

European Commission
DG Mobility and Transport
Mr Henrik Hololei
B – 1049 Brussels

EPA Network Secretariat
Kongens Nytorv 6
DK-1050
Copenhagen

February 2018

Dear Mr Hololei,

As members of the European Network of Heads of Environment Protection Agencies (EPA Network) we write to you regarding the recently decided strategy of noise abatement in freight railway traffic.

One of the most important environmental issues in densely populated areas is the problem of noise. Traffic noise from roads, railways and airports located close to settlements is not only annoying for residents, but also causes serious health problems with enormous economic costs. It is therefore of primary importance for city planners, engineers and politicians to make our cities quieter and healthier by applying abatement measures at source.¹

A substantial part of noise is caused by freight traffic that operates during night. Although this traffic has an important function for sustainable mobility in Europe and is planned to be further developed, the noise emissions of freight trains remain an ecological “Achilles' heel”. Night noise exposure of the population close to the major railway corridor Rotterdam-Genoa does highly exceed limit values, which impairs the health of the affected population in The Netherlands, Germany, Austria, Switzerland and Italy and frequently leads to severe complaints and protests against any expansion, upgrade or construction measures in the railway infrastructure. As this railway corridor is important for the entire European region, it is of prior interest to effectively protect these citizens from noise.

Under the Directives on rail traffic across Europe, the EU Commission has established pan-European noise thresholds for new types of rolling stock in the Technical Specifications for Interoperability (TSI) in 2005. Although the TSI were revised in 2011 and 2014 there still remains the unsolved problem of replacing the noisy cast iron block brakes in existing freight wagons, which are sometimes more than 40 years old.

With the aim of tackling this problem, the European Railway Agency (ERA) set up a task force in March 2016 for a further revision of the TSI noise, focusing on noise abatement in the existing rolling stock. The first approach was to retrofit the existing freight fleet to noise-reduced technology in two phases: In the first phase, it was thought to leave it up to the Member States (MS) to allow the operation of non-retrofitted vehicles on their railway network. In the second phase, only retrofitted vehicles were to be allowed to operate on the entire EU network. The

¹ [Future Brief, Noise abatement approaches](#), EU Commission, April 2017



This letter is based on discussions in the EPA Network's Interest Group on Noise Abatement. It is endorsed in this form by the following Agencies: German Environment Protection Agency (co-chair), Swiss Federal Office for the Environment (co-chair), Czech Environmental Information Agency, Environment Agency Austria.

second approach was to define so-called "quieter routes", which should only be accessible to vehicles with other than cast iron block brakes.

Following the task force, the working party started in October 2017 to work and only the second approach, the quieter routes, was pursued, with the idea that with this measure most of those railway lines with high level noise exposure would become quieter as a result of the only use of silent rolling stock. Moreover, a spillover effect was expected which would lead sooner or later to the use of silent wagons on the entire network. The first approach - the retrofitting of the entire existing fleet - was dropped as ERA feared that this approach was not likely to be accepted by the majority of MS.

Although possible resistance by MS that are not particularly affected by railway freight traffic noise should be expected, we would like to draw your attention to the fact that there are some strong arguments in favor of pursuing the first approach and banning all old and noisy freight wagons from the entire railway network:

- Firstly, it would be difficult to convince the public of a noise abatement measure that favors certain regions or communities but leaving the majority of people still exposed to noisy freight wagons. Even though the spillover effect might sooner or later lead to a similar result like the complete ban of noisy wagons, it remains a measure that everyone would consider as "unjust". Moreover, the fact that this rule is imposed by the EU would make it even more difficult to accept by local authorities and the public.
- Secondly, the quieter routes approach would induce significant additional efforts in planning processes for the railway companies as well as for infrastructure managers. Hence, the railway sector is strongly opposed to the concept of quieter routes pointing toward operational inefficiencies and procedural delays.
- Thirdly, the retrofitting of the existing noisy fleet and the complete ban of cast iron block brakes is not only possible but it is also the most efficient and just measure for solving the problem of noisy freight wagons. The Swiss example demonstrates cast iron block brakes will be banned from 2020 onwards. Germany introduced the same measure in order to efficiently protect its population from excessive railway noise.

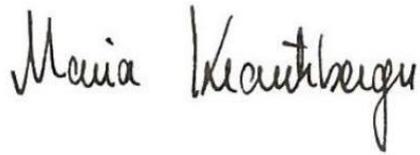
We appreciate the constant efforts of the EU Commission and ERA to further improve noise protection in Europe and we agree that there is a great need for action in terms of railway noise abatement. However, for the above reasons we strongly suggest to rethink the noise abatement strategy that solely relies on the concept of quieter routes and to consider alternative concepts.

With the aim of completely and efficiently solving the problem of old and noisy freight wagons and also to introduce measures that are perceived as just by the public, we propose to pursue the retrofitting process of freight wagons and to fix a clear date around 2020 when the ban of cast iron block brakes should enter into force in the EU. The concept of quieter routes could then be considered as an intermediate step that palliates the most urgent problems, but does not discriminate any region or community in the long term.

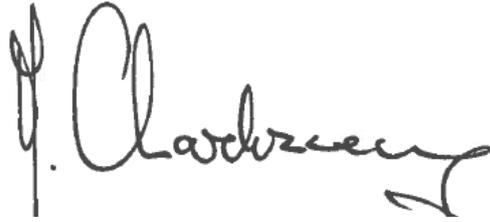


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Yours sincerely,



Maria Krautzberger
President of the German
Environment Agency



Marc Chardonens
Director of the Swiss Federal Office
of the Environment



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