

Submission to the National Land Freight Strategy Discussion Paper Feb 2011

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Introduction

I am very pleased to have the opportunity to make this submission to the NLFS Discussion Paper.

The task given to Infrastructure Australia (IA) of developing a genuine National Land Freight Strategy, is fundamental to Australia's future, in more ways than the important obvious transport and productivity/economic aims.

Longitudinal critical analysis of Australia's land transport development and directions provides a picture of a rudderless national land transport system, still stuck in the thinking and actions of the 1950s.

In short, the system is pursuing unachievable goals via unsustainable approaches that are not affordable, and are inherently unsafe, based on incomplete, inadequate and sometimes incorrect data.

The efforts of IA to clarify and give direction to the future of national land freight in the face of competing, often conflicting priorities, insufficient funding and incomplete and inadequate data is really extraordinarily courageous. Funding, "cost-shifting" and other issues between the three levels of government are alone a major barrier to effective change, despite any rhetoric to the contrary.

The National Transport Commission use the analogy of "herding cats" in turning 'silo mentality' and 'patch protection' into national interest thinking and decisions.

My key concerns with the draft NLFS (The document is titled a "NLFS Discussion Paper" but referred to by Minister Albanese as a "Draft National Freight Strategy"), are:

That it gives all the appearances of continuing with critical aspects of previous approaches that are fundamentally unaffordable and therefore unachievable and not in the national best interest.

That if these directions are pursued, there would be detrimental economic and social consequences through the impacts on other key aspects of national land transport, particularly road safety.

Given that context, my key recommendations to IA, are:

That before the NLFS can be created, IA brings together a "round table" working group of key stakeholders (as detailed below) to lay out these problems openly so that their full implications can be considered and directions considered from that additional knowledge.

That before a final NLFS can be created, a tandem or parallel strategy needs to be made for targetted reductions in motor vehicle travel, including truck freight movements, with a particular focus on modal shift of freight to rail, and private car user to public transport, including rail.

Further details on those key concerns and key recommendations are as below:

Key Concerns

The draft NLFS gives all the appearances of continuing with critical aspects of previous approaches that are fundamentally unaffordable and therefore unachievable and not in the national best interest.

That if these directions are pursued, there would be detrimental economic and social consequences

through the impacts on other key aspects of national land transport, particularly road safety.

Map (#4) in the draft NLFS "indicative national land freight network" includes "parallel" rail and road links along major corridors. This and text items indicates that the NLFS will generally continue the outdated and costly road-rail competition rather than co-ordinated integrated intermodalism.

While this might meet ideological-based road-rail competition policy demands, and may benefit some industries and hauliers, it will have detrimental economic and social consequences on other key stakeholders, including the public purse, public health and workplace safety. (The last because road freight transport is already the most dangerous workplace in the nation).

The Australian Transport Council (ATC) says *"Australians want a national transport system that is safe and secure, efficient, competitive and integrated, sustainable and reliable and which supports and enhances the nation's social, environmental and economic prosperity"*. (ATC)

We have had more than half a century of road-rail competition on interstate routes. If competition was effective and affordable, we should see the benefits in terms of high standard infrastructure, efficient integrated operations, mobility, and safety.

Yet, close inspection reveals a rail system still fundamentally running on 19C alignments, on underweight rails, and often poor roadbed infrastructure, and a road system that is extremely degraded, unsafe and mobility/operationally deficient, with poor coordination and relatively little integration between the two modes.

At the same time, competition between the modes still over-rides safety, fuel use and emissions issues.

Governments and the National Transport Commission (NTC) give in-principle shift of freight from road to rail for the good reasons of benefits to reduced emissions, fuel use and traffic congestion, as well as reduced risk of and actual harm from road crashes.

The looming \$20 billion per annum costs of urban congestion and current 1500 deaths, 32,000 injuries and \$30 billion plus costs of road crashes as well as the future of global warming and peak oil are economically and socially expensive standout reasons for change.

However, a case by case study of land transport issues around Australia finds repeats of the completely opposite situation.

For example, the nationally agreed to "Safe System" approach to road safety has as key planks, "Safer drivers in Safer vehicles on Safer roads". Somewhere in the transition from the National Transport Plan to the linking with the National Road Safety Strategy (NRSS) the importance of modal shift to rail became a watered down "encouragement" rather than any real targets and strategy.

And while the Federal and states governments, NTC, and the trucking lobby enthusiastically support increased truck size and payloads for "efficiencies" and reduced exposure to risk via fewer truck numbers (fewer in theory at least), these "Higher Productivity Vehicles" are too often being introduced on roads that are safety and operationally/mobility deficient, rather than the claimed "safer" roads they are supposed to be matched with.

Even when roads have been known to be safety and operationally deficient for decades, with no funding allocation for the needed upgrades, higher productivity vehicles are still being introduced, creating a situation of "one-dimensional" road safety, not a systems approach.

At the same time, freight is still allowed to be shifted from rail to these roads 'competitively' as though this is somehow good for the nation, and for the ATC/community national aims as stated above.

Rather than removing older purportedly less safe trucks from the roads, the evidence shows freight being gained from rail, putting more trucks on roads, with older trucks redeployed, often to less safer roads.

In too many cases, demands for road bypasses and upgrades have become the 'default' consideration, even when there is a safer rail line with ample capacity almost parallel.

Even more concerning is that in these cases, studies of opportunities to shift freight to rail, and the actions to facilitate that, are as rare as square circles. Federal, states, local government and even the rail industry itself are not making or requesting these studies that should be fundamental.

This is despite the fact that demands for new roads, replacement, upgrades and maintenance far outstrips funding allocation, shown clearly by roads being acknowledged as unsafe and outdated, yet still awaiting funding after twenty years and more.

Yet the vital roads data isn't available from government sources. That includes taking the costs required to lift roads to "Safe System" standards, added to the mobility/operational needs and related costs (upgrades, bypasses) etc, for which there are demands all around the nation. Estimating those figures from non-government sources, and adding that to maintenance and replacement needs estimates draws the conclusion that tens of thousands of kilometres of roads will be awaiting funding beyond 2020, and out to 2030.

Given that 85% approximately of funding is for mobility rather than safety needs, we just are not going to meet "Safe System" requirements by 2020, and most likely by 2030.

Considering this in light of the growing freight and passenger task does not give great hope for seeing this "safe, efficient" etc transport system in my lifetime.

Evidence indicates that increased funding for freight routes will have some safety benefits, but that will be less than funding spent on targeted safety needs.

Key Recommendations

That before the NLFS can be created, IA brings together a "round table" working group of key stakeholders (as detailed below) to lay out these problems openly so that their full implications can be considered and directions considered from that additional knowledge.

That before a final NLFS can be created, a tandem or parallel strategy needs to be made for targetted reductions in motor vehicle travel, including truck freight movements, with a particular focus on modal shift of freight to rail, and private car user to public transport, including rail.

We do know that reducing motor vehicle has road safety and other benefits, as mentioned below:

"Encouraging alternatives to motor vehicle use has the potential to reduce exposure to road trauma, as well as achieving environmental and health benefits. This requires:

- *land use planning that reduces the amount of transport necessary for people and goods;*
- *transport planning that integrates transport systems and improves the quality and effectiveness of transport";*
- *expansion of telecommuting and other measures that avoid the need to travel; and*
- *promoting the benefits of public transport, walking and cycling.*

(House of Representatives Standing Committee on Transport and Regional Services; National Road Safety - eyes on the road ahead; The Parliament of the Commonwealth of Australia, Canberra, June 2004. pp15)

Keeping truck traffic growth down by applying the latest technology to improve productivity and safety is a high government priority given the predicted doubling of freight volumes by 2020 (NTC 2005)

There is compelling evidence that individual transport stakeholders understand different aspects of the kinds of barriers mentioned above, but that some incomplete and incorrect information, and some unshared information acts as a barrier to complete understanding of the 'big picture' which is surely what IA and the NLFS are all about. It is fair to say that denial of some issues and 'wish-listing' of the unachievable are involved in skewing the big picture.

Some key issues in that regard are mentioned above. A additional glaring example is that Higher Productivity trucks are used on safer roads. This fallacy has been passed from agency to agency. Only 15% of freight is contestable between rail and road is untested theory, but is taken as fact too often.

Higher productivity vehicles are safer is unproven. Some research plus anecdotal research indicates that larger trucks produce higher severity outcomes in crashes, yet this is ignored.

When Higher productivity trucks are used in lieu of rail through via 'competition' or rail service cessation, line closure etc net productivity and net safety gains are less than if rail was used.

My suggested list of invitees to a round table includes, but is not limited to the following:

- Infrastructure Australia (IA)
- Australian Local Government Association (ALGA)
- National Transport Commission (NTC)
- Australian Logistics Council (ALC)
- Australasian Railways Association (ARA)

Given my unique understanding of some issues, I would like to speak to the round table.

In summary, there is compelling evidence that the directions the NLFS would take Australia, as a component of the national land transport system, are not fully achievable, are not affordable, and consequently will not optimise the outcomes in terms of safety, efficiency, fuel economy and environmental outcomes.

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