Submission to Independent Review into the delivery of Inland Rail
Terms of Reference:
c) review the processes for selecting the Inland Rail route to confirm it is fit for purpose and has considered both impacts and potential broader economic benefits to regional economies and communities

This submission relates to the route selection process for the Border to Gowrie section of Inland Rail (IR), and proposes that the route selection process was contradictory and based on flawed information.

Background

I am a landholder from Pampas, Queensland, impacted by Inland Rail. I have been involved in the Project Reference Group (PRG) from Dec 2016 until its completion in April 2017 as a representative of the Central Downs Irrigators Ltd board. The PRG was established by the then Minister for Infrastructure, Darren Chester, to review and assess the four possible routes in the Border to Gowrie section of Inland Rail. This PRG process is referred to on page 2-37, of Section 2.8.6.2 (Chapter 2 in the draft EIS) in the Y2G B-to-G project, and I was one of the stakeholder representatives mentioned in this section.

In this submission I will provide background to the route selection process and provide additional information from the PRG process. The detail surrounding the PRG process is taken from the Corridor Options report and the detail from this report has **not** been included in Chapter 2 of the draft EIS.

1. The Snowy Mountain Engineering report (2010) as background information

In 2010, the Queensland State Government commissioned the Snowy Mountain Engineering Corporation (SMEC) to undertake an independent assessment of four alternative routes for the Border to Gowrie section of the inland rail. The four route options considered in the SMEC report were as follows:

- Option 1 – North Star to Inglewood and then to Gowrie via ARTC alignment - 247km
- Option 2 – North Star to Inglewood and then to Gowrie via Pittsworth and Southbrook - 246km
- Option 3 – North Star to Inglewood and then to Gowrie via Karara and Umbiram - 239km
- Option 4 – North Star to Inglewood and then to Gowrie via Karara, West Warwick and Wyreema - 289km

The report states: ***Of note is that the purpose of this study is not to seek to propose any major realignment of the MBIR, but rather to review the potential issues with the currently preferred alignment such as traversing the Condamine and Dumaresq River floodplains, mitigating any potential environmental impacts on the Yelarbon Desert, avoiding protected vegetation and protected areas, minimising the impacts on agricultural land, rural communities, and reducing the number of interfaces with roads and major waterways.***

On 1 July 2015, the Snowy Mountain Engineering Company (SMEC) tabled the final report for the QLD Department of TMR, the QLD Department of State Development and QLD Rail to investigate the route selection process for Inland Rail.

The independent SMEC report selected the C3 (Karara-Leyburn) option as the preferred route over the current selected C2 (Pittsworth) route, based on a number of criteria. Some of the reasons are summarised below (taken as an excerpt from the SMEC report).

1) The C2 (Pittsworth) option traverses large sections of important agricultural areas and agricultural land, Class A. It traverses areas mapped as grazing- native until north of Bringalily State Forest, where it enters large tracts of cropping and irrigated cropping associated with the broad crossing of the Condamine River. This option passes through cropping and irrigated cropping areas for approximately 150km of its length. **This option has the greatest impact on cropping areas mapped as 'irrigated cropping' in land use datasets** (pages 45-46 of SMEC report).

2) **The C2 (Pittsworth) option has a longer travel distance than the C3 (Karara-Leyburn) option**: 246 km versus 239 km and longer travel time 3hrs 14min versus 2hrs 56 min (pages 53-56 of SMEC report).

3) **The C2 (Pittsworth) option intersects and has more impacted properties within 200 metres of the rail corridor than the C3 (Karara-Leyburn) option**: 1142 versus 935 (pages 53-56 of SMEC report).

4) **The Option 3 section has less exposure to flooding with respect to the Condamine floodplain where the ARTC alignment traverses some 20km and Option 3 some 10km**. Option 3 also has reduced exposure to expansive black soils and a lesser impact on the agricultural land associated with the floodplain. Option 3 appears to have better access to transport links including New England/ Cunningham Highways, and proximity to existing and potential future economic activity centres, including Woolworths FDC at Warwick.

This independent assessment was the same process undertaken by the Program Reference Group (PRG). However, the PRG process was undertaken by FFJV Engineers and ARTC, and thus did not provide an assessment of route selection that was independent of the IR project. We propose that the SMEC report would have been more objective as it was undertaken by an independent panel of advisors.

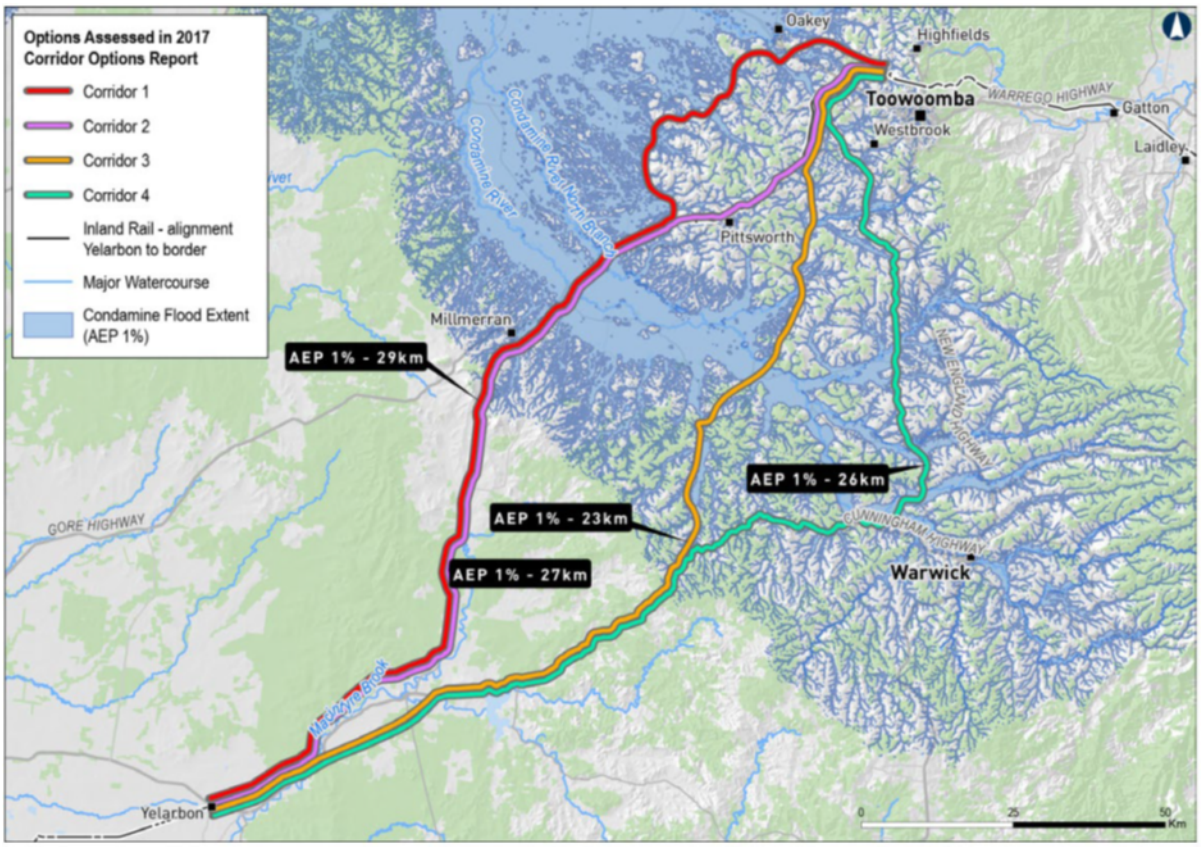
2. **The Program Reference Group (PRG) process (2016)**

The PRG process began in December 2016, to select one of the four routes from Border to Gowrie in Qld as the most suitable route. The EIS document states: "***the alternative corridor assessment process was conducted by independent consultants and overseen by the Y-to-G project reference group, a group of stakeholder representatives specifically formed for the task".*** The independent consultants referred to in this statement are FFJV Engineers; an entity formed by the companies AECOM and Aurecon. FFJV Engineers are not independent consultants and will benefit by over $56 million, as specified in the successful tenderers list (obtained under Freedom of Information).

The four routes under selection were

- C0: Base case
- C2: Wellcamp/Charlton (Pittsworth)
- C3: Karara/Leyburn route
- C4: Warwick

An additional route the C1: Base Case Modified option arose through the PRG process.



From the outset, it appeared that the C2 Wellcamp/Charlton route was the predetermined option. Members of the PRG brought forward local knowledge and information and we argued the different aspects for and against each route, including information from the SMEC report. Most of our inputs were ignored, and the process continued with strong influence from ARTC and AECOM/AURECON. In hindsight, this process also reflects the inability of ARTC to communicate respectfully and effectively in stakeholder engagements (see numerous EIS submissions on B2G and all other rail sections)

The PRG process concluded at the seventh (and final) meeting when we were presented with the results of the multi-criteria analysis (MCA) which was the basis of the route selection. The MCA workshop and scoring day was held in Brisbane on **17 March 2017**, **and was conducted by AECOM behind closed doors**, with weightings for each criteria determined by these companies. The Corridor Options Report (2017) states, ***The assessment in this report was controlled by the requirements of the ARTC MCA Framework, criteria and weightings as provided by ARTC.*** The summary of the MCA showed subjective scores and questionable weightings, and indicative costings that were not justified in any way. I present a more detailed summary and interpretation of the route comparison process below, using detailed information taken from the Corridor Options Report (2017) that is not included in the draft EIS.

3. The Corridor Options Report (2017)

The seven criteria used in the MCA are taken from Table 1 (on page (iii)) of the report and are shown below, noting that a negative score shows a less favourable outcome compared to the Base Case modified (C1) route.

The underlying seven key criteria and the results of the MCA assessment are presented in Table 1.

Table 1 MCA scoring

Assessment Criteria	Weighting	Wellcamp-Charlton	Karara-Leyburn	Warwick
Technical viability	17%	-0.043	0.595	-0.298
Safety assessment of the proposed alignment	16.5%	0.041	-0.289	-0.784
Operational approach	16.5%	0	-0.817	-0.545
Constructability and schedule	12.5%	-0.125	0.094	-0.188
Technical Sub-Total		***-0.126***	***-0.417***	***-1.815***
Environmental and heritage Impacts	12.5%	0.094	0.281	-0.844
Community and property impacts	12.5%	-0.250	0.625	-0.375
Approvals and stakeholder risk	12.5%	0	0	0
Non-Technical Sub-Total		***-0.156***	***0.906***	***-1.22***
TOTAL	100%	**-0.283**	**0.490**	**-3.03**

The weightings allocated by ARTC show that 62.5% of weight is given to technical viability and 37.5% is given to non-technical viability. It is exceptionally clear that the C3 (Karara-Leyburn) route was most favourable for the combined non-technical criteria of **environmental and heritage impacts, social (community and property) impacts and stakeholder risk**. The **C3 Karara-Leyburn** option is the route with the **most favourable environmental** and **social impact** and this relates directly to this EIS process and ToR 6.7. ARTC have chosen **not** to present this information from the Corridor Options Report (2017) in the draft EIS, presumably because it does not support the chosen route. When considering the technical criteria, it is also clear that the C3 (Karara-Leyburn) route scores most favourably for technical viability and constructability, but is down-weighted for operational approach. Operational approach is defined in the report as a combination of travel time, reliability and availability and network interoperability and connectivity. (We note here that travel time for the C3 route does not match that reported in the SMEC report.) Additionally, overall the C3 (Karara-Leyburn) route has the **most favourable overall** MCA score and should be the route of choice on this basis. **These findings are in agreement with the SMEC report that recommended the C3 option through Karara as the preferred route (see above).**

The third criteria of relevance to the EIS process and ToR 6.7 regards the **economic** impact and how this affects route selection. The construction costs for each of the routes are presented in Table 2 on page (iv) of the Corridor Options Report (2017). It appears that the C2 (Wellcamp-Charlton) route was selected as it was the cheapest route based on these cost estimates that were calculated on a like-for-like basis. The SMEC report finds equivalent costings for both the C2 (Wellcamp-Charlton) and C3 (Karara-Leyburn) options as $2.97 million, as stated on page 62-68/92 (SMEC report, 2015). (The capital cost excluding land and contingency).

The major cost differences between the C2 and C3 routes from Table 3 of the Corridor Options Report are the more expensive bridges on C3, and the direct job costs on C3. The increased cost of bridging appears questionable, however, given the numbers in Table 39 that show route C3 crosses the shortest length of floodplain for all routes considered.

Four years on from this MCA process we now have much more accurate information on route alignment, and two of the greatest challenges on the B2G route appear to be the Macintyre and the Condamine floodplain crossings. We now have more detailed information on bridging, culverts and flood model impacts that provide a very different scenario to the data that was used in the PRG-MCA process, even though the floodplain model and design is still under review. I present this information in the following sections

4. Condamine floodplain crossing and bridge costings (2021)

In the PRG process, the MCA costings for bridging to cross the Condamine floodplain were based on 3 bridges and these were of total length of 1800m for the C2 route and 1500m for the C3 route (Table 43 Corridor Options Report, 2017). Related to the bridging are the MCA estimates for culverts which are based on 1821m width of culverts for C2 and 1113m width of culverts for C2.

It is important to note, however, that the total length of the Condamine River and floodplain crossed by these routes differs by 7km (according to the Corridor Options report (2017)), with the floodplain being 12.5km for C2 and 5.5km wide for C3. Hence, the free-flow drainage proportion of flood plain (total bridging plus culverts/floodplain width) used in the MCA process for C2 is 29%, and for C3 is 46%. This indicates that different allowances were made for flood mitigation across each of these routes, so the MCA did **not** include a like-for-like **nor fair** comparison of flood impact or mitigation in the design or comparative costings. **This bias in bridging allowance made the C3 (Karara-Leyburn) route more costly for bridging.**

Further evidence is given in the SMEC report (p53), which states:
The GIS data indicates that while Option 3 may have more than twice the number of waterway crossings than Option 1 (at 129%), the difference in the total length of all structures along the alignment assumed for the strategic comparative cost estimate is proportionately less at only 55% greater. Similarly, the hydrological assessment indicates that Option 3 has 20% more structures than Option 1, but the difference in the total length of structures along the alignment is proportionately less at only -7%.

The length of bridge structures included in the PRG-MCA process are in direct contrast to the findings in the SMEC report. During the PRG process we argued this point, but our views were not taken into account. As supported by the SMEC report, the C2 Wellcamp-Charlton route traverses over 18km of floodplain at its widest point of crossing the Condamine floodplain, whereas the PRG-MCA report indicated only 12.5km of floodplain.

Therefore, the route comparison should weigh up an 18km crossing versus a 4.5km crossing of the Condamine floodplain. This wider crossing on C2 occurs primarily because the Condamine river catchment is joined by at least 7 creeks and many other, unnamed waterways and is located 35 km further downstream, below where these tributaries join together. Hence a larger volume of additional water is present on the floodplain at the C2 crossing point.

After four years of flood model calibration and validation on the crossing of the Condamine floodplain, it is clear that the rail design parameters used in the MCA process for the C2 route are totally unrealistic and acceptable. The current design has been modified to include 6034m of bridging, and an allowance for 1500m of culverts. This will result in an **increased cost ratio of 3.35** for bridging alone for the C2 route as compared to that used in the MCA process, based on a like-for-like cost estimate.
The MCA selection of the C2 (Wellcamp-Charlton) option as the **cheapest route** is based on **gross underestimates of bridge costings** to cross the Condamine floodplain. This recent additional information must impact on route consideration and budget, as the information used in the route selection process was erroneous and misleading. Note that the current bridge lengths result in a free-flow width of 60% of floodwater which is more feasible, but, in my opinion, is still not adequate to mitigate flood impact.

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Terms of Reference:

f) review ARTC's engagement and consultation approach, including options to improve engagement with communities and other stakeholders along the route, and develop a pathway to consider community concerns with the alignment.

The social impact of the poor communication and stakeholder engagement process undertaken by ARTC has been negative, and many representations to the Senate Inquiry into Management of Inland Rail project by ARTC as well as submissions to the draft EIS response along the length or the IR route have raised concerns surrounding this poor consultation. The impact of ARTC's poor and ineffective communication in local communities has led to increased anxiety, frustration and mistrust, as information provided by ARTC has consistently been lacking detail, contradictory in nature or not forthcoming. Furthermore, there is limited to no follow-up undertaken on any requested action items and a paucity of communication about the influence public opinion has had on project development, if any. This highlights some significant shortcomings of ARTC to demonstrate the expected behaviours and communication principles outlined within the four steps of *inform, consult, involve* and *collaborate*, in the engagement process (EIS: Figure 2.1). With regards to the crucially important *empower* stage of an effective public engagement and communication process (Figure 2.1), ARTC has not provided any rationale for omitting the *empower* step from their public consultation approach. The second paragraph of Section 2.5: Consultation Approach states:

ARTC depicted a five-step process in Figure 2.1 and stated that they will only be implementing the first four steps however provided no acknowledgement or rationale for the omission of the *empower* principle. This in itself provides yet another example of ARTC's lack of transparency and accountability in their public communication, consultation and engagement process. ARTC's disregard for transparency and addressing such omissions within their communication to the public also violate the principles of *inform* and *involve* in the 'promises' they have made regarding their communication.

EIS: Appendix C – Section 2.5 Figure 2.1

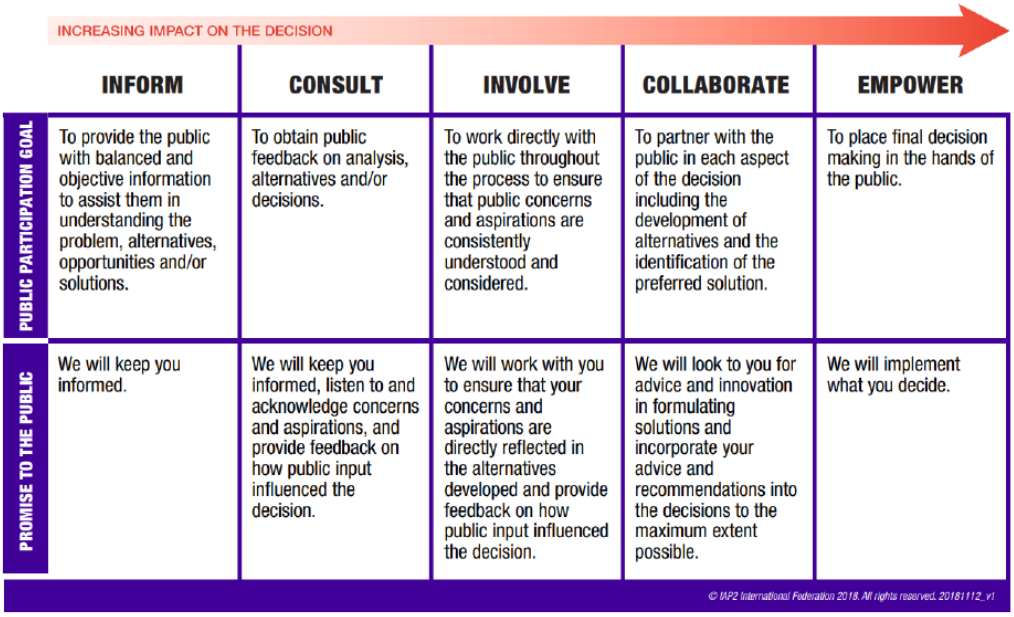

FIGURE 2.1 INTERNATIONAL ASSOCIATION OF PUBLIC PARTICIPATION (IAP2) PUBLIC PARTICIPATION SPECTRUM

Source: IAP2, 2019

The failure to provide accurate information to our affected community, combined with the organisation representatives' lack of effective interpersonal and communication skills when interacting with vulnerable community members, has created a power and authority imbalance. This is disempowering not only to our impacted individual community members but the local community as a whole. ARTC has not effectively executed the first four principles in their communication process, and has then completely omitted, with no rationale provided, the fifth step (i.e. *empower*). Through their ineffective public engagement and communication process, ARTC has consistently devalued individual community member's unique perspectives, knowledge, contributions and lived experiences, depriving these persons of power and confidence (in themselves, the process and the organisation). This fundamentally breaches 'trust' and 'credibility' that ARTC have stated they aim to 'build' in their engagement goals. Depriving a person or group of people of confidence and influence over a process, particularly one with significant impact to their wellbeing and livelihoods, is in fact *disempowering*.

In summary, the EIS provides much documentation surrounding 'the process' but little, if any, evidence on the effectiveness of engagement, specifically (i) how community concerns have been taken on board, (ii) what the action items are and whether/how these have been addressed, and (iii) outcome assessment of how action items have been addressed, including the quality of the work in addressing action items (as opposed to arbitrarily 'ticking the box'). Section 2.5, Appendix C on Stakeholder Engagement in the EIS document claims:

"Based on analytics, engagement rates and ad-hoc informal feedback, the engagement program continues to evolve to better meet stakeholder requirements. A stakeholder satisfaction survey has not been undertaken to date; however, Inland Rail is investigating survey options for future phases of the Project."

As no Stakeholder satisfaction survey has been undertaken, there is zero evidence to substantiate the claims surrounding the effectiveness or results of Stakeholder engagement made in the EIS. We propose that this has been a deliberate omission, rather than an oversight, and claim that this two-way feedback must be an essential component of the EIS document. **The lack of outcome measurements not only means we have no data on how effective the Stakeholder Engagement process has been, but more importantly, that there is no accountability on the behalf of ARTC to evaluate their own effectiveness in engagement, specifically with impacted landholders.**

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f) review ARTC's engagement and consultation approach, including options to improve engagement with communities and other stakeholders along the route; and develop a pathway to consider community concerns with the alignment.

This submission relates to the flood impacts on the Border to Gowrie (B2G) section of Inland Rail (IR), and proposes that there is huge environmental risk, particularly to the fragile black vertosols and agricultural practice and profitability on the fertile Condamine floodplain. In parallel, it also documents the engagement and consultation process with ARTC surrounding flood modelling and impacts.

Background

Local landholders on the B2G section of IR are extremely concerned about potential dangers to lives, homes, rural infrastructure and prime agricultural land, our unique and highly fertile black cracking clay (vertisol) soil resource and agricultural enterprises due to an unacceptable flood risk imposed by the IR design. The design proposes to raise an embankment up to 3m high across the 18km length of the floodplain, so water will no longer be able to over-top this structure during a flood. The design also proposes to reduce the free-flowing extent of water over the top of the current embankment of 18km to approximately 6km of bridging and 1.5km of culverts. This will concentrate the flow of water under this new IR structure and reduce the free-flowing cross-section of the flood plain by more than one-half.Concentrated water flow will result in an increased risk of erosion as water is forced through culverts at an increased speed of greater than 0.5 m/s, resulting in both short-term and long-term impacts that are irreversible due to changed water flow patterns and increased velocity resulting from the proposed rail design.

Key Points

a. We have been communicating with ARTC for over 5 years, and they have been dismissive of concerns raised about flood model accuracy and associated rail design. Historic flood records provided by local landholders have been used from 47 stations (plus 3 gauging stations) as a validation of the flood model. These records showed a bias in under-prediction of modelled flood heights, as 37 out of 46 historic flood records (excluding 4 outliers) were under-predicted by the flood model, whereas only 9 were over-predicted. Additionally, there appeared to be spatial bias and greater errors in calibration for historic events around Pampas.
b. The flood model is calibrated on only two flood events (1991 and 2010) and we question whether this is sufficient data to build a model for the complex nature of the Condamine floodplain. Since then there have been numerous floods and these additional records have not yet been used in model validation.
c. Dr John Macintosh was appointed by the Southern Downs Community Consultative Committee (SDCCC) in 2019 to review the flood model and found the model "fit for purpose". Like ARTC, he has supported a model that was missing significant volumes of water with an under-prediction bias for historic flood records from landholders. Dr McIntosh explained model discrepancies as "errors in historic flood records" provided by landholders, discounting our local knowledge and credibility.
d. The current rail design on the Condamine floodplain submitted in the draft EIS has been devised against a flawed flood model, and ARTC produced inundation maps showing the impact of the rail design in the draft EIS claiming increased flood heights at sensitive receptors were ***acceptable***. In the EIS response we requested a definition of "acceptable" impacts from the Coordinator-General and an indication of how the flood impact objectives had been defined and justified.
e. On 6 September 2022, the Independent International Panel of Experts for Flood

Studies of Inland Rail in Queensland released their final report, with findings for the B2G section. These findings largely substantiated the concerns and claims raised by the local community regarding flood model issues and accuracies over the past 5 years. For Back Creek and the Condamine River, the Panel raised 36 issues for discussion with ARTC, of which 5 were of Very High importance and 11 were of High importance.

f. **There is still a long way to go with flood modelling, rail design and impact assessment on the Qld section of IR.** In the final report from the International Panel, there were 378 issues raised for discussion with ARTC surrounding the Qld flood modelling. Of these, 132 issues are subject to additional information in the revised draft EIS, 89 are subject to ARTC committing to Panel's recommendations being addressed in Detailed Design, 11 are subject to Panel's implementation of geomorphological assessment.

In Summary

- In the first draft EIS, the demonstrated changes in the inundation maps against the rail design were ***unacceptable*** for our farming systems on the Condamine flood plain and do not meet ***best practice agricultural management on the floodplain.*** Additionally***,*** the impact of increased flood heights resulting from the rail design on sensitive receptors (residences) in our flood plain communities are ***unacceptable.***
- The recommendations by the International Panel of Flood Studies requires ARTC to provide additional information and consultation and engagement with the community. Currently we do not have accurate information on flood model impacts produced from an accurate modelling process to inform rail design.
- **Based on the issues identified by the International Panel, the current rail design is assessed against a flawed flood model and may/will require modifications in the detailed design phase**
- Given the track record of ARTC in the past, local landholders are extremely concerned about ARTC commitment to recommendations being addressed in the Detailed Design phase. There is a distinct lack of trust in the consultation process with ARTC due to unprofessional behaviour in the past, and new solutions need to be identified for successfully negotiating impacts of flood risk and mitigation with landholders into the future.

Submission to Independent Review into the delivery of Inland Rail
Terms of Reference:
c) consult with stakeholders across the freight sector to test the Inland Rail service offering and the importance of this in achieving the overall benefits of Inland Rail, including how it provides new capacity and resilience to support Australia's national supply chain network.

This submission relates to the project rationale for improved access to regional markets in the Border to Gowrie section of Inland Rail (IR), and proposes that the business case is misleading and based on flawed information.

Background

Sections 2.5 to 2.7 in the draft Environmental Impact Study (EIS) related to the business case for IR make unsubstantiated claims about IR benefits. These claims are as follows:

2.5.1.1 **Improved access to and from regional markets**
Improved linkages to regional areas for inter-capital freight, such as via the direct connectivity that would be provided between the existing QR South Western Line, Millmerran Branch Line and West Moreton Line. Inland Rail is expected to attract 2 million tonnes of agricultural freight from road to rail, with a total of 8.9 million tonnes of agricultural freight expected to be carried in 2050.

2.5.1.2 **Reduced costs for the market**
Reduced transport costs may improve competitiveness of key markets and economic activity, particularly in the agricultural sector
Inter-capital and agricultural freight currently travelling by road should benefit from reduced operating costs due to economies of scale in rail relative to road transport.

2.5.2.4 **Enable complementary market-driven investments**
Double stack terminal capacity in Melbourne and Brisbane and ability to accommodate 1800 m trains initially and up to 3600 m trains in the future.
Investment in connecting existing rail lines and rail sidings in south-west Queensland to the Port of Brisbane, for example the South Western Line, the Millmerran Branch Line, the West Moreton Line and metropolitan Brisbane lines.

2.7.7 **Queensland Freight Strategy—Advancing Freight in Queensland**
The development of Inland Rail, and the Project, supports the strategic intent and direction of the strategy, by ensuring connectivity to existing operating lines, such as the South Western Line and the Millmerran Branch Line, to improve the efficiency of rail freight. The Project is projected to improve the productivity of regional and state supply chains and industry.

Description of the Issue
The project rationale in Chapter 2 of the EIS related to business case development for IR is based on broad statements of benefit to the agricultural industry on the Darling Downs and South Western Qld that are not substantiated by fact. We provide alternative evidence to demonstrate that claims made in specific sections of the EIS are misleading and not based on the reality surrounding the Inland Rail project as it is currently designed.

1. The Millmerran Branch Line was severely damaged by flood waters in the 2010-2011 between Millmerran and Brookstead and Qld Rail (QR) has not repaired this damage. Bulk grain is the only commodity moved on this line over the last 30 years, and no grain has been transported from Millmerran to Brisbane by rail for over 10 years. The

Millmerran Branch Line is operational from Brookstead East but carries very few trains. Inland Rail freight for grain shipments from this region cannot compete with road transport rates, as IR does not proceed to the Port of Brisbane.

2. Justification around agricultural markets in Sections 2.5.1.1 and 2.5.1.2 states IR is ***expected*** to carry increased agricultural freight and that freight currently travelling by road ***should*** benefit from IR and this ***may*** improve competitiveness of the agricultural sector. These claims are based on no substantiated evidence and we present current scenarios to refute these claims.

    a. Grain deliveries on the Millmerran Line (from Brookstead) and the South-West line are for export markets and require access to Port facilities. However, the current IR design does not go to Brisbane Port but terminates at Acacia Ridge. The double handling of freight at the Acacia Ridge terminal will add short-haul costs for agricultural produce which, in addition to rail costs based on current pricing, will exceed the cost of direct port delivery via road.

    b. The nature of grain handling and market delivery is currently changing with multiple merchants and suppliers replacing the single desk structure of GrainCorp being the sole marketing agent. Grain Corp facilities are the only merchants that use existing rail infrastructure. All other merchants take grain directly from their own business premises or from farm-gate to Port and this removes a second layer of cost due to doubling handling at Grain Corp depots on existing QR rail lines.

    c. As well as cost, time is an additional component in the comparison of rail vs road delivery, particularly when time is critical when filling a container ship berthed at the Brisbane port. GrainCorp can now deliver grain from farm gate to Brisbane Port within 3 hours, and this would take longer than the triple handling link using a proposed IR facility. Current deliveries allow GrainCorp to receive up to 50000t per week via road freight as compared to 10000t per week by rail retrieval system. The added time component to deliver grain from the farm gate, unload into grain receivals, load onto rail, unload at the Acacia Ridge terminus, load onto trucks and transport to the Port will render the use of rail from the Darling Downs as infeasible.

    d. A similar scenario exists for the horticultural industry and we demonstrate this with an example of produce supply; for example, lettuce from the farm gate in the Lockyer valley to Woolworths in Melbourne. Currently the truck is loaded from the farm storage direct to transport, and takes approximately 22 hours to be delivered to the Woolworths door in Melbourne. Using Inland Rail, produce would be loaded onto trucks for a short delivery to the nearest receival depot which would most likely be Acacia Ridge in Brisbane. The horticultural produce would be delivered from Acacia Ridge to the rail terminus in Melbourne taking approximately 24 hours for the rail journey, then unloaded onto trucks for local delivery in Melbourne. The additional road delivery transit and handling time would likely add a minimum of two hours at each end, a total of 28 hours of travel with additional costs for 3 modes of transport with additional handling charges.

In summary, the claims in the EIS that the rail route would be faster and more cost effective

have no basis on fact nor are they supported by documented evidence for these claims. We have presented some simple scenarios that dispute the claims in the EIS and provide facts to show that the statements are misleading.
This section of the EIS does not address the perfectly feasible and more economic scenario of the current situation providing a better business proposition than inland rail transportation. In this local business scenario is does not ***Present and assess feasible locality alternatives or discuss the consequences of not proceeding with the project.*** Rather it presents a false business case to support the project.

The business case needs to be rewritten to accurately reflect the current reality of road versus rail options for local agricultural products on the South West and Millmerran Branch lines. Specifically, transit times and costs, including allowance for double and triple handling must be included in these scenarios to demonstrate and substantiate the business claims being made in the EIS.