

Näringslivets Transportråd

- för transportköpare

Swedish Shippers' Council

Stockholm 21 March 2018

EU Agency for railways

006REC1072@era.europa.eu

Swedish Shippers' Council's comments on the draft of the limited revision of the TSI relating the subsystem rolling stock - Noise (TSI Noise)

About Swedish Shippers' Council (SSC)

SSC represents the interests of companies and organisations in the industry and trade sector in Sweden. SSC is a transport buyer, shipper organisation and is recognised as the voice of Swedish transport buyers. For all of the members, transport is an indispensable link to their customers. Efficient and sustainable transport and logistics are therefore critical for the competitiveness of the Swedish industry and the socio-economic welfare in Sweden. SSC is also a member of the European Shippers' Council in Brussels.

SSC's comments on the draft

SSC recognizes that noise from railway rolling stock is a problem, especially in densely populated areas in Central Europe with intense railway traffic. Noise from rolling stock on railways is already regulated at EU level by the technical specification for interoperability (TSI) noise limit values imposed to wagons but more needs to be done in order to approach the noise problem effectively. The limited revision of the TSI noise is one, limited, way of tackling with the issue.

The SSC notices that the consultation concerns a draft with many uncertainties still remaining, which makes it hard to predict and take a position on possible consequences. The expected national exceptions make it even harder.

According to SSC, it is vital that retrofitting existing wagons with composite brake blocks does not undermine railway safety, in particular to freight operations in winter conditions and/or related to track circuits once retrofitted freight wagons are massively introduced on the network. Safety must always come first and safe functioning of composite brake blocks in winter conditions should be verified before the regulation enters into force. Composite brake blocks do not ensure sufficient braking performance in winter conditions and have caused several serious incidents. Fortunately, no accidents have occurred. The most effective way to ensure sufficient braking performance even in harsh winter conditions is to use cast iron brake blocks until new technology that ensures both safety and quieter rolling stock is in place.

Swedish companies are export oriented and shippers rely on efficient and competitive transports and logistics, also outside the Swedish borders. Railway interoperability facilitates free movement of goods and is therefore necessary for the industry. In SSC's opinion there should be a strive to find a solution that on the one hand safeguards a smooth operation of rail freight transport from, to and through countries with high noise sensitivity and, on the other hand, minimises the administrative and financial burden of implementing measures such as retrofitting in those member states, where citizens are less exposed to noise and thus having lower public concern which is the case in the less populated, rural areas of Scandinavia and Finland. Rail freight is significant to the industry in the Nordic region, why SSC believes that exceptions should be considered in the ongoing work, also considering the safety aspects, in the rural areas of the region. At the same time transport buyers in northern Sweden should be able to choose direct rail transport to continental Europe even in the future.

Limited interoperability, i.e. movement of goods, is also one reason to why SSC is skeptical to the idea of quieter routes. SSC means further that quieter routes as proposed in the draft would make rail freight even more inflexible than today and in practice create a new trade barrier.

Based on cost calculations carried out by the International union of wagon keepers (UIP) Swedish railway organisations¹ have estimated that maintenance costs will increase by approximately 30 percent, which implies a cost increase for rail freight by 5-7 percent. The composite brake blocks will also wear out faster. In addition to increased maintenance costs, there will also be a cost for retrofitting existing wagons. The increased costs will be transferred to shippers and harm their competitiveness, which in the end also reduces the competitiveness of the railway. This could cause the noise problem to shift from rail to road, and thereby even closer to residents in sensitive areas, increasing CO₂-emissions at the same time.

SSC also supports in its main points comments on the draft made by ASTOC – the Association of Swedish Train Operating Companies.

Swedish Shippers' Council



Per Bondemark
Chairman



Guy Ehrling
Secretary general

¹ Svenska privatvagnföreningen, SWEDTRAIN and the Association of Swedish Train Operating Companies (ASTOC)