

## **Reply to public consultation**

Brussels, 1 February 2021

# **The EU Action Plan “Towards a Zero Pollution Ambition for air, water and soil”**

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# Accompanying statement in reply to the public consultation on the EU Action Plan “Towards a Zero Pollution Ambition for air, water and soil”

CER supports EU’s zero-pollution ambition that should guide actions on air, water, noise pollution at the national level according to the polluter-pays principle. The Zero Pollution Action Plan should enable EU transport to be cleaner by progressing with the internalisation of external costs.

All these issues are linked to the UN Sustainable Development Goals and must find its place in the new European Environmental Action Programme. EU level strategies are pivotal to help Member States, which are the most appropriate level of government to deal with the pollution according to their specificities, in their actions. The European Commission together with institutions like the European Environmental Agency should make sure to monitor pollution levels (based on data collection and processing) and to produce methodologies for determining the amount of pollutants that limits could be imposed at the national level. Finally, the EU level Strategy should provide a forum for Member States to share their experience and approach with a view of recommending the most effective solutions to minimise pollution.

Railway sector is taking a lot of actions to become zero-pollution mode of transport.

## ▪ **Energy efficiency**

Railway companies implement various measures, ranging from ecodriving, and driver advisory systems to automatic train operations for efficient operations. International Union of Railways (UIC) SFERA is a good example of UIC members proposing an innovative standard for efficient trains control and driving advice as a step towards automatic operations. Railway companies pay particular attention to optimising load factor to further reduce their emissions per passenger-km and tonne-km even during and after the COVID-19 pandemic.

## ▪ **Use of renewable energies**

The high reliance of rail operations on electricity allows avoiding emitting tonnes of exhaust pollutants. This complement’s rail’s best in class performance of climate impacts. However, the sector is aware of the pollution that originates from the electricity that is produced with fossil fuel power plants. While this pollution is less than combustion engines railway sector promote electricity from renewable energy sources. This is why many railways also strive to purchase “green” electricity and arrange power purchase agreement for solar panels fields on their land. See here CER fact sheet on climate and energy.

## ▪ **Efforts for reducing air pollution and noise**

CER-UIC Members are striving to phase out the use of diesel traction, thus actively working to eliminate direct exhaust particulate matter and nitrogen oxide emissions from the locomotives, including work trains. Noise reduction remains a top priority for the sector (see here UIC activities on noise and vibrations). Different levels of technology maturity oppose a great challenge for rolling stock renewal that is a long-term investment due to a good lifespan. Railway sector has already shared its views on

alternative fuels and powertrains and taking active part in the green hydrogen debate in Europe. Railways are calling for further studies at the EU level or studying on their own for best short- and middle-term replacement solutions.

- **Avoid the use of chemicals wherever possible and minimise environmental impacts and risks to occupational safety and human health** (i.e. conventional chemical herbicides, creosote etc.)

Under the guidance of UIC (see an overview [here](#)), railway companies are working together to come up with strategy, guidance and leadership for addressing vegetation management, biodiversity and soil quality. Railway managers should be further encouraged to work with universities, institutions and industry to extensively test such environmentally friendly alternative solutions to substitute chemicals without hampering competitiveness of the whole rail system. More research is required to assess the impact of creosoted wooden sleepers on ballasts, soils, groundwater and surface water, air and soil.

- **Waste disposal**

Reducing waste and circular economy projects to increase recycling are ongoing in the railway sector. Recycling bins are placed for customers and measures are taken to reduce plastic waste. Employees are trained. Disposal procedures for products with risk characteristics or concerns should be elaborated in more detail and all efforts should be harmonized within the EU. Digital tools should control the system for these risky or potentially risky wastes which should not be reused. They must be properly disposed after end-of-life treatment.

Railway sector should note that there is a risk of rapid transition to unproven alternative solutions. The environmental footprint of alternative solutions should be carefully assessed for the production and installation processes before implementing them in the railway system. Here socio-economic and environmental analysis must be performed in order to draw holistic strategic plans to improve the overall environmental performance of the railways without threatening the commercial competitiveness of the sector.

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#### **About CER**

The Community of European Railway and Infrastructure Companies (CER) brings together railway undertakings, their national associations as well as infrastructure managers and vehicle leasing companies. The membership is made up of long-established bodies, new entrants and both private and public enterprises, representing 71% of the rail network length, 76% of the rail freight business and about 92% of rail passenger operations in EU, EFTA and EU accession countries. CER represents the interests of its members towards EU policy makers and transport stakeholders, advocating rail as the backbone of a competitive and sustainable transport system in Europe. For more information, visit [www.cer.be](http://www.cer.be) or follow [@CER\\_railways](https://twitter.com/CER_railways) on Twitter.

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