



EUROPEAN
ENVIRONMENTAL
BUREAU



September 17, 2012

Dear Attaché,

Transport & Environment (T&E), the Health and Environment Alliance (HEAL), the European Environmental Bureau (EEB), and EUROCITIES, would like to draw your attention to the Competitiveness council working group meeting on **Tuesday 18th 2012** to discuss the **European Commission regulation proposal (2011/0409 COD) on the sound level of motor vehicles**.

Over the last forty years vehicle noise has increasingly impacted on the health and well-being of Europeans, while traffic noise standards have not been updated since the mid 1990s. Noise pollution is associated with around 50,000 fatal heart attacks every year and 250,000 cases of cardiovascular disease every year. It is the second biggest environmental health problem in Europe after air pollution, according to the World Health Organisation. Recent research proves that cutting traffic noise from vehicles would enable national governments, local authorities and society at large to enjoy benefits which would outweigh costs by a factor of more than thirty to one, saving around 89 billion Euros a year. This includes cutting health-related costs caused by noise, but also enabling local and national governments to avoid expensive measures such as installing noise barriers or insulating individual homes.

We understand that the co-decision procedure is focused on how much and how quickly noise levels for different types of vehicles should be tightened. However, we are concerned that the process may lead to a significant weakening of the proposal – to the detriment of over 200 million Europeans who are currently at risk from high levels of road traffic noise.

For these reasons, we ask you to reject proposals to further weaken the proposal:

- **No delay to entry into force.** The proposal from the European Commission would only apply to new types of vehicle from 20XX, and the vast majority of vehicles would not need any changes at all as they are already compliant with phase 1 limit values. Phase 2 would only enter into force after 7 years – the leadtime requested by the industry during the consultations on the regulation, which is more than sufficient. Proposals to delay this further, wait for agreement on UNECE Regulation 51, or add a further ‘transition period’ are not necessary and come at a high cost to public health and the budgets of local authorities. The proposed limits would only affect sales of new vehicles from 2019/20, so giving more than the 5-7 years lead time the industry claims is necessary for new models.
- **Take care with ‘moving the goalposts’ on vehicle classification.** In some cases, changing the classification is technically well-justified, but please be aware of proposals reclassifications intended to allow higher noise limits (and/or additional allowances) that were originally only intended for very specific vehicle types. Certain small-volume types of vehicles are responsible for a significant number of noise peaks;
- **Reject rounding down of measured results.** Proposing to round down measured results and allow vehicles in production to have more relaxed limits than tested vehicles;

T&E, HEAL, EEB, suggest a five point plan that would improve the original text and bring about savings worth 51 billion Euros costing only 3 billion. Please click [here](#) to view the position paper.

T&E, HEAL, EEB held an event in the European Parliament to launch [A Sound Investment Joint Declaration](#) in early June 2012, where cities, noise experts, politicians and civil society organisations came together in calling on the EU to increase the ambition level of European noise limits for new vehicles

We would welcome an opportunity to discuss these issues with you in person at your convenience.

Yours sincerely,

Greg Archer, Transport & Environment (T&E)
Anne Stauffer, Health and Environment Alliance (HEAL)
Louise Duprez, European Environmental Bureau (EEB)
Henk Wolfert, EUROCIITIES