



18 February 2011

Mr Lawrence Hannah
General Manager (Rail, Ports and Freight)
Department of Transport and Main Roads
GPO Box 1549
Brisbane Qld 4001

Submitted via email: RailPorts&Freight@tmr.qld.gov.au

Dear Mr Hannah,

Re: Integrated Freight Strategy for Queensland

The Chamber of Commerce and Industry Queensland (CCIQ) welcomes the opportunity to provide feedback into the Department of Transport and Main Roads' draft *Integrated Freight Strategy for Queensland*. CCIQ is strongly supportive of developing this strategy, particularly in light of the substantial growth in freight volumes that are predicted moving forward.

Queensland's transport system is an integral part of the community and has a large impact on the productivity, profitability and competitiveness of businesses. Considering the importance of the transport network to business, and the significant challenges that we face moving forward (ie growing population and freight task, rebuilding infrastructure following recent natural disasters), CCIQ is currently developing a transport blueprint to provide a Queensland business perspective on how to rebuild the state's transport infrastructure with a focus on delivering an even better transport system that drives business and economic growth moving forward. The feedback provided in this correspondence is based on the business input CCIQ received for the purposes of developing our transport blueprint.

Overall, CCIQ is supportive of the key objective of the draft strategy to move freight efficiently by the most effective and sustainable means. However, CCIQ believes this objective should be broadened to include a focus on ensuring the state's transport system is capable of accommodating the growth in freight volumes that are predicted. Furthermore, in addition to the three key requirements of freight solutions to be safe, affordable and environmentally sustainable, the Queensland business community would also support consideration of freight solutions that are reliable, capable of meeting demand and incorporate best practice methods.

The draft strategy outlines a range of issues and challenges that will impact on the transport system and influence sustainable freight solutions into the future. Although the draft strategy does not include an exhaustive list, Queensland businesses have also raised the following as key challenges impacting on the state's transport system that CCIQ would like considered within this strategy:

- Significant rebuilding efforts and flood mitigation activities that are required following recent events just to bring the network back to its former state;
- Meeting the needs of a growing economy and diverse industry base, which could potentially have different and competing requirements;
- The vast distances and low population density in Queensland which can significantly impair potential freight solutions;
- The poor quality and capacity constraints associated with some parts of the current transport network, particularly in regional areas;
- The current lack of attractiveness of some modes of transport for freight movement over others.

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CCIQ provides in-principle support for the key actions outlined in the draft strategy. Additional feedback on each of the six identified outcomes is provided below for consideration:

- *Integrated freight movement solutions:* Businesses often comment about the need for an integrated transport system that incorporates a more seamless link between modes of transport to make each network more accessible. In particular, businesses provide support for enhancing land transport connections to seaports and airports in order to create more efficient and reliable supply chain links for moving freight throughout Queensland, Australia and the rest of the world.
- *Optimum balance between transport system capacity and performance for freight:* Many businesses have raised concerns about the underutilisation of some transport networks in Queensland, particularly rail. In order to get the most out of infrastructure investments, CCIQ is strongly supportive of placing additional attention on ensuring existing infrastructure is used to its full capacity. Additional investments will be required in some areas in order to address current concerns and enhance the capacity of the existing network, such as quality issues and the need for flood-proofing. Business also support actions to reduce the costs involved in moving freight as a key method for enhancing the competitiveness of all freight movement options.
- *Queensland is well positioned for future freight needs:* It is essential that government maintains a forward planning approach to ensure the needs of the business community in relation to freight movement continue to be met into the future. A common criticism of the current transport system is that the network is struggling to keep pace with demand, with planning, maintenance and development over the past decade failing to meet the needs of the current and future population, resulting in "catch-up" activities. It is essential that this situation is rectified moving forward, with planning and development activities resulting in an efficient and reliable transport network that is capable of meeting the predicted growth in freight movement into the future. Another common concern raised by business is that Government is perceived to focus its attention (and investment) on SEQ, with areas outside of this region often placed down the priority list. As a result, CCIQ is strongly supportive of government placing additional attention on regional areas of the state where appropriate, and subsequently supports the Government's regionalisation strategy including a focus on meeting transport needs in regional areas outside of SEQ.
- *Sustainable freight movement:* CCIQ is supportive of reducing Australia's dependence on crude oil imports by promoting and assisting businesses to adopt viable alternatives in order to decrease our vulnerability to supply restrictions and shortages. The Chamber is also supportive of better managing the interaction between freight movement and the community, however it is essential that restrictions are not placed on heavy vehicles to decrease movements on the suburban arterial road network if no viable alternative routes have been identified or significant inroads made into reducing congestion on major arterials. Focusing on developing the workforce capability of the transport and logistics industry will also be essential as labour and skill shortages once again become a key issue moving forward.
- *Informed investment supports freight solutions:* CCIQ is supportive of the strategy looking at how private industry investment could be encouraged to create an improved freight network in Queensland. Businesses are also strongly supportive of government identifying freight network investment priorities and a timeline in which they will be delivered.
- *A cohesive freight environment:* The business community is supportive of enhancing the connection between local, state and national transport systems in order to create a more integrated system in Queensland. Improved data collection will also be essential to feed into the development of appropriate strategies and freight solutions. Overall, it is essential that the strategy is supported and actioned by the Queensland Government and links with national freight industry initiatives. CCIQ is keen to be involved in initiatives and solutions to ensure the future needs of the business community are met moving forward.

The Chamber appreciates the opportunity to provide feedback on the draft strategy outside of the consultation period. CCIQ is hopeful that the feedback provided in this correspondence, and the release of our Transport Blueprint in the near future, will be of assistance to the department in finalising the draft strategy.

If you have any questions regarding this correspondence, please do not hesitate to contact me on (07) 3842 2279. CCIQ looks forward to working with the State Government to deliver outcomes under Queensland's Integrated Freight Strategy.

Yours sincerely,



Nick Behrens
General Manager - Policy