

Context

Traffic noise is the second-biggest environmental factor affecting Europeans' health after air pollution. Almost half of EU citizens are regularly exposed to road traffic noise over the level that the World Health Organisation (WHO) considers to pose a serious risk to health.¹ Noise pollution has been linked to 50,000 fatal heart attacks every year in Europe.² According to a recent Eurobarometer, close to half of us believe noise affects our health "to a large extent".³ The first implementation of vehicle noise standards was established in the early 1970s, the last reduction was in 1995. Unfortunately this has yielded only a small effect on the noise emission of actual traffic.

Impact of Commission, Parliament and Council positions

In September 2013, TNO developed a report intended to assist the European Council in finalising its common position. The report assesses the impact of the three available limit values set by the Commission, the Parliament and the Council. The table clearly indicates that the Commission proposal has the highest benefit-to-cost ratio (27) compared to 20 for the Parliament and 22 for Council. But the Council approach delays significant action until 2023 with the benefits not being fully realised for another 15 years after this.

	Commission	Parliament	Council
Overall noise reduction (compared to current situation)	3,4dB	1,9dB	2,6dB
Limit values reduction	-4dB (light vehicles) -3dB (heavy vehicles)	On average -2dB, but in some cases the limit increases (louder) than current standards ⁴	-4dB (light vehicles) -3dB (heavy vehicles)
Reduction timeframe (Starting from 2013)	Two-phase reduction Phase 1: 2 yrs (2015)* Phase 2: 3 yrs (2018)	One-phase reduction Phase 1: 6 yrs (2018)	Three-phase reduction Phase 1: 2 yrs (2016)* Phase 2: 6-8 yrs (2020-2022) Phase 3: 10-12 yrs (2024-2026)
Costs and benefits	Societal benefit: €190 billion	Societal benefit: €115 billion	Societal benefit: €123 billion
2013-2040 period for EU27	Cost to industry: €7 billion	Cost to industry: €5.8 billion	Cost to industry: € 5.7 billion
Number of people "highly annoyed" in comparison to current 54.9m Europeans	42.2m (-13 m)	46.1m (-9m)	43.9m (11m)

*Implementation of new test method, not real-world noise reduction limits.

Trilogue negotiations

The institutions started the trilogue negotiations on 1 October, establishing the broad institutional positions and the areas that would need the most work to establish a common position and the so-called negotiating red-lines. The second trilogue on 15 October brought about some early possibilities especially in the areas of labelling and consumer information, Acoustic Vehicle Alerting System (AVAS), tyre tread depth and road surface classification and quality, and limit values set out in Annex III. However, nothing so far has been agreed. As trilogue three approaches (5 November) the institutions face the reality of one last meeting to resolve most if not all the issues outlined in the first trilogue.

¹ WHO (2011): <http://www.euro.who.int/en/what-we-publish/abstracts/burden-of-disease-from-environmental-noise.-quantification-of-healthy-life-years-lost-in-europe>

² T&E Report (2008): <http://www.transportenvironment.org/publications/can-you-hear-us-why-it-finally-time-eu-tackle-problem-traffic-noise>

³ Eurobarometer survey (2010): http://ec.europa.eu/public_opinion/archives/ebs/ebs_347_en.pdf

⁴ The permissible sound level of road vehicles is part of the EU vehicle type approval legislation, as laid down in EU Directive 70/157/EEC and in the UN-ECE Regulation No 51

Main issues and recommendations

1. Limit Values Annex III

The biggest challenge surrounding the limit values and entry into force laid out in Annex III is trying to bring together the different approaches taken by the institutions. While the vehicle categories are by and large comparable, the time frame and final limit values pose a real difficulty. An acceptable **outcome, that would also reflect a compromise between the three institutions' would be to implement the new test (phase 1) within two years and that the significant reduction in limits for all cars (phase 3) is delayed for no more than six years after the Regulation's entry into force.** The outcome should also avoid the Council proposal to include an additional two or three-year delay for the buses (M3) and medium and large trucks (N2 and N3) – neither the Commission nor the Parliament have provided for this. The additional time frame is unacceptable for these three categories which reflect a large proportion of the overall fleet. An additional environmental improvement would be for the passenger cars (M1) and vans (N1) to be lowered by 1dB in phase 3 compared to the current Council position.

2. Article 4 and Article 6

The Council have proposed to delete Article 6 'Limit Values', and include a reference to the limit value table (Annex III) in Article 4 'General obligations of the Members States'. The Council proposal would make it illegal for a Member State to grant EU type approval to vehicles that did not adhere to the standards outlined in Annex III. However, Member States have to permit the sale, registration and entry into service of vehicles that do adhere to Annex III. This would mean that upgraded models (that are not require new type approved) that do not meet the standards set out in Annex III could still be sold in the EU market. This is a significant loophole. The removal of Article 6 creates additional ambiguity since it clearly states that sound levels shall not exceed the limits set out in Annex III. **This significant legal loophole must be rejected! It is a clear ruse from the Member States to allow upgraded models that do not require type approval to enter the market without adhering to any of the new standards.**

3. Tread Depth

Tyre tread depth has been a little debated issue; however this could lead to an increase in noise levels by 1dB for cars and up to 5dB for heavy-duty vehicles. Over the last 13 years all parties involved in the noise debate have agreed that tyres used in the test should be 'representative of the vehicle' and 'reflect real driving conditions' – the legal limit of 1.6mm (ie, worn tyres) is unrepresentative and does not reflect real driving conditions. It is important to note that the limit values established by the Commission for Annex III were established using tyres with at least 80% tread depth, based on a database of hundreds of vehicles. It is impossible to calculate the impact of changing the tyre in the test cycle on the limit values. **All three institutions need to reject this technical loophole. The impact assessment of limit values was undertaken by the Commission with 'at least 80%' and as such the test conditions should remain.**

4. Acoustic Vehicle Alerting System (AVAS)

The EU should remember that mandating AVAS specifically not abiding by the principle of technology neutrality. Increased safety for all road users should be the aim and outcome; a Pedestrian Protection System (PPS) is a superior and technology-neutral alternative. **Both AVAS and PPS should be supported to ensure the best technological development.**

5. Labelling and consumer information

The Parliament proposal on labelling and consumer information is a powerful tool for governments to promote quiet vehicles through public procurement. **The information necessary for the labels needs to be included in the type approval documents and made publically available.**

6. Road surface classification and quality

The Parliament proposal on road surface classification and quality could assist Member States when undertaking national road development strategy. **The Commission should develop an informative guide looking into technological road quality development, road classification and a best-practice guide with national information provided by the Member States.**

Further information

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