Rail sector’s view on the Noise TSI revision

11th UIC Railway Noise Workshop
Brussels, 14 November 2017
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Noise mitigation remains a top sector priority

- Noise is the main remaining environmental challenge for the sector
- The sector strategy is developed to achieve quieter freight transport
- CER is actively contributing to the work conducted by the ERA
So many open points remain on the table

- No clarity on the procedure to implement the chosen strategy
- The challenge of political communication of quieter routes
- Lack of comprehensive impact assessment
- Specific cases such as the Nordic winter conditions
- Low level of available financing
Only a balanced approach will work out

**Ideal noise mitigation policy**

<table>
<thead>
<tr>
<th>Simple</th>
<th>Pragmatic</th>
<th>Progressive</th>
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<tbody>
<tr>
<td>• Administrative and operational costs to be minimum</td>
<td>• EU solution to avoid any national ban</td>
<td>• Step-by-step migration towards a quieter wagon fleet</td>
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<td>• Easy for RUs and IMs</td>
<td>• Maintain the authorisation of wagons</td>
<td>• Increasing ambition</td>
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Do not forget the **Environmental Noise Directive**:
- Costs should be internalised (the polluter pays principle), also ensuring a level playing field;
- Public funding needed: funding to cover the full life cycle costs to combat rail freight noise remains crucial
Call for a wider mandate: 3 areas for further reflection

- Granting flexibility and tackling noise issue where it is the most accurate
- Assessment of the pros & cons of both the original (vehicle-based) approach and the quieter routes approach
- An impact on the intermodal competitiveness of rail freight to stay in the centre of the considerations
Financing

- CEF 2016 call was a real success
- 3rd call should be launched ASAP
- Sector demands a higher co-funding rate and more budget in the CEF2
- Member states should provide additional non-discriminatory funding
- NDTAC system should be extended to compensate higher operating costs
Urgently match the funding with costs

The EU support for encouraging the retrofitting of wagons is limited as it covers only up to 20% of eligible costs.
Policy requests from CER

- Implement an EU-wide solution with a flexibility for the member states
- Avoid any operational impacts (e.g. speed restrictions, night bans)
- Provide public funding consistent with the policy goals
- Proceed with internalising noise costs for all modes (polluter-pays)
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