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6 February 2026

Attn: Central West and Orana SRITP Team
Transport for NSW
231 Elizabeth Street,
Sydney NSW 2000

BY EMAIL: engage.sritps@transport.nsw.gov.au

Dear Angela, Bailee & Kristy,

Submission on the Draft Central West and Orana Strategic Regional Integrated Transport Plan

Cenagen is pleased to be provided the opportunity to provide feedback on the Draft Central West and Orana Strategic Regional Integrated Transport Plan (the **Draft Plan**).

About Cenagen

Presently, Cenagen is advancing a proposal to reactivate the former Kandos Cement Works located at 1 Jamison Street, Kandos, as a major circular economy precinct which will host an advanced and high technology plant for the manufacturing of green methanol, including facilities for intensive food production and flower crops. This net-zero greenhouse gas emission solution represents a capital investment of approximately \$1 billion, and the project is also projected to generate 300-350 permanent full-time jobs in Kandos.

Distinct from energy-from-waste facilities, our proposal utilises non-combustive thermal gasification technology to convert Processed Engineered Fuel (PEF) derived from residual Municipal Solid Waste (MSW) and Commercial and Industrial (C&I) waste streams into valuable industrial resources, specifically green methanol and CO₂ for greenhouse enrichment, diverting over 450,000 tonnes of waste from landfill annually.

Our waste-to-resource project is currently in the preliminary phase of the State Significant Development (SSD) planning pathway. We are undertaking our final pre-lodgement community consultation on 10 February 2026, after which we will formally lodge a Scoping Report and request Secretary's Environmental Assessment Requirements (SEARs) from the Department of Planning, Housing and Infrastructure. This submission to the SRITP is therefore timely, ensuring that regional transport planning aligns with the imminent formal assessment of this major industrial proposal.

To realise this significant economic and environmental opportunity, our operations require reliable, high-volume transport corridors capable of handling over 450,000 tonnes of incoming feedstock and over 250,000 tonnes (estimated) of outgoing product (green methanol, fruit, vegetables, and flowers) each year.

We have attached a copy of our Fact Sheet (**Annexure A**) outlining the details of Cenagen's proposal for Kandos.

Our submission is focused on ensuring that the Draft Plan's strategic initiatives are implemented in a way that facilitates, rather than inadvertently constrains, heavy industrial logistics.

Submission

We respectfully submit the following recommendations to ensure the Plan effectively supports the region's industrial growth and circular economy objectives:

1. Service Provision and Transport Outcomes for Kandos

We strongly endorse the Draft Plan's recognition¹ that Kandos possess "*relatively good access to both local and regional destinations*" despite not being identified as a major centre in current regional planning. The Draft Plan identifies that towns like Kandos "*represent opportunities to strengthen local service provision and support more sustainable transport outcomes.*" Cenagen's proposal operationalises this strategic insight.

The delivery of "*strengthen[ed] local transport services*" in Kandos requires a commercial catalyst to ensure economic viability. Transport improvements such as passenger rail and regional coach connections rely on consistent, high-volume patronage to remain sustainable. Cenagen is the anchor that provides this demand. By generating daily commuter traffic from an over 300-strong workforce alongside significant freight volumes, our facility will deliver the critical mass required to justify these service upgrades. In light of this, Cenagen respectfully requests that the final SRITP cites the reactivation of the Kandos industrial precinct as the key demand driver enabling these "*strengthen[ed] local services.*"

To directly support the township's revitalisation and ability to accommodate this growth, Cenagen pledges once operational to contribute \$2.4 million annually towards priority areas within the community which includes but is not limited to local infrastructure and amenities. We will direct this funding towards priority initiatives identified through community consultation, ensuring that Kandos, Rylstone, Charbon, and Clandulla are equipped to support this industrial reactivation.

¹ Transport for NSW, Draft Central West and Orana Strategic Regional Integrated Transport Plan, p.53.

2. Securing Heavy Freight Capacity on the Rail Network

Cenagen relies on the Main West Rail Line and the Kandos line for the daily transport of feedstock from Sydney and the export of products to domestic and international markets. We note the Draft Plan's intention under *Initiative 10 (Short term)* to investigate improved day-return connections on the Kandos-Rylstone-Mudgee line, as well as *Initiative 8 (Short term)*, which seeks to increase passenger frequency between Sydney and the Central West. While we support the revitalisation of these corridors, it is paramount that this infrastructure remains multi-functional.

We are concerned that optimising the Blue Mountains and Kandos lines solely for high-frequency passenger services or light rail tourism could inadvertently crowd out the slower, heavy freight paths required for our operations and similar operations. The Draft Plan acknowledges the constraints of the Blue Mountains corridor but also forecasts a decline in coal freight.²

We submit that the capacity freed up by declining coal movements must be strategically reserved for new circular economy freight, such as Cenagen's, rather than being entirely reallocated to passenger services. Furthermore, we request that *Initiative 10 (Short term)* be amended to explicitly state that rail investigations will scope for "Mixed-Use Capacity" (Freight and Passenger). This ensures that track upgrades, such as axle load limits and loop lengths, are designed to accommodate modern industrial freight requirements alongside passenger services.

Prioritising heavy freight capacity on rail is also a crucial road safety initiative. While some heavy vehicle movements will be unavoidable, particularly for local distribution, it is Cenagen's ambition that the majority of its outgoing products be transported via rail. We note that transport logistics is currently subject to ongoing technical investigations by Cenagen; however, the availability of viable rail paths is imperative to maximising this shift away from road transport. By shifting the bulk of our freight task onto rail, we can significantly reduce interaction between heavy vehicles and passenger traffic, directly supporting *Objective 5.5 (A Safe Transport Network)* and the State's "Towards Zero" trauma targets.³

3. Protecting Future Freight Corridors with Strategic Rail Connectivity

We note *Initiative 15 (Short term)* proposes a review of the "Maryvale-Gulgong freight rail line" for strategic connectivity purposes. While we support enhancements to the broader network, it is critical that the development of new links does not result in the de-prioritisation or permanent closure of the rail corridor north of Kandos (Kandos to Gulgong).

Preserving the option to move freight northbound is essential to retain direct, efficient access from the Mid-Western region to the Port of Newcastle, a key international gateway for industrial exports.

² Transport for NSW, Draft Central West and Orana Strategic Regional Integrated Transport Plan, p.32.

³ Transport for NSW, Draft Central West and Orana Strategic Regional Integrated Transport Plan, p.74; NSW Government, Towards Zero - Safe System <https://www.transport.nsw.gov.au/roadsafety/what-we-do/safe-system>.

Furthermore, Cenagen is uniquely positioned to accelerate the region's decarbonisation in line with *Objective 5.7 (Net Zero Emissions)*. While the Australian Government has legislated net-zero targets for 2050,⁴ Cenagen's facility is designed to meet those targets immediately upon commissioning.

The facility will operate at net-zero greenhouse gas emissions from its first day of operation and throughout its entire lifecycle. By producing green methanol, which is an alternative fuel to support the decarbonisation of the shipping sector and the economy, Cenagen's project represents an immediate, tangible realisation of the federal government's long-term environmental goals, decades ahead of the 2050 schedule. Furthermore, our "rail-first" logistics model aligns with the Draft Plan's goal to minimise transport sector emissions.⁵ Preserving the rail corridor North of Kandos is key to maintaining a low-carbon supply chain for the region's industrial output.

4. Protecting Heavy Vehicle Routes & Road Access

With the potential for 350 new permanent jobs and the associated population growth in Kandos and neighbouring Rylstone, Charbon and Clandulla, the local road network must be robust enough to handle increased light vehicle traffic alongside heavy industrial movements. We strongly support *Initiative 16 (Short term)*, which aims to strengthen access for Performance Based Standards (PBS) vehicles.

To ensure *Initiative 16 (Short term)* delivers maximum economic value, we respectfully request that Bylong Valley Way be designated as "Critical Freight Corridor" within the PBS network review. Additionally, we strongly support *Initiative 29 (Short term)* regarding the investigation of de-coupling facilities near Blackheath and Wallerawang. This infrastructure is essential for facilitating efficient two-way logistics between Sydney and Kandos, as it enables high-productivity vehicles (HPVs) to operate efficiently across the broader network before de-coupling to navigate constrained sections, ensuring that both inbound feedstock from Sydney and outbound products destined for domestic and international markets can move with maximum efficiency.

5. Strategic Recognition of the Circular Economy as a Key Economic Driver

Section 5.4 ("A thriving and diversifying economy") currently focuses heavily on the Visitor Economy and Renewable Energy Zones (REZ) as primary economic drivers in the region.⁶ While vital, these sectors have distinct transport profiles that differ from continuous process industries.

The circular economy is a distinct and rapidly growing sector with unique transport characteristics, specifically, consistent daily freight loads rather than seasonal or construction-phase peaks. The reactivation of the Kandos site offers a practical example of how the region can diversify beyond traditional industries.

⁴ *Climate Change Act 2022 (Cth)*.

⁵ Transport for NSW, Draft Central West and Orana Strategic Regional Integrated Transport Plan, p.45.

⁶ Transport for NSW, Draft Central West and Orana Strategic Regional Integrated Transport Plan, p.67.

We consider that *Section 5.4* should be amended to include “Circular Economy and Manufacturing” as a priority growth sector for the region. The specific transport needs of waste-to-resource facilities - reliable, year-round, high-volume rail and road freight corridors, should be recognised alongside the REZ and Visitor Economy.

Furthermore, the creation of over 300 permanent jobs in Kandos will drive significant demand for housing, breathing life into the Draft Plan’s goal of strengthening local centres. We urge Transport for NSW to actively review its Draft Plan to consider Kandos in medium-term *Initiative 2*, *Initiative 4*, and *Initiative 9* to ensure that its transport network grow in tandem with this major industrial reactivation.

Way forward

Cenagen’s project offers a practical pathway to revive Kandos as a thriving industrial centre while contributing to the State’s waste diversion targets, alternate fuel strategy for decarbonisation of industry, and the Federal Government’s net-zero targets.

Cenagen views Transport for NSW as a key partner in delivering this regionally transforming project. To ensure the SRITP accurately reflects the operational reality of the site, we remain available to facilitate a site visit for Transport for NSW.

We look forward to continuing our constructive engagement with Transport for NSW as you finalise the SRITP.

Please let me know if there is anything further information or clarification that we can provide to assist in this review.

Yours faithfully,



Jason O’Sullivan
Chief Executive Officer
Cenagen

Annexures

1. Annexure A – Cenagen Fact Sheet
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