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Consultation on the draft of the limited revision of the TSI Noise

March 22, 2018

Dear Sir or Madam,

VDV is the association of public passenger and rail freight transport in Germany. The VDV advises and supports its member companies and politicians, supports the exchange of experience and know-how between the members and prepares technical, operational, legal and economic principles. About 150 rail freight companies operating rail freight on regional, national and international level are organised in VDV's rail freight section.

Rail noise is one of the great challenges for VDV and its member companies. For many years, VDV has given support to significantly reduce rail noise with suitable measures. VDV strongly supports the aim of the German government to halve rail noise until 2020, and in accordance with freight railways and civil society the prohibition of loud wagons in Germany from mid december 2020.

Against this background, we critically judge ERA's recommendation for amending the TSI Noise. Contrary to the common opinion of the European railway associations, ERA follows exclusively the so called „quieter routes approach“. From our point of view, this approach does not offer a suitable solution regarding the rail noise problem.

If the current ERA recommendation will have been implemented, quiet and noisy routes will permanently alternate in the rail network in Europe. This means that noisy routes will remain and, in any case, noisy freight trains are allowed to run on this routes in all member states.

In result, freight railways and infrastructure managers will be faced with additional operational obstacles to run their business.

Also for political reasons, a parallel existence of noisy and quiet routes ist not acceptable. Within the last few years, a comprehensive network of initiatives has arisen in Germany, acting against rail noise. They do not accept noisy freight trains

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even if they run on noisy routes. This is a considerable political risk for the further development of rail freight.

The „quieter routes approach“ has a number of disadvantages leading to operational, political and in consequence political difficulties not only for Rail Freight Undertakings. Therefore VDV prefers the so called “vehicle approach”: A stepwise prohibition of noisy wagons starting with the member states having a big rail noise problem, followed by a second step for cross-border-traffic including bilateral exemptions and ending with a last step for all international and domestic freight traffic, earliest in 2030.

On the other side, the acceptance of the „quieter routes approach“ could be significantly improved with some minor revisions. Most important is the possibility for member states to influence criteria for the definition of quieter routes and to declare all national routes to quieter routes.

As member of CER, we also support CER's position paper to this consultation.

We would be pleased if you could take our position into account in your further considerations regarding the revision of TSI Noise.

Kind regards



Managing Director Railway Transport