

CONTRIBUTION TO THE PUBLIC CONSULTATION ON NOISE CERTIFICATION OF SUPERSONIC AEROPLANES

For the attention of Sandy R. Liu, Office of policy, International Affairs, Noise division,
US Federal Aviation Administration

July 13, 2020

Dear Mr. Liu,

UECNA - European Union against Aircraft Nuisance - is a pan-European NGO representing residents, overflowed by aircraft, suffering from noise and air pollution from aviation. UECNA welcomes the opportunity to comment on the Notice of Proposed Rulemaking (NPRM) on supersonic aircraft noise.

The impact of aircraft noise on people living near airports and under flight paths has been evidenced by many studies, some are summarized in the ICAO *Aviation Noise Impacts White Paper*¹. The WHO environmental noise guidelines published in 2018 for Europe² show how much noise is a health issue as people lose years of life in good health when submitted to aircraft noise. Exposure to noise is associated with high blood pressure, cardiovascular disease, and premature death.

Many countries and also ICAO have thus taken the position that environmental noise, and in particular aviation noise, is a concern and have addressed it through a willingness to reduce noise at source from aeroplanes. At ICAO level, this is addressed in the balanced approach which is now applied in many ICAO member states. The first pillar, and the one considered the most important, is the reduction of noise at source³.

Accepting noise standards for the LTO operations of supersonic aircraft which are not as stringent as those applied for subsonic aircraft negates all the efforts made to reduce noise at source.

Today, the maximum levels for new generations of subsonic jet aeroplanes are contained in Chapter 14 of Annex 16, Volume 1 of the Chicago convention – these should be applicable to supersonic aircraft. Environmental standards have to improve continuously, there should be no return to worse performance.

Populations overflowed by aircraft would not understand such a regression when they have been told by their governments/administrations of all efforts to the reduce environmental noise. This will be even more acute for an aircraft carrying a very small number of passengers compared to subsonic jet aircraft with similar levels of noise. The environmental impact per passenger of supersonic aircraft would exceed by far those of any other civil jet aircraft.

We also note that the NPRM does not address sonic boom although it proposes a noise standard applicable to Supersonic operation. We have experienced with Concord, the Franco-British project abandoned years ago, that sonic boom could be suffered on land even though Concord would only reach a supersonic speed above

¹ <https://www.icao.int/environmental-protection/Documents/ScientificUnderstanding/EnvReport2019-WhitePaper-Noise.pdf>

² <https://www.euro.who.int/en/publications/abstracts/environmental-noise-guidelines-for-the-european-region-2018>

³ <https://www.icao.int/environmental-protection/Pages/noise.aspx>



the sea. It is important that sonic boom be addressed in addition to the proposed standard for LTO operation of supersonic aeroplanes.

There are discussions on-going on noise standards applicable to supersonic aeroplanes within the ICAO's Committee on Aviation Environmental Protection (CAEP) which will lead to a decision by the ICAO's Assembly. The spirit of the Chicago convention is that standards are agreed upon at a global level, not individually by member states if an aircraft is meant operate in other ICAO member states.

Considering the above, UECNA regrets the decision of the United States to build a specific noise standard for LTO operations of supersonic aeroplanes. We hope that the FAA will review the proposed standard waiting for an agreement at ICAO level and in any case that the standard will be as stringent as those applicable to new subsonic jet aircraft of the same category.

With best regards,

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