

# CAA statutory charges 2017-18: Consultation on charges CAA response document

**CAP 1518**



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## Executive summary

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On 17 March 2017, we set out proposals for our Schemes of Charges due to come into effect from 1 April 2017. As a cost recovery body, not funded by the tax payer, the cost of our activities must be paid by those we regulate.

The key proposals under this consultation were:

- A general price increase of 1.5% across all Schemes of Charges in 2017/18.
- New specific charges to cover our costs in the following four areas where we are undertaking new activities:
  - **Airspace Change Process (ACP)** – a cost of £915,000 in 2017/18 for additional resource to undertake the new ACP process; this also includes a new online portal. This cost is to be recovered from NATS (En Route) plc (NERL) and airports;
  - **Unmanned Aircraft Systems (UAS)** – a cost of £500,000 in 2017/18 to cover the safety aspects of work mainly involving in the mitigation of mid-air collisions between drones and manned aircraft, plus improving the education of drone requirements to industry. The cost is to be recovered via the Air Operator Certification Scheme variable charges;
  - **Aviation Security** – a cost of £397,000 per annum to employ additional resource to deliver the Security Management Systems (SeMS) project and to meet regulated training requirements. The cost is to be recovered from airports (where departing passengers exceed 100,000 a year) under the existing monthly variable charge to aerodromes.
  - **Medical** – a cost of £124,000 per annum for the next two years, following our consultation on the future structure of our Medical Department. The cost is to be recovered via the Air Operator Certification Scheme variable charges.
- Review of the charging structure under the General Aviation Scheme of Charges concerning regulatory activities relating to the approval of unmanned aircraft systems (drones).

The consultation ended on 9 February 2017, by which time we had received 28 submissions. The main concerns have been highlighted under chapter 2 of this document with the responses to all the feedback received detailed in appendix A.

We are grateful for those submissions received and, after a CAA Board discussion, we propose to implement all proposals made subject to one amendment relating to the Air Travel Organisers' Licensing Scheme of Charges as explained under chapter 2, sections 2.12 and 2.13 below.

We remain committed to controlling our costs while investing in new processes, systems and skills in order to achieve further savings in the future. Our key objectives include: to provide the best possible outcome for consumers: be an efficient and effective organisation that meets the principles of Better Regulation; and to provide value for money in all our activities.

## Chapter 1

## Consultation submissions

1.1 A total number of 28 respondents provided submissions through the consultation exercise. The respondent type is broken down as follows:

<b>Submissions</b>	<b>No.</b>
Airports	6
Representative trade organisations	6
ATOL holders	2
Airlines	1
Authorised Medical Examiners	1
National Air Traffic Services	1
Other Organisations	8
Other Individuals	3
<b>Total</b>	<b>28</b>

1.2 The five representative trade organisations that responded were:

- Airport Operators Association (AOA) (2 submissions)
- Association of British Travel Agents (ABTA)
- General Aviation Alliance (GAA)
- Historic Aircraft Association (HAA)
- Large Model Association (LMA)

1.3 Chapter 2 of the document has focused on the main issues with all the submissions received from industry and our responses are detailed in appendix A.

## Chapter 2

# Our responses to the consultation submissions

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## Airspace Scheme of Charges

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### Funding of the Airspace Control Process (ACP)

#### Concerns as to the ability to recover additional CAA costs from airline users

- 2.1 NERL welcomed our proposals to invest additional resources in the airspace change process and the benefits of the new portal. However, it expressed concern about the proposed statutory charge because it did not have the ability to recover the additional costs from airline users. It argued that there was mixed support for our proposals on the new airspace change process for NERL to pay the proposed statutory charge and that non-statutory charging options had not been explored. It had, however, recently submitted an application to the FAS Facilitation Fund to cover NERL's share of the statutory charge and requested our support in that application. In the event that this application was unsuccessful, NERL would be forced to reprioritise other aspects of its airspace programme.
- 2.2 We consider that as the airspace change process is a statutory activity, and we are legally required to recover the costs of our regulatory activities, a statutory scheme of charges is the appropriate mechanism for recovering costs. We note that the new charge, which we intend to apply between April 2017 through to December 2019, is being split equally between UK airports and NERL, rather than being placed on a single entity. This reflects the diverse views about the best means of recovering our additional airspace change costs for RP2 and the necessity of recovering such costs. Decisions on the use of the FAS Facilitation Fund are a matter for the airlines rather than the CAA, so it would not be appropriate for us to comment on NERL's application.



### **Proposals for a revised charging mechanism**

- 2.3 The General Aviation Alliance proposed an alternative approach that would involve the incremental airspace costs being recovered through a charge related to the volume of controlled airspace managed by that airport, plus an additional charge applied when an airspace change proposal is submitted. A further approach could be to apply a discount to these charges depending on the number of aircraft movements using the airspace. GAA argued that by varying charges in accordance with volume of airspace and movements, there would be a stronger incentive for airports to more efficiently use and design controlled airspace. Further, as air traffic movements are more stable than passenger numbers, this would provide us with a more predictable income stream, and where workload increases because of additional airspace change proposals, income would rise to cover the costs.
- 2.4 We consider that an activity or usage based charge may have some merit. However, in this case, because the intended charge relates only to our incremental airspace change costs (the majority are already covered through UK en route charges) and because the new charge is intended to apply only for a finite period of time (2  $\frac{3}{4}$  years), a more complex scheme such as the one proposed by GAA would not be proportionate. In the event that the structure of such airspace costs is considered again in the future, we would consider such an option.

### **Request for confirmation that NERL and the airports would not receive preferential treatment due to paying the new charge**

- 2.5 As with all our statutory charges, those paying do not receive any preferential treatment in regulatory decisions and therefore we are content to provide such confirmation.

## Aviation Security Scheme of Charges

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### Funding of the SeMS regulation rollout

#### Concerns over the significant increase in the aerodrome variable charges

- 2.6 We undertook informal discussions with airport representatives about our planned increases in charges ahead of the formal publication of the consultation and also through the AOA's own Security Committee. Although any charge increases are unwelcome, the overwhelming message received during those discussions was that the proposed increases were reasonable in the circumstances and not unexpected.
- 2.7 Thanks to the collaborative approach we have built with the AOA over the last three years, we have driven forward considerable change in aviation security regulation. The majority of reviews have resulted either in the UK More Stringent Measures being withdrawn, simplified or clarified. From information received from airlines the changes implemented in the last 12 months, notably in respect of screening of unaccompanied hold bags, have delivered cost savings to industry amounting to tens of millions of pounds a year.
- 2.8 Therefore, taken in the round, whilst acknowledging concerns about the proposed charge increases, we provide good value for money. We are not complacent in our objective to contain costs and deliver ever greater efficiency but the proposed extra funding is to cover the important delivery of SeMS which was an activity that was not funded on transfer from the DfT in April 2014, and for which a DfT policy directive was passed to us in 2015 to implement the SeMS programme. Without this extra funding, the requirement to deliver the planned compliance activity in full would compromise the effective delivery of the SeMS programme rollout.

## Air Operator Certification Scheme of Charges and General Aviation Scheme of Charges

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### Funding of the unmanned aircraft system activities

#### Concerns were expressed regarding the increase in UAS permission and exemption charges and the additional cost to charge payers of £500k

2.9 One of our objectives is to maintain a safe UK airspace environment and protection for third parties through a proportionate regulatory regime with responsive guidance, permissions and exemptions. This will be delivered progressively and support the intent of the UK Government's emerging Drone Strategy. In order to achieve this objective, we have already set up a UAS Programme under its Emerging Technologies Steering Board.

2.10 The ongoing UAS Programme of work was defined in the context of the DfT led cross-government Drones Strategy. However, we anticipate initiatives arising from the DfT public consultation, 'Consultation on the Safe Use of Drones in the UK' (which closes on 21 March 2017), and this may influence the scope of requirements and our deliverables during 2017/18.

2.11 The 2017/18 programme has been aligned into three priority areas:

#### 1) **Safety**

This is in relation to the proposal for the additional funding of £500k for 2017/18 to be recovered from the larger airlines via the variable charge under the Air Operator Certification Scheme. The following four key elements will be covered:

- Better articulating and responding to risks in relation to aviation and the general public as a result of drone activity;
- Driving an education and communications campaign to better inform drone pilots of their obligations and responsibilities;
- Identifying and developing a view on technical mitigations to mid-air collisions. The aim is to minimise future risks by using new technologies and influencing manufacturer standards; and

- Influencing the EASA Basic Regulation ([Regulation \(EC\) No 216/2008](#)) and so ensure the UK is best equipped to support the aviation industry.

These activities are part of our core-regulatory functions and therefore the cost is being funded via our Schemes of Charges and not via the UK Taxpayer.

## 2) **Effectiveness and efficiency improvements**

The following activities within this programme are proposed to be funded by the current mechanisms under the General Aviation Scheme charge proposals:

- Refining internal CAA safety decisions and approvals;
- Improving the internal CAA processing efficiency; and
- Refreshing our website and UAS regulations based on EASA positioning.

As stated in our Consultation Document ([CAP 1477](#)), the current charges under the General Aviation Scheme have been in this Scheme for many years and the mechanism and charge levels have been superseded by the marked increase in drone activities to a point where the current prices and structure do not recover the associated costs. As a result, the charging mechanism that relates to the UAS approval activities, including the charges for National Qualified Entities (NQEs), has been restructured. The revised charges now better reflect the average time taken to process these applications and thereby cover the associated increased costs to adequately resource these activities going forward.

## 3) **Department for Transport (DfT) – Driving the future agenda**

We will continue to be funded directly by the DfT to support the theme of ‘driving the future’ agenda. This agenda is informed by the Government Drones Strategy and the CAA elements of support include:

- Identifying emerging technologies and capabilities of Drone use under the Pathfinders Programme;
- Providing expert technical support to the DfT and government departments at international engagements promoting UK PLC business interests;
- Refining and improving the management of future airspace to successfully and safely integrate the drone fraternity into the professional aviation community; and
- Exploring and developing the possibilities of expanding 'Unmanned Traffic Management' capabilities for the future.

## **Air Travel Organisers' Licensing Scheme of Charges**

### **Existing ATOL holder accredited body accreditation – new or change a trust, trustee or trust account**

#### **The minimum charge of £508 seems quite high for a small change to an existing trust**

2.12 We expect that in the majority of cases only the standard charges will apply. However, we accept that there may be a change to an existing trust account as opposed to a new trust account and this should be reflected in the charges. Therefore the standard charge of £508 will apply to the set-up of a new trust account, with any excess hour costs incurred recovered at the rate of £173 per hour up to a maximum of £81,200. A new application charge of £125 will apply to change an existing trust with any excess hour costs incurred recovered at the rate of £173 per hour up to a maximum of £81,200.

2.13 There is no correlation between CAA charges and APC rates. Our policy for operating a trust account is not a substitute for meeting our financial criteria.

## Conclusion

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- 2.14 We would like to thank all 28 respondents for their comments to the charging proposals.
- 2.15 Having discussed the comments received, and due consideration having been given by the CAA Board to the points detailed above, we propose to implement the charges outlined in the consultation document for the period commencing 1 April 2017. However, this is subject to the following change as explained under section 2.6 above relating to the Air Travel Organisers' Licensing Scheme:
- The new charge of £508, plus any excess charges at £173 per hour up to a maximum of £81,200, was proposed to cover where an ATOL holder or Accredited Body applies to the CAA to i) put in place or ii) change a trust, trust account or trustee for the purpose of their ATOL and/or their Accredited Body accreditation. Whilst this charge is appropriate under i) above, the CAA Board agrees that in respect of ii) above, a reduced rate of £125, plus any excess charges at £173 per hour up to a maximum of £81,200, should apply..

## Appendix A

# Summary of submissions received from charge payers and interested parties

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## Air Operator Certification Scheme (AOC)

### **AOC1: The funding of this UAS work will benefit all overseas airlines but why only paid for by British airlines?**

#### **Ref 024, Ref 027**

Unmanned Aircraft Systems – where you propose to increase the variable AOC charge with the aim of recovering an extra £500,000 to enable you to work on airspace safety issues posed by unmanned drones.

- This safety related cost will benefit all airspace users, however, you propose to charge only UK commercial airlines. All overseas based airlines will benefit from the work that you will conduct, paid for by British airlines.
- The CAA has advised me that “At present this [AOC variable] charge recovers non-customer specific safety regulation activities including Research, Policy matters, Occurrences and MORs and attributable overheads etc.” and that “The activities to be covered by this [AOC variable] charge were agreed as part of the 2005 review, which included industry (including BATA), DfT and the CAA, and were re-confirmed in 2008. The charge is levied on those AOC operators which operate aircraft over 40 Tonne and is based on the number of Available Seat Kilometres Flown.
- To the extent it is possible to reconsider recovering your costs of these non-customer specific safety regulation activities to all users of the airspace, possibly via including them as part of the recovery that the CAA makes as part of the NATS en route unit rate I would ask you to consider this. This will not be possible in the short term, but I would welcome your comments on how we could move to such a structure in the future.

**CAA response**

See chapter 2, sections 2.9 to 2.11 in the main report.

This work is to determine a better understanding of the safety risk to commercial aircraft of the probability of a mid-air collision and the consequences of a drone hit, and what mitigations could be put in place on a proportionate basis. This work would then form part of the safety strategy for drones. As the stage of work is affecting the commercial aircraft sector, being the highest risk area, we consider that the AOC variable charge unit rate payable by the larger AOC holders would be the most relevant and appropriate source of funding.

## **Airspace Scheme (ASP) and En Route Air Traffic Control Services Regulation Scheme (ERR)**

### **ASP1: Funding of the Airspace Control Process (ACP)**

#### **Ref 018**

The General Aviation Alliance proposed an alternative approach to funding that would involve the incremental airspace costs being recovered through a charge related to the volume of controlled airspace managed by that airport plus an additional charge applied when an airspace change proposal was submitted.

#### **Ref 020**

NATS had concerns as to the ability to recover additional costs from airline users.

#### **Ref 022**

The Historic Aircraft Association (HAA) notes that new activities in support of the Airspace Change Process (ACP) are to be charged to airports and to NATS (En Route) plc (NERL), as the main beneficiaries of ACP. The HAA recommends that it is expressly stated that such funding does not imply that airports and NERL will enjoy any preferential consideration in ACP and that the reasonable demands of other airspace users will be given appropriate weight before any new controlled airspace, or TMZs, are approved.



**Ref 023**

The CAA is proposing a new charge to carry out its responsibility for regulating the airspace over the UK and as part of this requires changes to be made through its Airspace Change Process. The costs associated to this are proposed to be recovered equally from aerodrome licence holders and NATS (En Route) plc (NERL).

Heathrow welcomes the CAA's work to change airspace in the UK. Airspace change in the UK plays a critical role in the Government's long term efforts to reduce emissions, delays for passengers and to provide predictable noise respite for local communities.

**Ref 024**

Airspace Change Process – where you introduce/increase charges to NERL and airports with the aim of recovering £915,000 in 2017/18 (and rising to £925,000 in 2018/19) to cover the costs of a new web portal and extra staff to manage the airspace change decision-making process.

- We recognise that there will be a significant increase in your workload to manage the new airspace decision-making process.
- Airspace redesign is of fundamental importance to the airline, as the current design is failing the UK badly, specifically in the south-east and of particular concern to us at Heathrow and Gatwick.
- We would encourage you to ensure vigilance over your costs as you embark on this new work as you have displayed in reducing your operating costs over the past 5 years as part of your strategic plan.
- Whilst these charges are not currently proposed to be directly levied on airspace users it seems inevitable that they could be passed on by the airports and NERL to users. Although the CAA's "capping" of the rates that NERL and Heathrow are able to charge in the current regulatory periods (through economic regulation) prevents "pass through" of these costs, for the time being, British Airways would like to understand what your thoughts are about how any such costs will be treated in RP3 and H7.

**Ref 027**

The AOA is supportive of any proposal which may assist towards delivering the necessary development of UK airspace and we acknowledge the CAA will need additional staff to manage and run the new process, including developing a new, bespoke online portal.

While the AOA welcomes the development of a clear, stable balanced policy on the airspace change process, we again remind the CAA to carefully consider to the obligations being placed on change sponsors in terms of the increased time and cost required to bring about a successful airspace change process application.

**Ref 028**

London Luton Airport is supportive of the proposed charge increase that will assist in the airspace change process as long as the additional staff taken on as a result of the charge increase produces a reduction in the time taken to process submissions. With airports wanting to provide environmental benefits to both airlines and communities the current process is extremely cumbersome and drawn out for all parties.

This is an additional cost generated for airport operators on top of those incurred as a result of the proposed longer ACP process and I would caution the CAA's use of the statement below as not all airspace changes produce commercial benefits, some are driven by environmental benefits only.

“We believe that we should charge both airports and NERL for these costs as they are the primary sponsors of airspace change proposals and they will benefit commercially from the improvements through, for example, improved throughput and punctuality.”

**CAA response**

See chapter 2, sections 2.1 to 2.5 in the main report.

We confirm that the proposed new aerodrome variable charge will be 0.17 of one pence per work load unit i.e. £0.0017 per work load unit.

## Air Transport Licensing Scheme (ATL)

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### ATL1: Extension of the ADR Scheme to airports

#### Ref 017

Alternative Dispute Resolution (ADR) – ABTA supports the concept of ADR - we have operated our own scheme for over 40 years – and support the principle of it being extended to airports. We acknowledge that the CAA wishes to incentivise voluntary participation in certified ADR arrangements. However, we are very concerned that the CAA, which is both the EU National Enforcement Body and the competent authority for the approval of ADR entities, is itself providing a residual complaints handling service through PACT.

We would question the complaints based charge of £150 payable by the airport and would ask how this figure has been arrived at.

ABTA believes strongly that both parties involved in any ADR should pay for its cost. Charging a fee to consumers acts as a deterrent to frivolous or ill-prepared claims and also encourages efficiency in the resolution process. Consumers have an interest in keeping overall costs low. If no fees were payable by the consumer an even higher number of unsuccessful claims would be started and there would be an increase in frivolous and otherwise unmeritorious claims.

#### CAA response

The Department for Transport has endorsed the CAA to be both the competent authority and regulator for the approval of ADR entities and also as a provider of a residual complaint handling service through PACT. This will remain in force until such time that the full transfer of UK airlines and aerodromes to the ADR Scheme has taken place.

The proposed charge of £150 payable by the airport is the same charge as currently applied to airlines and set to ensure cost recovery is achieved..

## **Air Travel Organisers' Licensing Scheme (ATOL)**

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### **ATOL1: Typographical error concerning the quoted current charge for SBA renewal after the applicable date paid by Direct Debit**

#### **Ref 002**

Re increases in fees for SBA renewal after the applicable date. Fees for Direct Debit payment increase by 7.5%, compared to only 1.2% relating to fees for non-Direct Debit payments. We believe Direct Debit is the preferred payment method and this only penalises companies who pay by this method.

#### **CAA response**

We apologise for this typographical error on page 3 under Table 2 Line 3 column 4 of the ATOL Consultation Enclosure. Under Table 2 Line 3 Column 4 of the current ATOL Scheme of Charges, the existing figure is shown as £890 and not as £840 as shown in brackets within the ATOL Consultation Enclosure. The proposed increase to £903 for 2017/18 from £890 is therefore 1.5%.

### **ATOL2: The proposed charge to change a trust, trust account or trustee should be reduced**

#### **Ref 015**

We agree with the principle of charging ATOL holders to reflect work in setting up and amending trust accounts carried out by the CAA and ATTs. The minimum charge of £508 seems quite high for a small change to an existing trust (e.g. amending the ATOL holder signatories to the mandate). Perhaps the £508 could apply as a standard charge to set up a new trust but the hourly rate could apply to amendments to existing trusts?

The initial set up charge would be received more positively by trust holding ATOL holders if i) they were to receive a reduction in APC liability to reflect the reduced risk to the ATTF associated with trust forms of security; and ii) if trust accounts were a more readily recognised vehicle by which applicants could meet the ATOL financial criteria in the absence of them meeting the minimum share capital requirement.

**Ref 017**

Structural changes as outlined in the consultation document at page 28 (paragraphs i, ii and iii) and at Paragraphs 2.11, 2.12 and 2.13 of the enclosure.

On top of the basic charge for

- New or existing trust accounts, trusts or trustees
- Specified regulatory compliance visit to an existing ATOL holder
- Non-online ATOL application using CAA staff

the CAA proposes to increase/introduce additional charges of £173/hour as incurred by the CAA to a maximum of £81,200 for reviewing and assessing applications, compliance visits and for inputting application data.

ABTA does have some sympathy as there can be significant costs in undertaking due diligence for what is essentially a bespoke service. However, we believe that an average charge should cover the CAA's costs and there should not be excess charges. ABTA, as a regulator, charges £350.

**CAA response**

See chapter 2, sections 2.12 and 2.13 in the main report.

**Aviation Security Scheme (ASEC)****ASEC1: Funding to cover CAA costs of regulating SeMS and deferral to 2018****Ref 006, Ref 019, Ref 021, Ref 023, Ref 025, Ref 026, Ref 027, Ref 028**

It is cited that the legacy DfT policy (SeMS) was passed to the CAA AvSec for implementation in 2015. It remains that SeMS is a concept that airports have the choice of adopting and is therefore not mandated at this time. The published cost to the CAA is £397,000 for four FTE. It has also not been made clear how adopting SeMS will financially benefit the industry in the long term so the increased charges proposed appear unwarranted.

It is fully appreciated that costs and fees rise across the whole aviation industry including those of airport operators to third parties and the most important consideration is that budgets for 2017 have now been set and agreed and the increase from 4.9p to 5.3p is a cost that cannot be recouped in this financial year.

The industry would be more accepting if this increase may be deferred until 2018.

Our understanding is that the variable charge for aviation security payable from 1 April 2017, will increase from 4.9 pence to 5.3 pence per departing passenger.

We are greatly concerned at such a significant increase on last year's prices. The additional cost represents an 8.16 % increase on 2016 prices, which is far in excess of both current and forecast RPI rates for 2017.

This level of increase appears to be unwarranted and represents a disproportionality high cost increase for our airline customers who are already having to deal with substantial currency fluctuations. As such this cost increase per passenger will represent a further burden for airlines and air travellers.

In addition along with other UK Airports Southampton Airport determines its schedule of charges in the early autumn in preparation for the following year commencing 1st January. As such the Airport published its charges in the late autumn to enable its airlines to budget accordingly, and therefore the timing of this consultation, and proposed timetable for implementation in April is misaligned for any commercial organisation to both discuss and plan for effectively. The proposed implementation period is only weeks after the end of the consultation period. The CAA should therefore look to implement any consultation taking account of the commercial reality of its implications for airports and airlines alike.

Southampton Airport, therefore, would like the CAA to reconsider both the level of charge and the proposed lead in period for any changes to be implemented.

#### **Ref 024**

Aviation Security – where you propose to increase the current charges by 8.16% to recover an extra £397,000 that is required to fund the creation of 4 new posts to facilitate delivery of the Security Management Systems (SeMS).

- British Airways is generally supportive of the SeMS project. As such we have no specific comments on this proposal.

**CAA response**

See chapter 2, sections 2.6 to 2.8 in the main report.

## **En Route Air Traffic Control Services Regulation Scheme (ERR)**

### **ERR1: Request for greater transparency on the breakdown of the charge**

**Ref 020**

NATS requested greater transparency on how this charge was built up to fully understand what the charge represented and how it might be managed in the future.

**CAA response**

For most of 2015/16, we worked closely with NATS to consider, through a number of meetings and workshops held, the determination of greater visibility/granularity of our costs against each of the applicable NATS charges. In addition, consideration was given to the perceived value added by the CAA for each activity undertaken. The conclusion was that NATS wished for more, not less, regulatory activity to take place in some areas, and on the cost granularity issue, although our systems could not provide the level of cost granularity desired by NATS. As a one-off exercise, we manually compiled the data to the mutual satisfaction of NATS and the CAA. However, the time taken to provide this level of detail manually was excessive and therefore we could not commit to the continued provision of such detail going forward without system improvements which we had no plans to accommodate in the short term.

## General Aviation Scheme (GAS)

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### **GAS1: Consider reducing the charges for 1-3 display item events and splitting into two charge bands, 1 display item and 2-3 display items**

#### **Ref 001**

The increases last year have seriously damaged the UK airshow industry causing the cancellation of many shows along with the contraction of others. In particular the charge for 1 to 3 item shows has been particularly onerous for the smaller events where the doubling of the charge put them out of economic reach. My suggestion is to treat any display having a single item to be charged, say, £150 and those with 2 to 3 items to be charged, say, £250 with the repeat discount percentage reductions as before. If this were done then it would be essential to specify on the permission that the two items be separated in time. The present arrangement where one pilot assumes responsibility for the other(s) is ridiculous and impossible to implement. The single item permission to be granted to the pilot and the 2 - 3 items to the display organiser but copied to the individual pilots. The post event charges are iniquitous with no obvious benefit other than to increase the CAA income.

#### **CAA response**

Charges allow us to recover our costs, as required by statute, and is not about generating income. As was stated in [CAP 1388](#) – CAA Response Document on the consultation on air display charges for 2016/17, even with this level of charges we are not fully recovering our costs, with an under-recovery of £100k plus the post event charge being phased in over a three year period to 2018/19.

### **GAS2: No obvious safety benefit following increased DA charges**

#### **Ref 001**

The DA (Pilot Display Authorisation) charges have had an adverse effect on those aspiring to enter the airshow scene, increasing their costs with no obvious safety benefit.



**CAA response**

We are required by statute to recover our costs from those we regulate. We are still not fully recovering our costs in the area of air displays.

**GAS3: Why introduce model aircraft display charges now?****Ref 001**

I do appreciate your search for additional income streams however model aircraft displays have never needed any permission in the past and my knowledge extends back six decades. On the basis of safety, why now..??? The BMFA has competently exercised and published safety guidelines for such events as has the LMA in more recent years. The guidance in CAP403 seems perfectly sufficient. To my knowledge there has never been a case of a third party being harmed at a public display or damage to third party property. Is this really risk based regulation or just a money gleaner? Your proposals will have a detrimental effect on model displays for the public and could cause the cancellation of some.

**Ref 007**

On the subject of Exemption charges we do feel that, quite rightly, we should be paying towards the cost of this work and the charge for public shows is most reasonable. However we do have some concern about the proposed value of the charge for model exemptions and feel that £30 would be a more reasonable figure considering that members have not been charged for this in the past and £57 is rather a big hit in one go. The £30 could be reviewed on an annual basis of course.

**CAA response**

We are required under the ANO to issue permissions for model aircraft when they exceed 400 feet altitude. This charge is to allow us to recover our costs for the work we carry out in issuing permissions for such model aircraft displays. This is not a change to current practice and reflects the requirement under statute to recover our costs.

**CAA response (continued)**

**CAA response (continued)**

Whist recognising that the charge for the permission to fly a model aircraft greater than 20kg ZFW is significant, we believe this is a fair reflection of the costs to deliver this exemption, particularly given that it has a validity period of three years.

**GAS4: Policy change so that each pilot or team requires a separate permission under SERA 5005(f)(2) – the 500 foot rule does not have a safety benefit****Ref 001**

I recognise that the increases here are minor and not worthy of comment other than the case of a site needing a long term permission under SERA.5005(f)(2) - the 500 foot rule. This for the purpose of display practice or evaluation. The policy used to be that this was granted to the aerodrome operator for any pilot or team needing to fly in such circumstances. Now the policy has changed needing a separate permission for each pilot or team thus potentially increasing the costs to the airshow community by a considerable amount. There is no safety benefit, just more income to the CAA.

**CAA response**

There has been no change in policy. In the overwhelming number of cases the permission to allow display practices is issued to the aerodrome rather than individual pilots. However, individual pilots (or even teams) may be required to apply for such permissions but in recent times, owing to specific factors, only one such permission has been issued in this way.

**GAS5: Why no CAP 632 charges for ex-military aircraft operations?****Ref 001**

I was not aware of this charge for SSAC operations but the proposed increase is in line with reasonable inflation.

Coupled to this is the matter of CAP632 operation of ex-military aircraft. Is there any charge for this to the operators involved? If not, why not...???

On the other hand if you were to impose a swingeing charge for this then that would be another gigantic nail in the coffin of UK historic aviation in general and the airshow industry in particular.

#### CAA response

The area of CAP 632 charges has not been considered within this consultation but we may return to it in the future. CAP 632 operators will however be affected by the increase of 1.5% in the airworthiness charges.

## **GAS6: Reduced charges for air displays held for charitable causes**

### **Ref 003**

As owner of Little Gransden Airfield (EGMJ) and a key representative of the Little Gransden Air & Vintage Car Show (LGACS) a recognised charity who has for the last twenty five years hosted an air show with the prime purpose of raising funds for Children in Need, I write to you with the greatest concern going into the 2017 season and the significant increase in permission fees.

In short, LGACS submits an annual request to permit 19-24 aircraft to display at the event. Every individual helping to put the show together, does so purely on a voluntary basis without charging, although we do cover some direct expenses such as travel fuel, postage etc. but this is kept to an absolute minimum. Many of the individuals taking part in the air display do so free of charge, but we might cover a nominal amount of aircraft fuel for some.

This year LGACS raised a total of £14,300 for the Children in Need appeal, bringing a year-on-year total of approx. £350,000 accumulated over the last twenty five. Once again, I reiterate that these funds are raised specifically for Children in Need and local charities and indeed, it was a great privilege to be recognised and invited to a live link at Milton Keynes Stadium last Friday, to hand over the cheque live on television which formed part of the whole Children in Need appeal evening.

Total charges currently published by the CAA for the 2017 season to accommodate the LGACS amount to £4,994; made up of a £2,994 application fee and an immediate demand for £2,000 post show. This amount is taken directly from the

amount raised at the air show, with the remaining balance being donated directly to Children in Need.

I speak on behalf of my fellow pilots, the volunteers who often spend days and hours of their own time, free of charge, to bring together what has become a much loved show, visited by many from across the UK and further afield to a venue that has contributed hundreds of thousands of pounds to a very worthwhile causes.

May I make a heartfelt request to the CAA and kindly ask them to consider making a reduction in their fees to that of a single item display permission for the LGACS going forward, along with all other charity events requesting CAA Permission. You do currently make a concession to fees for poppy and ashes dropping. There is no or very little additional work involved between the two and in reality this is a paperwork exercise taking no longer than two hours and does not justify a fee of £4,994.

#### CAA response

Air shows raise a considerable amount of money each year for a variety of great causes, thanks to the considerable efforts of dedicated volunteers.

Historically, our charges for processing air display permissions – and the other work associated with this – has significantly under-recovered the real cost of our activities. The new charges, although increased, still under-recover by some margin the true costs of our activities in this respect, not least due to the enhanced requirements arising from the review of how air displays are regulated following the tragic accident at Shoreham in 2015 and the AAIB's interim safety recommendations. This activity is already cross-subsidised by other airspace users and aerodromes.

Whilst the increased charges may place an additional burden on organisers, and could potentially reduce charitable proceeds, we have to prioritise the safe conduct of air shows and how we as a regulator provide the necessary oversight for this. Unfortunately, that comes at a financial cost, which is why we introduced a transitional arrangement to gradually phase in the increase, allowing air show organisers to develop their budgets accordingly. But while we still under-recover those costs from the air display community, it is difficult to see how we can offer a discount on our charges even for those air shows that focus on fundraising for charities.

## **GAS7: Why such significant charge increases for UAS activities including NQE charges?**

### **Ref 004**

Could the authority please explain why the increase in charges throughout this document are modest and proportionate except in the charges proposed to NQE's. How can the doubling of existing rates be justified?

What is the rationale behind such dramatic charge increases?

### **Ref 012**

Comments were received from Cloud9 Aviation to which a direct response was provided by the CAA.

### **Ref 013**

An increase of 228% for SUA under 20kg cannot be justifiable. It appears the CAA is profiteering from a growth area in aviation.

### **Ref 016**

It seems a perfectly sensible approach to charges i.e. proportionate to the work undertaken and a market rate for the hourly charge. By introducing such charges the CAA will be in a position to be resourced to task and provide a good service to the commercial drone operator community.

<b>CAA response</b>
See chapter 2, sections 2.9 to 2.11 in the main report.

## **GAS8: Air display charges are too high and disproportionate**

### **Ref 008**

Instead of using the UK Airshows industry as a cash cow, why don't you cut your cloth accordingly? After all millions of normal citizens and companies have had to. Already you're abysmal handling of the 2016 season has seen the end of many old airshows that were enjoyed by millions of people. What exactly are you going to do when you have invoiced the entire community out of existence? Where are your

pension funds going to come from then? The short-sightedness of your actions beggars belief. Or is it your intention to kill airshows completely? Because that is the impression that your actions leave to those who enjoy them.

**Ref 009**

Additional charges to the UK Display community will lead to a downturn in a lot of sectors in the GA commerce. Not only will this effect, traders, warbird owners, maintenance facilities, display organisations and the general public, it will lead to a downturn in GA in general. This will affect the Aviation community and deter rather than encourage the future generation of pilots to obtain their wings and go on to a career in the airline industry.

This will also affect the CAA coffers, less shows, less pilots will lead to a downturn in incomes, which is already stressed due to increased costs etc. please look at a longer term strategy and listen to your selective representatives from each sector.

**Ref 010**

I have carefully read all 13 pages, and my overall impression is that if an air show organiser was attempting to put together a viable budget before approaching the CAA, it would prove almost impossible. There is a mind bending plethora of additional and conditional charges, on top of the basic schedule of charges.

Simply no two people would come up with the same outcome when working out the liability in advance. It would also appear that in constructing the matrix of charges a disproportionate burden is place on the organisers of smaller air shows with the same number or possibly fewer flying acts.

My suggestion is that charges are banded into classes (or blocks) and a step arrangement is levied with a basic admin component included. Simply each class or block has a basic published i.e. known charge rounded to the nearest £50/£100 i.e. charges are rounded up to the nearest £50 or £100 which adequately covers all the work and function of the CAA for that class or block. In addition a percentage is levied by the CAA on gate receipts calculated on a per head basis. A case of swings and roundabouts, with larger organisations shouldering the greater financial burden.

Simply a show such as Farnborough with say 20 acts would be in a position to pay far more than a regional air show with say 20 acts.

The revenue is created by the number of admissions onto the 'showground'; and the ability to attract exhibitor and facility fees.

This may seem to be a simplistic approach but the CAA must realise that in order to hold the event and create a marketing/ sponsorship package, a known fixed budget cost must be decided upon, and known, usually some month's even years ahead of the event date.

So this should reduce the complicated array of charges, to say, three or four known amounts for a particular class or block. Each amount already 'bundling in' any ancillary charges for time, administration, overhead etc.

### **Ref 011**

We recognise and understand the CAA position outlined within CAP1477, CAA Statutory Charges 2017/18 consultation document. Furthermore we believe the approach and associated charges to be reasonable. However to some these charges appear excessive and to most an increase in charges is never welcomed especially when there is no tangible benefit for the additional expense. We believe that alongside the introduction of the new charging regime the CAA should commit to ensuring that the increased charges convert quickly into better response times to matters such as applications for permissions, exemptions etc. The Airshow industry would reasonably hold the CAA to account with regard to improved service levels running in parallel to the increased charges.

#### **CAA response**

The current Scheme of Charges is moving towards recovery of costs associated with the work carried out for air display activities. To move towards an "ability to pay" model, as proposed here, would require a change in our charging principles model which is not currently being considered.

## **GAS9: The Post Event charge is not related to CAA effort in processing the air display permission**

### **Ref 014**

This comment concerns the Post Event Charge. When this was introduced it was stated that it was the final instalment which taken together with the Basic Application Charge paid for the entire CAA effort in granting the display permission but was staged to allow the Event Organiser some relief in the total cost if the scope of the display were curtailed for whatever reason reducing the event's income and thereby the affordability of the charge. The implication being that ALL the CAA work on the display application would have been completed before the permission was granted but that a proportion of that cost would only be recovered following the display. Some Event Organises stage multiple flying displays during each summer season and a normally a single display permission application covering all the displays planned is submitted before the start of the season. When repeat displays are held the Basic Application Charge can be discounted in accordance with Table 1 and paragraphs 3.1 a) and 3.1 b) reflecting the fact that CAA workload is much reduced for the following displays. The charges for the season are calculated after applying the relevant discounts, and the fee for the entire season is normally paid in full before the season starts. The Post Event Charge (which was instigated to 'complete' the payment for CAA hours expended before the display permission was granted) is therefore unjustified following every subsequent event at the same venue. It could be argued that a single Post Event Charge could be paid following the first event of the season to cover any as yet unfunded CAA hours. Experience indicates that once the season's display permission has been granted little if any additional CAA hours are required as the season progresses and so the continued application of the Post Event Charge for all subsequent displays is exploitative.

### **Ref 022**

The Historic Aircraft Association (HAA) notes the proposal at pages 22/23 of the consultation document that the CAA intends to increase air display post-event charges in accordance with the phased introduction of the post-event charge, as notified last year in CAP 1388 dated March 2016. The HAA deplores the financial strangulation of the air display industry and urges the CAA to think again. We



recognise that additional work on the approval and oversight of air displays comes at a cost. However, the proposed scheme of charges provides a perverse incentive for display organisers to arrange fewer displays and to have fewer display items at each event, all of which reduces the scope for pilots to keep current on type and to stay in practice in their display sequence. This will inevitably lead to the cost of the CAA's charges being borne by a dwindling number of event organisers and a dwindling number of DAEs and DA holders. The HAA requires air display post-event charges to be frozen at the 2016/17 rates. Air displays are a key motivator for the general public to take a close interest in aviation in general and historic aircraft in particular. Pricing air displays out of existence will not serve the cause of aviation. Nor will it improve safety at those air displays that do continue.

#### CAA response

We are required by statute to recover our costs from those we regulate. We are still not recovering full costs for our regulation of air displays.

In setting up the Scheme as we have, we have tried to be as pragmatic as possible about how these costs are recovered, and the impact on those who are paying for them.

If we were to move to a first event post display charge only, it would necessarily result in increases in other areas of the air display charges to facilitate full cost recovery.

### **GAS10: Why double the charges for ex-military aircraft type rating exemptions?**

#### **Ref 022**

The Historic Aircraft Association (HAA) notes the proposal at page 23 of the consultation document to more than double the fees for the initial and renewal applications from pilots for aircraft type-rating exemptions for ex-military aircraft types. We note the argument that the work involved is not covered by the current fees. However, we urge the CAA to reconsider these drastic increases, which will only serve to discourage pilots from undertaking training in the UK to fly these iconic, but often demanding aircraft. In particular, we urge the CAA to demonstrate what value it is adding by the administrative work, which it expects individual pilots to pay for. Moreover, as CAP 632 requires an aircraft type rating exemption to be issued for

each specific type of aircraft, the HAA recommends that the CAA drastically reduces the charges for a second or subsequent type rating exemption on an ex-military aircraft of the same generic class.

**CAA response**

We have been under-recovering our costs associated with this activity. This work largely involves the checking of pilot licences, qualifications and medical certificates, records and log books for the aircraft type(s) concerned and the administrative time in raising the exemption documentation. These proposed charges now reflect the work undertaken in respect of issue and renewal of these exemptions.

## **Personnel Licensing Scheme (PLS)**

### **PLS1: There is no case for any difference between the charge for Class 1, 2 or 3 medical reports filed with the CAA via the AME on line system**

**Ref 005**

There is a difference in the filing fee for Class One and Class Two pilots, based on the cost to the CAA of having ECGs over-read in some cases.

This cost has now been transferred direct to the pilot, via his AME, who for some months now has been responsible for organising the over-reading of ECGs and paying directly for the service.

Medical Section will not acknowledge any connection between the filing fee and ECG over-reading costs. However the Section formerly paid, and now they do not. Instead the candidate pays twice.

There is no case for any difference between the filing fee of Class 1, 2 or 3 medical reports. The C1 and C3 should now be reduced to the same level as C2.

**CAA response**

The core funding of the medical department comes from AOC holders who support the vast majority of the department's work. However, charges are levied directly to AMEs but

**CAA response**

do not recover the full cost of the AME oversight programme; as such, the 'per medical fee' continues to support the cost of this programme.

## **PLS2: Greater transparency on the breakdown on activities and why should the funding only come from the larger AOC holders rather than from AMEs?**

**Ref 024**

Medical – where you propose to increase the variable AOC unit charge by 1.4% to recover £124,000 to fund 1.5 FTE Doctor positions.

- To the extent that this new resource is focussed on oversight/audit of AME and their practice British Airways believes the cost should be recovered from the AME.
- It is not obvious what “project work” the CAA will be involved in. British Airways is only aware of you shaping an Information Notice on a pilot support programme, as opposed to developing a support programme. British Airways is supportive of initiatives that would have us develop our own programmes under our own management system and is wary of the CAA imposing solutions in this sensitive area.
- The AME should also fund directly any costs associated with the development of a learning platform.
- You note that the costs you propose to incur “mainly” relate to commercial pilots, but clearly that is not exclusively so. By charging AME for these costs they will pass on those costs via their charges for their services in such a way as the burden should be spread between all users of their services in proportion to their use of those services – and not disproportionately borne by commercial aviation as you propose currently.

**CAA response**

Approximately, 95% of the work of the Medical Department is concerned with commercial pilots. All the casework for Class 2 and LAPL medical certificates had been delegated to AMEs. The Medical Dept. now only handles referrals (difficult/complex cases that require

**CAA response**

our guidance) and appeals.

The e-Learning platform is being developed as a support tool for AMEs to ensure they keep up to date in aeromedical practice and enhance their aeromedical decision making capability. It supports another of the Task Force recommendations. It will consist of a series of educational modules. We are exploring the possibility that it could also be used to support the education of pilots on mental health and other aeromedical issues (another post Germanwings tranche of work).

The post Germanwings work has been very wide ranging. The pilot assistance network that BA has set up is a small element of the overall work and we have to ensure that all operators can facilitate access to such a programme for their pilots. A summary of the Germanwings work will be finalised in the next couple of months. Major work streams have been: writing papers for the EASA Task Force, attending Task Force and related meetings, assisting the French accident investigators, being involved with the RMT .0700 technical group (writing, suggesting and commenting on proposals), attending stakeholder meetings and responding to stakeholder consultations, responding to draft Opinions and Decisions, addressing reporting mechanisms into the CAA, working with the General Medical Council on doctor awareness of reporting of public safety concerns, acting on the outputs of a CAA/DfT aviation mental health working group, and contributing to the proposed EU legislation on pilot support programmes.

Therefore, as the very high majority of the work of the Medical Dept. is concerning commercial pilots, it is proportionate that these costs are passed onto the larger AOC holders via the AOC variable charge rate.

## **Regulation of Airports Scheme (RAS)**

**RAS1: It is important that the CAA an appropriately resourced regulator in order to further the interests of passengers**

### **Ref 023**

The Regulation of Airports charge is proposed to increase by 1.5% to 4.82 pence for each arriving passenger.

Whilst any increase to costs faced by industry is always unwelcome, Heathrow acknowledges the critical role the CAA's Regulation of Airports fulfils. It is essential that the CAA has adequate resources in place during the H7 regulatory period to carry out its duties with respect to airports where a licence has been granted.

It is even more important than before than CAA is knowledgeable, appropriately resourced regulator and is able to make well informed decisions in a timely manner to fulfil its duties to further the interests of passengers.

CAA response
Noted.

## **RAS2: What costs does the additional variable charge within the Regulation of Airports cover?**

### **Ref 026**

The Regulation of Airports variable charges seem to be additional variable costs as already being applied to Aerodrome Licensing and ANSP variable charges? Does this mean that the airports pay the Licensing & ANSP charges plus another 1.43 charge for those 500,000 passengers once the figure reaches 500,001? This could restrict encouragement for airports to grow beyond a certain point.

CAA response
The Regulation of Airports Scheme variable charges relate to the recovery of our costs associated with our economic regulation of airport activities. The Aerodrome Licensing and ATS Regulation Scheme variable charges relate to our costs associated with our activities concerning the safety regulation of airports and air navigation service providers.

## General (GEN)

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### GEN1: Extending the direct debit facility to variable charges

#### Ref 024

We note that you have also stated that you propose to “extend the direct debit facility” in relation to several of the variable charges. It is not clear to us if this means that you plan to withdraw the ability to pay these charges via any other method, or simply to add the direct debit facility as an extra option. If you mean to withdraw the option to pay via existing methods then we find this unacceptable. British Airways cannot agree to pay charges via direct debit.

#### CAA response

Due to the responses received we are withdrawing this proposal. However, in future years we will strongly consider moving to direct debit for the collection of our charges.

### GEN2: The general price increase of 1.5% is not applied uniformly

#### Ref 023, Ref 026

In respect of the grant of a FISO Licence, the proposed increase from £104 to £106 shows an increase of 1.9% despite stating ‘increase of 1.5% across all Charges Schemes in 2017/18’.

In respect of the ATC service at an aerodrome the holder shall pay an increase from 1.11 pence to 1.13 pence for each Work Load Unit at the aerodrome during that month. This price increase is 1.7% and not 1.5%

#### CAA response

The overall price increase is 1.5% across all Schemes of Charges in 2017/18. There will be rounding issues as we charge to the nearest whole pound. In the two examples given above, if we rounded down, the respective percentage increases would be 1.0% and 0.9%. Generally across the 1,300 individual charges within the 13 Schemes of Charges, the percentage overall increase is 1.5%.

## Direct replies

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Submissions were received from the following organisations to which direct replies were made by the CAA:

- Ref 003 – Airdisplays.com Ltd – relating to air display charges
- Ref 006 – Airport Operators Association – relating to the funding of Security Management System work
- Ref 012 – Cloud9 Aviation – relating to drone charges