

Ministry of Infrastructure & Water Management
For the attention of Minister M.G.J. Harbers
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Schiphol's views on modified Balanced Approach measures package

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Dear Mr Harbers,

Royal Schiphol Group N.V. (Schiphol) has taken note of the modified package of measures from the Ministry of Infrastructure and Water Management for the ongoing Balanced Approach (BA) procedure submitted for public consultation on 24 May 2024. Schiphol would like to take the opportunity to submit its views on the modified measures proposed.

Summary

Schiphol's views on the proposed package of measures is that it is a step in the right direction. It includes a wider range of measures than the original package, with two important measures from Schiphol's 8-point plan: (1) prohibiting the noisiest aircraft, and (2) a night curfew.

However, Schiphol does call attention to a number of issues that are important in putting together the final package to be submitted and legislated, the most important of which are:

- Schiphol's analysis shows that the proposed measures to limit secondary runway use involve operational risks that make them impractical. Schiphol also notes that the positive impact of this measure on local residents is overestimated.
- Schiphol asks for a swift decision on a form of night curfew.
- Schiphol requests that the restriction on private jets at the airport be included in the final package.

Our views

First of all, Schiphol considers the currently proposed package of measures as a step in the right direction to achieve a better balance between Schiphol and the surrounding environment. Restoring that balance was reason for Schiphol to present its own 8-point plan on 4 April 2023, which includes a number of concrete measures to limit noise nuisance for local residents. Schiphol notes that the amended proposals that are now in place incorporate important parts of its 8-point¹ plan and its previous views² submitted on 16 June 2023.

¹ <https://news.schiphol.com/schiphol-to-be-quieter-cleaner-and-better-night-closure-ban-on-private-jets-and-people-first/> (4 april 2023).

² <https://news.schiphol.com/less-hindrance-as-a-result-of-a-curfew-and-banning-the-noisiest-aircraft-and-private-jets/> (16 juni 2023).

Schiphol also supports the inclusion of a broader range of measures in the adjusted package of measures, such as additional fleet renewal. The Ministry has thus placed a clearer focus on the nuisance objective, which makes this adjusted package more balanced than the original one. Schiphol also endorses a more phased introduction of the proposed measures, because according to such an approach the Balanced Approach procedure leads to better outcomes. Schiphol expects that the result of this Balanced Approach can and will soon be laid down in Dutch legislation, because the lack of a legal basis for the airport's operations has been a concern for some time, partly in view of developments in case law. Everyone – the aviation sector and local residents – benefits from clarity in the short term.

Below, Schiphol provides its point-by-point views on each of the proposed measures in the amended package of measures:

- *Less secondary runway use.* Schiphol's analysis shows that there are two major operational risks when introducing the measure, which makes the measure unfeasible. Firstly, delays occur if airlines are unable to move aircraft movements to another time of day. Moving these flights also means shifting arrival and departure times of airports abroad. This is a complex puzzle for airlines. If airlines are unable to move aircraft movements to another time of day, it will lead to major delays because flights have to wait until a runway is available after 3:00 PM. Secondly, the impact of disruptions becomes much greater. Because flights between 1:00 PM and 3:00 PM have to be moved to another time of day, there is less room in the rest of the schedule. Analysis by Schiphol shows that a snowball effect would occur in the event of disruption in the morning, and delays would easily last 1.5 to 3 hours longer. Schiphol also notes that the positive impact of this measure on local residents is overestimated. Because flights must be moved, secondary runway use increases at other times of the day. This effect is not included in the Ministry's estimates of the impact.
- *Charges differentiation.* First of all, Schiphol notes that the actual impact of airport charges differentiation is different and may be greater than the Ministry's impact analysis shows. Secondly, it is important that the authority to determine (differentiated) charges and conditions lies exclusively and independently with Schiphol as the airport operator, as was also explained by Ministry officials during the recent information meeting of 30 May 2024. The consultation procedure is currently underway under the Aviation Act to arrive at new charges and conditions for the period 2025-2027. Because this procedure has not yet been completed and Schiphol has not yet received the airlines' views on its proposals, the outcomes of this procedure cannot yet be anticipated. This also applies to the (degree of) differentiation of charges based on noise (and its possible effects on noise nuisance for local residents). Schiphol would like to point out a number of concerns it has with the supporting documentation that the Ministry has shared in this context, and which concern the methodology followed (particularly from *Decisio & Beelining 2024*):
 - The calculated effects are the result of the assumptions regarding the degree of differentiation, the intended aircraft categories and the resulting behaviour of airlines. Schiphol believes that the calculations therefore do not provide a realistic prediction of noise effects, which could be (much) greater under other assumptions. For example, it is unclear what the presumed charge increase is that was used in the calculations for the noisiest aircraft.
 - Furthermore, under the Aviation Act, a differentiation of charges must be "revenue neutral", because it is cost-oriented across the entirety of the charges. From that starting point, it is strange that the impact on airline costs has been determined as greater than zero. Finally, it is unclear to what extent the consultants have taken into account the fact that many visiting airlines at Schiphol have alternative, more sustainable aircraft available in their fleet and could therefore quickly switch to quieter aircraft.
- *Prohibiting noisy aircraft.* Schiphol supports the measure to ban noisy aircraft at night as it is now included in the amended package of measures. In addition, Schiphol believes it is important that there is room for cargo traffic at Schiphol, provided it is cleaner and quieter. Schiphol requests that this measure also be introduced during the day. Schiphol would like to discuss this with the European Commission.
- *The night curfew.* Schiphol advocates speedy decision-making regarding a form of night curfew as soon as the results of the impact analysis are known, or to make the proposal that Schiphol made in its views of 16 June 2023 for a night curfew part of the overall consideration of the package to be definitively submitted. Based on the system and principles of the Balanced Approach Directive, a night curfew should be considered before measures that limit the capacity of the airport, because a night curfew is more cost-effective than a reduction of the total number of aircraft movements.

In addition, Schiphol requests that the following two measures be added to the final package of measures to be submitted and laid down by law, as it believes they are necessary to achieve the most balanced package.

- *Private jets.* Firstly, Schiphol requests that a limitation on the number of private jets at the airport be included in the remainder of this procedure. Schiphol refers to what it included in its previous views³ and to the opinion of KLM⁴. Schiphol would like to discuss this with the Ministry.
- *Environmental Fund.* Secondly, Schiphol asks that the package also include other measures that Schiphol is taking. For example, until 2030 Schiphol will make available an annual Environmental Fund of 10 million euros for innovative building concepts, home insulation and area development that will also contribute to improving the quality of life of those living near the airport.

Schiphol hereby hopes to have provided you with sufficient information to enable you to make a balanced assessment of Schiphol's future.

Sincerely,
Royal Schiphol Group N.V.



Robert Carsouw
Executive Vice President & CFO

³ <https://news.schiphol.com/less-hindrance-as-a-result-of-a-curfew-and-banning-the-noisiest-aircraft-and-private-jets/> (16 juni 2023).

⁴ <https://nieuws.klm.com/klm-group-presents-plan-ensuring-greater-reduction-in-night-time-noise/> (15 juni 2023).