






Our Ref: MT:RK:20190271


10 November 2022

Kerry Schott AO  
Australian Government  
Department of Infrastructure,  
Transport, Regional Development,  
Communication and the Arts

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Dear Ms Schott,

**RE: Our Client – Ivory's Rock Foundation  
INLAND RAIL PROJECT**

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We are pleased to provide on behalf of Ivory's Rock Foundation an 8-page Submission.

To assist we also provided a brief executive summary and table of contents at the beginning.

Should you have any queries please do not hesitate to contact us.

Yours faithfully  
NEUMANN & TURNOUR

Dr Matthew Turnour  
Chairman  
Enc



# Submission on behalf of ***Ivory's Rock Foundation*** to the Independent Review of the delivery of the Inland Rail Program

10 November 2022  
File no. 20190271  
Contact: Dr Matthew Turnour

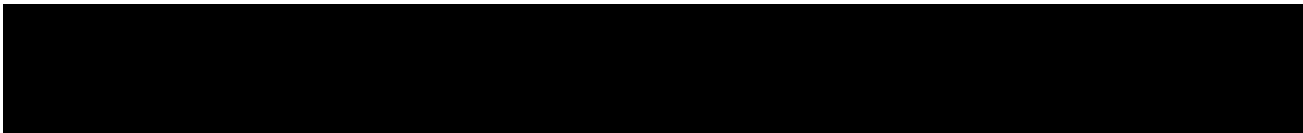


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*“Ivory’s Rock Conference Centre is a unique land use .... an outdoor conference centre .. dependent upon a quiet rural amenity, ... characterised by a noise sensitivity that is different to many of the other land uses within the area. Camping on-site during major conventions, as well as daytime conference activities, are likely to be particularly sensitive to noise impacts...”*

*Southern Freight Rail Corridor Final Assessment 2010*

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# The Executive Summary and Table of Contents

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1. Ivory’s Rock Foundation (‘IRF’) thanks the government for this review as it is one of the most, adversely affected stakeholders of the Calvert to Kagaru Inland Rail section (C2K). Flora and fauna on the C2K section are also among the most threatened by the Inland Rail Project.
2. IRF submits that improvement in ARTC’s governance and management must begin with ARTC being required to comply with ARTC’s Terms of Reference (TOR). IRF sets out examples of non-compliance with TOR 5.1, 11.122 and 11.157 in relation to both its dealings with IRF and others in the C2K section. As these breaches go to the heart of ARTC’s governance and management responsibilities progress is unlikely for C2K without addressing these issues.
3. IRF submits that this Review cannot deal with the access to intermodal terminals and new opportunities and benefits independent of its Review Term c). When regard is had to Review Terms c) it is clear that the rail should either stop at Gowrie or continue to Gladstone. In any case, it should not proceed beyond Ebenezer to C2K. The submission sets out some of the relevant data and identifies some of the inadequate costing to date.
4. IRF submits that the processes for the selection and refinement of the Inland Rail route are not fit for purpose and cannot be fit-for-purpose until the overarching goal is re-examined in the light of the actual needs of Australia. On this point IRF invites the Review to consider the overarching goal of Melbourne to Brisbane in 24 hours. It submits that this goal is either the wrong goal, or overweighted. The process of selection and refinement of the route must begin by revisiting this premise. Factors that inform this submission are set out.
5. IRF submits that ARTC has failed to consult as that term is understood in development projects. It submits that there are six practices adopted in megaprojects to vitiate or reduce community engagement and evidence of this, that has been provided to the Queensland Government, is summarised and developed slightly in this submission.
6. For convenience a table of contents is provided below.

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## Introducing Ivory's Rock Foundation

7. Ivory's Rock Foundation (IRF) is a charity registered for educational purposes.<sup>1</sup> People come to IRF's Convention Centre (IRCE) from all over the world to experience peace in nature. It is one of the few international destinations of its kind capable of providing conventions and events for up to 5,000 people with a nature-based outdoor experience. A convention in 2018 recorded visitors from 60 countries. To place this in a comparative context, the new (December 2016) Sydney International Convention Centre theatre seats 8,000 people. An independent report provided by Gibson's Consulting in 2018 estimated a contribution to the local economy from inception to 2032 at almost \$350 million.<sup>2</sup>
8. IRF is at Peak Crossing, located on the Calvert to Kagaru (C2K) section of the Inland Rail in Queensland, and part of the Public Private Partnership (PPP) Project.
9. C2K is one of the limited number of Greenfield sites. It will have possibly the highest number of predicted train movements of the entire Melbourne to Brisbane alignment, estimated at 42 train movements at commencement and increasing to 51 trains per 24 hours by 2040.
10. IRF is a member of Land for Wildlife. It holds Bushland Conservation Agreements with Ipswich City Council. The 600+ hectare property developed since 1992 by IRF is a major flora and fauna reserve. The land includes extensive Koala habitat and is part of the Flinders-Karawatha wildlife corridor which the proposed C2K will bisect. Rail is being introduced into one of South East Queensland's most scenic landscapes inhabited by endangered species.
11. IRCE is only 500 metres from the Inland Rail alignment at the closest point. It is expected that the effect of the Inland Rail will potentially make the conference facilities unviable.
12. IRF is therefore arguably, one of, the most adversely affected stakeholders of the C2K section and the flora and fauna of the C2K section are among the most threatened by the Inland Rail Project.
13. In the remainder of this submission, we set out our instructions under the headings suggested. The Terms of Reference for this Review are broad and go to the core issues. The consultation questions are narrower. As, in IRF's view, some of the issues go to fundamental questions about the project as a whole, this submission, while organised under the headings requested, extends beyond the consultation questions asked and addresses the more fundamental questions with a view to assisting this Review more comprehensively.

## 1. ARTC governance and management

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14. While there are many ways in which ARTC could improve its governance and management arrangements for the delivery of the Inland Rail Program in this section IRF submits that fundamentally ARTC needs to comply with its terms of reference (TOR). We discuss three of the TOR.
15. Clause 5.1 of the TOR states that "the objectives of the EIS [Environmental Impact Statement] are to ensure that all relevant environmental, social and economic impacts are identified and assessed, and to recommend mitigation measures to avoid or minimise adverse impacts."

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<sup>1</sup> For more information about Ivory's Rock see [www.ivorysrock.org.au](http://www.ivorysrock.org.au) and [www.Ivorysrock.foundation](http://www.Ivorysrock.foundation)

<sup>2</sup> Report has been provided to ARTC and can be provided to this Review if needed.

ARTC has not done this. ARTC has relied upon two criteria *it* chose that are not in the TOR; namely:

- a. A noise impact “trigger level” of L<sub>Amax</sub>80 db(A); and,
- b. an “equity” concept.

16. It has elevated these factors from useful tools to TOR criteria in breach of its obligations. Doing that has had the effect of making any discussion with reference to the actual TOR impossible as ARTC cannot be engaged on the TOR – only on these two criteria. ARTC has before it evidence that the natural quiet of Ivory’s Rock Foundation is the equivalent of a recording studio, and that its largely outdoor and camping operation is dependent on a quiet environment. ARTC knows that IRF is unique and yet it has not taken this into account to distinguish this property from suburban properties. It will not discharge its TOR until it is informed by its own research and the earlier Southern Freight Rail Corridor research and acknowledge this impact. Namely that Ivory’s Rock is ‘a unique land use’ with a ‘noise sensitivity that is different from many of the other land uses within the area’.<sup>3</sup>
17. To comply with the TOR it is necessary for ARTC to report accurately on the environmental, social and economic impacts identified in relation to Ivory’s Rock and other stakeholders affected by the C2K route. It must assess accurately the damages of the inland rail on IRF. It must recommend mitigation measures to avoid or minimise adverse impacts on Ivory’s Rock. ARTC has not done this.
18. Clause 11.122 of the TOR states that the EIS should “predict and map the impacts of the noise and vibration emissions from the construction and operation of the project on the environmental values of the receiving environment, including sensitive receptors”. It must have regard to the fact that the impact the proposed section in question “will have upon the local communities in the study area is significant”. ARTC provides information on the World Health Organisation guidelines for sleep disturbance advising that the recommended internal noise levels “should not be above L<sub>Amax</sub> 42dBA to preserve sleep quality”, and a conservative L<sub>Amax</sub> 49dBA externally. ARTC advise on the same page that noise levels of L<sub>Amax</sub> 49dBA “are only likely to be exceeded within 1 km distance (as a guide)” and states “based on the noise modelling, operational railway noise levels could be above L<sub>Amax</sub> 49 dBA within approximately 1 km from the rail corridor, within which distance night-time noise levels may have the potential to result in sleep disturbance”. An analysis of ARTC’s tables in Noise & Vibration technical report Appendix D Part 2 indicates that dwellings well outside the 1 km distance are impacted by noise levels well above 49dBA. Only 1 dwelling was listed as being below L<sub>Amax</sub> 50dBA while approximately 1,100 dwellings were listed at between L<sub>Amax</sub> 60-79dBA. The effect of this is that these residents do not qualify for any noise mitigation as they are below the trigger level. If ARTC complies with the TOR the residents at these dwellings may be entitled to compensation. Noise consultants have predicted noise impact levels on IRFs property of L<sub>Amax</sub> 62dBA nearly 3 km from the alignment with facilities closest the alignment exceeding L<sub>Amax</sub> 75dBA).<sup>4</sup>
19. Clause 11.152 Economic Object (a) of the TOR clearly states that the aim should be to “avoid or mitigate adverse social and economic impacts arising from the project”. To date there has not been any recommendations regarding mitigation of any adverse social and economic impacts arising from the project on Ivory’s Rock. If, as seems likely, the conduct of IRCE by

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<sup>3</sup> Southern Freight Rail Corridor Final Assessment 2010 page 27 4.5.3

<sup>4</sup> Details have been provided to ARTC and can be provided to this Review if needed.

IRF will become unviable then that is a cost to the community estimated to by Gibson's at in excess of \$183 million over 15 years. The cost to international tourism of the loss of visitors from 60 counties to IRF's conferences, must be offset against any benefits in a genuine assessment of costs. IRF is but one of many stakeholders adversely affected by the C2K section. The Gowrie to Kagaru section is through some of Australia's best farming land and through country townships. The cost of adverse impact on each business affected, particularly those like IRF that might become unviable, must be properly assessed. So far as IRF is aware that assessment has not been done as required by the TOR. Attempts to flag this as an issue have not been taken up by ARTC so far as IRF is aware.

20. For the TOR to be satisfied, a basis must be laid for financial compensation on just terms for Ivory's Rock to enable it to restructure its operation and the location of impacted facilities. The impact of the noise from the C2K section on these 1,100 dwellings must also be addressed properly if the TOR are to be satisfied. To this date all discussion to this effect between IRF and ARTC have not borne fruit. IRF acknowledges that this is a difficult issue for ARTC. It may well be that the cost of remediation exceeds the value of all of IRF's assets. The best way to deal with this is, though, honestly. It is not to change but to properly discharge the TOR.

## 2. The role of Inland Rail

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21. Inland Rail's many benefits are set out well in ARTC's materials. The contribution that IRF can bring to this discussion of benefits is quite limited. It submits that this Review cannot deal with the access to intermodal terminals and new opportunities and benefits independent of review term c). Having regard to review terms c) requires undertaking a proper cost-benefit analysis of the section of the line in question. In this section IRF submits that each substantive section from Gowrie to Acacia Ridge cannot be justified. But even if some section, say even all of Gowrie to Ebenezer is warranted, the C2K section cannot be justified when the overall impact is properly considered. The cost far outweighs the benefits. The rail should either stop at Gowrie or continue to Gladstone. The data discussed in this section and the next identify some of the costs and the inadequate costing to date.
22. The community that benefits from a 24-hour train service from Melbourne to Brisbane might be much smaller than is presently appreciated. Only 10% of trains on inland rail (C2K section) are classified as domestic "urgent" freight. Domestic urgent freight is freight travelling as quickly as possible (within 24 hours from Melbourne to Brisbane) for companies such as Woolworths, Coles, and Australia Post. A further 20% of trains are to be for domestic freight (other) which comprises non-urgent goods. For these the 24-hour service is not critical. The remaining 70 percent of users of the service is anticipated to be for export goods largely comprising coal. The significance of this is discussed more below.
23. The loss or damage to some of Australia's best farming land will be greater than if the rail continued to Gladstone.
24. The loss of amenities of life caused by noise in country towns, rural-residential areas and suburban Brisbane would be avoided if the rail continued to Gladstone.
25. There is no adequate supporting road networks for these proposed intermodals at Bromelton, Kagaru and/or Acacia Ridge. Further, these are in or near highly populated urban areas. A proper assessment must take this into account. That account should include the impact of:

- a. the Bromelton proposal on the highly congested Lindsay Highway which is only now being upgraded to dual-carriageway;
  - b. an intermodal being located at Bromelton or Kagaru which is an area already struggling to provide infrastructure to cope with large new housing developments (e.g. Flagstone) and a rapidly increasing population;
  - c. enormous increase in congestion on local roads;
  - d. substantial increases in noise pollution in residential areas; and,
  - e. the costs generally associated with putting more trucks on the road, not off the road in these communities.
26. Alongside this are the devastating impacts of the Inland Rail on the quiet and environmentally sensitive C2K region which the Inland Rail would have to traverse to reach Bromelton.
27. The SFRC Report stated that the extent of the changes caused by the introduction of the railway line had the potential to decrease biodiversity. This issue is discussed in more detail below. For the purposes of assessing the role of inland rail it is important to factor into the cost the disbenefits of any declining biodiversity that will result from building the C2K section.
28. There is a need for the government to engage with this material in a way that does not simply ask what the benefits are but weighs honestly and fairly the benefits against the costs. This submission picks up only some of the issues perceived as critical by IRF. There are many impacts not mentioned here that have been identified and discussed in EIS submissions and Senate Enquiry submissions.

### 3. The processes for the selection and refinement

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29. The processes for the selection and refinement of the Inland Rail route are not fit for purpose and cannot be fit-for-purpose until the overarching goal is re-examined in the light of the actual needs of Australia. If that is done, IRF submits that while there remains a need for an inland rail project the overarching and seemingly non-negotiable goal of Melbourne to Brisbane in 24 hours is either the wrong goal, or overweighted. The process of selection and refinement of the route must begin by revisiting this premise. While there is significant value in the inland rail line to Gowrie, IRF submits that the C2K and more generally Gowrie to Acacia Ridge cannot be justified. IRF submits that the rail should either stop at Gowrie or, ideally go on to Gladstone. There are many reasons for this but the factors most important to IRF include:
- a. The direct financial cost is staggering. It is also often not fully disclosed because it is treated as part of a separate PPP. The present estimates do not seem to include estimates for proper compensation for affected stakeholders but this will need to be include when proper regard is had to the TOR. To these costs must be added the cost of indirect disbenefits such as the potential closure of IRCE estimated for IRF alone at \$183 million over 15 years.<sup>5</sup>
  - b. The need to exclude 'artificial' benefits or properly assess only marginal improvements. For example it is estimated that 38-40% of all trains on C2K will be coal trains with existing trains currently using the existing West Moreton Line transferring to the C2K route. IRF

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<sup>5</sup> Report has been provided to ARTC and can be provided to this Review if needed.

acknowledges that this is a complex issue with many competing interests. The point that is made here is that a careful granular assessment is needed of actual benefits. The actual benefit for the actual anticipated stakeholders must then be assessed fairly against the actual detriment to other stakeholders.

- c. An accurate reassessment must include the number of trains that actually need to traverse the whole route in 24 hours. That number might be very small, and if so, the cost-benefit calculation might change significantly. Tables 21 and 22 in the ARTC Draft EIS (2020) for C2K submitted to the Queensland State Government shows that very few of the trains will actually travel the full route. Of those that will it is not clear which will have a Queensland port as the final destination. Of those it is not clear which would prefer Brisbane over Gladstone as the better port facility. Of those remaining, it is not clear for how many a 24-hour trip from Melbourne to Brisbane is important. ARTC might be committed to a goal that very few customers actually need. That this information regarding future freight demand is not readily and publicly displayed transparently but rather has been put together by our client for this submission is troubling and speaks to the need for TOR b) regarding future freight demand to be undertaken without preconceptions.
  - d. If timing is critical, there remains a fundamental problem with the Gowrie to Acacia Ridge sections and that is that it is slower than trucks. It should not be built until it is established that this construction will reduce delivery times. At present, data provided by ARTC shows that domestic freight will reach final destinations in SEQ faster if offloaded at Gowrie than it can be if it is first carried by train to other intermodals in SEQ. This should inform the assessment of TOR b) iii and iv.
  - e. If product is for export by shipping, it must also be established that, overall, Gladstone is an inferior port to Brisbane if Brisbane is to be preferred. It is IRF's understanding that Gladstone is a superior port. It is submitted that the long-term national interest is in exploiting the superior port. This should inform not just the assessment of TOR d) vi but also all aspects of d) and c). In this context the lost opportunity to develop Gladstone must be factored as well as the adverse impact on Brisbane.
30. The impact on flora and fauna is discussed in the next section but a proper process for the selection and refinement of the Inland Rail route must consider and place appropriate weight on the impact on the environment. Proper weigh needs to be placed on the fact tha the 'Flinders Karawatha Corridor ... is recognised for its significant conservation, recreation, cultural heritage and social values'.<sup>6</sup> Put simply by proceeding with C2K, the commonwealth may be destroying land needed for endangered species of flora and fauna to build an unnecessary rail line for coal trains. This consideration should not be confined to TOR d) iii. It is a factor that impacts the TOR generally, but particularly also a)iii, b) generally, d)ii, d)iv, e) as disbenefits, and f).

## 4. The effectiveness of ARTC's engagement

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31. IRF continue to engage as constructively as it can in consultative processes. Engagement involves genuinely considering alternatives, including major changes where those changes

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<sup>6</sup> See [Flinders Karawatha Corridor - vision and planning for future \(laca.org.au\)](https://laca.org.au) for more details.



are sensible. That has not been IRF's experience of engagement with ARTC. IRF's experience has been the opposite. ARTC failed to consult as that term is understood in development projects. There are six practices adopted in megaprojects to vitiate or reduce community engagement.<sup>7</sup> We have provided to the Queensland state government, on behalf of IRF evidence of each of the six namely:

- a. To overwhelm the stakeholders
  - b. To frame the messages in misleading ways
  - c. To mask disturbing or damaging information
  - d. To mask an absence of content
  - e. Circular reasoning and burying, and
  - f. To employ tactics that are perceived by stakeholders as consciously or unconsciously deceptive.<sup>8</sup>
32. The DEIS for C2K is over 7,000 pages. That is **overwhelming** in itself for members of the public. All the more so when the time for response is relatively short.<sup>9</sup> Our client had a person with a PhD working on this and he found the document not only lacked accessibility but was difficult to work with. He reported that there was a lack of accurate summaries that set out in a balanced way the issues or the community concerns. He found the complexity heightened by the seeming impossibility of understanding the material without technical support.
33. The way material is provided regarding wildlife **seems to mislead** the reader into a belief that there has been fulsome consultation regarding wildlife and that where there is adverse impact compensation is appropriate, but this is not the case. Consultation regarding the bifurcation by the C2K section of the Inland Rail of the Flinders-Karawatha wildlife corridor and impact on habitat across the alignment have been formal and unproductive – although illuminating as to the approach taken by ARTC. As a result of discussions with ARTC it has become clear to IRF that the five fauna tunnels in the Peak Crossing region that were offered in the first draft of the EIS were actually for bridges that were needed for engineering purposes that had no relationship with fauna populations or their movement corridors. In the current consultation documentation, there are now 27 bridges, however, again, questioning of ARTC revealed that the bridges were still based on engineering requirements, not koala and other fauna population needs. IRF is informed that ARTC is now conducting research to prove *post-facto* that the predetermined tunnels are effective. ARTC falls back on last resort on providing offsets. Offsets are highly problematic for a territorial species like Koala with specific and localised food tree needs. Transplanted koalas are at risk for lack of the correct fodder.<sup>10</sup>
34. **Masking disturbing information** is evidenced in paragraph 18 above. A further example is in relation to one chapter and appendix of the C2K section, Chapter 16 Social and Appendix R Social Impact Assessment Technical Report. This masks the absence of action on social problems by detailed description of only the situation. The reader is presented with 120 pages and 289 pages respectively. In itself the wealth of data is impressive, however a closer analysis shows that most of the information is taken up with a baseline sociological descriptive account of the community as it is today, before the rail, not the impact on the

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<sup>7</sup> Chris Joseph, Thomas Gunton & Murray Rutherford (2015) *Good practices for environmental assessment, Impact Assessment and Project Appraisal*, 33:4, p246

<sup>8</sup> That submission has been provided to ARTC and can be provided to this Review if needed.

<sup>10</sup> See EIS [224] ff.

community after the rail. ARTC's Social Impacts research indicates that nearly 50% of the residents of the C2K section have some kind of identified vulnerability including mental health conditions. So far as IRF is aware but there has not been an assessment made of the impact on these people of exposure to freight train noise half-hourly throughout each period of 24 hours. That is what should take up the substance of these sections.

35. At least six examples of **masking absence of content** have been provided to ARTC by IRF regarding the EIS for C2K including the impact on employment. ARTC state that there will be 620 FTE at peak for a period of a year and a half and an average of 271 FTE.<sup>11</sup> The EIS did not say that at the time there were 10,000 unemployed people in the region so the impact would not be significant. Nor did it state clearly that the significance for employment in the region would be further reduced as the workers will probably need to be skilled in things like bridge building – so presumably employees will come from outside of the region. Consequently the (in)significance of inland rail on employment in the region is masked and the absence of relevant content is arguably misleading.
36. **Framing the message in misleading ways** is evidenced by the redesign of the TOR according to its own criteria and negotiating on the basis of a particular decibel level treating all affected parties the same.
37. One of the common examples of **burying** experienced by IRF has been 'kicking down the road' to the Design Phase. In addition, in the current phase of community consultation it is critical that the information that is being withheld to the "Design Phase" is released to stakeholders in a timely manner to allow that information to be interrogated for the second round the EIS for C2K. The withholding of this information is likely to further undermine the effectiveness of ARTC's engagement over the longer term.
38. IRF is aware of only one significant change that has resulted from engagement with ARTC in the C2K section. On 27 October 2022 ARTC advised that it was replacing 7 level crossings with grade-separation structures for C2K. This is a change IRF welcomes. We are instructed, though, that development of these level crossings resulted from concerned community pressure and should never have been part of the design as standard accepted principles Australia-wide are to avoid level-crossings wherever possible.
39. It is possible to state quite succinctly that most of the usage anticipated by C2K will be by trains carrying coal that currently use existing rail infrastructure or that there is not yet evidence that delivery by rail will be faster than by truck from Gowrie to the intended delivery point. The fact that this is not done but that ARTC has that information is **evidence of burying**.
40. To disregard or replace the TOR with ARTC's own test in the way described in paragraphs 14 to 10 is, we submit, to employ tactics that are perceived by stakeholders as **consciously or unconsciously deceptive**.
41. IRF submits that the examples provided here are illustrative of ARTC's approach. That is, rather than approaching the issue objectively, ARTC determines its position and then develops its response from its predetermined premise.

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<sup>11</sup> See EIS at page 143.

## Limitations and qualifications

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42. In addition to the 7,000 pages EIS which IRF found very difficult to read there has been voluminous other material provided to, or obtained by, our client. This submission is based primarily on information supplied by our client, IRF. IRF has supplied to ARTC most of the material or comments set out in this submission and IRF can, we are instructed, supply the source material upon which it has relied if required to the Review. This firm has not checked the accuracy of information supplied. It is for the Inland Rail Review Secretariat of the Department of Infrastructure, Transport, Regional Development, Communications and the Arts to check the veracity of information supplied before it is relied upon.

## Concluding comment

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43. As the Minister, The Hon Catherine King MP observed: "Inland Rail is too important to stuff up".<sup>12</sup> Some work remains to be done if such an outcome is to be avoided. ARTC must engage with the terms of reference. A genuine cost benefit analysis that considers relevant factors in relation to C2K remains to be undertaken. The rail should proceed from Gowrie to Gladstone. If it comes down from Gowrie toward Brisbane it should not proceed beyond Ebenezer to C2K. The overarching goal of Melbourne to Brisbane in 24 hours should be rejected or at least reweighted. It submits that this goal is either the wrong goal, or overweighted. The process of selection and refinement of the route must begin by revisiting this premise. Factors that inform this submission are set out.
44. IRF submits that ARTC has failed to consult as that term is understood in development projects. It submits that there are six practices adopted in megaprojects to vitiate or reduce community engagement and evidence of
45. It is hoped that this Review will lead to that being done. IRF continue to engage as constructively as it can in consultative processes. It submits that when relevant factors are properly assessed the only conclusion that can be drawn reasonably is that the C2K section should not be built.

With Compliments



Dr Matthew Turnour

For and on behalf of IRF

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<sup>12</sup> The Hon Catherine King MP Minister for Infrastructure Transport, Regional Development and Local Government "Inland Rail independent review announcement.