

Rick Banyard



IPART

ipart@ipart.nsw.gov.au

Dear Sir,

I wish to make a submission to the rail access charge review.

As a very involved community representative I wish to raise a number of points that seem to have not been considered.

I also wish to be placed at the table as a community stakeholder. It would have been appropriate for this to be held in the Hunter eg Lake Macquarie Council Chambers or an Adamstown venue.

I consider that the IPART Tribunal would benefit significantly from a site inspection at a location like Adamstown as clearly the rail line is not a coal only rail line. I would be happy to assist with organising a venue and site inspection sites.

The points are:-

1. Motive power.

The calculations used are based on the operation of diesel locomotives when the section of the rail line in question is electrified. Electric powered locos have a different cost of operation and have a very different environmental cost as there is no loco diesel emissions. It is unreasonable for operators to be paid for using inferior equipment.

2. Load specification

The access charge is a fee to use the rail line for the carriage of coal however there is no specification for that task. It is very well known that coal trains have high pollution levels due to the coal hauliers failing to secure their loads. It is estimated that in the order of 300 kg of coal falls from or is blown from each train during their journeys. This has a very negative impact on human health, on the environment and on the region's rivers and streams.

The access charge must spell out the base standard and the charge must reflect and enforce the compliance with the standard. Where a journey sheds coal along the corridor a set of penalty charges should be added to the base charge. IPART should set these penalty charges as part of its determination.

Specifications should state the wagon weight, dimension, security of load, emission levels and other relevant factors.

3. Comparison with other operators

Coal hauliers are not the only operators that uses the rail lines. Passenger, freight, grain and other trains share the track.

The charge to these other operators should be set at the same time as the coal hauliers charge is determined.

If the fares deliver an unequal revenue to the ARTC then there may be an desire to favour that form of cargo that delivers the greatest revenue. That would not be good for the economy, from encouraging the use of rail instead of road or the social infrastructure.

4. Two way charge

A load of coal transported to the port or other destination is not a one way trip. Each loaded trip has an equal unloaded trip thus each load transported is double the distance. The access charge must cover both trips.

5. Quantity of Activity

The determination would seem to only consider the annual costs and annual revenue. It makes no reference to the coal carried in the corridor. This does not seem reasonable. The access charge should be based on a unit. Eg tonne carried.

The cost in the draft determination would seem to be for the coal network and not just the section in question.

There does not seem to be any reasonable calculations to show how each rail users share was determined.

The cost of environmental harm (eg health harm costs) to the community does not seem to have been calculated and charged to the coal hauliers.

6. Time Charge

In general coal trains travel very much slower than for example passenger trains.

They are also very much longer and thus occupy the track for much longer periods of time.

I would suggest that there is a good basis for the access charge to be time based.

I thank you for the opportunity to lodge a submission into this very important monopoly charge.

Rick Banyard