

## CONSULTATION ON THE DRAFT OF THE LIMITED REVISION OF THE TSI RELATING THE SUBSYSTEM ROLLING STOCK - NOISE (TSI NOISE)

SNCF contribution

SNCF would like to thank ERA for the constructive discussions held in the TSI noise revision-dedicated task force and working party, as well as for providing stakeholders with the opportunity to comment on the draft of the limited revision.

SNCF underlines it is providing an opinion on the “Final draft of the Technical specification for interoperability relating to the subsystem ‘rolling stock — noise’ (NOI TSI)”, last updated on 9<sup>th</sup> March 2018, and not on the “draft 2.0 of the Technical specification for interoperability relating to the subsystem ‘rolling stock — noise’ (NOI TSI)”, given that the former was sent out to stakeholders before the deadline of the consultation on the latter.

SNCF reminds that noise-abatement measures mean fitting costs and increased recurrent operational costs which worsen the relative competitiveness of rail if borne by the sector. Besides, massive deployment of composite brake blocks must not undermine railway safety, in particular the proper functioning of track circuits.

The European Commission mandated ERA to work on a limited revision of TSI noise based on the “quieter routes” approach. The methodology to be applied to define a route a quieter one should be simple and harmonised at EU level. **Effectively addressing rail freight noise and limiting operational constraints** requires the network of quieter routes to be large and applied within a reasonable time horizon allowing wagon keepers to adapt their fleets. SNCF stresses that these goals **can only be achieved if the following cumulative conditions are respected:**

- The reference night freight traffic used to define quieter routes should not exceed 5 trains;
- The date of entry into force of quieter routes should be 8<sup>th</sup> December 2024 as proposed in this draft;
- A route defined quieter should remain quieter even after updating of the list, so as to avoid uncertainty for both the rail sector and people living nearby railway lines.

In addition:

- The minimum length of a quieter route should be 2 km instead of 20 km, otherwise a number of densely-populated urban areas crossed by railway lines will be out of scope;
- Gathering and processing traffic data takes time. Considering that the Regulation is likely to be published early 2019, the reference year used in the definition of quieter routes should be 2017. This will allow IMs to deliver lists based on recent, aggregated and reliable data.

Please find in the Annex proposals for amendments that reflect these views.

## Appendix D Quieter routes

### D.1 Definition

A 'quieter route' is a part of the network with a minimum length of 20 km in the geographical scope of this TSI, on which the annual average daily operated freight trains in ~~the year preceding the publication date of Regulation xx/xxxx [amendment to TSI NOISE]2017~~ during night time was higher than ~~125~~.

Night time is defined for each Member State in its national legislation transposing Directive 2002/49/EC.

### D.2 Identification of quieter routes

The Member States shall provide the Agency with a list of quieter routes no later than 3 months after the date of publication of this TSI.

The list shall contain at least the following information:

- Start and end point of the quieter route. If one of these points is at the border of the Member State, it shall be reflected.
- Identification of the line(s) making up the quieter route
- Number of freight trains circulating during night on the quieter route

The Member States may provide maps illustrating the quieter routes on a voluntary basis. All lists and maps shall be published on the Agency website (<http://www.era.europa.eu>) no later than 6 months after the date of publication of this TSI.

### D.3 Update of quieter routes

Member States shall update the quieter routes at least every 5 years after 8<sup>th</sup> December 2024. The traffic data used shall refer to the year preceding the update. Member States shall provide the Agency with the updated quieter routes for their publication. In case of new or renewed lines added to the existing network, the expected traffic can be used for classification. Once defined quieter, a route remains a quieter route, even after updating.

The Agency shall inform the Commission of any changes to the quieter routes. The Commission shall inform the Member States of these changes through the committee referred to in Article 51 of Directive (EU) 2016/797. The updates shall be applicable from the next December timetable change following one year after the Commission has informed the Member States of the changes. The Agency shall publish the updated quieter routes on its website (<http://www.era.europa.eu>) one month after the Commission has informed the Member States.