizations if applicable.

CFAOS (BU) Operations Manual

26. The UAS AM **should** ensure that the CFAOS (BU) Operations Manual is:
- a. Current and up-to-date.
 - b. Under the Accountability and signature of the UAS AM.
 - c. Provided to the MAA in electronic copy.
27. The UAS AM **should** ensure that the CFAOS (BU) Operations Manual iaw the MAA template³⁹ and as a minimum contain the following³⁶:
- a. A series of Orders / Instructions that details how the organization will comply in practice with all relevant RAs³⁷.
 - b. A statement confirming that the CFAOS (BU) Operations Manual:
 - (1) Has been approved by the UAS AM.
 - (2) That the Orders / Instructions will be complied with at all times.
 - c. A clear and unambiguous directive that all relevant personnel (such as the UAS FOPH and RPs) **should** comply with the Orders / Instructions.
 - d. A process to record that all relevant personnel have read the CFAOS (BU) Operations Manual and that they understand and comprehend the Orders / Instructions contained within.
 - e. A statement describing the CFAOS (BU) Operations Manual amendment process (to include a procedure describing how Minor Changes not requiring prior MAA endorsement will be managed and notified to the MAA³⁸).

Registration

28. The UAS AM **should** ensure that:
- a. UA operating under the CFAOS (BU) are registered on and, when no longer required, de-registered from the UK MAR⁴⁰.
 - b. Registration markings are appropriately displayed on UA according to UA size and type²⁰.

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Approval

29. Under the CFAOS (BU), for Open Category and Specific S1 sub-category UAS that are not already registered, application for UK military registration is automatic through submission of the CFAOS (BU) application, along with the CofU for Civilian-Owned UAS, to the MAR Registrar²², (there is no requirement to submit a separate application⁴¹).
30. The Sponsor / MAA may endorse / approve some CFAOS (BU) organizations, for T&E / Development, to operate UAS within a more permissive framework that is platform agnostic. Such organizations would be approved to self-categorize / re-categorize UAS and to independently modify and / or add UAS types / marks via the governance and methodology of the organization's T&E processes.
- a. In such cases:

³⁹ The CFAOS (BU) Operations Manual template can be found on the MAA website <https://www.gov.uk/government/collections/military-aviation-authority-approvals>.

⁴⁰ For de-registration refer to RA 1161 – Military Registration of Aircraft Operating within the Defence Air Environment.

⁴¹ See also RA 1031(2): Uncrewed Air Systems Accountable Manager.

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- (1) RA 2370¹¹ will be applicable; ie the organization must comply with RA 2370 and the UAS AM be endorsed to manage / conduct T&E iaw RA 2370.
 - (2) The CFAOS (BU) Approval will be conditions-based, within set pre-defined operating environments and limitations:
 - (a) For operation of UAS in the Open Category and / or Specific S1 sub-category and;
 - (b) Aligned to the RA 2370 T&E Categories.
 - (3) Approval will require the CFAOS (BU) organization to consider and define Airworthiness standards, Maintenance and Modification methodology within its operating framework and T&E processes.
 - (4) Approval will be clearly articulated in the CFOE (BU) and the CFAOS (BU) Approval Certificate.
 - (5) Appropriate T&E processes that describe the methodology for self-categorization / re-categorization and Modification / addition of UAS types / marks, will be detailed in the CFAOS (BU) Operations Manual.
 - (6) UAS AMs will be required to:
 - (a) Ensure the Sponsor has endorsed all UAS categorizations / re-categorizations and / or additions of UAS types / marks via an updated MAA CFAOS (BU) Form 2.
 - (b) Notify the MAA CFAOS Branch of all UAS categorizations / re-categorizations and any Modifications and / or additions of UAS types / marks, and provide detail of the intended activity.
 - (c) Apply for the registration of additional UA^{22, 42}, by modification of the MAA CFAOS (BU) Form 2 and associated documentation, or confirm that registration is already in place.
 - (d) Ensure that the Sponsor has issued a CofU¹² for all Civilian-Owned UAS.
- b. There may be rationale for a hybrid Approval in that the approved activity is split between non-T&E activity and T&E activities⁴³; ie where:
- (1) Part of the Approval is stipulated to particular types / marks of UAS in precise MAA endorsed UAS categories (eg for training and currency) as non-T&E activity.
 - (2) Part of the Approval permits self / re-categorization and Modification / addition of UAS types / marks as T&E activity (as per the framework described at paragraph 30.a).

31. The CFAOS (BU) Operations Manual will define Airworthiness standards and Maintenance processes.

32. Organizations seeking new CFAOS (BU) Approvals will be aware that the timeline from application to Approval typically takes about 3 to 6 months⁴⁴, and could be significantly longer depending on the complexity (eg T&E) or permanence of Approval sought (ie whether the requirement will be enduring). Early dialogue with the MAA CFAOS Branch is encouraged. Organizations may initiate informal engagement with a view to understanding the route to CFAOS (BU) Approval, the regulatory requirement, and wider challenges related to both the CFAOS (BU) and regulatory compliance. However, organizations will note that informal engagement will be limited and without commitment until formal engagement is authorized via endorsement by an appropriate Sponsor (ie by MAA CFAOS (BU) Form 2).

33. When it is considered that there is a case for an organization to be included in the CFAOS (BU) a detailed appraisal will be carried out by the MAA. The appraisal will seek to establish confidence in the organization, and the UAS AM, relevant to the

⁴² For the registration of additional UA, application for MAR registration is automatic via the notification.

⁴³ ie between Civilian Operated (In-Service) and Civilian Operated (Development) iaw RA 1160.

⁴⁴ From receipt of MAA CFAOS (BU) Form 2, and also dependent on the quality of the supporting document submission.

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operations concerned. The organization will be Audited via documentary and on-site inspections.

34. For the avoidance of doubt, the application for and subsequent issue of CFAOS (BU) Approval is accepted as addressing any requirements (perceived or otherwise) for a Military Permit To Fly, an Air System Safety Case, and UK Military Aircraft Registration.

CFAOS (BU) Approval Certificate

35. When evidence presented by the organization demonstrates that it satisfies the MAA requirements, a CFAOS (BU) Approval Certificate will be issued listing:

- a. A unique identifying reference.
- b. The approved organization, including the operating and trading name if different.
- c. The organization's principal place-of-business address.
- d. Name and details of the UAS AM.
- e. UAS types / marks for which operation is approved or whether the organization is endorsed for T&E / Development and the independent Modification / addition of UAS types / marks via self-categorization / re-categorization.
- f. UAS Categories and Physical Attributes⁴⁵ for which operation is approved or whether the organization is endorsed for self-categorization / re-categorization.
- g. Any applicable limitations.
- h. Any T&E Endorsement.
- i. The issue date (and date of expiry / revision if required).
- j. The title, name and signature of the MAA approving officer.

36. A CFAOS (BU) Approval Certificate will remain valid subject to:

- a. The organization remaining in compliance with the applicable Regulations.
- b. The MAA being granted access to the organization to determine continued compliance.
- c. The Approval Certificate not being surrendered, suspended or revoked.
- d. Continued endorsement by the MOD Sponsor(s).

37. The MAA will withdraw from the CFAOS (BU) any organization that no longer meets the requirements.

38. A list of organizations who have been granted Approval under the CFAOS (BU) will be published by the MAA⁴⁵. If, eg for specific security reasons, publication would be undesirable for an organization, the MAA CFAOS branch will need to be made aware prior to completion of the Approval process.

Compliance

39. CFAOS (BU) organizations will be subject to compliance Assurance activities conducted by or on behalf of the MAA. Access may be required to personnel, facilities, UAS, documents, records, data, procedures and any other materials relevant to compliance.

40. Costs for periodic compliance Assurance activities conducted by or on behalf of MAA will not be recoverable from the MAA.

Approval Changes

41. As a minimum, the MAA need to be notified of changes to:

⁴⁵ <https://www.gov.uk/government/collections/military-aviation-authority-approvals>.

Guidance Material 1031(3)

- a. The UAS AM.
- b. The UAS FOPH²⁴.
- c. The MOD Sponsor(s).
- d. Detail regarding how the activity is in the MOD Interest.
- e. Types / marks of UAS operated.
- f. UAS Categories and / or Physical Attributes⁵.
- g. Ownership of the organization.
- h. The organization's official name, business name, address and / or mailing address.

42. Application to the MAA for a CFAOS (BU) Approval amendment will not constitute Approval to operate to the proposed amendment.

43. Following receipt of an application for uplift or significant change the MAA will determine continuing regulatory compliance and will amend, if necessary, the CFAOS (BU) Approval Certificate.

44. The CFOE (BU) is the document that details the scope of activity deemed to constitute CFAOS (BU) Approval.

45. The CFAOS (BU) Operations Manual is the document that details how the organization intends to comply with the applicable Regulations.

Regulation 1031(4)

Sponsor

1031(4) All CFAOS (BU) Organizations **shall** have a Sponsor.

Acceptable Means of Compliance 1031(4)

Sponsor

46. The Sponsor **should**:

- a. Be a Crown Servant at 1* level or above for Approvals in the MOD Interest.
- b. Be a Crown Servant at 2* level or above for Approvals in the wider National interest (ie Special Case Flying).
- c. Have appropriate Competence and experience that enables them to discharge the requirements of this Regulation⁴⁶.
- d. Hold ToR that empower them to act as such as a Sponsor, and which detail their Sponsor Responsibilities.

Governance

47. The Sponsor **should**:

- a. Prior to Approval:
 - (1) Confirm that the MAA CFAOS (BU) Form 2 application is appropriate to the scope of activity.
 - (2) A suitable UAS AM is in place.
 - (3) Appropriate Safety arrangements are in place for UAS to be operated under the CFAOS (BU).
 - (4) Endorse the MAA CFAOS (BU) Form 2.
- b. Post MAA Approval confirm that:
 - (1) The organization has a CFAOS (BU) Approval appropriate to the scope of activity.

⁴⁶ 2* Sponsors for CFAOS (BU) Approvals in the wider National interest (ie for Special Case Flying) **should** also hold an appropriate Letter of Delegation (detailing the Sponsor activities) from the relevant service Chief of Staff or Defence Equipment and Support Chief Executive Officer.

**Acceptable
Means of
Compliance
1031(4)**

(2) A UAS AM, endorsed by the MAA, is in place, supported by a UAS FOPH^{23, 24}.

(3) Appropriate ongoing Safety arrangements remain in place for UAS operated under the CFAOS (BU).

c. On an ongoing and enduring basis assure themselves that:

(1) The organization is operating within the scope of its CFAOS (BU) Approval⁴⁷.

(2) The organization is operating in compliance with the Regulations as listed in the CFOE (BU)⁴.

Registration

48. The Sponsor **should** issue a CofU⁴⁸ for any Civilian-Owned UAS.

**Guidance
Material
1031(4)****Sponsor**

49. Through the MAA CFAOS (BU) Form 2, Sponsors are endorsing (thereby supporting in full) the application for an organization to hold a CFAOS (BU) Approval to conduct the activities detailed within the Form 2, using UK military registered UA, and that the activities are in either the MOD Interest or wider National interest. This includes the initial Form 2 and any subsequent amendments.

50. A new MAA CFAOS (BU) Form 2 needs to be submitted following any change or replacement of the individual holding the Sponsor post / appointment⁴.

51. The Sponsor will ensure appropriate indemnity arrangements are in place⁴⁹.

⁴⁷ Note this is an enduring requirement.

⁴⁸ Refer to RA 1160(3): Certificate of Usage.

⁴⁹ Advice may be sought from MOD Central Legal Services.