Consultation - Bavarian Ministry of the Interior, for Building and Transport

Dear Sir or Madam,

thank you for giving us the opportunity to send you our views regarding the draft of the limited revision of the TSI Noise. I`m answering from the viewpoint of the Bavarian Ministry of Housing, Building and Transport.

Freight wagons are in operation for decades and low-noise break blocks are state of the art for most freight wagons. The ‘quieter route’ approach however does neither fulfill the requirements of noise protection nor those of effective railway operation.

The german federal state of bavaria is heavily affected by the growing number of freight trains. In our densely populated state, nearly each railway track appropriate for freight services – even the secondary lines – affect settlements. Further or later a freight train passes cities on each possible routing. Though, the quieter route approach will result in shifting freight traffic from potent main lines, where partly noise barriers exist, to secondary lines without noise abatement measures, less capacity and less technical standard (e. g. at level crossings). That also means an extension of the rail noise problem to secondary lines, and people not affected from rail noise so far will suffer from noise in future. This result of a european legislative act is not communicable to the german public, which is very sensitive to rail noise. Additionally, more and more secondary routes will become quiet routes, and the options to operate with noisy wagons will decrease corresponding. Therefore the need to retrofit all wagons seems to be a question of only few years. But in the meantime, the quiet route approach matters a lot of operational and administrative burdens to all involved parties.

It seems impossible for railway undertakings (RU) to manage the quieter routes approach operational. RU´s typically order a route from the infrastructure manager (IM) a long time before the train runs in effective. Neither the IM, nor the RU know at this time of what wagons from what keepers the real train will be composed later. The RU usually will be given a slot on a main line (quiet route), which are the fastest and most capable routes. But, if the later real train covers some noisy wagons, the routing has to be switched in last minute. This is unlikely considering the need for track knowledge by the driver, and furthermore it seems impossible for authorities to control if a permitted case of degraded mode is given or not.

Therefore we plead in favor of making the TSI Noise applicable to all freight wagons in international traffic as far as suitable low-noise break-blocks are available. Alternatively, dense populated member states with a very sensible public like germany should have the possibility to declare their whole railway network to a quiet network.

In addition, we share the comments addressed to the agency by german federal railway (Deutsche Bahn AG) during this consultation.

Best regards

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