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Re: Sydney Gateway Environmental Impact Statement

To Whom It May Concern,

Qube Logistics is pleased to respond to the NSW Department of Planning, Industry and Environment's request for comment on the Sydney Gateway (Gateway) Environmental Impact Statement (EIS).

Qube Logistics is a Division of Qube Holdings, Australia's largest integrated provider of import and export logistics services, covering the complete supply chain from beginning to end with a workforce of over 6,500 employees, working across 125 locations in Australia, New Zealand and South East Asia. Qube has a market capitalisation of over $5 billion (ASX QUB) and has leading positions in its core markets.

Qube Logistics provides a broad range of services for the import and export of containerised cargo. It operates in 36 locations nationally including all capital city ports and has an expanding footprint in inland metropolitan and country regional areas with connections to major Australian ports. Qube Logistics has an annual revenue of over $700 million and close to $100 million in EBITDA.

More specifically, Qube Logistics has been operator of the Cooks River Intermodal Terminal (CRIT) at St Peters since 2018 when it acquired the business from long term tenant Maritime Container Services (MCS). CRIT has operated as an intermodal facility for road and rail operators since 1947. Today, CRIT is still branded under the MCS banner and is the largest open access full service empty container park and intermodal terminal in the country.

However, CRIT now finds itself directly within the proposed corridor of the Sydney Gateway route which will substantially impact the operations and storage capacity of the terminal. These significant effects of the proposed Sydney Gateway Concept Design on CRIT have already been discussed and quantified separately with Transport for NSW (TfNSW) and its forebear Roads and Maritime Services (RMS).

Geographically, the terminal sits some ten kilometres by road and eight kilometres by rail from Port Botany. It is accessible from key arterial road infrastructure including the Princes Highway, M5 Motorway and Eastern Distributor. It is also located opposite the new WestConnex St Peters Interchange which will provide a direct connection to the M4 Motorway and a more direct connection to the M5 Motorway. Equally it has a direct rail connection via the Port Botany Freight Rail Line although operators are required to run around on the mainline in the absence of a direct rail turn out to port.

CRIT offers container storage as well as facilities for the repair, washing and upgrading of empty containers and other ancillary container-related services. Trucking operators from small one truck owner drivers right through to medium and large transport firms use it to deliver empty containers and collect full containers while optimising their truck fleets and minimising the number of trucks travelling to and from Port Botany.

At the same time, rail operators deliver Full Container Load (FCL) units from regional areas for pre-receival, storage and onward delivery to the export terminal via rail or road for loading onto ships, based around the ever-changing global shipping schedules. In reverse, MCS loads trains with empty containers on behalf of shipping lines to deliver to regional exporters up country for packing. Direct port shuttles also operate from CRIT to and from the Port (via the mainline run around).

As per the NSW Ports Masterplan Navigating the Future (2015), CRIT will remain an essential part of the future port supply chain for NSW going forward. It will have the capacity to handle additional container volumes to service the needs of the NSW, becoming an inland extension to Port Botany and operating effectively as an extended port gate as forecast volumes go beyond 7.5 million Twenty-Foot Equivalent Unit (TEU) by 2045, including up to some 2.9 million empty TEU. This number is in fact greater than the total port trade today as the volume of full import containers is forecast to grow at a faster rate than full export containers. What is more, over the next 30 years the volume of containers having a destination within 10 kilometres of the port including Cooks River is also forecast to triple.

The CRIT is located on prime, port related land, that operates as an extension of the main trade gate for NSW, Port Botany. The land associated with the Port is a finite resource that is currently under significant pressure due to urban encroachment and industrial re zoning. This has already been recognised by both Government and NSW Ports. Moreover, a facility such as CRIT requires large paved areas for container stacking and other transport operations, as well as facilities for container washing and repairs plus warehousing for container pack and unpack activities. These are extremely limited sites within the immediate local and broader port area where container handling for such activities is currently permitted.

In November 2019 TFNSW released the EIS for Sydney Gateway. Qube Logistics believes the EIS to be deeply flawed and fails to credibly address, or satisfactorily resolve, a number of major environmental issues that will be a direct result of the proposed roadway design. The impact of this will be felt by not just by the 250-plus registered port road transport operators using CRIT daily, but also the local Mascot community, international shipping lines calling Sydney, NSW importers and exporters and ultimately the State economy. Equally, it will negatively impact upon the NSW Government's stalled efforts to increase the Port rail mode share to 28 per cent or the more aggressive NSW Ports' target of 40 per cent, some 3 million TEUs by 2045.

Above all, the Gateway EIS does not appear consistent with the NSW Ports Masterplan Navigating the Future (2015) for Port Botany including CRIT. This is specifically in relation to where Government is tasked with preserving industrial lands for port and intermodal uses, while preserving the ability of these assets to grow and operate efficiently and protecting land for future port, intermodal, road and rail infrastructure. In doing so, the NSW Government is preventing Qube, and by default NSW Ports, from managing and developing our assets in a safe, efficient and importantly environmentally responsible manner to secure a port supply chain that will meet NSW's growing freight needs.

Background

By way of background, MCS was established in the early 1970s by Grahame Wright and has had operations in both the vicinity of, and within, Cooks River since the mid 1980's. The current CRIT site fronting Canal Road in St Peters, was aggregated over a number of years by successive leases from what is now known as NSW Ports and Sydney Airport Corporation Limited (SACL) although the land leased from the latter has now been subsumed by Gateway.

In late 2017, the companies comprising the MCS Group were acquired by Qube Logistics. As a result of certain undertakings given in response to ACCC inquiries, Qube did not commence operational control until around April 2018.

In October 2018, Qube was advised that RMS intended to compulsorily acquire part of CRIT across the south eastern boundary of terminal adjacent to the terminal rail lines for the purposes of the construction of the Sydney Gateway project. This includes fully occupying a section of land that MCS has leased from SACL for over 10 years. While the overall land parcel affected by the compulsory acquisition was relatively small in total area relative to the overall site, its strategic and operational loss will have a significantly disproportionate impact on the functionality of the overall facility and to the overall Port Botany supply chain from an environmental perspective.

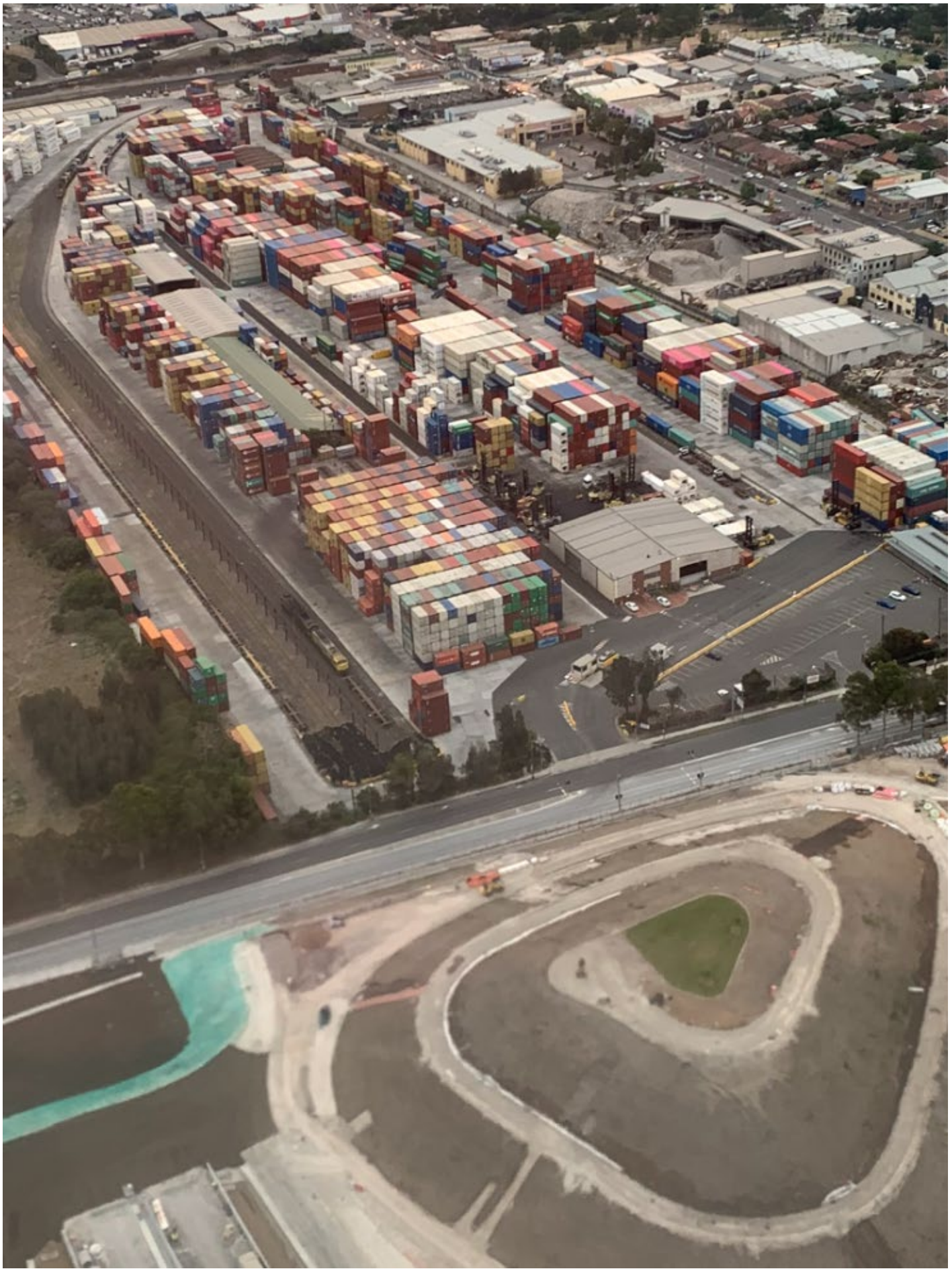
Importantly, it also became apparent at this point that the previously proposed RMS direct access ramps to and from Sydney Gateway to CRIT - as provided to and discussed with MCS and its advisors previously by RMS - had now been removed from the new roadway design forcing some 1,500 trucks a day, and growing, to continue to travel along now largely residential and already gridlocked streets to and from the port without any effective buffer. This particular issue on its own will have a massive negative environmental impact to the overall outcome of the Gateway project as port heavy vehicle movements are locked into already congested local streets ad infinitum. Notably, no consultation on this decision to withdraw the ramps was ever provided by Government.
In November 2019, RMS further advised Qube Logistics that it would now no longer acquire any land from CRIT with the exception of the land already surrendered as part of the SACL lease. This is after nearly 12 months of advising us there was no way the road could miss us. Despite this advice, the EIS still shows Gateway taking land up land and impinging upon CRIT. Nor is it clear either about any potential further construction impacts. Nonetheless, it is understood that TFNSW intend to not take Gateway "through" CRIT" but rather run the roadway directly along the eastern boundary of CRIT. This will still have significant operational impacts to the site resulting in further substantial negative environmental outcomes directly as a result of this chosen roadway design and route.

This includes most notably a direct impact to closing down any rail loading and unloading on the Eastern side of the terminal - currently the busiest part of the terminal - thereby decreasing the opportunities for rail within site unless there is a major capital investment to undertake expensive yard reconfiguration to upgrade other track and hardstand. This outcome is directly contrary to the NSW Ports Masterplan to grow capacity at CRIT to cater for growth in container volumes moved by rail. Instead, this will simply result in increased terminal volumes on road, exacerbating the effects of the above mentioned ramps being removed.

Equally Qube (and its predecessor MCS) intended to develop a direct port rail turn out under Gateway to allow direct port shuttles to and from Port Botany in the face of increased difficulties shunting in and out onto the main line. While we understand that the revised Gateway design does not now "preclude" this from happening, the likelihood is that this will not be able to be constructed until after Gateway is built, thereby substantially delaying the project. Accordingly, there is now a major risk that port rail volumes are simply transferred to road and that the terminal becomes a road only facility. Again, when combined with the withdrawal of the Gateway ramps, the negative environmental externalities of this combination of outcomes will simply be catastrophic to the local road network and community.

A third issue associated with the proposed Gateway route, whether it takes up CRIT land directly or merely runs along its border, is that it will reduce the overall stacking capacity along the whole eastern side of the terminal. Boxes will have to be stacked single high across that area for safety reasons due to the proximity of the roadway. When combined with the loss of capacity at the Tynes St Peters ECP which is completely removed by Gateway, there is a reduction of some 27% of the total Sydney ECP market capacity without any genuine near term replacement options.

This means that there will simply be increased volumes heading to and from Cooks River to 'find a home'. In the absence of any ramps and meaningful ability to manage empties by rail, this is just going to add additional traffic on the roads surrounding CRIT to and from the Port. Qube believes further analysis needs to be undertaken on the overall impact of the reduction in ECP capacity across Sydney as a result of Gateway and the negative environmental impacts this will ultimately result in for the Port Botany supply chain.



Empty Container Park Operations

The core business of MCS is to operate as an Empty Container Park (ECP). CRIT is the largest Intermodal ECP in Australia.

Central to the facilitation of efficient global non-bulk trade is the availability of a pool of shipping containers. When an import container is collected by the importer and unloaded at its warehouse, the empty container is returned to an ECP by a port road transport operator. There, the container is inspected / surveyed and if necessary, washed and repaired, both externally and internally. If it is a refrigerated container (reefer) its refrigeration unit and temperature monitoring mechanisms are also checked (Pre-Trip Inspection or PTI). In certain instances, a container may need to be "upgraded", involving internal repainting and sealing or being otherwise treated to make it suitable to load with food, cotton and other sensitive cargos.
Otherwise, the empty container is received into CRIT and stored on site in a dedicated stack until it is booked out again by a shipping line. When an exporter makes a booking with a shipping line to carry its goods out of Australia, the shipping line will issue a release number and identify a particular ECP from which a suitable empty container can be collected by the exporter, ready to pack with its goods and deliver to the relevant terminal to be loaded on to the ship.

In addition to these services, if a shipping line needs to reposition a number of empty containers from one place to another (either inside or outside Australia) as a result of trade imbalances, MCS will be requested to move those empty containers (typically by road) to the shipping line's contracted port terminal. This often occurs in large volumes in what are known as "stack runs".

It should however be noted that for every two full containers that are imported via Port Botany (the Port), one goes out empty, thus representing a large percentage of the overall port trade with some 800,000 TEUs from a total of 2.6 million. By 2045 this empty volume is forecast to be up to some 2.9 million empty TEU – greater than current total port trade - as the volume of full import containers grows at a faster rate than full export containers. Currently the Port Botany terminals do not regularly receive empty containers by rail and thus the overwhelming majority of these large movements of empty containers now and into the foreseeable future are by road only.

Rail operations

In addition to the container gate in, storage, maintenance and repair (M&R), and gate out services, CRIT is accessible by a dedicated rail freight line running from both "up country" and directly to and from Port Botany. NSW Ports has set a target to move three million TEU per year by rail by 2045. Achieving this target requires action by all stakeholders involved in the container rail supply chain with the efficient operation of CRIT essential for helping to achieve this target.

CRIT receives Full Container Load (FCL) units from regional areas for pre-receival, storage and onward delivery to the export terminal via rail or road for loading onto ships, based around the ever-changing global shipping schedules. In reverse, MCS loads trains with empty containers on behalf of shipping lines to deliver to regional exporters up country for packing. Direct port shuttles also operate from CRIT to and from the Port, but are required to run around on the mainline in the absence of a direct rail turn out to port.

In terms of volume, CRIT handles over 100 trains a month. Moreover, in the event of any disruption at the Port rail terminals (maintenance, track closures etc), all port trains bound for Port Botany generally terminate at CRIT. Containers are then loaded onto trucks for delivery by road to the Port.

To this end, CRIT, serves as the only major release valve for the Port rail supply chain for exports. This has been an important activity over the years and with planned upgrades to the Port rail terminals, CRIT will again be used in this fashion for a considerable time to allow the works to be undertaken.

Heavy Vehicle Access Ramps

As stated previously, when Qube acquired the MCS business, information provided by RMS was presented as part of the due diligence process which clearly illustrated direct access ramps to and from Sydney Gateway to CRIT. These have been subsequently removed by RMS / TFNSW citing overall project cost concerns and a

belief that if the ramps were open to passenger vehicles it would cause unmanageable congestion on Sydney Gateway.

It should be stated that Qube has never supported any suggestion that the proposed ramps would also carry passenger vehicles, nor that such ramps be exclusive to vehicles accessing CRIT. Qube has always believed the ramps should be heavy vehicle only and also service the St Peters precinct as a whole, noting there are a number of considerable adjacent freight facilities such as Boral and a Goodman's warehouse facility amongst others. There is also the opportunity for airport buses to use such ramps benefitting both the local road network and broader public.

This concept of freight only road assets for the Port Botany precinct is consistent with the NSW Freight and Ports Strategy 2018 – 2023 and the NSW Ports Masterplan of 2015 Navigating the Future. Moreover, Qube believes that making the ramps heavy vehicle only presents an opportunity to improve the efficiency of the Port empty container supply chain as a whole and make it more environmentally sound. This is especially so when the roads in Mascot are already heavily congested and regularly gridlocked. Conversely, it is counter-intuitive to inhibit the operational flexibility of the logistics industry in NSW's most significant freight precinct resulting in guaranteed increased negative road externalities at a time when container volumes at Port Botany are expected to triple within the next 30 years.

CRIT is an open access intermodal facility with over 250 registered port road transport operators that call on a regular basis. Failure to have ramps connecting to Sydney Gateway will be a negative environmental impact that is felt by not just the industry as a whole. It will equally be felt by the local community and ultimately the entire NSW economy through the increased inefficiency of the Port Botany supply chain.

It is also worth reiterating that in the event there are rail closures at Port Botany, then freight trains terminate at CRIT. In that eventuality, all industry participants wishing to transport export goods are obliged to utilise CRIT to undertake onwards distribution to the Port.

Simply put, the failure to incorporate direct, dedicated connections to Sydney Gateway for heavy vehicles travelling to and from CRIT and the St Peters precinct will cause massive economic loss to the NSW economy through increased congestion in the Sydney Airport precinct. It will force hundreds of trucks to travel long term through local streets around Mascot which are now home to large scale residential apartment developments with no buffer between road freight and living activities. The negative environmental outcomes of such a decision will be disastrous and everlasting for such communities.

Furthermore, this will engender complaints from local residents, which will invariably lead to decisions by governments that further inhibit freight movement. Any attempt to curtail or ban heavy vehicle movements in this area will further impinge upon the ability of the NSW logistics industry to service rapidly growing demand for freight and lead to increased negative environmental outcomes as heavy vehicles are forced to take sub optimum routes.

Community and Residential impacts

Historically and up to the present day, trucks traveling to Port Botany from CRIT do so utilising the initial part of the journey along Canal Road, Kent Street, Coward Street, Bourke Road and then O'Riordan Street in Mascot and the reverse route starting with Robey Street (See Appendix A).

All of these individual thoroughfares are already substantially congested, and in peak times are virtually gridlocked. Where once these streets were home to industrial and commercial enterprises, they are increasingly occupied by major new apartment developments. As a result of this urban encroachment on traditional industrial areas, there are also now increasingly large numbers of pedestrians utilising the sidewalks which has resulted in well documented road safety issues and accidents in the area.

To continue to operate heavy vehicles along this route directly adjacent to housing units with no buffer will undoubtedly result in further conflict with residents. It may well lead to a ban on trucks accessing this route with strict curfews as the impact becomes impossible to manage and co-existence unworkable. This will have a cascading impact on the ability of Port Botany as a whole to operate efficiently 24/7 as is required to move the sheer future volume of total containers, unnecessarily delivering more pressure on the local road network to operate within restricted hours.

CRIT sees some 1,500 movements in and out of the Terminal on a daily basis today. The continued growth in container volumes referenced earlier means that heavy vehicle traffic volumes servicing CRIT and Port Botany will continue to increase substantially in future years. This situation will be immediately exacerbated in the short term by the proposed complete closure of the Tyne St Peters ECP as a result of Sydney Gateway construction, which will divert containers to other ECP's and most likely to CRIT as the nearest operating facility. As the largest ECP in the country, CRIT occupies a critical role in the NSW supply chain and without direct access to Sydney Gateway then the whole port supply chain will be impacted with substantial negative environmental externalities that will impact the whole State economy.

In comparison, the provision of heavy vehicle only access ramps at Canal Road would provide a vastly superior route to and from the Port, delivering tens of millions of dollars in productivity savings and environmental benefits for the State's economy through reduced congestion and improved truck turnaround times. Accordingly Qube has proposed the ramp design attached at Appendix B for heavy vehicles access, including for newly approved Higher Productivity Vehicles (HPVs), to and from Canal Road to Sydney Gateway for construction by RMS.

Improving Road Network Productivity

Higher Productivity Vehicles (HPVs) or Performance Based Standards 2B vehicles (PBS2B) capable of carrying four twenty foot equivalent units (TEUs) at a time or two forty foot equivalent units (2 FEUs) at once have recently been approved to operate from CRIT to Port Botany and return. These vehicles can significantly reduce the number of trucks trips required for the primary task of repositioning of empty containers from Cooks River with a benefit to shipping lines and importantly other road users as well as the community with far greater environmental outcomes all round including greater two way loading and reduced emissions via the latest Euro standard vehicles.

As per Appendix C, there are two approved routes from Cooks River to Port Botany for HPVs - one for the daytime from 0600 to 1900 hours and one for the night time from 1900 to 0600 hours. The daytime route is particularly lengthy to go to the Port travelling a circuitous roundabout route and passing a large number of residential areas while the return route for both day and night similarly runs through congested and now largely residential Mascot roads with the same issues as previously described.

By installing ramps at Canal Road from Gateway capable of taking HPV's, the movement of these already significantly more efficient vehicles could be even further improved allowing them direct access to and from the Port day and night via Gateway for rapid continuous 24/7 running of empty returns. This would further reduce the number of truck trips required and vehicles on the road from Cooks River for the movement of empty containers (which remains the greatest freight task of the terminal). It would equally deliver far greater environmental outcomes including reduced emissions to the surrounding areas and residents.

Direct Port Rail Turn out from CRIT

As per the above, the vast majority of containers travel to and from the Port by road with the rail network comparatively underutilised. Maximising the transport of containers by rail between Port Botany and Sydney metropolitan intermodal terminals will therefore be essential for cost-effective, efficient and sustainable container distribution throughout Sydney. Growth in use of rail will benefit the road networks surrounding the Ports by reducing the numbers of trucks. Correspondingly, significant growth in containers moved by rail will enable Port Botany to achieve its optimum capacity. For that reason, Port Botany will not achieve an annual container throughput of over seven million TEU without rail becoming a more significant component of the port logistics chain.

Qube Logistics is highly supportive of the efforts of both the NSW Government and NSW Ports to increase the volume of containers carried by rail to and from Port Botany. NSW Ports have set a target of three million TEU per year to be transported by rail by 2045 – around 40 per cent of forecast container volumes. Achieving this target requires action by all stakeholders involved in the container rail supply chain including NSW Ports, all levels of government, rail operators, shipping lines, stevedores and intermodal operators.

Consistent with the ***NSW Ports Masterplan (2015)*** and supporting the growth in rail operations at CRIT, both MCS previously and now Qube Logistics in its future terminal plans for CRIT have proposed the development of a new rail turnout for shuttle trains travelling directly to and from the Port, or for regional trains calling ex-Port for the loading of empties for onward delivery up country for packing. This link, like the rest of the terminal would be

open access for use by all rail operators calling CRIT. It would also further promote the opportunity for the direct return of empties to Port Botany by rail, which is currently minimal, with CRIT having the ability to operate empty container storage areas for such rail transfers as once more identified within the NSW Ports Masterplan.

The proposed Port rail turnout would cross directly underneath the proposed EIS design of Sydney Gateway in line with where the roadway crosses the main Port Botany rail line at elevation. A draft route for the prosed new Port rail turnout is attached at Appendix D.

If the NSW Government is truly committed to growing the mode share of rail to and from Port Botany, then it is absolutely critical that the Sydney Gateway concept design allows for this future rail connection (which we understand is now the case, following concerted representations from industry). Conversely, if the rail connection is not permitted, any train travelling to and from the Port from CRIT will be required to both run around and shunt on the main line, significantly impacting the overall capacity of the Port Botany rail supply chain.
However, although we now understand that the port rail turn out is now not "precluded" from the design with the corridor to be protected, there is seemingly no consideration by TfNSW to allow its construction during that of Gateway itself. This means that such rail access is over 6 years away from actually being constructed (at a minimum). The simple fact is that with the already significant operational impacts to rail loading on the eastern side of the terminal caused by Gateway and now the inability to develop a port turn out, this will likely make CRIT a road only facility with rail operations ceasing. This will have disastrous environmental outcomes for industry, the community and above all the Government's own rail mode share target which is expected to already fall well short of the 28 per cent target by 2021.

A direct port turn out conversely will drive improvements in rail productivity and growth in rail usage by increasing the utilisation of each port shuttle train, increasing train two-way loading, improving on-time running and growing investment in new rolling stock all delivering improved environmental standards. It will also moreover underpin the investment currently being made by NSW Ports and the stevedores to reconfigure their port terminals to grow port rail capacity and throughput in the face of both increasing trade volumes and larger vessels transferring greater numbers of containers per visit. Without a direct port rail turn out from CRIT, this investment and the overall port rail supply chain will be significantly impaired.

Sydney ECP Capacity

While the Gateway EIS documents recognise that additional ECP capacity will need to be created to replace that lost at Tynes St Peters, the assumption that additional capacity may be added at Enfield, Moorebank and St Marys in time is deeply flawed.

At this stage there is no open access ECP facility at Enfield and St Mary's is still in the early planning process with a referral to the Independent Planning Commission that will potentially require additional approval time, As the operators of Moorebank, we think it is unlikely that we will have an ECP there with empty containers instead being railed back to Cooks River for onward road distribution to Port Botany.

Above all, no international shipping line has agreed to store containers away from Port Botany and thereby not providing any commercial imperative for the dehire of containers in Western Sydney.

With both the concurrent reduction in ECP capacity and growth in overall trade it is therefore unlikely that any replacement capacity will actually be put on stream in time given the imminent closure of Tynes and the roadway construction commencement that will greatly impact CRIT capacity from the outset.

With the number of empty containers forecast to grow, shipping lines will therefore need to play an important role in reforming the way in which empty containers are managed. This will include reducing dwell times; de-hiring containers at intermodal terminals; planning in advance for the return of empty containers to vessels; maximising the return of empty containers by rail to port; improvements in two way loading for empty returns; and making sure facilities at stevedore terminals can accept empty container arrivals by rail. All of these factors would benefit greatly from heavy vehicle access ramps at Canal Road and a direct port rail turn out connecting CRIT such that efficient 24/7 freight operations can be maximised to meet the overall forecast trade growth.

Qube formally questions the credibility of the ECP analysis and supporting ECP technical report undertaken for the EIS and believes this needs to be reinvestigated properly by people with actual empty container park operational experience.

Conclusion

Instead of improving freight access to and from Port Botany, Gateway will instead bypass Australia's largest empty container park and intermodal terminal delivering substantial negative environmental outcomes to NSW road and rail freight operators, their import or export customers, shipping lines, the local community and the NSW Government. This represents a significant lost opportunity for the State whose impact will be felt ad infinitum. In its place, Gateway will actually directly impact in a significant manner the capacity and operations of CRIT in an environment where such land for this type of operation is extremely scarce.

Qube submits that in line with ongoing discussions with TfNSW, there is a very strong case through the Sydney Gateway EIS process for the NSW Government to reinstate direct, dedicated ramp connections for heavy vehicles to and from Sydney Gateway at Canal Road with highly positive outcomes for all port transport operators, who would experience vastly improved efficiencies in moving containers to and from Port Botany by road. Equally the Mascot community would see substantially less congestion and a reduction in negative environmental outcomes from the project. Even with a focus on growing container movements by rail, trucks will continue to be the primary means of moving containers to and from Port Botany over the next 30 years and therefore the provision of direct access ramps will be crucial for the entire port supply chain.

Likewise, by ensuring that a future rail corridor underneath Sydney Gateway can be built at the same time, TFNSW will be helping to plan for both the expected growth in rail port movements while increasing overall rail efficiency through reduced main line shunting. Moreover, in protecting such a corridor, TFNSW will also be helping to future proof Sydney Gateway by allowing for additional rail capacity that will ultimately help to keep as much of the forecast growth in containerised freight off roads as possible, while delivering the associated positive environmental impacts to the local community of such an outcome.

Failure to deliver both the direct access ramps and the port turn out will however undoubtedly mean that the port cannot achieve its planned trade throughput potential. Just one mode will not suffice. Moreover, inefficient road and rail connections to and from CRIT will have widespread negative externalities as the overall port supply chain fails to cope with an increasing NSW freight task. This will already be further exacerbated by the fact that Gateway as planned does not connect all the way directly to the Port.

In addition, Qube believes further expert analysis needs to be undertaken on the overall impact of the reduction in ECP capacity across Sydney as a result of Gateway. The negative environmental impacts this will ultimately result in for the Port Botany supply chain and NSW economy will be substantial unless a major reconfiguration of CRIT to partially mitigate such an outcome can be delivered to partially offset such losses.

Qube would like to take this opportunity to thank the NSW Department of Planning, Industry and Environment for being able to comment on the proposed Sydney Gateway EIS and would welcome any questions that you may have.

Yours sincerely

Sean Hovey

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Qube Logistics