

EUROPEAN NETWORK OF THE HEADS OF ENVIRONMENT PROTECTION AGENCIES

European Commission
1049 Brussels,
Belgium

EPA Network secretariat
Kongens Nytorv 6
DK-1050
Copenhagen

13 October 2011

Dear Mr Kallas, Mr Potočnik and Mr Tajani,

As the European Network of Heads of Environment Protection Agencies (EPA Network), we write to you regarding the recently published EU draft proposal¹ to repeal Directive 70/157/EEC and its subsequent amendments. The draft proposal includes a new test protocol, new limit values, additional sound emission provisions (ASEP) and minimum noise for electric and electric-hybrid vehicles.

Road traffic noise is one of the most prevalent sources of nuisance and environmental health problems in the world. The recently published World Health Organisation² report showed that road traffic constitutes most of the burden of diseases from environmental noise. Therefore, the EPA Network highly appreciates the efforts of the European Commission to tighten the noise emission regulation for cars and trucks which will ultimately lead to a considerable reduction in noise exposure, as well as, assist in reducing the economic burden on those responsible for implementing noise abatement measures as part of the noise action plans in accordance with the Environmental Noise Directive, 2002/49/EC.

We have studied with great interest the impact assessment accompanying the proposal, led by DG Enterprise and Industry³, including the best available research which informed this study⁴, and have come to the conclusion that the evaluation has been carried out with sufficient scientific evidence. However, the range of policy options considered could be revisited to include more demanding options geared to guarantee more significant reductions in noise exposure from future road traffic.

¹ Proposal for a Regulation of the European Parliament and of the Council on the sound level of motor vehicles and of their exhaust systems 2011/XXXX (COD).

² Burden of disease from environmental noise. Quantification of healthy life years lost in Europe, WHO 2011.

³ Commission Staff Working Document, Accompanying document to Proposal for a Regulation relating to the permissible sound level and the exhaust system of motor vehicles Impact Assessment.

⁴ VENOLIVA – Vehicle Noise Limit Values – Comparison of two noise emission test methods – Final Report. TNO Report MON-RPT-2010-02103. March, 2011.

We also support the EU proposal for the provision to limit off-cycle emissions by complementing the new test protocol with an "Additional Sound Emission Provision" (ASEP). We therefore support the recommendations to develop the ASEP method further but with the objective of minimizing the annoyance and sleep disturbance of the affected population under a worst case scenario.

In conclusion, we see that the EU draft proposal has the potential to deliver real benefits for alleviating health impact problems caused by road traffic noise. Although we support the draft in general, the current proposal needs to be more demanding to guarantee this outcome. We strongly recommend putting in place now, legislation which includes an additional stage to the proposed option together with recommendations for developing provisions to curb off-cycle emissions, so that the failure of vehicle noise legislation that has occurred over the past 40 years does not still continue.

We look forward to hearing your response to this letter.

Yours sincerely

On behalf of the Interest Group on Noise Abatement of the EPA Network

Andrzej Jagusiewicz
Co-chair of EPA Network
Interest Group on Noise Abatement



Director, Chief Inspectorate of
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Vice Director, Federal Office for
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This letter is supported by a number of EPA Network members, namely the Austrian Environment Agency (UBA), the German Federal Environment Agency (UBA), the Environment Agency of Iceland, the Netherlands Environmental Assessment Agency (PBL), the Italian National Institute for Environmental Protection and Research (ISPRA), the Norwegian Climate and Pollution Agency, the Polish Chief Inspectorate of Environmental Protection (GIOS), the Swiss Federal Office for the Environment (FOEN), the Environment Agency of the Republic of Slovenia, the Swedish Environmental Protection Agency, The Czech Environmental Information Agency (CENIA), The Scottish Environment Protection Agency (SEPA) and the Irish Environmental Protection Agency.