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**B2 Unit - Trans-European**  
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**1049 Brussels**

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Concern : public consultation on the extension of the major Trans-European Transport Network to the neighbouring countries and regions.

Dear Sirs,

Referring to your kind invitation to express our opinion concerning the new Trans-European Network concept, you will find hereafter a few comments about your last report on the subject

### ***The Problem***

Highways and major roads due to their success have led finally to a noisy and chemically aggressive network. The opportunity to solve this problem through a dramatic shift to a high velocity railway network operating day (passengers transport) and night (freight transport) has appeared to many as an adequate socio-economic answer. Although this proposal has immediately encountered a real media success, the technical drawbacks associated with such a shift should not be ignored. As the various Working Groups (WG) launched by your Directorate General pointed it out: noise is the major problem to solve in order to consider railways as a suitable answer for a valuable substitute to the nearly saturated road system

### ***The position adopted by the Commission***

As we mentioned it previously, the Transport Directorate-General, since a few years, has organized several WG in order to analyse the problem and elaborate a suitable strategy from the duly identified chief parameters involved. Several technico-political reports have been published; they form the backbone of the new railway network strategy.

A thorough reading of those reports reveals a quite satisfactory problem analysis: noise is identified as the dominating parameter for high velocity trains as well as for freight wagons and both rails and vehicles contribute largely to it. Nonetheless the leading actions proposed by the WG are puzzling as they give the highest priority to:

- the replacement of the old brake blocs of the freight vehicles by new composite one. This is in fact a quite straightforward proposal, recognized everywhere.
- the reduction of rail noise by maintenance grinding programs
- reinforced house insulation along the tracks
- railway noise standard measurement accepted by the operators

All those actions being financially supported by European funds and money with no self supported research, the WG wishing neither public information nor public participation !

It is now clear that those WG due to their composition and their subsequent biased choices reflect all what we have tried to modify of the old 19<sup>th</sup> century national monopolistic societies: a system of servant-Engineers wishing to pursue their activity with the less environmental and societal constraints.

Moreover the total absence of environmental association as well as medical corpse and Scientists representatives in the WG have rendered their conclusions outmost partial and non transparent. The use of European funds money for such a costly unsatisfactory solution is consequently unacceptable.

### *Conclusion*

The idea to expand the European railway network in order to challenge and replace the nowadays heavily polluted road system is quite valuable. However the priority actions proposed by ill balanced WG are not satisfactory and will lead to a costly shift from a saturated noise system to a noisy day and night railway one. It is therefore urgent:

- to readjust the WG composition in order to inject into them the right environmental, health and societal balance they need.
- to use those restored WG to follow all the actions that will be recommended as it should be done for any decent sustained developed project

Hoping that those comments will retain your attention, we are, Dear Sirs, to your disposal to participate to any positive technical and societal debate in order to bring the necessary key-parameters into an adequate European railway network strategy.

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