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The Hon. Anthony Roberts, MP
Minister for Planning Department of Planning and Environment
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SUBMISSION IN REPLY TO THE 2022 REPORT BY ARTC

“Narromine to Narrabri – RESPONSE TO SUBMISSIONS”

I OBJECT TO THE PROJECT.

1. BACKGROUND:

1.1 I presented a detailed and referenced “SUBMISSION TO INLAND RAIL NARROMINE TO NARRABRI EIS” to the NSW Department of Planning, Industry and Environment” on 6th February 2021. However I have had no contact by ARTC or its consultants on either the Submission or its referenced issues. ARTC has refused to acknowledge me and my Submission or adequately address any of those issues in its 519 Page RESPONSE Document.

1.2 The Inland Rail Project, as defiantly still proposed by ARTC, is non-viable due to many reasons (including the major environmental impacts, lack of any economical business case, major continuing cost blow outs, lack of budget, lack of essential approvals along the length of the project and still inadequate plans).

1.3 Very importantly, ARTC has proven its incompetence and unsuitability to be entrusted with this Inland Rail Project by its continued disregard of all of the above reasons and its continued refusal to properly consult with reputable professional and local expertise.

1.4 The Queensland Government has for many reasons refused to approve the construction of any of the Inland Rail in Queensland and suggested that ARTC try to get its act together and come back to it by August 2023 with new information [*“Coordinator-General stated a new project declaration lapse date of 1 August 2023”*]
<https://www.statedevelopment.qld.gov.au/coordinator-general/assessments-and-approvals/coordinated-projects/current-projects/inland-rail-calvert-to-kagaru>

1.5 The N2N EIS is not in the public interest and the project should not be approved.

2. INCOMPETENCE SHOWN BY ARTC AND ITS FAILURE TO CONSULT WITH REPUTABLE PROFESSIONAL AND LOCAL EXPERTISE.

2.1 The new ARTC Document 2022 titled “Narromine to Narrabri Project RESPONSE TO SUBMISSIONS” fails to adequately address the issues raised in most of the Submissions concerning

the N2N EIS or indeed the issues in the very many Submissions to many Government Authorities (including the Senate and Queensland Governments) and the ARTC itself.

2.2 All of the issues raised in my original Submission (SUB- 14121034) 'SUBMISSION TO INLAND RAIL NARROMINE TO NARRABRI EIS' are still highly relevant although ignored by ARTC.

2.3 ARTC unfortunately appears frozen in some type of time warp, and proves to be incapable of learning, consulting and rational behaviour.

2.4 This disregard (and subsequent misrepresentation by ARTC) of the issues is an insurmountable barrier consistently used by ARTC to prevent genuine dialogue and two-way communication with the many stakeholders affected by the Inland Rail Project, as discussed in the paragraphs below.

2.5 What ARTC is proposing in its new Document is still absurdly its "business as usual" plans which conflicts markedly with:-

- the known facts, the impacts, the lack of any justifications or viability on environmental, social or economic grounds; and also
- the total lack of necessary approvals and certainty anywhere in Queensland and in much of New South Wales and Victoria.

2.6 The disclaimer itself at the very front of the ARTC RESPONSE Document suggests that ***"Neither JacobsGHD (the consultants of ARTC), ARTC nor their employees shall have any liability for any loss, damage, cost or expense incurred ... by relying upon the information in this document, whether caused by error, negligence, omission or misrepresentation in this document."*** This is an attempt to avoid responsibility for "error, negligence, omission or misrepresentation in this document" and so distance ARTC from all responsibility for its culpable behaviour and RESPONSE.

2.7 For many reasons also very relevant to New South Wales, the Queensland Government has consistently refused to approve the construction of any Inland Rail section or facility anywhere in Queensland. The ARTC's response to the Submissions Narromine to Narrabri makes no reference to the lack of approvals to construct anything in Queensland. ARTC has been deceitful and misleading in promoting a facade that nothing (including approvals. Impacts, environmental viability, economic viability or culpability etc) matters with respect to Inland Rail.

2.8 ARTC does acknowledge (in Section 7:12 of their Document) the comment "The rail line should terminate at Newcastle to reduce impacts on regional NSW and south-east Queensland". It is unfortunate that without any justification, ARTC then ignores the comment and the lack of approvals in NSW and Queensland to plan "business as usual" to proceed to Brisbane regardless of impacts.

2.9 My own calculations as a senior air quality expert have proven that the Inland Rail project cannot be allowed into the Brisbane Airshed east of Toowoomba, without very significant violation of current Queensland Air Quality Legislation. The ARTC team and its consultants have continued to ignore this proven fact, despite this fundamental flaw in their dictatorial plan to terminate east of Toowoomba in Brisbane regardless of the consequences. ***[This violation of Air Quality Legislation will occur because of the massive impact of the diesel emissions from the locomotives and trucks servicing the Inland Rail Project in the Brisbane Airshed. I was the senior Air Quality Scientist responsible for the formulation and implementation by the Brisbane City Council of the original Brisbane Air Quality Strategy in 1996 to protect the air quality of Brisbane and its surrounding***

Airshed. The Inland Rail project has been calculated to have a major impact on air quality by doubling the emission of man-made fine particulates and adding approximately 56% more of the emissions of oxides of nitrogen (an ingredient for forming regional photochemical smog) into the Brisbane Airshed where already the concentrations of fine particulates and of smog exceed Air Quality Standards. A proposed power station with significantly less diesel emissions than the Inland Rail was stopped by the Brisbane City Council precisely because of the unwanted impact of those lower diesel emissions].

2.10 In contrast to a rational address of the serious air quality impacts of the project, the ARTC has further shown its complete disregard for these impacts by aggressively abusing me personally and preventing me from speaking on this issue at a public Community Consultative Committee (CCC) Inland Rail meeting organized and controlled by ARTC. This two-hour meeting of 30th November 2020 in Brisbane had its agenda marked precisely to address "air quality" as one of the three main listed topics. I was then a formal active CCC member and the only air quality expert present at the meeting (apart from a very-misleading junior consultant working for ARTC).

2.11. As with the Brisbane Airshed impacts, the ARTC has again trivialised and misrepresented the air quality Narromine to Narrabri and other issues without engaging with me on any of my Submission.

2.12. Neither the ARTC, its employees nor its consultants have responded or attempted to contact me to discuss on either a professional or other basis, any of the many known serious issues relating to the Inland Rail. My concerns on these issues relevant also to New South Wales, have been sent to ARTC for their requested actions and responses and also provided in my Submissions to the NSW Government, the Queensland Government and the Federal Government.

2.13. There is a clear and consistent pattern of reprehensible behaviour from ARTC in totally disregarding and ignoring all professional advices about the impacts and costs of its project and just trying to bulldoze its way through the Environment, Economy and Community.

3. CONCLUSION AND RECOMMENDATION

3.1 ARTC has shown its deliberate continuing refusal to engage with professional and community expertise, by reproducing a RESPONSE Document with basically a "business as usual" plan for the Inland Rail.

3.2 The final words in my own earlier Submission (SUB14121034) of 6th February 2021 are still highly relevant :-

1. The project described in the N2N EIS is ultimately a train finishing its journey in Brisbane. What happens in the determination of the N2N EIS ultimately affects us all;
2. This project has no Queensland approvals;
3. The N2N EIS is not in the public interest and its impacts are unacceptable; and
4. The project should not be approved, and should be ordered to terminate at Newcastle.



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