



FREIGHT AND LOGISTICS COUNCIL OF WESTERN AUSTRALIA

Mr John Austin
Infrastructure Australia
GPO Box 594
CANBERRA ACT 2601

Dear Mr Austin

National Freight Strategy

Thank you for the opportunity to comment on the first concepts draft on this important national issue.

The underlying focus of the issue is national infrastructure funding for freight activities, with an important but supplementary focus on policies aimed at more efficient asset utilisation and management.

The Council is supportive of this focus because we recognise the fundamental role that sound national planning policies and planning processes play in the provision and use of infrastructure that benefits the nation as a whole.

The draft usefully establishes the genesis of a set of national objectives, policies, principles and processes which could be used to oversight the provision of freight services in this country and, in particular, the infrastructure required to underpin them.

We are, however, wary about the notion of a national freight network as the basis for those infrastructure funding decisions.

The reality is that the Western Australian freight network is, in essence, no more a part of a national freight network than is its Tasmanian counterpart. Unlike, for example Victoria and New South Wales, we in this State do not in large measure have cross-border freight activity with the inherent risk of duplicated or 'disconnected' investment. Overwhelmingly, Western Australian freight activity occurs within Western Australian borders and across a very small number of designated cross-border road, rail and port links.

Thus, we are unconvinced of the need for a national approach that attempts to coordinate and plan consistent freight responses from one side of the country to the other.

It seems to us that a more realistic and useful approach would be to develop the policies, principles and processes that the draft includes and use these as templates against which national infrastructure system management and funding decisions are taken, irrespective of where these are to be applied. We believe such an approach would result in better outcomes for all States and industry alike.

We would be keen to participate in that process of development. The draft is a useful first step. To progress it from here, we would see additional attention being given to such issues as the importance of whole-of-supply-chain considerations, the strategic contribution and cost impact of last-mile activities and the role of local government in facilitating good freight outcomes.

To these suggestions, we would add the points made previously to you, namely the need for a new approach to related benefit cost analysis, the importance of risk management when it comes to corridor encroachment and the fundamental requirement for long term planning as the basis of related infrastructure decision-making.

The draft's reference to national funding of road infrastructure we saw as encouraging, particularly given that the Council is currently discussing related aspects of the Western Australian road network. For this State, in particular, adequate roads are a fundamental necessity for the provision of efficient freight services.

In developing the discussion on road funding, we believe that there needs to be a full discussion on the balance of revenue collected and expenditure made, some further thought given to the extent of the network under discussion and whether the application should be focussed on dedicated or common user routes.

In conclusion, the Council believes that the first concept draft represents a promising start on defining a more structured approach to national infrastructure funding for the freight industry. There is clearly considerably more work to be done on developing the approach and we would encourage the widest possible consultation, especially with industry, as that process progresses.

We are grateful for the opportunity to make this brief comment and look forward to being involved in further related discussion.

Yours sincerely



Bob Pearce
Deputy Chairman

21 / 5 / 2010