

Impact Assessment, The Home Office

Title: General Aviation (Persons Onboard and Flight Information) Regulations

Date: 1 December 2022

IA No: HO0347

RPC Reference: N/A

Stage: CONSULTATION

Intervention: Domestic

Other departments or agencies: N/A

Measure: Secondary legislation

Enquiries:

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RPC Opinion: Not Applicable

Business Impact Target: Non qualifying provision

Cost of Option 1 (in 2020 prices)

Net Present Social Value NPSV (£m)	-0.9	Business Net Present Value BNPV (£m)	-0.8	Net cost to business per year EANDCB (£m)	0.1
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What is the problem under consideration? Why is government intervention necessary?

Border Force (BF) estimate that no passenger, crew or service information is received for approximately 10 per cent of inbound General Aviation (GA) flights – equating to about 6,250 flights a year (based on 2019 figures from DfT). This represents a significant challenge to border security. As passengers on scheduled flights come under increasing border security scrutiny through the electronic submission and analysis of advance passenger information (API) and booking information, private or privately chartered aircraft which can arrive at remote airport stands or locations will appear increasingly attractive to individuals or groups seeking to avoid detection.

What is the strategic objective? What are the main policy objectives and intended effects?

Strategic objective: To strengthen border security within the GA sector in order to better protect UK citizens against potential threats from people and goods.

Policy objectives: To enhance border security and to enable automated checking of data and to tackle non-compliance from an estimated 10 per cent of the sector. To bring the coverage and requirements for the submission of advance data in the international GA sector into line with scheduled aviation by requiring submission of information in advance of departure and online.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

Option 1: (Do-nothing) Continue to rely on existing HMRC legislation, with no online reporting.

Option 2: Introduce a requirement to submit information about the flight and persons on board (General Aviation Report (GAR)) information in advance and online for all international GA flights.

Option 3: Border Force to serve six-monthly requirements on all pilots, owners and operators of international GA flights with the same information requests as **Option 2**.

Option 4: Encourage voluntary use of online portals, for GAR submission.

Main assumptions/sensitivities and economic/analytical risks

Discount rate (%)

3.5

The main assumptions are the number of GA pilots, owners and operators who will need to read the updated guidance and the number of international GA flights. The most uncertain assumptions are the proportion of business and leisure flights operated by UK businesses or private individuals based in the UK, and the number of flights affected (due to the information gap this regulation addresses). **Option 3** cannot be fully costed as it is likely to be unworkable to identify all non-UK pilots, owners or operators wishing to travel to the UK in the subsequent six months.

Will the policy be reviewed? It will be reviewed. **If applicable, set review date:** April 2024

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible Minister: _____



Date: _____

December 2022

Summary: Analysis & Evidence

Policy Option 2

Description: a new requirement to submit a GAR online and in advance of departure for all international GA flights.

FULL ECONOMIC ASSESSMENT

Year(s):	Price Base	2020	PV Base	2020	Appraisal	10	Transition	1
Estimate of Net Present Social Value NPSV (£m)						Estimate of BNPV (£m)		
Low:	-0.3	High:	-2.2	Best:	-0.9	Best BNPV	-0.8	

COSTS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	0.3	0.0	0.3	0.0	0.3
High	1.0	1.2	2.2	0.2	2.0
Best Estimate	0.6	0.3	0.9	0.1	0.8

Description and scale of key monetised costs by 'main affected groups'

There are familiarisation costs to the public and private sectors in year 1 only. The central estimate for these is **£0.6 million**, between **£0.3 and £1.0 million**. Pilots, owners and operators who are not currently providing information as per the current GAR requirements may face additional costs. These costs are estimated to be **£0.3 million (PV)**, between **£0.0 and £1.2 million** over 10 years.

Other key non-monetised costs by 'main affected groups'

It is not anticipated that there will be any additional costs associated with the proposed policy change.

BENEFITS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	0.0	0.0	0.0	0.0	0.0
High	0.0	0.0	0.0	0.0	0.0
Best Estimate	0.0	0.0	0.0	0.0	0.0

Description and scale of key monetised benefits by 'main affected groups'

No benefits have been monetised due to a lack of data.

Other key non-monetised benefits by 'main affected groups'

The main benefits of **Option 2** are improved monitoring of international GA flights and the resulting mitigation of safety and security risks. This policy enables BF to provide an accurate, proportionate and effective risk-led operational response to GA. This could have human and financial cost-savings through the prevention and detection of terrorism and serious organised crime.

BUSINESS ASSESSMENT (Option 2)

Direct impact on business (Equivalent Annual) £m:									
Cost, £m	0.1	Benefit, £m	0.0	Net, £m	-0.1				
Score for Business Impact Target (qualifying provisions only) £m:					N/A				
Is this measure likely to impact on trade and investment?					N				
Are any of these organisations in scope?		Micro	Y	Small	Y	Medium	Y	Large	Y
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)				Traded:	N/A	Non-Traded:	N/A		

PEOPLE AND SPECIFIC IMPACTS ASSESSMENT (Option 2)

Are all relevant Specific Impacts included?	Y	Are there any impacts on particular groups?	N
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Summary: Analysis & Evidence

Policy Option 3

Description: six-monthly service of a legal requirement on GA pilots, owners or operators to submit information about the flight and persons on board online and in advance of departure for all international flights

FULL ECONOMIC ASSESSMENT

Year(s):	Price Base	2020	PV Base	2020	Appraisal	10	Transition	1
Estimate of Net Present Social Value NPSV (£m)						Estimate of BNPV (£m)		
Low:	-0.4	High:	-2.3	Best:	-0.9	Best BNPV	-0.8	

COSTS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	0.3	0.0	0.4	0.0	0.3
High	1.1	1.2	2.3	0.3	2.0
Best Estimate	0.7	0.3	0.9	0.1	0.8

Description and scale of key monetised costs by 'main affected groups'

There will be set-up costs to both the public and private sector in year 1 only. The central estimate for these costs is **£0.7 million**, between **£0.3 and £1.1 million**. Pilots, owners and operators who are not currently providing information as per the current GAR requirements may face additional costs in submitting information online. These are the same as **Option 2**.

Other key non-monetised costs by 'main affected groups'

There would be a significant cost to BF to try and identify all foreign GA pilots, owners and operators who may at some point wish to travel to the UK, this would need to be reviewed continuously to ensure the information was up to date. This would be labour-intensive and there is considerable doubt the task would be possible.

BENEFITS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	0.0	0.0	0.0	0.0	0.0
High	0.0	0.0	0.0	0.0	0.0
Best Estimate	0.0	0.0	0.0	0.0	0.0

Description and scale of key monetised benefits by 'main affected groups'

No benefits have been monetised due to a lack of data.

Other key non-monetised benefits by 'main affected groups'

As with **Option 2**, the main benefits of this policy option are improved monitoring of international GA flights and the resulting mitigation of safety and security risks. However, the mitigation and resultant increase in public safety will not be fully effective without identifying all non-UK pilots, owners or operators who may wish to travel to the UK in the subsequent six months

BUSINESS ASSESSMENT (Option 3)

Direct impact on business (Equivalent Annual) £m:									
Cost, £m	0.1	Benefit, £m	0.0	Net, £m	-0.1				
Score for Business Impact Target (qualifying provisions only) £m:					N/A				
Is this measure likely to impact on trade and investment?					N				
Are any of these organisations in scope?		Micro	Y	Small	Y	Medium	Y	Large	Y
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)				Traded:	N/A	Non-Traded:	N/A		

PEOPLE AND SPECIFIC IMPACTS ASSESSMENT (Option 3)

Are all relevant Specific Impacts included?	Y	Are there any impacts on particular groups?	N
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Summary: Analysis & Evidence

Policy Option 4

Description: voluntary use of the submit-a-GAR online portal or other alternative portals for the submission of GARs

FULL ECONOMIC ASSESSMENT

Year(s):	Price Base	2020	PV Base	2020	Appraisal	10	Transition	1
Estimate of Net Present Social Value NPSV (£m)						Estimate of BNPV (£m)		
Low:	-0.3	High:	-0.9	Best:	-0.5	Best BNPV	-0.5	

COSTS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	0.3	0.0	0.3	0.0	0.3
High	0.9	0.0	0.9	0.1	0.8
Best Estimate	0.5	0.0	0.5	0.1	0.5

Description and scale of key monetised costs by 'main affected groups'

There will be familiarisation costs to both the public and private sector in year 1 only. The central estimate for these costs is **£0.5 million**, between **£0.3 and £0.9 million**. There will be no ongoing or any other additional costs as compliance is not mandatory.

Other key non-monetised costs by 'main affected groups'

It is not anticipated that there will be any additional costs associated with the proposed policy change. It is assumed that currently non-compliant pilots, owners and operators will remain non-compliant under **Option 4**.

BENEFITS, £m	Transition Constant Price	Ongoing Present Value	Total Present Value	Average/year Constant Price	To Business Present Value
Low	0.0	0.0	0.0	0.0	0.0
High	0.0	0.0	0.0	0.0	0.0
Best Estimate	0.0	0.0	0.0	0.0	0.0

Description and scale of key monetised benefits by 'main affected groups'

No benefits have been monetised due to a lack of data.

Other key non-monetised benefits by 'main affected groups'

This policy option encourages the submission of GARs using the online portal in order to comply with HMRC Commissioners Direction's. However, as online submission is not mandatory it does not provide the benefits to BF in terms of monitoring and processing international flights adequately. It is unlikely to have the necessary effect on preventing and detecting terrorism and serious organised crime nor would it enable BF to enforce non-compliance.

BUSINESS ASSESSMENT (Option 4)

Direct impact on business (Equivalent Annual) £m:										
Cost, £m	0.1	Benefit, £m	0.0	Net, £m	-0.1					
Score for Business Impact Target (qualifying provisions only) £m:					N/A					
Is this measure likely to impact on trade and investment?					N					
Are any of these organisations in scope?			Micro	Y	Small	Y	Medium	Y	Large	Y
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)				Traded:	N/A	Non-Traded:	N/A			

PEOPLE AND SPECIFIC IMPACTS ASSESSMENT (Option 4)

Are all relevant Specific Impacts included?	Y	Are there any impacts on particular groups?	N
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A. Strategic Objective and Overview

A.1 Strategic Objective

1. As detailed in the Home Office Single Departmental Plan 2021-22¹ (SDP), the department is committed to reducing crime (including serious and organised crime, SOC), and the harm it causes, reducing terrorism and, securing the border against threats from people and goods.
2. It is likely that the General Aviation (GA) sector is being exploited by individuals involved in SOC, it is also possible that GA may be used as an avenue for terrorism-related activities.
3. Introducing a requirement for information about international GA flights and persons on board to be submitted in advance and online will mean BF can better assess all arriving flights to determine the risk each poses. This measure aims to correct the weaknesses associated with different reporting mechanisms and reduce opportunities for illegal activity at the border.

A.2 Background

4. Accurate and timely passenger data is a valuable tool for border security. Travel document and flight information received in advance (known as API) on all scheduled flights to or from the UK supports pre-departure interventions and pre-arrival targeting activity.
5. There were over 1.6 million scheduled flights to and from the UK in 2019 and approximately 125,000 unscheduled GA flights². Border Force (BF) estimate that no data is received for approximately 10 per cent of inbound GA flights – equating to 6,250 flights a year – this represents a significant challenge to border security. As passengers on scheduled flights come under increasing scrutiny through data analysis; private or privately chartered aircraft which can arrive at remote airport stands or locations will appear increasingly attractive to individuals or groups seeking to avoid detection including those involved in terrorism or serious organised crime.
6. International GA flights do not operate to a published or scheduled timetable and cover a wide spectrum including: leisure flyers and business/corporate travellers. These flights can land at over 3,600 private and licenced airfields in the UK, of which 400 are used regularly, but which cannot always be staffed by a BF officer. This is a significant challenge to securing complete coverage at, and security of the border.
7. If BF were to meet all international GA passengers as they do with those arriving on scheduled international flights, the Home Office would need to permanently staff all GA airfields with BF officers. This would not be practical – as many of these airfields see infrequent aircraft movements – officers would have long periods of inactivity, providing poor value for money (VfM) for the taxpayer.
8. BF manages this challenge on the basis of risk assessment. An operator or pilot of GA aircraft is requested to provide a GAR in advance of each international flight to or from the UK. Changes to the HM Revenue and Customs (HMRC) Commissioners Direction's (CDs) came into effect on 6 April 2022 meaning all international flights to or from the UK are now required to report for customs purposes (previously there was no requirement to report outbound flights from the UK to a destination in the EU), the new CD's also include a single reporting requirement of two hours prior to departure irrespective of port of departure or arrival. The GAR contains information about those on board as well as information about the type of aircraft, the arrival and departure ports and the scheduled times of arrival and departure. The GAR, and those individuals listed on it, is risk-assessed along with the flight plan and allows BF and the police to assess the flight and meet it if necessary.
9. A GAR is required for customs purposes, submitted in accordance with CDs made under sections 35 & 64 Customs and Excise Management Act 1979 (CEMA 1979) and can be shared for

¹ Home Office Outcome Delivery Plan 2021-22, see: <https://www.gov.uk/government/publications/home-office-outcome-delivery-plan/home-office-outcome-delivery-plan-2021-to-2022>

² CAA and Department for Transport; <https://www.gov.uk/government/collections/aviation-statistics>

immigration and policing purposes in accordance with section 36 of Immigration and Nationality Act 2006 (IANA 2006)³. As well as online submission, the CDs permit GAR submission in various ways, by email, fax or in writing, all of which preclude BF from conducting automated checks.

10. As well as manual GAR submission, there are also electronic methods, for example, third party subscription-based portals or Fixed Base Operators' (FBOs)⁴ systems which have been developed to connect directly to Home Office systems. Existing third party portals or FBO systems which connect directly to Home Office systems and comply with the proposed regulations can continue to be used. Additionally, in March 2019, BF launched a free to use internet service⁵, 'submit-a-GAR' (s-GAR), through which GA pilots, owners and operators can submit GARs online.
11. Currently, approximately 51 per cent of GARs are submitted in an electronic manner that enables automated checks to be conducted by BF. Whilst uptake of the 'submit-a-GAR' service has increased year-on-year, the volume of users is still proportionally low.
12. The Home Office proposal will require all GA pilots, owners or operators to submit information about the flight and persons on board online, in advance of departure, replacing the submission of GARs by email, fax and in writing. This will allow BF to automatically check the data in advance of travel, leading to an enhanced risk assessing capability. By strengthening the advance reporting process, supported by a robust civil penalty to enforce non-compliance, border authorities will have a more complete picture of persons on board to counter risks from individuals looking to exploit vulnerabilities at the border. The proposal will introduce a single timing requirement for all international flights irrespective of the destination or origin. This will align with CDs introduced on 6 April 2022, and harmonise the information required for national security, policing, immigration and customs purposes. This means that by submitting the required information online in accordance with the proposed regulations, a GA pilot, owner or operator will have satisfied both BF and HMRC requirements.
13. The Home Office will consult the GA sector, seeking its views on the scope of the new regulations, the proposed information and timeliness requirements. It will also seek views on any alternative method to new regulations through which the Home Office could achieve its policy objectives such as HMRC introducing new CDs that required the online submission of a GAR.

A.3 Groups Affected

14. The main groups affected by this policy are:
 - GA business pilots and Fixed Base Operators (FBOs).
 - GA leisure pilots.
 - BF Officers, Counter Terrorism Police Officers (CTPOs) and National Crime Agency (NCA) staff with responsibility for border operations.
15. All GA business pilots, FBOs and leisure pilots will face costs from familiarising themselves with the guidance and registering with the online portal. Pilots / owners and operators who are currently non-compliant will face additional costs (under **Options 2 and 3**) as submitting information about the flight and persons on board becomes mandatory. Border Force will also have to familiarise themselves with the new regulations which will carry a small cost.

³ There is also a specific notification requirement under the Terrorism Act 2000 for flights within the Common Travel Area (CTA) which is separate from these proposals.

⁴ Fixed Base Operators (FBOs) can be operators of GA flights and/or provide ground handler services to GA operators, reference to FBOs throughout this document should be interpreted as covering both.

⁵ Create GAR | Start (submit-general-aviation-report.service.gov.uk)

B. Rationale for intervention

16. Advance passenger information (API) is received for 100 per cent of scheduled international flights to and from the UK, excluding the Common Travel Area (CTA), for which API is received for approximately 71 per cent of scheduled flights. This information is received directly into Home Office systems and its form and manner is specified in The Immigration (Form and Manner of Passenger Information) Direction 2018⁶. As passengers on scheduled flights come under increasing border security scrutiny through sophisticated data analysis, GA flights arriving at remote locations with no permanent BF presence will appear increasingly attractive for those involved in SOC and terrorism who are seeking to avoid notice or detection. This is exacerbated by the lack of requirement setting out the manner in which GARs should be submitted, nor is there a robust penalty regime that would enforce compliance across the GA sector. The proposed policy aims to fill this information gap thus helping to minimise the risk posed by international GA flights.

C. Policy objective

17. The policy objectives for the GA Persons on Board and Flight Information Regulations are to:
 - Ensure greater border security by receiving and processing the advance information of all individuals seeking to travel to and from the UK on a GA flight.
 - Fill the information gap resulting from the current reliance on the existing CDs and non-compliance from an estimated 10 per cent of the sector.
 - Require the online submission of information about the flight and persons on board enabling the automated checking of the data.
 - Build a more complete intelligence picture of international GA flights, to improve risk assessment of flights and inform intelligence concerning terrorism and serious organised crime trafficking risks while providing a proportional operational response to GA.
 - Achieve high levels of compliance as a result of a civil-penalty regime.
 - Bring coverage for the advance submission of data in the international GA sector into line with that of the scheduled commercial aviation sector.

D. Options considered and implementation

Option 1: (Do-nothing)

18. Retain the current regime of relying on HMRC CDs for the provision of data. A significant minority (approximately 10%) of GA pilots / owners / operators do not submit a GAR, representing a significant challenge to border security. Of the GARs received, about 55 per cent are received via email, fax, in writing or verbally which does not allow for automated checks to more effectively identify those who may seek to cause harm. **Option 1** will not deliver the intended policy objectives.

⁶https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/709356/Immigration_Form_and_Manner_of_Passenger_Information_Direction_2018.pdf

Option 2:

19. Require the online submission of information about the flight and persons on board in advance of all international GA flights using one of the following:
 - a) An existing, compliant, third party flying apps,
 - b) Compliant FBO systems with direct connections to Home Office systems, or
 - c) The Home Office's GAR portal.
20. This provides the most proportionate and cost-effective response to the outlined deficiencies of current GA reporting requirements as set out in section A.
21. Compliance with this requirement will be underpinned by a civil penalty regime. A penalty would be imposed upon the pilot, owner or operator where they failed to provide:
 - a) The required information,
 - b) The required information in the specified form and manner, or
 - c) The required information within the specified timeframes for submission.

Option 3:

22. Serve six-monthly written information requirements on pilots / owners and operators of international GA flights, in accordance with paragraphs 27 and 27B of Schedule 2 to the Immigration Act 1971 (IA 1971). **Option 3** would require information about the flight and persons on board to be submitted in advance and online, as in **Option 2** above, mirroring the approach taken with scheduled aviation where API is received directly from airline systems. This would require BF to identify all GA pilots, owners or operators, both UK based and international that make (or were likely to make) international flights to or from the UK. The administrative implications of this are significant and may render this option unworkable. Having to identify overseas-based pilots, owners or operators who may fly here (potentially only on an ad-hoc or one-off basis) and serve the relevant documentation on them every six months would place a bureaucratic burden on BF that would most probably outweigh the potential benefits of **Option 3**. As with **Option 2** compliance with this requirement will be underpinned by a civil penalty regime.

Option 4:

23. Encourage voluntary use of online portals and direct system connectivity in line with the requirement to comply with the CDs, without the requirement to compel online submission. Border Force would need to invest time and resources into launching a campaign to encourage voluntary online provision. Whilst there may be an increased uptake from compliant individuals who do not submit GARs online, it is likely that GA pilots / owners and operators who seek to evade detection would not use a portal to submit data or be a part of the communities BF engage with as part of their campaign. This means that the current 10 per cent of non-compliant GA pilots / owners and operators would be unlikely to change their behaviour with this option.

Rejected alternative option:

24. Staffing all airfields and landing strips: there are around 3,600 airfields and landing strips in the UK that are used by GA aircraft. Many of these are used infrequently. Staffing these would be an unacceptable burden on the taxpayer and inefficient spend of taxation. Continuing to apply risk-led coverage and requiring advance data online is more proportionate to the problem.

E. Appraisal

General assumptions and data

25. The appraisal period for measuring the impacts of the proposed regulation is 10 years, with an annual social discount rate of 3.5 per cent used. A 22 per cent⁷ uplift has been applied to hourly wage costs in order to capture non-wage labour costs, based on Eurostat (2019) labour cost split. Other data have been collected primarily from the Annual Survey of Household Earnings⁸ (ASHE 2020) and the Civil Aviation Authority⁹ (CAA). Estimates are in 2020 prices, the price base year (PBY) and 2020 is also used as the present value base year (PVBY) for discounted values. Optimism bias has not been applied to the analysis.

Appraisal

26. The volume of international GA flights is estimated using the Department for Transport (DfT) and CAA's¹⁰ data for non-scheduled flights from all reporting airports and an additional 10 airports for which there is only summary data available. However, a 15-month BF study conducted in 2019 and 2020 found that there were significantly more aerodromes in use than just the reporting and summary airports. Therefore, the number of flights is uplifted from the most recent 2019 figure (around 125,000) to capture international GA flights for which the CAA and DfT do not have record of. The number of international GA flights per year is then estimated as 170,000, within a range of 140,000 and 200,000. The frequency with which other aerodromes are used and the level of underreporting is unclear. Sensitivity analysis has been undertaken in the risks section to determine the effect of flight volumes on cost.

COSTS

Set-up costs

Business flights

27. The change in legislation and potential changes to the data submission requirements may lead to familiarisation costs for FBOs and professional pilots in year 1 as they need to register and become familiar with using the new online 'submit a GAR' portal. The number of individuals in GA related employment is taken from the General Aviation Economic Research Study¹¹. The volume of pilots has been estimated by the CAA¹². The opportunity cost is the time taken to read the updated guidance. Not all FBOs deal with GARs in their employment and so familiarisation costs are estimated from the proportion of FBOs who will need to read the guidance.¹³ Not all professional pilot licence holders make business aviation flights and so business familiarisation costs are estimated from the proportion of GA flights that are business rather than leisure in nature.
28. The following assumptions (see **Table A.1** in **Annex 1**) have been made to provide an estimate of the cost:

⁷ https://ec.europa.eu/eurostat/statistics-explained/index.php/Wages_and_labour_costs#Labour_costs

⁸ <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/occupation4digitsoc2010ashetable14>

⁹ <https://www.caa.co.uk/General-aviation/>

¹⁰ CAA and Department for Transport; <https://www.gov.uk/government/collections/aviation-statistics>

¹¹ General Aviation Economic Research Study, 2015, York Aviation, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/417053/GA_Economic_Research_-_Summary_of_Key_Findings.pdf

¹² Email from CAA communications department, 08/05/19

¹³ based off ground handler information

- The estimated number of professional business pilots affected is based on estimates of the number of pilots who currently hold a licence multiplied by the proportion who make international business flights; volume of professional pilot licences held (CAA) x 67 per cent.
- The current GAR guidance document is 10 pages long, including annexes. It is estimated that familiarisation could take between 6 and 50 minutes (BF and standard reading tables¹⁴).
- It is estimated that the time taken to register and sign up for the online portal will be 45 minutes, with a range of 30 to 60 minutes.
- For business GA pilots, it is assumed that 50 per cent of portal registrations are completed by the pilots and 50 per cent by FBOs. This is materially important because business pilots and FBOs have a different value of time (wage) attributed to them.
- It is assumed that employees earn the median wage suggested by the Annual Survey of Hours and Earnings (ASHE 2020)¹⁵ for their specific occupation. These wages are grossed up by 22 per cent to take into account non-wage costs to employers¹⁶. Air transport operatives earn a gross wage of £13.54 per hour which is used in the estimates. As some operators may not have FBOs to submit advance data, some GA operators will use pilots instead. ASHE 2020 edition does not have an estimate for the median wage of a pilot due to unreliability of data. However the 2019 edition does, and this is modified into 2020 prices using HM Treasury's GDP deflator¹⁷ and then the uplift is applied. The gross wage of a professional pilot conducting business aviation flights is taken as £48.33 per hour.

29. Private business familiarisation costs are calculated as:

$$\text{Volume of employees} \times (\text{time taken to read the guidance (hrs)} + \text{time taken to register on the GAR portal (hrs)}) \times \text{gross wage (£/hr)}.$$

30. These assumptions lead to estimated familiarisation costs in a range of **£0.3 to £0.9 million**, with a central estimate of **£0.5 million** (2020 prices) in year 1 only. **Table A.1** in **Annex 1** presents these estimates, data and the assumptions.

Private leisure flights

31. There are likely to be familiarisation costs for private leisure pilots as they will be affected by the change in legislation. These pilots will also have to familiarise themselves with the online requirement. The volume of pilots is estimated based on the stock of private pilots' licences according to CAA. The opportunity cost is the time taken to read the updated guidance and register for the online portal. Leisure familiarisation costs apply to those pilots who hold a licence which allows them to make international flights but do not make any business aviation flights.
32. The following assumptions (see **Table A.1**) have been made to provide an estimate of the cost:
- The number of private leisure pilots is assumed to be equivalent to the proportion of GA flights that are leisure rather than business in nature, that is, 33 per cent.
 - The time taken to familiarise with the GAR guidance document is the same as for private business flights.

¹⁴ Reading Soft, <http://www.readingsoft.com/>

¹⁵ASHE 2020;

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/occupation4digitsoc2010ashetable14>

¹⁶ Eurostat data, 2018, <https://ec.europa.eu/eurostat/web/labour-market/labour-costs>

¹⁷ HM Treasury; <https://www.gov.uk/government/statistics/gdp-deflators-at-market-prices-and-money-gdp-march-2021-budget>

- The monetised opportunity cost of forgoing leisure time for a private individual is £7.52 per hour. This is based on DfT's estimation of the market price for non-working time¹⁸, modified to take into account real GDP growth since its publication.

33. Private leisure familiarisation costs are estimated as:

volume of private leisure pilots x (time taken to read the revised guidance (hrs) + time taken to register on the GAR portal (hrs)) x monetised opportunity cost (£/hr).

34. The estimated familiarisation cost to leisure pilots lies in a range of **£0.0 to £0.1 million**, with a central estimate of **£0.1 million** (2020 prices) in year 1 only.

Public sector

35. It is estimated that there will be a small public-sector familiarisation cost. The precise assumptions are detailed in **Table A.1**. The cost is calculated as

volume of BF Officers currently employed x time taken to read the guidance (hrs) x gross BF officer wage (£/hr)

36. The cost is estimated in a range of **£0.0 to £0.01 million**, with a central estimate of **£0.0 million** (2020 prices) in year 1. This familiarisation cost is low because the guidance document for BF officers is significantly shorter in length than that for pilots and FBOs. As with the private sector, there are no familiarisation costs in subsequent years as this new guidance replaces old guidance, with no net increase in training required

Total set-up costs

Option 2

37. Familiarisation only occurs in year 1. In years 2 to 10 there are no familiarisation costs. This is because the guidance is not expected to change annually and so the guidance need not be re-read after year 1. The updated guidance replaces old guidance and so it is assumed that there will be no overall effect on training time for new pilots. **Total set up costs** are estimated to be lie in the range of **£0.3 to £1.0 million**, with a central estimate of **£0.6 million** (2020 prices) in year 1 only.

Option 3

38. Familiarisation costs for **Option 3** are calculated in the same way as in **Option 2**. It is assumed that the guidance is the same length in both options and that setting up the portal takes the same amount of time. The total familiarisation costs for **Option 3** are estimated to be between **£0.3 and £1.0 million**, with a central estimate of **£0.6 million** in year 1 only.

39. It is assumed that to serve the six-monthly requirement, a database of pilot information is required which creates additional set-up costs. This is split between UK and non-UK pilots.

UK pilots:

40. It is assumed that the CAA is able to provide BF with a list of all GA pilots with a valid licence. This list should therefore capture all pilots who potentially may wish to fly internationally within the next six months. This will be stored on a database along with the pilot's licence number and e-mail address, which is used to serve the requirement. The Home Office Digital Data and Technology Directorate (DDaT) indicated that costs can vary depending on precise business needs and whether

¹⁸ Source: Value of Time and Vehicle Operating Costs (2014) January), Department for Transport http://webarchive.nationalarchives.gov.uk/20140304110038/http://www.dft.gov.uk/webtag/documents/expert/pdf/U3_5_6-Jan-2014.pdf

a Commercial Off-The Shelf (COTS) or bespoke product is used. This is reflected in the range of database set-up costs. Consistent with the Government's 'digital by default' strategy, it is understood that as more pilots get their GA licences, these will be added to the database automatically so will not require additional labour efforts. If **Option 3** is carried forward, then a discovery phase will be set up to establish the precise requirements and options. However, DDaT provided a probable cost range of £25,000 to £100,000, with a central estimate estimate of £50,000 to set up this database. This is an additional set up cost that occurs in year 1 only.

Non-UK pilots:

41. Under **Option 3**, BF would also have to serve the requirement on non-UK pilots who may within the subsequent six months wish to fly to the UK. Following discussions with BF operational colleagues, there are several complex issues to be resolved with **Option 3**. Whilst some records are held by BF, based on previous GARs submitted, and these could be added to the database, there is likely no possible way for BF to identify every non-UK-based pilot globally with a GA licence who may at some point wish to travel to the UK. To even attempt to would be highly labour intensive and require a significant expansion of BF resources, putting a significant burden on the UK taxpayer. Therefore, serving the six-monthly requirement on non-UK pilots has not been costed in this impact assessment (IA) due to the complexity of arrangements that would be required to enact such a change.

Total set-up costs for Option 3

42. The **total set-up costs** for **Option 3** are within a range of **£0.3 to £1.1 million**, with a central estimate of **£0.7 million** (2020 prices) and occur in year 1 only.

Option 4

43. Set-up costs for **Option 4** are estimated the same way as **Option 2**, however, it is assumed that only **compliant** private business pilots, FBOs and private leisure pilots will read the guidance and register for the portal. Compliance rates are assumed to remain unchanged following the introduction of **Option 4**; that 95, 90 and 85 per cent of pilots comply in the low, central and high scenarios respectively.

Private business flights

44. For **Option 4**, private business familiarisation costs are calculated as:

(Volume of employees x compliance percentage) x (time taken to read the guidance (hrs) + time taken to register on the GAR portal (hrs)) x gross wage (£/hr).

45. This results in an estimate of private business flights familiarisation costs as in a range of **£0.3 to £0.8 million**, with a central estimate of **£0.5 million** (2020 prices) in year 1 only.

Private leisure flights

46. Similarly, private leisure familiarisation costs are estimated as:

(Volume of private leisure pilots x compliance percentage) x (time taken to read the revised guidance (hrs) + time taken to register on the GAR portal (hrs)) x monetised opportunity cost (£/hr).

47. For **Option 4**, estimates range from **£0.0 to £0.1 million**, with a central estimate of **£0.0 million** (2020 prices) in year 1 only.

Public sector

48. The public sector cost is calculated the same way as in **Option 2** and is estimated to be in the range of **£0.0 to £0.01 million** (2020 prices). All public sector employees are expected to read the guidance in **Options 2 and 3**.

Total set-up costs for Option 4

49. Total familiarisation costs are estimated to lie in a range of **£0.3 to £0.9 million**, with a central estimate of **£0.5 million** (2020 prices) in year 1 only.

Ongoing costs

Option 2

Private business flights

50. Those who do not currently provide information as per the existing guidance may face additional costs in submitting information online. It is assumed that those who do not provide information voluntarily will adjust their behaviour after the legislation is enacted and the required information will be submitted electronically for all international flights. It is estimated that for 10 per cent of flights no GAR is submitted, with a range of 5 to 15 per cent used in the low and high scenarios. Considering the proportion of business flights (67%) and UK based operations (50%) it is estimated there may be additional costs affecting between 1,000 to 15,000 flights per year.
51. Online methods of data submission require information about the flight and persons on board and is similar to the current form which is widely used throughout the sector. Information submitted online will be used for policing, immigration and customs purposes. It is estimated that it would take between 5 and 15 minutes to complete and BF has developed a free to use GA portal (submit-a-GAR) to ensure that information can be provided easily and quickly. Due to the broad range of the GA sector, which includes large multinational companies and small firms, a range of employees will be responsible for providing advance information. Pilots and FBOs provide information but there is no data on the share of this work. The assumption used here is that the work is shared 50:50 for business GA flights in the central estimate. It is assumed that FBOs complete the GAR 60 per cent of the time in the low scenario and 40 per cent in the high scenario.
52. Pilots and operators are already required to submit flight plans electronically to the National Air Traffic Services (NATs). The Home Office will require operators to submit information about the flight and persons on board online. While most of those affected will already have access to the internet, enabling online submission, it is still estimated that there will be additional costs associated with accessing the portal. These assumptions suggest that there may be additional compliance costs of around £29,000 per year (this is the value to business GA of the time lost in entering information into the online portal). Over 10 years, the cost is estimated to lie in a range of **£0.0 to £1.2 million (PV)**, with a central estimate of **£0.3 million (PV)**. **Table A.1** in **Annex 1** presents the assumptions used in these estimates.

Private leisure flights

53. Similarly to private business flights, those who do not currently submit a GAR (between 5 per cent and 15 per cent of private leisure GA flights) may incur additional costs in complying with the proposed legislation. It is estimated that between 580 and 7,500 private leisure flights may face additional costs. The estimated additional annual compliance cost is in the range of **£0.0 to £0.1 million (PV)** over 10 years, with a central estimate of **£0.0 million (PV)**. **Table A.1** presents the assumptions used in these estimates.

Public sector

54. As the provision of information becomes compulsory the burden of processing the previously missing information from the estimated 10 per cent of GA flights that do not currently submit information will fall on BF. The cost of processing this additional burden will be offset by the provision of information moving to a purpose built online portal.

Civil penalty

55. There may be some pilots / owners and operators who still do not submit online data. They may face a civil penalty under the proposed legislation if they continue to fail to do so. Any penalty will fall on non-compliant organisations or individuals, and is therefore not considered as a cost or in the Net Present Social Value (NPSV) nor in the Business NPV (BNPV). There is no estimate of the likely impact of the penalty as there is insufficient information. The civil penalty regime will be run in a similar way to the existing arrangements for scheduled commercial aviation. Under this regime, the Home Office works collaboratively with the sector to resolve problems with advance information before civil penalties are imposed.

Enforcement costs

56. This assessment does not include any additional enforcement costs because it is not anticipated that there will be any increase in enforcement activity.

Indirect costs

57. It is not anticipated that there will be any additional indirect costs associated with the proposed policy change.

Total ongoing costs

58. The total ongoing costs for **Option 2** are expected to lie in a range of **£0.0 to £1.2 million (PV)** over 10 years, with a central estimate of **£0.3 million (PV)** over the same time period.

Total costs for Option 2

59. **Total costs** are estimated to be in the range of **£0.3 to £2.2 million (PV)**, with a central estimate of **£0.9 million** over 10 years.

Option 3

Total ongoing costs

60. The **ongoing costs for Option 3** are estimated in the same ways as **Option 2**. These are expected to lie in a range of **£0.0 to £1.2 million (PV)**, with a central estimate of **£0.3 million (PV)** over 10 years.
61. There is an additional hypothetical ongoing cost for continuing to identify any new GA pilots, owners or operators globally who may wish to travel to the UK in the subsequent six months. However, as discussed in the set-up costs for **Option 2**, this is probably unworkable for BF and has not been costed due to the lack of data on how this would be implemented.
62. The same assumptions are made regarding public sector costs, civil penalties, enforcement costs and indirect costs as in **Option 2**.

Total costs for Option 3

63. The **total cost for Option 3** is estimated to lie in a range of **£0.4 to £2.3 million (PV)**, with a central estimate of **£0.9 million (PV)** over 10 years.

Option 4

Total ongoing costs

64. Since compliance is not compulsory for **Option 4**, it is assumed that compliance rates remain the same as at present. There are no additional costs neither to business nor leisure pilots who do not currently comply with the regulations. Ongoing costs for those who do currently comply remain the same as at this time. Compliant pilots, owners or operators face no additional costs. The ongoing costs for **Option 3** are **£0.0 million (PV)**.
65. There is no expected impact on public sector costs, civil penalties, enforcement costs and indirect costs.

Total costs for Option 3

66. The **total cost for Option 3** is estimated to lie in a range of **£0.3 to £0.9 million (PV)**, with a central estimate of **£0.5 million (PV)** over 10 years.

BENEFITS

Option 2

Set-up benefits

67. There are no set-up benefits expected to arise from this option.

Ongoing benefits

Direct benefits

68. The proposed policy will fill a significant information gap facilitating BF's provision of an accurate, proportionate and effective risk-led operational response to GA. It is not anticipated that this policy will have any direct monetised benefits.

Indirect benefits

69. The main indirect benefits of this option are improved monitoring of individuals on board GA flights and the associated mitigation of safety and security risks which could otherwise have considerable human and financial costs. Border Force uses data to make risk-based decisions around which flights should be met on arrival, with particular focus on those who seek to cause harm and are a risk to UK security. With improved information requirements for GA flights, BF will have better data with which to decide upon the best use of resources.
70. The current approach to submitting a GAR results in data gaps. It is expected that those with unlawful intent would exploit any vulnerability in the system, making GA an attractive prospect for criminals.
71. Border Force has evidence that for a fifteen-month period in 2019/20 there were 7,468 inaccurate GARs submitted. Of these, action was taken against 561 persons. Usually, these were instances in which the flight was met by BF, and on examination of the documents it was found that passenger information had been entered incorrectly. While these were most often genuine errors, this

demonstrates how passenger information could be deliberately manipulated in an attempt to conceal the identity of a passenger, or the fact that the documents used are stolen. These data do not include instances for which no GAR was submitted at all. This poses a significant threat to national security. By requiring an electronic method of submitting a GAR, there should be a reduction in errors and attempts at deception should be flagged, resulting in better immigration control and security benefits at the UK border.

72. The range of the benefits is likely to be wide, including for high harm crimes such as people trafficking, and very low probability but very high impact events, such as terrorist attacks. Given the low cost of introducing these measures, for illustrative purposes the economic and social cost of serious harms such as modern slavery can be examined. While BF does not have specific data on the number of people who are trafficked through GA into the UK, it is reasonable to assume that the lack of on-arrival checks by BF may make GA attractive to human traffickers (compared to a scheduled flight). It is not possible to accurately estimate the number of crimes that would be prevented by the introduction of GA regulations. However, for the purpose of comparison, the cost to society of human trafficking is estimated to be £304,575¹⁹. This means that for **Options 2 and 3**, three instances of human trafficking would need to be avoided for the benefits to outweigh the costs (in line with central estimates). In **Option 4**, two instances would need to be prevented. This is assuming that there are no other benefits as a result of the policy.
73. Individuals involved in terrorism-related activities could seek to use GA flights as a means for entering or exiting the UK. Between 2004 and 2016, the UK is estimated to have lost €43.7 billion (approximately £33.6 billion)²⁰ in GDP as a result of terror attacks. Direct costs of terrorism include the costs of casualties, destruction of property, costs to emergency services and to the criminal justice system (CJS). There is substantial variation in the cost of individual terror attacks due to scope, with attacks that result in loss of life bearing a greater cost than failed attacks or attacks that result just in destruction of property. Nevertheless, terrorism is a high cost crime and so stopping a single attack is likely to outweigh the cost of the policy. The risk of terrorism attributed to individuals arriving on GA flights is perceived to be very low as there are currently no known connected instances. However, requiring information about the flight and persons on board means that BF can check individuals entering the country and identify any potential threats. All necessary mitigation measures can then proceed. For terror risks, this is a preventative policy that closes a gap in the security system that otherwise may be exploited in the future.
74. GA flights have also been used to smuggle illegal drugs into the UK. The exact prevalence rate is unknown, but BF acknowledge that it may be more widespread than they are currently aware due to the relative ease with which GA flights can arrive and be subject to less scrutiny than arriving scheduled flights. This suggests that the current system may be being exploited for criminal intent. For the financial year 2015/16, the Home Office estimated that the economic and social cost of drug crime was approximately £20 billion²¹. This takes into account, arrests and prosecutions, healthcare costs and the cost of drug-related fatalities. It is not possible to apportion this figure into cost per drug crime, nor drugs supplied specifically through GA. However, it demonstrates that drug-related incidents pose a significant cost to the UK tax payer. The introduction of an online requirement to submit information about the flight and persons on board in advance will enable BF to better identify suspicious GA activity, which may lead to an increase in drug seizures and arrests of individuals involved in the importation of illegal substances, reducing the drug supply entering the UK. As a caveat to this, while it is assumed that a reduction in the volume of illegal substances coming across the border is beneficial, a decrease in the drug supply may also have an associated cost. Reduction in supply leads to an increase in the street price of the drug. Individuals dependent on drugs may

¹⁹ Home Office:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/782656/understanding-organised-crime-mar16-horr103-2nd.pdf

²⁰ RAND: <https://www.rand.org/randeurope/research/projects/the-cost-of-terrorism-in-europe.html>

²¹ Home Office:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/782656/understanding-organised-crime-mar16-horr103-2nd.pdf

then commit crimes (for example, theft) to fund that habit. Nevertheless, when including the potential reductions in drug-related deaths (and associated medical costs), it is likely that the benefits of a reduced drug supply will outweigh the costs.

Total benefits

75. Due to the difficulty in assigning a monetary value to security benefits, the total benefits of the proposed regulation have not been monetised.

Options 3

No benefits have been monetised for **Option 3**. The same assumptions regarding benefits for **Options 3** are made as for **Option 2**. However, this is dependent on BF being able to identify all non-UK pilots, owners or operators who may wish to travel to the UK in the subsequent six months. As this has been established as likely to be unviable, **Option 3** will almost certainly not offer the same level of security benefits as **Option 2** as there will still be the possibility that GA flights from foreign operators can enter the UK without submitting the required information. The benefits of having an electronic system will however persist.

Option 4

76. No benefits have been monetised for **Option 4**. It probably does not offer the same benefits as **Option 2**. This is because submitting a GAR remains voluntary and so the data gap will likely still exist and BF will not have complete information with which to decide on risk-based operations. There may not be the same improvement in public safety. There may be a small direct benefit of moving all GARs received to an electronic system which may make processing easier for BF.

NPSV, BNPV, EANDCB

Table 1, Summary monetised benefits, costs, NPSV, BNPV and EANDCB, 2020 prices, £ million (10 yr PV).

£ million (10 yr PV)	Low Cost	Central Estimate	High Cost	
Option 1				
Total Benefits	0.0	0.0	0.0	PV
Total Set-up Cost	0.3	0.6	1.0	PV
Total Ongoing Cost	0.0	0.3	1.2	PV
Total business cost	0.3	0.8	2.0	PV
Total cost	0.3	0.9	2.2	PV
NPSV	-0.3	-0.9	-2.2	
BNPV	-0.3	-0.8	-2.0	
EANCB (BIT)	0.0	0.1	0.2	2020 prices
Option 2				
Total Benefits	0.0	0.0	0.0	PV
Total Set-up Cost	0.3	0.7	1.1	PV
Total Ongoing Cost	0.0	0.3	1.2	PV
Total business cost	0.3	0.8	2.0	PV
Total cost	0.4	0.9	2.3	PV
NPSV	-0.4	-0.9	-2.3	
BNPV	-0.3	-0.8	-2.0	
EANCB (BIT)	0.0	0.1	0.2	2020 prices
Option 3				
Total Benefits	0.0	0.0	0.0	PV
Total Familiarisation Cost	0.3	0.5	0.9	PV
Total Compliance Cost	0.0	0.0	0.0	PV
Total business cost	0.3	0.5	0.8	PV
Total cost	0.3	0.5	0.9	PV
NPSV	-0.3	-0.5	-0.9	
BNPV	-0.3	-0.5	-0.8	
EANCB (BIT)	0.0	0.1	0.1	2020 prices

Source: Home Office, own estimates, March 2021.

Total costs, benefits, NPSV, BNPV and EANDCB

Option 2

77. The set-up cost is estimated to be in a range of **£0.3 to £1.0 million**, with a central estimate of **£0.6 million** (2020 prices) in year 1 only. The ongoing costs are estimated to be in a range of **£0.0 to £1.2 million (PV)**, with a central estimate of **£0.3 million (PV)** over 10 years. The **total cost of Option 2** is estimated in a range of **£0.3 to £2.2 million (PV)**, with a central estimate of **£0.9 million**

(PV) over 10 years. The **total cost to business** of this policy is estimated to be in the range of **£0.3 to £2.0 million (PV)**, with a central estimate of **£0.8 million (PV)** over 10 years.

78. The **Net Present Social Value (NPSV)** is estimated to be in the range of **-£0.3 to -£2.2 million**, with a central estimate of **-£0.9 million (PV)** over 10 years. The **Business Net Present Value (BNPV)** is in a range of **-0.3 to -£2.0 million (PV)**, with a central estimate of **-£0.8 million** over 10 years. The **net cost to business per year** expressed as the Equivalent Annual Net Direct Cost to Business (**EANDCB**) is **£0.1 million**. In the high scenario the **EANDCB** increases to **£0.2 million** per year.

Option 3

79. The set-up cost is estimated to be in a range of **£0.3 to £1.1 million**, with a central estimate of **£0.7 million** in year 1 only. The ongoing costs are estimated to be in a range of **£0.0 to £1.2 million (PV)**, with a central estimate of **£0.3 million (PV)** over 10 years. The **total cost of Option 3** is estimated in a range of **£0.4 to £2.4 million (PV)**, with a central estimate of **£0.9 million (PV)** over 10 years. The **total cost to business** of this policy is estimated to be in the range of **£0.3 to £2.0 million (PV)**, with a central estimate of **£0.8 million (PV)** over 10 years.
80. The **Net Present Social Value (NPSV)** is estimated to be in the range of **-£0.4 to -£2.4 million**, with a central estimate of **-£0.8 million** over 10 years. The **Business Net Present Value (BNPV)** is in a range of **-£0.3 to -£2.0 million (PV)**, with a central estimate of **-£0.8 million** over 10 years. The central estimate of the **net direct cost to business** is **£0.1 million**, increasing to **£0.2 million** in the high scenario.

Option 4

81. The set-up cost is estimated to be in a range of **£0.3 to £0.9 million**, with a central estimate of **£0.5 million** in year 1 only. There are no ongoing costs arising from **Option 4**. The **total cost of Option 4** is estimated in a range of **£0.3 to £0.9 million (PV)**, with a central estimate of **£0.5 million (PV)** over 10 years. The **total cost to business** of **Option 4** is estimated to be in the range of **£0.3 to £0.8 million (PV)**, with a central estimate of **£0.5 million (PV)** over 10 years.
82. The **NPSV** is estimated to be in the range of **-£0.3 to -£0.9 million (PV)**, with a central estimate of **-£0.5 million** over 10 years. The **BNPV** is in a range of **-£0.3 to -£0.8 million (PV)**, with a central estimate of **-£0.5 million** over 10 years. The **EANDCB** is estimated to be **£0.1 million**.

Value for money (VfM)

83. For a policy to be considered VfM, it must achieve the strategic and policy objectives. Of the options considered in this IA, **Options 3 and 4** are the least likely to fully meet the policy and strategic objectives. Therefore, they are less likely to be value for money, compared with **Option 2**.
84. **Option 3** may be impractical as it would be challenging to identify all the international pilots, owners or operators who may at some point wish to travel to the UK in order to serve the legal requirement to provide passenger information. If the required information is not submitted then the policy objectives are not fully met and the information gap means that security risks persist. The strategic objective of strengthening the border against threats is will not be fully realised. Even attempting to identify all international pilots, owners or operators who may wish to travel to the UK would be an incredibly labour-intensive task. Border Force may have to expand its resources considerably. This would result in a considerable increase in public sector costs compared to **Options 2 and 4**. Therefore, **Option 3** is weaker regarding VfM.
85. **Option 4** achieves an electronic system with which to process all GARs received by BF. However, it allows for a voluntary arrangement to remain. The over-arching strategic objectives are unlikely to be met as the data gap remains. It is almost certain that any GA pilot who has criminal intent will

continue to fail to comply and submit information to BF. This means that **Option 4** does not solve the problem that this regulation is trying to address. Thus, **Option 4** is not good VfM.

86. **Option 2** represents good VfM as it most effectively meets the policy and strategic objectives. BF will have better information with which to address criminal activity connected to GA. Crime reduction is expected to have a positive effect on the social welfare of UK residents. The costs of this policy are borne by the Home Office and the GA pilots and the benefits accrue to UK residents from increased public safety and crime reduction. In turn, the public sector may achieve cost-savings from a reduction in the associated costs of crimes currently facilitated by GA. For example, if there is a reduction in the drug supply in the country and this has a direct effect on the number of incidents of illegal drug misuse, this could result in cost-savings to the health service and the police. However, a reduction in the drug supply could lead to unintended consequences. If the supply is significantly reduced, the street price may increase. Individuals dependent on illegal substances may then turn to other forms of crime (such as theft) to fund their habit when the price is increased. This could reduce the benefits accruing to the public sector. Nevertheless, it is likely that the benefits will still outweigh the costs of this policy.

Place-based analysis

87. Place-based analysis has not been conducted for this IA. This is because there are GA aerodromes and pilots across the whole of the UK. None of the options considered are expected to have disproportionate impacts on any one area.

Impact on small and micro-businesses

88. Business GA includes all unscheduled business and commercial flights, for example, business' own private jets or private aircrafts charter. The Business Population Estimates (BEIS) do not meet the purpose of this analysis as the sector 'transport and storage' is too broad. The Office for National Statistics (ONS) estimate that in 2020 there were 535 businesses operating both scheduled and unscheduled passenger air transport in the UK, with over 90 per cent in the small and micro-business (SMBs) category²².
89. The main premise of this regulation is to mitigate security risks arising from data being submitted in formats that preclude automated checking and the resulting impact that has on BF operations. Additionally it is to ensure the compliance of all GA pilots, owners or operators making international flights to and from the UK to ensure complete coverage of border movements and the ability to identify individuals seeking to evade detection. Exemptions for SMBs would allow an avenue for illegal activities for a large share of businesses for whom the regulation is intended, meaning the benefits of the regulation would be lost. An exemption for SMBs is not recommended in this instance.
90. Over a 10-year period, the business compliance costs of the new regulation are small (£0.3m PV) and should not be disproportionately burdensome on SMBs. The costs to SMBs of the new proposed regulation are somewhat mitigated by the provision of guidance and information so that pilots, owners and operators can easily understand their new requirements. It is not viable to mitigate the remaining costs incurred by SMBs as the remaining costs are the reading of the guidance and the submission of information about the flight and persons on board into the online portal. Also, SaMBs in the aviation sector operate under a regulated environment and therefore are used to regulation and how to factor for it. The burden on SMBs is not considered to be overly onerous.

²² [UK business: activity, size and location - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/businessandindustry/sectors/transportandstorage)

F. Proportionality

91. The proposed change in GA reporting requirements is not expected to place a large burden on business or BF. The impact will be minimal on those who comply with the CDs. The level of analysis presented in this IA is considered proportionate to the policy change.

G. Risks

92. **Number of international GA flights:** There is no systematic data available of the total number of international GA flights affected. However, management information suggests that there may be around 125,000 flights to and from the UK per year. The available data on international GA flights is very limited due to the highly-segmented structure of the sector. This has meant that uncertain assumptions have been used in the analysis, which is reflected in the wide estimated ranges for the estimated costs of the policy recommendation. Sensitivity analysis below tests the robustness of the estimates used in the main analysis.
93. **Leisure flights:** It is likely a significant number of these flights are leisure flights and involve a pilot flying with their family or friends. These types of flights are not considered to be a business and their costs have not been considered as part of the EANDCB. The CAA's strategic review of GA suggests that around two-thirds of flying hours are for business reasons. It is assumed that 67 per cent of GA flights are business flights. However, if this percentage is too high (low) then it is possible that the impact on business has been over (under) estimated.
94. **Foreign operators:** In line with the HM Treasury Green Book guidance (2020)²³, only costs to UK pilots, owners and operators have been considered. There will be GA flights to and from the UK by overseas pilots, owners and operators. The proportion of overseas operators is not known. It is assumed to be between 25 and 75 per cent with a central estimate of 50 per cent. The range is large to demonstrate the uncertainty of this assumption and the true cost to UK pilots / operatives is unknown.
95. **Analytical risks:** The assumptions regarding the proportion of business flyers, and the number of aircraft affected are based on the 2006 CAA review of GA. Another review has not been completed since then and as such these assumptions may now be out of date. Some assumptions are simply unknown. For example, the proportion of FBOs who register for the portal on behalf of the pilot and the number of flights that can be scheduled six months in advance are unknown. To account for the uncertainty, sensitivity analysis has been performed over a large range. However, going forward further evidence regarding these assumptions will be required.

Unintended consequences

96. There is a risk that this regulation will push serious and organised criminals currently exploiting GA to find new avenues to evade border security that are harder to detect.
97. As caveated in the benefits section, if this regulation has a serious restrictive impact on the UK drug supply and this increases the street price of said drugs, consequently there may be an increase in acquisitive crimes, such as theft, as dependent individuals resort to illegal activities to fund their habit. However, this would require a significant decrease in the illegal drugs entering the UK and the overall benefits of restricting the drug supply are still expected to outweigh potential costs.

²³ HM Treasury (2020):

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/685903/The_Green_Book.pdf

Sensitivity analysis

98. There is significant uncertainty regarding the volume of international GA flights since pilots, owners or operators are not obligated to register the flight with BF. There is a possibility that the flight volumes estimated in this IA are significantly lower than the true volumes. Sensitivity analysis has been conducted to establish the impact on costs if the true volumes are considerably higher than the estimates presented in the main analysis.
99. For the purposes of sensitivity analysis, it is assumed that the true volume is 25 per cent higher than the high estimate (200,000) detailed in this IA, making it 250,000. For **Option 2**, the costs are now in a range of **£0.4 to £2.6 million (PV)**, with a central estimate of **£1.0 million (PV)** over 10 years. The central estimate is 15 per cent higher than the best estimate with current volume assumptions. This demonstrates that the analysis is sensitive to volume of international GA flights. However, it also reveals that even if the volume is significantly higher than expected, the costs are still relatively low.
100. For **Option 3**, the costs are now in a range of **£0.4 to £2.7 million (PV)**, with a central estimate of **£1.1 million (PV)** over 10 years.
101. For **Option 4**, the costs do not change as the costs here are not driven by flight volumes.
102. Another area of uncertainty in the analysis is the split between FBOs and business pilots filling in the GAR. Due to lack of data, in the main analysis it is considered to be a 50:50 split in the central scenario. This assumption is tested. here If the GAR is filled in by FBOs 100 per cent of the time, then the cost for **Option 2** is **£0.2 to £1.1 million (PV)**, with a central estimate of **£0.4 million** over 10 years. Alternatively, if the pilot fills in the GAR 100 per cent of the time then the total cost (PV) is within a range of **£0.6 to £3.0 million (PV)**, with a central estimate of **£1.3 million(PV)** over 10 years.
103. Similarly, if the GAR is filled in by FBOs 100 per cent of the time, then the cost for **Option 3** is **£0.2 to £1.2 million (PV)**, with a central estimate of **£0.5 million** over 10 years. Alternatively, if the pilot fills in the GAR 100 per cent of the time then the total cost is within a range of **£0.6 to £3.1 million (PV)**, with a central estimate of **£1.4 million (PV)** over 10 years. This demonstrates that the analysis is highly sensitive to the split of duties, owing to the considerable difference in wage for an FBO compared to a pilot. Therefore, further evidence needs to be gathered to influence this assumption.
104. For **Option 4** there is no difference in costs.

Scenario analysis

105. The main body of this IA has not considered the impact of COVID-19 on GA flight volumes. This is due to the significant uncertainty regarding its long-term affect on GA. However, the COVID-19 scenario is considered here assuming that 2023 is the year of implementation.
106. In 2020, data collected by the CAA demonstrated that there was a 63 per cent decrease in all flight activity across UK reporting airports compared to 2019²⁴. This data is not disaggregated into commercial versus GA flights, but it is assumed for the purposes of this analysis that both sectors experienced the same percentile drop in activity. The International Air Transport Association (IATA) predicted a gradual recovery for international travel, with global flight activity not rebounding to pre-pandemic levels until 2024²⁵. Again, this is not specific to GA, but it is assumed that GA follows a similar trend to commercial aviation.
107. The scenario analysis adopts a similar assumption to the IATA regarding sector recovery following COVID-19. **Table 2** presents GA flight volumes making a gradual recovery until reaching current volume estimates in 2024. The estimated recovery is consistent with other Home Office approaches.

²⁴ CAA: <https://www.caa.co.uk/Data-and-analysis/UK-aviation-market/Airports/Datasets/UK-Airport-data/Airport-data-2020-01/>

²⁵ IATA: <https://www.iata.org/en/pressroom/pr/2020-07-28-02/>

However it should be noted that the adjustments used in this scenario analysis are purely indicative and may not represent the true long-term impact of COVID-19 on GA flight volumes.

Table 2, Estimated number of GA flights for the appraisal period 2021 to 2030 adjusted for the effects of COVID-19.

	2021	2022	2023	2024	2025 onwards
COVID-19 adjusted number of flights	116,000	143,000	163,000	170,000	170,000

Source: Home Office internal analysis, rounded to 3 significant figures.

108. For **Option 2**, the total cost using the COVID-19 adjusted flight volumes and all other central estimates is **£0.9 million** (PV, 2020 prices) over 10 years. The **NPSV** is **-£0.9 million** (PV) over 10 years. There has been a negligible decrease in costs using the volume adjustments. The **BNPV** and **EANDCB** also showed a marginal decrease.
109. For **Option 3**, the total cost is **£0.9 million (PV)** over 10 years and the **NPSV** is **-£0.9 million**. As in **Option 2**, there has been a negligible decrease in the costs associated with the option.
110. For **Option 4**, there has been no change in costs or the **NPSV** from the main analysis in the IA. This is because **Option 4** costs are not affected by flight volumes, only by the volume of pilots. It is assumed that COVID-19 has had no effect on the volume of GA pilots.
111. The scenario analysis demonstrates that even if, as a result of the pandemic, the GA flight volumes take longer to recover, this will only have a marginal impact on the cost and **NPSV**. Therefore, the estimates presented in the main body of the analysis are robust to the effects of COVID-19.

H. Direct costs and benefits to business calculations

Table 3: Total costs and benefits, NPSV, BNPV and EANDCB, £ million, 2020.

Option 2

Costs and benefits	Low	Central	High
Total set-up costs	£0.3	£0.6	£1.0
Ongoing costs			
Business Pilots	£0.0	£0.2	£0.9
FBOs	£0.0	£0.1	£0.2
Leisure Pilots	£0.0	£0.0	£0.1
Total ongoing costs	£0.0	£0.3	£1.2
Total cost	£0.3	£0.9	£2.2
Benefits			
Total benefit	£0.0	£0.0	£0.0
NPSV	-£0.3	-£0.9	-£2.2
BNPV	-£0.3	-£0.8	-£2.0
EANDCB	£0.0	£0.1	£0.2

Note: figures may not sum due to rounding

Option 3

Costs and benefits	Low	Central	High
Total set-up costs	£0.3	£0.7	£1.1
Ongoing costs			
Business Pilots	£0.0	£0.2	£0.9
FBOs	£0.0	£0.1	£0.2
Leisure Pilots	£0.0	£0.0	£0.1
Total ongoing costs	£0.0	£0.3	£1.2
Total cost	£0.4	£0.9	£2.3
Benefits			
Total benefit	£0.0	£0.0	£0.0
NPSV	-£0.4	-£0.9	-£2.3
BNPV	-£0.3	-£0.8	-£2.0
EANDCB	£0.0	£0.1	£0.2

Note: figures may not sum due to rounding

Option 4

Costs and benefits	Low	Central	High
Total set-up costs	£0.3	£0.5	£0.9
Ongoing costs			
Business Pilots	£0.0	£0.0	£0.0
FBOs	£0.0	£0.0	£0.0
Leisure Pilots	£0.0	£0.0	£0.0
Total ongoing costs	£0.0	£0.0	£0.0
Total cost	£0.3	£0.5	£0.9
Benefits			
Total benefit	£0.0	£0.0	£0.0
NPSV	-£0.3	-£0.5	-£0.9
BNPV	-£0.3	-£0.5	-£0.8
EANDCB	£0.0	£0.1	£0.1

Note: figures may not sum due to rounding

I. Wider impacts

112. It is not anticipated there will be any wider impact effects associated with this policy change.

J. Trade impact

113. Potential impacts to trade should be minimal as all GA pilots, owners or operatives should already be complying with the requirements of the CDs and be submitting GARs for all international flights. Where the proposals mean GA pilots, owners or operatives have to change their reporting method it is still expected that the impact will be minimal as they will be able to save their details into the system to allow for quicker and easier submission of data.

K. Monitoring and evaluation (PIR), enforcement principles

114. It is expected that should the regulations be implemented, it will be in line with the Government's common commencement dates (CCD)²⁶. Should the regulations be introduced information will be collected on their use and the success of the regulations will be monitored in a number of ways:
- It will be monitored for compliance with operational colleagues in BF to ensure that information about the flight and persons on board is being submitted online.
 - A civil penalty regime will be introduced that will ensure a consistent approach to the application of fines for non-compliance across the UK and monitor how any fines are applied and that this system is consistent with the Macrory Principles²⁷.
115. Working with operational and analytical colleagues, an informal review of the regulations will take place one year following their implementation to ensure that the policy goals have been achieved.

²⁶ These are normally 6 April and 1 October in any year to given business some certainty about when regulations will be implemented.

²⁷ Better Regulation Executive and The Cabinet Office (2006) *Regulatory Justice: Making Sanctions Effective*, Final Report, Professor Richard B Macrory, November, London. see: https://www.regulation.org.uk/library/2006_macrory_report.pdf

L. Annex 1, Table of GA data (L, C and H scenarios), 2022.

Table A.1, GA data for Option 2, assumptions and estimated costs (PV = 2020 prices)

Description	Low	Central	High	Source
GA employment	9,700	9,700	9,700	GA Economic Research Study
Private Familiarisation Costs				
<u>FBO checking staff (%)</u>	10%	20%	30%	Assumption based on ground handler information.
FBO employment volume	950	1,950	2,900	Estimate
Gross wage (uplift 22%)	£13.54	£13.54	£13.54	ASHE 2020, Table 14.5a, gross per hour
Familiarisation time, guidance (hours)	0.10	0.23	0.42	Assumption (Border Force & reading table)
Familiarisation time, portal registration (hrs*0.5)	0.25	0.38	0.50	Assumption
Familiarisation cost (FBO)	£0.01	£0.02	£0.03	Estimate
<u>GA business pilots</u>	17,831	17,831	17,831	CAA email, 8/05/19
Gross wage (uplift 22%)	£48.33	£48.33	£48.33	ASHE 2019, Table 14.5a, per hour put into 2020 prices using GDP deflator
Familiarisation time, guidance (hours)	0.10	0.23	0.42	Assumption (BF & reading table)
Familiarisation time, portal registration (hrs*0.5)	0.25	0.38	0.50	Assumption
Familiarisation cost (pilots)	£0.26	£0.52	£0.88	Estimate
Familiarisation Cost (business)	£0.26	£0.54	£0.91	Estimate (Year 1 only)
<u>GA leisure pilots</u>	8,900	8,900	8,900	CAA email, 8/05/19
Gross wage	7.52	7.52	7.52	DfT modified for 2020 prices and
Familiarisation time, guidance (hrs)	0.50	0.75	1.00	Assumption (Border Force & reading table)
Familiarisation time, portal registration (hrs)	0.10	0.23	0.42	Assumption
Familiarisation cost (leisure)	£0.04	£0.07	£0.09	Estimate (Year 1 only)
Familiarisation Cost (Private)	£0.31	£0.61	£1.01	Estimate (Year 1 only)
Public sector familiarisation				
BF officer time (hours)	0.01	0.02	0.05	Border Force time to read Operational Instruction (300 words)
BF officer wage (resource cost)	£31.71	£31.71	£31.71	BFO Opportunity Cost, Home Office
Familiarisation cost (BF)	£0.00	£0.00	£0.01	Estimate
Familiarisation cost (public)	£0.00	£0.00	£0.01	Estimate (Year 1 only)
Total Familiarisation cost	£0.31	£0.61	£1.02	Estimate (Year 1 only)
Private business ongoing costs	Low	Central	High	Source
GA Flights per year	140,000	170,000	200,000	CAA and DfT, uplifted to account for unreported flights.
Business flights (%)	0.67	0.67	0.67	CAA Strategic Review of General Aviation (2006) July, London.
Business flights	93,333	113,333	133,333	Estimate
Proportion that are UK operated	25%	50%	75%	Assumption.
UK operated business flights	23,333	56,667	100,000	Estimate
Proportion do not provide GAR	5%	10%	15%	BF 2016 and Border Visa Policy Unit.
Flights affected (no GAR)	1,167	5,667	15,000	Estimate
Forms completed by FBO vs business pilot	60%	50%	40%	Assumption
Time taken to complete form	5	10	15	Assumption - minutes
FBO gross wage	£13.54	£13.54	£13.54	ASHE 2020, Table 14.5a, per hour
Pilot gross wage	£48.33	£48.33	£48.33	ASHE 2019, Table 14.5a, per hour (in 2020 prices)
Compliance Cost - (10 yr PV)	£0.02	£0.25	£1.11	Estimate

Private leisuress ongoing costs	Low	Central	High	Source
GA Flights per year	140,000	170,000	200,000	BF, 2016, unpublished.
Leisure flights (%)	0.33	0.33	0.33	CAA Strategic Review of General Aviation (2006) July, London.
Leisure flights	46,667	56,667	66,667	Estimate
Proportion that are UK operated	25%	50%	75%	Assumption.
UK operated leisure flights	11,667	28,333	50,000	Estimate
Proportion who do not provide GAR	5%	10%	15%	Border Force 2016 and Border Visa Policy Unit.
Flights affected (no GAR)	583	2,833	7,500	Estimate
Time taken to complete form	5	10	15	Assumption - minutes
Leisure Opportunity Cost	£7.52	£7.52	£7.52	DfT figures
Compliance Cost - (10 yr PV)	£0.00	£0.03	£0.12	Estimate

Cost £ million (10 yr PV)	Low	Central	High	
Total Familiarisation Cost	£0.3	£0.6	£1.0	PV
Total Compliance Cost	£0.0	£0.3	£1.2	PV
Total business cost	£0.3	£0.8	£2.0	PV
Total cost	£0.3	£0.9	£2.2	PV
NPSV	-£0.3	-£0.9	-£2.2	
BNPV	-£0.3	-£0.8	-£2.0	
EANCB (BIT)	£0.0	£0.1	£0.2	2020 prices

Note: Estimates are rounded numbers. Not all totals sum due to rounding.

Table A.2, Table of GA data for Option 3, assumptions and estimated costs (PV = 2020 prices)

Description	Low	Central	High	Source
GA employment	9,700	9,700	9,700	GA Economic Research Study
Private Familiarisation Costs				
<u>FBO checking staff (%)</u>	10%	20%	30%	Assumption based on ground handler information.
FBO employment volume	950	1,950	2,900	Estimate
Gross wage (uplift 22%)	£13.54	£13.54	£13.54	ASHE 2020, Table 14.5a, gross per hour
Familiarisation time, guidance (hours)	0.10	0.23	0.42	Assumption (Border Force & reading table)
Familiarisation time, portal registration (hrs*0.5)	0.25	0.38	0.50	Assumption
Familiarisation cost (FBO)	£0.01	£0.02	£0.03	Estimate
<u>GA business pilots</u>	17,831	17,831	17,831	CAA email, 8/05/19
Gross wage (uplift 22%)	£48.33	£48.33	£48.33	ASHE 2019, Table 14.5a, per hour put into 2020 prices using GDP deflator
Familiarisation time, guidance (hours)	0.10	0.23	0.42	Assumption (Border Force & reading table)
Familiarisation time, portal registration (hrs*0.5)	0.25	0.38	0.50	Assumption
Familiarisation cost (pilots)	£0.26	£0.52	£0.88	Estimate
Familiarisation Cost (business)	£0.26	£0.54	£0.91	Estimate (Year 1 only)
<u>GA leisure pilots</u>	8,900	8,900	8,900	CAA email, 8/05/19
Gross wage	7.52	7.52	7.52	DfT modified for 2020 prices
Familiarisation time, guidance (hrs)	0.50	0.75	1.00	Assumption (Border Force & reading table)
Familiarisation time, portal registration (hrs)	0.10	0.23	0.42	Assumption
Familiarisation cost (leisure)	£0.04	£0.07	£0.09	Estimate (Year 1 only)
Familiarisation Cost (Private)	£0.31	£0.61	£1.01	Estimate (Year 1 only)
Public sector familiarisation				
BF officer time (hrs)	0.01	0.02	0.05	Border Force time to read Operational Instruction (300 words)
BF officer wage (resource cost)	£31.71	£31.71	£31.71	BFO Opportunity Cost, Home Office
Familiarisation cost (BF)	£0.00	£0.00	£0.01	Estimate
Familiarisation cost (public)	£0.00	£0.00	£0.01	Estimate (Year 1 only)
IT Set-up Costs	£25,000	£50,000	£100,000	Agreed with DDaT
Total Set-up costs	£0.33	£0.66	£1.12	Estimate (Year 1 only)

Private business ongoing costs	Low	Central	High	Source
GA Flights per year	140,000	170,000	200,000	CAA and DfT, uplifted to account for unreported flights.
Business flights (%)	0.67	0.67	0.67	CAA Strategic Review of General Aviation (2006) July, London.
Business flights	93,333	113,333	133,333	Estimate
Proportion that are UK operated	25%	50%	75%	Assumption.
UK operated business flights	23,333	56,667	100,000	Estimate
Proportion who do not provide GAR	5%	10%	15%	BF 2016 and Border Visa Policy Unit.
Flights affected (no GAR)	1,167	5,667	15,000	Estimate
Forms completed by FBO vs business pilot	60%	50%	40%	Assumption
Time taken to complete form	5	10	15	Assumption - minutes
FBO gross wage	£13.54	£13.54	£13.54	ASHE 2020, Table 14.5a, per hour
Pilot gross wage	£48.33	£48.33	£48.33	ASHE 2019, Table 14.5a, per hour (in 2020 prices)
Compliance Cost - (10 yr PV)	£0.02	£0.25	£1.11	Estimate

Private leisures ongoing costs	Low	Central	High	Source
GA Flights per year	140,000	170,000	200,000	BF, 2016, unpublished.
Leisure flights (%)	0.33	0.33	0.33	CAA Strategic Review of General Aviation (2006) July, London.
Leisure flights	46,667	56,667	66,667	Estimate
Proportion that are UK operated	25%	50%	75%	Assumption.
UK operated leisure flights	11,667	28,333	50,000	Estimate
Proportion who do not provide GAR	5%	10%	15%	Border Force 2016 and Border Visa Policy Unit.
Flights affected (no GAR)	583	2,833	7,500	Estimate
Time taken to complete form	5	10	15	Assumption - minutes
Leisure Opportunity Cost	£7.52	£7.52	£7.52	DfT figures
Compliance Cost - (10 yr PV)	£0.00	£0.03	£0.12	Estimate

Cost £ million (10 yr PV)	Low	Central	High	
Total Set-up Cost	£0.3	£0.7	£1.1	PV
Total Ongoing Cost	£0.0	£0.3	£1.2	PV
Total business cost	£0.3	£0.8	£2.0	PV
Total cost	£0.4	£0.9	£2.3	PV
NPSV	-£0.4	-£0.9	-£2.3	
BNPV	-£0.3	-£0.8	-£2.0	
EANCB (BIT)	£0.0	£0.1	£0.2	2020 prices

Note: Estimates are rounded numbers. Not all totals sum due to rounding.

Table A.3, Table of GA data for Option 4, assumptions and estimated costs (PV = 2020 prices)

Description	Low	Central	High	Source
GA employment	9,700	9,700	9,700	GA Economic Research Study
Private Familiarisation Costs				
<u>FBO checking staff (%)</u>	10%	20%	30%	Assumption based on ground handler information.
FBO employment volume				Estimate
Gross wage (uplift 22%)	950 £13.54	1,950 £13.54	2,900 £13.54	ASHE 2020, Table 14.5a, gross per hour
Familiarisation time, guidance (hrs)	0.10	0.23	0.42	Assumption (Border Force & reading table)
Familiarisation time, portal registration (hours*0.5)	0.25	0.38	0.50	Assumption
Compliance Percentage	95%	90%	80%	Assumption
Familiarisation cost (FBO)	£0.00	£0.01	£0.03	Estimate
<u>GA business pilots</u>	17,831	17,831	17,831	CAA email, 8/05/19
Gross wage (uplift 22%)	£48.33	£48.33	£48.33	ASHE 2019, Table 14.5a, per hour converted to 2020 prices with GDP deflator
Familiarisation time, guidance (hours)	0.10	0.23	0.42	Assumption (Border Force & reading table)
Familiarisation time, portal registration (hours*0.5)	0.25	0.38	0.50	Assumption
Familiarisation cost (pilots)	£0.25	£0.47	£0.74	Estimate
Familiarisation Cost (business)	£0.25	£0.49	£0.77	Estimate (Year 1 only)
<u>GA leisure pilots</u>	8,900	8,900	8,900	CAA email, 8/05/19
Gross wage	7.52	7.52	7.52	DfT modified for 2020 prices
Familiarisation time, guidance (hours)	0.50	0.75	1.00	Assumption (Border Force & reading table)
Familiarisation time, portal registration (hours)	0.10	0.23	0.42	Assumption
Familiarisation cost (leisure)	£0.04	£0.06	£0.08	Estimate (Year 1 only)
Familiarisation Cost (Private)	£0.29	£0.54	£0.85	Estimate (Year 1 only)
Public sector familiarisation				
BF officer time (hours)	0.01	0.02	0.05	Border Force time to read Operational Instruction (300 words)
BF officer wage (resource cost)	£31.71	£31.71	£31.71	BFO Opportunity Cost, Home Office
Familiarisation cost (BF)	£0.00	£0.00	£0.01	Estimate
Familiarisation cost (public)	£0.00	£0.00	£0.01	Estimate (Year 1 only)
Cost £ million (10 yr PV)	Low	Central	High	
Total Set-up Cost	£0.3	£0.5	£0.9	
Total Ongoing Cost	£0.0	£0.0	£0.0	PV
Total business cost	£0.3	£0.5	£0.8	PV
Total cost	£0.3	£0.5	£0.9	PV
NPSV	-£0.3	-£0.5	-£0.9	
BNPV	-£0.3	-£0.5	-£0.8	
EANCB (BIT)	£0.0	£0.1	£0.1	2020 prices

Annex 2, Impact assessment checklist

Mandatory specific impact test - Statutory Equalities Duties	Complete
<p>Statutory Equalities Duties</p> <p>The public sector equality duty (PSED) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations in the course of developing policies and delivering services.</p> <p>Policy officials are actively considering the impact of these proposals, and have completed an equality impact assessment (EIA) in relation to how it might, or will, affect people with protected characteristics. The assessment ensures the Minister for Immigration has demonstrated and addressed his due regard to the PSED and that this is an ongoing process.</p> <p>A preliminary analysis indicates that the Home Office may be acting in a manner that is indirectly discriminatory towards three of the protected characteristics: disability, race and sex.</p> <p>In terms of disability, the proposed regulations will require that information is submitted online, as a result the proposed regulations could disproportionately and adversely affect individuals who are visually impaired. To mitigate this the s-GAR portal has been developed in compliance with the Government Digital Service requirements, meaning the online portal can be used with all major screen readers to assist the visually impaired.</p> <p>In terms of race, whilst there is no evidence to indicate that this proposal may have more of an impact on any particular nationality over another. British and EEA nationals may be more likely to be completing short journeys to and from the UK given the proximity of the UK to countries such as France and as a result are more likely to be at a particular disadvantage when compared with other nationalities.</p> <p>In terms of sex, statistics from 2021 held by the Civil Aviation Authority indicate that 96.6 per cent of individuals holding a UK national private pilot's licence are men²⁸ as such the proposal may disproportionately and adversely impact them, putting them at a particular disadvantage.</p> <p>To the extent indirect discrimination may occur, given the objective of this policy is to secure and protect the UK border and enable BF to better assess the risk posed from international GA flights, this policy is considered to have been objectively justified as a proportionate means of achieving a legitimate aim in relation to each of these protected characteristics.</p> <p>Further information on the Home Office assessment of the PSED can be found in the consultation document that accompanies this IA.</p> <p>As part of the eight-week public consultation, policy officials will encourage the sector and any other interested parties to share their views on any direct or indirect discrimination they think the regulations may have on these individuals. Policy officials will review and update the EIA once the consultation is complete.</p> <p>The SRO has read and agreed these findings.</p>	<p>Yes</p>

Any test not applied can be deleted except **the Equality Statement**, where the policy lead must provide a paragraph of summary information on this.

The Home Office requires the **Specific Impact Test on the Equality Statement** to have a summary paragraph, stating the main points. **You cannot delete this and it MUST be completed.**

²⁸ [Pilot licence holders by age and sex 2018.pdf \(caa.co.uk\)](https://www.caa.co.uk/Pilot-licence-holders-by-age-and-sex-2018.pdf)

Economic Impact Tests

<p>Review clauses</p> <p>The Small Business, Enterprise and Employment Act 2015 (s. 28) creates a duty to include a review clause in secondary legislation containing regulations that impact business or civil society organisations.</p> <p>As the measure has impacts of less than +/- £5 million (net annualised direct costs to business) a review clause is not considered necessary. The proposed regulations would be subject to non-statutory review to assess effectiveness and compliance. The review will take place one year after implementation, non-compliance will be dealt with by way of the civil penalty regime.</p>	<p>No (10)</p>
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<p>Small and Micro-business Assessment (SaMBA)</p> <p>The SaMBA is a Better Regulation requirement intended to ensure that all new regulatory proposals are designed and implemented so as to mitigate disproportionate burdens. The SaMBA must be applied to all domestic measures that regulate business and civil society organisations, unless they qualify for the fast track.</p> <p>The regulation will help mitigate security risks arising from unreported GA flights and passengers moving in and out of the UK. Exemptions for SaMBs would allow an avenue for illegal activities for a large share of businesses for whom the regulation is intended, meaning the benefits of the regulation would be lost. The business compliance costs of the new regulation are small (£0.3m PV) and are not considered to be overly onerous.</p>	<p>Yes (9)</p>
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