

<b>Title:</b> <b>The Air Navigation Order (ANO) 2009 Changes as a result of EASA Air Operations Regulations</b>  <b>IA No:</b> CAAFO1  <b>Lead department or agency:</b> UK Civil Aviation Authority  <b>Other departments or agencies:</b> DfT	<b>Impact Assessment (IA)</b>
	<b>Date:</b> 16/12/2014
	<b>Stage:</b> Final
	<b>Source of intervention:</b> EU
	<b>Type of measure:</b> Secondary legislation
	<b>Contact for enquiries:</b> Head Flight Operations Policy, CAA e-mail: FOP.Admin@caa.co.uk

<b>Summary: Intervention and Options</b>	<b>RPC Opinion:</b> Awaiting scrutiny
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Cost of Preferred (or more likely) Option			
Total Net Present Value	Business Net Present Value	Net cost to business per year (EANCB on 2009 prices)	In scope of One-In, One-Out? Measure qualifies as One-Out?
-£0.50m	-£0.50m	£0.05m	No   NA

**What is the problem under consideration? Why is government intervention necessary?**

The problem under consideration is the need to ensure that aviation is as safe as reasonably possible across the EU, so that UK citizens can trust that they are safe when flying on any airline in the EU. It is not reasonable to expect the general public to assess complex aviation risks outside their control, so aviation should be overseen by an organisation on behalf of the public.

Government intervention is necessary because only it has the necessary authority to interact fully with the national and international bodies which regulate and oversee aviation safety, and only it can legislate to fulfil the UK's international obligations.

**What are the policy objectives and the intended effects?**

The objective of the new harmonised European civil aviation regulations is to ensure a high and uniform level of protection of European citizens, through the adoption of common safety rules.

The objective of the policy is to ensure consistency between the existing UK legislation and the new European legislation. It is also necessary to make existing offences, penalties and enforcement measures applicable to the new European legislation.

The intended effect of the policy is to have aviation legislation which can be complied with, is enforceable, and is clear in terms of which legislation applies to which legal entities.

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

There is only one policy option considered and that is to amend the Air Navigation Order (ANO) 2009. The CAA are the UK Aviation Regulator with statutory responsibility for aviation safety in the UK and are designated the National Aviation Authority for the purpose of EASA regulations. The amendments will designate the CAA as the competent authority for the purposes of the European Aviation Safety Agency (EASA) Air Operations Regulations, in the same way as it is already designated as the competent authority for the EASA Airworthiness Regulations. If the CAA is not designated as the competent authority, UK air operators would not be able to meet their obligations under the EASA Air Operations Regulations to obtain approvals in order to fly, since there would be no organisation from which they could obtain these approvals.

**Will the policy be reviewed?** It will not be reviewed. **If applicable, set review date:** Month/Year

Does implementation go beyond minimum EU requirements?			No		
Are any of these organisations in scope? If Micros not exempted set out reason in Evidence Base.	<b>Micro</b> Yes	<b>&lt; 20</b> Yes	<b>Small</b> Yes	<b>Medium</b> Yes	<b>Large</b> Yes
What is the CO <sub>2</sub> equivalent change in greenhouse gas emissions? (Million tonnes CO <sub>2</sub> equivalent)			<b>Traded:</b> NQ	<b>Non-traded:</b> NQ	

***I have read the Impact Assessment and I am satisfied that (a) it represents a fair and reasonable view of the expected costs, benefits and impact of the policy, and (b) that the benefits justify the costs.***

Signed by the responsible Minister

Robert Goodwill

Date: 17 December 2014

# Summary: Analysis & Evidence

# Policy Option 1

**Description:** Amend the ANO in order to implement mandatory EU regulations.

## FULL ECONOMIC ASSESSMENT

Price Base Year 2014	PV Base Year 2012	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low: NQ	High: NQ	Best Estimate: -£0.5

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	NQ	NQ	NQ
High	NQ	NQ	NQ
Best Estimate	£0.5m	-	£0.5m

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

There will be costs for airline operators in familiarising themselves with the new EU regulations and amending any manuals or documents before they come into force.

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

.CAA experienced additional workload resulting in longer than usual working hours for some of its employees and a small opportunity cost for industry.

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	NQ	NQ	NQ
High	NQ	NQ	NQ
Best Estimate	NQ	NQ	NQ

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

None.

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

Members of the public will benefit from enhanced safety standards which will be consistent across EU airlines. This means UK citizens will be as safe when they travel on other EU airlines as they are when they travel on UK airlines. There will also be a benefit for all EU air operators as they will have to comply with consistent standards across all EU countries and therefore not have to familiarise themselves with country-specific standards.

### Key assumptions/sensitivities/risks

### Discount rate

3.5%

Businesses spent 200 hours, on average, over a period of 2 years to familiarise and amend documents, e.g. manuals, to be consistent with the EU regulations. We assume that such activities occur at the head office and have used the mean wage at head offices in the service industry (taken from ONS and uplifted to include employer pension contributions) to monetise that time.

Based on data from CAA, 20% of all hours spent on familiarisation and amendment are in 2013 and the other 80% are in 2014.<sup>1</sup>

## BUSINESS ASSESSMENT (Option 1)

Direct impact on business (Equivalent Annual) £m, 2009 prices:			In scope of OIOO?	Measure qualifies as
Costs: £0.05	Benefits: 0	Net: -£0.05	No	NA

<sup>1</sup> Based on information provided by the CAA.

# Evidence Base (for summary sheets)

## 1 Problem under Consideration

- 1.1 The problem under consideration is the need to ensure that aviation is as safe as reasonably possible. It is important for aviation to be safe so that members of the public (both on board aircraft and on the ground) can have trust in the aviation system without having to understand it for themselves. The standard is intended to apply the same aviation safety regulation across the EU, to ensure that UK citizens are as safe when they travel on other EU airlines as they are when they travel on UK airlines. It is desirable for the UK to continue to have a low aviation accident rate.
- 1.2 The frequency of the problem is difficult to determine, since over the past few decades the UK has had rigorous safety legislation in place in order to tackle the problem. There are various definitions of ‘accident’ that can be used, but focusing on commercial flights in aeroplanes and helicopters (since these are the flights which will be subject to European legislation first) the accident rates for the years 2000-2009 are as follows:

Reportable accident rate (per million flights)	10.1
Reportable accident rate (per million flying hours)	5.3
Fatal accident rate (per million flights)	0.5
Fatal accident rate (per million flying hours)	0.2

A more detailed explanation of these rates is given in Annex 1.

- 1.3 In this document the phrase ‘air operators’ refers to both commercial flights (e.g. airlines) and private pilots flying for pleasure. The phrase ‘air operations’ should be construed similarly.

## 2 Rationale for Intervention

- 2.1 Due to the complex nature of aviation and the fact that the risks are usually beyond the control of members of the public, it is not reasonable to expect the general public to be able to assess the risks of aviation fully. Therefore it is necessary for organisations to provide oversight of aviation on behalf of the public. It is necessary for the government to intervene and manage the problem because only it has the ability to legislate to ensure that aviation is safe. In addition, only the government has the necessary authority to interact fully with the other national and international bodies which regulate and oversee aviation safety, such as the International Civil Aviation Organization (ICAO) and the European Aviation Safety Agency (EASA).
- 2.2 The government has already intervened to address the problem of ensuring aviation safety, first by introducing aviation legislation in the UK and more recently by committing the UK to abiding by European aviation safety regulation. The European Communities Act 1972 obliges the UK Government to incorporate into domestic law legislative acts of the European Community. European Community Regulations have "general application", that means they are binding on individuals and effectively form part of domestic law as soon as they are made. Regulation (EC) No. 216/2008 (‘the Basic EASA Regulation’) introduces requirements for aircraft operations. From the 28 October 2014 these requirements supersede existing UK legislation.
- 2.3 The Basic EASA Regulation and the associated Essential Requirements and Implementing Rules are hereafter referred to as the ‘EASA Regulations’. The subset of them which relate to air operations are referred to as the ‘EASA Air Operations Regulations’.
- 2.4 The EU implementing rules on air operations are directly applicable and came into force on 28 October. UK operators are already complying with the requirements of the EU implementing rules and are certified by the CAA which has been appointed by Secretary of State as the competent authority for the purposes of those rules.
- 2.5 The EU implementing rules for aeroplane operations are based on existing EU requirements contained in Annex III to EU Regulation 3922/91. For helicopter operations the rules are based on standards agreed by the European Joint Aviation Authorities. The main change that most

operators will see is in presentation of the rules rather than the actual requirements themselves. There was a transition period of 2 years during which operators could familiarise themselves with the new rules, update to manuals, procedures etc and change the basis for their air operator certificates.

- 2.6 The amendments in Part 2 of the Order do not of themselves impose any additional requirements on operators. The amendments either:
- i) limit the scope of existing ANO requirements to aircraft/operators that are outside of the scope of the EU implementing rules;
  - ii) amend references to Annex III to EU Regulation 3922/91 to Commission Regulation 965/2012 for mainstream commercial air transport operations; or
  - iii) expand existing offences and enforcement provisions to bring EU implementing rules within scope.
- 2.7 As a member of ICAO the UK has an obligation to regulate and oversee the safety of its aviation. UK air operators are allowed to fly their aircraft into the airspace of other States only because the UK has sufficient oversight of aviation safety.

### **3 Policy Objective**

- 3.1 The objective of the harmonised civil aviation European regulations is to ensure a high and uniform level of protection of European citizens, through the adoption of common safety rules and by measures ensuring that products, persons and organisations in the EU comply with such rules. This facilitates the free movement of goods, persons and organisations within the EU. The European regulations are broadly equivalent to the existing UK regulations.
- 3.2 The objective of the policy is to reconcile the existing UK legislation and the new European legislations. The Basic EASA Regulation introduces requirements for aircraft operations. An air operator to which the new Regulation applies must comply with that Regulation and not with the equivalent provision in the Air Navigation Order (ANO).
- 3.3 Currently, in accordance with the ANO, UK air operators have to obtain certificates and approvals from the CAA to demonstrate that they can operate safely. Under the European requirements air operators will have to obtain these certificates and approvals from their national 'competent authority'. An organisation will have to be designated as the UK competent authority for the purposes of the European Air Operations Regulations, otherwise it would be impossible for UK air operators to obtain the necessary certificates and approvals. This would mean they would be unable to comply with the regulations and therefore they would be unable to fly legally.
- 3.4 Another aspect of reconciling the UK and European legislation is the need to establish sanctions for breaches of specified provisions of the EASA Regulations so that compliance will be enforceable.
- 3.5 Finally, the ANO needs to avoid double-banking, so many existing provisions need to be amended to reflect the fact that for a significant proportion of air operations the EASA Air Operations Regulations will apply instead.

### **4 Description of Option Considered**

- 4.1 In the consultation stage Impact Assessment three options were considered. Since the second of these options was really the same as the third option, but with some of the changes delayed, this would not have been in accordance with the guidance that double-banking (i.e. having UK legislation which overlaps or contradicts EU legislation) should be avoided. Also, no commenter expressed a preference for the second option. For these reasons we have therefore omitted the second option.
- 4.2 The first option in the consultation stage Impact Assessment, the 'do nothing', has also been omitted. In this option the EASA Regulations would still come into force but the CAA would not be empowered to administer the European regulations and so the UK would not be able to fulfil its obligations as an ICAO member State. In this option the UK would not be seen to have adequate oversight of aviation safety, so UK air operators would not be permitted to fly in the airspace of foreign States. Similarly, the UK would not have the legal competence to carry out safety checks

on foreign operators flying into the UK, so almost all aviation in the UK would be curtailed. This would be in contradiction to objectives of the European regulations of facilitating the free movement of goods, persons and organisations within the EU. Furthermore, UK businesses would be put at a competitive disadvantage relative to their EU counterparts, since UK citizens and UK businesses would not be able to continue to undertake present activities lawfully. Given the unlikelihood of this situation being allowed to arise we have omitted this option.

4.3 Given this new presentational approach there is really only one policy option, which we now refer to as Option 1 from here onwards. This option is to amend the ANO in order to facilitate the transition from UK to European law in such a way that air operations are not restricted unnecessarily. The three aspects of the ANO that require amendment are:

- an entity needs to be designated as the competent authority for the purposes of the EASA Air Operations Regulations;
- the penalties in the ANO need to include sanctions for breaches of specified provisions in the EASA Air Operations Regulations, so that the European regulations are enforceable in the UK; and
- many existing provisions need to be amended to reflect the fact that for a significant proportion of air operations the EASA Air Operations Regulations will apply instead.

4.4 A public consultation on the issue was carried out in July-September 2011, and no objections were received to the proposed amendments to the ANO.

4.5 It is worth noting that we have also revised the counterfactual in this impact assessment to one in which the EU does not introduce the EASA Regulations. Consistent with section 2.4 of the Better Regulation Framework Manual, we have not included a 'do nothing' policy option as action is required to comply with the EU obligations.

## 5 Costs and Benefits of Each Option

### 5.1 General

5.1.1 The estimates of costs and benefits used in the consultation stage Impact Assessment were rough estimates. During the consultation no feedback regarding the cost and benefit estimates was received from industry or the public.

### 5.2 Costs and Benefits of Option 1

5.2.1 The policy option imposes costs on business through three channels. One channel is that UK airlines have to familiarise themselves with the new **EASA Air Operations Regulations**. The second channel is that UK airlines will have to make adjustments for any impact the new EU regulations have e.g. update and reprint manuals and documents. The third channel is that UK airlines will have to obtain certificates from the CAA once it is designated as the national competent authority; obtaining these certificates could also bring about familiarisation costs to business.

5.2.2 We assume the impact on business of familiarising themselves with the changes to the EU regulations is relatively small. The majority of the additional time spent by business will be on making any changes required e.g. to manuals and documents. It is estimated that 200 hours on average will be required per business to familiarise themselves with the changes and make any necessary changes<sup>1</sup>; there are 112 airline operators that will be affected by this. 5 of these hours were dedicated to familiarisation with the EU regulations and 195 were spent on reprinting manuals and documents. We assume the third channel did not impose any costs. This is because, currently, in accordance with the ANO, UK air operators already have to obtain certificates and approvals from the CAA to demonstrate that they can operate safely. The CAA will be designated the national competent authority, but will continue to operate in a very similar way as it does now. Therefore, it is assumed that the process for air operators to apply for certificates and comply with the new European regulations would be broadly similar and therefore that the net cost to business of the third channel is zero.

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<sup>1</sup> Based on information provided by the CAA.

- 5.2.3 The costs of making the CAA the competent authority and to issue the required certificates and approvals is thought to be negligible as the CAA is responsible for doing this for national regulations already. There may be some additional transitional workload for the CAA to process forms from air operators when the regulations are initially implemented, but it is assumed this would be covered by the CAAs usual staffing costs.
- 5.2.4 The additional workload to the CAA caused by the EASA regulations can impose a small cost on it. Nonetheless, we expect this cost to be small and restricted to the implementation period. This is because the CAA already works with air operators granting them permission to operate, so the nature of the ongoing work is expected to be something CAA is familiar with. Any additional work will only be temporary during the transitional period. It is expected that the additional workload will have two impacts. Firstly, due to the lack of spare capacity to absorb the work, existing staff will work some additional hours<sup>2</sup>. Secondly, some other piece(s) of work may be delayed while staff deal with the transition. This latter impact is a small opportunity cost. The delayed piece(s) of work could have benefited business, but part of the resources needed to deliver them have been dedicated to implementing the EU changes. Nonetheless, because of the small scale and familiar nature of the work, the opportunity cost is unlikely to be substantial, especially as the delay will only be short term during the transitional period. These impacts have therefore not been quantified.
- 5.2.5 There are also benefits associated with the regulations. Consistent regulations across the EU will be beneficial for airline operators, making it simpler to comply with the regulations right across their business. Passengers will also benefit from enhanced safety standards which will be consistent across EU airlines, meaning UK citizens will be as safe when they travel on other EU airlines as they are when they travel on UK airlines. These benefits have not been quantified.
- 5.2.6 Supporting airlines and providing confidence to passengers is important given the economic impact of aviation is substantial and the effect on the wider economy significant. The following examples are taken from the Executive Summary of a 2006 report by Oxford Economic Forecasting ([The Economic Contribution of the Aviation Industry in the UK](#)):
- The aviation industry generated £11.4 billion value-added in 2004 – in other words, it contributed £11.4 billion to GDP, 1.1% of the overall economy.
  - Nearly three-quarters of international visitors to the UK arrive by air. Spending by visitors who arrive by air is equivalent to 1.1% of GDP.
  - 55% of the UK's exports of manufactured goods to countries outside the EU are transported by air.
  - More than 60% of imports of machinery, mechanical appliances and electric equipment from outside the EU are carried by air.
  - 10% of companies say they would relocate some operations from the UK if next day international express delivery services – which rely on night flights from selected UK airports – ceased to be available.

## 6 Risks and Assumptions

- 6.1 Businesses spent 200 hours, on average, over a period of 2 years to familiarise themselves with the EU regulations. We assume that familiarisation with regulations occurs at the head office and have used the mean wage at head offices in the service industry (taken from ONS and uplifted to include employer pension contributions) to monetise that time. Based on data from CAA, 20% of all hours spent on familiarisation in 2013 and the other 80% in 2014.

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<sup>2</sup> Based on information provided by the CAA

## 7 Direct Costs and Benefits to Business Calculations (following OITO methodology)

7.1 The overall costs of Option 1 compared to the counterfactual are estimated based on the number of hours required by businesses to familiarise themselves with regulation changes and make any required amendments to manuals and documents (assumed to be 200 hours on average<sup>3</sup>), and the hourly salary paid to them by business. The latter is based on a gross wage for staff carrying out head office activities of £20 (2014 prices), from the ONS Annual Survey of Pay and Earnings 2014. This has been inflated by 18.5% to give the salary rate (c. £24, 2014 prices), the difference reflecting additional costs to business above the wage rate e.g. pension contributions. The 18.5% uplift is based on the 2008<sup>4</sup> Labour Cost Survey.

7.2 As these costs all fall on business the NPV and the Business NPV are the same thing. This gives the following estimate:

Estimate	(Business) NPV (£ million, 2014 prices)
Best	-0.50

7.3 From the 'One-In, Two-Out (OIOO) Methodology' document, the EANCB is given by:

$$EANCB = \frac{PVNCB}{a_{t,r}}$$

where:

PVNCB (Present Value of Net Cost to Business) is the negative of the Business NPV;  
 $a_{t,r}$  is the annuity rate.

For a time period of 10 years and a discount rate of 3.5% the annuity rate is:

$$a_{10, 0.035} = \frac{1.035}{0.035} \left[ 1 - \frac{1}{(1.035)^{10}} \right] = 8.607686509$$

7.4 Therefore the estimate for the EANCB is as follows:

Estimate	PVNCB (£ million, 2014 prices)	EANCB (£ million, 2009 prices)
Best	-0.50	-0.05

## 8 Wider Impacts

### 8.1 Statutory Equality Duties

#### 8.1.1 Race

8.1.1.1 The proposals relate to all air operators, therefore we do not anticipate that these amendments will lead to:

- different consequences according to people's racial group;
- people being affected differently according to their racial group in terms of access to a service, or the ability to take advantage of proposed opportunities;
- discrimination unlawfully, directly or indirectly, against people from some racial groups;
- different expectations of the policy from some racial groups;
- harmed relations between certain racial groups, for example because they will be seen as favouring a particular group or denying opportunities to another; or

<sup>3</sup> Based on information provided by the CAA.

<sup>4</sup> Latest available data for employer pension contributions



- damaged relations between any particular racial group (or groups) and the Department for Transport (DfT).

### *8.1.2 Disability*

8.1.2.1 The Disability Discrimination Act (DDA) 1995 now gives rights to disabled people in the area of access to goods, facilities and services. The proposals apply equally to all air operators, so we do not anticipate any disadvantages or discrimination for disabled people, in line with this Act.

### *8.1.3 Gender*

8.1.3.1 The proposals will apply to all air operators. Therefore we do not anticipate that these amendments will lead to:

- different consequences according to people's gender;
- people being affected differently according to their gender in terms of access to service, or the ability to take advantage of proposed opportunities;
- discrimination unlawfully, directly or indirectly, against genders; or
- different expectations of the policy from different genders.

## **8.2 Economic Impacts**

### *8.2.1 Competition*

8.2.1.1 If the ANO is amended to nominate the CAA as the competent authority for the purposes of the EASA Air Operations Regulations, then air operations would continue under similar requirements as is currently the case, so there would not be an impact on competition.

### *8.2.2 Small Firms*

8.2.2.1 The EASA Regulations will come into force in October 2014, regardless of what action is taken by the UK government. The purpose of the proposed change to the ANO is to minimise the disruption caused by the EASA Regulations superseding certain UK regulations.

8.2.2.2 Any disproportionate impact on small firms due to the EASA Regulations cannot be mitigated by these policy options and so is outside the scope of this consultation.

8.2.2.3 Under the policy small air operators would be in the same position as larger ones, in that they would have to comply with the EASA Air Operations Regulations just as they currently have to comply with UK and European Air Operations Regulations.

## **8.3 Environmental Impacts**

### *8.3.1 Greenhouse Gas Assessment*

8.3.1.1 It is recognised that the environmental impact of the aviation industry is considerable. Under this policy (Option 1) greenhouse gasses would continue to be emitted as usual, by aviation, road, rail and sea travel.

### *8.3.2 Wider Environmental Issues*

8.3.2.1 There are two wider environmental issues relevant to the aviation sector as a whole: noise pollution and air quality. Under the policy (Option 1) noise pollution and air quality would remain as it is now, subject to any changes in aircraft efficiency.

## **8.4 Social Impacts**

### *8.4.1 Health and Well-being*

8.4.1.1 The policy is not expected to have a direct impact on health. There is no potential for the policy to directly affect wider determinants of health such as income or the environment, nor is there any potential for the policy to affect relevant lifestyle-related factors such as physical activity or diet. There is no anticipated impact on the demand for health and social care services.

#### *8.4.2 Human Rights*

8.4.2.1 It is not anticipated that the policy will have any human rights impacts.

#### *8.4.3 Justice System*

8.4.3.1 It is not anticipated that the policy will have any implications for the justice system.

#### *8.4.4 Rural Proofing*

8.4.4.1 It is not believed that the policy will have a different impact on people in rural areas because of their particular circumstances or needs.

### **8.5 Sustainable Development**

#### *8.5.1 Sustainable Development Impact Test*

8.5.1.1 Sustainable development entails the current generation satisfying its basic needs and enjoying an improving quality of life without compromising the position of future generations. The policy does not affect the resources available to future generations, and is therefore compatible with sustainable development.

## Annex 1 – Estimation of Accident Rates

This Annex provides a more detailed explanation of the figures given above on accident rates.

CAP 800 *UK Safety Performance Volume I* gives the numbers of various types of accident and incident for various types of aircraft for the years 2000-2009.

The European regulations will initially apply to commercial air transport using aeroplanes and helicopters, and to operations requiring specific approval (e.g. low-visibility operations or the transport of dangerous goods) carried out by any aircraft. It is likely that the regulations governing operations requiring specific approval will affect a greater proportion of commercial operations than non-commercial operations, so overall the regulations will initially have the largest effect on commercial operations. The data in CAP 800 that most closely matches this category is UK public transport, so the data from Chapter 1 has been used, except for balloons which will not initially be subject to the European commercial air transport regulations.

Paragraphs 2.3-2.5, 3.4-3.6 and 4.6-4.8 of Chapter 1 to CAP 800 include the following data:

Aircraft Type	No. of Reportable Accidents	No. of Fatal Accidents	No. of Flights (x 1000)	No. of Flying Hours (x 1000)
Large Aeroplanes	113	3	11523	26950
Small Aeroplanes	16	1	649	427
Helicopters	22	3	2646	1336

Summing this data gives the following:

Aircraft Type	No. of Reportable Accidents	No. of Fatal Accidents	No. of Flights (x 1000)	No. of Flying Hours (x 1000)
All Public Transport Aeroplanes and Helicopters	151	7	14818	28713

Dividing the number of accidents by the number of flights (or number of flying hours) gives the accident rate:

Aircraft Type	Reportable Accident Rate (per million flights)	Reportable Accident Rate (per million flying hours)	Fatal Accident Rate (per million flights)	Fatal Accident Rate (per million flying hours)
Large Aeroplanes	9.806	4.193	0.260	0.111
Small Aeroplanes	24.653	37.471	1.541	2.342
Helicopters	8.314	16.467	1.134	2.246
Total	10.190	5.259	0.472	0.244

Except for the accident rates (per million flying hours) for small aeroplanes, the rates for the three aircraft types agree with the rates given in paragraphs 2.6, 3.7 and 4.9 of Chapter 1 to CAP 800, as given below:

<b>Aircraft Type</b>	<b>Reportable Accident Rate (per million flights)</b>	<b>Reportable Accident Rate (per million flying hours)</b>	<b>Fatal Accident Rate (per million flights)</b>	<b>Fatal Accident Rate (per million flying hours)</b>
Large Aeroplanes	9.8	4.2	0.3	0.1
Small Aeroplanes	24.7	37.6	1.5	2.4
Helicopters	8.3	16.5	1.1	2.2

The minor discrepancy for small aeroplanes is possibly due to a more accurate figure being used in the CAP 800 calculations for the number of flying hours in small aeroplanes.