T&E response to the Call for Evidence for the Evaluation of the Balanced Approach Regulation

February 2026

T&E welcomes the opportunity to give feedback on the Balanced Approach Regulation, stressing the importance of meeting its objectives: to facilitate the achievement of noise abatement objectives, including health aspects, at the level of individual airports, while respecting the rules laid down in the Environmental Noise Directive and national legislation; and to enable the use of operating restrictions in accordance with the Balanced Approach so as to achieve the sustainable development of the airport and air traffic management network capacity.

This can be better achieved through full consideration and prioritisation of operating restrictions; optimising the societal value of the airport network within limits compatible with noise protection; and respecting national laws and democratic processes.

1. Citizens' health: Operating restrictions offer the most immediate, effective noise protection

As acknowledged in the call for evidence, despite advancements in aircraft noise reduction, the increasing volume of air traffic means that many EU citizens continue to be exposed to high noise levels around airports. The European Aviation Environmental Report 2025 states that while the total European airport noise exposure is still slightly below 2019 levels, trends at the individual airport level vary, with an increase in noise exposure at about one third of these major airports between 2019 and 2023.

According to T&E's Down to Earth study, passenger air traffic at European airports will more than double in 2050 compared to 2019, if Airbus and Boeing growth projections materialise. At the pace of passenger growth desired by industry, large airport capacity increases would likely be required. Major expansions are underway at Frankfurt airport; announced at Paris, Dublin, Brussels and Lisbon airports; and recently approved at multiple Spanish and UK airports, notably in Madrid and London. However, large capacity increases would not be matched by improvements to noise at source.[1] Thus **operating restrictions must be fully considered and prioritised** amongst measures taken, where they offer the most immediate, effective protection of citizens' rights, health and well-being.

[1] Especially because the increase in the stringency of the noise standard agreed at ICAO CAEP 13 is a cumulative margin of just 6 EPNdB, or an average of 2 EPNdB at any one of the three measurement points.

This has been the case in the introduction of operating restrictions at Amsterdam Schiphol Airport. Cited in the European Commission's decision in March 2025, the Netherlands considered that any new land-use planning measures (e.g. management of housing close to the airport) and noise abatement operational procedures (e.g. choices of landing and take-off routes) were ineffective to achieve the noise objective by the envisaged deadline of November 2025. Quieter aircraft and fleet renewal were to be subject to a covenant between the Netherlands and KLM Royal Dutch Airlines, with Dutch authorities considering that improvements in the environmental performance of aircraft fit within a long-term perspective. In order to meet the short-term objective, the Netherlands prioritised operational restrictions including limiting total annual aircraft movements to 478.000, and limiting aircraft movements to 27.000 annually during the night period. Limiting noise from night flights with particularly harmful health effects is a targeted, sensible measure which has been implemented already by numerous airports across Europe and should be systematically considered and privileged.

Operating restrictions are the main effective and swift tool available for noise mitigation needed to fulfill national and airport-level targets. This accords with the experience of environmental organisations representing the interests of airport communities such as the Aviation Environment Federation in the United Kingdom, which are closely engaged with the International Civil Aviation Organisation (ICAO) Balanced Approach procedures. Operational procedure choices mainly affect the distribution of noise, without necessarily reducing the total noise exposure. Land-use planning is an instrument with long-term timelines, often conflicting with pressures on local authorities to provide more housing. Reduction at source, relating to fleet renewal, also follows longer timelines as it can be dependent on updates to ICAO standards occurring in phases lasting beyond five years.[2]

In experience thus far, **the Balanced Approach procedure risks slowing down effective responses to noise problems**, allowing excessive noise exposure of local populations to continue over years, while delaying immediate responses to protect the health of people such as operating restrictions to reduce noise at night. This has undermined the effectiveness of the achievement of the Regulation's objectives, in the implementation and functioning to date.

[2] For example, ICAO Chapter 14 noise standard was agreed in 2013, but it took until 2025 for ICAO to agree an increase in stringency, and this will only take effect in 2029.

2. Costs and benefits : Optimising the societal value of the airport network within limits compatible with noise protection

As stated in the call for evidence, effective noise management is crucial to safeguard the well-being of people residing near airports. The Regulation stresses that "the importance of health aspects needs to be recognised in relation to noise problems, and it is therefore important that those aspects be taken into consideration in a consistent manner… [and] be assessed in accordance with Union legislation on the evaluation of noise effects." In practice, the focus on cost-effectiveness analysis gives little attention to the costs to society of health problems as well as property devaluation caused by airport noise, and to the societal benefits of operating restrictions including gains related to the economic productivity of airport communities. Citizens' health must be protected and prioritised, which requires that there be **better accounting for the societal and sometimes hidden economic costs of airport noise**.

A study by France's Finance Ministry has shown that air traffic costs society - i.e., the negative externalities associated with the journey (noise pollution or greenhouse gas emissions, for example) - more than the price paid by users. Thus, "when a flight creates a nuisance costing society €1 , the user only pays 34 cents," the study states. Air traffic noise in particular is responsible for cardiovascular disease and sleep disturbances. It therefore represents an estimated social cost of €5.6 billion at the national level, according to a study by Ademe, France's Ecological Transition Agency. And yet in the experience with the Balanced Approach for Paris Charles de Gaulle airport, operating restrictions were excluded from the measures considered, despite the public consultation noting that "traffic projections for 2030, incorporating the measures set out in the first three pillars of the Regulation without any new operating restrictions, show that improving the acoustic performance of fleets and implementing optimised operational measures will not be enough to achieve noise reduction targets."

The call for evidence states that a noise strategy must carefully balance the interests of citizens living close to airports with the interests of those who wish to use air transport or depend on it. According to the European Commission's decision on the introduction of operating restrictions at Amsterdam Schiphol Airport, the Netherlands had carried out a study in the initial stages of the Balanced Approach process, which concluded that a reduction to 400.000-440.000 flight movements per year would not harm Schiphol Airport's and the Netherlands' connectivity. A core network of strategic destinations would remain intact allowing Schiphol Airport to continue operating as a hub.

And a separate academic study in the Netherlands, commissioned by Natuur & Milieu in 2024, found that the Dutch government's network quality framework which measures

the value of individual destinations, is inadequate from an environmental and societal perspective. When correcting for climate costs and comparing economic value across transport modes, it finds that about a third of all flights could be removed without negative economic consequences. These findings show that **prioritising quality over quantity, by optimising the economic and societal value of the network rather than maximising the volume of flights, is compatible with meaningful noise protection**.

Such substantive arguments should be better reflected in a more accurate and complete consideration of the costs and benefits of operating restrictions. In this light the efficiency of the assessment of costs and benefits has not been comprehensive, and coherence with EU sustainability and health goals has not been optimal, in the implementation and functioning to date.

3. Respecting national laws and democratic processes

The call for evidence explains that while the Regulation entered into force in 2016, the evaluation is coming only now after the first substantial experience with actual implementation in France and the Netherlands, and more Member States likely to follow. The initial implementation assessment study published by the European Commission in 2022 states that Competent Authorities emphasised that any potential amendments to the legislation should **not hinder or undermine the location-specific, longstanding and pre-existing approaches to noise management**, which are well understood and considered effective by many stakeholder groups.

In the Netherlands, according to the experience of environmental organisations such as Natuur & Milieu, the Balanced Approach procedure tended to support the status quo and incumbent industry interests, rather than evolving environmental and societal priorities, and to slow down the implementation of effective short-term solutions. The process was perceived as untransparent, with a lack of information to the Dutch Parliament, which undermined its role of consent on decisions made, in a context of significant lobbying by European and United States airlines.[3] Indeed, most of the pressure to avoid or relax operating restrictions comes from airlines based outside of Europe, but it is European citizens who suffer the most from airport noise.

Portugal is currently initiating the Balanced Approach procedure for Lisbon Airport, following last year's Resolution of the Council of Ministers, which mandated a hard curfew on night flights and additional operating restrictions. This Resolution was based on the conclusions of a working group commissioned by the Ministry of Infrastructures

[3] For more details on the experience with the Balanced Approach Regulation in the introduction of operating restrictions at Amsterdam Schiphol Airport, see the response to the call for evidence by Natuur & Milieu.

to assess the costs of night flight noise for health and of greenhouse gas emissions. The results indicated that the societal and economic costs of night flights outweighed their economic benefits. Due to the initiation of the Balanced Approach procedure, environmental organisations such as ZERO expect a delay in the implementation of the hard curfew and other operating restrictions in Portugal for several years.

In Belgium, the procedure has been initiated following a court decision requiring the application of the Balanced Approach after legal challenges to the environmental permit for Brussels Airport granted by the regional government of Flanders. In 2024, the Belgian Superior Health Council's scientific advisory report arrived at the primary recommendation of a ban on night flights; and a further conclusion that an expansion of the number of flights was not acceptable, given the high health burden on neighbouring residents in terms of noise exposure and air pollution. According to the experience of environmental organisations such as Bond Beter Leefmilieu representing voices of airport communities, the procedure creates specific risks in the case of Belgium. Even after completion, the permit might still not be granted or could be repealed by the court if broader environmental criteria including air pollution, climate impacts and other hazards, subject to parallel national legal proceedings, are not sufficiently addressed. In the context, the procedure risks prolonging uncertainty for authorities, communities and airport operators alike rather than contributing to legal certainty.

Respect for democratic processes and compliance with national legislation should therefore be the starting point for any Balanced Approach procedures, rather than being undermined. In this light the effectiveness of the achievement of the Regulation's objectives, as well as the EU added value, have not been optimal in the implementation and functioning to date.

Conclusion

Experiences with the Balanced Approach Regulation to date in France and in the Netherlands have shown that its implementation and functioning have not been optimal, impairing the effective achievement of its objectives. In view of the new procedures being initiated in Belgium and Portugal, fully considering and prioritising operating restrictions; optimising the societal value of the airport network within limits compatible with noise protection; and respecting national laws and democratic processes, can better facilitate the realisation of noise abatement and health goals, and enable the use of operating restrictions as a key tool to achieve sustainable airport network capacity.

Further information:

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