

White Sheet Radio Flying Club
White Sheet Down, Mere
West Wiltshire
c/o Honorary Treasurer
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9th May 2019

LETTER TO CAA AND Department for Transport

We write on behalf of White Sheet Radio Flying Club, based in Wiltshire. This letter represents the broad view within the club, comprising over 100 members, all of whom signed up for this to request you to review the proposals contained within the CAP1775 and the apparent breakdown of negotiations between the CAA and the BMFA (British Model Flying Association) amongst others.

We believe that the proposal is flawed for the following reasons:

1. The introduction of these new regulations will not discourage those who already operate outside the law and who intend to operate outside the law. It does not provide any additional control than already available from the established model associations.
2. The scheme covers general model flying as well as operation of drones and so covers an area of activity (model flying) that has not been a threat to general aviation for many decades.
3. We believe that the policy will be detrimental to the future of model flying in the UK and place requirements on us which are excessive and more onerous than those for manned aviation – despite the DfT/CAA acknowledging that model flying has established an excellent record over the last century.
4. The estimate of 170,000 registrations is probably grossly over-estimated. This can only mean that the proposed £16.50 registration fee is likely to rise.
5. The method of enforcement / policing is undefined
6. We consider that it is impractical to check on the registration of model flyers and who is flying as the nature of this leisure activity is that it takes place away from centres of population.

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7. The point of registration is undefined. If it is proposed to be at the point of sale of a drone or model aircraft, then you will find that sales will fall and the leisure activity of model flying will decline.

8. The proposed scheme for online testing is wholly inconsistent with the BMFA schemes and does not provide any real proof of competency to fly.

9. The proposed scheme is divergent from other countries. For example in France the equivalent registration scheme for model flyers is completely free and valid for five years; and in Australia being a member of a registered club within the national model flying association (MAAA) is all that is required.

10. The more regulation in place for what is a leisure activity means that participation will reduce.

11. The majority of responsible model flyers are already registered with a national body such as the British Model Flying Association (BMFA) and so there is already in place a means to control model flying. This national body has successfully administered the registration, insurance and achievements of flyers for decades.

12. The consultation paper does not cover how personal data will be protected in accordance with the GDPR regulations.

13. The proposed regulation is inconsistent with EASA Regulations for model flying associations, because it mandates requirements that should instead be subject to negotiation and agreement prior to incorporation into our operational authorisation.

14. The proposals published in CAP1775 are inconsistent with the CAA's aims of being a transparent, fair and effective regulator. We ask you to look at the BMFA's response on their website - [UK Model Flyers – Call to action](#) . This provides constructive and detailed response which WSRFC fully support.

In summary, we believe that the CAA is proposing regulations which are going to penalise tens of thousands of model flyers who operate within the law, the Air Navigation Order (ANO) and the BMFA codes and guidelines; for the sake of a few rogue flyers who will not in any case change their behaviour and who do and will continue to ignore laws and regulations.

Yours sincerely,

p.p. WSRFC