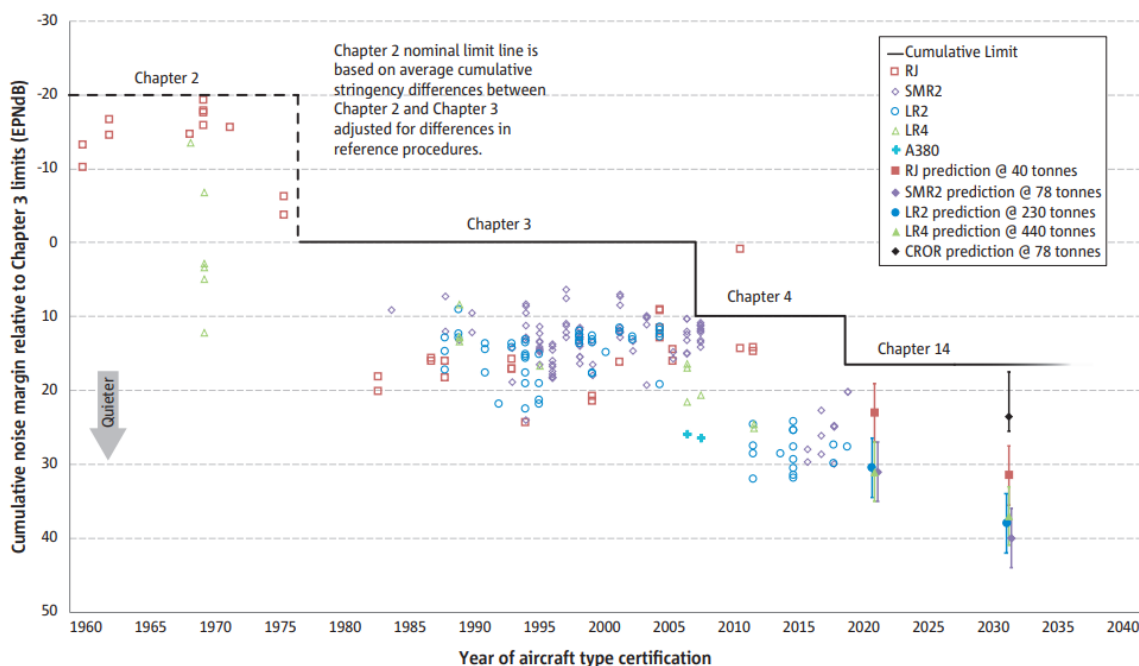


Public consultation on the revised Climate, Energy and Environmental Aid Guidelines (CEEAG)

We would like to make the following comments:

1. Noise standards setting by ICAO is guided by the so-called “backstop” principle: standards are aimed to prevent backsliding. ICAO’s principle of setting the noise standards for future aircraft is that they have to be no noisier than today’s aircraft. The consequence is that today’s aircraft already meet future standards. This is well illustrated by figure 2.2 from the European Aviation Environmental Report¹ from which it is clear that most aircraft certified in times where CH3 was applicable in fact already met Ch4 standards. And those certified in CH4 era already met the standard for the next generation (“Chapter 14”). So, the criterion of “meeting the next standard” will normally be met, and using this criterion for aircraft noise will lead to accepting state aid without any real benefit from an aircraft noise perspective.

Figure 2.2 Improvement in aircraft noise performance has occurred over time



Aircraft categories as defined by ICAO/CAEP independent experts (IE)

	Description	MTOW (tonnes)
RJ	Regional Jet	30 - 50
SMR2	Short/Medium Range 2-engine	58 - 98
CROR	Counter-Rotating Open Rotor	58 - 91
LR2	Long Range 2-engine	170 - 290
LR4	Long Range 4-engine	330 - 550

Airbus A380 plotted for information as outside weight range for LR4 (575 tonnes)

¹ European Aviation Environmental Report, <https://ec.europa.eu/transport/sites/default/files/2019-aviation-environmental-report.pdf>, page 31.



2. The use of a percentage improvement (10%) as proposed to define a clean transport vehicle is unclear for aircraft noise. It is not clear from which number the 10% should be taken. Is it the absolute certified noise levels at each of the three measurement points? Or is it taken from the margin to the cumulative CH3 limits, a criterion that is used in CH4 and 14?

As an alternative we propose that the criterion for “clean” (in this context quietness of) aircraft would be based on the results of the study done by independent experts in the International Civil Aviation Organisation Committee of Independent Experts² who estimate that by 2027 “leading edge” technology would be 15 to 20 EPNdB cumulative below ICAO Chapter 14 standards, growing to about 25 EPNdB by 2037. In order to qualify as “clean (quiet) technology” one could envisage requiring a cumulative margin of 15-20 EPNdB to CH14 today, increasing gradually to 25 EPNdB cumulative by 2030. Note that already today some aircraft meet this requirement as can be seen from the figure above.

3. The proposal is also not clear on how the combined effect of Aircraft noise, Engine emissions and Aeroplane CO2 Emissions dimension should be determined. Is an improvement on each of the dimensions needed? Or can a bigger improvement in CO2 emission be used to offset an increase on noise level? We would consider the latter absolutely unacceptable as aircraft noise is still a significant problem affecting the health of millions of people in the EU.

On behalf of UECNA,

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² ICAO Environmental Report, 2019, Chapter One, Table 5 (https://www.icao.int/environmental-protection/Documents/EnvironmentalReports/2019/ENVReport2019_pg24-38.pdf)