

Submission:

ADELAIDE RAIL FREIGHT MOVEMENTS STUDY

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I make this submission on the Adelaide Rail Freight Movements Study as an individual with no commercial association to any rail freight operations or alliance with any lobby group with a commitment to re-directing the current freight rail route.

An objective analysis of the Discussion Paper as presented appeared to make a compelling case for option 3 based on the best overall balance satisfying the stated key factors

- Operating performance
- Community amenity
- Future demands
- Project costs

However the Discussion Paper appeared to be inadequate in a number of areas that seemed to me to be disconcerting given the importance and magnitude of the issue under discussion.

There appeared to be a complete lack of relevant cost analysis on the options proposed in the Discussion Paper. An issue such as this is going to be almost completely decided on an operating cost basis and the paper provided no serious data in this respect. The data provided in the Study's Table 2 provide a number of factors all based around details and factors on the alternate proposed routes but nothing on the real impact to freight line operators. While it is essential to compare issues between the various routes such as travel times, load carrying capacities, operating maintenance ect., in the end it is going to be the cost/metric tonne to the freight operators that decides whether the option will be taken up in preference to road freight. Table 2 appears to be presented in this Study as the definitive comparison factors but what is presented there will mean nothing until the freight operators analyse the options and what it will cost them to run on each option.

The Study does not raise the issue of potential cost recovery from freight operators (direct or indirect) for any of these projects, and what that might mean to the operators use of the line. As part of a serious review of all options it must be considered that if the Government decided to look to recoup some of their capital costs of the chosen option (either directly or indirectly) then this would have an enormous impact on the eventual use of a new line over the choice of road transport. With the Study's estimated capital costs of the 5 options varying between \$0.7B and \$2.4B there could be another huge factor for potential rail operators to consider if there was to be some additional; freight line charges to recoup some capital costs. It would appear to me to be negligent to not consider this issue as you could end with the scenario of a new line set up but potential operators not utilizing in because eventual operator costs have ended up making the road alternative more viable.

The Study appeared to pay little attention to the relative time for each option to be completed and hence the full financial and operating costs associated with each option's implementation. There would, as an example, clearly be an enormous difference in the time to implement option 1 compared to option 2 (probably in terms of a number of years) and yet there is no serious analysis

comparing the financial and operating costs associated with implementation. Table 2 presents a simplistic comparison of all options without reference to vital implementation factors.

The Study does not appear to raise the issue of potential freight collection along each of the proposed route options. Section 4.3 (Assessment of the options) addresses a number of the issues for each option but does not raise the issue of what goods are currently collected along the existing rail route and the potential impact of a new route. Options 2,3 and 4 would all alter the current freight route so each of these would have some current freight not being accessible to the line but also each option may have some new potential freight being accessible (for example options 2 and 3 may be able to benefit the Barossa Valley for freight transport to the eastern states). These factors would have significant impacts on the costs and viabilities of each option (If, for example, the current route were discontinued then while new freight could be collected on the new route, adding to it's viability, there would also be existing freight collected that could no longer be transported by rail)

Lastly, the Study did not raise the issue in discussion of Options 2, 3 and 4 on the impact of the existing freight line through the Adelaide Hills if any of these options were implemented. Although it may be considered a side issue to freight, there will still be an extensive length of rail infrastructure made redundant to freight use and it should be considered as part of the project. Clearly there is the potential for this line to become part of the Adelaide passenger train network to allow for an expanded and more efficient metropolitan line plus to service the expanding population growth in the Adelaide Hills and eastern fringe and as a tourist potential. The Study makes great emphasis on the impact of the various freight line options on the use of rail versus road for freight, but a disused freight line used for expanded commuter transport could also have a significant impact on passenger vehicle road use.

In summary, in my opinion the Study has invited submissions at a premature state with inadequate facts for reasonable submissions to be made and basically inviting comment on a number of issues that may/will become irrelevant when the economic factors are considered. (The Study itself actual highlights this at section 4.3.1 Assessment criteria, where it states that the Strategic Merit Test “does not provide a basis for a firm view on which is the best option, or whether any of the improvement options are economically justified”) This project and proposals are clearly going to be primarily economically driven and yet submissions are being called when there is insufficient information provided on two of the key factors, Operating performance and Project costs.

Given the above comments, my submission should be noted that the Discussion Paper as presented appears to make a compelling case for option 3 based on the best overall balance satisfying the stated key factors

- Operating performance
- Community amenity
- Future demands
- Project costs