IFIA member companies have received requests from clients to issue Release Certificates as referenced in EI/JIG STANDARD 1530 - Quality Assurance Requirements for the Manufacture, Storage and Distribution of Aviation Fuels to Airports. It is the position of IFIA that members are independent inspection companies and should not issue Release Certificates, for the following reasons:

- Under Section 2 AVIATION FUEL QUALITY ASSURANCE AND TRACEABILITY, subsection 2.2.5 Release Certificate (RC) it clearly states; “The RC is an operational document issued by the operator of the site handling / transferring the product....”

  As independent inspection companies do not operate terminals, refineries or pipelines they cannot be considered site operators.

- Subsection 8.4.5 Product Release, notes that the decision to release the product should be based on various factors including confirmation from those responsible for "production and/or storage and/or the transportation operation".

  As independent inspection companies normally only become involved at the point of custody transfer, they do not have knowledge of, or responsibility for, the production or storage of the product and do not have sufficient information to make the decision to release.

- The Release Certificate must be signed by the releasing authority.

  Independent inspection companies are neither the custodian of the fuel nor the releasing authority, and hence cannot issue Release Certificates.

The role of the independent inspector is typically quite separate from that of the site operator, as they do not have fiscal or operational control of the aviation fuel. The control of the fuel rests with the terminal operations staff, so it is they who have the signatory responsibility for the Release Certificate.
It is acknowledged that issuing Release Certificates can be complex. EI JIG 1530 (Annex B) offers examples, most of which involve situations where operational and analytical data are from different sources. In some cases, the responsibility for product quality and release in accordance with EI JIG 1530 may be shared between an independent inspection company and the site operator. IFIA’s position expressed in the foregoing does not preclude individual members from issuing a Release Certificate in cases where a clear and express contractual agreement with the relevant parties is in place for a specific situation.

**EI JIG 1530 vs DEFSTAN 91-091 issue 9**

It should be noted that EI JIG 1530 and DEFSTAN 91-091 issue 9 are not in alignment on this issue. While EI JIG 1530 does specify responsibility for the issue of the Release Certificate, DEFSTAN 91-091 issue 9 does not, which further strengthens the need to ensure that when data to complete a Release Certificate comes from different sources the specific responsibilities are both defined and formalised between the parties concerned.

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