

## **Interoperability of railway operations Guideline – Consultation Feedback Summary**

### **Background**

The Rail Safety National Law National Regulations 2012 were amended on 1 November 2025 to introduce new requirements for accredited rail transport operators (RTOs) whose railway operations are undertaken on, or form part of, the National Network for Interoperability (NNI). These RTOs are now required to consider interoperability when making changes to their railway operations on the NNI.

To assist operators with the new requirements, ONRSR developed an *Interoperability of railway operations Guideline* in collaboration with the National Transport Commission (NTC) and the Australian Rail Industry Standards Organisation (ARISO formerly RISSB).

### **Overview of consultation**

ONRSR consulted on the draft guideline between 27 October and 14 November 2025. This included hosting a webinar, publishing the draft guideline for feedback and one-on-one meetings with RTOs by request to discuss how the new regulatory requirements apply to their individual circumstances.

ONRSR received six written submissions to the draft guideline:

- Two from private individuals
- Pacific National
- Queensland Rail
- Australian Rail Track Corporation (ARTC)
- Australasian Railway Association (ARA)

ONRSR met with nine RTOs one-on-one in November and December 2025.

### **Feedback summary**

ONRSR has grouped the feedback from consultation into two categories;

- feedback on the guideline
- feedback outside the scope of the guideline or outside ONRSR's regulatory remit.

The feedback is provided below.

## Feedback on the guideline

### Feedback

Clarity that the responsibility for consultation with RTOs on the NNI rests with the RTO initiating the change to their railway operations on the NNI (noting that most interoperability changes are likely to be initiated by rail infrastructure managers and not rolling stock operators).

Further clarity is needed regarding NNI inclusion

### Response

The guideline has been amended to include a definition of “initiating RTO” to clarify that it is the responsibility of the RTO initiating a change on the NNI to undertake consultation with other RTOs on the NNI.

Consultation undertaken by the initiating RTO will ensure that any interoperability impacts from the changes that they initiate can be identified. If there are none, an interoperability management plan is not required.

It is a likely consequence of the new regulatory requirement, that RTOs on the NNI will be asked to participate more often in consultation on changes initiated by other RTOs.

The new regulations apply to all RTOs whose operations are undertaken on, or form part of, the NNI, and are not specific to rail infrastructure managers.

The guideline has been updated to include that the Regulator’s determination is based on whether an operator’s current accreditation authorises railway operations to be undertaken on the NNI, regardless of whether that authority is currently exercised.

| Feedback  | Response  |
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|   | <p>Each written notice to individual RTOs under regulation 16(2)(b) also provides this reasoning for the Regulator’s determination.</p>   |
| <p>Need for a clear and consistent definition of interoperability</p>   | <p>The guideline supports understanding and compliance with the new regulatory requirement and therefore adopts the wording of the regulations to define interoperability.</p> <p>Future interoperability reforms may result in a different definition at which time the guideline may be amended.</p>  |
| <p>To reduce administrative burden, the new requirements should be integrated into existing Safety Management System (SMS) elements such as Management of Change, rather than a standalone element.</p> | <p>The guideline remains unchanged with the new interoperability of railways operations requirements being retained as a standalone element of the SMS rather than being integrated with other elements.</p> <p>This will ensure that RTOs have specific systems and procedures for the identification and consideration of interoperability matters in addition to those for managing risks to safety.</p> <p>RTOs should also consider whether other elements of the SMS, such as Management of Change, should be updated for interoperability.</p> |
| <p>Clarity was sought on whether commercial and proprietary information is explicitly excluded from the new requirements to consult.</p>  | <p>The guideline is based on the new regulations which provide that interoperability matters relate to the ability of an RTO’s railway systems to operate together with other RTOs to enable railway operations to be undertaken safely and seamlessly on the NNI.</p>  |

| Feedback   | Response  |
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|  | <p>The regulation does not exclude commercial or proprietary information, and it is possible that such information will enable the assessment of the impact on interoperability.</p>  |
| <p>The guideline should provide for trials, pilots and emerging technology to prevent inhibiting innovation.</p>         | <p>The guideline has been updated to include guidance on trials and pilots.</p> <p>In circumstances where an initiating RTO is proposing to undertake trials and/or pilot programs to test emerging technologies or approaches, consultation on the design of the trial could assist in eliminating or minimising the interoperability matters that may arise from the trial.</p> <p>The level of detail included in an IMP, if it is needed at all, would be commensurate with the scope and complexity of the trial. Limiting or expanding the geographical scope of the trial, or trial participants may assist in eliminating interoperability matters.</p> |
| <p>Request that ONRSR publish a list of all RTOs on the NNI to assist with facilitating engagement and consultation.</p> | <p>ONRSR will include all accredited RTOs that operate on, or form part of, the NNI on the National Rail Safety Register.</p> <p>The guideline also recommends that RTOs publish relevant contact details for interoperability on their websites.</p>   |
| <p>Provide a clear definition of consultation that involves genuine two-way engagement</p>                               | <p>The guideline has been updated to include the following:</p>   |

| Feedback   | Response  |
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|  | <p><i>Effective consultation should involve genuine engagement with affected RTOs to seek and share relevant information about the planned change and impacts to ensure well-informed decisions by the initiating RTO.</i></p>  |
| <p>ONRSR should develop a standardised Interoperability Management Plan template</p>   | <p>ONRSR has not developed a standardised template at this time. RTOs have the flexibility to develop Interoperability Management Plans best suited to the specific change to their railway operations.</p> <p>The guideline provides guidance on what should be included in an Interoperability Management Plan depending on the level of interoperability impacts associated with the change to railway operations.</p>   |
| <p>Clarity was sought on what happens where RTOs that initiate a change on the NNI consult with affected RTOs and disagree on the impact of the change and whether the preparation of an Interoperability Management Plan is required?</p> | <p>While the new regulatory requirements mean that all RTOs on the NNI will need to have a new interoperability of railway operations element in the Safety Management System, this will only be used if an operator is initiating a change on the NNI. It is this initiating operator that must identify and consider the interoperability matters.</p> <p>It is up to the initiating operator to determine what action should be taken as a result of differing views even in the event of a disagreement as this would form part of the initiating operator's consideration of interoperability matters.</p> |

| Feedback  | Response  |
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| Recognising human-factors in the consideration of interoperability. | The section on human-factors in the guideline has been updated. |

## **Feedback outside the scope of the guideline or outside ONRSR's regulatory remit**

ONRSR has also received feedback it considers is outside the scope of the new regulations but could be considered in future interoperability reforms under the National Rail Action Plan and Rail Safety National Law Review as outlined below.

ONRSR has provided this feedback to the NTC for its consideration.

- The need for a dispute resolution mechanism in circumstances when RTOs form different views on the required level of interoperability associated with a change to the NNI.
- The need for a central coordination mechanism to promote uniform interoperability approach and requirements.
- Concerns with the implementation period including:
  - the four-month transition period for compliance is insufficient
  - a phased approach should be adopted where initially the new requirements only apply to rail infrastructure managers.
- Some RTOs have indicated that they have interpreted the regulatory requirement differently to mean a single Interoperability Management Plan is required to consider all changes on a network, rather than an Interoperability Management Plan for each change to railway operations on the NNI that has interoperability impacts.
- Concerns that regional and smaller freight operators will face disproportionate regulatory and compliance requirements under a uniform interoperability framework.
- Concerns that the exclusion of tourist and heritage operators on the NNI may impact access to the NNI if these operators cannot meet the required standards and procedures.
- Calls for requiring a national standard number format on locomotives.