

FREIGHT POLICY REFORM INTERIM DIRECTIONS	SEATS Comment – September 2024
INFORMATION and DATA	
2.3 Actions and directions for information and data	
2.3.1 Immediate actions	
1. Identify existing sources of data and identify gaps in that data for use in government policy development, for use in planning and investment by both government and industry, and for use in network management.	There is data missing in all known data bases. The voids are numerous – geographic, commodity, existing infrastructure, There needs to be a structured staged way to assemble and maintain the data. A start by identifying the “networks” at a state & national level would be good. An amalgam of players is needed to build the database – CSIRO, NHVR, T4NSW,
2. Note the owners of that identified data and where arrangements can be made to improve the sharing of relevant information for government and industry	Start by what data is publicly available – traffic counts etc Then build the commodity spread and reach agreement as to what is publishable and develop protocols
3. Identify data about the movement of goods, including modes, origin and destination and end-to-end journeys.	Expansion of comment immediately above. Industry needs to buy in and Govt needs to demonstrate a commitment to listen and determine decisions transparently.
4. Develop the data to implement recommendations 12 and 13 in Port Botany Landside Improvement Strategy Review (road and rail data for the Port Botany container stevedore landside interface)	
5. Start developing data requirements for recommendation 14 in the Port Botany Landside Improvement Strategy Review to require data about empty container parks	
6. Finalise the automated National Service Levels Standards for NSW road categorisation, including the categorisation of local roads.	Need to categorise the first/last mile of Local roads that form part of freight journey. Tie the category of “local” road with a govt funding package (\$4\$) to upgrade these assets as LG may need to be enticed to adequately build & maintain.
2.3.2 Directions	
1. Begin discussions with the Commonwealth, jurisdictions, and Transport Certification Australia, to develop a national repository of data (potentially the National Freight Data Hub) for telematics data for the purpose of providing road managers with data that would assist in network access and	NHVR; CSIRO; T4NSW; ARTC; Port Corps Develop within the telematics framework, fields for Origin; Destination, commodity type, tonnage etc that can be loaded at despatch source to be retrieved at points

<p>investment decisions. This would include having initial conversations with industry to understand their appetite to share telematics data.</p>	<p>electronically during journey as encrypted dataset.</p>
<p>2. Develop a suite of data collected from heavy vehicles in collaboration with industry, that would become the basis of a data standard to assist road managers in making better network access and road infrastructure investment decisions. Do this for NSW first and then try to get other jurisdictions involved</p>	<p>Make the process of data collection ancillary to shipment rather than a separate process. Use electronic capture of encrypted datasets from truck/train/boat/plane. Have a Uni develop the technology and transfer mechanism.</p> <p>If a dairy cow can be administered its daily medicine and feed supplements just by walking up to the dairy, data about the cargo consignment can be captured en route.</p>
<p>3. Support the national roll-out of the National Service Level Standards once the NSW work has been completed. If a national roll-out exceeds two years, then implement in NSW first.</p>	
<p>4. Consider the business case for mandating (and possibly subsidising) telematics in all heavy vehicles, using existing telematics systems where possible to inform network management and investment.</p>	<p>SEATS sees telemetry as an integral part of logistics OHS requirements. SEATS has resolved:</p> <p><i>SEATS strongly requests the Australian government ensure that within 5 years all national and state highways achieve a 95% mobile telephony reception coverage and that the rollout commence on the Monaro Highway and the Princes Highway between Sydney and Melbourne.</i></p> <p>HV movement can be monitored against schedules and fatigue management criteria. Even on less frequently travelled roads, non movement of a HV can signify an incident that may warrant investigation</p>
<p>5. Consider and discuss with industry the mandating of data sharing from road and rail operators and infrastructure managers (while protecting personal privacy and commercially sensitive data) to improve the availability of data relating to the movement of goods including modes, origin and destination and end-to-end journeys.</p>	<p>Essential for the success of the dataset use. Say, to assess the impact on roads by withdrawal of a rail link for a period, one needs to have data of enough granularity to make an assessment.</p>
<p>6. Investigate the possibility of removing the current broad constraint in contracts and agreements, including the rail access agreements, that prevent the use of key data for policy and planning purposes.</p>	<p>AGREED</p>

7. Develop a draft Ministerial Principle for data sharing requirements for rail access seekers, based on data being able to be used for policy and planning purposes	AGREED
8. Develop and implement a Data Sharing Agreement with Australian Rail Track Corporation.	AGREED and other rail track operators like Sydney Trains
2.3.3 Consultation matters	
1. In the first round of consultation there was widespread agreement that industry data was poor and not available. What particular data deficiencies were you considering?	<p>Tonnages and frequency of regular pattern of freight on rail. If rail damaged for 30 day repair, what is impact on roads, which roads and can the capacity be replicated.</p> <p>The impact of natural disasters could be more accurately predicted, giving rise to improved asset protection and resilience.</p>
2. Acknowledging that commercially sensitive data and personal data must be protected, what data would you find particularly helpful to have access to in your operations?	<p>Granularity of the data to allow better (or at least some) scenario modelling on “what if” outcomes.</p> <p>Escarpment crossing routes are all subject to instant and prolonged closure throwing freight logistics into chaos. Unless data is available in advance the criticality of the scenario cannot be assessed. Once the incident happens the industry side is 110% concerned about continuing operations rather than assessing impacts.</p>
3. Would further information sharing between others in your freight logistics chain be useful?	ALWAYS.
4. What is your view on the use of telemetry data by the NSW Government for transport planning, investment and management purposes? Would you be opposed to making telemetry use and reporting mandatory?	<p>Strong belief that this is the only way to go. Uploading the essential planning data like origin, destination, commodity type, tonnage, ... at despatch electronically would seem easier than filling out another form later.</p>

FREIGHT POLICY REFORM INTERIM DIRECTIONS	SEATS Comment – September 2024
Strategic Planning and industrial land	
3.8 Actions and directions for strategic planning and industrial land	
3.8.1 Immediate actions	
1. Transport conduct initial investigations into surplus land assets that may be unsuitable for other land uses but are suitable for freight operations.	<p>This is very important. If surplus land has a legitimate higher use THEN an equivalent area of land for freight operations MUST be found in near proximity to requirement. Landholders always seek higher yield but the need for transport logistics should be clearly recognised in the Planning gateway checklist. The current push for housing is distorting the appreciation of certain types of land use, Eg the Rosehill Racecourse is a mix of industry (both contaminating and non contamination), industrial, logistics recreation etc. If converted to Housing, where would those particular types of jobs re-establish,</p>
2. Start the process to complete the final business case and necessary steps to gazette the Western Sydney Freight Line corridor as it is currently only shown as a desired future corridor	<p>Agreed But it needs to be recognised that certain industrial activities are not suited to join this WSFL corridor. Industry in Illawarra Shoalhaven have direct rail and road linkages to Port Botany that work now. Any compulsory changes to these practices may significantly lessen the efficiency and productivity of established logistics practices.</p>
3. Through the Infrastructure Coordinator-General facilitate strategic planning to ensure Western Sydney Freight Line and Mamre Road Industrial Precinct are brought together to maximise opportunities for rail through co-location with the Western Sydney Freight Line, the potential of an inland port and investigation of a mandatory planning requirement.	Agreed, no further comment
4. Support government consideration of the future of Bays West precinct, particularly ensuring the value and unique opportunity offered at Glebe Island and White Bay are understood.	
5. Complete the economic and choice analysis component of the joint study with Queensland and Victoria that focuses at a strategic eastcoast level on the export grain haulage task. If this is not proceeding	<p>Grain(s) form a major portion of the bulk exports from Australian seaports. Grain is also freighted to other manufacturing/processing centres by rail and road. These elements need to be</p>

<p>expeditiously, complete the analysis for NSW with industry consultation so that grain can be moved efficiently using whatever mode leads to this outcome.</p>	<p>incorporated early in the analysis should NSW goes alone.</p>
<p>6. Identify guiding policy principles to inform how additional capacity, derived from introduction of digital train control, be allocated between passenger and freight services on the Metropolitan Rail Network.</p>	<p>In the metro area there are the dedicated freight lines and these corridors stand alone. There are however some freight tasks that operate on the suburban passenger network and should be allowed to continue. Experience has demonstrated that Sydney Trains does not welcome freight trains on its network. Freight train paths are difficult to secure. Longer trains are an option in the off peak hours but an upgrade to the signalling would be necessary.</p>
<p>3.8.2 Directions</p>	
<p>1. Ensure urban strategic freight land use principles that recognise freight access as a vital service (utility) be included in future planning guidelines. This includes further focus on working with land use agencies on the current Retain and Manage review, Employment Lands Development Program and a combined approach to update and review industrial lands use policy across government</p>	<p>Industrial land areas in regional NSW have generally been established wisely, quite often along rail corridors and state highways. Urban growth would appear to be of a higher priority than industrial development for some areas. The current Housing push around rail stations in many instances will be creating an objector base for future industrial expansion and freight traffic routes.</p>
<p>2. Ensure strategic planning for industrial lands supports aspirations for the 24-hour economy with minimal restrictions on hours of operation and planning for freight lands in locations that support off-peak operations to maximise opportunities for operators to move freight during the night</p>	<p>Agree 100% LG should be encouraged to enable 24/7 activity in employment zones, rather than only approving the requested spread of operating hours. NEW industrial zones should be located around freight connectivity to main roads and rail heads. Road configuration and construction principles in industrial areas should reflect the larger vehicles (HML/PBS) and heavy loads.</p>
<p>3. Develop a NSW Government master plan to ensure an integrated approach to freight logistics including embedding freight requirements into industrial lands policies, principles and plans to ensure a cohesive way forward for future growth and infrastructure</p>	<p>Agree 100% The first/last mile should be embraced by funding programs as an essential piece of logistics infrastructure.</p>
<p>4. Develop a scope for a NSW Government master plan including the need for an additional future intermodal terminal in Western Sydney, located on the Outer Sydney Orbital.</p>	<p>Generally agree in principle. Encourage IMDs in regional areas as much as possible.</p>

<p>5. Work closely with the DPHI and other relevant agencies to ensure an integrated approach to planning for employment lands and freight, including:</p> <ul style="list-style-type: none"> • reviewing industrial lands policy to ensure a future pipeline of industrial lands • developing a program to plan infrastructure servicing for the pipeline of industrial land • identifying next steps to plan for future intermodal terminal locations • investigate opportunities for inclusion of freight as a vital service (utility) and other urban freight planning principles 	<p>Agree Agree Agree Agree including where freight shares a rail line with passenger services</p>
<p>6. Prioritise progression of necessary planning, business cases and land acquisition to secure and commence development of Western Sydney Freight Line and the Mamre Road Industrial Precinct before the end of the decade.</p>	<p>No comment</p>
<p>7. The NSW Government should reconsider any plans, and carefully scrutinise any proposals, to rezone land at Glebe Island and White Bay for housing developments with a focus on protecting freight infrastructure, particularly irreplaceable port infrastructure.</p>	<p>AGREE 1000% yes 1000%</p>
<p>8. Work with the grain industry stakeholders, including growers, silo operators, rail operators and network managers, to determine the optimal end-to-end network, including rail lines, that should make up the grain network for long term investment</p>	<p>Need to include here grain processors, like Manildra Group at Bomaderry, as an important part of the transport network. Processes of this ilk are utilising full trains on a daily basis with potential to grow. T4NSW needs to be aware of these developments.</p>
<p>9. Build on the current work in identifying the corridors to provide a dedicated freight network in metropolitan Sydney and connecting to the Hunter and Illawarra, with a preference for dedicated freight rail lines moving from an implied to an explicit policy by incorporation of this into a NSW Government master plan</p>	<p>One suggestion: Reactivate the old rail bridge across the Georges River at Como and create a third dedicate freight line between Como and Sutherland. This could also benefit operation of express passenger trains (if electrified) Under the planning approval process, T4NSW operations should be notified of significant expansions which would affect rail and roads.</p>
<p>3.8.3 Consultation matters</p>	
<p>1. Will the proposed changes to planning policies and guidelines to embed freight as a utility and prioritise a focus on industrial land assist in addressing your current operational challenges?</p>	<p>This will draw attention of planners at DoP & LG to elevate transport access issues in zoning/DA considerations. As an ED practitioner, I was always frustrated at locations of ind lands with regard to main transport arteries. Quite often the first/last</p>

	<p>mile was through greenspace with no ability to recoup sales income.</p>
<p>2. What aspects of the system do you believe should be incorporated in an overarching NSW Government master plan? What role does local government play in this master plan?</p>	<p>Needed is a planning policy at NSW level that is relevant to both metro and regional areas. The need then is to instill into LG where the jobs are needing to be created and utility links to the industrial areas</p>
<p>3. Are there particular issues that should be considered in relation to Western Sydney Freight Line and Mamre Road Industrial Precinct to get the best outcomes for the state?</p>	<p>Sorry, no experience here.</p>
<p>4. Have your freight operations been impacted by retrospective changes to planning approvals by local government?</p>	<p>The current Housing push is potentially locating medium/high rise residential within the same precinct as 24/7 manufacturing industry with associated transport requirements. These transport routes have been developed by LG & industry over years and could all be challenged by an incremental DA for a manufacturing operation expansion.</p>
<p>5. For the grain industry, are there particular considerations in relation to the optimum system for the movement of grain from farm to consumer?</p>	<p>Grain from silos is usually moved in bulk by rail to ports or a processing facility. AND because of the quantities the output is also moved in bulk, maybe in a different form – dry bulk, liquids, bagged dry powder, containerised, palletised,</p> <p>The relative quantities will determine type and quantity of freight carrier. Empty vehicles or carriages then also come into play.</p>

FREIGHT POLICY REFORM INTERIM DIRECTIONS	SEATS Comment – September 2024
Skills and workforce	
4.1 Actions and directions for skills and workforce	
4.1.1 Immediate actions	
1. Map driver pathways from new entrant to highest licence class for heavy vehicle and freight train drivers.	Agree. Show various entry & exit points – bus/coach driving, suburban/regional/rural options Show retirement pathways Note: During the downturn in hospitality caused by COVID, many examples of transfers to manufacturing and logistics occurred. – More money, fixed shifts, regular hours and work was not “hard & dirty” as envisaged. Profiling the types of jobs and workplace advantages may also be advantageous. NOT all truck drivers, drive longhaul!
2. Allocate funding to expedite the Austroads recommended “driver experience” licence pathway (for progression from Medium Rigid/ Heavy Rigid to Heavy Combination and Heavy Combination to Multi Combination) as soon as practicable.	Must be in the mix
3. Identify opportunities to expedite the national reforms for rail and heavy vehicle licencing that will assist in addressing workforce shortages.	Get into schools and promote logistics as a worthwhile industry that can grant progression for good workers. Once you have the quals the job opportunities are everywhere GLOBALLY. However under 25yo are difficult to employ because of insurances
4. Publish the Heavy Vehicle Driver Pathways Research Report sharing evidence-based insights on drivers impacting recruitment and retention.	Case studies are excellent at demonstrating opportunity and satisfaction.
4.1.2 Directions	
1. Identify opportunities to work with industry to promote recruitment and training programs focused on attracting new entrants to the maritime, road freight and rail freight workforce from underrepresented backgrounds, particularly women	Create employment packages that are suitable for part time or shared roles
2. Develop a targeted skills and workforce attraction program for the freight sector aimed at first addressing roles with the most acute shortages (such as heavy vehicle drivers, train drivers and seafarers) but also recognising the longer-term demand for	Combine with TAFE, if they are receptive, to identify each occupation with likely outcome of part time or casual work and/or split shifts etc. For each of these students studying at TAFE offer a series of courses/qualifications

<p>higher skilled occupations with a particular focus on underrepresented workforces (such as women).</p> <p>This should include a funding commitment, as well as exploring other mechanisms for providing financial relief for employers (such as the existing payroll tax rebate on wages paid to registered apprentices and new entrant trainees during the eligible period of their training)</p>	<p>like truck driving/bus licence, packing a truck, basic stores person etc.</p> <p>Sell the courses to student that if they were to work in evening hospitality, they could be a casual bus driver or light truck deliveries etc. This may create interest and progression to a more regular employment role in logistics.</p> <p>If nothing else it may assist them into a community role driving a light bus to a sporting event!</p>
<p>3. Develop a skills recognition and development approach that will allow train drivers to switch more easily between networks.</p>	<p>Agreed, no further comment</p>
<p>4.1.3 Consultation matters</p>	
<p>1. Are there other actions governments should take to support industry to address skills shortages in the freight sector?</p>	<p>The economic value of the manufacturing/processing/distribution chain needs to be better explained as a value added logistic path.</p> <p>I am sure that politicians and bureacrats do not understand this. They become more worried about 2 weeks of the tourism activity being lost.</p> <p>Some case studies of the Visy waste stream, the Manildra Groups' flour chain, Sydney waste disposal at Woodlawn need to be developed demonstrating impacts on employment, services and communities if disrupted and where the skills are within the supply chain.</p>
<p>2. Please let us know what action your business has taken to address your specific skills shortage issues</p>	<p>Create employment packages around specific skill tasks</p>
<p>3. What steps can industry take together to address the skills and talent requirements?</p>	<p>TAFE partnerships see 4.1.2.2</p> <p>See 4.1.1.1 compare to other more appealing careers</p>

<p>FREIGHT POLICY REFORM INTERIM DIRECTIONS</p>	<p>SEATS Comment – September 2024</p>
<p>Decarbonisation</p>	
<p>5.3 Actions and directions for decarbonisation</p>	
<p>5.3.1 Immediate actions</p>	
<p>1 Identify how emissions data can be made readily available to industry and customers to enable the emission costs of chosen freight routes to be assessed, say in tonnes moved per kilometre.</p>	<p>Some operators know this domain extremely well and others wing it. Working with selected freight operators, over specific routes, develop up a data series to reflect cost indicators. Care should be taken to understand the route geography. One 800+km route uses 50% of fuel on 18% of journey (Illawarra Escarpment)</p>
<p>2 Identify what actions and incentives are needed to encourage the transition to zero emission and lower emissions vehicles and locomotives.</p>	<p>Important data as it also can justify transfer from road to rail and argument to allow extra trains to utilise the network May also encourage private investment in network assets.</p>
<p>3 Confirm the emissions benefit of a shift from road to rail mode on busy freight transport chain routes including those to Port Botany and intercity freight routes. 63Freight Policy Reform: Interim Directions</p>	<p>DATA allows various arguments to be made to justify changes in mode etc, additional train/rolling stock</p>
<p>4 Identify incentives that would encourage a switch from road to rail where the emission benefits are large and where a mode shift is possible.</p>	<p>But the base case needs to be known first.</p>
<p>5 Specifically investigate incentives for private investment in recharging infrastructure, including locations for such rechargers.</p>	<p>Chicken and egg!!</p>
<p>6 Complete the road Network Impact Analysis and determine the relative total asset life cost of different pavement types as zero emission vehicles increase as a proportion of the fleet.</p>	<p>Also need to consider whether route is fit for purpose of productivity gains. Many escarpment crossings were built in 1800s. However there are more recent crossings based on superior alignments that cannot gain funding support to complete as minimal benefits accrue to LV benefits. (MR92)</p> <ul style="list-style-type: none"> • SEATS strongly supports the upgrading of the Mt Ousley/Picton Rd corridor, including the works near the University of Wollongong • SEATS requests that Transport for NSW undertake a “what if” investigation on the provision of road and rail links across the Illawarra Escarpment with the view to

	<p>identifying and supporting a second east-west road freight route which can satisfy future freight requirements in most natural disasters</p> <ul style="list-style-type: none"> • SEATS shares with industry the concern that the reliability and sustainment of the key east-west escarpment freight crossings need to be prioritised by the NSW Government in its maintenance and upgrade programs.
5.3.2 Directions	
1 Continue with the actions in the Towards Net Zero Emissions Freight Policy, including implementation of the incentives identified above to accelerate uptake of low and zero emission vehicles.	However are these benefits or approvals available to entire journey, OR does weakest link undermine the use of more efficient/productive alternatives
2 Consider, with the Australian Government, imposing charges on vehicles to reflect the impact of carbon emissions. Similar charges are being implemented in other countries and their experiences should be examined.	No comment
3 Review NSW design and maintenance standards for road pavement and consider whether investment in higher standards of pavement would deliver a reduction in overall costs and improve environmental outcomes given the different pavement wear impacts that will need to be accommodated to achieve an overall reduction in emissions.	Designated freight routes in both metro and regional areas can be prioritised for upgrade/maintenance if the section can be demonstrated as a more beneficial zero carbon alternatives. In most flat road regimes there will be little difference other than by distance. For more challenging alignments (horizontal and vertical) differing beneficials may be quite significant.
4 Oversee the delivery of fit for purpose recharging/refuelling infrastructure by both government and industry and ensure these are appropriately located on the freight transport chains.	Depending on infrastructure availability, these can be located on/adjacent to high trafficked areas. Rail heads (electrified) could be good synergies for charging infrastructure

FREIGHT POLICY REFORM INTERIM DIRECTIONS	SEATS Comment – September 2024
Resilience	
6.4 Actions and directions for resilience	
6.4.1 Immediate actions	
1 Ensure freight outcomes are considered as part of infrastructure betterment when repairing or building-back directly damaged assets to better withstand future natural disasters, such as through the Regional Road and Transport Recovery Package.	<p>Essential.</p> <p>But if failure is major, and the likelihood of repeating again in the future, authorities should consider relocation or new alignment. For damaged escarpment crossings, a downgrade in capability should not be regarded as a failure if a “better” alignment receives priority funding to allow increased capability and classification.</p> <p>Example: MR73 thru Kangaroo Valley is being used less for longhaul freight. Hauliers are using larger configurations via Picton Rd to go south & west. YET a top gear MR92 escarpment crossing cannot gain a commitment from NSW to upgrade this link from Nerriga to Goulburn to be a major freight route!!</p>
2 Examine how the 2023 Sydney Trains Review’s findings and initial implementation of recommendations relating to resilience may be applied more broadly to the movement of freight by rail in NSW.	<p>Has the following happened?</p> <p>The Sydney Trains Rail Operations Agreement (ROA) and Licence, Agency and Maintenance (LAM) Deed should be reviewed to:</p> <p>61.2 Provide clear and transparent KPIs that focus on the performance of Sydney Trains as a Rail Infrastructure Manager (RIM) and network controller in order to drive service outcomes for freight and third party passenger operators</p> <p>And has the following clause been activated?</p> <p>65 The Director Freight in Sydney Trains work with colleagues in EMB and the ROC to better coordinate the planning and management of possessions and daily train control operations with their counterparts in ARTC and UGL Regional Linx.</p>
3 Support ongoing development of relevant Disaster Adaptation Plans including around vulnerable rail lines, as part of a whole-of-system proactive approach to resilience, to ensure ongoing movement of freight during an emergency while mitigating permanent modal shifts away from rail.	<p>Essential that this happens on the South Coast Rail Line (ST) and Moss Vale to Unanderra Rail Line (ARTC) considering the amount of freight carried on these lines and the alternate lack of capacity on road alternatives.</p>
4 Consider the transfer of the asset custodian responsibilities (for maintenance) for shared (operational) infrastructure, such as road over rail bridges, from Sydney trains and UGL Regional Linx to Transport to ensure	<p>No deep understanding of this</p> <p>Rail possessions need to be negotiated with freight oriented industries to minimise production limitations through lack of rail delivery alternatives.</p>

effective management and recognise these assets form critical links in the road network.	Do not just use school holidays because it has lower passenger demand.
6.4.2 Directions	
1 Network resilience and recovery from disruption needs to be built into business as usual in the long-term recognising the increasing frequency and variety of network impacts and the critical need to continue moving freight across the country.	<p>This seems to occur with routes on disrupted roads because the operators are smaller and industry more flexible at both the despatch and receipt. Costs would appear to be secondary to the sustainment of business operations.</p> <p>The larger the operation the more complicated it can get as there are a lot more variables – availability of suitable HVs, competing needs, additional distances, ...</p>
2 Plans for execution during periods of disruption as well as plans for mitigating impact and building back more resilient infrastructure should consider freight.	<p>A registry of “essential freight” needs to be compiled and examined/declared for each disruption. Items like fuel are obvious but others like water filtration chemicals; sileage to sustain dairy ops are less obvious.</p> <p>Who should keep this list? And who should make the call? What routes need to be used? Having prior arrangements is less stressful that urgent decisions needing to be made on the run.</p>
3 Work with the Australian Government on measures that can be taken to improve resilience in the interstate freight transport chains and to the ports in NSW.	<p>Escarpment crossings pose prolonged problems and disruptions.</p> <p>The bigger scenario needs to be examined for longer term solutions.</p>

FREIGHT POLICY REFORM INTERIM DIRECTIONS	SEATS Comment – September 2024
Pricing	
7.7 Actions and directions for pricing	
7.7.1 Immediate actions	
1 Review current Transport local government funding strategies including the costs and benefits of introducing local government strategic freight plans to provide more ground up approach to prioritising grant funding. This approach would also provide context for the development and implementation of the National Service Level Standards for local roads.	Local Government is not a major player in rail infrastructure provision or maintenance. Rail funding programs (Fixing Country Rail) was used by LG to improve operational assets for local industry. Note: Extension of Bomaderry home yard has been overlooked by Govt despite LG & Industry making request for over 10 years.
2 Investigate the opportunities presented in the Regional Cities NSW business case and confirm whether the approach taken with this initiative provides a good framework for encouraging a ‘one network’ approach to infrastructure investment prioritisation.	Regional areas do not participate greatly in these proposals as the major emphasis is around major cities and urban areas in non metropolitan NSW.
3 NSW Government to work with other jurisdictions to prioritise further efforts to expedite road pricing reform including the introduction of a distance- based charge for H-LZEV as a first stage of a broader introduction of distance-based charging.	No comment
4 As part of the response to the Toll Review, evaluate the effectiveness of the proposed reduction of the multiplier for smaller trucks by monitoring the temporary Truck Multiplier Rebate Scheme for the M8 and M5 East.	No comment
5 As part of the Toll Review response and implementation, undertake analysis to confirm whether heavy vehicles are currently travelling on arterial and local roads when the motorway network would be more suitable. If so, consider levers to incentivise greater use of the motorway network by heavy vehicles and also encourage more off-peak freight movements.	A deterrent for HVs to use motorways is that during peak hours the on and off ramps do not function efficiently. Backing up traffic can cause disruption in the “freeway” travel lanes eg M1 between Gwynneville and Tongara Rd.
7.7.2 Directions	
1 NSW Government to investigate with the Australian Government the potential to develop a consistent commercial framework between rail and road in circumstances where externality costs need to be addressed so that parallel road and rail corridors operate on a level playing field when externalities are taken into account.	Consider identifying “freight corridors” with lateral branches. EG grain from Central West to Pt K with variation being extension to Bomaderry.

<p>2 NSW Government should review local government funding programs as a package to identify opportunities to support ongoing maintenance activities with a more reliable and regular funding source than project-based grant funding. Grant funding should also be identified as an opportunity for delivery of freight outcomes including improved safety, sustainability and productivity</p>	<p>In many instances LG becomes the “eligible” applicant on behalf of an “ineligible” Applicant being a private sector business. Removal of blinkers required here. Surely adequate project management controls can be found outside of the government contracting arm Eg Public Works.</p>

FREIGHT POLICY REFORM INTERIM DIRECTIONS	SEATS Comment – September 2024
Ports	
8.4 Actions and directions for ports	
8.4.1 Immediate actions	
1 The NSW Government should adopt the package of 20 (of 21) recommendations from the Port Botany Landside Improvement Strategy Review and progress to implementation with a review of the changes in five years.	Supported
2 Government should identify and protect a fuel pipeline route to the Western Sydney Airport.	AGREED but in which direction is the Sustainable Aviation Fuel research going to take the requirement?.
8.4.2 Directions	
1 The NSW Government should not determine the location for a second container terminal in NSW at this stage, instead recognising Port Botany will remain the key container port for NSW for the foreseeable future.	Would seem to be the reality for the future.
2 Whilst Port Kembla and the Port of Newcastle are able to pursue the activities they wish, the government does not need to provide additional infrastructure to assist these ports develop container terminals	HOWEVER given that policy outcome, the existing paths for freight trains into Port Botany directly from Illawarra Shoalhaven (and Hunter) be preserved with growth being allowed for into the future for “whole trains”

FREIGHT POLICY REFORM INTERIM DIRECTIONS	SEATS Comment – September 2024
Rail	
9.5 Actions and directions for rail	
9.5.1 Immediate actions	
1 Develop Ministerial rail access principles – a formal policy instrument – in consultation with stakeholders.	Agree
2 Undertake a formal review of the NSW rail access undertaking, with a replacement instrument to be in place by 2026	YES and the bias by Sydney Trains for passenger services being addressed within this process.
3 Continue to increase the specification of the required level of service for the Sydney Trains network, including developing and refining performance measures and targets.	Strongly agree. The large proportion of freight on MRN is destined for export through Pt Botany earning valuable export \$s for the Nation.
4 Consider measures to improve coordination between the networks, including opportunities to align service levels and performance measures	To move forward and have Freight trains utilise more of the MRN innovative solutions need to be found. Ideas like running 1200m trains thru the MRN late at night under a revised signal system.
5 Work with industry to identify options within the Metropolitan Rail Network for breaking down longer trains to 600 metre consists dedicated to particular stevedores.	Agree. Investigate having the breakdown on siding closer to Pt Botany so that advantages of utilising a 1200m set on sections of single track and more frequently used sections of the MRN can be achieved. Ideas like running 2x600m sets jointly that can be halved when required closer to destination.
6 NSW Government support establishment of an industry-led port supply chain coordination body, to be chaired by an independent expert to identify opportunities to develop a collaborative approach to the port rail task	Strongly agreed
7 Review the current operating and contracting arrangements for the Country Regional Network to ensure they adequately focus on coordination between networks and include appropriate service level measures. As part of that examine the intent and performance of previous arrangements for the management of the network.	Co-ordination amongst freight “owners” that put like with like wherever possible for whole journey.
9.5.2 Directions	
1 Undertake a review of the NSW rail network with a view to consolidation and closure of disused and under-utilised rail lines to target funding to the remaining priority networks.	Agreed but never like to see closure of working rail lines.
2 Reduce complexity of the rail system with less network managers, increasing harmonisation between networks and access	This noble aspiration is supported

<p>arrangements, and more strategic rail planning. Including investigation of long-term options for operating the Country Regional Network with the aim of moving to the model that best delivers a fully coordinated rail network, the highest possible service levels and value for money.</p>	
<p>3 Work to enable the provision of saleable, end-to-end rail access – a cycle that includes a timetable path from an intermodal terminal to the port, a window at the port and a timetabled path from the port back to an intermodal terminal</p>	<p>Also examine IMD to IMD as it may not be a port but a processing operation. These do exist in Country NSW!</p>
<p>4 Ensure a 600-metre port rail shuttle system is in operation within a reasonable period, approximately five years. If not, move to mandate operating arrangements, potentially through market redesign.</p>	<p>With options closer to Port than depots in western Sydney for those freight tasks that do not travel near to Moorebank.</p>

Some other pertinent extracts from the SYDNEY TRAINS REVIEW 2023 – Final Report

- In discussions with the Panel during this Review, freight operators acknowledged that the principle of “reasonable passenger priority” is warranted. However, they argued that the principle is not defined or explained in the Access Undertaking or any other guidance provided by TAHE. In the absence of any policies or protocols setting out what “reasonable passenger priority” means in practice, the freight sector is of the view that access is unreasonably skewed towards passenger services
- The Panel is of the view that Sydney Trains should not be the entity with accountability for negotiating access agreements with access seekers. However, the entity that provides access to the MRN must have the ability to set performance targets for Sydney Trains in order to deliver the service levels agreed with third party operators
- Freight operators advised the Panel that the lack of transparency in planning for the future of the rail network, particularly on the shared corridors in Sydney, was a significant impediment to their willingness to invest in new rail freight rolling stock
- TfNSW estimates that every 1,200 metre freight train takes around 100 trucks off NSW’s roads. While the heavy trucking industry is moving toward green energy alternatives and is investing in increasingly safe vehicles, rail remains a safer and more energy efficient form of transport.

FREIGHT POLICY REFORM INTERIM DIRECTIONS	SEATS Comment – September 2024
Road	
10.4 Actions and directions for road	
10.4.1 Immediate actions	
1 Finalise the NSW Heavy Vehicle Access Policy based on specific feedback received on the draft policy and progress to implementation.	Seems logical It should be noted that higher productivity vehicles will not be permitted on most escarpment crossings in NSW. Where escarpment crossings exist that can enable HML/PBS vehicles, steps should be taken to upgrade and regularise these as future freight routes – MR92 & Imlay Rd.
2 Commence planning and delivery to address key restrictions identified through heavy vehicle access prioritisation, including: <ul style="list-style-type: none"> • the connection between the new M8 and Port Botany • rest stops • replacement of restricted bridges such as Sheahans Bridge on the Hume Highway • realignment of Moorebank Avenue 	Address other similar issues regarding bridge structures that restrict higher productivity vehicles. Progressively address the issue and find solutions, if required. NOTE that hauliers are already determining their priorities and purchasing higher performance configurations and in doing so adding KMs to the distance if returns warrant it. Two such roads are managed by NSW Forests (Imlay Rd & Edrom Rd) in south east NSW.
10.4.2 Directions	
1 The NSW Government should prioritise its commitment to the National Automated Access System (Heavy Vehicle Access Management System) in partnership with other jurisdictions.	No comment but freight does move across state boundaries, probably more times that people would think.

SEATS (South East Australia Transport Strategy)
<https://seats.org.au/> or admin@seats.org.au or 0402 571782

Greg Pullen, Executive Officer, SEATS.

September 2024