

European Railway Agency
Mr Marcel Verslype
120 rue Marc Lefrancq
59300 Valenciennes
France

EPA Network secretariat
Kongens Nytorv 6
DK-1050
Copenhagen

11th December 2013

Dear Mr Verslype,

As members of the European Network of Heads of Environment Protection Agencies (EPA-Network) we write to you regarding the recently published preliminary draft of the revised NOI TSI¹. The draft proposal includes new requirements intended to reduce the noise from parking vehicles, new limit values on pass-by-, starting- and stationary noise and an extended scope, but no binding requirements for the existing freight wagon fleet which is mainly equipped with cast iron brake blocks.

Rail traffic noise is an important environmental health problem. Especially noise from the night time freight traffic is a health risk and major source of annoyance in many European countries. Therefore, the EPA-Network highly appreciates the efforts of the European Commission to tighten the noise emission regulation for rail vehicles that will reduce the economic burden on those responsible for implementing noise abatement measures as part of the noise action plans in accordance with the Environmental Noise Directive, 2002/49/EC.

The effectiveness of many noise abatement measures at railway infrastructure like rail-dampers, acoustic grinding etc. is directly linked with the acoustic quality of the rolling stock. The full effect of these infrastructure measures can only be achieved under optimum vehicle conditions. High efforts on track quality in combination with substandard rolling stock will have a much smaller benefit on the total noise emissions. The most effective noise reduction can only be achieved in combination of vehicle and infrastructure measures.

Moreover, as many reports² stated, the retrofitting of the existing freight fleet by replacing cast iron brake blocks with composite brake blocks is the most cost-efficient and effective measure for noise reduction and are superior to the building of barriers. Since up to now there is little incentive for wagon owner to retrofit their stock and a long-term ban of cast-iron brake blocks is still missing, we fear that there will be no significant improvement in the coming years.

Due to the long lifetime of rail vehicle, which are operated up to 40 years, noise limits of rail vehicle have a long ranging effect. The limit values in the NOI TSI currently under revision will determine the noise emissions of the fleet of 2050. The NOI TSI has therefore a

¹ Technical specifications of interoperability relating to noise (NOI TSI), draft 1.0:
<http://www.era.europa.eu/Document-Register/Documents/ERA-CON-2013-01-INT.pdf>

² e.g. <http://www.europarl.europa.eu/committees/en/studiesdownload.html?languageDocument=EN&file=72912>

considerable effect on the future noise exposure situation in Europe. The limit values defined in the present draft are not representing the state of the art, as documented, for example, in the research report "Determination of the state of the art of noise emissions of European rail vehicles"³.

The EPA-Network points out that the need to upgrade the existing fleet with low-noise brakes was already established in the current NOI TSI⁴. The European Commission had announced in this context to take initiative to discuss options for retrofitting of freight wagons with the relevant stakeholders in order to achieve a general agreement with the industry. We fear that due to the strong emphasis on the economic position of the sector, the much needed retrofit of existing stock will be delayed and that individual nations are forced to apply the much more expensive infrastructure related measures.

In conclusion we consider it necessary that the new NOI TSI

- should introduced stricter noise limits for new vehicles following the state of the art as recommend in the section 7.3 of the current NOI TSI, and that it
- should also apply for existing vehicles after a transition period.

We would be pleased to further discuss the topic with you or your representatives in our next IGNA-workshop which is planned to take place in Amsterdam sometime in March or April 2014.

Yours sincerely,

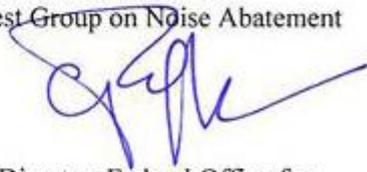
On behalf of the Interest Group on Noise Abatement of the EPA Network⁵

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Co-chair of EPA Network
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³ Umweltbundesamt, "Ermittlung des Standes der Technik der Geräuschemissionen europäischer Schienenfahrzeuge und deren Lärminderungspotentiale mit Darstellung von Best-practice Beispielen", S. Lutzenberger, Ch. Gutmann, Müller-BBM, Bericht M81916/12, Nov. 2012.

<http://www.umweltbundesamt.de/sites/default/files/medien/461/publikationen/k4441.pdf>

⁴ NOI TSI (2011/229/EU), <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:099:FULL:EN:PDF>

⁵ This letter is supported by a number of EPA Network members, namely the Polish Chief Inspectorate of Environmental Protection (GIOS), the Swiss Federal Office for the Environment (FOEN), the Serbian Environmental Protection Agency, the Federal Environment Agency Austria, the Italian National Institute for Environmental Protection and Research (ISPRA), the Dutch National Institute for Public Health and the Environment (not formally a member but the governmental research institute in the Netherlands that advises and assists government authorities on environmental issues including noise), the Federal Environment Agency Germany and the Portuguese Environment Agency.