



3 June 2026

MAA/RI/2026/09 – Replacement of the Letter of Endorsed Categorisation model with an Operator Identification scheme for Open and Specific S1 Uncrewed Air Systems

References:

- A. RA 1600 – Uncrewed Air Systems Categorization
- B. RA 1601 – Uncrewed Air Systems Open A1 sub-category (Fly 'Over' People)
- C. RA 1602 – Uncrewed Air Systems Open A2 sub-category (Fly 'Close To' People)
- D. RA 1603 – Uncrewed Air Systems Open A3 sub-category (Fly 'Far From' People)
- E. RA 1604 – Uncrewed Air Systems Specific S1 sub-category
- F. RA 1031 – Contractor Flying Approved Organization Scheme (small Uncrewed Air Systems)
- G. RA 1161 – Military Registration of Aircraft Operating within the Defence Air Environment

Issue

1. This Regulatory Instruction (RI) implements immediate changes to the categorisation process for Uncrewed Air Systems (UAS) in the Open (A1, A2, A3) and Specific S1 sub-categories. It replaces the Letter of Endorsed Categorisation (LEC) model with an Operator Identification (Operator ID) scheme for these sub-categories. As part of this scheme, Open and Specific S1 UAS will no longer be registered on the UK Military Aircraft Register (MAR); instead, they will be identified through the issued Operator ID, which must be displayed on each Air System. This RI provides interim regulatory authority pending formal amendment of Reference A and G.

Scope

- 2. This RI applies to units seeking categorisation in Open (A1, A2, A3) and Specific S1 sub-categories under RA 1600. No changes are made to Specific S2 sub-category or Certified category; their process remains unchanged.
- 3. For Contractor Flying Approved Organisation Scheme (small Uncrewed Air Systems)(CFAOS (sUAS)) units, the Operator ID scheme will apply, and Open and S1 Category UAS will no longer be registered on the UK MAR. The approval process remains otherwise unchanged, and applicants should contact the CFAOS branch for further guidance on their application. While individual sUAS will not appear on the UK MAR, applications will continue to need robust justification as to why Civil Aviation Authority (CAA) Regulation is not appropriate prior to MAA Approval and entry into the Defence Aviation Environment (DAE). RA 1160 provides further guidance.

Aim

4. This RI applies exclusively to the Open (A1, A2, A3) and Specific S1 sub-categories and introduces an Operator ID scheme, formalises 2nd Party Assurance (2PA) for military units, and removes UKMAR requirements for operations conducted under an approved Operator ID.



Implementation

5. Effective 2nd June 2026: All new categorisation submissions for Open Category and Specific S1 sub-category are to be made under the Operator ID scheme.
6. Transitional arrangements apply as detailed at Paragraphs 8–10.

Background / Introduction

7. The LEC model is no longer scalable or efficient for Open and Specific S1 sub-categories, due to the rapid proliferation of small UAS across UK Defence. The Operator ID scheme introduces a unit-centric, Risk-based, and scalable approach, enabling proportionate scrutiny by both the MAA and 2PA organisations. This model empowers UAS Responsible Officers (ROs) / UAS Accountable Managers (AMs) as the central enabler for safe and compliant operations, regardless of unit experience level, removes UK MAR requirements, simplifies regulatory compliance, and supports operational flexibility. The scheme is intended to enable safe exploitation across both traditional and non-traditional operating contexts (including maritime, dispersed land, and dynamic environments), with Assurance adapted proportionately by 2PA to reflect these conditions. The Operator ID scheme complements existing aviation, maritime, and Defence Safety control systems and does not replace or duplicate established control or Assurance arrangements.

Transitional Arrangements

8. Existing LECs remain valid until expiry or 30 April 2028, whichever occurs first. Minor administrative changes may continue to be managed under an existing LEC.
9. Major changes to a valid LEC (including sub-category changes, new Special Purpose Clearance (SPCs), Waivers, or Exemptions) will normally require transition to Operator ID. Where this is not practicable, the existing LEC change processes may be authorised on a case-by-case basis to support managed transition, including where 2PA arrangements are not yet established.
10. Where an urgent operational requirement necessitates introduction of capability prior to meeting Operator ID prerequisites (including 2PA involvement), approval is to be sought via a Waiver in accordance with (iaw) extant MAA processes; such applications shall justify urgency and demonstrate Risks are As Low As Reasonably Practicable (ALARP) and Tolerable, with interim oversight arrangements identified where required.

Introduction to Operator ID scheme

11. Operator ID is a unique identifier issued to approved units and organisations. Military applicants are to nominate a suitably senior (minimum OF-4) and empowered RO Accountable for all activities conducted under the Operator ID. The RO / UAS AM is responsible for ensuring compliance, governance, and effective oversight of operations.
12. UAS ROs must complete the MAA UAS RO course and be fully conversant with their Responsibilities under RAs 1600–1604. UAS AMs should complete the CFAOS UAS AM Briefing Day as described in RA 1031.
13. Operator ID records all relevant unit data, approved categories, SPCs, Exemptions, Waivers, and Alternative Acceptable Means of Compliance (AAMC). Only the UAS RO / UAS AM can submit change requests for their own Operator IDs.
14. Operator ID is platform-agnostic: any compliant UAS may be operated within the approved category (eg, 'up to Open A3' allows any platform with correct conformity markings up to 25 kg iaw RA 1600–1603). The UAS RO / UAS AM is Accountable for ensuring platforms do not pose security or integrity Risks, especially when sourced or produced overseas, and that due diligence is conducted. For guidance on approved platforms, UAS RO should consult their 2PA organisation; the MAA does not endorse small UAS



platforms. UAS AMs should consult their Sponsor in the first instance to agree the scope of their approval via the MAA CFAOS (sUAS) Form 2, with further guidance given from the CFAOS Branch.

15. Operator ID identifiers must be clearly displayed on all platforms for traceability and Accountability.
16. Any breach of Operator ID authority without operational imperative, or concerns raised by 2PA or the MAA, may result in immediate suspension or revocation of the Operator ID, pending investigation. The UAS RO / UAS AM is personally responsible for all activities conducted under their unit Operator ID.

Removal of MAR requirement

17. UK MAR registration is no longer required for platforms in the Open and S1 sub-categories when operating under a valid Operator ID.
18. Platforms shall have conformity markings as described in the sub-category of intended operation (eg, RA 1604 requires C0–C4 conformity markings or for platforms to be 'built to similar standards' which would be equivalent to UK class marks UK0–UK4).
19. The next RA 1600 series update will include new base standard conformity markings, moving to UK class marks.
20. Platforms without conformity markings or that are not designed to similar standards require exemption or SPC from the MAA (eg, self-build or non- Commercial Off The Shelf).

Formalisation of 2nd Party Assurance (2PA)

21. For military operators, 2PA is formally embedded within the Operator ID approval, and oversight framework for operations conducted in the Open and Specific S1 sub-categories. UAS ROs / UAS AMs remain fully Accountable for compliance and Risk within the scope of their approved Operator ID.
22. Up to Open A3 sub-category: The MAA may approve operations in 'up to Open A3' without prior 2PA endorsement; the relevant 2PA organisation is notified and incorporates the unit within routine Assurance activity. For Open Category (A1–A3) activity, Assurance is to be proportionate to Risk and is expected to be predominantly routine and retrospective, with depth of oversight scaled according to activity complexity and exposure.
23. Specific S1 sub-category: 2PA endorsement is required prior to MAA approval.
24. SPCs, Exemptions, and Elevated-Risk Activities: 2PA endorsement is required before MAA review.
25. Ongoing Assurance: 2PA conducts routine oversight and compliance checks proportionate to authorised activity and Risk, escalating concerns to the MAA where required.
26. Annex A provides Minimum Expectations and Guidance for 2PA Organisations.

Applying for an Operator ID

27. For UAS ROs, all Operator ID, SPC, Waiver, Exemption, AAMC and administrative change requests must be submitted via the MAA intranet application, hosted on the MAA intranet homepage, which replaces previous email-based LEC processes. Civilian Operators will not have access to the application at initial roll out, therefore UAS AMs should continue to apply for all Operator ID, SPC, Waiver, Exemption, AAMC and administrative change requests via email to the CFAOS desk officer.
28. The Categorisation Safety Checklist (RA 1600 Annex B) and SPC Checklist (RA 1600 Annex B – Appendix 2) should continue to be used for S1 and SPC applications.
29. For platforms that meet categorisation conformity requirements (eg UK / EU-marked C0–C4 platforms operated under Specific S1 Operator ID), RA 1600 Annex B – Appendix 1 is not required to be submitted to the MAA when adding platforms under an approved Operator ID; however, the elements within Annex B



are expected to be reflected in unit orders and governance arrangements. These will be assessed during Assurance to demonstrate platform suitability and continued compliance. Annex B – Appendix 1 may be used as guidance to inform internal assessment where a unit intends to seek MAA approval via an Exemption or SPC to operate a non-conforming platform, while CFAOS(sUAS) organisations will continue to add platforms via Sponsor-endorsed MAA CFAOS (sUAS) Form 2 approval within the CFAOS(sUAS) Exposition prior to use. Where any doubt exists regarding a platform's suitability, the UAS RO shall consult their 2PA organisation or the MAA prior to operation, and UAS AM should consult the CFAOS Branch.

30. For 'up to Open A3 sub-category' (inclusive of A1, A2 and A3) applications: UAS RO applies → declares understanding of RAs and qualifications → MAA approves operations in 'up to Open A3' → 2PA organisation will be notified. UAS AM should apply via email to CFAOS desk officer.

31. For 'up to Specific S1 sub-category': UAS RO applies on app with supporting evidence uploaded (RA 1600 Annex B, for example) → 2PA endorsement is required before MAA approval → MAA then issues the Operator ID. UAS AM applies via email to CFAOS desk officer, providing the supporting evidence required in RA 1031.

32. For SPCs / Other: UAS RO application with supporting evidence → 2PA endorsement → MAA reviews before adding to Operator ID. UAS AM should apply via their CFAOS desk officer.

Queries

Any observations or requests for further guidance on the content of this RI should be submitted by email to DSA-MAA-MRPEnquiries@mod.gov.uk

MAA Head Operating Assurance



Annex A

Minimum Expectations and Guidance for 2PA Organisations

1. Purpose

1.1. This Annex defines the minimum expected activity for 2PA organisations when providing endorsement of Operator ID applications in the Specific S1 sub-category, elevated-Risk requests (eg SPCs, Waivers, Exemptions) and when conducting ongoing Assurance of units operating under any Defence Operator ID (including “up to Open A3”).

1.2. The intent of this Annex is to provide a clear baseline for 2PA organisations to be effective.

1.3. Under Operator ID, the MAA adopts a 3rd Party Assurance (3PA) posture, sampling and checking the effectiveness of 2PA activity rather than duplicating 2PA.

2. Applicability

2.1. This Annex applies to 2PA organisations providing Assurance for military units seeking to operate under the Operator ID scheme in:

- Open Category (Up to Open A3).
- Specific S1 sub-category.
- SPCs, Exemptions, Waivers, AAMCs / other elevated-Risk activity added to an Operator ID.

2.2. This Annex describes what 2PA is expected to check as a minimum to assure unit compliance with RA 1600–1604 (as applicable), and any subordinate orders / requirements endorsed by 2PA.

3. Principles (How 2PA should approach Assurance)

3.1. Proportionate to Risk. Depth of review shall scale with Risk to Life (RtL), operational complexity, novelty, exposure, and environmental factors.

3.2. Evidence-based. Endorsement shall be based on review of documented evidence and a coherent Safety argument, consistent with RA 1600 Annex B expectations for Open / S1 Operator IDs.

3.3. Bounded approvals. Where satisfied, 2PA shall ensure endorsements are caveated, bounded, and limited appropriately (conditions, limitations, validity, competency constraints).

3.4. Escalation for novelty / contention. Novel, complex, or higher-Risk activity shall receive increased scrutiny and is to be escalated to the MAA where required. ROs should refer to RA 2370 if conducting deliberate testing, data gathering or evidence generation associated with the development of a new sUAS or changes to an existing sUAS.

3.5. Closed-loop action. 2PA shall conduct to-and-fro engagement with applicants to close gaps before endorsement; unresolved gaps shall be explicit and accompanied by a recommendation (approve with limits / do not endorse).



Part A – 2PA Endorsement Checklist

4. What requires 2PA endorsement before MAA action

4.1. 2PA endorsement is required prior to MAA approval / review for:

- Specific S1 Operator ID applications.
- SPCs, Exemptions, Waivers, AAMCs, and elevated-Risk activities added to an Operator ID.

4.2. For “up to Open A3” applications, the MAA may approve without prior 2PA endorsement; 2PA shall be notified and include the unit within routine Assurance activity (see Part B of this Annex).

5. 2PA Minimum Endorsement Review – Administrative

5.1. Checklist (minimum):

- Responsible Officer identified and request owned appropriately.
- Requested operating bounds clearly stated (category / sub-category sought, locations / airspace, maritime ops, Remote Pilot (RP) distances, heights, people separation, duration / validity, day / night, weather minima, communications requirements, etc).
- Eligibility against sub-category rules checked (eg Open Visual Line Of Sight (VLOS) / 120 m constraints; S1 Beyond Visual Line Of Sight (BVLOS) up to 2,000 m and segregated airspace; restrictions on overflight of areas of high population density).
- Platform conformity / design standard claim checked (eg UK / EU conformity marking or “designed to similar standards” where applicable) and whether non-conforming operation is being sought via SPC / exemption.
- Operator ID marking / traceability arrangements included in unit governance and orders.

6. 2PA Minimum Endorsement Review – RA 1600 Annex B aligned

6.1. 2PA should review submissions for completeness against the RA 1600 Annex B structure (Organisation / Operations / Systems) and verify that evidence supports the proposed operating bounds.

6.2. Organisation (People, governance, competence)

- Organisation structure and management for UAS activity described (roles, Responsibilities, supervision).
- Key personnel identified (UAS RO / UAS AM, RPs, instructors / examiners where used) and competence evidenced (qualifications, experience, currency).
- Flight team composition defined (including support roles such as observers / assistants where relevant).
- Limits on operation of multiple UAS types and / or multiple UAS under one RP defined where applicable (including any coordination / swarming constructs, if requested).
- Training programme described (initial, continuation, conversion, checking; independent assessment where applicable).
- Crew health / fitness policy included.
- Logs / records requirements defined (flights, defects, Maintenance actions, Incidents / occurrences).
- Occurrence reporting (ASIMS) and flight Safety programme described, including interface to unit Safety Management arrangements.



- Change management for Modifications described (how changes that could affect Safety are controlled).
- Repair / servicing process described.

6.3. Operations (Operating intent, environment, procedures)

- Operating intent / types of operation described (VLOS / BVLOS, dynamic tasking, day / night, weather minima, operating behaviours such as “follow-me”, etc).
- Operating areas described (population density considerations, launch / recovery suitability, congested areas, roads, permissions where required).
- Operating limitations / conditions captured (Maximum Take-Off Weight, max speed / energy where relevant, height limits, separation distances, airspace type).
- Aggravating / mitigating factors table included and coherent.
- Dangerous cargo arrangements addressed where applicable (what, how, procedures).
- Supervision arrangements described (how RP activity is overseen / controlled).
- Operating site planning and assessment includes airspace Hazards, restrictions, electromagnetic environment, local avoids.
- Communications plan described (internal crew comms and external coordination with other air users where needed).
- Weather considerations included (met source, limitations, go / no-go criteria).
- On-site procedures described (site survey, selection of operating / alternate areas, cordons, briefings, refuelling / batteries).
- Assembly / functional checks, pre-flight checks, flight procedures, and post-flight / between-flight checks documented.
- Emergency procedures documented (lost link, flyaway, airspace encroachment, fires, etc) including preventive measures / alarms / instructions.
- Surveillance / verification of geospatial positioning addressed where applicable.

6.4. Where technical / system evidence is required (eg non-standard platform), 2PA shall confirm the submission addresses RA 1600 Annex B Appendix 1 areas, including (non-exhaustive):

- Design / production information and standards used.
- Designed flight envelope, dimensions, mass, speed / energy.
- Software Assurance and Configuration Control.
- Command and Control (C2) link integrity, monitoring, and loss prevention.
- Lost link logic / profiles for all phases of flight.
- Whole system single points of failure and redundancy.
- Maintenance philosophy, lifting, inspections, repair / servicing.
- Conformity marking / “similar standards” justification.

7. 2PA Minimum Endorsement Review – Risk, Evidence, and ALARP / Tolerability

7.1. 2PA shall confirm the unit Risk Assessment:



- Identifies involved and uninvolved persons and exposure.
- Considers key Hazards (eg loss of control, lost link, flyaway, Controlled Flight Into Terrain, Human Factors, electromagnetic interference, battery fires).
- Identifies mitigations and residual Risk.
- Demonstrates Risks are reduced ALARP and Tolerable within the proposed bounds.

7.2. 2PA should test the logic of the Safety argument (coherence between claims, argument, and evidence) and confirm evidence is adequate for the Risk and novelty.

8. Elevated-Risk / Novel / Contentious Activity – Additional 2PA considerations

8.1. When a request includes any of the below, 2PA shall apply increased scrutiny and shall normally recommend additional limitations, evidence, and escalation to MAA as appropriate:

- SPCs (any derogation from baseline category constraints).
- BVLOS / Segregated Airspace constructs (Specific S1), including surveillance, communications, and lost link containment.
- Dropping of materiel / payload release, dangerous cargo, or hazardous payload carriage procedures.
- Swarming / multiple-UAS control constructs (team composition, RP workload, C2 resilience, failure modes, recovery).
- Autonomy features and procedures covering activity the RP is not directly controlling, including lost link profiles.
- First-Person View operations (observer arrangements and separation Assurance).
- Experimentation activity.

9. 2PA Endorsement Output (What 2PA shall provide to support MAA action)

9.1. When a 2PA organisation endorses a unit request, it is confirming that;

- The request is endorsed (S1 application / SPC / Waiver / Exemption / AAMC etc).
- Confirmation that the submission was reviewed against RA 1600.
- Key assumptions and evidence reviewed.
- Limitations / conditions (caveats) applied by 2PA.
- Recommended validity / renewal triggers and change triggers.
- Any issues requiring MAA awareness / escalation.

9.2. Endorsements shall be sufficiently detailed to justify the decision and to communicate conditions clearly; endorsements shall not rely on informal correspondence as the primary record.



Part B – Ongoing 2PA Assurance Expectations (Post-approval / In-Service)

10. Routine assurance (minimum)

10.1. 2PA shall incorporate Operator ID units into a proportionate Assurance plan, with frequency and depth determined by the effective 2PA and based on authorised activity, Risk, and observed performance.

10.2. As a minimum, ongoing Assurance shall check that:

- Unit activity remains within Operator ID bounds (category / sub-category and any SPC / Waiver / Exemption limitations).
- Local orders / procedures continue to reflect applicable RA 1600–1604 requirements for the unit's authorised activity.
- RP competency, currency, and supervision remain valid.
- Records / logs / occurrence reporting are functioning and appropriately used.
- Change management is effective (platform changes, software updates, Modifications, new payloads, new operating areas, etc).
- Emergency procedures (lost link / flyaway / fire) remain current and exercised as appropriate.
- Any conditions / limitations imposed by 2PA / MAA are complied with.
- Operator ID traceability arrangements remain implemented.

10.3. Assurance methods may include spot checks, in-person visits, virtual appointments, and Risk-based targeted Assurance activity, proportionate to authorised activity and resource.

11. Organisational Safety Management expectations (maturing model)

11.1. As the model matures, 2PA organisations (supported by TLBs as appropriate) should increasingly enable proportionate ownership / oversight of:

- Aviation Safety Management arrangements and plans (as applicable).
- Occurrence management and reporting arrangements.
- An open and honest Safety reporting culture.
- Oversight of unit orders including training and Human Factors considerations.
- Sharing of good practice and learning from experience.
- Proportionate surveillance activity (Risk-based Assurance).
- Acting as a conduit for enquiries, linking to MAA and relevant stakeholders as required.

12. Escalation, referral, and MAA engagement

12.1. 2PA shall escalate to the MAA where:

- Significant non-compliance is identified.
- An occurrence suggests systemic control failure or elevated RtL.
- Proposed activity is novel / contentious beyond 2PA competence / capacity.
- Assurance indicates the Operator ID should be suspended / limited pending investigation.

13. Records and auditability

13.1. 2PA shall retain, for a minimum of 12 months post-activity, the records underpinning the endorsed activity. This shall include what was checked, evidence reviewed, any limitations applied, and confirmation of closed follow-up actions. Records are to be made available to the MAA on request to support 3PA sampling and effectiveness checks.



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