

NSW Grain Freight Review Call for Submissions

About the review

Purpose and Terms of Reference

The NSW Grain Freight Review has been commissioned and funded by the Australian Government.

The purpose of the Review is to examine the grain freight supply chains considering institutional, governance and accountability arrangements (both public and private); and competition, pricing and asset management aspects of the NSW grain freight task.

Having considered these matters, the Review's chairperson is to develop advice and recommendations with a view to identifying how best to ensure the most appropriate modes of transport are used to move grain efficiently through the supply chain to enhance its long term sustainability.

Terms of Reference

In undertaking its assessment, the NSW Grain Freight Review is to provide a short, medium and longer term appraisal of the domestic and export grain supply chains in NSW in terms of the grain markets that they serve with a view to identifying some long term sustainable opportunities that may lead to increased efficiencies. This assessment will, by necessity, take account of the recent changes to wheat export marketing arrangements provided for in the *Wheat Export Marketing Act 2008*.

Specifically, the Review is to have regard to:

- the grain supply situation in NSW in terms of cropping patterns, densities and innovations (e.g. new grain types, farming practices, and the increasing provision of on-farm grain storage), and the likely impact of climate change¹ in terms of short, medium and long term trends for the grain industry.
- the market demand situation for NSW-produced grain, examining in detail the domestic and export sectors with their multiplicity of customers and niche grain requirements, including considering the likely impact of the *Wheat Export Marketing Act 2008* on both market sectors and the supply chains separately serving those sectors in terms of short, medium and long terms trends for the grain industry.
- the capacity of the grain supply chain infrastructure to service the domestic and export markets in terms of the various transport options currently available to growers and service providers, including: examining the level of access, pricing, and competition; considering the nature of ownership, management and investment in the grain supply chains' physical assets; as well as competition for available locomotives and rolling stock and available track slots with the coal industry and other sectors relying on bulk freight transport and handling.

1. The intention is not to undertake new detailed analysis of the likely impact of climate change on grain production but to distil any existing analysis.

In making its recommendations for future sustainable arrangements for the NSW grain freight supply chains, the Review's Chairperson is to have regard to:

- the role of road and rail modes of transport in NSW for both non-port haulage of grain and haulage to ports and the extent to which these roles are affected by any concentration of and/or vertical integration of ownership, pricing, access and competition aspects at various stages of the domestic and export grain freight supply chains;
- the efficiency of the current access, regulatory and institutional arrangements covering the transport of grain in NSW;
- opportunities that may lead to increased efficiencies, flexibility and sustainability through reshaping the domestic and export grain supply chains through:
 - strategic investment in fixed rail infrastructure (e.g. track upgrades) and rolling stock, while at the same time maintaining a balance between the needs of growers and the needs of service providers;
 - examining road sector chain of responsibility issues that are now emerging; and
 - examining the efficiency, pricing, access and competition aspects of the handling and storage facility operations at Newcastle, Port Kembla, Melbourne and Brisbane seaports for NSW grains bound for export markets;
- how to best facilitate the grain freight industry's response to emerging market demands, including considering the appropriate role of governments vis-à-vis possible proposals for private/public investment to address any existing and/or emerging infrastructure bottlenecks, whilst also taking account of environmental and social externalities;
- potential new rail freight opportunities that could reduce rail's dependence on seasonal grain freight flows; and
- the roles and responsibilities of the grain industry, freight operators, handling and storage operators, the NSW Government and the Australian Government with respect to managing future institutional, governance and accountability arrangements to bring such opportunities to fruition in the context of on-going domestic and international competition and economic change.

Chair and Taskforce

The Chair of the NSW Grain Freight Review is Mr Des Powell.

A high level Task Force comprising key industry and government groups has been appointed to advise and support the work of the Review. Membership of the Taskforce is as follows:

Peter Flottmann	Chief Executive Officer Grain Growers Association
Richard Clark	Senior Vice President NSW Farmers Association

Neil Johns	Chief Development Officer GrainCorp Operations Ltd
Sasha Grebe Matt Watt (alternate)	Government Relations Manager Freight Manager AWB Ltd
Simon McNair	General Manager Australian Bulk Alliance & representing ABB Grains Ltd
Chris Raeburn	Operations Coordinator, Grain El Zorro Transport Solutions
Helen Newell	Director, Corporate Development & Government Relations Asciano Ltd
Alec Mackenzie	General Manager, Country Regional Network/Services Australian Rail Track Corporation
Alex Claassens	NSW Divisional Secretary, Locomotive Division Rail, Tram and Bus Union
Richard Connors	Senior Policy Officer, Roads and Transport Local Government Association of NSW and Shires Association of NSW
John Campbell	General Manager Manildra Flour Mills
Luke Fraser	Executive Director Australian Livestock Transporters' Association
Jim Glasson	Director-General Ministry of Transport, NSW
Carolyn McNally	Executive Director, Infrastructure Investment Department of Infrastructure, Transport, Regional Development and Local Government
Allen Grant	Executive Manager, Agricultural Productivity Department of Agriculture, Fisheries and Forestry

Reporting timeframe for review

The Chair will submit a final report to the Commonwealth Minister for Infrastructure, Transport, Regional Development and Local Government and the NSW Minister for Transport by the end of May 2009.

Background

Policy Context

This Review will be informed by the relevant policies of both the Commonwealth and NSW Governments and will draw on a range of work undertaken by governments and industry over recent years to examine the grain supply chain.

Significant among these investigations is the work of Grain Infrastructure Advisory Committee (GIAC) which was established by the NSW Government in 2003 to make recommendations on the retention and upgrading of restricted rail branch lines, or the relevant road alternatives, for the transport of grain in NSW.

The GIAC report of January 2004 identified:

- Five “restricted” branch lines where it considered the cost of upgrading would be significantly less than the cost of potential road alternatives;
- Seven “restricted” branch lines where it considered that there was still some uncertainty surrounding the data and that pending further consultation with industry and regions over the ensuing harvests, should remain operational; and
- Three “restricted” branch lines where it considered the cost of upgrading would be significantly greater than the cost of potential road alternatives.

The NSW Government subsequently suspended services on four branch lines and announced funding of \$69 million (over three years) to keep the remaining eleven restricted grain lines open while a longer term approach was developed with industry.

The current Review is expected to inform that longer term approach. It will also take account of the significant developments for the grain industry which have emerged since that time, including:

- The commencement of the *Wheat Export Marketing Act 2008* on July 1 2008, which deregulates the export of bulk wheat from Australia by ending the single desk arrangement after more than 70 years of operation.
- The commencement of a new rail safety regime in NSW under the *Rail Safety Act 2008* on 1 January 2009.
- The expiration of the NSW Government’s original five year agreement (2002-2007) with Pacific National (Asciano) which provided for branch line grain haulage services and capital investment by the operator in rolling stock and grain storage facilities. In December 2007, Asciano announced its decision to cease branch line services.

- The negotiation of a new agreement² between the NSW Government and Pacific National (Asciano) which continues branch line grain haulage services until 30 June 2009, requires Pacific National to upgrade certain locomotives for grain haulage use and transfer 18 locomotives and 180 grain wagons to a nominee of the Director-General of NSW Ministry of Transport, being a new operator of branch line grain haulage services. A new operator is currently being sought via an Expression of Interest process by the NSW Ministry of Transport.
- The NSW Mini Budget (11 November 2008) which announced that up to five grain branch lines would be suspended from operation. A decision on which lines has yet to be finalised.

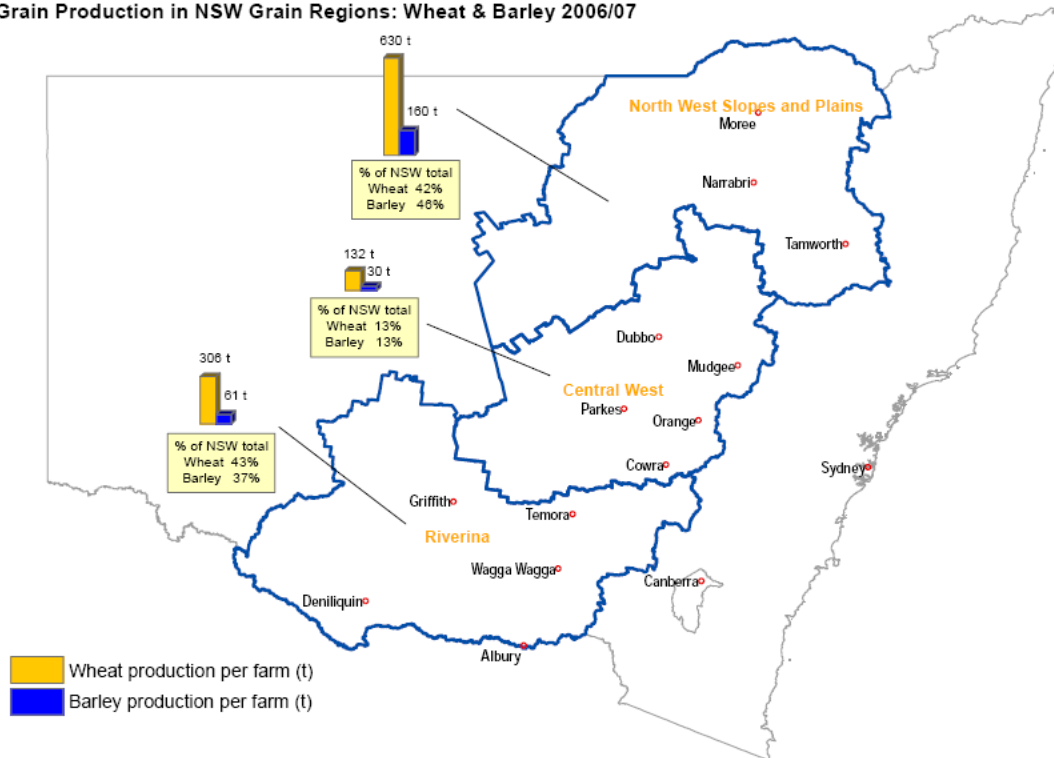
In light of these developments this Review of NSW grain supply chains and opportunities for long term sustainability is extremely timely. The Review was announced by the Hon Anthony Albanese, MP, Minister for Infrastructure, Transport, Regional Development and Local Government and the Hon Tony Burke, MP, Minister for Agriculture, Fisheries and Forestry in a joint statement on 20 October 2008.

² This agreement is called the New Works Deed and can be viewed at www.transport.nsw.gov.au/rail/New-Works-Deed.pdf

Grain Industry

This section provides a brief snapshot of the NSW grain industry.

Figure 1
Grain Production in NSW Grain Regions: Wheat & Barley 2006/07



Source: ABARE

The grain industry includes farms engaged in growing wheat, barley, and other cereal crops, pulses and oilseed crops. NSW's grain industry annual production varies widely depending on rainfall as illustrated in Table 1 below. The NSW Department of Primary Industry forecasts winter crop production at just over nine million tonnes for the 2008-09 season.³

Table 1: NSW winter crop production ('000 tonnes)

2000-01	2001-02	2002-03	2003-04	2004-05	2005-06	2006-07	2007-08	Average
9,956	10,140	3,109	9,681	9,766	10,393	2,680	3,391	7,390

Source ABARE commodity statistics

Growers supply both export and domestic markets, with the main domestic demand stemming from millers (such as Manildra, Allied, George Weston), feedlots and stockfeed outlets. Grain is also used in ethanol production. The main feedstock for ethanol production is a by-product of the milling process, although some sorghum is also used.

³ NSW Grains Report, December 2008.

Compared to levels of production and export, domestic consumption of grains is relatively stable. In recent years, the domestic/export market split for NSW grains has been roughly even. Domestic consumption is increasing in line with population growth and the growth in feedlot numbers. There is also evidence to suggest that with ongoing water shortages and increasing water prices, dairy farmers in drought stricken areas of the country are increasingly moving from pasture to grain fed herds, in turn increasing demand for stockfeed.

Some of the main domestic consumers of NSW grain are identified in the Table below.

Table 2 – Key domestic consumers

Company	Locations
Manildra – Flour Mills	Manildra, Gunnedah & Narrandera
Manildra – Starch plant	Bomaderry/Nowra
Allied Mills	Picton
George Weston	Enfield
Ben Furney Flour Mills	Dubbo
Joe White Malting	Tamworth
Barrett Burston Malting	Thornleigh
Cargill	Newcastle/Kooragang
Ridley	Mills in Tamworth & Taree, distribution also in Wetherill Park
Coprice	Leeton
Swift /AMH (Feedlots)	Caroona (Liverpool plains), Prime City (Riverina) and Mungindi
Elders	Killara
Cargill Beef	Wagga Wagga
Rangers Valley Cattle Station	Glen Innes
Rockdale Beef	Condobolin, Yanco
Inghams	
Bartter Enterprises	Griffith, Beresfield
Baiada Poultry	Sydney, Tamworth
QAF	Corowa, Bungowannah and Balpool.

NSW's main export wheat markets include the Middle East and New Zealand and, increasingly, parts of Asia such as Taiwan, Vietnam and Indonesia. In the last good harvest year for NSW farmers (2005-06), grain accounted for an estimated 25% of NSW exports by value. Grain is Australia's fifth largest export commodity by value, worth \$5-7 billion per year depending on seasonal conditions and the prevailing price.

The area under crop has expanded more significantly in NSW than the other grain producing states, generally moving westward due to improved cropping and moisture conservation practices, and the development of more suited varieties. The future of grain production may also see an expansion into higher rainfall zones with the development of higher yielding winter wheats, principally for feed grain purposes.

Grain Supply Chains

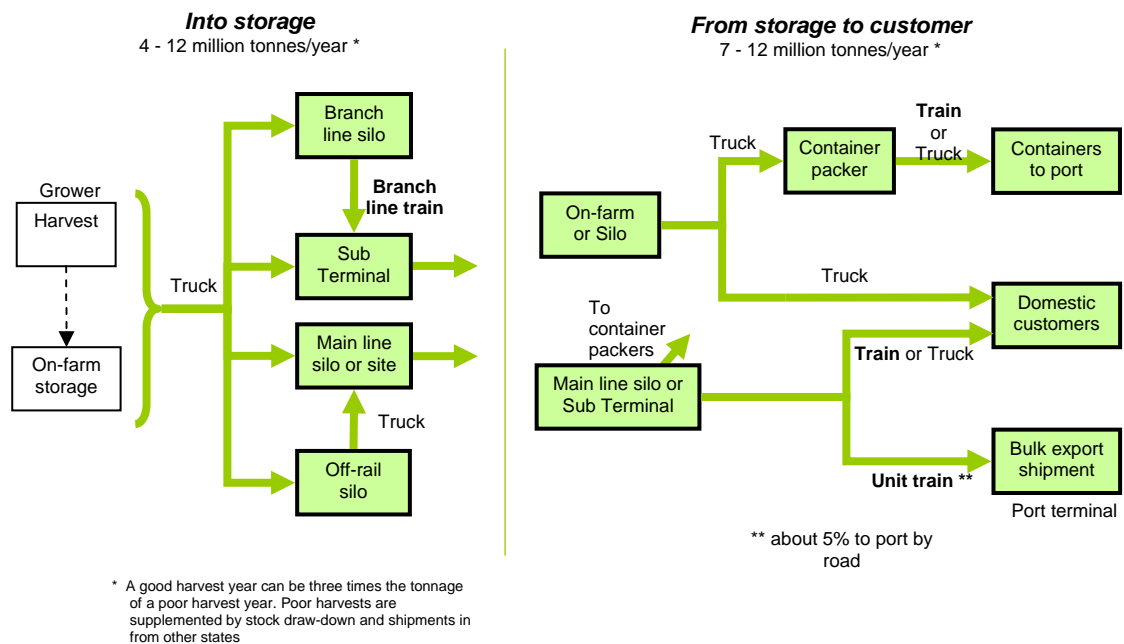
The grain supply chains connect growers to domestic or export customers and include bulk handling companies like GrainCorp and AWB; transport operators like Pacific National, El Zorro and individual trucking firms; and export port operators – to name just a few of the key participants. There are thousands of growers throughout the three main grain regions in NSW, and customers are dispersed across eastern Australia and, as noted above, throughout the Middle East, Europe, Asia and the Pacific.

According to recent analysis for the NSW Department of State and Regional Development and the Freight and Logistics Council of NSW⁴, grain supply chains operate in two main steps as illustrated in the diagram below:

- harvest flows from farm to up country storage, then
- demand-driven deliveries from storage to customers.

⁴ SAHA and Portland Group, Four key Supply Chains – Opportunities for Innovation – Grain Sector, Final Report for the NSW Department of State and Regional Development, November 2008.

Figure 2 – NSW grain supply chains



Source: SAHA, Portland Group, November 2008

Consistent with broader transport trends in Australia, more and more grain is being transported in NSW by road throughout all parts of the chain with the exception of bulk export shipments. It has been noted that traditional single desk selling arrangements had been well suited to the railway operators, as they consolidated large volumes into a single customer relationship.⁵ For this reason, with the greater fragmentation of the grain supply chain expected as a consequence of export deregulation⁶, the trend to road may well intensify in the future.

Grain supply chain costs are high compared to many sectors and constitute between 15-25% of sector revenues. There have been conflicting trends in some parts of the chain – for example, in storage and handling the movement of grain has been increasingly concentrated through fewer receipt and transfer points to capture economies of scale while at the same time, the types of grains grown are diversifying and these varieties often require increased segregation in storage and handling.

A combination of significant annual variability in grain production and physical constraints along sections of the branch line network (ie, severely degraded sleepers, which have the effect of limiting axle loads to a maximum of 19 tonnes and average train travel speeds to around 20kms/hr) has resulted in high rail transportation costs.

From a train operator perspective, the relatively low level of locomotive utilisation for grain haulage purposes is a major issue since the opportunity cost of having

⁵ Sd&D, Single Vision Grains Australia, Transport Infrastructure issues Paper Two: Commercial Aspects of the Australian Grains Industry January 2007.

⁶ There were twenty one accredited wheat exporters under the new Wheat Export Marketing Act 2008 as at January 2009.

expensive locos sitting idle is high. This has seen some operators increasingly enter into 'take or pay' grain haulage contracts (in order to mitigate demand risk) and/or transfer under-utilised locos to other higher and more consistent demand traffics, such as coal.

Although much has already been achieved over the last decade in reducing supply chain costs, clearly there is scope for more to be done.

Efficient supply chains are essential to increasing grower returns and the overall growth and sustainability of the grain industry into the future. Efficiency can be influenced by many factors:

- the condition of the infrastructure,
- competition between operators and modes of transport,
- transfer operations across road, rail and port (eg. load and unload times),
- the capacity of different sections of the road or rail network (eg. train path constraints or designated routes for Higher Mass vehicles),
- training of staff and the flexibility of labour arrangements,
- the degree of integration and/or collaboration across the chain components.

Infrastructure Ownership and Management Arrangements

Rail Infrastructure

There is a complex set of ownership and management arrangements applying to the Country Rail Network (CRN) in NSW. These are summarised in the following Table.

Table 3 – Roles of key agencies in NSW rail infrastructure

<p>NSW Rail Infrastructure Corporation (RIC)</p>	<p>Established in 2001, RIC effectively owns the NSW CRN on behalf of the NSW Government. Its principal objective is to ensure that those parts of the NSW rural network under its responsibility enable safe and reliable passenger and freight services, to be provided in an efficient, effective and financially responsible manner.</p> <p>In September 2004, the Australian Rail Track Corporation (ARTC) leased the NSW Interstate and Hunter Valley Networks (Leased Network) from RIC for 60 years and commenced a management agreement with RIC to operate the CRN. The CRN includes all the grain branch lines.</p> <p>In effect, the NSW rail system was separated into three networks:</p> <ul style="list-style-type: none"> • Sydney Metropolitan Network, owned and managed by Rail Corporation New South Wales (RailCorp); • Leased Network, owned by RIC, leased and managed by ARTC; and • Country Regional Network, owned by RIC and managed by ARTC. <p>Following the November 2008 NSW Mini Budget announcement, RIC is to be merged with RailCorp (see below) over the next 6-12 months.</p> <p>For access to RIC's CRN, train operators pay access charges relative to the commodity carried and usage, measured by variables including distance</p>
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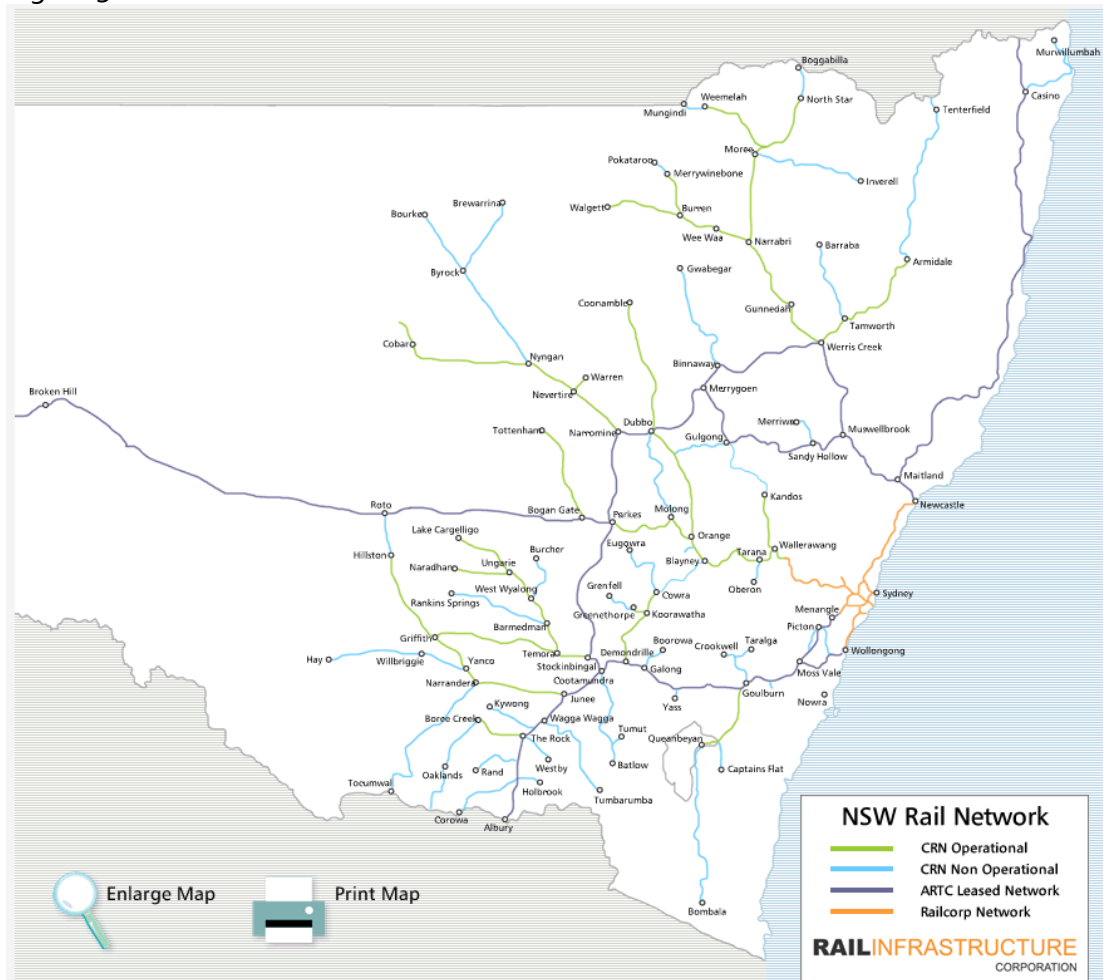
	<p>travelled, weight and the number of movements. These charges are determined in accordance with the NSW Rail Access Undertaking.</p> <p>According to RIC, CRN access revenue currently accounts for less than 6% of the cost of operating and maintaining the Network.</p> <p>While mainlines or the 'core' freight and passenger network are maintained to a high standard, most if not all of the remaining grain branch lines are reaching the end of their economic life. These lines require high levels of routine maintenance as well as a major replacement program for sleepers, ballast and bridges. They will require significant ongoing investment if they are to remain in operation.</p>
Rail Corporation New South Wales (RailCorp)	<p>RailCorp owns and manages the Sydney metropolitan rail network. Where an operator on the CRN requires access to the metropolitan network it is also required to negotiate terms and fees with RailCorp.</p> <p>With the impending merger of RailCorp with RIC, RailCorp will also own the CRN and the Leased Network on behalf of the NSW Government.</p>
NSW Ministry of Transport	<p>Funding for the CRN is provided through RIC's five-year Country Regional Network Funding Agreement with the NSW Ministry of Transport. This Agreement provides for baseline funding (currently of around \$115 million) for maintenance of the CRN in the form of a Community Service Obligation (CSO). Maintenance priorities are determined by RIC within a strategic policy framework provided by the Ministry of Transport.</p> <p>The Ministry (along with RIC) is also responsible for advising the Government on network condition and the achievement of government outcomes. The Independent Transport Safety and Reliability Regulator advise the government on rail safety matters (see below).</p> <p>Four branch lines were suspended from operation in 2005 following the report of the GIAC, and as noted above, the NSW Mini Budget of 11 November 2008 announced that up to a further five grain branch lines would be suspended from operation. A decision on which lines has yet to be finalised.</p>
Australian Rail Track Corporation (ARTC)	<p>The ARTC manages and operates the CRN on behalf of RIC. Under the 60-year Country Regional Network Management Agreement (CRNMA), RIC retains strategic ownership responsibilities of the CRN and ARTC is the infrastructure manager.</p> <p>The ARTC is responsible for allocating train paths on the Network and for selling access to train operators.</p> <p>Both the ARTC and RIC are accredited rail transport operators for the purposes of the NSW <i>Rail Safety Act 2008</i>.</p>
Independent Transport Safety and Reliability Regulator (ITSRR)	<p>ITSRR has three key roles:</p> <ul style="list-style-type: none"> • Administering rail safety legislation (The Rail Safety Act 2008 which requires NSW rail transport operators to be accredited by ITSRR.); • Reporting on the reliability and sustainability of publicly funded transport services ; and • Strategic coordination of safety regulation across transport modes of rail, bus and ferry. <p>The NSW Rail Safety Act 2008 commenced on 1 January 2009. It replaces</p>

the Rail Safety Act 2002 and implements the National Model Rail Safety legislation in NSW.

All rail transport operators must be accredited or be exempt from the requirement. The introduction of general duties makes it clear that accreditation is not a certification of safety, and allows ITSRR to regulate all parties in the supply chain, whether or not they are required to be accredited.

These arrangements are also illustrated in the following Figure.

Figure 3 - NSW Rail Network



Source: <http://www.ric.nsw.gov.au/Default.aspx?query=/maps/>

Road Infrastructure

In relation to the movement of grain by road, the Roads and Traffic Authority (RTA) NSW is the key body with responsibility managing the road network and traffic system, in conjunction with state and local government agencies. The RTA also has responsibility for testing and licensing drivers and, critically, for regulating access to the road network by restricted access (higher mass) vehicles.

The road assets managed by the RTA include:

17,912 km of State Roads and management of 4,268 km of National Highways and nearly 2,946 km of Regional Roads and Local Roads.

4,998 bridges including major culverts

Road tunnels

Roads in NSW are, for funding purposes, classified as State, Regional or Local Roads.

- State roads are funded by a combination of State and Commonwealth contributions and road user charges.
- Regional Roads comprise the secondary road network which, together with State Roads, provide for travel between smaller towns and districts and perform a sub-arterial function within major urban centres. These roads are the responsibility of councils (including determining priorities and carrying out works) but receive a block grant of funding from the State Government.
- Local Roads represent a large proportion of the NSW road network and comprise those roads not classified under the *Roads Act 1993* (and some classified roads that now provide for only local access and communication). These roads are the responsibility of Local Government authorities, funded by local ratepayers with some limited assistance through federal road assistance grants and the State Government.

Grain Storage Infrastructure

While a small percentage of grain is stored on-farm after harvest, the majority is transported to regional silos or larger sub-terminals and mainline silos, owned and operated by private sector companies.

Over the decade there has been increasing horizontal and vertical integration of grain storage, bulk handling and marketing companies, with companies like GrainCorp and AWB operating extensive networks of country storage facilities, export port terminals and trading operations in NSW.

With the deregulation of the export wheat market under the new *Wheat Export Marketing Act 2008* the location and ownership of grain storage and handling infrastructure may well change as has been the experience in other parts of Australia. In addition, the Act makes explicit provision to protect access to grain

storage and handling infrastructure at port terminals. If a company applying for accreditation as a wheat exporter is the provider of a port terminal service (as defined in item 4 of the Act) Wheat Exports Australia must not grant it accreditation unless it passes the access test. This means that unless the company agrees to continuous disclosure provisions on services being provided and the shipping program for the terminal and gives other accredited companies access to its port terminal services, the company will be refused accreditation. From 1 October 2009, the accredited operator must have in place an access undertaking approved by the ACCC. This is intended to guarantee port terminal access to all accredited exporters while at the same time not restricting the ability of port terminal operators to function in a commercial environment.

Key Issues and Questions

The Review is seeking the views of interested parties on the issues identified in the Terms of Reference. To assist in the preparation of submissions, these issues have been grouped into four main areas and a set of guiding questions relating to each issue have been identified. Background or context to these issues is provided in the section above.

Changes in production patterns and in domestic and export markets for grain

In order to understand the future demand for transport used to move grain in NSW as well as the demand for storage and other links in the supply chain, it is necessary to examine how the production and demand for grain are changing and/or may change in future.

There are many influences that will impact on outcomes in five, ten or fifteen year's time. Climate change is expected to alter rainfall patterns; growth in emerging economies, especially China, is a key driver of world commodity demand; and new farming practices and varieties of grain are being constantly developed and trialled.

As growers, scientists, traders and customers you will have experience and information that can inform the review on the following key questions.

- **What significant factors are likely to impact on the supply and/or demand for grain in the medium to long term?**
- **How will these factors change the future demand for the transportation and storage of grain?**

Deregulation of the bulk wheat export market

With the end of the single desk marketing arrangements for wheat on 1 July 2008 and the accreditation of some twenty one wheat exporters since that time by the new Wheat Exports Australia, new opportunities are available to growers to maximise the return on their crop destined for overseas markets.

Although it is early days in the deregulation of wheat marketing, the Commonwealth's *Wheat Export Marketing Act 2008* is the latest in a long line of deregulation in other parts of the grain market around the country and in rail services over the last decade. Flow on changes to transport, storage and handling arrangements for wheat can be anticipated.

- **As a grower, grain handler, transport operator or exporter, what changes to the transport and storage of grain do you expect to emerge from the introduction of the *Wheat Export Marketing Act 2008*?**
- **What if any changes or impacts did you observe over the last season (the first season under the new arrangements)?**

Enhancing the efficiency of grain transport, storage and handling

There have been numerous reviews of grain logistics over recent years which have identified deficiencies throughout all parts of the chain – rail, road, ports and transfer points. A core outstanding issue is the future of the NSW grain branch lines and on what basis, if any, ongoing rail freight services are sustainable on these lines.

Grain volumes on the branch lines are low and highly variable which has resulted in a progressive shift to road transport and, in the last 12 months, to rail operators transferring this risk through ‘take or pay’ contracts. These lines are approaching the end of their economic life and currently have major (load and speed) restrictions on their use due to poor track condition. They will require significant investment if they are to remain operational. A clear case for making such an investment in light of industry and market changes has not been made.

If remaining CRN grain branch lines were to close, how would road transport operators respond to the shift in the grain freight task and what changes would be needed to facilitate this shift? Indeed, is road even capable of handling the entire first leg in the grain supply chain, from farm to major (mainline) consolidation points, particularly in the event of a record grain harvest?

While the rail branch line dilemma is a central and critical issue for this Review and many stakeholders, the Review will also examine the opportunities for improvement and efficiencies throughout in the grain supply chain and in the regulatory environment in which it operates.

- **What are the current deficiencies in the grain logistics chain?**
- **What changes to infrastructure, operations and/or management arrangements would overcome these deficiencies?**
- **Are there any access, institutional or regulatory changes required to improve efficiency?**
- **How should the costs of any proposed changes be met?**

Implications for regional communities and the environment

The implications of various decisions or interventions that may emerge from this Review will undoubtedly affect communities in rural and regional NSW to some degree. Following the decline of the grain rail network and the significant increase in the size and volume of trucks on local government roads, cost shifting from State to Local Government has been identified as an issue. Further, the NSW GIAC report of January 2004 noted:

Increased costs for road construction and maintenance and for the side effects of road haulage – noise, exhaust emissions and accidents – are not generally reflected in the prices paid for road use.

The cost impacts of road transport will need to be reliably quantified. In addition, grain freight transport options also have varying impacts on community amenity, safety and the environment in terms of greenhouse gas emissions, fuel efficiency, and noise.

It is important that these external costs and benefits to communities and the environment be identified as they can be significant.

- **What implications would any of the changes you propose to grain transport and storage arrangements have for the economic and social wellbeing of regional communities?**
- **What if any implications would there be for the health of the environment?**

Making a Submission

Submission should address the key issues and questions identified in this paper and be supported where possible with relevant facts and data.

Submissions can be made to:

e-mail: nswgrainfreightreview@infrastructure.gov.au

Electronic submissions are preferred in Word or PDF format files.

Fax: (02) 6274 7400

Or Post to:

NSW Grain Freight Review
Department of Infrastructure, Transport, Regional Development &
Local Government
GPO Box 594
Canberra ACT 2601

Should you require further information about the Review or making a submission, please contact the NSW Grain Freight Review Secretariat on 1800 044 938.

The closing date for submissions is 17 March 2009.

Use of Submissions

Submissions and comments provided to the NSW Grain Freight Review in response to this call may be published on the Department of Infrastructure, Transport, Regional Development and Local Government website.

If you believe that the information you provided in response to this invitation:

- is, or should be, confidential; or
- disclosure of this information would unreasonably affect your personal privacy; or
- disclosure of this information would unreasonably affect your business affairs;

notice is to be given at the time of delivery of your submissions or comments by clearly marking such information 'confidential' or 'commercial-in-confidence'. Insofar as its obligations under the law permit, the Department of Infrastructure, Transport, Regional Development and Local Government will give effect to your stated wish, and requests for such information will be determined under the *Freedom of Information Act 1982*.