



Action for Public Transport (N.S.W.) Inc.

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Dear team,

Freight Policy Reform Program

Submission on April 2024 consultation paper

Introduction

Action for Public Transport (NSW) Inc. is a transport advocacy group which has been active in Sydney since 1974. We promote the interests of beneficiaries of public transport - passengers and the wider community alike.

This submission relates to the Freight Policy Reform Consultation Paper available at https://hdp-au-prod-app-nsw-haveyoursay-files.s3.ap-southeast-2.amazonaws.com/7117/1340/7001/FREIGHT_POLICY_REFORM_CONSULTATION_PAPER_APRIL_2024.pdf.

Responses to discussion questions

Discussion question two: Do you have recommendations or issues to note about rail freight policy?

- Rail infrastructure needs to be massively improved to give rail operators some chance. (It is noted that page 71 mentions "the benefits Inland Rail will deliver". There is no mention of any other potential rail main line investment.)
- APTNSW supports the proposal for targeted realignment works on the Sydney-Melbourne line, between Maldon and Cootamundra, as proposed by Dr Philip Laird and reported in *The Guardian* at <https://www.theguardian.com/australia-news/2022/dec/15/sydney-melbourne-rail-track-upgrade-is-cheaper-quicker-way-to-slash-journey-times-says-expert>.
- The North Coast (Sydney-Brisbane) line also deserves attention, having been built a century ago to essentially branch-line standards. Consideration of its freight potential seems to have been overshadowed by the Inland Rail project, even though the northern part of that is now postponed. With this being a rapidly-growing region, straightening, duplication and electrification should be examined to serve inter-capital and regional freight and passenger needs.

Discussion question four: Do you have recommendations or issues to note about road freight?

Road pricing should be based on the fourth power relationship (between axle load and damage caused, see https://en.wikipedia.org/wiki/Fourth_power_law), not exempting battery weight for electric vehicles.

Pricing for any mode should be based on

- CO₂ emissions
- Accident costs
- Congestion costs
- Other externalities e.g. noise
- Road / track / port maintenance costs (see above re 4th power rule) Road freight safety is a continuing issue - e.g. the level crossing collision near Yunta, SA: see <https://www.abc.net.au/news/2024-05-29/atsb-releases-report-on-barrier-highway-truck-train-crash/103906938>.

Road freight economics have long been built on exploitation of drivers, with continuing issues of fatigue and drug abuse. See, for example, writings of Williamson et al at <http://www.irmrc.unsw.edu.au/documents/stimulant%20report.pdf> and <http://www.smh.com.au/comment/truck-drivers-on-the-road-too-long-to-stay-safe-20180101-h0c9q6.html>.

Employment has been for many years one of the justifications for policy makers' emphasis on road freight. With current labour shortages (and a context of renewed focus on immigration levels) this may be turned around and the ability to move a greater freight task with fewer employees may be seen as an advantage of rail.

Discussion question five: Do you have recommendations or issues to note about decarbonisation or changing technology?

With decarbonisation of freight transport recognised as a priority, freight use of current and future electrified railways should be revived. This provides for better use of infrastructure than just the substitution of batteries for diesel. Electric freight rail haulage was abandoned around the 1990s (probably encouraged by various forms of privatisation and corporatisation). Electric power when electrification took place was mainly coal-generated, but electrification now has potential to use all sources of renewable power that are on offer.

Discussion question six: Do you have recommendations or issues to note about strategic land use planning and industrial land?

The current pattern of planning and provision for rail freight has clearly been based, for many decades, on concentration in major intermodal terminals such as the newest one at Moorebank. There should be some study of whether particular industries might benefit from a return to factory-to-factory journeys all by rail, i.e. carload traffic. This would clearly require a different type of industrial site planning and development, with some return to individual rail sidings. It would imply an increase in rail shunting, a concept that has not existed for many years, but would save modal transfer and is worth considering.

Discussion question seven: Does the NSW Government provide adequate consideration of freight matters?

APTNSW believes that current transport policy is overwhelmingly biased towards investment in main roads, whether tolled or not. This has served road freight interests and also been seen as popular with drivers who are also voters. For freight transport to reduce costs and emissions, a structural shift in planning and provision are needed. See Laird's article <https://theconversation.com/australias-freight-used-to-go-by-train-not-truck-heres-how-we-can-bring-back-rail-and-cut-emissions-219332>.

It is worth considering whether construction of all forms of transport infrastructure would be better provided with a rolling program of investment and a stable workforce, than a pattern of periodic announcements and packages. This would also assume greater co-ordination with Federal and interstate governments than currently exists.

Transport policy in general in public discourse has often been dominated by high-speed passenger rail, the costs of which are of a magnitude, especially when compared against potential revenues, to often shut down discussion. This obscures the role that can be played by more modest rail investment which would benefit both freight and passenger services - effectively putting rail and road on a common footing again.

