

General position of EIM

EIM welcomes the opportunity to react to EUAR's public consultation and acknowledges that noise is one of the most widespread public health threats in industrialized countries.

EIM underlines the need for speeding up the process of the freight wagon fleet to become quieter. A quieter freight wagon fleet will make freight transport via railway network more acceptable for citizens living along the railways. State authorities and infrastructure managers would have less need for building expensive and view blocking noise barriers.

New freight wagons have to comply the noise limits already since 2005. Existing freight wagons do not have to comply these noise limits and thus would run until end-of-life without having to become quieter.

EIM states that solutions to make existing wagons quieter should be available and should have no effect on the safety on the freight transportation. The costs for adapting existing freight wagons should not cause a modal shift towards road traffic.

The implementation strategy of introducing quieter routes at which all freight wagons should comply the noise limits is not preferred by EIM. This implementation strategy possibly causes a large administrative burden for the infrastructure managers and the freight train operators during the daily operation of capacity allocation and traffic management. A more general approach, such as a ban of noisy wagons at a certain time, seems to be more feasible.

EIM proposes several additions and improvements to the "quieter routes" approach in our detailed comments underneath. EIM strongly proposes to introduce the "once a quieter route, always a quieter route" approach to maintain the durable liveability along railway lines.

Remarks of EIM regarding the *Annex: Amendments to Technical specification for interoperability relating to the subsystem 'Rolling stock – noise' (Annex to Regulation 1304/2014)*

1.

EIM does not prefer the scope of this TSI to be extended to operational aspects. The introduction of operational aspects introduces a large administrative burden.

Other options are available to apply the noise limits to existing freight vehicles.

2.

OK

3.

Section 4

EIM states that there should be specific rules for the operation of wagons on quieter routes in case of scheduled infrastructure and wagons maintenance. The operation of wagons not compliant with point 7.2.2.2 on quieter routes should be possible in case of scheduled wagons maintenance where a quieter route is the only suitable way to access the maintenance workshop. Contingency

arrangements set out in clause 4.4.1 should be applicable in case of scheduled infrastructure maintenance activities where a quieter route is the only suitable alternative.

4.

OK

5.

Section 7.2

The start date is still open in the consultation version. EIM proposes the start date to comply the following rules:

- The start date should be feasible for wagon owners and operators. It should be possible to combine the retrofit of wagons with normal maintenance of wagons to lower the costs of the retrofiting
- Starting date should be the same as the starting date of the new time table (2nd Sunday of December)

EIM prefers to have an evaluation moment one year after the starting date of the “quieter routes” approach. The objective of the evaluation should be whether the change of the TSI has been enough to achieve the goal to tackle noise from railway freight traffic. Part of this evaluation would be the need and feasibility of a total ban at a certain moment.

6.

OK

7.

Appendix D, E, F and G:

D1:

EIM prefers “2016” to be replaced by “the year preceding the publication of the map/table”.

D2:

EIM prefers a table to define the quieter routes instead of a map. A table would contain the routes in a way railway lines are appointed within the logistic process. Maps can be useful to show the quieter routes to a broader public and should be made for communication purposes only.

EIM states that the Member States should be able to provide the Agency with the maps/tables depicting the quieter routes no later than 6 (instead of 3) months after the date of publication of this TSI.

D3:

EIM states that a route that once has been defined as a quieter route should remain a quieter route, even after updating the tables and maps. This is necessary in legal procedures concerning spatial planning so that there is no deterioration of the noise situation on a specific line in the future.

EIM states that during updating it should be possible to include predictive data when lines are built or revised in such a way that it is foreseen that the line will meet the requirements to become a quieter route or not. Also, in this case this is necessary in legal procedures to know beforehand that a line will be a quieter route to prevent high and long noise barriers from being built.