

3.7.39 DF/R に対する MOR コメントの受領にかかわる調整業務（2007年10月10日）

MOR の DF/R に対するコメントは2007年10月10日深夜になって調査団側に提出された。MOR 側は10日午前中に各担当および DFCCIL からのコメントを Verma 顧問が集約し、それを Verma 顧問 / Pillai 部長 / Beck 課長が取りまとめの作業を行っていた。しかしながら翌日に国会での来年度予算の説明が予定されており、このための資料を平行して作成しなければなかったこと、またドイツからミッション対応もあり、コメントの内容の吟味や取りまとめに十分な時間を避けなかった模様であった。一時は10日中にコメントを調査団側が「受領するのは難しい状況となったが、統合マネジメントでは仲野団員を MOR に待機させ、交渉を行った。この結果、Pillai 部長が10日夜に帰宅中の Jena 総裁の自宅まで出向いてコメントに対する決裁サインを所得し、10日深夜に調査団が受領することができた（次頁）。受領した MOR コメントは同日中に JICA、ODA 関連3省、JBIC に配信した。

**GOVERNMENT OF INDIA
MINISTRY OF RAILWAYS
(RAILWAY BOARD)**

No. 2006/Infra/32/1

New Delhi, dated 10th October 2007

To
Team Leader,
JICA Study Team,
Gurgaon

Dear Sir,

Sub:- Ministry of Railways Remarks on the Draft Final Report

Enclosed herewith are the comments of the Ministry of Railways on various important technical and other issues contained in the Draft Final Report. JICA Study Team may consider the same for suitable incorporation in the Final Report.

Yours Faithfully,



(Girish Pillai)

Exec. Dir., Perspective Planning
Railway Board

Encls.: as above

Comments of Ministry of Rail ways on JICA Draft Final Report

SN	Issue	Comments of Ministry of Railways
1.	Phasing of Project	Phasing is a part of any project implementation. However, it is clarified that the basic purpose of the project is connecting ports on the west-coast to the northern hinterland through Western Corridor and connecting production centers in the East to the consumption centre in the North through Eastern Corridor. Any phasing is acceptable so far as it does not compromise this basic principle. Phase 1(a) does not include Khurja-Dadri rail link. The link will be required for moving north bound coal traffic from eastern region. At Khurja, the junction arrangement will be needed in Phase-1(a) between the existing Dadri-Khurja section and DFC. Expenditure on this junction arrangement will be avoided if Khurja-Dadri is made part of Phase-1(a).
2.	Double stack container system for Western Corridor	Double stack container on Indian Railways is in operation on flat wagons at 75 kmph. Trials have been conducted for enhanced speed and axle load. The flat wagons on broad gauge system has inherent advantage of better stability as compared to standard gauge. Trials conducted recently by Indian Railways indicate that double stack container movement on flat wagons are stable even at higher speed. The movement on flat wagons has inherent advantage in terms of higher through put and reduced unit cost per TEU. In view of this Ministry of Railways is of the view that double stack container on flat wagons is more suitable for Western Corridor.
3.	Electric traction for Western Corridor	Ministry of Railways has taken a decision on Maximum Moving Dimension for DFC routes which will take care of OHE requirement at a later stage. Although it is technically feasible to provide OHE for DSC operation on flat wagons as advised by JICA, the design is not a tested one. Ministry of Railways is of the view that electrification of Western Corridor can be considered only at the stage when tested and proven technology is available.
4.	Container transportation system for Eastern route	Ministry of Railways agrees to the JICA recommendations.
5.	Loop length	Ministry of Railways is of the view that 1500 m loop length will be required for moving longer trains. Ministry of Railways is however open to the idea of

		initial implementation with 750 m loop with provision in the plan for extension to 1500 m.
6.	Automatic train detection and alarming system for improving level crossings	In Indian conditions replacement of level crossing gates by ROBs/RUBs will be required where road traffic justifies the same. Mere replacement of level crossings by automatic level crossing gates will not be sufficient for smooth functioning of DFC in Indian conditions. The existence of level crossings will also create problems of double controlling by gatekeepers for stations on the existing alignment and on the DFC.
7.	New railway line for connecting TKD ICD	JICA report has indicated substantial volume of container traffic required to be moved to/from TKD. Connectivity to ICDs from DFC will be market driven and on projected traffic. As and when plans for new ICDs in NCR region are finalized by private container operators, the decision to connect TKD ICD can be suitably reviewed.
8.	Price Escalation	Although, price escalation has been taken in the JICA estimate, it is not clear whether the revenue stream based on the available tariff rate and the working expenses have also been escalated for calculation of FIRR.
9.	Freight fares for commodities	The freight fare of commodities as listed in the JICA Report does not match with the present Indian Railway Freight Tariff Table. The same may kindly be cross checked.
10.	Cost Per TEU km for well type wagon is same that of flat type wagons	The tare weight of well type wagon has been taken as 18.6 tonne although it is 21.8 tonne in China on standard gauge. Factoring the proper tare weight for well wagons, cost components on account of energy cost and O&M cost will go up by 10.7%. Also, 34 wagons have been taken in one rake of well type wagons whereas only 32 can be accommodated in existing loop line. The locomotive requirement for clearing the same volume of traffic with well type wagons will also be much more. In view of this, the cost per TEU km for well and flat type cannot be the same and may be reconciled.
11.	Suggested Re-settlement and Re-habilitation policy (R&R)	At present railway project do not require any environmental clearance. JICA study team had undertaken an assessment of likely social and environmental impact to be caused by the project as per their guidelines. The study is for the purpose of appreciation of lending agencies. The study is not as per the guidelines of Ministry of Environment and Forest and hence it has been considered only for the purposes of information.

		<p>JICA has suggested R&R policy on the basis of NRP 2006 which is not an approved document as of now. At present the project compensation in railways is governed by Land Acquisition Act 1894 and National Policy on R&R of 2003. The R&R package indicated at variance with the applicable for railway projects. As and when the proposed new policy becomes an Act of the country, it will be implemented accordingly. Financial repercussions will be absorbed at the revised estimate stage.</p> <p>There may be no need of setting up a separate management team at various levels for implementing any R&R scheme. However, DFCCIL may consider entering into a general long term contract with agencies of repute for undertaking field works, coordination with State Govt. and public representatives as required in relation to ESIMMS/R&R studies.</p>
12.	Additional cost on electric locomotives, financial interest during construction, price escalation, physical contingency, electrical engineering, civil engineering and S&T cost	<p>The project has not been appraised as a railway project. Price escalation, financial interest during construction have been taken as a part of the project cost by JICA Study team. Accrued interest during construction can be addressed subsequently in the cash flow statements prepared for financing the DFCCIL costs. Also, electric locomotives which will be procured by Indian Railway and not DFCCIL cannot be part of the project cost. Indian Railways is leasing rolling stock through IRFC and does not make upfront budget provisions for new acquisitions. Costs on advance signaling systems (CTC etc.) and on electric engineering (2x25kV) are not envisaged by Indian Railways. Even the cost of ICD which will be constructed by container operators or under PPP should not be included in the project cost. Inclusion of such items in the cost estimate have given an additional financial impact of Rs.20,000 crore approximately to the project.</p>
13.	ROB not included in the project cost	<p>Ministry of Railways is of the view that those level crossings which justify replacement by ROB/RUB as per Indian Railway norms should be replaced by ROB/RUBs.</p>
14.	Traffic Projection	<p>JICA team despite additional traffic coming from Delhi-Mumbai Industrial Corridor has assumed the growth rate of container traffic as 10.1% from 2003-21 and 6.9% from 2021-31 for the Western Corridor. These growth rates are at variance with the figures suggested by RITES. Also, for Eastern Corridor even though the Executive Summary of JICA report assumes the same</p>

		traffic as that of RITES, in the main report there is substantial variance from RITES projections in certain time frame.
15.	Financial Rate of return	The rates of earnings per NTKM applied for revenue calculation appears to be on the lower side. It has been mentioned that IRs freight rates are very high compared with international standards. There is no evident justification to work out the financials at a lower earning per NTKM. Cross subsidization of passenger traffic will continue for some time to come and burden of debt servicing for DFC project will make it difficult to reduce freight tariff for the present. Price escalation on one hand and reduction in tariff projected for calculating project revenues do not provide judicious balance in project appraisal. Indian Railways does not follow inflation accounting.
16.	New Dedicated Freight Corridor Railway	The suggestion for making New Dedicated Freight Corridor Railway in the Ministry of Railways is not acceptable. The objective of providing single marketing window for DFC customer can be achieved without adding another tier. DFCCIL is already an incorporated company under the Indian Company Act, 1956 having its separate accounting system and balance sheet.
17.	Track Access Charges	Indian Railways will work out Track Access Charges in consultation with DFCCIL. The consultancy on establishing the principle of TAC is under finalization.