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MAA/RN/2025/06 – Aerodrome Infrastructure Compliance and Early Engagement Requirements

References:

A. RA 3500 Series

Issue

1. Following completion of a number of major Aerodrome infrastructure projects across the MOD aviation estate, Aerodrome Operators have identified continuing RA 3500 series non-compliances. These non-compliances, of which some may have been cost-driven trade-offs, pose Risks to Air Safety, regulatory credibility, and operational resilience. There have been some misconceptions regarding the applicability of pre-existing 'grandfather rights'; delayed engagement with the Military Aviation Authority (MAA) has compounded these issues and reduced the ability to identify timely pathways to compliancy.

Scope

2. This Regulatory Notice applies to all organisations within the Regulated Community (RC), both Duty Holding and Duty Holder-Facing, involved in planning, tendering, and delivering Aerodrome infrastructure works under the MAA Regulatory Publications (MRP). It clarifies the regulatory position on compliance obligations, dispels misconceptions about grandfather rights and mandates early engagement with the MAA for all infrastructure projects impacting Aerodrome Safety and compliancy.

Implementation

3. Effective immediately:
- **Early Engagement:** Project teams must engage with the MAA at the concept and tender stages of any Aerodrome infrastructure project to ensure any non-compliance issues are identified and mitigated.
 - **Compliance Assurance:** All works must demonstrate compliancy with applicable MRP requirements. Enduring non-compliance is not permissible without first securing an MAA approved Alternative Acceptable Means of Compliance, Waiver, or Exemption (AWE)¹.
 - **Legacy Compliance Provisions:** It should not be assumed that legacy AWEs, to overcome historic non-compliance, will automatically be transferred to any form of Aerodrome work, including new construction, Modification, restoration, rehabilitation,

¹ Refer to MAA03: Military Aviation Authority Regulatory Processes – Annex B.



refurbishment, or similar activities at MOD MRP regulated Aerodromes. The RA 3500(1) lexicon describes the compliance obligations.

- **Governance Review:** The MAA is reviewing the Defence Infrastructure Organisation's aviation specific tendering and Assurance processes to address potential systemic issues in compliance decision-making such that significant Aerodrome infrastructure works should aim for compliancy as default.

Background

4. Recent refurbishment projects have highlighted:
 - Cost vs Compliance Trade-offs: Decisions to elect non-compliant solutions (eg lighting, signage, gradients) due to financial constraints.
 - Scope Deviation: Ambiguity in tender documentation and lack of formal Risk Assessment for de-scoping compliance measures.
 - Safety Risks: Operational concerns including pooling on Runways, inadequate lighting, and approach path indicators.
 - Civil Use Implications: Enduring non-compliances may affect Aerodrome notification for civil use under Article 210 of the Air Navigation Order.
 - Route to Green: Waiver requests lack credible plans for achieving compliance within proposed timeframes.

Summary

5. All Aerodrome infrastructure projects shall:
 - Engage with the MAA early in the planning process.
 - Aim for compliance, but where that is not possible, secure MAA approved AWEs prior to work commencing at an MOD Aerodrome.
 - Recognise that legacy compliance provisions do not apply to new construction, Modification and restoration (or activity described in the same lexicon) of facilities at MOD MRP regulated Aerodromes.
 - Failure to comply may result in regulatory enforcement action and review of Aerodrome civil use status.
 - Highlight the impact of non-compliancy to other Duty Holders to ensure the accumulative impact pan-MOD is understood beyond the platforms based at that Aerodrome, including consideration of down-declaring operating surfaces for platforms outside the military Duty Holder Risk acceptance mechanisms (eg civilian operators).

Queries



Defence
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Military Aviation Authority (MAA)

Regulatory Notice



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