

Record of oral submission to the Australian Competition and Consumer Commission (ACCC)

**One Rail Australia (FLA) Pty Ltd and Ors application for revocation and substitution
AA1000644**

Submission: Linfox

Date: 9 October 2023

Linfox operates an intermodal business which includes rail, road, and some coastal shipping transport. They own rolling stock and offer a range of services, including pick-up and delivery services. Linfox has contracts with Aurizon and Queensland Rail.

Linfox is supportive of the proposed conduct, as it would result in benefits such as:

- improving the bargaining power of the collective bargaining group against monopoly providers
- increasing transparency about access to below rail networks
- increasing accountability regarding what networks are being invested in and how service disruptions affect business
- ensuring logistical issues are more likely to be investigated and resolved in a timely manner.

Linfox expects that any benefits that may arise from collective bargaining would be passed through to it.

Linfox recently went through a tender process and considers that above rail providers are fairly competitive with each other. Linfox notes that above rail also competes with road transport. In their opinion, increased investment in road infrastructure compared to rail has made rail a less competitive option over time, so any improvements to rail network infrastructure that may arise due to collective bargaining would also increase the ability of rail to compete with road.

Linfox does not have concerns with the proposed collective bargaining. Linfox would have concerns if the information to be shared related to specific customers or volumes. However, Linfox does not anticipate that the above rail providers would share information about volumes or customers, as it would be disadvantageous to their business interests.