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Response to additional consultation Balanced Approach Schiphol

In view of the consultation “Consultation Balanced Approach Schiphol” to reduce noise in the vicinity of Schiphol Airport, launched by the Ministry of Infrastructure and Water Management of the Netherlands for comments by 21 June 2024, Ryanair hereby presents its comments.

Principles of the ICAO Balanced Approach

The Balanced Approach, as enshrined in the Convention on International Civil Aviation ('Chicago Convention'), and the EU Noise Regulation No 598/2014 (the 'Noise Regulation'), known as the “Balanced Approach Regulation”, aims to ensure that decisions on airport noise abatement are taken only after a careful process, essentially based on the identification of a specific noise problem based on established facts, transparent consultation of stakeholders, and a systematic and detailed review of all available noise abatement options.

As mentioned in the consultation documentation, the Balanced Approach involves the exploration of various noise abatement measures, which can be classified under four principal pillars, namely:

- reduction of noise at source;
- land planning and management;
- operational procedures, and
- operating restrictions,
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The latter is used only as a last resort. However, the consultation documents show that fundamental elements of the Balanced Approach have been ignored or misapplied. Operating restrictions are unnecessarily contemplated as other options are available, amongst which the use of Quota Count as Sole Control.

Benefits of Night Flying

There are many social and economic benefits of night flying that should be reflected within any Balanced Approach to night-time noise management. Night flying is often driven by demand and consumer preferences. Key benefits of night flying that are of relevance in this work include:

- It enables business passengers to maximise their working days and minimise overnight stays, thus supporting productivity and making the Netherlands an attractive place to do business;
- It allows leisure travelers to maximise their time at their destination, which applies equally to those inbound to London as it does to outbound leisure passengers. For inbound visitors, this can make the Netherlands more attractive as a place for high-value short-stay visits;
- It means airlines can maximise their fleet utilization and, therefore, reduce operating costs overall with those benefits passed on to consumers through lower fares;
- It adds to capacity at airports;
- It allows business users to arrive early in the working day at their destinations across Europe and to arrive back home after the working day at this destination; and
- It enables cargo airlines to meet users' needs for guaranteed delivery times and next business day deliveries, supporting the Netherlands' position as a place to do business.

Ryanair opposes to blunt instruments such as night closures and movement reductions to manage noise. Night movements are essential in aviation, particularly for short-haul low-fares operators who are required to operate throughout the full 24 hrs to ensure that we, as low-fares operators, can offer consumers more choices and lower fares.

Use of Quota Count as Sole Control?

It is unclear to us why the Ministry has not chosen Quota Count as Sole Control. The Quota Count (QC) point calculation method for flights involves allocating points to aircraft movements up to a single night point limit. Aircraft taking off from and landing receive a specific QC point value between from 0.13 to 16.00 depending on acoustic parameters, based on aircraft noise certificates submitted by carriers.

Given the negative economic impact and ineffectiveness of a movement limit as a mechanism to control noise, and the likelihood that it may actually discourage airlines from moving to newer aircraft, then an alternative approach that focuses more on the noise impacts of individual aircraft would be better at maximising the economic value to the Netherlands and balancing this with the impacts on local residents.

This same realization has resulted in other relevant authorities, in terms of the imposition of noise related operating restrictions, seeking alternative primary controls, which increasingly sees a shift towards the use of QCs as the sole control measure. This reflects that the approach will best encourage airlines to use quieter aircraft in order to grow their operations and should, with appropriate limits on the maximum QC values permitted, reduce single event disturbance and move the noise impact more towards the average assessment criteria.

Examples of where QCs are currently, or shortly will be, the primary control of noise include:

Dublin Airport – which like Schiphol serves a capital city. Ryanair is also, clearly, a significant operator at Dublin, operating a high proportion of night movements;

Hong Kong International Airport which opened in 1998, later than the UK's implementation of the joint QC/Movement limits. It is likely that these controls recognized the ineffectiveness of the movement limit as originally identified by the UK Government as a means of incentivizing quieter aircraft;

Warsaw Chopin which is located within a heavily built-up area close to the centre of Warsaw and surrounded by residential suburbs;

Munich Airport which has a total night ban on commercial movements but uses a QC system to control movements which are exempted from this. In the context of a decision not to allow night flying, it is interesting that the QC system has been identified as the best control measure in what will be a heightened noise sensitive environment given the low overall level of flying.

Using the QC system as the sole control would put Schiphol in a better position relative to a number of peer airports for the deployment of new-generation aircraft. Furthermore, it is likely to put it ahead and make it more attractive to the airlines, as they will be assured of maximum flexibility to grow, provided they adjust their fleets towards newer-generation types in order to do so.

Based on this, Ryanair's comments on the measures in the suggested new package are as follows.

Phase 1 - 2024

Quieter aircraft at night (between 23:00 - 07:00)

Ryanair favours the use of quieter aircraft but suggests using a QC system as a sole control.

Phase 2 - 2025

Airport charges for noisy aircraft become more expensive (new)

Ryanair is against differential charging and penalties as too bureaucratically complex to administer and enforce.

Excluding the noisiest aircraft at night (new)

Ryanair supports a ban on noisy aircraft at night (QC rating of 1+) but also requests the airport takes further mitigation actions where possible (e.g., noise insulation for impacted residents).

Less use of runways near densely populated areas

This is an option as long as it has no operational or economic impact for operators.

More aircraft replaced with new ones (new)

This is why Ryanair suggests using a QC system as sole control.

Fewer flights at night - maximum of 27,000 flights per year and Lower total number of flights - maximum between 460,000 and 470,000 flights per year

Ryanair is against this movement restricting measure for the reasons stated above, and once again emphasises that the use of a QC system as sole control is the better option.

Phase 3 - 2026

Partial night-time closure or other night-time measures (new)

Although a separate process will follow for this phase with a separate consultation at a later stage Ryanair already can announce that it is against this measure and suggests the use of a QC system as sole control.

In addition, while “slot-related measures” are not defined in the consultation document, our position is that the Dutch Government should not interfere with Ryanair’s property rights and provide quiet enjoyment of the slots allocated to her.

Conclusion

To conclude, Ryanair cannot support the measures put forward within the consultation documentation. Ryanair urges the Dutch Ministry to refrain from implementing movement restrictions without further analysis of the economic effects of such measures and to intensify the work on solutions in line with the balanced approach to mitigate the noise situation at Amsterdam Schiphol airport, following a thorough assessment of the noise situation at hand, in accordance with Annex I of the Noise Regulation. A QC system as sole control should be considered before more drastic measures are contemplated.

Ryanair is available to discuss our feedback in person and provide further information on our express business and its relevance to the Dutch economy.