Opinion: EANDCB validation

Origin: domestic

RPC reference number: RPC-3782(1)-DFT-CAA

Date of implementation: April 2017



The Civil Aviation Authority Aerodrome Wildlife Hazard Management

RPC rating: validated

The BIT assessment is now fit for purpose as a result of the department's response to the RPC's initial review notice. As first submitted, the assessment was not fit for purpose.

Description of proposal

The proposal amends the Civil Aviation Authority (CAA) guidance on the maintenance of an effective Bird Control Management Plan, which reduces the risk of birds interfering with flights. The amendments propose new ways in which an operator may manage an aerodrome environment to make it less attractive to birds; specifically, they permit operators to set their own proportionate policy for managing long grass at airports, rather than adhering to fixed limits for grass height and frequency of cutting.

Impacts of proposal

The regulator has consulted aerodrome habitat managers and compliance managers at UK airports and aerodromes to analyse the costs and benefits of the proposal. It expects that 20 large, 30 medium, and 76 small aerodromes will be affected by the proposal.

The bulk of the benefits derive from a decrease in the frequency with which aerodrome operators are required to cut grass. Following consultation with the industry, the regulator expects that the cost of land management contracts to medium and large aerodromes will be reduced by around 50%, in proportion to the number of visits expected. The CAA estimates that they will receive an average annual contract saving of £35,000 each for large aerodromes and £18,500 each for medium aerodromes. There will also be an opportunity for savings for small aerodromes; the CAA has sought information on these from small aerodrome managers and has been advised that any time savings from revised grass cutting regimes are more ad-hoc and are dependent on weather and levels of activity on runways. For this reason, it has not been able to estimate these savings, although it expects them to be small, relative to the savings at larger aerodromes.

The total savings are therefore expected to be £1.25 million annually.

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Based on standard assumptions about reading speeds and industry salaries, the submission also anticipates a total cost of familiarisation with guidance measures of £2,500 across all 126 aerodromes.

The RPC verifies the estimated equivalent annual net direct cost to business (EANDCB) of -£1.1 million. This is a qualifying regulatory provision that will score under the Business Impact Target.

Quality of submission

As initially submitted for RPC scrutiny, the assessment was not considered fit for purpose as the CAA had used an assumption of 50% reduction in the need to hire specialists to maintain aerodrome habitat, which appeared to be unsupported. The CAA has now provided clear evidence from aerodromes and habitat operators in support of this assumption.

The CAA has also provided clearer evidence to support the other assumptions used in its cost calculations, including a breakdown of the savings per aerodrome according to size.

Departmental assessment

Classification	Qualifying regulatory provision (OUT)
Equivalent annual net direct cost to business (EANDCB)	-£1.1 million
Business net present value	£10.76 million

RPC assessment¹

Classification	Qualifying regulatory provision (OUT)
EANDCB – RPC validated	-£1.1 million
Business impact target score	-£5.5 million

¹ For reporting purposes, the RPC validates EANDCB and BIT figures to the nearest £100,000

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Michael Gibbons CBE, Chairman

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