

Prioritisation Principles

A Consultation by the Civil Aviation Authority (CAA)

Submission by the British Air Transport Association (BATA)

April 2011

1. The British Air Transport Association (BATA) welcomes the opportunity to submit evidence to the consultation on '*Prioritisation Principles*', being undertaken by the Civil Aviation Authority (CAA).
2. BATA is the trade body for UK registered airlines. Our eleven members¹ cover all sectors of the airline industry – including freight, charter, low fare, regional operations and full service. In 2010, BATA members directly employed over 71,000 people, operated four fifths of the UK commercial aircraft fleet and were responsible for some 96% of UK airline output, carrying 119 million passengers and 1 million tonnes of cargo².
3. We have a fundamental objection to the fact that the CAA restricts the definition of “consumer” solely to the passenger or freight shipper. Airlines are consumers as well and this needs to be recognised by the CAA.
4. Overwhelmingly airlines now operate in highly competitive markets. Such a level of competition serves a major source of protection for the interests of final users. It is not really appropriate for a regulator like the CAA, operating at some distance from the industry it regulates, to tell airlines how they should run their own businesses. We would welcome clarification of how the CAA plans to avoid running the risk of becoming too interventionist and re-regulating the airline industry.
5. There is always a cost to regulation. Sometimes that cost, including unintended consequences, can exceed the benefits. The CAA should undertake a full cost/benefit analysis, in consultation with stakeholders, before adopting any significant new rules or regulations.
6. We note that the CAA intends to assess annually the outcomes of its prioritisation decisions and consider the lessons learned. Such an assessment should include a full consultation with stakeholders.
7. It is understandable that the CAA should want to educate end users on their rights. However, it is equally important that the CAA should see its role as minimising unreasonable end user expectations and working for sensible, balanced and workable regulation. The CAA should insist wherever possible on public debate rather than concentrating on confidential lobbying.

Simon J L Buck
Chief Executive
April 2011

¹ Air Southwest, British Midland International, British Airways, DHL, easyJet, Flybe, Jet2.com, Monarch, Thomas Cook, Thomson Airways and Virgin Atlantic.

² CAA 'UK Airline Statistics: 2010 – Annual', tables 1.14 1.11.2 and 1.6