

## Airlines for Europe's contribution to the Call for evidence for the evaluation of the Balanced Approach Regulation

### Framing the issue

Air connectivity underpins the progress of Europe's economy and the wellbeing of its societies: it supports 14 million jobs and 5% of European GDP, the development of tourism and trade, and keeps European citizens connected.

To achieve Europe's climate and environmental ambitions, joint action is much more effective than a patchwork of different national policies and measures. Environmental efforts must go hand in hand with the protection of the integrity of the Internal Market.

Airport capacity, connectivity, local noise concerns and sustainability goals are not mutually exclusive but must be addressed together. The continuing, uncoordinated imposition of capacity constraints risks forcing airlines to forfeit historic slots, divert traffic or stop flying altogether: Europe must not allow fragmented noise policies to reduce air connectivity, and harm the competitiveness of its aviation sector, the global position and strategic autonomy, and the socio-economic benefits that come with it.

The effects of noise emissions are a challenge for all transport modes. Airlines are heavily investing in actively fleet renewal and work with airports and Air Navigation Service Providers to improve flight paths and the efficiency of operations. Via airports, airlines are also funding housing insulation programmes. All measures taken by airlines and airports combined will deliver a 37% reduction in the number of people highly annoyed by aircraft noise by 2030, according to the European Environment Agency. For the sake of comparison, over the same timeline, the number of people highly annoyed by rail noise is projected to increase by 35%.

### **The Balanced Approach and Regulation 598/2014 must remain the guiding rule**

The Balanced Approach as set out in the Regulation prescribes a thorough process to ensure that noise-related decisions are adequately informed, built on robust analysis, and taken after transparent consultation of relevant stakeholders, so that such measures are fit for purpose by design, before they are enacted, and no predetermined outcome is allowed.

A4E airlines stand behind the principle that of all the available noise reducing measures, the cut of flight movements and other **operating restrictions must remain the last resort**.

The objectives set within the Balanced Approach framework should be reasonable, achievable, and proportionate to the actual noise impacts observed around each airport. Measures should

not be permanent, but their effectiveness should be monitored, evaluated and adjusted against their effective contribution in reaching the noise reduction targets. Not all airports are alike: noise issues must be assessed on a case-by-case basis, while maintaining strict alignment with ICAO agreed principles.

### **An effective safeguard against rushed decisions**

The Balanced Approach ensures that addressing noise emissions at EU airports remains based on transparent, reliable, objective and measurable criteria, and contains fundamental procedural safeguards:

- All measures must be assessed against a clearly established environmental target, so that the noise abatement objective is defined before starting the assessment itself.
- Technical cooperation to examine mitigation measures must be established between relevant stakeholders (airports, airlines and ANSPs primarily).
- Any combination of measures shall not be more restrictive than what's necessary to achieve the noise objective.
- The cost-effectiveness of any new operating restriction must be assessed, duly taking account of the contribution of each noise-reducing measure before operating restrictions are introduced.
- Operating restrictions shall never discriminate and shall not be arbitrary.
- Member States must take into account observations made by the European Commission.

However, Member State governments and authorities have often disregarded the Balanced Approach by introducing operating restrictions at airports and:

1. Omitting notifications required under Article 8 of Regulation 598/2014.
2. Disregarding cost-effectiveness analyses, neglecting land-use planning, and failing to conduct stakeholder consultations.
3. Applying the procedure in widely varying and sometimes inconsistent ways, undermining its value and effectiveness.

**Specific examples** show that the Balanced Approach Regulation remains necessary, relevant, efficient and keeps adding European value:

- Movement restrictions at **Schiphol Airport**

In 2022, the Dutch government announced plans to cut annual aircraft movements at Schiphol Airport to 440,000, equivalent to a 12% reduction, without first launching the required procedure under the Balanced Approach, which was done only at a later stage.

It quickly became evident – from government policy documents – that the capacity reduction to 440.000 movements was a political objective from the outset, instead of a carefully evaluated, necessary and proportionate measure. Further, the noise target was not set until long after the traffic shrinkage was formulated as an objective, nor were relevant stakeholders consulted until a year after the measure was announced. The determination of the actual noise situation in accordance with the ECAC method did not precede any procedural step mandated by the Balanced Approach and relied instead on outdated parameters. Thus, the entire process seemed geared towards a pre-determined outcome, as the analysis of the actual noise situation, the formulation of the noise target, the reference year and the short duration for achieving the target, and the consideration of possible measures, were all shaped to fit the 440,000 flight movements reduction.

In its Decision of 5 March 2025, the European Commission identified several shortcomings in the Balanced Approach process for Amsterdam Schiphol, specifically noting an only partial consideration of fleet renewal and an insufficient assessment of noise-reducing flight procedures.

- The environmental permit for the operation of **Brussels Airport**

The regional government issued a renewed environmental permit for the operation of Brussels Airport in March 2024. The environmental permit introduced a movement cap and unprecedented noise-reduction targets without carrying out the mandatory procedural steps under the Balanced Approach. These measures were proposed without consulting stakeholders, and evaluations were to be carried out only ex-post. On appeal from airlines, the Council for Permit Disputes annulled the environmental permit as it did not respect the procedure laid out in the Regulation.

- Night-time restrictions at **Dublin Airport**

Measures proposed by the national independent planning commission in a draft decision issued in September 2024 included a noise quota in conjunction with a night-time annual movement cap of 13,000. This cap, which would have meant a 60% reduction of operations with no regard to any cost-benefit analysis, was a very restrictive measure that should have been evaluated under the Balanced Approach as transposed into Irish law. The proposal also diverged from the conclusions of the Dublin Airport noise expert regulator ANCA, which supported a noise quota system without a movement limit.

The proposal went beyond the requirements of the relevant noise abatement objective and thus lacks both the compulsory analysis of less restrictive alternatives, as well as a proper assessment of the economic impact of the measure on the airport's and on the Irish economy more broadly.

It made no consideration of investments from airlines in quieter aircraft, nor of constraints in airlines' operations, especially of interconnectedness of night and day operations. The proposed measure would decimate first-wave operations (departures between 06:00 and 06:59 am) which are critical and ensure aircraft return in time before the start of the night period.

The Irish planning commission issued its final decision in July 2025 in which it affirmed the implementation of a noise quota scheme but retained an annual movement cap, albeit at an increased level of 35,672 movements. This decision was challenged in court by Aer Lingus and Ryanair on several grounds including a failure of the planning commission to comply with the requirements of the Balanced Approach. Airlines consider that a movement cap is unnecessary and undermines the objectives of a noise quota system by removing any incentive to replace older aircraft with newer and quieter aircraft once the movement cap is reached. Parties were due to be heard in January 2026, and in the meantime the European Commission raised questions with the Irish planning commission in relation to the compliance of its decision with the Balanced Approach. With its Decision of 10 February 2026, the European Commission notified Irish authorities that the proposed operating restrictions did not follow the process set out in the Balanced Approach regulation.

- In **France**, 10 Balanced Approach procedures have been launched since 2022

As they now stand at different stages of completion, airlines and airports note considerable differences in the methodology used for each procedure. Across all ten, however, the focus has largely been on introducing additional operating restrictions, with insufficient consideration of the benefits brought by measures from other "pillars" in the Balanced Approach.

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Airlines see great value in a framework that provides independent oversight, applies horizontally across the EU single market, reduces the risk of international disputes, avoids unnecessary litigation costs, prevents losses in connectivity and minimises detrimental impact on consumers coming from less choice and higher fares.

The EU's Balanced Approach needs to remain coherent with global approach under ICAO rules, and with EU's priorities on competitiveness, while aiming for the EU's noise reduction objectives.

### **Do not miss this opportunity!**

The evaluation of the Regulation should focus on the full and consistent respect of the Balanced Approach across the EU and the EEA. It is an opportunity to recognise once again that airport capacity, connectivity, local noise abatement and sustainability are not mutually exclusive, but

must be addressed together to safeguard Europe's long-term competitiveness and global position – while at the same time ensuring a non-discriminatory, equal and fair treatment of all transport modes when it comes to noise management.

European airlines reiterate their **call on the European Commission** to

- Enforce the provisions of Regulation 598/2014 more effectively and more robustly at all stages of the balanced approach,
- Reaffirm its oversight role by issuing clear guidance to Member States, stipulating that any measure must be explicitly justified against an achievable noise reduction target, be non-discriminatory and proportionate,
- Actively monitor and address cases of non-compliance by member state authorities and other stakeholders, and
- Champion the work of ICAO's Committee on Aviation Environmental Protection (CAEP) to promote global consistency, while ensuring that notified procedures in the EU follow ICAO agreed policies.

And **call on EU Member States** to

- Ensure that all Balanced Approach procedures are evidence-based, inclusive, and transparent, with measures that are relevant to the total noise impact reduction objective, and assessed based on ICAO's Document 9829,
- Ensure that operational restrictions are considered as a last resort,
- Promote and uphold and data-driven technical analyses, setting clear baselines that remain the reference point throughout,
- Refrain from taking ill-advised, rushed decisions on a short timeframe that endanger air connectivity and negate its economic and social benefits, and
- Adopt and enforce effective land-use planning policies that prevent inappropriate residential developments in noise-sensitive zones.