

Making the railway system  
work better for society.

Registratur BAFU	
Planposition	Auftragsnummer
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To the attention of:

**Ms Maria KRAUTZBERGER**  
**President of the German Environment**  
**Agency**

**Mr Marc CHARDONNENS**  
**Director of the Swiss Federal Office of**  
**the Environment**

OM/AG/JD/D 2018/1538

Valenciennes, 27 MARS 2018

**Subject: EU strategy for noise abatement in freight railway traffic**  
**Ref: Your letter of 26 February 2018**

Dear Ms Krautzburger,

Dear Mr Chardonnes,

The Agency has clear evidence that many Member States are reluctant to accept any application of the TSI Noise to existing wagons and are absolutely against a total ban of wagons fitted with cast iron blocks.

Furthermore, in accordance with the agreement between OTIF and the European Union, any EU rule which would require retrofitting of existing wagons with composite brake blocks as a condition to access the EU network or any of its Member States would not apply to wagons coming from non-EU Contracting States.

Germany and Switzerland are probably the most advanced countries in railway noise abatement. However, a ban of all noisy wagons in 2020 is not practically achievable because the situation differs greatly between Member States, both in budgetary terms and technical characteristics of the wagon fleet.

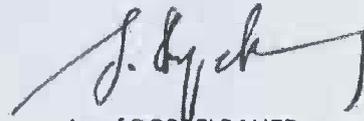
The Agency understands your arguments in favour of pursuing a complete ban to all old and noisy freight wagons from the entire railway network. However, to protect the population from the highest health hazards, the lines with the highest noise pollution levels should become quieter at the same time in all Member States and before all other lines. The lines with the highest noise pollution levels are those with the highest number of freight train passages during night.

The "quieter routes" approach will reduce noise levels where it is most needed, but this does not mean that nothing will be done for the other lines, where the health hazards are lower. Moreover, the benefits of the spillover effect should not be underestimated, as retrofitted wagons will circulate on both "quieter" and "non-quieter" routes.

Therefore, the Agency considers that the "quieter routes" approach is the fairest and most reasonably feasible implementation strategy at this stage. The impact assessment accompanying the Agency recommendation for the amendment of the TSI Noise will also address the additional administrative costs for the railway sector under the "quieter routes" approach.

Your proposal of a complete ban of cast iron brake blocks as a second step after the implementation of the "quieter routes" approach is an interesting scenario to be considered in the mid and long term. The return of experience after the implementation of the "quieter routes" approach will certainly provide useful elements to be considered before proceeding with the complete ban scenario.

Yours sincerely,



Josef DOPPELBAUER  
Executive Director

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