



To the Ministry of Infrastructure and Water
Management

Paço de Arcos, 14 de June de 2024

Ref: NetJets response to Schiphol Airport Balanced Approach Consultation

Introduction

NetJets Transportes Aéreos, S.A. ("**NetJets Europe**") is a Portugal incorporated company with registered company and fiscal number 504 709 461, holder of a Portuguese aircraft operator certificate ("**AOC**") PT-01/02 and operating license.

Following the 2022 Dutch cabinet decision to reduce the impact of Schiphol airport ("**AMS**") on the environment and the consequent decision to reduce the total number of aircraft movement at AMS, NetJets Europe has been deeply involved in this matter. Please note that any change in NetJets Europe's access to AMS will result in a meaningful impact not only for NTA but also for businesses on or around AMS and, ultimately, the Dutch economy.

Balanced Approach (B.A.) additional consultation

Schiphol Airport has proposed a set of noise abatement measures to be implemented in phases from 2024 to 2026 to reduce the airport's environmental impact.

These measures include quieter aircraft requirements at night, increased airport charges for noisy aircraft, exclusion of the loudest aircraft at night, reduced use of runways near densely populated areas, fleet renewal incentives, fewer night flights, and a lower total number of annual flights. A partial night closure or alternative night-time measures are also being considered for 2026.

NetJets Europe's position to the B.A. measures

As a non-scheduled operator, NetJets Europe must analyse the potential impacts of these measures on our operations and propose solutions to mitigate any adverse effects. NetJets Europe's participation in this Balanced Approach consultation addresses the critical concerns of operational impact, fairness of treatment, and adequacy of the measures while suggesting adjustments to ensure our continued efficient operations at AMS.

B.A. operational and financial impact

The proposed reduction in total annual flights from the current 500,000 to between 460,000 and 470,000 by 2025 may result in NetJets Europe's loss of business and a reduction to its annual number of flights access to Schiphol Airport.

We are obligated to stress that reduced access of NetJets Europe to AMS would have a tremendous economic impact on the city of Amsterdam and surrounding areas. For your reference, NetJets Europe's externalities of around AMS (sum of the last 3 years) are as follows:

Maintenance/Parts: ~10M€

Airport Services/Fuel: ~9,5M€

Hotels/Taxi: ~2.1M€

Crew salaries: 20M€

Please note that the majority of our customers fly to and from Schiphol airport for business purposes, and any applicable restriction to NetJets Europe's access to AMS would most likely impact the Dutch economy.

B.A. - NetJets Europe suggested amendments

1. Rules on allocating the number of flights for each operator.

To minimise the impact referred to above, we propose implementing exemptions or a separate quota for non-scheduled flights.

If such a separate quota is not feasible, then due to the proposed reduction of annual flights, we recommend that the reduction of flights needs to be embraced by all operators and types of flights in equal measures.

To ensure fair treatment, NetJets Europe suggests:

- Ensuring that the reduction in total annual flights is fairly distributed among all operators, including commercial (regular and non-regular), cargo, and private flights. Advocate for a transparent and proportional reduction strategy where each type of operator is assigned a fair and pro-rata share of the flight reductions. This could be based on historical flight volumes, ensuring that no single operator category is disproportionately affected.
- Advocate for a more balanced approach that does not disproportionately affect non-scheduled operators.

2. Recognise and commend quieter air carriers.

In reviewing the measures proposed, focusing on the impact the noise an aircraft can have on the local communities, NetJets Europe proposes the following, in addition to what is included in the current proposal and to motivate the operators' investment for quieter aircraft:

- Provide priority slot allocation for quieter aircraft.
- Reduce airport charges for air carriers operating quieter aircraft.

3. Promote and invest in noise mitigation measures.

The Knowledge & Development Centre - KDC (whose members are Amsterdam Airport Schiphol (AAS), Royal Dutch Airlines (KLM) and Air Traffic Control The Netherlands (LVNL)) requested from the to70 aviation consultants a review on the impact of steeper approaches at Amsterdam. Of the scenarios considered, *"All scenarios show benefits, and the magnitude is significant."*

Therefore, there is a benefit in investing in steeper approaches, designs and eventual implementation. As the to70 aviation consultants review concludes, these would reduce the noise observed and felt by the local communities. The operators who can comply with these approaches should also be recognised as per suggestion #2.

4. Increase implementation deadlines (to after 2026) for a safe implementation of new noise mitigation measures.

While AMS has likely invested significant time and resources in developing the proposed measures, it is still worth reviewing adjustments that could benefit both the airport and non-scheduled operators. Any adjustment would need to have an adequate risk assessment to review any safety implications. Taking this into consideration:

- NetJets Europe suggests a more gradual implementation timeline for operators to adapt their fleets and operations.
- This will also allow the airport, ATC, and operators to develop, implement, and train to embrace new, steeper approaches.
- Propose incentives, as referred to previously, for operators to invest in quieter and more efficient aircraft.

Conclusion

NetJets Europe acknowledges Schiphol Airport's intention to reduce the noise impact of its operation.

The measures proposed for implementation may bring benefits to ensure the airport's sustainability goals. Still, they must be carefully applied to avoid unintended consequences for the aircraft operators affecting competition and cause potential discrimination. Open communication and collaboration with Schiphol Airport authorities will be vital to finding mutually beneficial solutions and ensuring the long-term success of our operations.

We believe that implementing points 1, 2, 3, and 4 could better achieve the ultimate goal of reducing noise.

- Fair Flight Reduction: ensure a proportional flight reduction among all operators, including commercial (regular and non-scheduled), cargo, and private flights. Advocate for a transparent and fair reduction strategy based on historical flight volumes.
- Quieter Air Carriers: allocate priority slots for operators of quieter aircraft and offer reduced airport charges for them.
- Noise Mitigation: invest in steeper approaches, which have been shown to reduce noise significantly. Recognise operators who comply with these approaches.
- Increase implementation Timeline: gradually implement new noise mitigation measures after 2026 to allow for adequate adaptation and training. Offer incentives for operators to invest in quieter and more efficient aircraft.

NetJets Europe is open to engaging and working with Schiphol Airport or local groups to test and develop solutions.

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