

Comments from the Aviation Environment Federation on the European Commission's Evaluation of the Environmental Noise Directive



29th March 2016

AEF submitted a response to the European Commission's consultation on its evaluation of the Environmental Noise Directive (END), which closed on the 28th March¹. As the public consultation was a multiple choice questionnaire, AEF also submitted a letter to the European Commission further outlining our views. This document summarises AEF's comments on the effectiveness of the END and how it could be improved.

AEF and the END

The Aviation Environment Federation (AEF) is the only UK-wide NGO concerned exclusively with the environmental impacts of aviation. AEF represents individuals, community groups, parish and local councils from across the UK in discussions with national and international policy makers and the industry. We participated directly in the European Commission working groups that created the END and have monitored how the Directive has been implemented with respect to airports in the UK, and the effectiveness of the subsequent Noise Action Plans (NAPs).

Has the END been effective?

AEF believes that the END has helped to establish environmental noise in Member States as a major public health issue that needs to be tackled. The communities and local authorities that we represent regard aircraft noise as a critical issue that needs effective policy action, especially given the Commission's own analysis that the population exposed to aircraft noise levels above 55 dBA Lden is forecast to increase 15% by 2035 compared to 2012 levels when the number already stood at around 5 million EU citizens². The EU has taken a leading role in calling for action on environmental noise. As the EU's flagship policy to tackle the noise problem, however, we consider the END in its current form to have significant limitations.

The mapping requirement in the END originally, we believe, played a useful role in improving the data availability in relation to noise exposure around the UK's airports. The UK Government's Department for Environment, Food and Rural Affairs (Defra) published online noise maps from 2006 for all airports covered by the Directive (including large airports and those close to conurbations). These maps used noise metrics that communities perceived as providing a better representation of the noise problem than the UK's official daytime noise metric, 57 dBA Leq. For some of these airports, noise contours were made publicly available for the first time.

However, the 2011 data was by contrast not presented in a central publicly available location, with Defra instead providing links to the airports' NAPs in a document published in 2015, titled '*Strategic noise mapping: Explaining which noise sources were included in 2012 noise maps*'³. It was then up to the airport how it presented the information required under

¹ Details here: http://ec.europa.eu/environment/consultations/noise_2015_en.htm

² <http://ec.europa.eu/transport/modes/air/aviation-strategy/documents/european-aviation-environmental-report-2016-72dpi.pdf>

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/453620/noise-mapping-source-guidance.pdf

the END. The lack of consistency and central location to view data has made it challenging to look at trends at airports across the UK.

Being able to assess trends in the noise environment is a useful tool for examining the effectiveness of NAPs. In the UK, the airports are the competent authority for producing NAPs to tackle any noise they themselves deem to be excessive. NAPs require some level of consultation and Defra has responsibility for assessing them but it is currently unclear how the judgement is made of what constitutes excessive noise levels and how appropriate action is judged.

It is AEF's view that this lack of clarity is the central challenge to the effectiveness of the END and the reason why AEF believes the END is failing in its overarching aim to protect EU citizens from the harmful effects of noise. Without meaningful targets or limits to reduce the health impacts of noise the Directive succeeds only in harmonising a process without requiring common and equivalent action for all airports. Since the END came into force, the AEF has argued consistently that few airports in competitive situations would, voluntarily, impose effective measures that could limit capacity. We believe that NAPs could be better assessed if they delivered improvements towards a clearer definition of acceptable noise levels, as highlighted below.

Are any changes needed to the END?

AEF strongly believes that the Directive should explicitly outline noise levels to be attained in order to reduce the health burden from environmental noise. We note that different noise sources have different dose-response relationships in terms of contributing to sleep disturbance, annoyance, and cardiovascular illnesses and understand that further information on these relationships will be available as an Annex to the END following the WHO's updated Community Noise Guidance this year. Limit values should, we believe, be in line with WHO recommendations and set out in the END. NAPs should then be assessed in terms of how effectively they contribute to reducing noise towards health-based levels. The mapping requirement of END should, we argue, extend to assessing the burden of disease in conurbations and around airports in the UK from environmental noise. A monetised estimate of the burden of disease could then be produced based on the methodology developed by WHO Europe and outlined by Defra IGCB(N)⁴.

We believe the END should be revised to stipulate that the competent authority should be independent of the airport operator.

Finally, we believe that the END's objective "*to preserve environmental noise quality where it is good*" is not currently being effectively delivered. The protection of quiet areas in rural and urban locations is an important, health beneficial, component of the END. At the moment, the requirement for NAPs to identify quiet areas only extends to urban locations. The Commission was mandated to submit a report to the Parliament by 2009 about implementation of the Directive including proposing strategies for the protection of quiet areas in open country but no comment was provided in the 2009 report. The protection of rural quiet areas should become a stronger priority in the END and in NAPs.

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⁴https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380852/environmental-noise-valuing-imapcts-PB14227.pdf