



EUROCITIES response to the report on the implementation of the Environmental Noise Directive (END)

July 2017

With most of the world population living in urban areas, cities are key players in reducing the number of people affected by environmental noise. We believe that future actions at EU level should include:

- an environmental noise directive (END) with a target oriented approach, supported by more ambitious measures tackling noise reduction at source
- more efficient reporting and monitoring mechanisms
- an increase in the number of people covered by the END
- clearer language used by practitioners, so to make it more accessible to citizens
- more EU funding and financing dedicated to noise mitigation

Background

According to the World Health Organisation (WHO), noise pollution is responsible for a disease burden that is second only to air pollution¹, as more than 100 million people in Europe are affected by noise from traffic². The 7th Environment Action Programme recognises that Europeans living in urban areas are the most exposed to harmful levels of noise. City authorities, which develop integrated urban planning policy, are central to reducing the number of people negatively affected by environmental noise.

The END has been a key legislative instrument for protecting Europeans and mitigating excessive noise pollution caused by sources such as roads, railways, aircraft and industrial equipment. However, despite the production of noise maps and action plans the numbers of people exposed to high levels of noise in cities has increased. While we appreciate most of the conclusions and proposals in the report on the implementation of the END, we believe that citizens would benefit from a stronger END³ to pave the way towards a more ambitious EU noise policy. We consider that the future work on noise at EU level should take into consideration the following aspects:

¹ World Health Organisation press release and report available at http://www.euro.who.int/__data/assets/pdf_file/0008/136466/Burden_of_disease.pdf

² European Environment Agency (2017) Urban environment – European Environment Agency. Available from: <http://www.eea.europa.eu/themes/urban>

³ On the Implementation of the Environmental Noise Directive in accordance with Article 11 of Directive 2002/49/EC <http://bit.ly/2riOKDK>

Effective implementation

The report on the implementation of the END acknowledges that the directive is not yet fully effective. Implementation in member states has been significantly delayed, mainly due to the lack of political priority given to noise at the different levels of government. There is no clear driving force to compel competent bodies to reduce noise levels, meaning that achievements in the reduction of environmental noise and noise at the source are still challenging. To improve this situation, we recommend:

- **a target oriented approach**

City authorities would benefit from an END that incorporates a more target-oriented approach with a clear time frame. Setting binding targets at the EU level for noise at source as well as noise along and around major noise sources would encourage policy-makers to take noise mitigation seriously and would allow member states to still have flexibility in defining of their noise reduction objectives.

If this approach does not bring the results expected, the Commission should evaluate the possibility of setting targets on the reduction of the number of people affected at member state level.

- **tackling noise reduction at source**

Tackling noise at source level is essential and is more cost effective than local measures, such as quiet road pavement or noise barriers. However, regulations on noise sources are not strict enough and we support stronger measures to encourage quieter road, rail and air transportation. The requirements derived from policies at source would then be more balanced comparing to the obligations that END imposes on city authorities. As we are already working towards an integrated approach on noise, we welcome the plan to combine mitigation actions across noise, air quality, climate/energy, mobility and health domains.

- **involving city authorities in the decision-making process**

Experience shows that local actions alone are rarely sufficient to tackle noise issues. We are convinced that effectiveness can only be improved by close cooperation between the Commission, member states, regions and cities, as well as the private sector and the citizens. The initiative of the Commission to engage in a closer cooperation with external stakeholders is appreciated and we believe that city representatives should be involved in the Commission Noise Expert Group.

Efficient monitoring & reporting

The implementation of the END at member state level is very problematic. City authorities are struggling to comply with the obligations set by the END, due to inefficient design of the monitoring and reporting mechanisms. We recommend:

- **extension of timeframe between noise maps and action plan publication to 2 years**

We welcome the recognition that a one year timeframe between the finalisation of noise maps and the adoption of action plans is not realistic. We ask that the timeframe is extended to two years, considering the future entry into force of CNOSSOS methodology in 2022, the increase in newcomer agglomerations due to the lowering of the threshold to 100,000 inhabitants, and the binding Strategic Environmental Assessments (SEA) that some member states have imposed on their competent bodies.

Stricter rules on the revision of the noise maps and actions plans, which will ensure an effective re-evaluation of the noise situation every five years, is also a positive development.

- **standardisation of calculation methods**

Methodologies for calculating the number of people that are exposed to high noise levels differs between the member states. These methods should be standardised taking into consideration, where possible, the data available at EUROSTAT.

The new CNOSSOS methodology is badly needed. However, its implementation does not imply 100% comparability between member states or cities. Comparability of the data pre- and post-CNOSSOS will also be difficult. These comparability issues can undermine city authorities' capacity to extract evidence on improvements made. Therefore, we would welcome the expert group on noise to develop guidance and support cities in improving the quality of data and a benchmark for propagation data, which would encourage political support for noise reduction.

Considering the urgent need for data collection on noise pollution, any effort the Commission can undertake to gather new data on noise levels and noise effects in cities is welcome. It would also be helpful, if feasible, to harmonise data available from road rail and air transport in a single reference figure.

Inclusiveness

The END implementation report emphasises the positive role the directive has in safeguarding citizens' health. To maximise its impact and the number of people covered by the END, we recommend:

- **widening the scope of noise maps**

City authorities are receiving an increasing number of complaints related to low-frequency noise. Giving us the opportunity to highlight, if necessary, low-frequency noise spots on

noise maps can increase awareness and create the basis improvement in subsequent action plans.

In addition, industrial noise outside agglomerations and military sites with a certain capacity and size should be subject to noise mapping to get a more comprehensive overview of people exposed to noise in Europe.

Clarity & accessibility

According to the END, information on environmental noise and its effects should be available to the public. In addition, the END states that the information should be clear, comprehensible and accessible. While the information on noise was often made available through the publication of the noise maps and action plans, the effects of noise were barely mentioned in the reports. Moreover, we believe that information to citizens does not always meet the expectations/requirements specified in the END. Indeed, the technical language of noise maps and action plans has undermined the capacity of the public to understand the information provided. We recommend:

- **ensuring public awareness and accessibility by providing clearer definitions and information**

The definitions of quiet areas, harmful effects and agglomerations are not clear as cities are encountering difficulties in the identification of quiet urban areas. The competent body would benefit from a good practice guidelines from the Commission, with a simplified method based on the QUADMAP⁴ methodology and EEA guidelines.

Information from authorities usually contains a language that is not fully understandable by the public. A simplification of the technical terms (e.g. LDEN & LNIGHT), showing the correlation between noise exposure and health problems, would increase the accessibility of the directive and would help stakeholders understand the importance of noise reduction.

Funding & financing

Considering the impact that noise has on citizens' health, city authorities would welcome the increase of available finance for noise mitigation across EU funding programmes including Horizon 2020, the European structural and investment funds as well as the European strategic investment fund. Access to funding must be simplified to fully support cities' actions on noise mitigation measures.

⁴ <http://www.quadmap.eu/>