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BSP Position Paper: Evaluation of the Balanced Approach Regulation (EU) No 598/2014

Business & Science Poland

This position paper is submitted on behalf of Business & Science Poland (BSP) in response to the European Commission's public consultation on the evaluation of Regulation (EU) No 598/2014, commonly referred to as the Balanced Approach Regulation. It presents the perspective of the aviation sector, particularly airport operators, on the implementation of the Regulation and identifies key challenges and recommendations concerning aircraft noise management, land-use planning and the introduction of operating restrictions.

Background

The Balanced Approach Regulation establishes rules and procedures with regard to local noise management when a "noise problem" has been identified under the Environmental Noise Directive. It aims to establish an objective and transparent process for the introduction of noise-related operating restrictions at EU airports. It reflects the principles of the International Civil Aviation Organization (ICAO) rules, which were established to harmonise the way States address noise problems and ensure the noise assessment methods are based on objective and quantifiable criteria. Business & Science Poland considers the underlying principles of the Balanced Approach Regulation to be a positive framework for addressing aircraft noise. The Regulation establishes important safeguards by requiring that measures should not be more restrictive than necessary to achieve the established objectives, that comprehensive cost-benefit assessments should be carried out both with and without operating restrictions, and that all relevant stakeholders should be consulted. Yet, the implementation of the Regulation remains a complex process, requiring the assessment of a wide range of factors that may be difficult to determine accurately. Particular challenges arise in relation to land-use planning and management around airports, where existing urban development and planned investments may limit the effectiveness of available measures.

Key BSP recommendations

(1) Ensure the proportionality of noise-related measures and comprehensive cost-benefit assessments.
(2) Strengthen land-use planning and management under Pillar II of the Balanced Approach.
(3) Ensure consistent implementation of the Balanced Approach across Member States.

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(4) Put greater emphasis on the economic impact of restrictions and technological advancements

Detailed recommendations

(1) Ensure the proportionality of noise-related measures and comprehensive cost-benefit assessments.

The underlying principles of the Balanced Approach Regulation provide an appropriate framework for addressing aircraft noise. In particular, the requirement that adopted measures should not be more restrictive than necessary to achieve previously established objectives constitutes an important safeguard. Equally important is the obligation to conduct a comprehensive assessment of costs and benefits, considering scenarios both with and without operating restrictions, and to ensure broad consultation with all relevant stakeholders. Implementing the Regulation remains an intricate process that requires the assessment of all noise-related impacts, as well as, numerous other parameters that may be difficult to quantify accurately.

(2) Strengthen land-use planning and management under Pillar II of the Balanced Approach.

From the perspective of airport operators, significant challenges may arise in implementing Pillar II of the Balanced Approach, concerning land-use planning and management. Measures in this area may conflict with planned investments or prove difficult to implement where urbanisation has already progressed to an extent that cannot be stopped or reversed. The absence of effective spatial planning policies contributes to the continued development of residential areas in close proximity to airports and aircraft flight paths. As a result, the number of residents exposed to aircraft noise increases, generating pressure to introduce operating restrictions rather than preventing potential conflicts at the spatial planning stage. Besides, inadequate land-use planning may undermine the effectiveness of measures aimed at reducing aircraft noise. Even where technical and operational measures result in an objective reduction in noise levels and a decrease in the geographical extent of noise contours, the total number of people exposed to aircraft noise may nevertheless increase. This apparent paradox arises when the pace of residential development in the vicinity of airports exceeds the reduction in noise exposure achieved through implemented mitigation measures. There is a need for coherent land-use planning policies that limit residential development in areas exposed to aircraft noise.

(3) Ensure consistent implementation of the Balanced Approach across Member States.

The principles outlined in the Athens Declaration emphasise the importance of EU and national authorities strictly following the sequence of measures established under the Balanced Approach and ensuring the consistent application of its principles across all airports. Hence, the evaluation should promote a more consistent methodology for

assessing noise problems and the proportionality of proposed measures. Operating restrictions must remain a genuine measure of last resort, considered only after the other elements of the Balanced Approach have been properly assessed. However, greater methodological consistency must not lead to centrally determined operating limits. In accordance with the principle of subsidiarity, the specific circumstances of each airport should remain central to decision-making. The EU framework should ensure consistent procedures, transparent assessments and proper implementation of the ICAO Balanced Approach, rather than provide a basis for broader restrictions or uniform operating limits at EU level.

(4) Put greater emphasis on the economic impact of restrictions and technological advancements.

Restrictive measures can affect not only individual flights or airports, but also the EU's overall connectivity and the competitiveness of European aviation. Intercontinental services require sufficient scheduling flexibility to accommodate long rotations and connecting waves. Restrictions that prevent airlines from operating at viable times may therefore lead to hub switching, with traffic and connectivity moving from EU airports to more flexible non-EU hubs. Noise assessments should be regularly reviewed to reflect technological progress and the actual noise characteristics of modern fleets. The regulatory framework should provide airlines with clear incentives to invest in quieter and more efficient aircraft, rather than relying solely on increasing restrictive measures. Otherwise, industry may bear the cost of technological renewal without receiving corresponding operational benefits.

Conclusion

BSP supports the objectives of the Balanced Approach Regulation. Notably, its emphasis on proportionality, comprehensive cost-benefit assessments and stakeholder consultation. It is important to note, that its effective implementation requires greater attention to land-use planning and management around airports. BSP recommends strengthening spatial planning policies to limit residential development in areas exposed to aircraft noise and prevent urbanisation from undermining noise mitigation efforts. EU and national authorities should ensure the consistent application of the Balanced Approach, with operating restrictions considered only after a comprehensive assessment of alternative measures. The evaluation should promote greater methodological consistency in assessing noise problems and the proportionality of proposed measures, while respecting the specific circumstances of individual airports and the principle of subsidiarity. The EU framework should remain aligned with ICAO principles to avoid unnecessary or disproportionate operating restrictions and associated economic costs. Finally, greater consideration should be given to the wider economic implications of operating restrictions, especially their potential impact on connectivity and the competitiveness of European aviation. The regulatory framework should also recognise technological advancements and provide appropriate incentives for airlines to invest in quieter and more efficient aircraft. Effective noise management

should rely on a balanced combination of measures rather than increasing the number of restrictive operating limitations alone.

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About BSP

Business & Science Poland (BSP) combines the experience of leading Polish enterprises with the EU agenda. We represent the knowledge and interests of Polish companies employing over 180,000 people in Poland, the EU, and globally. Our goal is to support the EU Single Market in line with the need for its responsible and effective transformation. This opinion presents the position of BSP members representing the digital, financial, air transport, fertiliser, chemical, mining, refining, fuel and energy sectors.

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