Submission to the review of the delivery of the Inland Rail Program

Response to key themes 3 and 4

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[redacted]

1. The ARTC's approach was one in which its EIS was **confined** to the impacts only on areas where new infrastructure will be required and not the entire rail corridor that will be subject to increased traffic volume with much longer and heavier freight trains. The processes used in the selection and refinement of the Inland Rail route have failed in many respects and have not been fit-for-purpose especially in regard to appropriate consideration of benefits and impacts. The EIS document lacks appropriate disclosure and accountability for the future impacts resulting from this development. In particular, it does not cover all the impacts of the City of Wagga Wagga and failed to investigate an alternative route around the city.

2. The long-term health outcomes for people in Wagga Wagga who live or work near the rail corridor, including school students, are likely to be significant. These concerns were not reaqlly addressed. The UK *Health matters: air pollution* (2018) paper begins – "Poor air quality is the largest environmental risk to public health in the UK, as long-term exposure to air pollution can cause chronic conditions such as cardiovascular and respiratory diseases as well as lung cancer, leading to reduced life expectancy. Epidemiological studies have shown that long-term exposure to air pollution (over years or lifetimes) reduces life expectancy, mainly due to cardiovascular and respiratory diseases and lung cancer. Short-term exposure (over hours or days) to elevated levels of air pollution can also cause a range of health impacts, including effects on lung function, exacerbation of asthma, increases in respiratory and cardiovascular hospital admissions and mortality."

   Additionally, the rail corridor is adjacent to the busy Sturt Highway, which together, will contribute twin rivers of toxic gasses in which citizens will be immersed for years to come. The International Agency for Research on Cancer classifies diesel engine exhaust as carcinogenic to humans. Tech Paper 14 in the Environmental Impact Statement for Inland Rail - Albury to Illabo lists 10 substances of interest including oxides of nitrogen, carbon monoxide, sulphur dioxide, volatile and semi-volatile organic compounds and particulate matter less than 10 and 2.45 micrometres that are linked to both short and more complex long-term health problems. Recent studies have linked increased risk of dementia to greater exposure to PM2.5, NO2/NOx, and CO.

3. The level of disclosure and transparency was restricted and did not include considerations of future maintenance costs likely to accrue in the near future. For example, the viaduct across the Murrumbidgee flood plain at Wagga Wagga has had a 40 km speed limit for years and, with increased traffic and higher risk of flooding due to climate change, would require considerable capital expenditure.

4. The actual period of community consultation was short and, even though it had to be extended, did not fully engage with the community via a public forum. The EIS documentation was extensive, repetitive and not user-friendly. It took me several days to read and digest the contents. Even after reading this material, I had more questions than answers.

5. The consultant who produced the EIS report consistently restates that best practice mitigation strategies will be used and thus all identified risks will be managed. This does not provide the community with adequate assurance. It does not mean that there will be no risks. The actual level of the risk depends both on the *likelihood* of an event taking place and the *consequence of* such an occurrence. Any risk assessment should have a clear delineation of the scope of the risk, identify the main concerns of key stakeholders and the political, economic, social, legal, technological and policy context. In this case, the EIS is short in terms of disclosure. These disclosures are both narrow, confined and shorter term. Moreover, Appendix E table 4 which summarises the risk analysis, includes nine areas of medium risk and six which are rated high or very high.

6. The underlying assumption in this project appears to be the need to keep the initial cost down and avoid problems associated with acquisition of land. However, the cost of maintaining the infrastructure associated with this rail link has not been considered. The longer-term benefits of initially more costly alternatives but with less negative impacts and longer-term benefits in lower maintenance costs have not been discussed.

7. If community engagement was to be both effective and productive, the above concerns would have been addressed through a more upfront approach with a higher level of disclosure of the benefits, impacts and underlying assumptions.