



IATA Position on Noise-Related Operating Restrictions

Introduction

The ICAO Balanced Approach, which was unanimously endorsed by ICAO's Assembly in 2001, provides a transparent process for managing demonstrated noise problems on an airport-by-airport basis. It recognizes and is based on the principle that solutions need to be tailored to the specific characteristics of the airport concerned.¹

Operating restrictions are one of the four principal elements of the ICAO Balanced Approach, along with reduction of noise at source, land-use planning and management, and noise abatement operational procedures. An operating restriction is any noise-related action that limits or reduces an aircraft's access to an airport.²

Considering the impact operating restrictions may have on airlines, passengers and local economies, they should not be introduced as a first resort but only after a full assessment of all available measures to address a demonstrated noise problem at an airport.

IATA is committed to working with competent authorities, airports and local communities to develop tailored solutions to address demonstrated noise problems with minimal negative impact on airlines, passengers and local economies.

Night time operating restrictions

Night time operating restrictions have a negative impact on airlines, passengers and local economies.

Night flights are in particular critical for cargo and express operators. Night curfews have a great impact on their activities and undermine the ability of the sector to support many industries' global supply chains. In particular, the delivery of time-sensitive products such as pharmaceutical freight and perishable products would be affected. Next-day delivery services also depend on night flights.

Night curfews also have negative consequences for passenger airlines and travellers. Night curfews limit the ability of airlines to schedule flights in an optimal manner and to facilitate connectivity for travellers. They worsen existing capacity constraints and may result in additional congestion particularly in the evening and early morning. Also, where night curfews do not provide for sufficient flexibility to allow delayed traffic to operate, airlines may have to divert flights to other airports or delay them to the following day, causing serious inconvenience to travellers both on the diverted or delayed flights and on other flights consecutively affected by the disruption to the airlines' operations.

The introduction of night time operating restrictions at an airport can also have a negative impact on the noise environment at other airports. Firstly, air traffic might shift to other airports where no restrictions are in place; such a shift may increase noise levels at other airports and

¹ ICAO Assembly Resolution A37-18, Appendices C and E.

² *Guidance on the Balanced Approach to Aircraft Noise Management*, ICAO Doc 9829, p. vii.



result in additional gaseous and noise emissions from road transport as the journeys between the travellers' destinations and the airport may be greater. Secondly, the scheduling constraints imposed by night curfews in one region may result in a greater number of night time departures or arrivals in other regions.

Aircraft-specific operating restrictions

Aircraft-specific operating restrictions apply to aircraft based on individual noise performance.

The introduction of aircraft-specific operating restrictions can have an important impact on airlines as they may prevent them from operating to an airport using their most appropriate aircraft for that specific market. As a result, an operating restriction may result in a suboptimal use of airport capacity, higher operating costs and potentially also additional emissions if the replacement aircraft is less fuel efficient than a more appropriate aircraft for the market and associated flight distance.

Where operating restrictions aim at the withdrawal or phase-out of aircraft which are certified in accordance with ICAO's noise standards, they undermine the role of international standards in securing a high degree of uniformity and stability in regulations. ICAO's standards were indeed not intended to introduce operating restrictions, but have instead been an important means for securing technological improvements and creating the necessary regulatory predictability for airlines. Considering the international nature of air transport and the long lifespan of aircraft, airlines must have the assurance that aircraft certified in accordance with all applicable standards can be operated worldwide during their entire lifespan and without undue restrictions that hamper international air transport.

ICAO's Committee on Aviation Environmental Protection (CAEP) recognized this when it recommended that States be urged not to introduce operating restrictions on aircraft that comply with the noise certification Standard of Annex 16 Volume I, Chapter 4 and/or 14.³

Consultation and notification of stakeholders

The ICAO Balanced Approach requires States to institute a transparent process when considering noise-related measures. One of the building blocks of this process is the provision for consultation with stakeholders at different stages from assessment through implementation.⁴ Consultation with stakeholders is essential as it will help in identifying alternative solutions, discussing any technical, operational or safety concerns, and facilitating the dialogue between all parties. The consultation process may notably lead to the development of a voluntary agreement to resolve noise management issues, ensuring that the solution adopted is supported by all stakeholders.

Airline operations are planned many months in advance, *inter alia* to allow airlines to apply for airport slots, where necessary, and ensure that operations are coordinated optimally across their entire network. If an airline has to make significant modifications to its schedules after they have been planned, the consequences may be very detrimental: passengers may have

³ CAEP/9-DP/6, Paragraph 3.9.32.1.

⁴ *Guidance on the Balanced Approach to Aircraft Noise Management*, ICAO Doc 9829, p. 1-2-2.



to be rebooked on different flights or their reservations cancelled, connections with other flights may no longer be possible, alternative slots may not be available, etc. Furthermore, as aircraft are usually allocated to different routes, a single change on one route may have repercussions over the rest of an airline's network. Consequently, it is of utmost importance that airlines are informed of all applicable operating restrictions in due time. At slot coordinated airports, the notification should take place before the deadline to apply for slots each season. At all other airports a notification period of at least nine months is recommended.

The responsibility of Governments

States have an important role to play in the management of noise at airports. They are responsible for the proper implementation of the ICAO Balanced Approach within their jurisdiction and ensure the principles summarised in the Annex are followed. They should also facilitate the application of measures other than operating restrictions, including noise reduction at source, operational procedures and land-use planning and management.

As a result of technological improvements, aircraft produced today are 75% quieter than they were 50 years ago.⁵ Since the first ICAO international standards for aircraft noise were adopted in 1971, certification standards have periodically been made more stringent. At its last meeting in February 2013, the ICAO Committee on Aviation Environmental Protection (CAEP) reviewed technological feasibility, environmental benefits and economic factors and reached a consensus to move forward with a new standard that will result in a reduction of 7 Effective Perceived Noise Decibels (EPNdB) compared to the current Chapter 4 Standard.

As land-use planning has a direct effect on the number of people affected by aircraft noise, proper land-use planning policies are critical to preserve the noise reductions achieved through the introduction of quieter aircraft. IATA therefore urges competent authorities to take measures to prevent further urban encroachment from happening. In addition, land-use management measures such as noise insulation programmes can help reduce the impact of aircraft noise on communities around the airport.

Noise abatement operational procedures are another means to mitigate aircraft noise. For example, noise preferential routes can be used to avoid noise-sensitive areas on departure and arrival. The implementation of continuous descent approaches (CDA), which allows aircraft to descend according to a continuous vertical profile, can also contribute to addressing the impact of noise, in addition to reducing CO₂ emissions. Governments should work with the industry to identify best practices and implement noise abatement operational procedures when appropriate. The participation and support of air traffic management organizations in this process is essential.

It is also very important that States promote research into technologies to reduce noise at source and in flight and research aimed at improving the understanding of the impacts of noise. To support both fields of research and improve our ability to evaluate and compare different measures, advanced simulation tools need to be developed and made available.

⁵ ICAO, *Environmental Report 2010*, p. 22.



Annex: Essential principles for the introduction of operating restrictions

Operating restrictions should only be introduced based on the ICAO Balanced Approach and relevant ICAO guidance⁶.

When the introduction of operating restrictions is considered, IATA strongly urges competent authorities to follow the principles endorsed by ICAO in Assembly Resolution A37-18 including, in particular, the following rules:

- Operating restrictions should only be introduced at airports with a demonstrated noise problem.
- Operating restrictions should not be introduced as a first resort but only after a full assessment of available measures and of the benefits to be gained from other elements of the balanced approach.
- Operating restrictions should only be introduced if they address the noise problem in the most cost-effective manner.
- All relevant stakeholders, including airlines, should be consulted before a decision is made to introduce operating restrictions.
- Operating restrictions should be based on the certified noise levels of aircraft and not on other criteria such as the type of operations.
- Airlines must be given a sufficient period of advance notice and operating restrictions should be introduced gradually over time where possible.
- Operating restrictions should not aim at the withdrawal of aircraft that comply with the noise standards in Volume I, Chapters 4 and/or 14 of Annex 16.

IATA also urges competent authorities to follow the recommendation made by ICAO's Committee for Aviation Environmental Protection (CAEP) at its ninth meeting and refrain from introducing operating restrictions on aircraft that comply with the noise standards in Volume I, Chapter 4 and/or 14 of Annex 16.⁷

⁶ *Guidance on the Balanced Approach to Aircraft Noise Management*, ICAO Doc 9829.

⁷ CAEP/9-DP/6, Paragraph 3.9.32.1.