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IRU position on VEHICLE NOISE

Unanimously adopted by the by the IRU EU Goods Transport Liaison Committee (CLTM) in Brussels on 1 March 2012 and by the IRU Passenger Transport Council (CTP) in Geneva on 26 April 2012

IRU Position on the European Commission proposal on the sound level of motor vehicles.

IRU Position

I. ANALYSIS

In December 2011, the European Commission tabled a new proposal COM(2011)856 to amend the type-approval of motor vehicles with regard to their noise emissions, to reduce the negative impact of noise exposure for European citizens and to safeguard the internal market for motor vehicles sales and use.

Over the last few decades the road transport industry has already made huge investments to significantly reduce its noise impact, to the point that 25 modern commercial vehicles generate the same noise level as only 1 built before 1980. Stricter vehicle standards will not be sufficient to ensure a further substantial, cost effective reduction in vehicle noise emissions at source.

New low noise vehicles will undoubtedly be more expensive; these higher costs cannot be automatically passed on. Incentives to use low noise vehicles could encourage commercial vehicle operators to invest in such vehicles. Unfortunately, the new proposal remains vague on possible price increases and does not mention any incentives which could accelerate the market uptake of new low noise vehicles. In addition, meeting the new requirements may be more complex for some categories of commercial vehicles such as buses and coaches and may come at a higher cost.

Solutions to reduce noise of commercial vehicles, such as the better encasing of the engine, will increase the unladen weight of the vehicle and thus reduce its operational efficiency. Furthermore, a better encasing of the engine could reduce fire detection capability in the engine compartment.

The new proposal only looks at engine type approval, not at other noise contributing aspects such as tyres which have their own rules. An integrated approach is needed, including all vehicle-related measures aimed at reducing noise in one set of rules to improve legal clarity and transparency.

Commercial road transport vehicles only represent about 20% of the overall transport noise emissions whereas 60% are attributed to other vehicles including motor cycles and agricultural and forestry tractors; two vehicle categories which are not considered by the new proposal but are increasingly used on the public road network including in urban areas.

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In addition, the noise generated by traffic and vehicles can have many sources: type-road noise, tyre-road noise, power train noise, roll/wind resistance at higher speed, exhaust noise, engine noise, fan noise, air intake noise, air drag noise and noise from various pieces of equipment. “Individual noise” and “collective noise” must also be separated: a single vehicle is not noisy compared to several vehicles on different road surfaces with many sets of traffic lights requiring frequent braking and acceleration. Road transport noise cannot, therefore, be optimally reduced by looking at the vehicle alone, without taking into account other elements such as infrastructure.

Road transport is also not the only mode causing noise. Air, rail and other fixed track transport such as tramways are also considered as substantial causes of excessive transport noise. Airlines face strict rules in relation to noise. But until now, no concrete European measures have been introduced to reduce rail and tramway noise, despite increasing claims that this is a serious problem.

II. IRU POSITION

The IRU is prepared to support the new noise reduction measures, provided that investments in low noise vehicles allow commercial vehicle operators to reduce costs and increase operational efficiency. Reducing vehicle noise requires an integrated approach not only looking at engine type approval but also considering other relevant vehicle parts such as tyres.

Transport noise, in general, and road transport noise, in particular, can only be optimally reduced if a number of complementary measures are introduced:

- Required investments, opportunities arising from them and legal certainty should be guaranteed for a reasonable period of time in order to allow return on investments for road transport operators
- Incentives such as allowing reduced rates for using infrastructure and external cost charges are granted to professional road transport operators to accelerate the market take-up of low noise vehicles;
- Infrastructure-related measures are taken to optimise the performance of low noise vehicles such as the wider use of low-noise pavements and the installation of sound barriers.
- Concrete measures are undertaken to reduce noise of all vehicles used on the road and to internalise noise externalities in all transport modes.