



## Federal Aviation User Fees

The implementation of an additional aviation user fee, or per-flight fee, is a contentious issue for general aviation (GA) aircraft owners and pilots. Federal taxes are already levied on aviation fuels and FAA authority is given to publicly funded airports to levy fees to users of those airports' facilities to support aviation infrastructure, repair, and services.

The General Aviation Coalition, in which NAAA is a member, argues GA pilots already pay their fair share of fuel taxes, and that similar per flight charges in other countries have been economically catastrophic to GA. Further, agricultural aircraft operators do not typically use the air traffic control (ATC) system, as they operate in rural, uncontrolled airspace, and typically use their own private airstrips rather than public airports.

### Federal Policy Background

In 2007, the Senate Committee on Commerce, Science and Transportation's Aviation Subcommittee marked up a bill in the 110<sup>th</sup> Congress that required turbine-equipped GA aircraft using public airports to pay a \$25 per flight surcharge in addition to federal excise taxes already levied on aviation fuels. NAAA was successful at the time in carving out an exemption for aircraft used for agricultural purposes.

In 2011, the Obama administration proposed a broad deficit reduction plan which included a \$100 per flight fee, payable to the FAA, by aviation operators who fly in controlled airspace. Congress refused to address this plan.

In each of President Trump's 2017, 2018 and 2019 budget requests, ATC privatization plans to be funded by unspecified user fees were proposed. This did not appear in the President's 2020 or subsequent budget requests.

### Agricultural Aviation should be Exempt from User Fees

Agricultural aircraft make multiple take-offs and landings in a single day. Aerially applied fertilizer applications can number 60 in a single day. If a \$100 user fee was levied on an aerial applicator making 60 fertilizer applications in a single day that would cost that applicator \$6,000. Since 127 million out of the 450 million acres of cropland in the U.S. are treated by air with crop protection products, any type of user fee is a massive cost that will trickle down to the farmer and, ultimately, the food, fiber and bio-fuel consumer.

Agricultural aviators seldom use the air traffic control (ATC) system, if at all. According to NAAA's 2019 Industry Survey, 55 percent of respondents said they never have reason to contact ATC. An additional 18 percent said they contact ATC less than 5 time a year. The remaining 27 percent said they contact ATC six or more times a year.

According to the same survey, 58 percent of aerial application operations are based at private airports. Furthermore, if an aerial applicator were to use a public airport, the FAA has established rules and regulations [see FAA's Airport Compliance Handbook (Order 5190.6A)] providing guidance for these public airport entities to recover costs through fees and other charges to make the airport self-sustaining. Aerial applicators are charged these fees if they use these airports.

The implementation of a user fee system would needlessly require the creation of a new costly bureaucracy that would serve to only further burden already strained small businesses. The current system in place is simple and efficient, allowing operators to pay at the pump, and avoids additional burdens for the federal government and general aviation alike.



## About NAAA

The National Agricultural Aviation Association (NAAA) represents the interests of the 1,560 aerial application industry owner/operators and 2,028 non-operator agricultural pilots throughout the United States licensed as commercial applicators that use aircraft to enhance food, fiber and bio-energy production, protect forestry, and control health-threatening pests. Furthermore, through its affiliation with the National Agricultural Aviation Research & Education Fund (NAAREF), NAAA contributes to research and education programs aimed at enhancing the efficacy and safety of aerial application.

Contact Andrew D. Moore, NAAA's Chief Executive Officer, at [admoore@agaviation.org](mailto:admoore@agaviation.org) or (202) 546-5722 with any questions regarding this issue, or any other related to the aerial application industry. Find more information at [agaviation.org](http://agaviation.org)

## Importance of the Aerial Application Industry

Aerial applicators **annually treat:**

- 127 million acres of cropland (28% of the treated commercial cropland nationwide)
- 5.1 million acres of forest land
- 7.9 million acres of pasture and rangeland
- 4.8 million acres for public health and mosquito control

Aerial application is often the **only tool** to:

- Expediently eradicate a pest before it destroys a crop.
- Treat crops on rolling hills or in fields with soil too wet for ground applications.

The aerial application industry represents **\$37 billion in value** to farmers, input suppliers, processors and agricultural transportation and storage industries.

Without the aerial application of pesticides, the US would see annual losses of:

- 1.69 billion bushels of corn
- 199 million bushels of wheat
- 548 million pounds of cotton
- 295 million bushels of soybeans
- 3.33 billion pounds of rice

The total area of cropland needed to replace the yield lost if aerial application was not available for corn, wheat, soybean, cotton, and rice production is **27.4 million acres**, an area roughly the size of Tennessee.

Aerial applicators seed 3.8 million acres of cover crops annually<sup>2</sup>, **sequestering over 2 million tons of CO<sub>2</sub>**. According to the EPA this would be the equivalent of removing approximately 412,000 cars with carbon-combustion engines from the roads each year.

12

<sup>1</sup> National Agricultural Aviation Association. May 2019. "2019 NAAA Aerial Application Industry Survey: Operators." [agaviation.org/2019-naaa-operator-survey](http://agaviation.org/2019-naaa-operator-survey)

<sup>2</sup> Dharmasena, S. 2020. "How Much is the Aerial Application Industry Worth in the United States?" Research presented at the 2020 Ag Aviation Expo, Savannah, GA. [agaviation.org/aat-expo-presentations](http://agaviation.org/aat-expo-presentations)