

24th November 2009

Adelaide Rail Freight Movements Study
Department of Infrastructure, Transport
Regional Development & Local Government
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Canberra ACT 2601

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RE: Response to Adelaide Rail Freight Movements Study

SCT Logistics (SCT) is Australia's largest privately owned rail freight operator. SCT'S principle operation comprises of World class terminals in Melbourne Adelaide Perth and Parkes (NSW) for consolidating and the distribution of General Freight in our purpose built rail vans and containers on the east west rail corridor.

SCT welcomes the opportunity to express an opinion on the "Adelaide Rail Freight Movement Study" (ARFS) and commends the Department of Infrastructure, Transport, Regional Development and Local Government for initiating the discussion document.

The discussion document clearly articulates the importance of the Rail freight corridor between Melbourne and Adelaide to the SA economy, community, environment, logistic chain, rail operators and also identifying shortfalls in the existing infrastructure restraining rail operators from operating efficient trains.

It is in SCT's view that the restraints associated with the geometry (curves and gradients) of the infrastructure in the Adelaide hills have gone unaddressed for too long and therefore should have significant priority within the overall planning of the National rail network.

In response to the questions proposed in the discussion paper SCT submits the following;

- "other Features of the route that are important to the study to take into account";
 - With the increase in population expected over the next 20 years and the geographic location of the Adelaide Hills to Adelaide making it an idyllic place to settle, SCT believes that this can only lead to greater public resentment associated with rail noise.

Due to the present track alignment, train noise cannot be eliminated and therefore there is a real possibility that as volumes increase additional operating restraints may be imposed.

- If the infrastructure is to remain in its present alignment and volume increase as identified in the discussion paper and the risk associated with catastrophic events such as, but not limited to Level Crossing incidents derailment may increase.

- “the economical growth assumptions underlying the freight forecasts”;
 - The base case forecasts based on data supplied by FROG and ARTC and increased by GDP seems a reasonable assumption.
- “the base case forecast for traffic carried over on the Adelaide hills route”;
 - The base case forecasts based on data supplied by FROG and ARTC is reasonable.
- “the relative share of freight traffic on the Melbourne Perth and Melbourne Adelaide corridors”;
 - It is SCT’S belief that the assumptions used do not take into account but not limited to potential modal shifts associated with possible legislative changes to Single Voyage Permits in Australia, road taxes and carbon trading etc...
- “the extent to which a more efficient rail alignment would improve freight services and lead to greater use of rail”;
 - SCT believe that a more efficient alignment will enable longer and heavier trains to operate at reduced transit times. This should enable greater flexibility to our existing customers.
 - It would also be fair and reasonable to expect operating costs to reduce, which in turn may change how the rail industry markets its services. It could also lead to a further reduction in road freight between Melbourne and Adelaide.
- “the option identified, and whether there are any alternative rail alignments that should be considered”;
 - SCT is not aware of any alternative alignments that may be considered.
- “the assumed freight paths and whether these reflect the choice that rail operators are likely to make”;
 - SCT’s business model is based on operating safe, efficient, cost effective trains. All assumptions in the proposal meets with our business model with the exception of axle loadings. The selection criteria associated with the one that best meets the rail industries need will be more associated with the one that satisfies community, economical and future growth expectations.

Regards,



Noel Ramsey
General Manager - Rail