

FEEDBACK PAPER

Evaluation of the Balanced Approach Regulation on noise at EU airports

CLECAT, the European association for forwarding, transport, logistics and customs services, welcomes the opportunity to provide feedback and comments to the European Commission's [targeted consultation](#) as part of its evaluation of Regulation (EU) No 598/2014 on the establishment of rules and procedures with regard to the introduction of noise-related operating restrictions at Union airports, in accordance with the so-called "balanced approach" to aircraft noise management.

CLECAT, the European association for forwarding, transport, logistics and customs services, is the leading voice on freight forwarding and logistics at the EU level in Brussels. We represent and are supported by 26 member organisations, working to promote a sound approach to transport and logistics across Europe, in support of the competitiveness of our industry. The members of CLECAT are responsible for handling 95% of all air cargo and are, as such, the vital link between exporters/importers of goods and transport operators, such as air carriers.

The Strategic Importance of Air Freight and the Relevance of the Regulation

Air freight is a strategic pillar of the European economy. It enables the rapid movement of high-value and time-sensitive goods, including pharmaceuticals, medical supplies, advanced manufacturing components, express consignments and e-commerce shipments. It supports supply-chain resilience, industrial competitiveness and Europe's global connectivity.

Unlike passenger aviation, air cargo operations depend heavily on late evening, night-time and early-morning slots in order to meet strict delivery timelines and maintain hub connectivity. The operational model of freight is therefore structurally different from passenger traffic. Measures that apply uniformly across aviation segments may generate disproportionate impacts on air cargo even where noise performance is comparable. Restrictive measures may lead to traffic diversion to non-Union airports, weakening Europe's position within global logistics networks and reducing supply-chain resilience.

Therefore, CLECAT strongly stresses the importance of protecting access to late evening, night-time and early-morning slots for air cargo operations. Restrictions targeting only these periods would have disproportionate operational and economic impacts and could adversely affect European connectivity, supply-chain resilience and overall competitiveness.

For freight forwarders, the Balanced Approach Regulation is therefore a framework that directly affects connectivity, logistics reliability, legal certainty and the competitiveness of European supply chains. Its effectiveness depends on whether operating restrictions are introduced only as a genuine last resort and on the basis of robust, transparent and evidence-based assessments.

Experience from Amsterdam Schiphol Airport

The developments at Amsterdam Schiphol Airport represented one of the most significant practical tests of the Regulation since its entry into force. In 2022, the Dutch authorities announced their intention to reduce the number of aircraft movements with the objective of lowering noise exposure for residents living near the airport. From the perspective of economic operators, including Air Cargo Netherlands (ACN), a CLECAT member, the proposed capacity reduction risked being treated as a policy objective rather than as a measure of last resort, as required under Article 5(3)(d) of the Regulation.

Throughout the long legal process, concern was expressed on the fact that the noise-reduction potential of ongoing fleet renewal had not been fully assessed and that operational noise-mitigation measures, including improved flight procedures and technological advancements, had not been sufficiently explored. In addition, the broader socio-economic implications for air cargo connectivity, supply-chain reliability and the competitiveness of European economic operators were not comprehensively analysed.

The European Commission's [decision](#) of March 2025 confirmed several of these concerns. The Commission concluded that the Netherlands had only partially taken into account the noise-reduction benefits of fleet modernisation and had not adequately examined alternative operational measures. It also identified inconsistencies in the scope of the proposed restrictions, including differentiated treatment of aviation segments that would have disproportionately affected the cargo sector.

The Schiphol case demonstrates the importance of strict adherence to both the procedural and substantive requirements of the Balanced Approach Regulation. Operational restrictions should not become the central pillar of a noise-management strategy unless it is clearly demonstrated, through objective analysis, that other technically and economically viable measures are insufficient. For CLECAT this underlined that the Regulation must function as a substantive safeguard ensuring proportionality, legal certainty and the proper consideration of socio-economic impacts.

As demonstrated by the experience at Amsterdam Schiphol Airport, operational restrictions should not form the central pillar of a noise-management strategy unless it is clearly proven that other measures are insufficient. Otherwise, there is a concrete risk of undermining a key principle of the Regulation and distorting day-to-day operations of economic operators.

Experience from Paris Charles de Gaulle Airport

By contrast, the balanced approach impact assessment conducted at Paris Charles de Gaulle Airport provides a more positive example of how the Regulation can be implemented in line with its objectives.

The French authorities examined a wide range of potential measures, including fleet modernisation, operational noise-mitigation initiatives and procedural adjustments, before contemplating operating restrictions. The assessment process extended over more than two years and combined detailed technical analysis with structured and meaningful stakeholder consultation. Stakeholders, including industry representatives and local communities, were engaged at an early stage, allowing for a more transparent and evidence-based decision-making process.

However, land-use planning remains fragmented, and noise insulation programmes are chronically under-funded and slow to expand. This has contributed to continued residential encroachment and

delays in noise mitigation measures, thereby increasing the number of people exposed to noise and fuelling political pressure for operational restrictions rather than addressing underlying land-use issues. The effectiveness of the Regulation depends on proper zoning and adequate insulation, yet these measures remain uneven and under-resourced across France.

Therefore, this approach does not entirely reflect the core principles of the Regulation, namely that operating restrictions should only be considered after other measures have been thoroughly evaluated and demonstrated to be insufficient. On a positive note, the assessment recognised the specific operational characteristics of air cargo and avoided premature or disproportionate limitations on freight activity.

Across Europe, many national and local authorities still struggle to meet key balanced approach requirements on land-use compatibility and building insulation. In several regions, compatible zoning is not enforced, insulation standards for new or existing buildings are weak or absent, and new residential development continues to creep toward airports.

Forward-Looking Considerations

In light of the practical experience gained since the entry into force of Regulation (EU) No 598/2014, CLECAT considers that the ongoing evaluation offers an opportunity to reinforce the effectiveness, proportionality and consistency of the balanced approach and providing guidance to Member States and local authorities, while safeguarding connectivity and the competitiveness of the European aviation and logistics sectors.

In particular, it is essential to reaffirm that operating restrictions must remain measures of last resort, applied strictly in compliance with Articles 5(3) and 5(6) of the Regulation. Limitations for fleet renewal for air cargo should be recognised under Pillar 1 of the Regulation, reducing aircraft noise at source, with transition periods aligned with fleet availability and industrial capacity of the sector. National competent authorities should systematically prioritise operational noise-mitigation measures, including flight path optimisation, improved procedures and the deployment of performance-based navigation technologies, before considering flight movement restrictions. At the same time, better land use planning and management should be pursued.

The balanced approach impact assessments should also comprehensively account for wider socio-economic implications, including effects on connectivity, air cargo operations, supply-chain resilience and EU competitiveness. In this regard, the Commission could consider providing additional guidance to support harmonised and consistent application across Member States. Transparent decision-making processes, early stakeholder engagement and adequate implementation timelines are equally important to safeguard legal certainty and avoid disproportionate disruption to economic operators.

Conclusion

CLECAT supports the objectives of Regulation (EU) No 598/2014 and recognises the balanced approach as the appropriate framework for aircraft noise management within the European Union. Recent implementation experiences demonstrate that the Regulation remains relevant and necessary. However, its effectiveness depends fundamentally on consistent and rigorous application across Member States.

The experiences at Amsterdam Schiphol Airport and Paris Charles de Gaulle Airport illustrate shortcomings but also some positive aspects in the implementation of the current framework. Where

operating restrictions risk being treated as policy objectives in themselves, the principles of proportionality, transparency and last resort may be undermined. Where authorities conduct comprehensive assessments and engage stakeholders meaningfully, yet they fail to fully examine alternative measures across all pillars.

The ongoing evaluation therefore represents an important opportunity to reinforce legal certainty, to provide guidance, coherence and predictability in the application of the balanced approach, ensuring that environmental objectives are achieved while preserving Europe's connectivity, supply-chain resilience and global competitiveness.

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