14 April 2014

The Chairman
Economic and Industry Standing Committee
Legislative Assembly
Parliament House
PERTH, WA, 6000

Standing Committee on Economics and Industry 'Inquiry into the management of WA's freight rail network'

The Wildflower Society of Western Australia (Inc.) (Wildflower Society) is a non-profit community organisation that was established in 1958 for the purpose of encouraging the conservation and preservation of Western Australia's unique flora. The organisation's membership base currently stands at over 700 members.

The Wildflower Society would like to thank you for this opportunity to provide comment on the *Inquiry into the management of WA's freight rail network.* The inquiry presents an opportunity to review and revise the funding and management of the biodiversity adjacent to the rail network in WA. The Wildflower Society supports the inquiry and welcomes the initiative.

IMPACT OF CLOSURE OF TIER 3 RAIL LINES

The government is closing a number of Tier 3 railway lines transporting grain to regional receival points. The apparent reason for this decision is that the required upgrade of the rail lines is too expensive and an inappropriate expenditure of government funds.

The consequences of this decision are that grain will need to be transported by road to the regional receiver points or to the ultimate destination. Many of the roads that would be used would need to be, or already have been, substantially upgraded and widened to accommodate the increase in heavy traffic. As a result, much of the remnant native vegetation in the often narrow road reserves would be removed or even eliminated.

Native vegetation provides many environmental benefits, as well as attracting tourists from all over the world to view our stunning wildflowers. Many tourists come to Western Australia to see the wildflowers, not just the everlastings in the Murchison or north-eastern wheatbelt, but are finding it increasingly difficult to find wildflowers in the southern sandplains and eastern wheatbelt because of increasing road verge widening.

This could be reversed by planting spectacular wildflowers on farms and on road verges, allied with associated activities such as wildflower tours, bed and breakfasts, cafes, historical

machinery displays, and art and craft products. Tourist income generated by such activities could be of substantial benefit to rural communities, supplementing the income of farmers.

Jorg Imberger (2014) made the point that “Tourism is currently valued at $6 billion a year. With proper development this could easily be trebled to $18 billion. The Europeans, Americans, Chinese would all pay a premium to just once in their lives see what the beauty of nature used to be like on this Earth. Can you imagine the potential of this space and biodiversity in 20 years when every place on Earth is crowded?”

Yet, many Eastern States members of our national body, the Australian Native Plants Society (Australia), have written letters to WA state Ministers and Members of Parliament complaining about the accelerating pace of road verge clearing and the rapid loss of vegetation and our spectacular wildflowers.

Perhaps railway lines need to be retained, not just to transport grain during the harvest season, but to transport tourists during the wildflower season.

Native vegetation is already under threat and under represented in wheatbelt shires. Mapping undertaken by the Roadside Conservation Committee (WA Atlas) shows roadside vegetation of high conservation value frequently occurs throughout the wheatbelt. Many of the remaining areas of native vegetation in the wheatbelt are small islands surrounded by farmland. Roadside vegetation often provides habitat for rare and threatened flora, especially in the Wheatbelt.

More than 50 per cent of threatened plants have at least one population on a roadside, and some species are dependent on roadside vegetation for their continued existence.

One example is the Endangered Cunderdin Daviesia, *Daviesia cunderdin*, of which there are only two populations, one natural containing 9 plants and one translocated containing 13 plants (DEC 2009). The natural population of *Daviesia cunderdin* is located on a narrow road reserve, less than 5 m wide in places. This population is threatened by grading and indiscriminate spraying of weeds.

In addition, roadside vegetation provides ecological corridors for the movement of fauna and flora seeds and pollen which are unable to move to other areas of native vegetation when they are too far apart and not linked by "stepping stones" or corridors. Further clearing of this vegetation for road upgrades and widening is very undesirable. The impact of clearing in the wheatbelt on the biodiversity of species and provision of habitat is considered to be so significant that in 2000 the Environmental Protection Authority released a Position Statement stating it is ‘unreasonable to allow further clearing to be undertaken in the agricultural area’.

The Wildflower Society questions the relative economics of upgrading the Tier 3 railway lines and upgrading the country road freight routes instead. Further, the Wildflower Society believes the 2009 Strategic Grain Network Committee report failed to consider all of the road safety impacts, economic impacts, environmental impacts and the social/amenity impacts of the recommended line closures.

Even with road upgrades, road safety may be compromised by the closure of the Tier 3 rail lines because of the potential conflict between heavy vehicles, school buses and light vehicles.

Roadside vegetation also has benefits for local communities. It provides farmers with shade and shelter for their animals and crops, and prevents soil erosion. The visibility of roadside

vegetation can provide locals with a defined sense of place based on easily identifiable characteristics they recognise as “home.

Further, the amenity of many country towns may be adversely impacted through the high noise levels generated by the more frequent heavy road freight traffic.

An independent cost/benefit analysis needs to be undertaken of the relative merits of upgrading the Tier 3 railway lines and upgrading the country freight routes. This should include incorporating, and if possible monetising, the environmental and social costs and benefits, and assessing the whole of life costs associated with operating and maintaining the respective systems. It should also examine the ability to pay and thus the overall viability of the respective systems.

Nevertheless, the Wildflower Society is of the view that the maintenance and continued usage of Tier 3 rail lines is the most appropriate option for grain haulage from a biodiversity conservation, social and safety perspective. Therefore, the management of WA’s rail freight network should include maintaining, utilising and upgrading the Tier 3 rail network.

MANAGEMENT OF RAIL LINES

There is considerable doubt and uncertainty regarding the obligations on different parties with respect to the management and responsibility for different elements of the rail network, eg the rail reserve, the rail line, the track, the access road.

Specifically, it is our understanding that there is considerable doubt and uncertainty regarding the management and responsibility for the remnant vegetation in the rail reserve. This relates to both maintaining the quality of the existing vegetation as well as for revegetating degraded vegetation within the rail reserve. Certainly, the current operator, Brookfield Rail, denies that they have any obligation to undertake any management activities such as weed control, fire management or revegetation in the remnant vegetation in the rail reserve.

The remnant vegetation in rail reserves is, like that in road reserves, of high conservation value, especially in the Wheatbelt, and often contains threatened flora species. Rail reserves are often wider than road reserves,

The Wildflower Society submits that more clarity is required in this area, and that if responsibility for weed control, fire management and revegetation of degraded areas in the rail reserve is not included in the current Contract and Terms and Conditions for operation of the rail network, then the Contract needs to be re-negotiated and specific clauses need to be inserted or appended to the Contract to ensure that this is also the responsibility of the rail operator.

SUPPORTING RAIL NETWORKS

There are many substantial sustainability benefits of carrying heavy freight by rail such as improved energy efficiency; when compared to other forms of surface transportation, moving freight by truck is the most fuel-intensive mode (US DoT 2010) with rail 1.9 to 5.5 times more fuel efficient than trucks (FRA 2009).

Nevertheless, there are substantial dis-incentives to the use of rail lines to transport freight, such as double handling and speed for short-haul assignments. More initiatives need to be implemented and more incentives need to be provided to move bulk goods by rail. These

might include tolls on roads or large trucks to recover the true cost of road construction and maintenance, or direct support for rail transport (Pro-Rail Alliance, 2007).

Efforts should also be made to improve the viability and profitability of the rail network by expanding or maintaining the range of goods, especially bulk goods, such as livestock, lime, limestone, gypsum, salt, fertiliser and mineral sands, transported by rail.

SUMMARY

In summary, the Wildflower Society supports the retention, upgrade and maintenance of WA's freight rail network over the expansion and upgrade of the road freight network for its greater sustainability benefits, including the conservation of biodiversity. Further, the Wildflower Society believes that the management, maintenance and improvement of rail reserve native vegetation should be the responsibility of the rail operator, and this responsibility should be reflected in the Contract and Terms and Conditions of the lease of the rail network.

Yours sincerely

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REFERENCES

Department of Environment and Conservation. 2009. Cunderdin Daviesia (Daviesia *cunderdin*) Recovery Plan. Department of Environment and Conservation, Perth, Western Australia.

Federal Railroad Administration. 2009. Preliminary National Rail Plan. The Groundwork for Developing Policies to Improve the United States Transportation System. October 2009.

Imberger, J. 2014. The Weekend West, Perth, General News, page 76. 11 Jan 2014.

Pro-Rail Alliance. 2007. From Truck to Train. 12 Examples Of Successful Modal Shifts in Freight Transport. Accessed March 2014 from http://www.unife.org/uploads/From_Truck_to_Train.pdf

US Department of Transportation. 2010. Federal Railroad Administration. National Rail Plan. Moving Forward. A Progress Report. September 2010.

WA Atlas. www2.landgate.wa.gov.au/web/guest/wa-atlas. Accessed 14 April 2014.