

Effective reduction of noise generated by rail freight wagons in the European Union


The European Commission wishes to explore with the all relevant stakeholders on how best to contribute to the reduction of the number of people regularly affected by rail noise. This consultation assists the Commission in exploring the scope for possible EU action without harming the competitiveness of rail transport.


Questions marked with an asterisk * require an answer to be given.

1. Information about the respondent

1.1. In what capacity are you filling out this questionnaire? *

- ☐ As a citizen
- ☐ Local or regional public authority
- ☐ National public authority
- ☐ Association
- ☐ Non-Government Organisation/Civil Society Organization
- ☐ Company
- ☐ Academia
- ☐ Other

 1.2. Please specify "Other" *

 1.3. Please give the size of the company you work for *

- ☐ Micro enterprise (less than 10 employees)
- ☐ Small and medium-sized enterprise-SME (10 to 249 employees)
- ☐ Large enterprise (250 employees or more)
- ☐ Do not know



1.4. Could you specify what kind of organisation you represent? *

- ☐ Association of citizens
- ☐ Association of trade unions
- ☐ Association of industries
- ☐ Association of freight forwarders
- ☐ Association of rail operators
- ☐ Association of wagon owners
- ☐ Association of civil society organisations
- ☐ Association of national authorities
- ☐ Association of regional authorities
- ☐ Other



1.5. Please specify "Other" *



1.6. What is the name of the authority/association/company/organisation you represent? *



1.7. How many members does your association or organisation represent?



1.8. Is your association/organisation registered in the Transparency Register of the European Commission (http://europa.eu/transparency-register/index_en.htm)? *

- ☐ Yes
- ☐ No



1.9. Please indicate the identification number

1.10. Please specify your countries of operation or residence? * (at least 1 answers)

- | | | |
|---|---|--|
| <input type="checkbox"/> AT – Austria | <input type="checkbox"/> BE – Belgium | <input type="checkbox"/> BG - Bulgaria |
| <input type="checkbox"/> CY - Cyprus | <input type="checkbox"/> CZ - Czech Republic | <input type="checkbox"/> DE - Germany |
| <input type="checkbox"/> DK - Denmark | <input type="checkbox"/> EE - Estonia | <input type="checkbox"/> EL - Greece |
| <input type="checkbox"/> ES - Spain | <input type="checkbox"/> FI - Finland | <input type="checkbox"/> FR – France |
| <input type="checkbox"/> HU – Hungary | <input type="checkbox"/> IE - Ireland | <input type="checkbox"/> IT - Italy |
| <input type="checkbox"/> LT - Lithuania | <input type="checkbox"/> LU – Luxembourg | <input type="checkbox"/> LV - Latvia |
| <input type="checkbox"/> MT - Malta | <input type="checkbox"/> NL - Netherlands | <input type="checkbox"/> PL - Poland |
| <input type="checkbox"/> PT - Portugal | <input type="checkbox"/> RO - Romania | <input type="checkbox"/> SE – Sweden |
| <input type="checkbox"/> SI - Slovenia | <input type="checkbox"/> SK - Slovakia | <input type="checkbox"/> UK - United Kingdom |
| <input type="checkbox"/> HR - Croatia | <input type="checkbox"/> MK - former Yugoslav Republic of Macedonia | <input type="checkbox"/> TR - Turkey |
| <input type="checkbox"/> IS - Iceland | <input type="checkbox"/> LI - Liechtenstein | <input type="checkbox"/> NO - Norway |
| <input type="checkbox"/> CH – Switzerland | <input type="checkbox"/> RU - Russia | <input type="checkbox"/> Other |



1.11. Please specify "Other" *

1.12. Please indicate your contact details (name, email and telephone) *

1.13. Do you consent to the publication of your response by the European Commission?

Contributions received may be published on the Internet, together with the identity of the contributor unless the contributor objects to publication of the personal data on the grounds that such publication would harm his or her legitimate interests. In this case the contribution could be published in anonymous form. *

- ☐ Yes
- ☐ Yes, but anonymously
- ☐ No

2. Data Sources

2.1. If you know any reports, studies, surveys, or data that are important for this impact assessment, please give a reference. If possible include a URL to the source, or upload the file(s).

3. Extent of the problem

The Commission notes that freight wagons not conforming to the Technical Specification for Interoperability on Noise for conventional rolling stock (TSI-Noise) limits are the most important sources of rail noise, and that existing measures are insufficient to reduce the level of rail noise quickly and effectively. In this section of the public consultation, the European Commission seeks to solicit your opinion regarding the depth and significance of the problem.

3.1. Please rank the following freight transport policy challenges according to their importance.

Rank from 1 to 7 where 1 is the most important and 7 is the least important.

- a: 1
- b: 2
- c: 3
- d: 4
- e: 5
- f: 6
- g: 7

[illegible]

3.2. How do you rate the problem of rail noise in your area of residence or operation? *

- ☐ There is no issue of rail noise in my area of residence or operation
- ☐ Not important
- ☐ Somewhat important
- ☐ Important
- ☐ Very important
- ☐ Don't know / No view

3.3. In your opinion and in general, what are the negative impacts of rail noise? (maximum 2000 characters)

3.4. Please rank the following noise sources according to their contribution to noise levels in your area of residence or operation?

Rank from 1 to 5, where 1 is the largest contributor to noise levels and 5 is the least.

- a: 1
- b: 2
- c: 3
- d: 4
- e: 5

	a	b	c	d	e
3.4.1. Freight trains *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3.4.2. Passenger trains *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3.4.3. Passenger cars *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3.4.4. Trucks *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3.4.5. Airplanes *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

3.5. Are there any other important noise sources?

Where would you see these then compared to the sources listed above? (maximum 2000 characters)

3.6. How would you rate your level of knowledge about issues regarding rail noise or leading to rail noise? *

- ☐ Very low
- ☐ Low
- ☐ Medium
- ☐ High
- ☐ Very high



3.7. To what extent do you think the below mentioned aspects contribute to the problem of rail noise?

- a: Not important
- b: Somewhat important
- c: Important
- d: Very important
- e: Don't know / No view

	a	b	c	d	e
3.7.1. Quality of wheels *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3.7.2. Quality of rails *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3.7.3. Speed of trains *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
3.7.4. Amount of traffic *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

3.8. Are there any other aspects contributing to the problem of rail noise? (maximum 2000 characters)



3.9. Please describe how the rail noise issues affect your business, or the business of those your organisation represents (maximum 2000 characters)



3.10. During which period are you most affected by rail noise? *

- ☐ I am not affected by rail noise
- ☐ During the day
- ☐ At night
- ☐ Both at night and during the day



3.11. Please describe how exposure to rail noise affects you (maximum 2000 characters)



3.12. Would you consider it more acceptable to live close to train routes if rail noise was reduced noticeably? *

- ☐ Yes
- ☐ No
- ☐ I am indifferent



3.13. Would you consider it more attractive to establish or relocate a business close to a rail line if noise was reduced noticeably? *

- ☐ Yes
- ☐ No
- ☐ I am indifferent / No opinion

4. Assessment of existing measures to reduce or limit rail freight noise




4.1. What measures have already been considered/implemented to tackle the problem of rail freight noise in your area/country/region of residence/operation? *

- | | | |
|--|--|--|
| <input type="checkbox"/> Noise barriers | <input type="checkbox"/> Insulated windows | <input type="checkbox"/> Measures on the track (dampers, stiff pads, bi-bloc sleepers, rail grinding) |
| <input type="checkbox"/> Speed reduction | <input type="checkbox"/> Financial incentives for the retrofitting of freight wagons with quieter brakes | <input type="checkbox"/> Noise-differentiated track access charges (i.e. measures for adjusting charges dependent on noise emission) |
| <input type="checkbox"/> Legal noise emission ceiling | <input type="checkbox"/> Programmes to manage rail roughness/track upgrading/new design | <input type="checkbox"/> Regulation for track condition and design |
| <input type="checkbox"/> Public funding for noise abatement programmes | <input type="checkbox"/> EU funding for research and development | <input type="checkbox"/> Local funding for tackling specific noise problem |
| <input type="checkbox"/> Information to stakeholders | <input type="checkbox"/> Voluntary commitment | <input type="checkbox"/> Other |
| <input type="checkbox"/> None | <input type="checkbox"/> I don't know | |



4.2. Please specify "Other" (maximum 2000 characters)


4.3. If possible, please describe the most important measures already taken. Please indicate whether certain combinations of measures have been used effectively. (maximum 2000 characters)

 4.4. How effective were the measures taken so far in reducing rail noise? *


- ☐ Effective
- ☐ Effective to a certain extent
- ☐ Ineffective
- ☐ Don't know / No view

4.5. Please provide further comments on your answer about the effectiveness of measures so far.

(maximum 2000 characters)

 4.6. Do the measures implemented at the national/local level restrict mobility of people and/or goods? *

- ☐ Yes
- ☐ No
- ☐ I don't know

 4.7. In which manner? (maximum 2000 characters)

4.8. How quickly is the retrofitting of quieter brakes for existing rail freight wagons implemented in your region of residence/operation? *

- ☐ There is a substantial progress
- ☐ There is a progress
- ☐ There is very little progress
- ☐ There is no progress
- ☐ Don't know / No view

4.9. To what extent do you think the following objectives are important to be achieved in the future?

- a: Not important
- b: Somewhat important
- c: Important
- d: Very important
- e: Don't know / No view

	a	b	c	d	e
4.9.1. Business as usual *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.9.2. Reducing noise from rail freight traffic *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.9.3. Maintaining competitiveness of the rail freight sector *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.9.4. Maintaining interoperability of the rail network, i.e. the ability of freight trains and wagons to move across internal EU-borders freely *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

5. EU action

The urgency of the issue and political pressure have led some countries to propose unilateral measures. The Commission fears that this could result in major perturbations for provision of cross-border rail services and barriers for railway interoperability, with likely distortion of competition and obstacles to trade and provision of services. In this section of the questionnaire, you are invited to weigh in on the need for EU action rather than unilateral actions.

5.1. Are measures currently taken at national/local level sufficient to achieve a reduction of rail freight noise? *

- ☐ Yes
- ☐ No
- ☐ Don't know / No view

5.2. Do you think that current unilateral measures have acted as barriers to railway interoperability or that future unilateral measures will act as barriers to interoperability? *

- ☐ Strongly agree
- ☐ Somewhat agree
- ☐ Don't know / No view
- ☐ Somewhat disagree
- ☐ Strongly disagree

5.3. Do you think that EU initiatives and policy would contribute to the broader take-up of effective measures across the EU? *

- ☐ Strongly agree
- ☐ Somewhat agree
- ☐ Don't know / No view
- ☐ Somewhat disagree
- ☐ Strongly disagree

5.4. How should the EU action be targeted as to ensure that it would not undermine the subsidiarity principle and would have the highest potential for EU value added? (maximum 2000 characters)

6. Relevance of policy options

This section provides a brief description of measures that are implemented or are under consideration by the Commission to combat the problem of rail noise. You are subsequently invited to rate the relevance of each measure.

6.1. Status quo

This is the baseline scenario presenting how the future situation is likely to evolve under the current legal framework (TSI Noise applicable to new wagons only, non-mandatory noise-differentiated track access charges (NDTAC), 20%

co-financing of retrofitting under the Connecting Europe Facility), including assessing the effects this will have on the health of citizens and on the competitiveness of railways. Likely future developments are that some progress will be made, though fragmented with a possible risk for reverse modal shift.

6.2. Subsidies approach

This option foresees additional financial incentives (subsidies) to improve rate of retrofitting of wagons at EU level with "silent" brake blocks.

It is important to estimate the level and exact type of the incentive that will have the optimal result. A sufficiently high incentive could deliver in preventing over-utilisation, increasing quality of life and wellbeing as it could accelerate retrofitting. Still it might not guarantee a common approach or legal clarity. While it could build acceptance, much will depend on the chosen source of funding (EU or national), as, given the current economic environment the allocation of public funds has developed into a sensitive issue.

6.2.1. To what extent do you find the 'subsidies approach' appropriate to tackle the problem of rail freight noise? *

- ☐ Not appropriate
- ☐ Little appropriate
- ☐ Neutral
- ☐ Quite appropriate
- ☐ Very much appropriate
- ☐ Don't know

6.2.2. When will it be technically and administratively feasible to introduce this approach? *

- ☐ It is possible already
- ☐ Within 1-3 years
- ☐ Within 3-6 years
- ☐ Within 6-10 years
- ☐ In 10 years or after
- ☐ It will never be possible
- ☐ Don't know / No view

6.2.3. Will subsidies for retrofitting distort competition between operators? *

- ☐ Yes
- ☐ No
- ☐ I don't know



6.2.4. What type of subsidy do you think is the most effective?

Pick your two favourites* (between 2 and 2 answers)

- | | | |
|--|--|--|
| <input type="checkbox"/> Co-financing of retrofitting cost | <input type="checkbox"/> Co-financing of increased operational costs | <input type="checkbox"/> Lump sum payments |
| <input type="checkbox"/> Miles-based (depending on intensity of use of retrofitted wagons) | <input type="checkbox"/> Other | |



6.2.5. Please specify "Other"* (maximum 1000 characters)



6.2.6. What is the minimum level of co-financing of retrofitting costs that would have to be provided to be effective (while still being feasible for public budget)?*

- | | | |
|----------------------------|----------------------------|-----------------------------|
| <input type="radio"/> 10 % | <input type="radio"/> 50 % | <input type="radio"/> 90 % |
| <input type="radio"/> 20 % | <input type="radio"/> 60 % | <input type="radio"/> 100 % |
| <input type="radio"/> 30 % | <input type="radio"/> 70 % | |
| <input type="radio"/> 40 % | <input type="radio"/> 80 % | |



6.2.7. Please can you comment on why you believe this is the right level of co-financing?
(maximum 2000 characters)



6.2.8. What is the minimum level of co-financing of increased operational costs that would have to be provided to be effective (while still being feasible for public budget)? *

- | | | |
|----------------------------|----------------------------|-----------------------------|
| <input type="radio"/> 10 % | <input type="radio"/> 50 % | <input type="radio"/> 90 % |
| <input type="radio"/> 20 % | <input type="radio"/> 60 % | <input type="radio"/> 100 % |
| <input type="radio"/> 30 % | <input type="radio"/> 70 % | |
| <input type="radio"/> 40 % | <input type="radio"/> 80 % | |



6.2.9. Please can you comment on why you believe this is the right level of co-financing?

(maximum 2000 characters)

6.2.10. Do you have further comments on the subsidies approach?

We are interested in hearing any further comments as to the appropriateness of the policy measure and suggestions as to the implementation, e.g. the duration of an incentive program, on what money should be spent, and the monitoring aspects of this approach. (maximum 5000 characters)

6.3. Noise Differentiated Track Access Charges (NDTAC) approach

This approach examines in detail the effects of optional introduction of NDTAC on the rate of retrofitting of freight wagons with "silent" brake blocks, possible "spill-over-effects" and foresees a comparison with the possible effects of a mandatory NDTAC. Here, the extent to which this option will deliver will depend, as the experience so far has shown, on the actual design of the NDTAC system. A properly designed and technically feasible and cost-effective system could provide a best practice scenario to have positive impacts on the whole of the EU.

6.3.1. To what extent do you find Noise-differentiated track access charges (NDTAC) appropriate to tackle the problem of rail freight noise? *

- ☐ Not appropriate
- ☐ Little appropriate
- ☐ Neutral
- ☐ Quite appropriate
- ☐ Very much appropriate
- ☐ Don't know


6.3.2. When will it be technically and administratively feasible to introduce this approach? *

- ☐ It is possible already
- ☐ Within 1-3 years
- ☐ Within 3-6 years
- ☐ Within 6-10 years
- ☐ In 10 years or after
- ☐ It will never be possible
- ☐ Don't know / No view

6.3.3. In your opinion what should be the basis for NDTAC?

Choose up to three * (between 1 and 3 answers)

- | | |
|---|---|
| <input type="checkbox"/> Number of axles | <input type="checkbox"/> Weight of axles |
| <input type="checkbox"/> Type of axles | <input type="checkbox"/> Generation of wagons |
| <input type="checkbox"/> Type of wagons | <input type="checkbox"/> Wagon brake type |
| <input type="checkbox"/> Don't know / No view | <input type="checkbox"/> Other |

 6.3.4. Please specify "Other" * (maximum 1000 characters)

6.3.5. What form of NDTAC do you prefer? *

- ☐ Bonus (i.e. reducing track charges for TSI-Noise compliant wagons)
- ☐ Bonus-malus (i.e. reducing track charges for TSI-Noise compliant wagons and increasing them for non-compliant wagons)
- ☐ Malus (i.e. increasing track charges for non-compliant wagons)
- ☐ Don't know / No view

6.3.6. To what extent should the track charges be differentiated for non-compliant and compliant wagons in order to establish a meaningful incentive to retrofit those wagons? *

- ☐ 1-3 %
- ☐ 4-6 %
- ☐ 7-10 %
- ☐ 11-15 %
- ☐ 16-20 %
- ☐ More than 20%
- ☐ Don't know / No view

6.3.7. Should there be any differentiation in NDTAC between day and night? *

- ☐ Yes
- ☐ No
- ☐ Don't know / No view



6.3.8. In which manner? (maximum 2000 characters)

6.3.9. Should NDTAC be dependent on the size and density of population exposed to rail freight noise? *

- ☐ Yes
- ☐ No
- ☐ Don't know / No view

6.3.10. Measures such as 'Low emission zones' and 'Congestion charging zones' are partially targeted at bringing about a modal shift from road freight transport to rail freight transport. Do you think that NDTAC will create a modal shift from rail back to road? *

- ☐ Yes, to a large degree
- ☐ Yes, to a certain degree
- ☐ No
- ☐ I don't know

6.3.11. Do you think that introduction of the NDTAC schemes by some Member States only can have any positive spill-over effects for other Member States? In particular, could it constitute a sufficient incentive which will bring about the change also in those countries where NDTAC is not yet introduced, or will it encourage the other countries to introduce similar schemes? (maximum 2000 characters)

6.3.12. Do you think that introduction of the NDTAC schemes by some Member States only can have negative effects for other Member States? In particular, could it negatively affect competitiveness of operators from those countries where NDTAC scheme is not introduced? (maximum 2000 characters)

6.3.13. Do you have further comments on the NDTAC approach?

We are interested in hearing any further comments as to the appropriateness of the policy measure and suggestions as to the implementation, e.g. what elements should or should not be included in NDTAC, how can it be prevented that NDTAC negatively affects competition between Member States and how can monitoring be done? (maximum 2000 characters)

6.4. Technical Specification for Interoperability (TSI) Noise approach

This option differs from the market-based instruments (subsidies and NDTAC approaches), by introducing a legal limitation on the level of noise produced by existing wagons for all the lines in the EU. This option might be contested on the grounds of availability of funds, higher costs, technical difficulties, and the possible reduction in rail competitiveness. All these factors will have to be assessed in order to estimate an appropriate date for such an introduction. A number of possible variations concerning transition periods can be envisaged. It might be relevant to consider combining this option with the subsidies approach to mitigate negative effects on the competitiveness of the rail sector.

6.4.1. To what extent do you find 'TSI noise approach' appropriate to tackle the problem of rail freight noise? *

- ☐ Not appropriate
- ☐ Little appropriate
- ☐ Neutral
- ☐ Quite appropriate
- ☐ Very much appropriate
- ☐ Don't know

6.4.2. When will it be technically and administratively feasible to introduce this approach? *

- ☐ It is possible already
- ☐ Within 1-3 years
- ☐ Within 3-6 years
- ☐ Within 6-10 years
- ☐ In 10 years or after
- ☐ It will never be possible
- ☐ Don't know / No view

6.4.3. Do you think that this policy measure could lead to negative consequences for rail operators, wagon keepers or other market players? *

- ☐ Yes
- ☐ No
- ☐ Don't know / No view



6.4.4. Please specify the probable extent of these consequences. (maximum 2000 characters)

6.4.5. Do you have further comments on the TSI-Noise approach? We are interested in hearing any further comments as to the appropriateness of the policy measure and suggestions as to the implementation, e.g. on how monitoring can be done. (maximum 2000 characters)

6.5. TEN-T approach

This option is limited in its scope of application to the railway TEN-T network. Reduction of rail noise could be achieved by introduction of noise emission ceilings (limiting daily average emissions along the line) or application of other approaches (NDTAC, TSI Noise) to the TEN-T network only. The main differentiating characteristic is the focus on the international dimension of the railways and the intensity of freight volumes. In addition it introduces the risk of reduced competitiveness so long as similar measures are not taken for the competing modes (i.e. road), as well as for the overutilization of old rolling stock which will now be used disproportionately on lower freight volume routes. It might be relevant to consider combining this option with the subsidies approach to mitigate negative effects.

6.5.1. To what extent do you find 'TEN-T approach' appropriate to tackle the problem of rail freight noise? *

- ☐ Not appropriate
- ☐ Little appropriate
- ☐ Neutral
- ☐ Quite appropriate
- ☐ Very much appropriate
- ☐ Don't know

6.5.2. Should there be any differentiation in rail traffic restrictions between day and night? *

- ☐ Yes
- ☐ No
- ☐ Don't know / No view

6.5.3. When will it be technically and administratively feasible to introduce this approach? *

- ☐ It is possible already
- ☐ Within 1-3 years
- ☐ Within 3-6 years
- ☐ Within 6-10 years
- ☐ In 10 years or after
- ☐ It will never be possible
- ☐ Don't know / No view

6.5.4. Do you think that this policy measure could lead to negative consequences for rail operators, wagon keepers or other market players? *

- ☐ Yes
- ☐ No
- ☐ Don't know / No view



6.5.5. Please specify the probable extent of these consequences. (maximum 2000 characters)

6.5.6. Do you have further comments on the TEN-T approach?

We are interested in hearing any further comments as to the appropriateness of the policy measure and suggestions as to the implementation, e.g. whether the TEN-T lines cover broadly enough, whether it is practically possible to only apply restrictions to limited freight corridors and how monitoring can be done.

(maximum 2000 characters)

6.6. Density approach

This option is similar to the one examined above regarding the ways to achieve the noise reduction goal. It focuses mainly on the density of population and as such it is expected to have positive results in terms of quality of life and acceptance. It might have limited effects while being costly and complex to implement. Again funding will become an important issue. A number of possible variations concerning definition of the densely populated areas can be envisaged.

6.6.1. To what extent do you find 'density approach' appropriate to tackle the problem of rail freight noise? *

- ☐ Not appropriate
- ☐ Little appropriate
- ☐ Neutral
- ☐ Quite appropriate
- ☐ Very much appropriate
- ☐ Don't know

6.6.2. Should there be any differentiation in rail traffic restrictions between day and night? *

- ☐ Yes
- ☐ No
- ☐ Don't know / No view

6.6.3. When will it be technically and administratively feasible to introduce this approach?

- ☐ It is possible already
- ☐ Within 1-3 years
- ☐ Within 3-6 years
- ☐ Within 6-10 years
- ☐ In 10 years or after
- ☐ It will never be possible
- ☐ Don't know / No view

6.6.4. Do you think that this policy measure could lead to negative consequences for rail operators, wagon keepers or other market players? *

- ☐ Yes
- ☐ No
- ☐ Don't know / No view



6.6.5. Please specify the probable extent of these consequences. (maximum 2000 characters)

6.6.6. Do you have further comments on the density approach? We are interested in hearing any further comments as to the appropriateness of the policy measure and suggestions as to the implementation, e.g. how monitoring could be done or what the technical barriers are. (maximum 2000 characters)

6.7. Maintenance approach

This option is directed towards the second element in the wheel rail interface - rail. Setting up requirements for the rail roughness on the European Rail Network (or part of it) could lower noise not only for freight wagons but also for passenger trains. The infrastructure manager would play a key role in delivering this option. This option could however be contested on the grounds of the subsidiarity principle. This option could be combined with one or several of the other policy options deliver a substantial contribution.

6.7.1. To what extent do you find the maintenance approach appropriate to tackle the problem of rail freight noise? *

- ☐ Not appropriate
- ☐ Little appropriate
- ☐ Neutral
- ☐ Quite appropriate
- ☐ Very much appropriate
- ☐ Don't know

6.7.2. When will it be technically and administratively feasible to introduce this approach? *

- ☐ It is possible already
- ☐ Within 1-3 years
- ☐ Within 3-6 years
- ☐ Within 6-10 years
- ☐ In 10 years or after
- ☐ It will never be possible
- ☐ Don't know / No view

6.7.3. Do you think that this policy measure could lead to negative consequences for rail operators, wagon keepers or other market players? *

- ☐ Yes
- ☐ No
- ☐ Don't know / No view



6.7.4. Please specify the probable extent of these consequences. (maximum 2000 characters)

6.7.5. Do you have further comments on the maintenance approach? We are interested in hearing any further comments as to the appropriateness of the policy measure and suggestions as to the implementation (maximum 2000 characters)

6.8. Environmental health approach

This option assumes an equal treatment of all transport modes, therefore is regarded as "fair" as far as intermodal competition is concerned: it would introduce a general maximum level of transport-related noise exposure in the EU. This could have the highest and equally spread positive impacts and would not disproportionately burden railways. At the same time this option could have the most opposition from stakeholders and Member States, on a number of ground such as the high costs of implementation (which could be disproportionate between modes and countries), as well as technical and operational difficulties.

6.8.1. To what extent do you find environmental health approach appropriate to tackle the problem of rail freight noise? *

- ☐ Not appropriate
- ☐ Little appropriate
- ☐ Neutral
- ☐ Quite appropriate
- ☐ Very much appropriate
- ☐ Don't know

6.8.2. When will it be technically and administratively feasible to introduce this approach? *

- ☐ It is possible already
- ☐ Within 1-3 years
- ☐ Within 3-6 years
- ☐ Within 6-10 years
- ☐ In 10 years or after
- ☐ It will never be possible
- ☐ Don't know / No view

6.8.3. Do you think that this policy measure could lead to negative consequences for rail operators, wagon keepers or other market players? *

- ☐ Yes
- ☐ No
- ☐ Don't know / No view



6.8.4. Please specify the probable extent of these consequences. (maximum 2000 characters)

6.8.5. Do you have further comments on the environmental health approach? We are interested in hearing any further comments as to the appropriateness of the policy measure and suggestions as to the implementation, e.g. how monitoring can be done, what the technical barriers are, and who should carry the costs in this scenario?

(maximum 2000 characters)

6.8.6. Do you have suggestions for any other policy measures that you would deem appropriate in contributing to substantial reductions of rail freight noise, without decreasing the competitive position of rail transport?

(maximum 2000 characters)

7. Assessment of impacts of policy measures/options

In this section you are invited to assess the expected impact of the 8 policy options described in section 6. These include:

1. Competitiveness of the rail freight transport sector
2. Total administrative costs– for companies and for the state
3. Working conditions in the railway sector
4. General employment levels in your country
5. Government budgets
6. Exposure of public to rail noise
7. Functioning of the Internal Market
8. Ability of operators from 3rd countries (e.g. Switzerland and Russia) to maintain business in the EU.

The policy options are assessed as to their potential direct or indirect impacts compared to the situation today.

7.1. Please assess the possible impact of the policy options on the competitiveness of the rail freight transport sector in the EU?

- a: Very positive
- b: Positive
- c: Neutral
- d: Negative
- e: Very negative
- f: Don't know / No view

	a	b	c	d	e	f
7.1.1. Business as usual *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.1.2. Subsidies approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.1.3. NDTAC approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.1.4. TSI noise approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.1.5. TEN-T approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.1.6. Density approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.1.7. Maintenance approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.1.8. Environmental health approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7.2. Please provide the most important details regarding your assessments of impact (maximum 2000 characters)

7.3. Please assess the possible impact of the policy options on total administrative costs for companies and for the state.

- a: Very positive
- b: Positive
- c: Neutral
- d: Negative
- e: Very negative
- f: Don't know / No view

	a	b	c	d	e	f
7.3.1. Business as usual *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.3.2. Subsidies approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.3.3. NDTAC approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.3.4. TSI noise approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.3.5. TEN-T approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.3.6. Density approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.3.7. Maintenance approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.3.8. Environmental health approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7.4. Please provide the most important details regarding your assessments of impact (maximum 2000 characters)

7.5. Please assess the possible impact of the policy options on working conditions in the railway sector

- a: Very positive
- b: Positive
- c: Neutral
- d: Negative
- e: Very negative
- f: Don't know / No view

	a	b	c	d	e	f
7.5.1. Business as usual *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.5.2. Subsidies approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.5.3. NDTAC approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.5.4. TSI noise approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.5.5. TEN-T approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.5.6. Density approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.5.7. Maintenance approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.5.8. Environmental health approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7.6. Please provide the most important details regarding your assessments of impact (maximum 2000 characters)

7.7. Please assess the possible impact of the policy options on general employment levels in your country?

- a: Very positive
- b: Positive
- c: Neutral
- d: Negative
- e: Very negative
- f: Don't know / No view

	a	b	c	d	e	f
7.7.1. Business as usual *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.7.2. Subsidies approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.7.3. NDTAC approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.7.4. TSI noise approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.7.5. TEN-T approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.7.6. Density approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.7.7. Maintenance approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.7.8. Environmental health approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7.8. Please provide the most important details regarding your assessments of impact (maximum 2000 characters)

7.9. Please assess the possible impact of the policy options on government budgets

- a: Very positive
- b: Positive
- c: Neutral
- d: Negative
- e: Very negative
- f: Don't know / No view

	a	b	c	d	e	f
7.9.1. Business as usual *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.9.2. Subsidies approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.9.3. NDTAC approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.9.4. TSI noise approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.9.5. TEN-T approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.9.6. Density approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.9.7. Maintenance approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.9.8. Environmental health approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7.10. Please provide the most important details regarding your assessments of impact (maximum 2000 characters)

7.11. Please assess the possible impact of the policy options on the exposure of the public to rail noise

- a: Very positive
- b: Positive
- c: Neutral
- d: Negative
- e: Very negative
- f: No view / Don't know

	a	b	c	d	e	f
7.11.1. Business as usual *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.11.2. Subsidies approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.11.3. NDTAC approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.11.4. TSI noise approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.11.5. TEN-T approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.11.6. Density approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.11.7. Maintenance approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.11.8. Environmental health approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7.12. Please provide the most important details regarding your assessments of impact (maximum 2000 characters)

7.13. Please assess the possible impact of the policy options on the functioning of the Internal Market?

- a: Very positive
- b: Positive
- c: Neutral
- d: Negative
- e: Very negative
- f: Don't know / No view

	a	b	c	d	e	f
7.13.1. Business as usual *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.13.2. Subsidies approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.13.3. NDTAC approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.13.4. TSI noise approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.13.5. TEN-T approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.13.6. Density approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.13.7. Maintenance approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.13.8. Environmental health approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7.14. Please provide the most important details regarding your assessments of impact (maximum 2000 characters)

7.15. Please assess the possible impact of the policy options the ability of operators from 3rd countries (e.g. Switzerland and Russia) to maintain business in the EU?

- a: Very positive
- b: Positive
- c: Neutral
- d: Negative
- e: Very negative
- f: Don't know / No view

	a	b	c	d	e	f
7.15.1. Business as usual *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.15.2. Subsidies approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.15.3. NDTAC approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.15.4. TSI noise approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.15.5. TEN-T approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.15.6. Density approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.15.7. Maintenance approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
7.15.8. Environmental health approach *	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7.16. Please provide the most important details regarding your assessments of impact (maximum 2000 characters)

7.17. Please identify any mitigating measures which can be taken to reduce negative impacts of EU rail noise related intervention could have on the competitiveness of rail freight transport vis-à-vis road freight.

(maximum 2000 characters)

7.18. Please identify any impacts EU level rail noise related intervention could have specifically on SMEs and microenterprises (maximum 2000 characters)



7.19. Would you be prepared to pay slightly higher taxes (e.g. higher income tax) in order to finance measures to reduce rail freight noise in your area? *

- ☐ Yes
- ☐ No
- ☐ Don't know / No view

8. Final Comments

8.1. If you have any further observations or comments on how the noise of rail freight could be tackled, please specify these briefly: (maximum 2000 characters)