

Michael Kitchen

Department for Transport
Great Minster House
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Dear Lady Vere,

I am emailing you in your capacity as Aviation Minister as I have misgivings about the proposed Drone Registration Scheme in CAP 1775 and how it will affect my chosen sport of model aviation.

- I appreciate that the CAA has to implement the registration of drone operators and of certified drones to comply with the EASA vote to implement the European Commission's proposals on drone operation. It just appears that many of our continental neighbours have interpreted the proposals in a manner that are less onerous and costly for pilots of model aircraft. Most countries have already implemented their version of the EASA drone registration scheme and many have proven successful (as in uptake), why can we not learn something from the successful ones?
- Nobody could object to the CAA charging a fee to cover the administration costs of the registration scheme, if the overall costs are value for money and are reasonable in the first place. The CAA suggestion that the scheme will cost £2.8 million per annum seems extortionate, to the point that either the CAA or their advisers have been badly informed or are incompetent. Or is it another case of government profligacy? A database for 170,000 users could and indeed should be implemented and maintained for a fraction of their estimate. Pro rata the BMFA (British Model Flying Association) does its database for considerably less per user. And their proposed "other fixed costs" is extortionate as well. And I'm sorry, publicising the scheme with a campaign should be paid for by the government as is the case with publicising other legislation (which the scheme is).
- The CAA predicts that 170,000 people will register based on the figures from the USA and Ireland. The cost in the USA is \$5 for three years (approximately £1.32 per annum). In Ireland it is €5 per annum (approximately £4.44). Surely they should have based their figures on countries who have already implemented their scheme with similar fees per annum? As a matter of interest the scheme in France is free. Yes free, as in no cost. And the uptake as a percentage of the population has been I believe, higher than in the USA or Ireland. Therefore we could infer a correlation between lower fees and higher uptake. So we could infer that a fee of £16.50 will deter many from registering. Do the CAA and government really want people to register or are they deliberately trying to deter people from registering? With a fee of £16.50 it will be a deterrent for most casual flyers.

- The cost of registration is then compared to the cost of registration schemes such as fishing and firearms with the comment that they are both more expensive. I do not think they are fair comparisons and is factually incorrect. They are both better value for money and in the case of a shotgun licence, cheaper.
 - A Rod Fishing Licence is £30 per annum, but a large proportion of the fee is spent on infrastructure that benefits fishermen, not on administration. Last year “sales of rod licences funded 350,000 fish being restocked into rivers, responding to 797 fisheries incidents and installing 37 fish passes amongst other things”. So fishermen get some real benefits for their licence fee. What benefits do model aircraft pilots get for their proposed fee? None, the proposed cost is all administration.
 - A Rod Fishing Licence has concessions for the young and those over 65 years age and they are available on a daily or weekly basis for infrequent users. No such concessions are proposed for the drone registration
 - A Shotgun Certificate Renewal costs £49 for 5 years or £9.80 per annum, so unless I’m mistaken that is less expensive than the proposed drone registration of £16.50. And the CAA quote that the drone registration will be automated whereas the Shotgun Certificate has police involvement which surely is a greater expense? Or are model pilots going to be subjected to Police checks as well?

- My estimate of uptake to the drone registration is approximately 50,000. Why? All responsible model aircraft and drone pilots fly with adequate third party insurance and the most economical way to obtain this insurance is through one of the associations representing model aviation, such as the BMFA, SAA (Scottish Aeromodellers Association), LMA (Large Model Association) or FPVUK (First Person View UK). If you combine the membership from these associations, I understand you get a figure of around 40,000. At best another 10,000 will sign up, if they can’t be bothered with insurance, they won’t bother with registration. What fee does the CAA propose to charge if there is only a 50,000 uptake for the registration? It would appear that they would then divide the £2.8m between 50,000 = £56? But I assume the CAA would have less costs with a smaller database?

So in conclusion, could I have your assurance that you will investigate if the CAA proposals are flawed and/or inaccurate and insist that the document is amended or withdrawn until it is “fit for purpose”.

Yours sincerely

Michael Kitchen