

The logo for ACI Europe is a blue square containing the letters 'ACI' in a large, white, serif font. Below 'ACI', the word 'EUROPE' is written in a smaller, white, sans-serif font. A white swoosh graphic curves across the logo from the bottom left to the top right.

ACI EUROPE POSITION
on the revision of
EU DIRECTIVE 2002/30
(noise-related operating restrictions
at community airports)

**AIRPORTS COUNCIL
INTERNATIONAL**

6 SEPTEMBER 2011

EU Directive 2002/30

Introduction

1. European airports have a long history of noise management. Indeed, the first noise mitigation measures implemented around airports often date back to more than 30 years ago (e.g. 1964 at Frankfurt Airport, 1979 at Amsterdam Schiphol). To date and on an airport-by-airport basis, airport operators have adjusted the set of comprehensive noise management measures that they can use, when a noise issue is identified.
2. Indeed, it is worth noting that airport operators rely on a combination of measures to mitigate the noise impact of aircraft activities: variation of landing fees, limitation of the use of reverse thrust, imposition of fines on noisy aircraft, limitation of taxiing time and APU usage, quota count systems but also noise insulation programmes. ACI EUROPE members are looking to the development of a set of best practices to help them further improving noise exposure situations, when a problem is identified. Each airport would be able to select which measures are fit for purpose in relation to the airport's environmental objectives. Defining best practices requires an identification of the success criteria at each airport, taking into account that success criteria may differ from one airport to another.
3. Directive 2002/30 or the "Balanced Approach" Directive was meant to provide aviation stakeholders and public authorities with a "common framework of rules and procedures for the introduction of operating restrictions at Community airports". It applies to airports with more than 50,000 civil jet movements per year and allows the gradual withdrawal over a period of 5 years of so called marginally compliant aircraft (defined as aircraft not meeting the Chapter 3 standard with a cumulative margin of at least 5EPNdB) on an airport-by-airport basis. The Directive requires Member States to adopt a Balanced Approach to noise management.
4. However, the added-value of this Directive for airport operators is difficult to assess, since most of the measures implemented at airports were introduced before 2002. Also, as noted in the European Commission's report on the implementation of Directive 2002/30¹, there is no clear indication about potentially prohibited restrictions. Thus, should Directive 2002/30 be revised, it would be essential to ensure that the revised text has added value at European level.

¹ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2008:0066:FIN:EN:PDF> COM(2008)66 final

Current State of Play of the implementation of the four elements of the Balanced Approach: reduction of noise at source, land-use planning, noise abatement operational procedures and operating restrictions.

A) Noise at source

1. The International Civil Aviation Organisation (ICAO) is responsible for developing certification standards for noise from civil aircraft. These standards are described as chapters, which set maximum permissible noise levels for aircraft during landing and take-off.
2. Since 2002, Chapter 2 aircraft have been banned in Europe. The introduction of operational restrictions on marginally compliant chapter 3 aircraft is subject to clear rules, as set-out in ICAO Assembly Resolution A35-5, Appendix D.
3. According to this resolution, aircraft manufactured since 2006 must meet the requirements of Chapter 4, currently the most stringent standard. As a result, it means that aircraft entering today's fleets are on average 20 dB quieter than 40 years ago, which represents a subjective noise reduction in the order of 75%.
4. Thus, noise reduction at source appears as one of the most effective means of limiting the noise impact of aircraft around airports.
5. Against this background, in 2010, ICAO Council's Committee on Aviation Environmental Protection (CAEP) agreed to work towards developing new stringency options, up to -11 dB cumulative margin relative to Chapter 4. The development of noise stringency scenarios are supported by the analysis of environmental and economic implications. On this basis, CAEP/9 could take a decision on new noise stringency standard in 2013.

However, the implementation of more stringent noise standards could be jeopardized by the increasing pressure on manufacturers to produce lower CO₂ emitting engines. ACI EUROPE believes that decision-makers at international and regional level should align R&D investments with ambitious environmental objectives and financially support manufacturers to reach the technological breakthrough needed to comply with ambitious noise and emissions reduction targets, with a view to encouraging the introduction of new technology into airline fleets as soon as possible. To this end, the next EU Framework Programme for Research and Technological Development should take full account of this priority.

B) Land-use planning

1. One of the four elements of the Balanced Approach, land-use planning requires close cooperation between competent State administrations and airport authorities. In ICAO Resolution 35-5, States are urged "to ensure that the potential reduction in noise levels to be gained from the introduction of quieter aircraft, particularly those complying with the new Chapter 4 standard, are also not compromised by inappropriate land-use or encroachment".
2. Numerous examples across Europe show how decisive a well-designed land-use planning policy can be. The decision to build **Roissy Charles de Gaulle Airport** in a sparsely populated area in the 1960s was not matched with a consistent land use planning policy. Thus, the number of inhabitants around the airport has

grown over time until 1989, when a Noise Exposure Plan was adopted in order to avoid the increase of inhabitants exposed to noise around the airport.

3. As part of the expansion of **Copenhagen Airport** in the 1980s, a comprehensive package of environmental mitigation measures with night time restrictions, curfews and a noise insulation scheme were introduced at the airport. This was implemented together with a strict land-use plan for the area covered by the noise insulation programme.

Against this background, ACI EUROPE urges the European Commission to reinforce land-use planning provisions aimed at guaranteeing that public authorities bear the responsibility and the associated costs of an increase in population exposed to noise due to inappropriate land-use planning.

Coherent land-use planning policies can be developed on the basis of airports' noise maps and action plans. Indeed, EU Directive 2002/49 (also called Environmental Noise Directive) requires EU Member States to designate civil airports with more than 50,000 movements per year in order to collect their noise maps and action plans. In this context, these airports have to conduct a thorough assessment of population exposure to noise. ACI EUROPE believes that the requirements of Directive 2002/49 should be used when implementing Directive 2002/30.

C) Noise abatement operational procedures

1. The introduction of noise abatement operational procedures requires the involvement of airport operators, airlines, air navigation service providers and national regulators. These procedures can be Noise Preferential Routes (NPRs) or Continuous Descent Operations (CDO). In one case, airlines are requested to avoid densely populated areas (NPRs), in the other case, the main aim is to keep the aircraft as high as possible for as long as possible without adversely affecting the application of a safe descent approach. Research suggests that a reduction of up to 5 dBA SEL over conventional approaches can be achieved².
2. IATA, CANSO, ACI EUROPE and Eurocontrol signed a Joint European CDO Action Plan in 2009, with the target to enrol 100 European airports by 2013. To date, commitments have been given to implement CDO at 83 airports across 23 European States. Of these airports, 33 already offer CDO at some point in the day and 13 are currently carrying out flight trials.
3. Similarly, the introduction of the Point Merge System on 7 April 2011 at **Oslo Gardermoen Airport** required close cooperation between air traffic controllers, pilots and the airport operator. This leads to safer operations, optimized capacity and less noise and greenhouse gas emissions.

² Continuous Descent Approach Implementation Guide Information - Eurocontrol
http://www.eurocontrol.int/environment/gallery/content/public/documents/cda_brochureA4_may08_web.pdf

The implementation of CDO, taking into account local circumstances should be a priority for all stakeholders, in the context of the implementation of the Balanced Approach to aircraft noise management.

However, like any other aviation stakeholders in Europe, airports are lacking a clear policy direction at EU level that defines where the priorities lie between different environmental impacts. Indeed, noise preferential routes can actually result in flying a longer distance or the use of a preferential runway can impose a longer taxiing time, with an adverse impact on CO2 emissions and local air quality. ACI EUROPE believes that this also needs to be taken into account when formalizing policy priorities at EU level.

D) Operating restrictions

1. One of the objectives of Directive 2002/30 is to provide a level-playing field on operating restrictions at EU airports. In line with its tradition of progressive environmental policy, ACI EUROPE suggests that any plans for a revision of Directive 2002/30 also includes an update of the definition of the noisiest aircraft. Taking into account the current situation at European airports, we believe that the Directive could create the framework for the phase-out of -8 EPNdB marginally compliant chapter 3 aircraft.
2. Also, while the modalities for the phase-out of marginally compliant chapter 3 aircraft are very clear, ACI EUROPE believes that the elements related to partial operating restrictions deserve further clarification.

Should Directive 2002/30 be revised, ACI EUROPE suggests that it focuses on further clarifying the requirements of Annex II. In particular, Annex II should be more specific on the content of the impact assessment and the designation of responsible authorities. It should include the impact of the measures assessed on safety, capacity, trade-offs with other environmental aspects (e.g. emissions), social and economic aspects.

Also, airports should be directly involved in the impact assessment studies so that they can provide their expertise.

The consultation process and governance

5. An underpinning principle of a successful consultation process is a high level of sustainability. By this, we mean looking at the airport in relation to society, aviation and the community and ensure that this relationship is as stable as possible, thus providing business certainty and long term planning security to operators and a clear framework to citizens.
6. The consultation process at **Vienna Airport** is often considered as the most mature politically. However, this does not mean that the agreement reached at the end of the consultation process is applicable to other airports. On the contrary, the success of the consultation procedure in Vienna relies on the fact that it took account of the peculiarities of the local situations. The whole process took 5 years.
7. The impact assessment at **Düsseldorf Airport** was extremely demanding and certainly one of the most scientifically-based. However, it took 30 years to obtain approval for a parallel temporary runway. It is worth questioning the amount of

resources that the airport had to put in this 30 year process. Such decision has a strong impact on airports' development strategies, competitiveness and business predictability.

European airports are confronted to similar obstacles when trying to come up with a meaningful and efficient set of noise mitigation measures. In order to overcome part of these obstacles, the following measure should be implemented:

- Build a common source of noise certification data on which all airports could base their assessment;

Noise being a local issue, building a trusting relationship with communities surrounding airports is a key priority for the airports' management. Inconsistency of information could question the airports' relationship with local communities.

- European citizens should be able to better identify competencies and associated responsibilities;

- Data provided should be consistent (link with Directive 2002/49: noise maps and action plans);

- There should be visibility over the airports' plans;

- Information provided to citizens should be transparent.

8. In some cases, the Directive is a useful instrument for airports that are confronted with contradictory norms. The existence of Directive 2002/30 enabled **Brussels Airport** Authorities to make a case to show the necessity to conduct a thorough impact assessment before the Regional authorities considered introducing operational restrictions.

9. In Sweden, the Environmental Court has decided to implement an operational restriction on **Stockholm Arlanda's** 3rd runway. From 2018 onwards, no aircraft arriving from the South will be allowed to land, which results in a restriction in operations. Directive 2002/30 was not used in this case, since Swedish authorities understood that Directive 2002/30 was applicable to only one type of restriction, i.e. the withdrawal of operations of marginally compliant aircraft. It was assumed other restrictions were not regulated and could be introduced by an authority without any consultation or prior impact assessment.

The Directive should allow for an unbiased discussion between all stakeholders involved in the decision-making and the consultation process. It is also essential to clearly assign responsibilities, i.e. the respective obligations of airports and authorities. As a result, the Directive should be a reference document for airports.

Conclusions

1. One essential element of the existing Directive is the airport-by-airport approach to noise. ACI EUROPE urges the European Commission to preserve this principle.
2. Land-use planning is a pre-requisite to successful airport development.
3. ACI EUROPE supports a higher level of stringency in the definition of marginally compliant aircraft of - 8 EPNdB compared to chapter 3.
4. Cooperation between all stakeholders is a pre-requisite to an effective noise mitigation policy.
5. Inhabitants should be provided consistent and transparent information.
6. Effective noise mitigation policy should take full account of possible environmental trade-offs (CO₂ and emissions).