

NARROMINE TO NARRABRI INLAND RAIL COMMUNITY CONSULTATIVE COMMITTEE

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18 December 2020

Mr Andrew Bourne
Assistant Secretary
Major Transport Infrastructure Projects
Inland Rail Stakeholder and Regional Delivery
Department of Infrastructure, Transport, Regional Development and Communications
GPO Box 594,
Canberra
ACT 2601

Dear Mr Bourne

I write to you on behalf of the Narromine to Narrabri Inland Rail Community Consultative Committee (N2NCCC) in respect of concerns raised at a recent meeting in respect of increases in costs of the Inland Rail project, having regard to the capital costings contained in the Melbourne–Brisbane Inland Rail Alignment Study Final Report (IRAS) upon which the project's business case and overall development has been based.

By way of background, the N2NCCC has been appointed by the NSW Department of Planning Industry and Environment as a conduit for community consultation with Inland Rail in the development of the Environmental Impact Statement for the project and operates under three Sub-committees, given the linear length of the project, each based on the major centres along the proposed N2N alignment – Narromine, Gilgandra, and Narrabri. The most recent round of N2NCCC Sub-committee meetings was held from 7 to 9 December 2020.

At the meeting of the Narromine Sub-committee of the N2NCCC on 7 December 2020, Community Member Andrew Knop provided the following statement to the meeting:

'My issue is the exponential increases in the business case capital cost.

The business case uses the IRAS for the base cost analysis. The base cost is tabled in the IRAS final report:

Section B. Route development and costing

Appendix C - Design standards and

Appendix J - Capital cost and delivery program.

Each construction section has a cost estimate summary which makes up the base cost for the entire Melbourne to Brisbane project.

ARTC have lodged EIS and developed project maps for all sections as they enter advanced planning phases. I have evaluated these documents and found alarming

disparities between the 2015 base construction estimates and today's 2020 requirements.

Our N2N section is in its formative stage, however in one structure alone the entire N2N bridging allocation has been used with 3.9 km of bridging needed at Narrabri when only 3.7km was allocated to the entire N2N alignment by the business case. Based on flood plain modelling requirements the Castlereagh river bridging will likely be 3 to 4km long and our Macquarie/Backwater Cowal should be a similar length. The requirements of only 3 of the 73 N2N bridging structures have used almost 300% of the allocation. 70 structures are still required.

These figures are replicated along the entire Melbourne to Brisbane (M2B) alignment with many sections being 400% to 1000% over. In total, the 2015 M2B cost estimates allowed for 9,601m of bridging. ARTC's 2020 documents list current bridging requirements at 35,442m. An additional 100 unspecified structures are still to be included. This total will likely reach 45 km.

Tunnelling is another easily referenced cost overrun with 6.6km originally budgeted and 8.6km required in 2020.

In the N2N project, all listed base costs have escalated - culverting, excavation and fill, track length, land acquisition and impact mitigation costs - adding significantly to the projects financial risk.

The Australian Government Inland Rail statement of expectation requires the project to be delivered with transparency, probity, accountability, and integrity. I am concerned these key delivery objectives are not being met. To my knowledge ARTC has made no attempt to inform the Australian Government or the community that major increases to the project's infrastructure requirements are occurring even when questioned on these issues by Senate estimates or the Rural Regional and Transport Inquiry into the management of Inland Rail.

The Australian Government statement of expectations are crystal clear in their requirements:

"The Government expects that ARTC will provide all necessary information, as part of its reporting requirements, to enable Shareholder Departments to meet their assurance obligations under the PGPA Act."

"ARTC will advise risks to Shareholder Ministers and Departments on an 'early warning' basis (including significant lead time on sensitive delivery issues), and engage closely with them, including by providing monthly progress reports and immediate reporting on significant events."

ARTC will "promptly disclose to Shareholder Ministers and Departments any material variance from its Corporate Plan assumptions or forecasts, along with other material events. Should ARTC become aware that there is a substantial risk that it will be unable to complete Inland Rail, or a major component of Inland Rail, within the parameters set out in either the Corporate Plan or this Statement, it must advise Shareholder Ministers and Departments immediately."

Why do I bring this up? The statement of expectations also states, *“Shareholder Ministers expect ARTC will publish progress reports, release updated construction plans and deliver briefings to the public to ensure a high level of community confidence.”*

I have been to every N2N Narromine Sub-committee meeting. ARTC has never mentioned the ballooning base cost to our community. This massively increased base cost fundamentally impacts ARTC's ability to complete the N2N, 310km greenfield section. Until these issues are transparently disclosed and evaluated how can the community have confidence that ARTC has the financial resources to complete this or any other financially compromised section.

I now bring this issue to the direct attention of ARTC, the Shareholder Ministers and Departments. If ARTC has disclosed these issues to the Shareholders Ministers and Departments then please brief our community as to the details and outcome of the findings. I have no confidence the project can finish what it has started and as such it places all our communities at significant risk.'

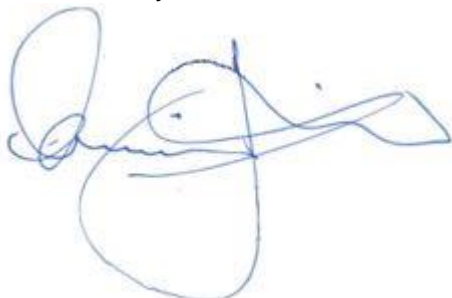
Similar comments to those made by Mr Knop were also expressed at the N2NCCC Gilgandra Sub-committee meeting the following day.

It is acknowledged that post the N2NCCC meetings that the Deputy Prime Minister, The Hon. Michael McCormack MP advised in a media release on 16 December 2020 that the Federal Government would provide an additional injection of up to \$5.5 billion of equity into ARTC. It is also noted that Inland Rail CEO Mr Richard Wankmuller said “This further investment will enable us to deliver the project to its fullest potential” indicating that the project will now include an extra 4,500 culverts, nine additional viaducts, a further 6.8km of bridges, 10 extra grade separations, and 450km of fencing.

The N2NCCC forwards the above comments for your review and despite the most recent media advice would appreciate your response as to how the matters of concern raised by Mr Knop have been and will continue to be addressed.

I look forward to your advice.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Michael J Silver', with a large, stylized flourish at the end.

Michael J Silver OAM
Independent Chair



Australian Government

**Department of Infrastructure, Transport,
Regional Development and Communications**

Dear Mr Silver

Thank you for your letter of 18 December 2020 passing on the concerns of Mr Andrew Knop regarding the developments on Inland Rail project construction estimates since the 2010 Melbourne-Brisbane Inland Rail Alignment Study (IRAS).

I apologise for the delay in my reply, it was important that I confirm the accuracy of our information and address Mr Knop's concerns regarding the financial resources of the Australian Rail Track Corporation (ARTC) and whether these are sufficient to deliver the project.

The construction estimates in the 2010 IRAS, as well as the 2015 Inland Rail Business Case, were largely based on desktop studies. You may be aware that the Australian Government's investment decision in the 2017-18 Budget was also based on this information. The Australian Government emphasised at the time that Inland Rail costs would not be finalised until procurements, alignment and reference designs were completed.

ARTC has now made significant progress in the design, planning and delivery of Inland Rail. Inland Rail's scope has been refined to enable the delivery of more culverts, bridges, grade separations and viaducts, many of which appear in the Reference Design for the Narramine to Narrabri (N2N) section. The Reference Design is informed by robust consultation with the community, which has included more than 1000 interactions between ARTC and local landholders and more than 40 community consultation sessions delivered over the past four years.

Extensive planning, engagement and numerous studies have informed the N2N design to the point where ARTC submitted the Environmental Impact Statement (EIS) and associated Reference Design for public exhibition. The EIS is a robust process conducted by the New South Wales Department of Planning, Industry and Environment that will consider the proposed design, assess the impacts of the project and seek community inputs. I note that the opportunity for community submissions in relation to N2N closed Sunday, 7 February 2021 and I understand a number of submissions have been received to inform this important process.

As you mention in your letter, the Government announcement of 16 December 2020 outlined the additional commitment of up to \$5.5 billion in Commonwealth equity for ARTC to deliver Inland Rail. This additional funding reflects the enhanced features and scope of Inland Rail and will support more than 21,500 jobs at the peak of construction.

Changes in Australian rainfall and runoff guidelines for infrastructure design, the requirement for additional earthworks and state government changes to biodiversity offsets have been

significant drivers in the enhanced design for the N2N project. The increased Government investment to ARTC will cover the enhanced features of Inland Rail including: the now identified and proposed 4 km long viaduct at Narrabri; the 1.2 km viaduct at Narromine and more than 70 additional structures required on N2N as listed in the EIS and depicted in the project fly-through available from the ARTC Inland Rail website inlandrail.artc.com.au/where-we-go/projects/narromine-to-narrabri/works-and-planning/.

Like other major infrastructure projects, the Inland Rail costs will evolve as planning, environmental approvals, detailed design and procurements are completed. ARTC reports regularly to Shareholder Departments through its Board and to the Australian Government. Robust governance and monitoring will continue to measure the delivery of Inland Rail against the program schedule and budget to manage risks.

While I note Mr Knop's concerns about the transparency of Inland Rail cost estimates, the Government is also cognisant that the early disclosure of detailed project cost estimates could adversely impact ARTC's ability to negotiate value-for-money terms as it establishes key contracts. Both concerns are legitimate and require judgment as to the appropriate balance in achieving the best public policy outcome. That being said, ARTC and the Commonwealth will continue to publicly report financial information regarding Inland Rail and the Commonwealth's investment in ARTC as part of their respective annual reports. Information regarding ARTC Inland Rail contract commitments are also published on their website at inlandrail.artc.com.au/opportunities/suppliers/awarded-contracts/.

In light of the Government's increased investment to deliver Inland Rail, stakeholders can be assured that ARTC is adequately resourced to deliver the program. I trust this addresses the concerns expressed by Mr Knop on this matter.

I would like to thank the N2NCCC's ongoing contributions to the community consultation process for the N2N section of Inland Rail. I appreciate the opportunity to continue working with the N2NCCC to support ARTC's delivery of the Inland Rail project and to maximise the benefits of this national infrastructure to the community and region.

Yours sincerely



Andrew Bourne
Assistant Secretary
Inland Rail Stakeholder and Regional Delivery Branch

12 February 2021

Thank you for the opportunity to contribute to the review of the delivery of the Inland Rail Program.

Introduction

I have lived in the Central West region of NSW since 1970's. Since 1992 I have had a strong involvement in regional Landcare activities supporting many local groups as an on-ground volunteer with native plant seed collection, tree planting and wetland rehabilitation projects.

For 15 years I was a Senior Catchment Management Officer with the Central West Catchment Management Authority before leaving to pursue personal biodiversity and cultural heritage project interests. Jenny and I continue to freely contribute to and host many Landcare and environmental field days.

Key theme comments are provided below with further details and examples available.

The final summary section offers preliminary observation to improve ARTC management, consultation and procedures for your consideration. Further detail available on request.

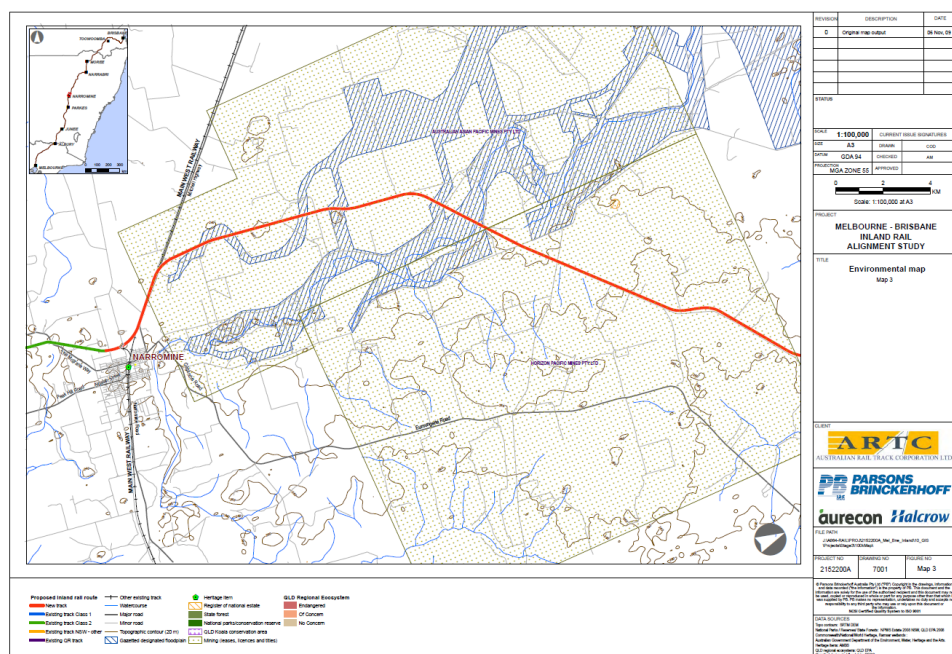
I thank the committee for consideration of the issues raised.

Yours sincerely
Andrew Knop

Key Theme 3: *The processes for the selection and refinement of the Inland Rail route and whether these processes are fit-for-purpose, including consideration of benefits and impacts.*

ARTC consideration of benefits and impacts tend to omit negative economic and community impacts see Theme 3: Consideration of benefits and impacts comments below.

1. 2010 Inland Rail Alignment Study analysed routes west and east of Narromine ref fig 1 below.



*“The alignment passes to the west of Narromine airfield and follows property boundaries across irrigated land for about 15 km until crossing the Macquarie River. The alignment would then cross several flood-prone areas near the Macquarie River. **An option to the east was considered but found to be less favourable from a land-use and flooding perspective.**” (IRAS 2010 Appendix E p.98).*

During the same period the 2010 western concept alignment was flood impacted on less than 1km of alignment approximately 5 times. Community photographs of flooding observation is provided in Attachment 1 for consideration.

3. In 2017 ARTC expanded the N2N alignment study area without informing the community or Shareholder Ministers / Departments. The 2016/17 MCA documents records ARTCs alternative study area options in a publicly released community 'Fact Sheet', ref orange hash area in fig 2 below. In late 2017 the alternative study area had inexplicably expanded by tens of thousands of hectares south of Narromine, compare adjacent fig 3.

Fig 2. 2016/17 MCA western alignment (red) and alternative study area (orange hash)

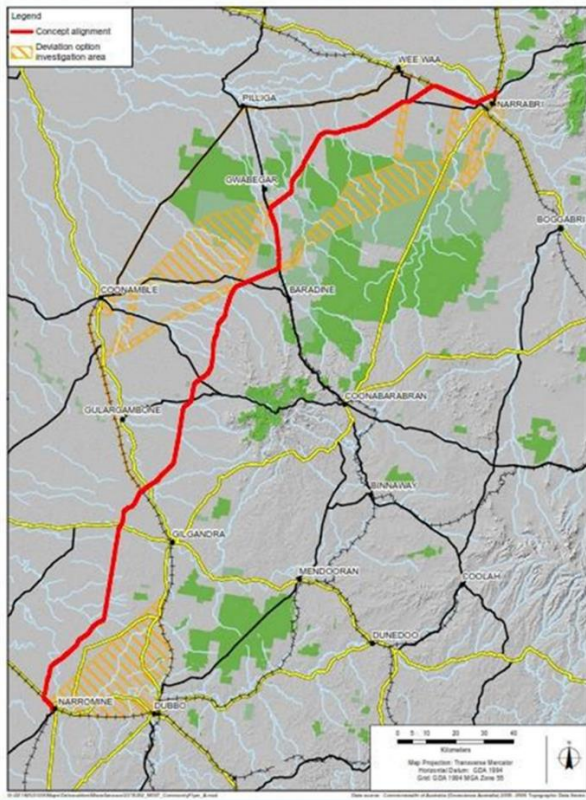
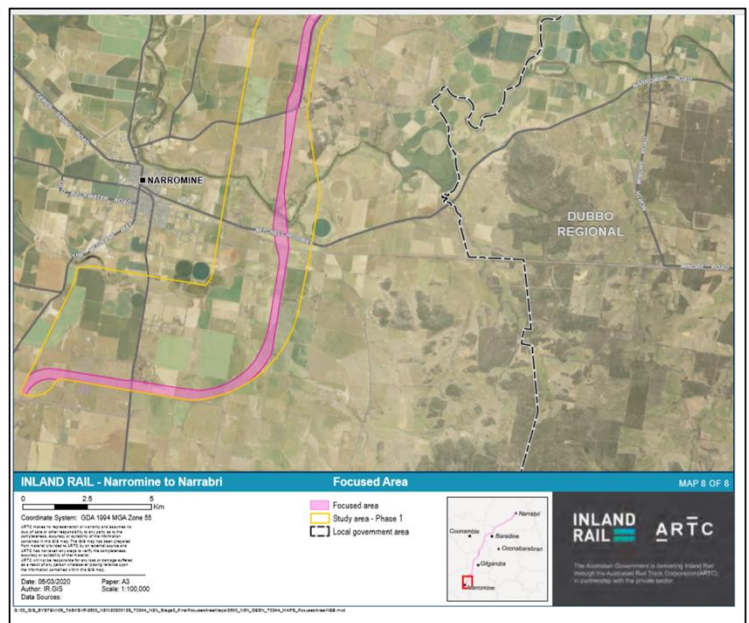


Fig 3. 2017 N2B Ministerially approved study area



4. ARTC 2016/17 Multi Criteria Analysis route selection process based their data on "assumptions". These assumptions included *"Consultation with all land owners in the study areas for the 2016 Concept Alignment"* with *"local feedback was that during flood events the river breaks its banks, resulting in wide scale flooding to the west."* MCA Workshop Report (15 Dec 2016). Concept alignment landholders were extensively consulted with substantial opportunity to raise flooding and other impact issues. The newly impacted eastern community had no such opportunity with the study area being expanded and the alignment moved without their knowledge. This represents a glaring and fundamental break down in the procedural processes of the IR project with ARTC failing to provide procedural fairness and creating demonstrable procedural bias.
5. Additional 2016/17 MCA issues which ARTC failed to disclose to the Shareholder Ministers:
 - a. No reference to local topographic mapping data which clearly indicate the extent and location of 'lands subject to inundation' south of Narromine directly impacting the 2017 N2B alignment option.
 - b. No reference to the gazetted Narromine to Oxley Flood Management Plan 2009 which documents flood extent, depth and velocity impacting the concept alignment. This plan was used to inform the 2010 IRAS, see blue hashing flood extent mapping in Fig 1 above.
 - c. No reference to the highly significant flood mitigation role 'Webbs Siding Outflow' provides Narromine and the Macquarie River. Located east of Narromine this outflow releases Macquarie River flood waters directly into the Backwater Cowal landscape and 2017 N2B IR study area.
 - d. No reference to the six, large convergent streams which comprise the Backwater Cowal including their 400 square km of elevated catchment which results in frequent and protracted flooding events S & SE of Narromine.

- e. No reference or analysis of how these convergent streams would interact with Macquarie River Webbs Siding outflow flood waters.
- f. ARTC's 2017 MCA substantially overstated the flood risk, extent and magnitude impacting the western concept alignment.
- g. ARTC's 2017 MCA substantially underestimated the flood risk, extent and magnitude impacting the eastern 'alternative' alignment.
- h. ARTC's MCA failed to disclose the true track length, household/farming impact, infrastructure requirements and transit time for the N2B section of N2N.

Consideration of benefits and impacts.

General observation. ARTC's documents and consultant studies tend to make unsubstantiated claims regarding employment benefits, trucks removed from roads and other benefits. The community is sceptical that IR will successfully divert road traffic onto rail as much of the mining and rural produce quoted in ARTC IR freight predictions already use rail. ARTC claims are fundamental to the business plan and require detailed analysis and explanation.

ARTC documents contain glaring omissions regarding negative impacts of the IR project. Examples include:

1. Permanent closure of existing regional road access;
2. Permanent additional regional roads safety risks due to substantially increased level crossings with exposure to 115kph super freighter operations;
3. Permanent decrease in regional road efficiency due to level crossing issues combined with the hundreds of km of circuitous road realignments required for level crossings management;
4. Substantial escalation of heavy vehicle movements in and around intermodal locations with implications for regional safety, noise, vibration, air quality and congestion;
5. Quality of life and potential valuation impacts where properties neighbouring the project are impacted but not eligible for compensation;
6. Permanently increased farming operational cost and safety risk as farming operations are forced onto public roads due to property severance issues;
7. ARTC base cost planning failures which have substantially underestimated the infrastructure, administrative and environmental costs of the project. These cost escalations are measured by tenfold increases with some cost items not even considered. Cost escalations of this magnitude significantly impact the projects ability to meet its Equity Financing Agreement requirement, issues which require transparent disclosure and evaluation by the Shareholder Ministers and parliament.
8. The significant infrastructure escalations have in perpetuity implications for IR operations and maintenance cost with every bridge, culvert and crossing point requiring annual safety inspections. It is unlikely that this IR cost increase has been transparently disclosed and considered by the Equity Financing Agreement.
9. At Narromine two new approved rural residential subdivisions were halted by the unconsulted eastern alignment change. East Narromine has easy and very desirable access to Dubbo and prior to IR represented great potential for Narromine to attract rural lifestyle investment. When asked about this at a N2N CCC meeting ARTC had nothing to say. It has since been notice that the issue was hidden in an MCA table with a comment that compensation to the impacted parties maybe required. The issue never rated a mention in ARTC 'Route History' or any cost benefit analysis.
10. Permanent biodiversity losses and climate change impacts through clearing and fragmentation of our woodland and grassland remnant vegetation communities and wildlife habitat destruction. This includes impacts to several Matters of National Environmental Significance (MNES) which ARTC controversially ignored in their response to submission documentation (SPIR).

Key Theme 1: ARTC governance and management arrangements for the delivery of the Inland Rail Program.

Comment: The Inland Rail has several documents which underpin project governance. With reference to these documents the community has serious concerns that ARTC have not met its project requirements.

An example of this is the Australian Governments 'Inland Rail Australian Rail Track Corporation Limited Statement of Expectations' (IR SoE). This document sets clear governance requirements regarding transparency, accountability, integrity and probity conduct.

Additionally the IR SoE has clearly articulated requirements for reporting and disclosing planning variations:

"It is expected that ARTC promptly disclose to Shareholder Ministers and Departments any material variance from its Corporate Plan assumptions or forecasts, along with other material events."

"Should ARTC become aware that there is a substantial risk that it will be unable to complete Inland Rail, or a major component of Inland Rail, within the parameters set out in either the Corporate Plan or this Statement, it must advise Shareholder Ministers and Departments immediately"

The impacted community observed with great concern the conduct of ARTC corporate executives in Senate Estimates and the Parliamentary inquiry into the "Management of the Inland Rail project" where they potentially misinformed these committees regarding easily identifiable key risk and material variations to the corporate plan assumptions/forecasts. By early 2019 it was evident that the corporate base cost forecast, as described in the IRAS and IRIG planning documentation, was significantly escalating in every IR project section. This comparison information was readily available on ARTC's project web pages and associated EIS documentation.

Our N2N Community Consultative Committee (CCC) members had heard from confused and frustrated landholders that IR infrastructure commitments such as crossing points, flood plain bridging and grade separation structures negotiated with ARTC were being withdrawn when property infrastructure maps were sent to landholders many months later. Landholders now found they had no way to cross their property, flood plains were being blocked by enormous embankments and main arterial roads disrupted by dangerous and inefficient level crossings. We undertook a comparison analysis of ARTC's current IR infrastructure requirements against the planning documentation and discovered massive escalations in every major infrastructure category, with some major cost items completely unbudgeted.

CCC members took these findings to next N2N CCC meeting as we were concerned that ARTC were cost shifting to communities by refusing to provide suitable and adequate infrastructure. At the meeting we read a prepared statement which was resolved to be submitted to the infrastructure Shareholder Department for response (see Attachment 2).

One week later, Michael McCormack MP advised in a media release that the Federal Government would provide an additional injection of up to \$5.5 billion of equity into ARTC with Mr Richard Wankmuller quoted as saying "This further investment will enable us to deliver the project to its fullest potential" with Mr Wankmuller indicating that the project will now include an extra 4,500 culverts, nine additional viaducts, a further 6.8km of bridges, 10 extra grade separations, and 450km of fencing. Shortly afterwards, Mr Wankmuller resigned from the project.

The Shareholder Department sent our CCC a letter 2 months later assuring us that the project was now sufficiently resourced to meet its planning and construction cost requirements, see Attachment 3. ARTC released the N2N EIS documentation at the same time so community time and energy was directed toward preparing submission responses to this document. ARTC's EIS was roundly criticised for its inadequacy and errors and was described by NSW Farmers/ CWA Special Counsel as the "worst State Significant Infrastructure EIS he had seen in his decades of experience". It took ARTC a record 18 months to compile a response to submission document which again has been widely deemed inadequate and is marred by false and misleading statements.

The release of the N2N EIS completely rewrote the base construction cost scenario for the entire IR project. The construction estimates in our Attachment 2 letter proved to be conservative see Table 1 below. It is also important to note IR cost shifting still significantly impacts our regional communities.

Table 1.

Inland Rail 2015 IRIG Business Case

IRAS 2010 Appendix J (p.32)

Table 6-3 Narramine to Narrabri North construction cost estimates

Type of works – Greenfield	Length – 306.8 km
Contract type – Design and construct	Duration – 112 weeks
Earthworks Excavation: 915,000 m ³ Fill: 3,039,000 m ³	Bridges and culverts 15 – 50 m – 33 off, 855 m total length 51 – 150 m – 22 off, 870 m total length 151 – 300 m – 9 off, 1,975 m total length Culverts – 180 off, 560 m total length
Track and formation Class1C track –306.8 km Turnouts – 9 off Loops – 7 off	Tunnels None
Level crossings and road crossings Minor road crossing – 2 off Active level crossings –3 off Passive level crossings – 106 off	Miscellaneous structure Road re-alignments – 1.8 km Road closures – 15 off
Cost per km- \$2,468,000	Total cost - \$757.3m

N2N 2010/15 Business Case base cost evaluation

Bridging: 3,700m Total
 Culverts: 560m Total
 Road re-alignments: 1.8km Total

2022 N2N Actuals

Bridging: >15km
 Culverts: >13km
 Road re-alignments: 40km
 Additional uncoded items
 > 200 utility adjustments
 > 30km of culvert scour protection
 > 400,000 environmental offset credits required

The hard reality for the Inland Rail project is the N2N section alone requires substantially more construction allocation than was planned for the entire 1700km Inland Rail M2B. Mr Wankmullers rough and ready analysis of an extra 4,500 culverts, nine additional viaducts, a further 6.8km of bridges, 10 extra grade separations, and 450km of fencing being “sufficient to deliver the projects fullest potential” will not even cover the infrastructure blow outs for the N2N. Mr Bournes letter is concerning, he had 2 months to review the McCormack/Wankmuller response and thoroughly analyse the base cost business plan issues. His statement and conclusion “In light of the Government’s increased investment to deliver the Inland Rail, stakeholders can be assured that ARTC is adequately resourced to deliver the program” is completely misguided.

The IR review team need to be aware that Mr McCormack’s, Wankmullers and Bournes assessment of this ‘derailed from the start’ project continues to be ‘off the rails’. In 2021 all four QLD sections of IR had their EIS immediately returned by the assessment agencies as inadequate. Currently all QLD projects are on their 2nd project lapse extension and will not be released for public comment and submissions until well into 2023 at the earliest. When they are released a Pandora’s box of new infrastructure requirements will surface, ones that will likely eclipse the N2N escalations. At what point will the IR project get a handle on these cost escalations and meet its documented governance and disclosure requirements?

Our communities and the impacted citizens are listed in the IR SoE as key stakeholders, we would appreciate being treated as such.

Additional governance issues: The issues below have broad application for the entire M2B alignment.

1. ARTC’s failure to provide newly impacted individuals meaningful and timely consultation prior to altering study areas and alignments;

2. Demonstrable procedural bias wherein ARTC provided certain individuals substantial consultative opportunity which enabled those parties to have the alignment changed;
3. False and misleading information published in the ARTC 'Route History' document;
4. ARTC's refusal to answer MCA and route selection questions during Inland Rail Community Consultative Committee (CCC) meetings;
5. ARTC's systemic failure to meet State planning CCC reporting requirements;
6. ARTC's devolving questions and issues raised in CCC meetings as a responsibility of the Federal Inland Rail senate inquiry;
7. ARTC's misleading landholders during the route selection process;
8. ARTC's misleading landholders during property negotiations;
9. ARTC's failure to research significant and potentially beneficial alternative route alignment options;
10. Significant IR project cost escalations resulting in cost transfer to State, Local government, regional communities and landholders;
11. Potential corporate governance failures relating to the significant cost escalations;
12. Transparency and probity issues regarding ARTC's procurement procedures;
13. Misleading claims and statements in ARTC's IR project EIS documentation;
14. Flood modelling and design concerns which increases risk to life and property;
15. ARTC's disregard of community submissions which identified matters of National Environmental Significance impacts overlooked by the projects EIS.

Summary and solutions.

Background: The Inland Rail project commenced badly in late 2017 when it dropped a bomb shell on the N2N community with it's sudden and unconsulted alignment moves. 250 community members attended the N2N announcement at Narromine, many were angry, some were in tears as they listened to ARTC rhetoric that this nationally significant project had full parliamentary support and the Minister had made his decision regarding the alignment and it was final.

These bombs shells were dropped on many other communities, notably the green field projects from North Star to Kagaru. All these communities are very unhappy with ARTC conduct and performance and a review of EIS submissions for any IR projects shows startling consistency. Many people and organisations are objecting, not against the Inland Rail project concept per se, but about the treatment they have received from ARTC. Even submissions which supported the project produce lists of ARTC professional failings, some very long. As new communities were impacted ARTC's heavy handed approach and failure to follow through with negotiated outcomes became systemically obvious. In 2019 it came to senate estimates attention that ARTC had expended considerable IR project resources undertaking 'empathy training'. This was a draw dropping moment for the senators with many showing concern that a government agency needed such training. The Hansard of the senator's discussion with Dr Taylor yields some insight into why this may be the case (R & RA T Monday, 21 October 2019).

Did this considerable investment of IR finances, resources and time yield a qualitative result? From our CCC and community experience it appears to have made no difference. Landholders and community were still being refused answers on procedural questions and misinformed with misleading commentary in the EIS and SPIR and ARTC reneging on negotiated outcomes. NSW Farmers Special Counsel stated outright in their N2N 2022 SPIR submission *"The community engagement undertaken by the ARTC in relation to the N2N Project continues to be appalling."*, *"Community consultation is a fundamental feature of the assessment regime for SSI. The approach that is continued to be advanced by the ARTC falls well below the threshold for what is acceptable."*

Solutions

My observation is ARTC issues are due to lack of management skill, staff on ground experience, governance procedures and an over reliance on marketing jargon and techniques. ARTC turn up to meetings with no design details or insight. They make no verifiable records and leave stakeholders hanging in limbo for them only to find ARTC wasted their time and nothing tangible was achieved, *“two years of negotiation with different people and still no access across my property”*. There are many, many instances of this.

Our CCC asked ARTC to provide evidence of Standard Operating Procedures for the consultation process and any supporting quality control measures. They responded by saying they keep databases of all discussion points. My take is they have no SOP's or QA procedures and I find this very concerning. Several landholders asked them to minute their discussions and send record of the negotiated outcomes. To date nothing has eventuated. This is extremely unprofessional.

At a minimum the project needs to:

1. Train staff and action all IR governance requirements;
2. Develop and implement comprehensive SOP and QA process for all project tasks;
3. Comprehensively prepare for property visits and have all relevant material at hand;
4. Clarify exactly what staff are permitted to negotiate;
5. Promptly send written confirmation to stakeholders of the negotiated outcomes and/or pending issues;
6. Promptly inform stakeholders if issues arise with any of the above steps and facilitate solutions.

Narromine to Burroway (N2B)

Inland Rail alignment east / west flood impact comparison & summary

Inland Rail Alignment Study 2010

“The alignment passes to the west of Narromine airfield and follows property boundaries across irrigated land for about 15 km until crossing the Macquarie River. The alignment would then cross several flood-prone areas near the Macquarie River.

An option to the east was considered but found to be less favourable from a land-use and flooding perspective.”

IRAS Appendix E Sect 4.4.2

The following images summarise why the original IRAS 2010 report recommended the alignment go west of Narromine.

It is important to note the entire eastern alignment study area is flagged by topographic mapping and the 2009 gazetted flood management plan as an area with unique and substantial flood risk.

Local landholders were not consulted prior to ARTC moving the alignment to the east and had no opportunity to provide local knowledge to help inform the alignment selection process.

ARTC failed to disclose these issues when they petitioned the Shareholder Ministers in 2017 to change the alignment.

N2B green field alignment - Wallaby Rd 5th March 2020 – 68 mm of rain over 48hrs (BoM: Dubbo AWS gauge No. 065070).
Extensive alignment flooding to 50cm depth, velocity range 0.5 to 1.5 meters per second.



N2B Wallaby Rd 4th April 2020 – 73 mm over 48hrs (BoM: Dubbo AWS gauge No. 065070). Too dangerous to navigate further than Dappo Rd with flood water up to 1m deep. Road access closed until October due to repeat flooding events.



N2B Webbs Siding Rd 9th Oct 2022 – 106 mm over 5 days (BoM: Dubbo AWS gauge No. 065070).



N2B Wallaby Rd & Dappo Rd 9th Oct 2022 – 106 mm over 5 days (BoM: Dubbo AWS gauge No. 065070).
Images 10 hrs after peak flow, flood depth and velocity too dangerous to proceed.



Tantitha & Pinedean Rd 11th Oct 2022 3 days after peak flow event.

Flood peaked 90cm over Tantitha & 1.5m over Pinedean Rd's. Extensive and widespread road and infrastructure damage.



N2B Backwater Cowal, Tomingley Rd 9th Oct 2022 – 106 mm over 5 days (BoM: Dubbo AWS gauge No. 065070).

All roads south of Narromine closed by potentially life threatening flooding. 16km of the new IR alignment inaccessible for the eighth time in 10 years (NB 2 repeat events have occurred since this date).

Over the same 10 year period **the original IRAS western concept alignment had limited flooding and zero life threatening events** with flood risk confined to the Macquarie River channel.

NB the Macquarie River impacts are common to both alignment options.



N2B IRAS western concept alignment, 9th Oct 2022 – 106 mm over 5 days (BoM: Dubbo AWS gauge No. 065070).

All roads accessible with minimal alignment flooding.



The concept alignment, 9th Oct 2022 – 106 mm over 5 days (BoM: Dubbo AWS gauge No. 065070).

All roads accessible with minimal alignment flooding.



The concept alignment, 9th Oct 2022 – 106 mm over 5 days (BoM: Dubbo AWS gauge No. 065070).

Image 4 shows largest impact area with approx. 200m of stationary water up to 20cm deep.



The western concept alignment, 9th Oct 2022 – 106 mm over 5 days (BoM: Dubbo AWS gauge No. 065070).

The IRAS 2010 flooding assessment and decision to reject the eastern Narromine alignment was well founded.

ARTC's 2016/17 failure to disclose the original IRAS findings, consult eastern alignment landholders, topographic mapping and relevant Flood Management Plans fails the projects documented corporate governance requirements, we request an investigation into ARTC's conduct.

