

Public consultation on the draft of the limited revision of the TSI relating the subsystem rolling stock - Noise (TSI Noise)

Transportstyrelsen would like to thank ERA for the opportunity to comment on the draft document. Transportstyrelsen considers it an interesting proposal in the mitigation of noise levels affecting public health.

The proposal, however, is infested with a couple of major drawbacks.

First of all, we have several times in the working group drawn the groups attention to the safety issue of using composite brake blocks in severe winter conditions; conditions that persevere 4-5 months/year. There are even an incident where a train has passed a signal at danger (SPAD) due to poor or non-existing brake performance of the composite brake blocks. Also, recent tests in Finland indicates clearly that the brake performance of composite brake blocks is poor.

Safety and maintained competitiveness of the Swedish Railways sector are key elements. On the one hand, the composite brakes show evident inadequate performance, leading to probable high risks. To mitigate these safety threats costly operative measures need to be put in place.

Secondly, the draft legislation is proposed to enter in force within a short term. This will cause increased costs for retrofitting and necessary adjustment measures, as the 1-1-solution is not feasible on the Swedish wagon fleet. Thus severely damage the Swedish Railway business. The proposal will cause direct unproportioned increase of costs – operative and material – hence hampering the railway undertakings.

Thirdly, the introduction of quieter routes will impede and unlawfully restrict the access to the European market, and only offer an unbalanced benefit for a few Member States. Quieter routes in a Member State will handicap the Swedish existing wagon fleet automatically. Hence, limiting the possibility to offer business opportunities on the European market for the transport

buyer, and its products. This will affect the Swedish industrial market economy in its entirety.

The consequences will lead to modal shift from rail to road as an immediate consequence of the increased operative and material costs directly linked to retrofitting and risk mitigating measures. Transport business will go from rail to road. Railway will lose its competitiveness and performance.

Following are estimated costs of the proposal:

The costs to retrofit, presuming no operative restriction, the fleet in Sweden would be :

The cost of retrofitting a wagon in Sweden ranges from: 7000 SEK – 80 000 SEK

(1 euro = 10 SEK)

- Wagons 1:1 used for transport in Sweden: 9 000 wagons x 20 000 SEK = 180 000 000 SEK
- Brake system retrofit : 1 500 wagons x 80 000 SEK = 120 000 000 SEK
- Wagons with load changing device : 3 800 wagons x 70 000 SEK = 266 000 000 SEK
- Wagons which need kink valve : 1 300 wagons x 40 000 SEK = 52 000 000 SEK

Grand total : 618 000 000 SEK one-off costs

The railway sector in Sweden estimates that the increase in maintenance costs yearly is: 0,3 SEK/km x 700 000 000 km = 200 000 000 SEK yearly

In addition, the administrative costs due to less efficient management of the fleet for each wagon for each trip is estimated to be around 200 SEK = 200 000 000 SEK

Grand total : 400 000 000 SEK yearly costs

Furthermore, the poor brake performance in severe winter conditions will have to be mitigated by operative measures such as shunting cast-iron brake blocked wagons in all trains. The operative costs in order to mitigate the risk of loss of brake performance in wintertime is 275 SEK /~28€ wagon shifted in a train = 400 000 000 SEK during five winter months.

The operative measure suggested by ERA is to shift wagons equipped with safe cast iron brake blocks into the trains in wintertime; half of the wagons in a train would have to be equipped with safe brake blocks. Even with the

wagon composition measures the transport need to decrease the speed of the train from 100 km/h to 80 km/h to uphold a normal safety performance level. The mainline is saturated and a loss of speed would immediately lead to a loss of capacity on the line in the range of 20-25%. The estimation is that this capacity loss would be shifted from rail to road. These costs amount to 145 000 000 SEK in direct costs.

Grand total : 545 000 000 SEK

Finally, in order to accommodate the wagons required at the borders and in main hubs for the shifting in order to form trains with guaranteed brake performance necessary infrastructure investments consisting in new tracks would be required to be built.

The cost of this would be not less **than 2 billion SEK/~2 200 000 €**.

The indirect costs for the modal shift, etc would amount to **479 000 000 SEK**.

So, the proposal would lead to the following costs for the Swedish railway undertakings and Swedish society:

One-off costs : 2 618 000 000 SEK

Direct yearly costs : 945 000 000 SEK

Indirect yearly costs : 479 000 000 SEK

Med vänlig hälsning

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