



Schiphol Balanced Approach Consultation Response

I. Introduction

Emirates Airline (EK) appreciates the opportunity to respond to the Balanced Approach consultation conducted by the Netherlands Ministry of Infrastructure and Water Management. In the 2022-23 financial year, Emirates operated a comprehensive global network encompassing 150 destinations across 80 countries on six continents with a fleet of 260 wide-body aircraft, independent of the global airline alliances. The Emirates aircraft fleet is composed mainly of Airbus A380 and Boeing 777 aircraft, with just one narrowbody aircraft, an Airbus A319, which is primarily used for passenger charter flights.

Emirates has been a prominent contributor to Dutch air connectivity since 2010, when it inaugurated daily service to Amsterdam Schiphol (AMS). Over the years, Emirates has gradually increased its capacity to align with the growing demand. To date, Emirates has facilitated travel for over 5.4 million passengers on flights to and from Amsterdam. Currently, the airline maintains its pre-COVID service levels with 19 weekly frequencies to the city.

In addition to the belly cargo space available in the wide-body passenger aircraft, Emirates SkyCargo initiated scheduled freighter services to Maastricht (MST) in 2018. Presently, Emirates SkyCargo operates two weekly services to MST and 11 weekly services to AMS. The widebody capacity provided by Emirates, encompassing both passenger and freight transportation, plays a vital role in serving the AMS-Dubai (DXB) market. Furthermore, the seamless connections beyond DXB offered by Emirates contribute to Amsterdam's overall network quality, providing convenience and shorter travel times for passengers.

The consistent deployment of wide-body aircraft by Emirates also leads to an increase in the average number of passengers per flight, resulting in a more economically efficient and environmentally effective use of limited slots. Notably, in the 2022-23 financial year, Emirates carried over 500,000 passengers on the DXB-AMS route, achieving a high seat factor of 83%.

Emirates remains committed to operating year-round services with 19 weekly flights using B777-300ER and A380-800 aircraft to and from Amsterdam Schiphol Airport (AMS). The airline looks forward to expanding its services to at least 21 weekly flights throughout the year. This commitment enables Emirates to offer extensive network connectivity, foster competition, and provide affordable air travel for passengers originating in the Netherlands and travelling worldwide. Moreover, it facilitates the inflow of visitors from various parts of the world to the Netherlands for business, tourism, and other purposes. Emirates' passenger services, combined with its cargo freighter operations, significantly contribute to the Dutch economy.



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Emirates is committed to minimising the environmental impact of our operations across all our businesses and activities. Our Environmental Sustainability Framework focuses on reducing emissions, consuming responsibly, and preserving wildlife and habitats, and we support the International Air Transport Association's collective industry commitment to reach net zero carbon emissions by 2050.

II. Emirates' feedback on the combinations of noise reduction measures

A. Combinations of noise reduction measures as presented in the consultation document:

Combination B:

- Reduce secondary runway use
- Extend night regime (evening + morning)
- Reduce use of Buitenveldert Runway
- Encourage airlines to use quieter aircraft
- Reduce capacity to 440k overall / 29k night flights

Combination C:

- Reduce secondary runway use
- Extend night regime (evening + morning)
- Reduce use of Buitenveldert Runway
- Encourage airlines to use quieter aircraft
- Reduce capacity of night flights to 25k (500k overall)

Combination D:

- Extend night regime (evening + morning)
- Encourage airlines to use quieter aircraft
- Reduce capacity to 440k overall / 29k night flights

B. Emirates' feedback on individual noise reduction measures (within the above combinations):

- i. **Noise-preferential runway use** (including 'Reduce secondary runway use' and 'Reduce use of Buitenveldert Runway'):

Regarding the proposed noise-preferential runway system and the selection of the far west runway (RW18R/36L - Polderbaan) as the preferred option, we would like to provide the following feedback and justification:

- a. **Increased taxi times:** Selecting the far west runway as the preferred option will result in increased taxi times for aircraft parking just south of runway 09/27 (Buitenveldertbaan). This



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could further result in operational delays and impacts on efficiency.

- b. **Fuel consumption:** Considering the potential increase in taxi times, it is crucial to assess the associated fuel consumption and environmental implications. Estimates indicate that an additional fuel burn of approximately 1.5 tonnes per day may occur if the far west runway is predominantly used. These estimates are based on an average extra taxi time of 10 minutes for each flight, multiplied by the fuel consumption rate of 60 kg per minute for the A380 and 40 kg per minute for the B777.
- c. **Cost considerations:** The additional fuel burn resulting from increased taxi times can lead to increased operational costs for airlines, which have to be taken into account in fare pricing.
- d. **Balancing noise reduction and efficiency:** While selecting a runway with the least noise impact is commendable, it is crucial to strike a balance between noise reduction measures and operational efficiency. The potential increase in taxi times and fuel consumption should be carefully evaluated against the noise reduction benefits achieved by utilising the preferential runway system.

In conclusion, it is recommended that the Ministry carefully assesses the trade-off between noise reduction and operational efficiency when considering the selection of the far west runway as the preferred option. The potential increase in taxi times and associated fuel consumption should be weighed against the noise impact reduction achieved. It is crucial to find a balance that minimises noise pollution while minimising adverse effects on operational costs, fuel consumption, and environmental factors.

ii. **Extension of night regime:**

- a. Emirates considers the current night regime, which spans from 2240LT to 0640LT, to be adequate.
- b. Emirates does not support the proposed extension of the night regime as it would have a negative impact on the historical arrival and departure slots at AMS, particularly within the one hour before and after the current night regime time-band.
- c. The lack of flexibility in slot re-timing would put airlines operating close to the border hours of the night regime at a



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disadvantage. Any attempt to proportionately re-accommodate them in other hours would result in a ripple effect, affecting airlines in adjacent time slots as well.

- d. If the extension of the night regime is still under consideration, Emirates suggests that airlines operating daily, year-round services with large seat capacity (Code E and F) aircraft should be exempted and allowed to retain their existing historic slots. These flights play a crucial role in transporting a substantial number of passengers while minimising the overall aircraft movements, thereby striking a balance between the economic objectives of network connectivity, affordable air travel, and noise reduction measures.

iii. Encourage airlines to use quieter aircraft:

- a. Airlines utilising noise-efficient aircraft should be encouraged and incentivised to retain their existing historic slots.
- b. This approach showcases how airlines can actively contribute to noise abatement efforts while simultaneously upholding well-established networks that provide consistent air travel connectivity to passengers and sustain revenue streams.
- c. By allowing these airlines to maintain their historical schedules, which may be affected by limited airport slots at both AMS and DXB in the case of Emirates, they can effectively manage the constraints posed by historical and restricted slots at each end of the route.

iv. Capacity reduction (including 'Reduce capacity to 440k overall / 29k night flights' and 'Reduce capacity of night flights to 25k (500k overall)'):

The proposals to reduce capacity have the potential to impact Emirates' slots at AMS:

- a. The draft policy by ACNL (Airport Coordination Netherlands) lacks specific details regarding the procedure for determining the reduction in historic slots.
- b. Currently, there is no global precedent on how an airport's objective to permanently reduce capacity translates into the reduction of historic slots held by airlines. The *Worldwide Airport Slot Guidelines (WASG)* affirm that airline historic slots must be honoured (6.10.1). This principle recognises the



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airlines' commitment and investment in resources, network development, and the significant contributions they make to the local economy and travelling public.

- c. ACNL has not provided clear guidance on the procedure for proportionally reducing historic slots, resulting in ambiguity during the consultation process.
- d. Emirates encourages ACNL, the Schiphol (AMS) Airport Managing body, and other relevant authorities to adopt a hybrid approach that combines both 'priority' and 'proportional' methodologies. This approach would establish an efficient working procedure that safeguards the interests of airlines operating year-round daily services across different time bands, while ensuring the allocation of scarce airport capacity is optimised and avoids fragmentation.

C. Additional recommendations

- i. From an Air Navigation perspective, we recommend the following:
 - a. **Prioritisation of Arrival and Departure Procedure Design:** It is essential to prioritise aeronautical procedure design as part of the project. All our aircraft are equipped to fly Performance-Based Navigation (PBN) departure and arrival routings, which offer explicit and precise tracks. These procedures can be designed to ensure that aircraft accurately follow noise-avoidance tracks, carefully planned at appropriate heights around the airport. This consideration should be an integral part of the plan.
 - b. **Consultation with Operators:** We strongly advise engaging in consultation with operators of all aircraft types operating in and out of AMS. Different aircraft types, such as the B737 and A380, can yield varying results and follow different flight tracks. By involving operators in the design process, potential issues can be addressed proactively. An example from another European airport highlights the importance of such consultation, where a departure procedure unintentionally caused complaints due to coding issues. Consulting operators would have allowed for the inclusion of an additional waypoint, thus preventing resident dissatisfaction with overflights. It is crucial to learn from such instances and ensure collaboration with operators during the design phase.



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III. Conclusion

Emirates does not endorse any of the proposed combinations of noise reduction measures in their entirety. This is primarily due to concerns regarding the ambiguous potential reduction of historic slots by ACNL, the adverse operational effects of extending the night regime, and the potential drawbacks associated with the use of noise-preferential runways, such as increased aircraft taxi times, fuel consumption, CO₂ emissions, and operating costs. We also strongly recommend the prioritisation of arrival and departure procedure design (Performance Based Navigation) at AMS as well as consultation with operators of all aircraft types in doing so.

In terms of slot allocation, our recommendation strongly favours adopting a hybrid approach that combines both the 'priority' and 'proportional' methodologies. This approach aims to effectively address the slots allocation concerns and ensure a balanced solution that considers the interests of all stakeholders involved.

Date: 15 June 2023

Place: Dubai, United Arab Emirates