

# Consultation on the Implementation Report of the Environmental Noise Directive (END) and on the EU Noise Policy

<b>Who are you?</b>	
In which capacity are you participating in this consultation? -single choice reply- (compulsory)	As an organisation
Please specify the type of your organisation: -single choice reply- (compulsory)	International body (other than EU institution)
Please give the name of the organisation which you represent: -open reply- (compulsory)	Council of Academies of Engineering and Technological Sciences, its Noise Control Technology Committee
Please give your name (Title, First Name, Last Name): -open reply- (compulsory)	Prof. Tor Kihlman, Chair
Please indicate the country where you reside: -single choice reply- (compulsory)	Sweden
<b>1 - Policy context</b>	
How important to your quality of life is the level of noise in your surroundings? -single choice reply- (optional)	
<b>Noise from neighbours</b> -single choice reply- (optional)	
<b>Noise from bars or restaurants or shops in your vicinity</b> -single choice reply- (optional)	
<b>Noise from motor vehicles</b> -single choice reply- (optional)	
<b>Noise from aircrafts</b> -single choice reply- (optional)	
<b>Noise from trains</b> -single choice reply- (optional)	
<b>Noise from industrial installations</b> -single choice reply- (optional)	
<b>Other</b> -single choice reply- (optional)	
If you chose "other", please specify: -open reply- (optional)	
What do you think of the level of noise pollution near your home? -single choice	

reply-(optional)	
How much do you know about the environmental noise legislation in your country? -single choice reply-(optional)	Very much
<b>EU legislation on noise includes directives that provide a framework for monitoring and where necessary reducing environmental noise and directives that control the level of noise emissions from specific sources.</b> How much do you know about the relevant EU noise legislation (which is an important basis for national legislation)? -single choice reply-(optional)	Very much
<b>2 - Strategy/approach of the environmental noise directive (END)</b>	
<b>The use of noise mapping, the preparation of action plans and the reporting to the public and to the EU:</b> -single choice reply-(optional)	Moderately
<b>Noise limit values:</b> -single choice reply-(optional)	Much
If you do not consider the current approach to limit values appropriate, which of the following alternatives would in your view be best: -single choice reply-(optional)	3) EU limit value (if the value is exceeded in any location, action must be taken and the value must be attained)
If you wish to outline an alternative position or expand on the issue please do so. -open reply-(optional)	
Common limit values should be based upon criteria for health, sleep disturbance and annoyance. The limit values to be based on health recommendations provided by WHO. Vulnerable groups and sensitive areas must be taken into account.	
<b>The END aims at providing a basis for developing (separate) EU measures to reduce noise emitted by major sources, in particular road and rail vehicles and associated infrastructure, aircraft, outdoor and industrial equipment and mobile machinery.</b> Do you think that the END has provided a good basis for developing source-based regulatory measures? -single choice reply-(optional)	No
Please explain your reply in both cases; particularly if no, please suggest how the END could	

serve this aim in a better manner? -open reply-(optional)

The link between END and emission limits of the major sources is much too weak. With present emission limits, specifically on road traffic noise sources, planning is not a sufficient tool to avoid serious health effects. There is a gap of at least 10 dB between what sources are allowed to emit and the possibilities by best planning to secure healthy environments for all citizens. The situation is similar for other transportation means. The END should therefore include objectives and instruments for the reduction of noise from all sources and in particular transport. One of the main objectives of the END is "to provide a basis for developing Community measures to reduce noise emitted by the major sources" but there is nothing concrete in the END regarding how to reduce these specific noise sources. The need for the Commission to develop a comprehensive source policy, also requested by the European Parliament, is an absolute priority. These source policies must be based upon immission criteria. Present methods to set noise limits for road vehicles is far from effective in reducing the immissions. The immissions in the cities are determined by the total acoustic power radiated at different frequencies by the real traffic which is not sufficiently close related to present limits based on the maximum dBA level at 7.5 m in only two modes of operation. Separation between power train properties, tyre properties and road surfaces properties is needed in an effective syst

**The END aims at protecting areas within and outside cities where the noise quality is good.**

Are you aware of any quiet areas in the vicinity of your home?

-single choice reply-(optional)

### 3 - Assessment/reporting

Are you aware of any noise mapping in your city, region or country?

-single choice reply-(optional)

If yes, do you consider that the results of maps accurately reflect the reality of noise exposure in your city or region?

-single choice reply-(optional)

**In 2008, Commission efforts started on developing harmonized methods for assessing noise exposure. A project entitled "CNOSSOS-EU" (Common Noise Assessment Methods in Europe) led by DG Environment and DG Joint Research Centre provided the technical basis for preparing an agreed method to be used by MS in future rounds of noise mapping.**

Yes

**Are you aware of CNOSSOS-EU?**

-single choice reply-(optional)

If yes, and based on your current understanding, do you think that the CNOSSOS-EU methodological framework will improve comparability

Moderately

and consistency in strategic noise mapping in the EU? -single choice reply-

(optional)

Do you think that the 5 years cycle in between the noise mapping rounds is appropriate?

-single choice reply-(optional)

Please explain your reply: -open reply-(optional)

Whereas CNOSSOS-EU has taken advantage of the recent development in acoustic source strength modelling (from projects Harmonoise and Imagine), the propagation modelling is very simplified (according to the French NMPB model, which predates the Harmonoise project). For instance, the ground effect is simplified into a single "hard-to-soft" parameter, assumed the same for all frequencies. A very limited description is made also of the geometry in combination with acoustically varying material properties (e.g. grass/asphalt) whereby e.g. steep road cuttings with absorptive surfaces cannot be properly modelled. Due to these simplifications, the positive effect of many realistic and potentially attractive noise abatement methods cannot be predicted, and thereby risk to never be constructed. If actual improvements, by the use of novel abatement methods, are not visible in the strategic noise mapping results, the model is not coherent. There is also less incitement for putting into place noise abatements which are not visible in the noise mapping. Hence also the objective of the END to reduce environmental noise levels is put at risk.

Do you consider the period of one year between making the noise maps and drawing up the action plans is sufficient? -single choice reply-(optional)

Please explain your reply: -open reply-(optional)

When this process has been started, the revision could be done in one step, i.e. action plans should be presented together with the noise maps. This makes it easier for the public to have an opinion about the noise issue.

**The European Environment Agency's tool Reportnet has been developed since 2000. Reportnet was initially used for reporting environmental data to the European Environment Agency, but now also hosts some of DG Environment's reporting tasks, including those related to the Environmental Noise Directive and its associated compliance checks.**

Yes

Do you support the idea to make Reportnet the mandatory reporting tool to submit information to the Commission pursuant to the END?

-single choice reply-(optional)

Please explain your reply: -open reply-(optional)

Any action that would streamline the reporting process should be welcomed. This facilitates comparison across areas and border.

**According to the latest WHO recommendations, adverse health effects due to night time noise**

Yes

exposure can commence to occur at 40 dB  
Lnight. The current reporting neglects the fact that there is a considerable share of EU population exposed to noise pollution at levels lower than 50 dB which are still likely to cause harmful effects on health. Though, the current noise assessment methods do not allow assessing accurately exposure to such low levels.

Would it result in any benefit to lower the reporting thresholds according to WHO recommendations?

-single choice reply-(optional)

Please explain your reply: -open reply-(optional)

The number of people exposed to intermediate noise levels is very high. According to WHO data harmful effects (especially due to disturbance of sleep) can be observed for levels from about 40 dB and up. This large group of noise exposed people must not be neglected, but the prediction models fail to accurately compute low exposure levels. As a compromise it is suggested to lower the noise mapping starting point to 45 dB, with a clear goal to lower it even further when sufficiently accurate prediction models have been developed

**A number of possible technical improvements to the END were identified including clarifications of the definitions and obligations related to agglomerations, quiet areas, major roads, major railways, major airports, industrial noise and action plans.**

Yes

Do you think that a revision of these definitions or unclear provisions needs to be done?

-single choice reply-(optional)

If yes, in what time frame? -single choice reply-(optional)

One year

If you wish, you can give your view in your own words here: -open reply-(optional)

Agglomeration has been interpreted rather differently also between such agglomerations in the same country. A clarification of what is meant by "quiet areas" is important. A definition in terms of noise levels only may not be sufficient. Other parameters should also be considered. The definition of action plans shall make it mandatory to compare the expected results in terms of noise levels when the action plan has been fulfilled with WHO recommended levels.

Could the INSPIRE Directive (OJ L 108/1, 25.04.2007. p1) be used as a basis when modifying the data needed of END?

No opinion

-single choice reply-(optional)

If you wish, you can give your view in your own words here: -open reply-(optional)

## 4 - Noise management in Member States

Do you agree that the END has had sufficient impact in your country/region to reduce noise levels so far?

-single choice reply-(optional)

Totally disagree

Do you think that the EU should have more influence regarding measures within Member States? -single choice reply-

(optional)

If yes, please indicate in what way the EU should take a more active role: -open reply-(optional)

It is necessary to harmonize requirements/recommendations relating to emission and immission levels. Desirable health-based immission levels cannot be met with today's noise sources. Transportation noise, especially road traffic noise, accounts for the bulk of the annoyance and serious health effects. Stricter emission requirements for motor vehicles are therefore absolutely urgent. The present proposal for stricter emission limits now under consideration in the Parliament will have a marginal effect. It must be absolutely clear that present standard, incl. the proposed method called (B), is inadequate and not effective, for the legislation of road vehicle noise emissions. Separation in the legislation between requirements on the vehicles (the power train), the tyres and the road surfaces is necessary. Revised and partly new standards based on emitted acoustic power under different traffic conditions is necessary for an effective system.

**Many aspects of the Directive were not prescribed in detail or leave room for interpretation. Many Member States suggested that these issues could be addressed through dedicated action assisting in the implementation and compliance at EU level, such as the development of guidance documents, the information exchange of best practices or the organisation for specific workshops and training courses.**

Are you aware of any guidance documents, internet pages or workshops related to noise mapping or action planning? If yes please specify. -open reply-(optional)

WWW.LJUDLANDSKAP.ACOUSTICS.NU

Do you think there are synergies in air quality and noise management that should be better exploited in EU policy?

-single choice reply-(optional)

Yes

If yes, please indicate how: -open reply-(optional)

There is a wide range of society's processes/activities in which noise problems are integrated. There are win/win situations between noise policy and other emissions including climate gases. Lower noise emissions facilitates healthy quiet compact cities. Compact cities save land use and fuel, have typical shorter travelling distances, lower speeds are possible. Barrier effects can be reduced. Walking and bicycling can be promoted. There are conflicts. Demands upon reduced fuel consumption and cleaner exhaust gases from road vehicles and jet engines make the noise emission problems tougher. Traffic safety demands on roads may collide with ways to reduce the noise

emissions. Sometimes noise is called a local problem which, however, cannot be solved locally if not the source levels get reduced which is an area for international agreements. Economic suboptimization lead to unfortunate end results. To get a really quieter world demands that planners, builders, industries, etc. all do more. Speed policy is an important area.

## 5 - Public information and dissemination

...in your neighbourhood? -single choice reply-  
(optional)

...in your region? -single choice reply-(optional)

...in the EU? -single choice reply-(optional)

Sufficient

Has the population been consulted by the relevant authorities in your country concerning noise mapping and action planning? -single choice reply-(optional)

Do you consider that products including private vehicles and outdoor equipment should be labelled according to their noise emission level, so that consumers are appropriately informed? -single choice reply-(optional)

Yes

*Do you think that dwellings in residential areas should have a noise label, similar to the energy label?* -single choice reply-(optional)

Yes

## 6 - Governance

How effective has the EU noise legislation (END) been as a driver for national, regional and local authorities to take action for reducing noise exposure where needed? -single choice reply-  
(optional)

Moderately effective

## 7 - Your most important issues

If you have a view on improvements of the directive and that you would like to be considered in the review, please describe it in your own words in the text box below. Please express your view

concisely, in less than 300 words and preferably in English, German or French.

*You may wish to comment on:*

- *Overall approach of the EU noise policy*
- *Consistency with other policy fields*
- *The concept of guideline, threshold, target, limit values*
- *The concept of exposure reduction targets*
- *Link to the source legislations (e.g.: noise from cars or trains)*
- *Reporting*
- *Guidance on action planning and quiet areas*
- *The added value of the CNOSSOS-EU methodological framework over existing noise assessment methodologies used in EU Member States*
- *Differences between Member States in taking action where noise reduction is needed*
- *Public information*
- *Public participation (e.g.: on development of noise action plans)*

If you wish you can give your view in your own words here: -open reply-(optional)

The (END) has the ambitious objectives but has had negligible effect upon the noise situation in EU. The health effects of noise need to be stressed. Almost nothing has been done to point 2 in the objectives "... to reduce noise emitted by the major sources..." The gap between what sources are allowed to emit and the possibilities by best planning to secure healthy environments is at least 10 dB. An effective policy for road traffic noise to improve the environment for the EU citizens demands methods that separate the requirements on the vehicles (the power trains), the tyres and the road surfaces. Technology driving demands are needed for all these parts taking the long lead times into account. This means ambitious and firm limits set early but allowing reasonable lead times. The END should be developed into a comprehensive plan to cut noise from all major sources, in particular from all modes of transportation. The health effects of noise from the traffic should be taken as serious as the health effects of traffic accidents.

## 8 - Your own involvement

As an individual, what are you prepared to do to reduce noise exposure?

Please tick as appropriate:

-multiple choices reply-(optional)